



## Federal Subsistence Board

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



In Reply Refer To:  
OSM.F26031

Louis Green, Chair  
Seward Peninsula Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1101 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chair Green:

This letter responds to the Seward Peninsula Subsistence Regional Advisory Council's (Council) Fiscal Year 2025 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to consider these reports. The 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. Natural Disaster Response to Address the Impacts on Subsistence Communities**

*"The Council discussed the increasing frequency and severity of storms that have affected coastal communities such as Golovin and Kipnuk. These adverse weather events have caused notable disruptions for subsistence users, as seen most recently with the remnants of Typhoon Halong that swept across the Yukon-Kuskokwim Delta in 2025 and the remnants of Typhoon Merbok in 2022. Subsistence users suffered substantial losses, including damage or destruction of property, loss of freezers and their contents due to storm surges, power outages, and other storm-related disruptions. After Merbok, the community of Golovin lost its entire winter food supply and required additional harvest opportunities to restock its freezers.*

*For several years, the Council has reported the increased frequency of extreme weather events, particularly the unseasonable warm temperatures and late-fall storms that now occur before the ground freezes. These conditions have heightened erosion risks that leave coastal communities in the Norton Sound region vulnerable to storm surges and severe flooding. The Council considers that, given the increasing frequency and severity of these events, it is imperative that the Federal Subsistence Management Program is prepared to support subsistence users during*

*natural disasters without delay. The Council emphasized that temporary adjustments to fishing and hunting harvest regulations on federal lands and waters, such as emergency Special Action Requests, will be necessary to ensure continued access to critical resources when storms or other disasters compromise the food security of these communities.*

*As these storms become more frequent, the Council emphasized the importance of monitoring these events more closely and ensuring timely and effective responses from agencies to support subsistence users and protect their food security.*

#### **Request to the Board**

*The Council respectfully requests that the Board and Department of the Interior (DOI) agencies provide a report to Regional Advisory Councils outlining the actions they can take to support subsistence users during State-declared disasters. The Council would greatly appreciate updates on the agencies' response to such events."*

#### **Response:**

The Board is following the impacts of Typhoon Halong on those federally qualified subsistence users displaced by such an extreme event. Federal agencies and State and Tribal partners are working to provide some support to these rural Alaskans who now currently live in an unfamiliar urban environment. Local organizations are coordinating southcentral based subsistence opportunities, gatherings, and youth programs for the victims of Typhoon Halong, and federal and State agencies have issued permits (bird egg collection) in response to special requests. Federal agencies are also working to confirm if temporarily relocated rural residents can retain their federally qualified subsistence user status. Furthermore, Individual Assistance and Public Assistance programs through the State and the Federal Emergency Management Agency can reimburse individuals and communities for the replacement of lost and damaged subsistence equipment and infrastructure. Additional funding resources and potential donations are being pursued as well. If there are any special action requests submitted, the Board will review and act on them without delay. We will keep your Council updated as we learn more.

## **2. Prioritization of Subsistence Uses in Light of Caribou Declines**

*"The Council remains deeply concerned about the continued decline of the Western Arctic Caribou Herd (WACH). At the fall 2025 meeting, the Council received an update on the status of the herd and the proposed regulatory changes intended to support its recovery. The Council urges the Board to ensure subsistence users retain meaningful harvest opportunities as necessary conservation measures are implemented. The Council also recognizes that the decline of the herd is one of the most significant issues that subsistence users face today and believes it is important to take additional actions to assist in the recovery of the herd. In the absence of predator control, both State and Federal agencies need to conduct hunter awareness and education about the decline of the herd and measures individuals can take to protect its long-term viability.*

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Recommendations

*The Council recommends DOI agencies implement educational initiatives to bridge informational gaps that may support the recovery of the herd. More specifically, hunters may benefit from education efforts that focus on accurately distinguishing bulls from cows, thereby promoting sustainable harvest practices."*

**Response:**

The Board shares the Council's concerns over the Western Arctic Caribou Herd (WACH) and the challenge of implementing the subsistence use priority when strong conservation measures are called for.

