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

Spring 2025

Wrangell-St. Elias National Park and Preserve
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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.

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[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 1/29/2025)

February 25-26, 2025

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

Teleconference information:
- Toll free number: (866) 541-9494
- Participant Code: 7848787#

- Please mute your phone 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.
- 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 (Coordinator)

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

4) Housekeeping announcements (Coordinator)

5) Review and adoption of agenda* (Chair)

6) Review and approval of minutes from October 4-5, 2024, meeting* (Chair)

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

8) Commission membership status (Coordinator)

9) Election of officers*
   a) Chair (Coordinator)
   b) Vice Chair (Chair)

10) SRC Chair and Members' reports
   a. SRC member reports
   b. Chair's report
      - SRC Chairs Workshop report

11) Superintendent's report (Superintendent)

12) Public Comments (available each morning)

Action Items:

13) Old business action items
   a. ANILCA Section 804 user prioritization analysis* (Cohen)
      - Introduction
      - Report from working group
      - Opportunity for public input
      - SRC discussion and recommendation

14) New business action items
   a. Nabesna Mine cleanup subsistence concerns* (Pister)
   b. Timely wildlife updates
      - Wrangell-St. Elias (Pister)
      - Bureau of Land Management (Ketron)
      - Alaska Department of Fish and Game (Hatcher)
   c. Call for proposals to change federal subsistence wildlife regulations* (Coordinator)
      - Introduction
      - Opportunity for public input
      - SRC discussion of potential proposal submission
   d. Call for proposals to Alaska Boards of Fisheries and Game*
      - Board of Game includes Units 5 and 6 and statewide
      - Board of Fisheries includes Yukon and Statewide

e. Tolsona Resident Zone Request* (time certain: 1 PM on 2/25)
   - Introduction (Cohen)
   - Presentation of the analysis (Cohen/Patterson)
   - Opportunity for public input
   - SRC discussion and recommendation

15) Set tentative date and location for next SRC meeting* (Coordinator)

Reports:

16) Reports related to old and new business
   a. Report on recent Federal Subsistence Board actions (Cellarius)
   b. Report on Alaska Board of Fisheries actions at Prince William Sound and Southeast/Yakutat Meetings (Sarafin)
   c. Report on Alaska Board of Game actions at Central and Southwest Region Meeting (Cohen)
   d. Update regarding caribou working group (Pister)
   e. Update on subsistence timber harvest policy and use of small bridges for subsistence access (Cellarius)

17) 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 (Pister)
   d. Fisheries report (Sarafin)
   e. Subsistence/anthropology report (Cohen)
   f. Interpretation and Education report (Hernandez)

18) 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

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

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

21) Adjourn meeting* (Chair)

DATE: February 25-26, 2025

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

LOCATION: Wrangell-St. Elias National Park and Preserve Visitor Center Complex, Mile 106.8 Richardson Highway, Copper Center, AK and by teleconference. If an in-person meeting is not feasible or advisable, the meeting will be held solely by teleconference.

FOR FURTHER INFORMATION: Barbara Cellarius, Subsistence Coordinator, Wrangell-St. Elias National Park and Preserve, P.O. Box 439, Copper Center, Alaska 99573. Phone (907) 822-7236. 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
Certified for accuracy by SRC Chair Sue Entsminger

WRANGELL-ST. ELIAS SUBSISTENCE RESOURCE COMMISSION

October 4 and 5, 2024
Wrangell-St. Elias National Park and Preserve Visitor Center
Copper Center, Alaska, and by teleconference

1) **Call to order:** Sue Entsminger, the SRC chair, called the meeting to order at 9:03 a.m.

2) **SRC roll call and confirmation of quorum:** Present were Sue Entsminger, Dan Stevens, Suzanne McCarthy, Mercedes Starr Knighten, Nathan Brown, Bruce Ervin, and Kaleb Rowland. A quorum of members was present.

3) **Introduction of Commission members, staff, and guests:**
SRC members: Sue Entsminger, Suzanne McCarthy, Dan Stevens, Mercedes Starr Knighten, Nathan Brown, Bruce Ervin, and Kaleb Rowland. Absent: Daryl James, Clint Marshall, and Edward GreyBear.

