



Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199



In Reply Refer To:
OSM.A25014

AUGUST 25 2025

Brower Frantz, Chair
North Slope Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Frantz:

This letter responds to the North Slope Subsistence Regional Advisory Council's (Council) Fiscal Year 2024 Annual Report. The Federal Subsistence Board (Board) appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

1. 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in Unit 26B, the Council believes that the existing harvest limits set in the region may be based on incomplete or outdated data.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.

Response:

The Board agrees that it would be very beneficial for the Program and rural users to have funding for a Wildlife Resource Monitoring Program (WRMP); however, funding this monitoring program is unlikely in the near future due to cross-government efforts to reduce spending.

Staff from the Arctic National Wildlife Refuge (ANWR) shared information on muskoxen survey efforts in Unit 26B coupled with State and Federal biologists' observations that suggest that animals in this herd move between Unit 26B and Unit 26C. Data suggest that few (if any) individuals use Unit 26C exclusively. Therefore, all muskoxen in this range could have been counted in the State's survey effort in Unit 26B. ANWR staff will continue to work with ADF&G to understand changes in the muskoxen population that may inform future hunting opportunities. In partnership with ADF&G, ANWR staff have been exploring ways to extend their survey efforts from Unit 26B into Unit 26C with assistance from their new staff pilot. These discussions are ongoing, and ANWR is hopeful to expand the survey area in 2025 or 2026.

At your Winter 2025 meeting, you received a report from ADF&G during their Unit 26A update to your Council. They reported for Western Unit 26A Musk Ox:

- There were 421 muskoxen observed in Western Unit 26A.
- There were 70 bulls:100 cows and 61 yearlings:100 cows (2022).
- There will be a muskoxen survey in spring of 2025.

Also at your Winter 2025 meeting, your Council considered Wildlife Closure Review WCR26-25, which reviews the Federal lands closure in Unit 26C to muskoxen hunting, except by Kaktovik residents. In the biological background section of the analysis for this closure review, the following information was shared:

“Pre-calving muskoxen population estimates for the Unit 26B survey areas (which includes portions of eastern Unit 26A and western Unit 26C along the Canning River) were 373, 340, and 320 in 2022, 2023, and 2024, respectively (NSRAC 2023; Nelson 2024 pers. comm.). Muskox groups have routinely been observed on the Unit 26B/26C border during ADF&G tracking flights since 2014 (Lenart 2021, Nelson 2024, pers. comm.).”

State and Federal agencies will continue to provide valuable information when they have the resources to do so. Due to reduced available funding to agencies for such work, it is important to discuss prioritizing what information and data are needed to inform management decisions, what data collection efforts are a priority, and to see if there are other ways to collect information by local communities and others in areas with information gaps.

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.

Response:

There is value in the proposed research because it would be helpful to inform Federal and State managers on necessary regulatory changes for caribou in the region. However, at this time, neither the Board or OSM have available funding for a WRMP.

The Bureau of Land Management (BLM) managed lands (NPR-A) make up a large part of Unit 26 Federal public lands, and they have limited law enforcement staff in the NPR-A region. The National Park Service (NPS) has limited Federal public lands in the southern section of Unit 26 with a portion of Gates of the Arctic National Park, and they are knowledgeable about this issue from similar work in nearby regions. They shared research on the impacts of guided hunters, transporter companies, and non-federally qualified hunters on subsistence and caribou in the North Slope region but noted the research is dated and additional work is warranted.

Georgette and Loon (1988)¹ described this longstanding issue identifying that the most disruptive airplane behavior for Noatak hunters were low-flying aircraft, independent of hunting competition. Wolfe et al. (2000)² provided an overview of the effects of aircraft on caribou in the region (see p. 64). The only study we are aware of directly looking at sport hunt activity on caribou in Alaska is Fullman et al. (2017).³ They identified hotspots of potential conflicts among user groups and described the challenge of developing policies that balance human access with species conservation.

Many concerns regarding the effects of transported and guided hunters on subsistence and caribou have emerged from Anaktuvuk Pass since fly in hunters use the airstrip. Further, the State Controlled Use Area to the north of Anaktuvuk Pass does have some effect since it delays or prevents other fly in hunts during key times of subsistence caribou harvest.

We recommend that your Council continue to invite Federal and State agencies to discuss this topic at your meetings. Equally important is to invite the Arctic Slope Regional Corporation (ASRC) to discuss their observations from monitoring ASRC lands, and also the North Slope Borough to learn about how they are able to gather and share information with the Council and communities in the North Slope region so that all parties can work together to benefit subsistence users and address concerns such as those expressed in this report topic.

Other Annual Report Topics for Information Purposes Only

The Board thanks the Council for sharing information in your FY-2024 Annual Report on another issue significant to your region and subsistence users, (3) the Council's objective to create a North Slope Caribou Commission to promote conservation and management of caribou herds that support subsistence needs and encourage necessary research that address local concerns and traditional knowledge.

We appreciate and value the traditional knowledge, observations, and expertise you share. With this information, we are better prepared to make informed decisions.

In closing, we want to thank you and your Council for your continued involvement in the Federal Subsistence Management Program and the work you do on behalf of federally qualified subsistence users. We appreciate your efforts and are confident that federally qualified subsistence users of the North Slope Region are well represented through your work.

¹ Georgette S, Loon H. 1988. The Noatak River: Fall Caribou Hunting and Airplane Use. Technical Paper No. 162. Alaska Department of Fish and Game, Division of Subsistence, Kotzebue, AK, USA. Available at: <https://www.adfg.alaska.gov/techpap/tp162.pdf>.

² Wolfe et al. 2000. Response of reindeer and caribou to human activities

³ Fullman, T. J., K. Joly, and A. Ackerman. 2017. Effects of environmental features and sport hunting on caribou migration in northwestern Alaska. *Movement Ecology* 5 (4): 11 pp. DOI 10.1186/s40462-017-0095-z.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Christianson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Anthony Christianson
Chair

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