

**Northwest Arctic Subsistence Regional Advisory Council**  
c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 787-3888, Fax: (907) 786-3898  
Toll Free: 1-800-478-1456

In Reply Refer To:  
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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 Northwest Arctic Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2021 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 its public meetings held via teleconference on November 1-2, 2021, the Council identified concerns and recommendations for this report. The Council approved this annual report at its February 14-15, 2022, meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Northwest Arctic Region.

**1. Lack of Success in Harvesting Caribou in Unit 23 by Federally-Qualified Subsistence Users Due to Changes in Caribou Migration Patterns and the Associated Effects of Guides/Transporters and Climate Change on the Western Arctic Caribou Herd**

Many communities across our region have been unable to successfully harvest caribou during the typical fall season when we traditionally hunt. For example, this meeting being held in the first week of November and many communities are still waiting and have not seen caribou yet. We believe this is caused in part by people coming from outside the region to hunt caribou at the same time Federally qualified subsistence users are hunting caribou in the traditional season when the caribou come through. Sport hunters are able to fly ahead of the herd and interrupt and deflect the caribou migration pattern. Climate change is also having an impact on the caribou and their migration. The longer summers, warmer winters, rain on snow events, and thin river ice seems to be having an effect on the caribou behavior and movements. Winters used to be consistently cold, well below zero, and now we don't see that anymore. This year the caribou wintered around Anaktuvuk Pass and the Noatak Valley when they used to winter around Buckland. The caribou movements seem to be hap-hazard, they are not following their usual migration timing and routes. There is also evidence of radio collared caribou being deflected by the Red Dog Mine Road. There are so many

stressors on the caribou that it is imperative to protect the caribou as best possible and ensure that subsistence hunters have a priority to be able to feed their family and community.

The Council requests ongoing monitoring of the caribou herd and more information on permitting for guided hunts and transporters on Federal public lands in Unit 23. The Council submitted WSA21-01 to restrict hunting of caribou to only Federally qualified subsistence users on Federal lands for just the specific period of time when the fall caribou migration is essential to local communities. The circumstances are dire – many communities are not seeing caribou on their usual migratory routes as they usually do and hunters have to travel very far at great expense and may not be successful. We survive on caribou. Food insecurity is real – rural communities do not have access to other healthy foods to replace caribou. It is imperative to the health and wellbeing of rural communities that subsistence opportunity and subsistence priority is protected on Federal lands.

The Council is extremely concerned about the potential for dramatic decline of the caribou herd as was experienced back in the 1970's when subsistence caribou harvest was essentially closed. A combination of western science and local traditional knowledge is necessary to monitor and inform management of the Western Arctic Caribou herd throughout its range.

The Council calls for the Federal Subsistence Board to further engage with local rural communities and talk with people about their on the ground experience and observations. Incorporating traditional knowledge, both current and historic observations handed down through the generations, is essential to the sound management of this caribou herd and assuring the continuation of subsistence now and for future generations.

**2. Need for Arctic Grayling and Salmon Research in Unit 23**

Arctic Grayling is a very important subsistence fish resource. However, it has been many years since any studies were conducted on Grayling in the Northwest Arctic region. The Council requests that this be pursued as a research priority for funding under the Fisheries Resource Monitoring Program or other fisheries research initiatives. Similarly, salmon is an extremely important subsistence fish resource, and the Council would like to receive updated reports on the status of salmon populations in the region. Ongoing subsistence salmon monitoring programs are important.

**3. Request For Updated Reports on Population Change in Moose and Beaver**

The Council is very concerned about the decline in the moose population. Moose are a critical subsistence resource for communities especially in times when the caribou are scarce. The Council requests ongoing monitoring and population surveys for moose in Unit 23 and regular reports at the Council meetings.

Conversely, beaver populations are rapidly increasing and expanding. The Council requests to receive reports on the extent of beaver expansion, discuss interaction with other subsistence resources, and ensure the subsistence opportunity for the hunting and trapping of beaver is expanded as the population grows.

**4. Need to Have RAC Representatives Attend the Ambler Mine Access Road Meetings**

The Council is very concerned about the Ambler Mine Access Road and impacts the road will have on caribou and other critical subsistence resources. The Council requests comprehensive reports on the planned road development and representatives of the agencies leading the road development to address the Council at our meetings. Further the Council would like to have Council members have representation at Ambler Mine Access Road meetings.

**5. Request for RAC Representation on the Western Arctic Caribou Herd Working Group**

The Council requests that the Federal Subsistence Regional Advisory Councils have representation on the Western Arctic Caribou Herd (WACH) Working Group. This caribou herd is one of most important subsistence resources for the Northwest Arctic region, but currently there is not a Federal subsistence seat on the WACH Working Group. In the interim the Council requests support from the Federal Subsistence Management Program so a RAC member can travel to attend the WACH Working Group meetings and have the opportunity to at least participate in the public meeting on behalf of the Council.

**6. Concern about Current Council Membership and Need for Representation From the Upper Kobuk River Villages and From Selawik**

The Council is very concerned about current vacancies on the Council and lack of representation from communities in the heart of the Western Arctic Caribou Herd. Because of the movement of the caribou herd through these regions is essential to subsistence communities, their observations and input is critical to the Council's effectiveness when addressing caribou management concerns. The Council requests the support of the Federal Subsistence Program to conduct outreach to these communities and encourage applications to serve on the Northwest Arctic Subsistence Regional Advisory Council.

**7. Request for Engagement with Elder Support/Subsistence Programs Conducted by the Maniilaq Association**

Maniilaq, the regional Native non-profit corporation serving 12 Federally Recognized Tribes in the Northwest Arctic region, helps support rural communities through a traditional foods program. Through this program they provide funds for gas and hunting supplies for each village in support of local hunters to provide for their community. The Council requests the Federal subsistence program engage with these local subsistence initiatives and invites Maniilaq to provide a report at our next meeting. These programs can provide important information such as traditional knowledge to inform management of caribou and moose and also have key insights into whether subsistence harvest needs are being met for each community.

The Northwest Arctic 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 Northwest Arctic Region. If you have any questions regarding this report, please contact me via Katerina (Katya) Wessels, Council Coordination Division Supervisor, Office of Subsistence Management, at katerina\_wessels@fws.gov, or 1-800-478-1456 or 1-907-786-3885.

Sincerely,

Thomas Baker  
Chair

cc: Federal Subsistence Board  
Northwest Arctic 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