NPS staff:
AKRO: Sarah Creachbaum, Scott Gende, Kim Jochum, and Sahara Iverson
WRST: Ben Bobowski, Joshua Scott, Benjamin Pister, Dave Sarafin, Kyle Cutting, Mark Miller, Barbara Cellarius, Amber Cohen, Jan Maslen, Rebekah Levine, Kyle Meakins, Kelly Glascott, and Chelsea Hernandez

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

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

Other organizations: Amanda Jackson (Copper River Watershed Project)

Members of the public: Bruce Gordon (Chitina), Matt Warnick (Tolsona), Kirk Wilson (Tolsona), Carlos Perez Vargas (Tolsona), Estrella Vargas (Tolsona), Brit Peek (Tolsona),

Victoria Rego (Nabesna Road), Michasel Rego (Nabesna Road), and Faye Ewan (Copper Center)

4) **Housekeeping announcements:** Barbara Cellarius gave the purpose of the meeting and detailed instructions for participating in the teleconference and in-person meeting. She explained the process for public comments. She reminded the Commission members about Robert's Rules of Order. Alaska Geographic provided the funds for coffee and refreshments.

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

6) **Review and approval of minutes from March 14-15, 2024 meeting:** Nathan Brown made a motion to adopt the minutes as written, which was seconded by Kaleb Rowland**.** The minutes were approved by unanimous consent.

7) **Superintendent's welcome and review of the Commission purpose**: Superintendent Ben Bobowski gave a welcome to the Commission members, park staff, regional office staff, and members of the public. He reviewed the Commission purpose and thanked the Commission for their time.

8) **Commission membership status:**

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	11/04/2024

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

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

a) **SRC member reports:**

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

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

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

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

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

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

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

b) **Chair's Report**: SRC Chair Sue Entsminger reported that she sat in on a caribou working group meeting and learned that the Nelchina caribou population numbers were up to 12,000 at the latest count. She wondered why there was such a big difference from the previous count, which was 7,000. She said Fish and Game needed to be more accurate. She reported that the summer had been wet, and while it did not bring up the river levels, it did affect the blueberries. During the moose season, people did not see any movement until late in the season. There were two light frosts but not a hard killing frost until the middle of September. A few moose had been harvested. She received a moose tongue from a young woman in Mentasta who got her first moose, and as per tradition, gave most of it away. She did a lot of glassing and saw a few more lambs in the sheep population. During bear season, she had a wolf come into her yard. As a registered guide, she had taken several huge boars over bait and believed that helps the area. She received a report that people are seeing more golden eagles and those take lambs, which is a concern. She did not get any salmon and heard the run was not as big as in the past.

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

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

October 4:

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

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

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

Dan Stevens said Bruce could talk with him.

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

October 5:
Michael Rego of Nabesna Road brought up the ORV management plan and the lack of enforcement by the National Park Service. He saw, due to a lack of caribou hunting, an increase in moose hunting traffic. The Kendesnii Campground was full, and every pull out was full. He saw overweight side-by-sides on the trails for subsistence users. Few local subsistence users harvested a moose. He went out after the season to call them and had not seen any moose. He said it was due to more pressure by state users coming into the preserve. The Park Service also used a Can-Am 6x6 for trail maintenance and administrative use. He was also concerned about trapping on Park Service maintained trails. His neighbor's dog and his own dog were both caught in traps less than a mile from their cabins. He also had an issue with a wolf left in a trap for the season. He wanted to ask for a complete shut down on maintained trails that are heavily used by non-trappers, like the first couple miles of Trail Creek. He said some people were trapping on Nabesna Road, because they did not recognize it as a residential area. He also asked about how to reasonably move house logs out under the recommendations of the Subsistence Resource Commission working group. He said he would like to see a change in methods and means by using something larger over frozen ground cover to harvest wood for house logs. Finally, he had concerns about the sheep numbers in the preserve in Unit 12 and said the non-subsistence hunt was when they had the biggest influx of people into the Nabesna area. He recommended a draw hunt or a limited registration hunt to allow the sheep population to grow.

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

Action Items:

12) Old Business Action Items

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

i) **Introduction**: Barbara Cellarius introduced the compendium, which the park typically releases in mid-January for a 30-day public comment period. The comments inform the proposed changes for the upcoming year. The compendium entry the working group tackled was a revision to the park subsistence log harvest policy,

which dated back to 1989. Kaleb Rowland had raised the issue of authorizing the use of small bridges for subsistence access, which involved timber harvest. The working group's purpose was to do research and develop recommendations on the topic. Working group members were Kaleb Rowland, Suzanne McCarthy, Dan Stevens, Sue Entsminger, and now retired SRC member Gloria Stickwan. The group met three times and developed recommendations.

