

INTERAGENCY STAFF COMMITTEE COMMENT
WSA26-02

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.

Although the Western Arctic Caribou Herd (WACH) Working Group was unable to provide comment on WSA26-02, the WACH Management Plan states that “closure of federal public lands to non-qualified users may be necessary” during times of critically declining population levels. Based on the most recent photocensus conducted in 2025 the WACH is currently below the critical population threshold of 130,000 caribou.

While the Unit 22 caribou are managed as part of the WACH, there are unique aspects of the caribou occurring on the Seward Peninsula that are important to consider for WSA26-02. Although collared WACH animals have not used the historic winter range in Unit 22 since 2019, small remnant groups continue to occur across the Seward Peninsula, including within Bering Land Bridge National Preserve. These isolated groups are all that remain for local subsistence opportunity in a region where caribou are increasingly scarce. The population demographics of these remnant groups of caribou are unknown; thus, both cow and bull harvest could affect population vigor and productivity. Further, as noted in the analysis, there is a lack of available data due to low harvest reporting by Alaska residents and non-residents since 2023 in Unit 22. Because of this lack of information, potential biological impacts on the WACH from harvest by non-federally qualified users are poorly understood. Given the absence of population demographic information, including bull:cow ratios, calf:cow ratios, and percentage of calves for these small caribou groups in Unit 22, a cautious approach may be necessary to help protect the overall viability of the WACH and to ensure long-term subsistence opportunities can continue in the region.