

*Disclaimer: These minutes of the Subsistence Resource Commission for Wrangell-St. Elias National Park are NOT an official transcript of the Commission proceedings. Rather, the minutes serve as a summary of the topics discussed and actions taken by the Commission and as an index to the audio recording of the meeting. The official record of the Commission proceedings is the audio recording.*

## MINUTES

### WRANGELL-ST. ELIAS SUBSISTENCE RESOURCE COMMISSION

October 4 and 5, 2024

Wrangell-St. Elias National Park and Preserve Visitor Center  
Copper Center, Alaska, and by teleconference

- 1) **Call to order:** Sue Entsminger, the SRC chair, called the meeting to order at 9:03 a.m.
- 2) **SRC roll call and confirmation of quorum:** Present were Sue Entsminger, Dan Stevens, Suzanne McCarthy, Mercedes Starr Knighten, Nathan Brown, Bruce Ervin, and Kaleb Rowland. A quorum of members was present.
- 3) **Introduction of Commission members, staff, and guests:**  
SRC members: Sue Entsminger, Suzanne McCarthy, Dan Stevens, Mercedes Starr Knighten, Nathan Brown, Bruce Ervin, and Kaleb Rowland. Absent: Daryl James, Clint Marshall, and Edward GreyBear.

NPS staff:

AKRO: Sarah Creachbaum, Scott Gende, Kim Jochum, and Sahara Iverson

WRST: Ben Bobowski, Joshua Scott, Benjamin Pister, Dave Sarafin, Kyle Cutting, Mark Miller, Barbara Cellarius, Amber Cohen, Jan Maslen, Rebekah Levine, Kyle Meakins, Kelly Glascott, and Chelsea Hernandez

Other state or federal agency staff: Mark Sommerville (ADF&G-Glennallen), Tracy Hansen (ADF&G- Glennallen), Tessa Wittman (BLM-Glennallen), Caroline Ketron (BLM-Glennallen), Tim Sundlov (BLM-Glennallen), Alysia Hancock (BLM-Glennallen), and Shawn Bayless (Tetlin National Wildlife Refuge)

Tribal government or tribal organization representatives: Karen Linnell (AITRC), Jim Simon (AITRC), Deanna Kosbruk (AITRC), David Hooper (AITRC), Kathryn Martin (Ahtna, Incorporated), and Sarah Sherwood (CRNA)

Other organizations: Amanda Jackson (Copper River Watershed Project)

Members of the public: Bruce Gordon (Chitina), Matt Warnick (Tolsona), Kirk Wilson (Tolsona), Carlos Perez Vargas (Tolsona), Estrella Vargas (Tolsona), Brit Peek (Tolsona), Victoria Rego (Nabesna Road), Michasel Rego (Nabesna Road), and Faye Ewan (Copper Center)

- 4) **Housekeeping announcements:** Barbara Cellarius gave the purpose of the meeting and detailed instructions for participating in the teleconference and in-person meeting. She explained the process for public comments. She reminded the Commission members about Robert’s Rules of Order. Alaska Geographic provided the funds for coffee and refreshments.
- 5) **Review and adoption of agenda:** Kaleb Rowland made a motion to adopt the agenda. Mercedes Knighten seconded the motion. The agenda was adopted by unanimous consent.
- 6) **Review and approval of minutes from March 14-15, 2024 meeting:** Nathan Brown made a motion to adopt the minutes as written, which was seconded by Kaleb Rowland. The minutes were approved by unanimous consent.
- 7) **Superintendent's welcome and review of the Commission purpose:** Superintendent Ben Bobowski gave a welcome to the Commission members, park staff, regional office staff, and members of the public. He reviewed the Commission purpose and thanked the Commission for their time.

8) **Commission membership status:**

<u>Member Name:</u>	<u>Community:</u>	<u>Appointing Source:</u>	<u>Term Expires:</u>
Bruce Ervin	Tok/Northway	Secretary of Interior	1/17/2027
Clint Marshall	Tazlina	Secretary of Interior	6/28/2026
Dan Stevens	Chitina	Secretary of Interior	3/28/2026
Edward GreyBear	Copper Center	Secretary of Interior	9/27/2026
Kaleb Rowland	McCarthy	Governor	12/01/2026
Suzanne McCarthy	Gakona	Governor	12/01/2024
Nathan Brown	Slana	Governor	12/01/2024
Mercedes Starr Knighten	Glennallen	Southcentral RAC	11/04/2026
Daryl James	Yakutat	Southeast RAC	10/27/2025
Sue Entsminger	Mentasta Pass	Eastern Interior RAC	11/04/2024

Barbara explained that Nathan Brown’s term is listed incorrectly in the meeting book. It expires in December 2024 as he is finishing the term of a previous Governor’s appointee.

9) **SRC Chair and Members’ reports**

a) **SRC member reports:**

**Kaleb Rowland** reported about a hurt moose and wondered what residents could do to harvest an injured animal. Sue Entsminger replied that they had to talk to the Alaska Department of Fish and Game. Superintendent Ben Bobowski reaffirmed that in that situation to call Fish and Game or a park ranger, and the situation would be worked out.

**Dan Stevens** reported that few people harvested a moose in Chitina. Moose were scarce in the area. He did not get a moose and usually he gets one every year. There was not a very good salmon run either, because the river was high.

**Nathan Brown** said in Slana, there were low moose numbers, high predator activity of wolves and bears, and a moderate salmon run.

**Mercedes Knighten** heard from others in her community that the salmon runs were not as great as expected and harvest was not high. Residents had to share more in order to spread the harvest. People wanted to make fish wheels to use them, but it was difficult to get wheels in the Copper River. There were some successful moose hunters, but no one in her family or extended family harvested a moose even though they hunted every day of the hunt. She had not seen a cow moose since April last year and only saw one bull before and after hunting season. She said they are all hunting for the same moose. After the previous meeting, she received an occupational endorsement for Ahtna language certification and is working on Ahtna culture revitalization. She called into the public hearing for the WP25-01 proposal and encouraged more people to call into those hearings. She said it affected all of us to not hunt caribou. She was happy to learn about educational permits that could be used to harvest caribou. She had been teaching about hides and what to make out of them. If a moose was harvested in the spring, the moose hide could be used to make clothing and other items, while a fall moose had a thicker skin. She also was continuing medicinal plant use, presented to a college course at the University of Alaska, Anchorage, and taught an Ahtna culture and history class at Glennallen High School. She was doing her best to get information out to the public.

**Suzanne McCarthy** concurred with the others who had presented so far. She was not sure if people in her community got enough salmon. The harvest was different than in the past – not as plentiful and took longer to get enough fish. The moose went through a few devastating winters, and there are now few and far between. Travelling to and in places where people traditionally go has been challenging due to high water. There has been more ground water and a change in moisture. There had been significant changes in vegetation, even berry picking, as traditional places to pick are not there. The berries moved due to sun and water levels. It was a time of change.

**Bruce Ervin** heard that a handful of people harvested moose in his area. The weather had been unpredictable and switched between cold and warm. He called it a rollercoaster. There were still leaves on the trees in the areas he went to, and he noticed they dropped later. He noticed more rabbits on the road than he had seen last year and thought they might be making a comeback. Porcupine moved around later this year, and he saw more than usual on the road from Tok to Northway. He did not want to bother them as he had hardly seen porcupine on the road before. He went up to the Taylor Highway to call moose and heard wolves. He had not heard if people harvested moose in Unit 12. There was a potlatch recently in Northway, but the moose came from a different area. The Nabesna and Chisana rivers were low, and the river by the village had changed from the main channel. He saw a lot of birds including cranes and owls.

Mercedes Knighten added that berries had been hard to find and that she heard bear activity had increased in Glennallen and Chitina. She also heard coyotes when she called for moose. She would like to know more about predator control.

- b) **Chair's Report:** SRC Chair Sue Entsminger reported that she sat in on a caribou working group meeting and learned that the Nelchina caribou population numbers were up to 12,000 at the latest count. She wondered why there was such a big difference from the previous count, which was 7,000. She said Fish and Game needed to be more

accurate. She reported that the summer had been wet, and while it did not bring up the river levels, it did affect the blueberries. During the moose season, people did not see any movement until late in the season. There were two light frosts but not a hard killing frost until the middle of September. A few moose had been harvested. She received a moose tongue from a young woman in Mentasta who got her first moose, and as per tradition, gave most of it away. She did a lot of glassing and saw a few more lambs in the sheep population. During bear season, she had a wolf come into her yard. As a registered guide, she had taken several huge boars over bait and believed that helps the area. She received a report that people are seeing more golden eagles and those take lambs, which is a concern. She did not get any salmon and heard the run was not as big as in the past.

