

STAFF ANALYSIS
WSA16-01

ISSUES

Temporary Special Action Request WSA16-01, submitted by the Northwest Arctic Subsistence Regional Advisory Council, requests that Federal public lands in Unit 23 be closed to caribou hunting by non-Federally qualified subsistence users during the 2016/17 regulatory year, beginning July 1, 2016.

DISCUSSION

The proponent is concerned about the health of the Western Arctic caribou herd (WACH) population, the potential for further decline, and the lack of recent population data. The proponent states that hunting by non-Federally qualified subsistence users, coupled with the WACH population decline is negatively affecting Federally qualified subsistence users' ability to harvest caribou. The proponent states that the requested closure is necessary for conservation purposes.

Existing Federal Regulations

Unit 23—Caribou*

*15 caribou per day; however, cow caribou may not be taken May 16– July 1–June 30.
June 30*

***Temporary Special Action WSA15-03 made changes to Unit 23 caribou regulations for the 2015/2016 regulatory year, reducing the harvest limit to 5 caribou per day with a bull season of Feb. 1 – Oct. 14 and a cow season of Jul. 1 – Mar. 31. Cows with calves may not be harvested Jul. 1 – Oct. 10.**

Proposed Federal Regulations

Unit 23—Caribou

*15 caribou per day; however, cow caribou may not be taken May 16– July 1–June 30.
June 30*

Federal public lands are closed to the harvest of caribou except by Federally qualified subsistence users hunting under these regulations.

Existing State Regulations

Unit 23—Caribou

<i>23, north of and including the Singoalik River drainage</i>	<i>Residents—5 caribou per day; however, calves may not be taken.</i>	
	<i>Bulls</i>	<i>July 1-Oct. 14 Feb. 1-June 30.</i>
	<i>Cows</i>	<i>Jul. 15-Apr. 30</i>
	<i>Nonresidents—1 bull; however, calves may not be taken</i>	<i>Aug. 1-Sept. 30</i>
<i>23 remainder</i>	<i>Residents—5 caribou per day; however, calves may not be taken.</i>	
	<i>Bulls</i>	<i>July 1-Oct. 14 Feb. 1-June 30.</i>
	<i>Cows</i>	<i>Sept. 1-Mar. 31.</i>
	<i>Nonresidents—1 bull; however, calves may not be taken</i>	<i>Aug. 1-Sept. 30</i>

Extent of Federal Public Lands

Federal public lands comprise approximately 69% of Unit 23 and consist of 42% National Park Service (NPS) managed lands, 18% Bureau of Land Management (BLM) managed lands, and 10% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit 23 Map**).

Customary and Traditional Use Determinations

Residents of Unit 21D west of the Koyukuk and Yukon Rivers, Galena, 22, 23, 24 including residents of Wiseman but not including other residents of the Dalton Highway Corridor Management Area, and 26A have a customary and traditional use determination for caribou in Unit 23.

Regulatory History

In 1988, the Alaska Board of Game established the Noatak Controlled Use Area (CUA), which was expanded in 1994 (Betchkal 2015, Halas 2015). The Noatak CUA consists of a 10-mile wide corridor along the Noatak River from its mouth to Sapun Creek and is closed from Aug. 15-Sept. 30 to the use of aircraft in any manner for big game hunting. Approximately 80 miles of the Noatak CUA are within Noatak National Preserve (Betchkal 2015).

In 1995, the Federal Subsistence Board (Board) adopted Proposal P95-51 to increase the caribou harvest limit from 5 to 15 caribou per day so that subsistence hunters could maximize their hunting efforts when caribou were available (FWS 1995a).

In 1997, the Board adopted Proposal P97-66 with modification to provide a customary and traditional use determination for caribou in Unit 23 for rural residents of Unit 21D west of the Koyukuk and Yukon rivers, Galena, Units 22, 23, 24 including residents of Wiseman, but not other residents of the Dalton Highway Corridor Management Area and Unit 26A (FWS 1995b, 1997).

In 2000, the Board adopted Proposal WP00-53 with modification allowing the use of snowmachines to position a hunter to select individual caribou for harvest in Units 22 and 23. This was done to recognize a customary and traditional practice in the region (FWS 2000a).

ANILCA Title VII §815.3 authorizes restricting nonsubsistence taking of fish and wildlife on Federal public lands only if necessary for the conservation of healthy fish and wildlife populations, to continue subsistence use, or pursuant to other laws. In 2007, the Board adopted a policy on closures to hunting, trapping, and fishing on Federal public lands and waters in Alaska. The intent of the closure policy was to summarize and clarify the circumstances under which the Board has the authority to restrict or close Federal public lands to the harvest of fish and wildlife under existing statutes (ANILCA) and regulations. This policy allows establishment or retention of closures “. . .for the conservation of healthy populations of fish and wildlife resources; or to continue subsistence uses of those populations; or for public safety or administrative reasons, or ‘pursuant to other applicable law’” (OSM 2007, pg. 1).

In 2012, the NPS established a ‘delayed entry zone’ in the western portion of the Noatak National Preserve (Halas 2015, Ackerman and Fix 2015). Within the delayed entry zone, transporters can only transport non-Federally qualified caribou hunters after September 15. The purpose of this zone is to allow a sufficient number of caribou to cross the Noatak River, establishing migration routes and to allow local hunters the first opportunity to harvest caribou in that area (FWS 2014).

In 2013, an aerial photo census indicated significant declines in the Teshekpuk Caribou herd (TCH), WACH, and possibly the Central Arctic Caribou Herd (CACH) populations (Caribou Trails 2014). In response, the Alaska Board of Game adopted modified Proposal 202 (RC76) in March 2015 to reduce harvest opportunities for both residents and nonresidents of Alaska within the range of the WACH and the TCH. These regulation changes – which included lowering bag limits for nonresidents, reductions in bull and cow season lengths, the establishment of new hunt areas, and prohibiting calf harvest – were adopted to slow or reverse the population decline. The regulatory changes took effect on July 1, 2015.

In 2015, four special actions, WSA15-03/04/05/06, submitted by the North Slope Subsistence Regional Advisory Council, requested changes to caribou regulations in Units 23, 24, and 26 and were approved with modification by the Board, effective July 1, 2015. Temporary Special Action WSA15-03, requested designation of a new hunt area for caribou in the northwest corner of Unit 23 where the harvest limit was reduced from 15 to 5 caribou per day, the harvest season was reduced for bulls and cows, and the take of calves was prohibited. The Board did not establish a new hunt area and also prohibited the take of cows

with calves. These State and Federal regulatory changes represent the first time in over 30 years that harvest restrictions have been implemented for the WACH.

Current Events

Five proposals concerning caribou regulations in Unit 23 were submitted to the Board for the 2016-2018 wildlife regulatory cycle. Proposal WP16-61, submitted by the North Slope Subsistence Regional Advisory Council, mirrors Temporary Special Action WSA15-03 described above.

Proposal WP16-37, submitted by Jack Reakoff, requests that Federal caribou regulations mirror the new State regulations across the ranges of the WACH and TCH (Units 21D, 22, 23, 24, 26A, and 26B).

Combined Proposals WP16-49 and WP16-52, submitted by the Northwest Arctic Subsistence Regional Advisory Council and the Upper and Lower Kobuk Advisory Committee, request reductions in harvest limits for caribou in Unit 23, restrictions on bull and cow seasons, and a prohibition on the harvest of cows with calves.

Proposal WP16-48 requests that Federally qualified subsistence users be allowed to use snowmachines to position a caribou, wolf, or wolverine for harvest in Unit 23.

A public hearing for WSA16-01 was held in Kotzebue, AK on February 23rd of this year. Numerous local residents, non-local residents, and agency personnel provided comments in person and via teleconference. Participants voiced both support and opposition for the special action request.

Several participants expressed concerns over airplanes and non-local hunters disrupting caribou migration and local subsistence hunts, stating that the special action request is necessary for the preservation of the herd and to help local people. Others emphasized the spiritual and nutritional importance of caribou to local people and the immense hardship of the recent, low caribou harvests experienced by residents of some villages.

Other participants stated that this special action request was premature and that harvest by non-Federally qualified subsistence users was too low to have any meaningful conservation impact. Several participants expressed discontent because people, who grew up in the region but currently live in urban areas, would not be able to “come home” to hunt on Federal public lands. Others stated that transported hunters donate a lot of meat to local villages and that clients are already booked for next season’s hunt. Another concern was that user conflicts may increase on State lands as non-local hunters could become concentrated on those lands. However, the vast majority of those present at the public hearing were in support of the special action request.

Tribal/ANCSA consultations on WSA16-01 were conducted on February 25th of this year. Numerous tribal members, OSM staff, and Interagency Staff Committee (ISC) members participated in the consultation. Several participants voiced support for the special action request. No opposition to the special action request was voiced.

Several participants asked if former village residents who currently live in urban centers of the state could come back and hunt under Federal subsistence regulations if the special action was approved by the Board. OSM staff clarified that they would not be considered Federally qualified subsistence users under those circumstances and thus, could not hunt on Federal public lands in Unit 23 should the special action be approved, but that they could still hunt on State and native corporation lands.

Participants also expressed concerns over outside hunters and planes impacting caribou migration and the effect these activities have on caribou harvest by local hunters. In addition, some participants expressed concern about the patchwork of land ownership in the area and the possibility of not knowing if they were on State or Federal land while hunting. Others were concerned about how effective law enforcement would be in enforcing the closure if the special action was approved. Another concern addressed outreach and how the closure would be communicated to hunters, if approved.

WSA16-01 was presented to all Regional Advisory Councils whose residents have a customary and traditional use determination for caribou in Unit 23 at the All Council meeting, which was held in Anchorage from March 7-11, 2016. The Seward Peninsula Council opposed WSA16-01 due to lack of a conservation concern. The Western Interior Council took no action on WSA16-01, deferring to the “home” Councils.

WSA16-01 was presented to the Northwest Arctic and North Slope Councils during a joint session. Both Councils unanimously supported WSA16-01, stating that this request is necessary now to prevent a population crash and to help local people, and that the longer the Board waits to act, the harder it will be to rebuild the caribou population. The Councils also noted that low caribou harvests due to the declining caribou population, aircraft disturbances, and conflicts with non-local users are hurting villages. A Council member from Noatak gave specific testimony regarding issues Federally qualified subsistence users in his area have been having with outside hunters. In particular, he discussed how transporter flights have increased dramatically over the last 10 to 15 years and that they were bringing in more and more nonlocal hunters that were not only having a negative impact on herd migration, but that were also resulting in a concentration of hunters on the communities traditional hunting grounds. This concentration of hunters into such a small area was preventing local users from harvesting caribou.

Biological Background

Caribou abundance naturally fluctuates over decades (Gunn 2001, WACH Working Group 2011). Gunn (2001) reports the mean doubling rate for Alaskan caribou as 10 ± 2.3 years. Although the underlying mechanisms causing these fluctuations are uncertain, Gunn (2001) suggests climatic oscillations as the primary factor, exacerbated by predation and density-dependent reduction in forage availability, resulting in poorer body condition.

Caribou calving generally occurs from late May to mid-June (Dau 2013). Weaning generally occurs in late October and early November before the breeding season (Taillon et al. 2011). Calves stay with their mothers through their first winter, which improves calves' access to food and body condition (Holand et al. 2012). Calves orphaned after weaning (October) have greater chances of survival than calves orphaned before weaning (July 2000, Russell et al. 1991, Rughetti and Fest-Bianchet 2014, Holand et al. 2012).

