

## Unit 23 Working Group May 8-9, 2013

Northwest Arctic Borough Assembly Chambers  
163 Lagoon Street, Kotzebue, Alaska

Wednesday, May 8  
3:00 – 6:00 p.m.

Thursday, May 9  
9:00 a.m. – 5:00 p.m.

**Public radio station KOTZ will broadcast the meeting on  
Wednesday, May 8, 3:00-6:00 pm and Thursday, May 9, 9:00 am-4:00 pm  
Tune to 89.9 FM or AM 720, or listen via the web at [www.kotz.org](http://www.kotz.org)**

### AGENDA

#### Meeting Topics

- Update on Western Arctic Herd population and harvest data
- Discuss 2012 hunting season & preparation for 2013 season
- Update on State and federal management, planning and enforcement related to reducing hunting conflicts in Game Management Unit 23
- Presentation regarding proposed Roads to Resource projects
- Public comment session – By phone or at Assembly Chambers  
Thursday, May 9, 1:15 – 2:00 p.m.
- Discussion of additional topics raised by Working Group members

#### **Wednesday, May 8**

Coffee/Refreshments

*Note that Wednesday, 3:00-6:00 pm, the meeting will be broadcast on KOTZ and online at [www.kotz.org](http://www.kotz.org)*

#### **3:00 p.m. Welcome, Introductions – Review Agenda / Revise if necessary**

- List of Unit 23 Working Group members (*Attachment 1*)
- Status of recommendations made by the Working Group at past meetings (*Attachment 2*)
- Reminder of Board of Game schedule for Arctic/Western Region  
– Board meeting January 10-13, 2014 in Kotzebue

**3:20 p.m. 2012 Hunting Season & Data**

- Caribou population data and 2012 harvest data  
Jim Dau, Alaska Department of Fish & Game (ADF&G)
- Working Group comments/discussion regarding 2012 hunting season and preparation for 2013

**4:30 p.m. Break**

**4:45 p.m. Communication, Coordination & Enforcement**

- Enforcement report to Alaska State Legislature from the Alaska Department of Commerce and Economic Development (DCCED): report prepared by investigator who gathered information about transporter conduct in Unit 23 in 2012 (*Attachment 3*)  
Lee Strout, DCCED
- Enforcement coordination between National Park Service, Bureau of Land Management, US Fish and Wildlife Service, Alaska State Troopers, NANA Village Trespass  
Dan Stevenson, National Park Service
- Working group comments/discussion regarding communication and enforcement

**5:30 p.m. Update on State of Alaska Guide Concession Program**

Valerie Baxter, Alaska Dept. of Natural Resources (DNR)

**6:00 p.m. Adjourn for the day**

**Thursday, May 9**

Coffee/Refreshments

*Note that Thursday, 9:00 am – 4:00 pm, the meeting will be broadcast on KOTZ and online at [www.kotz.org](http://www.kotz.org)*

**9:00 a.m. Welcome / Agenda Review / Announcements**

- 9:05 a.m. Education Update** – Update on pilot education requirement (regulation in effect 2010-2012 hunting seasons), youth education, hunter education, *Caribou Trails*  
Meghan Nedwick, ADF&G

**9:30 a.m. Update on State & Federal Management, Planning & Permitting – Agency presentations and Working Group discussion**

- Squirrel River Management Plan  
Shelly Jacobson, Bureau of Land Management
- Selawik National Wildlife Refuge  
Lee Anne Ayres, US Fish and Wildlife Service

**10:20 a.m. Break**

**10:40 a.m. Continue State & Federal Agency Update**

- Noatak National Preserve  
Frank Hays, National Park Service
- Noatak Caribou Traditional Knowledge Project  
Gabriela Halas and Gary Kofinas, University of Alaska  
Fairbanks
- Working Group comments / discussion related to State and Federal management updates

**12:00 p.m. Lunch**

**1:15 p.m. Public Comment Opportunity regarding user conflicts related to hunting in Game Management Unit 23 – Telephone Call-In & In-person Comments**

Comments by phone, dial 1-800-315-6338, enter code 2323#

To participate in Kotzebue, please come to the NWAB Assembly Chambers. Time per comment may be limited, to ensure opportunity for those who want to speak.

**2:00 p.m. Western Arctic Caribou Herd movements near roads**

Jim Dau, ADF&G

**2:45 p.m. Break**

**3:00 p.m. Roads to Resources**

- Presentation by the Alaska Industrial Development and Energy Authority (AIDEA) regarding proposed Roads to Resources projects in the region, at the request of the Working Group.

