



Ahtna Intertribal Resource Commission

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COMMUNITY HARVEST SYSTEM REPORT, 2023-2025

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EXECUTIVE SUMMARY

The Ahtna Intertribal Resource Commission (AITRC) administers a federally authorized Community Harvest System (CHS) for moose and caribou within the Ahtna Traditional Territory on federal public lands open to subsistence hunting. Community hunts, under both state and federal subsistence regulations, support community patterns of customary and traditional use that differ from individual or household use patterns. Participants in a community harvest system can use a pooled community bag limit, allowing them to take more than an individual hunter's bag limit to feed the community or group. This report provides an overview of the legal foundation, development, administration, participation trends, and outcomes of the AITRC CHS since its authorization by the Federal Subsistence Board (FSB), effective July 18, 2022 (87 FR 44846).

The CHS reflects a cooperative management framework grounded in federal law, Indigenous Knowledge, and scientific wildlife management. While harvest success has been limited, participation has steadily increased, administrative efficiencies have improved, and the program has generated valuable data on hunting effort, access challenges, and subsistence participation within Game Management Units (GMUs) 11, 12, and 13. This report includes recommendations for the ongoing wildlife cycle of the Federal Subsistence Management Program, in which the Regional Advisory Councils and the Federal Subsistence Board will deliberate on several regulatory change proposals to extend or shift moose hunting seasons.

REGULATORY AND PROGRAMMATIC BACKGROUND

Introduction

The Ahtna Intertribal Resource Commission (AITRC) represents eight federally recognized Tribes and two Alaska Native Claims Settlement Act (ANCSA) Native Corporations within the Ahtna Traditional Territory. These entities include the communities of Cantwell, Mentasta, Chistochina, Gakona, Gulkana, Tazlina, Copper Center, and Chitina, along with Ahtna, Incorporated and Chitina Native Corporation.

AITRC is governed by a Board of Directors composed of representatives from each of these ten entities. Board members possess deep cultural, historical, and ecological knowledge rooted in

Honoring and integrating traditional knowledge and values of the 'Atnahwt'aene (Ahtna people) through stewardship that is innovative and respectful of the land for all generations of people who depend on the Ahtna Territory to maintain their cultural identity and ways of life. Tsin 'aen (Thank you in Atnakenaeg).

generations of subsistence use and stewardship. AITRC operates under the guidance of these leaders to integrate Indigenous Knowledge (IK) with scientific best practices to support sustainable wildlife management and fill data gaps in federal subsistence decision-making.

What is a Community Harvest System?

Community hunts, under both state and federal subsistence regulations, recognize community patterns of customary and traditional use that differ from individual or household patterns of use. Participants in a community harvest system pool their individual household bag limits into a community bag limit, where an individual participant can harvest more than an individual hunter's bag limit in order to provide for the community's needs. Since the 1980s, ADF&G Division of Subsistence research has demonstrated that on average 30% of a rural community's households harvest 70% of the wild foods used by the community.¹ The AITRC CHS serves to recognize this community pattern of use in federal subsistence hunting regulations.

AITRC-DOI Memorandum of Agreement

In 2016, the U.S. Department of the Interior (DOI) and AITRC entered into a Memorandum of Agreement (MOA) authorizing cooperative wildlife management activities on federal public lands within the Ahtna Traditional Territory. This agreement established the framework for increased Tribal participation in subsistence management and laid the foundation for the AITRC-administered Community Harvest System's development through pre-existing federal community harvest system regulations (i.e. 43 CFR 51.6(e)).

Development of the Community Harvest System

In late 2018, AITRC submitted a Special Action Request and draft community harvest framework proposing eligibility limited to Ahtna Tribal citizens. The Office of Subsistence Management (OSM) determined that this approach was inconsistent with the Alaska National Interest Lands Conservation Act (ANILCA), which requires inclusion of all federally qualified rural residents of the named communities.

Following this determination, AITRC continued to advocate for MOA implementation and requested that DOI initiate rulemaking to allow for Tribal wildlife management authority. In early 2020, AITRC submitted Special Action Request WSA20-02, seeking a temporary federal community hunt for moose and caribou in GMUs 11 and 13.