The TCH, WACH, and CACH have ranges that overlap in Unit 26A (**Figure 1**), and there can be considerable mixing of herds during the fall and winter. During the early 2000s, the number of caribou wintering on the North Slope peaked at over 700,000 animals (this includes the Porcupine Caribou Herd in northeast Alaska and Northwest Territories, Canada), which may be the highest number since the 1970s. During the 1970s, there was little overlap between these four herds, but the degree of mixing seems to be increasing (Lenart 2011, Dau 2011, Parrett 2011).

The WACH has historically been the largest caribou herd in Alaska and has a home range of approximately 157,000 square miles in northwestern Alaska (**Figures 1, 2**). In the spring, most mature cows move north to calving grounds in the Utukok Hills, while bulls and immature cows lag behind and move toward summer range in the Wulik Peaks and Lisburne Hills (**Figure 2**, Dau 2011, WACH Working Group 2011).

Dau (2013) determined the calving dates for the WACH to be June 9-13. This is based upon long-term movement and distribution data obtained from radio-collared caribou (these are the dates cows ceased movements). After the calving period, cows and calves move west toward the Lisburne Hills where they mix with the bulls and non-maternal cows. During the summer the herd moves rapidly to the Brooks Range.

In the fall, the herd moves south toward wintering grounds in the northern portion of the Nulato Hills. The caribou rut occurs during fall migration (Dau 2011, WACH Working Group 2011). Dau (2013) determined the WACH rut dates to be October 22-26. This is based on back-calculations from calving dates using a 230 day gestation period.

The Western Arctic Caribou Herd Working Group (Working Group) developed a Western Arctic Caribou Herd Cooperative Management Plan (WACH Management Plan) in 2003, and revised it in 2011 (WACH Working Group 2011). The WACH Management Plan identifies seven plan elements: cooperation, population management, habitat, regulations, reindeer, knowledge, and education as well as associated goals, strategies, and management actions. As part of the population management element, the Working Group developed a guide to herd management determined by population size, population trend, and harvest rate (**Table 1**).

The State of Alaska manages the WACH to protect the population and its habitat, provide for subsistence and other hunting opportunities on a sustained yield basis, and provide for viewing and other uses of caribou (Dau 2011). State management objectives for the WACH are the same as the goals specified in the WACH Management Plan (WACH Working Group 2011, Dau 2011) and include:

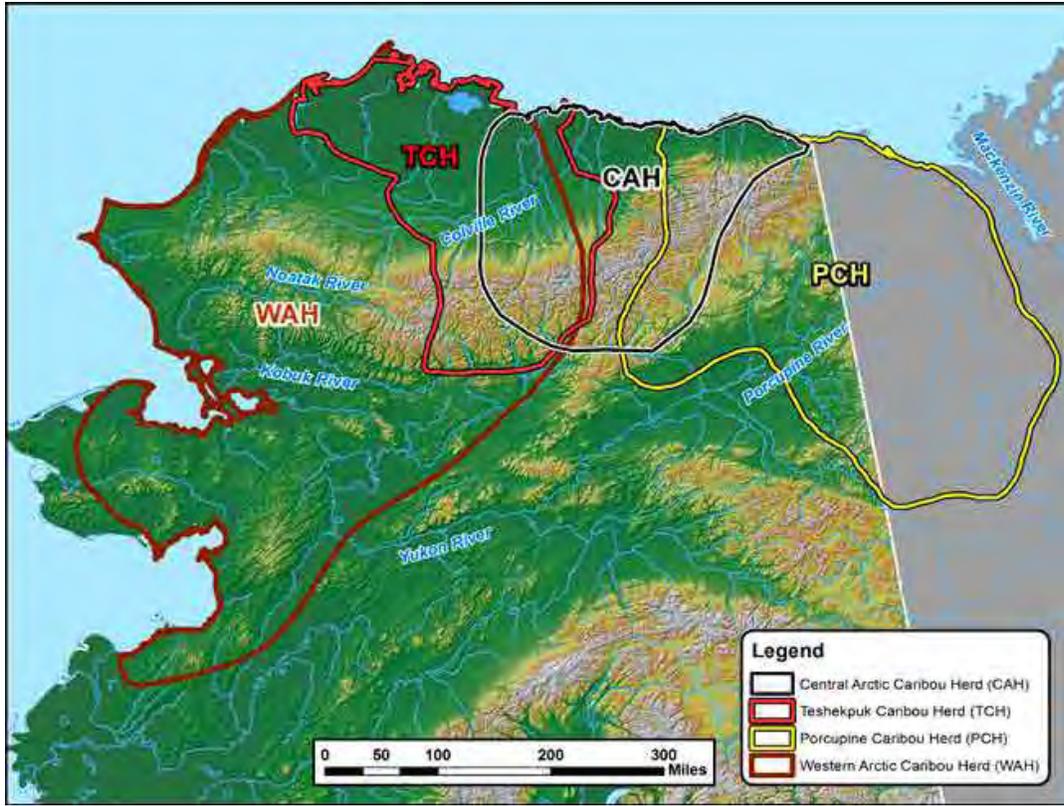


Figure 1. Herd overlap and ranges of the WACH, TCH, CACH and Porcupine caribou herds (WACH 2014).

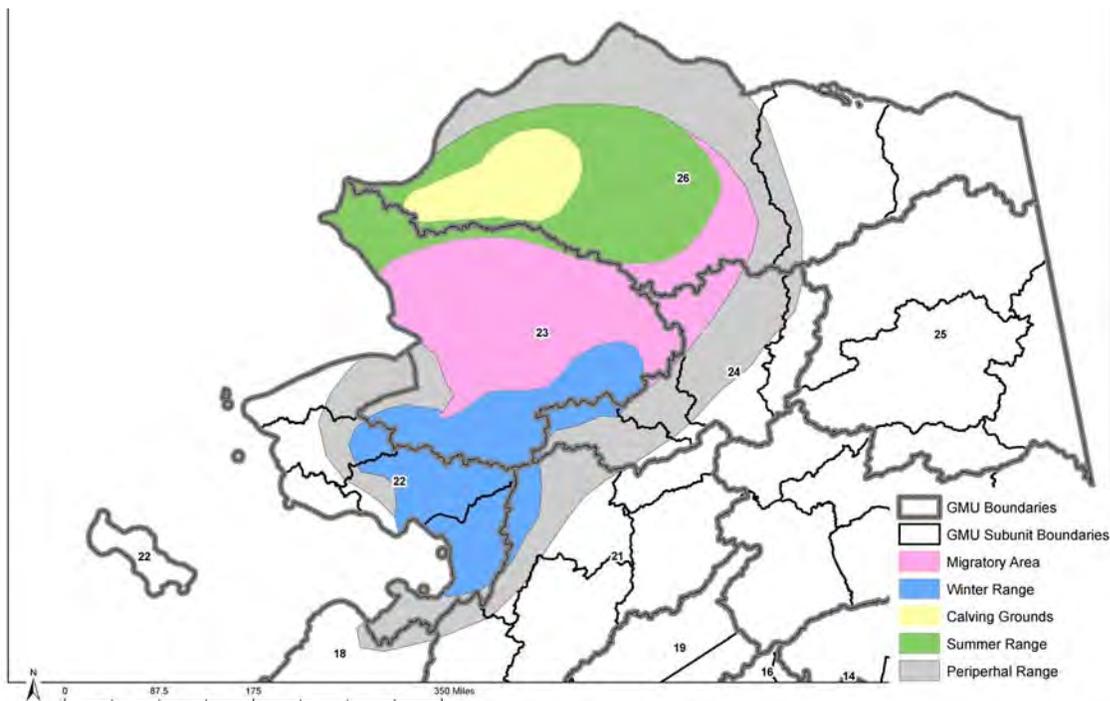


Figure 2. Range of the Western Arctic Caribou Herd.

- Encourage cooperative management of the WACH and among State, Federal, local entities, and all users of the herd.
- Manage for healthy populations using management strategies adapted to fluctuating population levels and trends.
- Assess and protect important habitats.
- Promote consistent and effective State and Federal regulations for the conservation of the WACH.
- Seek to minimize conflict between reindeer herders and the WACH.
- Integrate scientific information, traditional ecological knowledge of Alaska Native users, and knowledge of all users into management of the herd.
- Increase understanding and appreciation of the WACH through the use of scientific information, traditional ecological knowledge of the Alaska Native users, and knowledge of all other users.

The WACH population declined rapidly in the early 1970s and bottomed out at about 75,000 animals in 1976. Aerial photo censuses have been used since 1986 to estimate population size. The WACH population increased throughout the 1980s, and 1990s, peaking at 490,000 animals in 2003 (**Figure 3**). Since 2003, the WACH has declined at an average annual rate of 7.1% from approximately 490,000 in 2003 to 234,757 caribou in 2013 (Dau 2011, Caribou Trails 2014, Dau 2014) (**Figure 3**).

Between 1982 and 2011, the WACH population was within the liberal management level prescribed by the WACH Working Group (**Table 1**). In 2013, the WACH population estimate fell below the population threshold for liberal management of a decreasing population (265,000), slipping into the conservative management level (**Table 1, Figure 3**).

In July 2015, ADF&G attempted an aerial photo census of the herd. However, the photos taken could not be used due to poor light conditions that obscured unknown portions of the herd. Another photo census is planned for July 2016 (Dau 2015). However, based on cow mortality, calf survival, and population models, the WACH population is likely still declining and may be around 200,000 animals, which is on the line between conservative and preservative management levels (Parrett 2015a, 2015b; Dau 2015) (**Table 1**). The rate of decline, however, seems to be decreasing (Parrett 2015a).

Between 1970 and 2014, the bull:cow ratio has exceeded critical management levels (see **Table 1**) in all years, except 1975, 2001, and 2014 (**Figure 4**). Reduced sampling intensity in 2001 likely biased the 2001 bull:cow ratio low (Dau 2013). However, the low bull:cow ratio observed in 2014 is expected to continue declining (Parrett 2015b). The average annual number of bulls:100 cows was greater during the period of population growth (54:100 between 1976-2001) than during the recent period of decline (45:100 between 2004-2014). Additionally, Dau (2013) states all bull:cow ratios should be interpreted with caution due to sexual segregation during sampling and their inability to sample the entire population.

Between 1970 and 2012, the fall calf:cow ratio ranged from 35-59 calves:100 cows/year, averaging 46 calves:100 cows/year (**Table 2, Figure 5**). During periods of rapid population growth (1976–1992), fall calf:cow ratios were generally higher (averaging 54 calves:100 cows/year) than during periods of slow population growth or decline (1993–2013, averaging 43 calves:100 cows/year) (**Table 2, Figure 5**).

Although factors contributing to the decline are not known with certainty, increased adult cow mortality, and decreased calf recruitment and survival played a role (Dau 2011). Since the mid-1980s, adult mortality has slowly increased while recruitment has slowly decreased (Dau 2013, **Figures 5, 6**).

