

**Western Interior Alaska, Seward Peninsula, Northwest Arctic, and North Slope
Subsistence Regional Advisory Councils**

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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

Doug Vincent-Lang, Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Stosh Hoffman, Vice Chair
Alaska Board of Game
c/o Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Christianson, Commissioner Vincent-Lang, and Vice Chair Hoffman,

We write to you on behalf of Western Interior Alaska, Seward Peninsula, Northwest Arctic, and North Slope Subsistence Regional Advisory Councils (Councils) in a unanimous voice to inform you of our shared concerns over the population decline of the Western Arctic Caribou Herd (WACH), a highly important subsistence resource for our regions. The Councils request the Federal Subsistence Board (Board), Alaska Board of Game (BOG), and Alaska Department of Fish and Game (ADF&G) collaboratively address concerns about the continuing decline of the WACH both through regulatory changes and increased funding for additional herd monitoring.

The Councils represent subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Western Interior, Seward Peninsula, Northwest Arctic, and North Slope Regions. They were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and are chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charters establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within their regions. The Councils also review resource management actions occurring outside their regions that may impact subsistence

resources critical to communities served by the Councils. The Councils provide a public forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region, and we speak on behalf of over 40 Alaska communities found within the WACH's range.

Councils met on March 7, 2024, in Anchorage to discuss concerns over the declining population of the WACH and to reach consensus on recommendations to the Board on Wildlife Proposals WP24-28 & 29, submitted by the Western Arctic Caribou Herd Working Group and Northwest Arctic Council, respectively. Both these proposals requested substantial reductions in the harvest limits by federally qualified subsistence users (FQSU) within the range of the WACH. Regulatory changes that recommend such severe harvest restrictions in an effort to preserve this resource heavily impacts rural communities highly dependent on these caribou across their range. Our four Councils did not take this discussion or subsequent recommendation lightly. Our Councils are extremely concerned about the continuing decline of the WACH and committed to do our part to help ensure the herd remains sustainable for the future as caribou are a vital subsistence resource for our communities. The Councils are in agreement that harvest limits need to be reduced and cow harvest curtailed as desperate means to do what we can to ensure sustainability of the herd for future generations. Reducing harvest can help but clearly is not the only contributing factor toward the herd's decline.

First, our Councils would like to acknowledge environmental pressures contributing to the WACH's decline that are beyond our ability to address as Regional Advisory Councils. Climate change is altering the landscape caribou need to thrive, which has both reduced caribou fitness and impacted caribou migration. Still, caribou fitness and migration can also be affected by hunting pressure and resource development projects. While the Councils submit regulatory proposals that consider these impacts to the resources and our regions as well as comments to the appropriate governmental agencies on proposed natural resource development projects, we ultimately are on the sidelines in these arenas.

Our Councils consider it necessary to highlight regulatory disparities between harvesters of the WACH that require your immediate attention. Caribou populations in many herds across Alaska are declining, and this imparts a ripple effect on FQSUs in our regions. For example, road accessible herds, such as the Fortymile and the Nelchina, are both going through severe population declines. Hunting on both herds is heavily restricted or nonexistent for all hunters, resident and nonresident alike. Yet the number of non-federally qualified users (NFQU) wanting to harvest caribou has not decreased. Regulatory restrictions and closures on these and other caribou herds throughout the state result in hunters shifting their efforts elsewhere, such as to the WACH. Meanwhile, most FQSU do not have the financial means to travel to other parts of the state for hunting, and therefore, must rely on what the land around them yields.

At the December 2023 WACH Working Group (WG) meeting, the WACH WG voted to maintain the herd at the preservative management level. Based on the population data presented to them, the WACH WG felt it was best to "*prompt increased restrictions where harvest may be limited to subsistence use only and biological monitoring of the herd will be maximized*" as

outlined in the Western Arctic Caribou Herd Cooperative Management Plan (Plan)¹. The Councils believe that now is time to enact provisions outlined in this plan, including restricting harvest to Alaska residents only, and closures of federal public lands to NFQUs. The Councils acknowledge the Board's adoption of WP24-30/31 and the BOG's passing of amended Proposal 38 addressing the Plan's provisions, but both proposals only focus on Unit 23. While these are good first steps to protect the herd and subsistence users, we believe these measures should be implemented across the WACH range.

The Councils believe that even small numbers of nonlocal harvest negatively impact the herd. The Councils have been presented with information on the amount of Western Arctic caribou taken by nonresident hunters with the interpretation that nonresident harvest does not negatively impact the WACH population due to the small amount of bull harvest. The Councils counter this with the notion that sport users, regardless of the numbers they harvest, are contributing to the continuing decline of the herd with this take. In addition, hunters that are unfamiliar with caribou movement do not understand or respect how these animals migrate. For example, Traditional Ecological Knowledge (TEK) instructs us to leave the lead animals alone to allow for their traditional migration patterns to occur. Taking the lead caribou disrupts the others' movements and can divert the herd from past feeding and calving areas as well as from traditional hunting grounds.

