

Western Arctic Caribou Herd Working Group

December 11 - 12, 2024

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Western Arctic Caribou Herd (WACH) Working Group Meeting

December 11-12, 2024, 8:30am - 5:00pm

Marriott Anchorage Downtown
820 West 7th Ave., Anchorage, AK 99501

Western Arctic Caribou Herd Working Group Mission:

“To work together to ensure the long-term conservation of the Western Arctic caribou herd and the ecosystem on which it depends, and to maintain traditional and other uses for the benefit of all people now and in the future.”

DAY 1 – Wednesday, December 11

8:30 Call to Order

- Invocation
- WACH Working Group Roll Call / Establish Quorum
- Introduction of State and Federal Agency Leads
- New Working Group Member & Alternate Appointments
- Approval of Agenda – Preview Meeting Binder

8:40 Guest Elder – Fred Eningowuk, Shishmaref (50 min)

9:30 Round Robin Updates – What’s been going on since 2023? (60 min)

What has everyone been up to since the last working group meeting? Please take a few minutes each to share your update.

10:30 Break (15 min)

10:45 Western Arctic Caribou Herd Status and Management Level (60 min)

10:45 Western Arctic Herd Overview and 2024 Census (30 min) – Alex Hansen, Alaska Department of Fish and Game (ADFG)

11:15 Caribou Bull: Cow Ratios (30 min) – Alex Hansen, Alaska Department of Fish and Game (ADFG)

11:45 LUNCH (90 min)

1:15 Western Arctic Caribou Herd Status and Management Level (continued)

NPS Caribou Monitoring (30 min) - Kyle Joly, National Park Service (NPS)

1:45 Working Group discussion and decision on Herd Management Level per the 2019 WACH Cooperative Management Plan (30 min)

Review Technical Committee recommendation on status of the herd.

2:15 Alaska Board of Game: A review of the Alaska Board of Game Process (45 min) – Dave Lorrington, Board Member, Alaska Board of Game

3:00 BREAK (15 min)

WACH Working Group Meeting – Agenda (continued)

- 3:15 Federal Subsistence Board: A review of the Federal Subsistence Board Process** (45 min) – Lisa Grediagin, Supervisory Biologist and Robbin La Vine, Policy Coordinator, Department of the Interior, Office of Subsistence Management
- 4:00 Summary of Regulation Changes by the Board of Game and Federal Subsistence Board** (45 min) – Alex Hansen, Alaska Department of Fish and Game and Wil Wiese, Selawik National Wildlife Refuge
- 4:45 ADJOURN DAY 1**

DAY 2 – Thursday, December 12

- 8:30 Call to Order / Announcements / Review Day 2 Agenda**
- 8:35 Resource Development in the Herd's Range** (45 min) – Tim Fullman, Resource Development Committee Chair
- 9:20 Knowledge of the Caribou: A Database for Accessing Working Group Observations** (40 min) – Ophelie Couriot, PhD, Post Doctoral Associate, State University of New York, College of Environmental Science and Forestry
- 10:00 Communications, Education, and Outreach Update** (30 mins) – Deb Lawton, Wildlife Education Associate – Region 5, Alaska Department of Fish & Game Division of Wildlife Conservation
- 10:30 BREAK** (15 min)
- 10:45 Business Meeting – Actions - Assignments** (60 min)
- Review and Confirm Any Day 1 Actions and Resolutions
 - Approval of 2023 WACH Working Group Meeting Summary
 - Committee Membership – Revise / Reconfirm
 - WACH Working Group Membership – Discuss process for identifying and confirming members and alternates
 - Election of Chair
 - Business / Action Items & Confirm Assignments
 - Next Meeting – Date / Location
- 11:45 LUNCH** (90 min)
- 1:15 Business Meeting (CONTINUED) – Actions - Assignments** (120 min)
- Review and Confirm Any Day 1 Actions and Resolutions
 - Approval of 2023 WACH Working Group Meeting Summary
 - Committee Membership – Revise / Reconfirm
 - WACH Working Group Membership – Discuss process for identifying and confirming members and alternates
 - Election of Chair
 - Business / Action Items & Confirm Assignments
 - Next Meeting – Date / Location
- 3:15 WORKING GROUP PHOTO** (30 min)
- 3:45 Closing Comments – Working Group members** (30 min)
- 4:15 ADJOURN**

**WESTERN ARCTIC CARIBOU HERD WORKING GROUP
MEMBERSHIP LIST, December 2024**

Working Group Seat	Primary Member	Alternate Member*
1. Anchorage Advisory Committee.....	Neil DeWitt.....	Matt Moore
2. Buckland, Deering, Selawik.....	Vida Coaltrain.....	Raymond Lee, Jr.
3. Anaktuvuk Pass, Nuiqsut.....	Eli Nukapigak	Mary Hugo
4. Elim, Golovin, White Mountain.....	Charles Saccheus	Morris Nakaruk
5. Fairbanks Hunters.....	John Wisniewski.....	John Siegfried
6. Hunting Guides.....	Justin Horton**.....	John (Thor) Stacey
7. Kivalina, Noatak.....	Enoch Mitchell	Daniel Foster, Sr.
8. Kotzebue.....	Cyrus Harris (Vice Chair).....	Thomas Baker
9. Koyukuk River.....	Jack Reakoff	Darrell Vent
10. Lower Kobuk River.....	Vern Cleveland, Sr (Chair).....	Kirk Sampson
11. Middle Yukon River.....	Michael Stickman.....	Arnold Demoski
12. Point Hope and Point Lay.....	Steve Oomittuk.....	Caroline Cannon
13. Nome.....	Charlie Lean.....	Jacob Martin
14. Conservationists.....	Tim Fullman.....	Alex Johnson
15. Northern Seward Peninsula.....	vacant	Johnson Eningowuk
16. Reindeer Herders Association.....	Tom Gray.....	Harry Karmun
17. Southern Seward Peninsula.....	Morris Nassuk.....	Leo Charles, Sr.
18. Transporters.....	Brad Saalsaa	Kiva McCarthy**
19. Upper Kobuk River.....	William Bernhardt.....	vacant
20. Atqasuk, Utqiagvik, Wainwright.....	Wanda Kippi	Joseph Leavitt

** double asterisks = need to be confirmed at the 2024 meeting

blue highlight = vacancies

strikeout = will not be in attendance 2024

green highlight = alternate in attendance 2024

* Alternate member attends when Primary member is not able to attend

Officers - Officers in the Working Group include a Chair and Vice-Chair elected by the membership. Each shall serve a staggered three-year term.

Current Chair and Vice Chair terms:

Chair, Vern Cleveland, Sr.	2023-2025
Vice-Chair, Cyrus Harris	2022-2024

The following communities are the geographic areas represented by the Working Group seats. (Community groupings were approved by the WACH Working Group in December 2012.)

- 9. Koyukuk River: Huslia, Hughes, Allakaket, Bettles, Wiseman
- 10. Lower Kobuk River: Noorvik, Kiana
- 11. Middle Yukon River: Galena, Koyukuk, Nulato, Kaltag
- 15. Northern Seward Peninsula: Teller, Brevig Mission, Wales, Shishmaref
- 17. Southern Seward Peninsula: Koyuk, Shaktoolik, Unalakleet, Stebbins, St. Michael, Kotlik
- 19. Upper Kobuk River: Ambler, Shungnak, Kobuk

WACH WORKING GROUP – COMMITTEES

December 2024

Name: Communications

Established: December 2011

Membership: 5 WG members, Agency staff
(The Communications Committee was created from the previous Education/Newletter Committee and the Webpage Committee by action at December 2011 meeting)

Members:

WG Chair 05	John Wisniewski	jr152@hotmail.com
WG Chair 10	Vern Cleveland (Ch.)	vernsr75@hotmail.com
WG Chair 14	Tim Fullman	tim_fullman@tw.org
WG Chair 16	Tom Gray	tom@akadventure.com
WG Chair 18	Ben Child	aeroexpeditions@gmail.com
ADFG	Deb Lawton	Deb.Lawton@alaska.gov
USFWS	Brittany Sweeney	Brittany_Sweeney@fws.gov
NPS	Kyle Joly	Kyle_Joly@nps.gov
BLM	Bruce Seppi	bseppi@blm.gov

Name: Executive

Established: January 2004

Membership: WG Chair, WG Vice Chair, 3 WG members

Members:

WG Chair 10	Vern Cleveland (Ch.)	vernsr75@hotmail.com
WG Chair 8	Cyrus Harris (V-Ch.)	charris@maniilaq.org
WG Chair 9 (alt)	Darrell Vent	dventsr@hotmail.com
WG Chair 16	Tom Gray	tom@akadventure.com
WG Chair 13	Charlie Lean	charlie@nsedc.com

Name: Local Knowledge/User

Established: May 2004

Membership: 4 WG members, Selawik NWR Manager

Members:

WG Chair 8	Cyrus Harris	charris@maniilaq.org
WG Chair 11	Michael Stickman	mickeystickman@gmail.com
WG Chair 17	Morris Nassuk	nassukm@yahoo.com
WG Chair 19	William Bernhardt	trapperbillkobuk@msn.com
USFWS	Will Wiese	wilhelm_wiese@fws.gov

Name: Resource Development

Established: May 2004 (formed as NPR-A Committee; renamed in February 2006)
Membership: 12 WG members, Agency lead staff
Revised: December 2011 – Increased from original 6 WG members to 7 WG members
December 2013 – Increased from 7 WG members to 12 WG members, to provide seats for members in area in vicinity of proposed road to the Ambler Mining District

Members:

WG Chair 2	Vida Coaltrain	vcolatrain@gmail.com
WG Chair 7	Enoch Mitchell	fishandgamerep@nautaaq.org
WG Chair 8	Cyrus Harris	charris@maniilaq.org
WG Chair 10	Vern Cleveland , Sr.	vernsr75@hotmail.com
WG Chair 11	Michael Stickman	mickeystickman@gmail.com
WG Chair 12	Steve Oomittuk	steveoomittuk@hotmail.com
WG Chair 14	Tim Fullman (Ch.)	tim_fullman@tw.s.org
WG Chair 16	Tom Gray	tom@akadventure.com
WG Chair 17	Morris Nassuk	nassukm@yahoo.com
WG Chair 19	William Bernhardt	trapperbillkobuk@msn.gov
ADFG	Tony Gorn	tony.gorn@alaska.gov
BLM	Bonnie Million	bmillion@blm.gov
USFWS	Will Wiese	wilhelm_wiese@fws.gov
NPS	Annie Carlson	ann_e_carlson@nps.gov

Name: Technical

Established: January 2004
Membership: WG Chair, Vice-Chair, 5 WG members (listed below); Agency staff.
(NOTE - December 2012 WG meeting – Decision that travel/per diem would be paid only for WG Chair and Vice Chair to attend TC meetings. December 2014 – WG decision to add Chair 13 to the TC. December 2016 – WG decision to add Chairs 1, 3, 7, 14 to TC.)

WG Members:

WG Chair 1	Neil DeWitt	neilfxrt84@msn.com
WG Chair 3	Eli Nukapigak	native.village@astacalaska.net
WG Chair 7	Enoch Mitchell	fishandgamerep@nautaaq.org
WG Chair 8	Cyrus Harris	charris@maniilaq.org
WG Chair 10	Vern Cleveland	vernsr75@hotmail.com
WG Chair 13	Charlie Lean	Charlie@nsedc.com
WG Chair 14	Tim Fullman	tim_fullman@tw.s.org

Agency TC members: Technical Committee agency membership is determined by the agency leads.

Information about past Working Group Committees:

Planning Committee – Established in December 2017 to work with agency leads to update the 2011 WACH Cooperative Management Plan. Committee sunset in 2019 following the Working Group’s approval to update the plan.

Education/Newsletter Committee – Established in January 2005. Functions were combined with Webpage Committee and renamed the Communication Committee by action at December 2011 meeting. The Education/Newsletter Committee no longer exists.

Funding Committee – Established in May 2004 as Tribal Grant Committee. Renamed in December 2009. The functions of this committee were moved to the Executive Committee by action at December 2011 meeting. The Funding Committee no longer exists.

Membership Committee – Established in December 2003. The functions of this committee were sunset by action at December 2011 meeting and work now accomplished by the Executive Committee. The Membership Committee no longer exists.

Webpage Committee – Established in December 2010. Functions were combined with Education/Newsletter Committee and renamed the Communication Committee by action at December 2011 meeting. The Webpage Committee no longer exists.

CHARTER

FOR THE WESTERN ARTIC CARIBOU HERD WORKING GROUP*

I. Authorities

- Public meeting laws of the United States and the State of Alaska
- Title 16 of the Alaska Statutes (management of fish and game)
- ANILCA (Section 809)

II. Purpose

The Western Arctic Caribou Herd (WACH) Working Group is a permanent regional organization of representative stakeholders that meets regularly to exchange traditional and western scientific knowledge and through a process of consensual decision making, the Working Group coordinates suggested management guidelines to both the Alaska Board of Game and the Federal Subsistence Board.

Through these activities, the Working Group intends to ensure the conservation of the Western Arctic Caribou Herd, safeguard the spiritual and cultural well being of Alaska Natives and the interests of all users of the herd and to integrate indigenous knowledge with western science.

III. Goals and Objectives

- G1. To insure health and conservation of the WACH*
- a. Emphasize protection of critical habitat (migration routes, calving grounds, winter and summer ranges).
 - b. Develop and implement a WACH management plan.
- G2. To provide a harvest consistent with the customs, traditions and spiritual needs of all consumptive users.*
- a. Explore opportunities for tribal self-regulation.
- G3. To involve federally recognized tribes, State and Federal agencies and all other users in making recommendations for research, monitoring, regulation, allocation and enforcement.*
- a. Establish communication with the reindeer industry, guides, transporters and other aircraft operators to minimize conflict.
- G4. To respect indigenous, traditional and scientific knowledge and integrate them into management decisions.*

G5. To emphasize indigenous, traditional and scientific education and foster communication among all caribou users.

- a. Provide information and educational materials concerning the WACH and this charter to users, schools, communities, agencies and media services.

IV. Relationship to other organizations

The Working Group is not intended to function primarily as a political or lobbying institution. Nor is the Working Group intended to replace fish and game regulatory bodies such as the Alaska Board of Game and the Federal Subsistence Board.

The Working Group sees itself as a body that brings together all of the knowledge and concerns that people have in northwestern Alaska concerning the care and management of the Western Arctic Caribou Herd. It is a holistic approach intended to inform and educate all caribou users and to assist regulatory bodies with their work. Specifically this group collaborates and works cooperatively with all existing institutions including boroughs, land owners, regional, state, and federal subsistence advisory bodies to achieve consensus on care and management of the WACH.

*Drafted by Ken Adkisson, Earl Kingik, Dave Spirtes, John Trent and Pius Washington with assistance from Caleb Pungowiyi on June 27 at Kotzebue. The draft charter was subsequently modified and approved by consensus of the Working Group at Anaktuvuk Pass on August 2, 2000.

###

BYLAWS

FOR THE WESTERN ARCTIC CARIBOU HERD WORKING GROUP*

ARTICLE I. Name

The name of this organization is the Western Arctic Caribou Herd Working Group (Working Group).

ARTICLE II. Membership

Membership in the Working Group consists of representatives of stakeholders with a direct interest in the care and management of the WACH. The number of stakeholders in the Working Group is determined by the Working Group itself. Each stakeholder representative, however, is selected by his own constituency and serves at the pleasure of that constituency. In the event that a stakeholder representative cannot attend a function of the Working Group, there shall be a designated alternate representative.

A quorum of the Working Group will consist of greater than fifty percent (50%) of the existing Voting Chairs.

ARTICLE III. Voting

Each member in the Working Group has one vote. However the preferred method of decision making is by consensus process.

In the event that consensus cannot be reached on an issue, voting by majority will carry the issue. A minority report will also be recorded in the minutes of the meeting.

ARTICLE IV. Officers

Officers in the Working Group shall be a Chair and Vice-chair elected by the membership. Each shall serve a staggered three year term. In the event an officer cannot complete a term, a replacement will be elected by the Working Group.

ARTICLE V. Duties of Officers

The duties of the Chair shall consist of chairing meetings; representing the Working Group to other organizations, the public and the media; appointing special committees; consulting with and directing the resource agencies; and other duties consistent with the purpose and goals of the Working Group.

The duties of the Vice-chair are to assist the Chair and to fill in for the Chair when absent.

ARTICLE VI. Meetings

The Chair will convene two meetings per calendar year. Meeting locations will be rotated. Meetings will follow procedures described in Roberts Rules of Order.

ARTICLE VII. Relationship of resource management agencies to the Working Group

Resource agencies consist at this time of the USFWS, BLM, NPS, BIA, and ADF&G. Other agencies may join at a later date. Resource agencies serve as staff to the Working Group in a non-voting capacity. An agency representative will work closely with the Working Group Chair to provide professional services and support to the Working Group.

ARTICLE VIII. Funding

The resource agencies will work with the Working Group Chair to secure adequate long-term funding to support activities of the Working Group.

ARTICLE IX. Executive Committee

The Working Group shall establish an Executive Committee to make decisions when the Working Group is not in session. The voting members of the Executive Committee shall consist of the Chair, Vice Chair, and three additional Working Group voting chairs representing diversity on the Working Group. A quorum of the Executive Committee will consist of three voting members. Non-voting members on the Executive Committee will be the Working Group Coordinator and the Working Group Agency Representative. *(Article IX adopted by unanimous vote on May 4, 2004, Girdwood, Alaska. Amended to establish a quorum for the Executive Committee by unanimous vote on December 17, 2015.)*

**Drafted by Ken Adkisson, Joseph Ballot, Earl Kingik, Dave Spirtes, John Trent and Pius Washington with assistance from Caleb Pungowiyi June 27, 2000 at Kotzebue. The draft was subsequently modified and approved by consensus of the Working Group at Anaktuvuk Pass August 2, 2000. Bylaws amended on May 4, 2004 and December 17, 2015.*

#

MEMORANDUM OF UNDERSTANDING

among

THE UNITED STATES DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Alaska
U.S. Fish and Wildlife Service (USFWS)- Alaska Region
National Park Service (NPS) Alaska Region

And

THE STATE OF ALASKA
Department of Fish and Game (ADF&G)

concerning

**The Western Arctic Caribou Working Group
and
Western Arctic Caribou Herd Cooperative Management Plan**

Purpose. The purpose of this agreement is to provide inter-agency support for the cooperative management of the Western Arctic Caribou Herd and its habitat by the U.S. Department of Interior, Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (USFWS) and National Park Service (NPS), and the State of Alaska, Department of Fish and Game (ADF&G). The signatory parties propose to work together within the scope of their respective authorities toward maintaining a sustainable, healthy ecosystem that supports a healthy and vibrant Western Arctic caribou herd throughout its range in northern and western Alaska.

- I. Objectives. This MOU sets forth general terms, conditions and criteria under which the four parties will cooperatively manage the Western Arctic Caribou herd and its habitat with the following objectives.
 - A. Develop stable, long-term funding to support the Western Arctic Caribou Working Group (Working Group) and implement actions outlined in the Western Arctic Caribou Herd Cooperative Management Plan (Cooperative Management Plan).
 - B. Work together to ensure the long-term conservation of the Western Arctic caribou herd and the ecosystem on which it depends.
- II. Authorities.

- A. BLM enters into this MOU under the authority provided in the Federal Land Policy and Management Act of 1976 (FLPMA), the Alaska National Interest Lands Conservation Act (ANILCA) and the Code of Federal Regulations, Title 43, Chapter II.
 - B. ADF&G enters into this MOU under the authority provided in Article VIII of the Constitution of the State of Alaska, Section 16 of the Alaska Statutes, and Title 5 of the Alaska Administrative Code.
 - C. NPS enters into this MOU under the authority provided in 16 USC Sections 1,2, and 3.
 - D. USFWS enters into this MOU under the authority provided in Fish and Wildlife Coordination Act, 16 USC 661 to 666C.
- IV. Responsibilities and Procedures. According to both Federal statutory law and regulation, and State statutory law and regulation, the four parties signatory to this MOU are authorized to manage wildlife populations and/or manage wildlife habitat as outlined in the Cooperative Plan. The parties agree that the agencies signatory to this MOU shall support the continued maintenance of the Working Group and implementation of the Cooperative Management Plan. These actions will be advantageous to all parties involved in terms of improved coordination of management and research efforts, cost sharing, reduce duplicity of effort, and increased opportunity for public involvement in managing the herd and its habitat
- A. Each agency agrees to the following:
 - 1. Seek funding to support the Working Group consistent with the agency's authority. Any transfer or sharing of funds will be done through more specific Cooperative Agreements consistent with each party's respective authorities.
 - 2. Assist in implementing the Western Arctic Caribou Herd Cooperative Management Plan, focusing their individual efforts on management actions consistent with their respective mandates and authorities.
 - 3. Give other agencies opportunities to provide input on issues of mutual concern.
 - 4. Share information pertaining to habitat assessment, caribou population status, future and proposed development, and other relevant information with the other parties.
 - B. The parties will meet annually to review information reflecting on herd and habitat status plan and coordinate management activities, and prepare a brief annual status report, including recommendations, to the Working Group as described in the 2003 Western Arctic Herd Cooperative Management Plan.
 - C. All parties understand that this agreement shall not create any contractual obligations, or impose any financial obligation by one upon the other.
 - 1. Each party accepts responsibility for its own costs resulting from participating in this agreement.
 - 2. In accordance with Bureau policy, this instrument (MOU) excludes any obligations or exchange of Federal funds.

V. Administration.

- A. Nothing in this MOU will be construed as affecting the authorities of the participants. Nothing will be construed as binding beyond the participants respective authorities, or to require participants to obligate or expend funds in excess of available appropriations.
- B. This MOU in no way restricts the participants from participating in similar activities or arrangements with other public or private agencies, organizations, or individuals.
- C. Conflicts between participants that cannot be resolved at the operational level (as a result of covenants stated in *IV. Responsibilities and Procedures*) will be referred to successively higher levels for resolution.
- D. Participants will review this agreement at least every five years to determine its adequacy, effectiveness and continuing need.
- E. Terms of this MOU may be renegotiated at any time following at least 30 days notice to the other participants.
- F. This MOU shall become effective when signed by all parties. The MOU shall continue until written termination by mutual agreement, or by any party giving 30 days prior written notice to the other parties.
- G. The points of contact for the signatory Agencies will be as follows:

The point of contact for ADF&G will be Management Coordinator, Region 5, Division of Wildlife Conservation.

The point of contact for the FWS will be the Refuge Manager of the Selawik National Wildlife Refuge.

The point of contact for the NPS will be the Superintendent for the Western Arctic National Park Lands.

The point of contact for the BLM will be Field Manager-BLM Central Yukon Field Office.

APPROVED:



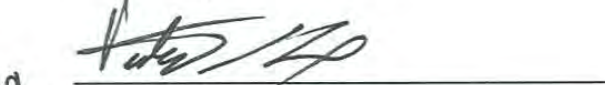
Denby S. Lloyd
Commissioner
Alaska Department of Fish and Game
State of Alaska

13 July 09
Date



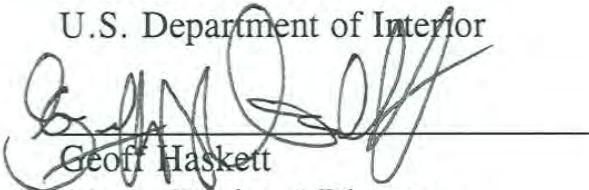
Thomas P. Lonnie
Alaska State Director
Bureau of Land Management
U.S. Department of Interior

9-17-09
Date



Sue Masica, Director
Alaska Region
National Park Service
U.S. Department of Interior

8/19/09
Date



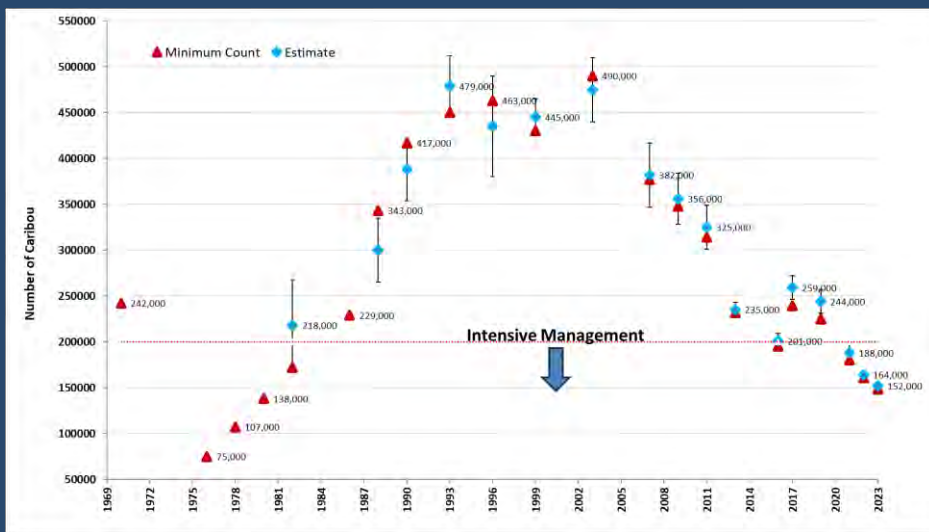
Geoff Haskett
Alaska Regional Director
U.S. Fish and Wildlife Service
U.S. Department of Interior

7/21/09
Date

WAH Caribou Update

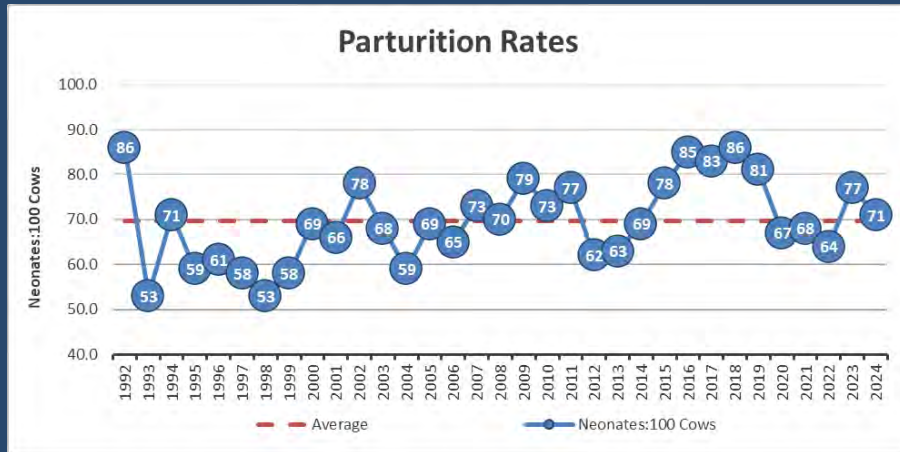


WAH Abundance Over Time



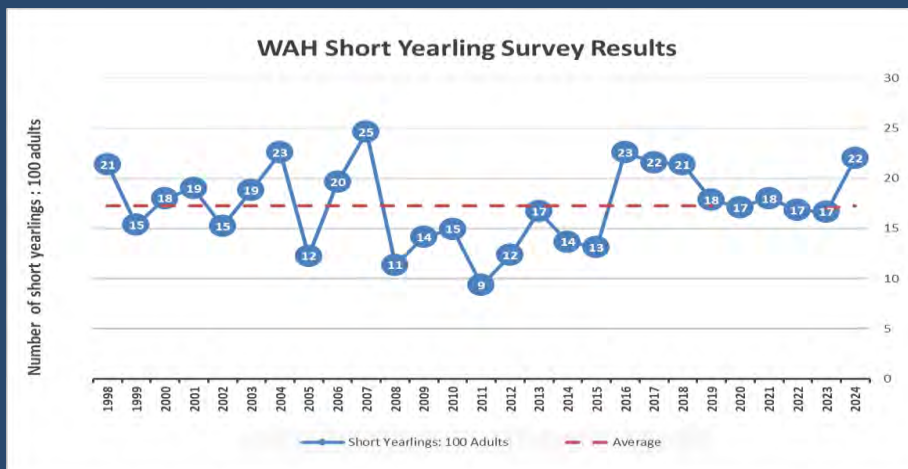
Calving

- Parturition - 71% (2024)
- Long-term average (70%)

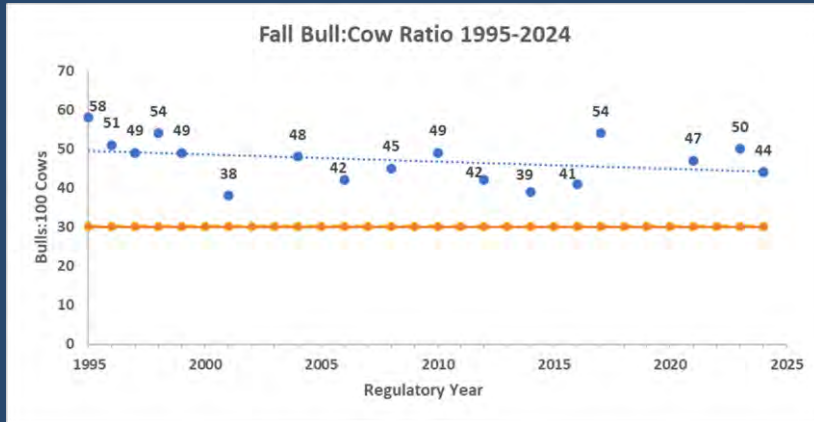


Recruitment

- Short Yearling Recruitment = 22:100 adults(above average)
- Long term average = 17

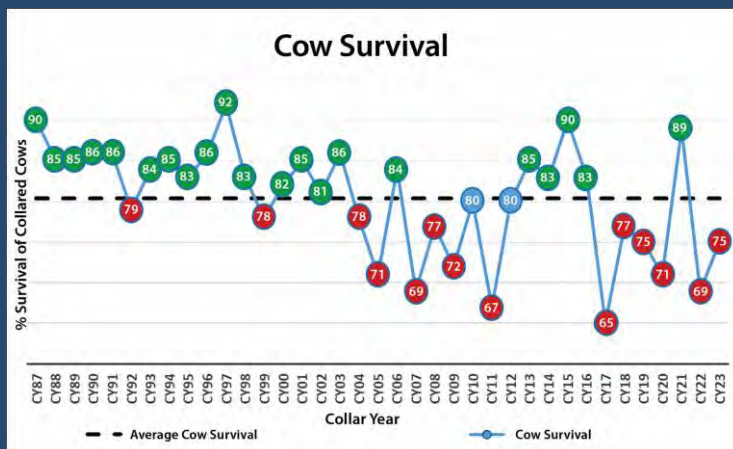


Fall Composition



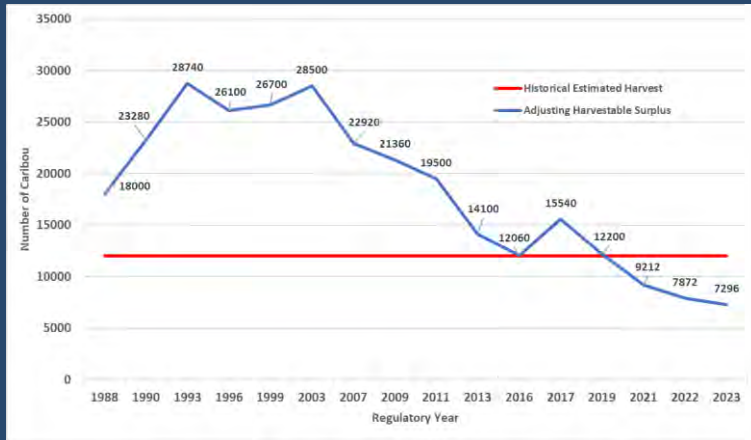
Adult Survival

- Adult Female Survival – 75% (below average)
- Long term average = 80%



Limiting Cow Harvest

- IM Objective of at least 200,000
 - Harvest Objective 12,000-20,000
- WAH and TCH combined ANS of 8,000-12,000
- Harvestable surplus is approximately 7300; with no more than 1% or fewer of the available cows (~750)



Why cows matter

Cow Caribou Reproductive Potential



Board of Game Actions

Bag Limit changed in GMUs 22, 23, and SW 26A

- Bag limit is now: 15 caribou per year only 1 of which may be a cow

Nonresident harvest in GMU 23

- Changed from general harvest ticket to Drawing tag
- Up to 300 permits issued (1 bull)

Increased bear harvest opportunity

- Year-round resident brown bear harvest in GMU 23
- Nonresident limit increased to 2 bears a year

Recommendation

Management Level	Population Trend		
	Declining Adult Cow Survival <80% Calf Recruitment <15:100	Stable Adult Cow Survival 80%-88% Calf Recruitment 15-22:100	Increasing Adult Cow Survival >88% Calf Recruitment >22:100
Liberal	Pop: 265,000+ Harvest: 14,000+	Pop: 230,000+ Harvest: 14,000+	Pop: 200,000+ Harvest: 14,000+
Conservative	Pop: 200,000-265,000 Harvest: 10,000-14,000	Pop: 170,000-230,000 Harvest: 10,000-14,000	Pop: 150,000-200,000 Harvest: 10,000-14,000
Preservative	Pop: 130,000-200,000 Harvest: 6,000-10,000	Pop: 115,000-170,000 Harvest: 6,000-10,000	Pop: 100,000-150,000 Harvest: 6,000-10,000
Critical	Pop: <130,000 Harvest: <6,000	Pop: <115,000 Harvest: <6,000	Pop: <100,000 Harvest: <6,000

How to help

- ✓ Report caribou harvest through RC907
- ✓ Reduce the harvest of cows

[Alex Hansen](#)
[Alaska Department](#)
[of Fish & Game](#)

Let cows live.



Cows produce calves.
Their calves grow into
adults and produce
more calves.



Summary

- The continued decline of the WAH is likely until cow survival improves
- Limiting cow harvest is the biggest step we can take to help the WAH recover
- Bag limits allow for 1 cow per hunter but for each cow we take we can potentially have 53 less caribou in 12 years

WAH Health Stats

Population Size:	152,000
Population Trend:	Declining
Calving Rate:	71%
Calf Recruitment:	22 calves:100 adults
Cow Survival Rate:	75%
Bull-to-Cow Ratio:	50 bulls:100 cows

Green = Above long-term average

Red = Cause for concern



Questions?