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

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

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

resource, and notify the park Superintendent immediately. Harvest using thinning techniques, no clearcutting. Harvest is prohibited within 200 feet of private property not owned by the harvester.
    - Standing Live Timber: The same recommendations plus the addition of, harvest of standing live timber is prohibited from slopes steeper than 30 percent (i.e., 30-foot change in elevation over a 100-foot horizontal distance).
- Transportation:
    - Dead or Downed Trees: No permanent roads or trails may be intentionally constructed. Minor brushing of snowmachine trails is not considered to be road or trail construction and is allowed. Skidding of whole logs is limited by ground conditions and season to protect resource values and is generally limited to frozen ground with a minimum of 6-12" of snow cover. Log skidding operations will cease if ground disturbance occurs. During periods when the ground is not frozen and snow covered, harvest logs must be transported in a way that does not involve serious ground disturbance.
    - Standing Live Timber: Same recommendations with the addition of, for permits, Superintendent will designate access routes to be used for harvesting and skidding subsistence logs. Subsistence logs may not be harvested further than one-half mile from a designated access route.
- Other Conditions:
    - Dead or Downed Timber: Use of portable motorized chainsaws (no more than 10 horsepower) is authorized to harvest logs for subsistence purposes; all spills of oil, petroleum products, and hazardous substances associated the use of motorized equipment to harvest or transport the logs must be reported to the Superintendent as well as to the Alaska Department of Environmental Conservation (ADEC) in accordance with Alaska law; immediate actions will be taken to confine the spill to the smallest possible area; and all garbage, equipment and personal property must be removed from the harvest area upon completion of harvest for the season.
    - Standing Live Timber: same recommendations.

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

iii) Opportunity for public input:

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

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

iv) SRC discussion and recommendation:

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

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

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

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

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

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

b) The use of small bridges for subsistence access

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

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

iii) SRC discussion and recommendation:

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

The recommendation to authorize the harvest of up to five live standing trees greater than three inches in diameter at ground height, along with an unlimited number of standing dead or down trees without the need for an individual permit. Additional materials not requiring a permit, such as live trees less than three inches in diameter at ground height, may also be harvested and used as part of the bridge construction, for example, the decking and cross pieces. These bridges are not considered installations, structures or facilities, and thus are not subject to the permit requirements of 36 CFR 1.6 and 36 CFR 5.7 if they're temporary, as defined in 36 CFR 13.1, not to exceed 12 months, not the 30-day limit for temporary facilities in 13.166, and provide access for subsistence uses.

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

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

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

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

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

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

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

ii) **Report from the working group on resident zone boundaries:** Sue Entsminger introduced the report of the working group. The working group members were Clint Marshall, Dan Stevens, Sue Entsminger, Suzanne McCarthy, and Karen Linnell from the Ahtna Intertribal Resource Commission. Some members were not able to attend the first two meetings, but all members attended the meeting on September 24. Although not unanimous, the working group recommended the following:

- Southern boundary of Tonsina: use the Little Tonsina River, which crosses the Richardson Highway at Mile 65.
- Northern boundary of Gakona/Gakona Junction: use Mile 138.2 of the Richardson Highway, which is where Popular Grove Creek crosses the highway.
- Western boundary of Glennallen: use 500 meters west of the west side of Tolsona Creek, which crosses the Glenn Highway at Mile 173.

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

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

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

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

iv) **SRC discussion and recommendation:** Kaleb Rowland made a motion to support the working group's recommendation with the stipulation that it was put in the compendium and not moved into federal regulation to allow for review in the future. Nathan Brown seconded the motion.

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

13) New business actions

a) December 2024 SRC Chairs Workshop

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

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

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

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

i) **Timely updates to inform proposal comments:** No updates were shared.

ii) **FP25-03a: Tolsona C&T for salmon in the Chitina subdistrict:**

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

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

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

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

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

- **SRC discussion and recommendation:** Kaleb Rowland made a motion to support proposal FP25-03a. Suzanne McCarthy seconded the motion. Dan Stevens said the Chickaloon people came from the Chitina area, and that many were his first cousins. Kaleb Rowland said the written public comment stated that people who should use resources should date back to when the park was made. Barbara Cellarius said there was confusion between the resident zone request and the C&T request. Suzanne McCarthy said a lot of them dip net instead of using fish wheels, so this proposal would allow them to dip net in the traditional place in Chitina.

