

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 27th and 28th, 2026

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

Minutes were chair certified for accuracy on April 15, 2026.

- 1) **Call to order:** Sue Entsminger, the SRC chair, called the meeting to order at 9:10 A.M.
- 2) **SRC roll call and confirmation of quorum:** Present were Sue Entsminger, Bruce Ervin, Mercedes Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Dan Stevens.
- 3) **Introduction of Commission members, staff, and guests:**
SRC members: Sue Entsminger, Suzanne McCarthy*¹, Dan Stevens, Mercedes Knighten, Bruce Ervin*, Kaleb Rowland, and Clint Marshall**².

NPS staff:

AKRO: Eva Patton, Gavin DeMali

WRST: Joshua Scott, Amber Cohen, Chelsea Hernandez, Jesse Heinbaugh, Hope Courtney, Sharon Olson, Crystal Souza, Kyle Cutting*

Other state or federal agency staff: Caroline Ketron (BLM-Glennallen), Tracy Hansen (ADFG-Glennallen), Scott Maclean (ADFG-Glennallen), Brooke McDavid* (OSM), Hannah Voorhees* (OSM), Sara Taylor* (DOI)

Tribal government or tribal organization representatives: Sterling Spilinek (AITRC), Deanna Kosbruk (AITRC), Kathryn Martin* (Ahtna, Inc), Matt Piche* (Native Village of Eyak), Alissa Perez* (Healy Lake Village)

Members of the public: Sahara Iverson (UAF student, Fairbanks), Pete Rand* (Prince William Sound Science Center), Dave Sarafin (Tazlina), Barbara Cellarius (Copper Center), Don Welty* (McCarthy)

- 4) **Housekeeping announcements:** Amber Cohen explained the purpose of the meeting and detailed instructions for participating in the meeting and during public comment periods. She reviewed Robert's Rules of Order. Alaska Geographic provided funds for light refreshments.

¹ * indicates online participation via Teams or teleconference for the whole meeting

² ** indicates online participation via Teams or teleconference on February 28 only

- 5) **Review and adoption of agenda:** Clint Marshall moved to adopt the amended agenda. Kaleb Rowland seconded. The amended agenda was adopted by unanimous consent.
- 6) **Review and approval of minutes from September 25-26, 2025, and February 3rd, 2026, meetings:** Clint Marshall moved to adopt both minutes as written which Kaleb Rowland seconded. 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	12/01/2027
VACANT		Governor	
Mercedes Starr Knighten	Glennallen	Southcentral RAC	11/04/2026
VACANT	Yakutat	Southeast RAC	10/27/2025
Sue Entsminger	Mentasta Pass	Eastern Interior RAC	11/04/2027

9) Election of officers

- a) **Chair:** Amber Cohen opened the floor for nominations for chair. Clint Marshall nominated Sue Entsminger for chair, and then Clint Marshall called to close nominations. Sue Entsminger was elected chair by unanimous consent.
- b) **Vice Chair:** Sue Entsminger opened the floor for nominations for vice chair. Clint Marshall nominated Mercedes Starr Knighten for vice chair, and then Clint Marshall called to close nominations. Mercedes Starr Knighten was elected vice chair by unanimous consent.

10) SRC Chair and Members' reports

a) **SRC member reports:**

Clint Marshall reported that there had been some significant cold snaps throughout the winter, including one that lasted for about three weeks. During those cold temperatures, the Tazlina River never froze up completely. He had not seen a lot of moose activity. He had been exploring around the Tazlina River and did not see much animal activity except for coyotes.

Mercedes Knighten was happy there was more sunlight and more local activities going on. She did not harvest a moose this season but did a lot of hunting. She had not been successful ice fishing. She went to a meeting with the Copper Basin Fish and Game Advisory Committee and noted a couple of statewide proposals that were important, including one on ice fishing. She wanted to make sure regulations would change in a way that would make it harder to ice fish. She noted a lot of rivers were going to be shut down for sport fishing this year. She also mentioned a lot of comment periods on different regulations and entities were open.

Dan Stevens said he did not get much moose or fish this year. Few people in Chitina got anything. They had trouble getting a moose for potlatch.

Kaleb Rowland said it had been a cold winter with a lot of snow, which would be rough for moose and other animals struggling through it.

Bruce Ervin said it had been a warm fall and that he heard some hunting success for those in Northway. There was an earlier, colder winter. One person in Northway saw temperatures down to -70. A lot of fuel had been used. He had seen a fox, some lynx, and some grouse, but he had noticed more porcupine between Tok and Northway. There has been concern about caribou between Dot Lake and Dry Creek due to their proximity to the road and the mining trucks.

Suzanne McCarthy said it had been a cold winter, and while her family did get a moose this year, they had not last year.

b) **Chair's Report: Sue Entsminger** said she saw a cow caribou on her drive down to the meeting. They usually did not see bald eagles in the winter but one had been seen around her son's place. There was serious overflow on the Little Tok River, and some cabins had been inundated with water. She had gone to culture camp in Mentasta earlier that week. She decided not to reapply for the Eastern Interior Regional Advisory Council after 24 years.

11) Superintendent's report: Acting superintendent Joshua Scott thanked the Commission for their work. He highlighted some transitions in staffing, including Dr. Barbara Cellarius's recent retirement. Based on concerns from the fall meeting, park staff had invited a navigability specialist to present, have been talking about ethics of park staff who hunt where they patrol or research, and continue to collaborate with Tetlin National Wildlife Refuge on events such as Chosen Frozen. Partnerships were at the heart of park management. Much of the work occurred through partnerships with agencies, organizations, and community groups. He addressed how the park was in alignment with Secretary's Order 3447, Expanding Hunting and Fishing Access, Removing Unnecessary Barriers, and Ensuring Consistency Across the Department of the Interior Lands and Waters.

