

WP26-62a Executive Summary	
General Description	WP26-62a requests that the Board recognize the customary and traditional use of muskoxen in Unit 22A by residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet. <i>Submitted by: the Seward Peninsula Subsistence Regional Advisory Council</i>
Proposed Regulation	<p><i>Customary and Traditional Use Determination—Muskox</i></p> <p>Unit 22A</p> <p style="text-align: right;">All rural residents <i>Residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet</i></p>
OSM Conclusion	Support Proposal WP26-62a with modification to clarify the regulatory language.
Seward Peninsula Subsistence Regional Advisory Council Recommendation	Support as modified by OSM.
Interagency Staff Committee Comments	The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit some or all of the eight factors. The Board does not use such determinations for resource management or restricting harvest. The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.
ADF&G Comments	Neutral
Written Public Comments	None

Customary and Traditional Use Analysis WP26-62a

ISSUE

Wildlife Proposal WP-62a, submitted by the Seward Peninsula Subsistence Regional Advisory Council (Council), requests that the Federal Subsistence Board (Board) recognize the customary and traditional use of muskoxen in Unit 22A by residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet.

Proponent Statement

The Council states that Unit 22A is the traditional use area of the communities of Saint Michael, Shaktoolik, Stebbins, and Unalakleet. Now that muskoxen have moved into the area, residents would like to have the opportunity to harvest them.

Introduction

The Board has not previously made a customary and traditional use determination for muskoxen in Unit 22A. If a proposal is received requesting a customary and traditional use determination where none has been made for the resource, as in the case of Unit 22A muskoxen, the analyst evaluates use by all rural residents who may harvest the resource within the geographic boundaries defined by the proponent in the request.

In order to determine which rural residents may harvest muskoxen in Unit 22A, this section begins by assessing harvest records. A State hunt for muskoxen in Unit 22A was first implemented in 2021. The hunt is administered as a Tier II hunt (TX090), which weighs factors such as the number of years an applicant has hunted or utilized the resource in the hunt area, as well as the cost of food and fuel in the applicant's community of residence. **Table 1** shows that only people from Shaktoolik, Saint Michael, and Unalakleet have participated in the State Unit 22A muskox hunt since it was first opened.

Because of the short time-depth of the State muskox hunt in Unit 22A, and the way in which Tier II permits are distributed, there may be additional rural communities that would have participated, if given the opportunity. However, lacking this information, the analysis will focus on communities with a record of hunting for muskoxen in the subunit. In addition, Stebbins, which is named in the proposal, will also be analyzed. Like Saint Michael, Stebbins is located to the south of the current southern edge of the Unit 22A muskox population. Stebbins and Saint Michael are interrelated communities located eight miles apart. Given that Saint Michael has participated in the Unit 22A muskox hunt, it is logical to also include Stebbins in the analysis.

Companion proposal WP26-62b requests that the Board establish a muskox hunt in Unit 22A, with a harvest limit of one bull and a season of August 1 to March 15.

Table 1. The number of State TX090 muskox hunters and harvests in Unit 22A between regulatory years 2021 and 2024 by the hunter’s community of residence (Carson 2025, pers. comm.).

Community of Residence	Number of muskox hunters	Number of muskox harvests
Shaktoolik	1	1
Saint Michael	2	0
Unalakleet	27	26
Total	30	27

Current Federal Regulations

Customary and Traditional Use Determination—Muskox

Unit 22A

All rural residents

Proposed Federal Regulations

Customary and Traditional Use Determination—Muskox

Unit 22A

All rural residents Residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet

Extent of Federal Public Lands

Unit 22A is comprised of approximately 69% Federal public lands that consist of 57% Bureau of Land Management (BLM) and 12% U.S. Fish and Wildlife Service (USFWS) managed lands.

Regulatory History

Please also see analysis of Proposal WP26-64 for additional regulatory history of Seward Peninsula muskoxen.

In 1970, 36 muskoxen were transplanted to the southern portion of the Seward Peninsula; a supplemental transplant of 31 animals occurred in 1981 (Machida 1997). Until 1995, there was no Federal or State muskox hunt in Unit 22. The Board made initial Federal customary and traditional use determinations for muskoxen for all subunits except Unit 22A in 1995 (P95-43) based on traditional use territories. No determination was made for Unit 22A because muskoxen did not occur in the subunit at that time. As a result, all rural residents would be eligible if a Federal season is established in Unit 22A. The Board has not received any subsequent proposals to make a customary and traditional use determination for muskoxen in Unit 22A. A State hunt for muskoxen in Unit 22A was first established in regulatory year 2021-2022.