In response, the Federal Subsistence Board adopted—with modifications—a Community Harvest System authorizing:

¹ Fall, James A. 2008. Why There is a Division of Subsistence at ADF&G. Alaska Fish & Wildlife News, August 2008. Riley Woodford, Ed. ADF&G, Juneau. https://www.adfg.alaska.gov/index.cfm?adfg=wildlifeneews.view_article&articles_id=391; See also: ADF&G Division of Subsistence. 2012. Alaska's Economies and Subsistence. ADF&G, Juneau. https://www.adfg.alaska.gov/static/home/library/pdfs/subsistence/ak_economies_subsistence.pdf

- Moose harvest in GMU 11, and
- Moose and caribou harvest in GMU 13.

Subsequent actions by the FSB expanded the CHS to include GMU 12 and extended the system over multiple regulatory years to allow development of a comprehensive administrative framework and continued coordination with federal land management agencies.

On January 27, 2021, the Federal Subsistence Board formally approved the AITRC Community Harvest System for federally qualified rural residents of the eight Ahtna villages. Subsequently, the Office of Subsistence Management initiated additional regulatory actions to clarify details associated with the AITRC CHS registrants and participating community residents who choose not to participate in the CHS (43 CFR 51.25(c)(5)) and that a CHS registrant may serve as Federal Designated Hunter for another federally qualified resident not participating in the CHS (43 CFR 51.26(n)(11)(i)(C); 43 CFR 51.26(n)(12)(i)(D); and 43 CFR 51.26(n)(13)(iii)(C)). The current AITRC CHS regulatory structure became effective July 18, 2022 (87 FR 44846).²

CURRENT ELIGIBILITY AND SCOPE

Participation in the AITRC Community Harvest System is open to all federally qualified subsistence users whose primary residence is within the Census Designated Places³ (CDP) surrounding the villages of:

- | | |
|---------------|-----------------|
| • Cantwell | • Gulkana |
| • Mentasta | • Tazlina |
| • Chistochina | • Copper Center |
| • Gakona | • Chitina |

The CHS applies to Bureau of Land Management (BLM), National Park Service (NPS), and Fish and Wildlife Service (FWS) lands within the designated geographic area.

Registration through AITRC satisfies requirements for participation on BLM, NPS, and FWS lands, eliminating the need for participants to register separately with each federal agency. Participation in the CHS is voluntary and operates in full compliance with existing federal subsistence regulations (i.e. methods and means, seasons, and bag limits).

² Note: Originally the AITRC CHS was promulgated in 50 CFR Part 100 (USFWS) and 36 CFR Part 242 (USDA) regulations; however, effective July 18, 2025 federal subsistence regulations 50 CFR Part 100 were relocated to 43 CFR Part 51 following the relocation of the Federal Subsistence Management Program from the US Fish and Wildlife to the Department of the Interior, Assistant Secretary’s Office of Policy, Management, and Budget, effective July 15, 2024 (Secretarial Order 3413).

³ CHS registrants hunting on NPS lands must also be rural residents of NPS-determined Resident Zone Communities (e.g., only Cantwell CDP residents within a 3-mile radius of the Cantwell Post Office are qualified to hunt on Unit 13 lands within Denali National Park and Preserve).

Administration and Implementation

AITRC is responsible for administering the CHS in coordination with federal partners.

Administrative responsibilities include:

- Registration and eligibility verification
- Quota and effort tracking
- Registration, harvest, and non-harvest weekly reporting throughout hunt seasons
- Coordination with Wrangell-St. Elias National Park and Preserve (NPS-WRST), Denali National Park and Preserve (NPS-DPP), BLM-Glennallen Field Office (BLM-GFO), Tetlin National Wildlife Refuge (TNWR), and the Office of Subsistence Management (OSM)

AITRC partners with federal agencies through:

- Joint registration events
- Distribution of applicable federal regulations
- Weekly transmittal of registrant lists and harvest information to federal points of contact

Eligibility verification includes review of:

- State of Alaska hunting licenses or permanent identification cards
- Alaska driver's licenses or other residency documentation

AITRC ensures registrants are informed of reporting requirements for both successful and unsuccessful harvests and monitors compliance with reporting timelines.