12) Public Comments: The public comment period was offered both mornings of the meetings.

February 27th:

Brooke McDavid, council coordinator at OSM, said the Eastern Interior Regional Advisory Council had deferred proposal WP26-77 after hearing public testimony and they may propose a modification to the Federal Subsistence Board. The SRC will have an opportunity to discuss the revised modification at their next meeting.

February 28th: No public comments on non-agenda items occurred.

Action Items:

13) Action Items

- a) **Review list of SRC management and research priorities:** Amber Cohen presented the SRC's list of management and research priorities for readoption as staff updated some of the wording and shifted topics around since the last meeting. Kaleb Rowland moved to adopt the research and management priorities as modified which Bruce Ervin seconded. The management and research priorities were adopted by unanimous consent. The updated list is attached to these minutes.

- b) **Secretarial Review of Federal Subsistence Management Program:** Amber Cohen introduced the topic of the secretarial review, which was in the scoping process to receive public comments on the federal subsistence management program. At the fall 2025 meeting, the SRC had created a working group to address the proposed topics. The working group met in December 2025 and developed preliminary recommendations. The SRC held a special meeting on February 3rd, 2026, and after finding out the comment period had been extended, decided to table comments to the spring 2026 meeting. The working group met again on February 25, 2026, and updated their recommendations.
 - i) **Working group recommendations:** The working group recommendations are attached to these minutes.
 - ii) **Public comment:** Kathryn Martin said that at the Department of Interior Open House in Anchorage, the Safari Club had representatives who testified that they were in support of federal preference but wanted the Board in its original structure and a scientific approach to resource management. They had said the State was the only one doing research. However, some of the research funding comes from the federal government. Eva Patton of the Alaska Regional Office suggested timely appointments be added as a topic. Kaleb Rowland suggested a six-month timeline to hear back from the Secretary of Interior.
 - iii) **SRC motion, discussion, and vote:** Kaleb Rowland moved to adopt the working group recommendations as amended by public comment and previous discussion, which Clint Marshall seconded. The motion passed by unanimous consent.

- c) **Timely fisheries updates**
 - i) **Alaska Department of Fish and Game:** Tracy Hansen and Scott Maclean from the Alaska Department of Fish and Game, Glennallen office, gave the update. The previous area manager retired after eighteen years. She showed the Miles Lake Sonar passage, and 895,000 salmon had been counted last year. In 2024, the Alaska Board of Fisheries changed the regulations for commercial fishing in the Copper River District. The fishery could not open prior to May 21, and though this change is not the

only reason, there were more fish passing early in the season in 2025 compared to 2024. The Copper River had low water in May and most of June, and for the first half of June, the river was three feet below average. It remained below average for the rest of the season. Based on preliminary 2025 data, some of the harvest had been lower, due to low water and fish swimming further offshore. She showed the 2025 data for preliminary sockeye salmon harvest in context with data spanning back twenty years. The Copper River District harvested 840,000 sockeye salmon, and the Glennallen Subdistrict subsistence fishery harvested 56,000 sockeye salmon, which is one of the lowest harvests on record. The Chitina subdistrict personal use fishery harvested around 155,000 sockeye salmon. She had expected more sockeye salmon would have been harvested but that dip netting conditions in early June might have impacted that, so a total run estimate was at 1.8 million sockeye salmon returning to the Copper River. The spawning escapement was anticipated to be 645,000, in the sustainable escapement goal range of 360,000 to 750,000 fish.

The Copper River District commercial fishery harvested 5,800 king salmon, one of the lowest commercial harvests of king salmon. The commercial fishery manager took additional actions and pushed the Copper River commercial fleet further offshore as a king salmon conservation measure. The sport fisheries for the Upper Copper River king salmon were restricted last year, as the Gulkana River had been reduced to annual limit of 1 king salmon and then in early July, they further restricted the sport fishery to catch and release only and took away the use of bait and treble hooks for the entire drainage. For the Glennallen Subsistence harvest, 1,300 king salmon were harvested, which was one of the lowest harvests. The Chitina personal use harvest was also low. 70% of king salmon harvested in the personal use fishery occurs in June.

The Canyon Creek fish wheel was drastically impacted by the low river stage height in the first half of June, and the capture rates at the site were lowest on record. All the in-season indicators leaned towards a poor king salmon return, but after the analysis was completed, Native Village of Eyak was estimating that upwards of 35,000 king salmon entered the river, above the goal of 21,000 to 31,000 fish.

In 2025, there was an all-time low of only 86 registered fish wheels in the Glennallen Subdistrict fishery. The low harvest numbers might come from less fish wheels on the river and low water. A majority of permits issued in the state subsistence fishery used to be fish wheel permits, and now it is dipnet permits. Usually, with a strong in-river number of sockeye salmon, there would be more harvest in the subsistence fishery, but because more dip nets have been used, the catch was not as high as in the past. Most harvest in the Glennallen Subdistrict occurred right above the bridge for dipnetting. Very little transport was occurring. Shore harvest of sockeye salmon between Tonsina to Gakona had increased.

For the upcoming season, the sockeye salmon forecast was just under 1.5 million fish, and there is an in-river goal of 635,000 sockeye salmon. The king salmon forecast was 33,000 fish, but the Division of Commercial Fisheries was going to release the

forecast. It was predicted to come in around 42,000 king salmon, still a below average king salmon return, but she was optimistic the run could be better.

Mercedes Knighten appreciated the data on water levels because it validated what they saw on the river that summer. She also supported the move of the commercial fishery out past the barrier islands as she felt there were more salmon that made it up river. She said there were salmon with bright blue coloring on them. She said the cost of fish wheels prevented people from using them. That summer, they taught a class to youth about maintaining a fish wheel.