Mark Davis and Mike Catsi, AIDEA

John Moller, Office of the Governor

Marie Steele, DNR, Office of Project Management and Permitting

- Working Group questions and discussion regarding Roads to Resources.

*(Attachment 4 is July 2012 letter from Unit 23 Working Group to Alaska Department of Transportation & Public Facilities)*

**4:15 p.m. Final Discussion Items / Wrap-up**

**5:00 p.m. Adjourn**

Additional information about the Unit 23 Working Group can be found at the project web site:

<http://www.adfg.alaska.gov/index.cfm?adfg=wildlifeplanning.unit23>

## Unit 23 Working Group Membership

May 2013

<b>Name</b>	<b>Affiliations</b>
Lee Anne Ayres	U.S. Fish and Wildlife Service
Jim Dau	Alaska Department of Fish and Game
Phil Driver	Alaska Professional Hunting Association Western Arctic Caribou Herd Working Group
Cyrus Harris	Maniilaq Association Western Arctic Caribou Herd Working Group
Frank Hays	National Park Service
Stosh Hoffman	Board of Game
Shelly Jacobson	Bureau of Land Management
Victor Karmun	Northwest Arctic Regional Advisory Council Kotzebue Sound Advisory Committee
Melvin Lee	Upper Kobuk Advisory Committee
Valerie Baxter	Alaska Department of Natural Resources
Enoch Mitchell	Noatak/Kivalina Advisory Committee
Ron Moto, Sr.	North Seward Peninsula Advisory Committee
Noah Naylor	Northwest Arctic Borough
Julie Owen	Transporter representative
Pete Schaeffer	Kotzebue Sound Advisory Council
Joe Schuster	Alaska Professional Hunting Association
Ted Spraker	Alaska Board of Game
Raymond Stoney	Northwest Arctic Regional Advisory Council Lower Kobuk Advisory Committee
Tim Towarak	Federal Subsistence Board
Alex Whiting	Kotzebue IRA

## Game Management Unit 23 Working Group

### Summary of Process and Advisory Recommendations Made to Date by the Working Group

May 2013

Background: Fall hunting in Unit 23 in northwest Alaska has been the subject of some conflict since the early 1980s, particularly between local hunters, visiting hunters and commercial operators providing guide and/or transport services. The Unit 23 Working Group formed in early 2008 to improve communication about issues related to fall hunting and to work cooperatively toward solutions that all can support.

Representation: The Working Group's 20 members include representatives of regional and tribal governments and organizations, state and federal land and wildlife management agencies, hunting guide and transporter services, Fish and Game Advisory Committees (AC), Northwest Arctic Regional Advisory Council, Board of Game, and Federal Subsistence Board.

Purpose: The Working Group's charter states that the purpose of the group is to *find solutions to hunting conflicts that will preserve the Inupiaq values of the region, including opportunities for local hunters to take caribou as needed, while also providing reasonable opportunities for visiting hunters to hunt caribou in the unit.*

The Working Group has no authority of its own, but makes *advisory* recommendations to the regulatory agencies and boards that manage hunting, land use and wildlife in Unit 23, and communicate with the public about these issues. The group works to reach consensus agreement on its recommendations.

#### Working Group Meetings and Public Input (2008-2013):

- Meetings in Kotzebue: April 2008, October 2008, January 2009, April 2009, May 2010, May 2011, May 2012, May 2013
- Kiana & Noatak: May 2008 meeting with AC and community
- Shungnak: January 2009 meeting with AC and community
- Working Group teleconference (prep. for Board of Game meeting): October 2009
- Public input through written comments; emails; comment at meeting and via teleconference. Project website:  
<http://www.adfg.alaska.gov/index.cfm?adfg=wildlifeplanning.unit23>

Issues: The Unit 23 Working Group has discussed a wide range of issues, brought to the table by group members and the public. Key issues discussed have included (not listed in priority order):

- Management of high use areas hunted by both local and visiting hunters
- Potential disruption of caribou migration by human activities

- Importance of subsistence hunting
- Importance of proper meat care
- Coordination of agency management of lands, use and access
- Importance of having the data and regulatory tools needed to manage human use
- Coordination of enforcement of wildlife and land management regulations

Recommendations: During its meetings from April 2008 – May 2012, the Working Group developed the following consensus recommendations. The first two recommendations were regulatory proposals to the Board of Game that were approved by the Board in November 2009. The other recommendations were directed to regulatory or management agencies for consideration and action. The following table indicates the status of each recommendation as of April 2013.

