

## Seward Peninsula Subsistence Regional Advisory Council

c/o Office of Subsistence Management  
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In Reply Refer To:  
RAC/SP.23016.NP

Anthony Christianson, Chair  
Federal Subsistence Board  
c/o Office of Subsistence Management  
1011 E. Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Seward Peninsula Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2022 Annual Report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At the Council's fall public meetings held in Nome on October 4-5, 2022, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 22-23, 2023 meeting. The Council wishes to share information and raise concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Seward Peninsula Region.

### **1. Resident Caribou Herd in the Northern Seward Peninsula**

The Council discussed the presence of a resident caribou or reindeer population in the northern Seward Peninsula. This topic was previously brought up on the FY-2021 Annual Report to the Board. During its Fall 2021 meeting, the Council heard from the Alaska Department of Fish and Game (ADF&G) on the estimated population and movement of this resident herd. At that time, the ADF&G stated that no genetic research had been done on this herd to determine if it is comprised of rogue reindeer, members from the Western Arctic Caribou Herd (WACH), or a mix of both. Furthermore, no work has been done to determine if this resident population affects the migration of the WACH.

#### **Recommendation:**

In the FY-2021 Annual Report Reply (Report Reply), the Board acknowledged this request for additional information. It stated that the Bering Land Bridge National Preserve (BELA) recognized the presence of this resident herd but noted its population status and extent of its

range was unknown. The Report Reply specified that BELA staff would initiate Tribal consultations, conduct a literature review, and engage with staff from the University of Alaska, Fairbanks Reindeer Research Program to learn what genetic work has been accomplished with reindeer on the northern Seward Peninsula. The Council requests that this work be started as the Report Reply further stated that these efforts are attainable within the near future and that information will be brought forward to the Council.

## **2. Impact to Marine Mammals in the Bering Sea and Aleutian Islands Trawl Fleet Fishery**

The Council has recently become aware that many traditionally important marine mammal species are caught and discarded as bycatch in the Bering Sea and Aleutian Islands Trawl Fleet Fishery (BSAI). The National Oceanic Atmospheric Administration (NOAA) fisheries website states that in 2022, NOAA observers recorded harbor seals, humpback whales, ribbon seals, ringed seals, and Stellar sea lions killed or injured as the BSAI fishery was conducted. This is of grave concern to the Council as marine mammals are heavily relied upon as subsistence foods by subsistence users and are of vital importance to this region and its culture. Marine mammals are federally protected animals under the Marine Mammal Protection Act of 1972, and many culturally important marine mammal species are already in a population decline.

### **Recommendation:**

The Council requests that the Board be made aware of this bycatch harvest and asks the Board to direct Federal agencies to review whether the current practice violates the Marine Mammal Protection Act and other protections in place for marine mammals that prohibit the take of these animals other than by Alaska Natives. The Council also requests that these agencies review any current bycatch numbers and caps on marine mammals in the BSAI fishery and report back to the Council with information on this topic.

## **3. Update to the Alaska Beluga Management Plan**

The Council would like to inform the Board that the Alaska Beluga Whale Committee (ABWC) is currently updating the Alaska Beluga Whale Management Plan (ABWMP). The ABWC is a co-management committee made up of representatives from approximately 30 communities that harvest beluga whales, as well as Federal and State managers and scientists. The intent of the ABWC is to manage beluga whales for sustainability, and the updated plan will assist with this intent. The updated ABWMP will have harvest number targets, as well as list areas of biological importance to the species, such as calving and molting areas. The ABWMP is currently out for review in the communities that harvest beluga whales.

### **Recommendation:**

None at this time, the Council would just like the Board to be aware of these ongoing efforts.

The Seward Peninsula Subsistence Regional Advisory Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues

and concerns of subsistence users in the Seward Peninsula Region. If you have any questions regarding this report, please contact me via Nissa Pilcher, Subsistence Council Coordinator, Office of Subsistence Management, at [nissa\\_batespilcher@fws.gov](mailto:nissa_batespilcher@fws.gov), or 1-800-478-1456 or (907)455-1847.

Sincerely,

Louis H. Green, Jr.  
Chair

cc: Federal Subsistence Board  
Seward Peninsula Subsistence Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record