**10) Superintendent's report:** Superintendent Ben Bobowski said that he appreciated hearing the Commission members' reports. He presented recognition plaques to former members of the Subsistence Resource Commission. There were staffing changes and erosion to the park budget, but subsistence remained a priority. He highlighted the Resource Stewardship Strategy and Copper River salmon management issues. He was concerned that if management practices of salmon stocks did not change, then there could be a crisis on the Copper River at the level of the Yukon and Kuskokwim. The proposal developed for the Board of Fisheries focused on modifying the harvest timing of the commercial fishery in order to relieve pressures on the early salmon run. The proposal addressed the struggle subsistence harvesters have had in the upper Copper River.

**11) Public Comments:** Barbara Cellarius introduced the public comment period, which occurred both mornings of the meeting.

#### **October 4:**

Bruce Gordon of Chitina, and formerly Kenny Lake and Glennallen, had heard about the elder sheep hunt in the park. He prepared for the hunt, but when he came to the park to get a permit, he was told he could not hunt on that permit in Unit 12. He had done a lot of hunting in Unit 12, as had his kids and his late hunting partner Larry Hand. He and Larry both raised kids and married Alaska Native women and shared meat with those communities. He started hunting in 1970, when caribou were on a draw permit. He walked all over Units 11, 12, and 13. He wanted to go to Unit 12 because there was a place he could catch sheep—he took a 40-inch sheep out of there. When he came to the park, he saw a sheet which indicated which community could hunt where, and he was not allowed to get an elder sheep permit for Unit 12. He said by not allowing these communities, they are killing subsistence, and chopping off young people from subsistence.

Sue Entsminger said he should put in a proposal to the Federal Subsistence Board for a customary and traditional use determination for Chitina for sheep in Unit 12.

Kaleb Rowland commended him for coming to the microphone and said if he put in a proposal, it will force the Federal Subsistence Board to look at his case. The Commission would receive the proposal to review and likely would support it based on his testimony.

Dan Stevens said Bruce could talk with him.

Brit Peek of Tolsona said she had lived in the community for five years and had not seen a single caribou in the last two years. She also had not seen much moose at all. She would like to see a restriction on hunters from outside the area. She had seen tremendous amount of change in the Copper River. She was grateful her family had the opportunity to be on the Tazlina wheel and got enough fish for their family. There were many that had not. She had seen a wolf in her area and wondered how to control them. She asked the Commission to consider the proposals for Tolsona to support those in Tolsona who live there all year long.

### **October 5:**

Michael Rego of Nabesna Road brought up the ORV management plan and the lack of enforcement by the National Park Service. He saw, due to a lack of caribou hunting, an increase in moose hunting traffic. The Kendesnii Campground was full, and every pull out was full. He saw overweight side-by-sides on the trails for subsistence users. Few local subsistence users harvested a moose. He went out after the season to call them and had not seen any moose. He said it was due to more pressure by state users coming into the preserve. The Park Service also used a Can-Am 6x6 for trail maintenance and administrative use. He was also concerned about trapping on Park Service maintained trails. His neighbor's dog and his own dog were both caught in traps less than a mile from their cabins. He also had an issue with a wolf left in a trap for the season. He wanted to ask for a complete shut down on maintained trails that are heavily used by non-trappers, like the first couple miles of Trail Creek. He said some people were trapping on Nabesna Road, because they did not recognize it as a residential area. He also asked about how to reasonably move house logs out under the recommendations of the Subsistence Resource Commission working group. He said he would like to see a change in methods and means by using something larger over frozen ground cover to harvest wood for house logs. Finally, he had concerns about the sheep numbers in the preserve in Unit 12 and said the non-subsistence hunt was when they had the biggest influx of people into the Nabesna area. He recommended a draw hunt or a limited registration hunt to allow the sheep population to grow.

Sue Entsminger advised him to put a proposal into the state and to take up with staff about federal regulations.

### **Action Items:**

#### **12) Old Business Action Items**

##### **a) Proposed Superintendent's Compendium entry revising the Subsistence Log Harvest Policy**

- i) **Introduction:** Barbara Cellarius introduced the compendium, which the park typically releases in mid-January for a 30-day public comment period. The comments inform the proposed changes for the upcoming year. The compendium entry the working group tackled was a revision to the park subsistence log harvest policy, which dated back to 1989. Kaleb Rowland had raised the issue of authorizing the use of small bridges for subsistence access, which involved timber harvest. The working group's purpose was to do research and develop recommendations on the topic. Working group members were Kaleb Rowland, Suzanne McCarthy, Dan Stevens, Sue Entsminger, and now retired SRC member Gloria Stickwan. The group met three times and developed recommendations.

The log harvest policy had been updated to reflect regulation changes allowing the harvest of green and dead standing timber for subsistence uses other than firewood. These harvests require a permit per the regulations. The draft policy added a section authorizing the issuance of a permit for log harvests for use in constructing a shared-use subsistence cabin on NPS land, and shared use is required by regulation for a newly constructed subsistence cabin. There were other stipulations updated for the permits.

ii) **Report from working group:** Kaleb Rowland gave the report of the working group, which made the following recommendations:

- **Permit Requirements:**
  - Dead or Downed Timber: No permit is required for subsistence harvest of dead or downed trees.
  - Standing Live Timber: Subsistence uses of standing live timber require a permit unless specified in writing.
- **Harvest Limit:**
  - Dead or Downed Timber: No limit for subsistence harvest of dead or downed trees.
  - Standing Live Timber: Up to 120 trees, including both dead and downed, for subsistence house and cabin log permits. An amount reasonably needed for heating and cooking a primary place of residence for subsistence firewood permits. Case-by-case basis for other subsistence purposes.
- **Stump Height:**
  - Dead or Downed Timber: Stumps will be cut as low to the ground as possible with a maximum 12” height above the ground surface or the snow surface.
  - Standing Live Timber: Stumps will be cut as low to the ground as possible with a maximum 12” height above the ground surface or the snow surface.
- **Branch Disposal:**
  - Recommended removing the requirement.
- **Waterbody Restrictions:**
  - Dead or Downed Timber: Recommended removing restrictions.
  - Standing Live Timber: Harvest of standing live timber is prohibited within 25 feet of stream bank.
- **Harvest Location:**
  - Dead or Downed Timber: All cultural resources will be avoided. The harvester will not injure, alter, destroy, or collect any cultural resource site, object, or structure. If a cultural resource is inadvertently discovered during authorized activities, the harvester will cease activity, protect the resource, and notify the park Superintendent immediately. Harvest using thinning techniques, no clearcutting. Harvest is prohibited within 200 feet of private property not owned by the harvester.
  - Standing Live Timber: The same recommendations plus the addition of, harvest of standing live timber is prohibited from slopes steeper than 30

percent (i.e., 30-foot change in elevation over a 100-foot horizontal distance).

- Transportation:
  - Dead or Downed Trees: No permanent roads or trails may be intentionally constructed. Minor brushing of snowmachine trails is not considered to be road or trail construction and is allowed. Skidding of whole logs is limited by ground conditions and season to protect resource values and is generally limited to frozen ground with a minimum of 6-12” of snow cover. Log skidding operations will cease if ground disturbance occurs. During periods when the ground is not frozen and snow covered, harvest logs must be transported in a way that does not involve serious ground disturbance.
  - Standing Live Timber: Same recommendations with the addition of, for permits, Superintendent will designate access routes to be used for harvesting and skidding subsistence logs. Subsistence logs may not be harvested further than one-half mile from a designated access route.
- Other Conditions:
  - Dead or Downed Timber: Use of portable motorized chainsaws (no more than 10 horsepower) is authorized to harvest logs for subsistence purposes; all spills of oil, petroleum products, and hazardous substances associated the use of motorized equipment to harvest or transport the logs must be reported to the Superintendent as well as to the Alaska Department of Environmental Conservation (ADEC) in accordance with Alaska law; immediate actions will be taken to confine the spill to the smallest possible area; and all garbage, equipment and personal property must be removed from the harvest area upon completion of harvest for the season.
  - Standing Live Timber: same recommendations.