Recommendation	Status of Recommendation – as of April 2013
<p><b>Expand dates of Noatak Controlled Use Area (CUA) to August 15-September 30</b> (from prior dates of August 25-September 15.)</p>	<ul style="list-style-type: none"> <li>• <u>Noatak CUA date change approved by Board of Game</u>, November 2009. Regulation in effect.</li> </ul>
<p><b>Mandatory one-time orientation of pilots flying in Unit 23</b> for the purpose of transporting hunters or game beyond state maintained airports.</p>	<ul style="list-style-type: none"> <li>• <u>Pilot orientation requirement approved by Board of Game</u>, November 2009. Regulation in effect beginning July 2010. ADF&amp;G reported in May 2012 that 200 pilots had taken the test, including 173 Alaska residents and 27 non-residents.</li> <li>• At the request of the Working Group, <u>ADF&amp;G surveyed pilots in 2012 regarding the orientation requirement</u>. Results: <ul style="list-style-type: none"> <li>– 70% found the orientation helpful to very helpful; 30% not helpful.</li> <li>– 62.5% said it made them aware of user conflict issues they had not known about before; 17.5% learned no new information about user conflicts</li> <li>– 45% said it would help them operate their aircraft in a way to avoid user conflicts; 30% said it would not; 25% did not answer this question</li> </ul> </li> </ul>
<p><b>Improve communication</b> between local communities and management and enforcement agencies, and the guides, transporters and non-local hunters who come to the region each fall.</p>	<ul style="list-style-type: none"> <li>• <u>Agencies provide a consistent and complete package of information to guides, transporters and visiting hunters</u> before each season about ways to avoid conflict while hunting, meat care, sensitive areas in Unit 23 that should be avoided, current land status maps (digital on DVD provided annually by Bureau of Land Management), and other topics.</li> <li>• <u>Annual preseason meeting / teleconference with local communities is held in August of each year</u>, to let them know which commercial service businesses are expected to operate in different areas of Unit 23 during the hunting season. Meeting is hosted by the Northwest Arctic Borough (NWAB). Agencies managing permits for guides and transporters provide information to public.</li> </ul>

Recommendation	Status of Recommendation – as of April 2013
<p><b>Improve coordination among federal and state management agencies</b> with responsibility for management of wildlife, land and commercial hunting services in Unit 23 and enforcement of regulations and permit conditions.</p>	<ul style="list-style-type: none"> <li>• As noted above, there is an <u>annual pre-season meeting</u> in August, with local communities, the NWAB and agencies regarding the commercial hunting services permitted by each agency.</li> <li>• <u>Expansion and coordination of law enforcement efforts</u> (e.g., including working with the NANA Trespass program, coordination with the contract investigator, expanding agency presence at the Kotzebue airport ramp, and increasing air patrols in the unit). In 2011, the Working Group suggested that agencies communicate more with guides and transporters that operate in Unit 23 (particularly Upper Kobuk area) but are not based in Kotzebue (e.g., Fairbanks, Bettles). (This has not yet been done.)</li> <li>• In 2010-2012, the Alaska Department of Commerce, Community and Economic Development (DCCED) has had an <u>investigator in Unit 23 during the fall hunting season to focus on transporter activities in Unit 23</u> and prepare an annual report to the Legislature. In 2010-2011, the Legislature provided special funding for a contract investigator. In 2012, DCCED used a staff investigator employed by the agency. The investigator has worked closely with other law enforcement agencies. The report for 2012 will be presented at the May 2013 Unit 23 Working Group meeting.</li> <li>• <u>Coordination of federal management plans and permitting</u> that affect the number and distribution of guides and transporters operating in Unit 23, including: <ul style="list-style-type: none"> <li>– Bureau of Land Management is preparing a plan for the <u>Squirrel River Special Management Area</u> that will address user conflicts and commercial service providers. The NWAB and DNR have been participating in this planning process, as well as representatives of affected local communities (Kiana, Noorvik, Noatak).</li> <li>– US Fish and Wildlife Service’s <u>Selawik National Wildlife Refuge Comprehensive Conservation Plan, completed in September 2011</u>, addresses conflicts among hunters and trespass on private lands by identifying an area in the western part of the refuge where permits will not be granted by the USFWS for commercial guides and transporters for big game hunting. The mixed land ownership in this area (private, public) combined with the presence of many Native allotments, justified this proactive approach to management of commercial uses in the refuge. The planning team included representatives of NWAB, the NANA Trespass Program, and federal and state management agencies.</li> </ul> </li> </ul>