Calf production has likely had little influence on the population trajectory (Dau 2013). Between 1990 and 2003, the June calf:cow ratio averaged 66 calves:100 cows/year. Between 2004 and 2012, the June calf:cow ratio averaged 69 calves:100 cows/year (**Figure 5**). However, decreased calf survival and recruitment are likely contributing to the current population decline (Dau 2013). Short yearlings (SY) are 10-11 months old caribou. SY:adult ratios indicate overwintering calf survival and recruitment. Between 1990 and 2003, SY:adult ratios averaged 20 SY:100 adults/year. Since the decline began in 2003, SY:adult ratios have averaged 16 SY:100 adults/year (2004-2012, **Figure 5**).

Similarly, fall calf:cow ratios indicate calf survival over summer. Fall calf:cow ratios declined from an average of 46 calves:100 cows/year between 1990-2003 to an average of 39 calves:100 cows/year between 2004-2012 (**Figure 5**).

Table 1. Western Arctic caribou herd management levels using herd size, population trend, and harvest rate (WACH Working Group 2011).

Management Level and Harvest Level	Population Trend		
	Declining Low: 6%	Stable Med: 7%	Increasing High: 8%
Liberal	Pop: 265,000+ Harvest: 18,550-24,850	Pop: 230,000+ Harvest: 16,100-21,700	Pop: 200,000+ Harvest: 16,000-21,600
Conservative	Pop: 200,000-265,000 Harvest: 12,000-18,550	Pop: 170,000-230,000 Harvest: 11,900-16,100	Pop: 150,000-200,000 Harvest: 12,000-16,000
Preservative	Pop: 130,000-200,000 Harvest: 8,000-12,000	Pop: 115,000-170,000 Harvest: 8,000-12,000	Pop: 100,000-150,000 Harvest: 8,000-12,000
Critical Keep Bull:Cow ratio ≥ 40 Bulls:100 Cows	Pop: < 130,000 Harvest: 6,000-8,000	Pop: < 115,000 Harvest: 6,000-8,000	Pop: < 100,000 Harvest: 6,000-8,000

The annual mortality rate of radio-collared adult cows increased, from an average of 15% between 1987 and 2003, to 25% from 2004–2012 (Dau 2011, 2013, 2014, **Figure 6**). Estimated mortality includes all causes of death including hunting (Dau 2011). Dau (2013) states these mortality rates are biased high due to selection of older caribou to radio-collar. Dau (2013) attributed the high mortality rate for 2011-2012 (33%, **Figure 6**) to a winter with deep snows, which weakened caribou and enabled wolves to prey on them more easily. Prior to 2004, estimated adult cow mortality only exceeded 20% twice, but has exceeded 20% in 7 of the last 9 regulatory years between 2004 and 2012 (**Figure 6**).

Far more caribou died from natural causes than from hunting between 1992 and 2012. Cow mortality remained constant throughout the year. However, natural and harvest mortality for bulls spiked during the fall. Predation, particularly by wolves, accounted for the majority of the natural mortality (Dau 2013). However, as the WACH has declined, the percentage of mortality due to hunting has increased relative to natural mortality. For example, during the period October 1, 2013 to September 30, 2014, estimated hunting mortality was approximately 42% and estimated natural mortality about 56% (Dau 2014). In previous years (1983-2013), the estimated hunting mortality exceeded 30% only once in 1997-1998 (Dau 2013).

Other factors that may be contributing to the current population decline include weather (particularly fall and winter icing events), predation, hunting pressure, deteriorating range condition (including habitat loss and fragmentation), climate change, and disease (Dau 2014). Joly et al. (2007) documented a decline in lichen cover in portions of the wintering areas of the WACH. Dau (2011, 2014) reported that degradation in range condition is not thought to be a primary factor in the decline of the WACH because animals have generally maintained good body condition since the decline began. However, the body condition of the WACH in the spring may be a better indicator of the effects of range condition versus the fall when the body condition of the WACH is routinely assessed and when caribou are in prime condition (Joly 2015, pers. comm.).

Habitat

Caribou feed on a wide variety of plants including lichens, fungi, sedges, grasses, forbs, and twigs of woody plants. Arctic caribou depend primarily on lichens during the fall and winter, but during summer they feed on leaves, grasses and sedges (Miller 2003).

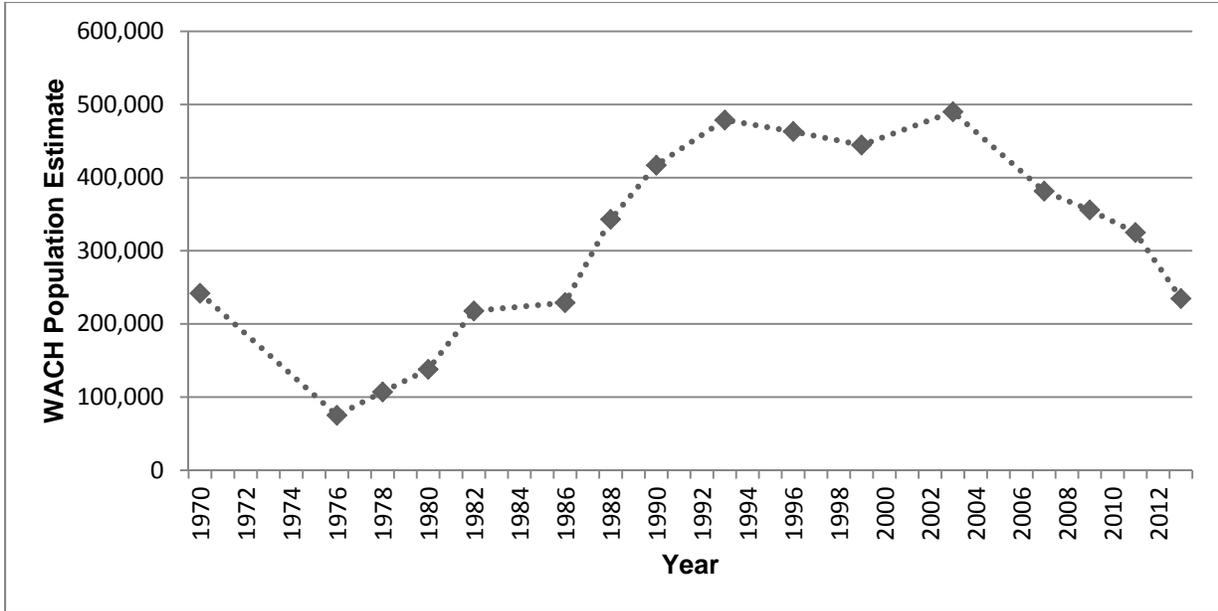


Figure 3. Western Arctic caribou herd population estimates from 1970-2013. Population estimates from 1986-2013 are based on aerial photographs of groups of caribou that contained radio-collared animals (Dau 2011, 2013, 2014).

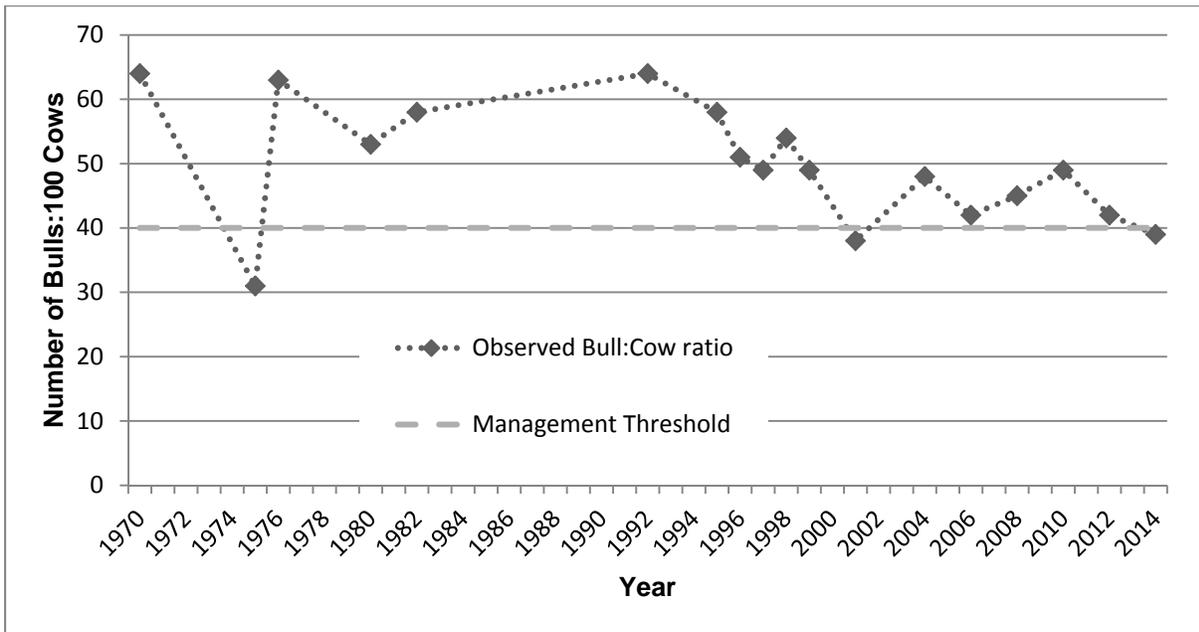


Figure 4. Bull:Cow ratios for the Western Arctic Caribou Herd (Dau 2013).

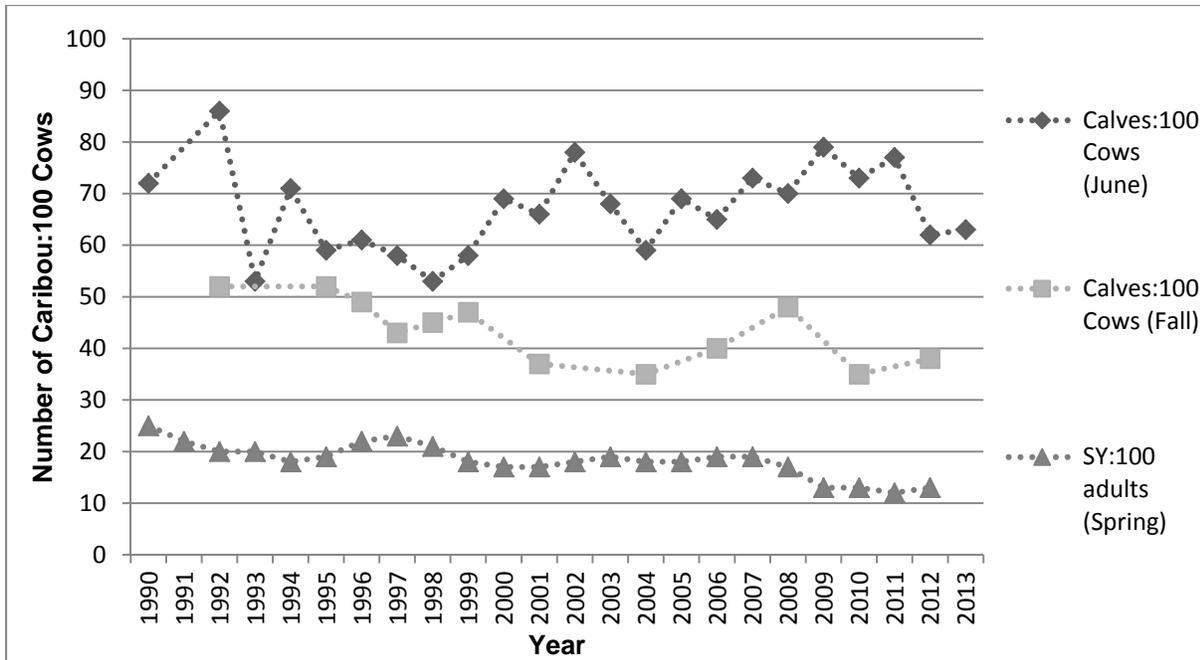


Figure 5. Calf:cow and short yearling (SY):adult ratios for the Western Arctic Caribou Herd (Dau 2013). Short yearlings are 10-11 months old caribou.