Mercedes Knighten asked about the stump height. She understands that six inches is low, but stumps are hard to get around. Kaleb Rowland said in the winter, you are accessing areas you cannot access in the summer, and the intent was to get the stump as low as possible but to avoid tight restrictions that might lead to a ticket. Mercedes Knighten asked about the significant ground disturbance for skidding. Kaleb Rowland said the group changed the language to serious ground disturbance from the original language of no ground disturbance. Mercedes Knighten asked about the distance from the creeks. Kaleb Rowland said the dead beetle kill is close to the creek and he was about easing restrictions, not making them tighter.

### **iii) Opportunity for public input:**

Bruce Gordon said evergreens, such as spruce, needed bare ground to germinate.

David Sarafin, fisheries biologist, said that with warming waters, the need for the distance from the stream banks is to shade the creek body and protect the water temperature, and he would ask if 25 feet would be suitable for that purpose. Kaleb Rowland said the working group discussed shading and came up with the recommendation of 25 feet.

**iv) SRC discussion and recommendation:**

Bruce Ervin asked for a map to see where users could harvest trees. Barbara Cellarius said there were no specific limitations on where people could harvest logs for subsistence purposes on federal public lands in the park and preserve except for stipulations in the policy such as steep slopes or close to stream beds.

Mercedes Knighten asked what the Environmental Protection Agency recommendation was for distance from streams. Barbara Cellarius said the park staff would look into it.

Suzanne McCarthy reminded the Commission that they were just talking about subsistence users and not to lock down with hard rules. Sue Entsminger said the draft policy from the Park Service was the first. Barbara Cellarius explained that the park is proposing to revise a policy that was developed in 1989; it isn't a new policy. When the current green log policy was developed, there was not much beetle kill. One of the reasons the policy needs to be revised is changing environmental conditions.

Sue Entsminger said she was uncomfortable making concrete regulations. Kaleb Rowland said the goal was to ease back on regulations, and that the park's policy was pretty strict.

Mercedes Knighten asked about Ahtna lands. Barbara Cellarius said National Park Service policies only apply to National Park Service-managed lands. Kaleb Rowland added there was a stipulation for standing dead and green timber that one cannot harvest within 200 yards of other landowners.

Nathan Brown made a motion to adopt the draft recommendations of the working group, which Dan Stevens seconded. Kaleb Rowland asked about adding the "unless otherwise specified in writing" on the standing live permit, which is related to the recommendation for timber harvest for small bridges. Nathan amended his motion, and Dan seconded. The motion passed by unanimous consent.

**b) The use of small bridges for subsistence access**

i) **Introduction:** Kaleb Rowland provided background on the use of small bridges for accessing subsistence resources, which for his family, was related to a trapline.

ii) **Opportunity for public input:** There was no public comment.

**iii) SRC discussion and recommendation:**

Kaleb Rowland explained how his family used logs to make temporary bridges to cross streams to access a trapline. The topic was necessary to add to the compendium because currently, a small bridge is a structure, and a structure needs a permit.

The recommendation to authorize the harvest of up to five live standing trees greater than three inches in diameter at ground height, along with an unlimited number of standing dead or down trees without the need for an individual permit. Additional materials not requiring a permit, such as live trees less than three inches in diameter at ground height, may also be harvested and used as part of the bridge construction, for example, the decking and cross pieces. These bridges are not considered installations,



structures or facilities, and thus are not subject to the permit requirements of 36 CFR 1.6 and 36 CFR 5.7 if they're temporary, as defined in 36 CFR 13.1, not to exceed 12 months, not the 30-day limit for temporary facilities in 13.166, and provide access for subsistence uses.

Sue Entsminger said it was difficult to get a snowmachine across a stream that didn't freeze, and they would use dead logs and throw tree limbs over it, and by the next year, it was gone. Kaleb Rowland added that the stipulation about standing green timber was to be able to use a green tree if there was not a big enough dead tree available. Sue agreed with keeping it broad.

Mercedes Knighten made a motion to adopt the recommendations from the working group on small bridges, which Kaleb Rowland seconded. The motion passed by unanimous consent.

**c) Proposed Superintendent's Compendium entry regarding the external boundaries of the resident zone**

- i) **Introduction:** Barbara Cellarius introduced the topic. No changes occurred to the compendium after the last SRC meeting, and the working group met for another meeting to develop recommendations. Barbara discussed non-rural determinations by the Federal Subsistence Management Program and that ANILCA identified local, rural residents were allowed subsistence uses in the national park. To operationalize the local, rural priority, the Park Service has resident zones, which are based on customary and traditional uses of the park/monument, not biological concerns. The requirement to live in the resident zone is in addition to having a federal subsistence customary and traditional use determination for species and area of intended harvest.

The proposed change would clarify the external borders of the park resident zone in three locations: the western boundary of Glennallen, the northern boundary of Gakona/Gakona Junction, and the southern boundary of Tonsina. The park currently has 23 resident zone communities, 18 of which were designated in 1981. Five additional communities were added in 2002. In previous discussions, the Commission had been clear it was not interested in clarifying boundaries between communities within the resident zone. A local subsistence user recommended defining the external boundaries in writing. The goal is to provide clear information to staff and the public about eligibility to hunt in the park in compliance with federal regulations and NPS regulations.

The park recommended using the census designated place boundaries, particularly as a place to start, to clarify the boundaries:

- the western boundary for Glennallen would be at Tolsona Creek (Mile 173 of the Glenn Highway);
- the southern boundary of Tonsina would be the Little Tonsina River (Mile 65 of the Richardson Highway);
- and the northern boundary of Gakona Junction would be Mile 138 on the Richardson Highway.

- ii) **Report from the working group on resident zone boundaries:** Sue Entsminger introduced the report of the working group. The working group members were Clint Marshall, Dan Stevens, Sue Entsminger, Suzanne McCarthy, and Karen Linnell from the Ahtna Intertribal Resource Commission. Some members were not able to attend the first two meetings, but all members attended the meeting on September 24. Although not unanimous, the working group recommended the following:
- Southern boundary of Tonsina: use the Little Tonsina River, which crosses the Richardson Highway at Mile 65.
  - Northern boundary of Gakona/Gakona Junction: use Mile 138.2 of the Richardson Highway, which is where Popular Grove Creek crosses the highway.
  - Western boundary of Glennallen: use 500 meters west of the west side of Tolsona Creek, which crosses the Glenn Highway at Mile 173.

Suzanne McCarthy said that in the 1990s, there was concern about populations expanding in rural areas that would impede on subsistence rights, and she would say fewer people live in the region now. The concern now was that communities are dwindling. She did not think many people were confused about whether they qualify or not. She was concerned that communities would be locked out of subsistence activities, like in Cordova, where two park staff visited and did not have any responses. She did not feel any need to draw hard and fast lines and hesitated to support it.

Sue Entsminger said her husband had been on the SRC when they were discussing boundaries, and some of that had been restrictive. Kaleb Rowland asked what would happen if the SRC opposed it. Superintendent Ben Bobowski said the park would have to regroup if there was not a recommendation. Kaleb Rowland said if the status quo remained, there would still be people who were 300 yards past the boundary. Ben Bobowski said it could be miles in difference. Sue Entsminger asked if the park was looking to put it in regulation, which Ben Bobowski indicated was not planned. Sue Entsminger said it was important for the Commission to know that it would not be a regulation, but in the compendium, which is reviewed every year.

Suzanne McCarthy said the Commission's job is to stand up for subsistence rights for local people and asked the park if they could provide a report about the people who were unsure of their eligibility. Barbara said there would be a data issue due to C&T for some of the communities.

iii) **Opportunity for public input:**

Kirk Wilson of Tolsona said it was important for residents to know about the park and the preserve. He said the people who would truly qualify before 1980 in the Tolsona community would be few. There were a lot of new people in Tolsona. From the time he came to Tolsona to now, all the old people have gone.

