

**Northwest Arctic Subsistence Regional Advisory Council**  
c/o Office of Subsistence Management  
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In Reply Refer To:  
NWRAC.C25003

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

Dear Chairman Christianson:

The Northwest Arctic Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2024 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held via teleconference on November 8, 2024, the Council identified five concerns and recommendations for this report. The Council approved this annual report at its March 27– 28, 2025 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Northwest Arctic Region.

**1. Addressing the Impacts of Caribou Migration Displacement by Non-Local and Non-Resident Hunters on Federal and State Lands in Unit 23**

The Council continues to have grave concerns about the recurring issue of hunters affecting caribou migrations. While the Board has taken phenomenal actions on Federal lands based on the Council's recommendations and input from other groups, such as the Western Arctic Caribou Herd Working Group, this issue persists on State managed lands.

The Council urges the Board to take further action by working collaboratively with the State to implement stronger regulations and closures on State managed lands. While progress on Federal public lands is appreciated, allowing for less restrictions on activities on State managed lands undermines the efforts made on federally managed lands and creates a cycle of ineffective management.

To protect all subsistence resources, there must be parity in closures and regulations across both Federal and State managed lands. With the most recent caribou population estimate at 152,000—well below the State's population objective of at least 200,000—it is concerning that the State has not taken sufficient measures to curb the impact of hunting. Although a limit of 15

caribou per resident hunter, with only one cow allowed, has been imposed, the lack of land closures on State managed land also remains a significant issue. The Council is continuing to highlight this concern in the annual report to emphasize the need for comprehensive and coordinated action.

## **2. Support the Expansion of Statewide Qualitative and Quantitative Research on Salmon Returns and Climate Change Factors**

The Council remains deeply concerned about the ongoing low salmon returns, particularly in the context of a changing climate. Climate-related changes, such as the sloughing of coastal and riverbanks, raise significant questions about the impact of increased sedimentation on fish returns and spawning habitats.

The Council emphasizes the need for comprehensive scientific studies to better understand the broader effects of climate change on salmon populations. There are ongoing concerns about whether current salmon escapement levels are sufficient to ensure sustainable runs in the future, and whether the lower returns are indicative of long-term declines in salmon populations.

Given the persistent nature of these challenges, the Council underscores the critical importance of continued scientific monitoring, research, and proactive measures to address the factors impacting salmon returns. The Council would like to request the Board to fund statewide salmon studies through the Fisheries Research Monitoring Program (FRMP) and encourage their workforce to seek grants to conduct continuing statewide salmon research.

## **3. Support the Expansion of Research Studies that include Local Observations and Traditional Knowledge of Climate Change Impacts to Subsistence Resources and Subsistence Opportunities**

It is clear that there is a vital relationship between local and traditional knowledge (LTK) and scientific research in understanding climate change impacts. This collaborative approach not only enriches the data but also ensures that the insights gained are grounded in the lived experiences of the communities directly affected. Expanding studies on how climate change impacts rivers and ecosystems is crucial. The research conducted by various agencies that includes before-and-after comparisons will provide particularly valuable insights. Integrating these observations with scientific data can help guide more effective resource management and decision-making.

The Council asks the Board to continue to support FRMP projects that incorporate LTK and climate change impacts on wild resources relied on by local communities for subsistence. The Council also requests the Board to encourage their agency staff to include climate change research and LTK in agency and Tribal research projects to further strengthen these efforts.

**The remainder of this report is for informational purposes only and the Council does not require a response; however, the issues are significant and important, and the Board may benefit from this knowledge.**

#### **4. Addressing the Impact of Non-Resident Hunting on Unit 23 Caribou Populations**

The Council remains concerned about the ongoing decline of the Western Arctic Caribou Herd and has previously submitted Federal and State wildlife proposals to address the issue. These proposals aim to reduce the caribou harvest limit for federally qualified subsistence users (FQSU) and impose additional restrictions on non-local and non-resident hunters. The goal is to slow the population decline while ensuring subsistence users harvest opportunity. Although these reductions have potentially helped slow the declines, the Council remains worried that the State still permits non-resident hunters to hunt caribou on state managed lands in Unit 23.

Consequently, The Council remains steadfast in these positions and intends to submit further proposals on this topic to address the impact non-resident hunting on the caribou population in GMU 23.

#### **5. Concerns About Migratory Waterfowl and Water Quality**

The Council expresses ongoing concerns regarding the health of migratory waterfowl populations and the impacts of water quality on these species in the Northwest Arctic Region. The Council would like to invite the local Council member for the Alaska Migratory Bird Co-Management Council to provide a status report at a future Council meeting.

The Northwest Arctic Subsistence Regional Advisory Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the Northwest Arctic Region. If you have any questions regarding this report, please contact me via Lisa Hutchinson-Scarborough, Subsistence Council Coordinator, Office of Subsistence Management, at [lisa\\_hutchinson@ios.doi.gov](mailto:lisa_hutchinson@ios.doi.gov), or 1-800-478-1456 or (907) 310-4097.

Sincerely,

Thomas Baker,  
Chair

cc: Federal Subsistence Board  
Northwest Arctic Subsistence Regional Advisory Council  
Interagency Staff Committee  
Office of Subsistence Management  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Assistant Director of Wildlife Conservation, Alaska Department of Fish and Game  
Administrative Record