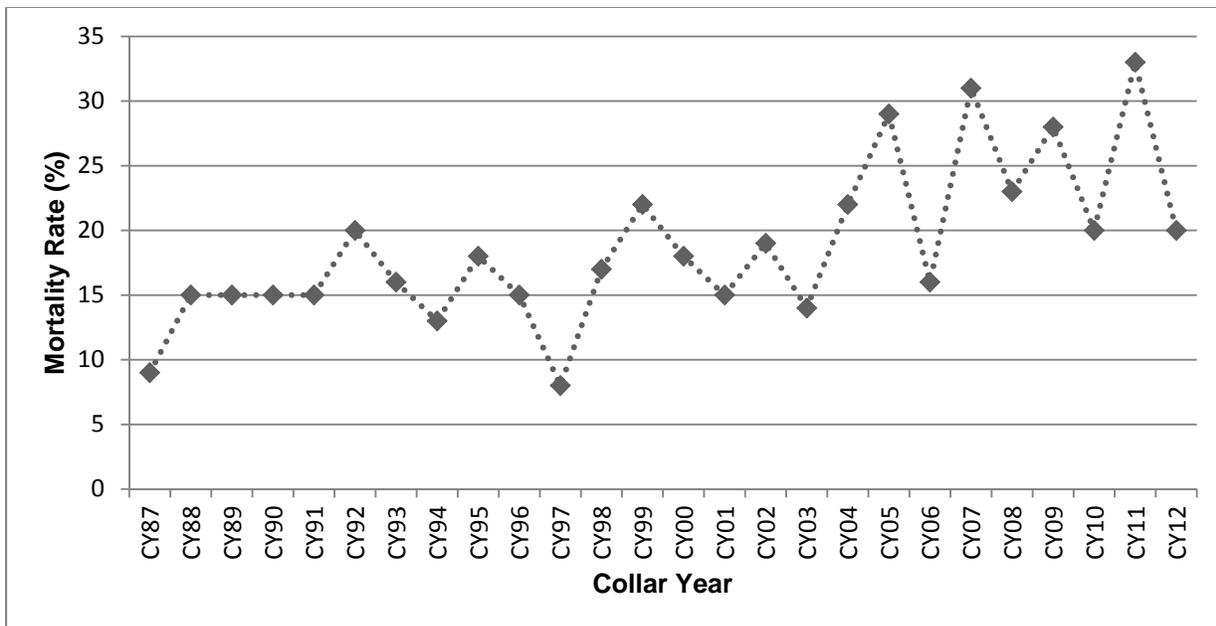


Figure 6. Mortality rate of radio-collared caribou in the Western Arctic caribou herd (Dau 2013). Collar Year = 1 Oct-30 Sept.

Table 2. Western Arctic Caribou Herd fall composition 1976 – 2014 (Dau 2011, 2013, 2014).

Regulatory Year	Total bulls: 100 cows ^a	Calves: 100 cows	Calves: 100 adults	Bulls	Cows	Calves	Total
1976/1977	63	52	32	273	431	222	926
1980/1981	53	53	34	715	1,354	711	2,780
1982/1983	58	59	37	1,896	3,285	1,923	7,104
1992/1993	64	52	32	1,600	2,498	1,299	5,397
1995/1996	58	52	33	1,176	2,029	1,057	4,262
1996/1997	51	49	33	2,621	5,119	2,525	10,265
1997/1998	49	43	29	2,588	5,229	2,255	10,072
1998/1999	54	45	29	2,298	4,231	1,909	8,438
1999/2000	49	47	31	2,059	4,191	1,960	8,210
2001/2002	38	37	27	1,117	2,943	1,095	5,155
2004/2005	48	35	24	2,916	6,087	2,154	11,157
2006/2007	42	40	28	1,900	4,501	1,811	8,212
2008/2009	45	48	33	2,981	6,618	3,156	12,755
2010/2011	49	35	23	2,419	4,973	1,735	9,127
2012/2013	42	38	27	2,119	5,082	1,919	9,120
2014/2015	39 ^b	^c	^c	^c	^c	^c	^c

^a 40 bulls:100 cows is the minimum level recommended in the WACH Cooperative Management Plan (WACH Working Group 2011)
^b Estimated from power point presentation presented at the WACH Working Group Meeting December 17-18, 2014 (Dau 2014)
^c Data not available

Harvest History

Caribou harvest by local residents is estimated from community harvest surveys, if available, and from models developed by Sutherland (2005), which incorporate factors such as community size and proximity to the herd (Georgette 1994, Sutherland 2005, Braem et al. 2011, Parret 2013). Caribou harvest by nonlocal residents and nonresidents are based on harvest ticket reports (Parret 2013).

From 1999–2013, the average annual estimated harvest from the WACH was 13,450 caribou, ranging from 9,500-15,800 caribou/year (Dau 2009, Dau 2014, Dau 2016, pers. comm., **Figure 7**). These harvest levels are within or below the conservative harvest level specified in the WACH Management Plan (**Table 1**).

Local residents take approximately 94% of the caribou harvest within the range of the WACH, with residents of Unit 23 accounting for the vast majority of the harvest. From 1999-2011, 66-88% of all WACH caribou were harvested from Unit 23 by residents and non-residents of Alaska (Dau 2013, **Figure 7**). Of the total Unit 23 caribou harvest, residents within the range of the WACH account for 95% of the harvest on average, while all other hunters only account for 5% of the Unit 23 caribou harvest on average (**Figure 8**). These estimates are for all of Unit 23; harvest by nonlocal resident and nonresident hunters on

Federal public lands in Unit 23 is even less. For a more detailed listing of caribou harvest by community and year, see **Appendix 1**.

The State of Alaska manages the WACH on a sustained yield basis. The harvestable surplus of caribou is calculated as 2% of the cows and 15% of the bulls (Parrett 2015b). In recent years, as the WACH population has declined, the State-determined total harvestable surplus for the WACH has also declined (Dau 2011, Parrett 2015a). In 2015/16, the combined TCH/WACH harvestable surplus declined from an estimated 13,250 caribou in 2014/15 to an estimated 12,400 caribou. While there is substantial uncertainty in the harvestable surplus estimates, the overall trend is decreasing (Parrett 2015a). If population projections and harvest estimates are accurate, overharvesting is already occurring (Parrett 2015b).

Harvest from the WACH, which has remained fairly consistent since 1990, now represents a larger proportion of the annual mortality. This is one of the factors that prompted the Alaska Board of Game to enact restrictions on WACH harvest in March 2015.

The WACH Management Plan recommends harvest strategies at different management and harvest levels (**Table 1**). The harvest recommendations under conservative management include: no harvest of calves, no cow and restricted bull harvest by nonresidents, voluntary reduction of cow harvest by residents, and limiting harvest to maintain a minimum 40:100 bull:cow ratio (WACH Working Group 2011).

The recently adopted (March 2015) State regulations for caribou in Unit 23 addressed the management plan's recommendations for conservative management by prohibiting the take of calves, restricting bull and cow seasons for residents and nonresidents of Alaska, and reducing the nonresident bag limit from two caribou to one bull. The proposed Federal regulations similarly address the recommendations of the WACH working group.

Two of the harvest recommendations under both Preservative and Critical management levels are: "1) Limit the subsistence harvest of bulls to maintain at least 40 bulls:100 cows and 2) Harvest restricted to residents only, according to state and federal law. Closure of some federal lands to nonqualified users may be necessary" (WACH Working Group 2011, pp. 46-47).

The number of transported hunters within Selawik National Wildlife Refuge (NWR) has decreased since 2000 (**Figure 9**, FWS 2016). Between 1993 and 2014, caribou comprised 62% of the big game harvested by transported hunters on Selawik NWR on average (moose, bear, and wolves comprised the rest). However, since 2000, the number of caribou harvested by this user group has decreased substantially (**Figure 10**, FWS 2016). Additionally, Selawik NWR has designated certain refuge lands near villages and high subsistence use areas as closed to commercial use by transporters and guides (FWS 2014).

Conversely, the number of transported hunters in the Noatak National Preserve (NNP) increased from about 300 in 2010 to over 400 in 2014 (Ackerman and Fix 2015). In 2015, approximately 350 hunters (300 non-local and 50 local) were transported into NNP (NPS 2016). In a survey of 372 sport hunters in the NNP from 2010-2013, 62% of groups harvested caribou with the average harvest being 1.8 caribou per group member (Ackerman and Fix 2015).

During the 2014 hunting season, average aircraft noise events within NNP ranged from 3.7 events per day at Kugururok River to 7.8 events per day at Sapun Creek. It is unknown whether the difference in aircraft noise events is due to management areas (i.e. the NPS delayed entry zone and ADF&G controlled use area) or the recent easterly trend of primary caribou migration routes (Betchkal 2015). However, the recent transporter aircraft noise levels appear comparable to aircraft noise levels documented in NNP in 1987 (Georgette and Loon 1988) and 1995-1996 (NPS) (Ackerman and Fix 2015). However, comparisons should be interpreted with caution due to different methodologies (i.e. human observations v. continuous acoustic recordings and the establishment of the ‘delayed entry zone’ in 2012 (Ackerman and Fix 2015).

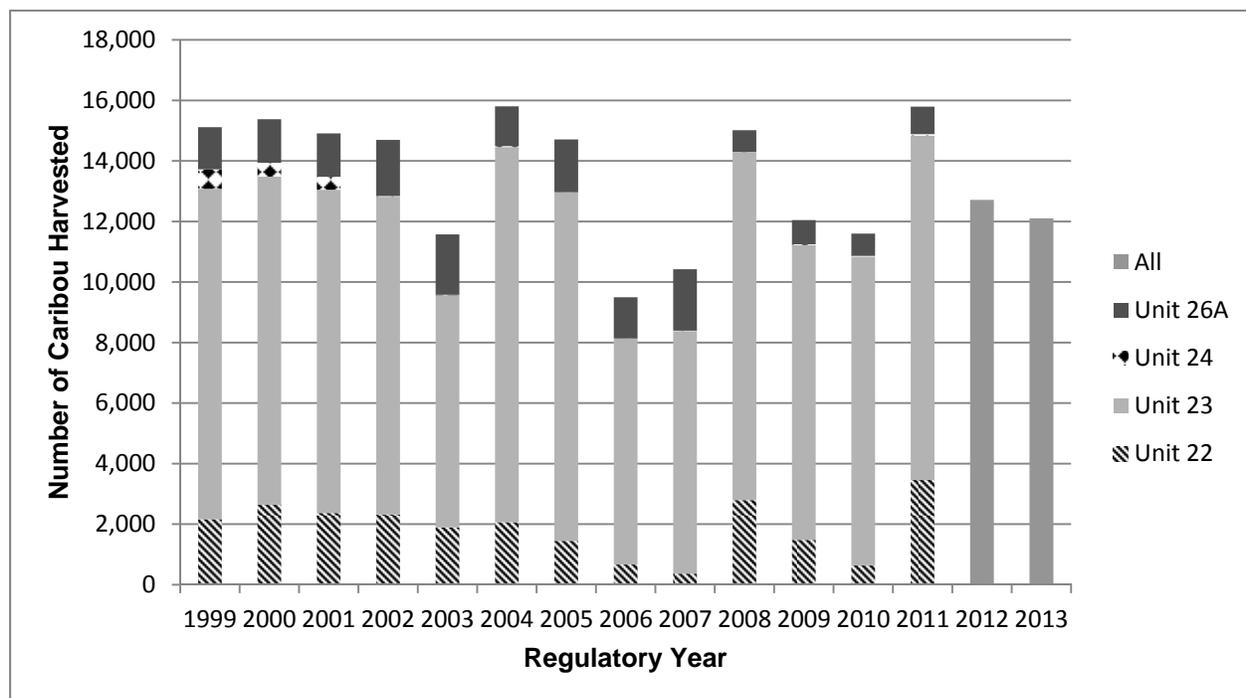


Figure 7. Total (resident and nonresident) estimated annual harvest of Western Arctic caribou by unit (Dau 2009, 2013, and 2016, pers. comm.). Unit 21D not included (average harvest is 0-10 caribou/year). Harvest by unit not available for regulatory years 2012/13 and 2013/14.