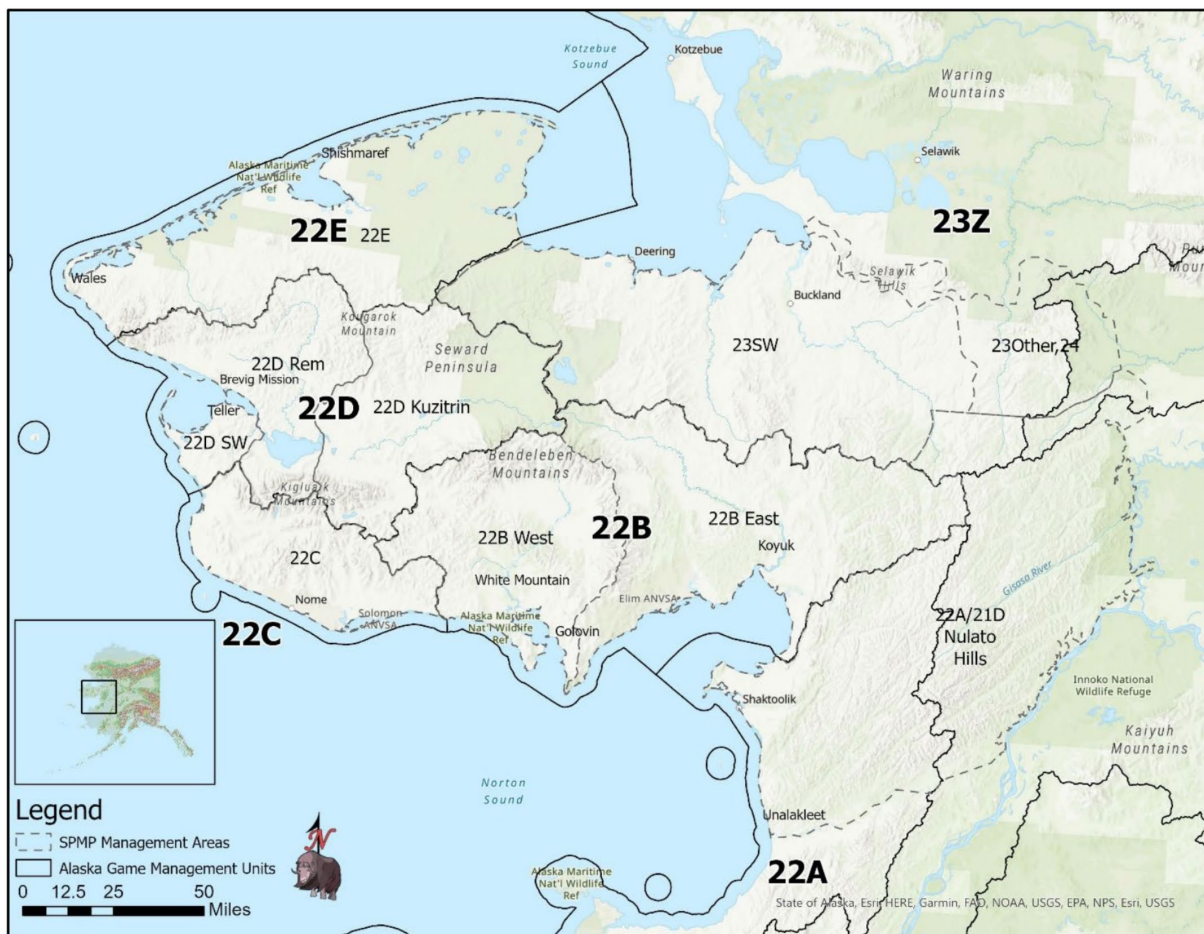


Figure 1. Seward Peninsula muskox population management areas, Unit 22 (Dunker and Germain 2022).

Background

Currently, Seward Peninsula muskoxen are distributed throughout Unit 22 north of the Unalakleet River, in the southwestern portion of Unit 23, and the westernmost portions of Units 24D and 21D (Dunker and Germain 2022, **Figure 1**). 2010 was the first year that ADF&G included Unit 22A in surveys of the Seward Peninsula muskox population, in response to expansion of the population into the subunit (Gorn 2011).

