Wrangell-St. Elias National Park
Subsistence Resource Commission
Meeting Materials

Fall 2025

Wrangell-St. Elias National Park and Preserve
PO Box 439/Mile 106.8 Richardson Highway
Copper Center AK 99573
wrst_subsistence@nps.gov
(907) 822-5234

Wrangell-St. Elias National Park
Subsistence Resource Commission
Fall 2025 Meeting Materials

Table of Contents

Procedure for Consideration of Proposals[1]

1. Introduction and presentation of proposal/analysis

- SRC members can ask questions, but discussion comes later (after a motion).

2. Summary of any written public/SRC/RAC/AC comments

3. Public/advisory group/agency testimony

4. SRC recommendation

A. A motion is required for the SRC to take up a proposal for formal recommendation:
   - Motion should be stated in the positive to avoid confusion ("I move to support ____.")
     - If the choice exists, the motion should specify whether support is for the proposal "as written" or "as modified by OSM."
     - The main motion could be to support a modified version of the proposal ("I move to support Proposal ## with modification to _____.")
   - Motion must be seconded before discussion takes place.

B. Any modifications/amendments to the main motion – even friendly ones – also need to be in the form of a motion and follow the same process of a second and a vote.
   - Voting on friendly amendments can take place by unanimous consent[2].

C. SRC Discussion/Justification – the Chair states: "It has been moved and seconded to [restate motion]. Is there any discussion?"
   - Only SRC members may participate in the discussion once a motion is on the floor.
   - Discussion should include a justification for supporting/opposing the motion/proposal:
     - Is there a conservation concern? How will the recommendation address the concern?
     - Is the recommendation supported by substantial evidence such as biological information and traditional ecological knowledge?
     - Will the recommendation be beneficial or detrimental to subsistence needs and users?

5. Final action

- An SRC member calls for the question. In which case, the Chair should confirm that there are no objections or unanswered questions before moving on to the vote.
  - Or the Chair can say: "If there is no further discussion, the question is in order."
- The Chair restates the final motion, then holds the vote – "The motion before us is [state motion]. All in favor say I (or raise hand). All opposed, same sign (or say nay). Are there any abstentions[3]?"
  - Votes can be done by roll call if the vote appears close.
  - A simple majority vote (more than half) of those voting is required for a motion to pass.
    - Tied votes fail.
    - Abstentions do not factor into the vote count.

---

[1] The same general principles of motion, second, discussion, and voting also apply to other SRC actions.

[2] Unanimous Consent: On routine matters such as "friendly amendments," adopting an agenda or an election with a single candidate, voting can take place through "unanimous consent." In this case, the Chair may state "I am going to ask for unanimous consent. If there is no objection, the motion will be adopted." [Followed by a pause to allow anyone to object.] If there is no objection, the Chair then states "Since there is no objection, the motion is adopted." Silence signals agreement. If someone objects, they only need to state, "I object," and a vote will be held.

[3] Abstentions: To abstain is to refrain from voting. For example, if someone lacks knowledge of the topic (e.g., minutes from a prior meeting the member did not attend) or has a conflict of interest.

WRANGELL-ST. ELIAS NATIONAL PARK
SUBSISTENCE RESOURCE COMMISSION MEETING

AGENDA

(As of September 2, 2025)

September 25-26, 2025
Tok Chamber of Commerce Visitor Center,
Tok, Alaska, and by Microsoft Teams/Teleconference

Teleconference information:

- Number (not toll-free): +1 (202) 640-1187. Passcode: 478447917#
- Please mute your phone or computer when not speaking. If your phone doesn't have a mute button, you can mute and unmute yourself using "*6".
- Please do not put your phone on hold while called into the teleconference. The hold music is highly disruptive. If you need to take another call, please hang up and then call back in.
- If you get disconnected or have a bad connection, please hang up and call back in.

Public Comments:

- Public comments are welcome on action items under Old and New Business as well as during the general Public Comment period at the beginning of the meeting each day. The Commission appreciates hearing your concerns and knowledge.
- When possible, comments on action items are preferred immediately before SRC discussion of the specific topics, however, if you can't stay for the full meeting due to schedule constraints, comments on action items may be presented during the Public Comment period prior to SRC action on a topic.
- Please wait to be recognized by the SRC Chair before speaking.
- Time limits may be set to provide opportunity for all to testify and keep the meeting on schedule.

The meeting will be recorded for the official record.

The Superintendent of Wrangell-St. Elias National Park and the Chair of the Subsistence Resource Commission (SRC) announce a forthcoming meeting of the Commission.

*Asterisk identifies action item.

The following agenda items will be discussed:

1) Call to order (Chair)

2) SRC roll call and confirmation of quorum (Cohen)

3) Introduction of Commission members, staff, and guests (Chair)

4) Housekeeping announcements (Cohen)

5) Review and adoption of agenda* (Chair)

6) Review and approval of minutes from February 25-26, 2025* (Chair)

7) Superintendent's welcome and review of the Commission purpose (Superintendent)

8) Commission membership status (Cohen)

9) SRC Chair and Members' reports
   a. SRC member reports
   b. Chair's report

10) Superintendent's report (Superintendent)

11) Public Comments (available each morning)

Action Items:

12) Old business action items
   a. Review list of SRC management and research priorities* (Cohen/Pister)

13) New business action items
   a. SRC Chairs Workshop (Cohen)*
      - Identify topics and concerns to share

   b. Timely wildlife updates to inform SRC comments on proposals
      - Wrangell-St. Elias (Cutting)
      - Bureau of Land Management (Ketron)
      - Alaska Department of Fish and Game (invited)

   c. Review and comment on proposals to change federal subsistence wildlife regulations (Cohen/Cutting)*
      - WP26-01: Move delegated authorities into unit specific regulations
      - WP26-02: Prohibit take between civil sunset and sunrise in Units 1-5
      - WP26-12/13a/14a: Recognize customary and traditional uses of brown bears in Unit 6
      - WP26-13b/14b: Establish a Federal season for brown bears in Unit 6
      - WP26-16: Increase possession limit and extend hunting season for beaver in Unit 6
      - WP26-24: Increase the harvest limit of brown bears in Unit 11
      - WP26-25/26: Increase the harvest limit of brown bears in Unit 13
      - WP26-27: Modify the harvest limit for caribou in Unit 13C-E
      - WP26-28a: Modify the moose season in Unit 11
      - WP26-28b/29/30: Modify the moose season in Unit 13

- WP26-31: Close specific Federal lands (BLM) to non-federally qualified users for moose in Unit 13
- WP26-71: Increase the harvest limit of brown bears in Unit 12
- WP26-74: Modify the customary and traditional use determination for sheep in Unit 12
- WP26-77: Establish a customary and traditional use determination for wood bison in Units 12, 20, and 25E

d. Fisheries Resource Monitoring Program

14) Set tentative date and location for next SRC meeting* (Cohen)

Reports:

15) Reports related to old and new business
   a. Report on recent Federal Subsistence Board Work Session (Cellarius)

16) Wrangell-St. Elias National Park and Preserve and NPS Alaska Regional Office staff reports
   a. NPS Alaska Region Subsistence Program report (Jochum)
   b. Resource Stewardship and Science report (Pister)
   c. Wildlife report (Cutting)
      - Quota for Unit 11 winter moose hunt
   d. Fisheries report (Cohen)
   e. Subsistence/anthropology report (Cohen)
   f. Interpretation and Education report (Hernandez/Lodwick)

17) Other reports (*Invited/Time limit of 15 minutes unless approved in advance*)
   a. Ahtna Intertribal Resource Commission
   b. Alaska Department of Fish and Game
   c. Bureau of Land Management
   d. Tetlin National Wildlife Refuge
   e. Native Village of Eyak (Wissel and Piche)
   f. Prince William Sound Science Center (Rand)
   g. Sahara Iverson, UAF Graduate Student

18) Letter of recommendation to Governor and Secretary* (Chair)

19) Work session (comment on issues, prepare letters, etc.)* (Chair)

20) Adjourn meeting* (Chair)

DATE: September 25 and 26, 2025

TIME: 9 AM to 5 PM (or until business is completed) on September 25 and 9 AM until business is completed on September 26. If the SRC completes its business on September 25, the meeting will adjourn and no meeting will take place on September 26.

LOCATION: Tok Chamber of Commerce Visitor Center, Mile 1314 Alaska Highway, Tok, Alaska, and by teleconference via Microsoft Teams. If an in-person meeting is not feasible or advisable, the meeting will be held solely by teleconference via Microsoft Teams.

FOR FURTHER INFORMATION: Amber Cohen, Cultural Anthropologist, 907-822-7284, Wrangell-St. Elias National Park and Preserve, P.O. Box 439, Copper Center, Alaska 99573. Email: WRST_subsistence@nps.gov

SUPPLEMENTARY INFORMATION: The Subsistence Resource Commission is authorized under Title VIII, Section 808, of the Alaska National Interest Lands Conservation Act, Pub. L. 96-487, and operates in accordance with the provisions of the Federal Advisory Committee Act.

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.

DRAFT 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*[1], 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

[1] 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:**

Member Name:	Community:	Appointing Source:	Term Expires:
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 25th:
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 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 15th. Taking of a king salmon in the Chitina Personal Use fishery was prohibited until July 1st, 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 tit 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.

Wrangell-St. Elias National Park
Subsistence Resource Commission
Roster

As of August 2025

Name	Community	Appointing Source	Term Expires*
Bruce L. Ervin	Tok	Secretary of Interior	1/17/2027
Clint Marshall	Tazlina	Secretary of Interior	6/28/2026
Daniel E. Stevens	Chitina	Secretary of Interior	3/28/2026
Edward GreyBear (alternate)**	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
VACANT	Yakutat	Southeast RAC	10/27/2025
Sue Entsminger	Mentasta Pass	Eastern Interior RAC	11/04/2027

* All members serve for three-year terms. According to 54 U.S. Code § 100906(c), members continue to serve until re-appointed or replaced. However, RAC appointees must be current members of a RAC or AC for their appointments to be valid.

** Edward GreyBear serves as an alternate for Clint Marshall and Daniel Stevens.

List of Research and Management Priorities

Wrangell-St. Elias National Park Subsistence Resource Commission

Food Security:

- Thinking outside the box to protect and increase populations of important foods resources, in the following order of importance:
  1. Nelchina caribou
  2. moose
  3. sheep and goats
  4. Copper River sockeye and Chinook salmon
  5. game birds
- Decrease wolf, bear and coyote populations
- Introduce other food species, such as wood bison reintroduction

Management Priorities:

- Manage fires to benefit wildlife
  - Prescribed burns to benefit wildlife habitat
  - Consider wildlife habitat benefits in wildfire management decisions, i.e., let it burn when feasible.
  - Provide local communities with firewood, or at least subsistence firewood harvest opportunities, as part of hazard fuel reduction efforts (e.g., beetle killed trees) near communities.
- Impacts of eagle predation on harvested species (for example, sheep lambs, caribou calves, salmon).
- Effects of environmental change on subsistence resources and uses, for example:
  - Interaction between changes in migration patterns and access.
  - Changing river conditions (debris, high water levels) and impacts to fish wheel use and productivity

WP26–01 Executive Summary	
General Description	Wildlife Proposal WP26-01 requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters into unit-specific regulations for many hunts across Alaska and rescind the associated Delegation of Authority Letters. *Submitted by the Office of Subsistence Management*
Proposed Regulation	Please see subparts WP26-01a–WP26-01j
OSM Preliminary Conclusion	**Support** Proposal WP26-01 **with modification** to replace the term "coordination with" with "seeking input and considering feedback from". OSM also recommends modifications to WP26-01a – Southeast and WP26-01b – Southcentral. See the WP26-01a and WP26-01b analyses for the specific, regional modifications.
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	

WP26–01 Executive Summary	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	

WP26–01 Executive Summary	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**One support** See Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

DRAFT STAFF ANALYSIS
WP26-01

ISSUES

Wildlife Proposal WP26-01, submitted by the Office of Subsistence Management (OSM), requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and rescind the associated DALs.

This analysis serves as the "master analysis" and contains information consistent and relevant across all regions. Specific proposed regulations are grouped by region in separate analyses as follows: WP26-01a – Southeast; WP26-01b – Southcentral; WP26-01c – Kodiak/Aleutians; WP26-01d – Bristol Bay; WP26-01e – Yukon-Kuskokwim Delta; WP26-01f – Western Interior; WP26-01g – Seward Peninsula; WP26-01h – Northwest Arctic; WP26-01i – Eastern Interior; WP26-01j – North Slope.

While OSM transferred most authority verbatim from the DALs into the unit-specific regulations, some modifications were necessary for clarity or accuracy. These modifications are noted in the region-specific regulations contained in the separate, regional analyses.

The land management units (e.g. National Wildlife Refuges or National Parks and Preserves) required for coordination of management actions are specified, but not the specific position at each unit. Also, the Federal manager administering a Federal permit already has authority to set permit conditions, such as reporting periods. Therefore, specific authority to set permit conditions in a DAL was not transferred into unit-specific regulations. Permit conditions must be approved by OSM, which occurs annually as permits are updated, and in accordance with the current Office of Management and Budget (OMB) information collection authorization.

Additionally, every DAL contains boilerplate language permitting Federal in-season managers "to close and reopen Federal public lands to nonsubsistence hunting." This authority was not transferred into the unit specific regulations as it is more appropriately retained by the Federal Subsistence Board (Board). A few DALs contain authority to close Federal public lands to all users. This authority is specific to those hunts and therefore was transferred into the unit-specific regulations.

Finally, Federal regulations for delegated authority (§___.10(d)(6)) specify the Board may delegate authority "within frameworks established by the Board." To clarify this in the unit-specific regulations, the phrase "within the regulatory parameters set by the Board" was added, meaning that in-season managers may not announce seasons or harvest limits that are outside the bounds of the seasons or harvest limits established in codified Federal regulation.

Proponent statement

The proponent states that currently, many Federal in-season managers have been delegated authority by the Federal Subsistence Board to manage hunts through DALs. These DALs are administrative tools that the Board may issue or rescind at any time. Actions taken by Federal in-season managers under a DAL are classified as special actions and are therefore subject to regulatory requirements, including the obligation to hold a public hearing for any management action extending beyond 60 days, as outlined in §51.19. Special actions are intended to address temporary, emergency, or unforeseen circumstances. However, many of the in-season management actions currently implemented through wildlife DALs are routine and recurring, such as closing hunting seasons when harvest quotas are reached.

Including delegated authority for routine in-season decisions within unit-specific regulations is a more efficient approach than issuing special actions on an annual recurring basis. This method establishes a transparent public process for modifying delegated authority through the standard regulatory proposal system. This change in regulations will add approximately 10 pages of regulatory language. However, it reduces the administrative burden on Federal managers by eliminating the procedural requirements associated with special actions. Overall, this proposal enhances government efficiency by streamlining in-season management, promoting consistency across the State, and strengthening coordination and engagement with the State of Alaska.

The current approach to in-season management through DALs presents several operational inefficiencies:

- Public Hearing Requirements:
    - In-season managers must hold public hearings for actions lasting more than 60 days.
    - Even for routine actions like closing a season when a harvest quota is met, these hearings require time to coordinate, advertise, and conduct.
    - Attendance at these hearings is often low, making the effort disproportionate to the outcome.
- Tribal Consultation Requirements:
    - DALs require Tribal consultations “to the extent practicable.”
    - For routine matters, consultations are rarely practicable due to the time and effort needed to coordinate them.
- Subsistence Regional Advisory Council (Council) Involvement:
    - DALs require seeking Council recommendations when time allows and without causing undue delay.
    - This process can delay timely implementation and consumes both staff and Council resources for otherwise straightforward decisions.
- Confusing Language in DALs:
    - DALs include unclear guidance about “notifying proponents,” since these routine actions are treated as special actions under the current framework.

    - This adds unnecessary complexity to what should be simple, recurring management tasks.
- Challenges with Consistency and Enforcement:
    - High staff turnover makes it difficult to consistently follow and enforce all DAL-related requirements.
    - The administrative burden and complexity hinder effective and timely management.

Efficiencies and improved coordination could be gained by moving the delegations to regulations:

- Streamlined Regulatory Language:
    - Condenses approximately four pages of DAL requirements into a single paragraph within unit-specific regulations.
- Reduced Administrative Burden:
    - Eliminates the need for:
        - Public hearings
        - Tribal consultations
        - Regional Advisory Council (RAC) recommendations
        - Proponent notifications
    - Significantly reduces the time, effort, and resources required to implement routine in-season management actions.
- Improved Coordination and Consistency:
    - Establishes a clear, standardized process for routine in-season actions across Alaska.
    - Clarifies expectations for Federal in-season managers, Councils, and the State of Alaska regarding:
        - Coordination responsibilities
        - Communication protocols with rural subsistence users
- Simplified Oversight and Maintenance:
    - Reduces the Office of Subsistence Management's (OSM) workload by eliminating the need to maintain and update 61 DALs.
    - Prevents outdated guidance due to changes in hunt areas or other regulatory parameters.

Existing Federal Regulations

Note: Please see the "Proposed Federal Regulations" sections in each of the 10 separate, regional analyses. For brevity, the existing Federal regulations are not included in this analysis.

Relevant Federal Regulation

§ 51.10(d) Powers and Duties of the Board

* * * *

(6) The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements,

and open or close specific fish or wildlife harvest seasons within frameworks established by the Board.

Proposed Federal Regulations

See the separate, regional analyses WP26-01a – WP26-01j.

Existing State Regulations

None.

Note: As delegated authority exists only under Federal regulations, there are no corresponding State regulations. While there are corresponding State hunts for the Federal hunts affected by the delegated authority changes, for brevity, those regulations are not included in this analysis.

Regulatory History

Per regulation, the Board may delegate authority to agency field officials to manage hunts (see Relevant Federal Regulations section above). Delegating authority to local Federal land managers for in- or pre-season hunt management decisions is beneficial because they have a greater connection to and knowledge of affected wildlife resources, local subsistence users, and current on-the-ground situations, such as adverse weather affecting the resource and hunting opportunity, than the Board. They can also make decisions more expeditiously, such as closing a season when a harvest quota is approached to avoid overharvest.

The Board has delegated authority to Federal in-season managers in unit-specific regulations since at least 2000. For example, in the 2000-01 Federal subsistence regulations booklet, the Koyukuk/Nowitna National Wildlife Refuge manager had authority to announce a winter moose hunt in Unit 21D, Koyukuk Controlled Use Area. This delegated authority, as well as numerous other delegated authorities, are still in unit-specific regulations.

In the early 2000s, the Board began using DALs to allow more flexible management, since these letters can be quickly changed or withdrawn administratively without going through the full regulatory process. Since 2010, a table of DALs have been included at the end of the Federal subsistence wildlife regulations booklet. In 2010, all DALs were for the Southeast Region. Since then, the number of DALs has proliferated to 61 wildlife DALs across all 10 subsistence resource regions by 2024. While administrative actions, most existing DALs were created through Board action on regulatory proposals. Many DALs were created opportunistically as proposals were analyzed and authority was transferred out of existing regulations and into DALs as a housekeeping modification. Other DALs were created to manage new or modified hunts through regulatory proposals.

While the initial intent of issuing DALs was to increase flexibility and efficiency, an unforeseen consequence was increasing the administrative burden on Federal in-season managers and OSM. As mentioned in the proposal and in the proponent statement section of this analysis, any management

action taken through a DAL must be considered a special action subject to associated regulatory requirements such as holding public hearings and seeking Council recommendation if timing allows. The DALs also contain additional requirements for conducting tribal consultations, record keeping, and proponent notification. As these letters became more common over the past 15 years, they have been implemented inconsistently.

The administrative burden on OSM of maintaining 61 DALs has also become unwieldly. In preparation for submitting this proposal, WP26-01, OSM identified areas of overlap or inconsistency that will be resolved in the unit-specific regulations. For example, two DALs for the same area and species, Unit 9C caribou, had been issued to two different Federal managers. Unit 5B moose and Unit 6C moose have authority delegated in unit-specific regulations as well as in a DAL. Additionally, the boundary for a Unit 18 moose hunt was modified through Proposal WP24-19, but the corresponding DAL was not updated to reflect the hunt area boundary change.

In February 2025, the Board adopted WP25-01 with modification to change Nelchina caribou herd hunts in Units 11, 12 remainder, and 13. One of the changes was to move authority from DALs into unit-specific regulations. The analysis justified this change as, "rescinding the existing DALs and moving the delegated authority into unit-specific regulations is a programmatic initiative because it is more appropriate than issuing special actions for routine, annual management actions." This "testcase" was also supported by both the Eastern Interior and Southcentral Councils (OSM 2025).

Alternative(s) Considered

One alternative considered was replacing the term "coordination with" with either "consultation with" or "seeking input and considering feedback from." This replacement may provide more clarity on intended requirements, reduce confusion, and improve consistency in implementing delegated authority across the State as people may interpret "coordination with" differently.

Currently, all DALs contain the word "coordinate," while delegated authority currently in unit-specific regulations contain the word "consult." As government-to-government Tribal consultations are required when practicable in the DALs, the word "coordinate" was likely used to reduce potential conflation. Federal regulations establishing that the Board may delegate authority to Federal in-season managers (see Relevant Federal Regulations section) do not contain any requirements or guidance for managers to coordinate or consult with anyone. While Federal regulations regarding special actions in §51.19(b)(1)(i) stipulate, "*Prior to implementing a temporary special action, the Board will consult with the State of Alaska and the Chairs of the Regional Councils of the affected regions*," delegated authority in regulation are not special actions.

Regardless of the term used, OSM intends for in-season managers to do their due diligence in communicating their proposed in-season management actions and rationale to the required entities and to consider all feedback received in making any adjustment to the in-season action/rationale. However, OSM welcomes input from the Councils and the Board on further defining this requirement.

Discussion and Effects

OSM considers WP26-01 as mostly an administrative proposal. Adoption will not affect wildlife resources or subsistence opportunity. However, operational efficiency will increase as detailed in the proponent statement section. The administrative burden on Federal in-season managers and OSM will decrease, and routine management decisions can be made more expeditiously. This proposal also increases transparency as changes to delegated authority can be requested through the regulatory proposal process and by allowing the public to more easily reference what authority is delegated for particular hunts.

Previously, Councils and the public questioned how DALs could be rescinded or amended (SCRAC 2023a; 2023b). As an administrative function, Councils or the public could request changes verbally during Board meetings or in writing through letters or e-mails to the Board. However, as the delegation of authority is an administrative (not regulatory) action, the Board can still delegate authority to in-season managers if needed at any time through letters, although OSM expects any future DALs issued by the Board to be temporary (i.e. have an expiration date).

OSM anticipates another effect of this proposal going through an extensive review process by the Councils, Tribes and ANSCA corporations, the public, Federal land managers, and the Alaska Department of Fish and Game (ADF&G) will be increased understanding of the delegated authority process and consistency in its implementation across the State. All delegated authority requires coordination with several entities, including OSM. While not specified in regulation, OSM intends coordination to mean that the in-season manager does due diligence in communicating their proposed in-season action and rationale to the required entities and considers all feedback received in making any adjustment to the in-season action/rationale. Specifically, for OSM, in-season management actions should be coordinated, prior to implementation, with the OSM Wildlife Division Supervisor. Once the management action has been decided, notification should be sent to the OSM Wildlife Division Supervisor, the OSM Records Specialist for filing in the administrative record, and the OSM Outreach Specialist for posting on the OSM website and distributing to OSM regional contacts list.

Several other 2026 wildlife proposals propose modifications to delegated authority. The Board's action on those proposals may technically conflict with regulatory changes proposed by this proposal. However, OSM's intent is for action on those proposals to supersede action on this proposal as reconciling potential modifications is untenable and creates unnecessary regulatory complexity.

OSM PRELIMINARY CONCLUSION

Support Proposal WP26-01 **with modification** to replace the term "coordination with" with "seeking input and considering feedback from".

OSM also recommends modifications to WP26-01a – Southeast and WP26-01b – Southcentral. See the WP26-01a and WP26-01b analyses for the specific, regional modifications.

The draft regulations read:

Note: Only one example is included for brevity. However, the same change would be applied to all the delegated authorities being transferred into unit-specific regulations.

> **Unit 15—Goat**
>
> *Unit 15—1 goat by Federal drawing permit. Kids or nannies accompanied by kids may not be taken.* Aug. 10-Nov. 14
>
> ***The Kenai NWR manager after seeking input and considering feedback from ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season; set harvest quotas, number of permits issued, and sex restrictions; and define harvest zones.***

Justification

Adopting WP26-01 will improve government efficiency by eliminating many unnecessary steps and requirements for Federal land managers to make routine, annual management decisions; decreasing the administrative burden on OSM of maintaining 61 DALs; and enhancing public transparency by allowing changes to delegated authority through the regulatory process. Moving delegated authority to unit-specific regulations for routine management actions taken every year is more appropriate and expeditious than issuing special actions annually, which are intended for emergency, unforeseen circumstances and have additional regulatory stipulations.

Replacing the term "coordination with" with "seeking input and considering feedback from" clarifies the intended requirements of the in-season manager, reducing confusion and improving consistency in implementation across the State.

LITERATURE CITED

OSM. 2025. Staff analysis WP25-01. Pages 358–481 *in* Federal Subsistence Board Meeting Materials. Feb 4–7, 2025, in Anchorage. Office of Subsistence Management, DOI. Anchorage, AK.

SCRAC. 2023a. Transcripts of the Southcentral Alaska Subsistence Regional Advisory Council proceedings, Mar 15, 2023. Office of Subsistence Management, DOI. Anchorage, AK.

SCRAC. 2023b. Transcripts of the Southcentral Alaska Subsistence Regional Advisory Council proceedings, Oct. 3–4, 2023. Office of Subsistence Management, DOI. Kenai, AK.

WRITTEN PUBLIC COMMENTS

1. Ahtna Intertribal Resource Commission

DRAFT STAFF ANALYSIS
WP26-01I – EASTERN INTERIOR

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – Eastern Interior

Caribou

Unit 12—Caribou

Unit 12, that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 bull by Federal registration permit only	*Aug. 10-Sep. 30*

Federal public lands are closed to the harvest of caribou except by federally qualified subsistence users hunting under these regulations.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Tetlin NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set or open/close the season, announce the harvest quota, and the number of permits.

Note: The DAL for Fortymile caribou just specified coordination with United States Fish and Wildlife Service (USFWS) and NPS. OSM clarified that coordination should be with Yukon-Charley Rivers National Preserve and Yukon Flats NWR. OSM also added clarification that this delegated authority is for Fortymile caribou, which explains why the BLM Eastern Interior Field Office manager is required to coordinate with the other land management units specified. The Board delegated authority to one Federal in-season manager to streamline management of the Fortymile Caribou Herd across its entire range.

The DAL for Fortymile caribou just specified Unit 20F. However, given the current regulations and recent in-season management actions, the delegated authority should *not* apply to Unit 20F, north of the Yukon River. This DAL also delegated authority to modify or restrict methods and means. OSM is not aware of this authority ever being used and therefore, did not transfer it into the unit specific regulations.

Unit 20—Caribou

Unit 20E—up to 3 caribou, to be announced, by a joint State/Federal registration permit	*Fall season between Aug. 1 and Sep. 30, to be announced.*
The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict harvest limits, including sex restrictions, and season dates for Fortymile caribou.	*Winter season between Oct. 21 and Mar. 31, to be announced.*
Unit 20F, north of the Yukon River—1 caribou	*Aug. 10-Mar. 31*
Unit 20F, east of the Dalton Highway and south of the Yukon River—up to 3 caribou, to be announced, by a joint State/Federal registration permit.	*Fall season between Aug. 1 and Sep. 30, to be announced.*
The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict harvest limits, including sex restrictions, and season dates for Fortymile caribou.	*Winter season between Oct. 21 and Mar. 31, to be announced.*

Unit 25—Caribou

Unit 25C—up to 3 caribou, to be announced, by a joint Federal/State registration permit.	*Fall season between Aug. 1 and Sep. 30, to be announced.*
The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict harvest limits, including sex restrictions, and season dates for Fortymile caribou.	*Winter season between Oct. 21 and Mar. 31, to be announced.*

OSM PRELIMINARY CONCLUSION

Support Proposal WP26-01i.

Justification

See the WP26-01 master analysis.

Ahtna Intertribal Resource Commission

PO Box 613 – Glennallen, Alaska 99588
Phone: (907) 822-4466 Fax: (907) 822-4406

www.ahtnatribal.org
connect@ahtnatribal.org

June 30, 2025
Federal Subsistence Board
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Federal Subsistence Board Members,

On behalf of the Ahtna Intertribal Resource Commission (AITRC), thank you for the opportunity to submit comments on the proposed regulatory changes for the 2026–2028 Federal Subsistence Wildlife cycle WP26. AITRC represents the eight federally recognized Tribes of the Ahtna Region, working in partnership to protect and strengthen the Ahtna people's continued customary and traditional use of wildlife and natural resources across our territory.

The enclosed comments reflect the unified input of AITRC's member Tribes, professional staff, and our Fish and Wildlife Committee. These positions are grounded in generations of ecological knowledge and lived experience managing and relying upon species such as moose, caribou, bear, and Dall sheep. The proposals we support — and the conditions we recommend — aim to ensure subsistence resources remain accessible, sustainable, and managed in a way that reflects the priorities of the Indigenous communities who depend on them.

We appreciate the Board's continued engagement with Tribal voices and hope these comments assist in your deliberations. Thank you for your service and for considering the perspectives of AITRC and the Ahtna people.

Tsin'aen,

Karen Linnell
Executive Director
Ahtna Intertribal Resource Commission (AITRC)

WP26-01: Move delegated authority to letters in unit specific regulations

Position: Support with Conditions

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports the overarching goal of expanding delegated authority to local Federal land managers for timely decision-making on wildlife Special Action Requests. Delegating authority to in-region managers can help ensure more responsive management and quicker resolution of emergency or conservation-related issues, especially when resource conditions change rapidly.

However, AITRC recommends that any delegation of authority must be paired with meaningful consultation protocols. Specifically:

- Tribal Consultation: Local land managers must be required to consult with affected Tribes and Tribal consortia (such as AITRC) prior to acting on wildlife special action requests that impact subsistence species, timing, or access. This ensures local knowledge and cultural priorities are considered in decisions that affect Tribal citizens.
- Transparency and Accountability: All delegated actions taken by field staff should be clearly documented and made publicly available in a timely manner, with specific justifications. This transparency supports public trust and ensures that decisions align with ANILCA's intent to prioritize subsistence uses.
- Consistency Across Units: Delegated authority should be applied consistently across all relevant Federal units. Disparities in how or where authority is delegated can lead to uneven outcomes and confusion among users.
- Scope Limitations: We support the idea that delegated authority remains limited to certain actions (e.g., adjusting seasons, closing areas, or modifying harvest limits) and does not extend to more controversial regulatory changes that require full Board review.

AITRC **strongly recommends the inclusion of language requiring consultation with the Ahtna Intertribal Resource Commission (AITRC)** whenever delegated in-season decisions are made for wildlife populations that affect or occur within the Ahtna Traditional Use Territory.

This amendment would align WP26-01 with the precedent set by WP25-01, which AITRC supported, and which acknowledged the importance of consultation during Nelchina Caribou Herd management actions. Specifically, WP25-01 underscored:

- The necessity of responsive and adaptive in-season decision-making (e.g., harvest limits, season adjustments, sex restrictions);
- The critical role that AITRC plays as a regional subsistence management partner under the cooperative agreement established with the U.S. Department of the Interior;
- The inadequacy of static harvest regulations in the face of shifting wildlife population dynamics.

AITRC requests that the final language for WP26-01 include the following provision in the **Unit-Specific Regulations**:

"Unit 11—Moose

Unit 11, that portion south and east of a line running along the north bank of the Chitina River, the north and west banks of the Nizina River, and the west bank of West Fork of the Nizina River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain—1 bull by Federal registration permit. However, during the period Aug. 20 - Sep. 20, only an antlered bull may be taken.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Chugach National Forest, **Ahtna Intertribal Resource Commission,** and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas and season dates for the winter season."

"Unit 12

Caribou Unit 12, that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 bull by Federal registration permit only Federal public lands are closed to the harvest of caribou except by federally qualified subsistence users hunting under these regulations.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Tetlin NWR, **Ahtna Intertribal Resource Commission**, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set or open/close the season, announce the harvest quota, the number of permits, and the reporting period."

This consultation requirement reflects the importance of Indigenous knowledge systems, ensures transparent and inclusive decision-making, and advances the legal intent of ANILCA to prioritize rural and federally qualified users.

By formally embedding AITRC consultation into the in-season decision-making framework, WP26-01 will better support responsive conservation management while maintaining community trust and local relevance. We urge the Federal Subsistence Board to adopt this language as a condition of approving WP26-01.

In conclusion, AITRC supports this proposal, provided that Tribal consultation is mandatory and not discretionary. This change, if implemented with Indigenous participation, has the potential to improve both the responsiveness and cultural appropriateness of wildlife management decisions on Federal lands.

WP26-24: Unit 11 Brown Bear – Increase Harvest Limit from 1 to 2

Position: Support with Monitoring Conditions

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports the proposal submitted by the Eastern Interior Alaska Regional Advisory Council to increase the brown bear harvest limit in Unit 11 from one to two bears per regulatory year. This proposed change would provide greater flexibility and opportunity for federally qualified subsistence users.

Brown bears are an important part of Ahtna cultural traditions. However, AITRC recommends that any regulatory change to increase harvest opportunity be accompanied by the following conditions:

- Regular Population Monitoring: While no conservation concerns are currently identified, AITRC recommends that bear population data be reviewed at least every 3–5 years to assess harvest impacts and maintain long-term sustainability.
- Spatial Tracking of Harvest Pressure: Areas near the Nabesna Road and McCarthy Road are more accessible and subject to higher hunting effort. Targeted monitoring in these zones is advised to avoid local depletion or overharvest.
- Tribal Consultation: Future management actions related to brown bear harvest in Unit 11 should involve consultation with Ahtna Tribes and organizations. Local input is critical for adaptive management and maintaining cultural and ecological integrity.

Increasing the harvest limit aligns with the need for flexible and responsive subsistence regulations, especially as rural communities face rising costs of living, limited store-bought food access, and variable wildlife availability. With appropriate safeguards, AITRC views this proposal as a beneficial and balanced step forward.

WP26-25: Unit 13 Remainder – Increase Brown Bear Harvest Limit from 1 to 2 Bears

Position: Support with Continued Monitoring

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports the proposal to increase the brown bear harvest limit from one to two bears per year for federally qualified subsistence users in Unit 13. Allowing an increased harvest aligns Federal regulations with the State's updated limit and provides consistent opportunity.

Unit 13 encompasses a wide geography including critical subsistence areas around Gulkana, Tazlina, Copper Center, Chistochina, and Cantwell. Many of these areas see limited brown bear harvest pressure due to low accessibility, but in road-accessible zones, higher take may occur. Therefore, AITRC recommends the following:

- Monitoring by Subunit or Access Zone: While overall conservation concerns are minimal, harvest data should be reviewed with attention to areas where effort may be concentrated.
- Tribal Engagement in Data Collection: AITRC encourages greater inclusion of local Tribal observers and hunters in monitoring brown bear harvest data to better understand local population trends and ensure sustainable use.
- Cultural Protocols and Education: As harvest opportunity increases, AITRC supports outreach efforts to ensure respectful and complete use of harvested bears, in line with Ahtna values of gratitude and conservation.

Given the size of Unit 13 and the low percentage of Federal lands, we view this proposal as a reasonable adjustment that enhances food security while respecting the balance of human and ecological needs. We request continued coordination between Federal managers, AITRC, and Ahtna communities to ensure long-term success.

WP26-26: Unit 13A – Increase Brown Bear Harvest Limit from 1 to 2 Bears

Position: Support with Localized Oversight

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports the Southcentral Regional Advisory Council's proposal to increase the brown bear harvest limit in Unit 13 from one to two bears annually for federally qualified subsistence users. This change aligns Federal regulations with the State of Alaska's recent regulatory update (Board of Game Proposal 57) and removes an unnecessary discrepancy that could create confusion or limit access for federal subsistence users.

Unit 13A contains lands used by residents of Cantwell and surrounding Ahtna communities who have deep-rooted subsistence ties to the region. Increasing the harvest limit supports:

- Food Security and Cultural Continuity: Bears are used for both nutritional and cultural purposes, and an expanded harvest limit offers flexibility for families to meet annual needs or respond to traditional harvest opportunities.
- Regulatory Alignment: Matching Federal and State rules simplifies compliance and enforcement, particularly in mixed-jurisdiction areas such as Denali National Park and Preserve, where a sealing requirement and harvest cap remain in place.
- Low Conservation Risk: No biological concern has been identified for brown bear populations in this unit. Harvest remains relatively low, especially on federal lands, due to limited access.

AITRC recommends continued population monitoring, with attention to harvest activity near transportation corridors. We also encourage outreach to educate hunters on respectful and complete bear utilization. With these considerations in place, we view the proposal as a sensible adjustment that upholds the intent of ANILCA to prioritize rural and Indigenous subsistence users.

WP26-27: Unit 13 Caribou – Change Harvest Limit

Position: Support with Population Safeguards

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports WP26-27, which would modify the harvest limit in Unit 13 remainder from "2 bulls" to "up to 2 caribou" under the Federal registration permit (FC1302). This change provides consistency across Unit 13 and restores necessary in-season flexibility to the delegated Federal manager in response to real-time biological conditions and subsistence needs.

This proposal is aligned with AITRC's long-standing involvement in cooperative management of the Nelchina Caribou Herd and reflects both:

- Ecological Responsiveness: Allowing the manager to set the sex and number of animals, ensures more balanced and adaptive herd management. There are years when bull-to-cow ratios are skewed, and a strict "2 bulls" limit may be biologically inappropriate.
- Cultural and Practical Alignment: For many Ahtna families, harvesting two bulls may not always be viable based on travel costs, season timing, or group size. Granting the flexibility to harvest a cow under certain circumstances supports traditional harvest patterns, nutritional needs, and safety considerations — especially for elders and single-person hunting households.

We also note that the proposal maintains strong safeguards by requiring continued consultation with AITRC, ADFG, OSM, and RAC Chairs, preserving Indigenous oversight in any regulatory adjustment. AITRC

recommends approval of this change as it strengthens local and Tribal co-management while allowing the herd to be managed with integrity, both ecologically and culturally.

WP26-28a: Extend moose season in Units 11 to close on Sep 30.

Position: Support

Comment:
The Ahtna Intertribal Resource Commission (AITRC) strongly supports WP26-28a to extend the Federal moose hunting season in Unit 11 to close on September 30. Moose hunting is a critical subsistence activity for Ahtna families across the region, and this proposal addresses multiple barriers currently affecting harvest success:

- Climate Shift and Seasonal Timing: Warmer fall weather and delayed rut activity have made traditional August and early September hunts less effective. Extending the season provides additional days during a more biologically appropriate period and improves the chance of a successful harvest.
- Access and Safety: In many parts of Unit 11, particularly remote areas like the Slana River drainage and Wrangell-St. Elias backcountry — travel and water access become more reliable in late September. A longer season increases safe, effective hunting opportunities for elders, youth, and families who depend on this resource.
- Food Security and Cultural Continuity: The ability to provide moose meat remains foundational to Ahtna households. Extending the season strengthens food security and upholds traditional values of shared harvest and intergenerational hunting knowledge.

AITRC recommends continued use of antlered bull-only provisions as a biological safeguard during the extended period. We also encourage future efforts to explore additional late-season opportunities (e.g., limited winter hunts) in consultation with Ahtna Tribes.

With strong community support and no biological concerns, we urge the Federal Subsistence Board to adopt WP26-28a and improve the reliability and accessibility of this essential subsistence hunt.

WP26-28b: Extend moose season in Units 13 to close on Sep 30.

Position: Support

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports WP26-28b to extend the Federal moose hunting season in Unit 13 from the current September 20 closure to September 30. This modest extension directly benefits Ahtna communities throughout Unit 13 — including Gulkana, Tazlina, Copper Center, Cantwell, and Chistochina — by improving flexibility and increasing the chances of harvest success during the fall season.