Alex Hansen
Alaska Department
of Fish & Game
Kotzebue

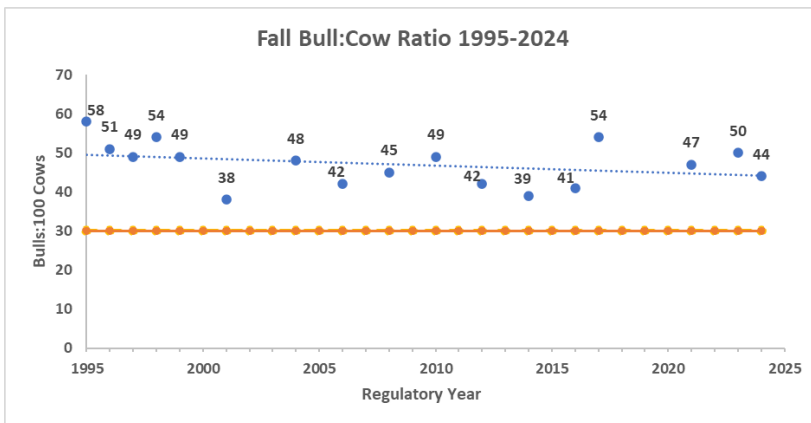
Photo by Jim Dau

Bull to Cow Ratios in the WAH

Alex Hansen
Alaska Dept. of Fish and Game
Kotzebue



Fall Composition

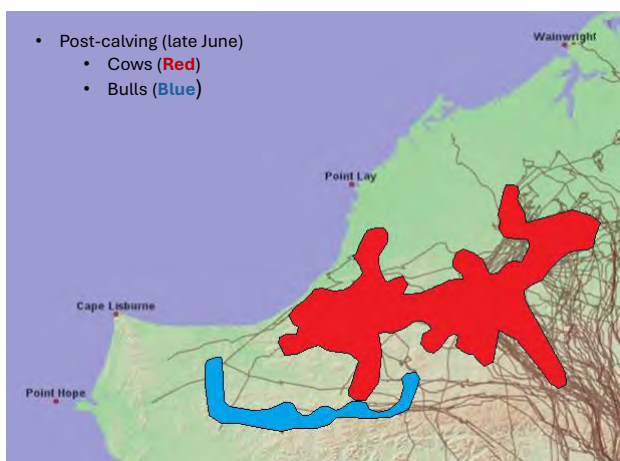


- WG Plan recommends 30bulls:100cows
- Biological concern is much lower than 30:100

Role of Bulls in the Herd

- Spring migration generally occurs later for bulls who proceed more directly to the insect relief area while cows are on the calving grounds
- Bulls are mixed with females and calves leaving insect relief areas then segregate to some extent until the rut
- During the winter months bulls often form bachelor groups near the main groups of cows and calves
- In simple terms mature bulls prepare for the rut during the summer, breed during the rut, then recover and repeat during their peak years until they age out and or die

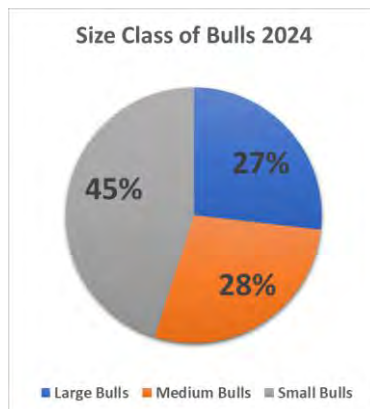
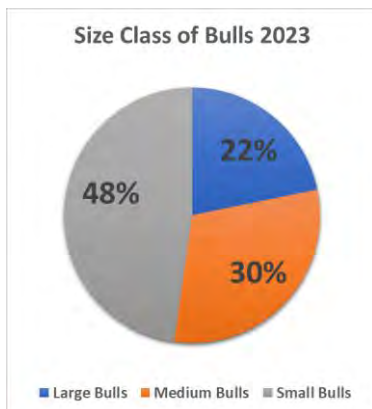
Different Places, Different Priorities



- Bulls focus on finding high quality forage and are willing to take more risks to build reserves
- Cows are more cautious often choosing more protected areas for themselves and their calves
- This can lead to bulls being separated from cows and calves even when they are in the same general area



WAH Bull Size Composition



- 2181 bulls were classified in 2023
- 1439 bulls were classified in 2024

Size Categories



- Small bulls were characterized by small body size and antlers that reflected immaturity



- Medium bulls were characterized by full mature body size and antlers that reflected maturity

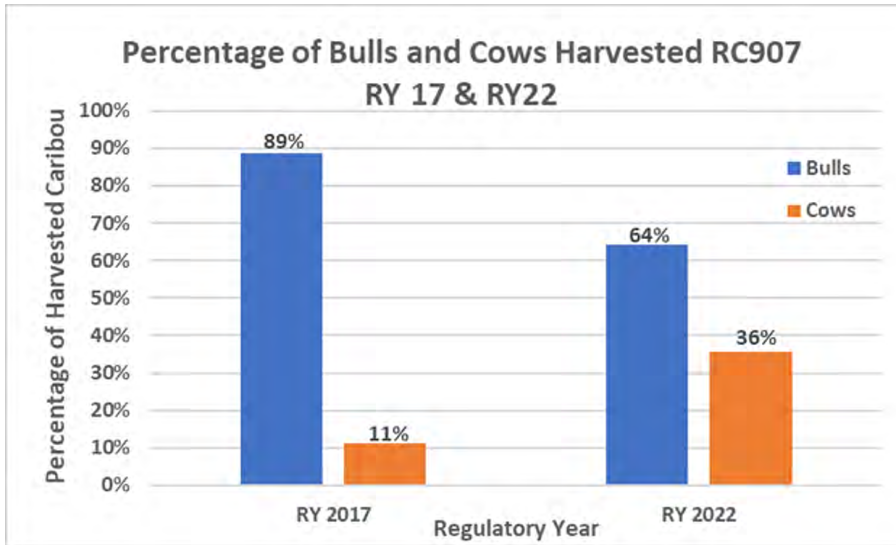


- Large bulls were characterized by large body size and antlers that reflected animals in their prime

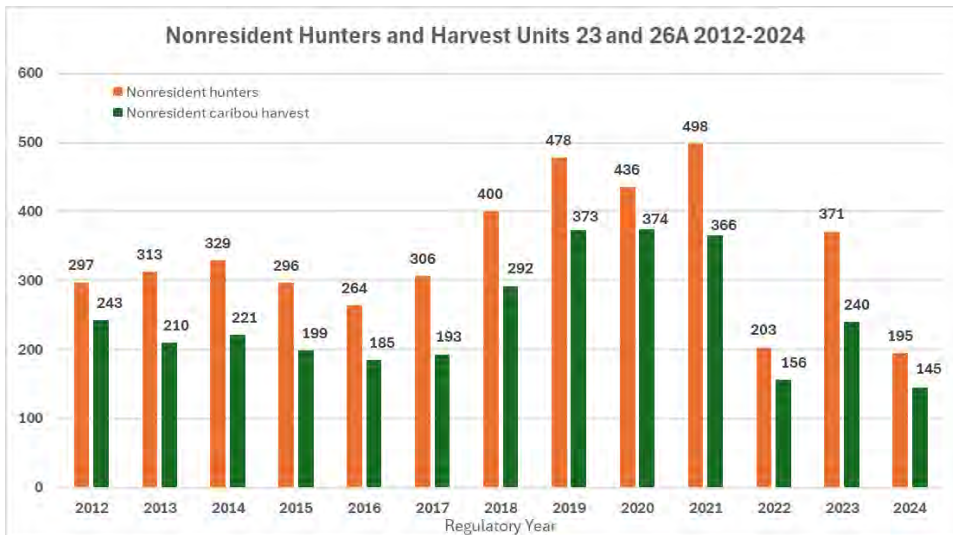
Size composition Comparison

- If we assume the population to be around 150,000 and the proportions are approximately 50% cows, 25% calves and 25% bulls
- Cows make up the bulk of the population at ~ 50% giving us around 75,000 cows
- Calves represent ~ 25% of the WAH for approximately 37,500 calves
- Bulls round out the remaining ~ 25% giving us ~ 37,500 bulls
 - Roughly 25% of all the bulls are considered “large bulls” giving us an estimate of 9,375 large bulls, give or take
- During the fall most hunters attempt to harvest large bulls, harvest composition can vary annually

Sex Ratios of Harvest Vary

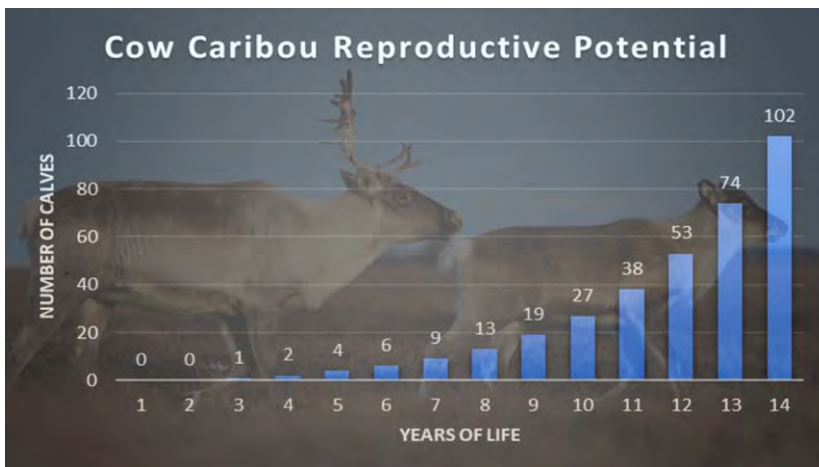


Nonresident Bull Harvest





Cows Lead the Way!



- In general, mature cows lead migrations and bulls follow
- Unlike bulls, the loss of reproductive potential from one cow cannot be compensated for by other cows

Discussion...

Bull to Cow Ratios in the WAH

Alex Hansen
Alaska Dept. of Fish and Game
Kotzebue





Western Arctic Herd Working Group

National Park Service Caribou Monitoring

September 2023 – August 2024

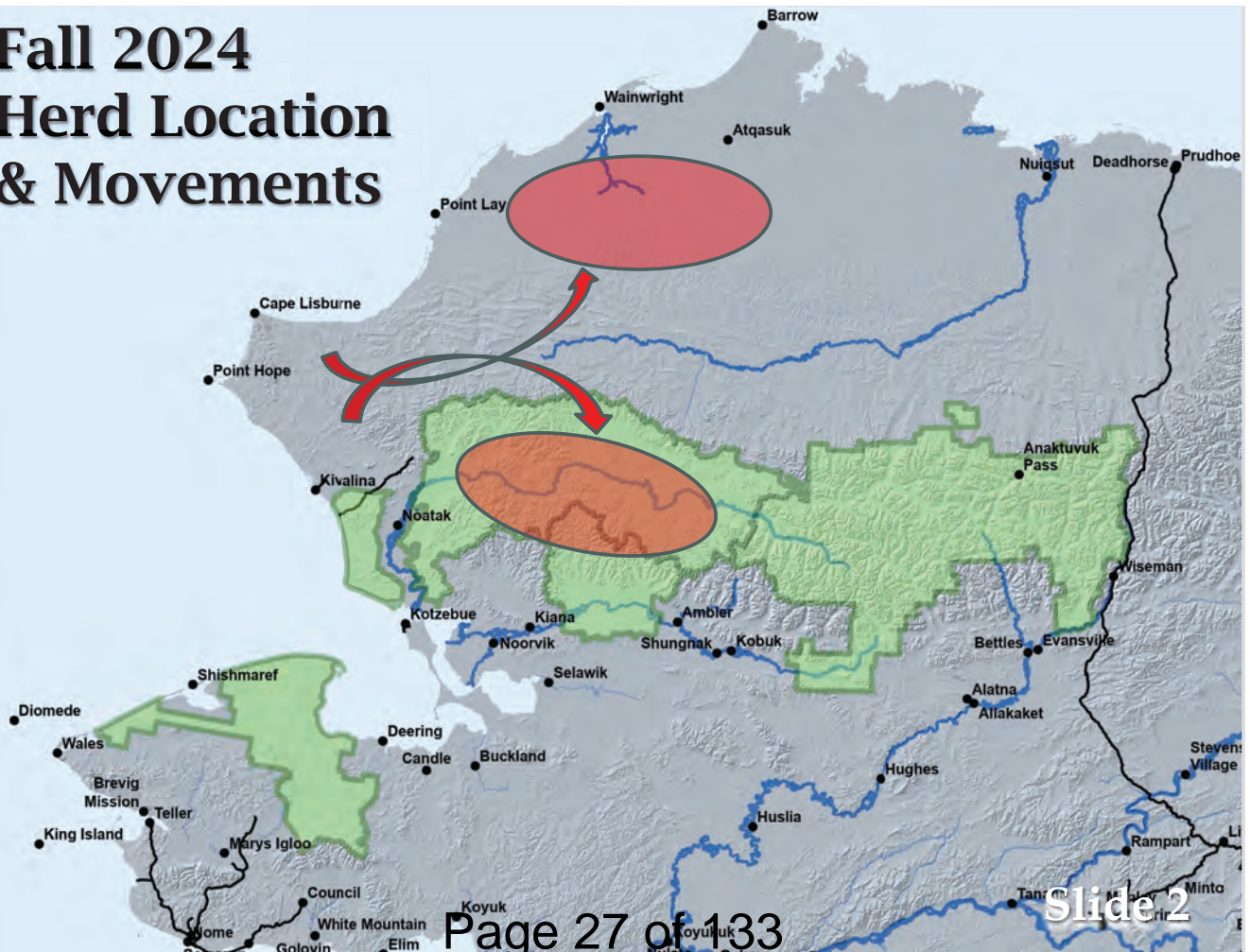
December 2024



Kyle Joly and Matt Cameron

Slide 1

Fall 2024 Herd Location & Movements



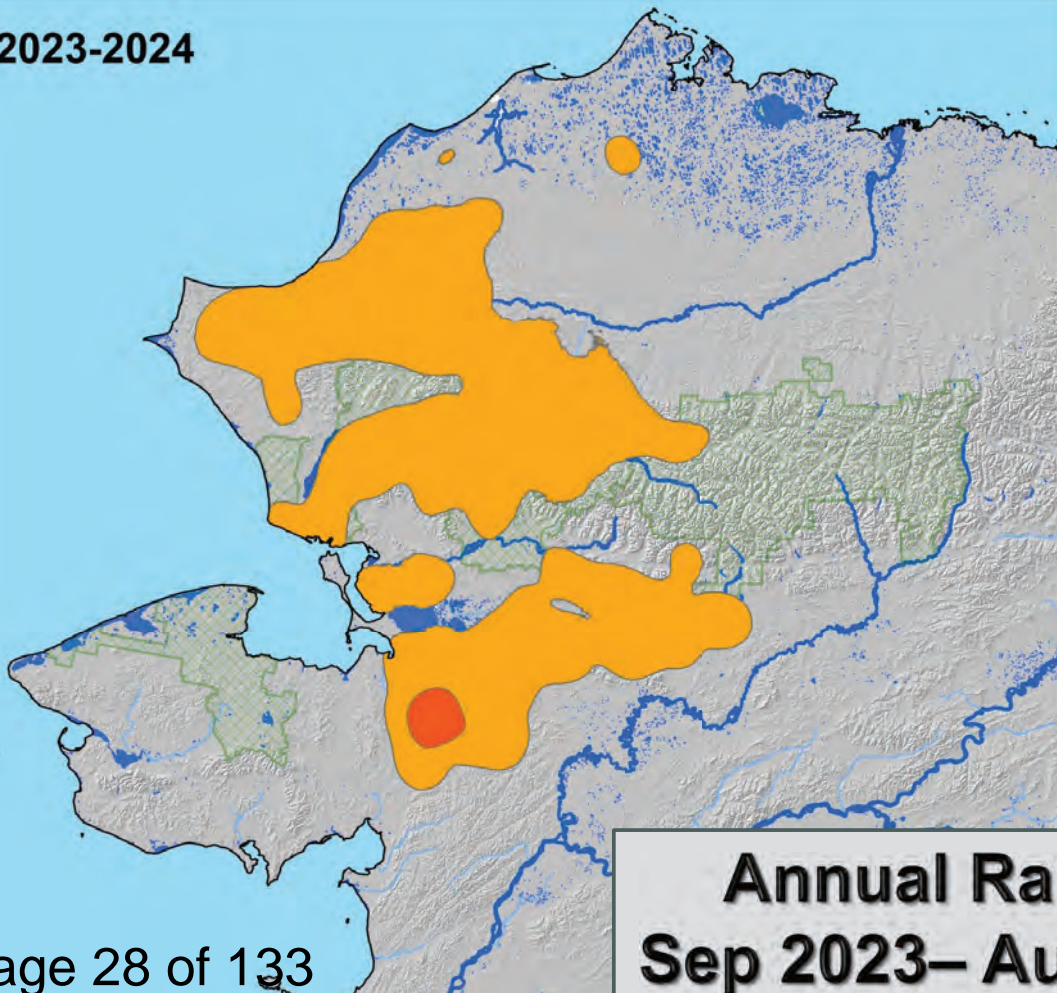
WAH Collar Results

Sep 2023 – Aug 2024

- 46 GPS Collars deployed
 - All via netting, April 2024
- Fall Park Use
 - 72% in Kobuk Valley, record high
- Overwinter Park Use
 - 0% Bering Land Bridge, 16% Gates of the Arctic
- Distance traveled
 - Mean = 2282 miles, about average

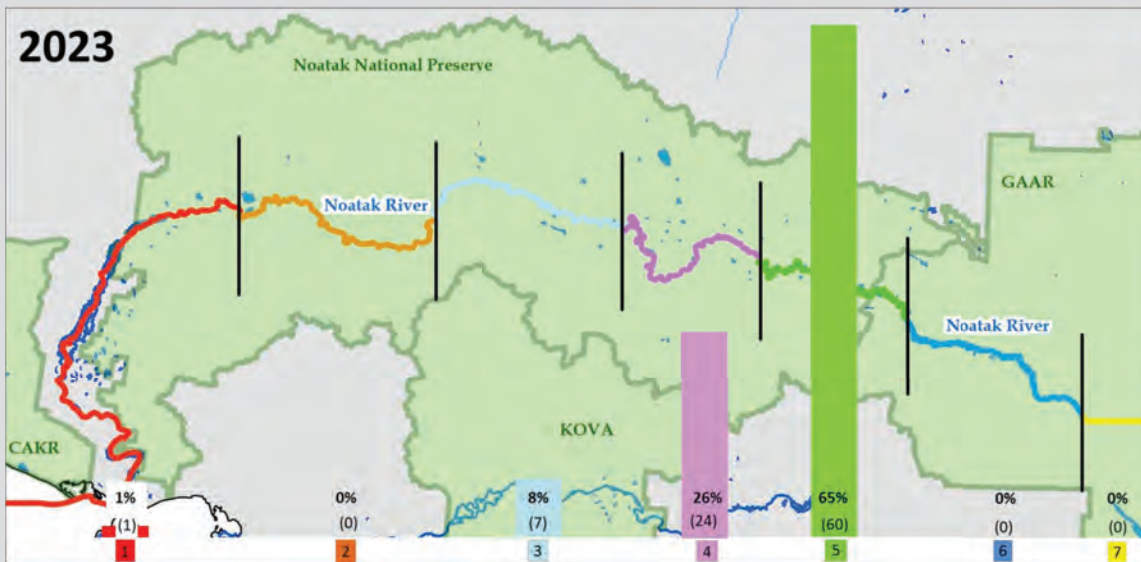
Slide 3

2023-2024



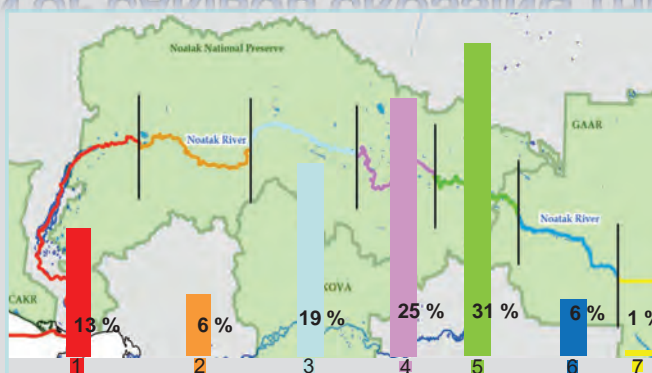
Slide 4

Annual Range:
Sep 2023 – Aug 2024



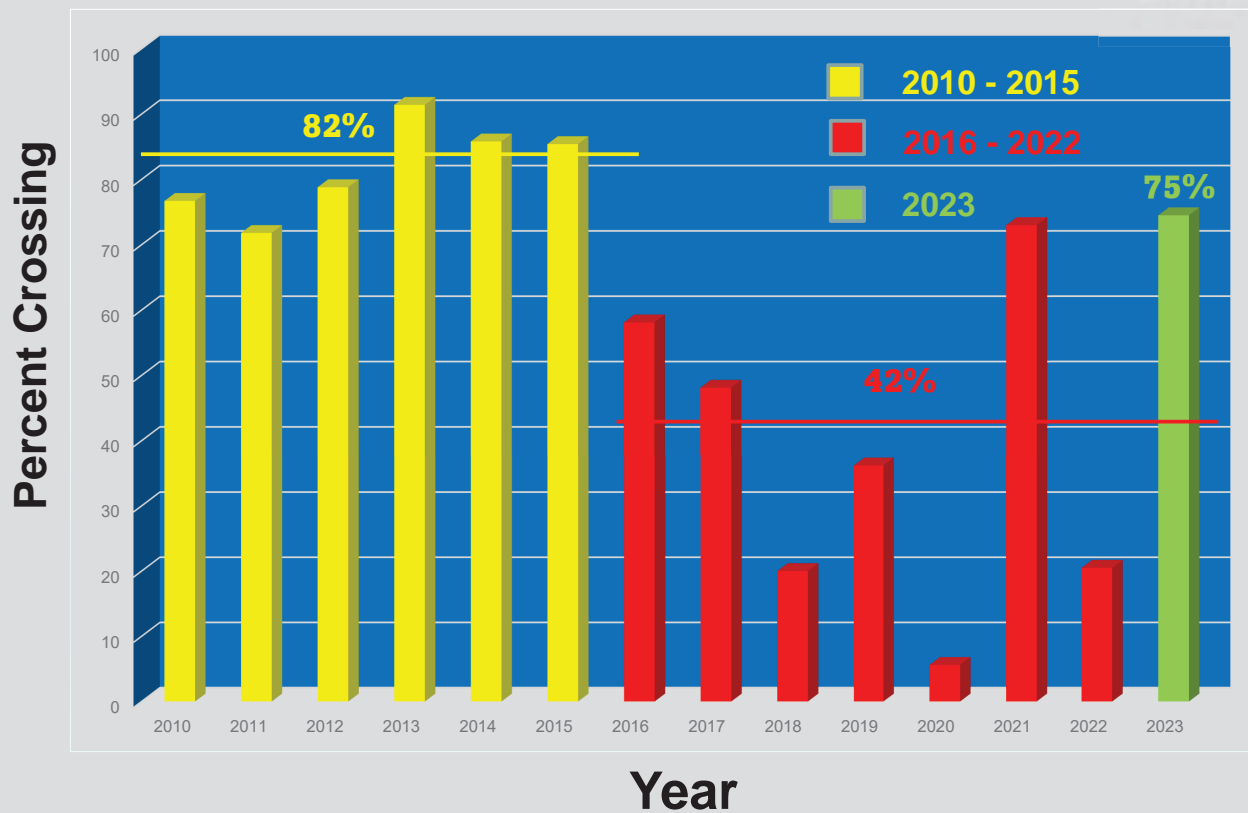
DISTRIBUTION OF CARIBOU CROSSING THE NOATAK RIVER

2010-2016
Average

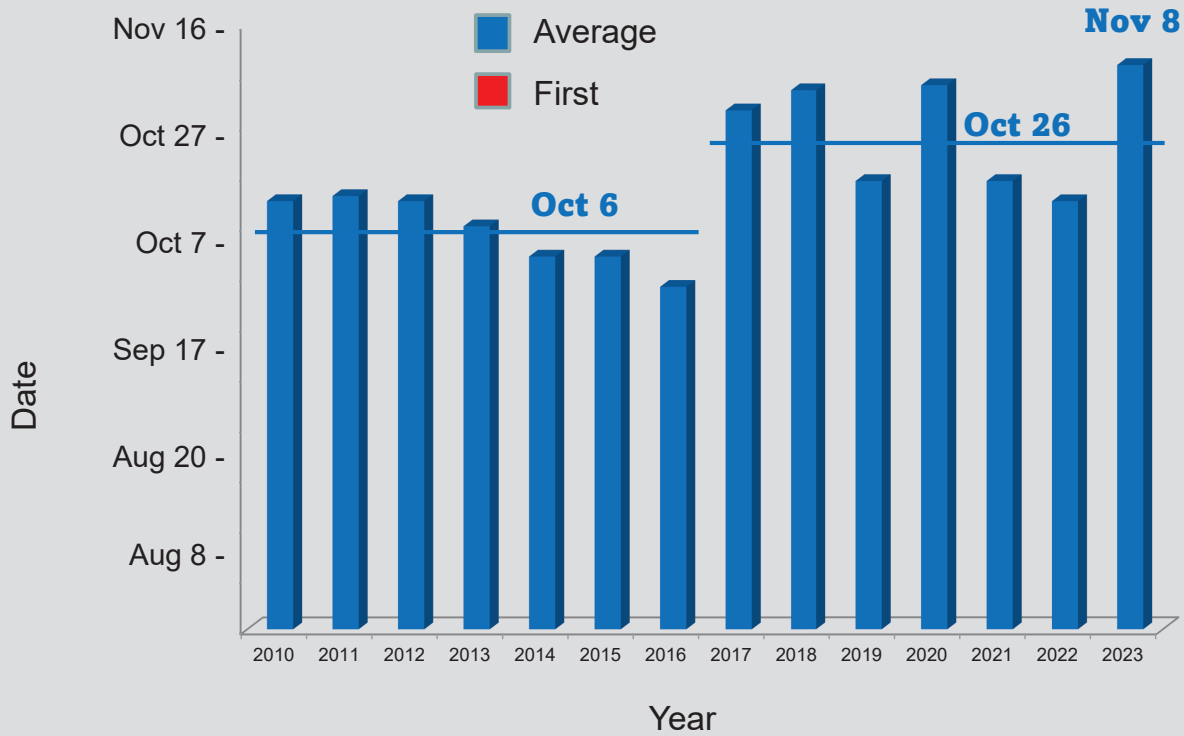


Slide 5

Slide 6

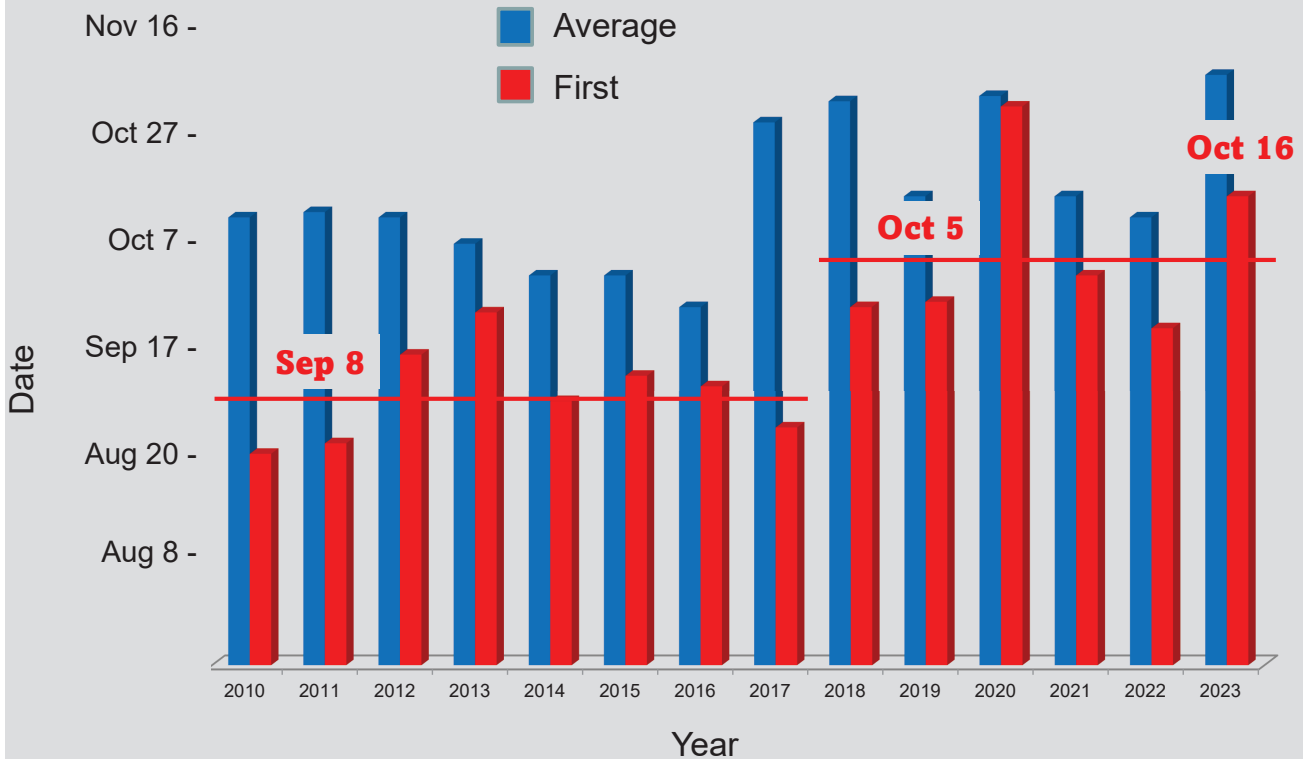


Fall Migration - Kobuk Crossing



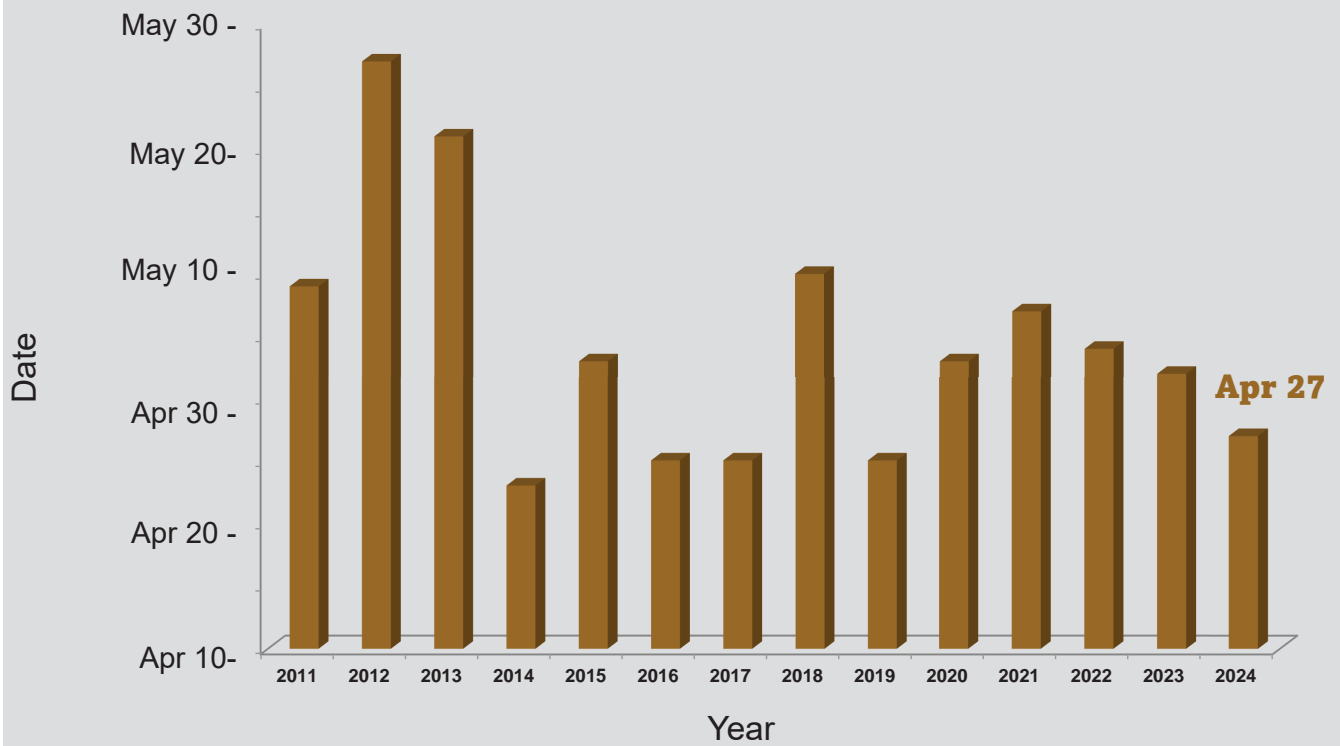
Fall Migration – Timing of Kobuk Crossing

Slide 7



Fall Migration – Timing of Kobuk Crossing

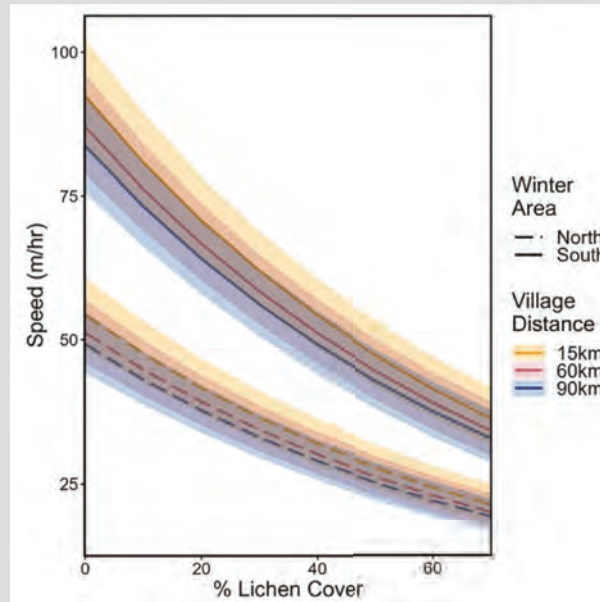
Slide 8



Spring Migration Selawik Crossing

Slide 9

“Behavioral adaptation to seasonal resource scarcity by Caribou (*Rangifer tarandus*) and its role in partial migration”

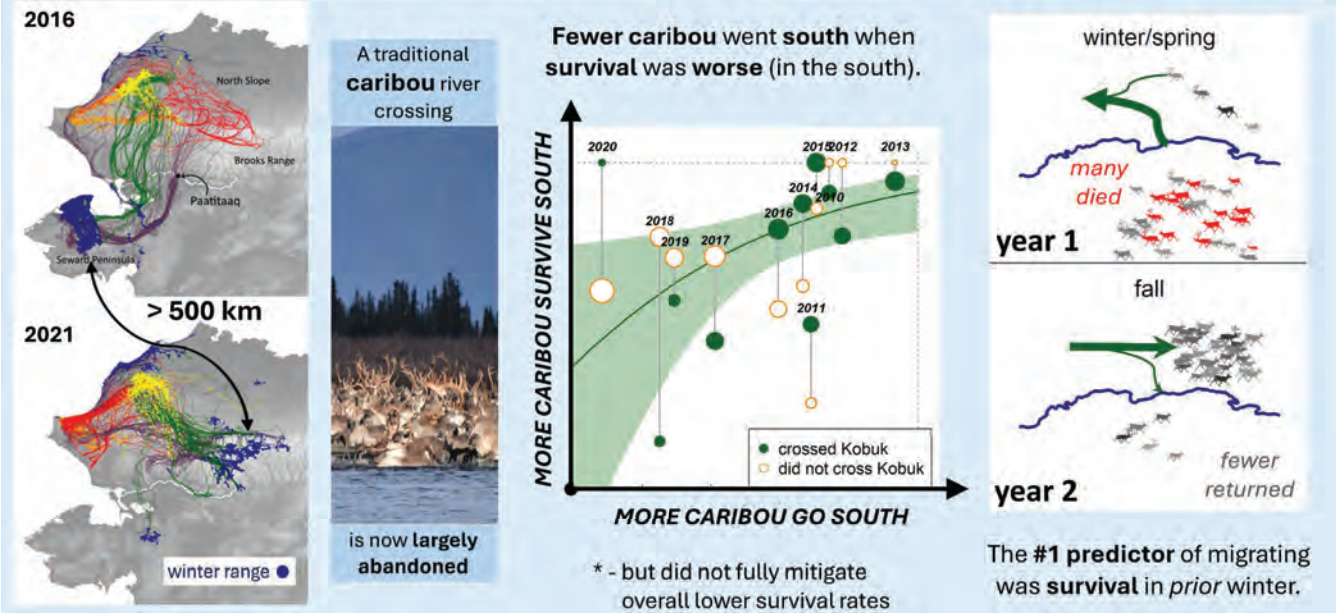


Slide 10

- Migratory caribou moved 2x as much as non-migratory caribou during winter
- Migratory caribou found 2.5x more lichens than non-migratory caribou
- Non-migratory caribou saved about 10% of their energy by moving less
- All caribou slowed down when they encountered more lichens

“Evidence for an adaptive, large-scale range shift in a long-distance terrestrial migrant”

A MAJOR RANGE SHIFT was ADAPTIVE* and DRIVEN BY MEMORY



- WAH caribou have shifted winter ranges
- Survival is lower in recent years
- Survival would have been lower if the shift didn't happen
- Less caribou migrated south if survival was low the previous year

Slide 11

“How Wildlife are Responding to a Warming Climate”



- Review article looking at many species including caribou, wolves, bears & more
- Changing temperature, precipitation, and fire regimes can impact caribou
- Icing events can be very difficult on caribou and other species
- Public version: <https://www.nps.gov/articles/000/aps-22-1-5.htm>

Questions?

kyle_joly@nps.gov

<https://www.nps.gov/im/arcn/caribou.htm>

2024 WACH WG Technical Committee Report

The Technical Committee (TC) met on December 10, 2024, to discuss scientific and technical issues related to conservation and management of the Western Arctic Caribou Herd (WACH). The following are meeting highlights and TC recommendations for consideration by the WACH Working Group at its December 11-12, 2024 meeting. The 2024 TC agenda and presentations can be found online at www.westernarcticcaribou.net.