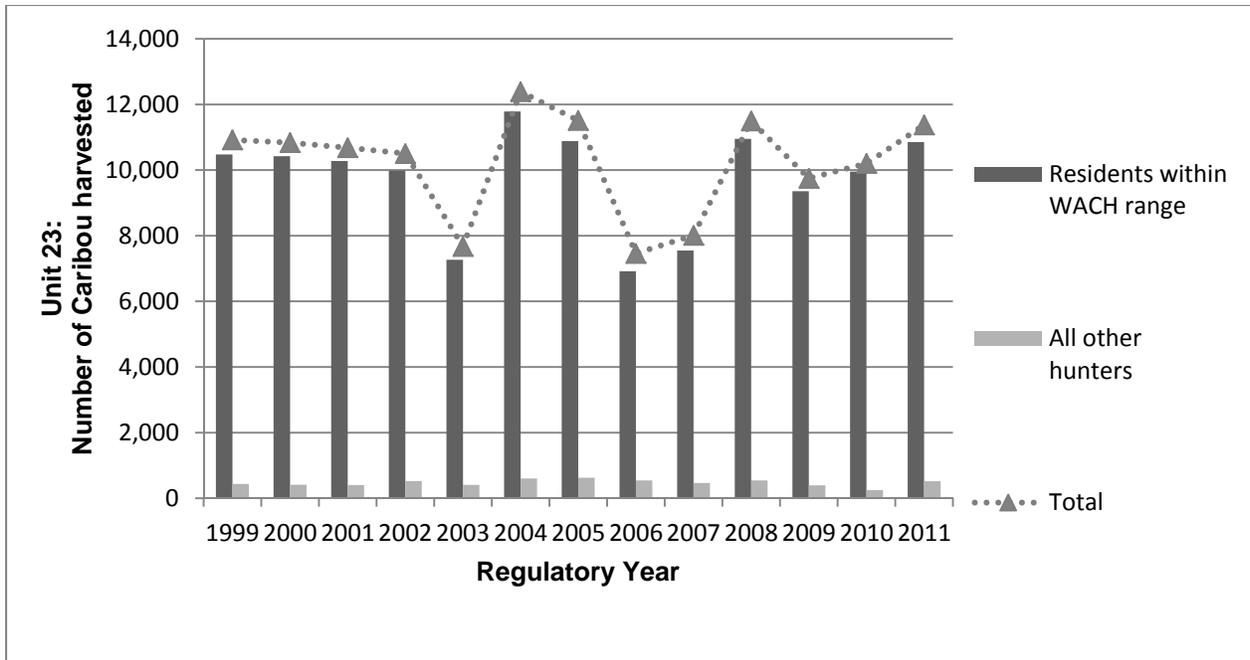


Figure 8. Estimated number of caribou harvested in Unit 23 by residency (Dau 2011, 2013).

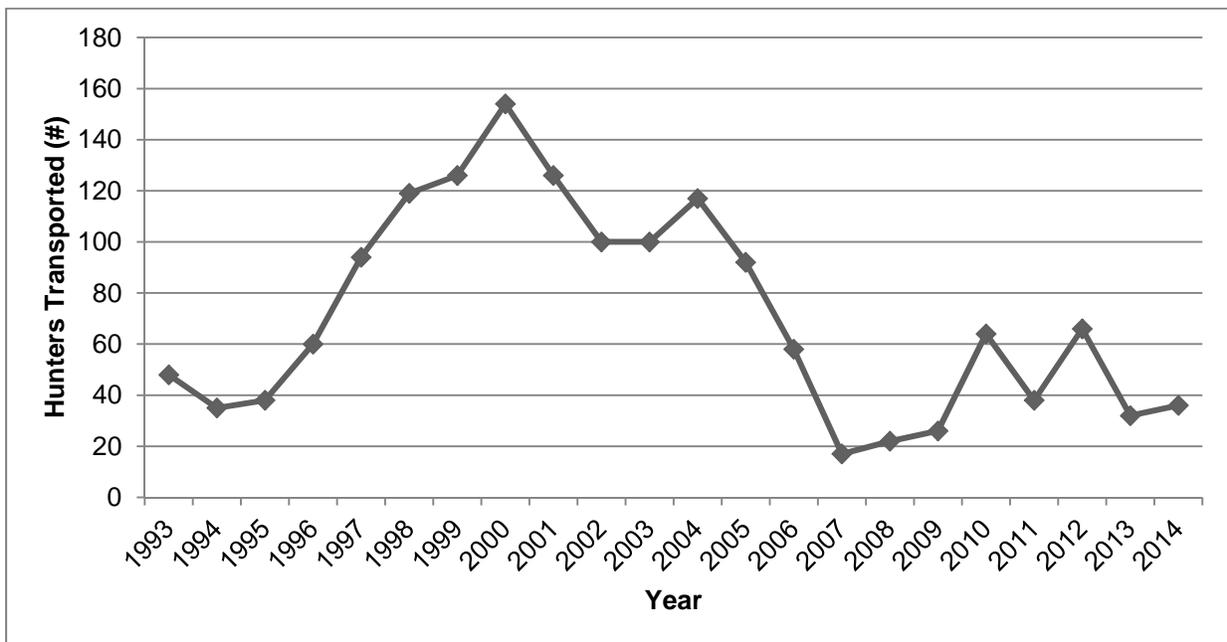


Figure 9. Number of hunters transported by aircraft transporters on Selawik National Wildlife Refuge (FWS 2016)

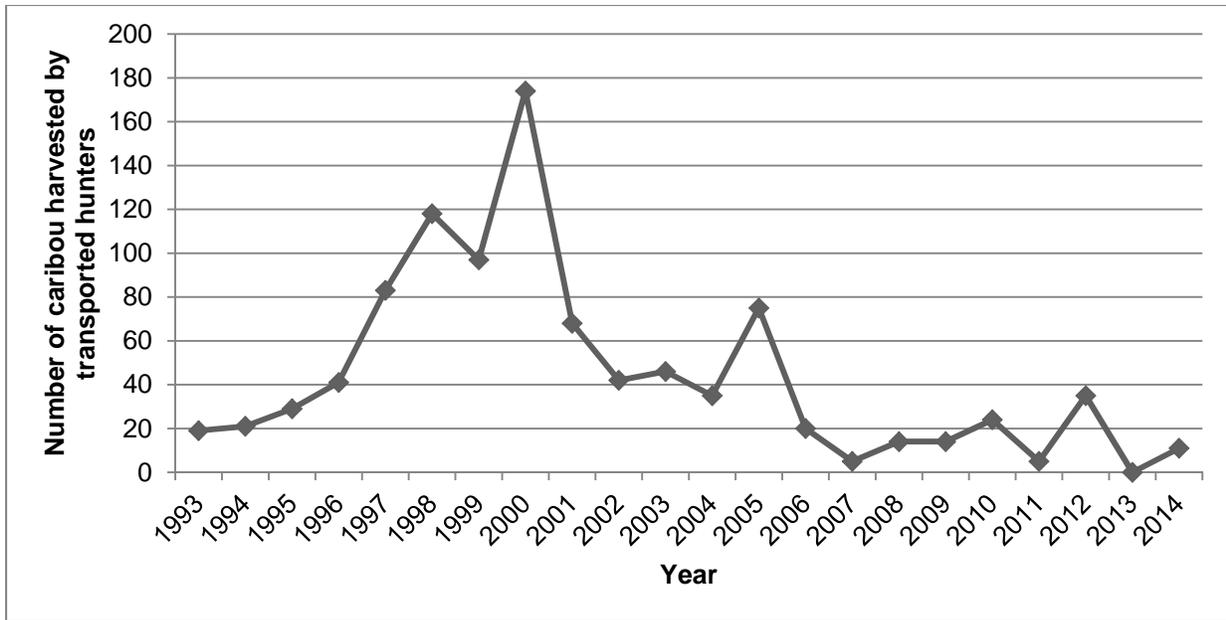


Figure 10. Number of caribou harvested by hunters transported by aircraft transporters on the Selawik National Wildlife Refuge (FWS 2016).

Cultural Knowledge and Traditional Practices

Currently, caribou hunting is most intensive from September through November. They can be easily harvested in large numbers, when available, and can be transported back to villages by boat before freeze-up. Hunters search for caribou and attempt to intercept them at known river crossings. Ideally, caribou harvesting occurs when the weather is cool enough to prevent spoilage of meat. If not, meat is frozen for later use. Prior to freeze-up, bulls are preferred because they are fatter than cows (Braem et al. 2015; Georgette and Loon 1993).

Small groups of caribou that have over-wintered may be taken by hunters in areas that are accessible by snowmachine. “Hunters harvest cows during the winter because they are fatter than bulls . . . Caribou harvested during the winter can be aged completely without removing the skin or viscera . . . Then in the spring, the caribou is thawed. Community members cut it into strips to make dried meat, or they package and freeze it” (Braem et al. 2015:141). In spring, caribou start their northward migration to calving grounds. The caribou that are harvested are “lean and good for making dried meat (*paniqtuq*) during the warm, sunny days of late spring” (Georgette and Loon 1993:80).

In contrast to current caribou hunting practice, late July to early September was historically the preferred time to harvest caribou because of the quality of their hides used in the making of sleeping mats and other items. The hides of calves were used in the making of clothing, especially winter clothing that was replaced constantly. Calf hides were preferred because “they are light weight, very warm, and can be cut, pieced together, and sewn into attractive patterns” (Burch 2012:38). Caribou hides were essential for these

purposes as there were few other animals available to fill the need. People in Northwest Alaska continue to use caribou hides in the making of winter parkas and footwear (Loon 2007).

Historically, during fall and spring caribou migrations, people built “drive fences” out of cairns, bundles of shrubs, or upright logs. These fences were sometimes several miles long and two to three miles wide. Ideally, the closed end of the fence crossed a river, and caribou were harvested while crossing the river and retrieved later; or the fence would end in a corral where caribou were snared and killed with spears (Burch 2012). “The landscape of Northwest Alaska, especially in hills and mountains, is littered with the remains of drive fences that were in every stage of construction when they were abandoned” (Burch 2012:40).