Our support is based on the following key considerations:

- Seasonal Mismatch and Rut Timing: In recent years, the peak of the moose rut has increasingly occurred after September 20, likely due to climate-driven shifts in weather and photoperiod patterns. Extending the season provides a better alignment with rut activity, which is essential for effective and humane harvesting.

- Low Conservation Risk: Available biological data indicate that moose populations in Unit 13 are stable, and a season extension limited to antlered bulls does not pose a conservation concern. Continued monitoring and existing antler restrictions will ensure sustainable harvest levels.

Subsistence Priority and ANILCA Mandate: The proposal strengthens rural subsistence opportunities consistent with ANILCA Section 804, helping ensure that federally qualified users are able to meet their nutritional and cultural needs in the face of unpredictable environmental and economic pressures.

AITRC recommends adoption of WP26-28b and encourages continued coordination between Federal managers and local Tribes to assess harvest success, hunter access, and population trends throughout the extended season.

WP26-29: Unit 13 Moose – Shift Season 5 Days Later

Position: Support

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports WP26-29, which proposes shifting the Unit 13 Federal subsistence moose season five days later, from August 1–September 20 to August 5 – September 25. This change is justified by both harvest data and shifting ecological conditions and would better align Federal regulations with delayed rutting behavior and local harvest success patterns.

The data provided with the proposal clearly shows that the majority of moose are harvested by federally qualified users during the final week of the current season. A later start and end date would increase alignment with this peak activity window, especially as the timing of the rut continues to shift due to climate change.

WP26-30: Unit 13 Moose – Shift Season 10 Days Later

Position: Support

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports WP26-30, which proposes shifting the Unit 13 Federal subsistence moose season 10 days later, from August 1–September 20 to August 11–September 30. The proposal is backed by multiple years of harvest data showing that most federally qualified users are successful during the final 7–10 days of the current season. Shifting the season later increases the likelihood of success for Ahtna hunters and addresses shifting ecological patterns caused by climate change.

We also acknowledge that Unit 13 moose have become even more critical in recent years due to limited caribou access and ongoing food security challenges in rural communities.

WP26-31: Unit 13 Moose – Close BLM Lands to Non-Federally Qualified Users

Position: Strong Support

Comment:
The Ahtna Intertribal Resource Commission (AITRC) strongly supports WP26-31, which proposes a permanent closure of BLM-managed Federal public lands in Unit 13 to the harvest of moose by non-federally qualified users. This action builds upon the emergency closure granted under Wildlife Special Action WSA24-06, which applied to BLM lands in Unit 13B during the 2024 season due to high levels of competition, safety concerns, and reduced subsistence opportunity.

We urge the Federal Subsistence Board to adopt WP26-31 as a necessary and legally justified continuation of that emergency closure. The WSA24-06 justification clearly affirmed:

- That competition from non-local hunters on Federal lands has created "a significant disadvantage to federally qualified subsistence users,"
- The situation presents a public safety concern due to crowding and interference,
- And that closure was necessary to preserve the subsistence priority mandated under Title VIII of ANILCA.

These findings directly support the rationale for making the closure permanent and comprehensive, applying to all BLM lands in Unit 13, not just 13B.

Key Reasons for AITRC's Strong Support:

- Displacement and Unsafe Conditions: Ahtna subsistence users have repeatedly reported being pushed out of traditional hunting areas by large numbers of State-licensed hunters operating legally on Federal land. These conflicts compromise local families and severely limit their harvest success.
- Loss of Nelchina Caribou = Moose Dependence: With the curtailment of Federal caribou opportunity in Unit 13, moose have become the primary and often only large game option available to Ahtna citizens. The Board's own findings in WSA24-06 recognize that this shift intensifies subsistence needs for moose.
- Legal and Cultural Mandate: ANILCA Section 804 requires prioritizing rural and Alaska Native subsistence users when resources are limited or competition exists. Maintaining open Federal lands for non-qualified users directly contradicts this legal requirement and continues to harm Ahtna cultural practices and food security.
- Consistency with Precedent: The Federal Subsistence Board has previously closed lands under similar conditions in Units 23, 26A, and other regions where excessive outside pressure limited rural access. The justification for WSA24-06 meets or exceeds those same thresholds.

In summary, WP26-31 is a measured, lawful, and culturally essential response to conditions that AITRC and its member Tribes have raised for over a decade. We urge the Federal Subsistence Board to adopt this proposal in full to ensure that Federal lands in Unit 13 fulfill their legal and moral obligation to support Indigenous subsistence users.

WP26-71: Unit 12 Brown Bear – Increase Harvest Limit

Position: Support

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports WP26-71 to increase the brown bear harvest limit in Unit 12 from one to two bears per regulatory year for federally qualified subsistence users. This proposed change is consistent with the State of Alaska's existing regulation, provides greater regulatory clarity, and ensures that rural residents have equitable and flexible opportunities to meet their subsistence needs.

AITRC's support is grounded in the following considerations:

- Regulatory Consistency: The State already allows resident hunters to harvest two brown bears in Unit 12, and aligning Federal regulations reduces confusion for federally qualified users and enhances harvest reporting accuracy.
- No Conservation Concern: The proposal explicitly states that there are no known conservation issues with the brown bear population in Unit 12. With adequate biological monitoring and sealing requirements in place, this increase is sustainable.
- Limited Access = Low Risk of Overharvest: Much of Unit 12 includes remote terrain where harvest pressure is naturally low.

AITRC recommends continued harvest monitoring and Tribal consultation in the event of any future concerns but supports this regulation change as a reasonable and beneficial update to enhance subsistence use while safeguarding conservation.

WP26-74: Unit 12 Sheep – Modify Customary and Traditional Use Determination

Position: Oppose

Comment:
The Ahtna Intertribal Resource Commission (AITRC) respectfully opposes WP26-74, which seeks to broaden Customary and Traditional (C&T) Use Determinations for sheep hunting in Unit 12 beyond currently eligible rural communities. While the proposer raises understandable frustrations about inconsistencies in permit distribution and changing game patterns, the request does not meet the established criteria for C&T use as defined under Federal Subsistence Management regulations.

C&T determinations are intended to reflect long-standing, intergenerational patterns of use by rural communities, not generalized access or individual preference. The proposal lacks supporting documentation demonstrating a community-wide pattern of consistent, customary, and traditional sheep harvest from Unit 12 by the applicant's residence (Chitina). In contrast, current communities maintain well-documented histories of sheep harvest in Unit 12 based on:

- Intergenerational Knowledge Transfer: Families in these communities have hunted sheep across generations, often on foot or by traditional travel routes.
- Geographic Proximity: These communities lie adjacent to the Wrangell and Mentasta ranges where sheep are most accessible.
- Cultural Significance: Sheep hunting continues to be woven into local food systems, seasonal calendars, and ceremonial practices.

AITRC recognizes that changes in climate, wildlife abundance, and access infrastructure have altered wildlife patterns. However, expanding C&T eligibility should be based on regional tribal consultation, harvest documentation, and ethnographic records, not solely anecdotal accounts or personal narratives, no matter how heartfelt.

WP26-77: Units 12, 20, and 25 – Recognize Customary and Traditional Use of Wood Bison

Position: Support

Comment:
The Ahtna Intertribal Resource Commission (AITRC) supports WP26-77, which seeks to recognize the customary and traditional (C&T) use of wood bison by residents of Units 12, 20, and 25. While wood bison are currently listed as an experimental population under the Endangered Species Act and are not

yet open to harvest, the recognition of their historic and cultural significance to Alaska Native peoples is both timely and necessary.

AITRC's Rationale for Support:

- Documented Traditional Use: The proposal appropriately cites both oral histories and archaeological evidence demonstrating Alaska Native reliance on wood bison for subsistence purposes prior to their extirpation from the region. The interruption of use was due to external ecological decline — not a cultural shift — and therefore should not invalidate longstanding relationships between communities and this species.
- Cultural Revitalization: Acknowledging C&T use rights now ensures that Alaska Native and rural communities will be eligible to participate in any future harvest as part of cultural and nutritional revitalization efforts. This is critical to preserving Indigenous food systems, land-based practices, and language connected to bison hunting and use.
- Future-Proofing Access: Establishing C&T determinations ahead of delisting provides a proactive framework that ensures rural and Tribal communities will not be excluded once harvest becomes legally permissible.
- Respect for Regional Sovereignty: The inclusion of Units 12, 20, and 25 reflects the geographic scope of traditional wood bison range and use. AITRC encourages continued collaboration with Tribal organizations across these units to guide any future management frameworks, including education, ceremonial harvest, and conservation-based stewardship.

This proposal affirms that wildlife policy can both honor the past and prepare for a more inclusive future. We thank the Eastern Interior Alaska Regional Advisory Council for submitting this forward-looking proposal and urge the Federal Subsistence Board to adopt WP26-77.

Public Comments on WP26-02:
Units 1- 5; prohibit take between civil sunset and sunrise

Darlene Breitkreutz, Ketchikan, AK
WP26-02 - I totally agree with using this language "between civil sunset and sunrise" as I've witnessed many hunters out after dusk. There's many deer taken illegally that way.

Andy Deering, Craig, AK
WP26-02 – I support this proposal, however I recommend the following amendment: The new regulation should read "prohibit take between civil sunset and one half hour before sunrise." My reasoning for this is that no artificial lights are required to successfully bag big game one half hour before sunrise, therefore people should be allowed to take animals at that time. Similarly, it is possible to successfully harvest big game animals for a time after sunset without using lights, however problems may be encountered with finding wounded game in the darkness and therefore I don't support harvest hours after civil sunset.

WP26–16 Executive Summary	
General Description	Wildlife Proposal WP26-16 requests to increase the possession limit and to extend the season dates for beaver hunting in Unit 6. *Submitted by the Southcentral Alaska Subsistence Regional Advisory Council.*
Proposed Regulation	**Unit 6—Beaver Hunting** *Beaver: 1 beaver per day, ~~1~~ **3** in possession* — ~~*May 1–Oct. 31.*~~ ***July 1–June 30***
OSM Preliminary Conclusion	**Support** Proposal WP26-16
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**None.**

Draft Wildlife Analysis
WP26-16

ISSUE

Wildlife Proposal WP26-16, submitted by the Southcentral Alaska Subsistence Regional Advisory Council (Council), requests to increase the possession limit and to extend the season dates for beaver hunting in Unit 6. Specifically, WP26-16 requests to increase the daily possession limit from one beaver to three beaver and to extend the season dates from May 1—Oct. 31 to July 1–June 30.

Proponent Statement

The proponent states this change would align Federal hunting regulations more with traditional subsistence practices, which are opportunistic in nature. This would allow subsistence users to target larger beaver, rather than the indiscriminate harvest that occurs with trapping beaver.

Current Federal Regulations

Unit 6—Beaver Hunting

Beaver: 1 beaver per day, 1 in possession	*May 1–Oct. 31.*

Unit 6—Beaver Trapping

Beaver: No limit	*Dec. 1–Apr. 30*

Proposed Federal Regulations

Unit 6—Beaver Hunting

*Beaver: 1 beaver per day, ~~1~~ **3** in possession*	~~*May 1–Oct. 31.*~~ ***July 1–June 30***

Current State Regulations

Unit 6−Beaver Hunting

Unit 6	*no open season*

Unit 6−Beaver Trapping

Beaver: No limit	*Nov. 10–Apr. 30*

Extent of Federal Public Lands

Unit 6 is comprised of approximately 75% Federal public lands that consist of 54% U.S. Forest Service (USFS), 15% Bureau of Land Management (BLM), and 7% National Park Service (NPS) managed lands.

Customary and Traditional Use Determination

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for beaver in Unit 6. Therefore, all rural residents have a customary and traditional use determination for beaver in Unit 6.

Regulatory History

In October 1999, at their Arctic/ Western Region meeting, the Alaska Board of Game (BOG) adopted as amended Proposal 1, which reclassified beaver as a game animal and established hunting seasons in Units 18, 22, 23, and 26A. Then, in January of 2000 at their Statewide Cycle B meeting, the BOG reclassified beaver as a fur animal, which allowed them to be harvested with a State hunting license. The established State hunting seasons for beaver excluded Unit 6, which has remained unchanged since this time.

In 2000, the Federal Subsistence Board (Board) adopted Proposal P00-026, which aligned Federal beaver trapping regulations with State regulations by increasing the harvest limit from 20 beaver per season to ‘no limit’ and extending the season from Dec. 1–Mar. 31 to Dec. 1–Apr. 30. This proposal was adopted as part of the consensus agenda. The Board felt there would be no additional harvest from adopting this proposal, as most users already trapped under State regulations in the unit.

Also, in 2000 the Board adopted proposal P00-023, which established a beaver hunting season in Unit 6 with season dates of May1–Oct. 31, a harvest limit of one beaver per day, and a possession limit of one beaver. The Alaska Department of Fish and Game (ADF&G) commented that since the State did not have a beaver hunting season in Unit 6, that the regulation would only apply to Federal public

lands. The Board felt establishment of a hunting season would not adversely impact the existing beaver population while providing an additional subsistence opportunity for local users. Federal regulations for beaver hunting in Unit 6 have remained the same since.

In 2001, the BOG adopted Proposal 1 to change the Unit 6 beaver trapping season opening date from Dec. 1 to Nov. 10. ADF&G reported the beaver population could support additional harvest. The BOG agreed that a November 10 opening would align the beaver and land otter seasons in Units 5, 6, and 7 (BOG 2001). State regulations for beaver in Unit 6 have not changed since.

Federal and State beaver trapping regulations in Unit 6 both have harvest limits of 'no limit.' The Federal trapping season is Dec. 1-Apr. 30. The State trapping season is Nov. 10-Apr. 30.

Biological Background and Harvest History

Beaver are abundant in Units 6A, 6B, and 6C where there is an abundance of suitable habitat. Beaver density is lower in Unit 6D, where less habitat is available. Biological data for beaver in Unit 6 are extremely sparse as beaver are not surveyed outside of incidental observations that occur during moose surveys and observational reports from trappers. Since there is no statistical monitoring of beaver in Unit 6, population size and trends are unknown (Westing 2020). According to responses to the annual trapper questionnaires, which are voluntary and have a low reporting rate, beaver are scarce in Region II, which includes Units 6, 7, 8, 14C, and 15, from 2015-2023 with no change in population trend, except in 2018 when beaver were reported as common in Region II (Bogle 2025, 2023, 2022, 2021a, 2021b; Spivey 2020, 2019; Parr 2017, 2016).

Beaver are required to be sealed in Unit 6 under State and Federal regulations. Harvest data is collected through sealing records and assessed to understand the impact of harvest on the abundance of furbearers. Sealing of beaver hides dates back to 1927 when harvest was reported as very high (700 beaver in 1938) (Westing 2020). Trapping pressure declined starting in the 1940s with an annual average of 62 beaver harvested. Beaver harvest generally correlates with the number of successful participants. From 2002-2023, total beaver harvest from Unit 6 averaged 60 beaver/year, ranging from 24-116 beaver/year (**Table 1**). From 2002-2011, beaver harvest generally declined in correlation with declining numbers of successful participants. Since then, beaver harvest has fluctuated widely year-to-year, averaging 55 beaver/year along with fluctuating numbers of successful participants each year (**Table 1**, Westing 2020, 2025 pers. comm.). Overall, beaver harvest appears to be occurring at sustainable levels in Unit 6 (Westing 2020).

Traps are the most common method of take, accounting for 92% of reported beaver harvest in Unit 6 (**Table 1**). Most beaver reported as shot were killed under nuisance permits for airport or highway maintenance purposes. Most years, zero beaver were reported as shot in Unit 6. In recent years (2019-2023), only 0-2 beaver were shot each year (**Table 1**, Westing 2025, pers. comm.). Unit 6C receives the most harvest pressure of the Unit 6 subunits (57%-92% annually from 2012-2016), and residents of Unit 6 accounted for almost all of the beaver harvest. Peak beaver harvest generally occurs in November but can vary depending on winter conditions (Westing 2020).

Table 1. Harvest and method of take for beaver sealed in Unit 6, Southcentral Alaska, RY02–RY23 (Westing 2025, pers. comm.).

Regulatory year	Total harvest	Successful participants	Method of take		
			Shot	Trapped	Unknown
2002	116	17	10	106	0
2003	83	13	7	76	0
2004	109	15	8	99	2
2005	98	12	17	81	0
2006	49	10	17	32	0
2007	55	9	1	51	3
2008	46	6	9	37	0
2009	57	5	3	54	0
2010	31	6	0	31	0
2011	24	4	0	24	0
2012	38	8	0	38	0
2013	64	12	0	62	2
2014	42	9	0	42	0
2015	81	9	0	81	0
2016	37	9	0	37	0
2017	31	6	0	31	0
2018	65	10	0	65	0
2019	40	9	2	38	0
2020	83	14	0	83	0
2021	27	8	0	26	1
2022	91	12	1	88	2
2023	62	11	0	62	0
Average	**60.4**	**9.7**	**3.4**	**56.5**	**0.5**

Alternative(s) Considered

One alternative considered was to extend the Federal beaver trapping season in Unit 6 from Dec. 1–Apr. 30 to Nov. 10–Apr. 30 to align with the current State trapping season and provide additional subsistence opportunity under Federal regulations. However, this alternative is outside the scope of the proposal.

Discussion and Effects

If Proposal WP26-16 is adopted, federally qualified subsistence users may have up to three beaver in their possession at any time in Unit 6, and the hunting season for beaver in Unit 6 will be extended to year-round. This will allow subsistence users to harvest beaver opportunistically under a hunting license when they encounter them while participating in other subsistence activities on Federal public

lands in Unit 6. Increasing the possession limit will allow for users to harvest additional beaver if they are in the field for multiple days and unable to process their harvest immediately for long term storage.

No impact to the beaver population is expected from this proposal. Users may already harvest an unlimited number of beaver using a firearm under a trapping license Nov. 10–Apr. 30 under State regulations in Unit 6. Additionally, users may already harvest one beaver per day on Federal public lands in Unit 6 under a hunting license during the summer and early fall when the State and Federal trapping seasons are closed. Furthermore, very few beaver are harvested via firearm in Unit 6, and few trappers report harvesting beaver each year. Therefore, minimal increases to harvest are expected from this proposed regulatory change. Users would be able to shoot beaver Nov. 1-9, could possess three beaver at a time, which may benefit users on remote, multi-day trips, and could harvest beaver under a hunting license only, year-round.

OSM PRELIMINARY CONCLUSION

Support Proposal **WP26-16**

Justification

This proposal increases subsistence opportunity and there are no conservation concerns for beaver in Unit 6. Establishing a year-round hunting season for beaver aligns more with traditional methods of subsistence harvest. This will allow federally qualified subsistence users to harvest a beaver if the opportunity presents itself while they are participating in other subsistence activities.

LITERATURE CITED

BOG. 2001. Summary of Actions of Board of Game Meeting. March 2–12, 2001. Anchorage, AK.

Bogle, S. E. 2025. 2023 Alaska trapper report: 1 July 2023–30 June 2024. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2025-1, Juneau.

Bogle, S. E. 2023. 2022 Alaska Trapper Report: 1 July 2022-30 June 2023. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-3, Juneau.

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.

Bogle, S. E. 2021a. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

Bogle, S. E. 2021b. 2019 Alaska trapper report: 1 July 2019–30 June 2020. Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2021-2, Juneau.

Spivey, T. J. 2020. 2018 Alaska trapper report: 1 July 2018–30 June 2019. Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2020-1, Juneau.

Spivey, T. J. 2019. 2017 Alaska trapper report: 1 July 2017–30 June 2018. Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2019-3, Juneau.

Parr, B. L. 2017. 2016 Alaska trapper report: 1 July 2016–30 June 2017. Alaska Department of Fish and Game, Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2017-3, Juneau.

Parr, B. L. 2016. 2015 Alaska trapper report: 1 July 2015–30 June 2016. Alaska Department of Fish and Game, Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2016-1, Juneau.

Westing, C. 2020. Furbearer management report and plan, Game Management Unit 6: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-17, Juneau.

Westing, C. 2025. Unit 6 Area Biologist. Personal communication: e-mail. Alaska Department of Fish and Game. Cordova, AK.

WP26–24 Executive Summary	
General Description	Wildlife proposal WP26-24, requests to increase the brown bear harvest limit to 2 bears in Unit 11. *Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council*
Proposed Regulation	**Unit 11—Brown bear** *Unit 11—~~1~~ **2** bears* *Aug. 10—Jun. 15* See additional relevant regulations in analysis.
OSM Preliminary Conclusion	**Support**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 support** See Written Public comments on Wildlife Proposal and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Draft Wildlife Analysis
WP26-24

ISSUE

Wildlife Proposal WP26-24, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests to increase the harvest limit for brown bear in Unit 11 from one to two bears.

Proponent Statement

The proponent states that this proposal would provide additional opportunity for federally qualified subsistence users, and that there are no conservation concerns for brown bears in this unit.

Current Federal Regulations

Unit 11—Brown bear

Unit 11—1 bear	*Aug. 10—Jun. 15*

Proposed Federal Regulations

Unit 11—Brown bear

*Unit 11—~~1~~ **2** bear**s***	*Aug. 10—Jun. 15*

Relevant Federal Regulations

§100.25(j) Utilization of fish, wildlife, or shellfish.

(2) If you take wildlife for subsistence, you must salvage the following parts for human use:

(ii) The hide and edible meat of a brown bear, except that the hide of brown bears taken in Units 5, 9B, 17, 18, portions of 19A and 19B, 21D, 22, 23, 24, and 26A need not be salvaged;

Current State Regulations

Unit 11−Brown bear

Unit 11	*Residents and Nonresidents: One bear every regulatory year*	*Aug. 10—June 30*

Relevant State Regulations

5 AAC 92.220

You must salvage the entire hide (with claws attached) and skull of a brown/grizzly bear unless it was taken in (and not removed from) one of the subsistence hunt areas under a subsistence Registration permit.

Extent of Federal Public Lands

Unit 11 is comprised of approximately 89% Federal public lands that consist of 86% National Park Service (NPS), 2% U.S. Forest Service (USFS), and <1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Rural residents of Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, Tazlina, Tonsina, and Units 11 and 12 have a customary and traditional use determination for brown bear in Unit 11, north of the Sanford River.

Rural residents of Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Nabesna Road (mileposts 25-46), Slana, Tazlina, Tok Cutoff Road (mileposts 79-110), Tonsina, and Unit 11 have a customary and traditional use determination for brown bear in Unit 11, remainder.

Under the guidelines of Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.

Wrangell-St. Elias National Park has 23 resident zone communities: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake,

Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tazlina, Tanacross, Tetlin, Tok, Tonsina, and Yakutat.

However, these resident zone communities must also have a customary and traditional use determination for brown bears in the area to be eligible to hunt them within the park. In Unit 11 north of the Sanford River, the following communities meet both criteria: Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, Tazlina, Tonsina, McCarthy, Tanacross, Tetlin, and Tok. In Unit 11 remainder, the following communities meet both criteria: Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, Nabesna, Tazlina, Tonsina, and McCarthy.

Regulatory History

Prior to 1999, there was no Federal hunt for brown bear in Unit 11. In 1990, when the Federal subsistence management program began, State brown bear regulations for Unit 11 were not adopted into Federal regulations as brown bears were not considered a subsistence resource.

In 1999, the Federal Subsistence Board (Board) adopted Proposal P99-004 to establish a brown bear hunt in Unit 11 with a harvest limit of one bear Sept. 1–May 31. Brown bear populations appeared to be healthy and abundant, and establishing a season allows subsistence users to utilize this customary and traditional resource.

In 2003, the Board adopted Proposal WP03-13 to extend the Unit 11 brown bear season to Aug. 10–June 15 to match the current State season. Brown bear populations appeared to be stable, healthy and abundant. The proposal provided additional subsistence opportunity and decreased regulatory complexity by aligning State and Federal regulations.

In 2015, the Alaska Board of Game (BOG) adopted Proposal 93, allowing brown bears to be taken at registered bait stations in Unit 11. This was done to provide users additional opportunity and because there were no biological concerns for brown bears in Unit 11 (ADF&G 2015).

In 2016, the Board adopted Proposal WP16-18 as part of the consensus agenda to allow brown bears to be hunted over bait in Unit 11 Apr. 15–June 15. Both the Eastern Interior and Southcentral Councils supported the proposal to provide additional subsistence opportunity and because there were no conservation concerns. They commented any increases in harvest were expected to be small.

In 2018, the BOG adopted Proposal 112 as amended to extend the closing date of the brown bear hunting season in Unit 11 to June 30th. The amendment was to clarify the brown bear bait season and hunting season both end June 30. The Copper Basin Fish and Game Advisory Committee (AC) submitted the proposal to align the Unit 11 brown bear season with the adjacent Unit 12 season. ADF&G commented there were no conservation concerns and harvest was not expected to increase greatly (ADF&G 2018).

Current Events

In July 2025, the Board adopted deferred Wildlife Proposal WP24-01 as modified by OSM in its revised conclusion (February 2025). Proposal WP24-01 requested to allow the sale of brown bear hides. The OSM modification was that the hides of brown bears, with or without claws attached, may be purchased within the United States for personal use only and may not be resold. The hunter must request an OSM Customary Trade Permit and must return the permit to OSM. The modification also eliminated regulations requiring the skin of the skull and claws of brown bear hides to be retained at the time of sealing in certain areas. The Board adopted the proposal as modified in deference to nine Councils. However, this regulation cannot be implemented until the Office of Management and Budget (OMB) approves the creation and use of the new OSM Customary Trade Permit.

Biological Background

The State management objective for brown bears in Unit 11 is to provide the greatest sustained opportunity to participate in hunting brown bears (Hatcher 2023).

Brown bears are considered abundant in Unit 11. Frequent sightings of females with cubs suggest good productivity. Frequent observations of bears by ADF&G staff and the public suggest a healthy, abundant and well-distributed population. Based on incidental observations and harvest locations, brown bears inhabit most of Unit 11 except high-elevation glaciers. Overall, Unit 11 is considered good brown bear habitat because of the variety of vegetation types, large tracts of undeveloped land, and the presence of ungulates and numerous salmon streams throughout the unit (Stantorf 2015).

After den emergence, most bears, except females with cubs of the year, move into riparian areas to feed on newly emergent vegetation and over-wintered berries. They also scavenge carcasses of ungulates that died during winter, and prey on neonatal moose and caribou calves. Throughout the summer, brown bears in Unit 11 feed in various habitats. In late summer, bears generally move into subalpine habitats to feed on ripening blueberries. Bears feed on salmon in the numerous streams located throughout Unit 11 (Stantorf 2015).

In May 2019, NPS conducted an aerial survey for brown bears that covered much of Unit 11. Preliminary results suggest that brown bear densities within Unit 11 are consistent with recent density estimates in nearby units (Hatcher 2023).

Given the low yearly harvests, access limitations, and the large amount of habitat that serves as refugia due to a stricter eligibility for users per NPS regulations, hunting likely has no influence on brown bear numbers, composition, or productivity trends in the unit (Stantorf 2015).

Harvest History

No permits or harvest tickets are required to hunt brown bears in Unit 11 under State or Federal regulations, although all harvested bears are required to be sealed within 30 days of kill, providing

harvest information. Bait may be used to hunt brown bears under State regulations from Apr. 15–June 30 and under Federal regulations from Apr. 15–June 15.

Brown bear harvest in Unit 11 averaged 16 bears annually through the 1960s and 1970s but declined substantially after 1980 when Wrangell-St. Elias National Park and Preserve (WRST) was established, closing much of the unit to brown bear harvest. Harvest averaged only 6 bears annually through the 1980s and 1990s. Harvest increased after 1999, when a Federal brown bear season was established for Unit 11, opening the park to subsistence brown bear hunting, averaging 16 bears annually in the 2000s and 17 bears annually from 2010 through 2013 (Hatcher 2023).

From 2014-2018, reported brown bear harvest averaged 10 bears annually, which is the lowest 5-year average in 15 years (**Table 1**). Non-local residents and non-residents have historically harvested most of the brown bears in Units 11, averaging 75% of the reported bears harvested from 2014–2018 (Hatcher 2023). Local residents, defined as hunters living in Units 11 or 13, only harvested 1–5 bears annually over the same time frame, averaging 2.6 bears per year or 25% of the total reported harvest (**Table 1**; Hatcher 2023).

Other units (i.e. Unit 17) include management objectives to sustain an annual harvest composed of at least 50% males (Peterson 2023). While not a management objective for Unit 11, this metric is also monitored in Unit 11. From 2014 to2018, the percent females in the reported harvest averaged 34%, ranging from 14% to57%, which has been typical for Unit 11 since 1999 (**Table 1**; Hatcher 2023).

Given the unique land status and relatively difficult access in Unit 11, brown bear harvest pressure does not currently pose a concern for the sustainability of the population. Brown bear mortality occurring in defense of life or property (DLP) in Unit 11 typically ranges from 0 to 1 bear in a 5-year reporting period. Unreported human-caused mortality of brown bears in Unit 11 is likely minimal, given the relatively low level of hunting pressure (Hatcher 2023).

Table 1. Unit 11 Brown bear harvest by residency and percent females in the harvest. Local users are defined as hunters who live in Units 11 or 13 (Hatcher 2023; Rinaldi 2025 pers. comm).

Year	Local Resident	Nonlocal Resident	Nonresident	Total Harvest	% Female
2014	2	2	3	7	57
2015	5	3	8	16	31
2016	1	1	5	7	14
2017	3	2	6	11	45
2018	2	2	5	9	22
2019	1	5	4	12	50
2020	2	5	3	10	30
2021	4	6	8	18	44
2022	1	4	8	13	0.07
2023	6	3	5	14	35
2024	0	1	5	6	16
Average	2.45	3.09	5.45	11.18	31.28

Alternative(s) Considered

One alternative considered was to extend the Unit 11 brown bear season to close on June 30th to align with State regulations. Currently, the Federal brown bear season in Unit 11 is shorter than the State season. However, federally qualified subsistence users may already harvest brown bear until June 30th on some Federal lands under State regulations. WRST National Park, where State regulations do not apply, comprises 63% of Unit 11. This alternative was not further considered as it is outside the scope of the proposal.

Discussion and Effects

If Proposal WP26-24 is adopted, the brown bear harvest limit in Unit 11 will increase from one to two bears, increasing subsistence opportunity. This proposal would also increase regulatory complexity by misaligning State and Federal harvest limits for brown bear in Unit 11.

No impacts to the Unit 11 brown bear are expected from this proposal. Unit 11 is vast, remote, and experiences very low harvest pressure. While no formal population assessments have occurred, brown bear populations in Unit 11 are considered abundant, healthy, and well-distributed across the unit. The prohibition on the take of cubs and sows with cubs under both State and Federal regulations helps protect the reproductive component of the population and promote recruitment. Additionally, most of the brown bear harvest is by non-federally qualified users. Federally qualified subsistence users have historically only harvested a few brown bears from Unit 11 and must salvage both the meat and the hide; harvest is not expected to increase substantially from increasing the harvest limit to two bears. Indeed, ADF&G has not observed substantial increases in brown bear harvest in other units where the harvest limit was increased to two bears, including Units 12 and 16A, which are on the road system,

close to large population centers, and experience much higher harvest pressure than Unit 11 (ADF&G 2025).

OSM PRELIMINARY CONCLUSION

Support Proposal **WP26-24**

Justification

This proposal increases subsistence opportunity. There are no conservation concerns due to very low harvest pressure and brown bear populations that are considered abundant and healthy in Unit 11.

LITERATURE CITED

ADF&G. 2015. Alaska Department of Fish and Game staff comments. Central/southwest region IV proposals. Alaska Board of Game Meeting. 13-20 February, 2015. Wasilla, Alaska. Pgs. 81-82. http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=02-13-2015&meeting=wasilla. Accessed May 2015.

ADF&G. 2018. Tab 2: Alaska Department of Fish and Game staff comments. Central/Southwest Region IV proposals. Alaska Board of Game Meeting. February 16-23, 2018. Dillingham, Alaska. Pgs. 130-132. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2017-2018/csw/dept_comments.pdf. Retrieved June 4, 2025.

ADF&G. 2025. RC5: Department Reports and Comments on Proposals. Alaska Department of Fish and Game Staff Comments for Proposals 48, 57, and 58. Central/Southwest Region Proposals. Alaska Board of Game meeting. Wasilla, AK. January 10-17, 2025. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/dfg_comments-12.23.2024.pdf. Retrieved June 3, 2025.

Hatcher, H. L. 2023. Brown bear management report and plan, Game Management Unit 11: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-13, Juneau.

Peterson, C. 2023. Brown Bear management report and plan, Game Management Unit 17: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-17, Juneau.

Rinaldi, T. 2025. Personal communication: email. ADF&G. Anchorage, AK.

Stantorf, C. J. 2015. Unit 11 brown bear. Chapter 10, Pages 10-1 through 10–7 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission

WP26–25/26 Executive Summary	
General Description	Wildlife Proposals WP26-25/26 request to increase the harvest limit for brown bears in Unit 13 to 2 bears. *Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council* (WP26-25) *and Southcentral Council* (WP26-26)
Proposed Regulation	*Unit 13—~~2~~ 1 bears.* *Aug. 10—May 31* *Bears take within Denali National Park must be sealed within 5 days of harvest. That portion within Denali National Park will be closed by announcement of the Superintendent after 4 bears have been harvested.* See relevant federal regulations in analysis.
OSM Preliminary Conclusion	**Support**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Comment	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 support** See Written Public comments on Wildlife Proposal and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Draft Wildlife Analysis
WP26-25/26

ISSUE

Wildlife Proposal WP26-25, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) and Wildlife Proposal WP26-26, submitted by the Southcentral Council, request to increase the harvest limit for brown bears in Unit 13 from one to two bears.

Proponent statement

WP26-25

The proponent states this proposal would provide additional opportunity for federally qualified subsistence users. There are no conservation concerns for brown bear in Unit 13 and not much Federal land. The brown bear harvest limit in Unit 13 was recently changed to two bears under State regulations.

WP26-26

The proponent states that the Alaska Board of Game (BOG) recently adopted Proposal 57 to increase the brown bear harvest limit in Unit 13 under State regulations. This proposal would keep Federal and State regulations aligned, provide additional subsistence harvest opportunity, and prevent Federal regulations from being more restrictive than State regulations.

Current Federal Regulations

Unit 13—Brown bear

Unit 13—1 bear. *Bears take within Denali National Park must be sealed within 5 days of harvest. That portion within Denali National Park will be closed by announcement of the Superintendent after 4 bears have been harvested.*	*Aug. 10—May 31*

Proposed Federal Regulations

Unit 13—Brown bear

*Unit 13—**2** ~~1~~ bear**s**.*	*Aug. 10—May 31*
Bears take within Denali National Park must be sealed within 5 days of harvest. That portion within Denali National Park will be closed by announcement of the Superintendent after 4 bears have been harvested.	

Current State Regulations

Unit 13−Brown bear

Unit 13E, within Denali State Park	*Residents and Nonresidents: 2 bears every regulatory year*	*Aug. 10—June 15*
Unit 13, remainder	*Residents and Nonresidents: 2 bears every regulatory year*	*No closed season*

Relevant Federal Regulations

§100.25(j) Utilization of fish, wildlife, or shellfish.

(2) If you take wildlife for subsistence, you must salvage the following parts for human use:

(ii) The hide and edible meat of a brown bear, except that the hide of brown bears taken in Units 5, 9B, 17, 18, portions of 19A and 19B, 21D, 22, 23, 24, and 26A need not be salvaged;

§100.26(j) Sealing of bear skins and skulls.

(1) Sealing requirements for brown bear taken apply in all Units, except as specified in this paragraph (j). Sealing requirements for black bears of all color phases taken apply in Units 1-7, 13-17, and 20.

(2) You may not possess or transport from Alaska the untanned skin or skull of a bear unless the skin and skull have been sealed by an authorized representative of ADF&G in accordance with State or Federal regulations, except that the skin and skull of a brown bear taken under a registration permit in Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A need not be sealed unless removed from the area.

(3) You must keep a bear skin and skull together until a representative of the ADF&G has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin; however, this provision does not apply to brown bears taken within Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A and which are not removed from the Unit.

(*ii) If the skin or skull of a bear taken in Units 9B, 17, 18, and 19A and 19B downstream of and including the Aniak River drainage is removed from the area, you must first have it*

sealed by an ADF&G representative in Bethel, Dillingham, or McGrath; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.

Extent of Federal Public Lands

Unit 13 is comprised of approximately 15% Federal public lands that consist of 6% Bureau of Land Management (BLM), 6% National Park Service (NPS), and 2% U.S. Forest Service (USFS) managed lands.

Customary and Traditional Use Determination

Rural residents of Unit 13 and Slana have a customary and traditional use determination for brown bear in Unit 13.

*Under the guidelines of Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.*The communities of Cantwell, Lake Minchumina, Nikolai and Telida are recognized as subsistence resident zones for Denali National Park. However, resident zone communities must also have a customary and traditional use determination for brown bears in in the area to be eligible to hunt them within the park. Of the four resident zone communities, only Cantwell has a customary and traditional use determination for brown bears in Unit 13. This means that it is the only community that can hunt for brown bears in the portion of Denali National Park within Unit 13.

Regulatory History

Prior to 1999, there was no Federal hunt for brown bear in Unit 13.

In 1999, the Federal Subsistence Board (Board) adopted Proposal P99-021 as modified by the Southcentral Council to establish a brown bear hunt in Unit 13. The proposal requested a season of Sept. 1-May 31 with a one bear harvest limit. The modification was to extend the season to Aug. 1-May 31 to align with the existing State season, and to add the provision that bears taken in Denali National Park must be sealed within five days of harvest and the Park portion of the hunt would be closed after four bears were harvested. The Interagency Staff Committee and OSM staff analysis commented that bear populations in Denali National Park were lower, and while harvest was expected to be small due to access and low harvest pressure, the lower estimated bear population and lack of definitive data warranted the four bear quota. Federal regulations for brown bear in Unit 13 have not changed since.

In 2003, with the exception of Denali State Park, the Unit 13 brown bear hunting season was extended to year-round under State regulations (Hatcher 2023).

In 2013, brown bear harvest at bear-bait stations in Unit 13D was allowed under State regulations, and in 2015, brown bear harvest at bear-bait stations in the remainder of Unit 13 was allowed under State regulations (Hatcher 2023).

In 2025, the BOG adopted Proposal 57 to increase the brown bear harvest limit in Unit 13 to two bears under State regulations. Increasing the harvest limit to two bears also allows the sale of hides (with claws attached) and skulls after sealing. There are no conservation concerns for brown bears in Unit 13, and this is not expected to cause conservation concerns (ADF&G 2025c).

Current Events

In July 2025, the Board adopted deferred Wildlife Proposal WP24-01 as modified by OSM in its revised conclusion (February 2025). Proposal WP24-01 requested to allow the sale of brown bear hides. The OSM modification was that the hides of brown bears, with or without claws attached, may be purchased within the United States for personal use only and may not be resold. The hunter must request an OSM Customary Trade Permit and must return the permit to OSM. The modification also eliminated regulations requiring the skin of the skull and claws of brown bear hides to be retained at the time of sealing in certain areas. The Board adopted the proposal as modified in deference to nine Councils. However, this regulation cannot be implemented until the Office of Management and Budget (OMB) approves the creation and use of the new OSM Customary Trade Permit.

Biological Background

State management objectives for brown bears in Unit 13 include: 1) Reduce brown bear densities, and 2) Maintain a unit wide population of 350 independent brown bears (Hatcher 2023).

To address the BOG directive of reducing the brown bear population in Unit 13, a baseline study was conducted in western Unit 13A in 1998 that determined a brown bear density estimate of 21.3 independent bears per 1,000 km^2 (27.5 all bears/1,000 km^2), which represents 1,260 independent bears in Unit 13 (Hatcher 2023). Based on an aerial capture-mark-resight survey done on bears in 2011 in Unit 13A, there was a 25–40% reduction in brown bear densities compared to the baseline study, with 13.0 independent bears per 1,000 km^2 estimated in 2011 (ADF&G 2025a).

This study was repeated in 2022, although there was slight modification to the study area to improve sampling. This change makes comparability with 2011 difficult, but preliminary analyses suggest that the brown bear population in the Unit 13A study area has stabilized at a level lower than 1998 and shows some increase in the total number of bears since 2011. The density of independent bears (which are subject to hunting) have generally remained the same (2011: 13/1,000 km^2 vs 2022: 14.8/1,000 km^2) (ADF&G 2025a).