1. **Western Arctic Caribou Herd (WACH) Population Status and Recommended Management Status**

The 2019 WACH Cooperative Management Plan (p. 21) asks the TC to “*evaluate the status of the herd and develop recommendations on herd management level for the Working Group*”, based on Table 1 in the plan. On December 12, the TC discussed the following regarding herd status:

- Due to the location of the herd and weather conditions the 2024 photo census was not able to be completed.
- Based on all indicators, biologists believe that the number of caribou is likely very similar to last year’s number of 152,000 animals. Likely lower, but not below 130,000.
- Adult cow survival was 75% in 2023. This is up from 69% in census year 2022, down from 89% in 2021, and 71% in 2020. This is below the average of 80%.
- Other demographic indicators for the herd: calf recruitment is above the long-term average (22:100 adults) and calf parturition is 71%, above the long-term average (70%).
- The most recent fall herd composition survey in 2024 shows 44 bulls:100 cows.

The TC recommends that the WACH be considered to be within the “Preservative” and “Declining” management category, with regard to Table 1 of the WACH Cooperative Management Plan (p. 21 of the 2019 plan).

Research Presentations related to WACH

Researchers presented the following presentations to the TC. The presentation contents can be found online at www.westernarcticcaribou.net.

- **Results about Caribou Diets from Camera Collars** – Heather Johnson, Ph.D., Research Wildlife Biologist, United States Geological Survey
- **Vegetation, Climate Change, and Caribou** – Dr. Patrick Sullivan, University of Alaska Anchorage; Roman Dial, Ph.D. Alaska Pacific University
- **Research Paper Presentation – Two Papers** (1) How Western Arctic Herd Survival Patterns Influence Migration Patterns and (2) Differences between Migrant and Non-migrant Caribou During Winter - Kyle Joly, NPS

2. **WACH Research and Management Projects and Bibliography**

At the request of the Working Group, the TC maintains a list of research and management projects related to the WACH and a bibliography of publications regarding the herd. These lists will be updated in January 2025 and posted to the WACH WG website.

2. POPULATION MANAGEMENT

The Working Group recognizes population management as a critical element for continued conservation of the Western Arctic Caribou Herd. Herd size and trend will change over time. At low population levels, management must conserve the herd and protect subsistence priority and uses, according to applicable federal and state regulations. At high population levels, management must consider density-based impacts to the herd and its range. Thus, management strategies must be responsive to changing conditions.

In general, population size, population trend (stable, increasing or decreasing), adult cow survival, and calf recruitment are the major factors considered when determining management actions and harvest scenarios for the herd's long-term conservation. As herd condition declines, the frequency or levels of management actions will be increased to better monitor the herd. Available harvest (harvestable surplus) will be based on estimated population size, trend, and herd condition. When estimates of available harvest drop below average range-wide harvests or the amount necessary for subsistence (about 8,000 to 12,000 caribou), restrictive harvest strategies become important to optimize available harvest among users and conserve the herd.



Western Arctic caribou on a frosty October day.
Photo: NPS/K. Joly

This plan prescribes ranked, color-coded management levels for differing population sizes and trends of the Western Arctic Caribou Herd (Table 1). Harvest levels applicable to declining, stable and increasing populations are used to estimate the available harvest associated with each herd condition. Under “Liberal” management (green), few harvest restrictions will exist. With “Conservative” management (orange), harvest will be more limited and biological monitoring will intensify. “Preservative” management (yellow) will prompt increased restrictions

where harvest may be limited to subsistence use only and biological monitoring of the herd will be maximized. Under “Critical” management (red), harvest will be highly restricted, habitat and/or population restoration efforts may be enacted, and maximum biological monitoring of the herd will be maintained.

Table 1 provides a guide to herd management level determined by population size, trend, cow survival, and calf recruitment. Population sizes guiding management level determinations are based on recent (since 1970) historical data for the Western Arctic Caribou Herd.

TABLE 1. Western Arctic Caribou Herd management levels using herd size, population trend, and harvest range.*

Management Level	Population Trend		
	Declining Adult Cow Survival <80% Calf Recruitment <15:100	Stable Adult Cow Survival 80%-88% Calf Recruitment 15-22:100	Increasing Adult Cow Survival >88% Calf Recruitment >22:100
Liberal	Pop: 265,000+ Harvest: 14,000+	Pop: 230,000+ Harvest: 14,000+	Pop: 200,000+ Harvest: 14,000+
Conservative	Pop: 200,000-265,000 Harvest: 10,000-14,000	Pop: 170,000-230,000 Harvest: 10,000-14,000	Pop: 150,000-200,000 Harvest: 10,000-14,000
Preservative	Pop: 130,000-200,000 Harvest: 6,000-10,000	Pop: 115,000-170,000 Harvest: 6,000-10,000	Pop: 100,000-150,000 Harvest: 6,000-10,000
Critical	Pop: <130,000 Harvest: <6,000	Pop: <115,000 Harvest: <6,000	Pop: <100,000 Harvest: <6,000

*Annual harvest has been estimated at around 12,000 caribou per year since 1996.

Each year, or as needed, agency biologists will evaluate the status of the herd in the Technical Committee meeting and develop recommendations on the herd management level for the Working Group. Table 1, which accounts for population size and trend, provides a guide for helping the Working Group determine which management level is appropriate for that year. Adult cow survival (typically < 80% for declining populations and > 88% for increasing populations), calf recruitment (typically < 15 calves: 100 cows for a declining population and > 22 for an increasing population), and other factors such as trends in adult mortality and calf survival, sex and age composition, range condition, caribou health and body condition, and more will provide the basis for the Technical Committee’s evaluation of herd condition and their management level recommendation to bring to the full Working Group for approval.

The Working Group, with assistance from biologists and cooperating agencies, will review the Technical Committee’s recommendations, consider traditional ecological knowledge and knowledge of all users, and seek consensus on the appropriate management strategy to recommend (Figure 12). When management levels change, or there is a need to revise management actions or harvest regulations, the Working Group will develop recommendations for specific actions including regulatory changes. Regulatory proposals will follow the normal state and federal board processes where advisory committees, regional advisory councils, and the public can review and comment on the proposals before board action is taken.

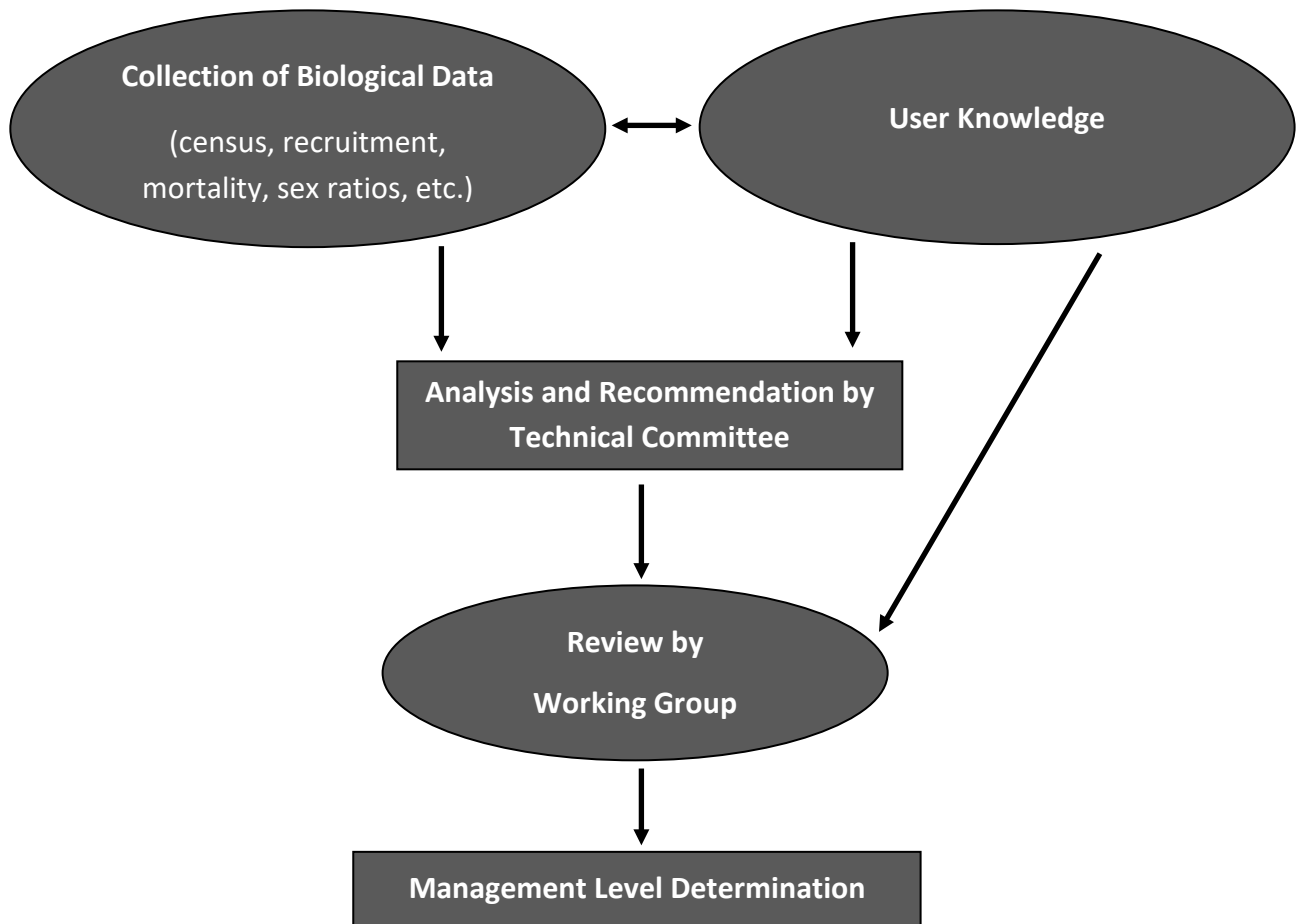


FIGURE 12. Management level decision-making process diagram.

Goal 2: Recognizing that caribou herds naturally fluctuate in numbers, manage for a healthy population using strategies adapted to population levels and trends.

Strategy:

- A. Identify population management level to help guide decisions about management actions and caribou harvest. Four management levels are prescribed, relating to population size and trend (Table 1). The management levels presented in Table 1 should not be viewed as thresholds to trigger specific management actions, but as decision-making guidelines. When specific population conditions do not clearly fall into these categories, a combination of management actions and harvest recommendations outlined in Table 2 may be appropriate.



Summer months typically see the largest caribou groupings, or “aggregations.” Photo: NPS/K. Joly

TABLE 2. Population management actions and potential harvest recommendations.

Liberal Management (Green)**Management actions:**

1. Census the herd every 3 years or more often if major concerns arise.
2. Monitor calf production and survival, adult mortality, and exposure to disease annually.
3. Conduct comprehensive caribou health assessments at least once every 3 years to monitor causes of disease, types and levels of parasites, body condition, and levels of contaminants of concern in caribou tissues.
4. Estimate numbers of male and female caribou harvested annually throughout the range of the herd. Collect harvest information including date taken, residency of hunter, and approximate location of kill.
5. Investigate environmental contaminants as necessary.
6. Conduct thorough and timely investigations of local caribou die-offs.
7. Monitor changes in vegetation and habitat conditions, including winter and summer range, and consider both long term (decades) and short term (seasons) changes.
8. Monitor weather conditions year-round throughout the Western Arctic Caribou Herd range and snow conditions annually at least in Western Arctic Caribou Herd wintering areas.
9. Monitor numbers of wolves and brown bears in selected areas throughout the herd's range.
10. Estimate impacts of proposed development projects on caribou.
11. During increasing population trends, liberalize access, seasons and bag limits.

Caribou harvest recommendations may include:

1. Reduce harvest of bulls by nonresidents to maintain at least 30 bulls:100 cows.
2. No restriction of bull harvest by resident hunters unless bull:cow ratios fall below 30 bulls:100 cows.

TABLE 2. (continued)

Conservative Management (Orange)

Management actions: In addition to those listed under “Liberal Management,” the following management actions will be conducted:

1. Census the herd at least once every 2 years.
2. Monitor sex and age composition every 2-3 years.
3. Conduct comprehensive caribou health assessments at least once every 2 years to monitor causes of disease, types and levels of parasites, body condition, and levels of contaminants of concern in caribou tissues.
4. Intensify efforts to monitor harvests.
5. Increase monitoring of possible environmental contamination as warranted.
6. Intensify monitoring of vegetation, snow and weather conditions and other habitat conditions that may impact caribou throughout their range.
7. Reduce impacts of human activities on caribou where possible.
8. Educate hunters about caribou conservation and the effects of harvesting cows on population size and trend. Additionally, encourage voluntary reduction in cow harvests by residents.
9. Monitor predator populations and, if appropriate, liberalize hunting and trapping regulations.

Caribou harvest recommendations may include:

1. Encourage voluntary reduction in calf harvest, especially when the population is declining.
2. No cow harvest by nonresidents.
3. Restriction of bull harvest by nonresidents.
4. Encourage voluntary reduction in cow harvests by residents.
5. Limit the subsistence harvest of bulls only when necessary to maintain a minimum 30:100 bull:cow ratio.

TABLE 2. (continued)

Preservative Management (Yellow)

Management actions: In addition to those listed under “Conservative Management,” the following management actions will be conducted:

1. Census the herd annually.
2. Monitor calf production and survival, adult mortality, sex and age composition, caribou health, and age structure of the herd to the maximum degree possible.
3. Monitor harvests using permit and quota systems.
4. Maximize monitoring of environmental contamination if concerns exist.
5. Monitor vegetation, snow and weather conditions and other habitat conditions that may impact caribou to the maximum extent possible throughout their range.
6. Mitigate human impacts to caribou.
7. Prevent loss or degradation of seasonal habitat and maximize access to these areas by caribou.

Caribou harvest recommendations may include:

1. No harvest of calves.
2. Limit harvest of cows by resident hunters through permit hunts and/or village quotas.
3. Limit the subsistence harvest of bulls to maintain at least 30 bulls:100 cows.
4. Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary.

TABLE 2. (continued)

<p><u>D. Critical Management (Red)</u></p> <p>Management actions:</p> <ol style="list-style-type: none">1. Intensify all of the management actions listed under “Preservative Management” to the maximum extent possible. <p>Caribou harvest recommendations may include:</p> <ol style="list-style-type: none">1. No harvest of calves.2. Highly restrict the harvest of cows through permit hunts and/or village quotas.3. Limit the subsistence harvest of bulls to maintain at least 30 bulls:100 cows.4. Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary.



Overview of the Alaska Board of Game Regulatory Process

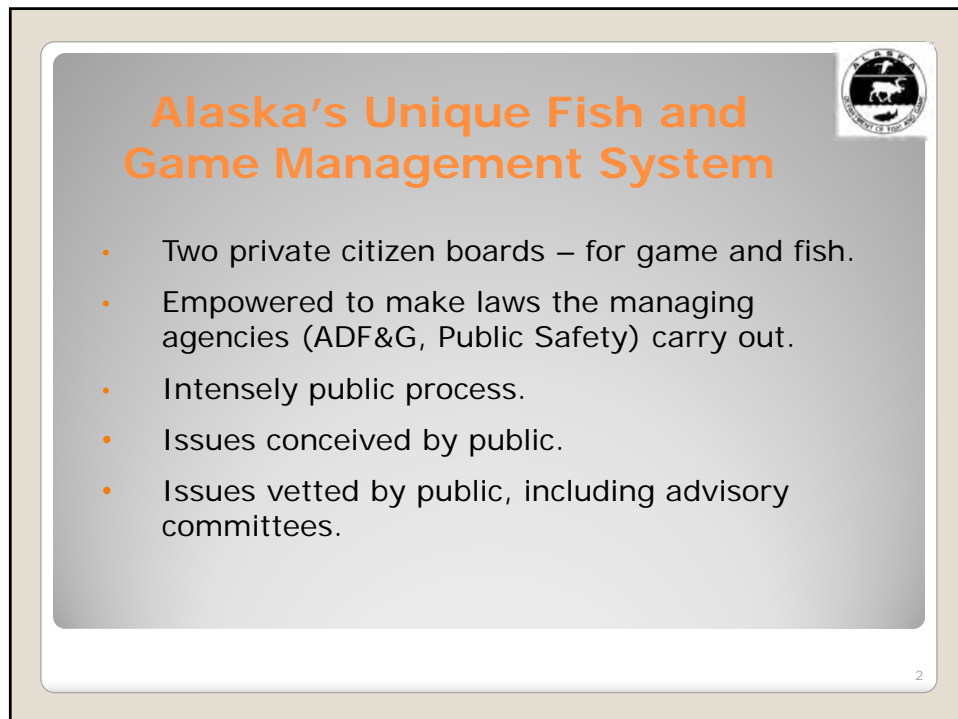
Presented by: Dave Lorring, Member of the Alaska Board of Game to the Western Arctic Caribou Herd Working Group, December 2024

For more information, contact:

Kristy Tibbles, Executive Director, Alaska Board of Game
Boards Support Section, Alaska Dept. Fish and Game
907-465-6098
Email: kristy.tibbles@alaska.gov
<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.main>

1

1




Alaska's Unique Fish and Game Management System

- Two private citizen boards – for game and fish.
- Empowered to make laws the managing agencies (ADF&G, Public Safety) carry out.
- Intensely public process.
- Issues conceived by public.
- Issues vetted by public, including advisory committees.

2

2

Board Composition



The boards are composed of seven members appointed by the Governor, subject to confirmation by a majority of the members of the legislature in joint session.

The Governor shall appoint each member on the basis of interest in public affairs, good judgment, knowledge, and ability in the field of action of the board, and with a view to providing diversity of interest and points of view in the membership.

The appointed members shall be residents of the state and shall be appointed without regard to political affiliation or geographical location of residence.

Governor Appoints
by April 1

Legislature Confirms
after hearings in joint session


Board Composition
7 members
Staggered 3-year terms starting July 1

Authority: AS 16.05.221, AS 39.05.060, AS 39.05.080, AS 39.05.100




3

3

Legal Framework for the Boards & ADF&G




- Alaska Constitution – written at statehood. Amended only with significant public interest.
- Alaska Statutes - written by legislature.
- Regulations – written by agencies to implement statutes.

4

4

Alaska Constitution



Article VIII, Natural Resources

- ∞ Gives authority to legislature, to provide for utilization, development, and conservation of natural resources belonging to State, for maximum benefit of people § 2.
- ∞ Policy of maximum use of resources consistent with public interest § 1.
- ∞ Fish, wildlife reserved to the people for common use § 3.
- ∞ Fish, wildlife utilized on sustained yield principle, subject to preferences among beneficial uses § 4.
- ∞ No exclusive right or special privilege of fishery, but some limited entry ok for specific purposes § 15.
- ∞ Laws governing natural resources shall apply equally to all persons similarly situated § 17.

5

Board of Game Power Delegated from Legislature



Board of Game – Key Authorities

- **AS 16.05.221(b)**: Board of Game created by the legislature; all powers and authority derived from statute. Established for “conservation and development” of game resources.
- **AS 16.05.241**: Board of Game has regulation-making powers (quasi-legislature), but no administrative, budgeting, or fiscal powers (executive branch powers).
- **AS 16.05.255**: Sets out regulation-making authority. The board has the power and duties to enact regulations.
- **AS 16.05.255**: Intensive Management Law
- **AS 16.05.258**: Subsistence Use & allocation of fish and game.
- **AS 16.05.270**: Each board may delegate power to the commissioner to act on its behalf.



6

Board of Fisheries Power Delegated from the Legislature



Board of Fisheries – Key Statutory Authorities


- **AS 16.05.221(a):** Board of Fisheries created by the legislature; all powers and authority derived from statute. Established for “conservation and development” of game resources.
- **AS 16.05.241:** Board of Fisheries has regulation-making powers (quasi-legislature), but no administrative, budgeting, or fiscal powers (executive branch powers).
- **AS 16.05.251:** Sets out regulation-making authority. The board has the power and duties to enact regulations.
- **AS 16.05.251(e)** Allocation Criteria
- **AS 16.05.258:** Subsistence Use & allocation of fish and game.
- **AS 16.05.270:** The board may delegate power to the commissioner to act on its behalf.
- **AS 16.05.730:** Management of Wild and Enhanced Stocks.



7

7

ADF&G Commissioner Power Delegated from Legislature



ADF&G – Key Statutory Authorities

- AS 16.05.020 describes the functions of the Commissioner.
- AS 16.05.050 describes the powers & duties of the Commissioner.
 - Commissioner can adopt regulations to implement authority.
 - Department has administrative and budget authority.
- AS 16.05.060: Emergency order authority to open or close seasons or areas or to change weekly close periods on game “when circumstances require.”

8

8

Board Authorities

Types of regulations adopted by the Board of Fisheries & Board of Game under AS 16.05.251 and 16.05.255



seasons

Controlling invasive species, disease & predation

AREAS

Subsistence C&T and ANS

Resident & non-resident

Promote fishing, hunting & trapping / preserve heritage

Quotas & bag limits

RESERVES & REFUGES

Observers

Regulating subsistence / general hunting for conservation

Requirements for Issuing Licenses & Permits

EXCLUSIVE (ETC.) REGISTRATION

Seasons for youth and elderly

UNLICENSED VESSEL REPORTING

Marine and intertidal aquatic plants

HABITAT IMPROVEMENTS

Size & sex restrictions

Methods and means

Markings & ID


Classifying game & fisheries

Intensive Management


9

9

Other Statutory Requirements



- Alaska Administrative Procedures Act (AS 44.62)
- Open Meetings Act (AS 44.62.310)
- Executive Branch Ethics Act (AS 39.52)



10

10

Fish & Game Advisory Committees



- Authorized under Alaska Statute 16.05.260.
- Established by the Joint Board of Fisheries & Game.
- 84 Committees supported by ADF&G Boards Support Program.
- Meetings are open to the public and attended by agency staff.

Purpose of Advisory Committees

- Develop Regulatory Proposals.
- Evaluate Regulatory Proposals.
- Provide a local forum for fish and game use & conservation.
- Consult with interested individuals and organizations including govt agencies.



11

11

Local Fish and Game Advisory Committees



Southeast (23 advisory committees)
 Angoon•Craig•East Prince of Wales Island•Edna Bay•Elfin Cove•Hydaburg•Hyder•Icy Straits•Juneau•Douglas•Kake
 •Ketchikan•Klawock• Klukwan•Pelican•Petersburg•Port Alexander•Saxman•Sitka•Summer Strait•Tenakee Springs
 •Upper Lynn Canal•Wrangell•Yakutat

Southcentral (19 advisory committees)
 Anchorage•Central Peninsula • Cooper Landing•Copper Basin•Copper River/Prince William Sound
 •Denali•Homer•Kenai/Soldotna•Matanuska Valley•Mt. Yenlo•Paxson•Prince William Sound/Valdez•Seldovia
 •Seward•Susitna Valley •Tok Cutoff/Nabesna Road•Tyonek•Whittier

Southwest (12 advisory committees)
 •Chignik•False Pass•King Cove•Kodiak•Lake Iliamna•Lower Bristol Bay•
 Naknek/Kvichak•Nelson Lagoon•Nushagak•Sand Point•Togiak•Unalaska/Dutch Harbor

Interior (17 advisory committees)
 Central•Delta•Eagle•Fairbanks•Grayling• Anvik, Shageluk and Holy Cross
 (G.A.S.H.)•Koyukuk•Lake Minchumina•McGrath•Middle Nenana River•Middle Yukon
 River•Minto/Nenana•Ruby• Tanana/Rampart/Manly•Upper Tanana/Forty Mile
 •Yukon Flats•Stony-Hollitna

Arctic (9 advisory committees)
 •Kotzebue•Lower Kobuk•Noatak/Kivallina•Northern Norton Sound•Northern Seward
 Peninsula•North Slope•St Lawrence Island•Southern Norton Sound•Upper Kobuk

Western (6 advisory committees)
 Bethel•Central Bering Sea•Central Kuskokwim•Coastal Lower Yukon
 •Lower Kuskokwim•Mid-Lower Yukon

Alaska's 84 Advisory Committees



1. Southeast
2. Southcentral
3. Southwest
4. Western
5. Arctic
6. Interior


www.advisory.adfg.alaska.gov

12

12

Steps in the State Regulatory Process

- Call for Proposals – Issued in Winter, Spring Deadlines
- Distribution of Proposals - September
- Public & Agency Review and Comment
- Board Regulatory Meetings
- Legal Review by Department of Law
- Made Official by Lt. Governor
- Typically, Effective July 1st
- Regulations are made available to public by ADF&G
- Enforced by Alaska Wildlife Troopers



13

13

Sources of Input to the Boards

- General Public
- Interest Groups & Associations
- Local, State, & Federal Agencies
- Tribal Governments, Village Councils
- Fish and Game Advisory Committees
- Regional Advisory Councils and
Subsistence Resource Commissions
- Legislators



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Board of Game Meeting Cycle




Three-year Cycle; Proposal Deadline May 1 each year

- 2024-2025 (2027/2028, 2030/2031...)
 - Central & Southwest Region (GMUs 8, 10, 11, 13, 14A, 14B, 16 & 17) and Statewide Provisions (Chapter 92 regulations)
- 2025/2026 (2028/2029, 2031/2032 ...)
 - Southeast & Southcentral Regions (GMUs 1, 2, 3, 4, 5, 6, 7, 8, 14C & 15)
- 2026/2027 (2029/2030, 2032/2033 ...)
 - Interior, Western and Arctic Regions (GMUs 12, 18, 19, 20, 21, 22, 23, 24, 25, & 26)

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Board of Fisheries Meeting Cycle




Three-year Cycle; Proposal deadline April 10 each year

- 2024/2025 (2027/2028, 2030/2031 ...)
 - Prince William Sound finfish, Southeast and Yakutat Finfish and Crab, All other Shellfish
- 2025-2026 (2028/2029, 2031/2021 ...)
 - Alaska Peninsula/Aleutian Islands/Chignik, Arctic/Yukon/Kuskokwim, Bristol Bay, and Statewide Provisions for Finfish
- 2026/2027 (2029/2030, 2032/2033 ...)
 - Lower and Upper Cook Inlet, and Kodiak Finfish

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Procedures for Out-of-Cycle Actions




- Agenda Change Request Policies (5 AAC 92.005 – BOG & 5 AAC 39.999 – BOF)
- Joint Board Emergency Petition Policy (5 AAC 96.625)
- Subsistence Proposal Policy
- Board Generated Proposals
- Category 2 measures in BS/AI King/Tanner Crab Fishery (5 AAC 39.998)

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Proposal Form



- Due May 1 of each year for Board of Game.
- Due April 10 of each year for Board of Fisheries.
- Up to 150 – 400 proposals a year.
- Many sources of proposals
- Online submission is available.
- Proposals must fit criteria on Call for Proposals.

ALASKA BOARD OF FISHERIES
REGISTRATION PROPOSAL FORM 2024-2025
P.O. BOX 11526, JUNEAU, ALASKA 99911-0526

**Submitted in Person at JFA*

BOARD OF FISHERIES REGULATIONS
 Subsistence Personal Use
 Sport Commercial

Which meeting would you like to submit your proposal to?

<input type="checkbox"/> Pylow William Sound and Upper Copper/Upper Seldovia Fisheries	<input type="checkbox"/> Southeast and Yakutat Crab, Shrimp, Misc. Shellfish (including Dungeness, King and Tanner)
<input type="checkbox"/> Southeast and Yakutat Halibut (including salmon, herring, greenfish)	<input type="checkbox"/> Southeast Dungeness Crab, Shrimp, Misc. Shellfish (except Southeast and Yakutat) and Supplemental Items

Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal, address only one issue per proposal. State the issue clearly and concisely. The board will expect multiple or continuing items.

1. Alaska Administrative Code Number 5 AAC:

***2. What is the issue you would like the board to address and why?**

***3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

***Submitted By:** _____
Individual or Group


***Address:** _____ ***City, State:** _____ ***ZIP Code:** _____

***Home Phone:** _____ ***Work Phone:** _____ ***Email:** _____

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Public Comment Process




- Written Comment “On-time” Deadline Preferred
 - Typically, 2-Weeks prior to meeting
 - 100-page limit
 - Comments are organized and cross-reference with proposals.
- Written Comment Accepted During Meetings
 - 10-page or less limitation
 - Not cross-referenced with proposals.
- Oral Testimony
 - 5 minutes or less;
 - 10-15 minutes for ACs and Regional Advisory Councils
- BOF Committee Process


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Before a Board Meeting



- Review online proposal book
- Check board websites for available research – 2 weeks from a meeting.
- Submit written public comment – 2 weeks prior to meeting.
- Review advisory committee, staff, and other public comments.
- Index of Comments prepared to provide a summary of comments in support and opposition for every proposals.



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Typical Agenda for Board Meetings



- Introductions, ethics disclosures
- Agency Reports
- Oral Public Testimony
- BOF Committees (small and COTW)
- Board Deliberations on Proposals
- Miscellaneous Business

All elements of building a clear record

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Agency Input





- Alaska Dept. of Fish & Game
- Department of Law
- Department of Public Safety/Alaska Wildlife Troopers
- USF&WS - Office of Subsistence Management
- Commercial Fisheries Entry Commission
- North Pacific Fishery Management Council
- Federal Agencies National Park Service, USF&WS, US Forest Service


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Getting Involved



- Sign up on the Board's & AC email lists
- Proposal submission
- Written comment submissions on proposals
- Attend Board meetings and present testimony.
- Attend local F&G Advisory Committee meetings.
- Work with ADF&G & other agencies.



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Summary



- Process is structured & deliberative.
- Boards rely heavily upon public & agency participation
- Boards make allocative & regulatory decisions.
- ADF&G implements the regulations and manages the resources.

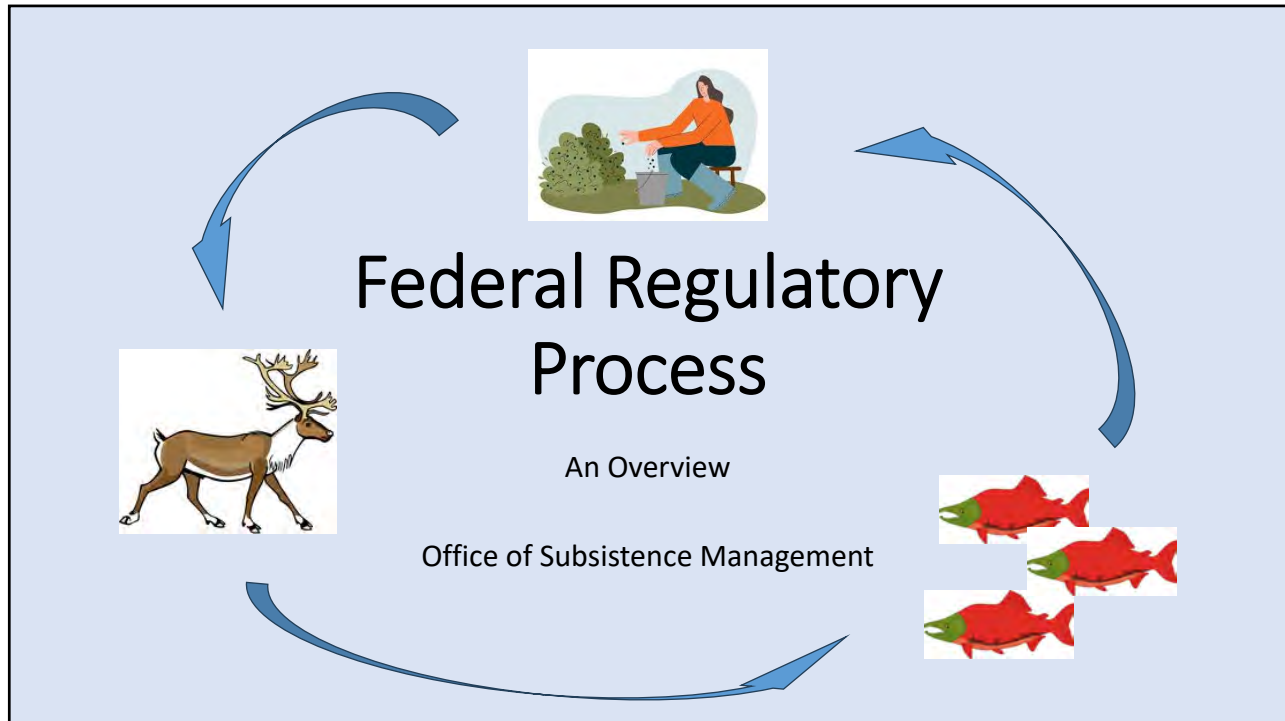


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Federal Regulatory Cycles

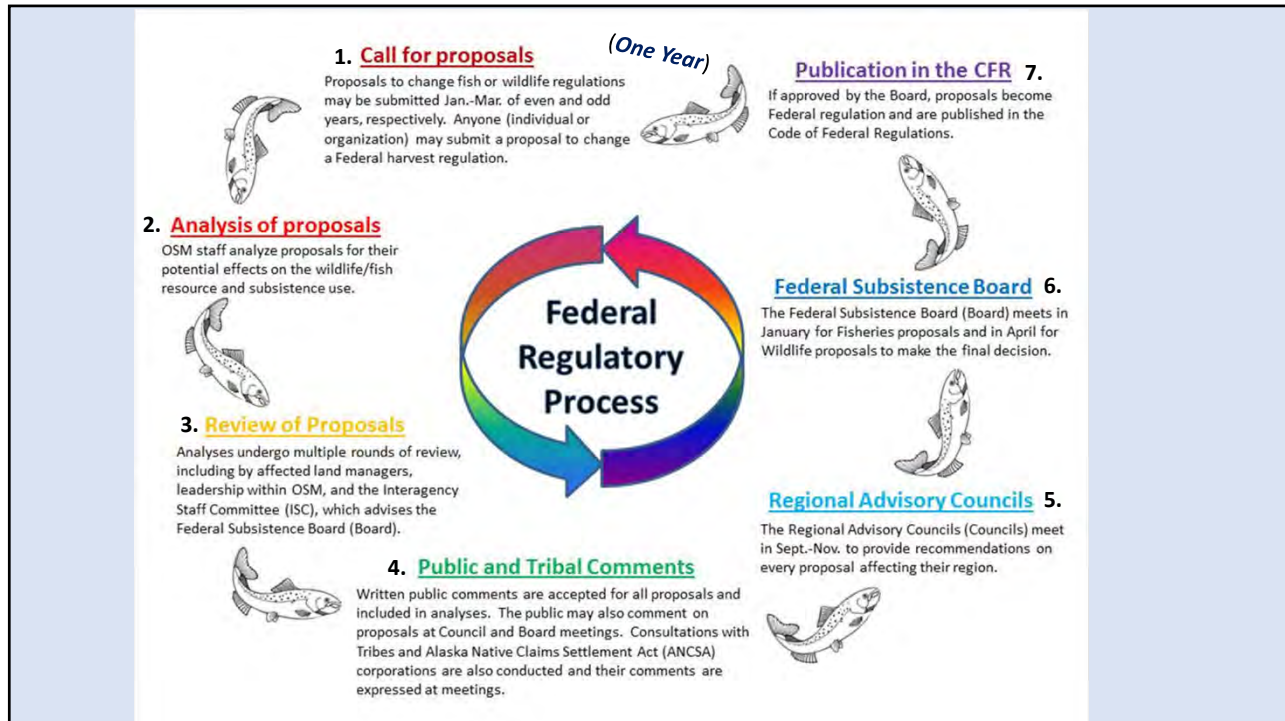
- **Even years:** Wildlife harvest regulations
 - Current regulatory cycle: July 1, 2024-June 30, 2026



- **Odd years:** Fisheries harvest regulations
 - Current regulatory cycle: April 1, 2023-March 31, 2025
- **Every four year:** Non-rural determination proposals

2



3

1. Call for Proposals

- Window to submit proposals to change fish or wildlife harvest regulations opens for ~45 days (proposed rule published; usually March)
- **Anyone (individual or organization) may submit a proposal**
 - Via Online portal or at Council meeting
- Include: Name, regulation change, why change is needed
- Informational flier

Federal Subsistence Board Informational Flyer

How to Submit a Proposal to Change Federal Subsistence Regulations

Alaska rural residents and the public are an integral part of the Federal regulatory process. Any person or group can submit proposals to change Federal subsistence regulations, comment on proposals, or testify at meetings. By becoming involved in the process, subsistence users and the public assist with effective management of subsistence activities and ensure consideration of traditional and local knowledge in subsistence management decisions. Subsistence users also provide valuable fish and wildlife harvest information.

