

*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**

February 25 and 26, 2025

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

Minutes were chair certified for accuracy on April 14, 2025

- 1) **Call to order:** Sue Entsminger, the SRC chair, called the meeting to order at 9:01 A.M.
- 2) **SRC roll call and confirmation of quorum:** Present were Sue Entsminger, Suzanne McCarthy, Daryl James, Dan Stevens, Mercedes Knighten, Bruce Ervin, and Clint Marshall. Alternate: Edward GreyBear. A quorum of members was present. Kaleb Rowland arrived after the roll call, and Nathan Brown participated on the second day of the meeting only.

3) **Introduction of Commission members, staff, and guests:**

SRC members: Sue Entsminger, Suzanne McCarthy, Daryl James, Dan Stevens, Mercedes Knighten, Bruce Ervin, and Clint Marshall.

NPS staff:

AKRO: Kim Jochum, Dillon Patterson, and Eva Patton.

WRST: Joshua Scott, Benjamin Pister, Dave Sarafin, Barbara Cellarius, Amber Cohen, Heather Yates, Jonathan Schafer, Chelsea Hernandez, William Savok, Sharon Olson, Marjorie Lodwick\*<sup>1</sup>, and Russ Scribner\*.

Other state or federal agency staff: Heidi Hatcher (ADF&G-Glennallen), Todd Rinaldi (ADFG-Palmer), Caroline Ketron (BLM-Glennallen), Hannah Voorhees (OSM), and Pippa Kenner (OSM)\*.

Tribal government or tribal organization representatives: Karen Linnell (AITRC), Sterling Spilinek (AITRC), Kelsey Stanbro (AITRC), and Jim Simon (AITRC).

Members of the public: Sahara Iverson (UAF student, Fairbanks), Stephanie Carlton (Gulkana), Madison Carlton (Gulkana), Michael Rego (Nabesna), Victoria Rego (Nabesna), Kirk Wilson\* (Tolsona), Matt Warnick\* (Tolsona), Steve Waller\* (Tolsona), Don Ward\*(Tolsona), Bonnie King\* (Tolsona), Chad Church\* (Tolsona), and Don Welty\* (McCarthy).

- 4) **Housekeeping announcements:** Barbara Cellarius explained the purpose of the meeting and detailed instructions for participating in the teleconference and in-person meeting. She

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<sup>1</sup> An asterisk (\*) indicates the participant arrived after introductions.

provided guidance on participating in the public comment periods. She reviewed Robert's Rules of Order. Alaska Geographic provided the funds for light refreshments.

**5) Review and adoption of agenda:** Mercedes Knighten made a motion to adopt the agenda. Clint Marshall seconded. The agenda was adopted by unanimous consent.

**6) Review and approval of minutes from October 4-5, 2024 meeting:** Suzanne McCarthy moved to adopt the minutes as written, which was seconded by Dan Stevens. The minutes were approved by unanimous consent.

**7) Superintendent's welcome and review of the Commission purpose:** Acting Superintendent Joshua Scott 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 members 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	11/04/2027

*\* SRC members continue to serve until they are replaced or reappointed.*

**9) Election of officers:**

**a) Chair:** Amber Cohen facilitated the election for the chair. Suzanne McCarthy nominated Sue Entsminger. Mercedes Knighten closed nominations. Sue Entsminger was reelected chair by unanimous consent.

**b) Vice Chair:** Sue Entsminger facilitated the election for the vice chair. Mercedes Knighten nominated Suzanne McCarthy. Clint Marshall closed nominations. Suzanne McCarthy was reelected vice chair by unanimous consent.

**10) SRC Chair and Members' reports**

**a) SRC member reports:**

**Mercedes Knighten** was preparing for youth programs that would bring youth out to harvest resources on the lands. She mentioned a biota class that is offered with the Prince William Sound College and the Ahtna Intertribal Resource Commission (AITRC) which linked salmon and medicinal plants. She also worked with the Copper River School District to provide credits for students who attend those programs. She was preparing for the summer and hunting season. She went out ice fishing and said one could get across the land further if there were more snow.

**Dan Stevens** said he was teaching young people in Chitina how to cut fish and harvest moose.

**Daryl James** said in Yakutat, they were also teaching the next generation how to use the land and sea, and he had hoped that the rivers would not continue to drop in populations of returns.

**Suzanne McCarthy** said there has not been enough moose due to the past few years of hard winters. She urged the SRC to think about what they could do to engage young people. She wanted the youth to run these organizations, understand subsistence regulations, and get involved.

**Clint Marshall** had heard reports about the Cook Inlet fisheries and their diminishing returns as well as smaller-sized fish. He had also heard moose harvest had been light in the local area the previous year. He was concerned that Copper Basin did not go the way as other fisheries had gone. Hunting pressure from people outside of the Copper Basin was a concern. He was interested to hear the reports and looked forward to working with others on the Commission to alleviate issues.

**Bruce Ervin** reported wolves spotted in the Tok area and in Northway Village. Residents in Northway had been trapping to try and harvest wolves. There had been an increase in the last couple of years. It had been a warm winter in the Upper Tanana area. They had snow, but it had since melted. There was one week of minus 50 degrees, but otherwise the winter has been relatively warm. He heard of a few instances in Northway where people fell through the ice as they were out practicing subsistence and heard of an elder who fell through the ice on the Nabesna River. All these people were okay, but it was evidence that the environment was changing as the ice was thinner than it used to be.