There are Federal muskox hunts in Units 22B-E and Unit 23, but residents of Unit 22A do not have a customary and traditional use determination for muskoxen in those areas, and have never had their use of muskoxen analyzed in any area. Residents of Shaktoolik, Unalakleet, Stebbins, and Saint Michael are already federally qualified to hunt other ungulates in the region. All residents of Unit 22, including these communities, have a customary and traditional use determination for moose and caribou in Unit 22. Additionally, all residents of Unit 22 are federally qualified to hunt caribou in Unit 23.

Community Characteristics

The Iñupiaq, Siberian Yupik, and Central Yup'ik people of the Seward Peninsula have a deeply rooted practice of subsistence hunting, fishing, and gathering of wild resources (Raymond-Yakobian and Zdor 2020). Until European contact in the early 19th century, many of these groups were semi-nomadic, moving with the seasons based on the availability of wild resources. During the winter months, people often lived in permanent villages along the coast where they harvested seals, belugas, other marine mammals, fish, and small land mammals. During warmer months, they established family fish camps near rivers and lakes to harvest fish and plant resources (Ray 1984).

Shaktoolik, the northernmost community in Unit 22A, is a predominantly Iñupiaq settlement located on the eastern shore of Norton Sound, 125 miles east of Nome and 33 miles north of Unalakleet (DCRA 2024). Shaktoolik has been relocated several times due to erosion and other natural factors (Ray 1983, DCRA 2024). In 2023, the community had an estimated population of 207 (ADLWD 2023).

The village of Unalakleet is located at the mouth of the Unalakleet River in eastern Norton Sound, approximately 148 miles southeast of Nome (DCRA 2024). Unalakleet is a subregional hub community (Ahmasuk and Trigg 2007). The Kaltag Portage, an important traditional trade route, ran from Kaltag along the Unalakleet river, ending at Unalakleet (Pratt 2012). Since the mid-nineteenth century the Unalakleet River has marked a rough linguistic boundary between speakers of Iñupiaq to the north and Central Yup'ik speakers to the south (Woodbury 1984). In 2023, Unalakleet had an estimated population of 685 (ADLWD 2023).

Both Stebbins and Saint Michael are Central Yup'ik communities (DCRA 2024). Stebbins is located on the northwest coast of St. Michael Island, 120 miles southeast of Nome, and it is connected by road to Saint Michael, eight miles away (Magdanz et al. 2007, Braem et al. 2017). The Yup'ik name for the village is *Tapraq*; the name Stebbins first appeared in 1900 (Ray 1983, DCRA 2024). Stebbins is culturally connected to communities in the Yukon Delta, and many residents trace their ancestry to Nelson Island (Wolfe 1981). Since soon after their introduction, reindeer have been part of Stebbin's economy (Braem et al. 2017). In 2023, Stebbins had an estimated population of 631 (ADLWD 2023).

Saint Michael is also located on the southern shore of Norton Sound, on the opposite side of Saint Michael Island from Stebbins (DCRA 2024). The Yup'ik name for Saint Michael is *Taciq* (DCRA 2024). A Russian American Company trading post was built at Saint Michael in 1833, and many residents have Russian ancestry (DCRA 2024). In 2023, Saint Michael had an estimated population of 435 (ADLWD 2023). Neither Saint Michael nor Stebbins has easy access to caribou. The winter range of the herd has moved further away from the communities over time. Subsistence harvest of moose and caribou has historically been supplemented by use of reindeer, but freezing rain conditions now often result in widespread scattering of the herds (Braem et al. 2017).

Eight Factors for Determining Customary and Traditional Use

A community or area's customary and traditional use is generally exemplified through these eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit some or all of the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process, and present recommendations for regulatory changes. In June 2016, the Board clarified that the eight-factor analysis applied when considering customary and traditional use determinations is intended to protect subsistence use, rather than limit it. The Board stated that the goal of the customary and traditional use determination analysis process is to recognize customary and traditional uses in the most inclusive manner possible.