- iv) **SRC discussion and recommendation:** Kaleb Rowland made a motion to support the working group's recommendation with the stipulation that it was put in the

compendium and not moved into federal regulation to allow for review in the future. Nathan Brown seconded the motion.

Kaleb Rowland said it was a contentious subject, so it was important to keep it in a working document and not federal regulation. He said it was about park land and living in the park was a huge commitment. People who live in the park should get the benefits of living in the park. Dan Stevens agreed. Sue Entsminger asked for a roll call vote. The motion passed five in favor and two against.

### **13) New business actions**

#### **a) December 2024 SRC Chairs Workshop**

- i) **Feedback on workshop agenda:** Barbara Cellarius asked what topics the Commission wanted the NPS Regional Director to address in her comments at the SRC Chairs Workshop, which is an opportunity for the SRC chairs from around the state to get together to share information and hear presentations related to the NPS subsistence program. Kaleb Rowland said he would like to know the process of how rangers make contacts during hunting season, in particular, the planning that goes into it. Mercedes Knighten said when she flew over the Wrangells to Chisana, she saw several trails where it looked like planks had been destroyed. She wanted to know how materials not used in trail construction were cleaned up and also expressed concern about seeing multiple trails and whether there were maps about the trails people should be using, instead of making new trails.

Barbara Cellarius asked if it was useful to include brief presentations on current research projects as part of the workshop agenda. Sue Entsminger said she remembered going to a workshop where the chairs spoke to each other and gave reports on their parks. When she went to the one last year, there were only three chairs compared to 25 or 30 NPS staff. She said she'd like time for the chairs to talk, even for a morning. Barbara Cellarius said they were planning for more time for chairs to speak and parks were only sending two staff. Nathan Brown said he would like to see presentations to see what other parks are doing. Suzanne McCarthy said it was a great idea and that you could gain insight from talking to other groups.

- ii) **Identify topics and concerns to share at workshop:**  
Sue suggested bringing up Mercedes Knighten's concerns about the trails, which Mercedes stated might be between the Dadina and Nadina rivers. Nathan Brown said wildlife population management and how managers work together with data to manage the populations and how to bring the populations back up.

#### **b) Review and comment on proposals to change subsistence fisheries and wildlife regulations**

- i) **Timely updates to inform proposal comments:** No updates were shared.
- ii) **FP25-03a: Tolsona C&T for salmon in the Chitina subdistrict:**
  - **Introduction:** Cultural Anthropologist Amber Cohen provided a summary of the proposal, which requested the Federal Subsistence Board recognize the customary and traditional use of salmon in the Chitina Subdistrict of the Upper Copper River

District by residents of Tolsona. Tolsona is a small community that is located at the base of Tolsona Mountain and is about 14 miles from Glennallen. In 2023, Tolsona had an estimated population of 11 residents. The boundaries used in this analysis were those of the Tolsona Census Designated Place [mile markers: 166-173]. Based on the results of a recent community harvest survey, residents of Tolsona exhibit reliance upon a wide diversity of fish and wildlife resources in the area. Residents harvested an estimated 311 pounds of wild foods per person and on average surveyed households harvested 9 different resources and used 14 different resources. Salmon made up an estimated 41% of the total harvest (about 128 pounds of food per person). Sockeye salmon was the top resource used by the community that year in terms of edible weight. For that 2013 study year, 50% of the eight surveyed households gave away salmon and 80% received salmon. Most of the sockeye salmon harvest was obtained through fish wheels, which are more common in the Glennallen Subdistrict than in the Chitina Subdistrict, although a smaller amount was harvested by rod and reel and dip net. Chinook salmon made up 4% of the total salmon harvest, and most were harvested by fish wheel, although 33% were harvested by rod and reel. Information on processing methods and passing on of knowledge were not readily available, but the proponent did provide written testimony about families fishing together.

Permit data showed that no permits were issued to a resident of Tolsona for the state Chitina Subdistrict personal use fishery between 2002 and 2023, but a few Tolsona residents have fished in the Federal subsistence Chitina Subdistrict fishery under permits issued in error. For the state's Glennallen Subdistrict fishery, an average of 2.6 permits were issued to residents of Tolsona per year between 2002 and 2023.

The Office of Subsistence Management preliminary conclusion was to support the proposal due to the residents of Tolsona having a pattern of fishing that exhibits the characteristics of customary and traditional uses of salmon in the Chitina Subdistrict of the Upper Copper River District. Sockeye salmon was a top resource for Tolsona residents in terms of weight harvested and also widely shared.

- **Opportunity for public input:** Kirk Wilson of Tolsona asked whether the request would lead to the qualification for hunting in the national park. Amber Cohen said those were two separate processes.

Matt Warnick of Tolsona said he had no additional comments but was strongly in favor of the proposal. He worked through the Tolsona Community Corporation to write the proposal with members of the community. Sue Entsminger asked what the feeling of the people was on the proposal. Matt Warnick said that a document was provided to the park that had eight or ten signatures on it.

- **SRC discussion and recommendation:** Kaleb Rowland made a motion to support proposal FP25-03a. Suzanne McCarthy seconded the motion. Dan Stevens said the Chickaloon people came from the Chitina area, and that many

were his first cousins. Kaleb Rowland said the written public comment stated that people who should use resources should date back to when the park was made. Barbara Cellarius said there was confusion between the resident zone request and the C&T request. Suzanne McCarthy said a lot of them dip net instead of using fish wheels, so this proposal would allow them to dip net in the traditional place in Chitina.

Sue Entsminger asked Matt Warnick why he put the proposal in, and he said that was where they traditionally fished and that access above the bridge was difficult. Sue asked if they used boats for access, and Matt said they would drive and walk or drive and use an ORV to the canyon area.

Kaleb Rowland said Tolsona residents had historically used these fisheries and thought the ten different testimonies were a testament to the amount of people who used the resources. Nathan Brown agreed that they provided the testimony. The motion passed by unanimous consent.

iii) **FP25-03b: Tolsona C&T for freshwater fish in the Upper Copper River drainage**

- **Introduction:** Amber Cohen introduced the proposal requesting that the Federal Subsistence Board recognize the customary and traditional use of freshwater fish in the Copper River drainage upstream from Haley Creek by residents of Tolsona, which was submitted by the Tolsona Community Corporation. Residents of Tolsona had documented use of freshwater fish species such as burbot, trout, char, and whitefish. Fish search and harvest locations were not documented for Tolsona specifically but instead for three combined communities (Tolsona, Nelchina, and Mendeltna), which listed locations in the Copper River drainage upstream from Haley Creek. None of the named search locations were federal public waters located within or adjacent to Wrangell-St. Elias National Park and Preserve, the Gulkana National Wild and Scenic River, or non-navigable waters associated with the Bureau of Land Management general domain land.

The Office of Subsistence Management's preliminary conclusion was neutral due to needing additional information and feedback through the regulatory process to determine whether residents of Tolsona meet the eight factors for determining customary and traditional use of freshwater fish in the proposal area. One public comment was received in opposition to the proposal.

The SRC took no action on the proposal.

iv) **WP25-01: Nelchina caribou seasons, hunt management, and 804 user prioritization analysis**

- **Introduction:** Barbara Cellarius summarized the OSM staff analysis for WP25-01, which was an out-of-cycle special wildlife request submitted by the Office of Subsistence Management. If adopted, the Nelchina caribou hunts in Units 11, 12, and 13 remainder would be changed to may-be-announced seasons under delegated authorities, and the residents of the communities identified under the

ANILCA 804 user prioritization analysis would be able to hunt. The preliminary conclusion by OSM was to support with modification.

- The suggested modified regulation would read:
  - (a) For federal public lands in Unit 11 north of the Sanford River, the eligible communities would be Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, and Slana/Nabesna Road.
  - (b) For Unit 11 remainder, the eligible communities would be Chitina, Copper Center/Silver Springs, Kenny Lake/Willow Creek, Gakona, Glennallen, Gulkana, McCarthy Road, Tazlina, and Tonsina.
  - (c) For Unit 12 remainder, the eligible communities would be residents of the Al-Can border, Dot Lake, Mentasta Pass, Northway, Tanacross, Tetlin, and Tok.
  - (d) For Unit 13A, the eligible communities would be Chickaloon, Chitina, Copper Center/Silver Springs, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona.
  - (e) For Unit 13B, the eligible communities would be Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina.
  - (f) For Unit 13C, the eligible communities would be Chistochina, Gakona, Glennallen, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona.
  - (g) For Unit 13D, the eligible communities would be Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina.
  - (h) For Unit 13E, the eligible communities would be Cantwell, Chase, Denali Village, and some areas along the park's highway.