In June 2026, the Board considered three Special Action Requests that seek to address the WACH's decline. Two of these (WSA26-02 and WSA26-03) asked to close Federal public lands in Unit 22 and 26A SW, respectively, to caribou hunting by non-federally qualified users (NFQUs). The third (WSA26-01) requested additional reductions in the caribou harvest limit for subsistence users, which the Board adopted in part (eliminate the harvest of cows) and deferred action on the rest of the reduction discussion until their February 2027 regulatory meeting. The Board adopted these closures, acknowledging that local users in the range of the WACH have already taken a significant reduction in their caribou harvest limit, and have shown themselves willing to take additional measures in order to support the long-term sustainability of the herd. Balancing these reductions with a request to close to NFQU in your region maintains a meaningful harvest opportunity while prioritizing subsistence uses.

The Office of Subsistence Management reached out to National Park Service (NPS), Bureau of Land Management (BLM), and the U.S. Fish and Wildlife Service (FWS) to gather harvest data and education efforts and inform them of the Council's request. A summary of these efforts is included here. Additionally, the Council may want to consider inviting representatives from the relevant agencies to discuss these on-going efforts at an upcoming Council meeting.

The NPS Western Arctic Parklands (WEAR) would like to inform the Council that the Caribou Hunter Success Working Group is a group composed of regional entities, government agencies (including FWS and Alaska Department of Fish and Game [ADF&G]), and local residents with a focus on promoting safe and respectful caribou hunting in the Northwest Arctic (GMU 23). The Working Group is currently discussing goals and outreach for this year, including such efforts as radio messaging, hunter meetings, and the feasibility of hosting a meeting in Kotzebue prior to the Alaska Board of Game meeting. Additionally, WEAR conducts outreach and education efforts through school visits that promote caribou conservation, subsistence processes, and best practices. The working group also engages communities through social media outreach and by holding community meetings and joint meetings with ADF&G. WEAR and other partners have representatives serving on the Western Arctic Caribou Herd Working Group Communication Committee, which sends out educational postcards and the Caribou Trails [newsletter](#) to P.O. Box

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holders. WEAR appreciates the Council's recommendations and will work to strengthen its outreach by placing greater emphasis on helping hunters distinguish cows from bulls.

The NPS Bering Land Bridge National Preserve (BELA) would like to let the Council know that on the Seward Peninsula, ADF&G and volunteers hosts "hunter safety" events, and educators in hunter safety are also involved in the school system. BELA staff are open to increased involvement in messaging and education efforts aimed at preserving the WACH and supporting reduced cow harvest.

Like BELA, BLM has relied on ADF&G to conduct outreach related to WACH in the National Petroleum Reserve in Alaska, in part because of BLM's decreased wildlife staff capacity. ADF&G has a helpful educational [brochure](#) to teach hunters how to distinguish bulls from cows. Upon hearing your request, BELA staff offered to elevate discussion about greater BLM involvement in education and outreach related to WACH conservation within their agency.

In addition to federal and State agencies, hunter success messaging is powerful when it comes from Tribal Councils and Native organizations, since Tribes are the holders of Traditional Ecological Knowledge about caribou. For example, both the Native Village of Kotzebue and the Kiana Elder's Council have previously issued guidance about traditional values for caribou hunting and conservation.

### **3. Documenting the Ambler Road Project Impacts on Caribou Migration**

*"The Seward Peninsula has not seen large numbers of the WACH in quite some time and remains concerned about the impact of the Ambler Road project on the movement of the herd. Through its migration to wintering grounds, the herd previously accessed the Seward Peninsula region near the corridor of the proposed project, and the Council considers it necessary to study the movement of collared animals to determine if road development alters the herd's migration route into our region. The Council believes this is particularly important based on previous observations that heavy traffic from exploration efforts in our region along the Kougyurok Road may influence herd movement patterns, thus highlighting the sensitivity of caribou responses to human activity.*

#### **Recommendation**

*The Council requests the National Park Service to continue to share updates about caribou studies on the northern Seward Peninsula and on the WACH. Additionally, the Council recommends that studies be conducted to evaluate the impacts of the Ambler Road project on the movements of collared caribou and its potential impacts on the migration of the WACH."*

#### **Response:**

The Board appreciates hearing the Council's concern about changes in caribou migration patterns and how this affects subsistence activities. In 2024, BLM published the Ambler Road Final Environmental Impact Statement (EIS), which contains information on potential impacts of

the road on caribou and other resources. The EIS is publicly available at BLM's E-Planning website: <https://eplanning.blm.gov>. To find the Ambler Road EIS, type "Ambler" in the Site Search at the top of the homepage.