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

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

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

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

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

The SRC took no action on the proposal.

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

- **Introduction:** Barbara Cellarius summarized the OSM staff analysis for WP25-01, which was an out-of-cycle special wildlife request submitted by the Office of Subsistence Management. If adopted, the Nelchina caribou hunts in Units 11, 12, and 13 remainder would be changed to may-be-announced seasons under delegated authorities, and the residents of the communities identified under the ANILCA 804 user prioritization analysis would be able to hunt. The preliminary conclusion by OSM was to support with modification.
- The suggested modified regulation would read:
  (a) For federal public lands in Unit 11 north of the Sanford River, the eligible communities would be Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, and Slana/Nabesna Road.
  (b) For Unit 11 remainder, the eligible communities would be Chitina, Copper Center/Silver Springs, Kenny Lake/Willow Creek, Gakona, Glennallen, Gulkana, McCarthy Road, Tazlina, and Tonsina.
  (c) For Unit 12 remainder, the eligible communities would be residents of the Al-Can border, Dot Lake, Mentasta Pass, Northway, Tanacross, Tetlin, and Tok.
  (d) For Unit 13A, the eligible communities would be Chickaloon, Chitina, Copper Center/Silver Springs, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona.
  (e) For Unit 13B, the eligible communities would be Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina.
  (f) For Unit 13C, the eligible communities would be Chistochina, Gakona, Glennallen, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona.
  (g) For Unit 13D, the eligible communities would be Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina.
  (h) For Unit 13E, the eligible communities would be Cantwell, Chase, Denali Village, and some areas along the park's highway.

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

- **Opportunity for public input:** Copper Center resident Faye Ewan said there should be a study of the past 50 years of management to understand how the

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

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

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

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

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

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

  Nathan Brown made a motion to create a working group to review the list of communities in the Nelchina caribou ANILCA 804 user prioritization analysis. Bruce Ervin seconded. The working group members are Bruce Ervin, Dan Stevens, Mercedes Knighten, and Nathan Brown. The motion passed by unanimous consent.

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

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

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

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

  Bruce Ervin asked whether the early commercial fishery catch caused a late salmon run. Mark Miller said it was a potential explanation. Kaleb Rowland asked what the proposal was. Mark Miller said if the cumulative sonar count did not reach the management objective of the season after two commercial openings,

there would not be a third opening. Sue Entsminger asked whether the commercial fishery occurs during or before the sonar passage. Mark Sommerville said the commercial fishery started around May 15 and the sonar is not in until May 20th or 21st. The objective of the manager is to manage along the pre-season expected curve of the sonar passage. Sue Entsminger asked how that had worked. Mark Sommerville said in the past five years, it had been behind the curve, but if one went back ten years, the sonar passage was ahead of the sonar expected.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

v) **Proposal 54: Restrict use of Copper River District inside closure area during statistical weeks 20 and 21:** Mercedes Knighten made a motion to support Proposal 54, which Nathan Brown seconded.
   - **Public comment:** None.

   - **SRC discussion and recommendation**: Mercedes Knighten said this should not be happening and that they were overfishing. The motion failed by voice vote, one in support and five in opposition.

vi) **Proposal 70: Extend the lower boundary of the Chitina Subdistrict:** Fisheries Biologist Dave Sarafin explained that the proposal would extend the lower boundary of the Chitina Subdistrict. Mercedes Knighten made the motion to support Proposal 70, which Bruce Ervin seconded.
   - **Public comment:** AITRC Executive Director Karen Linnell said the proposal would open the Chitina personal use fishery into another district (Lower Copper River fishery) and she opposed the proposal. AITRC Regulatory Specialist Deanna Kosbruk said that the disturbance of motors in that area where the fish rest will affect the salmon.

   - **SRC discussion and recommendation**: Mercedes Knighten said she would vote against it because she did not want to open up the two nearby creeks to the disturbances. That was where the fish rest before they go into the canyon. There are also trespass issues in that area. The motion failed by a voice vote of none in support and six opposed.

vii) **Proposal 89: Increase the bag and possession limit for burbot in Lake Louise:** Mercedes Knighten made a motion to support Proposal 89, which Nathan Brown seconded.
   - **Public comment**: None.