Sue Entsminger was concerned about getting in-depth into the analysis when they did not know the Nelchina herd caribou numbers. Bruce Ervin asked why Healy Lake was not included in Unit 12 remainder, and Barbara Cellarius said they potentially harvested caribou elsewhere. Kaleb Rowland said he would defer to those who lived in an area where they used the Nelchina caribou. Suzanne McCarthy said there was so much information that they had to be careful, and that she worried about the herd. Nathan Brown asked what the herd number would have to be for the hunts to open. Barbara Cellarius said that was a good question to ask.

- **Opportunity for public input:** Copper Center resident Faye Ewan said there should be a study of the past 50 years of management to understand how the caribou numbers had dwindled. She wanted to see studies on climate change, lichen, and environmental feasibility study on the food chain. She wanted to know if they joined another group. There was more traffic and other things that did not use to exist in the Copper River region. She remembered when the state opened to two female and three bulls and then she knew, when you start slaughtering the females, that is when you need the bull ratio to meet the needs. She had not seen one caribou. She was concerned about the ten-year recovery. She said they depended on sheep and caribou before moose came into the area, and her parents' people live off caribou.

AITRC consultant Jim Simon said that a few years ago, Ahtna, Inc. and AITRC called for the Board of Game to put a hunting moratorium on the Nelchina herd, because it was at half of the management objective. Hunts were still offered, but the tribal stewardship was bulls only. To have half the number of caribou for management objectives and still offer all uses for hunts was a concern. Had the 804 prioritization been requested years ago, there could have been a limited subsistence caribou hunt opportunity for any Nelchina bulls present within the range of the Mentasta herd. The analysis was well done, looked at the history of state and federal harvest, looked at harvest records to understand who was customarily and traditionally most dependent. He said to consider it like refining a customary and traditional use determination, and that the biological triggers to open a hunt would be discussed later.

Kathryn Martin said Ahtna, Incorporated supported the proposal and the ability for agencies to close the hunt if needed. They also supported the 804 user prioritization analysis. They knew who was dependent on caribou, but they needed to document it through this process. They are concerned about the population of the caribou. Sue Entsminger asked about an open season for the next year. Kathryn Martin said in her personal opinion, there should not be an open state or federal season if the numbers were low.

Barbara Cellarius said the proposal would eliminate existing seasons and replace them with may-be-announced seasons. Sue Entsminger asked if this was flexible, and Barbara Cellarius said every two years, the regulations can be changed.

Bruce Ervin said the public comments showed people supported it, but he worried someone might open it next year. He wondered if there was a way to limit for two to three years until opening. Nathan Brown said if they do not adopt the 804, the hunts would be closed. Sue Entsminger said the hunts were on the books, and unless the Federal Subsistence Board closed it, and then all people would be qualified to hunt. She wanted a working group. Mercedes Knighten said she supported it but was concerned about the closures inhibiting peoples' connection to the land and being able to harvest caribou. Women were able to hunt caribou together, and they were missing that connection. They were also losing traditions such as working on hides and making clothing with the caribou; it was not just about feeding families.

- **SRC discussion and recommendation:** Bruce Ervin made a motion to adopt the proposal as modified by OSM, which Kaleb Rowland seconded. Dan Stevens said that when he was growing up, there were caribou all over, and they needed to close the hunts to make sure to keep the caribou. The motion passed by a roll call vote with seven in support and none opposed.

Nathan Brown made a motion to create a working group to review the list of communities in the Nelchina caribou ANILCA 804 user prioritization analysis. Bruce Ervin seconded. The working group members are Bruce Ervin, Dan

Stevens, Mercedes Knighten, and Nathan Brown. The motion passed by unanimous consent.

**c) Review and comment on relevant proposals to the Alaska Board of Fisheries**

i) **Timely updates to inform proposal comments:** Fisheries Biologist Dave Sarafin introduced the topic, which is the opportunity to comment on proposals for the Board of Fisheries meeting in December in Cordova, and provided a fisheries report. The Tanada Creek weir sockeye count was 14,704 and 13 Chinook, which were under the long-term average of 18,000 sockeye. The Copper River salmon run was similar to recent years where it began slow and then increased in strength. Total sonar passage of 946,188 sockeye salmon was 58% above their management objective. There were Chinook salmon concerns this year, and the overall abundance will likely fall short of the minimum bound of the sustainable goal range of 21,000 to 31,000 fish. There were several state closures on Chinook salmon. For the federal fishery, there were 202 Chitina permits, 293 Glennallen permits, and 2 Batzulnetas permits issued. Harvest reports were still coming in. Since the management strategy changed for the Chitina subdistrict, more people had been harvesting in the Chitina subdistrict. The lower Copper River federal fishery had 80 permits issued, and the total in-season harvest was 425 sockeye and 2 Chinook salmon.

ii) **Proposal 51: Revise Copper River District Salmon Management Plan**

- **Introduction:** Ecologist Mark Miller gave a presentation on the proposal. Federal subsistence users in the Upper Copper, Gakona to Slana reach, have not met their permit level harvest “amounts necessary for subsistence.” There was increasing variability in run strength and harvest. Observed sonar passage has increasingly lagged behind expected sonar passage. There has been high early season commercial harvest despite changing run characteristics. For a given year, maximum commercial harvest occurred during statistical week 22 in late May. The fish that pass early in the season, based on telemetry studies, genetics and TEK, are often the earliest fish in the river and headed to the upper portion of the drainage. The proposal was meant to reduce the persistent imbalance and enable a greater number of Upper Copper River salmon to enter the river to reach their headwater tributaries.

Bruce Ervin asked whether the early commercial fishery catch caused a late salmon run. Mark Miller said it was a potential explanation. Kaleb Rowland asked what the proposal was. Mark Miller said if the cumulative sonar count did not reach the management objective of the season after two commercial openings, there would not be a third opening. Sue Entsminger asked whether the commercial fishery occurs during or before the sonar passage. Mark Sommerville said the commercial fishery started around May 15 and the sonar is not in until May 20th or 21st. The objective of the manager is to manage along the pre-season expected curve of the sonar passage. Sue Entsminger asked how that had worked. Mark Sommerville said in the past five years, it had been behind the curve, but if one went back ten years, the sonar passage was ahead of the sonar expected.



Bruce Ervin asked how the ADF&G kept track of how many salmon make it to the Upper Copper. Mark Sommerville said escapement was based on subtracting harvest from the sonar passage. Sue Entsminger asked about the mortality of fish. Mark Sommerville said there was no way to determine it. The more managers speculate on fisheries, then the less precise the management will be. Mark Miller said there were periodic research projects that looked at mortality, one was an ongoing telemetry project that found high level of in-river mortality for one year came from a high flow event from warmer weather.

Mercedes Knighten said it was clear that the Upper Copper was not getting enough fish and that there needed to be something done to have more fish in the river. The commercial fishery had three or four openers, while the Upper Copper was waiting for ice to stop blocking the river. They had to let the commercial fleet know that people who live on this river need fish upriver for them to survive.

Bruce Ervin said it was part of the culture to let the first fish go by. He heard on the Yukon there were similar stories of letting the fish go and celebrating their long way to travel. He asked if the decreasing size of salmon had to do with gear. Mark Sommerville said the decreasing size had been going on for decades and likely had to do with food out on the gulf and what age they returned to the river.

- **Opportunity for public comment:** AITRC Consultant Jim Simon encouraged the commission to support the proposal and thanked Mark Miller and Ben Bobowski for their multi-year response to the issue brought up at a Cheesh'na Tribal Council meeting. Cheesh'na asked AITRC to look into the amounts necessary for subsistence (ANS) and found that from Gakona to Slana, it was failing to meet ANS for many years. While they had asked for the superintendent to take action to mitigate the larger proportion of salmon taken by commercial fishery, they appreciated the park for submitting this proposal. The state fisheries had closed to retention of king salmon, while the commercial fishery harvested over 5,000 fish. The Copper River kings are the first ones to go on the market and end up in a restaurant in Seattle before they arrive at the Miles Lake sonar. The proposal would slow the harvest down after the first two commercial openings. Jim said they needed to look at the in-river mortality past the sonar as well. It was important to get a handle on the fishery, so it did not turn out like the Yukon. Kaleb Rowland asked why there was not a sonar closer to the mouth of the river. Jim said they need one upriver to see if fish were making it to the spawning grounds.