- b) **Chair Report: Sue Entsminger** reported that they had more snow in Mentasta than in other places in the area, but it was still not a lot. They also had plenty of wolves. Her son, who is a pilot and a trapper, had gotten three wolves by their house and several down their road. She believed that trapping the wolves was helpful for the moose population. Her family bear baits in the spring and take around 3 to 5 grizzly bears and several black bears. She said that was also helpful for the moose. At the Eastern Interior Regional Advisory Council meeting, several people on the Council spoke about the Yukon River and how the Copper was showing signs of being like the Yukon. She had been on the Council for 24 years. The king salmon were in trouble when she got on the Council and now are worse. She said managers needed to be concerned. Suzanne McCarthy asked about things happening on the Copper that paralleled the Yukon, was it bad management? Sue Entsminger said it wasn't really management, but there were signs, adding that one concern on the Yukon is the intercept fishery in the ocean.

**SRC Chairs workshop report:** Sue Entsminger also provided a brief report on the SRC Chairs workshop and said she would like to see a meeting of just chairs instead of mostly park staff. Barbara Cellarius added that significant changes to the meeting occurred based

off feedback from the SRC from last year, including fewer park staff in attendance and a session for the chairs to talk amongst themselves. Sue asked that the written summary that Barbara had prepared be shared with the other SRC members.

**11) Superintendent's report:** Acting Superintendent Joshua Scott gave the report. Ben Bobowski was abroad as a Fulbright Global Scholar. Josh reaffirmed that subsistence remained a priority for the park. He thanked the Commission for their time and effort in making recommendations that impacted subsistence users in the area. The SRC recognition plaque was added to the Visitor Center. Mike Townsend, who had worked on this project, had passed away recently, and the park honored his contributions.

**12) Public Comments:** Barbara Cellarius introduced the public comment period. It occurred both mornings of the meeting.

**February 25<sup>th</sup>:**

**Jim Simon** reminded the Commission about ANILCA Section 801(3) in which Congress addressed that the continuation of subsistence uses of resources in public lands was threatened by an increasing population in Alaska. For the fisheries issues on the Yukon, he said there needed to be more information about how smolt in the ocean affects fisheries in the Copper River. AITRC was partnering with state and federal agencies to ensure that the Copper River populations were appropriately monitored and to learn lessons from the Yukon to avoid a similar situation on the Copper River.

**Karen Linnell**, Executive Director of AITRC, addressed the competition concerns brought up by Commissioner Marshall. There were more people moving into the Copper Basin and using the area only seasonally. ANILCA was meant to be a fix for ANCSA for tribal hunting and fishing rights, but instead it led to a dual management system. She detailed the familial and intergenerational relationships to Copper River salmon of residents in Northway, Tetlin, and Dot Lake, such as Dick Ewan, Doris Charles, and Buster Gene. She was concerned about the lack of a durational residency in the resident zone. She herself had to be invited to participate in migratory bird hunts because she lived in a community that did not have eligibility. She reminded the Commission that the Copper River could not feed the whole state, and that last year, there was a closure for Chinook for the state fisheries. She was thankful that federal fisheries did not close but predicted more state users might try for federal permits. She mentioned low harvest for moose and higher dependence on moose and caribou when salmon numbers are down. The Board of Fisheries approved delaying the commercial industry by a week and changed the personal use fishery by three days and disallowed the retention of kings until June 30. She hoped it would help with getting more salmon to the headwaters. She said they needed to monitor and be aware of increased pressure on resources.

**February 26:**

**Karen Linnell** suggested revisiting the list of research and monitoring priorities that the SRC had worked on. The research priorities would strengthen understanding of the land to better inform management. Wrangell-St. Elias is the largest national park and is severely underfunded, as well as had only one fisheries biologist and one wildlife biologist. It was difficult for staff to do monitoring and pursue funding. Barbara Cellarius said the list of

research priorities had been added to the subsistence management plan as an appendix, and Amber Cohen said a list of management priorities was adopted by the SRC at its September 2023 meeting.

## **Action Items:**

### **13) Old Business Action Items**

#### **a) ANILCA Section 804 user prioritization analysis**

**Introduction:** Amber Cohen explained that at the October 2024 meeting, the Commission heard the analysis for and discussed WP25-01, which was the ANILCA Section 804 user prioritization analysis for Nelchina caribou in Units 11, 12 remainder, and 13. The SRC voted to create a working group to further review the 804 analysis. The working group members were Mercedes Knighten, Nathan Brown, Bruce Ervin, and Dan Stevens. The FSB did adopt the proposal, so if the SRC wants to recommend any changes, they could submit a wildlife proposal.

- i) **Report from working group:** Mercedes Knighten gave the working group report. The following changes were recommended:
- Add Healy Lake to the Unit 12 remainder determination to match Dot Lake, because many people go back and forth between the two.
  - Add Gulkana to the Unit 13C determination as recommended by EIRAC and SCRAC.
  - There was no objection to adding Gakona to Unit 13A and Chistochina to Unit 12 remainder determination as suggested by the RACs.
  - Add Mentasta Lake to the Unit 12 remainder determination as recommended by EIRAC and SCRAC because Mentasta Lake residents are closely related to other people who have prioritization for Unit 12 remainder.
  - Add Mentasta Pass to Unit 11 N of Sanford River determination to match Mentasta Lake because they are both prioritized for Unit 13C, right next to Unit 11.
  - Add Nabesna Road to the Unit 13B determination to match Slana.
  - Add McCarthy Road to the Unit 13B determination to match McCarthy and Chitina, between which the McCarthy Road residents live.
  - Add Kenny Lake/Willow Lake and Tonsina to the Unit 13A determination to match nearby communities.