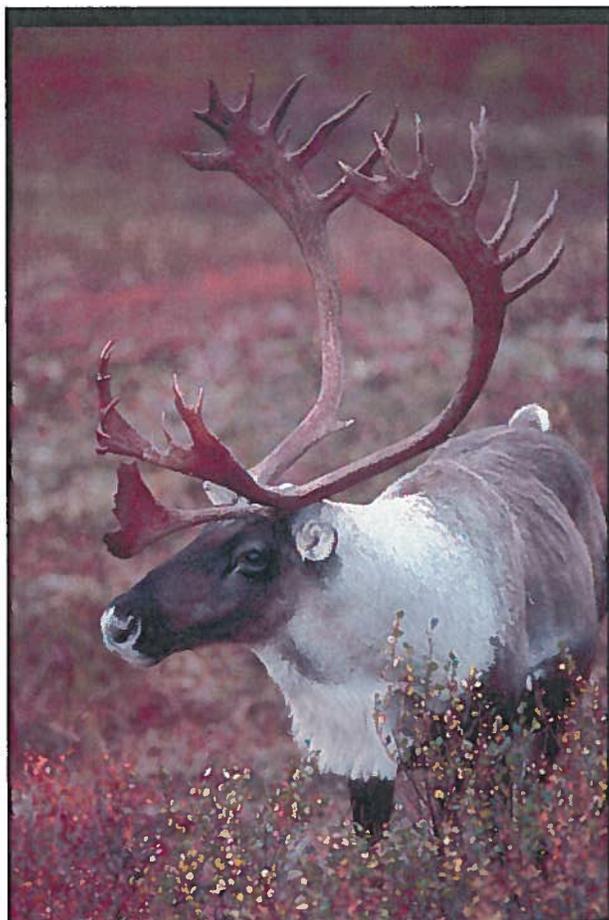
Recommendation	Status of Recommendation – as of April 2013
	<ul style="list-style-type: none"> <li>- The <u>National Park Service</u> will provide a briefing at the May 2013 meeting regarding the process they used for <u>commercial use permitting in the Noatak Preserve in fall 2012</u>. The NPS is also conducting a survey regarding public use in the Noatak National Preserve for caribou hunting, and a study of traditional knowledge about caribou in the Noatak. The results of these studies will inform future management in the Preserve.</li> <li>• <u>The federal management agencies have developed consistent permit stipulations and reporting requirements for transporters</u> that address ways to avoid or reduce conflicts during the hunting season, and streamlining of reporting requirements.</li> </ul>
<p><b>Track proposed development projects that may affect caribou populations, migration, hunting, access, and user conflicts.</b></p>	<ul style="list-style-type: none"> <li>• The <u>Unit 23 Working Group</u> is keeping informed on potential development of <u>Roads to Resources in the Northwest Arctic region</u>, through presentations by the Alaska Department of Transportation &amp; Public Facilities (ADOT&amp;PF) in 2012 and the Alaska Industrial Development and Export Authority (AIDEA) in May 2013. In July 2012, the group wrote to the Commissioner of ADOT&amp;PF recommending that the State evaluate and address potential impacts on caribou population size, movement, hunting access and harvest levels, potential for increased user conflicts, and cumulative effects.</li> </ul>
<p><b>Support development of Guide Concession Program by Alaska Department of Natural Resources (DNR), and expand that program to include transporters.</b></p>	<ul style="list-style-type: none"> <li>• In January 2013, DNR issued the <u>Guide Concession Program, Management Framework Document</u>. During development of this framework, the Working Group commented in support of the program and recommended it be expanded to include management of transporters. The 2013 framework does not address transporters and air taxis. However, it states that “DNR is committed to further research and evaluation of the issues and need for potential management strategies surrounding this industry.”</li> </ul>
<p><b>Expand statutory authority of Big Game Commercial Services Board (BGCSB) to regulate transporters, and change the definition of “transportation services” to require air taxis that carry big game hunters submit transporter activity reports to State of Alaska.</b></p>	<ul style="list-style-type: none"> <li>• In 2010, the Alaska State Legislature considered, but did not pass, a bill that would have expanded authority of the Big Game Commercial Services Board to regulate transporters. The bill did not address the definition of “transportation services”.</li> </ul>
<p><b>Improve data regarding hunting, guiding and transporting activity to help in management decisions – with particular focus on information about the location of human activity in the field during the hunting season (camps, drop-off and pick-up points).</b></p>	<ul style="list-style-type: none"> <li>• The Working Group has <u>recommended that the State Department of Commerce, Community and Economic Development (DCCED) require guides and transporters to annual report the locations (lat./long) of camps, drop-off and pick-up sites they use in Unit 23</u> so that there can be maps created that show these locations during the hunting season. It has not been possible to get this data consistently, nor to have it provided in a database that can be used to prepare maps, due</li> </ul>