A call for proposals to change Federal subsistence regulations is issued in January of even-numbered years for fish and shellfish and in odd-numbered years for wildlife. Proposals to change the seasonal determinations will be accepted in January of every other even-numbered year (every other fish cycle). The period during which proposals are accepted is no less than 30 calendar days. Proposals must be submitted within this time frame. Amendments are made each year regarding the proposals being accepted and timelines that apply.

You may propose changes to Federal subsistence season dates, harvest limits, methods and means of harvest, customary and traditional use and seasonal determinations.

What your proposal should contain:

There is no form to submit your proposal to change Federal subsistence regulations. Include the following information in your proposal submission (you may submit as many as you like):

- Your name and contact information (address, phone, fax, or e-mail address)
- Your organization (if applicable)
- What regulations you wish to change. Include gear management unit number, drainage or area, and species. Quote the current regulation if known. If you are proposing a new regulation, please state "new regulation."
- The proposed regulation written as you would like to see it
 - An explanation of why this regulation change should be made
 - Any additional information that you believe will help the Federal Subsistence Board (Board) in evaluating the proposed change

1011 East Tudor Road 345-112 • Anchorage, Alaska 99503-4718 • subsistence@fws.gov • (907) 478-1416 • (907) 758-1888
This document has been cleared for public release #781772022.

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1.5 Validation of Proposals

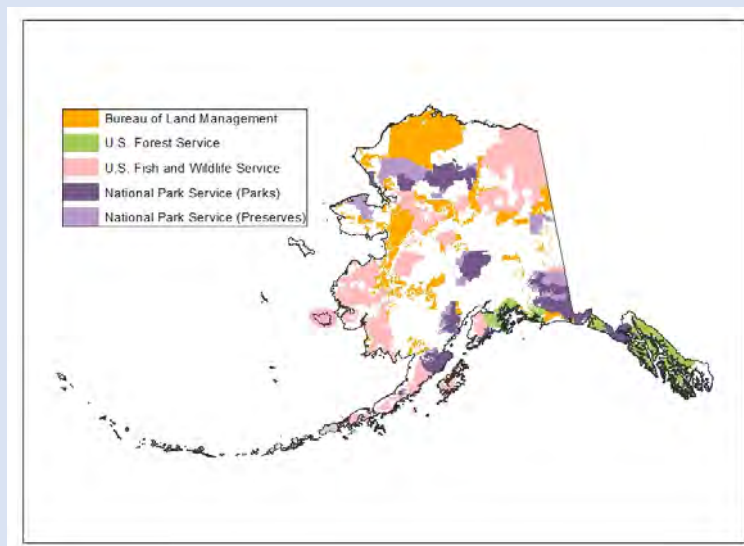
- Proposals are reviewed by staff and validated to ensure that they fall within the authority of the Federal Subsistence Board.
- Valid proposals are compiled, and made available to the public for information and comment.
- Public comment period on submitted proposals (usually summer)



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2. Analysis of Proposals

- OSM staff analyze proposals for their potential effects on the wildlife/fish resources and subsistence uses.



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3. Review of Proposals

- Analyses undergo multiple rounds of review, including by:
 - Affected land managers
 - Federal biologists and social scientists at National Parks and National Wildlife Refuges.
 - Alaska Department of Fish and Game
 - Leadership within OSM
 - Interagency Staff Committee (ISC)
 - The ISC advises the Federal Subsistence Board.



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4. Public and Tribal Comments

- A written public comment period opens for ~60 days (usually summer)
 - These comments are included in analyses and presented at meetings
- Public comment opportunities at Council and Board meetings
- Tribal and ANSCA Corporation consultations conducted



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5. Regional Advisory Councils

- Councils provide recommendations on proposals affecting their region at their Fall meetings
- Councils consider the staff analysis, **public comments**, and personal knowledge
- Council recommendations on take have deference



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6. Federal Subsistence Board

- The Board makes the final decision on proposals
 - Fisheries in January
 - Wildlife in April
- Usually Follow Council recommendations
- Opportunity for public and Tribal testimony during meeting



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7. Publication in the CFR


- Proposals approved by the Board become Federal regulation
- The Final rule is published in the Code for Federal Regulations (CFR)
- Handy-dandy regulations manual
- Regulations are effective for two years



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Special Actions

- Temporary, out-of cycle regulation change (i.e. season, harvest limit, closures)
 - Emergency special action (< 60 days)
 - Temporary special action (public hearing)
- **Anyone may submit a special action**
 - Via e-mail to OSM (subsistence@ios.doi.gov)
- Include: Contact Info, regulation change, extenuating circumstance necessitating immediate change
- Informational flier



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

**Federal Subsistence Board
Informational Flyer**



Forest Service

Contact: Subsistence Policy Coordinator
(907) 786-3888 or (800) 478-1456
subsistence@fws.gov

**How to submit a Special Action Request
to the Federal Subsistence Board**

The regulatory cycle for changes to fish/shellfish and wildlife regulations takes place every two years. A call for proposals to change fishing regulations is issued in January of even numbered years and odd numbered years for wildlife. A Special Action Request is an out-of-cycle change of a season, harvest limit, or method of harvest. Special Actions are taken when unusual situations arise, such as a significant change in resource abundance that could not reasonably have been anticipated. The Federal Subsistence Board (Board) may take a Special Action to restrict, close, open, or reopen the taking of fish and wildlife on Federal public lands and waters. Such actions are taken to ensure the conservation of healthy populations of fish or wildlife, ensure the continued viability of a particular fish or wildlife population, to ensure continued subsistence use, or for reasons of public safety. These guidelines and requirements can be found in [36 CFR 242.19](#) and [50 CFR 100.19](#).

To submit a Special Action request, please provide the following information:

- Name
- Address
- Telephone number
- Fax number (if applicable)
- E-mail address
- Organization (if applicable)
- Describe the action you are requesting; reference the current regulations you wish to change
- List if there have been unusual or significant changes in resource abundance or unusual conditions affecting harvest opportunities that could not reasonably have been anticipated and that potentially could have significant adverse effects on the health of fish and wildlife populations or subsistence users
- State if requested action is to ensure the conservation of healthy populations of fish or wildlife, ensure continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons
- State the extenuating circumstances that necessitate a regulatory change before the next regulatory review

How a Special Action request is processed:

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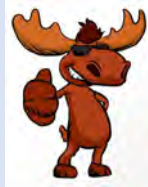


Dual harvest management



State regulations

- Apply to everyone (all AK residents and non-residents)
- Apply on all lands (except National Parks)
- Alaska Board of Game/Fisheries
- Fish and Game ACs
- ADF&G
- 3-year regulatory cycle
- Emergency Orders

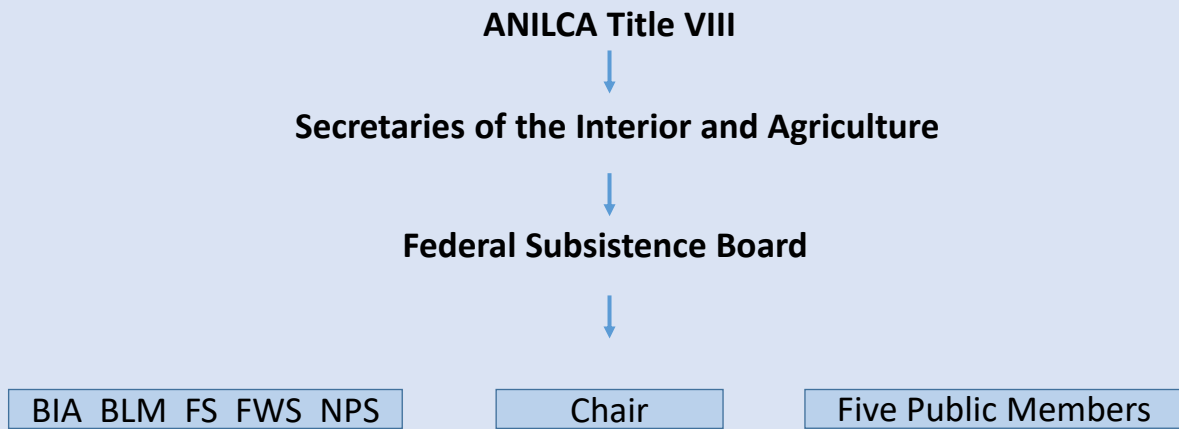


Federal regulations

- Apply to Federally qualified subsistence users (except closures)
- Only apply on Federal public lands
- Federal Subsistence Board
- Regional Advisory Councils
- OSM
- 2-year regulatory cycle
- Special actions
- Federal closures supersede State regs on Federal public lands

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Program & Board Structure



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FSB Powers & Duties

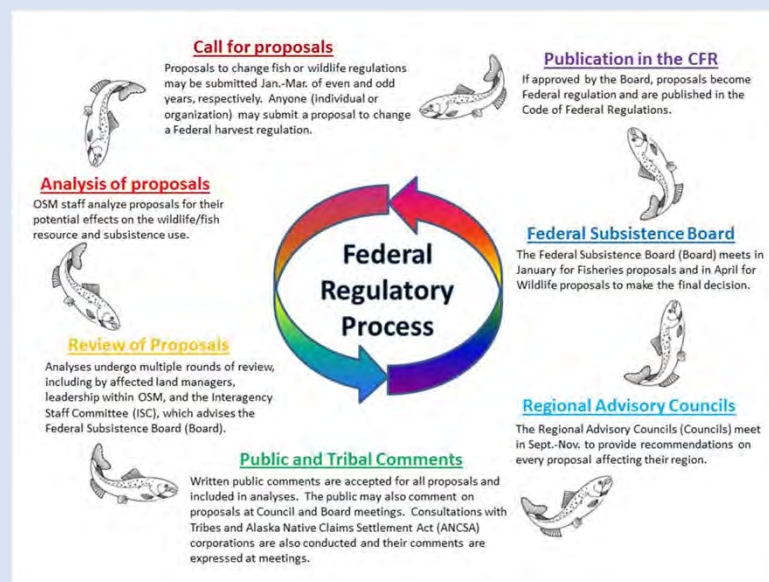
ANILCA Title VIII

Important Duties and Responsibilities include:

- Promulgate regulations for the management of subsistence use & taking of Fish and Wildlife
 - Including seasons, harvests, method and means, customary and traditional use determinations, customary trade, and nonrural determinations
- Ensure subsistence priority on Federal public lands
- Allocate subsistence use of fish and wildlife resources of public lands
- Restrict or eliminate taking of fish and wildlife on public lands
- Issue emergency or temporary special actions

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Thank-you and Questions



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Resource Development Committee Update

1) Ambler Road

- a. Comments submitted on Draft SEIS
- b. Final SEIS and Record of Decision released in 2024 – rejected permitting of road
- c. Likely that road permitting may again become an issue in 2025

2) D1 Land Withdrawal

- a. Comments submitted on Draft EIS
- b. Final EIS and Record of Decision released in 2024 maintaining D1 Withdrawals

3) NPR-A Special Area Rulemaking

- a. NPR-A Rule finalized April 2024
- b. Recommendations for new/expanded Special Areas accepted through September

4) Teshekpuk Lake Conservation Right of Way

- a. Mitigation measure resulting from the Willow oil and gas development
- b. Intended to provide long-term protection to the Teshekpuk Caribou Herd and subsistence around Teshekpuk Lake
- c. Details still being finalized

5) Graphite One Mine

- a. Mining interest on the Seward Peninsula
- b. Still in exploration phase, no proposal yet

6) OTZ Microwave Tower Broadband Project

- a. BLM and FWS released preliminary EA in June 2024

7) Anarraaq - Aktigiruaq Mining Exploration

1) Ambler Road Project

Why a new EIS?

In July 2020, the Bureau of Land Management (BLM) approved permitting of an Ambler access road, however, in response to lawsuits by the Tanana Chiefs Conference, several villages in the region, and conservation groups BLM was directed to address issues with the previous approval, leading to a Supplemental Environmental Impact Statement (SEIS) process.

Working Group comments

At the 2023 Annual Meeting, the Working Group voted to submit comments on the Draft SEIS that reiterated our opposition to the road, identified improvements and remaining issues in the Draft SEIS document, and asked BLM not to approve permitting of the road. These were submitted in late December. A copy of the comments is included on the following pages.

Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

P.O. Box 175, Nome, AK 99762

December 19, 2023

Stacie McIntosh
Ambler Road SEIS Project Manager
Bureau of Land Management
BLM Fairbanks District Office
222 University Avenue
Fairbanks, AK 99709

RE: Ambler Road Draft Supplemental EIS Comments

Dear Ms. McIntosh,

On behalf of the Western Arctic Caribou Herd Working Group (Working Group) I submit the following comments on the Bureau of Land Management's (BLM) Draft Supplemental Environmental Impact Statement (DSEIS) for the Ambler Road. The Working Group is a permanent organization of stakeholders that works to ensure conservation of the Western Arctic Caribou Herd (WACH) and to maintain traditional and other uses now and into the future. The Working Group consists of Alaska Native subsistence users from communities within the range of the herd, other Alaskan hunters, guides, transporters, conservationists, and reindeer herders. Since its formation in 1997, the Working Group has submitted numerous advisory recommendations to government agencies, regulatory boards, and other bodies to support decisions that will ensure the long-term conservation of the WACH.

The Working Group has been very interested in the Ambler Road decision and has actively engaged in the Ambler Road EIS process, with multiple meetings with BLM staff and with formal comments provided at the scoping and draft phase of both the EIS and SEIS processes. We are concerned about the detrimental effects a road would have on caribou, their habitat, and the people who rely upon them for food security and customary and traditional ways of life. For these reasons, **the Working Group passed a motion in 2018 opposing creation of the Ambler Road.** In 2019, we requested that BLM change its preferred alternative in the Final EIS to the No Action Alternative and not approve the Alaska Industrial Development and Export Authority's (AIDEA) application for a right-of-way (ROW) authorization across federal land. Unfortunately, this request was not accommodated. We were again disappointed to see in the DSEIS that BLM proposes to approve the Ambler Road right-of-way application (BLM 2023a p. ES-1). We ask that BLM reconsider and not allow permitting of the Ambler Road.

WACH status and the Ambler Road

For many years, the WACH was the largest caribou herd in Alaska, with nearly 500,000 animals at its peak in the early 2000s. This large, wide-ranging herd provides a crucial subsistence resource to residents of approximately forty remote communities spread across the range of the WACH, as well as many others who rely on caribou for their livelihoods or other reasons, as described above. The herd also plays an important role in a healthy environment that supports many other species and natural processes. Unfortunately, for about two decades the herd has been in serious decline. The 2023 count of 152,000 represents the lowest numbers since the 1970s.

There are very real consequences for subsistence hunters and other people in the WACH range of the consistent long-term decline of the herd. At our annual meeting last year, the Working Group voted to recommend a reduced subsistence harvest limit from five caribou per day to four per year, only one of which may be a female, as well as a pause on all non-resident harvest. This is not a recommendation we made lightly, knowing that it will have impacts on those who rely upon caribou most. However, in light of persistent declines we felt the need to take action in alignment with the Working Group's Cooperative Management Plan. When the people we represent are being asked to reduce their use of the WACH because of low herd size, allowing permitting and construction of an industrial mining road that BLM acknowledges will likely impact caribou habitat use, population size, and availability for subsistence is unconscionable.

It is notable that "during Government-to-Government consultation, all WAH communities expressed deep concern over the population decrease and stressed their fears that construction and use of the proposed road may further decrease the population" (p. M-9). Indeed, the DSEIS acknowledges that "habitat fragmentation could result in decreased abundance of caribou over time" and that impacts from a potential road "could exacerbate or prolong population declines and hinder the herd's ability to naturally recover from low population levels" (BLM 2023a p. M-9, M-28). The ANILCA 810 Evaluation reported in the DSEIS found significant restriction of subsistence for 30 or more communities, including many represented on the Working Group, was likely under each of the action alternatives. In many cases this finding is strongly influenced by expectations of population-level impacts to the WACH and reductions in the availability of caribou along with delays and deflections of migration. Under the cumulative case considering the proposed road, associated mines, climate change, and other reasonably foreseeable developments, the ANILCA 810 Evaluation concluded that "population-level impacts could extend to the 42 WAH WG communities, particularly those with a moderate to high resilience on the resource" (BLM 2023a p. M-36). These findings are of grave concern to the Working Group. We plead with BLM to heed the many warnings laid out in the DSEIS and to not proceed with permitting a road.

Improvements in the DSEIS

We are grateful that BLM has produced this DSEIS to address some of the deficiencies in the previous Ambler Road EIS. There are several areas in which the DSEIS has been improved that we describe below.

We appreciate the multiple references to the Working Group in the DSEIS, including acknowledgement of our moving the status of the WACH to “Preservative Declining” in response to the ongoing decline in herd size (e.g., BLM 2023a p.3-210). We are glad to see that BLM has paid attention to the Working Group and its concerns and hope that it will continue to do so and will act in accordance with our request to select the No Action Alternative.

One of the issues raised by the Working Group in both our DEIS and SEIS Scoping comments was the potential for the road to switch from commercial-only access to public access in the future, based on the past history of road use in Alaska. We were pleased to see that after largely ignoring these concerns in the initial EIS process, BLM gave them greater consideration in the DSEIS. While being concerned by the possibility, we appreciate that BLM acknowledged that public use and trespass on the road are considered reasonably foreseeable as expected impacts and are analyzed as such in the DSEIS. We agree that there are a number of potentially harmful effects that such public use would have on caribou and subsistence use. We also are concerned about the potential for increased complexity of hunting regulations, which may create uncertainty for subsistence users in the region. The Working Group often seeks to make hunting regulations more clear and consistent, rather than adding additional levels of complexity as would likely be required if the road eventually was opened to the public.

Another change in the DSEIS is consideration of a 2-phase option that would skip construction of a seasonal pioneer road and proceed straight to a year-round single-lane road. This would have the effect of reducing the number and duration of construction periods, which may have stronger impacts on caribou and other species, as well as on subsistence. If a ROW is permitted, the Working Group is supportive of using a 2-phase approach to reduce construction phases. Furthermore, clear guidance should be provided about what would underlie the decision to allow the project to proceed to Phase 3, as the DSEIS says a Phase 3 road may never be needed. This should only be allowed after it has been established that a Phase 3 road is necessary and will avoid, minimize, and mitigate environmental harm.

We appreciate that the ANILCA 810 Evaluation was expanded to include all caribou subsistence study communities. As we have noted above and in previous comments, due to the mobile nature of the WACH impacts occurring in one part of the herd range may affect residents of communities far distant from the site of those impacts. We affirm the DSEIS statement that “a lack of caribou harvests does not mean that caribou is no longer culturally important to those communities” (BLM 2023a p. M-17). Caribou vary their use of habitats widely over time showing strong fidelity to certain seasonal ranges, such as their calving grounds (Cameron et al. 2020), but less fidelity to other seasonal ranges, with periodic use, abandonment, and later reuse. As herd size changes caribou may expand or contract their range use accordingly (e.g., Taillon et al. 2012, Virgl et al. 2017). Areas used heavily when populations are high may be temporarily abandoned at lower population sizes and then reused when the herd increases again. In light of this, it is important that BLM consider historic patterns of caribou space use and subsistence harvest rather than only looking at recent patterns as the herd decreases in size. Caribou are an important resource for all the communities represented on the Working Group and should be considered as such in the FSEIS.

Concerns and issues needing to be addressed in the DSEIS

While the DSEIS benefitted from the improvements described above, there remain a variety of areas in which improvement is needed in the DSEIS to address concerns and issues. It is very important for BLM to consider the full cumulative impacts both of a potential Ambler Road and the additional access roads and mines that it would support. The DSEIS acknowledges that “habitat loss and alteration due to the reasonably foreseeable development of the [Ambler Mining] District could equal or exceed that from the road itself...and exponentially increase fragmentation of migratory and winter range” (BLM 2023a p. 3-147). Any such impacts to the WACH and its availability for subsistence harvest and other uses is of great concern to the Working Group. We agree with the DSEIS statement that “subsistence-based communities are vulnerable to even small changes in resource distribution as these changes may have larger impacts on residents’ ability to access hunting grounds” (BLM 2023a p. 3-211) and that “while certain local changes to resource movement or distribution may seem minimal from a biological perspective (i.e., not affecting overall population levels, body condition, herd ranges, etc.), local changes can have much larger impacts on resource availability to local hunters” (BLM 2023a p. 3-218). These observations reinforce why even relatively small impacts on caribou and their distribution are of great concern. Unfortunately, the impacts of the proposed project, especially with the cumulative mining development it would facilitate, are relatively large and may greatly affect both caribou and their users. This is of grave concern and reinforces the importance of BLM selecting the No Action Alternative.

The updated text description of the Ambler Mining District and Land Status in the DSEIS Introduction describes seven communities as harvesting resources from lands and waters within the Ambler Mining District (BLM 2023a p. 1-4). As we note above, around 40 communities rely on the WACH, which uses lands within the District and elsewhere along the proposed road corridor and thus would be affected by any permitted road. While this is acknowledged elsewhere in the DSEIS, it is important that it also be made clear here at the outset of the Introduction to make clear the broader impacts of development in the District.

The Working Group acknowledges the importance of increasing communications access, decreasing costs of fuel and other goods, and providing additional jobs for communities in proximity to the proposed road. However, we question whether the benefits of the proposed road will outweigh the expected costs, especially as the DSEIS itself acknowledges that recent studies of road-connected communities show substantially lower subsistence harvest than those not connected by roads and conclude that loss to subsistence would likely not be offset by an increase in income (BLM 2023a p. M-40). Such findings reinforce our opposition to the road.

The DSEIS states that the WACH has shown the same general movement patterns for the last 50 years (BLM 2023a p. 3-127). It is important to note recent patterns of altered timing and location of fall migration and winter use with fewer animals crossing the Kobuk River and more wintering north of the Brooks Range mountains (Joly and Cameron 2022). These changing patterns have impacted subsistence availability for many communities that formerly received large numbers of caribou and have altered scientific practices, leading to helicopter-based captures in spring for collaring caribou, rather than boat-

based captures at Onion Portage. Such recent patterns may be indicative of future trends under climate change and should be clearly described in the FSEIS beyond simply noting increased use of northern wintering areas since the FEIS was published.

While taking into account recent changes, it also is important that the DSEIS gives adequate attention to historic patterns of use. As we note above, research has shown that as herd size changes caribou may expand or contract their range use accordingly (e.g., Taillon et al. 2012, Virgl et al. 2017), which may alter interactions with the road. Group size also appears to influence caribou responses to disturbance in some cases. For example, larger groups may have difficulty crossing infrastructure (e.g., Smith and Cameron 1985). Over a 50+ year timeframe of the road and mines, the WACH is likely to exhibit increases and decreases in size. It is crucial that the Ambler Road and associated mines are designed to afford population protection at both high and low population levels and that the DSEIS analyze expected effects across multiple population sizes.

When describing the influence of insects on caribou behavior, the DSEIS claims that during the insect harassment season “avoidance of insects becomes the only factor that influences habitat selection during conditions conducive to insect activity” (BLM 2023a p.3-128). This statement is not in alignment with the best-available scientific information. While insect activity does have a strong influence on caribou behavior and habitat selection, it is not the only factor that influences these processes. Recent work with the Central Arctic Herd found that adult female caribou avoid infrastructure more than expected by chance and that this avoidance continues during the mosquito harassment season, albeit at shorter distances than during calving or post-calving (Johnson et al. 2020). Similarly, Severson et al. (in press) found that while resource selection and probability of road crossing during insect harassment was strongly influenced by the level of insect harassment, they also were affected by traffic volume and distance to road. Clarification of this point is crucial as the current DSEIS text may erroneously imply that the proposed roads would have no effect on caribou during insect harassment. While most of the WACH interacts with the proposed road corridor in other seasons, it is nonetheless important to clarify that infrastructure and human activity can affect caribou movement, distribution, and habitat selection even when other environmental factors are also having a strong impact. The FSEIS needs to be updated to better conform with this best available scientific information.

The DSEIS states that “the reduction of lichen-dominated vegetation types would result in disproportionately greater impacts on the WAH than reduction of other vegetation types” (BLM 2023a p. 3-133). We agree that winter food availability is important for caribou and share concerns about potential of the proposed road to reduce lichen availability for overwintering caribou. We appreciate that the mean percentage lichen cover was calculated for each alternative but were surprised that no mapping was done of this information. It would be helpful to see maps of lichen cover along each route at a meaningful scale that allows evaluation of whether alteration in the proposed route would avoid areas of high potential winter food availability for caribou. We request that such mapping be included in the FSEIS.

We agree with the DSEIS' observation that even relatively low traffic levels, compared to some prior studies, can have detrimental effects on caribou movement patterns. Indeed, recent work by Prichard et al. (2022) and Severson et al. (in press) found behavioral responses of caribou even at low traffic levels while Smith and Johnson (2023) found that caribou rarely crossed winter roads with any level of traffic. These citations should be incorporated into the FSEIS (e.g., at p.3-136). Indigenous Knowledge and Western scientific information agree that impacts to caribou are expected from a road, reinforcing the Working Group's request that BLM select the No Action Alternative.

Our elders and hunters have shared repeatedly that the Arctic is changing in ways that affect the caribou and those who rely upon them. Climate change is of great concern for the future of the WACH, especially to the extent that it alters migration behavior and increases stresses like rain on snow events and winter icing, which can affect food availability for caribou. We agree with the DSEIS' statement that "habitat fragmentation or displacement resulting from development may limit the ability of caribou to withstand and adapt to climate change" (BLM 2023a p.3-149). With the herd in decline and no clear signs of climate change being sufficiently addressed nationally or globally, this is a great concern for the WACH. Selecting the No Action Alternative would be a step by BLM to avoid adding pressures of fragmentation and displacement to the WACH and its users.

According to the DSEIS, if the road is allowed to proceed it could be completed before any associated mines have their own approvals (BLM 2023a p. H-9). Allowing this runs the risk of a road being completed, with all of its associated detrimental impacts described in the DSEIS, but without a guarantee that mine development will be permitted or completed. Instead, we request that it be specified that the road cannot be constructed until at least one mine also has its approval to better ensure that at least some financial benefits accompany the costs of the road. Again, this is a secondary choice and our primary recommendation is to disallow both the road and mines by selecting the No Action Alternative.

Reclamation of the proposed road

Another area of concern surrounds reclamation of the proposed road. While AIDEA proposes to remove the road and supporting infrastructure and reclaim and restore the habitat within the ROW, they have not provided a reclamation plan and do not intend to do so until close to the proposed road closure about 50 years from now (BLM 2023a p. 1-3). This raises serious questions about whether AIDEA will actually be able to conduct meaningful reclamation and whether the standards they propose will be sufficient to actually repair the harms they have done. By the time AIDEA proposes a mitigation plan they will already have reaped the financial benefits of decades of mining, leaving a diminished ability to meaningfully address deficiencies in the plan they eventually propose. While we agree that it is important to allow flexibility for plan improvements with new scientific studies and technological advances in restoration approaches, we also request that before a ROW is approved a detailed reclamation plan be developed and made available for public comment that demonstrates that a technically feasible reclamation plan exists, that it is in alignment with the best available scientific

information and Indigenous Knowledge about environmental impacts of a potential road and mining and their remediation. We also request that AIDEA be required to provide bonding before beginning construction to fund reclamation and restoration (e.g., BLM 2023a p. 2-13). This must be sufficient to fully support the proposed measures, based on other similar projects and protected from inflation. Until these requirements are met, no ROW should be issued. Additional details on these and other mitigation measures pertaining to reclamation are included in the next section.

A major concern with the proposed reclamation is whether it will happen. The DSEIS states that,

“mining companies may request, from the underlying landowner(s), that some segments of the road within the District stay open and revert to mining company control to allow their continued access from the Dahl Creek airport or mining company airstrips to the mines for required water treatment and monitoring activities, to be conducted potentially in perpetuity” (BLM 2023a p.2-12).

This indicates that not all roads may be removed from the program area and that some roads, aircraft activity, and traffic are likely to continue even after mining ceased. That these activities may continue “in perpetuity” suggests such roads and airstrips may never be removed and recovered, leading to continuing impacts to caribou, subsistence, and other wildlife and habitats. While the DSEIS states that such requests would require separate environmental approvals, their possibility nonetheless raises grave concerns about whether impacts will truly be removed in the future.

Related to the above, we are concerned about the effect of multiple jurisdictions on the likelihood of the road remaining closed to public access. The DSEIS indicates that owners of land crossed by the road could each decide what users to authorize, with AIDEA having to allow access (BLM 2023a p. H-27). In the same appendix, the DSEIS notes that the Alaska Department of Transportation & Public Facilities produced a report on potential infrastructure that states that if the Ambler Road is developed, nearby communities “could potentially connect to the National Highway System on a permit basis” (BLM 2023a p. H-33). The DSEIS acknowledges that “once communities are connected to the road for commercial purposes, it is unlikely that those commercial uses would be discontinued” (BLM 2023a p. H-33). This raises the question of whether the State of Alaska intends the road to be removed after mining or instead intends to provide long-term connections for communities to the road system. It also raises questions about what kind of access might be allowed for state-owned lands that could affect access and use across the road system.

Experience at the Red Dog Road also raises questions about whether AIDEA truly intends to remove the Ambler Road after its 50-year ROW ends. The DSEIS points out that a 2017 document from AIDEA describes potential uses of the Red Dog Road after current mining ends, including additional exploration and development, research, tourism, or Arctic shipping (BLM 2023a p.H-33). While it is unclear how directly this would transfer to future proposals for use of an Ambler Road by AIDEA, it raises the possibility that they will propose other uses of the road in the future, rather than seeking to reclaim and restore it.

Furthermore, the DSEIS states that AIDEA proposes to place fiberoptic communications lines for internet and phone service along the road (BLM 2023a p. H-35). It states that it is likely communities may want to connect to these lines to enhance their internet and phone access. However, the DSEIS fails to link this likelihood to a corresponding decrease in the likelihood of removal of these internet and phone lines after the road ROW ends. It seems likely that providing a public good like internet and phone access will be deemed important enough to justify retaining infrastructure instead of pursuing full reclamation. The FSEIS should acknowledge and fully analyze this possibility.

The DSEIS also acknowledges that reduction or abandonment of wildlife habitat, subsistence use areas, and cultural resources and uses are considered irreversible and cannot be fully recovered (BLM 2023a p. 3-252). Similarly, it is concluded that changes to subsistence uses would occur with high likelihood or a long or permanent duration. This is a serious concern that questions whether reclamation is really possible. Even if reclamation occurs, the DSEIS acknowledges that linear features would remain and their use by predators such as wolves could continue to lead to higher predation rates in the vicinity of the Ambler Road corridor for decades after the road is closed (BLM 2023a p. 3-139). In a time when residents of northwestern Alaska are being asked to reduce their subsistence harvest of caribou, the potential for increased predation facilitated by the project activities, even after removal, is of great concern. According to the DSEIS this is something that may happen even if reclamation occurs, reinforcing the importance of BLM selecting the No Action Alternative.

Other persistent impacts are acknowledged by the DSEIS that would continue beyond mine closure. For example, fencing would be placed around closed mines to limit wildlife access and the mining pit would be filled with water to create a pit lake (BLM 2023a p. H-18). Such actions would lead to enduring habitat loss, rather than true reclamation to pre-mining conditions. The DSEIS also notes that “if not economical to remove or sell at closure, mobile or stationary equipment would be stripped of electronics and batteries, and fluids drained and placed in an approved landfill for final disposal” (BLM 2023a p. H-18). The lack of an economic incentive to remove all materials taken to a site for road development or mining should not be considered of sufficient importance to justify their lack of removal. Instead, BLM should require that all materials brought into a site within the project area or associated mines be removed after the project is completed in support of more full restoration and reclamation.

Proposed mitigation measures

The DSEIS states that AIDEA proposes to adopt the wildlife interaction protocols used on the Delong Mountain Transportation System (Red Dog Road) for the Ambler Road (BLM 2023a p. 2-9, 2-18). The Working Group is concerned about the effectiveness of these proposed protocols. Both scientific studies (Wilson et al. 2016) and subsequent visualizations of movements by collared WACH caribou near the Red Dog Road shared by the National Park Service at the Working Group’s annual meetings demonstrate altered movement behavior. Some animals delay crossing while others fail to cross the road entirely despite a wildlife interaction protocol and mitigation measures such as stopping vehicles while caribou

are nearby. It seems likely that such reactions would similarly be observed around the Ambler Road if a similar protocol is used or be even greater based on differences in topography and vegetation in the Ambler region. We urge BLM to heed the knowledge shared by Alaska Native communities that raises concerns about the differences in conditions between the two areas and their effects on caribou (e.g., BLM 2023a p. M-19). We also note that the proposed Ambler Road is about four times as long as the Red Dog Road, which may hinder the ability of caribou to parallel the road and eventually pass around it without crossing, as is sometimes observed with the Red Dog Road. Together, this potential for similar or greater impacts with the Ambler Road is of great concern for increasing impacts on the WACH and its users and make reliance on Red Dog mitigation measures questionable. This aligns with the DSEIS' own statement that the measures used for the Red Dog Road "are not very effective, and therefore behavioral disturbance, and displacement should be anticipated" if they are applied to the Ambler Road (BLM 2023a p. 3-138). The lack of a scientifically validated means of mitigating impacts to caribou reinforces the importance of BLM selecting the No Action Alternative to protect subsistence, caribou, and the habitat they rely upon.

Appendix N in the DSEIS describes several potential mitigation measures that could be adopted for the Ambler Road. While we urge BLM to select the No Action Alternative, making these mitigation measures unnecessary, if the project does proceed many of these proposed measures may be beneficial for caribou, habitat, and subsistence and should be strengthened and applied as requirements. Specific comments on proposed measures are included below:

1.1 General Measures

Potential Measure 4 states that AIDEA must notify the BLM Authorized Officer in writing 30 days before any temporary closure and 90 days before permanent closure and reclamation. This is reasonable for planned closures and will help ensure BLM oversight over closure activities and enforcement. However, as currently phrased the language of this measure could conflict with the ability of AIDEA to perform emergency closures, such as to shut down operations when caribou are present to reduce the likelihood of disturbance. It is unlikely this can be planned with a 30-day warning. The measure should be adopted with altered language that specifies that it applies to planned closures but is not intended to prevent emergency closures for safety reasons or to avoid disturbance to wildlife, subsistence, or other processes.

Potential Measure 7 states that AIDEA would not block or obstruct ingress or egress along existing roads, winter trails, or subsistence trails. Given the extreme importance of subsistence to communities across the state of Alaska, this is an important mitigation measure that should be adopted. In light of this importance, the exception allowing the Authorized Officer to approve blocking of trails or roads should be removed.

