

**North Slope Subsistence Regional Advisory Council**  
c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
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In Reply to:  
NSRAC.A24116

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

Dear Chairman Christianson:

The North Slope Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2024 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held on August 19 – 20, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its February 27 – 28, 2025 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the North Slope Region.

**1. Funding to Conduct Muskox Monitoring within the North Slope Region**

The Council considers muskoxen an important subsistence resource that should be closely monitored to provide adequate harvest opportunities while maintaining desirable population levels. The Council relies on the best available data to make informed decisions and provide recommendations on regulatory actions that will impact muskoxen and harvest opportunities for federally qualified subsistence users. For this same reason, the Council believes that annual population surveys of muskoxen across the region and across different jurisdictions are absolutely necessary. The Alaska Department of Fish and Game (ADF&G) conducted its last muskox population surveys in Unit 26A in 2022. Unit 26C, however, is encompassed almost entirely within the boundaries of the Arctic National Wildlife Refuge (Refuge), and the Refuge has not conducted population surveys for muskoxen since 2016. Considering the recent increases in the Eastern North Slope population of muskox in Unit 26B, the Council believes that the existing harvest limits set in the region may be based on incomplete or outdated data.

### Request to the Board

The Council requests the Board to make funding available to study and conduct annual population surveys for muskoxen across all units within the North Slope region. The Council believes that a Wildlife Resource Monitoring Program should be established to provide funding that will help address gaps in information about important subsistence wildlife resources such as muskoxen. Likewise, establishing such a program may improve access to subsistence harvest opportunities and provide land managers the flexibility to address any conservation concerns in a timely manner. The Council envisions that such funding could also support other research needs that integrates local knowledge, such as the correlation between the presence of muskoxen and the absence of caribou within an area, as reported by local observers on multiple occasions.

### **2. Funding to Study the Effects of Transported and Guided Hunters on Subsistence and Caribou in the North Slope Region**

The Council continues to be concerned about the impacts of transporter companies, guided and non-federally qualified (sport) hunters on caribou and subsistence practices in the North Slope region. The Council has witnessed increased conflicts between federally qualified subsistence users and non-federally qualified users over caribou, mainly during the fall hunt season. For instance, the Council and community members continue to observe non-federally qualified hunters disturbing caribou with low-flying aircraft or other unsportsmanlike behaviors such as barricading areas and diverting caribou. Additionally, the Council has heard many reports from community members of wanton waste of caribou and has reported spoiled meat being disposed of in village dumpsters and carcasses without antlers. Locals consider these actions highly disrespectful because our people continue to experience hardships due to high levels of food insecurity. The Council considers it necessary to monitor conflicts between users and quantify the impacts of non-federally qualified subsistence on subsistence harvests and caribou.

### Request to the Board

The Council requests the Board to make funding available to study the impacts of guided hunters, transporter companies, and non-federally qualified hunters in the North Slope region. More specifically, the Council is interested in understanding their impacts on caribou, as well as their effects on our residents' subsistence practices. The Council firmly believes that establishing a Wildlife Resource Monitoring Program will benefit the Federal Subsistence Management Program and help inform Federal and State regulatory changes around caribou in the region.

**The remainder of this report is for informational purposes only and the Council does not require a response; however, the issues are important, and the Board may benefit from this knowledge.**

### **3. Establish a Caribou Commission for the North Slope Region**

The Council would like to inform the Board of our objective to create a North Slope Caribou Commission to promote the conservation and management of caribou herds that support subsistence needs and encourage necessary research that addresses local concerns and traditional

knowledge. The Council feels the needs of subsistence users of the North Slope region are not adequately addressed through State and Federal Management, which fail to integrate traditional knowledge into management decisions. The Council plans to introduce this topic to the North Slope Borough Fish and Game Management Committee to initiate the discussion, identify next steps, and possibly identify members to form such a commission.

The Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the North Slope Region. If you have any questions regarding this report, please contact me via Gisela Chapa, Subsistence Council Coordinator, Office of Subsistence Management, at [gisela\\_chapa@ios.doi.gov](mailto:gisela_chapa@ios.doi.gov), or 1-800-478-1456, or (907) 310-6129.

Sincerely,

Brower Frantz,  
Chair

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