Furthermore, nonresident hunting should have been closed across the range of the WACH before any reduction in subsistence limits occurred, much less the self-imposed and significant reduction that WP24-28 & 29 requested. We further make the case that when severe harvest restrictions are being enacted on federal and state land, sport hunting take of WACH should not be allowed regardless of the how small the percentage is. FQSUs should not be limited to harvests insufficient for our families and communities, while the limits of those hunting for recreation remain unchanged, regardless of how many animals they actually take. This action would further align the management actions spelled out in the Plan by mitigating human impacts to caribou. The Councils would like you to consider the impacts of any sport hunting take of WACH when discussions are occurring about limiting subsistence harvest limits.

Additionally, our Councils have received concerning reports from rural residents of non-local hunters wasting meat. Locals in hub communities continue to observe NFQU hunters who use the communities as launchpads to access hunting grounds treat meat poorly, often resulting in spoiled meat being disposed of in village dumpsters. Hunters that are accompanied by guides generally have meat that is properly cared for in the field and have community contacts for meat distribution for anything unwanted by the hunter. However, those hunters who utilize transporters frequently do not have the knowledge or ability to properly care for their meat while in the field, nor do they have the community contacts within a village to distribute unwanted meat. In many cases, they leave meat in the village dumpsters to rot. In these instances, the antlers are not found with the carcass and travel out of communities with the hunters. It is highly disrespectful and wasteful for meat to be improperly cared for or just thrown away when unwanted, when rural residents with high levels of food insecurities are faced with harvest limit restrictions due to caribou population concerns.

¹ *Western Arctic Caribou Herd Working Group. 2019. Western Arctic Caribou Herd Cooperative Management Plan - December 2019. 54 pp.*

For the reasons stated above, the Councils would appreciate your consideration of the following regulatory actions to assist in the recovery of the WACH, which the Councils will discuss submitting regulatory proposals on these topics at the appropriate time to the Board or BOG at upcoming Council meetings:

- Complete closures of nonresident hunting on State lands and NFQU hunting on Federal lands throughout the range of the WACH, or
- Create a nonresident drawing only hunt opportunity for the entire range of the WACH, similar to the amended BOG Proposal 38, and include a reporting requirement of 5 days for successful hunters to ensure correct and timely harvest data is collected, or
- Restructure the current resident hunt throughout the range of the WACH by issuing those permits only in communities within the WACH's range before the season starts, similar to how RM880 permit hunt is structured.
- In addition to the current individual harvest limit, the creation of a family harvest limit, or community harvest limit for caribou for residents. This would be more in tune with how rural hunters traditionally take caribou.

The Councils would like to see more interactions among residents, biologists, and agencies in rural communities. More meetings and other interactions in our communities will help managers and biologists to better understand the needs and concerns of subsistence users and listen to and learn from our TEK. This will also help rural subsistence users to better understand what is occurring with the WACH population and the research and management actions that are being taken to mitigate the population decline. Finding ways to draw on TEK and scientific knowledge together are actions that can be taken to effect positive change in the declining WACH.

Non-regulatory suggestions to assist in the recovery of the WACH that can be taken by the Board, BOG, and ADF&G include:

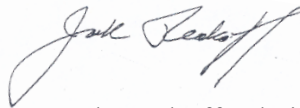
- Inform your associated law enforcement office(s) of the importance of this herd to subsistence users and request that there are adequate officers in the field enforcing hunting regulations.
- Increase survey work and data collection on the WACH as lined out in the Plan. This will insure Federal and State managers have the most up to date information on the herds composition, population, and migration patterns when making management decisions.
- Request both research and management agency staff visit villages impacted by the WACH population decline to facilitate open conversation between the management agencies and the subsistence users their decisions affect.
- Better incorporation of TEK into western management and harvest strategies.

This letter is about our Councils' concerns over the declining WACH population and requests for action. By taking actions as outlined above, you will assist us to continue our ability to pass down generational knowledge to our children and grandchildren. Collectively, the Councils are fighting for the health of our elders and the next generations, and our culture, but we need your help. We ask that collectively you will engage wholeheartedly with stakeholders and community members when opportunities for public comments arise; adopt regulatory changes that will affect real change to stop or slow the population decline of the WACH across our four regions and that

will prioritize subsistence harvest over sport harvest; and prioritize funding research on this herd to better understand what is happening on the landscape.

The Councils would like to thank you in advance for reading this letter and any action you take to assist in the preservation of the WACH. If you have questions or would like to discuss this further, please contact us through Subsistence Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_pilcher@fws.gov.

Sincerely,



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



Brower Frantz, Chair
North Slope
Regional Advisory Council

Cc: Federal Subsistence Board
Alaska Board of Game
Western Interior Alaska Regional Advisory Council
Seward Peninsula Regional Advisory Council
Northwest Arctic Regional Advisory Council
North Slope Regional Advisory Council
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