1.2 Reporting Requirements

Potential Measure 1 requires AIDEA to submit documentation of consultation with affected subsistence communities. It is important that such consultation occurs and requiring that documentation of this consultation be shared with BLM will allow BLM and other landowners oversight to ensure consultation is occurring. In addition to requiring that issues raised during consultation be reported, AIDEA should also be required to include a summary of how they intend to address the issues reported. This will improve the accountability of AIDEA to the concerns of subsistence communities. We also urge BLM to include a broad definition of what counts as “affected subsistence communities.” As is noted above and in the DSEIS, impacts on caribou at the project location will have consequences for communities across the range of the WACH who rely on caribou for subsistence and other uses. It should be specified that all of these communities have the opportunity to engage in consultation if desired by the community. With the modifications described, this important mitigation measure should be adopted in the FSEIS.

1.4 General Completion of Use (Restoration/Reclamation)

Potential Measure 1 requires removal of all improvements or equipment upon completion of use. This is important and should be adopted, however the exception to leave items approved by the Authorized Officer should be removed. As described above, leaving any items on the landscape is a concern and should not be permitted so that habitat can be restored to the maximum extent possible and disturbance of wildlife and subsistence users minimized. In addition, the standard for the condition of restoration currently is described as “to a condition that is approved in writing by the Authorized Officer” (BLM 2023a p. N-6). This is too vague to provide reassurance that restoration will be adequate. The statement of effectiveness for this mitigation measure acknowledges that “The plan for what is being removed and how it would be removed would be important in ensuring the effectiveness of this stipulation” (BLM 2023a p. N-7). This reinforces why a reclamation plan needs to be clearly defined and reviewed by appropriate parties prior to approval of the ROW. This review should be conducted by agency staff, independent scientists, and Indigenous Knowledge holders from subsistence communities that will be affected by the project. The plan should also include a procedure for further review and updates over time as conditions change and technology improves.

Potential Measure 2 involves removing fill at the completion of the project and restoring the original contours of the landscape to return the land to its original condition for fish and wildlife. We agree that this is a worthy goal and should be adopted, though we also concur with the DSEIS’ statement that this is likely to be only partially effective. The lack of a clear ability to restore arctic environments reinforces the importance of BLM selecting the No Action Alternative.

Potential Measure 4 is related to our recommendations for measure 1 and requires AIDEA to submit a closure and reclamation plan for approval before construction is authorized, along with

updates every 5 years and at key project stages. This is very important and should be adopted. It should also be strengthened to incorporate the independent review described above as part of the approval process.

The DSEIS summary of effectiveness for this section focuses primarily on the effectiveness of the proposed measures in keeping BLM informed about AIDEA's plans. This is important but insufficient. To increase the likelihood of effective restoration, it is important that the measures taken by AIDEA have a reasonable chance of success. Review and approval of the plan by qualified subsistence users, scientists, and agency staff, in addition to the Authorized Officer, will increase the likelihood of restoration success.

2 Alternatives

Potential Measure 2 requires AIDEA to provide financial guarantees in the form of bonds or other such instruments to cover the full cost of construction, operation, maintenance, and termination/reclamation. This is a very important metric that should be required to ensure that project phases, especially termination and reclamation, have the funding needed to succeed. However, this will only be effective to the extent that bond amounts are sufficient to cover the expected expenses. This requirement should be updated to specify amounts necessary, or a process to determine those amounts, based on similar projects in similar environments. Amounts required should account for expected inflation and should include some margin for error to ensure future costs are not underestimated.

3.2.6 Acoustical Environment (Noise)

Potential Measure 1 requires AIDEA to provide a Noise Management Plan for land manager approval that outlines noise reduction methods and features to be used. This is an important measure for reducing environmental impacts, such as disruption of caribou. It should be adopted with the addition that the proposed plan be reviewed and approved by an expert group comprising agency staff, independent scientists, and subsistence users from the communities affected by the project.

3.3.2 Wildlife – General

Potential Measure 1 requires development and implementation of a Comprehensive Wildlife Interaction and Avoidance Plan “using the best available science and Indigenous Knowledge” (BLM 2023a p. N-30). This is an important measure that should be adopted. We were especially pleased to see a broader group specified for development of the plan prior to approval by the Authorized Officer. We urge that this list be expanded to also include independent scientists with relevant knowledge of the species for which policies are being developed and that the Subsistence Advisory Committee mentioned here include representatives from across the communities affected by the project. We also appreciated the stipulation for reviewing the plan

at least every 5 years. As conditions continue to change, observations are gathered from subsistence hunters and others out on the land, and new scientific information is acquired, it is important that wildlife plans be updated.

Potential Measure 2 is similar to measure 1 but focused around a Comprehensive Fish and Wildlife Monitoring Plan. We are supportive of this measure, with the improvements mentioned for measure 1. Furthermore, the mitigation plan needs to not just focus on habitat but also on other key wildlife processes such as movement and resource selection. The plan also should specify funding mechanisms to support such monitoring. The recent Arctic National Wildlife Refuge Coastal Plain Leasing DSEIS proposed creation of an Adaptive Management Plan with funding given by the project proponent to the authorized agencies who would be responsible for carrying out or hiring others to conduct the monitoring (BLM 2023b). A similar plan would be useful for the Ambler Road with monitoring funded by AIDEA, with funding provided to the Alaska Department of Fish & Game and National Park Service who would be responsible for conducting monitoring or hiring other suitable groups to conduct monitoring. Potential Measure 2 also specifies that the monitoring plan will include a point of contact for communities and managers seeking and sharing information on fish and wildlife conditions in areas affected by the project. We request that this list of contacts include representatives of all caribou study communities and that the Working Group also be included in these communications.

Potential Measure 7 requires AIDEA to work with land managers and wildlife agencies to identify construction timing windows to protect wildlife. This may be beneficial but further information is needed about what kind of requirements will be included here and what factors will be considered to identify when timing windows will or will not occur. We also request that the group that identifies these timing windows be expanded to include subsistence users from communities affected by the project, including across the full WACH range, and independent scientists with relevant knowledge.

We affirm the DSEIS' recognition that even if all the proposed wildlife mitigation measures were implemented, these would only be "partially effective at reducing impacts to wildlife as a result of construction and operation of the Ambler Road. It is not possible to fully avoid or mitigate the impacts of the road to wildlife" (BLM 2023a p. N-32). This again reinforces the importance of BLM selecting the No Action Alternative in the FSEIS.

3.3.5 Mammals

Potential Measure 1 states that during calving and major migration periods AIDEA activities on BLM-managed lands may be restricted by the Authorized Officer with written notice. While restricting activities to protect sensitive wildlife is important, it is likely to be minimally effective for caribou if it only is applied to BLM-managed lands since much of the area used by caribou lies outside these areas. The Working Group recognizes that BLM only has authority over the lands under its purview but strongly urges BLM to work with other landowners to apply the

requirements of this and the other proposed mitigation measures across the entire Ambler Road area. We also note that currently the potential to restrict activities under this mitigation measure is restricted to migration and calving periods. As the DSEIS makes clear, winter is also an important period for caribou and is a season where there may be substantial overlap between caribou winter range and the proposed road. This measure should be rephrased to apply whenever caribou are present. Finally, greater specificity is needed for this mitigation measure to clarify how the Authorized Officer will determine if cessation of activities is needed and how long this should last. It should also be clarified that written notice can include electronic communication. Such rapid measures may be needed to allow rapid response to caribou movements or other changing conditions.

Potential Measure 2 gives wildlife the right of way on the Ambler Road and requires vehicles to slow down or stop to permit wildlife crossing of the road. It also allows the Authorized Officer to require temporary cessation of traffic during known caribou migration. This is very important and should be adopted. However, additional description is needed about how caribou will be monitored and at what spatial and temporal scales, as well as what the thresholds will be for group size and proximity to trigger road closures and for traffic to be restarted. Indigenous Knowledge and scientific observations indicate that caribou do not have to be next to a road to be affected by it. Rather, sounds, smells, and social cues may all affect behavioral responses, allowing them to occur at far greater distances than suggested by visual lines of sight. As is noted above for measure 1, if caribou encounter the road at other seasons (e.g., winter) it is important that this measure also be applied to allow temporary stopping of traffic. We appreciate the requirement to share data on road closures with state and federal agencies and ask that it also be made available to affected communities, scientists, and the public.

Potential Measure 8 prohibits hunting, fishing, shooting, and trapping by all AIDEA agents or employees, along with any contractors, agents, or employees of entities allowed commercial use of the road. This is incredibly important to adopt as it has been stated that this will occur throughout the Ambler EIS process. Potential for increased hunting access and competition between hunters is something the Working Group has consistently raised in our scoping and DEIS comments as a concern. This measure should help reduce these concerns, though potential for illegal trespass and hunting persists, as acknowledged by the DSEIS.

3.4.7 Subsistence Uses and Resources

Potential Measure 2 requires AIDEA to “consult directly and regularly with affected subsistence communities, and ensure that affected communities are represented on the subsistence working group” (BLM 2023a p. N-47). Ensuring avenues for AIDEA to hear from and respond to knowledge and concerns of affected communities is crucial and should be adopted in the FSEIS. We again emphasize that this group should include representatives of all caribou study communities, since the road and associated mines may affect caribou upon which they rely. We

also request that the Working Group be kept apprised of consultation and communication opportunities.

Potential Measure 4 includes a suite of activities that AIDEA will undertake to reduce detrimental impacts to subsistence. While we agree with the DSEIS that “project activities, particularly during the construction process, would affect subsistence activities despite these measures” (BLM 2023a p. N-49) we nonetheless recommend their adoption as a step towards reducing subsistence impacts.

Conclusion

We appreciate the opportunity to provide these comments on the Ambler Road DSEIS. Throughout the DSEIS there are repeated warnings that impacts to caribou, their habitat, and the people that rely upon them are expected if the road is allowed to proceed. It is also clear that these impacts may have population-level consequences and that they may persist for long periods of time, or in perpetuity. We cannot overstate how crucial it is that BLM heed these warnings. In light of all the concerns and issues raised above we again reiterate the strong request that BLM select the No Action Alternative and not proceed with permitting the Ambler Road. Thank you for your consideration.

On behalf of the Working Group,



Vern Cleveland, Sr., Chair

cc:

Steve Cohn, Alaska State Director, Bureau of Land Management
Western Arctic Caribou Herd Working Group Members & Alternates

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BLM's decision

In April 2024, BLM released a Final SEIS, which stated that the No Action Alternative – not permitting the Ambler Road – was BLM's preferred alternative.

The Record of Decision was finalized in June 2024. It confirmed selection of the No Action Alternative and denied the Alaska Industrial Development and Export Authority (AIDEA) application for a right-of-way to build the road across BLM lands.

All SEIS documents are available on the [BLM eplanning webpage](#).

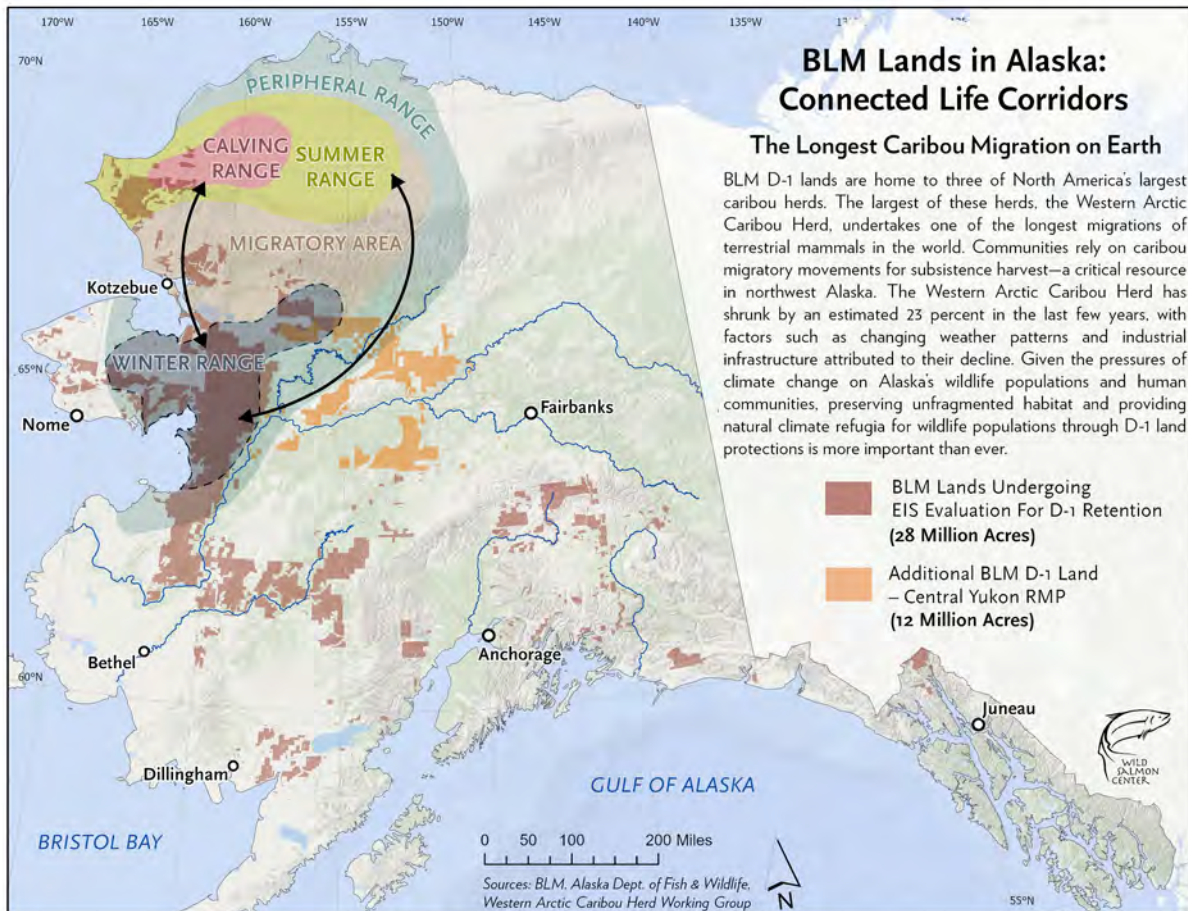
Next steps

Based on the results of the 2024 presidential election and the incoming Administration's strong emphasis on resource development, it is likely permitting of the Ambler Road will continue to be raised in the future. The Resource Development Committee will continue to monitor the situation for opportunities for Working Group involvement and comment.

2) D1 Land Withdrawal

The Alaska Native Claims Settlement Act (ANCSA) withdrew nearly 50 million acres of land from mineral and energy development to allow protection for the public interest. These, “D-1 lands” are managed by the Bureau of Land Management (BLM) and shown on the map below. The lands being considered (shown in darker brown) overlap a substantial portion of the WACH annual range, including portions of the calving grounds, summer range, insect relief habitat, migratory areas, and winter range. A Draft Environmental Impact Statement (EIS) was released in December 2023, which considered the effects of opening some, or all, of nearly 28 million acres of protected D-1 lands for extractive industrial development.

At the 2023 Annual Meeting, the Working Group voted to submit comments asking BLM to retain D1 land withdrawals and the protections they provide for caribou, habitat, and subsistence. These were submitted in February 2024 and a copy is included on the following pages.



Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

February 5, 2024

Racheal Jones
Bureau of Land Management
BLM Alaska State Office
222 West 7th Avenue #13
Anchorage, AK 99513

RE: ANCSA 17(d)(1) Withdrawals Draft EIS

Dear Ms. Jones,

On behalf of the Western Arctic Caribou Herd Working Group (Working Group) I submit the following comments on the Bureau of Land Management (BLM) Draft Environmental Impact Statement (DEIS) for Alaska Native Claims Settlement Act 17(d)(1) Withdrawals (D1 Withdrawals). The Working Group is a permanent organization of stakeholders that works to ensure conservation of the Western Arctic Caribou Herd (WACH) and to maintain traditional and other uses now and into the future. The Working Group consists of Alaska Native subsistence users from communities within the range of the herd, other Alaskan hunters, guides, transporters, conservationists, and reindeer herders. Since its formation in 1997, the Working Group has submitted numerous advisory recommendations to government agencies, regulatory boards, and other bodies to support decisions that will ensure the long-term conservation of the WACH.

The D1 Withdrawals being considered in the DEIS overlap extensively with the range of the WACH. Conservation of the WACH and the ecosystem on which it depends is a core role of the Working Group that we take very seriously. In light of this, and especially of the sharp decline seen in the WACH over recent decades, we are concerned about anything that may increase detrimental impacts on the herd or its users. **We voted at our annual meeting in December 2023 to retain D1 Withdrawals and the protections they provide for caribou, habitat, and subsistence. We ask that BLM select Alternative A and retain the D1 Withdrawal protections in its FEIS and ROD.** Additional comments and specific recommendations for improvement of the EIS are included below.

WACH status and the D1 Withdrawals

For many years, the WACH was the largest caribou herd in Alaska, with nearly 500,000 animals at its peak in the early 2000s. This large, wide-ranging herd provides a crucial subsistence resource to residents of approximately forty remote communities spread across the range of the WACH, as well as many others who rely on caribou for their livelihoods or other reasons. The herd also plays an important role in a healthy environment that supports many other species and natural processes. Unfortunately,

for about two decades the herd has been in serious decline, as the DEIS acknowledges (e.g., p.3-171). The 2023 count of 152,000 represents the lowest numbers since the 1970s. In light of this, for the last three years the Working Group recommended that the WACH be managed at a “preservative, declining” level. This includes limiting harvest of the herd, preventing loss or degradation of seasonal habitat, and mitigating human impacts. We appreciate recognition of this management recommendation in the DEIS (p.3-244) and urge BLM to heed it in making their final decision on maintaining D1 Withdrawals.

There are very real consequences for subsistence hunters and other people in the WACH range of the consistent long-term decline of the herd. In 2022 and 2023, the Working Group recommended a reduced subsistence harvest limit across the range of the WACH of four caribou per year, only one of which may be a female, as well as a pause on all non-resident harvest. This is a sharp decrease from the current limit of five caribou per day. It is not a recommendation we made lightly, knowing that it will have impacts on those who most rely upon caribou. However, considering persistent declines we felt compelled to act in alignment with the Working Group’s Cooperative Management Plan. When the people we represent are being asked to reduce their use of the WACH because of low herd size, taking an action that would reduce Federal subsistence priority and potentially allow increased development that the DEIS admits may impact caribou habitat use, population size, availability for subsistence, and likelihood of recovery is ill advised. The DEIS acknowledges that between 65-119 communities, many classified as “environmental justice populations” in the DEIS, could be affected by loss of Federal subsistence priority under Alternatives B-D, affecting between 50,000 – over 1 million acres of land (p.2-12). This includes many of the communities represented by the Working Group. We urge that D1 Withdrawals on these lands be maintained.

Concerning aspects of D1 Withdrawal Revocation

The DEIS documents multiple detrimental impacts that may occur if D1 Withdrawals are revoked. Several of these are especially concerning to the Working Group, such as the DEIS’ admission that if D1 Withdrawals are revoked “potential impacts from development could lower herd growth for herds that are already at low levels” (p.3-249). With low population numbers and a decreasing trend, the Working Group is doing all it can to encourage actions that improve the chance of population recovery for the WACH. We urge BLM to join in these efforts by maintaining D1 Withdrawal protections.

The DEIS acknowledges that the potential for development is likely to increase if D1 Withdrawals are revoked (p.3-172), and that the impacts from this are expected to increase in Alternatives that make more acreage of D1 Withdrawals available (p.3-182). This is especially concerning for the Kobuk-Seward Peninsula Planning Area, which overlaps much of the WACH range. This region has the greatest potential for future mining projects (Appendix C, p.63), giving it the greatest potential for cumulative impacts from mining accentuated by D1 Withdrawal revocations on subsistence users. The DEIS’ recognition that infrastructure “could cause substantial changes in range distribution” for caribou and that the combination of increased development and revocation of D1 Withdrawals “would contribute to changes in caribou migration, distribution, and abundance, with resulting impacts on subsistence resource availability to communities that use these resources” (Appendix C, p.64) is of grave concern for the Working Group and reinforces the importance of maintaining D1 Withdrawals.

We also are concerned about the DEIS' acknowledgement that increasing the amount of land under management of the State of Alaska by revoking D1 Withdrawals could increase non-local hunting (p.3-243). Though not acknowledged in the DEIS, this may have the effect of concentrating subsistence harvest as local harvesters seek to avoid non-local hunters. The Working Group has heard concerns from members and others in the communities we represent about user conflict between local and non-local hunters and does not want to see such incidents increase. Similarly, one of the challenges with D1 Withdrawal revocation mentioned in the DEIS is the potential for changes in hunting regulations in lands transferred out of Federal management to lead to increased confusion and potential avoidance of areas with recent changes (p.3-171). The Working Group has consistently advocated for aligning hunting regulations where possible to reduce confusion, along with clear communication. The DEIS acknowledges that differences in subsistence management between Federal and State lands can affect harvester success (Appendix C, p.19). We are concerned about increased conflict, confusion, and reduced subsistence harvests if D1 Withdrawals are revoked.

Areas for improvement in the DEIS

In addition to the concerns listed above, there are several aspects in which improvement is needed in the DEIS. For example, the DEIS describes millions of acres of the WACH annual range that would be opened up under revocation, including tens of thousands of acres overlapping priority conveyances and lands likely to be developed (e.g., Table 2.7-4, p. 2-16; Table 3.15-4, p.3-248). These are sobering statistics but still do not capture the full magnitude of the importance of those lands. The DEIS quantifies impact for caribou as the acres of annual range in the focused analysis area (p.3-240). However, this treats all acres as equal, ignoring seasonal differences in critical habitat. The D1 Withdrawals overlap areas of calving habitat, insect relief, summer range, winter range, and migratory areas for the WACH. As the DEIS acknowledges (e.g., p.3-187), the calving grounds are crucial for caribou and the calving period is a time of heightened sensitivity to disturbance. However, this is not connected in the DEIS to overlap of D1 Withdrawals to calving grounds and other key seasonal ranges, nor are such seasonal ranges mapped in the DEIS. We are very concerned about any revocation of D1 Withdrawals on the calving grounds. Similarly, insect relief and winter habitat are important for caribou, allowing them to escape detrimental effects and access important forage resources at key times throughout the year. With the WACH already in decline, it is extra important to take proactive measures to protect habitat and reduce potential impacts to caribou. Greater attention should be given in the FEIS to overlap of D1 Withdrawals with caribou seasonal ranges and these should be clearly depicted in maps.

The DEIS notes that the subsistence use area for the village of Hughes does not overlap any of the D1 Withdrawals (p.3-168). Hughes is one of the communities represented on the Working Group, reflective of its reliance upon and valuing of the WACH. We emphasize that communities like Hughes may feel the impacts of opening of D1 Withdrawals beyond areas of spatial overlap if the species they rely upon, like migratory caribou, are affected in one part of their annual range and then travel to the communities' subsistence use areas. This is acknowledged in Appendix C (p.22, 25) and it is important that language consistently reflects this throughout the EIS. Impacts to all communities within the range of mobile species like caribou should be carefully accounted for in the FEIS.

The DEIS cites the WACH population size at 164,000 caribou (p.3-241). This likely was the most recent count when the document was written but the 2023 photocensus conducted by the Alaska Department of Fish & Game indicated continued decline, with the new 2023 count at 152,000 caribou. This number should be updated in the FEIS to reflect the ongoing decline in the herd, which has implications for the effects of proposed D1 Withdrawal revocation.

The DEIS states that although Alternative C would make more of the southern portion of the WACH winter range available this area has not been heavily used in recent years (p.3-246). While it is good to be aware of recent patterns of caribou distribution and habitat use, effective management over the timescales relevant to a decision such as revoking D1 Withdrawals necessitates consideration of historic patterns of caribou habitat use. Research has shown that as herd size changes caribou may expand or contract their range use accordingly (e.g., Taillon et al. 2012, Virgl et al. 2017). While recent declines in the WACH may lead to a smaller overall area of habitat use, it is incumbent on BLM to make decisions that will be robust in future periods of both herd decline and growth. The potential impacts of revoking D1 Withdrawals and of development will be of long duration, lasting decades (e.g., p.3-12). It is crucial that the decisions made be designed to afford population protection at both high and low population levels. The best way to accomplish this is by retaining all D1 Withdrawals.

Conclusion

In summary, we feel the costs of revoking D1 Withdrawals far exceed their benefits. While the Working Group has discussed the potential benefits of increased opportunities for goods to be shipped into communities via infrastructure, we also are concerned by published studies, such as those cited in the DEIS, that have found substantially lower subsistence harvests in road-connected communities compared to those not connected by roads (p.3-173). We also affirm the DEIS' statement that "impacts can occur even when there is a low likelihood of development if a very large amount of land is opened" (p.3-12). These concerns reinforce our call for all D1 Withdrawals to be retained.

We appreciate the opportunity to provide these comments on the D1 Withdrawals. In light of the concerns and issues raised above we again reiterate the strong request that BLM select Alternative A and maintain protections for existing D1 Withdrawals. Thank you for your consideration.

Sincerely and on behalf of the Working Group,



Vern Cleveland, Sr., Chair
Western Arctic Caribou Herd Working Group

cc:

Steve Cohn, Alaska State Director, Bureau of Land Management
Western Arctic Caribou Herd Working Group Members & Alternates

References

Taillon J, Festa-Bianchet M, Côté SD. 2012. Shifting targets in the tundra: Protection of migratory caribou calving grounds must account for spatial changes over time. *Biological Conservation* 147, 163-173.

Virgl JA, Rettie WJ, Coulton DW. 2017. Spatial and temporal changes in seasonal range attributes in a declining barren-ground caribou herd. *Rangifer* 37(1), 31-46.

BLM's decision

In July 2024, a Final EIS was released that considered various alternatives ranging from keeping all D1 lands withdrawn from development to opening them all for mineral and energy leasing.

A Record of Decision was released in August 2024, which concluded that the D1 Withdrawals “continue to be necessary to protect the public interest” and so retained all D1 Withdrawals being considered. This position aligns with the Working Group’s request in the comments above.

To review any of these documents, please visit the [BLM eplanning page for D2 Withdrawals](#).

Next steps

It is unknown whether the incoming Administration will again seek to open D1 lands for development. If additional opportunities arise for Working Group engagement on this topic the Resource Development Committee will let us know.

3) NPR-A Special Areas Rulemaking

The National Petroleum Reserve – Alaska (NPR-A) contains a large amount of important habitat for the WACH, including the majority of its calving grounds. Management of land use and development activities within the NPR-A is governed by an Integrated Activity Plan (IAP) that protects some areas while making others available for oil and gas leasing and development. The strongest protections for wildlife, habitat, and subsistence occur within designated “Special Areas,” including the Utukok River Uplands Special Area that protects much of the WACH calving grounds and the Teshekpuk Lake Special Area that protects much of the calving grounds for the Teshekpuk Caribou Herd.

In September 2023, the Bureau of Land Management (BLM) asked for comments on a proposed new rule to govern management of surface resources, like caribou, and Special Areas in the NPR-A. The Working Group submitted comments that affirmed aspects that enhance protection of caribou and subsistence and made requests to better strengthen protections, including by raising the northern boundary of calving area protections for the WACH. These comments were shared at last year’s annual meeting.

In April 2024, BLM released its final NPR-A Rule. This increased protections for caribou and other surface resources across the entire NPR-A, and especially within Special Areas. It also set up a process for identifying new Special Areas or expanding existing ones. This led to a comment period that ran through September 2024. The Working Group did not submit comments.

4) Teshekpuk Lake Conservation Right of Way

The Willow project would expand infrastructure in the northeastern National Petroleum Reserve – Alaska (NPR-A). This is the farthest west oil and gas infrastructure that is currently proposed within the NPR-A and comes up to the edge of the Teshekpuk Lake Special Area, which protects critical calving, post-calving, and insect relief habitat for the Teshekpuk Caribou Herd. After undergoing multiple revisions and legal battles, the Willow Project was approved by BLM in March 2023. The approval included three drill sites, associated infrastructure including a central processing facility, roads linking to existing infrastructure, a new gravel mine, and an airstrip. It also included a mitigation measure that required BLM to develop compensatory mitigation to protect the Teshekpuk Caribou Herd and its key habitat.

In mid-November 2024, BLM announced the Teshekpuk Lake Conservation Right-of-Way to implement that mitigation measure. It is a first-of-its-kind right-of-way agreement, made between BLM and Nuiqsut Trilateral, Inc. (NTI), a non-profit corporation consisting of the Native Village of Nuiqsut, Kuukpik Corporation, and the City of Nuiqsut. When finalized, the right-of-way will be held by NTI and will prohibit oil and gas leasing and infrastructure within about 1 million acres around Teshekpuk Lake (see map on next page). The goal of this conservation right-of-way is to provide long-term protection to caribou, habitat, and subsistence.

BLM is working with NTI to finalize the right-of-way agreement. There are currently not opportunities for public comment. The Working Group did not comment on any of the previous Willow Environmental Impact Statement decisions.

For additional details please see the [BLM eplanning page](#).



Proposed Teshekpuk Lake Conservation Right of Way from a [BLM factsheet](#).

5) Graphite One Mine

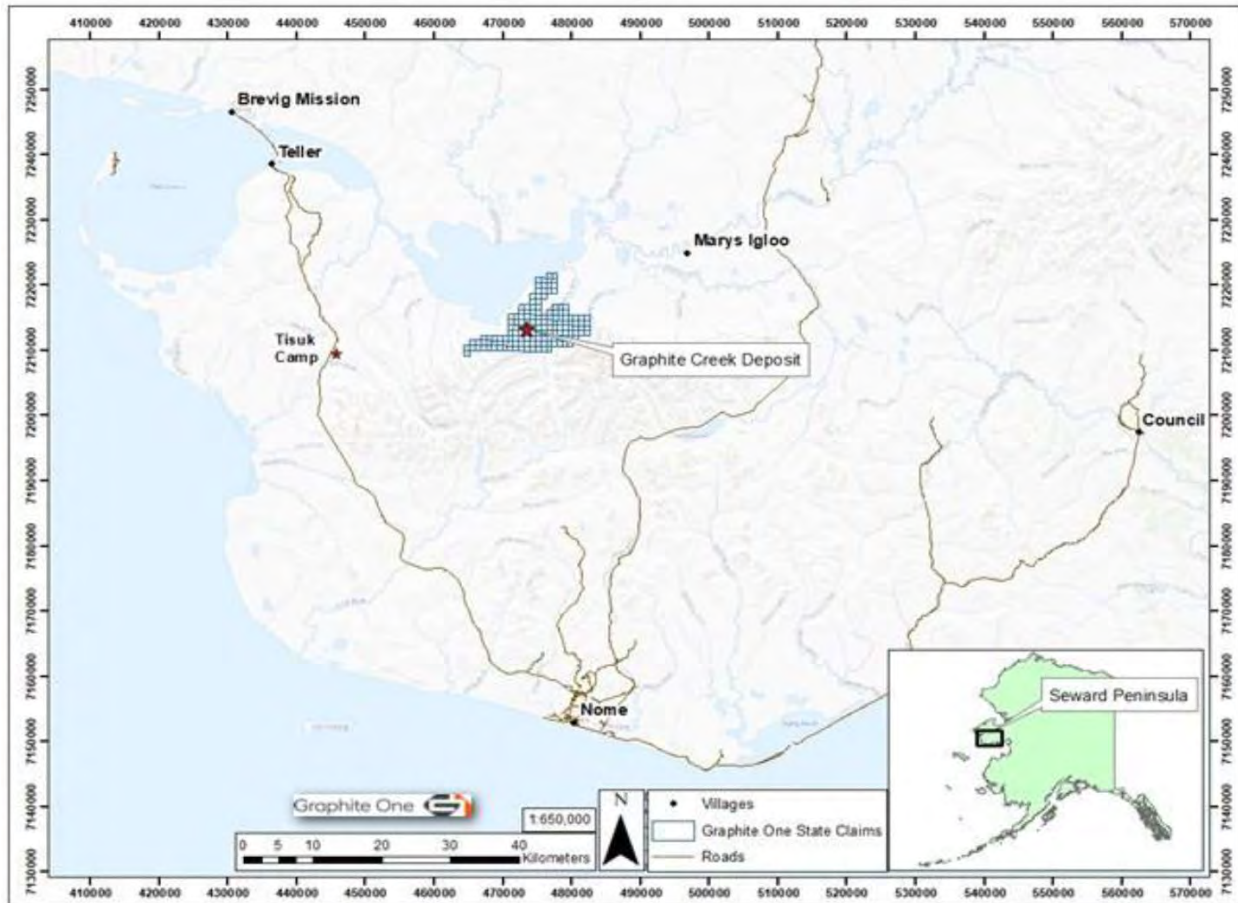


Figure 1-1 from the Graphite One Project [Preliminary Feasibility Study Technical Report](#)

The Graphite One project is a proposed graphite mine on the Seward Peninsula between Brevig Mission, Teller, and Nome (see map above).

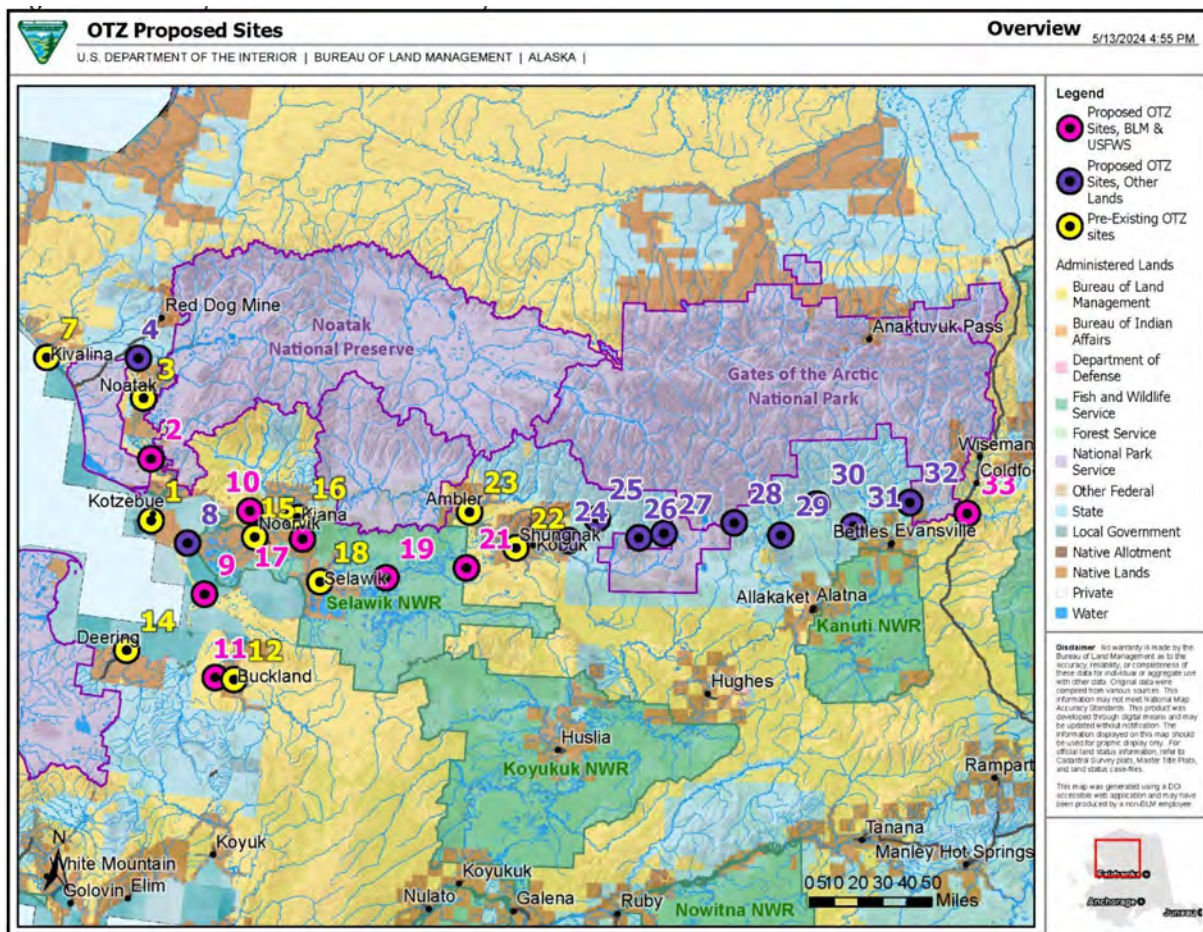
Graphite One [continues to proceed with exploration](#) and hope to complete a feasibility study by the end of this year that will indicate whether the mine would be profitable and could move forward with development. In the meantime, they are [pursuing funding](#) and [signed an agreement](#) in October 2024 with a Chinese company to obtain licensing and expertise that would help them develop their manufacturing plant in Ohio.

