



## Federal Subsistence Board

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FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

August 07 2024

In Reply Refer To:  
OSM.A24100

Thomas Baker, Chair  
Northwest Arctic Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1101 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chair Baker:

This letter responds to the Northwest Arctic Subsistence Regional Advisory Council's (Council) Fiscal Year 2023 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to respond to these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of the issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

**1. Addressing the impact of hunter placement by transport services on caribou migration**

*The locations where transport services drop off hunters are a major concern, as often these transportation actions and associated hunter activities disrupt or alter caribou migration routes, attract predators, and sometimes interfere with local hunting efforts. The Council requests the Board to direct agencies to establish local observer programs. Local observers can document and report harassment cases, especially those affecting caribou migrations and river areas. Additionally, the Council calls for educational initiatives targeting air transporters and non-local hunters.*

**Response:**

The Board met April 2-5 and adopted wildlife regulatory proposal WP24-30/31 that was submitted by your Council and North Slope Subsistence Regional Advisory Council. This closes Federal public lands in Unit 23 to caribou hunting by non-federally qualified users from August 1 to October 31 unless the Western Arctic Caribou Herd population exceeds 200,000 caribou.

Any non-federally qualified users flying in to hunt caribou on federal lands during this closure, harassment of caribou, or other illegal activities should be reported to local law enforcement officials.

If communities in the NW Arctic region are interested in establishing local observer programs to document caribou migration, behavior, health, and environmental conditions or other information, the National Park Service does have a small amount of annual funding to support subsistence research and monitoring projects with Park resident zone communities (in the NW Arctic region this includes all residents of the NANA region). If interested, communities and Tribes can reach out to Western Arctic Parklands Subsistence Coordinator Emily Creek to discuss possible approaches to submit a proposal for funding. The National Park Service Alaska Regional Office administers this subsistence funding and a call for project proposals goes out each fall and generally closes in October. Another resource that may be of interest is the Indigenous Sentinels Network (ISN): [www.sentinelnetwork.org](http://www.sentinelnetwork.org). ISN has developed tools and support for community-driven and Indigenous-led monitoring programs. ISN is a tool for recording and communicating significant environmental and ecological events in order to empower remote communities dealing with the effects of climate change. ISN uses the approach of an internet-based system (i.e., online database, smartphone or template apps, etc.) that enables communities across Alaska and beyond to implement rigorous monitoring programs while utilizing ISN's well-refined environmental database.

Another resource managed through the Alaska Native Tribal Health Consortium is the Local Environmental Observer (LEO) Network. LEO is a network of local environmental observers and topic experts who apply traditional knowledge, western science, and technology to document significant, unusual or unprecedented environmental events across rural Alaska communities. The LEO Network utilizes web-accessible maps to display observations which are then shared with network members. The maps contain descriptions, photos, expert consultations, and links to information resources. LEO Network is available through the web app at [www.leonetnetwork.org](http://www.leonetnetwork.org). If the Council is interested in targeted caribou educational outreach tools, it can connect with locally based Caribou Hunter Success Working Group, which seeks to perpetuate traditional Iñupiaq hunting values. The group is comprised of community and Tribal representatives, and each of the Northwest Arctic region agencies and organizations: NANA, Maniilaq, National Park Service, U.S. Fish and Wildlife Service, Alaska Department of Fish and Game., and Northwest Arctic Borough; Council members can also be involved. The Hunter Success Working Group has previously worked on educational outreach and informational flyers to convey traditional values and best practices around caribou hunting and could work with the Council to develop additional targeted education outreach. Examples of education flyers that were developed are enclosed (Topic 1 Encl. A & B). If the Council would like more information and to connect with the Hunter Support Group, Western Arctic Parklands Subsistence Coordinator Emily Creek has offered to help be a point of contact and can be reached at [emily\\_creek@nps.gov](mailto:emily_creek@nps.gov) and by phone at 907-412-0229.