In Iñupiaq, muskoxen are called *umingmak*, "the one with hair like a beard" (Lent 1999). Paleontological evidence indicates that muskoxen occupied most of the unglaciated interior, western, and all of northern Alaska during the Pleistocene (Lent 1998). The earliest archaeological evidence for use of muskoxen in Arctic Alaska dates to Birnirk culture, beginning in approximately 600 A.D. (Lent 1998, 1999). Birnirk people used ladles and spoons made of muskox horn, and have been found buried in muskox robes (Lent 1999).

Muskoxen were likely always present at relatively low numbers, and their use was limited but continuous over approximately 1500 years (Lent 1998). Historically, muskoxen provided fat when

caribou were lean in late winter and early spring and provided an alternative food source in years when caribou were scarce. In comparison to caribou, the availability of muskoxen was more predictable in time and space (Klein 1989).

Muskoxen were more heavily hunted following the introduction of firearms, and were also intensively harvested by whalers, trappers, and traders in the 1800s. According to ethnohistoric research, the last muskoxen in Northwestern Alaska were hunted in the late 1850s around Wainwright, but the exact timing of their local extirpation further south in the Northwest Arctic and Seward Peninsula regions is unknown (Lent 1999). Due to their extirpation, residents of the Seward Peninsula were unable to hunt muskoxen for an extended period of time. The exact duration of this interruption of use is unknown, but it was long enough to prevent inter-generational transmission of hunting practices and knowledge about muskoxen, representing a significant disruption in their long-term pattern of use. Muskoxen were first reintroduced to the region in 1970 (Machida 1997, Lent 1999).

Historically, people in the Seward Peninsula area hunted a variety of species opportunistically, adapting to the changing availability of different species. Large ungulates were not readily available on the Seward Peninsula in the second half of the 19th century (Tape et al. 2016). Caribou were hunted traditionally, but their numbers declined in the mid-1800s (Dau 2000). Reindeer were introduced from Siberia in 1892 under a Federal program initiated by Sheldon Jackson to provide more meat for the Iñupiat in the area (Dau 2000). The reindeer industry was an important source of food in the region until the 1990s, when caribou moved back into the area. Reindeer dispersed with migrating caribou, and the reindeer industry declined (Finstad et al. 2007). However, reindeer continue to be important to some Unit 22 communities (Kawerak 2025).

Today, residents of Unit 22A harvest a wide diversity of resources: caribou, moose, bear, seals, walrus, birds, furbearers, small game, and fish. Of the four communities, only Stebbins has been surveyed comprehensively by ADF&G, Division of Subsistence (Braem et al. 2017) (other surveys have focused only on certain species, such as large land mammals). In Stebbins in 2013, all surveyed households used wild resources, and 92% of surveyed households harvested wild resources (ADF&G 2025). Salmon, herring, and seal were some of the most important resources in terms of pounds of edible weight harvested (ADF&G 2025).

Large land mammals contributed only about 7% of Stebbin's total wild food harvest in 2013. However, Stebbin's harvest of large land mammals should be considered in the context of the local reindeer herding industry. In 2013, there were about 4,000 reindeer in the area, jointly managed by a local herder, Stebbins Tribal Council, and Saint Michael Tribal Council (Braem et al. 2017). Although reindeer contribute significantly to the diet of Stebbins residents, it is considered a domesticated species, and is not included in subsistence surveys, with the exception of a small amount of feral reindeer (Braem et al. 2017).

There are many examples of species being introduced, reintroduced, or moving into new areas, and subsequently being adopted into the local subsistence round, so long as opportunity is provided. Moose began moving into the Seward Peninsula in the 1940s following major fires in the region, and harvest

of this species grew as their population increased (Thomas 1982; SPRAC 2019a, 2019b; Braem et al. 2017; Tape et al. 2016). In another example, residents of Kaktovik began to hunt muskoxen after their reintroduction, and have had their customary and traditional use recognized by both the State (Pedersen et al. 1991) and the Federal subsistence program. Muskoxen were first reintroduced to the Seward Peninsula in 1970 (Machida 1997). Over time, residents of Unit 22 have incorporated muskoxen into their seasonal round. The State muskox hunts in Unit 22D and 22E opened in 1998, and the State hunts in Unit 22C and 22B opened in 2001; this means that in 1995 when the Board made its customary and traditional use determinations for these areas, it did so without any established harvest record for muskoxen in Unit 22 (OSM 1995).

