

North Slope Subsistence Regional Advisory Council

c/o Office of Subsistence Management

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In Reply Refer To:

OSM.B25056

January 13 2026

Anthony Christianson, Chair
Federal Subsistence Board
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson,

I write to you on behalf of the North Slope Subsistence Regional Advisory Council (Council) with our comments on the review of the Federal Subsistence Management Program (FSMP) undertaken by the Secretary of the Interior and the Secretary of Agriculture (Secretaries).

The Council spent much of its September 16 – 17, 2025, public meeting in Utqiagvik developing comments as requested with minimal notice and limited guidance. The Council would like the Federal Subsistence Board (Board) to convey our frustration with the Office of the Secretaries' poor execution of this request to comment, especially considering that this limited review is a public scoping process that should allow those likely to be impacted by the outcomes of this review ample opportunity to voice their thoughts on the matter. The Council, however, understands the immediacy of the requests and asks the Board to convey the following comments to the Department of the Interior Alaska Affairs Office for the Secretary's consideration.

1. Move of the Office of Subsistence Management (OSM) to the Office of the Assistant Secretary for Policy, Management, and Budget (OS-PMB)

The Council is neutral on OSM's move to the OS-PMB. The Council has not experienced any changes at our level since the move.

2. Criteria for Regional Advisory Council membership

The Council believes that certain improvements can be made to the recruitment and onboarding

process. Drawing on our collective experience, the Council has the following recommendations to the program:

3. Modifying the first question of the application/nomination form to read “describe your (or your nominee’s) knowledge of fish and wildlife resources in the region AND experience participating in subsistence activities.” *See enclosure.*
4. Shortening the nomination and appointment timeframe. Currently, the process takes between one and one and a half years before applicants are notified whether or not they have been appointed to the Council. In that time, applicants may have lost interest or forgotten that they have applied to serve on the Council, which can negatively impact recruitment success.
5. Making the appointment process more user-friendly.

The Council considers the following aspects of the nomination and appointment process adequate and encourages no changes to be made to the following:

6. The Council appreciates that applicants or nominees are required to provide references and considers this part of the process to be effective.
7. The Council also agreed that the term for each appointment is appropriate and considers that serving three years is adequate.

8. Membership of the Federal Subsistence Board

The Council believes the current composition of the Board is adequate and is pleased to see Tribally nominated public members serving on the Board. The Council believes that having a mix of Agency heads and public members is beneficial to the FSMP and further supports the addition of more public members. The Council enjoys attending Board meetings and understands the Board’s limitations on its authority and jurisdiction in a dual-management system.

9. Federal regulations and State regulations for duplication and inconsistency

The Council considers the guidance provided to us on this topic to be inadequate and unclear. The Council believes that to provide meaningful feedback on such a complex issue, more guidance and lead time are necessary. However, the Council discussed some of the challenges of dual management in the State of Alaska and has the following recommendations:

- The State should mirror federal harvest regulations. Because the State cannot give rural preference under the Alaska constitution, it is limited from meeting the needs of subsistence users and sometimes is in direct conflict with subsistence priority. For that reason, the Council advises the Secretaries against any efforts to align federal harvest regulations to mirror or follow the State’s.

- Dual management by design creates many user conflicts between subsistence users and sport hunters. Sport hunters are either unaware or disrespectful of traditional subsistence practices such as letting the lead caribou pass undisturbed to continue to lead the herd on their migration route. This has led to food insecurity to the community of Anaktuvuk Pass within our region where caribou are deflected from their traditional migration paths.
- The State is allowing and encouraging fly-in hunts on state, federal, and private lands, thus contributing to more user conflicts. The State is actively collecting money for providing these permits and has a monetary incentive to continue to do so.
- The lack of both State and Federal enforcement of harvest regulations exhausts local resources. In our region, the North Slope Borough performs many rescue operations for stranded fly-in sport hunters each season.
- More State and Federal law enforcement officers are needed in the field to enforce harvest regulations. Dual management is extremely complex, and both the Department of the Interior and the Alaska Department of Fish and Game (ADF&G) should ensure that harvest regulations on paper are followed on the ground; these regulations are meaningless if they are not enforced.
- Lastly, the Council would like to encourage collaboration with the State to conduct more education/orientation programs for sport hunters to ensure their compliance with regulations and to encourage their respect for local subsistence users and traditional practices.