While the density estimate for the Unit 13A study area may not be applicable to all other parts of Unit 13, these estimates serve as an index for the brown bear population over time. The generally lower population density for brown bears compared to the 1998 baseline is believed to be applicable to the Unit 13 population as a whole and the population is no longer in decline (ADF&G 2025a).

The protection of females and dependent offspring within the study population appears to be a sufficient safeguard to avoid a sharp decline in population numbers given current harvest rates, and evidence suggests that as brown bear populations decline in Unit 13, they may also become more productive, presenting another safeguard against overharvest (Hatcher 2023, ADF&G 2025a).

Harvest History

No permits or harvest tickets are required to hunt brown bears in Unit 13 under State or Federal regulations, although all harvested bears are required to be sealed within 30 days of kill, providing harvest information. Bait may be used to hunt brown bears under State regulations from Apr. 15 – June 30, but not under Federal regulations.

Brown bear harvest in Unit 13 has increased substantially since the early 1960s when the average annual take was only 39 bears. Average annual harvest steadily increased through the mid-1990s as regulations gradually liberalized. In 1995, the Board of Game (BOG) established an objective to reduce the population of brown bears in Unit 13 by liberalizing harvest with the goal of improving survival of moose calves. Brown bear harvest stabilized from the mid-1990s through the mid-2010s. Harvest more recently has increased, which is likely associated with the allowance of brown bear harvest at bear-bait stations in Unit 13D beginning in 2013, and in the remainder of Unit 13 beginning in 2015 (Hatcher 2023).

From 2010 to 2023, brown bear harvest in Unit 13 ranged from 103 bears in 2014 to 153 bears in 2015 (when baiting was allowed unit wide), averaging 138 bears per year (**Table 1**). The most recent five-year average harvest (2018–2022) of 139 bears/year is similar to the previous five-year average of 142 bears/year (2013–2017), which was an increase over the previous five-year average of 135 bears (2008–2012) (ADF&G 2025a).

Harvest numbers are highest in Unit 13E and lowest in Unit 13C (**Table 1**). Differences in harvest levels between subunits can be attributed to multiple factors, including access, habitat, and overall subunit size. Current brown bear harvest pressure is highest in areas with road access to public lands, especially those areas that are within closer driving distance to large population centers such as Anchorage and the Mat-Su Valley (ADF&G 2025a).

The percent of females in the Unit 13 harvest has increased in recent years, both in overall harvest and in harvest of bears over bait (ADF&G 2025a). From 2010-2022, the percent of females in the total harvest ranged from 37%-54%, with the highest percent occurring in 2022. Other units (i.e. Unit 17) include management objectives to sustain an annual harvest composed of at least 50% males (Peterson 2023). The percent of females in the Unit 13 harvest has approached 50% for several years; however, 2022 is the only year when it exceeded 50%. While not an explicit objective for Unit 13, ADF&G

notes they will closely monitor the percent of female bears harvested, although it is not currently a conservation concern (ADF&G 2025a).

Table 1. Brown bear harvest in Unit 13 from 2010-2023. Figure from ADF&G presentation on Proposal 57 to the BOG at their January 2025 meeting (ADF&G 2025b).

Regulatory Year	GMU 13A	GMU 13B	GMU 13C	GMU 13D	GMU 13E	GMU 13 Total
2010	34	18	3	27	56	138
2011	19	18	5	21	57	120
2012	24	20	12	25	48	129
2013	28	22	8	54	47	159
2014	10	14	10	24	45	103
2015	20	25	16	37	55	153
2016	33	27	11	32	44	147
2017	26	31	7	30	54	148
2018	23	33	10	25	59	150
2019	28	28	12	27	39	134
2020	20	20	14	20	64	138
2021	23	26	16	30	37	132
2022	29	36	10	17	47	139
2023*	22	18	13	23	44	120
Average	24	24	10	28	50	138

*2023 data are preliminary

Alternative(s) Considered

One alternative considered was to extend the Unit 13 brown bear season to year-round to align with State regulations. Currently, the Federal brown bear season in Unit 13 is shorter than the State season. However, federally qualified subsistence users may already harvest brown bear year-round on most Federal lands (except Denali National Park) under State regulations. This alternative was not further considered as it is outside the scope of the proposal.

Another alternative considered was to except Denali National Park from the harvest limit increase. Current Federal regulations restrict brown bear harvest within the Park to four bears. Increasing the harvest limit to two bears within the Park means the season could close after two federally qualified subsistence users harvest two bears each, potentially decreasing opportunity for other federally qualified subsistence users. Conversely, if only a few federally qualified subsistence users typically hunt brown bears within the Park, this proposal could increase subsistence opportunity for those few users. However, current brown bear harvest from Denali National Park within Unit 13 is unknown.

Discussion and Effects

If these proposals are adopted, the brown bear harvest limit in Unit 13 would increase from one bear to two bears, increasing subsistence opportunity under Federal regulations. No impact on the brown bear

population is expected as users may already harvest two brown bears on most Federal public lands in Unit 13 under State regulations. The prohibition on the take of cubs and sows with cubs under both State and Federal regulations helps protect the reproductive component of the population and promote recruitment, safeguarding against current harvest pressure (ADF&G 2025b, Hatcher 2023).

Additionally, ADF&G has not observed substantial increases in brown bear harvest in other units where the harvest limit was increased to two bears, including Units 12 and 16A, which are also on the road system, adjacent to Unit 13, and close to large population centers. The harvest limit in Unit 12 increased to two bears in RY2024 and no hunter reported harvesting two bears in the fall of 2024. The harvest limit in Unit 16A increased to two bears in RY2018, and since then, only 10 hunters have sealed more than one bear in a year (ADF&G 2025b).

Adopting these proposals would also decrease regulatory complexity and confusion by aligning State and Federal harvest limits for brown bear in Unit 13 as directed by Executive Order 14153 3(b)(xxii) to "ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands."

OSM PRELIMINARY CONCLUSION

Support Proposals WP26-25/26.

Justification

These proposals increase subsistence opportunity and there are no conservation concerns. Additionally, they reduce regulatory complexity by aligning State and Federal harvest limits for brown bear in Unit 13.

LITERATURE CITED

ADF&G. 2025a. RC5: Department Reports and Comments on Proposals. Alaska Department of Fish and Game Staff Comments for Proposals 48, 57, and 58. Central/Southwest Region Proposals. Alaska Board of Game meeting. Wasilla, AK. January 10-17, 2025. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/dfg_comments-12.23.2024.pdf. Retrieved June 3, 2025.

ADF&G. 2025b. Tab. 5.2: Glennallen Area Proposals. Alaska Board of Game. Central & Southwest Region Meeting: January 10-17, 2025. Wasilla, AK. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/rc_4_tab_5.2.pdf. Retrieved June 3, 2025.

ADF&G. 2025c. Alaska Board of Game meeting recording. https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-10-2025&meeting=wasilla. January 10-17, 2025. Wasilla, AK.

Hatcher, H. L. 2023. Brown bear management report and plan, Game Management Unit 13: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-8, Juneau.

Peterson, C. 2023. Brown Bear management report and plan, Game Management Unit 17: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-17, Juneau.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission

WP26–27 Executive Summary	
General Description	Wildlife Proposal WP26-27 requests to change the caribou harvest limit in Units 13C, 13D, and 13E from "2 bulls" to "up to 2 caribou," and that authority to determine harvest limit and sex be delegated to the in-season manager. *Submitted by the Bureau of Land Management.*
Proposed Regulation	Please see Proposed Regulation section of the analysis.
OSM Preliminary Conclusion	**Support** proposal WP26-27 **with modification** to delegate additional authority to define harvest area and to clarify and simplify the regulatory language.
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 Support**

Draft Wildlife Analysis
WP26-27

ISSUE

Wildlife Proposal WP26-27, submitted by the Bureau of Land Management (BLM) Glennallen Field Office (FO), requests to change the caribou harvest limit in Units 13C, 13D, and 13E from "2 bulls" to "up to 2 caribou," and that authority to determine harvest limit and sex be delegated to the in-season manager.

Proponent statement

The proponent states this change is necessary to allow for more flexible management of caribou harvest during times of conservation concern. Currently the Federal in-season manager has authority to make in-season adjustments to harvest limits and sex restrictions in Units 13A and 13B, but not in the remainder of Unit 13 (**Figure 1**). Establishing a variable harvest limit will afford the in-season manager the ability to adjust harvest limits in response to fluctuations in the Nelchina Caribou Herd (NCH) population.

Current Federal Regulations

Note: These are the codified regulations adopted by the Federal Subsistence Board (Board) in February 2025 via adoption of WP25-01. They will be published in the Code of Federal Regulations once the fisheries final rule publishes in the Federal Register.

Unit 13−Caribou

Units 13A and 13B— up to 2 caribou by Federal registration permit only (FC1302)	*May be announced between Aug. 1–Sep. 30*
The Glennallen Field Office Manager, in consultation with the Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons, and set sex restrictions and harvest limits.	*May be announced between Oct. 21–Mar. 31*
Federal public lands in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations.	

Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.

Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)	*May be announced between Aug. 1–Sep. 30*
The Glennallen Field Office Manager, in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Denali National Park and Preserve Superintendent, Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons.	*May be announced between Oct. 21–Mar. 31*

Federal public lands in Unit 13C are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13D are closed to caribou hunting except by residents of Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina hunting under these regulations.

Federal public lands in Unit 13E are closed to caribou hunting except by residents of Cantwell, Chase, Denali Village (formerly McKinley Village), and the area between mileposts 216-239 of the Parks Highway (excluding residents of Denali Park Headquarters) hunting under these regulations.

Proposed Federal Regulations

Unit 13−Caribou

Units 13A and 13B— up to 2 caribou by Federal registration permit only (FC1302)	*May be announced between Aug. 1–Sep. 30*
The Glennallen Field Office Manager, in consultation with the Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons, and set sex restrictions and harvest limits.	*May be announced between Oct. 21–Mar. 31*
Federal public lands in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations.	
Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.	
Unit 13, remainder— ~~2 bulls~~ ***up to 2 caribou*** *by Federal registration permit only (FC1302)*	*May be announced between Aug. 1–Sep. 30*
The Glennallen Field Office Manager, in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Denali National Park and Preserve Superintendent, Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons, and ***set sex restrictions and harvest limits****.*	*May be announced between Oct. 21–Mar. 31*

Federal public lands in Unit 13C are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13D are closed to caribou hunting except by residents of Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina hunting under these regulations.

Federal public lands in Unit 13E are closed to caribou hunting except by residents of Cantwell, Chase, Denali Village (formerly McKinley Village), and the area between mileposts 216-239 of the Parks Highway (excluding residents of Denali Park Headquarters) hunting under these regulations.

Current State Regulations

Unit 13−Caribou

No open season.

Extent of Federal Public Lands

Unit 13 is comprised of approximately 15% Federal public lands that consist of 6% National Park Service (NPS) managed lands, 6% BLM managed lands, and 2% U.S. Forest Service (USFS) managed lands. Portions of Chugach National Forest, Denali National Park and Preserve, and Wrangell-St. Elias National Park and Preserve are in Unit 13.

Unit 13A is comprised of approximately 2% Federal public lands that consist of all BLM managed lands.

Unit 13B is comprised of approximately 18% Federal public lands that consist of all BLM managed lands.

Unit 13C is comprised of approximately 3% Federal public lands that consist of 2% BLM and 1% NPS managed lands.

Unit 13D is comprised of approximately 12% Federal public lands that consist of 9% USFS and 3% BLM managed lands.

Unit 13E is comprised of approximately 26% Federal public lands that consist of 20% NPS and 6% BLM managed lands.

Federal public lands within Denali National Park, as it existed prior to the passage of Alaska National Interest Lands Conservation Act (ANILCA) in December 1980, are closed to all hunting and trapping. Federal public lands within the ANILCA additions to Denali National Park, as well as Federal public lands within Wrangell-St. Elias National Park, are closed to hunting and trapping except to resident zone communities and those households holding subsistence use permits issued under 36 CFR 13.440. Most of the portion of Denali National Park located in Unit 13 is open to subsistence, and a smaller portion within Unit 13 is closed to subsistence. Denali National Preserve is open to subsistence.

BLM manages additional lands within Unit 13 that are selected for conveyance by the State of Alaska or Native Corporations and are not currently available for Federal subsistence because of the land selection status. If these land selections are relinquished, they would become Federal public lands under the authority of Title VIII of ANILCA.

Customary and Traditional Use Determination

Rural residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79–110), 13, 20D (excluding residents of Fort Greely), and Chickaloon have a customary and traditional use determination for caribou in Unit 13B.

Rural residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79–110), 13, Chickaloon, Dot Lake, and Healy Lake have a customary and traditional use determination for caribou in Unit 13C.

Rural residents of Units 11, 12 (along the Nabesna Road), 13, and Chickaloon have a customary and traditional use determination for caribou in Units 13A and 13D.

Rural residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters) have a customary and traditional use determination for caribou in Unit 13E.

Under the guidelines of Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.

The resident zone communities for Wrangell-St. Elias National Park (WRST) are: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway/Northway Village/Northway Junction, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and Yakutat. Resident zone communities must also have a customary and traditional use determination for caribou in the area to be eligible to hunt them within the park.

The resident zone communities for Denali National Park are Cantwell (limited to the area within a 3-mile radius of the Cantwell post office as shown on a map available at the park visitor center), Minchumina, Nikolai, and Telida. Because resident zone communities must also have a customary and traditional use determination for caribou in the area to be eligible to hunt them within the park, Cantwell is the only community that is eligible to subsistence hunt in the portion of Denali National Park in Unit 13E.

Additionally, Kevin Mayo, Blaine Mayo, and members of their households have individual customary and traditional use determinations for caribou in Unit 13 in areas managed by the National Park Service where subsistence uses are allowed. Names of individuals do not appear in regulation, but they are on a list maintained by Denali National Park and Preserve. These individuals have a long family history of hunting in Denali National Park and Preserve, but currently reside in Healy. Healy does not have a customary and traditional use determination for caribou in Unit 13.

Regulatory History

The following regulatory history is abbreviated for the purposes of this proposal. A full description of Federal and State regulatory actions relevant to the Nelchina Caribou Herd (NCH) can be found in the Office of Subsistence Management (OSM) analysis of Wildlife Proposal WP24-09 (OSM 2023).

The NCH is an important resource for many rural and non-rural users. Its proximity to the Glenn and Richardson highways enhances accessibility of the NCH for Anchorage and Fairbanks residents (Tobey 2003). A State Tier II system for NCH harvest was established in 1990 for Unit 13.

Between 1998 and 2008, the Board adjusted seasons, harvest limits, and opportunities to hunt on Federal public lands dependent on regulatory proposals, requests from the public, and herd assessment by managers. Season length and harvest limits changed in concert with the population estimates of the NCH. When population metrics allowed for additional harvest, requests were adopted to allow for more Federal harvest.

In 2009, the State of Alaska Board of Game (BOG) eliminated the State Tier II hunt but added two new hunts: a Tier I hunt and a Community Harvest hunt for residents of Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Copper Center. The harvest limit for each was one caribou (sex to be announced annually) with season dates of Aug. 10–Sep. 20 and Oct. 21–Mar. 31 and a harvest quota of 300 caribou, each. As the Federal harvest limit was two caribou, a federally qualified subsistence user could opt into the State community harvest system or use a State registration permit to harvest one caribou under State regulations and then get a Federal permit to harvest an additional caribou within Unit 13. However, State regulations stipulate that Tier I and community harvest system permit holders may not hunt moose or caribou under State or Federal regulations outside of Unit 13 and the Copper Basin Community Hunt area, respectively (ADF&G 2019a).

In 2012, the Board adopted Wildlife Proposal WP12-25, which added an additional nine days to the beginning of the fall caribou season in all of Unit 13 to provide more opportunity to federally qualified subsistence users. The season was extended from Aug. 10–Sep. 30 to Aug. 1–Sep. 30 (OSM 2012).

Between 2016 and 2019, the Board and Alaska Department of Fish and Game (ADF&G) both acted to expand hunting opportunity of the NCH as populations reached the upper end of management objectives. Special actions were approved to extend seasons and increase harvest limits.

In 2018, Wildlife Proposal WP18-19 was submitted by the Ahtna Intertribal Resource Commission (AITRC) requesting they be allowed to distribute Federal registration permits to Ahtna tribal members for the Federal caribou season in Unit 13. In addition, the proponent requested that the Ahtna Advisory Committee (which was to be formed) be added to the list of agencies and organizations consulted by the BLM Glennallen FO Manager, when announcing the sex of caribou taken in Units 13A and 13B each year. The Board voted to defer WP18-19 pending development of a framework for a community harvest system (OSM 2018).

In July 2019, the Board rejected Wildlife Special Action WSA19-03, which requested closure of Federal public lands in Unit 13 to caribou and moose hunting by non-federally qualified users for the 2019/20 season. The Board determined a closure was not warranted for conservation, continuation of subsistence uses, or safety reasons, as these populations were routinely monitored, and annual biological data was used to inform management plans and to establish sustainable harvest guidelines. Federal harvest rates remained consistent compared to annual overall harvest rates, and the Board believed the closure would not alleviate public safety concerns as non-federally qualified users would still be able to cross Federal public lands to access State and private lands.

In 2020, the Board adopted several proposals and special actions affecting caribou in Unit 13. First, in April, the Board adopted deferred proposal WP18-19 with modification, establishing a community harvest system for moose and caribou in Unit 13.

In July 2020, the Board acted on two Wildlife Special Action requests regarding caribou hunting in Unit 13, WSA20-01 and WSA20-03. WSA20-01 requested a continuous caribou season in Unit 13 from Aug. 1-Mar. 31 and that the harvest limit in Unit 13, remainder be changed from two bulls to two caribou for the 2020/21 and 2021/22 seasons. The Board approved the change in harvest limit to provide additional subsistence opportunity because there was no conservation concern. However, they did not approve the continuous season due to concerns of harvesting bulls during the rut when they may be unpalatable. This action was consistent with the Southcentral Alaska and Eastern Interior Alaska Subsistence Regional Advisory Councils' (Council) recommendations.

WSA20-03 requested closure of Federal public lands in Unit 13 to the hunting of moose and caribou by non-federally qualified users for the 2020/21 season. The Board approved closure of Federal public lands in only Units 13A and 13B to moose and caribou hunting by non-federally qualified users for the 2020/21 and 2021/22 seasons. The Board supported the closure for reasons of public safety and continuation of subsistence uses. The Board limited the closure to Units 13A and 13B because this is the area where the most overcrowding, disruption of hunts, and serious safety concerns have occurred. The Board extended the special action to the 2021/22 season as a regulatory proposal would not become effective until July 1, 2022, which reduced the administrative burden associated with processing additional requests.

Also in July 2020, the Board approved Wildlife Special Action WSA20-02 with modification regarding the AITRC administered community harvest system. In April 2022, the Board adopted Wildlife Proposal WP22-36, which codified these temporary regulations.

In 2022, the Board adopted Wildlife Proposal WP22-35, which established a may be announced season on the NCH in Unit 11 with a harvest limit of one bull by federal registration permit. This proposal also delegated authority to the superintendent of Wrangell-St. Elias National Park and Preserve to announce season dates, harvest quotas and number of permits, define harvest areas and to open and close the season. This season was established because the NCH migrates through Unit 11, and this hunt could allow for some subsistence harvest opportunity within the unit. However, precautions needed to be taken, as this area was closed to the harvest of caribou to protect the Mentasta Caribou Herd, which is experiencing conservation concerns. To date, this season has not been announced.

In 2022, ADF&G took action to lessen a steep decline in the NCH population by changing harvest limits. Severe winter conditions resulted in a low population estimate with a lower-than-expected harvestable surplus. ADF&G established the resident caribou harvest limit in Unit 13 as one bull, with a harvest quota of 1,000 bull caribou (615 allocated to State harvest and 385 for Federal harvest). These low harvest quotas led to both State registration hunts being closed by Emergency Order (EO) when quotas were exceeded (ADF&G 2022b & 2022c). ADF&G requested the BLM in-season manager restrict harvest under Federal regulations to bulls only, which the manager opted not to do.

On June 30, 2023, the State announced the closure of all NCH hunts for the 2023/24 season via EO R4-01-23. This EO closed the two Tier I registration hunts (RC561 and RC562) and the community subsistence hunt (CC001). The resident youth hunt (YC495) and resident drawing hunt (DC485) were not offered during the drawing application period of 2022 (ADF&G 2022a), as ADF&G determined the NCH population was too low to offer these opportunities. Since these are all registration and drawing permits, ADF&G does not have to issue an EO to close these hunts each season; they just do not offer the permits. Hence, the State hunts will be closed until ADF&G decides there is a harvestable surplus and offers Tier II permits (BOG 2025). Indeed, the State hunt has remained closed since 2023.

Starting in July 2023, the Board acted on several special action requests regarding caribou in Unit 13. Adoption of WSA23-01/03 closed all caribou hunting during the fall season in Unit 13. WSA23-01 was submitted by ADF&G and WSA23-03 was submitted by the BLM. In October, adoption of WSA23-04 with modification, submitted by the BOG, closed the winter caribou hunts in Units 11, 12, and 13. WSA23-02 was submitted by ADF&G at the same time, but was not acted upon due to WSA23-04 being more inclusive of NCH harvest areas. All of these requests asked to close the hunts due to substantial conservation concerns over low NCH population estimates. The Board modified WSA23-04 to provide an exception for traditional religious ceremonies and cultural/educational program permit harvest.

In April 2024, the Board adopted Wildlife Proposal WP24-09, which delegated authority to the BLM Glennallen FO manager to manage the Federal caribou hunts in Units 13A and 13B and added AITRC to the list of entities for consultation via a delegation of authority letter. It also changed the Units 13A

and 13B harvest limits from “two caribou” to “up to two caribou.” Adoption of WP24-09 expanded the in-season manager’s authority, allowing for greater management flexibility and more timely responses to changing hunt and herd conditions.

In June 2024, the Board considered WSA24-02, submitted by the WRST Subsistence Resource Commission, which requested closure of Federal public lands in Units 11, 12 remainder, and 13 to caribou hunting by all users for the 2024/25 regulatory year and asked that an ANILCA §804 user prioritization analysis be conducted for the NCH. The Board also considered WSA24-03, submitted by the BLM Glennallen FO, which made the same request. Both requests were due to continued decline of the NCH population. The Board approved WSA24-02 with modification to provide exceptions for traditional religious ceremonies and cultural/educational program permit harvest and to postpone a decision on the §804 user prioritization analysis until the February 2025 Board fisheries regulatory meeting.

In January 2025, the BOG considered Proposal 49, requesting a six-year closure to harvest of Nelchina caribou, or until the herd reaches the midpoint of population objectives. The ADF&G uses an adaptive management strategy to allow for harvest when a harvestable surplus is available. The BOG felt this was the best management strategy for the NCH rather than a six-year moratorium on harvest and opposed this proposal.

In February 2025, the FSB adopted WP25-01 as modified by the Southcentral and Eastern Interior Alaska Councils. This proposal was submitted by OSM in response to the Board’s action on WSA24-02, which postponed a decision on the §804 analysis. Proposal WP25-01 requested conducting a §804 user prioritization analysis that specified which communities would be eligible to hunt for Nelchina caribou, changing all Nelchina caribou hunts in Units 11, 12, and 13 to “may be announced” seasons, and delegating authority to Federal in-season managers to manage the hunts in unit-specific regulations. The modification added communities to the OSM preliminary conclusion, which the two Councils felt relied on the NCH.

Biological Background

The NCH calving grounds and summer range both lie within Unit 13. The rut generally occurs within Unit 13 from late September through mid-October. Recently, the NCH has shown much annual variability in their winter range, with portions of the herd overwintering in Units 11, 12, 13, 20E, or sometimes even migrating into Canada (ADF&G 2023b, Hatcher 2024, pers. comm.). While the calving season and location of the NCH calving grounds remains static, use of other seasonal ranges varies with resource availability and snow cover (Schwanke and Robbins 2013). When the NCH overwinters in Unit 20E, competition with the Fortymile Caribou Herd (FCH) may occur.

State management goals and harvest objectives are based on the principle of sustained yield (maximum harvestable amount while maintaining herd viability) (Robbins 2015). Since the mid-1990s, ADF&G has experimentally managed the NCH using hunter harvest to maintain the herd below carrying capacity of the range. This experimental management regime proves difficult to maintain if annual composition or count data are not collected. Harvest quotas in subsequent years must be adjusted to

compensate for miscalculations in abundance made from a lack of data (Hatcher and Robbins 2021). The goal is to prevent overuse of the NCH range and large swings in abundance, which may lead to drastic declines and extended recovery periods. ADF&G's management objectives are to maintain a fall, post-hunt population of 35,000–40,000 caribou, with minimum ratios of 40 bulls:100 cows and 40 calves:100 cows, and to provide for the harvest of 3,000–6,000 caribou annually (Hatcher and Robbins 2021).

Despite the stringent harvest management, population of the NCH has fluctuated over time, influenced primarily by harvest (Schwanke and Robbins 2013). Between 2003 and 2024, the NCH summer minimum count and fall population estimates ranged from 6,983–53,500 caribou and averaged 35,218 caribou (**Figure 2, Table 2**). The herd has exceeded State population objectives many times, and harvest regulations have been liberalized to quickly reduce the population to preserve habitat conditions. NCH population increases may be a result of a series of mild winters, favorable growing seasons, relatively low harvest rates (Hatcher 2024, pers. comm.), as well as the Intensive Management programs for the FCH in Unit 12 and for moose in Unit 13 with wolf predation control, as there may be less predation on Nelchina caribou and neonate calves (ADF&G 2023c). Brown bear predation is usually a more frequent source of mortality on caribou neonates, whereas wolf predation typically occurs later in the caribou life cycle. While brown bears are not a target of the Intensive Management program in either Unit 12 or 13, harvest regulations have been loosened to allow for increased harvest (ADF&G 2023b). Both wolf and brown bear populations are currently low enough that further removal would not positively affect the caribou population (ADF&G 2023b). The Unit 13 predator control program was initiated in 2000 and is currently active. The Unit 12 program was originally established in 2004, although this program is currently inactive (ADF&G 2023c).

In 2019, the NCH summer minimum count peaked at 53,500 caribou (ADF&G 2019b). The NCH abundance has declined precipitously since then to only 6,983 caribou (minimum count estimate) in October 2023 (**Figure 2**), which is the lowest estimate since 2003 (ADF&G 2023a, 2024a). ADF&G also performed a Rivest estimate from the 2023 summer minimum count and estimated 8,344 animals (ADF&G 2024b). In July and October 2024, the minimum count increased to 12,098 caribou and 11,738 caribou (12,526 Rivest), respectively, which is still well below management objectives (ADF&G 2024a &2024b). Factors contributing to this recent decline are believed to include severe winters, late springs, and early/deep snows across the range of the NCH from 2021–2023. The severe and variable winter weather, such as deep snow, led to higher than usual overwinter mortality of both adults and calves for two winters in a row (2021/22 and 2022/23) (Hatcher 2024, pers. comm., ADF&G 2023b). Later spring thaws may delay migration to the calving grounds (ADF&G 2017). The late arrival of spring in 2021 and 2022 may have affected caribou migrations, as calving occurred later than normal in both springs. The FCH, which shares winter range with the NCH, also calved later than normal in the spring of 2022 (ADF&G 2023b). The winter of 2023/24 saw NCH caribou wintering outside of the Copper Basin, where there was much less snow, and the herd was able conserve energy by not having to travel great distances. While calf survival rates were low from 2021-2023, hampering recovery, they were relatively high for 2024, with an estimated 27% surviving to spring 2024 (ADF&G 2023b, 2024b).

Bull:cow and calf:cow ratios have fluctuated greatly over time. Between 2003 and 2024, the fall bull:cow ratio ranged from 23–64 bulls:100 cows and averaged 38 bulls:100 cows, with two of the three lowest estimates occurring in July 2023 and October 2024 (**Table 2**). The summer observation was used in the fall 2023 estimate as the fall composition results were inconclusive, because the caribou were still sexually segregated during the survey (ADF&G 2024a). The fall calf:100 cow ratio for the same timeframe ranged from 3–55 calves:100 cows and averaged 35 calves:100 cows (**Table 2**). The composition survey conducted in October 2024 showed a substantial increase in the calf:cow ratio from the low in 2023, and increased calf weight and height, which may lead to increased recruitment for 2025.

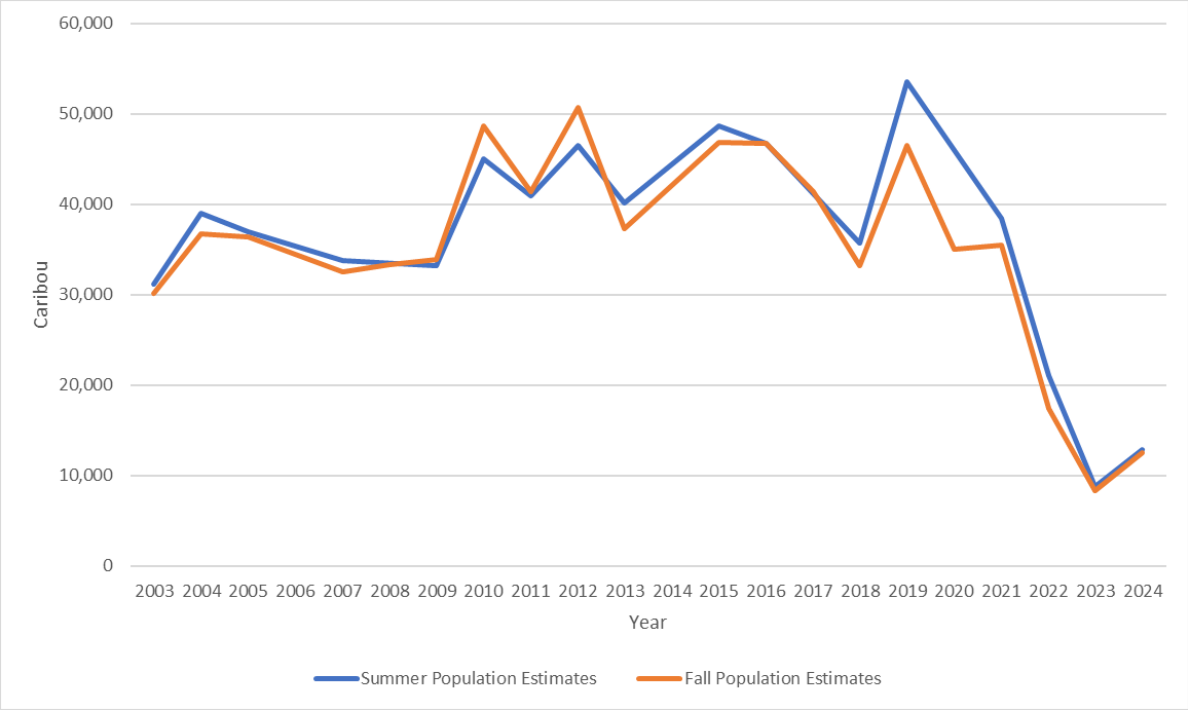


Figure 2. Summer and fall population estimates for the NCH (ADF&G 2024a & 2024b). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

Table 1. Population estimates and fall composition metrics of the NCH (Tobey and Kelleyhouse 2007; ADF&G 2008, 2010b, 2019a, 2023a, 2023b, 2024a, 2024b; Schwanke 2011; Schwanke and Robbins 2013; Robbins 2015, pers. comm.; Rinaldi 2019, pers. comm.; Hatcher 2021, pers. comm.).

Year	Bulls:100 cows[a]	Calves:100 cows[a]	Summer Estimates[b]	Fall Estimates
2003	31	35	31,114	30,141
2004	31	45	38,961	36,677
2005	36	41	36,993	36,428
2006	23[c]	40[c]	-	-
2007	34	35	33,744	32,569
2008	39[c]	40[c]	-	33,288
2009	42	29	33,146	33,837
2010	64	55	44,954	48,653
2011	58	45	40,915	41,394
2012	57	31	46,496	50,646
2013	30	19	40,121	37,257
2014	42	45	-	-
2015	36	45	48,700	46,816
2016	57	48	46,673	46,673
2017	35[c]	35[c]	-	41,411
2018	40	20	35,703	33,229
2019	32	41	53,500	46,528
2020	28[c]	17[c]	-	35,000
2021	38	45	38,400	35,500
2022	26	16	21,000	17,433
2023	25[d]	3	8,823	6,983
2024	26	41	12,910	12,526
Average	38	35	36,009	35,149

[a] Fall composition counts

[b] Summer photocensus

[c] Modeled estimate

[d] Summer ratio

Harvest History

The NCH is a popular herd to hunt and experiences heavy harvest pressure due to its road accessibility and proximity to Fairbanks and Anchorage. Harvest quotas are adjusted annually in response to population estimates to achieve State management objectives and keep the herd within sustainable levels (Schwanke and Robbins 2013). In recent years, caribou migration patterns have made caribou largely unavailable on Federal public lands during the fall Federal season (Aug. 1– Sep. 30) with their presence peaking during October when the season is closed for the rut (BLM 2020, OSM 2023).

The Mentasta Caribou Herd range partially overlaps with the NCH range. The herd traditionally calves and summers along the northern and western slopes of the Wrangell Mountains in Unit 11 (Hatcher 2020; Putera and Miller 2018). Mentasta herd numbers are low, and all harvest has been closed since the 1990s. Federal harvest limits for NCH hunts in Units 11 and 12 remainder include provisions designed to minimize incidental harvest of Mentasta caribou, including a bulls-only harvest limit in Unit 11, harvest limits of a single caribou in both units, and delegations of authority to close areas when Mentasta caribou are present. Recent collar data indicate Mentasta caribou mix with the NCH, including in Unit 13.

Over 95% of total NCH harvest occurs in Unit 13. Between 2001 and 2022, harvest from the NCH under State regulations ranged from 519–5,785 caribou/year (**Table 3**). Over the same period, caribou harvest under Federal regulations in Unit 13 ranged from 102–610 caribou/year (**Table 3**). Federal harvest (FC1302) accounts for 14% of the total Unit 13 caribou harvest on average. Fluctuations in Unit 13 caribou harvest parallels changes in abundance and population estimations. No Federal or State harvest of Nelchina caribou has occurred since 2022/23 as all hunts were closed due to conservation concerns in 2023.

Federal FC1302 permits issued from 2019–2022 averaged 2,746, which approximates the long-term average (2001-2022) of 2,762 permits (**Table 4**). However, the 2022/23 reported Federal harvest of 166 caribou was much lower than the long-term average (2001–2022) of 371 caribou (OSM 2023). The lower 2022/23 Federal subsistence harvest may be because of lower abundance of caribou or because they migrated through Federal public lands during October when the season was closed.

Between 2001 and 2022, the number of Federal subsistence hunters and harvest success rates for the FC1302 hunt have shown substantial annual variation (**Table 4**). Between 2001 and 2022, Federal subsistence hunter numbers ranged from 898 to 1,560 with an average 1,326 per year. Harvest for the same time frame ranged from 102 to 610 caribou with an average success rate of 28%. (OSM 2023). Success rates for caribou harvest depend largely on caribou availability (a function of migration timing) rather than abundance, and availability likely explains some of the substantial annual variation. Of note, federally qualified subsistence users may also harvest under State regulations, and those harvests are not reflected in the data above or in Table 4. The data described above and in **Table 4** only considers harvests under Federal regulations (FC1302).

Table 3. Total harvest of Nelchina caribou in Unit 13, including State harvest quota, State harvest, and Federal harvest (Tobey and Kelleyhouse 2007; Schwanke and Robbins 2013; Robbins 2015, pers. comm.; BLM 2020; OSM 2023). Note hunts were closed in 2023 and 2024.

Regulatory Year	Harvest Quota	State Harvest	Federal Harvest (FC1302)	Total Unit 13 Harvest
2001	-	1,479	498	1,977
2002	-	1,315	337	1,652
2003	-	995	322	1,317
2004	-	1,226	335	1,561
2005	-	2,772	610	3,382
2006	-	3,043	570	3,613
2007	-	1,314	385	1,699
2008	-	1,315	273	1,588
2009	-	753	349	1,102
2010	2,300	1,899	451	2,350
2011	2,400	2,032	395	2,427
2012	5,500	3,718	537	4,255
2013	2,500	2,303	279	2,582
2014	3,000	2,712	237	2,949
2015	5,000	3,402	595	3,997
2016	N/A[a]	5,785	491	6,276
2017	6,000	4,529	358	4,887
2018	1,400	1,411	370	1,781
2019	3,450	2,735	102	2,837
2020	5,090	3,770	306	4,076
2021	1,250	1,505	220	1,725
2022	615	519	166	685
2023, 2024	0	0	0	0

Table 4. The number of permits issued, permits used, and caribou harvested under permit FC1302 Federal caribou hunt in Unit 13 (OSM 2023). Note hunts were closed in 2023 and 2024.

Regulatory Year	Permits Issued	Hunted	Harvested Male	Harvested Female	Harvested Unknown Sex	Total Harvested
2001	2,565	1,469	489	3	6	498
2002	2,507	1,379	323	2	12	337
2003	2,574	1,240	317	2	3	322
2004	2,555	1,337	248	85	2	335
2005	2,557	1,499	365	238	7	610
2006	2,631	1,317	318	238	14	570
2007	2,399	1,092	259	120	6	385
2008	2,532	1,229	180	89	4	273
2009	2,576	1,339	342	7	0	349
2010	2,852	1,535	316	129	6	451
2011	2,980	1,425	281	113	1	395
2012	2,953	1,518	326	203	8	537
2013	2,781	1,303	210	68	1	279
2014	2,943	1,395	177	59	1	237
2015	3,061	1,560	444	147	4	595
2016	3,151	1,530	299	192	0	491
2017	3,071	1,526	208	148	2	358
2018	3,082	1,433	232	135	3	370
2019	2,785	898	80	21	1	102
2020	2,915	1,194	193	112	1	306
2021	2,606	945	149	71	0	220
2022	2,676	1,015	115	51	0	166
2023, 2024	0	0	0	0	0	0
AVERAGE (2001-2022)	2,762	1,327	267	102	4	372

Alternative(s) Considered

Proposal WP26-01 requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and to rescind the associated DALs. While the delegated authority for Unit 13 caribou was already transferred into unit-specific regulations via Proposal WP25-01, Proposal WP26-01 contains some additional clarifying, boiler plate language that should apply to all delegated authority in unit-specific regulations. Specifically, Federal regulations for delegated authority (§___.10(d)(6)) specify the Board may delegate authority "within frameworks established by the Board." To clarify this in the unit-specific regulations, the phrase "within the regulatory parameters set by the Board" was added.

An alternative offered by NPS staff would protect the Mentasta Caribou Herd, which ranges into Unit 13C. Rather than changing the harvest limit in Unit 13C to "up to two caribou," maintaining it as "up

to two bulls" would provide the management flexibility this proposal is requesting, while also addressing conservation concerns associated with the incidental harvest of female Mentasta caribou. Allowing the harvest of "up to two caribou" of either sex in Unit 13C has the potential to jeopardize the sustainability and long-term conservation of the Mentasta Caribou Herd, although Federal lands only comprise 3% of Unit 13C. This proposed change may reduce the effectiveness of existing Federal regulations in Unit 13C that are intended to minimize incidental take of Mentasta cow caribou. However, the in-season manager would be given the ability to "define harvest areas," which would allow for different harvest regulations, such as harvest limits, in different subunits.

Discussion and Effects

If this proposal is adopted, the Unit 13 remainder harvest limit for caribou will become "up to 2 caribou," and the BLM Glennallen FO Manager will be delegated authority to set the harvest limit and sex restriction for caribou in Unit 13 remainder. Adopting this proposal will also align Unit 13 remainder caribou regulations with Units 13A and 13B, reducing regulatory complexity and confusion.

Delegating authority will allow for responsive, in-season management actions to protect the NCH population from possible overharvest or to allow additional subsistence harvest opportunity as conditions allow. Currently, no NCH hunts are occurring due to conservation concerns, but as the herd recovers and population levels allow for some harvestable surplus, the management flexibility provided by this proposal will be useful. For example, during times of population decline and conservation concern, the ability to restrict the harvest limit to only one caribou or one bull could help protect the NCH from further declines, while still allowing some harvest opportunity for federally qualified subsistence users.

