

INTERAGENCY STAFF COMMITTEE COMMENT
WSA26-01

The Federal Subsistence Board (Board) considers key sections of ANILCA Title VIII before taking action on proposals requesting closures or restrictions. Specifically, those sections pertaining to Council deference (section 805(c)) and those pertaining to limitations to closures or restrictions of subsistence and nonsubsistence uses on federal public lands in Sections 815(3) and 816(b). These three sections speak to the heart of Board authority and require a careful balance between the federal priority, the continuation of subsistence uses, the necessary conservation of subsistence fish and wildlife, and unnecessary restrictions. In the case of WSA26-01, there are differing Council recommendations to consider when evaluating the criteria for deference.

The Northwest Arctic and Seward Peninsula Subsistence Regional Advisory Councils have supported WSA26-01 with modification to close to the harvest of cows. The North Slope Subsistence Regional Advisory Council (NSRAC) supported WSA26-01 with modification to reduce harvest limit in Unit 26A Southwest (SW) to 10 caribou, only one of which may be a cow. The NSRAC recommendation to the Board includes information that the Western Arctic Caribou Herd (WACH) does not generally occur in the southwestern portion of Unit 26A during primary times for cow harvest. However, radio collar and photocensus data highlight the importance of this hunt area for the life cycle of the herd, including during the cow season, which opens July 16 (Maps 3, 5, 6 of WSA26-01 analysis). The WACH core calving area is entirely within Unit 26A SW. The herd's summer range, which is critical for caribou cow health and reproduction in the fall, is mostly within Unit 26A. While this caribou herd spends more time in Unit 23 than any other unit, as demonstrated by caribou collar data (48% of all female GPS collar locations), Unit 26A is the next most used unit in their range (40% of all GPS locations). And nearly every year some WACH caribou spend the entire winter within Unit 26A.

It is also important to note that this portion, Unit 26A SW, was separated out in previous regulatory decision making as it was considered core WACH habitat. However, the area to the east was omitted from special action requests and proposals restricting harvest due to overlap with Teshukpuk and Central Arctic caribou herds, which are relatively healthy. The ISC recognizes there are North Slope communities that rely on the WACH for food security and cultural practices, similar to other communities along the entire migratory range of the herd.