



Federal Subsistence Board

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



In Reply Refer To:
OSM.F26032

Thomas Baker, Chair
Northwest Arctic Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Baker:

This letter responds to the Northwest Arctic 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. Addressing Ongoing Declines of Caribou Populations

"The Council continues to have grave and immense concerns about the ongoing decline of caribou populations, including the Western Arctic Caribou Herd (WACH). In the past, the Council noted recurring issues of non-resident and non-local hunters impacting WACH migrations and populations, especially on State lands, and the Council previously submitted Federal and State proposals to address these issues. The Board has taken actions on Federal lands based on Council recommendations and input from other groups, such as the WACH Working Group, to help slow declines, reduce displacement, and allow for subsistence opportunities. The Council appreciates these efforts; however, with the most recent WACH population estimate at 121,000—well below the State of Alaska's minimum population objective of 200,000—it is imperative to do much more to support the survival of the herd.

Recommendation:

The Council strongly urges the Board to take further action, including strengthening enforcement of current harvest limits, implementing additional harvest restrictions, and working collaboratively with the State to implement similar strategies on State-managed lands. Unenforced harvest limits undermine previous conservation efforts and create a cycle of ineffective management. To protect all subsistence resources, there must be parity in closures

and regulations across both Federal and State managed lands. There must also be adequate enforcement of limits and additional restrictions implemented to support population recovery. The Council continues to highlight this critical concern in the annual report to emphasize the need for immediate, comprehensive, and coordinated action.”

Response:

The Board has no authority regarding enforcement of harvest regulations. However, federal agency members of the Board recognize the Council’s concerns for enforcement in its region. Despite continuously shrinking funding, federal agencies are working to increase, improve, and streamline their law enforcement efforts. The National Park Service just hired a new law enforcement officer for Gates of the Arctic National Park and Preserve, freeing up other Northern hub staff to patrol other park units. Bureau of Land Management law enforcement continues to monitor a large portion of the state with limited staff and is looking for new opportunities to work collaboratively with its partners. The U.S. Fish and Wildlife Service has only four Fish and Wildlife Officer’s (FWO) and a Patrol Captain assigned to the Northern half of Alaska and they cover as much territory as possible. One new FWO is scheduled to arrive in September, but two others are planning to retire. We encourage anyone that you talk with to report issues to FWOs in a timely manner and to gather as much information as they can on the violators, including photographs (number of people, dates/times, boats and aircraft used and registration numbers, locations, etc.) without putting yourself or others in danger. This information will greatly help FWOs address the issues.

As visitation, recreational use, and resource protection demands continue to increase, agencies are challenged to accomplish more with fewer resources. These changes increase pressure on existing programs as agencies continue working to meet resource protection, public safety, emergency response, and law enforcement responsibilities with limited personnel and funding. Nevertheless, agencies stay committed to protecting wildlife resources, supporting lawful and ethical hunting practices, safeguarding subsistence opportunities, and ensuring the life, safety, and health of visitors, employees, and local communities.

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 (enclosed) 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.

In June 2026, the Board acted on three Wildlife Special Action requests regarding conservation of the WACH, WSA26-01, -02, and -03. Wildlife Special Action Request WSA26-01 asked to reduce the caribou harvest limit in Units 22, 23, and 26A west of the Colville River drainage upstream from the Nuka River and drainages of the Chukchi Sea, south and west of and including the Kuk and Kugrua river drainages (Unit 26A SW) to 4 caribou per year, only one of which may be a cow for the 2026/27 regulatory year. Wildlife Special Action Requests WSA26-

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02 and WSA26-03 asked to close Federal public lands to caribou hunting by non-federally qualified users for the 2026-2028 wildlife regulatory cycle in Units 22 and 26A SW, respectively.

The Board adopted WSA26-01 with a modification to eliminate the cow caribou hunt through the 2027/28 regulatory year and to defer action on reducing the bull caribou harvest limit until the Board's fisheries regulatory meeting on February 1 – 5, 2027. The Board stated that eliminating cow caribou harvest would have the greatest impact on WACH conservation and recovery, and this change was supported by both the Seward Peninsula and Northwest Arctic Councils. The Board noted that the Alaska Department of Fish and Game recently issued an emergency order closing the cow caribou hunt under State regulations, and this modification would maintain regulatory alignment, supporting a unified conservation approach and clear public messaging.

The Board deferred action on the harvest limit reduction because bull to cow ratios indicate bulls may still be harvested without impacting conservation. In addition, the Alaska Board of Game will consider similar proposals at its January 23-27, 2027, meeting in Kotzebue, and the Board determined it was appropriate to revisit the issue after that discussion.

The Board also adopted WSA26-02 and WSA26-03, stating both closures are necessary for the conservation and continued subsistence uses of the WACH as well as to maintain a subsistence priority as required by law and in deference to the Councils.