   - **SRC discussion and recommendation:** Mercedes Knighten said she lived near the area and used Lake Louise for fishing. The population of burbot had increased. Burbot was a good resource for the people. She would support getting more burbot to families. The motion passed by unanimous consent.

viii) **Proposal 90: Modify bag and possession limits of burbot in Crosswind Lake**: Mercedes Knighten made a motion to support Proposal 90, which Bruce Ervin seconded.
   - **Public comment:** None.

   - **SRC discussion and recommendation**: Mercedes Knighten said there had not been any issues with lake trout. There was another lake that was used for fishing for burbot. It was unlikely people were catching a lot of lake trout when getting

burbot. She was going to vote against the proposal due to reducing the harvest limit for burbot. The motion failed unanimously by voice vote.

d) Review and comment on proposals to the Alaska Board of Game

i) **Timely updates to inform proposal comments:** No updates were given.

ii) **Proposal 59: Lengthen wolf trapping season in Unit 11:**

- **Introduction:** Barbara Cellarius introduced the proposal, which was submitted by the SRC and would lengthen the wolf trapping season in Unit 11 from November 10-March 31 to October 15-April 30. This would align the Unit 11 season with the season dates in Units 12 and would provide additional opportunity to harvest wolves.

- **Opportunity for public comment:** AITRC consultant Jim Simon supported the proposal and said the use of wolves was customary and traditional and would increase subsistence activity.

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

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

- **Introduction:** Barbara introduced the proposal, which was submitted by the SRC and would lengthen the coyote trapping season in Unit 11 from November 10-March 31 to October 15-April 30. This would align the trapping season with the one in Unit 12 and provide additional opportunity to harvest coyotes.

- **Opportunity for public comment:** None.

- **SRC discussion and recommendation:** Nathan Brown made a motion to support Proposal 60, and it was seconded by Kaleb Rowland. Mercedes Knighten said it would allow for the customary and traditional practices to take place if the season was extended and could increase the knowledge base about trapping. The motion passed by unanimous consent.

iv) **Others:**

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

- **Public comment:** AITRC Executive Director Karen Linnell said they were opposed to any special hunts for bow hunters who have other opportunities and do not need their own season. Nabesna Road resident Michael Rego

agreed with Karen and said he was concerned about the length of the season and opening another season when harvest was down for moose and sheep.

- **SRC discussion and recommendation:** Kaleb Rowland spoke against the proposal, saying that the season they want to open from July 21 to 31 is in the middle of summer. It would be difficult to keep meat in a backpack and not have it spoil. The season is not viable from a meat care standpoint. Bow hunters have a month to hunt, and they can go where there are not rifle hunters. The motion failed unanimously.

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

- **Public comment:** AITRC Executive Director Karen Linnell said AITRC submitted this proposal to close state hunts for the Nelchina caribou herd. Last fall, there were less than 8,000 individuals in the herd, and they are still waiting for public census counts for this year. There is an expected twelve to fifteen years for herd recovery, and that is over a generation of folks who will be unable to hunt the herd. They included other units due to the Nelchina herd movement, and that the Talkeetna herd was an extension of the Nelchina herd. Two permits had been given away by the Governor for that herd. If actions were not taken to close the hunt, rather than by emergency order, then it will take the herd longer to recover. Salcha resident Jim Simon commented that he supported the proposal, and he noted that there is not a waterbody in the area where the Nelchina caribou are that does not have an ATV trail on it. He was concerned about their habitat. He also referred to his previous comments on the ANILCA section 804 user prioritization analysis.

- **SRC discussion and recommendation:** Mercedes Knighten said it was disappointing that other user groups had access to the Nelchina caribou when subsistence users could not hunt them. It was difficult to know what hunts they could apply to or how to get into another hunt. She supported the proposal to have more regulations on those non-local users. The motion passed by unanimous consent.

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

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

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

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

communities. One gap in the coverage by projects is Alaska Highway communities between Tanacross and Northway.