- ii) **Native Village of Eyak:** Matt Piche gave the report. He said that ice on the Lower Copper River was thicker than it had been, but snow loads were minimal. They suspected a relatively lower-than average snow melt contribution to runoff during early season breakup on the Lower Copper River. The tribal elders had been reporting that winter hooligan run had started based on high numbers of eagles congregating open water leads, though shore ice prevented confirmation with fishing effort.

The 2025 Copper River Chinook Salmon Monitoring Program began sampling in Baird Canyon on May 13 and after 5 days of no catch, caught Chinook salmon on May 18. 2,818 Chinook salmon were tagged at Baird Canyon, and they examined 599 Chinook salmon for marks; 81 were marked at the Canyon Creek recapture site. That was an annual mark rate of 13.8%. Low water had persisted well into mid-June, which resulted in low levels of bank orientation for migrating salmon and impacted the fish wheel per catch unit effort at the Canyon Creek recapture site. From May 13 to July 20, an estimated 35,584 Chinook salmon measuring greater than 500 millimeters fork length migrated through Baird Canyon; the standard error was 9,751. An estimated 5,346 Chinook salmon were harvested on the Copper River flats in 2025, the lowest commercial harvest from 1980-2025 and 57% below the 10-year average in that fishery. Adding the harvest to the in-river abundance estimate provided a preliminary run size of 40,930 Chinook salmon, 11.5% below the 10-year average. The spawning escapement estimate will be subtracted from the 35,584 to determine if the sustainable goal was met. NVE, ADFG, and the Prince William Sound Science Center teamed up to conduct a two-year study to track individual sockeye salmon using radio telemetry as they migrate from the lower river to the spawning grounds. Analysis may be complete before the fall SRC meeting. He also said that the bright blue color Mercedes Knighten witnessed came from fish moving fast upriver with the low water. They were only a week out from salt water.

Clint Marshall asked about the yellow tags. Matt Piche said those were deployed for the mark-recapture project which indicated the fish was tagged at the lower river site. The numbers on it link the time of capture and capture location to the moment it was tagged. The wires that hang out of fish's mouth are able to be redeployed if NVE gets them back in the season.

Kaleb Rowland asked if they recover the tags after the fish reach the spawning grounds. Matt Piche said they did not spend time walking on the spawning grounds, mostly due to a lack in funding.

- iii) **Prince William Sound Science Center:** Pete Rand, Research Biologist at the Prince William Sound Science Center, gave the report. He highlighted a series of workshops held with support from Wrangell-St. Elias National Park; one was held in Copper Center and the other in Cordova. These workshops brought stakeholders together to describe the current state of Copper River salmon and look into the future. They were focusing on the long-term impacts from climate change and how that would affect fisheries. Forty people attended the workshop in Cordova. He recounted Ahtna elder Nick Jackson observing smaller sizes of both king salmon and sockeye salmon. Concern about migratory success of the fish was emphasized often throughout the workshop. A proceedings document will come from the workshop. He also highlighted the Long Lake weir. The fish at Long Lake have a different life history than the other sockeye salmon. They have a smaller body size, different coloration and shape, and are a late run, entering the river in July and entering Long Lake in August and September. Long Lake weir was the longest running weir operation in the watershed and run with support from the local families. The 2025 count was 4,489 fish, which was close to recent years, but runs had been as high as 40 or 50,000 fish. Staff also collected fish after they spawned. They were able to collect otoliths which allow the fish to be aged. They also set up a radio antennae station to track radio tagged sockeye in the system. They were able to document the presence of radio tagged fish at the spawning grounds. They also captured other species, such as bears.
- iv) **AITRC:** Deanna Kosbruk, Regulatory Specialist at AITRC, gave the report. AITRC took lead at Tanada Creek weir in 2025. The minimum count passage was 11,067 sockeye and 1 Chinook. This count started June 19th through September 26th though there was a downtime of no counts due to extreme high water event in July. They were instituting updates to the weir to ensure they got accurate counts. The peak daily passage was around July 21-July 30. Otoliths used for population age compositions were collected at Tanada Lake in mid-September. AITRC plans to continue improving equipment and study design in 2026.
- v) **WRST:** Amber Cohen, acting Subsistence Program Lead, gave the update. Permitting was between the 5-and-10 year average for the Glennallen Subdistrict but higher for the Chitina Subdistrict. Around 54% of permits had been fished in the Glennallen Subdistrict and 46% not fished. Around 52% of permits had been fished in the Chitina Subdistrict and 48% not fished. For both subdistricts, over 95% of harvest reports had been returned, which was the highest return rate since 2002. Reasons heard for not fishing included low water levels, debris hitting wheels, sharing of fish from others, and work or life conflicts.

The overall expanded estimated harvest this season was 19,095 fish, of which 18,561 were Sockeye salmon, 439 were Chinook salmon, 85 were Coho salmon. This overall total harvest was just slightly below the 5- and 10-year averages. Sockeye salmon harvest was also slightly below the 5- and 10-year averages. Chinook Salmon harvest

was 42% below the 5-year average and 51% below the 10-year average. 2018 and 2019 were strong years for Chinook harvest, with a slight uptick in 2022, but harvest has decreased since 2023.

Sockeye harvest in the Glennallen Subdistrict was slightly below average, and Chinook harvest was below average. Sockeye harvest in the Chitina Subdistrict was above average, and though the Chinook harvest was below the 5-year average, it was above the 10-year average.

