

North Slope Subsistence Regional Advisory Council
c/o U.S. Fish and Wildlife Service
1011 East Tudor Road, MS 121
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JUL 29 2013

Mr. Tim Towarak, Chair
Federal Subsistence Board
c/o U.S. Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Tim Towarak:

The North Slope Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit this annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) and section 805(c) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meeting on August 14, 2012, in Barrow, the Council identified concerns and recommendations for its FY 2012 report. The Council approved this letter at its February 26-27, 2013 public meeting in Barrow. The Council understands and supports the importance of addressing fish and wildlife resource topics annually, expressing its concerns, and addressing long term planning needs that are not addressed through the regulatory cycles throughout the year. The Council looks forward to your continued guidance and support on the issues listed below.

1) Potential impacts to caribou and fish from the proposed "Road to Umiat"

The Council would like to see a full subsistence impacts investigation and review of the Foothills West Transportation Access Project (locally referred to as the "Road to Umiat"). While the Council recognizes that this is a project proposed by the State of Alaska (Alaska Department of Transportation and Public Facilities) and is primarily on State lands, there will likely be Federal involvement with the project in the form of permitting or other authorizations. Caribou and fish that are essential for subsistence have migratory pathways that cross the area where the road is projected to be located. The proposed road will cross the foothills north of the Brooks Range for approximately 110 miles in a northwest direction, from approximately Milepost 278 of the Dalton Highway to Umiat, Alaska. The purpose of the proposed road is to promote oil and gas exploration and development within the Western Foothills Province including the National Petroleum Reserve-Alaska (NPR-A), and will cross State, Federal and Arctic Slope Regional

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Corporation (ASRC) land with extensive wetland areas and four major rivers; the Itkillik, Anaktuvuk, Chandler, and Colville.

The Council views the engagement of the Federal Subsistence Management Program and the Federal Subsistence Board as essential in this review since the Western Arctic, Teshepuk, and Central Arctic Caribou herds use some portion of the proposed road development region. The Council is concerned the road will bisect and disrupt caribou migratory routes and also cross major rivers important to subsistence fisheries. The Council would also like the Board to consider the impacts of the potential for increased sport hunting pressures on subsistence harvests, if the road opens up vehicle access to the region. There is historical evidence that increased hunting pressure will likely occur, from the Dalton Highway (which was asserted would forever remain closed to the public) and the Hickel Highway (which so increased sport hunting pressure, the community of Anaktuvuk Pass joined in a lawsuit to close it).

2) Review of haul road (Dalton Highway) hunting access impacts to Caribou.

The Council would like to see an evaluation of the Dalton Highway road access and increased hunting pressures on the caribou herds. The Council is concerned that migratory caribou important to subsistence that originate on Federal lands are impacted by increasing disturbance and hunting pressures along the Dalton Highway. Hunter education should be conducted to limit harassment and harm from bow hunters, citing observations of caribou wounded but not killed by arrows. The Council would also like to see education of all hunters on the local etiquette of “letting the leaders pass” referring to their own indigenous knowledge that the lead caribou at the head of the migration play a critical role in guiding the herd to good feeding, calving, and wintering grounds.

Additionally, the Council is very concerned about increasing traffic and access to waterways of the Dalton Highway since its designation as a Scenic Byway. Council members and members of the public feel they did not have adequate opportunity to provide input on the public process in the Scenic Byways designation, and stress that the program of encouraging use of the highway as an access route to remote lands and rivers in the region does have a direct impact on subsistence by increasing hunting pressure and disturbance of wildlife.

The Council is also concerned that the pipeline is exposed to open public access all along the highway and not monitored for safety. The Council would like to see a monitoring program in place to detect any potential problems or leaks and prevent any direct acts of vandalism. Any spills resulting from accidental or intentional breaches of the pipeline would be detrimental to caribou, rivers, and other important subsistence resources and should be monitored on a regular basis to prevent any such harm from occurring.

3) Establishment of safety cabins for subsistence activities in remote access areas

The Council would like to see consideration for the building of “safety cabins” for remote access

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areas in predominantly Bureau of Land Management lands typically utilized for subsistence hunting and fishing activities.

Changing weather conditions in recent years have brought about increasingly frequent and severe storms as well as changing land and water/ice conditions, making travel more hazardous during times when subsistence harvests are normally conducted. Strategic placement of such public use safety cabins could assist local hunters in conducting normal seasonal subsistence activities with some opportunity for safety during increasingly unpredictable and inclement weather. The Council also seeks suggestions for possible sources of funding to build such cabins.

Thank you for the continued opportunity to assist the Federal Subsistence Management Program in meeting its obligations to protect subsistence uses of fish and wildlife resources on Federal lands in our region. The Council looks forward to continued discussions about the issues and concerns of subsistence stakeholders of the North Slope region. If you have any questions regarding this correspondence, please contact Eva Patton, Subsistence Council Coordinator, Office of Subsistence Management at 1-800-478-1456 or (907) 786-3358.

Sincerely,

/S/

Harry K. Brower
Chair

cc: Federal Subsistence Board
North Slope Alaska Subsistence Regional Advisory Council
Kathleen M. O'Reilly-Doyle, Acting Assistant Regional Director, OSM
David Jenkins, Acting Deputy Assistant Regional Director, OSM
Carl Johnson, Council Coordination Division Chief, OSM
Interagency Staff Committee
Administrative Record