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

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

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

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

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

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

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

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

15) Reports related to old and new business

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

b) **Report on recent Federal Subsistence Board actions:** Barbara Cellarius provided updates on recent Federal Subsistence Board actions. Kim Jochum from the Alaska Regional Office said the Office of Subsistence Management was looking into how to get a federal permit for the sale of brown bear hides, which is related to the deferral of WP24-01. It will be brought to the Regional Advisory Councils during their winter cycle and so will take longer for a decision.

c) **Update regarding caribou working group:** Benjamin Pister reported that the working group met on Thursday, but since biologists had been out in the field, they will plan to meet again in the winter.

d) **Overview of previous discussions of a durational residency requirement for subsistence eligibility:** Barbara Cellarius gave an overview of the topic, which had come up during the previous SRC meeting. At a December 1996 SRC meeting, the SRC commented that an individual should be required to live in the resident zone for one year before becoming eligible for subsistence uses in the national park, and they prepared a draft hunting plan recommendation to establish a minimum residency requirement. In October 2003, the regional director wrote letters rejecting the hunting plan recommendation based on a legal review by the solicitor's office, which concluded a durational residency requirement would be inconsistent with Congressional intent. One does need to make Alaska their primary permanent residence for a year before they can be qualified to harvest fish or wildlife under federal subsistence regulations.

e) **Resident zone community request from Tolsona:** Cultural Anthropologist Amber Cohen presented the report on the Tolsona Community Corporation request for the addition of Tolsona to the resident zone. Park staff were preparing a written analysis regarding the long-term customary and traditional pattern of subsistence uses by Tolsona residents. A public hearing will be held on October 22 in Tolsona to take comments on Tolsona's request.
    a. **Public Comment:** No public comments were received.

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

a) **NPS Alaska Region Subsistence Program Report:** Subsistence Analyst Kim Jochum gave the report which included a new staff member in the Alaska Native and Tribal Affairs Program. The regional office hosted five university-level Alaska Native Engineering and Science Program interns who worked in park units throughout the state. The Regional Director sent a letter to the Director of the National Park Service to request

financial compensation for SRC members. This was in conjunction with the Office of Subsistence Management requesting financial compensation for the Regional Advisory Council members. There was also an open funding call for subsistence research project proposals.

b) Resource Stewardship and Science Report: Team Lead for Resource Stewardship and Science Benjamin Pister gave a short report that focused on staffing changes.

c) Wildlife Report: Wildlife Biologist Kyle Cutting gave the report. Wrangell-St. Elias has two caribou herds, the Mentasta herd and the Chisana herd, and they counted a low number of Mentasta caribou. The Chisana herd had calf-cow and bull-cow ratios that were above management objective for allowing a small hunt. They recently deployed 25 GPS collars, 10 on the Mentasta herd and 15 on the Chisana herd. He received funding for a project to look at historic data about herd overlap for the Mentasta, Chisana, and Nelchina caribou herds. They recently completed a large moose survey across 2 million acres from McCarthy to the Nabesna River where they recorded record low numbers of adult moose and saw very low calf production. They conducted sheep surveys in the northern Wrangell Mountains, the Mentasta Mountains, and the Nutzotin Mountains. Results will be shared in the spring. He received funding for a project to repeat sheep surveys that were done in 2011, to expand in the Chugach, the St. Elias, and Wrangell Ranges to see if they all declined in the same rate. Barbara Cellarius reported that an updated Chisana Caribou Herd Management Plan is about ready to be signed.

d) Fisheries Report: Dave Sarafin gave an update to the report he provided earlier. He mentioned that the park received funding from the NPS Inventory and Monitoring Program to look into harvestable freshwater fish species. They will work with AITRC on this project.

e) Copper River Salmon Fisheries Research Report: Mark Miller reported on numerous ongoing salmon fisheries research projects. The first project, in collaboration with ADF&G, involved collecting tissue samples from salmon harvested in the commercial fishery and the upriver fisheries for genetic analysis to understand stock composition of harvest. Two other projects look at environmental changes that affect in-river mortality. A fourth project is the harvest assessments of Upper Copper River communities. The final project, funded by the Inflation Reduction Act, will create a working group with collaborators from the Prince William Sound Science Center and the University of Alaska-Fairbanks to look at potential consequences of climate change on the status of Copper River sockeye salmon and their management.

f) Subsistence/Anthropology Report: Cultural Anthropologist Amber Cohen reported that the park had issued an estimated 227 federal subsistence permits for hunts of caribou, goat, moose, and sheep. The park is assisting with the harvest assessments of communities in the Upper Copper River and had a data review meeting in Slana coming up. Since 2019, the park had been working with AITRC on an Ahtna Ethnographic Overview and Assessment, which is coming out later in the winter. The partner on the project on quantifying changing environmental conditions to inform decisions about means of winter access is working on an outreach product for the general public. Amber,