OSM PRELIMINARY CONCLUSION

Support Proposal **WP26-27 with modification** to delegate additional authority to define harvest areas and to clarify and simplify the regulatory language.

Disclaimer: These are draft regulations written by staff to convey OSM's conclusion. OSM maintains leeway in revising the regulatory language below, if needed to most accurately reflect OSM's conclusion and the Board's motion on record.

The draft regulations read:

Unit 13—Caribou

Unit~~s~~ 13 ~~A and 13B~~ — up to 2 caribou by Federal registration permit only (FC1302)	*May be announced between Aug. 1–Sep. 30*
*The Glennallen Field Office Manager, ~~in consultation~~ **after coordination***	*May be announced*

*with ~~the~~ **Wrangell-St. Elias National Park and Preserve, Denali National Park and Preserve,** Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, ~~may~~ **is authorized within the regulatory parameters set by the Board, to** announce season dates, harvest quotas, open/close seasons, **define harvest areas**, and set sex restrictions and harvest limits.*	*between Oct. 21–Mar. 31*
Federal public lands in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations.	
Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.	
~~Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)~~	*~~May be announced between Aug. 1–Sep. 30~~*
~~The Glennallen Field Office Manager, in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Denali National Park and Preserve Superintendent, Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons.~~	*~~May be announced between Oct. 21–Mar. 31~~*
Federal public lands in Unit 13C are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona hunting under these regulations.	
Federal public lands in Unit 13D are closed to caribou hunting except by residents of Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina hunting under these regulations.	

Federal public lands in Unit 13E are closed to caribou hunting except by residents of Cantwell, Chase, Denali Village (formerly McKinley Village), and the area between mileposts 216-239 of the Parks Highway (excluding residents of Denali Park Headquarters) hunting under these regulations.

Justification

Delegating authority to manage the NCH hunt provides management flexibility to quickly respond to changing herd and hunt conditions, optimizing conservation and subsistence opportunity. Adopting WP26-27 will allow for quick in-season management decisions to be made for protection of the NCH when a conservation concern arises in Unit 13 remainder. Similarly, changing the harvest limit to 'up to 2 caribou' balances conservation and subsistence opportunity. This proposal aligns harvest limits and delegated authority for caribou across Unit 13, creating consistency in management and subsistence opportunity.

Changing the harvest limit and delegated authority results in the regulations for all subunits in 13 being exactly the same, nullifying the need for separate hunt areas. Combining the hunt areas reduces regulatory complexity. Delegating additional authority to define harvest areas allows the in-season manager to announce different harvest limits for different hunt areas to protect Mentasta caribou. As Unit 13 caribou are managed under one Federal permit, any differences can be noted on the permit. Clarifying the delegated authority language ensures compliance with and consistency across Federal regulations.

LITERATURE CITED

ADF&G 2008. Caribou Annual Survey and Inventory. Federal Aid Annual Performance Report Grant W-33-6, Anchorage, AK.

ADF&G 2010b. Hunting and Trapping Emergency Order No. 04-1-10. ADF&G. Glennallen, AK.

ADF&G 2017. Harvest General Reports database. https://secure.wildlife.alaska.gov/index.cfm?adfg=harvest.main&_ga=1.109733509.1089519111.1465854136, accessed March 6, 2017. Anchorage, AK.

ADF&G 2019a. 2019-2020 Alaska Subsistence Permit Hunt Supplement. http://hunt.alaska.gov.

ADF&G 2019b. Hunting and Trapping Emergency Order No. 04-09-19. ADF&G. Glennallen, AK.

ADF&G. 2022a. 2023-2024 Alaska Drawing Permit Hunt Supplement. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.adfg.alaska.gov/static/applications/web/nocache/license/huntlicense/pdfs/2023-2024_draw_supplement.pdf76BD9B2BDE28FD6331C233465A4691EA/2023-2024_draw_supplement.pdf. Accessed July 8, 2023.

ADF&G 2022b. Hunting and Trapping Emergency Order No. 04-08-22. ADF&G. Glennallen, AK.

ADF&G 2022c. Hunting and Trapping Emergency Order No. 04-06-22. ADF&G. Glennallen, AK.

ADF&G. 2023a. Tab 7.1 Proposals for Other Regions Excluding Reauthorizations. ADF&G Southcentral Region Board of Game Meeting. March17–22, 2023 Soldotna, AK. http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-17-2023&meeting=kenai Accessed March 30, 2023.

ADF&G. 2023b. Feasibility Assessment for Maintaining or Increasing Sustainable Harvest of Nelchina Caribou in Game Management Unit 13. ADF&G Southcentral Region Board of Game Meeting. March17–22, 2023 Soldotna, AK.

ADF&G. 2023c. Annual Report on Intensive Management for Moose with Predation Control in Unit 13. ADF&G, Division of Wildlife Conservation.

ADF&G. 2024a. 2023 Nelchina Caribou Herd Fall Composition Survey and Fall Population Estimate Memorandum. ADF&G, Division of Wildlife Conservation. Glennallen, AK. Apr. 7, 2024.

ADF&G. 2024b. GMU 13 Moose and Caribou Harvest and Population Updates for Acs. Dec. 2024. Glennallen, AK.

BOG. 2025. Transcripts of Board of Game proceedings. January 14, 2025. Alaska Department of Fish and Game, Department of Wildlife Conservation. Juneau, AK.

BLM. 2020. Bureau of Land Management, Glennallen Field Office Agency Report. Southcentral Subsistence Regional Advisory Council meeting. March 4-5, 2020. Anchorage, AK.

Hatcher, H. 2020. Mentasta caribou herd management report and plan, Game Management Unit 11: Report period 1 July 2012-30 June 2017, and plan period 1 July 2017-30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-15, Juneau.

Hatcher, H. 2021. Wildlife biologist. Personal communication: email. ADF&G. Glennallen, AK.

Hatcher, H. 2024. Wildlife biologist. Personal communication: email. ADF&G. Glennallen, AK.

Hatcher, H. L., and W. F. Robbins. 2021. Nelchina caribou herd management report and plan, Game Management Unit 13: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-16, Juneau.

OSM. 2012. Staff analysis WP12-25. Pages 589–603 in Federal Subsistence Board Meeting Materials April 6–April 10, 2012. Office of Subsistence Management, FWS. Anchorage, AK. 1020 pp.

OSM. 2018. Staff analysis WP18-19. Pages 736-802 in Federal Subsistence Board Meeting Materials April 10-13, 2018. Office of Subsistence Management, FWS. Anchorage, AK. 1488pp.

OSM. 2023. Federal permits database. Office of Subsistence Management, USFWS. Anchorage, AK. Accessed April 17, 2023.

Putera, J. A., and S. D. Miller. 2018. Protocol for monitoring caribou populations in Wrangell-St. Elias National Park & Preserve, Central Alaska Network: Narrative – version 1.0. Natural Resource Report NPS/CAKN/NRR—2018/1750. National Park Service, Fort Collins, Colorado.

Rinaldi, T.A. 2019. Wildlife biologist. Personal communication: email. ADF&G. Palmer, AK.

Robbins, W.F. 2015. Wildlife biologist. Personal communication. Phone, email. ADF&G. Glennallen, AK.

Schwanke, R.A. 2011. Unit 13 and 14B caribou management report. Pages 90-108 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2008 –30 June 2010. ADF&G. Juneau, AK.

Schwanke, R.A. and W.F. Robbins. 2013. Unit 13 and 14B caribou management report. Pages 104-124 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2010 –30 June 2012. ADF&G. ADF&G/DWC/SMR-2013-3, Juneau, AK.

Tobey, R. W. 2003. Units 13 and 14B caribou management report. Pages 108-124 in C. Healy, editor. Caribou management report of survey and inventory activities 1 July 2000 – 30 June 2002. ADF&G. Juneau, Alaska.

Tobey R. W. and R. Kelleyhouse. 2007. Units 13 and 14B caribou management report. Pages 83-99 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2004-30 June 2006. ADF&G. Juneau, AK.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission

WP26–28a Executive Summary	
General Description	Wildlife Proposal WP26-28a requests to extend the closing date of the moose season in Unit 11 to September 30. *Submitted by: Southcentral Alaska Subsistence Regional Advisory Council*
Proposed Regulation	**Unit 11—Moose** *Unit 11, that portion draining into the east bank of the Copper River upstream from and including the Slana River drainage—1 antlered bull by joint Federal/State registration permit.* — *Aug. 20—Sep. ~~20~~ **30*** *Unit 11, that portion south and east of a line running along the north bank of the Chitina River, the north and west banks of the Nazina River, and the west bank of West Fork of the Nazina River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain—1 bull by Federal registration permit.* — *Aug. 20—Sep. ~~20~~ **30***; *Nov. 20—Jan. 20* *However, during the period Aug. 20-Sep. 20, only an antlered bull may be taken.* *Unit 11, remainder—1 antlered bull by Federal registration permit only* — *Aug. 20—Sep. ~~20~~ **30***
OSM Preliminary Conclusion	**Oppose**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	

ADF&G Comments	
Written Public Comments	**1 support** See Written Public Comments on Wildlife Proposal and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Draft Wildlife Analysis
WP26-28a

ISSUE

Wildlife Proposal WP26-28a, submitted by the Southcentral Alaska Subsistence Regional Advisory Council (Council), requests to extend the closing date of the moose season in Unit 11 to September 30.

Proponent Statement

The proponent states that this proposal would extend the moose season to compensate for changes in climate and allow for additional harvest opportunity and provide a subsistence priority.

Note: Wildlife Proposal WP26-28b requests extending the closing date of the moose season in Unit 13 to September 30.

Current Federal Regulations

Unit 11—Moose

Unit 11, that portion draining into the east bank of the Copper River upstream from and including the Slana River drainage—1 antlered bull by joint Federal/State registration permit.	*Aug. 20—Sep. 20*
Unit 11, that portion south and east of a line running along the north bank of the Chitina River, the north and west banks of the Nazina River, and the west bank of West Fork of the Nazina River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain—1 bull by Federal registration permit. *However, during the period Aug. 20-Sep. 20, only an antlered bull may be taken.*	*Aug. 20—Sep. 20* *Nov. 20—Jan. 20*
Unit 11, remainder—1 antlered bull by Federal registration permit only	*Aug. 20—Sep. 20*

Proposed Federal Regulations

Unit 11—Moose

Unit 11, that portion draining into the east bank of the Copper River upstream from and including the Slana River drainage—1 antlered bull by joint Federal/State registration permit.	*Aug. 20—Sep.* ~~*20*~~ ***30***
Unit 11, that portion south and east of a line running along the north bank of the Chitina River, the north and west banks of the Nazina River, and the west bank of West Fork of the Nazina River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain—1 bull by Federal registration permit. *However, during the period Aug. 20-Sep. 20, only an antlered bull may be taken.*	*Aug. 20—Sep.* ~~*20*~~ ***30*** *Nov. 20—Jan. 20*
Unit 11, remainder—1 antlered bull by Federal registration permit only	*Aug. 20—Sep.* ~~*20*~~ ***30***

Current State Regulations

Unit 11−Moose

Unit 11, that portion east of the east bank of the Copper River upstream from and east of the east bank of the Slana River	*Residents: One bull by permit, available only by application* *OR*	*CM300*	*Aug. 20—Sept. 20*
	Residents: One bull by permit *OR*	*DM250*	*Aug. 20—Sept. 17*
	Residents: One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side by permit available in person in Anchorage, Fairbanks, Glennallen, Palmer, Slana Ranger Station, and Tok beginning Aug. 2	*RM291*	*Aug. 20—Sept. 17*

	Nonresidents: One bull with 50-inch antlers or antlers with 3 or more brow tines on at least one side by permit available in person in Anchorage, Fairbanks, Glennallen, Palmer, Slana Ranger Station, and Tok beginning Aug. 2	*RM291*	*Aug. 20—Sept. 17*
Unit 11, remainder	*Residents: One bull by permit, available only by application*	*CM300*	*Aug. 20-Sept. 20*
	Residents: One bull by permit	*DM250*	*Aug. 20-Sept. 20*
	Residents and Nonresidents: 1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side	*HT*	*Aug. 20-Sept. 20*

Extent of Federal Public Lands

Unit 11 is comprised of approximately 89% Federal public lands that consist of 86% National Park Service (NPS), 2% U.S. Forest Service (USFS), and <1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Rural residents of Units 11, 12, 13A, 13B, 13C, and 13D, Chickaloon, Dot Lake and Healy Lake have a customary and traditional use determination for moose in Unit 11, north of the Sanford River.

Rural resides of Units 11, 13A, 13B, 13C, and 13D, and Chickaloon have a customary and traditional use determination for moose in Unit 11 remainder.

Under the guidelines of Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.

Resident zone communities must also have a customary and traditional use determination for moose in the area to be eligible to hunt moose in Wrangell-St. Elias National Park. In Unit 11 north of the Sanford River, the following communities meet both criteria: Chisana, Chistochina, Chitina, Copper

Center, Gakona, Gakona Junction, Glennallen, Gulkana, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tazlina, Tanacross, Tetlin, Tok, and Tonsina. In Unit 11 remainder, the following communities meet both criteria: Chistochina, Chitina, Copper Center, Gakona, Gakona Junction, Glennallen, Gulkana, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Slana, Tazlina, and Tonsina

Regulatory History

In 1992, the Federal Subsistence Board (Board) added 10 days to the moose season in Unit 11, aligning it with the Aug. 25-Sept. 20 seasons in adjacent Units 6, 12, and 13 (OSM 1992).

In 1999, Healy Lake was added to communities having a customary and traditional use determination for moose in the portion of Unit 11 north of the Sanford River (OSM 1999a). In 1999, the Board adopted Proposal P99-16 with modification to extend the start date of the Unit 11 moose season by five days to provide additional opportunity for subsistence harvest while protecting the moose population from disruption during the breeding season, and to align Federal and State seasons (OSM 1999b).

In 2000, the Board adopted Proposal P00-20 to modify the general regulations requiring evidence of sex, allowing hunters in Units 11 and 13 to possess either sufficient portions of the external sex organs, still attached to a portion of the carcass, or the head (with or without the antlers attached) to indicate the sex of the harvested moose; however this does not apply to the carcass of an ungulate that has been butchered and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed (OSM 2000).

In 2007, the Board rejected Proposal WP07-20 to change the season dates from Aug. 20-Sept. 20 to Sept. 1–Sept. 30 to reduce spoilage due to warm weather, because the moose population was low and shifting the season had the potential to increase moose harvest, which would have detrimental effects for the conservation of the population (OSM 2007).

In 2012, the Board adopted Proposal WP12-70 with modification, dividing Unit 11 into two hunt areas and creating a single, joint Federal/State registration permit for the hunt area in Units 11 and 12 along the Nabesna Road, and a Federal registration permit for Unit 11 remainder. The season dates for Unit 12 remainder were also modified. These changes aligned State and Federal seasons within the area of the joint State/Federal registration permit and helped to improve harvest reporting. In addition, the moose population was healthy enough to allow for the potential increase in bull harvest (OSM 2012).

In 2014, the Board adopted Proposal WP14-16 with modification to establish a winter moose season from Nov. 20 to Dec. 20 in Unit 11, south and east of a line running along the north bank of the Chitina River, the north and west banks of the Nizina River, and the west bank of the West Fork of the Nizina River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain (Unit 11 South). The Board also delegated authority to the WRST Superintendent to open and close any portion of the winter season and to establish a harvest quota (OSM 2014). Moose in the area south of the Chitina River typically stay at higher elevations during the fall where they are largely inaccessible to subsistence users. In addition, there is limited access during the fall moose season due,

in part, to having to cross the Chitina River. The winter hunt provides subsistence hunters with more opportunity to hunt moose when they are more accessible by snowmachine and allows them to store meat without freezers.

In 2018, the Board adopted Proposals WP18-16/50 to extend the closing date of the winter moose hunt in the Unit 11 South (FM1107) from December 20 to January 20. Both the Southcentral and Eastern Interior Councils supported the season extension as there were no conservation concerns, and the extension would benefit subsistence users by allowing safer travel across the Chitina River and Nizina River when the rivers are more likely to be frozen, and provide better weather conditions for preserving meat.

Also in 2018, the Board rejected Proposal WP18-17 to extend the moose season in Unit 11, that portion draining into the east bank of the Copper River upstream from and including the Slana River drainage (Unit 11 Nabesna Rd.) and Unit 11 remainder from Aug. 20-Sept. 20 to Aug. 20-Mar. 31. The Southcentral Council opposed the proposal due to low moose densities and conservation concerns over increasing harvest to unsustainable levels by extending the season by six months.

In April 2020, the Board adopted deferred Proposal WP18-19 with modification to establish a community harvest system for moose and caribou in Units 11 and 13 administered by the Ahtna Intertribal Resource Commission (AITRC). The modification was to name eight individual communities within the Ahtna traditional use territory authorized to harvest caribou and moose as part of the community harvest system, subject to a framework established by the Board under unit specific regulations. In 2022, the Board adopted WP22-36 with modification which clarified and codified several regulation changes regarding the community harvest system, including expanding the system into a portion of Unit 12.

Current Events

Proposal WP26-01 requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and rescind the associated DALs. The delegated authority to the WRST superintendent for in-season management of the Unit 11 South winter moose hunt is included in this proposal.

Biological Background

The moose population has been considered low density across Unit 11 for many years, although counts during aerial surveys tend to vary between very low periods (0.1 moose/mi^2 in 1979 and 1992) and considerably higher periods (1.0 moose/mi^2 in 1969 and 2012; 1.2 moose/mi^2 in 2017) (Hepler 2025). Predation on moose calves by bears and wolves has been shown to be an important limiting factor in some moose populations (Tobey 2010). High brown bear and wolf numbers in Unit 11 may be contributing to the low calf:cow ratios observed in this unit, as well as the overall low, but stable density moose population (Tobey 2008).

The State management objective for moose in Unit 11 is to maintain a population with a post-hunt (fall) minimum bull:cow ratio of 30 bulls:100 cows (Hepler 2025).

Given the low hunting pressure, limited access, and relatively low levels of predator harvest in Unit 11, the moose population is expected to remain at a relatively stable but low density. Bull:cow ratios remain well above management objectives, and other metrics including calf:cow ratios and overall moose densities have remained relatively stable. Annual fluctuations may occur with changing winter severity (Hepler 2025). Indeed, the annual snowpack in Unit 11 was well above average from 2021-2023 (~34" vs. the average 24") (ADF&G 2025). This higher snowpack three winters in a row may have negatively impacted overwinter survival and recruitment of the Unit 11 moose population. Higher snowpack also makes moose more susceptible to wolf predation.

ADF&G conducts aerial surveys along the western slopes of Mt. Drum in Unit 11 about every other year to determine population and composition trends. While this survey area only comprises a small portion of Unit 11, it is a long-term, consistent data set and provides an index for moose status in Unit 11 unit-wide. Between 1998 and 2017, moose densities ranged from 0.4 – 1.2 moose/mi^2 with the highest density estimate occurring in 2017 (**Table 1**). Over the same time period, bull:cow ratios ranged from 50-157 bulls:100 cows, averaging 89 bulls:100 cows. While bull:cow ratios have been declining since 2000, they are still very high, well above management objectives.

Fall calf:cow ratios of < 20 calves:100 cows, 20-30 calves:100 cows, and > 30-40 calves:100 cows may indicate declining, stable, and growing moose populations, respectively (Stout 2010). From 1998-2017, calf:cow ratios in the Mt. Drum survey area ranged from 9-48 calves:100 cows, averaging 21 calves:100 cows (**Table 1**). While 48 calves:100 cows were estimated in 2006, the next highest ratio was 26 calves:100 cows in 2013. These low calf:cow ratios suggest the Mt. Drum moose population is stable to declining (Hepler 2025; OSM 2018).

Wrangell-St. Elias National Park and Preserve (WRST) has also conducted periodic moose surveys across Unit 11 and portions of Unit 12. Their most recent survey in 2023 estimated a record low number of moose, representing a nearly 40% decline from the previous survey in 2013 (**Table 2**). Bull:cow ratios remained well above management objectives, while calf:cow ratios were below 20 calves:100 cows in all survey years, indicative of declining moose populations. The lowest calf:cow ratio occurred in 2023 with only 8 calves:100 cows (**Table 2**). One explanation for the drastic population decline in 2023 is the record snow amounts during the winters of 2021-2023 (Cutting 2025).

Habitat

In 2009, the Chakina fire near McCarthy burned 56,000 acres in the accessible portion of Unit 11 south of the Chitina River and should produce forage for the next 20 years (Hatcher 2014). A portion of that area (approximately 20,000 acres) re-burned in the Steamboat Creek fire in 2016 (WRST 2016). Typically within 10 –15 years following fires or disturbance (Loranger et al. 1991), early seral forest habitat becomes the most productive area for moose because it supports high density of forage species such as paper birch (*Betula papyrifiera*), aspen (*Populus tremuloides*), and willow (*Salix sp.*). The

severity and frequency of fires will determine how productive an area becomes for moose (Loranger et al. 1991; Johnstone and Kasischke 2005; Brown and Johnstone 2012).

Table 1. Unit 11 moose population demographics on the western slopes of Mount Drum, Wrangell-St Elias National Park and Preserve, AK, – a lightly hunted population (Tobey 2004, 2008; Schwanke 2013, Hatcher 2014, Robbins 2017, pers.comm., Hepler 2025).

Regula-tory Year	Total Moose	Bulls:100 cows	Calves: 100 Cows	Density (#/mi^2)
1998	104	111	15	0.4
1999	122	109	21	0.4
2000	104	157	24	0.4
2001	93	94	9	0.3
2002	----		---	----
2003	138	115	15	0.5
2004	----		----	----
2005	----		----	----
2006	149	92	48	0.5
2007	----		----	----
2008	164	73	17	0.6
2009	----		----	----
2010				
2011	265	71	21	0.9
2012	282	84	13	1.0
2013	221	88	26	0.8
2014	230	50	23	0.8
2015	230	50	23	0.8
2016	-		-	-
2017	358	58	18	1.2
2018	-		-	-
2019	-		-	-
Average	189.2	88.6	21.0	0.7

Table 2. Survey results from four moose population surveys, Unit 11 and 12, Wrangell-St. Elias National Park and Preserve (Cutting 2025).

Year	Population Count	Calves:100 Cows	Bulls:100 Cows
2007	1650	19	53
2010	1533	17	51
2013	2199	18	64
2023	1330	8	44

Harvest History

Moose harvest from 1963 to 1974 averaged 164 moose per year in Unit 11. During this time, there was both a fall and winter season and cows made up as much as 50% of the harvest (Tobey 2010). In response to declining moose numbers, seasons were shortened, the winter season was eliminated, and harvest was restricted to bulls only from 1975 to 1989. The average annual bull harvest was 45 (range 21-58) between 1975 and 1989. In 1990 the State season was shortened to Sept. 5 - 9 to align the season with adjacent Unit 13 and because of population declines due to increased mortality during the severe winter of 1989/1990. During the 1990s, the average harvest was 34 bulls (range 22-42) (Tobey 1993, 2010).

Moose harvest occurs under a variety of different Federal and State hunts in Unit 11. Along the Nabesna Road area of Unit 11, harvest occurs by State registration permit RM291 under both State and Federal regulations. The State RM291 hunt has antler restrictions, while the Federal hunt just limits harvest to any antlered bull. The State also has a resident draw permit hunt (DM250) and the community hunt (CM300) for moose in Unit 11. In Unit 11, remainder the State also has a general season, antler restricted hunt. Federal fall hunts in Unit 11 South and Unit 11 remainder are by Federal registration permit FM1106, while Unit 11 South also has a winter registration permit hunt, FM1107.

Between 2000 and 2024, harvest averaged 55 moose, which includes an estimated 10 unreported moose being harvested each year (**Table 3**) (Cohen 2025 pers. comm.; OSM 2018, Hepler 2025). Between 2000 and 2019, Federal harvest comprised 25% of the total reported harvest (Hepler 2025). Success rates for Unit 11 moose hunts are generally low with the Federal subsistence hunts (FM1106 and FM1107) averaging success rates of 15% from 2014 – 2024 (Cohen 2025 pers. comm.). The joint Federal/State RM291 permit hunt averaged a 16% success rate during the same time frame (Hepler 2025).

The majority of moose harvest with general season harvest tickets occurs late in the season, with 58% of harvests occurring during the last two weeks of the season, on average from 2015-2019 (**Figure 1**). A similar pattern is assumed for the Federal RM291 and FM1106 permit hunts. Bull moose generally increase their movements at the onset of rut in mid-September, during which time they also respond better to hunter calls. This timing also coincides with leaf drop. The combination of factors results in bull moose being more vulnerable to harvest toward the end of the hunting season (Hepler 2025).

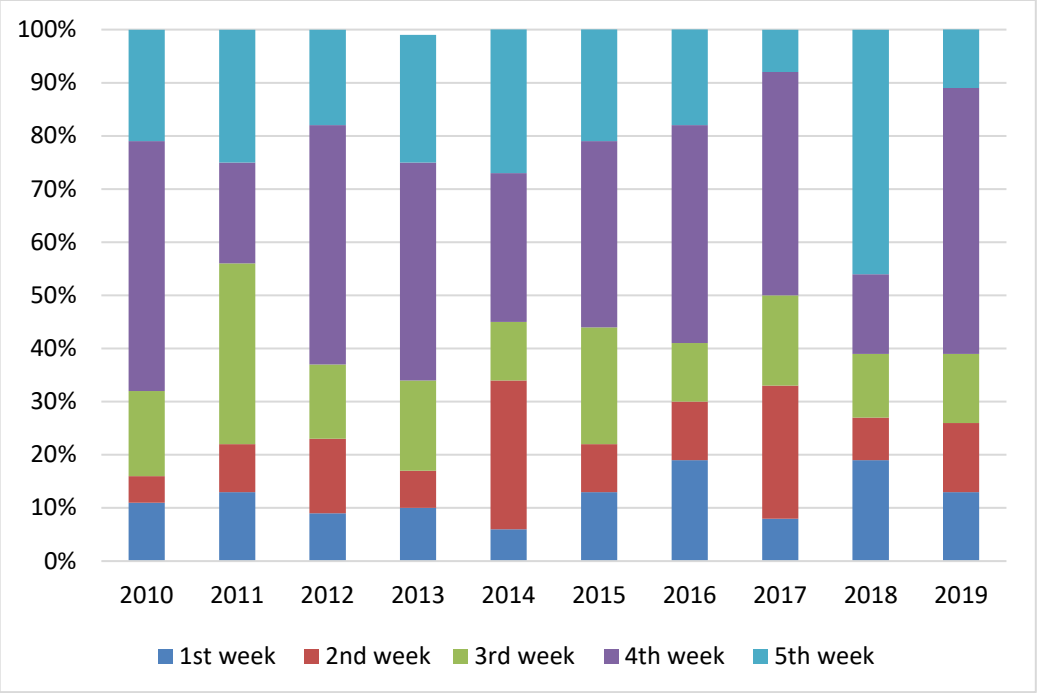


Figure 1. Percent of Unit 11 moose harvest during each week of the season under the general season state harvest ticket in Unit 11 remainder (Aug. 20 – Sep. 20) (Hatcher 2017; Hepler 2025).

Table 3. State and Federal moose harvest in Unit 11 from RY 2000-2024. Federal harvest includes harvest by Federal permit. State harvest includes harvest by State harvest ticket, registration permit, and community harvest permit. Harvests by federally qualified subsistence users under the joint State/Federal permit established in 2012 (RM291) are included in the "Total State" column. Unreported moose kill is estimated as 10 moose per year and included in the total harvest column (Cohen 2025 pers. comm.; OSM 2018; Hepler 2025).

Regulatory Year	M	F	U	Federal Total	State Total	Total
2000	52	0	1	23	30	63
2001	43	1	1	14	31	55
2002	40	0	1	8	33	51
2003	45	0	0	15	30	55
2004	56	0	1	27	30	67
2005	47	1	0	24	24	58
2006	41	0	1	20	22	52
2007	47	2	0	25	24	59
2008	53	0	0	28	25	63
2009	64	0	2	20	36	66
2010	38	0	0	20	18	48
2011	74	0	0	27	37	74
2012	48	0	0	9	39	58
2013	61	0	0	12	39	61
2014	39	0	0	10	29	49
2015	48	0	0	13	48	71
2016	63	0	0	17	63	90
2017	54	0	1	14	55	79
2018	56	0	0	13	56	79
2019	48	0	0	11	48	69
2020				17	37	54
2021				11	34	45
2022				16	26	42
2023				12	20	32
2024				13	24	37
Average	50.9	0.2	0.4	13.3	31.1	54.5

Discussion and Effects

If Proposal WP26-28a is adopted, the closing date of the Unit 11 moose season would be extended to September 30. This would provide an additional 10 days of opportunity for federally qualified subsistence users and provide for more of a subsistence priority. Subsistence users already have a priority for moose hunting in Unit 11 through more liberal harvest limits, a 3-day longer season in the Unit 11 Nabesna Rd (RM291) hunt area, and a winter season in the Unit 11 South hunt area (FM1107). Adoption of WP26-28a would also result in different season dates for federal hunters in the RM291 hunt area, depending on whether they were hunting in Unit 11 or 12.

Adopting this proposal could also improve harvest success as bulls are more susceptible to harvest in late September when they are in rut, especially given the warmer falls in recent years, which has been delaying leaf drop (making animals more difficult to spot) and making meat care in the field more difficult.

Impacts on the moose population are uncertain. While harvest pressure is expected to be relatively low, the Unit 11 moose population declined substantially in 2023, likely as a result of severe winters with record snow depths three years in a row. Therefore, the Unit 11 moose population may need more time to recover before seasons are extended, especially during late September when harvest success may increase.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP26-28a

Justification

While this proposal increases subsistence opportunity, there are conservation concerns for the Unit 11 moose population, which has declined substantially in recent years. Increasing harvests on the Unit 11 moose population is not recommended at this time.

LITERATURE CITED

ADF&G. 2025. Alaska Department of Fish and Game, Board of Game Glennallen Area Office Report Tab 5.1. Wasilla, AK. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/rc_4_tab_5.1.pdf. 12 pp. Retrieved: May 9, 2025.

Brown, C.D. and J.F. Johnstone. 2012. Once burned, twice shy: Repeat fires reduce seed availability and alter substrate constraints on *Picea mariana* regeneration. Forest Ecology and Management. 266:34-41.

Cohen, A.G. 2025. Wildlife biologist. Wrangell-St. Elias National Park and Preserve. Personal Communication.

Cutting, K. 2025. Wildlife biologist. Wrangell-St. Elias National Park and Preserve Wildlife report update. Spring 2025. https://www.doi.gov/sites/default/files/documents/2025-02/1813fiv-report-wrst-src-wildlife-update1172025final2508.pdf. Accessed June 5, 2025.

Hatcher, H.L. 2014. Unit 11 moose. Chapter 10, Pages 10-1 through 10-8, *in* P. Harper and L.A. McCarthy, editors. Moose management report of survey and inventory activities 1 July 2011 through 30 June 2013. ADF&G. Species Management Report ADF&G/DWC/SMR-2014-6, Juneau, AK.

Hatcher, H. L. 2017. Moose management report and plan, Game Management Unit 11: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2017-2, Juneau.

Hepler, J. D. 2025. Moose management report and plan, Game Management Unit 11: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2025-6, Juneau.

Johnstone, J.F. and E.S. Kasischke. 2005. Stand-level effects of soil burn severity on postfire regeneration in a recently burned black spruce forest. Canadian Journal of Forest Research. 35: 2151-2163.

Loranger, A.J., T.N. Bailey, and W.W. Larned. 1991. Effects of forest succession after fire in moose wintering habitats on the Kenai Peninsula, Alaska. Alces 27:100-110.

MOA. 2016. Memorandum of Agreement between the United States Department of Interior and Ahtna Inter-Tribal Resource Commission for A Demonstration Project for Cooperative Management of Customary and Traditional Subsistence Uses in the Ahtna Region. 21 pp.

OSM. 1992. Staff Analysis P92-22. Pages 110-113 *in* Federal Subsistence Board Wildlife Meeting Materials, April 6-10, 1992. Office of Subsistence Management. Anchorage, AK. 1254 pages.

OSM. 1999a. Staff Analysis P99-13/14. Pages 138-161 *in* Federal Subsistence Board Wildlife Meeting Materials, May 3-5, 1999. Office of Subsistence Management. Anchorage, AK. 794 pages.

OSM. 1999b. Staff Analysis P99-16. Pages 205-212 *in* Federal Subsistence Board Wildlife Meeting Materials, May 3-5, 1999. Office of Subsistence Management. Anchorage, AK. 794 pages.

OSM. 2000. Staff Analysis P00-20. Pages 129-138 *in* Federal Subsistence Board Wildlife Meeting Materials, May 2-4, 2000. Office of Subsistence Management. Anchorage, AK. 661 pages.

OSM. 2007. Staff Analysis WP07-20. Pages 237-246 *in* Federal Subsistence Board Wildlife Meeting Materials, April 30 - May 2, 2007. Office of Subsistence Management. Anchorage, AK. 622 pages.

OSM. 2012. Staff Analysis WP12-70/73. Pages 749-767 *in* Federal Subsistence Board Wildlife Meeting Materials, January 17 - 20, 2012. Office of Subsistence Management. Anchorage, AK. 1021 pages.

OSM. 2014. Staff Analysis WP14-16. Pages 93-117 *in* Federal Subsistence Board Wildlife Meeting Materials, April 15 - April 17, 2014. Office of Subsistence Management. Anchorage, AK. 678 pages.

OSM. 2018. Staff Analysis WP18-16_50. Pages 207-231 *in* Federal Subsistence Board Wildlife Meeting Materials, April 10-13, 2018. Office of Subsistence Management. Anchorage, AK. 1488 pages.

Robbins, F. 2017. Area Biologist. Personal communication: phone, email. ADF&G, Glennallen, AK.

Schwanke, R.A. 2013. Area Wildlife Biologist. ADF&G. Glennallen, AK. Personal communication.

Tobey, R.W. 1993. Unit 11 moose management report. Pages 75–84 *in* S. Abbott, editor. Federal Aid in Wildlife Restoration Survey-Inventory Management Report 1 July 1989–30 June 1991. ADF&G., Division of Wildlife Conservation. Projects W-23-3 and W-23-4, Study 1.0, Juneau, AK

Tobey, R. W. 2004. Unit 11 moose management report. Pages 121–129 *in* C. Brown, editor. Moose management report of survey and inventory activities 1 July 2001–30 June 2003. ADF&G. Project 1.0. Juneau, AK.

Tobey, R.W. 2008. Unit 11 moose management report. Pages 125-133, *in* P. Harper, editor. Moose management report of survey and inventory activities 1 July 2005 through 30 June 2007. ADF&G. Project 1.0. Juneau, AK.

Tobey, R.W. 2010. Unit 11 moose management report. Pages 124-132, *in* P. Harper, editor. Moose management report of survey and inventory activities 1 July 2007 through 30 June 2009. ADF&G. Project 1.0. Juneau, AK.

Wrangell-St. Elias National Park and Preserve (WRST). 2016. News Release – Steamboat Creek AK-CRS-5212 Fire Progression Map. July 24, 2016. Copper Center, AK. 3 pp.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission

WP26–71 Executive Summary	
General Description	Wildlife Proposal WP26-71, requests increasing the harvest limit for brown bear in Unit 12 to two bears. *Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council*
Proposed Regulation	**Unit 12—Brown Bear** *Unit 12—~~1~~ 2 bears* *Aug. 10-June 30.*
OSM Preliminary Conclusion	**Support**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 support** See Written Public Comments on Wildlife Proposal and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Draft Wildlife Analysis
WP26-71

ISSUE

Wildlife Proposal WP26-71, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests increasing the harvest limit for brown bear in Unit 12 to two bears.

Proponent Statement

The proponent states that increasing the brown bear harvest limit in Unit 12 would provide additional opportunity for federally qualified subsistence users. In Unit 12, State hunting regulations already allow two bears for resident hunters. There are no conservation concerns for brown bear in this unit.

Current Federal Regulations

Unit 12—Brown Bear

Unit 12—1 bear	*Aug. 10-June 30.*

Proposed Federal Regulations

Unit 12—Brown Bear

*Unit 12—~~1~~ **2** bear**s***	*Aug. 10-June 30.*

Current State Regulations

Unit 12−Brown Bear

Unit 12	*Residents: 2 bears every regulatory year*	*Aug 10-June 30*
	Nonresidents: 1 bear every regulatory year	*Aug 10-June 30*

Extent of Federal Public Lands

Unit 12 is comprised of approximately 61% Federal public lands that consist of approximately 49% National Park Service (NPS), 11% U.S. Fish and Wildlife Service (USFWS), and 1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Residents of Unit 12, Dot Lake, Chistochina, Gakona, Mentasta Lake, and Slana have a customary and traditional use determination (C&T) for brown bear in Unit 12.

The resident zone communities of Wrangell-St. Elias National Park (WRST) include 23 communities: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tazlina, Tanacross, Tetlin, Tok, Tonsina, and Yakutat.

Under the guidelines of Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.

Regulatory History

In 1990, when the Federal management of subsistence fish and wildlife resources on Federal public lands began, Federal subsistence regulations were adopted from State regulations. At that time, there was no Federal subsistence brown bear hunt in Unit 12, and the C&T was ‘no subsistence.’

In 1997, the Federal Subsistence Board (Board) adopted Proposal WP97-23 with modification, which recognized the customary and traditional uses of brown bear in Unit 11, 12, 13, and 20E. In Unit 12, the rural residents of Unit 12 and Dot Lake were included in the C&T determination.

In 1998, the Board adopted Proposal P98-96 with modification to add Chistochina, Gakona, Mentasta Lake, and Slana to the C&T determination for brown bears in Unit 12. The Board also adopted Proposal P98-97, which established a Federal brown bear hunt in Unit 12. The harvest limit was one bear with a season of Aug. 10-June 30. Federal brown bear seasons and harvest limits in Unit 12 have not changed since.

In 2016, the Board adopted Proposal WP16-18, allowing brown bears to be hunted over bait in Unit 12 from Apr. 15-Jun. 30.

At its March 2024 meeting, the Alaska Board of Game (BOG) adopted Proposal 120 to increase the resident State brown bear harvest limit in Unit 12 from one bear per year to two bears per year. The

BOG concluded that there were no biological concerns (BOG 2024). Changing the harvest limit to 2 bears also allows for the sale of brown bear hides and skulls under State regulations.

Current Events

In July 2025, the Board adopted deferred Wildlife Proposal WP24-01 as modified by OSM in its revised conclusion (February 2025). Proposal WP24-01 requested to allow the sale of brown bear hides. The OSM modification was that the hides of brown bears, with or without claws attached, may be purchased within the United States for personal use only and may not be resold. The hunter must request an OSM Customary Trade Permit and must return the permit to OSM. The modification also eliminated regulations requiring the skin of the skull and claws of brown bear hides to be retained at the time of sealing in certain areas. The Board adopted the proposal as modified in deference to nine Councils. However, this regulation cannot be implemented until the Office of Management and Budget (OMB) approves the creation and use of the new OSM Customary Trade Permit.

Biological Background

ADF&G manages Unit 12 brown bear populations for maximum sustained hunting opportunity, although biological information is extremely limited. No population surveys for brown bears have been conducted in Unit 12. The last population estimate was in the fall of 2000 based on extrapolations from density estimate surveys conducted in similar habitats in Interior and Southcentral Alaska, harvest distribution, and using sex and age composition of harvested bears. The fall 2000 Unit 12 brown bear population was estimated at 350–425 bears (18.0–21.9 bears of all ages/1,000 km^2 of useable habitat) (Wells 2021). In 2024, ADF&G reported to the BOG that Unit 12 has relatively high densities of brown bear (BOG 2024).

Harvest History

The State management objective for Unit 12 brown bear is to manage harvests so the 3-year mean harvest does not exceed 28 brown bears (of which no more than 5 can be females greater than 5-years old) per year and includes at least 55% males in the harvest (Wells 2021). All brown bears in Unit 12 must be sealed within 30 days of harvest. The take of cubs and sows with cubs is prohibited under Federal and State regulations.

