

**Seward Peninsula Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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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 Seward Peninsula Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY2021 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 October 26-27, 2021, the Council identified concerns and recommendations for this report. [The Council approved this annual report at its March 3-4, 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 Seward Peninsula Region.

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

At its fall meeting held October 26-27, 2021, the Council heard from multiple individuals regarding caribou and reindeer on the northern Seward Peninsula. Alaska Department of Fish and Game (ADF&G) biologists Alex Hansen and Bill Dunker discussed the current status of the Western Arctic Caribou Herd (WACH) and shared some perspectives on the caribou and/or reindeer that may now represent a resident herd in the northern portion of Unit 22. According to ADF&G, caribou and/or reindeer can be found year-round on the Seward Peninsula. It is unknown, however, if caribou from the WACH have mingled in with local reindeer, if these animals migrate intermittently with the larger WACH, or if they now permanently inhabit the area. There are an estimated 3,000-5,000 animals that appear to be in the area year-round. There has been no research conducted to confirm if the herd is comprised more of rogue reindeer or caribou that dispersed from the WACH and no longer migrate.

Council members mentioned that there are caribou or a hybrid of caribou-reindeer towards Serpentine Hot Springs in Bering Land Bridge National Preserve. They inquired on the status of

caribou distributed on the northern peninsula, and expressed concern that the sedentary population may deter migrating caribou from these wintering grounds, and prevent the traditional north-south WACH migration.

*Recommendation:*

The Council is requesting that ADF&G and Federal agencies initiate research on what appears to be a resident herd of caribou and/or reindeer in the northern Seward Peninsula. Collaring animals will provide a better understanding of whether or not these animals migrate. Genetic research will help identify whether these animals are reindeer or caribou, and possibly their origin.

The purpose of including the Council's concerns in the Annual Report is to alert the Board that the Council is bringing up questions and concerns of caribou residing in the northern Seward Peninsula year-round.

## **2. Bering Sea-Western Interior Planning Area Environmental Impact Statement**

The Council brought up concerns regarding land use in the Unalakleet, Golovin, and Golsovia drainages following the signing of the Bering Sea-Western Interior Environmental Impact Statement on January 15, 2021. Several Council members expressed apprehension that the Areas of Critical Environmental Concern (ACEC) and the lifting of Public Land Orders (PLO) were not comprehensively addressed in the environmental impact statement (EIS). This could lead to potential impacts on subsistence resources if mining activities were to be conducted in the Unalakleet, Golovin, and Golsovia drainages. The Council is particularly concerned about mining activities reducing lichen availability in areas where caribou and reindeer graze. The Council also worries about impacts to anadromous fish streams due to potential mining activities.

According to Bureau of Land Management (BLM) staff, most of the PLOs were set aside under ANILCA and the Alaska Native Claims Settlement Act (ANCSA). The EIS addressed which PLOs will remain in effect or be lifted. Therefore, if PLOs are lifted, Federal mining claims can be staked within areas that are critical to subsistence activities and resources. Currently, BLM has not lifted any of the PLOs. This is done at the Secretary of Interior level. The lands are currently not open to mineral entry, but have the potential to be.

*Recommendation:*

The Council requests that these concerns be elevated to the Secretary of the Interior through the Board to keep PLOs in place to protect subsistence activities and resources.

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 Karen Deatherage, Subsistence Council Coordinator, Office of Subsistence Management, at karen\_deatherage@fws.gov, or 1-800-478-1456 or 907-351-0083.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Green, Jr.", written in a cursive style.

Louis 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