Kyle and Barbara interviewed eight local knowledge holders about Dall sheep in Wrangell-St. Elias. The anthropology team is going to begin work on an Outer Coast Ethnographic Landscape Study.

g) **Interpretation and Education Report:** Acting Team Lead for Interpretation and Education and Public Affairs Officer Chelsea Hernandez reported that park had 50,000 visitors in 2024. Their staff educated the public about the park and about subsistence. They also offered formal programs and had 7,000 people attend throughout the summer. They had 2,500 local contacts in the local communities. The Education program worked closely with the Youth Conservation Corps, and out of seven members, five were kids from the local area and identify as Alaska Native. They worked in the Kennecott area for the summer. They also worked with the Ahtna Youth Interns. Interpretation staff issued about 600 federal subsistence fishing and hunting permits.

17) Reports from Other Organizations and Agencies

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

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

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

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

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

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

c) **Bureau of Land Management:** Caroline Ketron, Cultural Anthropologist/Subsistence Coordinator for BLM-Glennallen Field Office, provided updates on staffing changes. They issued 853 federal moose permits. In previous years, their permit numbers had hit over 1,000 as hunters who target caribou would take a moose tag, too. But with no caribou hunt, hunters were going elsewhere. Harvest reports were still coming in, but the preliminary number was 46 moose harvested, with 1 moose harvested in subunit 13A, 31 moose in subunit 13B, 1 moose in subunit 13C, 9 moose in subunit 13D, and 4 moose in subunit 13E. They went to Delta Junction to issue permits, and participation was lower than usual.

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

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

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

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

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

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

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

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

Wrangell-St. Elias National Park
Subsistence Resource Commission
Roster

As of January 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
Daryl James	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.

WP25–01 Executive Summary	
General Description	Proposal WP25-01 requests changing all Nelchina caribou herd (NCH) hunts in Units 11, 12 remainder, and 13 to may be announced seasons, delegating authority to Federal in-season managers to manage the NCH hunts, and conducting an Alaska National Interest Lands Conservation Act §804 user prioritization analysis for the NCH. *Submitted by: Office of Subsistence Management*
Proposed Regulation	See page 2.
OSM Preliminary Conclusion	**Support** Proposal WP25-01 **with modification** to specify which communities are eligible to hunt caribou via the §804 user prioritization analysis, add WRST and DENA superintendents to the entities consulted in Unit 13 remainder, and rescind DALs, moving existing delegated authority to unit-specific regulations.
OSM Conclusion	**Support as modified** by the Southcentral Alaska and Eastern Interior Alaska Regional Advisory Councils.
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	**Support as modified** by the Eastern Interior Council (including the OSM modifications in the preliminary conclusion and additional modifications to the §804 determination made by the Eastern Interior Council).
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	**Support as modified** by Office of Subsistence Management in the preliminary conclusion, with additional modifications to the §804 determination: add Gakona to Unit 13A, Gulkana to Unit 13C, and Mentasta Lake and Chistochina to Unit 12 remainder.
Interagency Staff Committee Comments	The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.
ADF&G Comments	**Neutral**
Written Public Comments	**None**

STAFF ANALYSIS
WP25-01

ISSUES

Wildlife Proposal WP25-01, submitted by the Office of Subsistence Management, requests changing all Nelchina caribou herd (NCH) hunts in Units 11, 12 remainder, and 13 to may be announced seasons, delegating authority to Federal in-season managers to manage the NCH hunts, and conducting an Alaska National Interest Lands Conservation Act (ANILCA) §804 user prioritization analysis for the NCH.

DISCUSSION

An ANILCA §804 analysis for the NCH was initially requested by the Wrangell-St. Elias National Park Subsistence Resource Commission (WRST SRC) in fall 2023. Office of Subsistence Management determined that this original Special Action Request did not meet the criteria for special actions, because it was not considered time-sensitive for the 2023/24 regulatory year. Subsequently, the WRST SRC and the Bureau of Land Management (BLM) Glennallen Field Office requested a §804 analysis as a component of their Special Action Requests in spring 2024 to close Federal hunts on the NCH in Units 11, 12 remainder and 13 to all users for the 2024/25 regulatory year (WSA24-02 and WSA24-03, respectively). In June 2024, the Federal Subsistence Board (Board) postponed the §804 analysis to the February 2025 fisheries regulatory meeting, where it will be considered as WP25-01 (this analysis). The Board postponed the §804 analysis in order to allow evaluation through the full regulatory process.