Many factors have the potential to affect caribou migration including temperature, precipitation, herd size, snow conditions, range condition, the individual caribou's condition, and human activity. The NPS has produced an extensive number of papers and reports investigating factors that influence caribou migrations. For the Council's consideration a list of these reports is enclosed. Please continue to use the Council's coordinator to facilitate the NPS providing these reviews and updates as the Council desires.

#### **4. Elevating Ongoing Salmon Concerns**

*"The Council continues to be concerned about the ongoing salmon crisis across Alaska, exacerbated by the Bering Sea trawl fleet fishery and other commercial intercept fisheries on the Alaska Peninsula and Gulf of Alaska. The continued declines of King and Chum Salmon are now widespread across multiple regions of Western Alaska, including Kotzebue, Bristol Bay, the Yukon and Kuskokwim, and Seward Peninsula. People are witnessing the heartbreaking declines of salmon runs on the rivers and tributaries they have stewarded and depended on for millennia. Meanwhile, commercial fisheries continue to harvest indiscriminately with minimal oversight. The siloed management of Alaskan fisheries across multiple jurisdictions is unintentionally punishing in-river users who continue to suffer through the hardships and the burden of conservation. Because marine fisheries management spans both Federal and State jurisdictions, the Council believes the Department of Commerce must be engaged in discussions to collectively address the declines of salmon in Western Alaska.*

##### *Request to the Board*

*The Council requests the Board to elevate these concerns to the Secretaries of the Interior and Agriculture to request that the Department of Commerce become directly involved in addressing cross jurisdictional fisheries management issues that impact subsistence users, such as salmon bycatch."*

##### **Response:**

The Board recognizes the serious, perennial challenges subsistence salmon fisheries face in the absence of coordinated interjurisdictional management. From 2022 to 2024, the Board sent five letters, representing nine of ten Subsistence Regional Advisory Councils, to the Secretaries of the Interior and Agriculture (Secretaries) outlining Council recommendations for policy and co-management changes. In January 2025, the Office of the Secretary of the Interior acknowledged that administrative boundaries and jurisdictions do not support effective subsistence management of the entire salmon life cycle and requests Council suggestions.

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The Board has since received additional Council recommendations regarding statutory changes, interdepartmental coordination, and trawl fleet efficiencies to reduce salmon bycatch. These, along with previously referenced letters, were all sent to the new Secretaries in March 2026.

To continue this important discussion, on August 3, OSM hosted a much-requested workshop with Council Chairs regarding the Alaska Salmon Crisis prior to the Board's 2026 summer work session that took place August 4-5. The Board is committed to requesting an annual meeting with the Secretaries to discuss important subsistence issues such as this that fall outside of the Board's jurisdiction. Until we have further guidance, we continue to encourage the Councils to engage directly with other regulatory bodies such as Alaska Board of Fisheries and the NPFMC. The Board will follow up on Council requests made to the Office of the Senior Advisor for Alaska Affairs at the April 2026 wildlife regulatory meeting to request interdepartmental engagement between the Department of the Interior and Department of Commerce (NOAA NPFMC) at the workshop.

We recognize that you are uniquely positioned to offer first alerts to changing conditions and important trends that impact subsistence in your region. The Board appreciates and values the traditional knowledge, observations, and expertise you share. We make informed decisions thanks to the knowledge that you provide.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts. Federally qualified subsistence users of the Seward Peninsula Region are well represented through your work.

Sincerely,

Anthony Christianson  
Chair

Enclosure: R7 SP ARR Topic 3 Encl 1 – Factors Influencing Caribou Migration References List

cc: Seward Peninsula Subsistence Regional Advisory Council  
Federal Subsistence Board  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game  
Administrative Record

## **Factors Influencing Caribou Migration**

Many factors have the potential to affect caribou migration including temperature, precipitation, herd size, snow conditions, range condition, the individual caribou's condition, and human activity. The National Park Service (NPS) has produced an extensive number of papers and reports investigating factors that influence caribou migrations. These reports are listed below and are publicly available, copies can be requested from the NPS.

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