PARTICIPATION TRENDS AND OBSERVATIONS

Since implementation, participation in the AITRC CHS has increased gradually. In addition to standard harvest reporting requirements within both state and federal systems, AITRC tracks:

- Number of registered participants
- Number of days hunted
- Reasons for non-harvest

While successful harvests have not yet occurred, participation data highlight persistent challenges within GMUs 11, 12, and 13, including:

- Low overall subsistence participation rates
- Environmental factors such as warmer seasonal conditions early in hunt seasons
- Access limitations and increased traffic
- Increased competition from non-local and urban hunters

Seasonal Participation Summaries

The AITRC CHS numbers of registrants, those who hunted, and days hunted are summarized in Figure 1 for the 2023, 2024, and 2025 hunting seasons. Subsistence hunting of the Nelchina caribou herd has been closed during this time period. As a result, this report is limited to summarizing the AITRC CHS for moose on federal public lands in units 11, 12, and 13.

Fall 2025 Season

During the 2025 moose season, AITRC registered twenty-six (26) participants under the federal moose hunt in GMUs 11, 12, and 13. AITRC staff ensured timely and accurate harvest reporting to its federal agency partners: The National Park Service (Wrangell St. Elias and the Denali), the Bureau of Land Management, the Office of Subsistence Management, and the USFWS Tetlin Wildlife Refuge.

- Twenty-four (24) reported hunting activity
- Two (2) reported no hunting activity
- A total of 290 days were hunted by the 24 registrants, with an average of 12 days.
- No successful harvests were reported under the AITRC CHS during the 2025 season.

Staff also conducted outreach and registration assistance in three Ahtna villages located farther from the AITRC office in Glennallen, improving accessibility for participants.

Fall 2024 Season

During the 2024 moose season, AITRC registered ten (10) participants. Of these:

- Eight (8) reported hunting activity
- Two (2) reported no hunting activity
- A total of 81 days were hunted by the 8 registrants, with an average of 13 days.
- No successful harvests were reported under the AITRC CHS during this season.

Fall 2023 Season

In the 2023 season, twelve (12) participants registered under the federal subsistence moose permit. Of these:

- Two (2) reported hunting
- Ten (10) reported not hunting
- A total of 15 days were hunted by the two (2) registrants, with an average of 7 days.
- No successful harvests were reported

AITRC-Administered Federal Community Harvest System: Number of Hunters, Days Spent Hunting, Proportion of Registrants that Hunted