<b>Recommendation</b>	<b>Status of Recommendation – as of April 2013</b>
	<p>to limited DCCED staff capacity.</p> <ul style="list-style-type: none"><li>• DCCED does ask guides and transporters to <i>voluntarily</i> report information about locations (lat./long.) of drop-off and pick-up sites and camps in Unit 23.</li><li>• NPS and USFWS require guides and transporters to provide lat/long information for camps and pick-up/drop-off points in their special use permit reports. BLM requires this of guides operating on BLM land, and of transporters operating in the Squirrel River area. This information is generally <i>not</i> required on State lands (only for camps in place for &gt; 14 days) due to limits on the state’s permitting requirements.</li></ul>

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Department of Commerce, Community, and Economic Development

**BIG GAME COMMERCIAL SERVICES BOARD**  
**GMU 23 Working Group**  
**Investigation and Enforcement Services**  
**Report**



**February 2013**

Division of Corporations, Business and Professional Licensing  
Big Game Commercial Services Board

[www.commerce.alaska.gov/ooc/pgui.htm](http://www.commerce.alaska.gov/ooc/pgui.htm)

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## EXECUTIVE SUMMARY

Wildlife Resource Management in Alaska is accomplished through the cooperative efforts of Alaska's Departments of Commerce, Community and Economic Development (DCCED), Fish and Game, and Public Safety. Collaboration between these state departments, as well as with federal wildlife management agencies and other stakeholders, is an important part of the stewardship of Alaska's wildlife.

The Big Game Commercial Services Board (Board), administered through DCCED, regulates and licenses the big game commercial service industry in Alaska. The Board also enforces its regulations through investigative and possible disciplinary action against commercial operator licensees who violate licensing laws.

The Division of Corporations, Business and Professional Licensing (Division) monitors compliance with Board regulations through investigative and enforcement efforts conducted by an investigative unit. One permanent investigator assigned to the Board is responsible for investigation and enforcement efforts within Alaska's 26 game management units (GMUs).

In 2008, the Board was invited to participate in a 21-member<sup>1</sup> working group established to address hunting game management concerns in the area encompassing Kotzebue Sound and the Chukchi Sea, known as Game Management Unit 23 (GMU 23)<sup>2</sup>. These concerns centered around the conduct of commercial operators such as Big Game Guides, Transporters and Air Taxis and their involvement in the wasting of game meat, unlicensed activities, and remaining in the field with their clients.

The assigned Investigator traveled into GMU 23 to conduct interviews, camp inspections, field contacts, ramp checks, and other professional licensing investigative activities on these commercial operators in 2010, 2011 and 2012. The Division also hired a seasonal Investigator to assist with investigation, enforcement, and reporting of possible violations of statutes and regulations jurisdictional to the Big Game Commercial Services Board during these same years.

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<sup>1</sup> See Appendix A, GMU 23 Working Group

<sup>2</sup> See Appendix B, GMU 23 Map

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## OBJECTIVES

1. Conduct field inspections within GMU 23 to verify licensees' compliance with statutes and regulations jurisdictional to the Big Game Commercial Services Board.
2. Interview hunters to determine if any transporter violations, game animal waste, or any other illegal activity had occurred during their hunt as well as review the quality of their hunting experience in Alaska.
3. Investigate, enforce, and report any violation of statutes and regulations jurisdictional to the Big Game Commercial Services Board.
4. Coordinate with state and federal wildlife management agencies and regional organizations to investigate possible big game hunting permit violations for commercial operations on public lands.