It was also recommended to submit a Unit 13C caribou C&T proposal for Northway, Tetlin, Tanacross, and Tok.

- ii) **Opportunity for public input:** No public comment.

- iii) **SRC discussion and recommendation:** Barbara Cellarius reminded the SRC about the ANILCA Section 804 user prioritization process. The prioritization narrowed down broader C&T use determinations to a more focused eligibility based on dependency to the resource.

Sue Entsminger asked how the Commission felt about waiting to decide on the 804 analysis. Mercedes Knighten said she would be okay to wait. Clint Marshall, Dan Stevens, and Kaleb Rowland also agreed to wait. Barbara Cellarius reminded the SRC

that the Federal Subsistence Board had adopted the 804 and so, it was in place. Mercedes Knighten said it was fine to wait a year for the working group to meet again. Sue Entsminger recommended staff go over the ANILCA 804 with SRC members before that future meeting.

There was discussion on whether to submit the Unit 13C caribou C&T proposal that the working group recommended. Bruce Ervin made a motion recognize Northway, Tetlin, Tanacross, and Tok for customary and traditional use of caribou in Unit 13C, which Kaleb Rowland seconded. After asking about more information about the existing C&Ts and why those communities were not included, Bruce Ervin said it was not urgent to submit a proposal at this time. Bruce Ervin withdrew his motion, with the concurrence Kaleb Rowland, who had seconded the motion.

**b) WP24-01 Statewide sale of brown bear hides**

**i) Introduction:** Pippa Kenner, OSM Anthropologist, introduced the proposal. This proposal was submitted by a resident of McCarthy to allow the sale of brown bear hides under subsistence regulations. Subsistence users must salvage the hide, however, the hides must not be sold. The proponent said that hides of other legally harvested species could be sold and so, brown bears should be added to that list. The proposal had been deferred twice by the Federal Subsistence Board, first in 2024, and then in February 2025. It was deferred a second time to provide an opportunity for the RACs to provide recommendation on the analysis addendum, including whether sales are culturally appropriate in their regions, during their winter meetings. The revised OSM conclusion was to support the proposal with the modification that the hides of brown bears with or without claws attached may be purchased in the U.S. for personal use and not to be resold under an OSM customary trade permit. Additionally, the modified regulations align sealing regulations with the State of Alaska sealing regulations. This modification allowing for domestic purchases aligned with the Convention on International Trade in Endangered Species (CITES). The sales under federal regulations would be considered customary trade.

**ii) Opportunity for public comment**

Karen Linnell, Executive Director of AITRC, said that there had always been customary trade of resources. They traded salmon for seal oil and copper for cedar. She did not see this as different from that trade. The use of big animals for handicrafts was a traditional practice for centuries.

**iii) SRC discussion and recommendation:** Kaleb Rowland made a motion to support WP24-01 as modified by OSM to allow for the sale of brown bear hides. Suzanne McCarthy seconded. Kaleb Rowland had originally put the proposal in and though it had gotten into the weeds of bureaucracy. He appreciated the OSM modification to allow for sale in areas with either a 1 or 2 brown bear harvest limit. It was important to be able to sell because these hides were used for making handicrafts. He doesn't make handicrafts himself, but he could sell a hide to someone who does. He had given hides away in the past to someone who makes handicrafts. The motion passed by unanimous consent.

#### 14) New business actions

- a) **Nabesna Mine cleanup subsistence concerns:** Benjamin Pister summarized the situation at the Nabesna Mine. The spill at the Nabesna Mine occurred sometime in the 1950s to 1960s. The tailings contain levels of arsenic, lead, and other toxins. He asked the SRC three questions: 1) Which subsistence activities should the National Park Service keep in mind? 2) Besides sheep hunting, moose hunting, and berry picking, what other activities should the Park Service be aware of? And 3) Are there staging areas that should be avoided?

Suzanne McCarthy asked about land status, and Benjamin Pister said the spill was 70% on park lands but the origin was on private lands. He said that work would not start until close to 2030. Sue Entsminger said grouse and ptarmigan hunting were subsistence activities to be aware of on the road, and that they usually occurred in the fall. She asked how many trucks would be needed. Benjamin Pister said it depended on which alternative the NPS chose. They were looking at 2,000 dump truck loads if the tailings are removed. Sue Entsminger said winter travel would be easier on a dirt road. Suzanne McCarthy asked about the process to truck the toxic soil out, and Benjamin Pister said it would have to be trucked to Valdez, shipped to Seattle, and then put on a train to a facility in Oregon. Clint Marshall said if there was a road closure, it might impact people who ice fish in the winter for trout and burbot. Suzanne McCarthy asked if there had been any documented impacts to wildlife near the mine, and Benjamin Pister said they were worried about toxins getting into the water table and that some impact had occurred in Cabin Creek.

i) **Public comment:**

Michael Rego of Nabesna said that one consideration for winter trucking was that the Nelchina caribou herd wintered in the area. Their neighbors already had run-ins with caribou on the road. Grouse and ptarmigan were also often on the road as well.

Karen Linnell, Executive Director of AITRC, said the Nabesna Road was very narrow and that it could cause traffic issues for those who want to go ice fishing. The road would need significant improvement. If it was in the summer, it would impact people who have a fish wheel in Slana and in Batzulnetas. Additional traffic and potential accidents were concerns.