Chitina resident Bruce Gordon said they had long and cold springs in Chitina and asked if there was a temperature logger information that pre-dated the sonar.

ADF&G Fisheries Biologist Mark Somerville said he was unsure if there was historic temperature monitoring on the Copper River but there were changes in the short term with break-up, ice, and low flows that affected salmon entry into the river. He said the overall run timing to the Copper River had not significantly altered.

Nabesna Road resident Victoria Rego echoed support of the proposal as she had seen a decline in being able to meet her family's need and their community elders' needs, and she appreciated the work and science that went into the proposal.

Kathryn Martin said the Ahtna Incorporated Customary and Traditional Committee supported the proposal. The first run goes up the river and hits the Slana River before going behind Mentasta to Bone Creek and then Bone Lake where the king salmon spawn—that was a long way to go. They were not seeing king salmon in the area. The sockeye salmon go up the Slana River to Mentasta Lake and then spawn in Fish Creek. When she was growing up, they could see the creek filled with salmon, and now they hardly saw salmon spawning there. The Native people in Batzulnetas knew that the smaller salmon spawned in Suslota Lake and that in Suslota meant small salmon. The last run that hits the Copper River goes to Batzulnetas to Tanada Lake, and Batzulnetas salmon were bigger, fatter, and came later in the season. When they worked on the regulations for Batzulnetas fishery, they had asked the season to go until the end of September.

Copper Center resident Faye Ewan said she agreed the commercial fishery fished out the first run. They let the first fish go by because they knew it would go upriver to spawn. She strongly supported the proposal and had asked for it for a long time.

- **SRC discussion and recommendation:** Kaleb Rowland made a motion to adopt all three proposals (51, 52, and 53), and Nathan Brown seconded. Kaleb said the public testimony had been in support of these proposals, and he learned that the early salmon runs went up the river. The data from the presentation matched the public testimony that people up-river used to see a lot of fish in their streams and now they did not. Dan Stevens said in Chitina, it was believed that the first fish had to go up the river. Sue Entsminger said it was heartbreaking to know that Fish Creek was no longer red with salmon. Escapement was important for the resource. Mercedes Knighten said that subsistence users took on the burden of the conservation of the river and asked that the commercial fishermen share the burden. It was not just getting the first run up the river but also the second run. Kaleb Rowland added that Seattle should not get salmon before people who live on the river. The motion passed by unanimous consent.

iii) **Proposal 48: Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict:** Kaleb Rowland made a motion to support Proposal 48, which Dan Stevens seconded.

- **Public comment:** AITRC Consultant Jim Simon encouraged the commission to oppose the proposal. Subsistence was defined in state and federal law as non-commercial. He saw a video of a man with 200 salmon that he did not know what to do with, and that was not customary and traditional use.

- **SRC discussion and recommendation:** Kaleb Rowland supports repealing the prohibition because he was concerned that if the state prohibited hiring of a boat to get fish, so would the federal program. It was the best way for him to get fish. Sue Entsminger said in the state subsistence fishery, everyone qualifies. She asked Kaleb if he wanted to go out on a boat, did he hire a commercial entity or find someone he knew. Kaleb said in the past, they had hired a guide. Bruce Ervin felt the same way as Sue, although he also emphasized with Kaleb. He did not feel comfortable having guide services above the bridge. Mercedes Knighten was against the proposal and while she acknowledged it is difficult to get access to the Copper River, the state is working on ways to open access, such as the proposal to put a Gulkana boat ramp near the airport. Suzanne McCarthy and Nathan Brown agreed they were against the proposal.

Kaleb Rowland said in reference to the video where someone caught 200 fish, that was wanton waste, and it was the individual user's responsibility to know how much they can keep and process.

Sue Entsminger said when you start seeing something being abused, it was worth being concerned about. Sue asked for a roll-call vote. The motion failed with six against and one abstention.

iv) **Proposal 50: Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts:** Nathan Brown made a motion to support Proposal 50, which was seconded by Dan Stevens.

- **Public comment:** Copper Center resident Faye Ewan said she had an issue with guiding in the Copper River. She did not start fishing until July 19, and when the boats came through, their waves hit her wheel and the banks were eroding. She had issues with trespassers from boats. Some stole her fish out of her wheel. She said there should be protection on a fish wheel. She was one of the four people who had a wheel in Kluti-Kaah, and it took a lot of funds and effort. The state had mismanaged fishing and hunting.

AITRC consultant Jim Simon said the proposal had been addressed by the Board of Fisheries three years ago and failed. He was concerned about a shift in the fishery where boat-based dip-netters using these technologies to target fish in the middle of the river where they are holding up and it changed the nature of the fishery from shore-based to boat-based. He supported the proposal to support a customary and traditional way of shore-fishing.

- **SRC discussion and recommendation:** The motion passed by unanimous consent.

v) **Proposal 54: Restrict use of Copper River District inside closure area during statistical weeks 20 and 21:** Mercedes Knighten made a motion to support Proposal 54, which Nathan Brown seconded.

- **Public comment:** None.

- **SRC discussion and recommendation:** Mercedes Knighten said this should not be happening and that they were overfishing. The motion failed by voice vote, one in support and five in opposition.
- vi) **Proposal 70: Extend the lower boundary of the Chitina Subdistrict:** Fisheries Biologist Dave Sarafin explained that the proposal would extend the lower boundary of the Chitina Subdistrict. Mercedes Knighten made the motion to support Proposal 70, which Bruce Ervin seconded.
- **Public comment:** AITRC Executive Director Karen Linnell said the proposal would open the Chitina personal use fishery into another district (Lower Copper River fishery) and she opposed the proposal. AITRC Regulatory Specialist Deanna Kosbruk said that the disturbance of motors in that area where the fish rest will affect the salmon.
  - **SRC discussion and recommendation:** Mercedes Knighten said she would vote against it because she did not want to open up the two nearby creeks to the disturbances. That was where the fish rest before they go into the canyon. There are also trespass issues in that area. The motion failed by a voice vote of none in support and six opposed.
- vii) **Proposal 89: Increase the bag and possession limit for burbot in Lake Louise:** Mercedes Knighten made a motion to support Proposal 89, which Nathan Brown seconded.
- **Public comment:** None.
  - **SRC discussion and recommendation:** Mercedes Knighten said she lived near the area and used Lake Louise for fishing. The population of burbot had increased. Burbot was a good resource for the people. She would support getting more burbot to families. The motion passed by unanimous consent.
- viii) **Proposal 90: Modify bag and possession limits of burbot in Crosswind Lake:** Mercedes Knighten made a motion to support Proposal 90, which Bruce Ervin seconded.
- **Public comment:** None.
  - **SRC discussion and recommendation:** Mercedes Knighten said there had not been any issues with lake trout. There was another lake that was used for fishing for burbot. It was unlikely people were catching a lot of lake trout when getting burbot. She was going to vote against the proposal due to reducing the harvest limit for burbot. The motion failed unanimously by voice vote.
- d) **Review and comment on proposals to the Alaska Board of Game**
- i) **Timely updates to inform proposal comments:** No updates were given.
  - ii) **Proposal 59: Lengthen wolf trapping season in Unit 11:**
    - **Introduction:** Barbara Cellarius introduced the proposal, which was submitted by the SRC and would lengthen the wolf trapping season in Unit 11 from November

10-March 31 to October 15-April 30. This would align the Unit 11 season with the season dates in Units 12 and would provide additional opportunity to harvest wolves.

