



Federal Subsistence Board

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



In Reply Refer To:
OSM.F26034

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 2025 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to consider these reports. The 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. Effects of guides, transporters, commercial operators, and fly-in hunters on caribou migration

"The Council continues to express urgent concerns about disruptions to caribou migration and the resulting impact on the people of Anaktuvuk Pass (AKP). These disruptions – primarily caused by aircraft activity and sport hunting practices – threaten food security for local communities that rely on caribou as a primary subsistence resource. In its FY2024 annual report, the Council highlighted the need for research funding to study the effects of transporter and guided hunting activity on caribou and subsistence practices. The Council continues to receive reports of low-flying aircraft and hunting camps along the valleys of Anaktuvuk Pass, Gunsight Mountain, and the area around Galbraith Lake. These recurring incidents underscore the inadequacy and limitations of regulations such as the existing AKP Controlled Use Area (CUA), which prohibits the use of aircraft for the harvest of caribou, among other species, during peak migration activity. The Council acknowledges that the AKP CUA is a state-managed CUA, but it is a prime example that regulations without presence or enforcement are ineffective in preventing such disturbances.

Request to the Board

To address these concerns, the Council respectfully requests the following actions:

- *Encourage Federal agencies to monitor and document caribou deflection to understand the broader implications of disturbance on migration and subsistence practices.*
- *Formally request collaboration with State Troopers and the Alaska Department of Fish and Game to monitor permitted activity from the Dalton Highway to AKP and surrounding valleys and improve enforcement in the CUA. Additionally, request collaboration of state and federal enforcement officers to monitor the area west of AKP to Point Hope for fly-in hunters.*
- *Prioritize enforcement and request federal agencies to establish law enforcement presence in the affected area during peak migration, from August through November.*
- *Continue the dialogue on this issue with the Federal Subsistence Board and Interagency Staff Committee members.”*

Response:

The Board acknowledges the Council’s continued and urgent concerns regarding the effects of aircraft activity, guided and transported hunters, and commercial operators on caribou migration near Anaktuvuk Pass. We recognize that this is not the first time your Council has raised this issue, and that both the Northwest Arctic and Eastern Interior Regional Advisory Councils have brought forward similar concerns in recent years. The Board understands the seriousness of these disruptions and the resulting impacts on food security for the people of Anaktuvuk Pass and surrounding communities.

The Board also recognizes that the AKP Controlled Use Area (CUA) was designed to reduce conflict between subsistence users and aircraft. However, as the Council notes, the CUA has limitations. According to the Alaska Department of Fish and Game, the area is closed to the use of aircraft for hunting caribou—including transporting hunters, gear, or caribou parts—from August 15 through October 15. However, this restriction does not apply to transportation between publicly owned airports. As a result, transporters may legally land at public strips such as Galbraith Lake or Anaktuvuk Pass, allowing hunters to walk just outside airport boundaries and position themselves along migration corridors. The Board agrees that regulations without presence or enforcement are often ineffective in preventing disturbance.

While the Board does not have management authority to implement all aspects of the caribou management strategies recommended by the Council, we will strive to advance the portions that fall within our jurisdiction. Federal agencies coordinate and collaborate among themselves and with the State to conduct enforcement activities as much as possible. However, Federal agencies currently do not have the staff or funding to adequately monitor caribou deflection on the North Slope. Past monitoring efforts were summarized in your FY2024 annual report, and we appreciate the Council’s continued documentation of local observations. Given limited enforcement resources, coordination with villages and individual subsistence hunters remains both encouraged and appreciated.

Chair Frantz

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The Board also suggests that your Council continue working with neighboring Councils that share these concerns. In June 2026, the Eastern Interior Council submitted a detailed letter (Enclosure 1) to the Bureau of Land Management, National Park Service, and U.S. Fish and Wildlife Service proposing several measures to mitigate these issues. If your Council agrees with those recommendations, you may wish to consider submitting a similar letter to the Federal managers for the areas of concern in your region.

Additionally, the Board recommends that the Council write directly to the Alaska State Troopers and the Alaska Department of Fish and Game to express enforcement concerns and request increased collaboration. State agencies have primary authority over many of the activities occurring in and around the AKP CUA, and direct communication may help strengthen coordinated enforcement efforts.

The Board encourages the Council Chair to continue this dialogue during the Board's summer work session. We also recommend that your Council continue inviting Federal and State agencies, including law enforcement personnel, to your meetings to discuss this issue. Equally important is engaging with the Arctic Slope Regional Corporation (ASRC) and the North Slope Borough, both of which may have valuable information from monitoring their lands and working with local communities. Their participation could help ensure that all parties are working together to support subsistence users and address the concerns raised in this report.

The NPS has produced an extensive number of papers and reports investigating factors that influence caribou migrations. For the Council's reference these reports are listed in Enclosure 2.

The Board is committed to working with your Council, partner agencies, and local communities to better understand and address the impacts of aircraft activity and hunting practices on caribou migration and subsistence access.

We recognize that you are uniquely positioned to offer first alerts to changing conditions and important trends that impact subsistence in your region. The Board appreciates and values the traditional knowledge, observations, and expertise you share. We make informed decisions thanks to the knowledge that you provide.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts. Federally qualified subsistence users of the North Slope Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

Chair Frantz

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Enclosures:

1. Topic 1 Encl 1 – EIRAC letter to Fed agencies re air taxi issues (6/12/2026)
2. Topic 1 Encl 2 – Factors Influencing Caribou Migration References List

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

Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game

Administrative Record

Eastern Interior Alaska Subsistence Regional Advisory Council

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In Reply Refer To:

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JUN 12 2026

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Enclosure 1

Merben Cebrian, Refuge Manager
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101 12th Avenue, Room 236
Fairbanks, AK 99701

Dear Eastern Interior Federal Land Managers,

I write on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to raise concerns about air taxis that transport hunters and to request increased oversight of their operations on Federal public lands in the region.