Kaleb Rowland said the park should consider planning the construction in such a way that the road would be closed for a certain period of time when there is less use to allow trucks to get in and out. The time would be advertised so local community members could plan around the closures.

b) **Timely wildlife updates**

- i) **Wrangell-St. Elias:** Benjamin Pister gave the wildlife updates. The Chisana caribou surveys showed good calf production. The Mentasta herd survey conducted in June and July showed there were 189 animals in the herd and 28 of those were collared. A project in 2026 will look at the overlap of the Nelchina, Mentasta, and Chisana caribou herds. The park conducted sheep surveys last summer which counted 933 adults and documented a slight increase in lamb production. An upcoming project will look at sheep declines for factors affecting sheep abundance. There was not a

moose survey in 2024 but there was a documented decline in population in 2023. Sue Entsminger asked if there was a change in how the Mentasta caribou were counted, and Benjamin Pister said he did not think so but would confirm with Kyle Cutting.

- ii) **Bureau of Land Management:** Caroline Ketron gave the report which detailed federal subsistence permitting for moose. The Federal Subsistence Board closed moose hunting to state hunters in some subunits of Unit 13 and the BLM let hunters know as they were permitting. Wildlife proposal 25-01 changed the caribou hunts to may-be-announced seasons so they remained closed unless federal managers opened them. For the 2024 moose season, BLM issued 853 federal moose and designated hunter permits. They went up to Delta Junction to issue permits. Hunters must get their permits in person, demonstrate Alaska and rural residency, and have a valid Alaska state hunting license. Online reporting was not available last season, but they had over 90% of harvest reports returned for moose hunts. The federal harvest for Unit 13 was 46 moose, and the success rate was around 11%. She thanked the SRC for taking a close look at the ANILCA section 804 analysis and said BLM might put in a proposal to tweak the delegation of authority language.
- iii) **ADFG:** Heidi Hatcher, Glennallen Area Wildlife Biologist, provided the report. She said the office had gone through turnover and had been short staffed since July. They will be fully staffed by March. Last year, there were 13 Nelchina caribou calves per 100 cows. This summer, there were 46 calves per 100 cows. In the fall survey, there were 41 calves per 100 cows, and 26 bulls per 100 cows. The 4-month-old calves were larger than in 2015. The fall population estimate was around 12,000 animals. Due to the low herd size, there will be no state hunts for the next year. The caribou wintered from Gunsight Mountain to the Tetlin Flats, and survival was looking better than last year. As far as moose went, in Unit 13, the counts were up in every subunit except Unit 13C. Wolf control was also active in Unit 13. In Unit 11, there was a slow decline in moose abundance due to low calf-cow ratios. Bull-cow ratios were still high. Harvest was up in all subunits of Unit 13. In Unit 11, there were 40 rams sealed. Sheep surveys in the Wrangells were on the schedule for every other year.

**c) Call for proposals to change federal subsistence wildlife regulations**

- **Introduction:** Barbara introduced the call for proposals to change federal subsistence wildlife regulations. Proposal deadline is April 4. She reminded the Commission they had submitted a special action request before to extend the fall moose season in Unit 12, and if they wanted it to be permanent, they would need to submit a proposal.
- **Opportunity for public comment:**  
Michael Rego of Nabesna suggested a proposal that would close Unit 13C lands to non-federally qualified subsistence users for moose. With the Nelchina caribou hunt closed, more hunters targeted moose, and there was an increase in the Nabesna area.

Karen Linnell, Executive Director of AITRC, agreed about closing federal lands to non-federally qualified users due to the high traffic from folks from all over the state. She also questioned why state users could hunt on federal lands but not the other way around. ANILCA Title VIII allowed for a rural priority. There was too



much competition in the Copper Valley. August has become too warm for moose to move into federal lands. Due to the low salmon returns, the dependence on moose and caribou have become more important.

Stephanie Carlton of Gulkana said she wondered about a proposal that would extend the moose season past September 20 due to concerns about August moose hunts. Suzanne McCarthy said everyone noted that the seasons have shifted.

Jim Simon said he remembered 40 years ago, it was too hot to hang meat in August, and now 40 years later, the perception still remained that the federal priority was an earlier season. He said it was inconsistent with good C&T patterns of use. The Commission might consider putting in or supporting a proposal on changing the season.

Kaleb Rowland said he would oppose to closing federal lands to non-federally qualified users because there were some state regulations that federal subsistence users followed, such as on national preserve lands, one could harvest a grizzly bear and not salvage the meat.

- **SRC discussion and recommendation:** No proposals were developed.

**d) Call for proposals to Alaska Boards of Fisheries and Game:** No proposals were developed.

**e) Tolsona Resident Zone Request**

- i) **Presentation of the analysis:** Amber Cohen, cultural anthropologist, and Dillon Patterson, cultural anthropologist at the NPS Alaska Region Office, presented on the analysis of the Tolsona resident zone request. They covered the pertinent regulations, the history of the resident zone, and the history of previous requests that came from Tolsona. They detailed the history of Tolsona, the population data, and the customary and traditional use of the national park. They reminded the Commission to consider whether a significant concentration of Tolsona residents customarily and traditionally engaged in subsistence uses in Wrangell-St. Elias National Park.

