

INTERAGENCY STAFF COMMITTEE COMMENT
WSA26-03

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.

There are nuances in the available data on the Western Arctic Caribou Herd (WACH) in Unit 26A Southwest. Although the WACH Working Group was unable to provide a comment on WSA26-03, the WACH management plan states that “closure of federal public lands to non-qualified users may be necessary” for critical, declining population levels. Analyses for WSA26-01 and WSA26-03 demonstrate that the lands in Unit 26A Southwest are particularly important to the WACH and the residents who depend on caribou for subsistence. The WACH is generally present in Unit 26A throughout the year. Calving occurs in Unit 26A Southwest and bulls typically summer there as well. Residents of Wainwright and Point Lay rely on both edible and nonedible materials from caribou to meet their subsistence needs. Estimates produced from subsistence surveys suggest that residents of Wainwright harvest more caribou from the WACH than most other communities. However, as stated in the analysis for WSA26-01, harvest data from Unit 26A is limited and recent harvest report data in Unit 26A Southwest is unavailable. An extrapolation of harvest report data from other units suggests that prior to 2023, Non-Federally Qualified Users (NFQU) harvest levels in Unit 26A Southwest were relatively low. In 2024, the Board adopted a closure to the harvest of caribou by NFQU in Unit 23, but it is unknown if this has affected NFQU harvest levels in Unit 26A Southwest as well as in other units.