10. Regulations governing special actions

The Council has no comment on this.

11. Role of the State and the Alaska Department of Fish and Game in the Federal Subsistence Management Program

The State's involvement in the FSMP is beneficial, but the dual management system is in place because the State cannot give preference to rural residents as ANILCA mandates. The Council has the following comments on the issue:

- The Council considers it beneficial to involve ADF&G in the Council process and to have a designated ADF&G staff member(s) to disseminate information and provide input. The Council appreciates receiving biological/technical information from ADF&G to inform decision-making.
- The Council supports maintaining the current role of ADF&G and is not supportive of augmenting its involvement in the FSMP. State regulations cannot guarantee a subsistence priority, which negatively impacts subsistence users in the state.

- State regulations are so onerous that they have been a source of conflict with the ADF&G personnel in our region. Our people are more likely to get a citation or go to jail for harvesting a caribou than for shooting a federally protected species, such as a polar bear.
- In the North Slope region, there is a lot of mistrust with the ADF&G because of our experience and history with the agency. The North Slope Borough, which conducts harvest surveys across the region, continues to hear about people's reluctance to participate in surveys out of fear that their information will be shared with ADF&G and used against them to change regulations.
- Many, if not most, communities in the North Slope region do not trust ADF&G and augmenting its role in the FSMP would increase mistrust in the Federal program as well.

12. Board procedures on non-rural determinations

The Council has no comment as everyone in the North Slope region is a rural resident.

13. Additional comments

The Council believes the following are other important comments not solicited in the targeted review for the Secretary to consider:

- The Secretaries should be more considerate of the Council's time and provide adequate notice and information on requests such as this program review by doing their due diligence.
- The FSMP is vital to subsistence users in our region. The Secretaries should understand that it was extremely difficult to provide substantive comments with very little information and very little notice. The Council felt like requesting feedback in such a manner was intentional, and we felt like many steps of the comment process were skipped.
- The Council urges the Secretaries to extend the comment period for this review to allow for more substantive comments and receive better informed input.
- The federal regulatory process takes too long. The process is effective, but users have to wait two years for a regulatory change to be implemented.
- Council members are required to travel to attend our meetings and get paid a travel per diem that is not proportional to the cost of living in rural Alaska. The FSMP should provide higher travel per diem due to dramatic increases in the cost of living in rural Alaska. For example, a gallon of milk is \$16 in the North Slope region.
- Council members need to be compensated for the valuable knowledge and the time they invest to ensure the FSMP is successful. As volunteers, we must request a leave of absence from our employers in order to attend our meetings. Between travel days,

weather delays, and meeting days, we rely on the per diem to get by, and it is not enough to cover expenses. Additionally, many people cannot afford to serve on the Council. Not providing an honorarium for Council members is also a barrier for recruitment as many people simply cannot afford to do it. The Councils sent a letter to the Secretary of the Interior several years ago (*see enclosure*) requesting Council members to be fairly compensated at the GS-12 level.

- The Council believes there is a need for increased collaboration and information sharing across regions and organizations. The FSMP would benefit from having more multi-Council meetings or interaction with other Federal or State entities with similar objectives, such as the National Park Service Subsistence Resource Commissions or State Fish and Game Advisory Committees.

The Council is thankful for the opportunity to comment on these topics and participate in the review. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Gisela Chapa at (907) 310-6129 or gisela_chapa@ios.doi.gov.

Sincerely,



Brower Frantz
Chair

Enclosures: DI-9009 Membership application/nomination form rev. 09-2024.
Joint Council letter to the Board regarding Council member compensation with four attachments.

cc: Federal Subsistence Board
Interagency Staff Committee
North Slope Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record