Beginning in the late 1800s, the WACH population declined rapidly. At its nadir, its range had shrunk to less than half its former size. Famine ensued, primarily due to the absence of caribou. In the early 1900s, reindeer were introduced to fill the need for food and hides. The WACH began to rebound in the 1940s. Currently, among terrestrial animals, caribou are normally the most abundant; however, the population in any specific area is subject to wide fluctuations from year to year as caribou migration routes change (Burch 2012).

Today, the human population in Unit 23 is comprised primarily of 11 regional Inupiaq groups (Burch 1998). Kotzebue is the regional hub of transportation and commerce and is the home to the majority of non-Natives in the region. The population of Unit 23 was approximately 7,500 in 2010, according to the US Census (ADOLWD 2016). Caribou dominates the subsistence harvest. In household harvest surveys conducted between 1964 and 2012, caribou was often the most harvested species, more than any other wildlife resource, in pounds of edible weight. Based on these surveys, in a typical study year, the harvest of caribou was between 100 and 200 pounds per person in Northwest Alaska communities (ADF&G 2016, Appendix 1).

In recent years, local people have been having trouble getting caribou, which is hurting villages (NWA RAC 2015). In a survey of Noatak hunters, 73% of respondents reported harvesting fewer caribou over the last five years (Halas 2015).

User Conflict

User conflicts between local and nonlocal hunters have been well documented in Unit 23, specifically in the Noatak National Preserve, the Squirrel River area, and along the upper Kobuk River (Georgette and Loon 1988, Jacobson 2009, Harrington and Fix 2009 *in* Ackerman and Fix 2015; Halas 2015; NWA RAC 2015; Braem et al. 2015). Local people, particularly from the village of Noatak, have expressed concerns over aircraft and non-local hunters disrupting caribou migration by ‘scaring’ caribou away from the river crossings, landing and camping along migration routes, and shooting lead caribou (Halas 2015, Ackerman and Fix 2015, NWA RAC 2015). In the survey of Noatak hunters, 78% and 92% of respondents perceived non-locals and planes to impact caribou migration, respectively. Similarly, 63% and 81% of respondents reported that non-local hunters and planes reduced hunting success, respectively (Halas 2015). Negative encounters between local and non-local hunters identified by respondents primarily centered around river crossings of migrating caribou (**Figure 11**, Halas 2015).

Respondents further stated that many non-local hunters did not act in accordance with local hunting traditions such as shooting caribou for trophies/sport instead of food and wasting meat by letting it spoil in the field (Halas 2015). These concerns are echoed by residents of Ambler, Shungnak, and Kobuk as well as members of the Northwest Arctic Council (Braem et al. 2015, NWA RAC 2015). Additional conflicts between user groups include competition for/overcrowding of campsites, litter, human waste, lack of law enforcement, degradation of the landscape from four-wheelers, and displacement from traditional hunting sites (Ackerman and Fix 2015, NWA RAC 2015, Braem et al. 2015).

These concerns were somewhat validated by a survey of 372 sport hunters on the Noatak National Preserve. Eighteen percent of groups reported shooting at the first caribou they saw and less than half of the sport hunter respondents reported receiving information regarding ‘traditional local subsistence use’, ‘subsistence areas to avoid’, and ‘local traditional hunting.’ Nonresident sport hunters also reported that hunting for trophies was more important than hunting for meat while resident sport hunters reported hunting for meat was more important than hunting for trophies. Additionally, 58% of sport hunters reported they were not sure if they salvaged all edible meat. Similar to local hunters, sport hunters reported encounters with non-local hunters and airplanes as the two biggest factors detracting from their trip (Ackerman and Fix 2015).

Attempts to mitigate user conflict in Unit 23 include: the formation of the GMU 23 Working Group in 2008 (Braem et al. 2015), the delayed entry zone in NNP, the State’s CUA along the Noatak River, closure of some areas to commercial use within Selawik NWR, and the development of a Squirrel River management plan, which will address permitted guide and transporter activities such as camp size, placement, and travel (NWA RAC 2015).

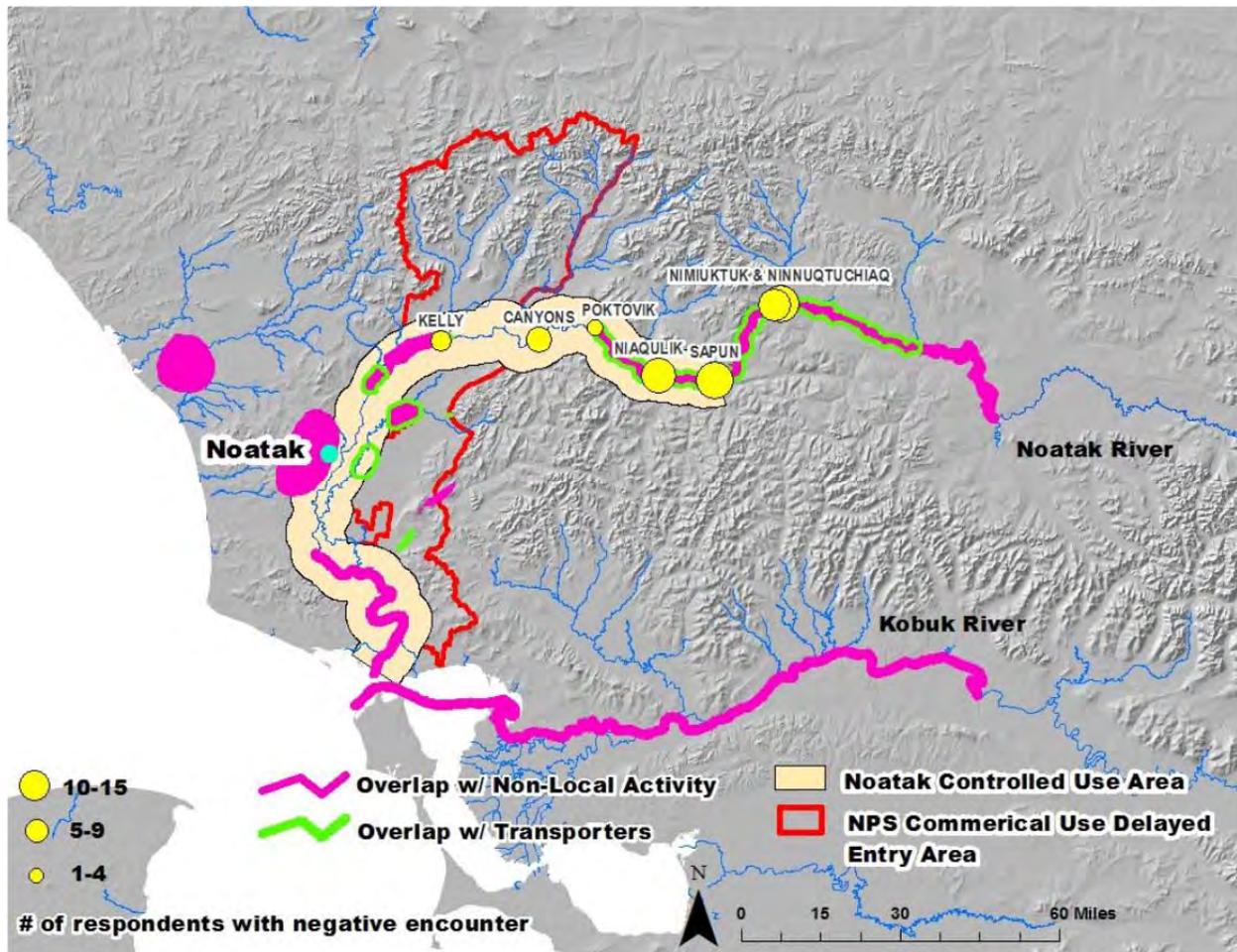


Figure 11. Areas of overlap use between Noatak interview respondents' and non-local users. Green lines and polygons delineate overlap areas with observed transporters. Notes: Pink lines and polygons are non-local users observed in the area that overlapped with local hunters. Yellow circles represent the number of respondents who had a negative encounter with non-locals in specified locations. Respondents could identify more than one location, n=19 (Halas 2015)

Effects of the Proposal

If this proposal is adopted, caribou hunting on Federal public lands in Unit 23 would be limited to Federally qualified subsistence users with a customary and traditional use determination for caribou in Unit 23. According to the best available information, overharvesting may already be occurring and the WACH population continues to decline (Parrett 2015a, 2015b).

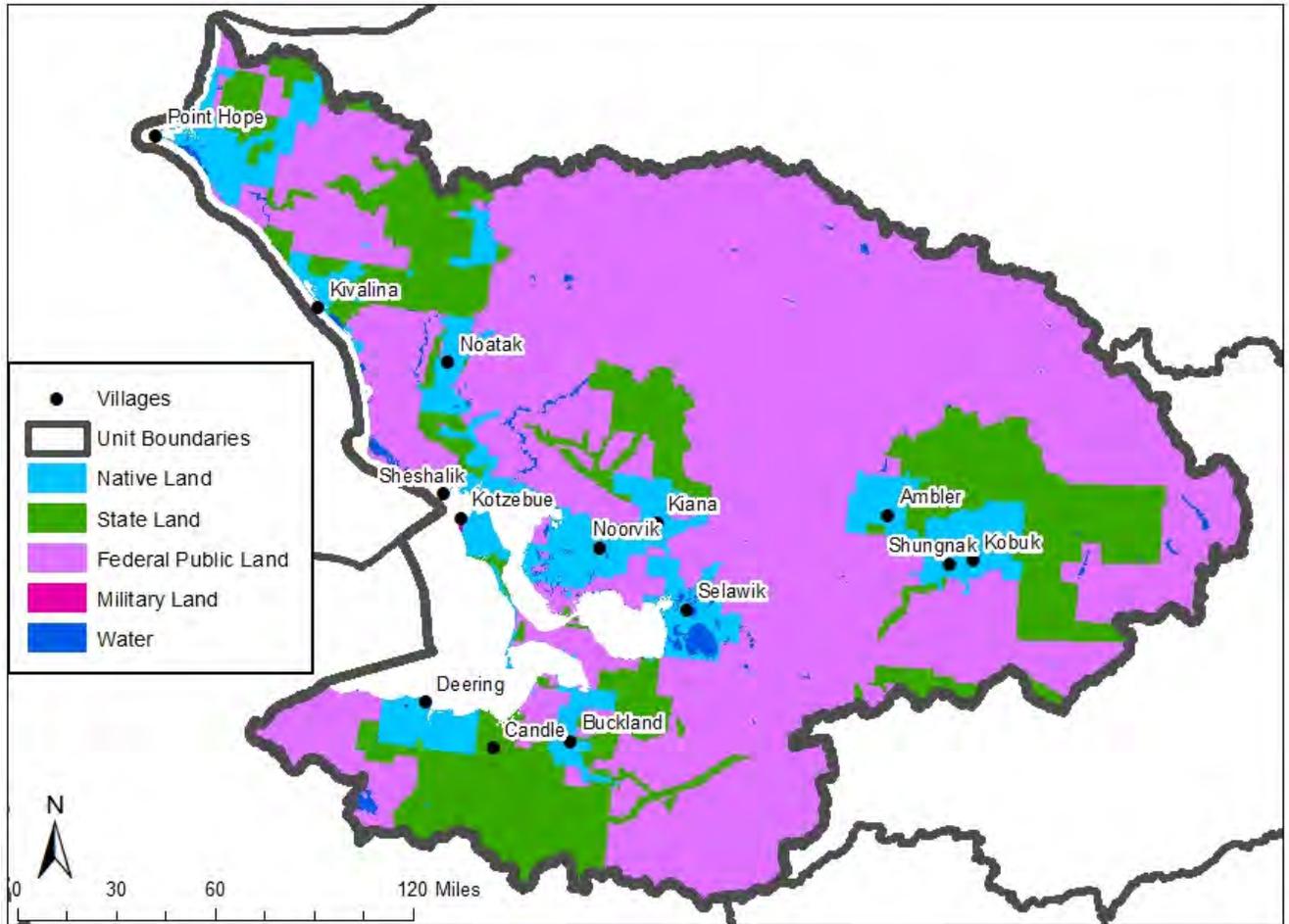
While one of the management recommendations under preservative management is possible closure of Federal public lands to non-Federally qualified subsistence users, it is uncertain whether the WACH population is currently within the conservative or preservative management level (WACH Working Group 2011). The Management Plan also recommends restricting harvest to residents only under preservative management. Currently, nonresidents may harvest caribou under State regulations. Also, while the 2014 bull:cow ratio was just below the critical management threshold, the bull:cow ratio has historically fluctuated substantially from year to year (Table 1, Figure 4, Parret 2015a).