2. Support Additional Research Funding and Studies to Fill Data Gaps

“The Council remains concerned about the availability of subsistence resources and adequate subsistence opportunities due to the changing climate and other factors. Warmer weather, storms, flooding, and other events are changing seasonal patterns, landscapes, and broader ecological conditions. This creates challenges for both subsistence users and the resources they rely on. In addition to caribou, communities have observed declines in moose, sheep, salmon, and other species. These declines have increasingly led locals to rely more heavily on other species, such as sheefish and muskox.

Recommendation:

The Council emphasizes the need for scientific studies and surveys to better understand current populations trends, especially in the context of climate-related changes and other factors. Considering population declines, the Council underscores the critical need for additional scientific monitoring, research, and proactive measures to better inform proposals and decision-making. The Council requests the Board to fund studies through the Fisheries Resource Monitoring Program where possible and to encourage staff to seek other opportunities and collaborations to support further research.”

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Response:

The Board wholeheartedly agrees with the Council about the need for continued and additional scientific research to better inform management and public understanding of resources that are so vital to rural Alaskans. This is doubly important considering ongoing shifts in the aquatic and terrestrial environments and the associated impacts on fish and wildlife. Although federal, State, Tribal, and academic partners are contributing valuable research that improves our understanding of changing fish and wildlife populations, current efforts remain insufficient for addressing the breadth and urgency of the declines being observed and substantially expanded monitoring and research will be essential to support effective subsistence management.

The Board fully supports the 2026 Fisheries Resource Monitoring Plan that was approved by the Director of the Office of Subsistence Management (OSM). Given significant decreases in Monitoring Program funding (compared to previous cycles) and increased competition for those funds, OSM and the U.S. Forest Service developed a strategy to support at least one project in each of the Fisheries Resource Monitoring Program's (FRMP) six regions.

The Board also acknowledges the longstanding need for a Wildlife Resource Monitoring Program (WRMP). We believe that a WRMP would provide essential information to address many of the biological data gaps affecting subsistence wildlife resources across Alaska. Unlike the Fisheries Resource Monitoring Program established decades ago, a comparable program for wildlife has unfortunately yet to be developed.

Section 812 of Title VIII of the Alaska National Interest Lands Conservation Act, codified at 16 U.S.C. § 3122, says that the Secretary shall, among other things, undertake research on fish and wildlife and subsistence uses on the public lands. This statutory mandate underscores the importance of a structured and responsive research program, and of the creation of a WRMP could assist the Federal Subsistence Management Program in meeting this obligation for terrestrial resources.

The framework provided by the existing Fisheries Resource Monitoring Program offers a strong foundation from which a WRMP could be developed with only modest modifications to support terrestrial research. However, the lack of dedicated funding and staffing remains the primary impediment. As the Council noted, the need is clear; what is missing is the financial capacity to implement the program. Current shrinking budgets across the Departments of the Interior and Agriculture present significant challenges to initiating new programmatic commitments, including a WRMP.

While the Board does not have authority over the development of the annual appropriations for the Office of Subsistence Management, the Council can convey its concerns to the Secretaries of the Interior and Agriculture through a formal letter transmitted via the Board. The Board also encourages coordination with other Regional Advisory Councils that have expressed similar concerns, as a joint Council approach may further emphasize the statewide importance of this issue.

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The Board remains committed to supporting the Council's priorities to the fullest extent of its authority and research and information necessary to maintain meaningful subsistence opportunities for rural Alaska residents.

3. Highly Support the Increase of Hunting and Trapping Opportunities on Wolves and Bears

"The Council is extremely concerned about increased sightings of predators near communities, which pose threats to both human safety as well as to important subsistence resources. In the Northwest Arctic, wolves have been observed in proximity to several villages, seemingly targeting dogs for food, an indicator that they are not finding adequate food further afield. Safety concerns were raised when wolves were spotted shortly after schools dismissed for the day in at least one village, when children were traveling home. Bears have not yet been observed coming into the villages, but due to recent poor salmon runs they may also begin looking to replace these calories with different food sources and appear to be more frequently targeting larger mammals.

Hungry wolves and bears are putting significant pressure on already depressed moose and sheep populations and may be a significant factor contributing to the continuation of caribou population declines.

Recommendation:

To address these concerns for safety and pressure on subsistence resources, communities have begun to encourage predator harvests and village monitoring. The Council submitted previous proposals on this topic and would appreciate additional Federal assistance to further these efforts, including funding predator studies and other surveys to inform future proposals (see item #2). The Council would like to see expanded opportunities for hunting and trapping of wolves and bears, such as longer seasons, larger bag limits, fewer restrictions, and possibly unlimited harvests. Increased take of these predators would support food security in the region where the availability of other traditional subsistence resources has declined. Subsistence users would also be able to utilize other parts of the wolves and bears, which could allow for additional economic opportunities as well."