## **2. Local observation and monitoring of climate change**

*The Council is deeply concerned about climate change and its impact on local resources and*

*communities. This concern highlights the necessity of establishing additional programs that actively engage local subsistence users in monitoring and recording climate-related observations and associated impacts on wild resources, their habitats, and the environment. Moreover, the Council stresses the importance of encouraging resource management agencies to actively participate and to collaborate with local entities, such as Tribal, Borough, and City Governments in climate monitoring. This collaborative approach is seen as a way to achieve a more comprehensive and effective strategy for addressing the challenges posed by climate change in the region.*

**Response:**

Thank you for bringing the issue of climate change impacts on local resources and communities to the Board's attention and the need to establish additional programs to engage local subsistence users in climate change monitoring. The Board takes this issue seriously and acknowledge climate change is a major threat to the cultures of the people who live in Alaska. We also acknowledge that climate change is an intractable global problem. As community leaders and land managers, we are committed to doing all we can within our capacity to address this issue here in Alaska.

In 2021, Department of the Interior developed a Climate Action Plan, which is available online at <https://www.doi.gov/sites/doi.gov/files/departments-of-interior-climate-action-plan-final-signed-508-9.14.21.pdf>. The Departmental Climate Action Plan highlights that rural, indigenous, and Tribal populations are disproportionately affected by the climate change impacts. In the Department's Policy Statement for Climate Adaptation and Resilience Secretary of the Interior Haaland says that "planning and decision-making will use the best-available information that considers existing and projected climate change vulnerabilities, risks, and impacts. Decision-making will also consider traditional knowledge, and the Department will meaningfully consult with Tribes and other indigenous communities throughout decision-making processes that affect their interests."

The Board would like to share with you some on-going efforts of Federal agencies in climate change monitoring and utilizing local observations. You can learn about the U.S. National Park Service strategies to address climate change at <https://www.nps.gov/subjects/aknatureandscience/ccaction.htm> and how indigenous and traditional knowledge is utilized to adapt to climate change at [High-latitude Climate Change - Alaska Nature and Science \(U.S. National Park Service\) \(nps.gov\)](https://www.nps.gov/subjects/aknatureandscience/high-latitude-climate-change-alaska-nature-and-science) The Council can reach out to the U.S. National Park Service on specific topics of research in Northwest Arctic and request a presentation.

In April 2024, the U.S. Fish and Wildlife Service completed Climate Action Plan for Alaska Region that outlines many of the initiatives to monitor climate change impacts in your Region and across the state, many of which incorporate resident observations and traditional knowledge (Topic 2 Encl.). You can also more about the U.S. Fish and Wildlife Service strategies to address climate change at <https://www.fws.gov/initiative/climate-change>.

Because climate change is already apparent in the Arctic and is expected to lead to profound changes in ecosystem dynamics, Selawik National Wildlife Refuge, in cooperation with other researchers and agencies, works to monitor wildlife populations and gain a better understanding of the natural systems within refuge habitats. You can learn more about their ongoing projects at <https://www.fws.gov/refuge/selawik/what-we-do/projects-research>.

The Board suggests your Council Coordinator invites agency representatives to your next Council meeting to provide an overview of the ongoing programs and projects. It will also be a good opportunity for them to learn about any local and regional monitoring projects that they can partner up with.

**3. Support for local hunters to aid in their capacity to harvest resources for their communities**

*The Council expresses concern over the escalating difficulties confronted by local hunters including dwindling caribou populations, increasing fuel and equipment expenses, and the effects of climate change on resources and the environment. The Council strongly advocates for increased support to assist hunters in their missions to provide sustenance for their families and communities. It is imperative that the Board and agencies devise mechanisms that streamline the permit acquisition process, including expanding permits for muskoxen to other communities other than Buckland, provide quicker responses to special action requests and regulatory proposals, and provide flexibility in regulations that would allow for legal access to resources when resources are available, especially in light of the diminishing caribou populations. In addition, programs that provide grants for monetary support to hunters for fuel and ammunition would be helpful.*