Annual harvest from 2002-2023 averaged 21 brown bears in Unit 12, ranging from 8-39 bears per year, which met the management objective of the 3-year mean harvest < 28 bears (**Figure 1**). Resident and nonresident harvest averaged 12 bears and 9 bears per year, respectively (Hunter 2025 pers. comm.). Although there has been some fluctuation over the years, the average harvest has remained relatively stable since 1983 (Wells 2021).

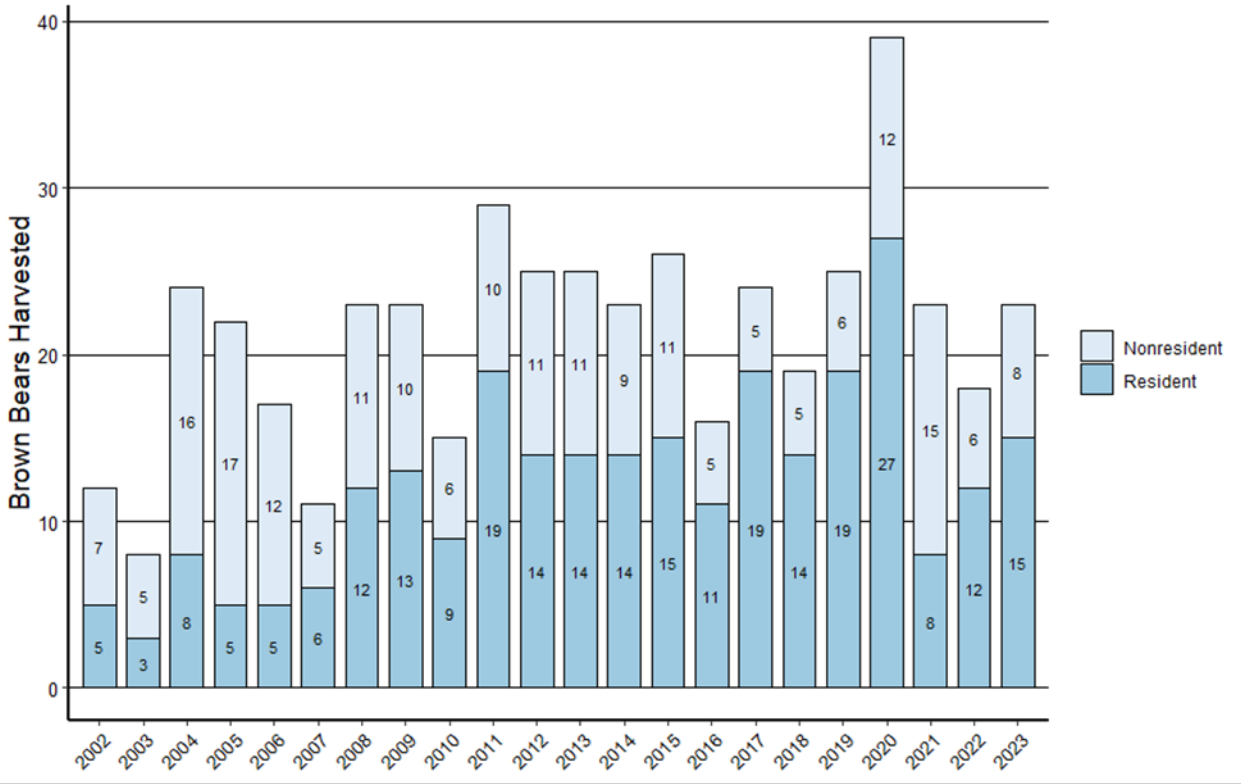


Figure 1. Unit 12 brown bear harvest by residency (Hunter 2025 pers. comm.)

Discussion and Effects

If adopted, this proposal would increase the brown bear harvest limit in Unit 12 to two bears, providing additional opportunities for federally qualified subsistence users to harvest brown bears under Federal regulations. No increases in harvest or impacts to the brown bear population are expected as users may already harvest two brown bears on most Federal public lands in Unit 12 under State regulations and harvest pressure is very low. The WRST lands in Unit 12 where State regulations do not apply are extremely remote where brown bear harvest is unlikely to occur. Although population data are extremely limited, there do not appear to be any conservation concerns due to low harvest pressure, prohibition on the take of sows with cubs protecting, and no observed substantial increases in brown bear harvests in other units where the harvest limit has increased to 2 bears. In fall of 2024, no hunter reported harvesting two bears from Unit 12 (ADF&G 2025).

Adopting this proposal would also decrease regulatory complexity by aligning State and Federal regulations as directed by Executive Order 14153 3(b)(xxii) to "ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands."

OSM PRELIMINARY CONCLUSION

Support Proposal WP26-71

Justification

This proposal increases harvest opportunity for federally qualified subsistence users. There are no conservation concerns due to low harvest levels and because Alaska residents may already harvest two bears in Unit 12 under State regulations.

LITERATURE CITED

Alaska Board of Game. 2024. Transcripts of Alaska Board of Game proceedings. March 19, 2024. Pike's Waterfront Lodge, Fairbanks, AK.

ADF&G. 2025. RC5: Department Reports and Comments on Proposals. Alaska Department of Fish and Game Staff Comments for Proposals 48, 57, and 58. Central/Southwest Region Proposals. Alaska Board of Game meeting. Wasilla, AK. January 10-17, 2025. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/dfg_comments-12.23.2024.pdf. Retrieved June 3, 2025.

Hunter, A. 2025. Wildlife biologist. Personal communication: email. ADF&G. Tok, AK.

Wells, J. J. 2021. Brown bear management report and plan, Game Management Units 12 and 20E: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-28, Juneau.

WRITTEN PUBLIC COMMENTS

The Ahtna Intertribal Resource Commission (AITRC)

WP26–74 Executive Summary	
General Description	**WP26-74** requests that the Board recognize the customary and traditional uses of sheep in Unit 12 by residents of Chitina and Kenny Lake.
Proposed Regulation	***Customary and Traditional Use Determination—Sheep*** *Unit 12* — *Residents of Unit 12, Chistochina, **Chitina**, Dot Lake, Healy Lake, **Kenny Lake**, Mentasta Lake, and*
OSM Preliminary Conclusion	**Oppose**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 Oppose** See Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Draft Customary and Traditional Use Analysis
WP26-74

ISSUE

Wildlife Proposal WP26-74, submitted by Bruce Gordon of Chitina, AK, requests that the Federal Subsistence Board (Board) recognize the customary and traditional uses of sheep in Unit 12 by residents of Chitina and Kenny Lake.

Proponent Statement

The proponent states that he and other residents of Kenny Lake and Chitina have a history of harvesting sheep in Unit 12. The proponent previously resided in Kenny Lake and now lives in Chitina, and he explained that residents of both communities have historically adapted their hunting locations based on the changing availability of wildlife in the region. He states, "if you are dependent on harvesting animals, you have to go where they are located." Residents of the region have also had to change their hunting locations because of intense hunting competition on the road system. The proponent states that since the 1970s he has hunted where he was most likely to obtain a permit under State opportunity, and that was often in Units 11 and 12 for sheep, moose, and caribou. He notes that guides dominated sheep hunting closer to Chitina.

The proponent states that he and his hunting partner raised their large families through subsistence and provided subsistence food for local community members. He and his son have hunted together as well. He worries that young people in the region will not be able to have the hunting opportunities that were open to his generation. He would like to be able to participate in the Federal subsistence elder sheep hunt in Unit 12 in an area in which he, his family, and hunting partner have a history of use. Many of his hunts have been on foot, and he would like to continue this practice. With the caribou population down, other opportunities are vital, but older individuals such as the proponent are unable to harvest moose, and sheep are an important alternative.

Much of this information, including the exact proposal request was not included in the submitted proposal, but clarified through follow-up conversations with the proponent.

Current Federal Regulations

Customary and Traditional Use Determination—Sheep

Unit 12	*Residents of Unit 12, Chistochina, Dot Lake, Healy Lake, Mentasta Lake, and Slana*

Proposed Federal Regulations

Customary and Traditional Use Determination—Sheep

Unit 12	*Residents of Unit 12, Chistochina, **Chitina**, Dot Lake, Healy Lake, **Kenny Lake**, Mentasta Lake, and Slana*

Extent of Federal Public Lands

Unit 12 is comprised of approximately 61% Federal public lands that consist of 49% National Park Service (NPS), 11% U.S. Fish and Wildlife Service (USFWS), and 1% Bureau of Land Management (BLM) managed lands.

Regulatory History

At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Board adopted a customary and traditional use determination of "no subsistence priority" for sheep in the Tok Management Area of Unit 12, and no rural residents were eligible to hunt sheep under Federal subsistence regulations. In the remainder of Unit 12, the Board did not adopt a customary and traditional use determination, so all rural residents were eligible to harvest sheep under Federal regulations (72 FR 22961, May 29, 1992).

In 1997, the Board received many proposals requesting changes to customary and traditional use determinations for sheep in Units 11, 12, and 13. Proposal P97-25c requested that the Board recognize the customary and traditional use of sheep in Unit 12 remainder by residents of Chistochina and Mentasta. The Board adopted the proposal with modification, creating a single customary and traditional use determination area in Unit 12 and adopting the Southcentral Alaska Subsistence Regional Advisory Council (Southcentral Council) recommendation to include rural residents of Unit 12, Chistochina, and Mentasta Lake as eligible to harvest sheep in the unit (62 FR 45723, August 29, 1997).

In 1998, the Healy Lake Traditional Council submitted Proposal P98-100 seeking to add Healy Lake to the customary and traditional use determination for sheep in Unit 12. The Eastern Interior Alaska Subsistence Regional Advisory Council (Eastern Interior Council) and Southcentral Council supported the proposal with modification to add rural residents of adjacent Units 11, 12, 13C, 20D, and 20E. The Board adopted the proposal with modification to add residents of Dot Lake and Healy Lake only. The Board said that there was insufficient evidence available during its deliberations to support including other rural residents. The Board clarified that rural residents of the community of Dot Lake would include rural residents of the village of Dot Lake and Dot Lake Junction (OSM 1998, 7; 63 FR 35338, June 29, 1998).

In 2020, the Board adopted Proposal WP20-51 to add Slana to the customary and traditional use determination for sheep in Unit 12. In doing so, it deferred to the recommendations of both the Eastern Interior and Southcentral Councils.

Background

Residents of Chitina and Kenny Lake already have a customary and traditional use determination for sheep in Unit 11. This means they are qualified to hunt sheep on Federal public lands in Unit 11 under Federal subsistence regulations. Additionally, there is a Federal sheep hunt in the portion of Unit 13D that excludes 13D, the Tok Management Area, and the Delta Controlled Use Area. There has not been a customary and traditional use determination for sheep in this area, and all rural residents are eligible. Within Unit 12, residents of Chitina and Kenny Lake are federally qualified to hunt moose in Unit 12 remainder, and wolf throughout the unit. Additionally, they can also participate in Federal hunts for other species that are open to all rural residents in Unit 12.

Eligibility requirements pertaining to national parks and monuments are subject to additional rules. Only people living withing a national park or monument, people living in resident zone communities and those households holding subsistence use permits issued under 36 CFR 13.440 can hunt in national parks and monuments. However, communities must have a customary and traditional use determination for a given species in the area *and* be resident zone communities for residents to be eligible to hunt that species in national parks and monuments.

The resident zone communities for Wrangell-St. Elias National Park are: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway/Northway Village/Northway Junction, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and Yakutat.

As shown above, Chitina and Kenny Lake are already resident zone communities for Wrangell-St. Elias National Park, a portion of which is located in the southern part of Unit 12. Because residents of Chitina and Kenny Lake meet both resident zone and customary and traditional use determination criteria for the national park lands in Unit 11, they can already hunt sheep on those lands. If the Board recognizes their customary and traditional use for sheep in Unit 12, they would also be able to hunt sheep in the portion of the park in Unit 12.

Currently residents of Chitina and Kenny Lake can hunt for sheep in Unit 12 under State regulations. Within the Tok Management Area, which includes the northern portion of Unit 12, they can harvest one ram with full-curl or larger every four regulatory years by drawing permit (DS102) from August 10 to September 20. In Unit 12 remainder, they can harvest one ram with full-curl horn or larger per regulatory year, by harvest ticket August 10 to September 20. There is also a youth hunt with the same bag limit in Unit 12 remainder, which runs from August 1 to August 5. There is no State subsistence hunt for sheep in Unit 12, as the State has made a negative finding for customary and traditional uses of sheep in Unit 12, that portion within the

Community Characteristics

The communities of Chitina and Kenny Lake fall within the traditional territory of the Ahtna Athabascans (de Laguna and McClellan 1981). Present-day Unit 12 overlaps with the upper Tanana region, populated historically by speakers of Tanacross and Upper Tanana Athabascan languages (McKennan 1981, Haynes and Simeone 2007), with whom the Ahtna have historically maintained ties based on reciprocity and kinship (Reckord 1983, Haynes and Simeone 2007).

Chitina

Chitina is located on the west bank of the Copper River near its confluence with the Chitina River, around mile 34 of the Edgerton Highway (La Vine and Zimpelman 2014). The community is located in Unit 13D, close to the boundary with Unit 11. The Chitina CDP also includes the Strelna area, which is across the Copper River in Unit 11. The important Lower Ahtna Athabascan settlement of Taral was located near this area, as were additional Ahtna camps, but Chitina itself developed around copper mining at Kennecott, and was connected to Cordova by railroad (La Vine and Zimpelman 2014). Chitina's population declined after the Kennecott Mine was closed, but has subsequently grown slowly over time (La Vine and Zimpelman 2014). In 2024, the estimated population of Chitina was 109 (ADLWD 2024).

Kenny Lake

Kenny Lake and Willow Creek are separate, adjacent census designated places (CDPs), but they are considered to be a single community, following ADF&G, Division of Subsistence (La Vine and Zimpelman 2014). Kenny Lake is located along the Edgerton Highway and parts of the Richardson and Old Edgerton highways, while Willow Creek "includes the roads just south of the junction of the Richardson and Old Edgerton highways then north towards Copper Center" (La Vine and Zimpelman 2014). Kenny Lake/Willow Creek is located in Unit 13D and across the Copper River from Unit 11.

Kenny Lake/Willow Creek is located in the Lower Ahtna area, near its boundary with the Central Ahtna area to the north (Simeone 2006). Ahtna settlements existed in this area, but the contemporary community of Kenny Lake was settled by homesteaders beginning in the 1950s (La Vine and Zimpelman 2014). Willow Creek CDP was established in 2000 and incorporated portions of the previous Kenny Lake CDP as well as part of the area bordering the Copper Center CDP (La Vine and Zimpelman 2014). In 2022, the estimated population of Kenny Lake CDP was 319, and the estimated population of Willow Creek CDP was 196, for a combined population of 515 (ADLWD 2024).

Eight Factors for Determining Customary and Traditional Use

A community or area's customary and traditional use is generally exemplified through these eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or

wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

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

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

Traditionally, sheep were an important and valued part of the Ahtna diet and were particularly important during periods of starvation (Reckord 1983, Simeone 2006). At the beginning of the 20th century, written and oral history indicates that the Lower Ahtna living in areas overlapping with present-day Chitina and Kenny Lake were often unable to obtain moose and caribou, and depended heavily on sheep, which were plentiful in the region (Simeone 2006). According to Simeone (2006), “In the recollection of many elders sheep were almost more important than any other resources except salmon” (42).

The Ahtna hunted for sheep and goats in the mountains simultaneously. In 2008, a Southcentral Council member recalled:

> Speaking to that, I would like to mention that when I first came to the valley, I used to visit with one of the older Native ladies in Chitina, and she talked about [hunting] in fall. In fall they headed up to the mountains to hunt sheep and goats simultaneously together. And they lived on sheep and goats up in the mountain until the snow drove them back down.

The Ahtna not only relied upon sheep but actively stewarded them through practices such as burning vegetation to increase new growth and food for the animals, as was reported by Katie John (Simeone 2006). In hunting any animal, skill was only one component of success. Following the proper behaviors and rituals both before and after taking an animal were equally important (de Laguna and McClellan 1981). Sheep were harvested in late summer and fall using bow and arrow, or caught using drag-pole snares set in stone fences (de Laguna and McClellan 1981, Simeone 2006). Sheep and other animals were cooked by stone-boiling in spruce bark baskets or by roasting on a spit, with men usually doing the cooking (de Laguna and McClellan 1981). Boiled strips of sheep meat were eaten slightly aged (Simeone 2006).

The Ahtna harvested sheep within their traditional territory, in areas relatively close to their camps and settlements, on the slopes of the Wrangell Mountains or the Alaska Range (de Laguna and McClellan 1981). Several Elders who grew up in the Lower Ahtna region in the 1920s and 1930s shared their families' hunting areas (Simeone 2006). Wayla Hobson, from the Chitina area, said that in the 1920s, her family was unable to find moose or caribou, and hunted for sheep in the mountains. Families in the area hunted sheep "up the Kotsina River to where the Kluvesna River comes in" (Simeone 2006: 27). People living at the traditional settlement of Taral, near present-day Chitina hunted up Canyon Creek and into the Hanagita Valley (Simeone 2006).

Etta Bell grew up in the Kenny Lake area. She "recalled that when she was young her family hunted the Chetaslina, Cheshnina, and Chichokna rivers for black bear, moose, and Dall sheep" (Simeone 2006: 28). She said that her family needed about 14 sheep and 2 moose each year (Simeone 2006). Margaret Eskilida grew up on the east bank of the Copper River opposite the mouth of the Tonsina River, between present-day Chitina and Kenny Lake. She remembered that there "were hardly any moose and only a few caribou so that people had to live off sheep meat, which they hunted on the Dadina and Nadina rivers. Her family also hunted sheep in the vicinity of Strelna" (Simeone 2006: 28). All of the areas described above by Lower Ahtna are in Unit 11.

Ahtna Elder Wilson Justin reported that when miners arrived in the Copper River valley, a commercial meat hunting industry developed to feed them, drawing heavily on sheep populations in the Wrangell Mountains (Simeone 2006: 16). Reckord reports that the impact of miners on the local sheep population from 1910 to the 1930s also brought new rules and limits on sheep hunting that applied not just to the miners, but to local families dependent on subsistence, interrupting their use (1983).

In the 1960s, according to Wilson Justin, commercial guiding began to push sheep into more marginal terrain that could support fewer sheep. He observed that since the 1970s, the State's growing population has increased hunting pressure, and sheep have moved into more inaccessible areas (Simeone 2006), a theme echoed by Reckord (1983). Overall, those Ahtna elders interviewed by Simeone reported that sheep populations had declined significantly over time (Simeone 2006). Although Chitina residents had depended heavily on sheep in the past, by the early 1980s, they were hunted far less often (Reckord 1983).

Regulatory regimes have been equally disruptive to the local relationship to sheep. According to Reckord (1983), in the late 1970s and early 1980s, the short mid-summer season contributed to a general reluctance to hunt sheep among residents of Chitina, because it was difficult to transport the meat back to the community before it spoiled. Additionally,

> The game laws that allow only one animal…to be taken also discourage the subsistence usage of sheep. Much effort would have to be invested in the hunt and the rewards would be too small to make sheep hunting a worthwhile subsistence endeavor. The game laws regarding sheep, more than any other species, discourage subsistence use of the species" (Reckord 1983: 89).

An assessment of the eight factors includes consideration of documented use of the resource by communities in the proposal: in this case, use of sheep in the proposal area by residents of Chitina and Kenny Lake. ADF&G, Division of Subsistence periodically surveys communities for their subsistence uses during a single year. These surveys seek to capture all subsistence harvest of fish and wildlife during the survey year under any opportunity, State or Federal.

Chitina has been comprehensively surveyed three times (Stratton and Georgette 1984, McMillan and Cuccarese 1988, La Vine and Zimpelman 2014). Reckord's 1983 study of subsistence in Wrangell-St. Elias National Park and Preserve also contributes to the literature on Chitina's use of sheep, covering the late 1970s to the early 1980s. In 2012, the most recent subsistence survey study year, residents of Chitina harvested an estimated 246 pounds of wild resources per person[1] (La Vine and Zimpelman 2014, ADF&G 2024). Surveyed households harvested an average of eight resources, and used an average of ten resources (La Vine and Zimpelman 2014). The most important species in terms of edible weight were salmon, caribou, and moose (ADF&G 2024).

Surveyed Chitina households did not harvest sheep in any of the three survey years (ADF&G 2025). However, an average of about 8% of surveyed households attempted to harvest sheep across the three survey years (ADF&G 2025). Surveyed Chitina households were documented to have received sheep meat from others in 1987 and 2012, and an average of 11% of households used sheep meat across all three survey years (ADF&G 2025).

Reckord reported that in the late 1970s and early 1980s the upper Kotsina in Unit 11 was the most popular spot for sheep hunting by residents of Chitina, who also looked for sheep in the mountains immediately west of the community in Unit 13 (1983). In 2012, documented sheep search areas for surveyed Chitina households included a small area in Unit 13D close to Chitina and in the Crystalline Hills area along the Chitina McCarthy Road in Unit 11 (La Vine and Zimpelman 2014).

Kenny Lake has also been surveyed comprehensively three times, and is also included in Reckord's study (Reckord 1983, Stratton and Georgette 1984, McMillan and Cuccarese 1988, La Vine and Zimpelman 2014). However, the way in which the community has been defined, and whether this

[1] About 85% of Chitina households were surveyed for that year. The survey included the Strelna area (La Vine and Zimpelman 2014).

definition included the area now within Willow Creek, has changed over time (Stratton and Georgette 1984, La Vine and Zimpelman 2014). The most recent subsistence survey results discussed here represent harvest for both the Kenny Lake and Willow Creek CDPs, which ADF&G Division of Subsistence considered to comprise a single community.

In 2012, the most recent survey year, Kenny Lake/Willow Creek residents harvested an estimated 141 pounds of wild food per person, and surveyed households harvested an average of seven resources and used an average of ten resources[2] (La Vine and Zimpelman 2014, ADF&G 2024). Salmon, moose, caribou, and halibut were the most important resources in terms of edible weight harvested (ADF&G 2024).

Like Chitina, surveyed households in Kenny Lake did not harvest sheep in any of the three survey years (ADF&G 2025). Hunting effort was documented in 2012, when about 5% of surveyed households attempted to hunt sheep (ADF&G 2025). In 2012, about 6% of surveyed Kenny Lake households used sheep, having received it from others (ADF&G 2025). In the early 1970s and 1980s, Kenny Lake residents hunted for sheep "high in the mountains south of the Tonsina River," and in the Chugach mountains, sometimes traveling by road and plane to hunt sheep at more distant locations (Reckord 1983). In 2012, surveyed Kenny Lake/Willow Creek households searched for sheep in a small area around Mankomen Lake in Unit 13C (La Vine and Zimpelman 2014). In 2012, residents of Kenny Lake/Willow Creek both received and gave away sheep meat, and about 6% of households used it (ADF&G 2025).

Because the general season Federal sheep hunts in Unit 11 and 12 do not require a Federal permit, harvest reporting takes place using a State harvest ticket. However, State harvest data were not available at the time this analysis went to print. Since the early 2000s, Federal subsistence regulations have provided a sheep harvest opportunity for people 60 years of age and older in both Units 11 and 12, which has a longer season than the general season hunt. (This is the subsistence elder sheep hunt referred to by the proponent in the Proponent Statement section.) In Unit 11, the elder sheep hunt harvest limit is one sheep, and in Unit 12 the elder sheep hunt harvest limit is one ram with full curl horn or larger. Although residents of Kenny Lake/Willow Creek and Chitina are not eligible for the hunt in Unit 12, a few eligible residents of these communities have applied for and hunted using the Unit 11 elder sheep permit each year, although only one harvest was reported by a Kenny Lake resident in the 15 years from 2010 to 2024 (**Tables 1, 2**).

[2] Thirty-eight percent of Kenny Lake/Willow Creek households were surveyed in 2012 as part of a random sample (La Vine and Zimpelman 2014).

Table 1. Unit 11 Elder Sheep Permits (FS1104) issued to residents of Chitina 2010 to 2024 (Federal Subsistence Permit Database 2025).

Year	Issued	Hunted	Harvested
2010	1	1	0
2011	2	1	0
2012	3	0	0
2013	1	1	0
2014	1	1	0
2015	2	1	0
2016	3	2	0
2017	2	1	0
2018	2	2	0
2019	1	1	0
2020	3	1	0
2021	3	1	0
2022	2	1	0
2023	2	2	0
2024	5	0	0
Total:	**33**	**16**	**0**

Table 2. Unit 11 Elder Sheep Permits (FS1104) issued to residents of Kenny Lake/Willow Creek 2010 to 2024 (Federal Subsistence Permit Database 2025).

Year	Issued	Hunted	Harvested
2010	3	2	0
2011	3	3	0
2012	3	2	0
2013	1	0	0
2014	3	2	0
2015	2	2	0
2016	2	1	0
2017	1	1	0
2018	1	0	0
2019	0	0	0
2020	2	0	0
2021	1	0	0
2022	1	0	0
2023	0	0	0
2024	4	1	1
Total:	**27**	**14**	**1**

Discussion and Effects

If this proposal is adopted, residents of Chitina and Kenny Lake will have their customary and traditional uses of sheep in Unit 12 recognized. They will become qualified to harvest sheep under Federal subsistence regulations on Federal public lands in Unit 12, which includes an elder hunt. Because Chitina and Kenny Lake are already resident zone communities for Wrangell-St. Elias National Park, they would be able to harvest sheep within the portion of Unit 12 within Wrangell-St. Elias National Park. If this proposal is rejected, residents of Chitina and Kenny Lake can continue to hunt for sheep in Unit 12 under State regulations. Additionally, they can continue to hunt for sheep under Federal subsistence regulations in Unit 11, where they are already federally qualified.

OSM PRELIMINARY CONCLUSION

Oppose Proposal **WP26-74**.

Justification

Traditionally, sheep were an important and valued part of the Ahtna diet, particularly during times when other ungulates were unavailable. The Ahtna harvested sheep within their traditional territory, in areas relatively close to their camps and settlements. Increased population and hunting pressure, restrictive regulations, and commercial guiding have all contributed towards interrupting traditional patterns of sheep use in the region.

Over three subsistence surveys between 1982 and 2012, participating Chitina and Kenny Lake households were not found to have harvested any sheep, although hunting effort was documented, and households received sheep from others, and used it. Surveyed households in both communities searched for sheep relatively close to home, although residents of Kenny Lake also searched for sheep in unspecified more distant locations. No search and use areas for sheep were specifically documented in Unit 12 for Chitina or Kenny Lake in the subsistence studies. While Chitina and Kenny Lake have a demonstrated pattern of customary and traditional hunting for sheep, this pattern has not been demonstrated for Unit 12.

LITERATURE CITED

ADF&G. 2024c. Community Subsistence Information System (CSIS 2024). Alaska Department of Fish and Game, Division of Subsistence. https://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=harvInfo.harvestCommSelComm. Retrieved July 9, 2024.

ADLWD (Alaska Department of Labor and Workforce Development), Research and Analysis Section. 2024. Cities and Census Designated Places (CDPs), 2020 to 2024. Retrieved April 21, 2025. https://live.laborstats.alaska.gov/data-pages/alaska-population-estimates

de Laguna, F. and C. McClellan. 1981. Ahtna. Pages 641-663 *in* J. Helm, ed. Handbook of North American Indians. Vol. 6, Subarctic. Smithsonian Institution, Washington DC.

Haynes, T.L. and W.E. Simeone. 2007. Upper Tanana Ethnographic Overview and Assessment, Wrangell St. Elias National Park and Preserve. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 325. Anchorage, AK.

La Vine, R. and G. Zimpelman. 2014. Subsistence Harvests and Uses of Wild Resources in Kenny Lake/Willow Creek, Gakona, McCarthy, and Chitina, Alaska, 2012. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 394. Anchorage, AK.

McKennan, R. A. 1981. Tanana. Pages 562 to 576 *in* J. Helm, ed. Handbook of North American Indians. Vol. 6, Subarctic. Smithsonian Institution, Washington DC.

McMillan, P.O. and S.V. Cuccarese. 1988. Alaska over-the-horizon backscatter radar system: Characteristics of contemporary subsistence use patterns in the Copper River Basin and Upper Tanana area. Vol II. Synthesis. Arctic Environmental Information and Data Center. Anchorage, AK. 224 pp.

OSM. 1998. Staff analysis P98-100. Pages (Eastern Interior) 76–90 in Federal Subsistence Board Meeting Materials. May 4–8. U.S. Fish and Wildlife Service Office of Subsistence Management. Anchorage, AK. 1,449 pages.

Reckord, H. 1983. That's the way we live: Subsistence in the Wrangell-St. Elias National Park and Preserve. University of Alaska Fairbanks, Occasional Paper Number 34. Anthropology and Historic Preservation Cooperative Park Studies Unit. Fairbanks, AK.

Simeone, W.E. 2006. Some Ethnographic and Historical Information on the Use of Large Land Mammals in the Copper River Basin. National Park Service Resource Report, NPS/AR/CRR-2006-56. Copper Center, AK. 56 pages.

Stratton, L. and S. Georgette, S. 1984. Use of fish and game by communities in the Copper River Basin, Alaska: A report on a 1983 household survey. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 107. Anchorage, AK.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission

WP26–77 Executive Summary	
General Description	Proposal WP26-77 requests recognition of the customary and traditional use of wood bison in Units 12, 20, and 25 by the residents of Units 12, 20 and 25. *Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council*.
Proposed Regulation	**Customary and Traditional Use Determination—Wood bison** *Unit 12* — ***Residents of Units 12, 20, 25*** *Unit 20* — ***Residents of Units 12, 20, 25*** *Unit 25* — ***Residents of Units 12, 20, 25***
OSM Preliminary Conclusion	**Support**
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 support** See Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Draft Customary and Traditional Use Analysis
WP26-77

ISSUE

Proposal WP26-77, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) requests recognition of the customary and traditional use of wood bison in Units 12, 20, and 25 by the residents of Units 12, 20 and 25.

Proponent Statement

The proponent states that wood bison were traditionally hunted for subsistence by Alaska Native people for thousands of years. Their use was interrupted only because they ceased to exist in Alaska, not because of a change in patterns of use. Evidence of their traditional use in northeast Alaska exists in oral histories.

The proponent continues that wood bison are currently being reintroduced to the Eastern Interior region and are listed as an experimental population under the Endangered Species Act (ESA). Although no hunting can be allowed until they are delisted, the Council believes their customary and traditional use nevertheless should be recognized. The reintroduction of wood bison provides a chance for cultural practices and use of wood bison to be revitalized in the future.

Current Federal Regulations

None

Proposed Federal Regulations

Customary and Traditional Use Determination—Wood bison

Unit 12	***Residents of Units 12, 20, 25***
Unit 20	***Residents of Units 12, 20, 25***
Unit 25	***Residents of Units 12, 20, 25***

Extent of Federal Public Lands

Unit 12 is comprised of approximately 60% Federal public lands that consists of 36% National Preserve, 12% National Park, 11% U.S. Fish and Wildlife Service (USFWS) and 1% Bureau of Land Management (BLM) managed lands.

Unit 20 is comprised of approximately 21% Federal public lands that consist of 9% National Park, 6% National Preserve, 6% BLM land and less than 1% of USFWS managed lands.

Unit 25 is comprised of approximately 73% Federal public lands that consist of 57% USFWS, 14% BLM and 2% National Preserve managed lands.

Background

Wood bison, *Bison bison athabascae,* once inhabited interior Alaska and Northwest Canada. Oral histories from northeast Alaska indicate that they were part of some Alaska Native subsistence harvests until they ceased to exist in Alaska approximately one century ago (Seaton and Rogers 2025: 1; Stephenson et al.: 2001).

There have been three species of bison present in Alaska at different times.

1.) Wood bison, *Bison bison athabascae* are the focus of this analysis are Wood bison, Holocene era, that once lived in Alaska, ceased to exist and have been reintroduced to Alaska (Seaton and Rogers 2025, Stephenson et al.: 2001).

2.) Steppe bison, *Bison priscus*, now extinct, which were Pleistocene megafauna that lived in Alaska (Smith et al. 2014).

3.) Plains bison*, Bison bison bison* imported to Alaska from the continental United States. These are located at Delta Junction, Copper River, Chitina River, and Farewell (ADF&G 2025a).

The State of Alaska has primary management authority for the reintroduction of wood bison to Alaska in cooperation with Ecological Services at the USFWS. Together, the agencies designed a unique approach to the ESA to bring wood bison back to Alaska. When the idea of reintroduction was first broached, some stakeholders opposed it because the restrictions on Endangered Species (ES) reintroduction can stop other activities such as development and future harvest (Seaton and Rogers 2025: 3, Mahara 2025: 1). The agencies crafted an ES designation specifically for wood bison reintroduction. This designation is guided by the 2014 10(j) rule set forth by the USFWS and the Alaska Department of Fish and Game (ADF&G) (Seaton and Rogers 2025: 1-2). This allows for the reintroduced wood bison to be designated as a Nonessential Experimental Population (NEP). According to a regulatory overview on wood bison provided by the USFWS to the Eastern Interior Council at its February 2025 meeting,

> In order to relieve landowner concerns and regulatory burdens associated with reintroducing wood bison in Alaska, in 2014, the U.S. Fish and Wildlife Service created a special rule for wood bison under sections 10(j) and 4(d) of the Endangered Species Act (ESA). The 10(j) rules allowed us to supersede the generic prohibitions against take under the ESA, replacing them with specific rules for wood bison (USFWS 2025: 1).

This designation is unique because unlike other ESA designations, "…the continued existence of the species does not depend on the experimental [Alaska] populations" (Mahara 2025). These special rules for wood bison and their designation as a NEP made the introduction of the species much less restrictive than typical restorations of endangered species. If this population grows, these specific rules may allow for a legal harvest of wood bison based on sustained yield principles (Mahara 2025). There are two situations under which NEP status can be lifted. The first is if wood bison recover and are delisted under the ESA and the second is if reintroduction programs end and the USFWS and the State of Alaska move to end the NEP designation (Mahara 2025). There is no guarantee of a State or Federal wood bison hunt.

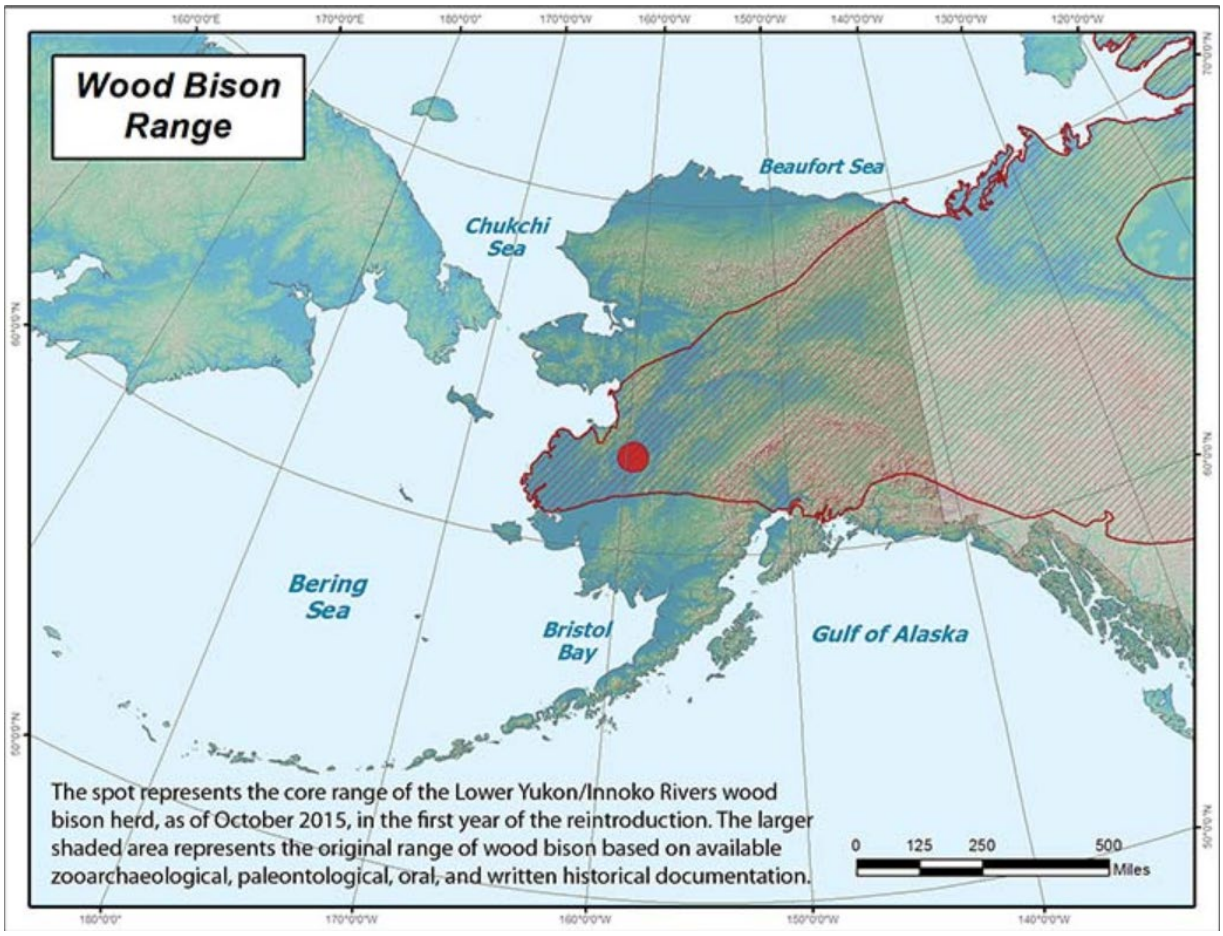
The Council, the proponent of this proposal, is not concerned with harvest and harvest regulations. The Council's proposal is about having their customary and traditional use acknowledged now, for the future. This is important to many rural Alaskans, who are unable to harvest species for a variety of reasons, because they see documentation of their uses in State and Federal fish and wildlife regulatory systems as critical to resuming access to these species, if and when it becomes possible.

As of now, in June 2025, there are no State or Federal hunts for wood bison in the Eastern Interior region. The Council's request for recognition of customary and traditional subsistence uses of wood bison in the Eastern Interior Region was made with full acknowledgment and awareness that there will be no harvest of this species under Federal subsistence regulations until wood bison are delisted from the ESA and if they someday inhabit Federal lands in sufficient numbers (EIRAC 2025: 100-102).

Stephenson et al. 2001 write that wood bison once inhabited Interior Alaska, were a subsistence resource for residents of that part of the state and the last reported sightings in Alaska occurred at the end of the 19th century. They were first listed as Endangered Foreign Fish and Wildlife under the 1969 Endangered Species Conservation Act. Because they were on this list, they were included as an endangered species under the 1973 ESA. In 2012, wood bison were reclassified as threatened due to the conservation efforts of Canada's National Wood bison Recovery team (Seaton and Rogers 2025; Mahara 2025).All the wood bison reintroduced to Alaska are from Canada where a remnant population survived after their disappearance from Alaska. For this reason, the recovery of these two populations is linked. Currently there are approximately 8,500 free-range wood bison in Canada. In Alaska, there are two reintroduced populations. As of 2023, there are approximately 72 bison in the Lower Innoko/Yukon area and in May 2025, 61 wood bison were released at Minto Flats (ADF&G 2025b). Planning is in progress for a potential release in the Yukon Flats (Seaton and Rogers 2025: 5). The reintroduction of wood bison to Alaska is guided by a required recovery plan that considers the health and recovery of the populations of wood bison in Alaska and Canada jointly; wood bison are listed range-wide (both Canada and Alaska) which means that the recovery of the herds is interdependent (Mahara 2025). For this reason, the USFWS plans to adopt Canada's 2018 Recovery Strategy which will also address the requirements of the ESA (Mahara 2025).

The State of Alaska, Division of Wildlife Conservation is leading an extensive public planning process regarding the reintroduction of wood bison in three regions of the interior LIST THEM. In general,

public reaction to the reintroduction is mixed. While some rural community members, state hunting groups and conservationists strongly support reintroduction, Tanana Chiefs Conference (TCC), Doyon and some community leaders from each Unit and even some Council members do not support the reintroduction of wood bison (ADF&G 2005a, TCC 2024:16).



