

**North Slope Subsistence Regional Advisory Council**  
c/o Office of Subsistence Management  
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**MAY 14 2020**

Anthony Christianson, Chair  
Federal Subsistence Board  
c/o Office of Subsistence Management  
1011 E. Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The North Slope Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2019 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 in Point Hope on October 23-24, 2019, the Council identified concerns and recommendations for this report. The Council approved this annual report at its winter 2020 meeting in Utqiagvik. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA, the Federal Subsistence Management Program's Fisheries Resource Monitoring Program (FRMP), critical subsistence research priorities, and the continuation of subsistence uses in the North Slope Region when faced with a changing environment.

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

The Council has had extensive discussion about the importance of caribou, sheep, moose, fish, and other subsistence resources to communities across the North Slope Region and expressed concern about climate change and development impacts on these critical resources. The Council is very concerned about these ongoing and increasing impacts to communities' subsistence resources and subsistence way of life. Many fish and wildlife populations across the North Slope Region are experiencing a decline or exhibiting signs of stress such as increased incidence of fish mold, seabird die-offs, and sick seals. A new, extremely concerning change took place this past fall when no bowhead whales were sighted off the coast of Utqiagvik, and the community was not able to harvest any whales. Whales feed entire communities across the North Slope, are shared and traded widely for other subsistence foods, and are central to the culture and traditions of the Inupiaq people. The Council is very concerned that either changes in the marine environment, or disturbance from industrial activities, have caused the bowhead whale to change its migratory path or caused a decline to the population. Whatever the cause, absence of the usual fall whale

harvest has left the community in dire circumstances. Utqiagvik and other communities across the region literally missed tons of healthy subsistence food. The Council recognizes that marine mammals are outside of the Board's jurisdiction; however, the Council wants to engage with the Board to work on subsistence management strategies and avenues to ensure that communities will have enough of other subsistence resources to sustain them in these times. The absence of whales has created much greater need for foods such as fish, moose, sheep, and caribou that are managed by the Federal Subsistence Management Program. Opportunity to increase harvest of these other subsistence resources will be imperative for food security.

## **2. Subsistence fisheries research priorities critical to North Slope communities**

The Council seeks to work with the FRMP to address critical subsistence fisheries research needs in the North Slope Region. A primary request to the Board at this time is to reconsider FRMP funding for the study of contaminants in subsistence fisheries. The Council is extremely concerned about environmental change and contaminant impacts to subsistence fisheries across the North Slope Region. In particular, the Colville River and tributaries are essential to the community of Nuiqsut for subsistence harvest of Broad Whitefish, Humpback Whitefish, Arctic Cisco, Burbot, and Grayling. This river has experienced warming waters and industrial contaminants have caused water pollution for many years. The community is hurting from these negative effects on the fish. People are going hungry and yet are afraid to eat their traditional subsistence fish because of the concerns about contamination. The community has struggled to find independent research on fish habitat, water quality, and contaminants testing of subsistence caught fish. Having the industry responsible for the pollution conduct the contaminants research is suspect, and local communities don't trust these industry reports. Council members have expressed frustration with the challenge to have studies funded through the FRMP program. While the Council recognizes that the FRMP has not funded contaminants studies directly in the past; in reality, contaminants have an impact on access to healthy subsistence foods and are causing traditional subsistence fish harvest patterns and success to change dramatically. The FRMP is supposed to support continuation of subsistence uses and management of sustainable subsistence fisheries but the prevalence of fish mold and contaminants has drastically impacted the community's ability to continue using these important subsistence resources. The Council and the community of Nuiqsut are very interested in engaging directly with the Federal Subsistence Management Program and collaborating with researchers through the FRMP process to find an avenue forward to address this issue.