**Response:**

First, recent changes to Federal regulations have expanded the pool of users eligible to hunt muskoxen on public lands in the Northwest Arctic. Wildlife Closure Review WCR24-19, the closure of Federal lands to muskox hunting by non-federally qualified users in the southeastern portion of Unit 23, was rescinded at the Federal Subsistence Board (Board) meeting in April 2024. This will allow any user to harvest muskoxen on Federal lands in Unit 23 under State regulations with a State Tier II permit, effectively expanding the pool of eligible harvesters. If the Council wishes to expand the pool of eligible harvesters under Federal regulations, a proposal may be submitted to the Federal Subsistence Board during their next wildlife cycle to modify the customary and traditional use determination for muskox in Unit 23. Proposal WP24-27 was adopted at the April 2024 Board meeting as well, which changed the Units 22 and 23 Federal muskox hunts to draw permit hunts and standardized the delegation of authority letter (DAL) language for these hunts, streamlining the permitting process.

Second, the Federal Subsistence Management Program provides several options for subsistence users to quickly change regulations. Special action requests are processed and finalized by the Board as quickly as possible, in relation to the time constraints of each request. Regulatory proposals are processed along an established timeline, which takes about one year to complete.

The Board does delegate some authority to Federal land managers with direct management over specific resources to make this decision process quicker, more flexible and involve more user input. Land managers with Delegated Authority may have the flexibility in regulation to allow for access to resources when they are available. The Board encourages the Council to provide feedback on these processes and new ideas that will better enable fast responses in regulation to environmental change.

#### **4. Concerns of rising beaver populations**

*The Council is deeply concerned about the rising presence of beavers in the region, particularly their construction of dams that cause flooding and hinder the movement of four whitefish species that are vital for subsistence. This increasing beaver population poses a significant challenge to subsistence fishing, disrupting the natural migration of whitefish, salmon, and Dolly Varden in traditional harvest areas. The Council attributes the altered beaver behavior to global warming.*

*At the Winter 2023 Council meeting, members were briefed on the Arctic Beaver Network studies in Alaska's Northwest and Arctic regions. Financed by a National Science Foundation grant, these collaborative studies, led by the University of Alaska Fairbanks, NPS, and ADF&G Division of Subsistence, focused on ecological expansion, range studies, and Traditional Knowledge research on beavers and their impacts on fish, subsistence, and community health. The Council strongly supports integrating Local and Traditional Knowledge in these and other regional resource studies, aiming for preventive solutions. In response to identified challenges, the Council advocates for programs clearing beaver dams in traditional subsistence fishing streams and supporting local communities through initiatives like trapping and fur processing.*

#### **Response:**

Thank you for sharing the Council's ongoing concern about the impacts of beaver activity and the need for proactive solutions. The Board acknowledges that Local and Traditional Knowledge is vital both for understanding and for addressing the impacts of increased beaver activity on the ecosystem. The Council may be interested to know that Federal partners such as Selawik Refuge have continued to provide logistical support for UAF-led beaver studies in the Northwest Arctic region. In February 2024, the Refuge collaborated with other agencies and UAF to support subsistence users' attendance at the Arctic Beaver Observation Network (ABON) meeting in Fairbanks. Additionally, Office of Subsistence Management has invited the lead researcher on the Arctic Beaver Observation Network study to present an update on the project to the Council at an upcoming meeting. As presented to the Council previously, this work continues to integrate Local and Traditional Knowledge, specifically through engagement with the communities of Kotzebue, Noatak, and Shungnak. More information can be found at <https://www.doi.gov/sites/doi.gov/files/tab-12-.adfg-sub-arctic-beaver-network-and-tekpresentation-nwarac-march-2023-508.pdf> (also see Topic 4 Encl.) and <https://www.arcus.org/witness-the-arctic/2023/5/highlight/3>.