Map 1. Estimated original range of wood bison based on available zooarchaeological, paleontological, oral, and written historical documentation (ADF&G 2025 based on data from Stephenson et al. 2001).

Regulatory History

There is no Federal regulatory history for the subsistence harvest and/or use of Wood bison in Alaska.

Current Events

In March 2025, the Alaska Board of Game adopted Proposal 88 to add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by the Department of Fish and Game.

Community Characteristics

Unit 12

The rural communities in Unit 12 include Chisana, Nabesna, Northway, Tanacross, Tetlin, Tok, Slana and Mentasta Pass. All these communities are on the Alaska Highway System. The subsistence practices of these communities are a blend of Ahtna, Upper Tanana and Tanacross Athabascan traditions and those of Euroamerican settler/homesteaders. Subsistence harvests in these communities are dominated by large land mammals, fish, small land mammals, birds and plants (Godduhn and Kostick 2016:58-61, Holen et al. 2012, Marcotte 1991, Haynes et al. 1984).

Unit 20

Unit 20 encompasses a wide swath of Alaska. The rural communities in Unit 20 include Anderson, Healy, Big Delta, Chicken, Clear, Delta Junction, Dot Lake, Ferry, Fort Greely, Healy Lake, Livengood, Lake Minchumina, Manley Hot Springs, Minto, Nenana, Rampart, Tanana, and Eagle. Three of these communities, Lake Minchumina, Rampart and Tanana are not on the Alaska Highway system and are accessible only by plane, boat, or snowmachine. The subsistence practices of these communities are diverse and are a blend of Han, Tanana, Gwich'in, Koyukon, and Ahtna Athabascan traditions and those of Euroamerican settler/homesteaders. Subsistence harvests in these communities are dominated by large land mammals, fish, small land mammals, birds and plants (Trainor et al. 2020, Brown et al. 2016, Brown et al. 2014, Holen et al. 2012, Holen et al. 2006).

Unit 25

The rural communities in Unit 25 include Arctic Village, Venetie, Fort Yukon, Chalkyitsik, Canyon Village, Beaver, Birch Creek, Stevens Village, Circle and Circle Hot Springs. Circle and Circle Hot Springs are the only two Unit 25 communities on the Alaska Highway system. All the other communities are only accessible by plane, boat or snowmachine. The subsistence practices of these communities are diverse and are a blend of Gwich'in and Koyukon Athabascan traditions and those of Euroamerican settler/homesteaders. Subsistence harvests in these communities are dominated by large land mammals, fish, small land mammals, birds and plants (Trainor et al. 2020, Van Lanen et al. 2012, Sumida 1990, Sumida 1989, Sumida 1988, Sumida and Alexander 1985, Caulfield 1983).

Eight Factors for Determining Customary and Tradition Use

A community or area's customary and traditional use is generally exemplified through these eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices

due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

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

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

It is important to note here that one of the eight factors for determining customary and traditional use specifically applies to wood bison in Alaska, and that is, 1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area. Wood bison have been absent from Alaska for at least 200 years, if not longer. Stephenson et al. 2001 present compelling oral histories regarding wood bison from Units 20 and 20E.

With or without oral histories, the absence of specific memories or records of past use of a species does not erase the possibility of customary and traditional uses of introduced and reintroduced species. Basic to the rural Alaskan subsistence lifestyle is that people must harvest what shows itself to them; they use what is there.

As noted by the Office of Subsistence Management (OSM),

> There are many examples of species such as reindeer being introduced, reintroduced, or moving into new areas, and subsequently being adopted into the local subsistence round, so long as opportunity is provided. Moose began moving into the Seward Peninsula in the 1940s following major fires in the region, and harvest of this species grew as their population increased (Thomas 1982; SPRAC 2019a, 2019b; Braem et al. 2017; Tape et al. 2016). In another example, residents of Kaktovik began to hunt muskoxen after their reintroduction and were subsequently recognized by both the

> State and the Federal subsistence program as having customary and traditional use of the species. Muskoxen were first reintroduced to the Seward Peninsula in 1970 (Machida 1997), and over time, residents of Unit 22 have incorporated them into their seasonal round (OSM 2025: 6-7).

OSM noted similar practices on Kodiak Island,

> The traditional subsistence economies of the Alutiiq/Sugpiaq were based on the harvest of marine and freshwater resources such as marine mammals, non-salmon fish, shellfish, sea or littoral birds and their eggs, and salmon (Sill et al. 2021, Clark 1998). The current subsistence practices of the rural residents of Kodiak and Afognak Islands still reflect the cultural traditions of the Alutiiq/Sugpiaq, as well as those of Eastern European, Asian, and American settlers. Commercial fishing and processing have also been an important industry in the area since the 1800s (Sill et al. 2021). Large land mammals have traditionally been secondary components of local subsistence economies on Kodiak and Afognak Islands, as only the Kodiak brown bear (*Ursus arctos middendorffi*) is native to this area (USFWS 2023). Deer, elk, and mountain goats were all introduced to the area in the early-to- mid-1900s (Sill et al. 2021). Deer in particular have been increasingly integrated into the seasonal round of subsistence harvest activities by Kodiak Island communities since their introduction in 1924 (Sill et al. 2021). Deer are now the most dominant and important large land mammal species utilized by Kodiak Island residents in their subsistence efforts (Svoboda and Crye 2020, Sill et al. 2021). Recent comprehensive subsistence harvest surveys conducted in Kodiak Island communities by ADF&G have consistently shown the importance of deer in terms of household utilization and overall bulk contribution to subsistence diets (OSM 2024).

In 2024, the anthropologist at Wrangell St. Elias National Park and Preserve interviewed two elders from the Upper Tanana region, one from Northway and one from Nabesna in 2024. Both had heard stories from elders about “an animal that some referred to as water buffalo in the Nabesna area” but neither included accounts of hunting or other uses of the animals (Cellarius 2025). These elders and others sometimes refer to wood bison as “buffalo”.

Comments on this draft received from the Alaska Department of Fish and Game, Division of Subsistence indicate that during more than 40 years of subsistence research in rural Alaska and more than 800 interviews conducted in Interior Alaska, no one has mentioned wood bison. A 2025 search of the Division of Subsistence Community Subsistence Resource Information System and a word search for bison and buffalo also yielded no results.

Currently, there appears to be only one source with information with oral histories about wood bison in Alaska. It is an interdisciplinary paper co-authored by Alaskans who were/are leaders in their fields, archaeologists, biologists, paleontologists. The first author of this paper is the late Robert O. Stephenson, a wildlife biologist with ADF&G. His obituary describes him as “…one of the first to integrate traditional knowledge with modern wildlife science” (Brainerd et al 2016: 13)

The “recent” use of wood bison as part of historic Athabascan subsistence harvests in Alaska was not well known by researchers until recently. In 1991, a resident of Fort Yukon told Robert O. Stephenson ADF&G biologist and lead author of Stephenson et al. 2001 the stories his mother told him of the time when wood bison lived near Fort Yukon (Stephenson et al. 2001: 127). After this conversation, the team of interdisciplinary researchers began to search for more people who might have knowledge of wood bison. Initially, nine Alaskan Athabascan elders, residents of communities in Units 20 and 25 were interviewed. In Unit 20, the interviewees were residents of the communities of Tanana, Nenana and Minto and interviewees in Unit 25 were residents of Fort Yukon, Venetie, Chalkyistik, Birch Creek and Beaver (Stephenson et al. 2001: 127). The general results of this study, independently reviewed by non-participant researchers, follow:

> Athabascan elders residing in the upper Yukon and Tanana River drainages in interior Alaska provided oral accounts referring to late Holocene [last 11,700 years] [wood] bison. Consistent oral narratives provided by multiple elders indicate bison were present and hunted in parts of interior Alaska within the last few hundred years. There are a number of persistent themes in the oral narratives that provide insight into the late Holocene distribution, human use, and disappearance of wood bison in Alaska (Stephenson et al. 2001: 127).

Thirteen Athabascan elders, both men and women, provided accounts of wood bison as an aspect of the historic subsistence harvests of their ancestors (Stephenson et al. 2001: 147). The accounts describe the subsistence harvest and use of wood bison in the upper Yukon drainage, the Tanana drainage and more specifically, “the flats along the Yukon River from the vicinity of Beaver east to the lower Chandalar, Porcupine and Black River drainages in the vicinity of Fort Yukon, the Hodzana River drainage northwest of Beaver, the Grayling Fork area in the upper reaches of the Black River and the flats adjacent to the Tanana River” (Stephenson et al. 2001: 128).

These oral history accounts demonstrate Traditional/Indigenous knowledge of wood bison a generation after wood bison ceased to exist Alaska. Wood bison were used for food, clothing, bedding, floor coverings; their hair was used for sewing and stitching cuts. Hunters harvested them with bows and arrows and spears and used snowshoes and dogs to pursue them. In some locations, drives were used to harvest large numbers of bison (Stephenson et al. 2001: 128-131,139). A couple of elders referred to the era of wood bison harvest as, “the skin clothes days” (Stephenson et al. 2001: 128,131).

The interdisciplinary study by Stephenson et al. in 2001 included Traditional/Indigenous Knowledge bearers, archeologists, paleontologists, biologists, and linguists. An important facet of the knowledge of wood bison includes the linguistic categories and other means of specifying between bison and muskoxen. The Reverend David Salmon of Chalkyitsik provided a detailed account summarized by researchers:

> Gwich’in names for bison include *Dachantee aak’ii* which he translated as ‘cow in the forest’, and *Ch’atthaii dgahan choo*, which he translated as ‘large animal with a hump’. He indicates these terms could be applied to either muskoxen or bison, emphasizing that only bison occurred on the Yukon Flats. Rev. Salmon explained that

> these two animals were distinguished in conversation because of the distinctive shape of their horns and clarified any ambiguity regarding the name *Dachantee aak'ii*. He describes the characteristic downswept horns which 'cover the head' of a muskox, contrasting them with the upwardly curving horns of bison. When referring to muskoxen the speaker would typically place an open palmed right hand above the ear, move it gently downward over the ear then then out and up in an arc, indicating the downswept curve and upturned end of the horn. When referring to a wood bison, a hunter would extend and slightly curve the first and second fingers, placing them against the upper temple, indicating the outward and upward curve of wood bison horns. The phrase '*Dachantee aak'ii viji viji noiinjik*' means 'cow in the forest with the horn that sweeps downward to protect the head.' In contrast, the phrase '*Dachantee aak'ii viji neekwaii gwanlii'* means 'cow in the forest with two short horns turning upward'. Rev. Salmon stated that even during the early 1900's, hunters discussing bison or muskoxen would qualify the term with the hand sign, adding that Gwich'in people in a large region extending from Fort McPherson [Canada] to Fort Yukon commonly used the term *Dachantee aak'ii* accompanied by the hand sign to denote wood bison (Stephenson et al. 2001: 129)

The stories Rev. Salmon told were stories he had heard from multiple elderly relatives who said Yukon Flats people depended on wood bison, likely before moose populated the area. He reported that mosquitoes did not irritate bison because of their long hair. He said they were a 'good animal' because they were an important source of food and other materials. He frequently repeated that the Yukon Flats "is their country…they belong to it" (Stephenson et al. 2001: 129). Rev. Salmon and several of his relatives have found bison bones in riverbeds in the Yukon Flats.

In addition to the linguistic data Rev. Salmon shared, other elders provided slightly different Gwich'in names and translations for bison: *Dachantee aak'ii* was translated as 'muskox among timber' and *Dachantee qwaak'ii*, 'the hefty one among timber' (Stephenson et al. 2001: 128). Other terms include, *Ch'itthay dighan* for big, humped animal or "humped meat," *Nan'aak'ii choo*, "large animal" or "big hefty one on the land" (Stephenson et al. 2001: 128).

Julia Tritt of Venetie provided another name for bison and provided details of wood bison harvest and use on the Yukon Flats:

> The late Julia Tritt of Venetie recounted stories told by her grandfather and other elders about how 'buffalo' were hunted on the Yukon Flats. She referred to bison as the 'big animal' stating that elders often remarked on the animal's 'big head,' long tail and large size. She said hunters often found their large, round tracks in the snow. They were said to be fairly easy to hunt and kill with bow and arrow or spears, and dogs were also used to help bring them down. Bison were sometimes caught in, and often ruined, snares set for moose or caribou. These snares were often not strong enough to hold them. She said bison were 'good eating' and provided high quality food for

> people. Sewing thread was made by plaiting together several of the longest hairs, and a single bison hair was used to suture cuts on people. Mrs. Tritt said bison hides were hard to tan compared to those of other animals and were sometimes only partially tanned and used to cover the floor in a dwelling. She said that bison eventually disappeared or left the country. Mrs. Tritt indicated these accounts pertained to the early 1800's and earlier (Stephenson et al.: 131).

Unlike Mrs. Tritt, other elders preferred bison hides to those of other animals:

> Mrs. Virginia Titus provided stories regarding the presence of bison in interior Alaska that were conveyed to her by her father and grandfather…Her father travelled extensively between Tanana and Fort Yukon. Her father heard many stories about bison and their value to people in the 'skin clothes days' when animal skins were the only materials available for clothing. She was told that bison were once common and widespread in Alaska, although they were found mostly at low elevation and were scarce in the mountains. The flats in the Tanana and Yukon drainages were said to support bison in the early days. According to Mrs. Titus, bison were second only to moose as a source of food and were an important source of material for clothing and shelter as well. Bison had a 'big head', and the hides were tanned with the hair on to make warm robes and clothing. The hair was soft, and bison hides were preferred for clothing because they did not cause allergic reactions in people. Mrs. Titus said these stories described the presence of bison in the 1700s and into the early 1800s as well as earlier. Her grandfather said bison were hunted with bow and arrow, with spears, with the aid of snowshoes in winter, and with the aid of dogs. She adds that there was more snow in the early days, noting this may have increased the vulnerability of bison to hunters. She indicated that the disappearance of bison in this region was due to hunting stating, 'they were easy to kill, that's why they are not here". Mrs Titus recalled the name for bison as '*nan'aak'ii choo'* which she translated as 'big animal'.

Another elder, Moses Cruikshank of Beaver provided an account of wood bison:

> Mr. Moses Cruikshank of Beaver said there were many Gwich'in stories describing how bison inhabited the Yukon Flats in the old days when, 'big herds' of these animals occurred in the area. Large numbers of bison were sometimes killed in the fall when much of the meat was dried and 'used all winter long'. A story attributed to Chief Christian [from Arctic Village] relates to 'a mountain up in the Sheenjek River country' called 'Buffalo Shirt Mountain'. Mr. Cruikshank said a 'large herd of bison came through and covered the mountain like a shirt' at this location. Bison were hunted there for several years and were guided by fences down on the flats and driven over a cliff. Mr. Cruikshank said many bison were killed during this period. He noted that the taking of large numbers of bison by people at 'Buffalo Mountain' occurred sometime before Chief Christian was born and before firearms were generally

> available. Rev. Salmon indicates that Chief Christian was born about 1855 and was 93 years old when he died… Mr. Cruikshank further states that a strong bow was required to kill bison and that bison hunting was sometimes dangerous (Stephenson et al. 2001: 130).

It is noteworthy that the residents of Venetie described this same placename to a United States Geological Survey engineer in 1956. The engineer was there specifically to document placenames and was told that the English name of a nearby mountain was "Buffalo Shirt". The residents explained that buffalo had been hunted there by being "driven over an escarpment". The engineer reported that the people made it extremely clear that they had never seen buffalo but they were highly aware of the difference between buffalo/bison and muskoxen (Stephenson et al. 2001: 139).

This place name demonstrates the power of customary and traditional uses, no longer practiced, written on the land and remembered through oral histories. Its mention by the people interviewed in the 1990's shows that the body of Traditional/Indigenous knowledge of wood bison, of life, is discussed and shared across miles, communities and time. This tells us that it was important to keep, not for researchers, but for the identity of those who hold and share the customary and traditional knowledge of this species that sustained their ancestors.

It is important to note here that not all rural Alaskans are in favor of the reintroduction of wood bison. ADF&G Division of Wildlife Conservation has conducted extensive outreach with residents of the Upper and Lower Tanana and Yukon Flats regions. Three workshops were held in 2023 in Tok and Fairbanks. Some participants supported the reintroduction of wood bison in their area. Others were concerned about the effects of wood bison on other species such as muskrats, berries, mushrooms and other plants. A representative from Northway stated opposition and for some, harvest allocation was an issue of concern. Others expressed concerns about an influx of outside people arriving to harvest wood bison and some mentioned co-management (Bath 2023a, Bath 2023b, Bath 2022).

In 2024, Tanana Chiefs Conference passed Resolution 2024-27 that articulated issues like those voiced in the workshops. These include concern from Doyon that "ADF&G exaggerated potential benefits to locally affected communities and failed to address allocation, impact to resource development, and trespass issues;". The resolution states that "The Innoko herd was reintroduced over 10 years ago, yet the promises made by ADF&G regarding the benefits to tribes have not been realized and it has yet to be determined if wood bison herds can be successfully established". Regarding oral histories, the resolution is clear that "Wood bison are not part of the oral history or stories of the Nenana Tribe, whose local elders tell stories of their grandparents' way of life that do not include wood bison…". The entire 3-page resolution is attached as **Appendix 1**.

Discussion and Effects

If this proposal is adopted, the customary and traditional use of wood bison in Units 12, 20, and 25 will be recognized for residents of Units 12, 20 and 25. The proponent, the Council, has no expectation of a wood bison hunt at this time.

OSM PRELIMINARY CONCLUSION

Support Proposal WP26-77

Justification

The oral histories in Stephenson et al. 2001 provide compelling data regarding traditional knowledge and the customary and traditional uses of wood bison. These oral histories chronicle the historic but interrupted customary and traditional use of wood bison by the residents of Units 20 and 25. Although very little information regarding customary and traditional use of wood bison in Unit 12 has been identified, wood bison occurred historically in present-day Unit 12, and, as demonstrated with other resources across Alaska, customary and traditional uses of other introduced and reintroduced species have been recognized because rural Alaskans harvest what is available to them.

LITERATURE CITED

ADF&G. 2025a. Plains bison. https://www.adfg.alaska.gov/index.cfm?adfg=plainsbison.main Retrieved July 25, 2025.

ADF&G. 2025b. New Bison herd released onto Minto Flats State Game Refuge. News release. Division of Wildlife Conservation. May14, 2025. https://newsrelease.adfg.alaska.gov/static/applications/publicnotification/2025/releases/R3-AA-25-3329.pdf. Retrieved July 16, 2025.

Bath, A.J. 2023a. Results from an applied human dimensions facilitated workshop discussion regarding possible Alaska wood bison restoration for the Upper Tanana Drainage Area. Tok, AK. 2023. 55pp.

Bath, A.J. 2023b. Results from an Applied Human Dimensions Facilitated Workshop Discussion regarding possible Alaska Wood Bison Restoration for Yukon Flats: Workshop held in Fairbanks, Alaska. 2023. 55 pp.

Bath, A.J. 2022. Results from an applied human dimensions facilitated workshop discussion regarding Alaska wood bison restoration for the Lower Tanana. Fairbanks, AK. 41pp.

Brainerd, S., D. Shideler and J. Trent. 2016. In Memoriam, Robert O. Stephenson, 1945-2016. The Alaskan Wildlifer. Winter Issue. https://www.researchgate.net/profile/Scott-Brainerd/publication/313987424_In_Memoriam_-_Robert_O_Stephenson_1945-2016/links/58b098d192851cf7ae8bb17a/In-Memoriam-Robert-O-Stephenson-1945-2016.pdf. Retrieved July 3, 2025.

Brown, C.L., N.M. Braem, M.L. Kostick, A. Trainor, L.J. Slayton, D.M. Runfola, E.H. Mikow, H. Ikuta, C.R. McDevitt, J. Park, and J.J. Simon. 2016. Harvests and uses of wild resources in 4 Interior Alaska communities and 3 Arctic Alaska communities, 2014. ADF&G Division of Subsistence, Technical Paper No. 426.

Brown, C.L., L.S. Slayton, A. Trainor, D.S. Koster, and M.L. Kostick. 2014. Wild resource harvests and uses, land use patterns, and subsistence economies in Manley Hot Springs and Minto, Alaska, 2012. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 400, Fairbanks.

Caulfield. R.A. 1983. Subsistence land use in Upper Yukon-Porcupine communities, Alaska. ADF&G. Div. of Subsistence. Tec. Paper No. 16. Fairbanks, AK. 252 pages.

Clark, D.W. 1998. Kodiak Island: The later cultures. Arctic Anthropology 35(1): 172-186.

Cellarius, B. 2025. Anthropologist. Personal communication: email. Wrangell St. Elias National Park and Preserve. Copper Center, AK.

Godduhn, A. and M. Kostick. 2016. Harvest and use of wild resources in Northway, Alaska, 2014 with special attention to nonsalmon fish. ADF&G, Div. of Subsistence Tech. Paper No. 421. Fairbanks, AK.

Haynes, T., M. Case, J. Fall, L. Halpin, and M. Robert. 1984. The use of Copper River salmon and other wild resources by Upper Tanana communities. ADF&G, Div. of Subsistence Tech. Paper No. 115. Fairbanks, AK.

Holen, D, S.M. Hazell, and G. Zimpelman. 2015. The harvest and use of wild resources in selected communities of the Copper River Basin and East Glenn Highway, Alaska, 2013. ADF&G, Div. of Subsistence Tech. Paper No. 405. Anchorage, AK.

Holen, D.; Sarah M. Hazell; David S. Koster. 2012. Subsistence harvests and uses of wild resources by communities in the eastern Interior of Alaska, 2011. ADF&G Division of Subsistence, Technical Paper No. 372.

Holen, D, William E. Simeone, and Liz Williams. 2006. Wild resource harvests and uses by residents of Lake Minchumina and Nikolai Alaska, 2001-2002. ADF&G Division of Subsistence, Technical Paper No. 296.

Mahara, Carol. 2025. Wood bison: Regulatory Overview. US Fish and Wildlife Service. Ecological Services. Anchorage, AK. 15pp.

Marcotte, J. 1991. Wildlife fish and game harvest and use by residents of five Upper Tanana communities, Alaska 1987-88. ADF&G, Div. of Subsistence Tech. Paper No. 168. Juneau.

OSM. 2025. Draft staff analysis of WP26-62a. PP tbd in Federal Subsistence Board Meeting Materials. Dates tbd. Office of Subsistence Management. DOI, PMB. Anchorage, AK.

OSM. 2024. Staff analysis of WP24-11. Supplemental materials. 19 pp. Federal Subsistence Board Meeting Materials. April 2-5, 2024. Office of Subsistence Management. DOI, PMB. Anchorage, AK.

Potter, B. and C. Holmes. 2014. Technology and economy among the earliest prehistoric foragers in Eastern Beringia. https://www.researchgate.net/publication/283604032_Technology_and_economy_among_the_earliest_prehistoric_foragers_in_interior_Eastern_Beringia. Retrieved August 1, 2025.

Seaton, T. S., and L. R. Rogers. 2025. Wood bison management plan for the Lower Tanana River Drainage, 2025. Alaska Department of Fish and Game, Wildlife Special Publication ADF&G/DWC/WSP-2025-1, Juneau, AK. 64 pp.

Sill, L.A, J.M. Keating, and G.P. Neufeld. 2021. Harvest and Use of Wild Resources in Akhiok, Old Harbor, and Larsen Bay, 2018. ADF&G Division of Subsistence. Technical Paper 477. Anchorage, AK.

Smith, H.L., J. Rasic and T. Goebel. 2014. Biface traditions of northern Alaska and their role in the peopling of the Americas. https://www.academia.edu/8711743/Biface_Traditions_of_Northern_Alaska_and_Their_Role_in_the_Peopling_of_the_Americas Retrieved July 28, 2025.

Stephenson, R. O., S. C. Gerlach, R. D. Guthrie, C. R. Harington, R. O. Mills, and G. Hare. 2001. Wood bison in late Holocene Alaska and adjacent Canada: Paleontological, archaeological and historical records. Pages 124–158 [*In*] S. C. Gerlach, and M. S. Murray, editors. People and wildlife in northern North America: Essays in honor of R. Dale Guthrie. BAR International Series 944, Archaeopress, Oxford, England.

Sumida, V. A. 1990. Patterns of fish and wildlife use for subsistence in Fort Yukon, Alaska. ADF&G. Div. of Subsistence. Tech. paper No. 170. Fairbanks, AK. 90 pp.

Sumida, V. A. 1989. Patterns of fish and wildlife harvest and use in Beaver, Alaska. ADF&G. Div. of Subsistence. Tech. paper No. 140. Fairbanks, AK. 96 pp.

Sumida. V. A. 1988. Land and resource use patterns in Stevens Village, Alaska. ADF&G, Div. of Subsistence. Tech. Paper No. 129. Fairbanks, AK. 218 pp.

Sumida. V. A. and C. Alexander. 1985. Moose hunting by residents of Beaver, Birch Creek, Fort Yukon, and Stevens Village in the western GMU 25(D) permit moose hunt area. ADF&G, Div. of Subsistence. Tech. paper No. 121. Juneau, AK. 27 pp.

Svoboda, N. and J. R. Crye. 2020. Deer Management Report and Plan, Game Management Unit 8: Report Period 1 July 2011-30 June 2016, and Plan Period 1 July 2016-30 June 2021. ADF&G. Juneau, AK.

Trainor, A. B.M. McDavid, J. Park, H.S. Cold and D. Koster. 2020. The harvest and use of wild foods by four communities bordering the Yukon-Charley Rivers National Preserve: Central, Circle, Eagle, and Eagle Village, 2016 and 2017. ADF&G, Div. of Subsistence Tech Paper No.469. Fairbanks, AK. 380 pp.

USFWS. 2025. Wood bison in Alaska, frequently asked questions. Prepared for the Eastern Interior Regional Advisory Council Winter 2025 meeting. February 19-20, 2025. Anchorage, AK. 6pp.

USFWS. 2004. Kodiak National Wildlife Refuge: draft revised comprehensive conservation plan and environmental impact statement. Report. Kodiak National Wildlife Refuge, U.S. Fish and Wildlife Service. Kodiak, AK. 735 pp.

Van Lanen, J., C. Stevens, C. Brown, K. Maracle, and D. Koster. 2012. Subsistence land mammal harvests and uses, Yukon Flats, Alaska: 2008-2010 harvest report and ethnographic update. ADF&G, Div. of Subsistence. Tech. paper No. 377. Fairbanks, AK. 203 pp.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission

APPENDIX 1

RESOLUTION 2024 - 27
Tanana Chiefs Conference Full Board of Directors

Tanana Chiefs Conference

OPPOSING THE RELEASE OF WOOD BISON IN THE LOWER TANANA

WHEREAS, Tanana Chiefs Conference (TCC) is an Alaska Native tribal health and social services consortium established by the Interior Alaska tribes and tribal communities, to provide a unified voice in advancing sovereign tribal governments through the promotion of physical and mental wellness, education, socioeconomic development and culture of the Interior Alaska Native; and

WHEREAS, Alaska Fish and Game (ADF&G) designated the Lower Tanana River area as one of the approved locations for the release of bison in the 2013 Environmental Assessment and associated 10(j) rule for wood bison in Alaska; and

WHEREAS, In 2023, the ADF&G resumed the concept of restoring bison in the lower Tanana drainage, initiating a site-specific public planning process; and

WHEREAS, The Environmental Assessment that was developed in cooperation with the US Fish and Wildlife Service that ADF&G is using to guide restoring the bison is obsolete from over 10 years ago in 2013, had a narrow focus and is not integrated with environmental consequences or impacts; and

WHEREAS, The Environmental Assessment states that the State of Alaska will not consider reintroducing wood bison to Alaska in the absence of Federal regulatory assurance to land owners and land managers that such action will not adversely affect resource development activities, and ADF&G will develop site specific wood bison management plans in cooperation with other State and Federal agencies, land owners, local residents, wildlife conservation, and other stakeholders; and

WHEREAS, Doyon, Limited in January 2024 expressed concern regarding the ADF&G's wood bison project, stating that ADF&G exaggerated potential benefits to locally affected communities and failed to address allocation, impact to resource development, and trespass issues; and

WHEREAS, The Innoko herd was reintroduced over 10 years ago, yet the promises made by ADF&G regarding the benefits to Tribes have not been realized and it has yet to be determined if wood bison herds can be successfully established; and

WHEREAS, The Tribes in the Tanana Chiefs Conference region are currently facing food security concerns due to the Yukon River salmon disaster and not being able to fish for the last four years. Tribes face difficulties with the high cost of living, and substituting salmon with other local animals due to the lack of moose or increased competition from outside hunters; and

WHEREAS, Trespass of outside hunters on our traditional lands, which the State fails to address. Adding additional animals to be hunted will make trespass harder to control, placing the burden on Tribes and corporations; and

WHEREAS, The release of wood bison into the Lower Tanana area would increase pressure from outside hunters, leading to trespass issues and reducing the ability for Tribes to harvest traditional foods on their lands; and

WHEREAS, Wood bison are not part of the oral history or stories of the Nenana Tribe, whose local elders tell stories of their grandparents' way of life that do not include wood bison; and

WHEREAS, The State of Alaska passed House Bill 123 that codifies in law the state recognition of federally recognized Tribes, and ADF&G did not conduct proper government-to-government consultation with Tribes regarding the release of wood bison into the Lower Tanana area in align with the ADF&G Tribal Consultation policy signed in 2002; and

WHEREAS, in 2002, ADF&G implemented a policy on "Government-to-Government Relations With the Federally Recognized Tribes of Alaska," that states the Department and Boards are committed to consulting with tribes in Alaska prior to taking action or undertaking activities that affect a Tribe or Tribes and shall favor meaningful participation of the affected Tribe; and

WHEREAS, It is a management failure to introduce additional animals into an ecosystem when ADF&G is failing to adequately manage the current animal populations on our traditional lands.

NOW THEREFORE BE IT RESOLVED that the Tanana Chiefs Conference Full Board of Directors opposes the release of wood bison into the Lower Tanana area and calls upon ADF&G to cease any further actions on this effort until ADF&G has:

1. Conduct proper government-to-government consultation with Tribes in alignment with the Tribal Consultation Policy signed in 2002 regarding the determination of the release, allocation, and traditional and ceremonial use of the wood bison, and provides a report with how the Tribal consultation will be incorporated; and

2. Conduct an updated Environmental Assessment that evaluates the potential environmental and cultural effects in the three areas where wood bison are targeted for reintroduction and includes legacy data over the past decade on the Innoko wood bison herd and integrate that data into the development of alternatives, and invite Tribes to be cooperative agencies; and

3. Completes thorough assessments of potential and long term impacts of wood bison on the ecosystem, and that data is shared with Tribes; and

4. It has been proved through the Innoko herd that wood bison herds can be successfully reestablished and there are successful hunts that benefit the food security of local Tribes; and

BE IT FINALLY RESOLVED that the Tanana Chiefs Conference Full Board of Directors agrees that ADF&G should allocate more resources toward addressing the decline in the moose population over the past four years, and stands in unity with Doyon, Limited's position that a more efficient use of state resources would be to focus on existing fish and wildlife within the state rather than continuing ADF&G's project to import an animal that has historically failed.

CERTIFICATION

I hereby certify that this resolution was duly passed by the Tanana Chiefs Conference Full Board of Directors on March 13, 2024 at Fairbanks, Alaska and a quorum was duly established.

Robert Wright Sr.

Robert Wright, Sr.
Secretary/Treasurer

Submitted by: Nenana Native Association & Manley Traditional Council

FISHERIES RESOURCE MONITORING PROGRAM

INTRODUCTION

The Fisheries Resource Monitoring Program (Monitoring Program) is a collaborative, interagency, interdisciplinary approach to enhance fisheries research and data in Alaska and effectively communicate information needed for subsistence fisheries management on Federal public lands and waters. In 1999, the Federal government assumed responsibility for management of subsistence fisheries on Federal public lands and waters in Alaska. Section 812 of the Alaska National Interest Lands Conservation Act (ANILCA) directs the Departments of the Interior and Agriculture to research fish and wildlife subsistence uses on Federal public lands and waters and to seek data from, consult with, and incorporate knowledge of rural residents engaged in subsistence. The Secretaries of the Interior and Agriculture are committed to increasing the quantity and quality of information available to manage subsistence fisheries; meaningful involvement by federally-recognized tribes and Alaska Native and rural organizations; and, collaboration among Federal, State, Alaska Native, and rural organizations.

Every two years, the Office of Subsistence Management announces a notice of funding opportunity for investigation plans addressing subsistence fisheries on Federal public lands. The Monitoring Program is administered through regions to align with stock, harvest, and community issues common to a geographic area. There are six distinct Monitoring Program regions (**Figure 1**) as well as a multi-region category for projects that encompass more than one region.

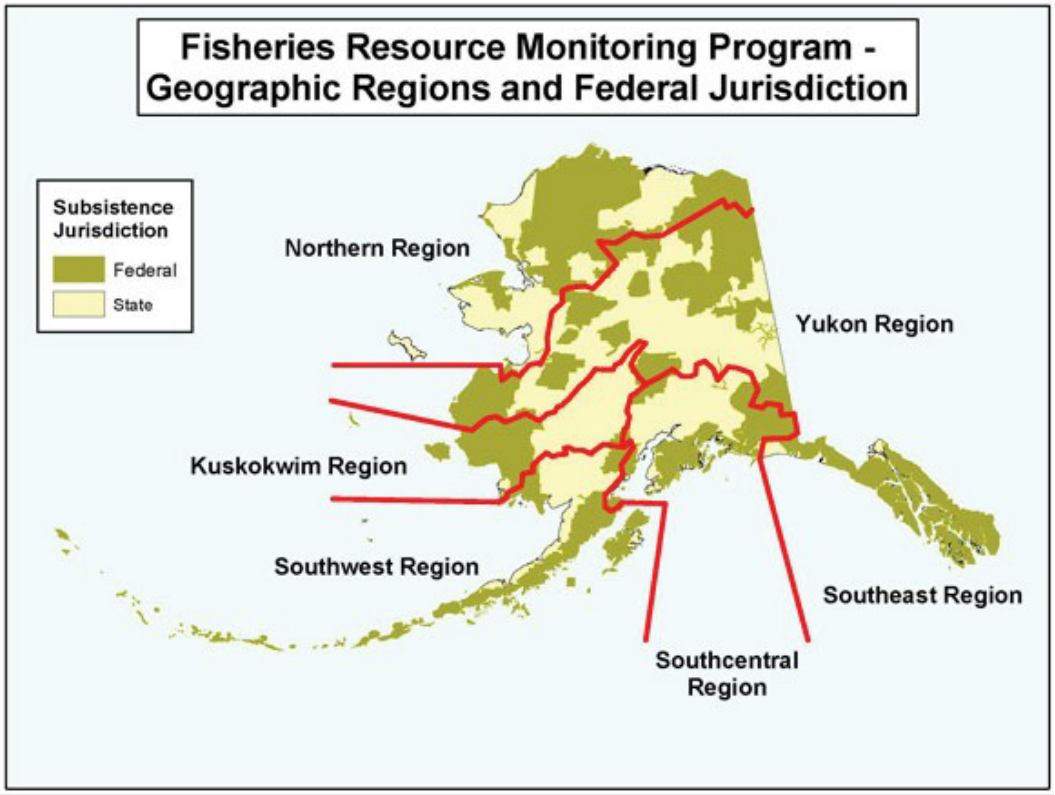


Figure 1. Geographic regions of the Fisheries Resource Monitoring Program in Alaska.

During each two-year funding cycle, the Monitoring Program funds ongoing projects from the previous cycle (projects may be 1–4 years in duration) as well as new projects. Funding allocation guidelines are established by geographic region (**Table 1**). The regional guidelines were developed using six criteria that included level of risk to species, level of threat to conservation units, amount of subsistence needs not being met, amount of information available to support subsistence management, importance of a species to subsistence harvest, and level of user concerns regarding subsistence harvest. Funding allocation guidelines provide an initial target for planning; however, they are not final and are adjusted annually as needed.

Table 1. Regional allocation guideline for Fisheries Resource Monitoring Program Funds.

Region	U.S. Department of the Interior Funds	U.S. Department of Agriculture Funds
Northern Alaska	17%	0%
Yukon Drainage	29%	0%
Kuskokwim Drainage	29%	0%
Southwest Alaska	15%	0%
Southcentral Alaska	5%	33%
Southeast Alaska	0%	67%
Multi-Regional	5%	0%

The Monitoring Program was first implemented in 2000 with an initial allocation of $5 million. Since 2000, a total of $139.9 million has been allocated for the Monitoring Program to fund a total of 524 projects (**Figure 2** and **Figure 3**).

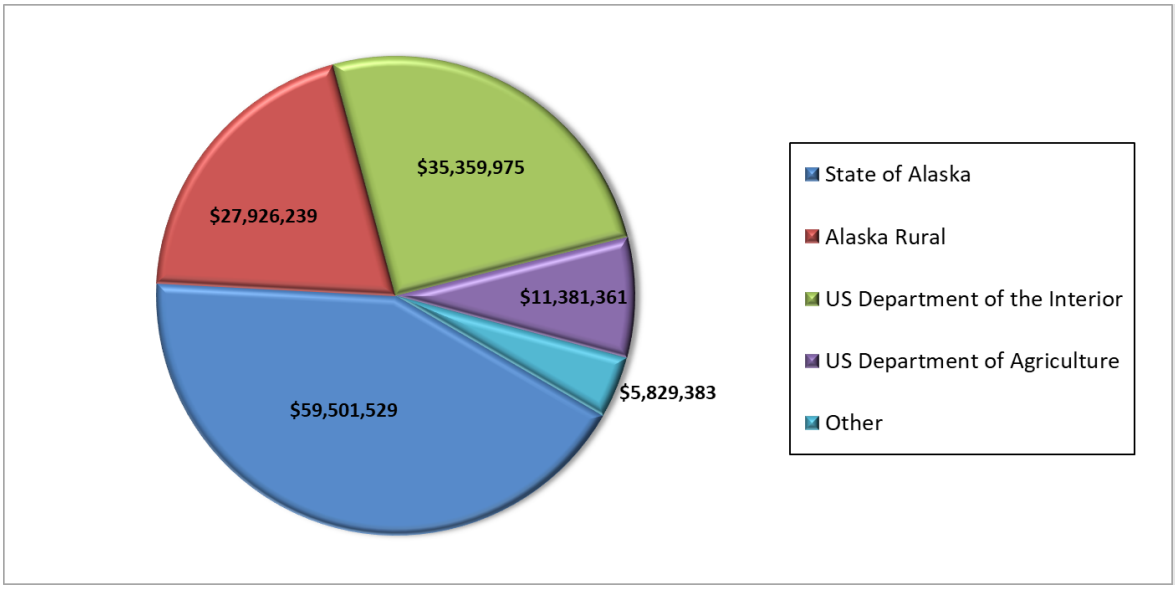


Figure 2. Monitoring Program fund distribution since 2000, identified by primary recipient organization type.

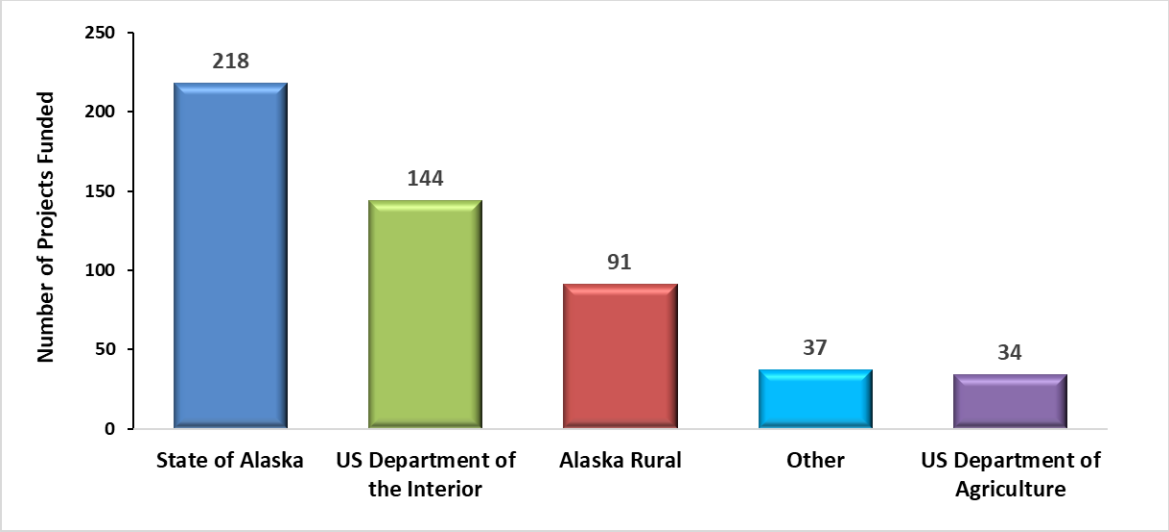


Figure 3. Number of Monitoring Program projects funded since 2000, listed by primary recipient organization type.