Analysis previously conducted by OSM pertaining to customary and traditional use determinations for muskoxen in the other subunits of Unit 22 (P95-43) included the following background on local attitudes towards muskoxen: “Local people have been waiting for the [muskox] population to grow large enough to sustain a hunt. There is great interest in hunting muskox[en]...People in the Seward Peninsula region have cared for the muskox[en] since their transplantation, with the understanding that they would be able to hunt them someday” (OSM 1995: 294).

In the same analysis, OSM noted that, “it could be expected that, when offered the opportunity, Seward Peninsula residents would...incorporate muskox into their annual round of subsistence activities. Given the intent of Title VIII of ANILCA is to provide for 1) continuity of the subsistence way of life; 2) the continuing use of wildlife resources; and 3) utilization of locally available resources, then residents...should be determined to have customary and traditional use of muskox...”(OSM 1995: 292).

Since the opening of Federal muskox hunts in 1995 and State muskox hunts in 1998 and 2001 in other portions of Unit 22, those residents of Unit 22 who are eligible and have access to muskox hunts have incorporated the species back into their seasonal round, to the extent that hunts are available. Prior to 2021, some residents of Unit 22A communities already hunted muskoxen under State opportunities (Carson 2025, pers. comm.), although doing so involved applying for and being selected to participate in a competitive Tier II hunt in another subunit of Unit 22. Having established a pattern of muskox hunting in other portions of Unit 22 despite permitting and travel obstacles, it is natural to conclude that residents of Unit 22A would likely harvest muskoxen closer to home if a hunt is established in their own subunit, in keeping with their wider practice of hunting other available species near, or reasonably accessible from, the community or area.

In Unit 22A, muskoxen are likely to continue to be reincorporated into ongoing customary and traditional subsistence practices because other large ungulates are not always readily available. For example, after conducting households surveys and interviewing key respondents in Stebbins for the 2013 study year, Braem et al. noted that participants “expressed concerns about access to large land mammal populations. Residents explained that caribou have been scarce in the region in the last few decades, and that hunters must travel long distances in pursuit of this resource” (2017).

There is no information available about the timing of muskox harvest by residents of Unit 22A prior to their reintroduction to Unit 22 and subsequent establishment of regulatory seasons. Residents of Unit 22A are currently only able to participate in State muskox hunts. In Unit 22A, since the establishment of a State hunt in 2021, the season has been from August 1 to March 15. In other, longer-established State hunts within Unit 22, the seasons run from August 1 or January 1 to March 15.

Customary and traditional hunting practices are usually characterized by taking place near, or reasonably accessible from, a community. Because there are no available subsistence surveys or contemporary ethnographic studies that include details about Unit 22A residents' muskox hunting practices, information on the locations of these communities' harvest of moose is included here instead. Although muskox hunting areas may reflect different habitat use areas, moose harvest locations can establish a pattern of harvest in proximity to a community. Harvest reports from the few years during which a State muskox hunt has existed in Unit 22A provide additional information on harvest locations later in the analysis.

A subsistence study of Shaktoolik showed that the community's usual moose hunting area included the Shaktoolik River, and especially the area upstream from "Punuk," a traditional placename (Thomas 1982). This area is close and accessible to the community. Subsistence surveys conducted by ADF&G, Division of Subsistence from 2002 to 2003 showed that Unalakleet households harvested 97% of their moose in Unit 22A, and most of this harvest occurred around the Unalakleet River (Georgette et al. 2004). Similarly, over the same period, Stebbins households harvested 90% of their moose in Unit 22A (Georgette et al. 2004). A subsequent subsistence study of Stebbins conducted for the 2013 study year showed both moose and caribou harvest occurring close to the community, as well as slightly further away in an area around the communities of Emmonak and Alakanuk, which, like Stebbins, are Central Yupik villages (Braem et al. 2017). Subsistence survey data on the geography of Saint Michael's moose hunting is not available, although it is likely to be similar to Stebbin's pattern of localized hunting.

Customary and traditional subsistence practices are also characterized by a means of handling and storing wild foods which has been passed down by previous generations. Again, because of lack of information pertaining to muskoxen in Unit 22A, information on how Shaktoolik residents process moose is included here. In his 1982 subsistence study, Thomas reported that Shaktoolik residents dried, smoked, and froze moose meat. One participant described learning from his father how to bleed and tenderize the meat before skinning and gutting (Thomas 1982). Muskox meat tends to be preferred fresh in other areas where it has been incorporated into the local subsistence diet, such as Kaktovik, where muskox meat is considered highly desirable (Pedersen et al. 1991, OSM 1995).