#### **5. Increasing muskox presence**

*The Council is troubled by muskox herds damaging infrastructure around communities. Safety concerns arise due to the proximity of muskoxen to people, especially children. The Council would like to have agencies provide more help to repel muskox from communities, and advocate for increased hunting opportunities to manage muskox populations near affected areas.*

**Response:**

Federal agencies do not partake in harassment and hazing of wildlife. Furthermore, Federal agencies only have jurisdiction on Federal public lands, which generally are not close to communities. To expand the Federal opportunity to legally harvest muskox, please see the response to Issue 3. To expand harvest opportunities under State regulations, the Alaska Board of Game recently adopted Proposal 209 as amended to establish a subsistence muskox hunt on the Sisualik Peninsula in Unit 23, effective for the 2024/25 regulatory year. This new season runs from June 1 through October 31, with up to four permits available.

**6. Concern of increasing predator populations that are contributing to the declines of game populations and need for dietary composition surveys of wolves**

*This issue was highlighted in the Council's FY-2022 annual report and continues to be a significant concern. The Council is troubled by a noticeable rise in bear and wolf populations in the region, along with the consequential impacts on the diminishing caribou population. Furthermore, the Council advocates for continued research to explore and implement best management practices in addressing these challenges. In addition, the Council would like to see agencies conduct dietary composition surveys of wolves to understand their impact on the ecosystem and inform conservation efforts.*

**Response:**

The Board recognizes the Council's on-going concern regarding the increasing predator populations that are potentially contributing to the declines of game populations. The Board suggests that you write directly to the land management agencies in your region to request an update on the on-going research on this topic as well as to suggest that agencies conduct dietary composition surveys of wolves.

**7. Bycatch and depletion of resources in Bering Sea**

*The Council is troubled by the potential link between the extensive operations of factory trawlers, specifically those deploying large nets that drag the bottom of the Bering Sea, on marine resources. This fishing method, combined with climate-related changes, is believed to be intensifying the shortage of food for oogruk (seals), seabirds, salmon, and other fish vital to the ecosystem in Northwest Alaska. Moreover, the Council is also concerned about the significant bycatch of fish, particularly when it involves salmon destined for natal streams, crucial for subsistence in Western and Northwest Alaska. These salmon are caught but unfortunately discarded back into the sea, posing a serious threat to both the local environment and the sustenance of communities.*

**Response:**

The Board acknowledges that commercial fishing is likely having adverse effects on the ecology and abundance of fish, which has other ecological implications throughout the food web in the Bering Sea. Other Councils have also voiced a similar concern in the past. The Board met in-person with the Secretary of the Interior in October 2023 and shared many of their concerns with the Secretary as part of that meeting. These issues were further reiterated as part of the meeting follow-up memo shared with the Secretary of the Interior and the Secretary of Agriculture (Topic 7 Encl. 1).

During the March 5-8, 2024, Federal Subsistence All Council Meeting the Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic, Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils drafted a formal letter to the Board asking for action and to elevate to the Secretaries of the Interior and Agriculture and requesting Secretarial action as well. The Board has written and transmitted this joint letter to the Secretaries on July 29, 2024, (Topic 7 Encl. 2) and will follow up with the Councils with any responses provided by the Secretaries.

As OSM finalizes its move to the Office of Policy, Management, and Budget within the Office of the Secretary of the Interior, the Board will seek opportunities to establish more direct communication with the Secretary's Office. The Board is already taking steps to meet with the Secretary on a few critical subsistence issues, one of which continues to be bycatch, and the need to liaise with the Department of Commerce on this important issue.

The Board commends the Councils for their advocacy on subsistence issues in their region and encourages this Council to remain vigilant in amplifying bycatch issues that have unintended consequences for subsistence and implications to the marine food web.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts and am confident that the federally qualified subsistence users of the Northwest Arctic Region are well represented through your work.

Sincerely,



Anthony Christianson  
Chair

Enclosures: Topic 1 Encl A – NPS Native Village of Kotzebue winter hunt  
Topic 1 Encl B – NPS Hunter's Success flyer  
Topic 4 Encl – ADF&G Sub Arctic Beaver Network and TEK  
Topic 7 Encl 1 – Memo FSB to SOI re Program Needs

cc: Northwest Arctic Subsistence Regional Advisory Council  
Federal Subsistence Board  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department Fish and Game  
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of  
Fish and Game  
Administrative Record