- **Opportunity for public comment:** AITRC consultant Jim Simon supported the proposal and said the use of wolves was customary and traditional and would increase subsistence activity.
- **SRC discussion and recommendation:** Nathan Brown made a motion to support Proposal 59, which Kaleb Rowland seconded. Nathan said extending the season would help with the low caribou numbers and mitigate predation issues. It would also be customary and traditional use. Kaleb Rowland asked whether you could harvest wolves with a rifle under a trapping license, to which Barbara Cellarius said on National Park lands, there was a limit on when you could use a firearm under a trapping license. Kaleb said the wolf hunting season opened earlier than the trapping did. The motion passed by unanimous consent.

iii) **Proposal 60: Lengthen coyote trapping season in Unit 11**

- **Introduction:** Barbara introduced the proposal, which was submitted by the SRC and would lengthen the coyote trapping season in Unit 11 from November 10-March 31 to October 15-April 30. This would align the trapping season with the one in Unit 12 and provide additional opportunity to harvest coyotes.
- **Opportunity for public comment:** None.
- **SRC discussion and recommendation:** Nathan Brown made a motion to support Proposal 60, and it was seconded by Kaleb Rowland. Mercedes Knighten said it would allow for the customary and traditional practices to take place if the season was extended and could increase the knowledge base about trapping. The motion passed by unanimous consent.

iv) **Others:**

**Proposals 4, 45, and 56: Hunting seasons and bag limits:** Kaleb Rowland made a motion to support Proposals 4, 45, and 56 for various archery-only sheep, moose and, goat seasons and stated his intent was to oppose his motion. Nathan Brown seconded the motion.

- **Public comment:** AITRC Executive Director Karen Linnell said they were opposed to any special hunts for bow hunters who have other opportunities and do not need their own season. Nabesna Road resident Michael Rego agreed with Karen and said he was concerned about the length of the season and opening another season when harvest was down for moose and sheep.
- **SRC discussion and recommendation:** Kaleb Rowland spoke against the proposal, saying that the season they want to open from July 21 to 31 is in the middle of summer. It would be difficult to keep meat in a backpack and not have it spoil. The season is not viable from a meat care standpoint. Bow

hunters have a month to hunt, and they can go where there are not rifle hunters. The motion failed unanimously.

**Proposal 49: Eliminate the harvest of Nelchina caribou:** Mercedes Knighten made a motion to support Proposal 49, which Kaleb Rowland seconded.

- **Public comment:** AITRC Executive Director Karen Linnell said AITRC submitted this proposal to close state hunts for the Nelchina caribou herd. Last fall, there were less than 8,000 individuals in the herd, and they are still waiting for public census counts for this year. There is an expected twelve to fifteen years for herd recovery, and that is over a generation of folks who will be unable to hunt the herd. They included other units due to the Nelchina herd movement, and that the Talkeetna herd was an extension of the Nelchina herd. Two permits had been given away by the Governor for that herd. If actions were not taken to close the hunt, rather than by emergency order, then it will take the herd longer to recover. Salcha resident Jim Simon commented that he supported the proposal, and he noted that there is not a waterbody in the area where the Nelchina caribou are that does not have an ATV trail on it. He was concerned about their habitat. He also referred to his previous comments on the ANILCA section 804 user prioritization analysis.
- **SRC discussion and recommendation:** Mercedes Knighten said it was disappointing that other user groups had access to the Nelchina caribou when subsistence users could not hunt them. It was difficult to know what hunts they could apply to or how to get into another hunt. She supported the proposal to have more regulations on those non-local users. The motion passed by unanimous consent.

**Proposals 2 and 3:** Nathan Brown brought up Proposals 2 and 3, but the Commission took no action on them.

**Proposal 131:** Sue Entsminger brought up Proposal 131, but the Commission took no action on it.

e) **New project funding to address community subsistence food security resilience**

- i) **Update on outreach and proposals received:** Barbara Cellarius gave an update on the Inflation Reduction Act funding opportunity offered by NPS to support community subsistence food security resilience. As of September 30, the park had received 12 proposals. They will get back to applicants in November. There was funding remaining and one proposed project could be expanded to add more communities. One gap in the coverage by projects is Alaska Highway communities between Tanacross and Northway.

Sue Entsminger asked if there were any projects from communities off the Tok Cutoff. Barbara said there were two from Slana, one from Chistochina, and one from Gakona. Sue asked what projects those were, and Barbara replied they were for fish wheels and food processing facilities, among others.

Mercedes Knighten suggested getting involved with the school district to do food resilience projects. She was also involved with a group where they preserved blueberry seeds and planted them in new areas. Dan Stevens said when growing up in Spenard, he did grow wild berries in his garden, so it was possible to transplant wild plants into a home garden.

ii) **Opportunity for public input:** AITRC Anthropologist David Hooper said one project he had been thinking about would be going out and collecting blueberries, cranberries, and other berries, raise them in greenhouses, and make them available to people.

iii) **SRC discussion of project ideas and possible partners for any remaining funding:** No discussion occurred.

f) **Fisheries Resource Monitoring Program Priority Information Needs:** Barbara Cellarius introduced the topic, and Dave Sarafin provided information on the use of the priority information needs. The Fisheries Resource Monitoring Program had funded the Tanada Creek Weir since 2000 and the Long Lake Weir had been funded by it for some time. Dave also had a burbot assessment that was funded.

Mercedes Knighten said she supported the Southcentral and Eastern Interior Priority Information Needs. Kaleb Rowland asked if an additional priority information need could be the impact of golden and bald eagles on lambs. Barbara clarified that the Priority Information Needs focus on fish, and Dave Sarafin said that predation effects on salmon getting to their spawning streams could be one.

Kaleb Rowland made a motion to support the Priority Information Needs developed for the Southcentral Regional Advisory Council and the Eastern Interior Regional Advisory Council and to add the Priority Information Need about studying the effects of predation as salmon move upriver. Nathan Brown seconded the motion. The motion passed by unanimous consent.

**14) Set tentative date and location of the next SRC meeting:** Kaleb Rowland made a motion to set February 12 and 13 as the primary dates and February 25 and 26 as the alternate dates. The first choice for the location is Tok, and the alternate location is Copper Center. Nathan Brown seconded the motion. The motion was adopted by unanimous consent.

## **15) Reports related to old and new business**

a) **Update on NPS final regulation regarding hunting and trapping in Alaska National Preserves:** NPS Alaska Regional Director Sarah Creachbaum gave the update and thanked the Commission for their time, understanding, and knowledge they brought to the meetings. The final rule for hunting and trapping in Alaska National Preserves was published in the Federal Register in August. The rule published was different than the one proposed. The final rule addressed two things: it prohibited bear baiting and clarified regulations regarding the use of firearms on a trap line, for example to dispatch wounded or distressed animals.

- b) **Report on recent Federal Subsistence Board actions:** Barbara Cellarius provided updates on recent Federal Subsistence Board actions. Kim Jochum from the Alaska Regional Office said the Office of Subsistence Management was looking into how to get a federal permit for the sale of brown bear hides, which is related to the deferral of WP24-01. It will be brought to the Regional Advisory Councils during their winter cycle and so will take longer for a decision.
- c) **Update regarding caribou working group:** Benjamin Pister reported that the working group met on Thursday, but since biologists had been out in the field, they will plan to meet again in the winter.
- d) **Overview of previous discussions of a durational residency requirement for subsistence eligibility:** Barbara Cellarius gave an overview of the topic, which had come up during the previous SRC meeting. At a December 1996 SRC meeting, the SRC commented that an individual should be required to live in the resident zone for one year before becoming eligible for subsistence uses in the national park, and they prepared a draft hunting plan recommendation to establish a minimum residency requirement. In October 2003, the regional director wrote letters rejecting the hunting plan recommendation based on a legal review by the solicitor's office, which concluded a durational residency requirement would be inconsistent with Congressional intent. One does need to make Alaska their primary permanent residence for a year before they can be qualified to harvest fish or wildlife under federal subsistence regulations.
- e) **Resident zone community request from Tolsona:** Cultural Anthropologist Amber Cohen presented the report on the Tolsona Community Corporation request for the addition of Tolsona to the resident zone. Park staff were preparing a written analysis regarding the long-term customary and traditional pattern of subsistence uses by Tolsona residents. A public hearing will be held on October 22 in Tolsona to take comments on Tolsona's request.
  - a. **Public Comment:** No public comments were received.