Harvests of unusual, significant, or large animals, such as muskoxen, are often widely shared. In smaller communities, when a young hunter makes a first kill, the meat is typically distributed to every house in the community. The subsistence survey of Stebbins for the 2013 study year found that "all key respondents noted the overwhelming importance of sharing in Stebbins to take care of those in need, particularly elders" (Braem et al. 2017). In the same community in 2013, 70% of surveyed households reported using land mammals, but only 21% of households reported successfully

harvesting them. The difference between the two measures can be attributed to widespread sharing, customary trade, and barter between residents (Braem et al. 2017).

Shaktoolik, Unalakleet, and Stebbins have each been surveyed once by ADF&G Division of Subsistence for their subsistence use of muskoxen. Although Saint Michael has been surveyed by Division of Subsistence, the survey did not include muskoxen. However, Saint Michael households were surveyed for their subsistence use of muskoxen once by Kawerak (Ahmasuk and Trigg 2007). Harvest of muskoxen was not documented for any of the Unit 22A communities during their study years. However, lack of documented muskox harvest in the subsistence surveys should be considered within the regulatory context (**Table 2**) and alongside officially reported harvest (see the section on Reported Harvest Under State Opportunity).

Table 2 shows that in Unit 22 (excluding Unit 22A, where no hunt existed until 2021), State opportunity to hunt muskoxen has varied over the years. The table shows how hunts were administered by the State each regulatory year, which would have affected whether and how the four communities in Unit 22A could have applied to participate in the hunts. For example, Tier II hunts tend to favor those residents living in the subunit where the hunt occurs. Although the four communities have reported muskox harvest in other subunits of Unit 22 during certain years, as shown later in the analysis (Carson 2025, pers. comm.), this harvest would not necessarily be documented in subsistence surveys. Relatively few muskoxen permits are available; because only a sample of community households are surveyed, it is possible that muskoxen could have been harvested by a household or households not included in the survey.

Shaktoolik

Shaktoolik was surveyed by ADF&G, Division of Subsistence for the period May 2009 to April 2010 (Braem 2012, ADF&G 2025). The Division surveyed 92% of households in Shaktoolik. That year, there were no State muskox hunting opportunities available in Unit 22A. State hunts in the remainder of Unit 22 were offered through a combination of drawing and registration permits (**Table 2**). Surveyed Shaktoolik households did not attempt to harvest, use, or share muskoxen in 2009—2010 (Braem 2012, ADF&G 2025). Other subsistence surveys that have been conducted by Division of Subsistence for Shaktoolik did not ask participants about muskoxen.

Unalakleet

Unalakleet was surveyed by ADF&G, Division of Subsistence for the 2004—2005 study year (ADF&G 2025). Division of Subsistence surveyed 93% of Unalakleet households. That year, there were no State muskox hunting opportunities available in Unit 22A. Hunts in the rest of Unit 22 were offered as Tier II hunts, except in Unit 22E, where there was also a drawing opportunity (**Table 2**). Surveyed Unalakleet households did not harvest or attempt to harvest muskoxen in 2004—2005 (ADF&G 2025). However, approximately 4% of surveyed households received and used muskox, and less than one percent gave away muskox (ADF&G 2025). Other subsistence surveys that have been conducted by Division of Subsistence for Unalakleet did not ask participants about muskoxen.

Stebbins

Stebbins was surveyed by ADF&G, Division of Subsistence for the period January 1 to December 31, 2013 (Braem et al. 2017, ADF&G 2025). Division of Subsistence surveyed 64% of Stebbins households. In 2013, about 13% of surveyed Stebbins households harvested large land mammals. There was no State muskox hunting opportunity in Unit 22A that year. Opportunity in the rest of Unit 22 was offered as Tier II hunts, except in Unit 22E, where there was also a registration hunt (**Table 2**). Surveyed Stebbins households did not attempt to harvest, use, or share muskoxen in 2013 (Braem et al. 2017, ADF&G 2025). Other subsistence surveys that have been conducted by Division of Subsistence for Stebbins did not ask participants about muskoxen.

