

North Slope Subsistence Regional Advisory Council
c/o Office of Subsistence Management
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Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chairman Christianson,

The North Slope Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2021 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held via teleconference on November 1-2, 2021, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 8-9, 2022, meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the North Slope Region.

1. Request for monitoring of Unit 26C muskox and transboundary management with Canada

The Council is very concerned about the continuously low muskox population in Unit 26C. There has not been any subsistence harvest opportunity for muskox in the region for many years. This muskox population range extends across the border between Canada and the eastern side of the Arctic National Wildlife Refuge in the U.S., and muskox move back and forth between the two countries. The Council has heard reports that high rates of muskox harvest occur in Canada and is concerned that overharvest in Canada may be keeping the overall population low. The Council requests information on cross-boundary management of muskox within Arctic National Wildlife Refuge and Canada and would like to explore options for the creation of a joint U.S.-Canada muskox management group similar to the Porcupine Caribou Herd Management Board.

2. Ongoing concerns about contaminants in subsistence fish within NPR-A

The Council remains very concerned about contaminants in subsistence fish within Federal lands of National Petroleum Reserve – Alaska (NPR-A). This is an issue of real distress for the community of Nuiqsut, whose residents continue to find sick and dying fish. Residents now have anxiety about eating fish that have traditionally been essential to their diet and wellbeing. For many years, the Council tried to find a way to monitor contaminants in subsistence fish through the Fisheries Resource Monitoring Program. The Council has been informed that this needs to be done by the land management agencies. Thus, the Council requests that the Bureau of Land Management (BLM) fund this necessary contaminants research. BLM is responsible for the permitting of the past and present industrial activities within NPR-A that are the source of these contaminants. The Council seeks the support of the Federal Subsistence Management Program to ensure that these essential subsistence fisheries resources are protected and that communities get answers about contaminants so that they can safely continue to eat healthy traditional subsistence foods.

3. Recognition and support for community harvest and sharing patterns

The Council wishes to highlight the importance of traditional community harvest and sharing of subsistence foods. Subsistence communities need to take care of each other and continue to have access to healthy subsistence foods especially during the ongoing hardship of the pandemic. The Council encourages the Federal Subsistence Management Program to recognize and support these traditional sharing practices and ensure easy access to designated hunter permits and community harvest programs.

4. Request for Federal Subsistence Board to further consider continuation of subsistence uses and that substantial evidence include local and traditional knowledge when taking action on proposals

“Supported by substantial evidence” is one of the top criteria the Board considers in its decision making on regulatory proposals and special action requests. The Council has observed that the expertise of local and traditional knowledge is often not considered along with western science when identifying “substantial evidence.” Rural and indigenous communities have direct experience and observations that span life lived on the land throughout the year and throughout a knowledge handed down across generations. Traditional knowledge and the observations and experiences of subsistence resource users are as substantial as western science. The Council requests that the Board better incorporate local and traditional knowledge in its decision making.

The Council also requests the Board give greater consideration for “continuation of subsistence uses” in its decision making as well. Subsistence priority cannot be achieved without access to subsistence resources. Actions from non-subsistence resource users may deflect animals away from rural communities, change migration patterns and timing, and have other effects that prevent subsistence resource users from accessing fish or wildlife populations.

The North Slope Subsistence Regional Advisory Council appreciates the Board’s attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues

and concerns of subsistence users in the North Slope Region. If you have any questions regarding this report, please contact me via Eva Patton, Council Coordination Division, Office of Subsistence Management, at eva_patton@fws.gov, or 1-800-478-1456 or 1-907-786-3358.

Sincerely,

Gordon Brower
Chair

cc: Federal Subsistence Board
North Slope Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record