The three broad categories of information solicited by the Monitoring Program are (1) harvest monitoring, (2) traditional ecological knowledge, and (3) stock status and trends. Projects that combine these approaches are encouraged.

Harvest monitoring studies provide information on numbers and species of fish harvested, locations of harvests, and gear types used. Methods used to gather information on subsistence harvest patterns may include harvest calendars, mail-in questionnaires, household interviews, subsistence permit reports, and telephone interviews.

Traditional ecological knowledge studies are investigations of local knowledge directed at collecting and analyzing information on a variety of topics such as the sociocultural aspects of subsistence, fish ecology, species identification, local names, life history, taxonomy, seasonal movements, harvests, spawning and rearing areas, population trends, environmental observations, and traditional management systems. Methods used to document traditional ecological knowledge include ethnographic fieldwork, key respondent interviews with local experts, place name mapping, and open-ended surveys.

Stock status and trends studies provide information on abundance and run timing, age-sex-length composition, migration and geographic distribution, survival of juveniles or adults, stock production, genetic stock identification, and mixed stock analyses. Methods used to gather information on stock status and trends include aerial and ground surveys, test fishing, towers, weirs, sonar, video, genetics, mark-recapture, and telemetry.

PROJECT EVALUATION PROCESS

The Monitoring Program prioritizes high quality projects that address critical subsistence and conservation concerns. Projects are selected for funding through an evaluation and review process that is designed to advance projects that are strategically important for the Federal Subsistence Management Program, technically sound, administratively competent, promote partnerships and capacity building, and

are cost effective. Proposed projects are first evaluated by a panel called the Technical Review Committee. The Technical Review Committee's function is to provide evaluation, technical oversight, and strategic direction to the Monitoring Program. This committee is a standing interagency committee of senior technical experts that reviews, evaluates, and makes recommendations about proposed projects that are consistent with the mission of the Monitoring Program. Recommendations from the Technical Review Committee provide the basis for further comments from Subsistence Regional Advisory Councils, the public, the Interagency Staff Committee, and the Federal Subsistence Board, with final approval of the Monitoring Plan by the Director of the Office of Subsistence Management.

To be considered for funding under the Monitoring Program, a proposed project must have a nexus to Federal subsistence fishery management. Proposed projects must have a direct association to a Federal subsistence fishery, and the subsistence fishery or fish stocks in question must occur in or pass-through waters within or adjacent to Federal public lands in Alaska (National Wildlife Refuges, National Forests, National Parks and Preserves, National Conservation Areas, National Wild and Scenic River Systems, National Petroleum Reserves, and National Recreation Areas). A complete project package must be submitted on time and must address the following five specific criteria.

1. ***Strategic Priorities***—Studies should be responsive to information needs identified in the 2026 Priority Information Needs available at the Monitoring Program webpage at https://www.doi.gov/subsistence/frmp/funding. All projects must have a direct linkage to Federal public lands and/or waters to be eligible for funding under the Monitoring Program. Projects should address the following topics to demonstrate links to strategic priorities:

    - Federal jurisdiction—The extent of Federal public waters in or nearby the project area
    - Direct subsistence fisheries management implications
    - Conservation mandate—Threat or risk to conservation of species and populations that support subsistence fisheries
    - Potential impacts on the subsistence priority—Risk that subsistence harvest users' goals will not be met
    - Data gaps—Amount of information available to support subsistence management and how a project answers specific questions related to these gaps
    - Role of the resource—Contribution of a species to a subsistence harvest (number of villages affected, pounds of fish harvested, miles of river) and qualitative significance (cultural value, unique seasonal role)
    - Local concern—Level of user concerns over subsistence harvests (upstream vs. downstream allocation, effects of recreational use, changes in fish abundance and population characteristics)

    To assist in evaluation of submittals for projects previously funded under the Monitoring Program, investigators must summarize project findings in their investigation plans. This summary should clearly and concisely document project performance, key findings, and uses

of collected information for Federal subsistence management. It should also justify the continuation of the project, placing the proposed work in context with the ongoing work being accomplished.

2. ***Technical-Scientific Merit***—Technical quality of the study design must meet accepted standards for information collection, compilation, analysis, and reporting. To demonstrate technical and scientific merit, applicants should describe how projects will:

    - Advance science
    - Answer immediate subsistence management or conservation concerns
    - Have rigorous sampling and/or research designs
    - Have specific, measurable, realistic, clearly stated, and achievable (attainable within the proposed project period) objectives
    - Incorporate traditional knowledge and methods

    Data collection, compilation, analysis, and reporting procedures should be clearly stated. Analytical procedures should be understandable to the non-scientific community.

3. ***Investigator Ability and Resources***—Investigators must show they are capable of successfully completing the proposed project by providing information on the ability (training, education, experience, and letters of support) and resources (technical and administrative) they possess to conduct the work. Investigators that have received funding in the past, via the Monitoring Program or other sources, are evaluated and scored on their past performance, including fulfillment of meeting deliverable and financial accountability deadlines. A record of failure to submit reports or delinquent submittal of reports will be considered when rating investigator ability and resources.

4. ***Partnership and Capacity Building***—Investigators must demonstrate that capacity building has already reached the communication or partnership development stage during proposal development and, ideally, include a strategy to develop capacity building to higher levels, recognizing, however, that in some situations higher level involvement may not be desired or feasible by local organizations.

    Investigators are requested to include a strategy for integrating local capacity development in their study plans or research designs. Investigators should inform communities and regional organizations in the area where work is to be conducted about their project plans. They should also consult and communicate with local communities to ensure that local knowledge is used and concerns are addressed. Investigators and their organizations should demonstrate their ability to maintain effective local relationships and commitment to capacity building. This includes a plan to facilitate and develop partnerships so that investigators, communities, and regional organizations can pursue and achieve the most meaningful level of involvement. Proposals

demonstrating multiple, highly collaborative efforts with rural community members or Alaska Native Organizations are encouraged.

Successful capacity building requires developing trust and dialogue among investigators, local communities, and regional organizations. Investigators need to be flexible in modifying their work plan in response to local knowledge, issues, and concerns, and must also understand that capacity building is a reciprocal process in which all participants share and gain valuable knowledge. The reciprocal nature of the capacity building component(s) should be clearly demonstrated in proposals. Investigators are encouraged to develop the highest level of community and regional collaboration that is practical including joining as co-investigators.

Capacity can be built by increasing the technical capabilities of rural communities and Alaska Native organizations. This can be accomplished via several methods, including increased technical experience for individuals and the acquisition of necessary gear and equipment. Increased technical experience would include all areas of project management including logistics, financial accountability, implementation, and administration. Other examples may include internships or providing opportunities within the project for outreach, modeling, sampling design, or project specific training. Another would be the acquisition of equipment that could be transferred to rural communities and tribal organizations upon the conclusion of the project.

A "meaningful partner" is a partner that is actively engaged in one or more aspects of project design, logistics, implementation, and reporting requirements. Someone who simply agrees with the concept or provides a cursory look at the proposal is not a meaningful partner.

5. ***Cost/Benefit*—**This criterion evaluates the reasonableness (what a prudent person would pay) of the funding requested to provide benefits to the Federal Subsistence Management Program. Benefits could be tangible or intangible. Examples of tangible outcomes include data sets that directly inform management decisions or fill knowledge gaps and opportunities for youth or local resident involvement in monitoring, research, and/or resource management efforts. Examples of possible intangible goals and objectives include enhanced relationships and communications between managers and communities, partnerships and collaborations on critical resource issues, and potential for increased capacity within both communities and agencies.

   Applicants should be aware that the Government shall perform a "best value analysis" and the selection for award shall be made to the applicant whose proposal is most advantageous to the Government. The Office of Subsistence Management strives to maximize program efficiency by encouraging cost sharing, partnerships, and collaboration.

POLICY AND FUNDING GUIDELINES

Several policies have been developed to aid in implementing funding. These policies include:

- Projects of up to four years in duration may be considered

- Proposals requesting Monitoring Program funding that exceeds $235,000 in any one year are not eligible for funding
- Studies must not duplicate existing projects
- Long term projects will be considered on a case-by-case basis

Activities that are not eligible for funding include:

- Habitat protection, mitigation, restoration, and enhancement
- Hatchery propagation, restoration, enhancement, and supplementation
- Contaminant assessment, evaluation, and monitoring
- Projects where the primary or only objective is outreach and education (for example, science camps, technician training, and intern programs), rather than information collection

The rationale behind these policy and funding guidelines is to ensure that existing responsibilities and efforts by government agencies are not duplicated under the Monitoring Program. Land management or regulatory agencies already have direct responsibility, as well as specific programs, to address these activities. However, the Monitoring Program may fund research to determine how these activities affect Federal subsistence fisheries or fishery resources.

The Monitoring Program may fund assessments of key Federal subsistence fishery stocks in decline or that may decline due to climatological, environmental, habitat displacement, or other drivers; however, applicants must show how this knowledge would contribute to Federal subsistence fisheries management. Similarly, the Monitoring Program may legitimately fund projects that assess whether migratory barriers (e.g., falls, beaver dams) significantly affect spawning success or distribution; however, it would be inappropriate to fund projects to build fish passes, remove beaver dams, or otherwise alter or enhance habitat.

2026 NOTICE OF FUNDING OPPORTUNITY

The 2026 Notice of Funding Opportunity focused on priority information needs developed by the Subsistence Regional Advisory Councils with input from subject matter specialists. Investigation plans were due in May 2025. Submitted plans were reviewed and evaluated by the Office of Subsistence Management and U.S. Forest Service staff and were then scored by the Technical Review Committee. Each investigation plan was scored on the following five criteria: strategic priority, technical and scientific merit, investigator ability and resources, partnership and capacity building, and cost/benefit.

2026 FISHERIES RESOURCE MONITORING PLAN

A Fisheries Resource Monitoring Plan is developed during each Monitoring Program cycle that provides an overview of the process, the submitted materials, and the final list of funded projects. The 2026

Fisheries Resource Monitoring Plan will include regional overviews and comments from Regional Advisory Councils and the Interagency Staff Committee. Regional Overviews for each of the seven Monitoring Program regions contain area specific background information as well as the 2026 Technical Review Committee justifications and project executive summaries specific to those regions. The Regional Overviews are distributed for comment through Subsistence Regional Advisory Council meetings, beginning in September 2025. Regional Advisory Council comments are recorded and included in the draft 2026 Fisheries Resource Monitoring Plan that will be forwarded to the Interagency Staff Committee for their comments and finally to the Federal Subsistence Board.

The draft 2026 Fisheries Resource Monitoring Plan will be presented to the Federal Subsistence Board at their February 2026 public meeting. The Board will review the draft plan and forward their comments and recommendations to the Director of the Office of Subsistence Management. Final project selection and funding approval lie with the Director of the Office of Subsistence Management. For this funding cycle, a total of 34 investigation plans were received and considered eligible for funding. Investigators are expected to be notified in writing of the status of their proposals by late spring or early summer 2026.

Winter 2026 Regional Advisory Council Meeting Calendar

Last updated 4/2/2025

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Feb. 15	*Feb. 16* ***PRESIDENTS DAY HOLIDAY*** ***Window Opens***	*Feb. 17* **BBRAC** (Naknek)	*Feb. 18*	*Feb. 19*	*Feb. 20*	*Feb. 21*
Feb. 22	*Feb. 23*	*Feb. 24* **NSRAC** (Point Hope) **WIRAC** (Fairbanks)	*Feb. 25*	*Feb. 26*	*Feb. 27*	*Feb. 28*
Mar. 1	*Mar. 2*	*Mar. 3* **EIRAC** (Fairbanks)	*Mar. 4* **KARAC** (Kodiak)	*Mar. 5*	*Mar. 6*	*Mar. 7*
Mar. 8	*Mar. 9*	*Mar. 10* **SEARAC** (Juneau)	*Mar. 11*	*Mar. 12*	*Mar. 13*	*Mar. 14*
Mar. 15	*Mar. 16*	*Mar. 17* **SCRAC** (Anchorage) **YKDRAC** (Bethel)	*Mar. 18*	*Mar. 19*	*Mar. 20*	*Mar. 21*
Mar. 22	*Mar. 23*	*Mar. 24* **SPRAC** (Nome) **NWARAC** (Kotzebue)	*Mar. 25*	*Mar. 26*	*Mar. 27*	*Mar. 28*
Mar. 29	*Mar. 30*	*Mar. 31* ***Window Closes***	*Apr. 1*	*Apr. 2*	*Apr. 3*	*Apr. 4*

For Immediate Release:
August 13, 2025

Contact: Robbin La Vine
(907) 786-3353 or (800) 478-1456
robbin_lavine@ios.doi.gov

Federal Subsistence Board Concludes July Work Session

ANCHORAGE, Alaska – The Federal Subsistence Board met July 23–24, 2025, to address a range of subsistence management issues, including Council annual reports, charter change requests, and upcoming meeting schedules.

During the session, the Board:

- Approved replies to fiscal year 2024 annual reports from the 10 Regional Advisory Councils
- Reviewed and rejected Council recommendations for charter changes
- Received briefings on the recent Council correspondence
- Confirmed the following 2026 meeting dates:
    - Fisheries Resource Monitoring Program Work Session: Feb. 4–5, 2026
    - Wildlife Regulatory Meeting: Apr. 20–24, 2026
    - Summer Work Session: Aug. 5–6, 2026

The Board also took action on deferred Wildlife Proposal WP24-01, which requests allowing the sale of brown bear hides harvested by federally qualified subsistence users. The proposal was adopted as modified by the Office of Subsistence Management (OSM) in its February 2025 revised conclusion, in deference with the nine Councils that supported the revision. Implementation of the regulation will proceed once the Office of Management and Budget approves creation and use of the new OSM Customary Trade Permit.

In addition to the public work session, the Board held an executive session on July 24 to develop recommendations to the Secretaries of the Interior and Agriculture for Council appointments, review the Sitka Kaagwaantaan Clan's request for extra-territorial jurisdiction in Sitka Sound, and receive updates from the Solicitor and senior DOI leadership. A summary of the executive session will be provided to the Councils and made available to the public upon request.

More information about the Federal Subsistence Management Program is available at www.doi.gov/subsistence or www.facebook.com/subsistencealaska.

To receive email notifications on Federal subsistence issues, send a request to subsistence@ios.doi.gov.

Missing out on the latest federal subsistence issues? If you'd like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing subsistence@ios.doi.gov.-###-

1011 East Tudor Road MS-121 • Anchorage, Alaska 99503-6199 • subsistence@ios.doi.gov • (800) 478-1456 / (907) 786-3888

United States Department of the Interior

NATIONAL PARK SERVICE

Wrangell-St. Elias National Park & Preserve Mile
106.8 Richardson Hwy. P.O. Box 439
Copper Center, AK 99573-0439 907
822 5234 Fax 907 822 3281
http://www.nps.gov/wrst

Wrangell-St. Elias National Park and Preserve Fisheries Report
Fall 2025

Amber Cohen, Cultural Anthropologist
(907) 822-7284 or amber_cohen@nps.gov

SUMMARY OF KEY UPDATES

- Fisheries Biologist Dave Sarafin has retired as of May 30th after 22 years of service at Wrangell-St. Elias National Park and Preserve. He has been missed, and we wish him a happy retirement!
- As of July, the Ahtna Intertribal Resource Commission (AITRC) has taken lead in running the Tanada Creek weir at Batzulnetas. Thank you to Dan Gorze, Tim Olson, and other AITRC staff for managing the weir. Thank you to NPS staff who helped in early June as well.
- The Copper River salmon run had the daily count at Miles Lake sonar surpassing the daily management objective by May 22nd and cumulative count surpassing the cumulative management objective by May 23rd. The run continued strong throughout the season, and harvest opportunities remained open. The Sockeye Salmon sustainable escapement goal has likely been met.
- Miles Lake sonar estimated a season total passage of 895,509 salmon, which is 48% above the management objective of 604,249 salmon (through July 28).
- Assessments by the Alaska Department of Fish and Game (ADF&G) of in-river Chinook Salmon are ongoing. ADFG management actions restricted retention of Chinook Salmon in the State Chitina Personal Use Fishery of the Upper Copper River by mid-season as well as in the sport fisheries of the Upper Copper River drainage.
- As of August 25th, Upper Copper River Federal subsistence fishery permits issued were 250 Chitina Subdistrict, 323 Glennallen Subdistrict, and 3 Batzulnetas permits.
- Historical Federal subsistence harvests in the Upper Copper River through 2024 (as of May 29, 2025) are provided in Tables 1-4.
- Several outstanding harvest reports remain from the 2024 season; 12 reports for the Chitina Subdistrict (94% returned) and 34 reports for the Glennallen Subdistrict (88% returned). Please return your harvest reports, even if you do not fish.
- Federal subsistence fishery in the Lower Copper River: as of August 25th, 146 permits were issued, and total in-season reported harvest was 894 Sockeye Salmon and 21 Chinook Salmon.

Figure 1: Dave Sarafin collecting otoliths from salmon carcasses, 2007

PERSONNEL UPDATES

Fisheries Biologist Dave Sarafin has recently retired from the National Park Service. Dave started his career with seasonal work with the Bureau of Land Management and the U.S. Forest Service before transitioning to the Department of Fish and Game in 1991. He worked in Kodiak until 1999, when he moved to Glennallen. In 2003, he started working as a seasonal fisheries technician at Wrangell-St. Elias, and continued to build his career, culminating in the Copper River Federal Fisheries Management Biologist role in 2016. Dave still lives in Tazlina and continues to serve as a member of the Copper Basin Fish and Game Advisory Committee. Happy trails, Dave!

FISHERIES RESEARCH AND MONITORING PROJECTS

Tanada Creek Salmon Weir

This year, funding through the Fisheries Resource Monitoring Program had been transferred to the Ahtna Intertribal Resource Commission (AITRC) to operate the Tanada Creek salmon weir located at Batzulnetas. Weir installation was completed on June 4. While waiting for the funding to transfer, NPS staff helped monitor the weir, and their hard work is much appreciated. AITRC took over management of the weir in early July.

Inventory of harvestable fish in select waters of Wrangell-St. Elias National Park and Preserve to inform stewardship

Dan Gorze, AITRC fisheries biologist, is the primary investigator for this project which will document the presence, distribution, size, relative abundance, and general habitat conditions of species such as arctic grayling, burbot, Dolly Varden, lake trout, rainbow trout, and whitefish in several lakes across Wrangell-St. Elias National Park and Preserve. At least ten sites have been chosen for inventory. This is in conjunction with the NPS Inventory Program which assists with a detailed implementation plan and facilitates project progress. This project kicked off with a meeting in June 2025. Fieldwork is scheduled for summer 2026 with a report published by spring 2027.

UPPER COPPER RIVER FISHERIES

2025 Copper River Salmon Run Strength and Management Actions

The 2025 Copper River sockeye salmon had a strong run throughout the season, differing from a pattern of a delayed run timing seen in recent years. Federal managers monitored run strength indices throughout the season to evaluate the need for appropriate fisheries management actions. No Federal Special Actions were issued by the in-season manager in the fisheries of the Copper River Drainage. Harvest opportunities continued throughout the season.

Regulatory changes in State management plans for the Copper River District commercial fishery and Chitina personal use fishery took effect in 2025. The commercial fishery was delayed and opened on May 21. The Chitina personal use fishery had been delayed and opened on June 10. It remained closed to the retention of Chinook Salmon for the season. The Copper River District commercial fishery manager often initiated the Expanded Inside Chinook Salmon Closure Area and limited hours for openers out of concern for Chinook salmon as well.

As the run developed, fishing opportunities were expanded during the season. The season total commercial harvest for the Copper River District through August 11 is reported to include 838,637 Sockeye Salmon (a decrease of 561,363 salmon from 2024), and 5,492 Chinook Salmon (a decrease of 3,379 salmon from 2024).

The ADFG sonar at Miles Lake (located just downstream of the Million Dollar Bridge in the Copper River) discontinued operation on July 28. A total of 895,509 salmon were estimated in migration upstream for the season. The season passage estimate is 48% above the July 28 management objective of 604,249 salmon.

2025 Copper River Salmon Passage at Miles Lake Sonar

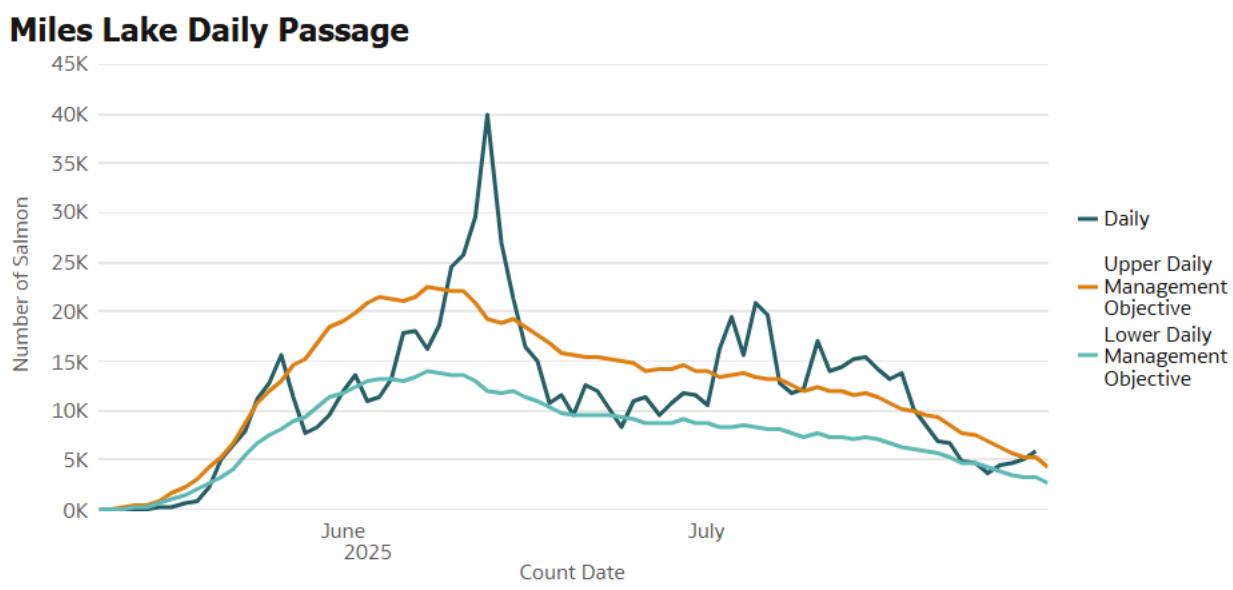


Figure 2: Miles Lake Sonar Daily Passage

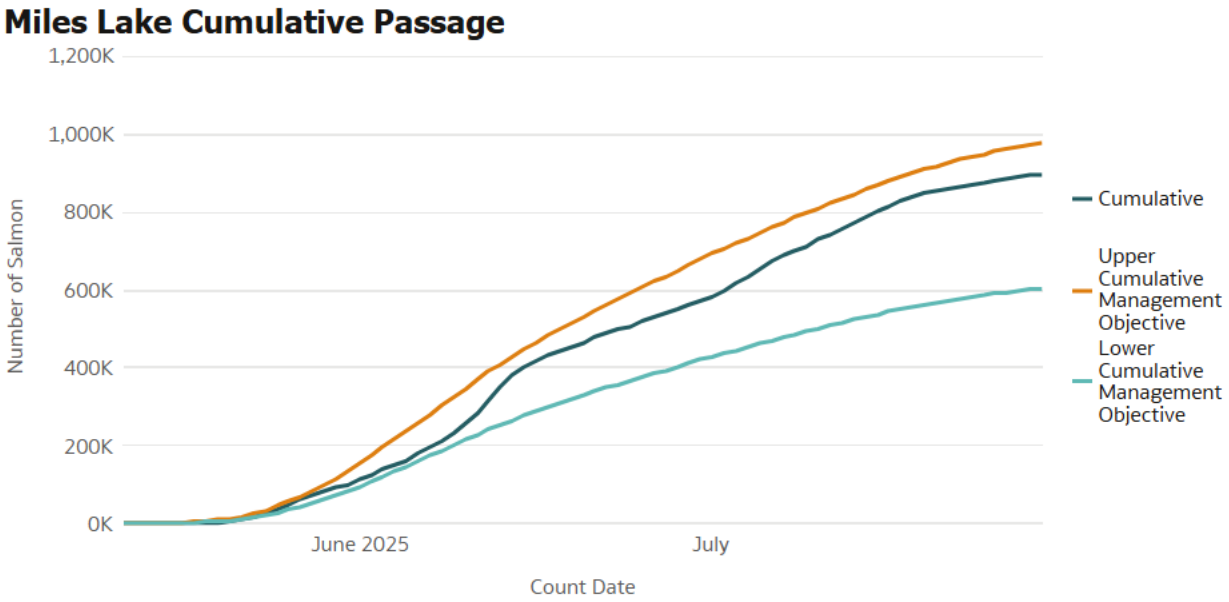


Figure 3: Miles Lake Sonar Cumulative Passage

*Management objectives are based on historical run-timing to achieve the in-river goal.

Source: http://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareacopperriver.salmon_escapement

In line with the pre-season forecast, in-season assessments by ADFG biologists of the numbers of Chinook Salmon in-river raised concern about meeting the sustainable escapement goal for the season. In response to the in-season assessment, the ADFG restricted retention of Chinook Salmon in the Chitina Personal Use Fishery and in the sport fisheries of the Upper Copper River drainage. No closures were made to the State subsistence fishery of the Glennallen Subdistrict.

These restrictions did not affect those fishing under Federal subsistence regulations.

2025 Upper Copper River Federal Subsistence Fishing Season, Permits, and Historical Harvests

The Federal subsistence salmon fisheries of the Upper Copper River are open from May 15 through September 30. Through August 25th, WRST has issued 250 Chitina Subdistrict, 323 Glennallen Subdistrict, and 3 Batzulnetas permits (numbers of permits issued are preliminary until records from remote issuing stations are received). Permits are issued at the Slana Ranger Station, the Visitor Center in Copper Center, Tetlin National Wildlife Refuge Visitor Center in Tok, and at permitting events in McCarthy and Chitina. Figure 4 shows the distribution of permits issued by month—June is the highest month for permits. Tables 2 through 5 show historical reported and expanded harvests for the Federal subsistence fisheries in each subdistrict through the 2024 season as of May 29, 2025.

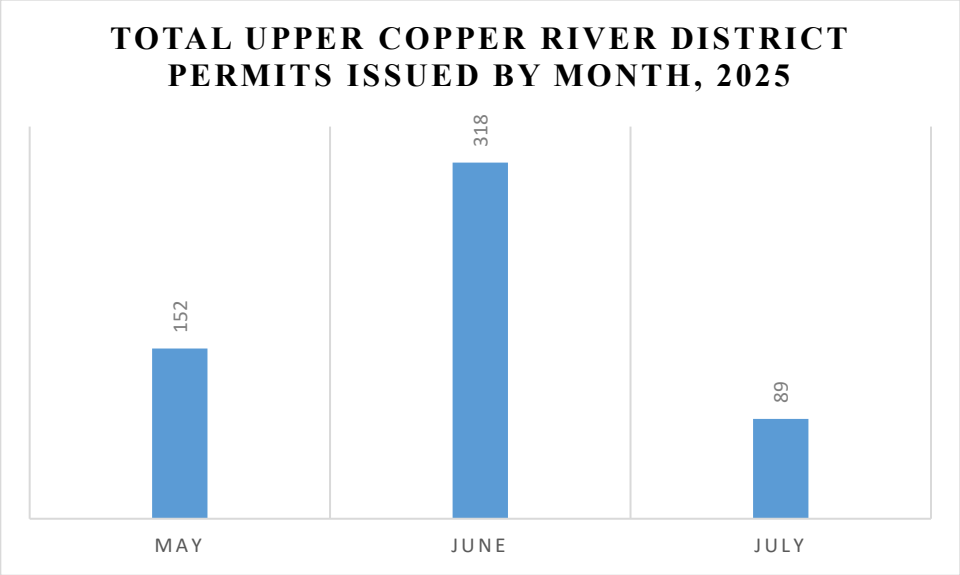


Figure 4: Permit Issuance by Month, 2025

2025 Lower Copper River Federal Subsistence Fishery

The Federal subsistence salmon fishery in the Lower Copper River near Cordova is open from June 1 through September 30. To date, there have been 146 permits issued through the OSM database, an increase from 88 permits issued last year. A total of 894 Sockeye Salmon and 21 Chinook Salmon were reported in harvest through July 28. Table 5 details past permits and harvest data.

Table 1. Federal Subsistence Fish Harvest in All Upper Copper River Fisheries, including Harvest by Gear Type[1]

	Expanded Harvest Estimates[2]						All Species, Approximate Harvest by Gear Type					
Year	Sockeye	Chinook	Coho	Steelhead/ Rainbow Trout	Other Species	Total Harvest	Fish Wheel %	Fish Wheel Total	Dip Net %	Dip Net Total	Rod and Reel %	Rod and Reel Total
2002	10,933	745	20	77	N.A.	11,775						
2003	17,393	687	259	16	N.A.	18,355						
2004	24,217	815	216	15	N.A.	25,264						
2005	24,781	412	55	7	37	25,292						
2006	20,737	507	55	17	37	21,353						
2007	19,108	704	85	7	25	19,929						
2008	14,865	892	268	21	54	16,100						
2009	14,821	590	52	22	36	15,521						
2010	17,156	362	111	46	25	17,700	90.3%	15,978	9.6%	1,697	0.1%	25
2011	18,214	814	70	6	283	19,387	88.4%	17,142	11.4%	2,206	0.2%	39
2012	17,297	410	93	45	113	17,958	90.4%	16,228	9.4%	1,684	0.3%	45
2013	20,850	396	36	8	93	21,382	85.9%	18,369	14.1%	3,013	0.0%	0
2014	25,659	456	97	14	57	26,284	89.3%	23,458	10.8%	2,825	0.0%	3
2015	29,157	430	29	15	218	29,849	90.1%	26,900	9.7%	2,883	0.2%	66
2016	21,106	465	52	6	406	22,035	90.0%	19,820	10.0%	2,197	0.1%	18
2017	20,497	485	10	8	549	21,550	96.2%	20,724	3.7%	804	0.1%	19
2018	20,634	2,763	31	4	45	23,476	83.4%	19,579	16.5%	3,878	0.1%	19
2019	22,302	1,025	22	3	59	23,411	79.0%	18,485	21.0%	4,909	0.1%	16
2020	16,337	837	26	7	60	17,266	75.9%	13,098	24.1%	4,159	0.1%	9
2021	20,481	610	3	6	32	21,132	70.8%	14,951	29.2%	6,175	0.0%	6
2022	17,489	994	45	16	60	18,603	80.2%	14,919	19.8%	3,676	0.0%	7
2023	21,364	823	15	11	19	22,231	70.6%	15,695	29.4%	6,536	0.0%	1
2024	21,504	550	1	0	21	22,076	77.5%	17,109	22.5%	4,967	0.0%	0
5-yr. Avg. 2019-2023	19,595	858	22	8	46	20,529	75.3%	15,430	24.7%	5,091	0.0%	8
10-yr. Avg. 2014-2023	21,503	889	33	9	150	22,584	82.5%	18,763	17.4%	3,804	0.1%	16

[1] This table reflects entries to the online database from 2011 through **5/29/2025**. Data prior to 2011 relies on NPS records. Data for all years subject to changes resulting from entry error corrections.

[2] Expanded Harvest estimate derived from a basic, direct ratio expansion based on the percentage of permits that reported.

Table 2. Glennallen Subdistrict Federal Reported and Expanded Subsistence Fishery Harvests[1]

			Sockeye		Chinook		Coho		Steelhead/Rainbow Trout		Other Species		All Species
Year	Permits Issued	Percentage of Permits Reported	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Total Harvest Estimate[2]
2002	201	80.6	8,009	9,937	564	700	16	20	62	77	35	43	10,777
2003	221	83.3	13,623	16,354	554	665	145	174	13	16	20	24	17,233
2004	261	78.9	17,704	22,439	636	806	152	193	12	15	12	15	23,468
2005	267	85.8	19,973	23,279	331	386	47	55	6	7	32	37	23,763
2006	254	87.4	16,711	19,120	430	492	28	32	15	17	32	37	19,698
2007	281	84.3	15,225	18,060	569	675	34	40	6	7	21	25	18,808
2008	269	81.4	11,347	13,940	705	866	148	182	17	21	44	54	15,063
2009	274	85.0	11,836	13,925	494	581	34	40	19	22	31	36	14,605
2010	269	87.7	12,849	14,651	300	342	64	73	39	44	22	25	15,136
2011	277	87.7	14,163	16,145	701	799	53	60	5	6	248	283	17,293
2012	275	92.0	14,461	15,718	371	403	78	85	40	43	104	113	16,363
2013	273	89.0	15,834	17,789	331	372	24	27	6	7	62	70	18,264
2014	315	90.5	21,603	23,877	399	441	23	25	10	11	52	57	24,412
2015	325	92.3	24,695	26,753	384	416	13	14	7	8	201	218	27,408
2016	320	82.8	15,884	19,181	369	446	9	11	5	6	332	401	20,044
2017	338	85.2	15,691	18,415	399	468	1	1	7	8	468	549	19,442
2018	335	91.3	15,287	16,736	2,432	2,662	0	0	4	4	41	45	19,448
2019	343	90.1	15,873	17,620	849	942	0	0	3	3	53	59	18,624
2020	376	90.7	11,456	12,632	682	752	0	0	6	7	54	60	13,450
2021	355	86.5	13,117	15,168	434	502	0	0	5	6	28	32	15,708
2022	297	83.5	12,133	14,530	743	890	2	2	13	16	48	57	15,495
2023	290	85.2	12,971	15,229	572	672	8	9	9	11	16	19	15,939
2024	293	80.9	14,170	17,518	370	457	0	0	0	0	16	20	17,995
5-yr. Avg. 2019-2023	332	87	13,110	15,036	656	752	2	2	7	8	40	45	15,843
10-yr. Avg. 2014-2023	329	88	15,871	18,014	726	819	6	6	7	8	129	150	18,997

[1] This table reflects entries to the online database from 2011 through **5/29/2025**. Data prior to 2011 relies on NPS records. Data for all years subject to changes resulting from entry error corrections.

[2] Expanded Harvest estimate derived from a basic, direct ratio expansion based on the percentage of permits that reported.

Table 3. Chitina Subdistrict Federal Reported and Expanded Subsistence Fishery Harvests[1]

			Sockeye		Chinook		Coho		Steelhead/Rainbow Trout		Other Species		All Species
Year	Permits Issued	Percentage of Permits Reported	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Total Harvest Estimate[2]
2002	122	73.0	575	788	33	45	0	0	0	0	N.A.	N.A.	833
2003	100	82.0	717	874	18	22	70	85	0	0	N.A.	N.A.	982
2004	109	76.1	1,215	1,597	7	9	18	24	0	0	N.A.	N.A.	1,629
2005	76	84.2	1,265	1,502	22	26	0	0	0	0	0	0	1,529
2006	75	85.3	1,379	1,617	13	15	20	23	0	0	0	0	1,655
2007	98	88.8	929	1,046	26	29	40	45	0	0	0	0	1,120
2008	82	85.4	789	924	22	26	74	87	0	0	0	0	1,036
2009	68	91.2	817	896	8	9	11	12	0	0	0	0	917
2010	92	85.9	2,061	2,399	17	20	33	38	1	1	0	0	2,459
2011	85	85.9	1,766	2,056	13	15	8	9	0	0	0	0	2,081
2012	89	93.3	1,332	1,427	6	6	8	9	1	1	0	0	1,443
2013	99	90.9	1,999	2,199	17	19	8	9	1	1	10	11	2,239
2014	113	94.7	1,549	1,636	14	15	68	72	3	3	0	0	1,726
2015	111	92.8	2,231	2,404	13	14	14	15	7	8	0	0	2,441
2016	128	80.5	1,549	1,925	16	20	33	41	0	0	4	5	1,991
2017	132	79.5	1,454	1,828	12	15	7	9	0	0	0	0	1,852
2018	132	91.7	3,144	3,430	92	100	28	31	0	0	0	0	3,561
2019	181	90.6	4,053	4,473	75	83	20	22	0	0	0	0	4,578
2020	215	89.3	3,249	3,638	76	85	23	26	0	0	0	0	3,749
2021	194	91.8	4,765	5,193	99	108	3	3	0	0	0	0	5,304
2022	177	87.6	2,555	2,918	91	104	37	42	0	0	2	2	3,066
2023	196	86.7	5,138	5,924	131	151	5	6	0	0	0	0	6,081
2024	202	88.6	3,461	3,906	82	93	1	1	0	0	0	0	3,999
5-yr. Avg. 2019-2023	193	89	3,952	4,429	94	106	18	20	0	0	0	0	4,556
10-yr. Avg. 2014-2023	158	89	2,969	3,337	62	69	24	27	1	1	1	1	3,435

[1] This table reflects entries to the online database from 2011 through 5/**29/2025**. Data prior to 2011 relies on NPS records. Data for all years subject to changes resulting from entry error corrections.

[2] Expanded Harvest estimate derived from a basic, direct ratio expansion based on the percentage of permits that reported.

Table 4. Batzulnetas Federal Reported and Expanded Subsistence Fishery Harvests[1]

			Sockeye		Chinook		Other Species	
Year	Permits Issued	Percentage of Permits Reported	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]	Reported Harvest	Harvest Estimate[2]
2001	1	100	62	62	0	0	0	0
2002	1	100.0	208	208	0	0	0	0
2003	1	100.0	164	164	0	0	0	0
2004	1	100.0	182	182	0	0	0	0
2005	1	100.0	0	0	0	0	0	0
2006	0	N.A.	0	0	0	0	0	0
2007	1	100.0	1	1	0	0	0	0
2008	1	100.0	1	1	0	0	0	0
2009	0	N.A.	0	0	0	0	0	0
2010	3	100.0	106	106	0	0	0	0
2011	3	66.7	9	14	0	0	0	0
2012	3	66.7	101	152	0	0	0	0
2013	3	100.0	862	862	5	5	12	12
2014	2	100.0	146	146	0	0	0	0
2015	4	100.0	0	0	0	0	0	0
2016	0	N.A.	0	0	0	0	0	0
2017	1	100.0	254	254	2	2	0	0
2018	1	100.0	468	468	0	0	0	0
2019	1	100.0	209	209	0	0	0	0
2020	1	100.0	67	67	0	0	0	0
2021	1	100.0	120	120	0	0	0	0
2022	2	100.0	41	41	0	0	0	0
2023	2	100.0	211	211	0	0	0	0
2024	2	100.0	80	80	0	0	1	1
5-yr. Avg. 2019-2023	1	100	181	181	0	0	0	0
10-yr. Avg. 2014-2023	2	100	217	217	1	1	1	1

[1] This table reflects entries to the online database from 2011 through **5/29/2025**. Data prior to 2011 relies on NPS records. Data for all years subject to changes resulting from entry error corrections.
[2] Expanded Harvest estimate derived from a basic, direct ratio expansion based on the percentage of permits that reported.