About 70% of fish were harvested by fish wheel and 30% by dipnet, but the dipnet harvest was a little higher than the 5-year average and significantly higher than the 10-year average (48% above). Most harvest occurred in June and July (46% and 33% respectively, 80% in total) for the Chitina Subdistrict. For the Glennallen Subdistrict, most harvest occurred in July (almost 50%). In the Glennallen Subdistrict, most of the fish were caught in the section between Tonsina to Gakona. For the Chitina Subdistrict, O'Brien Creek and Haley Creek were locations with the most harvest.

d) Call for proposals to change federal subsistence fisheries regulations

i) **Introduction:** Amber Cohen introduced the process for changing federal subsistence fisheries regulations.

ii) **Opportunity for public comment:**

Deanna Kosbruk, Regulatory Specialist for AITRC, said she had been hearing from elders about delaying commercial fishing to ensure fish make it upriver to their spawning grounds. Amber Cohen explained that proposal would have to go in front of the Board of Fisheries at their next cycle in the area, which Tracy Hansen said would be in 2027.

Dave Sarafin, Tazlina resident, said the differences in eligibility between the Glennallen and Chitina subdistricts have confused users and staff. Both subdistricts are managed the same under federal management, such as same season and same eligible gear types. What is not managed the same is who can fish there. Someone can fish immediately upstream of the bridge but also in the lower river. There is a seven mile section they cannot fish in the middle. There is confusion for people who live along the McCarthy road as technically, people between Chitina and McCarthy do not have C&T to fish below the bridge.

iii) **SRC motion, discussion, and vote:** Kaleb Rowland moved to develop a proposal to include communities along the McCarthy Road out to Dan Creek and up to Kennicott for C&T for the Chitina Subdistrict which Dan Stevens seconded.

Sue Entsminger said a member of the public brought up the inconsistencies and lack of clarity in the eligibility. The people between those communities should qualify but it is not specifically in regulation. She would like to know why these inconsistencies occur. Kaleb Rowland supported the motion because there are communities along the McCarthy Road that are currently in a grey area as they could qualify through Chitina

or McCarthy. These people practically live on the river. The motion passed by unanimous consent.

e) **Opportunity to comment on Statewide Finfish and Supplemental Issues:**

i) **Introduction:** Amber Cohen introduced the topic and went through proposals.

ii) **Proposals:**

- **Proposal 162:** Submitted by the Ahtna Intertribal Resource Commission, this proposal sought to prohibit subsistence fishing transportation services.
 - (a) **Public comment:** Deanna Kosbruk, AITRC, said that in times of low abundance, the State should practice precautionary management, and commercial transport services were not customary and traditional uses that should be allowed under a subsistence permit.
 - (b) **SRC motion, discussion, and vote:** Mercedes Knighten moved to support proposal 162 which Bruce Ervin seconded. Mercedes Knighten said if someone is paying a commercial service to go to a traditional area, they are not sure where they are going. Subsistence users know their areas. Dan Stevens was concerned about enforcement of transporters. Kaleb Rowland was in opposition to this proposal statewide and said it should be targeted to concerns on the Copper River. Sue Entsminger also was concerned about supporting the proposal statewide. Sue Entsminger called for a roll-call vote, and the motion passed with 5 in support and 2 in opposition.
- **Proposals 163, 164, 165:** These proposals targeted trawling methods.
 - (a) **Public comment:** Deanna Kosbruk, AITRC, said they supported these proposals and that when trawling is restricted, populations rebound.
 - (b) **SRC motion, discussion, and vote:** Mercedes Knighten moved to adopt proposals 163, 164, and 165 which Clint Marshall seconded. Mercedes Knighten supported the proposals because they focused on changing gear and regulating trawlers. Trawling scrapes the sea bottom, which decimates fish populations like halibut. Sue Entsminger said it was concerning how fish numbers on the Yukon had decreased and said the trawl fishery had to be managed more than it currently is. The motion passed by unanimous consent.
- **Proposal 175:** Submitted by the Ahtna Intertribal Resource Commission, this proposal sought to modify the dipnet mesh-size and configuration.
 - (a) **Public comment:** Deanna Kosbruk, AITRC, said after meeting with their Fish and Wildlife Committee, they added a friendly amendment to say that the frame must be attached to a single rigid handle and that the mesh size should be lowered to 3.5 inches in order to release Chinook from the net.
 - (b) **SRC motion, discussion, and vote:** Clint Marshall moved to support proposal 175 which Mercedes Knighten seconded. Bruce Ervin brought up concerns about 3.5 inches being too small for whitefish dipnetting in the Tanana River and that he preferred 4 inch mesh. Kaleb Rowland said he would oppose this proposal because it was too broad when other species may require a bigger dip net. Sue Entsminger asked if the proposal could be modified to specifically target dip net size of salmon. Tracy Hansen from ADFG-Glennallen said the dip net is defined in regulation for the entire state, not by species. Clint Marshall rescinded his motion, and Mercedes Knighten rescinded her second.

Clint Marshall then moved to support proposal 175 with an amendment to specify the species targeted for 3.5 mesh size as salmon. Bruce Ervin seconded. Clint Marshall said he was in support in order to reduce the mortality rate of salmon caught and then released. Kaleb Rowland said he supported the amendment for targeting salmon. The motion passed by unanimous consent.

- **Proposal 181:** Amending sport fishing gear
 - (a) **Public comment:** Deanna Kosbruk, AITRC, commented that the Fish and Wildlife Committee had concerns about restrictions on the use of tip ups when ice fishing.

Dave Sarafin, Tazlina, said the Copper Basin Fish and Game Advisory Committee discussed these proposals and there was confusion until it was explained that the main issue was radio-controlled devices. They discussed that the Department should be clearer in their intent.