If Graphite One does apply for permits to develop this will likely lead to opportunities for comment. The Resource Development Committee will continue to monitor this project.

6) OTZ Telephone Broadband Buildout Project

OTZ Telephone Cooperative proposed to build a series of microwave antennae tower communication sites to provide broadband internet between the Northwest Arctic Borough and the Dalton Highway. This could include up to 30 towers (see the colored circles on the map below).

The Bureau of Land Management and US Fish and Wildlife Service released a preliminary Environmental Assessment (EA) in June 2024 that analyzes impacts of the towers on Federally managed land (shown in pink below). This was followed by a 30-day comment period, but the Working Group did not provide comments. As of printing, the final EA has not been released for this project.



Proposed tower locations map from [Preliminary EA document](#).

7) Anarraaq – Aktigiruaq Mining Exploration

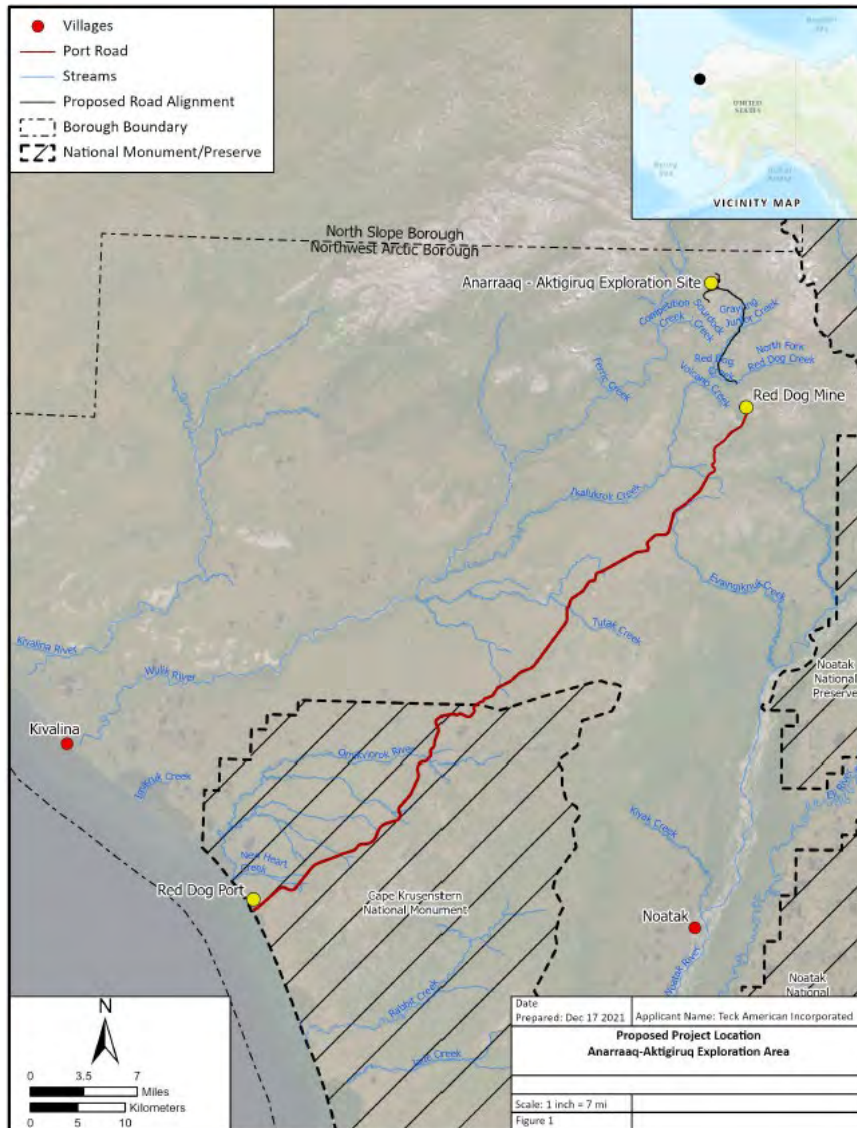


Fig. 1 from the US Army Corps of Engineers [Public Notice of Application for Permit](#) POA-2018-00075. 2022-03-10.

The Anarraaq-Aktigiruaq mining exploration project would evaluate the potential of new mineral deposits north of the current Red Dog Mine (see map above). Current mining at Red Dog is set to run out in 2031 and the new exploration would inform whether mining could continue at the new sites. The Working Group commented multiple times on the Teck America Inc. proposal but has not taken a stance on the project.

Last week the Army Corps of Engineers approved the permit to allow Teck to build a little over 12 miles of roads plus other infrastructure needed to reach the project.

Compiling Knowledge and Long-term Observations



FATE of the
CARIBOU
PROJECT

Ophélie Couriot & Anna Brose

University of Alaska Fairbanks

State University of New York

Western Arctic Caribou Herd
Working Group
Anchorage, Dec 2024

Investigating threats to caribou in a rapidly changing Arctic



Who we are



Dr. Elie Gurarie
Assistant Professor
Fate of the Caribou Project



Dr. Ophélie Couriot
Research Associate
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Anna Brose
Communications Manager
Fate of the Caribou Project



Chloe Beaupré
PhD Student
Fate of the Caribou Project

Research involving WAH

esa

ECOSPHERE

RESEARCH ARTICLE **OPEN ACCESS**

Evidence for an Adaptive, Large-Scale Range Shift in a Long-Distance Terrestrial Migrant

Eliezer Gurarie¹ | Chloé Beaudré¹ | Ophélie Couriot¹ | Matthew D. Cameron² | William F. Fagan³ | Kyle Joly²

ARTICLE
Macrosystems Ecology

ECOSPHERE

Continental synchrony and local responses: Climatic effects on spatiotemporal patterns of calving in a social ungulate

Ophélie H. Couriot^{1,2,3} | Matthew D. Cameron⁴ | Kyle Joly⁵ | Jan Adamczewski³ | Mitch W. Campbell⁶ | Tracy Davison⁷ | Anne Gunn^{2,8} | Alicia P. Kelly⁹ | Mathieu Leblond¹⁰ | Judy Williams⁵ | William F. Fagan^{1,2} | Anna Brose² | Eliezer Gurarie^{1,2}



Communication
Behavioral, Physiological, Demographic and Ecological Impacts of Hematophagous and Endoparasitic Insects on an Arctic Ungulate

Kyle Joly^{1,10}, Ophélie Couriot^{2,3}, Matthew D. Cameron¹⁰ and Eliezer Gurarie¹

APPLICATION

For everything there is a season: Analysing periodic mortality patterns with the `cyclomort` R package

Eliezer Gurarie¹ | Peter R. Thompson^{1,2} | Alicia P. Kelly³ | Nicholas C. Larter⁴ | William F. Fagan¹ | Kyle Joly⁵

Tactical departures and strategic arrivals: Divergent effects of climate and weather on caribou spring migrations

ELIEZER GURARIE^{1,2,†} MARK HEBBLEWHITE² KYLE JOLY³ ALICIA P. KELLY⁴ JAN ADAMCZEWSKI⁵ SARAH C. DAVIDSON^{6,7} TRACY DAVISON⁸ ANNE GUNN² MICHAEL J. SUITOR¹⁰ WILLIAM F. FAGAN¹ AND NATALIE BOELMAN¹¹

Anim. Migr. 2021; 8:156–167

DE GRUYTER

Commentary

Kyle Joly^{*,} Anne Gunn, Steeve D. Côté, Manuela Panzacchi, Jan Adamczewski, Michael J. Sutor, Eliezer Gurarie

Caribou and reindeer migrations in the changing Arctic

ORIGINAL RESEARCH

Ecology and Evolution WILEY



Seasonal patterns of spatial fidelity and temporal consistency in the distribution and movements of a migratory ungulate

Kyle Joly¹ | Eliezer Gurarie² | D. Alexander Hansen³ | Matthew D. Cameron¹

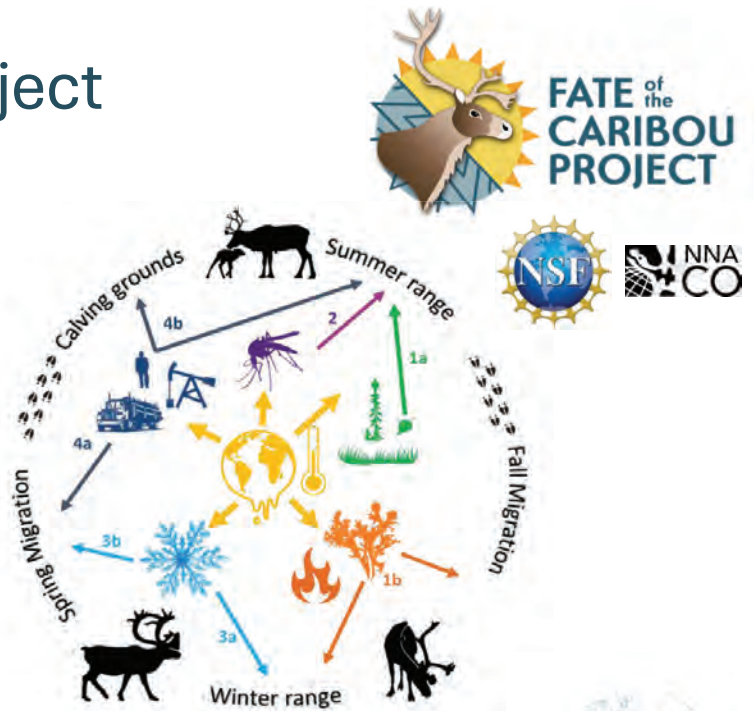
Corrected: Author Correction

OPEN Longest terrestrial migrations and movements around the world

Kyle Joly^{1†}, Eliezer Gurarie¹, Mathew S. Sorum¹, Petra Kaczensky^{2,3,4,5}, Matthew D. Cameron⁶, Andrew F. Jakes⁶, Bridget L. Borg⁷, Dejidd Nandintsetseg^{8,9}, J. Grant C. Hopcraft¹⁰, Bayarbaatar Buuveibaatar¹¹, Paul F. Jones¹², Thomas Mueller¹³, Chris Walzer^{5,13}, Kirk A. Olson¹¹, John C. Payne^{5,11,13}, Adiya Yadamsuren^{14,15} & Mark Hebblewhite¹⁶

Fate of the Caribou Project

- **Mission:** Serve the interests and lean on knowledge of communities, co-management boards and advisory councils to:
 - explore the impacts of a changing Arctic on caribou movements, space use, demography.
 - **share and learn.**



Knowledge of the Caribou

Goal

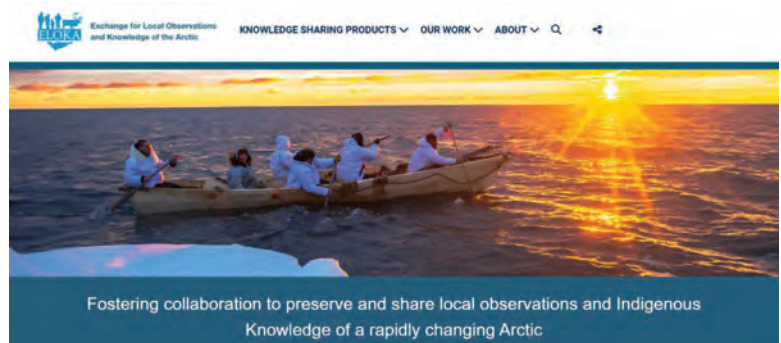
- Build an infrastructure to compile and share TEK observations of caribou from existing reports and documents
- Searchable, securely stored, extensible, access-controlled
- Useful to local communities and research partners
- Designed in collaboration with local communities (full partners)

Collaborating with ELOKA

Exchange for Local Observation and Knowledge of the Arctic

ELOKA partners with **Indigenous communities in the Arctic** to:

- Create online products that facilitate the **collection, preservation, exchange, and use** of **local observations** and **Indigenous Knowledge of the Arctic**.
- **Foster collaboration** between resident Arctic experts and visiting researchers,
- Provide **data management** and **user support** and **develops digital tools** for Indigenous Knowledge in collaboration with our partners.



Examples of ELOKA-supported projects

Seasonal Ice Zone Observing Network (SIZONet)

Local Observations
Seasonal Ice Zone Observing Network (SIZONet) and Alaska Arctic Observatory & Knowledge Hub (AAOKH)

Home Search Observations About Research methods Contacts

Search the observations catalog:


Search for: caribou

AND: All observers
AND: All villages
AND: All photo contributors
AND: All photo locations

Date range: 2006-04-01 to 2023-10-31



Search Reset

[View All](#)



The Local Observations Database is a collaboration between AAOKH and ELOKA, continuing the previous work of the SIZONet project, which ran from 2006 to 2015. This website is hosted by the National Snow and Ice Data Center.

Version 2.5.4

Search Results
Showing observations 1 - 20 of 249
20 per page Go to Page 1 Go
Sort by: Date (Latest-Oldest) Download CSV...

Date	Observer	Village	Additional elements noted (legend)
2024-08-15	Joe Leavitt	Utqiagvik (Barrow)	[Icons]
2024-08-08	Joe Leavitt	Utqiagvik (Barrow)	[Icons]
2024-07-01	Joe Leavitt	Utqiagvik (Barrow)	[Icons]
2024-06-25	Joe Leavitt	Utqiagvik (Barrow)	[Icons]
2024-06-19	Billy Adams	Utqiagvik (Barrow)	[Icons]
2024-06-11	Billy Adams	Utqiagvik (Barrow)	[Icons]
2024-04-07	Joe Leavitt	Utqiagvik (Barrow)	[Icons]
2024-03-19	Billy Adams	Utqiagvik (Barrow)	[Icons]
2024-03-03	Joe Leavitt	Utqiagvik (Barrow)	[Icons]


Observation Details

This observation has instructional or didactic value for students or other novices.

Observation source(s):

- Local knowledge/comment
- Email communication

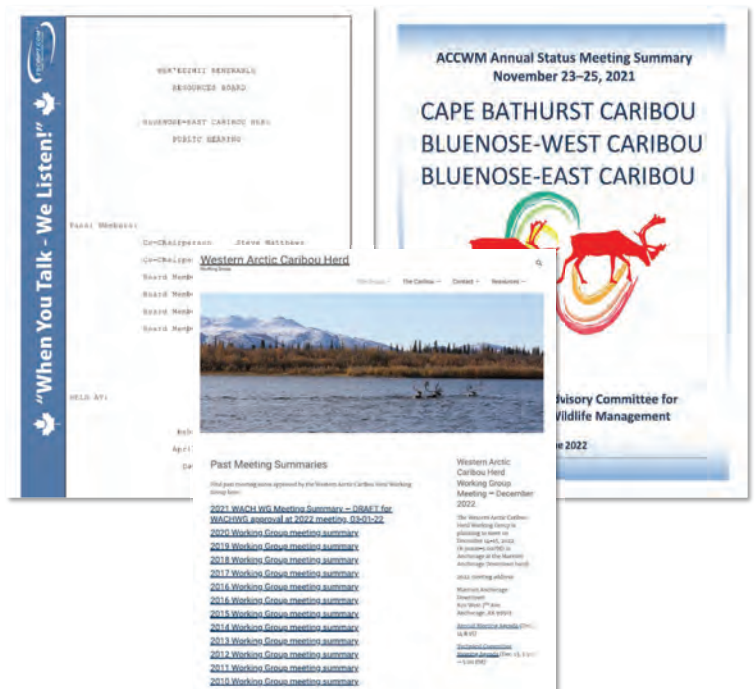
Multimedia



Game and Wildlife
Terrestrial Mammals:
Caribou (Sighted)

Compiling Knowledge of Caribou

- Annual caribou workshops and herd-specific working group meetings
- Observations provide local record and represent a significant time investment
- Important information within meeting notes is stored in reports (pdf's)
- Not searchable/usable for communities (or researchers)



ACCWM Annual Status Meeting Summary
November 23-25, 2021
CAPE BATHURST CARIBOU
BLUENOSE-WEST CARIBOU
BLUENOSE-EAST CARIBOU

Western Arctic Caribou Herd

Advisory Committee for Wildlife Management

“When You Talk – We Listen!”

Past Meeting Summaries

- 2021 WACH WG Meeting Summary – DRAFT for ACCMWS approval at 2022 meeting, 03-01-22
- 2020 Working Group meeting summary
- 2019 Working Group meeting summary
- 2018 Working Group meeting summary
- 2017 Working Group meeting summary
- 2016 Working Group meeting summary
- 2015 Working Group meeting summary
- 2014 Working Group meeting summary
- 2013 Working Group meeting summary
- 2012 Working Group meeting summary
- 2011 Working Group meeting summary
- 2010 Working Group meeting summary

Status

1. Entered data from WACH-WG 2011 roundtable for prototype
2. Secured supplementary funding support from NSF – including honoraria.
3. Working with ELOKA database designer (Brendan B.) and student (Jessica M.) to build website
4. Recruiting Ph.D./Master student to take reins



Brendan Billingsley



Jessica Morey



Jaylen Earls



Megan Cheshire

Knowledge of the Caribou database

The screenshot shows the top navigation bar of the 'Knowledge of Caribou Prototype' website. It includes a hamburger menu icon, the site name, and buttons for 'DOCUMENTS', 'NEW OBSERVATION', 'ACCOUNT', and 'LOGOUT'. Below the navigation bar is a text block describing the database's purpose: 'The Knowledge of the Caribou database compiles Traditional and Local Ecological Knowledge (TLEK) observations of caribou from existing reports and documents recorded at caribou workshops and herd-specific working group meetings. These observations provide an important local record of the past and present state of the Arctic environment and caribou, but participation and knowledge sharing in these meetings represents a significant time burden on local community members. The goal of this database is to alleviate repeated requests for information while compiling community-based observations of caribou ecology for posterity.' To the right of this text is the 'FATE OF CARIBOU PROJECT' logo. Below the text is a disclaimer: 'The knowledge documented here is the property of the knowledge holders and Peoples who shared it. We acknowledge and defend the sovereignty and right of self-determination of all Indigenous Peoples.' A search prompt 'Type a search phrase below to get started.' is centered. At the bottom is a search form with a 'Search term(s)' input field, 'From' and 'To' date pickers, and 'RESET' and 'SUBMIT' buttons.

Knowledge of the Caribou database

Knowledge of Caribou Prototype

DOCUMENTS NEW OBSERVATION ACCOUNT LOGOUT

Titles

- 2011 Western Arctic Caribou Herd Working Group (133)
- 2012 Western Arctic Caribou Herd Working Group (5)
- 2013 Western Arctic Caribou Herd Working Group (2)

Herd(s)

- Western Arctic (140)

Regions

- North Slope (47)
- Kotzebue (38)
- Koyukuk and Middle Yukon (26)
- Seward Peninsula (13)

Environment Keywords

- Bears (1)
- Wolves (1)

Caribou

- Abundance (47)
- Body condition (41)
- Migration (39)
- Changes in movement/Range shifts (25)
- Historic abundance (22)
- Bulls (11)
- Mortality (3)
- Cows (2)
- Distribution (1)
- Calves (1)

Showing 1 - 100 of 140 results for "caribou"

ID	Date	Region	Country	Actions
117	2011-12-01	Western Arctic	US - Alaska	EDIT DELETE
203	2011-12-01	Western Arctic	US - Alaska	EDIT DELETE
75	2011-12-01	Western Arctic	US - Alaska	EDIT DELETE
114	2011-12-01	Western Arctic	US - Alaska	EDIT DELETE
268	2011-12-30	Western Arctic	US - Alaska	EDIT DELETE
45	2011-12-01	Western Arctic	US - Alaska	EDIT DELETE
46	2011-12-01	Western Arctic	US - Alaska	EDIT DELETE
	2011-12-01	Western Arctic	US - Alaska	EDIT DELETE

Knowledge of the Caribou database

Document

2011 Western Arctic Caribou Herd Working Group

<https://westernarcticcaribou.net/wp-content/uploads/2017/01/wachwg-2011-meeting-summary-final.pdf>

Herd(s) Western Arctic

Country US - Alaska

Observation 117

Wainwright – caribou that come from the north are fatter than from the south. Caribou are healthy

Digital Page 50

Printed Page 47

Created 2022-12-23T20:01:09.000Z

Updated 2022-12-23T20:01:09.000Z

Reported 2011-12-01T00:00:00.000Z

Comments no concern about caribou conditions, their location is a shifted differently in comparison to usual times

Location Wainwright

Trend true

Caribou Body condition

EDIT DELETE

PDF

Western Arctic Caribou Herd Working Group
FINAL Meeting Summary - 2011
Attachment 7

(calves, males/females)? How does this compare with past years?

- Hunters out of Bettles saw fewer bulls
- In Barrow, depends on time of year. Last July, lots of bulls near town, but most all caribou were gone from vicinity of Barrow in August. However, there were many along the Chapp River area where lots of Barrow people have cabins, but there were few older bulls at that time, mostly young bulls. Just last week (late November 2011), caribou came closer to Barrow, coming from the west.
- In Wainwright, sometimes caribou are around and sometimes they are around Anaktuvuk in winter.
- In Anaktuvuk Pass, there have been fewer caribou moving through in both the spring and fall since the large fire in 2007.

8. If you harvested caribou, how did the meat and skins compare with past years? What did you notice about fat? Parasites?

- Wainwright – caribou that come from the north are fatter than from the south. Caribou are healthy.
- Barrow – Caribou have been fat in 2011, fat in July and still fat just last week.
- Anaktuvuk Pass – healthy fat caribou in August.
- Noted that weather has been cooler in 2011, so maybe less insect harassment and caribou had chance to build up fat.
- Noted that some caribou have external boils. Sometimes see caribou with lumps stuck to their ribs.

9. Were there any other notable changes regarding caribou compared with past years?

- Nothing on this topic.

Other Animals

10. What did you notice about bears and wolves in your area?

- Barrow – Bad bear behavior last several years; cabin damage. Lots of grizzlies last summer, wolf short near Barrow last week.
- Anaktuvuk Pass – lots of grizzlies and wolves.
- Bettles – hunters saw lots of wolves.

11. Have there been any notable changes regarding other animals in your area, compared with past years? (For example, new animals arriving in your area, or animals that you do not see much of any more, or changes in behavior or body condition)

- Nothing on this topic.

Other Comments – Nothing on this topic.

12. Is there anything else that you have seen this year that you would like to mention?

Evaluation of Questionnaire & Roundtable Format – Nothing on this topic.

13. Did you find this questionnaire helpful to your group's discussions?

14. Would you like to continue these discussions each year? In this same format?

Knowledge of the Caribou database

Knowledge of Caribou Prototype

DOCUMENTS NEW OBSERVATION ACCOUNT LOGOUT

Document
2011 Western Arctic Caribou Herd Working Group

Herd(s) Western Arctic
Country US - Alaska

Western Arctic Caribou Herd Working Group
FINAL Meeting Summary - 2011
Attachment 7

**WACH WG Meeting 2011
For Caribou Roundtable Discussion
Questionnaire on Observations about Caribou**

North Slope Region
Physical Environment

1. When did freeze-up occur? How does this compare with past years? How about the first snowfall? How about break-up?
 - At Anaktuvuk Pass, there wasn't much snow and freeze-up late October, had to be cautious on ice. Anaktuvuk Pass, not much snow, freeze-up began in mid- October.
 - In Howard Pass area (Northwest GMU 23), freeze-up later than usual. So warm that caribou weren't moving south.
 - Barrow - late freeze-up also.
2. What did you notice about snow depth and icing?
 - Not much snow at Wainwright. Late rain in September 2011 created an ice layer in snow in 2011-12. No ice layer at AIN in 2010-2011.
 - Barrow has different perspective on the winter weather - now using four-wheelers more and less snow machine and boat, it might be causing a problem deflecting caribou away from Barrow.
3. What were winds like in winter? In summer?
 - Wainwright noted that winds normal last winter, but unusual this fall (2011), now getting prevailing NE wind.
 - Anaktuvuk Pass winds normal last winter, switching between N and S, no storm in a long time.
4. Has there been any unusual weather this year? If so, what kind? (For example, strong winds, storms, much/little rain or snow, etc.)
 - "Everything is unusual." General trend over last 20 years is warmer.

Date specified?

Era/Year/Season
Fall 2011

Describe the time period in which the observation took place

Reporting Date
2011/12/12

Region
North Slope

Location
Wainwright

Location of the observation

CONTINUE BACK

Knowledge of the Caribou database

Knowledge of Caribou Prototype

DOCUMENTS NEW OBSERVATION ACCOUNT LOGOUT

Document
2011 Western Arctic Caribou Herd Working Group

Herd(s) Western Arctic
Country US - Alaska

Western Arctic Caribou Herd Working Group
FINAL Meeting Summary - 2011
Attachment 7

**WACH WG Meeting 2011
For Caribou Roundtable Discussion
Questionnaire on Observations about Caribou**

North Slope Region
Physical Environment

1. When did freeze-up occur? How does this compare with past years? How about the first snowfall? How about break-up?
 - At Anaktuvuk Pass, there wasn't much snow and freeze-up late October, had to be cautious on ice. Anaktuvuk Pass, not much snow, freeze-up began in mid- October.
 - In Howard Pass area (Northwest GMU 23), freeze-up later than usual. So warm that caribou weren't moving south.
 - Barrow - late freeze-up also.
2. What did you notice about snow depth and icing?
 - Not much snow at Wainwright. Late rain in September 2011 created an ice layer in snow in 2011-12. No ice layer at AIN in 2010-2011.
 - Barrow has different perspective on the winter weather - now using four-wheelers more and less snow machine and boat, it might be causing a problem deflecting caribou away from Barrow.
3. What were winds like in winter? In summer?
 - Wainwright noted that winds normal last winter, but unusual this fall (2011), now getting prevailing NE wind.
 - Anaktuvuk Pass winds normal last winter, switching between N and S, no storm in a long time.
4. Has there been any unusual weather this year? If so, what kind? (For example, strong winds, storms, much/little rain or snow, etc.)
 - "Everything is unusual." General trend over last 20 years is warmer.
5. Has there been anything else noteworthy this year regarding the air, rivers and lakes, or land? (For example, occurrence of fire that may have impacted caribou range, good/poor vegetation growth, late/early freeze, erosion, etc.)
 - Nothing on this topic.

Caribou

6. When were caribou present in your area? When did they first arrive? When were they last seen? How does this compare with past years?
 - Can't see caribou on North Slope at any time of the year.
 - In Wainwright, saw caribou in fall coming from the south. They'd also see them from other directions and sometimes they stay through winter.
 - In Upper Wainwright, a lot of caribou there in mid-August in very large groups. In September, only in small groups.
 - Bethel haven't seen very many caribou coming through for several years.
7. How many caribou were in your area? What was the composition of the herd like

Quote: Wainwright noted that winds normal last winter, but unusual this fall (2011), now getting prevailing NE wind.

Observation is part of a trend

Observation is part of an anomaly

Observation includes species other than caribou

Observation includes caribou

Caribou

Multiple selection

Other

Multiple selection

Season

Multiple selection
Fall

Environment Keywords

Multiple selection
Wind

Human Impact

Multiple selection

CONTINUE BACK

Data sovereignty | Data sharing



Consent (C)

- Free, prior, and informed consent
- Clear purpose, scope, and implications
- Benefits will be shared with the communities

Access (A):

- data restrictions: fully open? limited access?
- clear protocols for managing, sharing, and controlling access to the data

Responsibility (R)

- Steward data ethically, ensuring that it is used for the intended purpose and privacy (as appropriate) and security is maintained.

Ethics (E)

- Ethics and equity are of central importance. Make sure research respects Indigenous culture, traditions, and knowledge. Spirit of consultation is incorporated throughout research and data sharing.

Discussion

- **What do you think** of the product?
- **What information** would you like to see? (it will be extended to other herds of caribou, needs to be generic)
- Database has 3 types of users:
 - Admin (edits/maintains)
 - Standard (enters documents and observations)
 - Guest (can view)
 - **Who** can have access?

NSF proposal: Long-term Arctic Observing Network to understand the threats to caribou in a rapidly changing Arctic



Dr. Ophélie Couriot
University of Alaska Fairbanks



Prof. Donatella Zona
San Diego State University



Dr. Elie Gurarie
State University of New York



Prof. Ellen Aikens
University of Wyoming



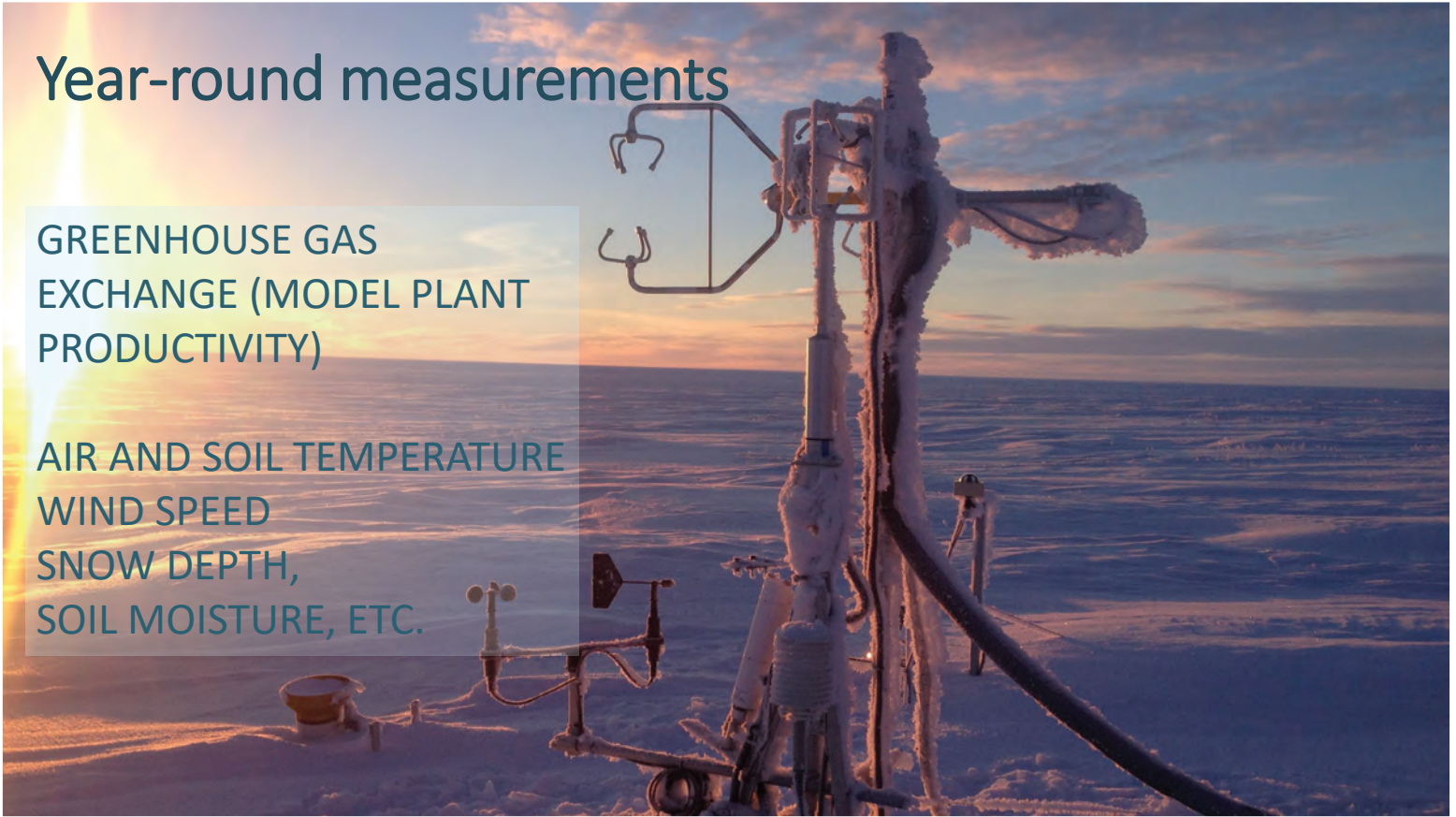
Prof. Todd Brinkman
University of Alaska Fairbanks

Five meteorological Eddy covariance towers operating since later 1990/early 2000 to present day

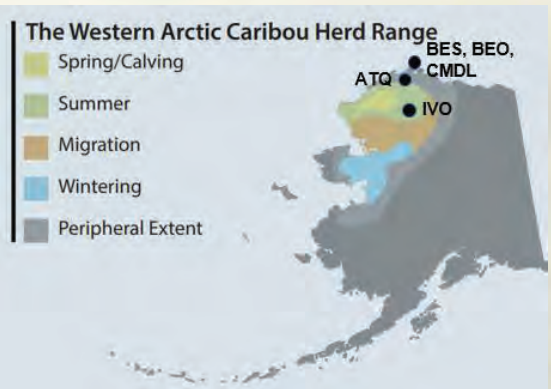
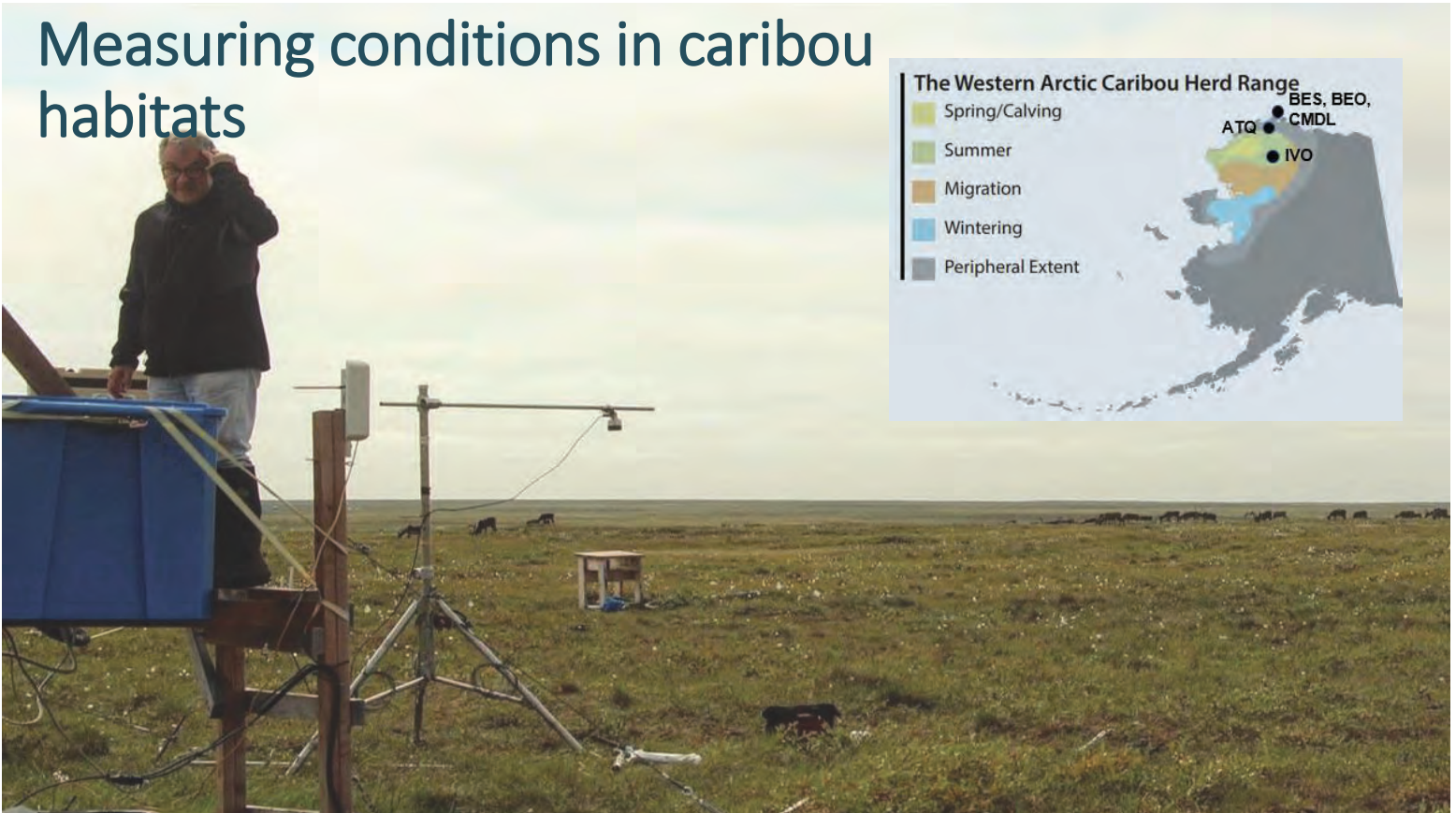
Year-round measurements

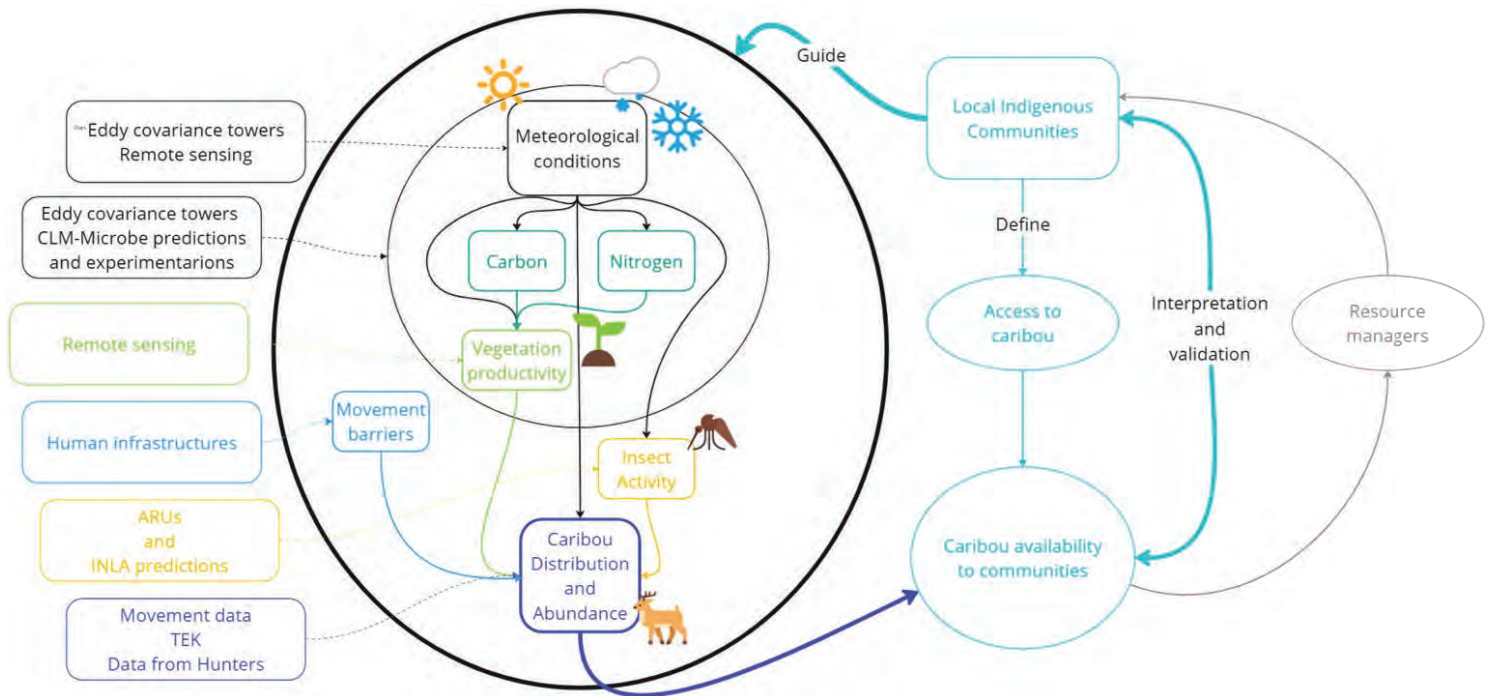
GREENHOUSE GAS EXCHANGE (MODEL PLANT PRODUCTIVITY)

AIR AND SOIL TEMPERATURE
WIND SPEED
SNOW DEPTH,
SOIL MOISTURE, ETC.