Table 5: Lower Copper River Federal Subsistence Fishery Permits Issued and Harvest by Year

Year	Permits Issued	Sockeye Harvest	Chinook Harvest
2022	69	104	3
2023	71	197	4
2024	88	425	2
2025*	146	894	21

Source: Federal Subsistence Permit Database
*Harvest data as of 8/25/2025

United States Department of the Interior
NATIONAL PARK SERVICE
Wrangell-St. Elias National Park & Preserve
Mile 106.8 Richardson Hwy. P.O. Box 439
Copper Center, AK 99573-0439
907 822 5234 Fax 907 822 3281
http://www.nps.gov/wrst

WRANGELL-ST. ELIAS NATIONAL PARK AND PRESERVE
SUBSISTENCE AND ANTHROPOLOGY REPORT
FALL 2025

Amber Cohen, Cultural Anthropologist, (907) 822-7284 or amber_cohen@nps.gov
Barbara Cellarius, Cultural Anthropologist and Subsistence Coordinator (907) 822-7236 or barbara_cellarius@nps.gov

Federal subsistence hunting permits issued for Wrangell-St. Elias in 2025

Table 1 lists the numbers of caribou, goat, moose, and sheep permits issued by park and Tetlin National Wildlife Refuge staff for federal subsistence hunts on Wrangell-St. Elias lands in Units 11 and 12. Preliminary 2025 numbers will be provided as part of the oral report.

What is next? Updated permit numbers and harvest information will be provided in the Spring 2026 report. Please remember to return your harvest reports, even if you did not hunt!

Dall Sheep Local Knowledge Interviews

Anthropology and wildlife staff at Wrangell-St. Elias conducted a series of local knowledge interviews about Dall sheep with eight long-time hunters and others with a long history of observing sheep in Wrangell-St. Elias. A first draft of the summary report has been written and is undergoing revisions. Funding for this work comes from the NPS Alaska Subsistence Advisory Council and Alaska Geographic.

Outer Coast Ethnographic Landscape Study

Throughout 2025, park staff have been meeting with staff from the Yakutat Tlingit Tribe (YTT) and Native Village of Eyak (NVE) to plan a project that will gather information to complete an Ethnographic Landscape Study. This baseline document will help park management assess coastal resources at risk of being lost due to glacial melt. Starting in 2026, park staff will work with YTT and NVE staff as well as Portland State University professor Doug Deur on coordinating talking circles focused on landscape change. We also anticipate working with Thomas Thornton, University of Alaska Southeast, for additional assistance in the preparation for an Ethnographic Landscape Study.

Table 1. Federal Subsistence Registration Permits in Wrangell-St. Elias NPP, 2015-2025

Unit 11 Goat (FG1101)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
Permits Issued	29	22	26	30	27	27	20	8	6	23	
Individuals Hunting	6	4	3	8	8	4	2	1	2	1	
Animals Harvested	0	0	0	0	1	0	0	0	0	0	
Success Rate (%)	0.0	0.0	0.0	0.0	12.5	0.0	0.0	0.0	0.0	0	

Unit 11 Remainder Moose -- Fall Hunt in part of unit outside of the RM291 hunt area (FM1106)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
Permits Issued	128	138	132	144	107	156	140	139	140	144	
Individuals Hunting	70	75	72	85	45	68	71	66	59	56	
Animals Harvested	13	16	13	12	10	15	11	15	10	13	
Success Rate (%)	18.6	21.3	18.1	14.1	22.2	22.1	15.5	22.7	16.9	23.2	

Unit 11 Moose -- Winter Hunt in southern part of unit (FM1107)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
Permits Issued	17	20	14	11	8	8	7	10	21	13	
Individuals Hunting	3	4	4	2	2	1	2	4	1	8	
Animals Harvested	0	1	0	0	0	1	0	1	1	2	
Success Rate (%)	0.0	25.0	0.0	0.0	0.0	100.0	0	25.0	100.0	25.0	

Unit 11 Elder Sheep (FS1104)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
20Permits Issued	25	32	34	38	34	38	26	25	22	30	
Individuals Hunting	8	12	13	18	14	12	12	10	11	10	
Animals Harvested	3	3	4	1	1	1	3	2	3	4	
Success Rate (%)	37.5	25.0	30.8	5.6	7.1	8.3	25.0	20.0	27.3	40.0	

Unit 11 Elder/Junior Sheep (FS1103)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
Permits Issued	0	1	2	1	0	1	1	2	1	2	
Individuals Hunting	-	1	2	0	-	0	0	0	0	2	
Animals Harvested	-	0	0	-	-	-	-	-	-	0	
Success Rate (%)	-	0.0	0.0	-	-	-	-	-	-	0.0	

Unit 12 Caribou -- Chisana (FC1205) – Closed in 2022 due to conservation concerns

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
Permits Issued	11	8	8	6	4	7	5	n/a	6	8	
Individuals Hunting	7	8	3	3	3	4	1	n/a	5	4	
Animals Harvested	0	1	0	2	1	3	0	n/a	2	2	
Success Rate (%)	0.0	12.5	0.0	66.7	33.3	75.0	0.0	n/a	40.0	50.0	

Table 1. Federal Subsistence Registration Permits in Wrangell-St. Elias NPP, 2015-2025 (cont.)

Unit 12 Elder Sheep (FS1201)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
Permits Issued	7	11	12	14	14	12	13	8	11	9	
Individuals Hunting	3	6	4	8	6	4	6	4	5	1	
Animals Harvested	0	1	1	0	0	1	0	0	0	0	
Success Rate (%)	0.0	16.7	25.0	0.0	0.0	25.0	0.0	0.0	0.0	0.0	

Unit 12 Elder/Junior Sheep (FS1204)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025*
Permits Issued	0	0	0	0	0	0	0	1	1	1	
Individuals Hunting	-	-	-	-	-	-	-	0	0	0	
Animals Harvested	-	-	-	-	-	-	-	-	-	-	
Success Rate (%)	-	-	-	-	-	-	-	-	-	-	

Source: Federal Subsistence Permit Database.
* 2025 data given as part of the oral report.
Note: Success rate is calculated based on the number of individuals hunting, not total permits issued.

Traditional Knowledge, Ethnographic, and Subsistence Projects:

Work is underway on several traditional knowledge, ethnographic and subsistence projects, with most of the work being carried out by project partners through cooperative agreements.

Upper Copper River communities surveyed about subsistence harvests: The Alaska Department of Fish and Game Division of Subsistence, the Ahtna Intertribal Resource Commission (AITRC), and Wrangell-St. Elias National Park and Preserve staff completed comprehensive harvest assessments in Mentasta, Chistochina, Slana, and along the Nabesna Road in 2023-2024. Community data review meetings were held in Mentasta in 2023 and in Chistochina and Slana in 2024. Staff are currently reviewing the technical paper which will be published in December 2025. AITRC and park staff will return to Mentasta, Chistochina, and Slana for follow-up meetings following publication.

Ahtna Ethnographic Overview and Assessment (EOA): This baseline cultural anthropology study includes an annotated inventory of ethnographic and related materials relevant to the Ahtna Athabascans; a narrative synopsis of our current understanding of these materials, with a focus on connections to Wrangell-St. Elias; and a discussion of data gaps and additional research needs. This project was completed through a cooperative agreement with the Ahtna Intertribal Resource Commission. An electronic copy of the report can be downloaded from the park's website (www.nps.gov/WRST) under the tab "Learn About the Park"/ "History and Culture"/ "People"/ "Ahtna and Wrangell-St. Elias: An Ethnographic Overview and Assessment." Printed copies are available by emailing WRST_subsistence@nps.gov with a request for a copy and your mailing address.

Copper River Salmon In-Season Teleconferences: During summer 2025, weekly teleconferences hosted by AITRC with funding from Wrangell-St. Elias provided a venue for Copper River subsistence fishers to share firsthand knowledge about Copper River salmon harvests and returns along with river conditions and other factors that may affect harvests and returns with one another as well as agency staff. Biologists and fisheries managers also shared information on run timing and strength, management strategies, and various Copper River fisheries research and monitoring projects. This multi-year project will continue in summer 2026, and people fishing on the Copper River are encouraged to participate. Information about how to participate along with summaries from the previous calls can be found at the project website: https://www.ahtnatribal.org/teleconferences.

Alternative Harvest Monitoring Methodology: This project aims to develop a new methodology to fill in the gaps between comprehensive community harvest assessments by documenting a series of exploratory subsistence life histories to understand how harvesting and sharing of subsistence resources changes over a lifetime. The ethnographic data on sharing among local, rural people will inform the development of a network analysis methodology. In addition to interviews, a literature review will be compiled of existing social network analysis work in Alaska. The analysis of the interviews, the literature review, and the creation of a methodology framework will be presented in a summary report. This project is in cooperation with AITRC and is looking for participants for interviews.

Report updated 8/27/2025

Ahtna Intertribal Resource Commission (AITRC)

907.822.4466 connect@ahtntribal.org

The Ahtna Intertribal Resource Commission (AITRC) continues in scientific research, seeking funding for future projects and collaborating with other organizations in Game Management Units 11 and 13 projects. Our team's focus extends beyond fish and wildlife. We are working on mapping our customary and traditional use territory, establishing a tribal historic preservation office, and developing apps to help track the distribution of individual subsistence catch. Our primary goal is to fill data gaps to better inform the management of subsistence species that the eight (8) federally recognized tribes and their tribal citizens have relied on since time immemorial to help better co-manage with agencies. The information in this report is current as of August 22, 2025, and may be updated as new data becomes available.

Wildlife-

Mentasta Caribou- AITRC, in partnership with the Cheesh'na Tribal Council, received funding from the U.S. Fish and Wildlife Service (USFWS) through the Tribal Wildlife Grant (TWG) to assist Wrangell–St. Elias National Park and Preserve (WRST) in their ongoing Mentasta Caribou Herd Monitoring. Following the capture and collaring efforts, AITRC transitioned in spring/summer 2025 to research focused on calving and recruitment rates, using capture success and winter survival of collared adult females as benchmarks.

Aerial telemetry surveys of collared Mentasta Caribou to document caribou calf recruitment throughout the 2025 calving season.

AITRC obtained approval through the National Park Service (NPS) Institutional Animal Care and Use Committee (IACUC) and a federal research permit to serve as the lead Principal Investigator for caribou calf capture and collaring. While the original plan called for deploying calf GPS collars, not all permits were approved. In the spirit of adaptability, AITRC pivoted to conducting aerial surveys from late May through mid-July to estimate calving rates and recruitment. These surveys also provided insights into predator activity, with numerous golden eagles and brown bears observed frequenting the core calving areas identified through collared females.

Looking ahead, AITRC intends to pursue calf collaring efforts in 2026 once the necessary authorizations are in place and will submit a grant extension request to ensure this important research is completed. This continued work will strengthen our understanding of Mentasta Caribou dynamics and help inform conservation and management efforts in the years to come.

Trail camera photograph showing two wolves, including one individual fitted with a GPS collar, feeding on the remains of a moose carcass.

Wolf Research- AITRC, in partnership with the Native Village of Tazlina, received funding from the U.S. Fish and Wildlife Service (USFWS) through the Tribal Wildlife Grant (TWG) to study the range, distribution, and seasonal diet of wolf packs within GMU 11. In November 2024, AITRC successfully captured and GPS-collared nine wolves, marking the foundation of this AITRC-led project. The study is supported by an approved Institutional Animal Care and Use Committee (IACUC) protocol through the National Park Service (NPS), along with research permits from NPS, ADFG, and Ahtna Inc.

During the 2024–2025 field season, two AITRC technicians conducted systematic site investigations at clustered GPS locations, recovering biological samples and deploying trail cameras at kill sites, rendezvous areas, and denning locations. These efforts were carried out using

snowmobiles, ATVs, and aircraft, allowing access across diverse terrain. In addition, AITRC partnered with local trappers to collect supplemental biological samples from harvested wolves, expanding dietary analysis across Ahtna's Eastern Territory. In total, 50 wolves were sampled during the 2024–2025 trapping season within and adjacent to the study area, with all samples archived for laboratory analysis.

To further strengthen the research, AITRC is establishing agreements with the University of Alaska Anchorage to conduct stable isotope analysis and with Texas A&M University to complete fecal analysis and parasitology. This work will provide insight into prey composition, seasonal diet shifts, and potential disease prevalence within the population. Funding for this project is secured through December 2025, and following preliminary results, AITRC anticipates pursuing additional funding to build upon findings and expand long-term monitoring.

AITRC works with local hunters to collect samples from harvested Dall sheep, helping investigate diet, health, and disease factors behind population declines.

Dall sheep- In recent years, local hunters across the Ahtna Territory have raised concerns about local Dall sheep populations. In response to these concerns, AITRC has developed a preliminary assessment. This project marks our first step in attempting to understand what might be happening.

AITRC is working with Tribal and local hunters to collect samples from sheep harvested within the Ahtna Territory. We are collecting donated hunter-harvested organs, tissue, hair, fecal, and nasal swabs for elemental analysis, diet analysis, and disease prevalence. These preliminary analyses will gain insight into what sheep eat and how their diet may affect their health, survival, or reproduction.

We hope to learn whether factors—like mineral deficiencies, contaminants, or disease—are part of why sheep numbers seem to be dropping. This information will help guide the next steps and determine whether there are specific areas of concern. By involving our communities now, we're taking steps to ensure Dall sheep remain a healthy and available resource for future generations.

Bear Project- The collaborative project in the Copper Basin is progressing with important milestones recently achieved. A new Data Sharing Agreement (DSA) was signed between AITRC, ADFG, and UAF, providing clear guidelines for how information will be shared and managed, ensuring both tribal sovereignty and scientific integrity. With this agreement in place, Collaboration is beginning to move forward to produce density and abundance estimates for GMU 13.

Trail camera photograph of a female brown bear with two cubs investigating a hair snare site in the Copper Basin. As part of the collaborative project, hair samples collected from these snares are being analyzed to identify individual bears genetically.

This project originated from a tribal elder's simple question: "How many bears are on the land?" To answer this question, the collaborative team is using two complementary scientific approaches. The first is Resource Selection Function (RSF) modeling, which helps identify the types of habitats bears prefer and the area's most important to their life histories. The second is Spatially Explicit Capture-Recapture (SECR) modeling, which uses noninvasive DNA samples from bear hair collected in the field to estimate abundance and density.

Together, these tools should provide the most comprehensive picture to date of landscape-level bear ecology in this part of Alaska.

Fieldwork has already been completed, and DNA analysis of collected hair samples has successfully identified individual bears. This genetic information is now being used to develop both RSF and SECR models. Early results are promising. The next steps include finalizing these models and the covariates, preparing detailed maps and reports, and ensuring results are communicated effectively to both local communities and management agencies.

Ecology-

Disease Surveillance of Copper River Salmon- The Ahtna Intertribal Resource Commission (AITRC) continued its preliminary study to assess disease and parasite burdens in sockeye and Chinook salmon in the Copper Basin. During the 2025 season, 66 sockeye and 17 Chinook samples were collected. Samples include:

- Weight and Length → Overall body condition
- Pelvic fin clipping → Individual genetic stock identification
- Scales and otoliths → Age
- Plasma → Immune proteins for biomarkers of health status
- Whole Blood → Thiamine
- Eggs → fecundity and Thiamine (indicator of reproductive success and fry survival)
- Heart, spleen, kidney → histology and qPCR
- Gastrointestinal tract → parasite burden
- Muscle tissue → stable isotopes and immune proteins

Kelsey Stanbro, Ecologist, and Mia Bobowski and Bella Ranck, Fisheries Technicians, sample sockeye in Chitina

Parts of this project are in collaboration with the ADFG Gene Conservation Lab, the ADFG Pathology Lab, and Sitka Sound Science Center. This project is funded by the Environmental Protection Agency's Indian Environmental General Assistance Program. Wrangell-St. Elias has funded the 2024 and 2025 genetic sampling.

Moose Health Monitoring Project- The Ahtna Intertribal Resource Commission entered year four of the Moose Health Monitoring Program, initiated in response to Tribal Citizens' concerns about meat quality and health risks. With a focus on essential and non-essential elements, the project aims to ensure that subsistence resources are safe for consumption and that the moose population in the Ahtna region is healthy.

Sample Collection: In 2022, we collected 8 samples, followed by 33 samples in 2023, 41 samples in 2024, and 7 samples thus far in 2025. Samples are sourced from hunter harvest, roadkill, educational, or ceremonial take to diversify research opportunities.

Preliminary findings were reported at the spring 2025 meeting. Tamra Jones, an Ahtna tribal citizen, is completing her master's on 'Micronutrient Interactions and Nutritional Status of Moose in the Ahtna Area.' She will be evaluating copper, selenium, molybdenum, zinc, and iron. AITRC will be analyzing the other elements analyzed such as lead, cadmium, etc. The final findings will be published in a thesis and/or peer-reviewed manuscripts, highlighting significant drivers of heavy metal accumulation.

Emily Benson, 2024 Natural Resource Technician, and Tamra Jones, UAF Master's Student, collect a sample from a hunter-harvested moose.

We are grateful for the continued support from Ahtna Inc., the Alaska Department of Fish and Game, the Bureau of Land Management, and Wrangell-St. Elias National Park, all of whom assisted in distributing sampling kits to hunters in the Ahtna region. These projects heavily rely on public participation, and we appreciate the samples that were collected. The project is funded by the Environmental Justice Data Fund.

Fisheries-

Tanada Creek Salmon Weir - The season began with collaborative effort with WRST for installation and repairs, after which, AITRC hired one local, seasonal technician to take on daily weir duties. This season, a goal that was achieved was to improve electronic recording and reviewing technologies to streamline data collection and processing and increase cost efficiency. Plans are in the works for further improvement. After abnormally high water in the beginning to middle of June (only similar to the 2012 floods), and with assistance from the AITRC Fisheries Biologist, the weir has been fully operational, and 2025 salmon passage is currently being estimated. Age (otoliths), sex, and length data will be collected for the Tanada Lake sockeye population in September to continue the run's long-standing age class index.

NPS-WRST Inventory of Freshwater Fish - AITRC will begin an inventory of harvestable freshwater fish in lakes and streams of Wrangell-Saint-Elias National Park beginning in the Spring of 2026.

Water temperature monitoring- As part of the state-wide stream temperature monitoring program, AITRC has remote temperature loggers deployed in major tributaries to the Copper River and various other feeder streams. As ambient summer temperatures greatly affect non-glacial stream temperatures, emphasis was placed on the Gulkana River system. Partnered with USFWS, AITRC collected data from 121 remote sensors in the Middle and West Fork Gulkana. Data was cleaned and uploaded by the Habitat Biologist for upload to the open-source AKTemp. See the section below for further details.

Stream Habitat Restoration-

Community Engagement- A portion of the NOAA grant that funds this position is geared towards engaging with local tribes to help create a prioritization of streams, creeks, lakes, culverts, low water crossings, and areas of anthropogenic disturbance that AITRC and partners can focus restoration efforts on in the future in hopes of protecting and enhancing local fish populations. Thus far, the Gulkana, Gakona, Mentasta, and Kluti-Kaah Village Council meetings, as well as the Ahtna, Inc. annual meeting, have been attended by AITRC's Stream Habitat Restoration Biologist. These engagement opportunities provided a broad foundation to help hone future restoration efforts. Potential projects include culvert replacement work, increased temperature monitoring efforts, beaver management work, and projects to improve stream/trail crossings throughout the Greater Ahtna Territory. Plans are in the works to attend the Chitina, Tazlina, Cheesh'na, and Cantwell Tribal Council meetings in the coming months.

Capacity Building- Another portion of the NOAA grant that funds this position is centered on capacity building. Thus far, the Stream Habitat Restoration Biologist attended a Stream Simulation Design training hosted by the US Forest Service and Trout Unlimited. Plans are in place to attend the Chickaloon Tribal Training in Fish Passage sessions at the end of September/beginning of October.

Copper River Watershed Project (CRWP) - This position focuses on collaborating with our downriver neighbors at CRWP to identify culvert replacement projects and fill in gaps where their work has left off. The AITRC Stream Habitat Restoration Biologist spent a long field day with CRWP staff along the Klutina Lake Trail, surveying failing culverts and low water crossings. The Alaska Department of Transportation (ADOT) was then contacted to determine whether these crossings were a priority for ADOT. It was determined that they are not a priority, but a potential partnership could be established to replace/improve these crossings if prioritized by AITRC/Tribal Leadership. The Alaska Department of Fish and Game (ADF&G) Habitat Permit Coordinator issued the AITRC's Stream Habitat Restoration Biologist an Aquatic Resource Permit to conduct minnow trapping and electrofishing above and below these two crossings. However, no fish were found during the initial site visit. Furthermore, there are plans to meet later this Fall with CRWP staff who will be returning to the Basin to identify further and prioritize road/trail/stream crossing improvement projects.

AITRC Staff Campsite (West fork of the Gulkana)- conducting temperature monitoring.

Temperature Monitoring- AITRCs Stream Habitat Restoration Biologist spent 10 days floating the Middle Fork and the West Fork of the Gulkana River for the stream temperature monitoring efforts underway in partnership with the U.S. Fish and Wildlife Service (USFWS). 121 sites were downloaded and AITRCs Stream Habitat Restoration Biologist undertook all post-processing data management duties and submitted data packets to USFWS promptly upon completion of each float trip. AITRCs Stream Habitat Restoration Biologist also undertook all field collection and data management duties for eight other temperature monitoring locations not affiliated with the USFWS partnership for the 2024/2025 monitoring seasons. All data from both the 2023/2024 and 2024/2025 monitoring periods and updated site locations are now publicly available on Alaska Water Temperature Database (AKTEMP). Ahtna, Inc. was contacted for a research permit to visit potential restoration sites as well as install air temperature monitoring stations in Mentasta, Tanada, and Klutina. This permit was approved by the land committee and plans are in place to deploy sites in the coming weeks.

Anthropology-

Community Household Surveys- This is a multi-year study on how residents of the Mentasta Lake, Mentasta Pass, Chistochina, Slana, and Nebesna Road participate in subsistence. Surveys, data analysis, and community review for all communities have been completed. Currently, the partners are reviewing the draft report, with the intention to publish this report in December 2025.

Exploring Alternative Harvest Monitoring Methodology- Several people participating in the Copper Basin Community Harvest Assessment expressed that a one-year snapshot of a household's participation in subsistence does not capture how harvesting has changed over time. It also became clear that while sharing happens, how resources move through and across communities is unclear. The two primary objectives of this project are to develop a methodology to bridge the gap between comprehensive harvest assessments and harvest monitoring and to delve deeper into methods of studying sharing networks within the Copper Basin.

AITRC's Anthropologist and WRST GS-9 cultural anthropologist are currently setting up a series of exploratory life history interviews to gain insights into subsistence activities, harvest practices, and sharing patterns. In addition to these interviews, the anthropologist will conduct a literature review of existing social network analysis work conducted in Alaska. By combining the results, the project aims to develop a methodology that can fill the data gap between harvest assessments, potentially transforming into a systematic data collection method similar to the comprehensive harvest assessment. The analysis of the interviews and the development of the methodology will be presented in a comprehensive report.

NLURA Staff conducting GPR surveying at Squirrel Creek

Ahtna Cultural Preservation Capacity Building Project- The Ahtna Intertribal Resource Commission (AITRC) is concluding its Tribal Historic Preservation Office (THPO) project to build AITRC's capacity to provide Tribal Historic Preservation Office services to the Native Village of Chitina and, eventually, the other Ahtna Tribes. As part of the project, AITRC has collaborated with the Native Village of Chitina, AKDOT, Ahtna, Inc., Chitina Native Corporation, with Northern Land Use Research Alaska, LLC (NLURA), contracted to conduct archaeological fieldwork on multiple projects in the Chitina area. During the past year, AITRC's THPO has been active in helping the Native Village of Chitina respond to Section 106 requests for feedback on how federally funded projects could impact cultural resources, an important aspect in protecting cultural resources. These include addressing projects being conducted by Copper Valley Telecomm (CVTC), Alyeska, BLM, NPS, and AKDOT. As part of the feedback on these projects, Native Village of Chitina requested AITRC staff to be tribal monitors during fieldwork being done by Alyeska, BLM, and AKDOT. Future monitoring activities are going to be related to AKDOT road work and CVTC's fiber optic project.

Other feedback includes requesting further surveys to identify cultural resources at potential risk from the proposed work. For example, AITRC, Native Village of Chitina, and Ahtna Inc. requested the use of Ground Penetrating Radar (GPR) in a right-of-way where work is being planned in a couple of years. The results indicate that there are ancestors buried within the right-of-way. This discovery, along with the ongoing work to address the protection of graves at O'Brien and Eskilida Creeks, has motivated AITRC to help develop a broader regional protocol to improve how agencies treat the remains of Ahtna Ancestors.

AITRC is planning future cultural management activities that include monitoring AKDOT and CVTC projects. By working closely with our collaborators, AITRC has been making headway in fulfilling the Native Village of Chitina's vision for protecting these important cultural sites.

AITRC & NPS In-Season Salmon Teleconferences- June 5 – August 28, 2025

The Ahtna Intertribal Resource Commission (AITRC) would like to thank Wrangell–St. Elias National Park Service for the support that made it possible to hold a full season of weekly in-season salmon teleconferences. This summer, AITRC hosted twelve teleconferences—slightly more than last year, as the series began earlier in the fishing season. These calls continue to serve as an important space for dialogue, connection, and collaboration among tribal citizens, subsistence users, state and federal managers, and local biologists.

Participation was strong throughout the season. Our first call brought together twenty-four participants, including agency partners and state and federal representatives. The structure of the calls followed a consistent pattern: biologists and managers shared updates on sonar counts, tower numbers, permits issued, and harvest data, followed by reports from subsistence users. This balance allowed for the sharing of both scientific data and lived experiences, ensuring that the information exchanged reflected what was happening on the ground and in the water.

Subsistence users played an especially important role in this year's calls. They provided updates from their camps, reporting on the number of fish harvested, water levels, fish health, and any issues encountered. Their firsthand observations not only informed the discussions but also allowed them to ask questions directly of area biologists and managers. A common theme across many calls was the impact of high-water levels. Several subsistence users reported that they were forced to stop their fish wheels due to low catches, debris, or large trees interfering with their equipment. Others described sporadic fishing conditions, with catches fluctuating depending on water levels.

Not all reports were negative. In the Chitina area and upriver, fishers noted improved catches at certain times, particularly when water levels dropped. The Native Village of Eyak reported that low water created a window of opportunity in which subsistence users were able to access fishing areas and bring in good numbers of fish over the course of a week.
In addition to the weekly teleconferences, AITRC also hosted two in-person meetings. The first was held in Gulkana Village, where youth participation was a highlight, bringing energy and intergenerational perspectives into the conversation. The second, held at Tazlina Hall, served as both the final teleconference of the season and a wrap-up meeting. This gathering provided an opportunity to hear season-end reports from ongoing AITRC projects and to introduce the work of AITRC's Stream Restoration Biologist, who is beginning to look at long-term habitat concerns in the region.
Overall, the 2025 in-season salmon teleconferences successfully combined data sharing, community knowledge, and open dialogue. They provided a vital link between subsistence users and resource managers, strengthening advocacy efforts, documenting seasonal trends, and building collective understanding of the challenges and opportunities facing Copper River salmon.

Tribal Stewardship Coordinator

Research & Training in Tribal Stewardship – Ongoing research focuses on documenting past and present land use by tribal members, requiring skills in GIS mapping, interviews with community members, and detailed study of regional land and water use. Enrollment in the Tribal Governance and Tribal Stewardship Occupational Endorsement Certification (O.E.C.) supports this work by building knowledge of the roles and responsibilities of the eight federally recognized tribes in the Ahtna Region. This program emphasizes understanding tribal concerns related to land, interviewing members and extended families, and applying traditional stewardship principles and laws. Research also explores key issues that conflict with tribal stewardship values and seeks strategies to mitigate these challenges, ensuring future management decisions reflect both cultural priorities and sustainable practices.

Education and Outreach-

AITRC organized a range of hands-on workshops and training designed to strengthen community connections to subsistence resources and ensure knowledge is carried forward.

The Salmon Smoking and Canning Workshop, funded by the National Park Service, blended traditional preservation practices with modern food safety techniques. Participants not only learned the cultural importance of smoking and canning salmon but also how to prepare harvests safely for long-term storage. These skills ensure that families can continue to rely on salmon for food security and cultural well-being.

The Trapping Course offered participants a chance to practice the fundamentals of trap setting, safety protocols, and state regulations. Instructors emphasized responsible harvest practices and respect for the animals. This training supported continued use of furbearer resources in a safe, ethical, and legal manner, while also helping younger generations see trapping as both a cultural tradition and a viable part of community subsistence.

AITRC also created specialized training opportunities for Ahtna Interns and Youth Conservation Corps (YCC) members. These sessions focused on practical field skills such as wildlife observation, fisheries monitoring, and biological sample collection. By equipping youth with these skills, AITRC is building pathways for future leaders in natural resource management—ensuring that the stewardship of salmon, moose, and other subsistence resources remains rooted in both cultural knowledge and modern science.

The YCC and Ahtna interns learn the ins and outs of owning and maintaining a fishwheel from tribal citizen Wayne Bell.

Another highlight was the Biota of Alaska Workshop, which introduced participants to salmon anatomy and AITRC's salmon health project. Youth participants traced the salmon life cycle from egg to adult, examined anatomy firsthand, and learned how salmon shape the entire ecosystem. By connecting classroom learning to real-world subsistence importance, students gained a deeper understanding of why salmon are not only a cultural keystone but also a foundation of food security for Ahtna people and the wider Copper River region. Attendees received one college credit through Prince William Sound College, making this workshop both a cultural and academic achievement.

AITRC also expanded its work with local schools to inspire the next generation of stewards. In partnership with Glennallen Middle School, AITRC co-hosted Salmon in the Classroom, giving students the opportunity to watch salmon develop from eggs to fry. This hands-on experience gave youth a close look at the salmon life cycle, reinforcing why these fish are vital to community subsistence and the ecosystem.

AITRC staff also led fish dissections, where students explored internal and external biology, habitat needs, and conservation challenges. These lessons sparked curiosity while making clear connections between healthy lands and waters and the strength of subsistence resources. At every step, students were encouraged to consider future careers in conservation, biology, and natural resource management—careers that not only serve the land but also support their own communities.

By engaging youth in these programs, AITRC is ensuring that traditional knowledge, cultural values, and modern science come together to protect the subsistence resources that sustain the Ahtna people today and for generations to come.

Wrangell-St. Elias Subsistence Resource Commission
September 25-26, 2025, Tok, AK
Bureau of Land Management Glennallen Field Office

Caroline Ketron, Anthropologist/Subsistence Coordinator

I. General

- Staffing updates: Jacob Masterfield is our acting Field Manager, and Neil Perry is our Assistant Field Manager for resources.
- Bureau of Land Management (BLM) continues to work collaboratively with Alaska Department of Fish and Game (ADF&G) to monitor subsistence resource populations on BLM and State lands within Game Management Unit 13 (GMU 13).
- The BLM Glennallen Field Office submitted Wildlife Proposal WP26-27 this cycle. The proposal requests additional flexibility for our delegated authority for in-season management of the federal subsistence caribou hunt in Unit 13 (when the herd recovers enough to support hunting). The FC1302 hunt is now listed as a May Be Announced hunt by regulation.
- The BLM Glennallen Field Office (BLM-GFO) continues to work with Ahtna Intertribal Resource Commission (AITRC)'s Community Harvest System [updates provided at meeting].

II. Subsistence Permitting

- The BLM Glennallen Field Office issued Federal moose and designated hunter permits for GMU13 from the Glennallen Field Office, and for 3 days in Delta Junction.
- Thank you to the OSM staff that helped us issue permits this year.
- Hunters must get permits in person, demonstrate Alaska and rural residency, and have a current Alaska resident hunting license. The BLM-GFO issues the most Federal subsistence permits of any Federal agency in Alaska (typically 65%, but down to 24% with the caribou hunt closed). We issued slightly fewer U13 moose permits than normal, with the caribou hunt closed: hunters targeting caribou would typically get a moose permit for Unit 13 also, just in case. We still serve about 1,000 federal subsistence hunters and their families and communities.

III. Wildlife Updates

[We do not yet have an official update on the caribou and moose populations from the Alaska Department of Fish and Game but recent ADF&G caribou surveys indicate better calf recruitment resulting in a slight upswing in population overall]

- FSB action on WSA 24-06 closed Federal public lands to State moose hunters in Unit 13B for the 2024 and 2025 seasons. Preliminary moose permit numbers, harvest, and success rates for 2025 will be shared at the meeting.

FEDERAL SUBSISTENCE MOOSE HARVEST GMU 13

Table 1. FM1301 harvest for the 2024 moose season in GMU13

Time Frame	Permits Issued	Permits Attempted	Bulls Harvested	Hunter Success Rate
2025				
5 Year Average*	**1,103**	**475**	**53**	**11.1**

*2020-2024

Subunit: Moose harvest 2025

13A:

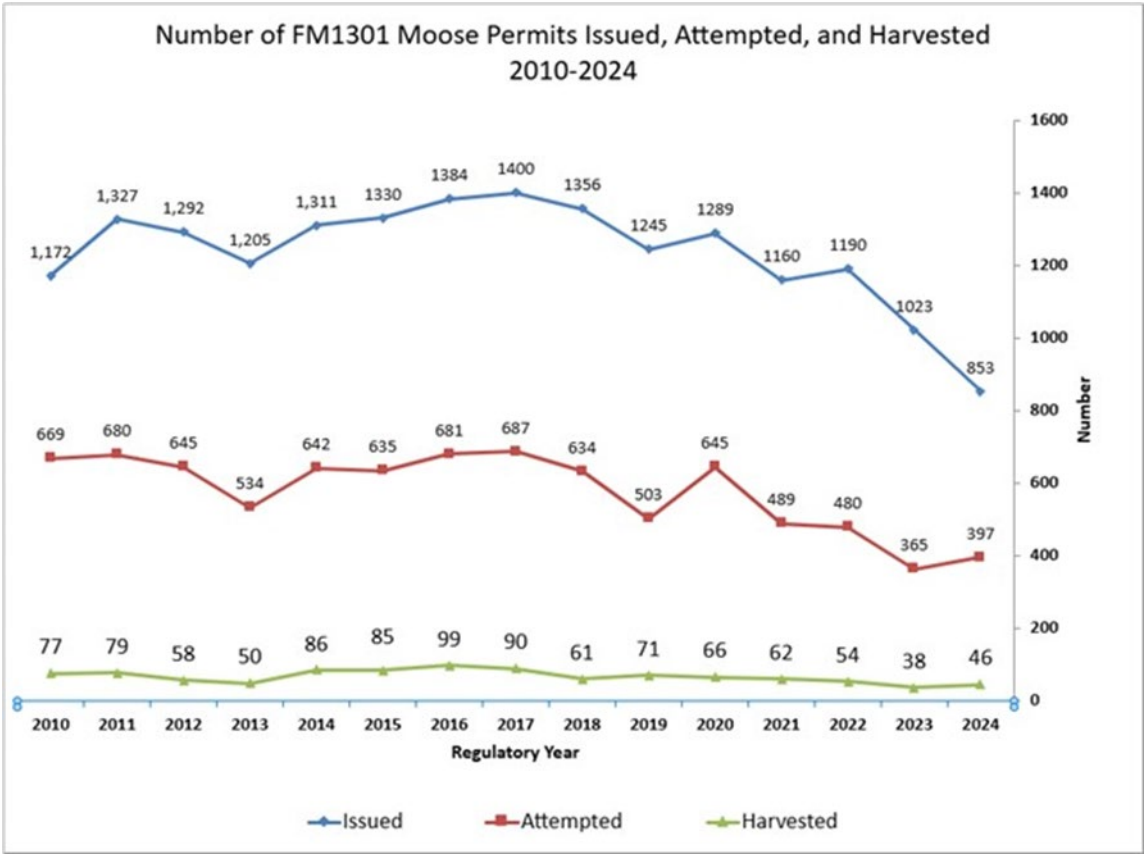
13B:

13C:

13D:

13E:

Figure 1. Federal Subsistence Moose Harvest Pattern (FM1301) from 2010 to 2024



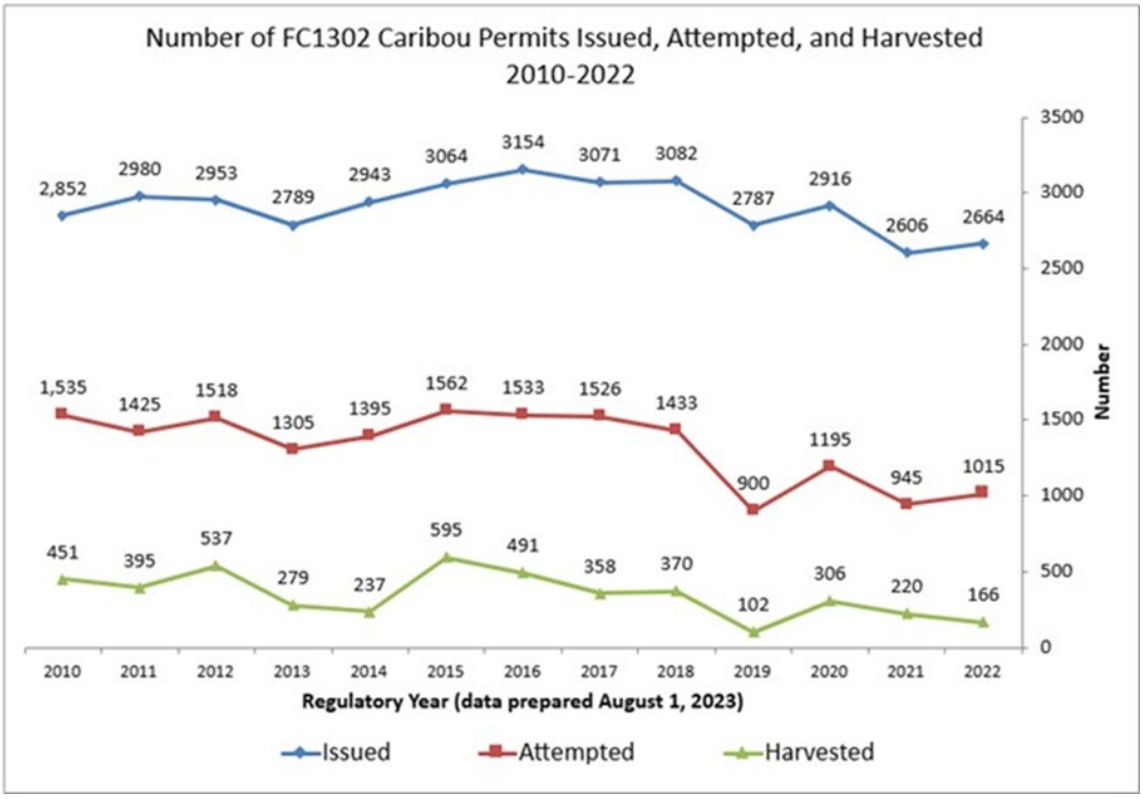
FEDERAL SUBSISTENCE CARIBOU HARVEST GMU 13

Table 2. FC1302 caribou harvest in GMU13. Closed.

	Permits Issued	Permits Attempted	Bulls Harvested	Cows Harvested	Total Harvest	Success Rate
2022/23	2,676	1,015	115	51	166	16.4%
5 Year Average*	2,813	1,097	154	78	233	20.5%

*2018-2022

Figure 2. Federal Subsistence Caribou Harvest Pattern (FC1302) from 2010 to 2022



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, NW
Washington, DC 20240

Susan L. Entsminger, Chair
Wrangell-St. Elias National Park
Subsistence Resource Commission
P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

Dear Chair Entsminger and Commission Members:

Thank you for your March 18, 2025, letter to Secretary Burgum, introducing him to the important work of the Wrangell-St. Elias National Park Subsistence Resource Commission (Commission), highlighting past accomplishments of the Commission, and current research and management priorities related to subsistence.

I wanted to acknowledge receipt of your letter and confirm that it was shared with staff in the Secretary's Office. As more staff are hired in the Department, we look forward to having them learn more about critical subsistence issues in Alaska, and the key role that subsistence resource commissions play in making recommendations to the Secretary of the Interior and the National Park Service related to fish and wildlife issues.

Again, thank you for taking the time to reach out to the Secretary, and share some background on important subsistence issues in Alaska.

Sincerely,

ALMA RIPPS Digitally signed by ALMA RIPPS Date: 2025.04.02 15:44:01 -04'00'

Alma Ripps
Chief, Office of Policy