Since non-Federally qualified subsistence users account for less than 5% of the Unit 23 caribou harvest, closing Federal public lands to these users is expected to have very little impact on the conservation or population status of the WACH. Additionally, due to the harvest and season restrictions for nonresidents under the new State regulations, the harvest impact of this user group on the WACH is expected to decrease without a closure of Federal public lands. In 2015, the State also restricted bull and cow seasons for residents and prohibited the take of calves, which will further reduce the harvest impact of resident non-Federally qualified subsistence users.

Transporter traffic and hunting by non-Federally qualified subsistence users is concentrated in August and September when caribou are generally migrating through Unit 23 (NWA RAC 2015, Ackerman and Fix 2015). While the State reduced the nonresident season by 8.5 months in 2015, nonresidents can still hunt during the peak hunting season (August – September, Ackerman and Fix 2015). However, as the average caribou harvest by sport hunters is 1.8 caribou (Ackerman and Fix 2015), the bag limit reduction under State regulations is expected to decrease harvest by this user group.

If this request is approved, non-Federally qualified subsistence users would still be able to hunt on State lands. As State lands only comprise 19% of Unit 23, hunting activity may be concentrated and congested in those areas, which may increase user conflicts (**Map 1**). Non-federally qualified subsistence users would also need to distinguish between State and Federal public lands. Due to the checkerboard pattern of land ownership in some areas of Unit 23 (i.e. Squirrel River area, **Map 1**), distinguishing land status may be difficult and potentially increase law enforcement concerns. Non-federally qualified subsistence users may also be displaced onto Federal public lands in adjacent units (i.e. Unit 26A), which could impact hunting and harvest in those units.

The proponent states, “. . .outside hunting activity as well as a decline in the caribou population is having negative effects on . . . subsistence users.” While approval of this request may decrease the number of people and planes on Federal public lands, any existing conflicts between Federally and non-Federally qualified subsistence users would not be fully eliminated by approval of this request as non-Federally qualified subsistence users could still hunt moose, bear, and other species on Federal public lands in Unit 23 (NWA RAC 2015). Other users (i.e. photographers, recreational boaters, private planes) would also still be able to fly over and access Federal public lands. Attempts to mitigate user conflicts in Unit 23 have already been implemented by the NPS (delayed entry zone in NNP), ADF&G (Noatak CUA), and Selawik NWR (closure of certain areas to commercial use).



Map 1. Land status in Unit 23.

OSM CONCLUSION

Oppose Special Action Request WSA16-01.

Justification

While the Western Arctic Caribou Herd population may have entered into the preservative management level (**Table 1**), closure of Federal public lands to non-Federally qualified subsistence users is not warranted at this time. One criteria for a closure under ANILCA Title VII §815.3 and the Board’s closure policy is conservation of healthy wildlife populations. Conservation is the reason explicitly stated by the proponent as the reason the closure is necessary. Due to the relatively low number of caribou harvested by non-Federally qualified subsistence users in Unit 23, closure of Federal public lands to these users would have no meaningful biological effect.

The other criteria for closure under ANILCA Title VII §815.3 and the Board’s closure policy is continuation of subsistence use of wildlife populations. Other factors that interfere with subsistence hunts and harvest success such as aircraft disturbances would not be fully alleviated through approval of this

request. Furthermore, non-Federally qualified subsistence users would still be able to hunt other species on Federal public lands in Unit 23 as well as access these areas for other (i.e. recreational) uses.

Additionally, recent harvest and season restrictions for nonresidents, season restrictions for residents, and the prohibition on the take of calves under State regulations already reduces the impact non-Federally qualified subsistence users have on the resource and on Federally qualified subsistence users. Allowing time to gauge the efficacy of the new State regulations in conservation of the WACH is warranted before enacting more restrictive measures such as closures. Restricting nonresident harvest under State regulations is warranted before restricting harvest by all non-Federally qualified subsistence users.

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Appendix 1

Estimated total caribou harvest by community, per capita caribou harvest by community, and data sources for Unit 23: Western Arctic caribou herd (ADF&G 2015).

Unit 23				
Community	Year/Period	Est Caribou Harv.	# caribou per capita	Source
Ambler	2003	325	1.12	Georgette et al. 2005, unpublished data
	2009	456	1.75	Braem 2012
	2012	685	2.54	Braem et al. 2015
Buckland	2003	637	1.56	Magdanz et al. 2011
	2009	561	1.30	Braem 2012
Deering	1994	142	0.96	Magdanz et al. 2002
	2007-2008	182	1.37	Braem 2011
	2011-2012	237	1.91	Braem 2011
	2013	393	2.85	ADF&G unpublished data
Kiana	1999	488	1.23	ADF&G unpublished data
	2006	306	0.77	Magdanz et al. 2011
	2009	440	1.18	Braem 2012
Kivalina	1982	346	0.48	CSIS
	1983	564	0.78	CSIS
	1992	351	0.49	CSIS
	2007	268	0.67	Magdanz et al. 2010
	2010-2011	86	0.23	Braem et al. 2014
Kobuk	2004-2005	134	1.06	ADF&G unpublished data
	2009	210	1.72	Braem 2012
	2012	119	0.84	Braem et al. 2015
Kotzebue	1986	1917	0.71	Georgette and Loon 1993
	1991	3782	1.04	CSIS
	2001	2376	0.77	Whiting 2003
	2002	1719	0.56	Whiting 2003
	2003	1915	0.61	Whiting 2003
	2012-2013	1804	0.56	CSIS
2013-2014	1629	0.51	ADF&G unpublished data	
Noatak	1994	615	1.62	Magdanz et al. 2002
	1999	683	1.61	Georgette et al 2000., unpubd data
	2002	410	0.90	Georgette et al. 2004, unpubd data
	2007	441	0.90	Magdanz et al. 2010
	2010	66	0.13	Braem et al. 2014
	2011	360	0.66	Mikow et al. 2014
Noorvik	2002	988	1.46	Georgette et al. 2004, unpubd data
	2008	767	1.19	Braem et al. 2012
	2012	851	1.36	CSIS

-continued-

Unit 23, continued

Community	Year/Period	Est Caribou Harv.	# caribou per capita	Source
Point Hope	1994-1995	355	0.49	Bacon et al. 2009, rev. 2011
	2000-2001	219	0.31	Bacon et al. 2009, rev. 2011
Selawik	1999	1289	1.68	CSIS
	2006	934	1.11	CSIS
	2011	683	0.79	Braem et al. 2013
Shungnak	1998	561	2.17	Georgette 1999, unpubd data
	2002	403	1.62	Magdanz et al. 2004
	2008	416	1.53	Braem 2012
	2012	396	1.47	Braem et al. 2015

INTERAGENCY STAFF COMMITTEE COMMENTS

WSA16-01

The recommendations of the affected Regional Advisory Councils (Councils) were not in agreement for special action request WSA16-01. In a joint session during the March 2016 meeting of all the Regional Councils, the Northwest Arctic and North Slope Councils supported WSA16-01, stating the request is necessary to prevent a population crash of the Western Arctic Caribou Herd and to help local people meet their subsistence needs. Both Councils at the joint session noted that villages have been affected by low caribou harvests due to the declining caribou population, aircraft disturbance, and conflicts with non-local users. The Seward Peninsula Council opposed WSA16-01 due to a lack of conservation concern and the Western Interior Council took no action, deferring to the Unit 23 “home” Councils.

The Interagency Staff Committee is concerned that there may not be substantial evidence in the record to support that a closure to non-Federally qualified users is necessary for the conservation of healthy populations of caribou or to continue subsistence uses of the caribou population.



MANIILAQ
ASSOCIATION

February 24, 2016

US Fish & Wildlife
Office of Subsistence Management
Anchorage, AK 99503

Subj: Support for NWARAC Recommendation WSA 16-01

Dear Sir/Madam,

On behalf of Maniilaq Association, a non-profit tribal organization which provides health, social, and tribal services to the communities within the Northwest Arctic Borough, I am formally supporting the recommendation made by the Northwest Arctic Subsistence Regional Advisory Committee (NWARAC), referred to as WSA 16-01.

The recent decline in the Western Arctic caribou herd population has forced local tribal members to either harvest less caribou or travel further out of traditional hunting areas to harvest what caribou are taken. These actions have strained the limited household resources of many tribal members, forcing them to decide whether they pay for fuel and other hunting related items to hunt, or to go without hunting caribou, forcing them to rely on non-traditional foods to feed their families throughout the winter.

Our various social and health programs have seen an increase in requests for various services from residents of all communities regarding food and or heating fuel shortages, higher than average visits to the clinics related to consuming non-traditional foods. These are unforeseen consequences related to their inability to properly subsist on their primary food source, the caribou.

We strongly recommend that you adopt the WSA 16-01, as proposed.

Sincerely,

Tim Schuerch
President/CEO

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February 26, 2016

Office of Subsistence Management
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RE: WSA16-01 NWARAC Special Action Request

The Native Village of Kotzebue has had the opportunity to review the Special Action Request submitted to the Federal Subsistence Board for their consideration by the Northwest Arctic Subsistence Regional Advisory Council to close Federal lands in Unit 23 to non-Federally qualified users to the hunting of caribou, to take effect July 1, 2016 through the end of the regulatory year. In addition to reviewing the proposal we have also had the opportunity to participate in a public meeting held on the topic in Kotzebue on February 23, 2016 and to participate in a tribal consultation teleconference on February 25, 2016.

The western Arctic caribou herd is the major source of food harvested from the land by the members of the Tribe, in addition to supporting their cultural and spiritual identity as Iñupiaq people of northwest Alaska since before recorded time. It is impossible to overestimate the economic and cultural contribution that this herd provides for our members. Suffice it to say that they add tremendously to the quality of life for them. The continued presence and access to the herd for our members, is a top priority of the Native Village of Kotzebue.