Saint Michael

ADF&G, Division of Subsistence has never surveyed Saint Michael for its use of muskoxen (ADF&G 2025). However, Kawerak conducted subsistence surveys for the community for the July 2005 to June 2006 study year, sampling 59% of Saint Michael households (Ahmasuk and Trigg 2007, ADF&G 2025). There was no State muskox hunting opportunity in Unit 22A that year. Opportunity in the rest of Unit 22 was offered as Tier II hunts, except in Unit 22E, where there was also a drawing hunt (**Table 2**). Kawerak found no documented hunting or use of muskoxen by surveyed households in Saint Michael that year (Ahmasuk and Trigg 2007, ADF&G 2025).

Table 2. Administration of State muskox hunts in Unit 22 during years in which one of the Unit 22A communities was surveyed for subsistence use of muskoxen.

Regulatory Year	Unit 22B	Unit 22C	Unit 22D	Unit 22E
2004—2005	Tier II	Tier II	Tier II	Tier II and Drawing
2005—2006	Tier II	Tier II	Tier II	Tier II and Drawing
2009—2010	Registration	Registration and Drawing	Registration and Drawing	Registration and Drawing
2012—2013	Tier II	Tier II	Tier II	Registration
2013—2014	Tier II	Tier II	Tier II	Registration

Harvest Under State Opportunity

Reported harvest under State hunts provides some information about muskox hunting effort and harvest patterns by residents of Stebbins, Saint Michael, Shaktoolik, and Unalakleet. Between 2000 and 2024, Stebbins residents participated in a total of four muskox hunts in Unit 22, including three successful hunts in Unit 22E, and one unsuccessful hunt in Unit 22D (Carson 2025, pers. comm.). During this same time, Saint Michael residents participated in two unsuccessful muskox hunts, which took place in Unit 22A following the opening of the State hunt in the subunit in 2021. Between 2000

and 2024, Shaktoolik reported four successful muskox hunts, one in Unit 22D, two in Unit 22B, and one in Unit 22A. Between 2000 and 2024, residents of Unalakleet hunted for muskoxen in all subunits of Unit 22 except Unit 22E (Carson 2025, pers. comm., **Table 3**). Although the State Unit 22A hunt only opened in 2021, most of Unalakleet’s total muskox harvest came from this subunit (Carson 2025, pers. comm., **Table 3**).

Table 3. Reported muskox harvest by residents of Unalakleet in Unit 22, 2000—2024. Years with no attempted harvest were not included (Carson 2025, pers. comm.).

Year	22A Hunt	22A Harvest	22B Hunt	22B Harvest	22C Hunt	22C Harvest	22D Hunt	22D Harvest
2002					1	1		
2003			1					
2004					2	1	1	1
2005			1	1			2	2
2006			1	1	1	1	3	2
2007			1	1			2	2
2008							1	
2009							2	2
2010							2	2
2012							1	
2013							1	1
2015					1	1		
2016					1	1		
2017					1	1		
2018					1	1		
2019					1	1		
2020					2	2		
2021	4	4			2	1		
2022	7	7			1	1		
2023	8	7						
2024	8	8						
Total	27	26	4	3	14	12	15	12

Alternatives Considered

One alternative considered was to clarify the regulatory language to be ‘Residents of Unit 22A’ instead of naming individual communities. This aligns with the C&T determinations for muskox in the rest of Unit 22, and the general Board policy of C&T’s being as inclusive as possible by including anyone that may live outside of the community boundaries within Unit 22A.

Discussion and Effects

If this proposal is adopted, residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet will have their customary and traditional use of muskoxen recognized in Unit 22A. They will become federally qualified to participate in muskox hunts under Federal subsistence regulations on Federal public lands. If this proposal is rejected, residents of the four communities can continue to harvest muskoxen in Unit 22 under State regulations.

OSM CONCLUSION

Support Proposal WP26-62a **with modification** to clarify the regulatory language.

