



Federal Subsistence Board

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



In Reply Refer To:
F26034

AUG 12 2026

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.

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

Enclosures:

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