We are aware of the general population decline in the western Arctic caribou herd that has been ongoing since its peak approximately ten years ago. We are also aware that for many years the disturbance of the caribou migration at the beginning of their southward migration from the northern Brooks Range and through the major corridors southward through the Brooks Range by transporters and their clients has been a cause of concern for the Tribe and the surrounding villages. It is the traditional knowledge of our members that it is very important to allow the herd to begin migrating through an area before you begin to hunt and disturb them, so that the flow of animals can continue uninterrupted. It is our belief that many times this does not occur due to fly in hunters intercepting the herds at the beginning of their movement in the northern Brooks Range causing the entire rest of the migration to be thrown in disarray, in many cases resulting in failures of the fall hunting opportunities for our members farther south in the migration corridors. The majority of this early disruption occurs on federal lands, specifically the Noatak National Preserve in the northern part of the Brooks Range. In addition, even when the herds still become accessible to our members, in many cases it is at the increased cost of time and money to travel farther afield to find the animals.

Due to the population decline and through the population based management recommendations from the Western Arctic Caribou Herd Working Group, we have recently agreed with reduced bull and cow harvesting opportunities and if the population continues to decline we will support more restrictive; bag limits, cow hunts, and seasons. It should be noted, if the population decline continues, that under these same WACHWG recommendations, will come further harvest opportunity reductions for local residents, in addition to the removal of non-local hunting opportunities, in a manner similar to the proposed special action, but also including state lands. These further restrictions are proposed to kick in when the herd decreases below 200,000, a level at which they may already be, given the population estimate of 235,000 from 2013 and the recent population decline trajectory. The point being, that this action and these discussions, are likely to have already been present if we had obtained a count last summer and they are just as likely as not, to be again broached after the count this summer (if it is successful) and shows the population to have fallen below 200,000. If however, the count shows a growth, then this special action in place for only a year may be done away with. This is a proactive measure in that regard and instituting it would demonstrate that the FSB is responsive to the needs and concerns of the local residents who rely on this herd and who are already making sacrifices, demonstrating their commitment to a responsible approach to the management and future health of the WACH. In addition, it would also demonstrate that the federal government takes the promise of the subsistence priority elucidated in ANILCA, seriously.

Having participated in this process of vetting the proposal it has come to our attention that one of the concerns relates to tribal members who are not considered federally qualified subsistence users since their permanent residence is outside the region. Looking at the areas affected and taking into consideration that these non-resident members are already not considered federally qualified for hunting in Cape Krusenstern National Monument, or the Kobuk Valley National Park, in addition to knowing where the majority of fall and winter hunting activity occurs, it is our belief that there will still be ample opportunity for these members to hunt in the region, as most of the traditional boat and snowmachine hunting occurs on land outside of the federal lands in question.

We believe putting in place the special action has a real chance of improving the overall migration and flow of animals southward through the Brooks Range and increase opportunity for our members to harvest them, while decreasing the cost and time involved to do so.

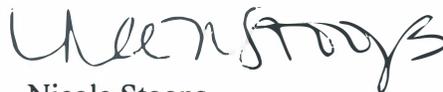
In summary, for all the reasons listed above, we fully support the Special Action Request and strongly encourage the Federal Subsistence Board approve it.

Thank you for the opportunity to comment and for considering our viewpoints.

Sincerely,



Alex Whiting
Environmental Specialist



Nicole Stoops
Executive Director

Testimony for proposal WSA 16-01

UNIT 23- proposal comments (SUPPORT)

Gordon Brower, North Slope Resident

Dear Federal Subsistence Board:

I am Gordon Brower, a Life-long resident of Barrow, Alaska- Region –10 area- subsistence hunting “Barrow Area of influence” as described in the comprehensive land use plan for Barrow, Alaska. I am going to write in bulleted format to convey issues facing rural subsistence priority concerns, emphasizing on a declining trend of the Caribou herds that service over 34 communities in the path of Western Arctic, and the techsiqpuq caribou herds.

- Declining herd trend **10-years of liberal hunting**

I have been on the Region 10, NSRAC from 1998-2008 and 2011-2016, over those years we have a trend of a consistent decline - from 490K to 230K caribou for the Western Arctic Herd, a similar trend exist for the Teshekpuk and the Porcupine Herds. Alarming concerns of counts and manipulation have been observed by the RAC’s- in 2015 November 4 & 5 the NSRAC met in Anaktuvak Pass to hear village concerns. ADF&G provided population estimates and talked about “amounts necessary for subsistence” (ANS). In calculating to maintain a liberal harvest management of the herds (Western & Teshekpuk) after observing 10-years of consistent decline- an internal management decision was made by ADF&G to artificially keep the ANS for western arctic herd high by combining or add the Teshekpuk herd administratively. The NSRAC asked ADF&G- if the Western and Teshekpuk caribou herds had independent ANS would they support a liberal hunting management. In the public hearing ADF&G responded—separating or calculating the two herds independently (Western & Teshekpuk) could not support non-resident hunts and put the herd on a threshold that would require Tier hunt evaluation. Right now the State is doing all it can to redirect the controversial decision it made- to internally in 2014 to add ANS to the Western herd of that of the Teshekpuk herd, by trying to look as far back as possible, which is only grasping in the air for answers. The fact of the matter- the ANS separated won’t support nonresident hunts, and furthermore, requires the state to start a tier hunt regime, and do it for village needs. In 2015, Communities of Barrow, Wainwright, Nuiqsut, hunted for the community of Anaktuvak pass, again the caribou failed to come to the village. The cost of chartering flights to haul to the community only to be born of the oil & gas folks and the regional corps. This is becoming common as the large herd is in decline, the migration is impacted for various reasons. The community of Noatak experiences the same issues.

- Conflicts in “village area of influence”

Local rural communities have a space recognized as "area of influence" this describes local hunting boundaries. In looking at conflicts that exist from non-rural residents it is important for managing for public use of natural resource such as caribou, even in times of liberal management these

comprehensive planning documents describing "village area of influence" giving deference to the community. This will eliminate user conflict and provide for a meaningful subsistence experience for rural residents, and guide land managers, to work with impacted communities on best locations for the rest of the Alaska resident population for their resident hunts- there should never have to be unreasonable impacts to rural areas, or the "village area of influence"

- Alaska Resident-

For those that hunt in Alaska as a resident (Anchorage, Fairbanks, and others,) these hunters have impacts so profound- it creates a feeling of "we don't belong", the system is broken, displacement and over running local rural hunting areas, deflecting entire migratory routes out of reach of villagers, displaced from the "village area of influence". There is a disconnect in Alaska, with urban areas, with the land managers who often manage lands without ensuring rural residence are afforded any rights or priority, unless the resource is depleted, never recognizing established planning standards, such as a village comprehensive plan and its "village area of influence" with OSM and ADF&G. Because of having no regard by all of these entities to the "village area of influence" described in many village comprehensive land use plans- degrading rural residence who have to pool resources together to provide food on the table while the cost of living in our communities are 3 & 5 times greater than urban areas of the state, not even taking into account that we don't have "McDonalds" or "Walmart" in the rural areas. Our villages do go hungry; when school teachers report, little children come to school hungry- and now recognize school is a place to get one meal that may not get at home- knowing the caribou having not made it to communities is becoming a normal dilemma. Look at these issues and manage correctly- orderly, respectfully, our communities need to be successful when gas is \$12 a gallon. Eliminate user conflicts- zone areas for resident hunts or something. It is the right time to talk about this as the state, and feds have managed so liberally, never minding the issues they create- now villages are going hungry from your doing.

- Depletion of available resources by "deflection" "and competition"

I want to emphasize to the State, the Federal subsistence boards- even when subsistence resources are plenty and managed liberally for all residents and non-residents, the actions you take can and have depleted subsistence resources from the "village area of influence". Putting guides and hunting activities in areas conflicting with rural and the village area of influence have deflected major caribou movements. The State & Federal game management systems allows hunt for trophy at the same time is allowing families in rural communities to go hungry. Deflection of caribou from areas normally found for rural and village needs- is the "depletion" of those resources, and is unreasonable and therefore unacceptable. Better planning is needed, including developing all village area of influence areas- into "Tier hunt" areas on state lands- this would be designed to maintain normal migratory movements in reach of where the herds would be normally found for villagers; in federal public lands- an equal measure to manage the "village area of influence" indefinitely protected as rural subsistence priority

and only open to rural residents. Real planning has to be established to balance the needs of our communities.

- Traditional hunting experience” lack of management” free for all.

Today there are no measures to balance the needs of rural residence to enjoy a peaceful traditional subsistence experience to pass along to the next generation. Right now you can find hunts going on to put a trophy on the wall, while several villager pool resources together to try put food on the table- often the non-resident, and those hunting from Anchorage and Fairbanks have airplanes and resources only available to outsiders and compete directly with village needs. 85% of the villages are not gainfully employed- making a second attempt at harvesting- a decision if utility bills, or other needs go unmet. Better planning is needed. Perhaps for economic reasons village corporation could delineate corporation lands- and restrict access to those corporation lands to help with the issues. Each village has an ANCSA corp.

- Solutions-

Finding solutions is needed. One measure is now upon us now based on caribou populations across Alaska. In particular the Western Arctic herd, the Teshekpuk herd being tied up as well, we know that herd is much smaller. Over 34 communities depend on a healthy herd size to provide food in our villages. We don't want to wait until any further decline occurs to change the management of the harvest. This is a start--- we must do a lot more to make sure villages have meaningful traditional experiences, and never subject rural uses to directly compete for food with non-residents and the general Alaska resident- Plan out where its appropriate and not appropriate. Stop letting our kids in the rural areas go hungry- stop it, fix it. I support unit 23- restriction to allow only rural residents- in addition, to work with Parks, and refuges to affect the same.

Thank you for the opportunity to provide comments

Gordon Brower, Rural resident of Barrow



U.S. Fish and Wildlife Service
Bureau of Land Management
National Park Service
Bureau of Indian Affairs



Forest Service

Federal Subsistence Board News Release

For Immediate Release:
April 18, 2016

Contact: Chris McKee
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Federal Subsistence Board closes Federal public lands to caribou hunting

The Federal Subsistence Board (Board) has approved Temporary Special Action WSA16-01, closing Federal public lands in Unit 23 to caribou hunting by non-Federally qualified users effective July 1, 2016 and continuing through June 30, 2017.

The Board felt that there was sufficient evidence indicating that the closure was necessary to allow for the continuation of subsistence uses and for conservation of a healthy caribou population as mandated under ANILCA Section 815.

The public testimony expressed to the Board by residents of the area, the support of the special action request by the two affected Regional Advisory Councils, and the current status of the herd, compelled the Board to take action. A closure to all but Federally qualified subsistence users is consistent with providing a subsistence priority for use of the resource; to assure that a rural preference is provided; and recognizes the cultural and social aspects of subsistence activities, which may be hampered by direct interaction between local and non-local users.

Additional information on the Federal Subsistence Management Program may be found on the web at www.doi.gov/subsistence or by visiting www.facebook.com/subsistencealaska.

Missing out on the latest Federal subsistence issues? If you'd like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing fws-fsb-subsistence-request@lists.fws.gov.

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