

**North Slope Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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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 North Slope Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2020 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 4-5, 2020, the Council identified concerns and recommendations for this report. The Council approved this annual report at its winter 2021 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA, the Federal Subsistence Management Program engagement with subsistence communities, and the continuation of subsistence uses in the North Slope Region when faced with environmental change. Several of these topics have been brought forth in previous annual reports and are re-addressed here to upraise the new Board members and Federal subsistence staff.

**1. Environmental change impacts to healthy subsistence resources and management strategies to address subsistence food security**

The Council feels it is imperative to again address climate change in this annual report to the Board. We have had extensive discussions about the importance of caribou, sheep, moose, fish, and other subsistence resources to communities across the North Slope Region and expressed concern about climate change and cumulative industrial development impacts on these critical resources. The Council is very concerned about these ongoing and increasing impacts to communities' subsistence resources and subsistence way of life. Many fish and wildlife populations across the North Slope Region are experiencing a decline or exhibiting signs of stress such as increased incidence of fish mold, seabird die-offs, and sick seals. The Council is very concerned that these ongoing changes to the lands and waters across the North Slope as well as in the marine environment will continue causing decline to critical subsistence fish and wildlife populations and interfere with conducting subsistence safely. The Council will continue encourage the Board to recognize the need for food security in these uncertain times and ensure

that subsistence priority is indeed prioritized in order to meet these needs.

## **2. Challenges of multi-layered subsistence management and effective means for addressing subsistence information and concerns**

The Council works diligently to address the subsistence issues and concerns of North Slope Region communities. Yet, the Council is challenged in the limited scope of the Federal Subsistence Management Program, addressing only fish and wildlife management on Federal public lands. Subsistence foods and the subsistence way of life are holistic and integral to the community and culture of the region. Many Council members are engaged in subsistence management and participate in other advisory bodies in order to make sure their voices are heard in regards to all critical subsistence issues. Council members are volunteers and must participate in or monitor countless meetings affecting subsistence use: separate meetings for migratory birds, marine mammals, whaling, industrial development scoping under the National Environmental Policy Act, NPR-A drill permitting, pipeline and roads development, climate change research and monitoring, in addition to State Advisory Committee and Alaska Board of Game meetings for management on State lands, Bureau of Oceans and Energy Management and National Marine Fisheries Service meetings for marine fisheries and monitoring not under the jurisdiction of USFWS, and so on.

While the Council recognizes the limitations of the Board's authority due to the current structure of the Federal and State laws that govern natural resource management, the Council asks for greater understanding and awareness of the integrated nature of subsistence in the lives of people in the North Slope region. There are several aspects where the Federal Subsistence Management Program can be more engaged to better support the concerns of the Council and community and provide:

- 1) Consideration and understanding of local culture and communication norms and support the Council and public in this regard.
- 2) Consideration and inclusion of local and traditional knowledge in subsistence management. Council members are appointed based on their expert knowledge of the region and long-term engagement with subsistence; include the information shared by the Council, Tribes, and local public in management decision making.
- 3) Understanding and support for community, regional sharing and trade of subsistence foods and materials. Subsistence management approaches that support and uphold these traditional sharing practices essential to the wellbeing of our communities.
- 4) Understanding and awareness of the interaction of all subsistence foods and activities. For example, when important subsistence foods such as walrus or whale are not harvested, there is a greater need for other foods such as caribou and fish to sustain communities for the year. The Federal Subsistence Management Program must understand the interrelated nature of subsistence harvests – impacts to one affect the need for and subsequent management of another.

- 5) Understanding and awareness of the interaction of industrial development with subsistence activities. While the Federal Subsistence Management Program does not have direct jurisdiction over development activities on the North Slope, impacts to subsistence foods on Federal public lands is a direct concern of the program. These impacts include barriers to migratory routes, disturbances that deflect or stress animals, or contaminants that may impact subsistence foods. All of these have direct bearing on access to, harvest and safe consumption of important subsistence foods that the Federal Subsistence Management Program does manage. Additionally, the Federal Subsistence Management Program can look for better ways to engage with Federal agencies involved in those activities, which might assist with proper execution of the analyses and obligations mandated in ANILCA Section 810.
- 6) Awareness and monitoring of climate change impacts to subsistence. The Council and communities have shared observations and experiences of changes to the North Slope Region lands, waters, and weather that are already impacting subsistence activities, safe access, timing, and changes to critical habitat for many important subsistence species managed by the program. The Council asks for awareness on how these changes impact subsistence (e.g., flexible management approaches that can accommodate changing timing of subsistence activities due to storm severity or ice up/break-up or seasonality of harvest due to changing timing of migrations or rut). The Councils also asks for greater support and networking to monitor climate change and address research priorities identified by the Council.

### **3. Board decision making process and deference to Council's recommendations**

The Council is interested in learning more about the current members of the Board and how their background assists them in serving as the decision makers for the Federal Subsistence Management Program. The Council wishes to gain a better understanding of how decisions are made by the Board and the criteria used when taking action on Council recommendations regarding subsistence priority and continuation of subsistence uses. The Council is specifically interested in learning what "deference" to Council recommendations means to the Board and what has been done to expand that deference pursuant to the 2009 Secretarial Review.

The North Slope 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 North Slope Region. If you have any questions regarding this report, please contact me via Eva Patton, Subsistence Council Coordinator, Office of Subsistence Management, at [eva\\_patton@fws.gov](mailto:eva_patton@fws.gov), or 1-800-478-1456 or (907) 786-3358.

Sincerely,



Gordon Brower  
Chair

- cc Federal Subsistence Board
  - North Slope Subsistence Regional Advisory Council
  - Sue Detwiler, Assistant Regional Director, Office of Subsistence Management
  - Lisa Maas, Wildlife Division Supervisor, Office of Subsistence Management
  - Tom Kron, Statewide Support Division Supervisor, Office of Subsistence Management
  - George Pappas, State Subsistence Liaison and acting Fisheries Division Supervisor,  
Office of Subsistence Management
  - Pippa Kenner, acting Policy Coordinator, Office of Subsistence Management
  - Brent Vickers, Anthropology Division Supervisor, Office of Subsistence Management
  - Katerina Wessels, Supervisory Program Analyst, Council Coordination Division,  
Office of Subsistence Management
  - Eva Patton, Subsistence Council Coordinator, Office of Subsistence Management
  - Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
  - Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
- Interagency Staff Committee
- Administrative Record