Suzanne McCarthy asked about individual use, and Amber Cohen responded that Tolsona residents had stopped using the park when it was created and when aircraft were prohibited for subsistence in the national park. Sue Entsminger asked about aircraft exemptions for subsistence, and Dillon Patterson responded those were for Yakutat and Anaktuvuk Pass. Suzanne McCarthy asked why the park went with 42 for the Tolsona population, and Amber Cohen said it was the number of residents in the Tolsona Community Corporation-defined boundaries for the community. Suzanne McCarthy said Tolsona had changed from a couple of cabins to a community but wondered about the low population and whether it was part of the Glennallen area. She said the spirit of ANILCA was the cultural basis of subsistence. Amber Cohen said to get to the community history, they had to gather the individual histories. Dan Stevens asked about how they accessed the park without airplanes. Amber Cohen said generally by off-road vehicles, highway vehicles, and walking. Dan Stevens said

when he was growing up, he did not remember many houses in Tolsona and that the lodge was not open in the winter. Amber Cohen said it was a sparsely populated area, and that some people identified with where they lived on the highway or with Glennallen. At the time of ANILCA, for people outside of a resident zone community, they could apply for a 13.440 permit. Park records showed people in Valdez and Slana had applied for those. Then-SRC chair John Vale had also recommended to the Tolsona Community Corporation president in 1999 that Tolsona residents apply for the 13.440 permits. Mercedes Knighten asked if Tolsona was not added to the resident zone, they could apply for the 13.440 permit, which Amber Cohen confirmed. Barbara Cellarius said there would be similar eligibility criteria – a customary and traditional pattern of use in the national park.

## **ii) Opportunity for public input**

Don Ward of Tolsona explained the disparity in community boundaries and population numbers. The Census and the Department of Labor used a different boundary than the Tolsona Community Corporation, and so, there were people not counted by the Mendeltna nor the Glennallen community organizations. More people had moved into the community in the last few years. He said that the population would be 44 or 45 by now. He also questioned why airplane access was not allowed. He said people did not go into the park without airplanes. He first moved to Tolsona in 1976 and met the Zimbicki brothers who had accessed the park without airplanes. They were there as early as the 1940s. They trapped a good part of the Copper Basin by dog team before changing to snowmachines. He knew them for 20 years before they died. He said he hunted in the park and got permits from the park. He had not had an issue before and was confused why it was one now. He asked what good a boundary was for a community if no one recognized it.

Daryl James asked whether Tolsona was a city or a community per the articles of incorporation. Don Ward said a community. Daryl James asked why there were discrepancies with the boundaries if it was listed as a community with the State of Alaska. Suzanne McCarthy explained the corporation was a legal entity that could receive funds on behalf of community members. Don Ward said it was for grants to maintain the cemetery, the landfill, and the fire hall facility. Kaleb Rowland said he understood because McCarthy was set up the same way.

Bonnie King of Tolsona said she and her husband moved there in May 2019 and had difficulties with the U.S. Census; they had not received documents, and the Census said their address was not recognized. They would be two people included in the 42-population number. Kaleb Rowland asked about her hunting history in Tolsona and in the park. Bonnie King said they went to Nabesna Road to sight-see and to scout hunting locations, but they found out they could not get a permit, so they haven't hunted in Wrangell-St. Elias. They hunted moose, caribou, and birds. They fished at Tolsona Mountain Lake.

Matt Warnick of Tolsona thanked the SRC for being a welcoming group. He said the analysis that had been done by NPS, plus the ones by OSM and Tolsona residents,

were an amazing amount of work. When he first started working on the C&T fisheries proposals, he was hesitant that Tolsona would not get a fair shake. He was overall pleased by the work the NPS and OSM had done, and that they did a fair job with the proposals and the analysis. He specifically thanked Amber Cohen for her work. The SRC had supported the salmon C&T proposal, and he had thought it was a settled decision. He learned about the RACs and the FSB. He heard lies during the meeting which ignored the written testimony and support. The RACs and FSB made their decision based on not wanting others to use the resource. Tolsona is a small, diverse, and inclusive community. In the 1940s and '50s, it was three homesteads and a lodge. Sue Entsminger asked about the lies, and Matt Warnick said they mischaracterized Tolsona and their subsistence use. She asked him how long he lived in Tolsona, and he said over 10 years, and he hunted in the park for 4 years. She asked if he ever received a subsistence hunting permit from the park, to which he replied yes. Dan Stevens asked about the lodge and whether it was open in the winter. Matt Warnick said he heard from other community members that it was an operating lodge. Clare Jaeger was born there, and her father built that lodge.

Karen Linnell, Executive Director of AITRC, said her organization represented tribal nations with over 9,000 years of history in the land and over 200 generations of passing down knowledge from one generation to the next. She commented on the family history of one of the residents who was used in the analysis and that the C&T history came from Tazlina. She did not believe the long-term and consistent use in the park and passing down of knowledge had been met. She went to school with several residents mentioned who had since moved away. Subsistence users went close to home. Ahtna people had been nomadic and had differing winter places. Philip Sabon hunted at the base of Mt. Drum. Ray Stickwan would go with him. The St. Amand family also went across the river by boat. There had been a lot of change in the communities. Two years of use in a resident zone community and then moving to another area was not C&T use. She supported individuals with a long-term pattern of use using the 13.440 process. She mentioned she was not eligible for some subsistence activities because she moved. For example, her father was from Chistochina which has C&T for Chisana caribou, but because she lived in Glennallen, she would need to apply for an individual C&T. She said it was important to use their federal rights to protect and hunt in their traditional homelands. Her father's trap line went from Boulder Creek to Mount Sanford. Her fish camp was on her grandfather's land in Chistochina. She said they had to go back to where their roots were. She did not see a long-term, consistent pattern of use. Individuals who qualified could apply for the 13.440 permit. Long-term residents of Tolsona were not in support, and there were moose in their backyard.

