



## Federal Subsistence Board

Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503 – 6199



In Reply Refer To:  
OSM.A25010

Thomas Baker, Chair  
Northwest Arctic Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1101 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chair Baker:

This letter responds to the Northwest Arctic Subsistence Regional Advisory Council's (Council) Fiscal Year 2024 Annual Report. The Federal Subsistence Board (Board) appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your 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 lands 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.*

**Response:**

We share the Council's concerns over the Western Arctic Caribou Herd (WACH). The Board understands the Council submitted Proposal 38 to the Alaska Board of Game (BOG) in 2023/24 to close all nonresident caribou hunting in Unit 23. The BOG adopted this proposal as amended to establish a nonresident drawing hunt with up to 300 permits available for Unit 23, effective in regulatory year 2025. While the BOG did not close the nonresident hunt as the Council proposed, they did take a substantial step toward reducing the impact of nonresident hunters on the WACH.

The Council may submit proposals to the BOG during the next call for proposals in the Western Arctic/Western Region in the Spring of 2026. We also encourage the Council to continue inviting ADF&G staff to their meetings to present information on the WACH, discuss management, and to maintain critical local relationships.

We are interested in the Council's request to work collaboratively with the State and will work to engage in dialogue with the BOG to build a relationship at the statewide level.

**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.*

**Response:**

We are committed to improving the information used to manage subsistence fisheries on Federal public lands and waters in Alaska. Every two years the Office of Subsistence Management

initiates the FRMP and issues a Notice of Funding Opportunity for research addressing regional priority information needs (PIN). The FRMP operates across six distinct regions: Northern Alaska, Yukon, Kuskokwim, Southwest Alaska, Southcentral Alaska, and Southeast Alaska. The FRMP also contains a multi-region category for projects that encompass more than one region.

The Council's concern about the socio-economic subsistence user impacts, resulting from physical salmon habitat changes like sedimentation from eroding coastlines and riverbanks underscores the need for multidisciplinary studies examining both physical and biological factors. Given the potential for environmental variability to affect the availability and use of subsistence fisheries, investigators are encouraged to incorporate detrimental effects to salmon habitat into their proposals.

FRMP project selection is based in part on how proposals address rating criteria. One criteria is whether project proposals are responding to local issues of concern, which are identified through the PINs. Your Council, in coordination with the other northern Councils has an opportunity to ensure that large-scale, statewide salmon studies are an identified PIN when this topic next comes up again, in the fall of 2026.

**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.*

**Response:**

We thank the Council for sharing this information about the types of research projects it would like to see prioritized and agrees that documenting local and traditional knowledge is one of the most direct and impactful means to understanding the changes in weather, habitats, migrations, and populations and their effects on subsistence resources and communities.

The Alaska National Interest Lands Conservation Act Title VIII Section 812 states that the Secretary, in cooperation with the State and other Federal agencies, shall “seek data from, consult with and make use of the special knowledge of local residents engaged in subsistence uses,” which underscores the significance of local and traditional knowledge to subsistence research and management. The FRMP is designed to respond to this mandate.

When developing the PINs that guide project selection for the FRMP, this Council has already taken the first step by asking that projects rely upon and incorporate local and traditional knowledge. All eight of the PINs contributed by the Council call for documentation of this knowledge, and most of the PINs also focus on the changing environment and resulting impacts on subsistence fisheries.

“Traditional Ecological Knowledge” is one of the three named categories of information that the FRMP seeks, in addition to harvest monitoring and stock, status, and trends and incorporation of local and traditional knowledge and methods to gather and document local and traditional and local knowledge is an element that is considered when evaluating the technical-scientific merit of FRMP project proposals. We encourage more investigators to combine local and traditional knowledge studies with those that assess stock status and trends to assist with documenting and understanding of changing subsistence ecosystems.

#### **Other Annual Report Topics for Information Purposes Only**

The Board thanks the Council for sharing information in your FY-2024 Annual Report on other issues significant to your region and subsistence users, (4) concerns about the ongoing decline of the WACH and the need to address the impacts of non-resident hunting on this herd’s population in Unit 23; and (5) ongoing concern regarding the health of migratory waterfowl populations and the impacts of water quality on these species in the Northwest Arctic Region.

We appreciate and value the traditional knowledge, observations, and expertise you share. With this information, we are better prepared to make informed decisions.

In closing, we want to thank you and your Council for your continued involvement in the Federal Subsistence Management Program and the work you do on behalf of federally qualified subsistence users. We appreciate your efforts and are confident that federally qualified subsistence users of the Southcentral Region are well represented through your work.

Sincerely,

Anthony Christianson  
Chair

cc: Northwest Arctic Subsistence Regional Advisory Council  
Federal Subsistence Board  
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