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## RESULTS

### **OBJECTIVE 1: Conduct field inspections within GMU 23 to verify licensees' compliance with statutes and regulations jurisdictional to the Big Game Commercial Services Board.**

- The Division investigator traveled within GMU 23 during the peak of the 2012 caribou hunting season. During that time, he met with transporters, air taxi operators, and guides to verify they were correctly licensed and in compliance with big game hunting laws. The investigative and enforcement results of his field inspections are discussed below.
  - While in the field, the investigator observed or uncovered minor violations involving both transporters and guides. These were violations that could be easily corrected on site, such as hunt records being incomplete, or a camp that was not being kept up to the Department of Natural Resources or Bureau of Land Management requirements. The violations were corrected by the licensees, and no further action was necessary.
  - The Investigator assisted several Guides/Transporters in interpreting/clarifying statute/regulation intent. To include but not limited to, *AS 08.54.720(a)(17)(B)* Guide's Harvest of Big Game with clients in the field and *AS 08.54.720(a)(15)* Waste of a Wild Food Animal.
  - It was noted that two of the larger Transporter Outfits at the Kotzebue Airport have added meat processing tents and equipment for their client's use; this was directly in response to several questions/complaints raised by clients during 2011 contacts with the Division Investigator concerning the lack of meat processing facilities in the area.

### **OBJECTIVE 2: Interview hunters to determine if any transporter violations, game animal waste, or any other illegal activity had occurred during their hunt as well as review the quality of their hunting experience in Alaska.**

- The Division investigator interviewed approximately 24 hunters at various locations at which hunters gather. The interviews were conducted at hunters' camps, the Kotzebue airport, restaurants, hotels, and on the street.
- Hunters were asked about methods used to get to and from the field, whether they were bringing in the required harvested meat, and concerns or issues that may have arisen during the hunt. Most were pleased with the services they were receiving, except for one transported party of non-resident caribou hunters who complained of the excessive amount of brown bears in the area of their camp. This party was subsequently relocated by their Transporter.

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- Statute and Regulations interpretation and intent were discussed in these contacts.

### **OBJECTIVE 3: Investigate, enforce, and report any violation of statutes and regulations jurisdictional to the Big Game Commercial Service Board.**

- The investigator's efforts were hampered by the inability to obtain unescorted access to the aircraft ramp where a majority of the transporter and air taxi activity takes place.
- A transporter was investigated for his involvement/knowledge in the possible harvest of a sublegal moose by his clients. The case was referred to Department of Public Safety and the transporter's culpability was ruled out.
- A transporter was investigated for his involvement/knowledge in the wanton waste of a caribou harvested by his clients. The case was referred to Department of Public Safety and the transporter's culpability was ruled out.
- An investigation was initiated into a transporter crossing the line between his transporter business and his guiding operation. The case remains open, and a license action is anticipated.

### **OBJECTIVE 4: Coordinate with state and federal wildlife management agencies and regional organizations to investigate possible big game hunting permit violations for commercial operations on public lands.**

- The Division investigator traveled with the Alaska Wildlife Troopers to check field camps of operators within GMU 23. He spent four days on patrol with Alaska Wildlife Troopers.
- A flight patrol was coordinated with the U.S. Bureau of Land Management personnel to investigate trespass issues by operators registered with the State of Alaska verifying the proper use of eight permitted camps by licensed guides.
- The investigator assisted with enforcement efforts between Alaska Wildlife Troopers, US Fish and Wildlife and a Guide who complained of two clients that were being harassed by a local hunter.
- The investigator met with representatives from the State of Alaska Wildlife Enforcement, State of Alaska Fish and Game, U.S. Fish and Wildlife, Bureau of Land Management, The Northwest Arctic Borough, and the NANA Regional Corporation on investigations and issues of concern over unlicensed guiding activities were discussed. The general consensus was the investigator's presence has decreased the concerns of wanton waste issues by licensed guides and transporters and continued presence during peak activity time is desired.

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**SUMMARY**

The Division of Corporations, Business and Professional Licensing investigator traveled to the Kotzebue area to investigate concerns of wanton waste and the level of illegal and/or unlicensed activity in GMU 23 jurisdictional to The Big Game Commercial Service Board. Approximately 24 hunters were surveyed to determine what methods were being used to get to and from the field. The investigator also looked into how hunters were harvesting their game animals. Field inspections of transporters and guides were conducted to ensure compliance with hunting laws and minor violations were corrected in the field. Serious violations have been or will be brought before the Big Game Commercial Services Board.