- (b) **SRC motion, discussion, and vote:** Mercedes Knighten moved to adopt proposal 181 which Bruce Ervin seconded. Kaleb Rowland said he was opposed to the proposal because it was too ambiguous and suggested the Department put in a proposal that prohibits remote controlled gear. The motion failed by a voice vote of 1 in support and 5 in opposition.

14) Set tentative date and location for next SRC meeting: Kaleb Rowland made a motion to set the primary dates for September 25th-26th, 2026, and October 9th-10th, 2026, as the alternate dates, in McCarthy with the Wrangell-St. Elias National Park Visitor Center in Copper Center as the alternate location. Clint Marshall seconded. The motion passed by unanimous consent.

Reports:

15) Reports related to old and new business

- a) **Navigability presentation:** Gavin DeMali, navigable water specialist at the NPS Alaska Region, gave the presentation. States owned the submerged lands of navigable waters so they owned the lands beneath the water bodies that are deemed legally navigable for title purposes. Two overarching categories constituted navigable waters: waters that were tidally influenced and inland water bodies. The Submerged Lands Act codified this principle of state ownership of submerged lands of navigable water bodies into statute as well as specified that the ordinary high watermark delineated the submerged lands. He highlighted the 1870 Daniel Ball Supreme Court case, which established a foundational definition for navigable in fact. He summarized that a water body is navigable if it used, or susceptible of being used, as a highway for trade travel and commerce and the waterways natural and ordinary condition at the time of statehood and crafts customary at statehood or crafts that are meaningfully similar to those that would have been customary at the time of statehood. Navigability was generally settled in court, but the Bureau of Land Management did make administrative navigability determinations. Federal subsistence regulations still applied on navigable waters within and adjacent to ANILCA designated conservation units.

Kathryn Martin asked about who owned the land of a water body that has dried up within an ANCSA conveyance. Gavin DeMali said that would be an instance of reliction, and the adjacent upland landowner would receive ownership of the land.

Bruce Ervin asked about ownership of a river that erodes the land and ends up in a village's townsite or native allotment. Gavin DeMali said ownership of submerged lands moved in instances of erosion. For a navigable water body, the State would receive ownership of the lands that were eroded, as long as the changes were gradual. For an avulsive event, ownership would remain fixed to the pre-change conditions.

Suzanne McCarthy asked about the property and movement of the river. Gavin DeMali said in the case where someone owned a property next to a navigable river that was eroding into their property and carving away at their land, that person would lose ownership of the land as it became submerged. However, if there was property next to a navigable river and that river started depositing sediment and building a shoreline, the land would become that property owner's as it is added to the uplands.

Sue Entsminger asked if a judge determines these disputes. Gavin DeMali said if two parties with an interest cannot come to agreement outside of a court, then a judge would decide.

- b) **Report on recent Federal Subsistence Board Work Session:** Eva Patton, Subsistence Program Manager for the NPS Alaska Regional Office, gave the report. The Federal Subsistence Board held a work session on February 4th and 5th with the primary goal to review the Fisheries Resource Monitoring Program. A notice of funding opportunity call for research proposals published every two years to fund fisheries research and monitoring projects such as stock status trends and documentation of traditional knowledge. For the current round of FRMP funding, the Klutina River Salmon Monitoring Project, the Tanada Creek weir, and the in-river abundance of Copper River Chinook salmon were supported for funding by the Federal Subsistence Board.

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

- a) **NPS Alaska Region Subsistence Program Report:** Alaska Regional Office Subsistence Program Manager Eva Patton gave the report. She highlighted the internal Subsistence Advisory Council that had a budget of \$400,000 a year dedicated to subsistence research and monitoring on National Park lands and monuments in conjunction with local communities. The region had a new acting regional director, Don Striker, who started in mid-October. Subsistence team member Dillon Patterson had taken a new position with Sealaska Heritage Institute.
- b) **Wildlife Report:** Kyle Cutting, wildlife biologist, gave the report. He focused on Dall sheep work. A paper was published on Dall sheep survey methods. They surveyed the long-term count areas around the Nabesna area on the north side of the Wrangell Mountains. The 2025 adult Dall sheep estimate appeared higher than the previous couple of years in the Nabesna, Mentasta, and Nutzotin Mountains. They detected a consistent

but slight decline in the number of lambs to ewe ratio. It appeared the sheep were on the rebound in the Nabesna area. They were hoping to do more sheep surveys in summer 2026. He also crafted proposals for the Subsistence Advisory Council fund source. One was a fall moose survey, and another was to look at diet patterns of brown bears in the vicinity of Esker Stream cabin.

- c) **Fisheries Report:** Amber Cohen, acting Subsistence Program Lead, gave the report. The park's fisheries biologist had retired the previous May. With AITRC, the park was working on an inventory of harvestable fish in 10 freshwater lakes in the park and preserve. Throughout the summer of 2025, federal managers monitored the run strength to evaluate the need for any appropriate fisheries management actions, and no federal special actions were issued. Federal harvest opportunities remained open the entire season. She emphasized the importance of partnerships. The park coordinated with the Alaska Department of Fish and Game, Glennallen office, on preseason coordination, communications, and post-season data sharing and reports. They also coordinated with the Chugach National Forest, Native Village of Eyak, and the Prince William Sound Science Center. The 2025 Lower Copper River Federal Subsistence fishery opened on June 1st and remained open until September 30th. 146 permits were issued, 905 sockeye salmon, 21 Chinook salmon, and 3 Coho salmon were harvested. For the upcoming fisheries season, park staff planned to meet with different partners such as Fish and Game, Native Village of Eyak, Chugach National Forest, and AITRC for preseason coordination. The federal subsistence salmon fishery will open May 15th and should remain open until September 30.