Dan Stevens said his grandfather used to cross the Copper River in a raft. Karen Linnell said her father and grandfather had horses and built rafts to cross, too. Knowing how and when to cross the Copper River was something they talked about often. She mentioned that the Chitina Dipnetters Association used Horse Creek Mary's photo of her dipnetting, but that was not their history. It was the Ahtna peoples' history. She said they support their neighbors but there was not enough to go around. Sue Entsminger said she respected the Native people in the area and how they

worked together, and that non-Natives became part of the community. That was how she wanted things to be: all working together.

Kirk Wilson of Tolsona served on the Fish and Game Advisory Committee, the PWSAC board, and on the SCRAC. He wanted to restore and preserve the Ahtna culture and stand up for all qualified subsistence users. He said there were 11 people around Tolsona Lake. He had lived there for 45 years. He knew everyone who was in the area, had hunted with those people, and cut meat with people, all right in the Tolsona community. One had a hunting location on Fish Lake and the other Crosswind Lake. They went in their backyard. Kirk Wilson had hunted in the park with an airplane before the park was established. After ANILCA, he quit commercially using that area like his other neighbors. They were guides. There were 14 residents around the lake now. One Native person and the rest old-time residents. They were not included in this process. He said he never seen his neighbors subsist in the park. People who left want to come back, but they hadn't been here. He said it would be a tragedy to encroach on the lands of the Ahtna people. He called the request sport hunting.

- iii) **SRC discussion and recommendation:** Suzanne McCarthy made a motion to support adding Tolsona to the Wrangell-St. Elias National Park resident zone. Kaleb Rowland seconded.

Mercedes Knighten said C&T use was about generations of use on the land. Her family came from across the river, and they were impacted by laws such as ANCSA and ANILCA. She appreciated the Ahtna place names mentioned in the analysis, but it was not the history of those who live in Tolsona now. She said the Homesteaders Act prevented Native people from accessing lands. She said those who moved into Tolsona and wanted access to the resources had other opportunities to hunt and fish in other areas. The acreage in discussion in the national park was minimal compared to Units 12 and 13. She did not support adding Tolsona to the resident zone and recommended they do the 13.440 process to show a use of the national park that spanned generations.

Dan Stevens said though he was from Chitina, it had been a town, and the Ahtna people had 8 villages along the Copper River. They were on every single creek and river in what was now Wrangell-St. Elias.

Kaleb Rowland said it was possible that homesteaders had been in and out of the park. People used to cross the Copper River often, either by raft or in the wintertime. It was possible that people in Tolsona hunted in the park. The federal government divided users and told them where they could or could not go. There were older people who had a history of using the park, and that was part of Tolsona's history. People moved, died, and moved in, but people who moved in were not any less part of the community than people who moved out.

Clint Marshall thanked staff and the public. He said Tolsona residents had not been involved with customary and traditional subsistence use in the national park. He said

they had to focus on current residents, not ones who used to live there and no longer did. As someone who lived in the area, he was concerned about competition and how far the resident zone would extend. He was not protected from hunting pressure like a resident of McCarthy or Chistochina would be. He was thankful for the park and the preservation it provided and called it a sanctuary. His family came from the Chitina area and had lived there for generations. He did not support adding Tolsona to the resident zone, based on lack of evidence for customarily and traditionally engaging in subsistence uses in the national park.

Daryl James said he appreciated the discussion. He asked what the definition was of significant concentrations and customary and traditional—how far back was customary and how far back was traditional. He was concerned about non-residents taking more resources than residents, which he saw in the national forest. He also questioned what the definition of resident was as it differed between agencies.

Suzanne McCarthy said Tolsona had been considered part of Glennallen which was why it wasn't named in the late 1970s. She said resident zones were designated for the customary and traditional subsistence use of the community, not the individuals who live there. She understood the concern about people coming out to build recreation cabins but said that was an enforcement issue. It was not a reason to say their neighbors could not have the traditional uses in the national park. She did not like pitting neighbor against neighbor. She repeated that competition and illegal use were enforcement issues. This was a small, select group that was qualified to hunt in the national park. There was concern in the past that Wrangell-St. Elias would become the next Denali but instead, they were losing population numbers. The job of the SRC was to represent their neighbors and use their voice, given in ANILCA, to provide input to federal laws and regulations.

Bruce Ervin said this was a tough topic and he understood both sides. He had to think about the animal relatives and that sometimes, there had to be sacrifice because they sacrificed themselves, too. He was thinking about the traditional ecological knowledge which came from thousands of years of experience. He was considering the future. He did not take the decision lightly, but he also did not support adding Tolsona to the resident zone.

Kaleb Rowland said that Tolsona residents could not establish a history of the use in the national park because it was illegal for them to hunt in the park. It would have had to have been residents who hunted before 1980. The park was also the hardest part of the NPS lands to access. Sue Entsminger asked if the C&T use had to meet all eight criteria, and Amber Cohen said no, it was not a checklist.

Sue Entsminger said it was difficult for her, as ANILCA protected non-Native and Native subsistence. She asked if any Tolsona resident was given a 13.440 permit, and Barbara Cellarius said no. Sue Entsminger asked if any federal hunting permits had been given to Tolsona residents, and Barbara Cellarius said yes, explaining that for some species Tolsona residents are eligible for permits under federal subsistence regulations, but are only eligible to use the permits on lands designated as national

preserve. Sue Entsminger reiterated she was torn as she had been around since President Carter established Wrangell-St. Elias National Monument. Local residents had fought hard for subsistence rights. She had a deep respect for the Native people of the area and also understood where Tolsona residents came from. She said it was hard for her to add a community where residents had not been around prior to the 1980s.