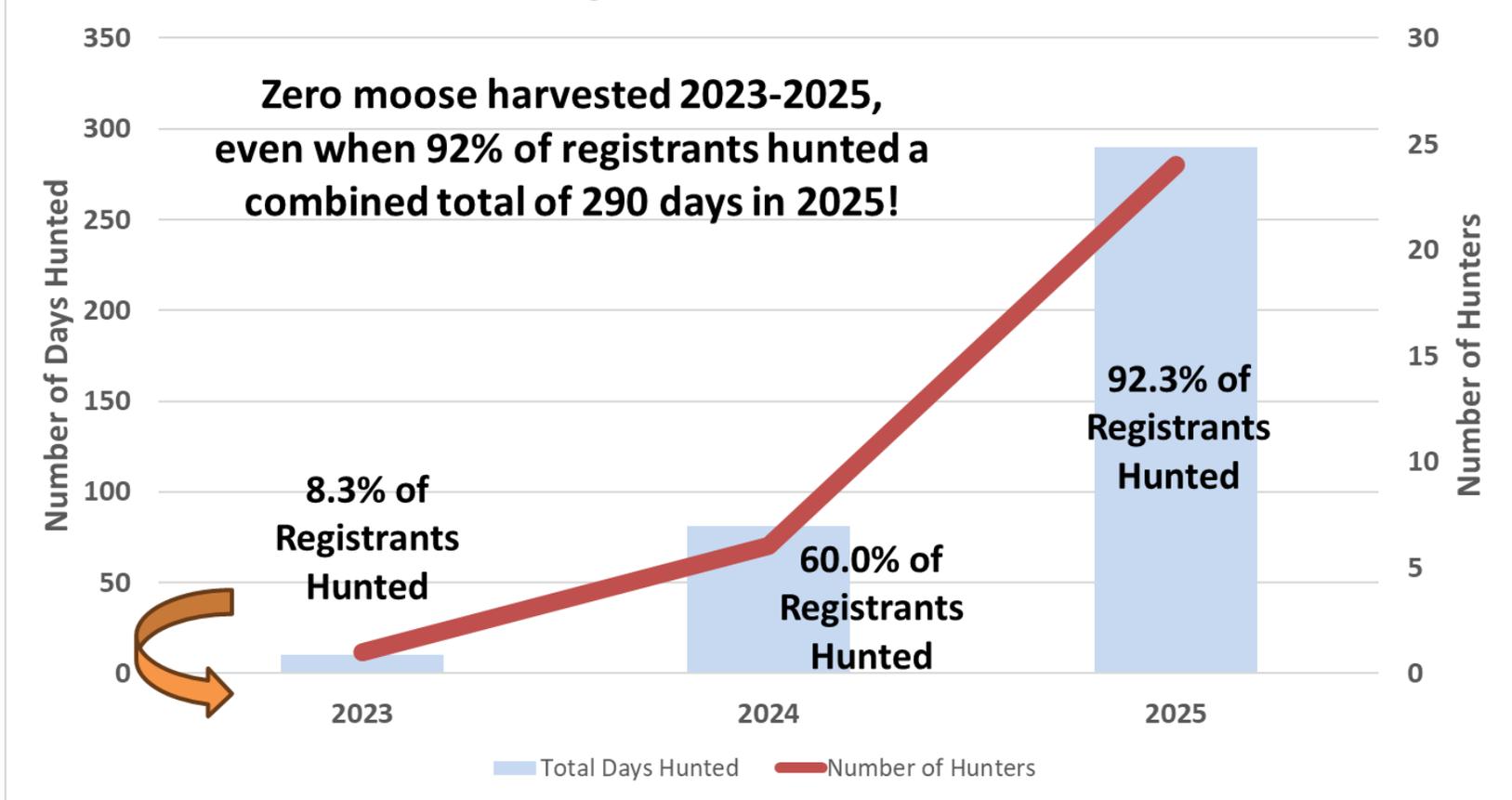


Figure 1. Summary of Participation in the AITRC-administered Federal Community Harvest System for Moose, 2023-2025.

CONCLUSIONS

The AITRC Community Harvest System continues to demonstrate progress as a cooperative federal–Tribal subsistence management framework. While harvest success remains limited, the program has:

- Increased participation over time
- Reduced administrative burden for federal agencies
- Enhanced communication and outreach to rural communities

Hunter feedback consistently identifies not seeing moose due to reduced population sizes, environmental conditions, access constraints, and increased competition as barriers to successful harvest. These observations underscore the importance of continued collaboration, adaptive management, and data-driven decision-making.

AITRC remains committed to administering the CHS in accordance with federal law, Indigenous values, and conservation principles. The Commission appreciates the cooperation of subsistence users and federal partners and looks forward to continued collaboration in future seasons and to continued increases in participation, with the hope that soon there will be successful harvests under the AITRC-CHS program.

RECOMMENDATIONS

In conclusion, federally qualified subsistence hunters participating in the AITRC Community Harvest System are not meeting their customary and traditional needs for moose in Game Management Units 11, 12, and 13. In response, the Ahtna Intertribal Resource Commission respectfully urges the Regional Advisory Councils and the Federal Subsistence Board to consider and adopt wildlife regulatory proposals WP26-28a and WP26-28b, which would extend the federal moose hunting seasons in GMUs 11 and 13.

AITRC offers these recommendations based on observed participation data and direct feedback from subsistence users. This information reflects the growing challenges rural hunters face due to climate change, including extended periods of warmer weather and shifting seasonal patterns. These changes appear to be affecting moose behavior, including later rut timing, which, in turn, reduces hunting success under the current regulatory framework.

In addition, AITRC submitted comments in support of proposals WP26-29 and WP26-30, which request a seasonal shift of the federal moose hunt in Game Management Unit 13. As demonstrated by the data, the majority of moose harvested by federally qualified users occur during the final week of the current season, indicating that current season timing does not align with on-the-ground conditions.

Overall, federally qualified subsistence users remain concerned that their customary and traditional harvest needs are not being met. Climate-driven changes, delayed rut timing, prolonged warm weather, and increasing access and safety challenges in many backcountry areas continue to limit successful harvest opportunities. Adjusting season length and timing would help ensure that federal subsistence regulations provide a meaningful rural preference required under ANILCA Title VIII, better reflect current environmental conditions, and support the customary and traditional subsistence needs of rural communities within the Ahtna Territory.