Response:

The Board encourages the Council to submit proposals to liberalize federal bear and wolf regulations during the next call for Federal wildlife proposals at your winter 2027 meeting, remaining cognizant of the Board's predator control policy. The Board is also aware of the proposals the Council submitted to the Alaska Board of Game, which is scheduled to meet in January 2027.

Information on wolf and bear studies by the National Park Service follows:

National Park Service Wildlife Biologist Dr. Raime Fronstin initiated a study in 2020 to learn more about wolf demographics in Noatak National Preserve (NOAT). Methods have included flying spring wolf den surveys to map an active den site, placing a game camera at a focal den, and collecting wolf scat samples for genetic and dietary analyses. Beginning in 2027, the study will expand to multiple active den sites in the preserve.

Objectives include:

1. Obtain a baseline estimate for wolf abundance in Noatak National Preserve by genotyping scat samples using single-nucleotide polymorphisms to determine a minimum count and approximate individual wolf packs.
2. Gain insight into the activities, den habitat characteristics, distance between active dens, den timing, litter sizes, diet, and survival of arctic wolves, using corroborative evidence from genotyping of scat samples, spatial mapping of dens, remote den cameras that will monitor the den site during pup rearing, and den visits by researchers.
3. Comprise a collection of samples that will be further analyzed using fecal metabarcoding to analyze diet composition and make spatial and inter-pack comparisons.

The brown bear in the Western Arctic National Parklands (WEAR) is monitored with a sight-resight methodology via aerial sampling that enables spatially explicit inference on bear population size. Brown bear in the lower NOAT during a 2016 survey were found to exhibit some of the highest bear densities of any area monitored in the arctic region by the Arctic Inventory and Monitoring Network (ARCN), with an estimated population size of 81.3 bear/1000 km² (Schmidt et al. 2023). The population size in the upper NOAT is estimated to be substantially less than the lower NOAT (34.0 bear/1000 km²), although the estimated population size in the upper NOAT is still very similar to other areas that ARCN monitors (e.g., Seward Peninsula, Gates of the Arctic National Park; Schmidt et al. 2023).

ARCN attempted a bear survey in 2024 in the lower NOAT. However, due to several factors, we are unable to conclusively determine the population size of brown bears in the lower NOAT with any degree of confidence. The reasoning behind this included:

1. **Incomplete survey.** Survey conditions were suboptimal and we were unable to complete the survey as designed. We were only able to complete ~72% of the planned survey effort, leaving us with limited data to reliably estimate abundance. While we could technically generate an estimate, the reduced effort increases the potential for spurious results due to random chance.
2. **Spring onset.** Several bears were detected at or near dens during the survey, suggesting that all bears may not have been out of their dens during the survey period. This included a bear detected on the very last day (sow ran into den upon being spooked by the aircraft). Bears remaining at or near dens could have been influenced by the bad weather we experienced (same weather that prevented us from flying multiple days). Of course, if bears are in dens and not available to be detected, this would induce negative bias on subsequent population estimates.

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Unfortunately, without a more complete survey, we cannot make more definitive statements about the size or trajectory of brown bears in the lower NOAT area. It will require more information (i.e., another high-quality survey) to estimate the size of this bear population.

The Council can reference the following study for more information:

Schmidt, J.H., Deacy, W.W., Hughes, L.J. and Schertz, D.T., 2023. Non-invasive mark-resight surveys for brown bears: Incorporating spatial information to improve landscape-scale monitoring of density and distribution. *Ecological Solutions and Evidence*, 4(4), p.e12288.

The Board wants to thank the Council for sharing information in your FY-2025 Annual Report on another issue significant to the Council. The Board acknowledges the Council's concerns regarding contamination from current mining activities and potential impacts from future development projects in your region and requests that the OSM Council Coordinator seek and invite contamination researchers to your meetings to share available information.

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 Northwest Arctic Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

Enclosure:

1. Topic 1 Encl 1 – EIRAC letter to Fed agencies re air taxi issues (6/12/2026)

cc: Northwest Arctic 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:

R26064

JUN 12 2026

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Eastern Interior Federal Land Managers

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Merben Cebrian, Refuge Manager
 Arctic National Wildlife Refuge
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 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.

- 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.

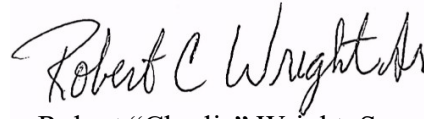
Additionally, the Council asks that U. S. Fish and Wildlife Service, National Park Service, and Bureau of Land Management managers collaborate on a presentation for our fall 2026 Council meeting to provide an overview and comparison of how guide and air taxi operations are permitted and monitored across 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.

Eastern Interior Federal Land Managers

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Sincerely,

A handwritten signature in black ink that reads "Robert C Wright Sr". The signature is written in a cursive, flowing style.

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

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