The draft regulations read:

Customary and Traditional Use Determination—Muskox

Unit 22A

~~*All rural residents*~~ ***Residents of Unit 22A***

Justification

Muskoxen were present in the Seward Peninsula until their extirpation in the 19th century. They were first reintroduced to the region in 1970. State hunts were initially established in portions of Unit 22 other than Unit 22A in 1998 and 2001. Subsistence surveys conducted for a single year for each community between 2005 and 2013 have not captured muskox hunting by any of the Unit 22A communities. However, residents of Shaktoolik, Unalakleet, Stebbins, and Saint Michael have reported hunting and harvesting muskoxen in other portions of Unit 22 under State regulations, despite limited availability of permits. Muskox hunting opportunity first became available within Unit 22A as a Tier II State hunt in 2021. Every Unit 22A community except Stebbins has reported hunting muskoxen in Unit 22A since 2021.

Unit 22A communities have already had their customary and traditional uses of moose and caribou recognized in Unit 22. There are many previous examples of species being introduced, reintroduced, or moving into new areas in Alaska, and subsequently being adopted into the local subsistence round. Unit 22A communities are likely to continue to reincorporate muskoxen into their local subsistence practice as hunting opportunity becomes available, and because other ungulates, such as caribou, are less abundant. Because of lack of ethnographic information about the communities' use of muskoxen, the analysis provides information about their use of moose, another recent arrival in the region that has been incorporated into subsistence hunting. The reestablishment of muskoxen on the Seward Peninsula and the North Slope provide examples where the Board has previously recognized local communities' customary and traditional use of this species despite historical interruptions, reflecting the deeper history of the species in the region, as well as the adaptability of subsistence practice.

The modification clarifies and simplifies the regulatory language.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Seward Peninsula Subsistence Regional Advisory Council

Support proposal **WP26-62a as modified by OSM**. The Council stated that there are multiple uses for muskoxen in the region, including use of qiviut and arts and crafts. The meat is valued in the region. If a hunt is established, this will provide a new opportunity for federally qualified subsistence users.

INTERAGENCY STAFF COMMITTEE COMMENT

The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit some or all of the eight factors. The Board does not use such determinations for resource management or restricting harvest. The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

Wildlife Proposal WP26-62a

This proposal would recognize the customary and traditional (C&T) use of muskoxen in Game Management Unit (GMU) 22A by residents of Saint Michael, Shaktoolik, Stebbins, and Unalakleet and establish muskox hunting on federal public land by residents in those communities.

Position

The Alaska Department of Fish & Game (ADF&G) is **NEUTRAL** on this proposal. Regarding the eligibility requirements for participation in the subsistence program provided under the Alaska National Interest Lands Conservation Act (ANILCA), ADF&G urges the Federal Subsistence Board (FSB) thoroughly and carefully review the data relevant to the 8 criteria for communities that lack a customary and traditional use finding.

Background

The Board of Game (BOG) adopted a proposal in 2020 allowing muskox hunting in GMU 22A. This new hunting opportunity arose in response to increased numbers of muskoxen in the area as the Seward Peninsula muskox population expanded their range eastward into Unit 22A.

The state Tier II system exists to prioritize subsistence users when limited hunting opportunity exists for a game species. Since hunting was allowed for muskoxen in GMU 22A beginning in Regulatory Year 2021, only residents of 22A have been awarded Tier II permits for muskoxen under the 22A hunt (TX090).

Impact on Federally Qualified Users

If adopted, residents of those communities within GMU 22A would be able to hunt muskoxen on federal public land in addition to state land. However, other FQUs would then be prohibited from hunting under federal regulations for muskoxen in GMU 22A. The passage of this proposal could also cause confusion for residents of those communities as they would now need to be cognizant of which permit they need depending on the land status they are hunting.

Impact on Other Users

If adopted, other users would not be impacted by these proposals as they are already prohibited from hunting for muskox on federal public land.

Opportunity Provided by State

State customary and traditional use findings: The BOG has made positive customary and traditional use findings for muskoxen in GMU 22.

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the BOG to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for muskoxen in GMU 22 is 100-150 animals. The season and bag limit for 22A muskoxen is:

<u>Unit/Area</u>	<u>Bag Limit</u>	<u>Open Season (Permit/Hunt #)</u>	
		<u>Resident^a</u>	<u>Nonresident</u>
22A	<i>One Bull</i>	<i>Aug 1 – Mar 15 (TX090)</i>	<i>No open season</i>

^a Subsistence and General Hunts.

Conservation Issues

If adopted, there are no conservation issues associated with the passage of these proposals.

Enforcement Issues

If adopted, there could be enforcement issues as two different permits are needed depending on if you are on state or federal public land.