- d) **Subsistence/anthropology report:** Amber Cohen, cultural anthropologist, gave the report. Along with David Hooper at AITRC, she had been working on an Alternative Harvest Monitoring Methodology Project, and they have conducted one interview so far and were looking for more participants. The park and Tetlin National Wildlife Refuge issues 221 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 the Unit 11 fall moose hunt which had 147 permits issued, 55 people hunted, and 5 moose harvested. This resulted in a 9% success rate for the season, which was lower than the 5 and 10 year average of 13 moose harvested. For the RM-291 hunt, success rates were also lower and had been decreasing since 2022. Federally qualified hunters continue to take most of the harvest, harvesting 8 out of 13 moose this year. For the Unit 11 goat hunt, 5 individuals hunted and 1 goat was harvested. For the Unit 11 winter moose hunt, 6 people hunted and 2 moose were harvested. For elder sheep hunt in Unit 11, 11 people hunted and 2 sheep were harvested. For Unit 12 Chisana caribou hunt, 4 people hunted and no caribou were harvested. For Unit 12 elder sheep hunt, 2 people hunted and no sheep were harvested. She updated that the technical report for the Upper Copper River harvest assessments had been delayed. There was a preliminary report written for the Dall sheep local knowledge interviews. Copper River in-season teleconferences were planned to continue throughout summer 2026. She and the park's geologist were heading to Yakutat for a cultural exchange and landscape observation discussions with elders from Cordova.

- e) **Interpretation and Education report:** Acting Superintendent Joshua Scott gave the report. Over 100,000 visitors went to Wrangell-St. Elias last year, though projections

might be lower for 2026. The park engaged with gateway communities, having conducted over 3,000 contacts through school visits, field trips, and events hosted at the park. Chosen Frozen is scheduled from March 24-25 at the Kendesnii Campground off the Nabesna Road. The park conducted outreach to communities through social media and the local listserv. The park was hiring for some season positions utilizing local hire and the difference this year was applications had to go through USAJobs.gov.

Kaleb Rowland asked about the status of the firewood harvest recommendations the SRC developed. Amber Cohen said it was being reviewed internally with the goal of putting it into the compendium and that the 1989 green log policy was still in effect. Dead and downed trees did not require a permit but if someone wanted to harvest green logs, they would come to the park for a special use permit.

- f) **Trails report:** Jesse Heinbaugh, backcountry and trails maintenance supervisor, said that in fiscal year 2025, their efforts were focused on executing various cyclic maintenance projects aimed at ensuring safety and accessibility of public trails, airstrips, and cabins. They worked on Chisana airstrip and Skolai Pass airstrip as well as cyclic maintenance on several cabins. They completed spring trail openings of Caribou Creek, Soda Lake, Skookum Volcano, Rambler Mine, Dixie Pass, Kotsina River, Crystalline Hills, Root Glacier, Bonzana Mine, Jumbo Mine, and Erie Mine. Though they had the lowest number of trail crew members, they completed an impressive amount of work. For backcountry projects, Visitor and Resource Protection staff made a trip between Tanada Lake to Jacksina River for route-finding data. They also worked on a Federal Highways Administration resource and alternative transportation program planning centered around the Nabesna Road. For 2026, planned projects included cyclic maintenance for Jumbo Mine and Bonzana Mine trails and the Caribou Creek OHV trail. Nizina-Chitina Confluence airstrip, Tebay airstrip, and Horsfeld airstrip had planned cyclic maintenance.

18) Reports from other organizations and agencies

- a) **Ahtna Intertribal Resource Commission:** Sterling Spilinek, wildlife biologist, gave the report. For the Mentasta caribou project, they conducted aerial surveys in 2025 from May to mid-July. There was a peak calf-cow ratio of 47 to 100 on June 13th, and on the final survey on July 16, there was a calf-cow ratio of 34 to 100. They saw numerous golden eagles and brown bears in the vicinity of the core areas of collared females. For the wolf study, in November 2024, they captured and collared 9 wolves and had been tracking those individuals. 3 individuals died, 2 were due to predators and 1 was a heart attack. A trapper donated 50 wolves for sampling. The project has been extended to September 30, 2026, with the hope of getting more collars out and continuing sample collection. For the Dall sheep project, they were receiving hunter-donated samples and looked at those for heavy metals and essential minerals to look at dietary intake and disease prevalence. In the 6 samples, none had *m.ovi*. For the bear project, they received an updated data sharing agreement and had been working on the spatially explicit capture-recapture model and a resource selection function model to look at the life history of what bears used. By combining the two, the hope was to get a density and abundance across the landscape. For ecology work, they collected 148 salmon samples and found equal portions of roundworms, spiral nematodes, and occasional tapeworms. In 2024, they collected 84 samples, and in 2025, they collected 83 samples. They also collected 1,800 genetic

samples for the genetic stock identification project in partnership with Wrangell-St. Elias and ADF&G Gene Conservation Laboratory. For the moose health study, a total of 110 samples had been collected over three years and were currently being evaluated for heavy metals and essential elements. AITRC was a co-PI with ADF&G on the Gulkana River sonar feasibility project and a project with Prince William Sound Science Center on radio telemetry of juvenile Chinook salmon. AITRC had a vacancy for a stream habitat restoration biologist. The anthropologist was concluding the Tribal Historic Preservation Office in the Chitina area. In-season teleconferences were planned for the upcoming summer. The tribal stewardship coordinator was documenting past and present use by tribal members to understand tribal concerns and explore key issues in conflict with tribal stewardship values. The education and outreach coordinator has been hosting salmon in the classroom and conducting weekly science lectures at the elementary school. AITRC also hosted a Fish and Wildlife Techniques 1 credit course and a fetal moose dissection at the high school. Their annual meeting was scheduled for April 16 and 17 at the Buster Gene Memorial Hall in Gakona.