The Council met in Fairbanks on March 3-5, 2026. During the meeting, Council members and members of the public raised the following concerns:

1. Wanton waste and poor meat care – when hunters are dropped off and left in the field too long, it can lead to spoiled meat. Nonresident hunters often prioritize antlers over meat, which can lead to waste. When enforcement does not know where hunters are being dropped off, they cannot monitor camps for this issue.
2. Public safety – air taxis sometimes cannot retrieve hunters in a timely manner, leading to situations where local search and rescue must intervene, incurring significant costs. At other times, nonresidents may not be prepared for field conditions and variable and harsh weather in Alaska, which can lead to rescue situations.
3. Trespass and illegal operations – the Council regularly receives reports of trespassing on Native corporation lands and Native allotments, yet there is a lack of penalties and insufficient means to enforce trespass. Additionally, the Council has received reports of aircraft covering their tail numbers to avoid being reported, which is extremely concerning and illegal.
4. Accountability and enforcement – law enforcement is stretched thin and often receives reports after the hunting season, making it difficult to investigate wanton waste or illegal activity. Air taxi reporting is not required to be submitted in a timely manner.

The Council strongly urges Federal land management agencies in the Eastern Interior Region to adopt or pursue the following actions:

A. Require Timely In-season Reporting (Not End of Year)

Federal managers and law enforcement must receive actionable information when hunters are *in the field*, not months later when evidence is gone. As a condition of special use permits or commercial use authorizations, the Council recommends that agencies require:

- Transporters submit real-time GPS coordinates to Federal enforcement at both drop-off and pickup.
- Operator name, aircraft tail number, client list, hunt area, and pick-up schedule submitted *before* entry onto Federal lands.
- Prompt notification if schedules change due to weather or mechanical issues.

Enclosure 1

- 24-hour reporting requirements for transporters for any client left past their planned pickup date, any emergency extraction, any instance of unreturned communication with a client, and any known or suspected violation committed by a transporter's client.

B. Strengthen Permit Conditions and Enforcement Authority

- Outline clear consequences for operators who abandon clients, obscure aircraft numbers, exceed permit conditions, or who are repeatedly associated with wanton waste or other illegal activities.
- Ensure the ability for Federal managers to suspend, revoke, or deny permits for repeated violations.
- Enhance collaboration between State and Federal law enforcement and VSPOs, where appropriate.
- Confiscate the aircraft of transporters who cover tail numbers and report to FAA.

C. Evaluate Transporter Liability for Search and Rescue (SAR)

Search and Rescue costs should not fall on local communities or rural volunteer groups. We ask Federal agencies to explore whether transporters can be held financially liable for negligence leading to SAR deployment and whether SAR cost-recovery provisions can be tied to Federal permitting.

D. Improve Outreach and Education

We request joint agency coordination for:

- Hunter ethics education emphasizing meat-first harvest practices as required by law.
- Information for non-resident hunters on respecting Native allotments and private lands.
- Brief mandatory pre-hunt orientations for transported clients.
- Opportunities for donating meat and other useable animal parts

E. Establish a Taskforce to Address Trespassing

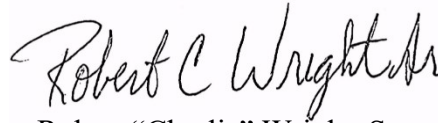
Bring together land managers and law enforcement to work with local communities, Doyon, and Tanana Chiefs Conference to find ways to more effectively address this on-going issue. Provide training on the required documentation and reporting needed to effectively convict trespass.

Additionally, the Council asks that U. S. Fish and Wildlife Service, National Park Service, and Bureau of Land Management managers collaborate on a presentation for our fall 2026 Council meeting to provide an overview and comparison of how guide and air taxi operations are permitted and monitored across the Federal lands in our region. We would like this to include a summary of the number of guides and transporters permitted per area, numbers of guided and transported hunters annually, and the number of animals harvested by guided and transported hunters annually. Please also coordinate with law enforcement to identify any existing limitations or authorities relevant to the Council's recommendations above. We also plan to contact the Big Game Commercial Services Board to learn more about how they regulate guides and transporters on State lands.

We look forward to your response and to working together to protect the subsistence way of life while ensuring safe and lawful use of Federal lands. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Enclosure 1

Sincerely,

A handwritten signature in black ink, reading "Robert C. Wright, Sr." in a cursive script.

Robert "Charlie" Wright, Sr.
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Eastern Interior Alaska Subsistence Regional Advisory Council
Western Interior Alaska Subsistence Regional Advisory Council
North Slope Subsistence Regional Advisory Council
Karlin Itchoak, USFWS Assistant Regional Director for National Wildlife Refuges
Kent Slaughter, BLM Acting Fairbanks District Manager
Office of Subsistence Management
Administrative Record

Enclosure 1

Factors Influencing Caribou Migration

Many factors have the potential to affect caribou migration including temperature, precipitation, herd size, snow conditions, range condition, the individual caribou's condition, and human activity. The National Park Service (NPS) has produced an extensive number of papers and reports investigating factors that influence caribou migrations. These reports are listed below and are publicly available, copies can be requested from the NPS.

List of References

- Joly, K., and M.D. Cameron. 2026. Caribou Vital Sign Annual Report for the Arctic Network Inventory and Monitoring Program: September 2024–August 2025. Science Report NPS/SR—2026/385. National Park Service, Fort Collins, Colorado.
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Enclosure 2