Sue Entsminger asked for a roll-call vote. The motion failed by a vote of 2 for, 5 against, and 1 abstain.

- 15) Set tentative date and location of the next SRC meeting:** Kaleb Rowland made a motion to set September 25 and 26, 2025, as the primary dates and October 2 and 3, 2025, as the alternate dates. The location is Tok. Suzanne McCarthy seconded. The motion passed by unanimous consent.

## **Reports:**

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

- a) **Report on recent Federal Subsistence Board actions:** Barbara Cellarius provided updates on recent Federal Subsistence Board actions, focusing on proposals on which the SRC had commented.
- b) **Report on Alaska Board of Fisheries actions at Prince William Sound and Southeast/Yakutat Meetings:** Dave Sarafin gave the update for the Board of Fisheries, which met in Cordova in December 2024. Proposals 51, 52, and 53 were amended via a record copy during the meeting. The concern was with Chinook runs throughout the state. The board wanted to take action on the Copper River. They revised the Copper River salmon management plan to say that the commercial fishery may open after May 21, instead of May 15<sup>th</sup>. Taking of a king salmon in the Chitina Personal Use fishery was prohibited until July 1<sup>st</sup>, and their opener was delayed. Sue Entsminger asked about chart plotters and if people needed them for safety. Dave Sarafin said it helped for depth when navigating the river.
- c) **Report on Alaska Board of Game actions at Central and Southwest Region meeting:** Amber Cohen provided the update on the Board of Game actions at their recent Central and Southwest Region meeting, focusing on proposals on which the SRC had provided comments. She also provided the outcome for two sheep proposals in Unit 11.
- d) **Update regarding caribou working group:** Benjamin Pister gave a short update. It had not met since the fall SRC meeting. It was determined at the last meeting that wildlife biologists needed to come, and scheduling a meeting around their field schedule was the goal. Due to FACA regulation changes, AITRC would take the lead in organizing the working group in the future, and it would no longer be under the SRC. A meeting would be scheduled soon.
- e) **Update on subsistence timber harvest policy and use of small bridges for subsistence access:** Barbara Cellarius gave the update. The park superintendent wanted to review options with the NPS fire management officer, and so, no changes were proposed for the 2025 Compendium. Sue Entsminger asked what someone who wanted to use small bridges would do if it was not being listed in the Compendium. Barbara Cellarius said they could contact the park and there might be options. Kaleb Rowland said he was approached in McCarthy by residents with frustration to the log harvest policy, and in

particular, about standing dead trees, and Barbara Cellarius said that was what they were working with the fire management officer on.

#### **17) 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. The regional director, Sarah Creachbaum, was retiring, and David Alberg would be acting. Associate Regional Director Grant Hilderbrand transitioned to a different position; Dr. Elizabeth Bella was acting in his position. UAF graduate student Sahara Iverson was working on a project in relation to the changing salmon availability has changed food security. Sue Entsminger asked who would decide Sarah's replacement, and Kim Jochum said the national office would decide.
- b) Resource Stewardship and Science Report:** Team Lead for Resource Stewardship and Science Benjamin Pister gave a short report that focused on staffing changes. The ecologist position was still vacant. Two projects were under review for internal funding. One focused on predation levels on salmon in the Copper River by bald eagles which came from a research priority of the SRC. The second project was to map in fine-scale the permafrost along the Nabesna Road corridor to use for trail maintenance. Suzanne McCarthy asked if that included coring samples, and Benjamin Pister said it was a field intensive effort.
- c) Wildlife Report:** Benjamin Pister gave the report as wildlife biologist Kyle Cutting was at a training. 189 adult caribou in the Mentasta herd were estimated during a June survey. The calf to 100 cow ratio was similar to the previous 4 surveys since 2017, while the bull to 100 cow ratio was lower than in 2024. 28 GPS collars existed on the herd. A composition survey on the Chisana caribou herd was done in 2024 and indicated high calf production and survival of bulls. For moose, the estimated population observed in 2023 was at a record low and the park was exploring the role of record snow amounts in moose declines. Sheep surveys were conducted across the northern Wrangell Mountains including the Nabesna area, the Mentasta Mountains, and the Nutzotin Mountain. The results indicated a slowing in the decline of adult sheep, and lamb production increased slightly over the record low of 2023. A project scheduled from 2025 to 2027 aimed to evaluate factors that contributed to the recent sheep declines. In 2025, the NPS will resurvey the long-term monitoring area to evaluate recovery and expand surveys to the southern side of the Wrangell Mountains. Both projects planned for hiring another wildlife biologist to assist.
- d) Fisheries Report:** Fisheries biologist Dave Sarafin gave key updates from the fisheries report. The Tanada Creek weir documented the passage of 14,704 sockeye salmon and 13 Chinook salmon. They generally do not count many Chinook salmon except for one year when the count was 138. The park was working on a cooperative agreement with AITRC to manage the weir. They were also scheduled to work with AITRC on an inventory and monitoring project of freshwater fish in the waters of the park and the preserve. The Copper River salmon run last season was slow to start and then increased in strength as the season progressed. Federal harvest opportunities remained open. The sockeye salmon sustainable escapement goal was achieved, but the Chinook salmon in-river run assessment indicated it might not have met the minimum bound of the sustainable escapement goal of 21,000 to 31,000 Chinook salmon. Upper Copper River Federal subsistence fishery permits issued were 202 Chitina Subdistrict, 293 Glennallen

Subdistrict, and 2 Batzulnetas permits. The forecast for the 2025 Copper River total run returns were 2,638,000 for sockeye salmon (50% above the 10-year average) and 36,000 Chinook salmon (25% below the 10-year average). Suzanne McCarthy asked about the Lower Copper River fishery. Sue Entsminger asked about the total harvest for that fishery, which was 425 fish based off in-season reporting. Sue Entsminger asked about the Chinook salmon not meeting the sustainable escapement goal. Dave Sarafin said there was some uncertainty around the numbers due to a low sample size and high error in the data.