- b) **ADF&G-Tok:** Written report was provided.
- c) **Bureau of Land Management:** Caroline Ketron, anthropologist and Subsistence Coordinator, gave the report. She covered staffing updates at BLM. They continued to work with Fish and Game to monitor moose and caribou in Unit 13. BLM requested funding to support surveys and community harvest assessments. Wildlife proposal 26-27 addressed BLM's management authority of caribou in Unit 13. They also worked with AITRC on the community harvest system. Moose harvest had not been high in Unit 13 as only 36 bulls were harvested. This was lower than average.
- d) **Tetlin National Wildlife Refuge:** Written report was provided.
- e) **Sahara Iverson, UAF Graduate Student:** Sahara Iverson provided an update to her project. She reviewed SRC and RAC transcripts from 1994 to 2024 to look at salmon availability in the Copper River. She tracked frequency of mentions regarding good and poor availability for each year. Good availability meant individuals having the physical and social means to access fishing areas and when salmon populations were sufficiently abundant to meet cultural and nutritional needs. She developed a framework based on reoccurring themes that identified the two primary drivers of availability, access and abundance. She read through transcripts and marked every instance where a statement highlighted an aspect of availability, and there was an overwhelming majority of poor availability to salmon within the last decade. Her next step was to correlate the qualitative data set with quantitative data sets like harvest reports, abundance estimates, and environmental variables. Three trends had stood out. Higher commercial harvest often coincided with better upriver availability. Both commercial and upriver harvest were driven by the overall strength of the run. In high return years, there were enough salmon for both the commercial fleet and upriver subsistence users. Sport and personal use harvest had a negative correlation with upriver availability. The peak date of the run seemed to be the most critical predictor of whether salmon was available or not.

19) Letters of recommendation to the Governor and Secretary:

Kaleb Rowland moved to write a letter that highlighted the February meetings, the effort of the working group, and reiterated the timely appointments of SRC members. Dan Stevens seconded. Mercedes Knighten suggested mentioning the incident with the Governor's appointment expiring in the middle of the September SRC meeting. Clint Marshall said to highlight the role of the SRC and its responsibility. Mercedes Knighten said to express the importance of the commission and that was not just the members' time but also the staff and the public. The motion passed by unanimous consent.

20) Work session: Amber Cohen led the work session in which two letters, the one to the Secretary of Interior on the Secretarial Review comments, and one to the Board of Fisheries on comments on Statewide Finfish and Supplemental Issues proposals, were reviewed and edited.

21) Closing comments:

Mercedes Knighten was appreciative of being on the commission and extended her gratitude to the researchers, agency partners, and project leads that actively incorporated commission knowledge into their work. She noticed how much they had increased information to the commission and how they had let the commission guide them in finding funding and developing projects. Each member of the commission brought essential perspectives to the table. For those who lived close to the land, the resources were an absolute necessity to survival and cultural identity. She appreciated the strength of the partnerships of the agencies that worked together. By working together, they will ensure that the land will continue to provide for their children and grandchildren.

Dan Stevens thanked the commission for their support.

Bruce Ervin said he appreciated the public for providing comments, the commission for their time, the staff for their effort, and the coordinator for putting the meeting together.

Clint Marshall thanked everyone for their participation and highlighted the work of the coordinator who, after the SRC meeting, provides the comments to the RACs.

Sue Entsminger agreed with Clint and appreciated the commission's confidence in her as a chair. They had a great group that respected each other. She thanked Barbara Cellarius for training the current coordinator and thanked them both for their work.

22) Adjourn meeting: Kaleb made the motion to adjourn. Dan Stevens seconded. The motion passed by unanimous consent. The meeting adjourned at 12:29 P.M. on February 28th.

Research and Management Priorities

Wrangell-St. Elias National Park Subsistence Resource Commission

Adopted on February 27, 2026

Food security is our highest priority, and the following research questions and management objectives have been developed to facilitate food security for communities associated with Wrangell-St. Elias National Park. The Nelchina caribou herd, moose, Dall sheep, mountain goats, Copper River sockeye salmon and Chinook salmon, game birds, and whitefish and other non-salmon species are important food resources that drive the development of these priorities. We encourage park management to think outside of the box in addressing food security for local communities. We encourage park management to incorporate traditional and local knowledge to inform priority research questions.

Priority Research Questions to Inform Food Security Management:

- Evaluate and understand the drivers of population dynamics of the important food resources listed above, including but not limited to predation.
- Study impacts of eagle predation on harvested species (for example, sheep lambs, caribou calves, and salmon).
- Study the prevalence and impacts of disease (e.g., *Mycoplasma ovipneumoniae* – *M.ovi*) on sheep populations.
- Study effects of environmental change on subsistence resources and uses, for example:
 - The interaction between changes in environmental factors such as, but not limited to, snow cover, precipitation and flooding events;
 - Melting permafrost and its effect on water quality and composition, animal migration patterns, and human access for hunting, gathering, and trapping;
 - Changing river conditions (e.g., debris, high water levels, seasonal temperature changes, river freeze-up and break-up, and riverbank morphology) and impacts to fish wheel use, fishing success, and catch-per-unit-effort; and
 - Resource damage from transportation methods of non-local users (i.e., from ATVs).