## **3. Council appointments and need for representation from all North Slope Region communities**

In the past few years, the Council has grown increasingly concerned regarding multiple vacant seats on the Council and the lack of appointments to fill these seats. Several long serving Council members have not been re-appointed and new applicants have not been appointed. To exacerbate the situation, some Council members recently passed away or moved out of region and no alternates were appointed to these seats. This has left a real gap on the Council with several vacancies (2015 – 4, 2016 – 3, 2019 – 3, 2020 – 3), and many North Slope Region communities are not currently represented. In particular, it is very important to insure that Anaktuvuk Pass has representation on the Council to address that community's unique

subsistence needs and challenges due to their inland mountainous location and reliance on caribou. Indeed, all eight communities across the North Slope region are unique in their subsistence knowledge and way of life and need to be represented for the Council to be fully effective in its duties. The Council wishes to convey to the Board the importance of having representation from each of these communities and requests adequate appointments to achieve balanced membership. The Council also would like to reiterate the importance of holding Council meetings in each of the eight villages in the North Slope Region in order to work with each community and respond to their subsistence issues directly as well as increase engagement to attract new applicants to serve on the Council.

#### **4. Subsistence priority, continuation of subsistence uses, and community area of influence**

The Council would like the Board to address issues of rural subsistence priority, meeting subsistence needs, and traditional use areas around communities in the North Slope region.

In deliberation on fish and wildlife management proposals over the past few years, the Council has expressed repeated concerns about management of Federal lands around villages so that subsistence resources are not deflected away from traditional use areas and that the local rural subsistence users have priority to harvest these resources over other uses or users. Industrial development and non-rural resident hunting or guiding activities have the potential to take or deflect subsistence resources that, in effect, prevent subsistence priority and continuation of subsistence uses in traditional use areas.

The Council recommends that any development proposal should consider the work of the North Slope Borough in identifying the “area of influence” around communities in the North Slope Region to help delineate subsistence hunting, fishing, and gathering areas of each community. Even during liberal subsistence management strategies, it is possible to deplete local North Slope resources by deflecting caribou and other subsistence resources through sport or nonlocal Alaska resident use. This can cause hardship and, in some cases, reduce needed food resources for local rural residents and those with a customary and traditional use determination within the village area of influence.

The Council would like the Board to consider the “area of influence” for subsistence communities in making future subsistence management decisions affecting the North Slope Region. Issues of traditional and contemporary use of subsistence resources surrounding the community is such a serious matter that the North Slope Borough has adopted village comprehensive plans into law through local ordinance. Local ordinances provide good guidance to land managers on village subsistence issues. The Council encourages the Board and Federal land managers to meet with the North Slope Borough to learn more about the “community area of influence” concept and develop management strategies to better address continuation of subsistence uses in these areas.

Further, the Council strongly believes that rural subsistence priority on Federal lands should not be reduced by dual State management of subsistence resources. Many Federal lands are open to nonresident or all state residents under State hunting and fishing regulations, including areas with very limited resources and very high local subsistence needs (e.g. Unit 26A moose). The

Council requests that comprehensive population estimates of important subsistence food resources be evaluated and the needs of the rural communities be assessed to ensure a subsistence priority is being met before allowing a hunt to be open or remain open to other users. In times of conservation for caribou, moose, and sheep population, or decline of other subsistence resources, and, most importantly, increasing food insecurity, it is paramount that a rural subsistence priority be maintained as provided for under Title VIII of ANILCA.

The North Slope Subsistence Regional Advisory Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the North Slope Region. If you have any questions regarding this report, please contact me via Eva Patton, Subsistence Council Coordinator, with the Office of Subsistence Management at [eva\\_patton@fws.gov](mailto:eva_patton@fws.gov), or 1-800-478-1456 or (907) 786-3358.

Sincerely,



Gordon Brower  
Chair

cc Federal Subsistence Board  
North Slope Subsistence Regional Advisory Council  
Susan Detwiler, Assistant Regional Director, Office of Subsistence Management  
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Interagency Staff Committee  
Administrative Record