- e) **Subsistence/anthropology report:** Cultural Anthropologist Amber Cohen gave the report. Wrangell-St. Elias and Tetlin National Wildlife Refuge staff issued 230 federal subsistence hunting permits for moose, goat, and sheep for Wrangell-St. Elias lands in Units 11 and 12; the most frequently issued permit was for the fall moose hunt in Unit 11 remainder. For the joint state/federal moose permit RM291, in portions of Units 11 and 12, 274 permits were issued, 162 people hunted (90 federally qualified subsistence users) and 14 moose were harvest. Only a few harvest reports remained to be returned. The Ahtna Ethnographic Overview and Assessment (EOA) was now available online. The Upper Copper River harvest assessment technical paper will come out some time in the fall of 2025. The Dall sheep local knowledge interview project had begun the data compilation process and planning for a product. The Outer Coast Ethnographic Landscape Study began this fiscal year and involves collaborating with Native Village of Eyak and Yakutat Tlingit Tribe for documenting important coastal resources along the park's coastline as a baseline document for park management.
- f) **Interpretation and Education report:** Acting Team Lead for Interpretation and Education and Public Affairs Officer Chelsea Hernandez gave the report. Winter Fun Day was held in December and had over 109 participants. They were planning for Chosen Frozen events. They were recruiting for the Youth Conservation Corps. There will be summer operations, and the park will recruit locally for seasonal employees for the summer. The report is along the lines of uncertainty—we are running a couple of youth programs.

## 18) Reports from other organizations and agencies

- a) **Ahtna Intertribal Resource Commission:** Ecologist Kelsey Stanbro gave the report where she highlighted 3 key projects. There were 9 wolves that were captured and collared back in November, with additional capture events occurring in March. Thirteen carcasses were also received from trappers for comprehensive sampling to look at long-term diet patterns and shifts in prey consumption. The health of wolves was connected to the overall stability of the ecosystem. The moose health project found that there were no high mercury levels in 2022 and 2023, and the issue was deficiency rather than excess. There were low copper levels. There was a range of cadmium that depended on the age of the moose. There were 41 moose sampled in 2024. A comprehensive report will come out in 2026. AITRC was also in transition to manage Tanada Creek weir and to add new technology for managing the weir. They also added an education outreach coordinator, a tribal stewardship coordinator, and a geologist. A stream restoration biologist was coming in April. Sue Entsminger asked about the wolf research. Karen Linnell reiterated



the project was to look at range, distribution, and diet, and that it would be a while for results.

- b) **ADF&G:** No fisheries report was provided. Wildlife report was provided during key wildlife updates.
- c) **Bureau of Land Management:** Report was provided during key wildlife updates.
- d) **Sahara Iverson, UAF Graduate Student:** Sahara Iverson introduced her project that looked at changing salmon harvests. She was looking through harvest assessments, SRC minutes, and RAC transcripts to find a pattern and trend in the data to illustrate changes in subsistence use. She hoped to overlay this with patterns and trends in the commercial industry. Suzanne McCarthy asked if she was going to conduct surveys and interviews and that she would be happy to connect her with people. Sahara Iverson said there was a lot of data out there to comb through. Sue Entsminger said to reach out to the users. There was less harvest as more sharing was going on, especially for older users. Dan Stevens said Sahara was welcome to talk to him, too.

**19) Letter of recommendation to the Governor and Secretary:** Kaleb Rowland made a motion to write a letter to the new Secretary of Interior, and to copy the Governor, that would introduce the SRC, the purpose, and the accomplishments, including research priorities, the outcome of the Tolsona resident zone request, support for the brown bear hide sale proposal, and the log harvest policy recommendations. Suzanne McCarthy seconded. She also said to add information about the low Chinook salmon runs. Sue Entsminger said to add the situation on the Yukon and the similarities to the Copper River as well as support for the NPS project on bald eagle predation. This research on wildlife populations helps all users. She also wanted to add concern about sheep populations. Suzanne McCarthy wanted information on the Nelchina caribou herd's decline added. The motion passed by unanimous consent.

**20) Work session:** Barbara Cellarius mentioned the list of research priorities. Suzanne McCarthy said the seasons for subsistence moose hunting did not align with the weather conditions in August. Sue Entsminger said she would like managers to think about *M.ovi* and Dall sheep. Sheep research and concerns could be taken up at the next meeting. Barbara Cellarius said reviewing the research priorities could be an agenda topic for the fall meeting. Sue Entsminger asked Sterling Spilinek of AITRC to describe the sheep funding he was putting in for to look at sheep in Wrangell-St. Elias, the Tok Management Area, and the Thompson Pass Area. It would be a long-term study over five years to look at capture, collars, recruitment, disease, vegetation, environmental monitoring, snow and ice conditions, and predation by eagles. Benjamin Pister said it was important to describe how Alaska was different to leaders in D.C. Sue Entsminger said ANILCA also had a provision on wildlife for sightseeing and sport hunting, and that was important in Alaska.

**21) Adjourn meeting:** Kaleb Rowland made a motion to adjourn which Suzanne McCarthy seconded. The motion passed by unanimous consent. The meeting adjourned at 11:10 AM on February 26, 2025.