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Game Management Unit 23  
Working Group  
114 S. Franklin St., Ste. 203  
Juneau, AK 99801

July 10, 2012

Commissioner Marc Luiken  
Alaska Department of Transportation and Public Facilities  
P.O. Box 112500  
Juneau, AK 99811-2500

Dear Commissioner Luiken:

As the Alaska Department of Transportation and Public Facilities (DOT&PF) evaluates the feasibility of various alternatives to access the Ambler Mining District and other “Roads to Resources” projects in Northwest Alaska, the Game Management Unit 23 Working Group would like to submit the following requests.

The Unit 23 Working Group was formed in 2008 to discuss fall hunting conflicts between local hunters, nonlocal hunters and big game commercial service providers (guides, transporters) in Game Management Unit 23, in northwest Alaska. The group works together by consensus to identify ways to reduce fall hunting conflicts in Unit 23 and protect subsistence uses, while providing opportunities for non-local hunters. The 20-member Working Group includes representatives from local Fish and Game Advisory Committees, the Big Game Commercial Services Board and Alaska Professional Hunters Association, regional and tribal governments and organizations, land and wildlife management agencies, the Northwest Arctic Subsistence Regional Advisory Council, the Alaska Board of Game, and the Federal Subsistence Board. The group has sent numerous advisory recommendations to government agencies, regulatory boards, and others for these entities to evaluate and consider for implementation. Additional information about the group can be found at its website: <http://www.adfg.alaska.gov/index.cfm?adfg=wildlifeplanning.unit23>

At the Unit 23 Working Group’s May 2012 meeting, DOT&PF project staff Ryan Anderson and Paul Karczmrczyk presented information regarding planning for a proposed road to access the Ambler Mining District. The Working Group appreciated that DOT&PF staff came to Kotzebue to present information about the project and engage in constructive discussion. The meeting provided an opportunity for the Working Group to consider and discuss the potential effects of a road and increased public access to the region on the Western Arctic Caribou Herd (WACH) and its migration, the distribution and intensity of hunting in the region, and the level of conflicts between local subsistence hunters and non-local hunters who visit the region.

The Unit 23 Working Group believes that it is important that the State of Alaska consider projected impacts of new roads on the caribou herd and the people who depend upon it for food security. The following potential impacts must be fully evaluated before decisions are made on road construction, routine, access rights, and rules of operation:

1. Road impacts on the WACH, including changes in movements, distribution, and population size in response to infrastructure, disturbance and hunting pressure.

2. Impacts of roads on hunting access for local residents and visiting hunters, including anticipated changes in harvest levels and areas used by hunters.
3. The potential for increased hunting access to worsen conflicts between local and non-local hunters.
4. Cumulative effects of all road and development projects within the range of the WACH on the herd and use of the herd, particularly for subsistence users.

Similar concerns were raised in an April 20, 2012 letter from the Western Arctic Caribou Herd Working Group to Governor Parnell regarding the Roads to Resources projects.

The Working Group requests that no decision be made regarding whether to establish new roads in northwest Alaska and the extent to which those roads will be open to general public access, until there is a full evaluation of these potential affects.

Thank you very much for your consideration of the Unit 23 Working Group's request. We look forward to your response.

Regards,

Unit 23 Working Group

Unit 23 Working Group Members (May 2012):

Phil Driver, Alaska Professional Hunters Association, Western Arctic Caribou Working Group  
Cliff Judkins, Alaska Board of Game  
Cyrus Harris, Maniilaq Association  
Victor Karmun, Northwest Arctic Subsistence Regional Advisory Council, Kotzebue Sound Advisory Committee  
Melvin Lee, Upper Kobuk Advisory Committee  
Enoch Mitchell, Noatak/Kivalina Advisory Committee  
Ron Moto, Sr., North Seward Peninsula Advisory Committee  
Noah Naylor, Northwest Arctic Borough  
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Zazell Staheli, Transporter representative  
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Tim Towarak, Federal Subsistence Board  
Alex Whiting, Kotzebue IRA  
Jim Dau, Alaska Department of Fish and Game  
Valerie Baxter, Alaska Department of Natural Resources  
Lee Anne Ayres, US Fish and Wildlife Service  
Frank Hays, National Park Service  
Shelly Jacobson, Bureau of Land Management

cc: Ryan Anderson, DOT&FF  
Paul Karczmrczyk, DOT&PF