Measuring conditions in caribou habitats





Hypotheses

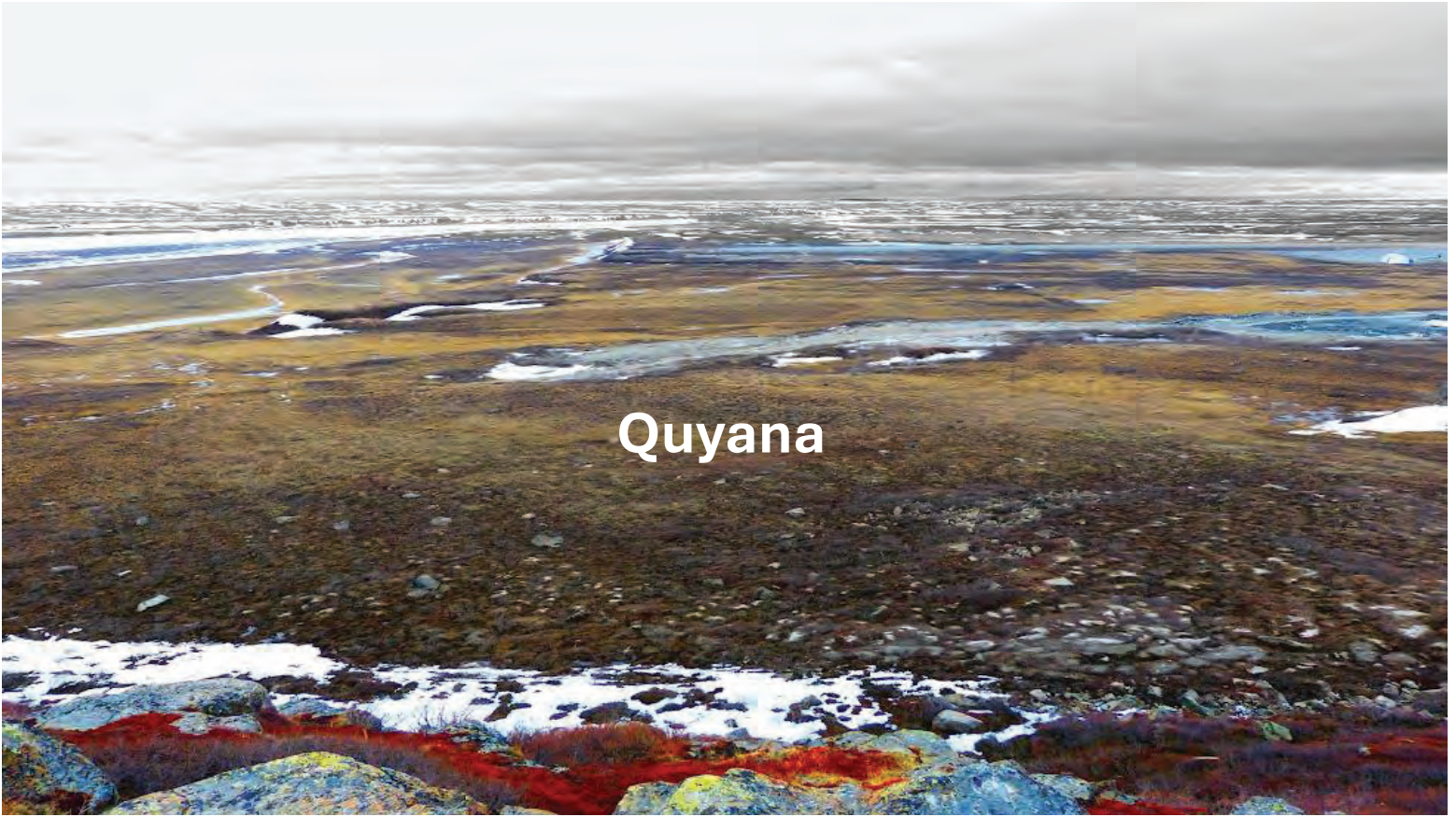
- *High caribou calving rates when summer is warm and dry or windy (higher tundra plant productivity and lower insect harassment)*
- *Good female condition and high calving rate when the duration of a late summer period is longer (plant forage widely available, but insect harassment is receding).*
- *Low calving rate with high soil moisture early in the season, associated with higher plant productivity but a higher degree of insect harassment.*
- *Low survival during the winter and change in migration routes linked to a decrease in abundance of lichens during recent decades.*
- *High nutritional value of vegetation, increased availability of snow-shelters to avoid insects, and high calf's survival when there is deep snow on summer foraging grounds. Low vegetation development and low calving rate when there are rain-on-snow events.*
- *Low survival during fall/winter when individuals encounter movement barriers during fall migration (increased exposure to unfavorable snow conditions and reduced exposure to residual forage. Delay in spring migration and high energy expenditure when individuals encounter movement barriers during spring migration.*
- *Low survival/fecundity when environmental conditions lead to poor mobility (snow quality or ice-melt/freeze-up dynamics).*

Our goals

- Center the **needs, knowledge** and **interests** of the communities within the WACH-WG range to **guide research questions**, with little additional time
 - Attending the WACH-WG meeting to share updates and discuss research questions of interest
 - Work with communities to identify how to collaborate efficiently
- Seek support for **Knowledge of the Caribou** and other research initiatives.

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- Center the **needs, knowledge** and **interests** of the communities within the WACH-WG range to **guide research questions**, with little additional time
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 - Work with communities to identify how to collaborate efficiently
- Seek support for **Knowledge of the Caribou** and other research initiatives.
- **A request**
 - Letter of support / collaboration from WACH-WG?



Quyana



WACH

WORKING GROUP

Communications Committee Report 2024

Compiled by Deb Lawton, ADF&G, December 2024

The following is a list of communications which took place between the 2023 annual meeting and this year's meeting.

Themes we focused on this year include state and federal regulation changes, how hunters can help Western Arctic Herd population, and field id of caribou bulls and cows.

Caribou Trails Newsletter:

The 2024 Edition of *Caribou Trails* was printed and distributed by the Alaska Department of Fish and Game (ADF&G) this summer with contributions from USFWS Selawik Refuge, National Park Service, Bureau of Land Management, North Slope Borough Department of Wildlife, Fate of the Caribou Project and Working Group members Vern Cleveland, Tim Fullman and Darrell Vent. It was the 24th edition of Caribou Trails. Copies have been included in your meeting packet, and you may also find the newsletter online at <https://westernarcticcaribou.net/caribou-news/>

January 2024 Caribou E-mail Newsletter:

Brittany Sweeney of USFWS Selawik Refuge produced an email newsletter with updates from the 2023 Working Group meeting, with assistance from the Alaska Department of Fish and Game (ADF&G) and the National Park Service (NPS). The newsletter was emailed to Working Group members, agency contacts, and residents throughout the Northwest Arctic Borough. See attached.

Presentations and Community Meetings:

- December 2023 NPS teacher's training presentation about WAH.
- December 2023 NPS presented about caribou and management at SRC Chairs meeting.

- February and April 2024 NPS presented to the Anaktuvuk Pass Tribal Council meeting. Information was shared about WAH regulatory proposals, collar deployments and collar retrievals.
- March 2024, Working Group Member Tim Fullman of The Wilderness Society and Heather Johnson of the U.S. Geological Survey presented on “The Status of Caribou in Alaska and Beyond” at the all-council RAC meeting in Anchorage.
- Spring and Fall 2024 representatives from NPS, Selawik Refuge, and ADF&G discussed WAH issues with Northwest Arctic, North Slope, and Western Interior Regional Advisory Councils (RAC).
- Spring and Spring and Fall 2024 representatives from NPS, Selawik Refuge, and ADF&G discussed WAH issues with Cape Krusenstern, Kobuk Valley, and Gates of the Arctic Subsistence Resource Commissions (SRC).
- April 2024 NPS presentation to the NPRA Working Group.
- May 2024 Alex Hansen of ADF&G and Kyle Joly of NPS present at Northwest Arctic Tuttu Meeting hosted by NANA Regional Corporation.
- Summer 2024 NPS assisted with UAF’s Geophysical Institute’s Iñupiaq knowledge high school curriculum on caribou.
- August 2024 Working Group member Tim Fullman presented on WAH road analyses he is working on with Matt Cameron of NPS, Alex Hansen of ADF&G, and Kyle Joly of NPS at the Ecology Society of America meeting.
- August 2, 2024, ADF&G representatives Christie Osburn, Brennan Watson, and Steve Cantine held a community meeting in Point Hope to discuss regulatory changes.
- August 9, 2024, Alex Hansen of ADF&G and Brittany Sweeney of Selawik Refuge presented at NANA Trespass Program meeting.
- August/September 2024: Selawik Refuge coordinated village "Hunter Success" meetings (in cooperation with tribes). Representatives from Selawik Refuge, ADF&G, and NPS participated at meetings in Noorvik (54 attendees), Selawik (25 attendees), and Buckland 15 attendees).
- September 2024 NPS presented to a San Diego State University graduate seminar on WAH caribou.
- September 2024 NPS presented to NANA about the status of caribou population.
- September 2024 NPS presented to the Porcupine Caribou Herd Technical Committee about the WAH.
- October 2024 NPS presented information about the status of caribou to a joint meeting of the Bering Intergovernmental Tribal Advisory Council and Bering Task Force (Northern Bering Sea Climate Resilience Area) for the Office of Science and Technology (Office of the President)
- October 2024 NPS presented to Memorial University of Newfoundland graduate seminar about WAH.
- November 2024 NPS presented to University of Alaska – Fairbanks.

Community/School Programs:

- December 2023: USFWS caribou craft activity (ornament making and needle felting) in Selawik with a “protect the cows” theme.
- February 2024 Working Group Member Tim Fullman gave a caribou presentation at Park Elementary School in Anchorage.
- ADF&G hosted a caribou scavenger hunt at Arctic Circle Spring Festival in Kotzebue whose objective was harvesting bulls instead of cows.
- April 2024: caribou were the focal animal for Selawik Refuge’s “critter of the month.”
- October 2024 NPS Presented to 5th grade class about the adaptation of WAH caribou (40 students)
- November 2024 Working Group Member Tim Fullman gave a caribou presentation at Northern Lights ABC School in Anchorage.
- December 2024 ADF&G biologists/pilots Alex Hansen and Christie Osburn present to Kotzebue. ANSEP students.
- Year-round Selawik Refuge education program did 14 total classroom presentations in Kotzebue and Selawik elementary classes with 202 participants.
- Year-round: NPS visited 6 villages and did caribou-migration science centric programs and outreach with the new “caribou soup” activity book in K-8 classrooms.
- Year-round: A NPS agreement with Maniilaq funded a trainee position at the Siglaug, which runs the facility which provides traditional foods to elders and the Hunter Support Program.

Agency Social Media/Media Requests Ongoing:

- WACH-related posts appear on the Selawik Refuge Facebook page (USFWS); Kobuk Valley National Park, Bering Land Bridge National Preserve, and Northwest Arctic Heritage Center pages with (NPS); and the ADFG Wildlife Conservation – Northwest Alaska - Region V page.
- <https://www.facebook.com/search/top?q=selawik%20national%20wildlife%20refuge>
- <https://www.facebook.com/search/top?q=kobuk%20valley%20national%20park>
- <https://www.facebook.com/search/top?q=bering%20land%20bridge>

[e%20national%20preserve](#)

- <https://www.facebook.com/search/top?q=northwest%20arctic%20heritage%20center>
- <https://www.facebook.com/ADFGWildlifeNorthwestAlaska>
- Year-round Selawik National Wildlife Refuge, National Park Service and Alaska Department of Fish and Game provide information to the general public and media about scientific publications, submitting public comments on proposals and projects, board decisions and regulations updates related to caribou.
- This past year NPS provided media interviews to National Geographic, BBC, Yale Environment 360, Anchorage Daily News, Alaska Beacon, Arctic Sounder, Wide Mona Lisa Productions, Hamako Films, Northern Environmental Center podcast and other outlets regarding the WAH.
- ADF&G provided interviews with Alaska Public Media, Arctic Sounder, Anchorage Daily News, and others.

Media Articles:

Alaska Beacon, Dec. 19, 2023 - *Western Arctic Caribou Herd population decline continues, with hunting expected to be affected.* See attached or <https://alaskabeacon.com/2023/12/19/western-arctic-caribou-herd-population-decline-continues-as-does-endorsement-of-hunting-limits/>

Alaska Beacon, Jan. 16, 2024 - *Oil field road traffic disrupts North Slope caribou more than previously recognized.* <https://alaskabeacon.com/2024/01/16/oil-field-road-traffic-disrupts-north-slope-caribou-more-than-previously-recognized/>

Alaska Beacon, Mar. 14, 2024 – *Caribou declines causing angst for Alaska hunters are part of wider North America trend.* <https://alaskabeacon.com/2024/03/14/caribou-declines-causing-angst-for-alaska-hunters-are-part-of-wider-north-america-trend/>

Arctic Sounder, Jan. 30, 2024 - *State regulators limit hunting of Western Arctic caribou to 15 animals a year.* <https://www.adn.com/arctic-sounder/news/2024/01/30/state-regulators-limit-hunting-of-western-arctic-caribou-to-15-animals-a-year/>

Arctic Sounder, April 10, 2024 - *Federal regulators cut Western Arctic caribou harvest limit to 15 animals a year.* <https://www.adn.com/arcticsounder/news/2024/04/10/federal-regulators-cut-western-arctic-caribou-harvest-limit-to-15-animals-a-year/>

Radio/TV:

- Alaska Public Media, Jan. 8, 2024 – Discussing the future of Alaska’s Caribou. <https://alaskapublic.org/2024/01/08/discussing-the-future-of-alaskas-caribou-addressing-alaskans/>
- KNOM in Nome aired a story on ADF&G’s announcement of the new caribou bag limit for the Western Arctic Herd.

Web Articles:

- A Caribou Heritage: Anaktuvuk Pass Elder Charles “Sollie” Hugo (ADF&G):
https://www.adfg.alaska.gov/index.cfm?adfg=wildlifeneews.view_article&articles_id=4096
- Meet the GeoAction Heroes:
<https://www.aag.org/geography-awareness-week-2024/#geoaction-heroes>

Committee Makeup:

Current Communications Committee members:

- Vern Cleveland
- Ben Child
- Tim Fullman
- Tom Gray
- Michael Stickman

Current Agency Representatives:

- ADF&G – Deb Lawton (email deb.lawton@alaska.gov)
- NPS – Kyle Joly (email kyle_joly@nps.gov)
- USFWS – Brittany Sweeney (email brittany_sweeney@fws.gov)
- BLM – *Bruce Seppi* (email bseppi@blm.gov)

**Western Arctic Caribou Herd Working Group
DRAFT – 2023 Meeting Summary**

December 13-14, 2023

Downtown Marriott Hotel, 820 W. 7th Ave, Anchorage

DRAFT for review & approval by WACH Working Group at December 2024 meeting.

The Western Arctic Caribou Herd (WACH) Working Group (WG) met in person on December 13th and 14th, 2023 (see agenda at the end of this document). The following is a summary of meeting presentations and Working Group member discussions. Motions passed at the meeting pages 15-16. The Working Group “Binder” that includes all written materials referred to at the meeting is posted at www.westernarcticcaribou.net

I. Call to Order – WG Chair Vern Cleveland called the teleconference to order at 8:30 a.m.

A. WACH WG Roll Call / Establish Quorum – Quorum was met with 15 of 20 WG members present at 8:30 am on Day 1. 15 of 20 members were present on Day 2. The following table lists WG membership attendance at this meeting.

Working Group Seat	Working Group Member
1. Anchorage Advisory Committee	Neil DeWitt
2. Buckland, Deering, Selawik	Vida Coaltrain
3. Anaktuvuk Pass, Nuiqsut	Mary Hugo (not present)
4. Elim, Golovin, White Mountain	Morris Nakaruk (not present, alternate)
5. Fairbanks Hunters	John Wisniewski
6. Hunting Guides	Jake Jacobson
7. Kivalina, Noatak	Daniel Foster, Sr. (not present)
8. Kotzebue	Cyrus Harris (Vice Chair)
9. Koyukuk River	Darrell Vent
10. Lower Kobuk River	Vern Cleveland, Sr. (Chair)
11. Middle Yukon River	Michael Stickman
12. Point Hope and Point Lay	Steve Oomittuk (not present)
13. Nome	Charlie Lean
14. Conservationists	Tim Fullman
15. Northern Seward Peninsula	Johnson Eningowuk (alternate)
16. Reindeer Herders Association	Tom Gray
17. Southern Seward Peninsula	Morris Nassuk (not present)
18. Transporters	Ben Child (alternate)
19. Upper Kobuk River	Bill Bernhardt
20. Atqasuk, Utqiagvik, Wainwright	Joseph Leavitt (alternate)

MOTION by Micky Stickman, second by Neil DeWitt, to approve the following primary and alternate members to the WACH Working Group – Seat 5 primary John Wisniewski; Seat 9 primary Jack Reakoff; Seat 9 alternate Darrell Vent; Seat 20 alternate Joseph Leavitt. Motion PASSED unanimously on a voice vote.

B. Audience Attendance: Public and agency attendance was not taken. However, 30+ people were present in the audience, including agency staff that presented information to the Working Group.

- C. **Approve Agenda:** Facilitator Holly Spoth-Torres reviewed the agenda (Attachment 1). MOTION by Cyrus Harris, second by Neil DeWitt, to approve the meeting agenda. Motion PASSED unanimously on a voice vote.

II. Western Arctic Caribou Herd Status & Management Level

Western Arctic Caribou Herd Overview and 2023 Census – Alex Hansen, Alaska Department of Fish and Game (ADFG) Division of Wildlife Conservation, presented information about the WACH population status and trends (see p. 13 in 2023 WG Binder). The presentation laid the foundation for the WG's later recommendations regarding future management of the caribou herd. Key points in the ADFG presentation included:

- **Herd population declining** – The 2023 photocensus estimated 152,000 caribou in the Western Arctic Caribou Herd which is down from 164,000 in 2022. Census numbers for past years: 2021 – 188,000; 2020 – no census; 2019 – 244,000; 2018 – no census; 2017 – 259,000; 2016 – 201,000. Between 2022 and 2023 the herd has declined about 7.5%. We are entering the fourth year below 200,000 animals which is the target for intensive management.
- **Calving (parturition) is below average** – Summer surveys show that 77% of collared cows had calves in 2023, compared with 64% in 2022, 68% in 2021, 67% in 2020, 81% in 2019, 86% in 2018, and 83% in 2017. The long-term average calving rate is 70% (1992-2023). Parturition is up slightly and overall nothing we see here is concerning.
- **Yearling recruitment is average** – Yearling recruitment in 2023 was 17:100 yearlings:adults, which is the same as in 2022 and matches the 25-year average (1998-2022).
- **Fall herd composition:** The bull:cow ratio is 50 bulls for every 100 cows. The management plan states that we should be maintaining a ratio of 30 bulls for every 100 cows – we are well above that and there are no major concerns.
- **Adult cow survival is below average** – Cow survival rate for 2023 was 69%, which is below the long-term average of 81% (1987-2020). Adult cow survival is the primary concern related to the recent population decline. The herd won't see growth unless survival is above 80% and will continue to decline.
- **Cause of mortality** – Primary causes of mortality are predation, (51%) "unknown" (32%), and hunting (17%).
- **Population trend** – Since 2005, the herd has had more years of decline than increase or stability, with cow mortality higher and calf recruitment lower.
- **Management level per WACH Cooperative Management Plan** – Each year, the Working Group considers what management level should be assigned to the Western Arctic herd, based on Table 1 of the WACH Cooperative Management Plan (updated 2019). At its meeting on December 12, 2023, the WACH Technical Committee recommended that the Working Group assign the same management level as 2022, the management level "Preservative, Declining", based on the herd size (within the range of 130,000-200,000) and adult cow survival rate less than 80%. The Preservative, Declining Management Level recommends a harvest of somewhere between 6000 and 10,000 caribou. At this "Preservative" management level, the Cooperative Management Plan indicates that the following management recommendations should be considered (see Table 2 in the 2019 Management Plan):
 - No harvest of calves
 - Limit harvest of cows by residents through permit hunts and/or village quotas
 - Limit subsistence harvest of bulls only if <30 bulls:100 cows
 - Restrict harvest to residents only, according to State and federal law. Closure of some federal public lands may be necessary.

(NOTE – Later in the meeting, the Working Group passed a motion designating the Western Arctic herd as “Preservative, Declining” in 2023.)

- Recommended Harvest – The recommended harvest rate is 4.8%. 4.8% of 152,000 equals 7,296 caribou, keeping the harvest composition at 70% (5107) bulls and (2189) 30% cows.
- Harvest Strategies – It is critical to limit the harvest of cows. An individual cow, through its lifetime has the potential to produce 52 caribou. If we continue to harvest cows at the same rate, the herd will continue to decline. Nonresident harvest is irrelevant and has little impact on the herd population.
- Recommended Management Actions
 - Net reduction of harvest
 - Cow harvest is the highest priority (no surplus)
 - Bull harvest – maintain healthy bull:cow ration
 - Get accurate harvest data
 - Increase understanding of mortality causes
- Summary – There are significant biological concerns. We are approaching the CRITICAL LEVEL (table 2 of the Management Plan).

Working Group members’ questions and discussion on herd status included:

- Q: Are you monitoring winter grazing?
A: ADF&G isn’t specifically monitoring winter range selection.
- Comment – We must consider both the bulls and the cows when we are making decisions. Healthy bulls are leaders.
- Comment – Limiting non-federally qualified hunters doesn’t have any impact on the herd numbers.
- Comment – Once we get to population numbers like this, we really need to be thinking about strategies to help the population. We don’t want to see numbers in the early 1970s (75,000). Those were difficult days.
- Q: In the 90s, when the calving rate was low, the herd population still grew. Why is that?
A: The cow survival rate during that time was much higher.
- Q: Are you working with the federal agencies to ensure there are enough animals for subsistence users?
A: Yes, we coordinate with our federal partners and using the data we must implement strategies to increase herd numbers.

National Park Service Caribou Monitoring – Kyle Joly, NPS, presented information on the movements of caribou the NPS has collared (see p. 22 in WG Binder). Points from the presentation:

- WAH Collar Results (Sept 2022 – Aug 2023) – 56 GPS collars were deployed. This was a record number of collars.
- There is more and more evidence indicating that the Red Dog Mine road is slowing caribou down.
- Fall migration, Kobuk River Crossing – From 2010-2015 over 80% of the collared caribou crossed the Kobuk River to winter farther south. From 2016-2021, an average 37% crossed the Kobuk River, with a low of just 6% of the herd crossing in 2020. In the fall of 2021, 73% of the herd crossed the Kobuk River. However, in the fall of 2022, 21% made it to the Kobuk Valley, another low. There are wild swings in caribou distribution and movement from year to year.
- Over time we know that caribou are crossing the Kobuk almost later than is typical. In 2022 the animals crossed on September 21.
- Overwintering – There has been a dramatic change in recent years in where Western Arctic Herd caribou are wintering, in terms of NPS conservation units in the herd’s range. For the last five winters, no caribou have wintered in the Bering Land Bridge National Preserve – while 7 - 8 years

ago 75% of the collared animals wintered there. 65% of collars ended up in Gates of the Arctic, the second highest ever.

- Migration distance – The mean distance of travel by collared caribou from September 2022 - August 2023 was 1,777 miles, which is lower than the previous year and slightly below average.
- Fall Migration, Noatak River Crossing – The distribution of the herd crossing the Noatak was similar to 2022, with 60% crossing in the upper Noatak almost to the Gates of the Arctic boundary. When compared against the average distribution of the herd crossing the Noatak over time, in 2022 none of the herd crossed the very lower Noatak while between 2010 and 2016 an average of 13% crossed the lower Noatak.
- Spring migration – The route and timing of spring migration doesn't show as much variation over the years, as cows are motivated to get to the calving grounds and timing of calving has not been changing much. In 2023 the herd was crossing the Selawik River on May 2.
- North American Caribou Workshop – Keynote and other important talks are available on the website. <https://westernarcticcaribou.net/contactalaska-fish-game/links/>
- Recent research papers of interest –
 - “Continental synchrony and local responses: Climatic effects on spatiotemporal patterns of calving in a social ungulate” – <https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.4399>
 - “Towards long-term records of rain-on-snow events across the Arctic from satellite data” – <https://www.nps.gov/articles/000/detecting-icing-events.htm>

Working Group questions and discussion on the NPS presentation included:

- Q: Does herd size impact migration?
A: Yes. When a herd is bigger, it needs more space and therefore covers a lot more ground, needing more habitat and migrating farther distances. When the herd decreases, it won't move as far.

Northern Latitude Herds – Kyle Joly presented an overview on caribou in northern latitudes. See page 29 of the WG Binder to see key takeaways from the presentation.

Working Group Decision on Herd Management Level – The Working Group discussed the recommendation from the Technical Committee that the WACH be within the “Preservative” and “Declining” management category, with regard to Table 1 of the WACH Cooperative Management Plan (p. 21 of the 2019 plan).

Working Group members expressed the following comments in discussion of the herd Management Level:

- With the herd declining we need to act.
- The monitoring of annual harvest is lacking, including of sport hunters.
- Agree with the Technical Committee that Preservative, Declining is the right management category.
- Before we place restrictions on subsistence use, we should first focus on restricting sport hunting, commercial use of the resource. This use creates a lot of air traffic and noise disturbance. We need to act now before the numbers reach the critical range.
- However, we need to remember that sport hunting is such a small percentage of caribou taken. And the industry is important for some villages.

MOTION by Michael Stickman, second by Tom Gray, to accept the recommendation by the Technical Committee to set the Management Level for the Western Arctic Herd at “Preservative, Declining” per

the 2019 WACH Cooperative Management Plan, Table 1. Motion PASSED on a roll call vote. Votes - Yes: 15; No: 0; Abstain: 0

Regulation Change Proposals Under Consideration by the Board of Game and Federal Subsistence

Board – Phil Perry, ADF&G & Will Wiese, USFWS

In 2023, the WACH WG submitted three proposals – one (1) federal wildlife proposal to the Federal Subsistence Board (FSB) and two (2) state proposals to the Board of Game (BOG). Phil and Will discussed these proposals as well as additional proposals under consideration by the FSB and BOG that may impact the WACH.

Phil first discussed the BOG process.

BOG is meeting in Kotzebue on Jan 26 – Jan 29, 2024. The meeting is open to the public. The BOG will consider the following proposals for Region 5, which includes Units 22, 23, and 26A. However, the WG proposals included units broader than Region 5 so ADF&G is going to ask the BOG to defer the portion that refers to the other units to their meeting dealing with Interior Units in March, 2024.

BOG Proposal 2 – (WG proposal) 4/person only one cow, all units in the range

Discussion and questions:

- 4 animals per person is enough for people.
- Q: Under our proposals are proxy hunts still allowed?
A: Yes.

MOTION by Michael Stickman, second by Neil DeWitt, to reaffirm the Working Group’s proposal (BOG Proposal 2) to the Board of Game to change harvest regulations to 4 caribou per person per year only one of which can be a cow. Motion PASSED on a roll call vote. Votes - Yes: 14; No: 1; Abstain: 0

Assignment: Holly Spoth-Torres will submit a comment to the Alaska Board of Game on behalf of the Working Group reaffirming the harvest reduction proposal submitted in 2023.

BOG Proposal 3 – (WG proposal) Close NR hunting range-wide

Discussion and questions:

- Most non-resident hunters want bulls.
- There is a stronger desire by non-resident hunters to keep the meat. Transporters ensure that non-resident hunters are following the laws and regulations which they are responsible for following. Transporters work with the troopers to ensure that all rules are being followed.
- Non-resident hunters also provide a benefit to the state and the regions they hunt. Their fees go toward research and data collection.
- This is an ‘all hands on deck’ situation to preserve the herd. This is a joint effort between resident and non-resident hunters. Maybe we should look at a formal rubric for non-resident hunters, like proposal 5, rather than a complete closure.
- Q: What percentage of animals taken are by non-residents?
A: Historically, it is 5% or less of the harvestable surplus. Last year 85-90 animals taken. Currently, the harvest of cows by non-resident hunters is 3-5 individuals.

MOTION by Darrell Vent, second by Neil DeWitt, to reaffirm the Working Group’s proposal (BOG Proposal 5) to the Board of Game to close caribou hunting to non-residents range-wide. Motion PASSED on a roll call vote. Votes - Yes: 9; No: 6; Abstain: 0

Assignment: Holly Spoth-Torres will submit a comment to the Alaska Board of Game on behalf of the Working Group reaffirming the proposal submitted in 2023 to close caribou hunting to non-residents in the range of the WAH.

Proposal 4 – Align U23 (Pt Hope) with 26A submitted by the North Slope F&G Advisory Committee.

Discussion and questions:

- This is out of our jurisdiction so we should remain silent on this. The BOG needs to make their decision. We've submitted our proposals (Proposal 2 and 3).

MOTION by Neil DeWitt, second by Tim Fullman, to take no action on Proposal 4 with unanimous consent. Motion FAILED.

Proposal 5 – Reduce resident harvest to 5/person, only 1 cow and create a NR registration permit for 400 hunters.

Discussion and questions:

- A NR registration might be a good way to limit NR use without a complete closure. Some WG members like this compromise. We should consider proposing an adjustment to the proposal of a NR permit of 400 hunters. Maybe find a compromise somewhere between 0 and 400.
- We supported a resolution supporting reductions for residents to 4 animals and this proposal is 5 animals.
- Yesterday we voted to reaffirm proposals 2 and 3. That's our position.

MOTION by Neil DeWitt, second by Darrel Vent, to take no action on Proposal 5. Motion PASSED on a roll call vote. Votes - Yes: 13; No: 1.

Proposal 18 – Open 22A for caribou harvest.

Discussion and questions:

- There's too much confusion about caribou vs reindeer. Reindeer herders have authorized ranges, and this would potentially allow hunters to mistake reindeer for caribou.

MOTION by Darrel Vent, second by Neil DeWitt, to oppose Proposal 18. Motion PASSED on a roll call vote. Votes - Yes: 11; No: 3.

Federal Proposal 24-28 – 4 caribou/year, only one may be a cow throughout WACH range

Discussion and questions:

- We need to stand by our proposal 24-28 that covers the entire range of the WACH.
- The North Slope is indicating that they need more caribou than this proposal.

MOTION by Darrel Vent, second by Neil DeWitt, to reaffirm the Working Group's proposal (FSB 24-28) to the Federal Subsistence Board to change harvest regulations to 4 caribou per person per year only one of which can be a cow. Motion PASSED on a roll call vote. Votes - Yes: 13; No: 1; Abstain: 0

Federal Proposal 24-29 – 4 caribou/year, only one may be a cow, Unit 23 Only, submitted by the Northwest Arctic Regional Advisory Council

Discussion and questions:

- We included Unit 23 in our proposal because we wanted to state that our proposal should cover all the units that the Western Arctic Herd travels.
- We need to stand by our proposal 24-28.

- We should support our original proposal and leave it up to the FSB to carve out specific units if they wish.