Management Priorities:

- Increase opportunities for educational outreach (including using various forms of media) on topics such as traditional processing methods, respect, access, and land status, among others.
- Increase people’s awareness of available resources, such as the full range of edible plants and how to use the whole animal.
- Increase educational outreach regarding harvest opportunities for wolf, bear, and coyote populations through venues such as trapping classes/workshops.
- Collaborate with partners on hunter education workshops (i.e., “Hunter Success”).
- Promote safety of subsistence users, especially on rivers.
- Provide local communities with subsistence firewood harvest opportunities as part of hazard fuel reduction efforts near communities.
- Manage fires to benefit wildlife, for example:
 - Prescribed burns to benefit wildlife habitat, and
 - Considering wildlife habitat benefits in wildfire management decisions, i.e., let it burn when feasible.

Wrangell-St. Elias National Park Subsistence Resource Commission

Working Group on Secretarial Review of the Federal Subsistence Management Program

Members: Dan Stevens, Mercedes Starr Knighten, Clint Marshall, Bruce Ervin, Sue Entsminger

NPS Staff: Amber Cohen

Updated Recommendations from February 25, 2026

- g) The 2024 move of the Office of Subsistence Management, from within the U.S. Fish and Wildlife Service of the Department of the Interior, to the Office of the Assistant Secretary for Policy, Management and Budget of the Department of the Interior:

Recommendation: Leave the Office of Subsistence Management in the Office of the Assistant Secretary for Policy, Management, and Budget of the Department of the Interior. This is a recent move that has had beneficial outcomes. However, Office of Subsistence Management staff should remember to stay engaged with subsistence users. This change moves subsistence out from under a single agency and into the policy heart of the Department of the Interior. By giving the program direct access to senior leadership and tribal liaison resources, this move recognizes that subsistence is a wildlife management, civil rights, and sovereignty issue.

- h) Criteria for regional advisory council membership:

Recommendation: Regional Advisory Councils (RACs) should be made up of local people who know their region. Currently, RAC membership is comprised of 70% subsistence users and 30% commercial/sport users. However, it has been difficult to fill these seats, so more outreach is needed to get people to apply. The current qualifications to become a RAC member are comprehensive and should not change; however, OSM should consolidate questions on the application, as they are duplicative. ANILCA Section 805 requires that RACs be composed of local residents. The current criteria ensure that rural residents remain the primary voice. To "balance" these councils with more urban or commercial interests would dilute the very local expertise that Congress intended to protect, and to centralize authority or reduce the role of RACs is a direct violation of the spirit of ANILCA Section 805, which mandates local participation.

i) Membership of the Federal Subsistence Board:

Recommendation: Keep the current membership structure of the Federal Subsistence Board (“Board”) because it allows more public involvement in the process. Before public members were added, the Board was dominated by federal agency directors. Adding Tribally nominated seats ensures that the people with the most at stake—those whose survival depends on the land—have a voice and a vote. A Board comprised only of agency heads, as requested by some, would lack the "on-the-ground" expertise required by ANILCA. Public members add cultural context and fill in the gaps in the data.

j) Federal regulations and state regulations for duplication and inconsistency:

Recommendation: Clarity with state and federal regulations would help users understand the situations on federal land. For example, when there is a closure to non-federally qualified subsistence users, there should be more outreach to the public so they can be informed. While consistency is a good concept, it cannot come at the cost of the rural priority. The rural priority helps people in rural areas put food in their freezers. The State of Alaska is legally barred by its own Constitution from providing a rural priority. Therefore, federal regulations must be different, or what might appear inconsistent, to satisfy the federal mandate of ANILCA. Deference to the State is only appropriate if the State provides the same level of protection for rural users, which it currently cannot do. To end dual management, there needs to be a Constitutional change by the State of Alaska so that would bring the State in alignment with ANILCA.

k) Regulations applicable to special actions:

Recommendation: The Federal Subsistence Board and delegated federal managers should be able to use special actions to protect resources such as fish and wildlife. Special actions are important tools for managers. For example, the Unit 12 moose hunt was extended by special action by 10 days from September 20th to September 30th after the delegated federal manager heard concerns about the warming climate slowing moose movements until after the season had closed. This special action in 2024 allowed subsistence users additional opportunities to fill their freezers for the 2024 and 2025 regulatory years. The Federal Subsistence Board closed Federal public lands in Unit 13B to moose hunting by non-federally qualified users for the 2024 and 2025 seasons in response to concerns about low moose population and increased competition impacting harvest success for federally qualified subsistence users. Special actions are decided in coordination with the Board and concerned communities, and they involve extensive consultation with different agencies. The ability to make special actions allows the Board and managers to adapt to changing conditions in-season and protect subsistence rights. These actions ensure that resources exist for future generations.

l) Role of the State of Alaska and its Department of Fish and Game in the Federal Subsistence Management Program:

Recommendation: The federal subsistence management program exists because the State of Alaska cannot legally manage for a rural preference. It is important that local rural voices are heard in these processes, and that their voices are given a greater weight and leverage than those who do not live in the state. The State should be involved in technical coordination, continue to have a liaison to the Board, but should not be given a vote. The State should not have a "veto" over federal subsistence decisions if it cannot implement a rural priority.

m) Board policies and procedures for rural determinations:

Recommendation: The Board should consider a variety of factors for rural determinations. Rural areas cannot only be determined by factors such as accessibility to larger towns or availability of roads. The current process uses a combination of population data and socio-economic "character", such as, their access to stores and resources. To be "rural" is more than a population number; in fact, it is a deeply rooted and culturally significant way of life. A rigid numerical cutoff (like "any town over 5,000 is urban") would unfairly strip rights from communities in the Copper Basin and communities associated with Wrangell-St. Elias National Park and Preserve that remain deeply dependent on the land and the resources. Rural determination should be done on a case-by-case basis. The Board should consult the RACs as they have the knowledge of the area. Rural preference exists because it critically helps those living out in rural places.

n) Any additional topics about federal subsistence management the SRC wants to provide:

- Appreciation for adding tribal consultation and extending public comment period