**16) Wrangell-St. Elias National Park and Preserve and NPS Alaska Regional Office staff reports**

- a) **NPS Alaska Region Subsistence Program Report:** Subsistence Analyst Kim Jochum gave the report which included a new staff member in the Alaska Native and Tribal Affairs Program. The regional office hosted five university-level Alaska Native Engineering and Science Program interns who worked in park units throughout the state. The Regional Director sent a letter to the Director of the National Park Service to request financial compensation for SRC members. This was in conjunction with the Office of Subsistence Management requesting financial compensation for the Regional Advisory Council members. There was also an open funding call for subsistence research project proposals.
- b) **Resource Stewardship and Science Report:** Team Lead for Resource Stewardship and Science Benjamin Pister gave a short report that focused on staffing changes.



- c) **Wildlife Report:** Wildlife Biologist Kyle Cutting gave the report. Wrangell-St. Elias has two caribou herds, the Mentasta herd and the Chisana herd, and they counted a low number of Mentasta caribou. The Chisana herd had calf-cow and bull-cow ratios that were above management objective for allowing a small hunt. They recently deployed 25 GPS collars, 10 on the Mentasta herd and 15 on the Chisana herd. He received funding for a project to look at historic data about herd overlap for the Mentasta, Chisana, and Nelchina caribou herds. They recently completed a large moose survey across 2 million acres from McCarthy to the Nabesna River where they recorded record low numbers of adult moose and saw very low calf production. They conducted sheep surveys in the northern Wrangell Mountains, the Mentasta Mountains, and the Nutzotin Mountains. Results will be shared in the spring. He received funding for a project to repeat sheep surveys that were done in 2011, to expand in the Chugach, the St. Elias, and Wrangell Ranges to see if they all declined in the same rate. Barbara Cellarius reported that an updated Chisana Caribou Herd Management Plan is about ready to be signed.
- d) **Fisheries Report:** Dave Sarafin gave an update to the report he provided earlier. He mentioned that the park received funding from the NPS Inventory and Monitoring Program to look into harvestable freshwater fish species. They will work with AITRC on this project.
- e) **Copper River Salmon Fisheries Research Report:** Mark Miller reported on numerous ongoing salmon fisheries research projects. The first project, in collaboration with ADF&G, involved collecting tissue samples from salmon harvested in the commercial fishery and the upriver fisheries for genetic analysis to understand stock composition of harvest. Two other projects look at environmental changes that affect in-river mortality. A fourth project is the harvest assessments of Upper Copper River communities. The final project, funded by the Inflation Reduction Act, will create a working group with collaborators from the Prince William Sound Science Center and the University of Alaska-Fairbanks to look at potential consequences of climate change on the status of Copper River sockeye salmon and their management.
- f) **Subsistence/Anthropology Report:** Cultural Anthropologist Amber Cohen reported that the park had issued an estimated 227 federal subsistence permits for hunts of caribou, goat, moose, and sheep. The park is assisting with the harvest assessments of communities in the Upper Copper River and had a data review meeting in Slana coming up. Since 2019, the park had been working with AITRC on an Ahtna Ethnographic Overview and Assessment, which is coming out later in the winter. The partner on the project on quantifying changing environmental conditions to inform decisions about means of winter access is working on an outreach product for the general public. Amber, Kyle and Barbara interviewed eight local knowledge holders about Dall sheep in Wrangell-St. Elias. The anthropology team is going to begin work on an Outer Coast Ethnographic Landscape Study.
- g) **Interpretation and Education Report:** Acting Team Lead for Interpretation and Education and Public Affairs Officer Chelsea Hernandez reported that park had 50,000 visitors in 2024. Their staff educated the public about the park and about subsistence. They also offered formal programs and had 7,000 people attend throughout the summer.

They had 2,500 local contacts in the local communities. The Education program worked closely with the Youth Conservation Corps, and out of seven members, five were kids from the local area and identify as Alaska Native. They worked in the Kennecott area for the summer. They also worked with the Ahtna Youth Interns. Interpretation staff issued about 600 federal subsistence fishing and hunting permits.

## 17) Reports from Other Organizations and Agencies

- a) **Ahtna Intertribal Resource Commission:** Regulatory Specialist and THPO Project Coordinator Deanna Kosbruk provided updates on the wildlife, ecology, fisheries, and anthropology programs along with the Indigenous Sentinels Network. Wildlife staff supported the collaring of Mentasta and Chisana caribou with flight time and equipment. Wolves will be collared in the upcoming winter. Their ecologist collected 148 samples from sockeye and Chinook salmon to analyze parasite burden and *Ichthyophonus* presence. Seventy-five cultures were sent to the ADF&G Pathology Laboratory for testing. They collected eight samples from moose in 2022, 33 in 2023, and 41 in 2024, and they did not find high mercury in the samples from 2022 and 2023. There were varying cadmium levels found. In fisheries, they conducted water temperature monitoring as part of a statewide program and collected data from 119 remote loggers from the middle of the West Fork of the Gulkana River. The fisheries biologist also helped with the installation and takedown of the Tanada Creek weir. AITRC also conducted hydroacoustic surveys for juvenile sockeye abundance in Klutina Lake. Their anthropologist worked on the harvest surveys of households in Slana, Nabesna, Mentasta Lake, Mentasta Pass, and Chistochina. AITRC was also working on a cultural preservation capacity building project with the Native Village of Chitina to catalog culturally sensitive sites. With the Indigenous Sentinel Network, their GIS specialist had been working on two apps, one on harvest and the other on sharing.

Karen Linnell added that they were working on the privacy of the sharing app, and that they wanted to understand the depth of sharing in communities.

Deanna Kosbruk concluded with the in-season teleconferences that occurred the past summer, which brought users and managers together to discuss fishing on the Copper River.

Mercedes Knighten mentioned that AITRC and the Prince William Sound College put on a salmon workshop that was an educational opportunity for the youth.

Jim Simon said that with the ecologist looking at fish health, one concern was *Ichthyophonus*, which might lead to in-river mortality.

- b) **ADF&G:** No report.

- c) **Bureau of Land Management:** Caroline Ketron, Cultural Anthropologist/Subsistence Coordinator for BLM-Glennallen Field Office provided updates on staffing changes. They issued 853 federal moose permits. In previous years, their permit numbers had hit over 1,000 as hunters who target caribou would take a moose tag, too. But with no caribou hunt, hunters were going elsewhere. Harvest reports were still coming in, but the

preliminary number was 46 moose harvested, with 1 moose harvested in subunit 13A, 31 moose in subunit 13B, 1 moose in subunit 13C, 9 moose in subunit 13D, and 4 moose in subunit 13E. They went to Delta Junction to issue permits, and participation was lower than usual.

**d) Tetlin National Wildlife Refuge:** A written report was included in the meeting book.

**18) Letter of recommendation to the Governor and Secretary:** Kaleb Rowland made a motion to send a letter to highlight the decisions of the meeting to the Governor of Alaska and the Secretary of Interior. Nathan Brown seconded.

AITRC Executive Director Karen Linnell suggested adding concern over the state Chinook fishery closure and the take of the commercial fishery to the letter. Kaleb suggested addressing this topic as a standalone letter, after action on the motion on the table.

Sue Entsminger asked for unanimous consent on the motion to send letters to the Secretary of the Interior and the Governor of Alaska highlighting decisions at the meeting, and the motion passed unanimously.

Nathan Brown made a motion to send a letter to the Governor and the Secretary to address Chinook salmon concerns, which Kaleb Rowland seconded.

Kaleb Rowland said he was concerned to learn that the restaurants and markets in Seattle receive kings and reds before the residents of the Copper Valley since the run could be in jeopardy in the future. Salmon are being caught in the commercial fishery before there are fish in the river. Mercedes Knighten added that it was a huge concern that NOAA wanted to add Chinook salmon to the list of endangered species. Kaleb Rowland added that listing Chinook salmon as an endangered species would effectively cut off other salmon fishing, because fishing nets don't differentiate among species, and said they want to protect the salmon, so they do not get put on the list. The motion passed by unanimous consent.

**19) Work session:** No work session occurred.

**20) Adjourn meeting:** Kaleb Rowland made a motion to adjourn, which Nathan Brown seconded. The motion was adopted by voice vote. The meeting adjourned at 3:46 p.m. on October 5, 2024.

*Certified for accuracy by SRC Chair Sue Entsminger  
Approved by the SRC on February 25<sup>th</sup>, 2025, Copper Center, AK*