Federal Proposal 24-30/31 – No non-federally qualified hunters for caribou August 1 to October 31 in Unit 23

Discussion and questions:

- There is currently a temporary closure in place.
- These are federal public lands, and this restricts access to them.
- Everyone needs to be involved in the preservation of the herd, not just subsistence users.
- A permanent closure might do more harm than good because it forces people to go elsewhere off public land for the caribou and might concentrate an impact on the herd.

MOTION by Darrel Vent, second by Cyrus Harris, to support Federal Proposal 24-30/31. Motion PASSED on a roll call vote. Votes - Yes: 10; No: 4; Abstain: 0

Assignment: Holly Spoth-Torres will submit a comment to the Federal Subsistence Board on behalf of the Working Group reaffirming support of Federal Proposal 24-28 and supporting Federal Proposal 24-30/31.

III. Resource Development in the Herd's Range

Tim Fullman, Chair of the Working Group's Resource Development Committee, gave an update on resource development projects within the range of the herd (p. 61 in WG Binder). Tim's role as the Resource Development Committee Chair is to keep an eye on development proposals in the range of the herd and assist the working group in drafting and submitting comments on these developments as appropriate.

Ambler Road Project (p. 62 in WG Binder)

- In 2020 the BLM approved permitting of an Ambler access road.
- Two lawsuits were filed requiring the BLM to complete a Supplemental Environmental Impact Statement.
- The BLM was then required to go back and fix some of the deficiencies in the original EIS.
- In October of 2023 the BLM released a Draft Supplemental Environmental Impact Statement which looked at the same three alternatives for different roads to the Ambler District. The BLM also added another alternative (skip pioneer road and directly to a single lane road).
- Another change – BLM considered public access and trespass on the road as reasonably foreseeable.
- The DSEIS also proposes approving the road.
- The DSEIS acknowledges disturbances to caribou.
- We need to submit comments by December 22, 2023.
- Tim has drafted comments for your review for consideration at our business meeting (p. 66 in Binder).

D1 Land Withdrawal (p. 80 in WG Binder)

- The Alaska Native Claims Settlement Act (ANCSA) withdrew nearly 50 million acres of land from mineral and energy development to allow protection for the public interest.
- BLM is considering opening 28 million of these acres for development.
- Lands include calving grounds, summer range of the herd, and others.

- There will be an opportunity to comment this month or next month on what we believe the impact of development will be on the WAH.
- Could lead to loss of subsistence priority.

NPR-A Special Areas Rulemaking (p. 82 in WG Binder)

- The strongest protections for wildlife, habitat, and subsistence in the NPR-A occur within designated “Special Areas,” including the Utukok River Uplands Special Area that protects much of the WACH calving grounds.
- After direction at our last meeting, we submitted comments suggesting to raise the northern boundary of the calving area for protection of the WACH.
- Should have a final ruling in March of 2024.
- The Alaska Delegation is very interested in this development, but concerns have been raised about impacts to subsistence from Brevig Mission and Teller residents, though opinions are mixed.

Graphite One Mine (p. 90 in WG Binder)

- The Graphite One project is a proposed graphite mine on the Seward Peninsula between Brevig Mission, Teller, and Nome.
- Largest known graphite deposit in the nation, which is important for lithium batteries. There is interest in a domestic source for graphite because almost all of the world’s high-quality graphite comes from China.
- There is not yet an opportunity for public comment, but the Working Group will pay attention to the project moving forward.

ASTAC Fiber Optic Project (p. 92 in WG Binder)

- Arctic Slope Telephone Association Cooperative, Inc. (ASTAC) provides telecommunications, including internet access, for North Slope communities. They recently received Federal grants to connect Anaktuvuk Pass, Nuiqsut, and Point Lay with high-speed fiber optic broadband.
- Not a lot of details have been made public, but at least for Anaktuvuk Pass the plan seems to be to lay undersea cable on the tundra and wait for it to sink down out of sight. They are hoping to do construction in 2024 and 2025 with service available starting in 2025.
- It is not clear what opportunities there are for public comment but if this is of interest to the Working Group we can try to engage further.

Annarraaq – Aktigiruaq Mining Exploration (p. 93 in WG Binder)

- The Annarraaq-Aktigiruaq mining exploration project would evaluate the potential of new mineral deposits north of the current Red Dog Mine (see map above). The Working Group commented multiple times on the Teck America Inc. proposal.
- The Army Corps of Engineers has not yet made a decision about the application and is still working on the Section 106 process, including going through a new cultural study.
- No new opportunities for comment.

Willow Master Development Plan (p. 89 in WG Binder)

- This project would expand infrastructure in the northeastern part of the National Petroleum Reserve, Alaska, or the NPR-A. Oil and gas development would move further westward and move up

further north to the edge of the Teshekpuk Lake special area, which protects critical calving, post calving and insect relief habitat for the Teshekpuk caribou herd. This project was initially approved back in 2020, but like Ambler, there was a legal ruling that halted that development and led to a supplemental environmental impact statement analysis.

- The Willow Project is not one that the Working Group has commented on in the past because it primarily would impact the Teshekpuk Herd, not the Western Arctic Herd, but since the two herds tend to be managed similarly, and given some of the recent patterns of winter use by the Western Herd where many animals have stayed up on the North Slope, this is a project we should track.
- The Willow project underwent multiple revisions and legal battles but was ultimately approved by BLM in March 2023.

Noatak – Red Dog Road - Planning and Environmental Linkage (p. 95 in WG Binder)

- In 2019, the Alaska Department of Transportation and Public Facilities (DOT&PF) announced it is partnering with the Northwest Arctic Borough and Native Village of Noatak to look into building a permanent gravel road connecting Noatak to the DeLong Mountain Transportation System (DMTS, i.e., the Red Dog road). A Noatak Planning and Environmental Linkages (PEL) study was initiated to consider project options. In 2020, the Working Group submitted a letter to DOT&PF relevant to minimizing impacts to the Western Arctic and Teshekpuk caribou herds.
- It appears that DOT&PF has made little progress on the Noatak PEL as the website appears to have been removed.

The following comments and questions were raised in Working Group discussion of the Resource Development Committee report:

- Q: Are the OTZ towers being placed on the highest spots possible? Caribou also go to the high spots.
A: Generally, towers are placed on high points. They are usually about 30 miles apart and need to be connected by line of sight.
- Q: Are the OTZ tower construction require road access?
A: Materials will be flown in by helicopter.
- Comment: Regarding the D-1 withdrawal, I believe that the State of Alaska has over-selected lands.

IV. Ambler Road Project

Geoff Beyersdorf, BLM District Manager in the Fairbanks District Office presented information to the Working Group about the status of the Ambler Road project (p. 96 in WG Binder).

- AIDEA is the applicant requesting the right-of-way for the project.
- AIDEA has proposed to construct, operate, maintain, and eventually remove an allseason, industrial access-only road from the Dalton Highway to the Ambler Mining District. The project would include construction of bridges, material sites, maintenance stations, airstrips, and related features.
- BLM is required to respond to AIDEA's permit application requesting a right-of-way for the project. BLM is the lead federal agency for the Supplemental EIS and the subsistence analysis required by ANILCA Section 810, and for compliance with Section 106 of the National Historic Preservation Act..
- The BLM must decide if a ROW will be granted and, if so, the terms and conditions that will be imposed.

Key Milestones – Starting in 2020

- Right-of-Way application filed by AIDEA in June 2016.
- Joint Record of Decision (ROD) was signed in July 2020 approving Alternative A (AIDEA’s proposed action).
- NAEC et. al., lawsuit filed August 2020.
- TCC et. al., lawsuit filed October 2020.
- BLM issued ROW grant in January 2021.
- DOI filed motion for voluntary remand of decisions made in the Joint ROD – February 2022.
 - Motion cited perceived deficiencies in the ANILCA 810 analysis and perceived lack of consultation associated with development of the PA for the Section 106 process.
 - Motion requested to the agencies to allow for “reconsideration through the administrative process.” [read: Supplemental EIS].
- Deputy Secretary suspended AIDEA’s ROW grant – March 2022.
- Court granted motion for voluntary remand of decisions in the JROD – May 2022.
- BLM published NOI to prepare SEIS with a 45-day comment period/scoping process in September 2022.
- BLM published the Notice of Availability for the Draft SEIS beginning a 60-day public comment period ending on December 22, 2023.

There are 4 alternatives on the table. BLM doesn’t have a preferred alternative. (See map on page 97.) AIDEA’s proposed alternative is Alternative A.

What is the SEIS?

- A Supplemental EIS is a document that is prepared pursuant to the National Environmental Policy Act (NEPA) when there is substantial new information relevant to environmental concerns that have bearing on the proposed action or its effects.
- This DEIS will build upon the original analysis.
- Includes new data – water, air quality, wetlands, etc.
- Updates proposed mitigation measures.
- The DEIS includes more data on caribou migration.
- DEIS completed a Section 810 of ANILCA analysis. The initial evaluation stated that the project “may significantly restrict subsistence uses” so several subsistence hearings are being held.
- The following factors were considered in the 810 Evaluation including:
 - Abundance of resource
 - Availability of resource
 - Access to resource
 - Importance of the potentially impacted subsistence resource with a community
- The 810 findings were cumulative. Of the 66 communities analyzed, 34 may have significant restrictions to subsistence use (See page 101 of WG binder).
- ANILCA 810 Summary for Alternatives A and B
 - Ambler Road could cause a reduction in the availability of caribou due to:
 - the herd being delayed or deflected by the road.
 - If the lead caribou are disrupted then a majority of the herd could be impacted.
 - Ambler Road could cause population level impacts to the Western Arctic Caribou Herd (a reduction in the abundance) due to:
 - increased energy expenditure

- reduced foraging rates,
- increased winter mortality, and
- decreased breeding success.
- Ambler Road could cause a reduction in the abundance and availability of harvestable fish due to:
 - increased sedimentation and changes in habitat.
- The construction and operation of the road could cause a reduction in access for the communities of: Alatna, Allakaket, Ambler, Bettles, Evansville, Kobuk, and Shugnak.
- Alternative C would be less likely to impact WAH migration, but would cover more of their wintering grounds and therefore has an overall affect on a greater amount of the herd's habitat. The construction and operation of the road could cause a reduction in access for the communities of: Alatna, Allakaket, Ambler, Anaktuvuk Pass, Hughes, Huslia, Kobuk, Selawik, Shungnak, Stevens Village, and Tanana.

Opportunities for the WACH Working Group to Participate

- Provide substantive Comments – identify an issues or an idea in the Draft SEIS and explain why it is a problem or how to solve the problem.
- Provide verbal comments at a public hearing.
- Mail or hand-deliver comments.
- Provide comments online.

The following comments and questions were raised in Working Group discussion of the Ambler Road report:

- Comment: All the routes impact the migration patterns.
- Q: Addressed to Tim Fullman. Were all the issues resolved in the DEIS?
A: Some were addressed, some were not, which is why we will be submitting additional substantive comments on the DEIS.
- Comment: This road will impact caribou numbers.
- Comment: The road will impact our way of life and our way of getting food. We should be using funds to improve villages.
- Q: When will we see the preferred alternative?
A: The preferred alternative will be in the Final EIS.
- Comment: All the villages on the middle Yukon oppose the road. We need to make decisions based on caribou, but we also need to represent the people we represent.
- Comment: We should support a No Action alternative. This would be the best solution for a subsistence lifestyle.

V. Community Harvest Assessment Program

Helen Cold, ADFG Subsistence Division, presented to the Working Group explaining the community harvest surveys (caribou focus) that are being conducted in eight communities within the range of the Western Arctic herd (p. 105 in the WG Binder).

- The communities included in the surveys: Golovin, Selawik, Shungnak, White Mountain, Shishmaref, Noatak, Deering and Kobuk.
- Methods include household surveys, ethnographic interviews with mapping, and participant observation.

- Funding Agency: US Fish and Wildlife Service
 - Research partnership among 8 study communities, ADF&G Subsistence, ADF&G Department of Wildlife Conservation
- The project started in 2019 and will continue through 2024.

VI. North Slope Caribou Harvest

Brian Person, Senior Wildlife Biologist with the North Slope Borough Department of Wildlife Management presented data and information about caribou harvest in communities on the North Slope within the range of the Western Arctic Herd. (Report begins on page 122 of the WG binder)

- Methods for estimating caribou harvest in North Slope communities within the range of the Western Arctic Herd (WAH)
- Results of community harvest data from households were surveyed in the communities of Anaktuvuk Pass (average 815/year), Point Hope (466/year), Point Lay (501/year), Wainwright (1193/year), Atkasuk (191/year), and Utqiagvik (4138/year) ~ between 2014-2021
- Methods used in a spatial analysis that assigns harvest to the WAH and Teshekpuk herd (TCH) between 2016-2021 when harvest data were available (SPATIAL ANALYSIS)
- Preliminary results on the proportion of caribou harvest from the WAH and TCH for each community

The following comments and questions were raised in Working Group discussion of this report:

- Comment: This information complements the actions we took yesterday. Thank you.
Response from Brian: The most important thing to do is communicate proposals so that communities aren't blind-sided.
- Q: Do you know the bull::cow ratio?
A: Yes, we are collecting this information from the communities as well.

VII. Fate of the Caribou Project

Dr. Elie Gurarie, from SUNY College of Environmental Science and Forestry, presented on the Fate of the Caribou Project. See the presentation on page 134 of the WG binder.

- Received funding to study the impacts of a changing Arctic on caribou movements.
- Showed impact on caribou movements of a winter road to diamond mines in Canada.
- A relevant story map link shared:
<https://storymaps.arcgis.com/stories/8aeec00de1454358a6dfed6ddbc24441>
- Building a knowledge database, compiling knowledge of the caribou.
- Dr. Gurarie would like to consult with you on how to use this information. They are guided by ethical principles of sharing and collecting data.
- We are submitting a proposal to the NSF to fund this work and are requesting a letter of support.

The following comments and questions were raised in Working Group discussion of this report:

- Comment: We should have lots of researchers involved in this group.
- Q: Is the letter of support for all of this or just for the NSF proposal?
A: Just for the NSF proposal.
- Q: Can I learn more about the acoustic monitoring? This could be helpful to help make decisions about what is really impacting caribou.

A: Acoustic monitoring is very non-invasive and we can analyze insects, aircrafts, blasting, etc. The goal is to put devices on caribou collars so we can tell what is really impacting their movements.

VIII. Communication Committee Update

Brittany Sweeney, FWS Outreach Specialist for the Selawik National Wildlife Refuge and a member of the Communications Committee, briefly presented information about the actions of the committee during the past year. For details, please refer to pages 144 of the binder.

Brittany led a brainstorming session about ideas for content for the 2024 Caribou Trails newsletter, which gets mailed to everyone in the range of the herd. Ideas/topics discussed include:

- The FSB and the BOG actions taken on the proposals.
- The caribou numbers are declining, and everyone needs to play a role in helping reduce the harvest – especially cows.
- Maybe some information about how other herds are also in decline.
- Print a section that reaches out to the public to ask for comments/information. Include contact information for who to contact.
- Include information on predators.
- Include lots of graphics – maybe about how many offspring one cow produces over time.
- Side by side maps of the caribou in abundance and the caribou in decline.
- Continue to share information about development projects in the herd's range.
- Info on climate change and how it is impacting caribou.
- Info about how transporters are working with agencies and their hunting is being monitored.
- Not all bulls are equal.
- How caribou are being impacted by road traffic-how the caribou have not acclimated to the Prudhoe Road.
- Article on caribou across the global arctic.
- Rain-on-snow article.

Communications Committee Membership – all WG members who want to participate should. You would be committing to 2 teleconferences between January and June.

IX. Business Meeting

Submit comments to BLM on Ambler Road SEIS as revised to include a paragraph about the fluctuation of the herd - MOTION by Neil DeWitt, second by Darrell Vent, to approve the SEIS Ambler Road comments as written by Tim Fullman. Motion PASSED on a roll call vote. Votes - Yes: 11; No: 1; Abstain: 3

Submit comments to support retaining the withdrawal of D1 lands - MOTION by Michael Stickman, second by Neil DeWitt, to submit comments written by Tim Fullman to support retaining the withdrawal of D1 lands. Motion PASSED on a roll call vote. Votes - Yes: 11; No: 0; Abstain: 4

Send Darrel Vent as a Working Group Representative to the Board of Game Meeting - MOTION by Cyrus Harris, second by Neil DeWitt, to send Darrell Vent to the Board of Game Meeting to represent the Western Arctic Caribou Herd Working Group. Motion PASSED unanimously by voice vote.

Write a letter to public safety officers around Anaktuvuk Pass - MOTION by Michael Stickman, second by Cyrus Harris, to write a letter to public safety officers around Anaktuvuk Pass about non-local takes and ask for better enforcement. Motion PASSED unanimously by voice vote.

Upload Conference Videos to Working Group Website - MOTION by Tim Fullman, second by Neil DeWitt, to upload as many conference videos as possible to the Western Arctic Caribou Herd Working Group website. Motion PASSED unanimously by voice vote.

Send a Working Group Representative to the Federal Subsistence Board Meeting - MOTION by Charlie Lean, second by Darrell Vent, to delegate the decision on working group representation at the Federal Subsistence Board meeting to the executive committee once more details are known. Motion PASSED unanimously by voice vote.

Write a letter of support to the National Science Foundation - MOTION by Neil DeWitt, second by Darrell Vent, to write a letter of support to the National Science Foundation to support Arctic System Sciences: Combining data streams across scales to investigate threats to caribou in a rapidly changing Arctic. Motion PASSED unanimously by voice vote.

Write letters to David Kilbourn Family, Benedict Jones, Elmer Seetot, Jr. and Pollock Simon, Sr. thanking them for their service on the Working Group - MOTION by Darrell Vent, second by Neil DeWitt, to write letters to David Kilbourn Family, Benedict Jones, Elmer Seetot, Jr. and Pollock Simon, Sr. thanking them for their service on the Working Group as founding members. Motion PASSED unanimously by voice vote.

Approval of 2022 WACH WG Meeting Summary (p. 179 in WG Binder) – MOTION by Neil DeWitt, second by Michael Stickman, to approve the 2022 WACH WG meeting summary. Motion PASSED unanimously by voice vote.

Communications Committee Slate – MOTION by Neil DeWitt, second by Darrell Vent, to approve the Communications Committee slate to include Darrell Vent, Tim Fullman, John Wisniewski, Vern Cleveland, Tom Gray, Ben Child, Deb Lawton (ADF&G), Brittany Sweeney (FWS), Kyle Joly (NPS), and a BLM rep to be identified by Brittany Sweeney. Motion PASSED unanimously by voice vote.

Executive Committee Membership Process – MOTION by Neil DeWitt, second by Darrell Vent to nominate executive committee members at Working Group Business Meetings and vote on the committee's membership at that time. Motion PASSED unanimously by voice vote.

Executive Committee Membership Nomination – MOTION by Tim Fullman, second by Cyrus Harris to nominate Charlie Lean for a seat on the Executive Committee.

Executive Committee Membership Nomination – MOTION by Vida Coltrain, second by Tim Fullman to nominate Darrell Vent for a seat on the Executive Committee.

Tom Gray asked for unanimous consent and there were no objections.

2024 WACH Working Group Meeting – The Working Group plans to meet in-person on December 11-12, 2024, in Anchorage. The Technical Committee will meet on December 10th in Anchorage. MOTION by Neil DeWitt, second by Tom Gray, to approve the 2024 WACH WG Annual Meeting dates and location. Motion PASSED unanimously by voice vote.

X. Adjourn – MOTION by Tom Gray, second by Neil DeWitt, to adjourn the meeting. Motion PASSED unanimously by voice vote.

Motions Acted Upon at WACH Working Group Meeting

December 13-14, 2023

1. Membership Approvals: MOTION by Micky Stickman, second by Neil DeWitt, to approve the following primary and alternate members to the WACH Working Group – Seat 5 primary John Wisniewski; Seat 9 primary Jack Reakoff; Seat 9 alternate Darrell Vent; Seat 20 alternate Joseph Leavitt. Motion PASSED unanimously on a voice vote.
2. Agenda Approval: MOTION by Cyrus Harris, second by Neil DeWitt, to approve the meeting agenda. Motion PASSED unanimously on a voice vote.
3. WACH Management Level, 2019 WACH Cooperative Management Plan: MOTION by Micky Stickman, second by Tom Gray, to accept the recommendation by the Technical Committee to set the Management Level for the Western Arctic Herd at “Preservative, Declining” per the 2019 WACH Cooperative Management Plan, Table 1. Motion PASSED on a roll call vote. Votes - Yes: 15; No: 0; Abstain: 0
4. Submit Comment to Board of Game Reaffirming Working Group’s Bag Limit Proposal: MOTION by Mickey Stickman, second by Neil DeWitt, to reaffirm the Working Group’s proposal (BOG Proposal 2) to the Board of Game to change harvest regulations to 4 caribou per person per year only one of which can be a cow. Motion PASSED on a roll call vote. Votes - Yes: 14; No: 1; Abstain: 0
5. Submit Comment to Board of Game Reaffirming Working Group’s Non-Resident Hunter Proposal: MOTION by Darrell Vent, second by Neil DeWitt, to reaffirm the Working Group’s proposal (BOG Proposal 5) to the Board of Game to close caribou hunting to non-residents range-wide. Motion PASSED on a roll call vote. Votes - Yes: 9; No: 6; Abstain: 0
6. Submit Comment to Board of Game Regarding BOG Proposal 4 to Align U23 (Pt Hope) with 26A submitted by the North Slope F&G Advisory Committee: MOTION by Neil DeWitt, second by Tim Fullman, to take no action on Proposal 4 with unanimous consent. Motion FAILED.
7. Submit Comment to Board of Game Regarding BOG Proposal 5 to Reduce Resident Harvest to 5/person, only 1 cow and create a NR registration permit for 400 hunters: MOTION by Neil DeWitt, second by Darrel Vent, to take no action on Proposal 5. Motion PASSED on a roll call vote. Votes - Yes: 13; No: 1.
8. Submit Comment to Board of Game Regarding BOG Proposal 18 to Open 22A for Caribou Harvest: MOTION by Darrel Vent, second by Neil DeWitt, to oppose Proposal 18. Motion PASSED on a roll call vote. Votes - Yes: 11; No: 3.
9. Submit Comment to Federal Subsistence Reaffirming Working Group’s Bag Limit Proposal (24-28): MOTION by Darrel Vent, second by Neil DeWitt, to reaffirm the Working Group’s proposal (FSB 24-28) to the Federal Subsistence Board to change harvest regulations to 4 caribou per person per year only one of which can be a cow. Motion PASSED on a roll call vote. Votes - Yes: 13; No: 1; Abstain: 0
10. Submit Comment to the Federal Subsistence Board Supporting Federal Proposal 24-30/31 (No non-federally qualified hunters for caribou August 1 to October 31 in Unit 23): MOTION by Darrel Vent, second by Cyrus Harris, to support Federal Proposal 24-30/31. Motion PASSED on a roll call vote. Votes - Yes: 10; No: 4; Abstain: 0
11. Submit comments to BLM on Ambler Road SEIS as revised to include a paragraph about the fluctuation of the herd: MOTION by Neil DeWitt, second by Darrell Vent, to approve the SEIS Ambler Road comments as written by Tim Fullman. Motion PASSED on a roll call vote. Votes - Yes: 11; No: 1; Abstain: 3

12. Submit comments to support retaining the withdrawal of D1 lands: MOTION by Michael Stickman, second by Neil DeWitt, to submit comments written by Tim Fullman to support retaining the withdrawal of D1 lands. Motion PASSED on a roll call vote. Votes - Yes: 11; No: 0; Abstain: 4
13. Send Darrel Vent as a Working Group Representative to the Board of Game Meeting: MOTION by Cyrus Harris, second by Neil DeWitt, to send Darrell Vent to the Board of Game Meeting to represent the Western Arctic Caribou Herd Working Group. Motion PASSED unanimously by voice vote.
14. Write a letter to public safety officers around Anaktuvuk Pass: MOTION by Michael Stickman, second by Cyrus Harris, to write a letter to public safety officers around Anaktuvuk Pass about non-local takes and ask for better enforcement. Motion PASSED unanimously by voice vote.
15. Upload Conference Videos to Working Group Website: MOTION by Tim Fullman, second by Neil DeWitt, to upload as many conference videos as possible to the Western Arctic Caribou Herd Working Group website. Motion PASSED unanimously by voice vote.
16. Send a Working Group Representative to the Federal Subsistence Board Meeting: MOTION by Charlie Lean, second by Darrell Vent, to delegate the decision on working group representation at the Federal Subsistence Board meeting to the executive committee once more details are known. Motion PASSED unanimously by voice vote.
17. Write a letter of support to the National Science Foundation: MOTION by Neil DeWitt, second by Darrell Vent, to write a letter of support to the National Science Foundation to support Arctic System Sciences: Combining data streams across scales to investigate threats to caribou in a rapidly changing Arctic. Motion PASSED unanimously by voice vote.
18. Write letters to David Kilbourn Family, Benedict Jones, Elmer Seetot, Jr. and Pollock Simon, Sr. thanking them for their service on the Working Group: MOTION by Darrell Vent, second by Neil DeWitt, to write letters to David Kilbourn Family, Benedict Jones, Elmer Seetot, Jr. and Pollock Simon, Sr. thanking them for their service on the Working Group as founding members. Motion PASSED unanimously by voice vote.
19. Approval of 2022 WACH WG Meeting Summary: MOTION by Neil DeWitt, second by Michael Stickman, to approve the 2022 WACH WG meeting summary. Motion PASSED unanimously by voice vote.
20. Communications Committee Slate: MOTION by Neil DeWitt, second by Darrell Vent, to approve the Communications Committee slate to include Darrell Vent, Tim Fullman, John Wisniewski, Vern Cleveland, Tom Gray, Ben Child, Deb Lawton (ADF&G), Brittany Sweeney (FWS), Kyle Joly (NPS), and a BLM rep to be identified by Brittany Sweeney. Motion PASSED unanimously by voice vote.
21. Executive Committee Membership Process: MOTION by Neil DeWitt, second by Darrell Vent to nominate executive committee members at Working Group Business Meetings and vote on the committee's membership at that time. Motion PASSED unanimously by voice vote.
22. Executive Committee Membership Nomination: MOTION by Tim Fullman, second by Cyrus Harris to nominate Charlie Lean for a seat on the Executive Committee.
23. Executive Committee Membership Nomination: MOTION by Vida Coltrain, second by Tim Fullman to nominate Darrell Vent for a seat on the Executive Committee. Tom Gray asked for unanimous consent and there were no objections.
24. Adjournment: MOTION by Tom Gray, second by Neil DeWitt, to adjourn the meeting. Motion PASSED unanimously by voice vote.

**Western Arctic Caribou Herd Working Group
Executive Committee Report
December 2024**

The Western Arctic Caribou Herd Working Group (WG) Chair and/or Executive Committee acted on the following items on behalf of the full WG since the December 2023 meeting:

1. December 21, 2023. As directed by WG action in December 2023, submitted a letter of support to the National Science Foundation for Dr. Donatella Zona and their research team for the project: Arctic System Sciences: Combining data streams across scales to investigate threats to caribou in a rapidly changing Arctic.
2. January 18, 2024. As directed by WG action in December 2023, submitted a comment letter to the Alaska Board of Game reaffirming support of proposals to limit the harvest of both bulls and cows by both resident and non-resident hunters to allow the herd population to recover.
3. January 22, 2024. Submitted a comment letter to the Northwest Arctic Regional Advisory Committee reaffirming previous proposals submitted to the Federal Subsistence Board to reduce the harvest of bulls and cows.
4. January 26 – 29, 2024. As directed by WG action in December 2023, Vice Chair Harris attended the Western Arctic/Western Region Alaska Board of Game Meeting in Kotzebue and provided testimony related to Working Group proposals submitted in 2023 to limit the harvest of both bulls and cows by both resident and non-resident hunters.
5. February 6, 2024. As directed by WG action in December 2023, submitted comments to the U.S. Department of the Interior, Bureau of Land Management to support retaining protections for D1 lands.
6. March 21, 2024. As directed by WG action in December 2023, submitted comments to the Federal Subsistence Board reaffirming support for WP24-28 and expressing support for WP24-30 and WP24-31.
7. September 18, 2024. Met via teleconference to discuss and identify topics for the 2024 Working Group meeting agenda.

Comments Submitted by WACH WG to BOG on 1/12/2024

The Western Arctic Caribou Herd (WACH) Working Group submitted two proposals in April of 2023, both of which are currently under consideration. These proposals recommend changes to caribou regulations due to data from ADF&G wildlife biologists that illustrate a decline in the WACH [Proposal 2: EG-F23-208 and Proposal 3: EG-F23-209].

At our annual meeting in December, we again learned from ADF&G biologists of the herd's continued decline. The 2023 photo census for the WACH was 152,000 down from 164,000 in 2022, 188,000 in 2021, and 244,000 in 2019.

We are commenting today to reaffirm our support for Proposal 2 and Proposal 3. We are reaffirming our support of these proposals because we see the immediate need to address the current herd decline by limiting the harvest of both bulls and cows by both resident and non-resident hunters to allow the herd population to recover.

Furthermore, the WACH Working Group reviewed other proposals under consideration, and we do not support Proposal 5. We understand that the intent of Proposal 5 is to reduce liberal harvest limits for residents while also continuing to allow access for all hunters (non-resident) by instituting quotas and enhances monitoring. However, we stand by our Proposal 3. We believe that if harvest reductions are placed on Alaskans to allow the herd to recover, there also should be reductions for non-resident hunters.

Note: This proposal is also scheduled for the March 15 – 22, 2024 Interior and Eastern Arctic Region meeting in Fairbanks, Alaska as Proposal 139. Units 22, 23, and 26A will be considered at the Western Arctic / Western Region meeting. The board may defer final action on all Units to the Interior and Eastern Arctic Region meeting.

PROPOSAL 2

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A to four caribou per year, only one of which may be a cow as follows:

RESIDENT HUNTERS: Four caribou [FIVE CARIBOU PER DAY] per year, however, no more than 1 cow may be taken.

What is the issue you would like the board to address and why? Data from biologists at ADF&G illustrate there has been continued decline in the Western Arctic caribou herd (WACH). The July 2022 photo census estimated 164,000 caribou in the Western Arctic caribou herd which is down from 188,000 in 2021. Census numbers for past years: 2020 – no census; 2019 – 244,000; 2018 – no census; 2017 – 259,000; 2016 – 201,000. In the two years between the 2019 and 2021 census, the herd declined nearly 12% per year. Additionally, data shows that the cow survival rate is at 71% in 2021, well below the herd’s average of 81% (1981-2020). ADF&G presented this information to the WACH Working Group in December 2022.

At its annual meeting the WACH Working Group assigned the management level “Preservative, Declining” to the herd based on the current census (within the range of 130,000-200,000) and adult cow survival rate less than 80%.

In doing so, the WACH Working Group sees the immediate need to address the current herd decline by limiting the harvest of both bulls and cows to allow the herd population to begin to recover.

In the game management units identified above, the current bag limit is set at five caribou per person per day during the open periods for bulls and cows. The WACH Working Group proposes to change regulations to four caribou per person per year, with no more than one cow allowed.

PROPOSED BY: Western Arctic Caribou Herd Working Group, Vern Cleveland, Chair (EG-F23-208)

Note: This proposal is also scheduled for the March 15 – 22, 2024 Interior and Eastern Arctic Region meeting in Fairbanks, Alaska as Proposal 140. Units 22, 23, and 26A will be considered at the Western Arctic / Western Region meeting. The board may defer final action on all Units to the Interior and Eastern Arctic Region meeting.

PROPOSAL 3

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Close nonresident caribou hunting in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A as follows:

The Western Arctic Caribou Herd working group (WACH WG) proposes to close caribou hunting in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A to non-Alaska residents.

NONRESIDENT HUNTERS: No open season [1 BULL].

What is the issue you would like the board to address and why? Data from biologists at ADF&G illustrate that there has been continued decline in the Western Arctic caribou herd (WACH). The July 2022 photo census estimated 164,000 caribou in the Western Arctic caribou herd which is down from 188,000 in 2021. Census numbers for past years: 2020 – no census; 2019 – 244,000; 2018 – no census; 2017 – 259,000; 2016 – 201,000. In the two years between the 2019 and 2021 census, the herd declined nearly 12% per year. Additionally, data shows that the cow survival rate is at 71% in 2021, well below the herd’s average of 81% (1981-2020). ADF&G presented this information to the WACH Working Group in December 2022.

At its annual meeting the WACH WG assigned the management level “Preservative, Declining” to the herd based on the current census (within the range of 130,000-200,000) and adult cow survival rate less than 80%. In doing so, the WACH WG sees the immediate need to address the current herd decline by limiting caribou harvest to allow the herd population to begin to recover.

In a separate proposal, the WACH WG proposes a reduction in harvest for resident hunters. The working group feels that if harvest reductions are placed on Alaskans to allow the herd to recover, there should also be harvest reductions for non-resident hunters.

Currently, in the game management units identified above, nonresident hunters are allowed to harvest one (1) bull per year. The WACH WG proposes to close caribou hunting in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A to nonresidents.

PROPOSED BY: Western Arctic Caribou Herd Working Group, Vern Cleveland, Chair (EG-F23-209)

Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

January 22, 2024

Lisa Hutchinson-Scarborough
Council Coordinator, Subsistence Regional Advisory Councils
R8 Northwest Arctic
USF&WS, Office of Subsistence Management

Re: Deferred Wildlife Proposals WP 24-28 and WP 24-29

Dr. Northwest Arctic Subsistence Regional Advisory Council,

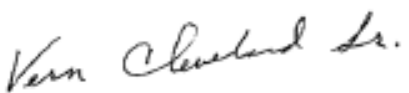
The Western Arctic Caribou Herd (WACH) Working Group submitted a proposal in April of 2023, which is currently under consideration as WP 24-28. This proposal recommends changes to caribou regulations due to data from wildlife biologists that illustrate a decline in the WACH.

At our annual meeting in December 2023, we again learned from ADF&G biologists of the herd's continued decline. The 2023 photo census for the WACH was 152,000 down from 164,000 in 2022, 188,000 in 2021, and 244,000 in 2019.

We are commenting today to reaffirm our support for WP 24-28. We are reaffirming our support of this proposal because we see the immediate need to address the current herd decline by limiting the harvest of both bulls and cows to allow the herd population to recover.

Furthermore, the WACH Working Group reviewed the other proposal under consideration (WP 24-29, and we do not support this proposal. We understand that the intent of WP 24-29 is to focus harvest reductions on Unit 23 only, however, we believe that harvest reductions should be implemented across the entire range of the WACH.

Sincerely,



Vern Cleveland, Sr., Chair
Western Arctic Caribou Herd Working Group

Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

March 21, 2024

RE: Comments from the Western Arctic Caribou Herd Working Group for April 2 – 5, 2024 Federal Subsistence Board Meeting

Dear Members of the Federal Subsistence Board,

The Western Arctic Caribou Herd (WACH) Working Group submitted a proposal on April 10 of 2023 which is currently under consideration. The proposal recommends changes to caribou regulations due to data from ADF&G wildlife biologists that illustrate a decline in the WACH [WP24-28].

At our annual meeting in December, we again learned from ADF&G biologists of the herd's continued decline. The 2023 photo census for the WACH was 152,000 down from 164,000 in 2022, 188,000 in 2021, and 244,000 in 2019.

We are commenting today to reaffirm our support for WP24-28. We are reaffirming our support because we see the immediate need to address the current herd decline by limiting the harvest of both bulls and cows, in all the units where the Western Arctic Caribou Herd travels, to allow the herd population to recover.

Furthermore, the WACH Working Group reviewed other proposals under consideration. We would like to express our support for WP24-30 and WP24-31. We believe that if harvest reductions are placed on federally qualified users to allow the herd to recover, there also should be reductions for non-federally qualified users.

Sincerely and on behalf of the Working Group,



Vern Cleveland, Sr., Chair
Western Arctic Caribou Herd Working Group