The proponent of WP25-01, Office of Subsistence Management (OSM), states that regulatory action outside of the normal wildlife regulatory cycle is warranted due to severe conservation concerns for the NCH, coupled with the importance of caribou to local subsistence users. No harvestable surplus is currently available, but allowing limited harvest for communities most dependent on the herd as soon as biologically sustainable is important for the continuation of subsistence uses. OSM further states that it is imperative that affected Councils and the public be given the opportunity to provide their recommendations and testimony on the analysis. The proponent believes it is also critical that affected Tribes and ANCSA corporations be given additional opportunity for consultation on the §804 analysis. Finally, OSM notes that submitting this proposal as soon as possible as part of the fisheries regulatory cycle allows adequate opportunity for comment, provides more regulatory options and flexibility, and enables more timely regulatory action rather than waiting an additional year for the wildlife regulatory cycle and processing additional special action requests.

Existing Federal Regulation

Unit 11−Caribou

1 bull by Federal registration permit (FC1108)	*May be announced.*

Unit 12−Caribou

Unit 12, remainder—1 bull	*Sep. 1–20.*
Unit 12, remainder—1 caribou may be taken by a Federal registration permit (FC1202) during a winter season to be announced. Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by the Tetlin National Wildlife Refuge Manager in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee	*Winter season to be announced.*

Unit 13−Caribou

Units 13A and 13B—2 caribou by Federal registration permit only (FC1302)	*Aug. 1–Sep. 30* *Oct. 21–Mar. 31*
Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)	*Aug. 1–Sep. 30* *Oct. 21–Mar. 31*

Proposed Federal Regulation

Unit 11−Caribou

1 bull by Federal registration permit (FC1003)	*May be announced.*

Federal public lands are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis) hunting under these regulations.

Unit 12−Caribou

Unit 12, remainder—1 bull *OR*	***May be announced between** Sep. 1–20.*
~~*Unit 12, remainder*~~ *—1 caribou* ~~*may be taken*~~ *by* ~~*a*~~ *Federal registration permit* ~~*during a winter season to be announced*~~*.* ~~*Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by*~~ *The Tetlin National Wildlife Refuge Manager**,** in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, **Office of Subsistence Management,** and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee **may announce season dates, harvest quotas, open/close seasons, and for the winter season, set sex restrictions.*** ***Federal public lands are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis) hunting under these regulations.***	*Winter season* ~~*to*~~ ***may** be announced **between Oct. 1-Apr. 30**.*

Unit 13−Caribou

Units 13A and 13B— up to 2 caribou by Federal registration permit only (FC1302) ***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** Aug. 1–Sep. 30* ***May be announced between** Oct. 21–Mar. 31*

Federal public lands are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis) 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 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 are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis) hunting under these regulations.	

Relevant Federal Regulation

50 CFR 100.17 Determining priorities for subsistence uses among rural Alaska residents.

(a) Whenever it is necessary to restrict the subsistence taking of fish and wildlife on public lands in order to protect the continued viability of such populations, or to continue subsistence uses, the Board shall establish a priority among the rural Alaska residents after considering any recommendation submitted by an appropriate Regional Council.

(b) The priority shall be implemented through appropriate limitations based on the application of the following criteria to each area, community, or individual determined to have customary and traditional use, as necessary:

(1) Customary and direct dependence upon the populations as the mainstay of livelihood;

(2) Local residency; and

(3) The availability of alternative resources.

Existing State Regulation

Unit 11−Caribou

No State season

Unit 12−Caribou

Residents – that portion west of the Glenn Highway (Tok cutoff) and south of the Alaska Highway within the Tok River drainage— 1 bull	*HT*	*Sep. 1—Sep. 20*
Residents – that portion west of the Glenn Highway (Tok cutoff) and south of the Alaska Highway, excluding the Tok River drainage (Macomb Herd)— 1 bull	*RC835*	*Aug 10–Aug 27*
Residents and Nonresidents – Unit 12 remainder		*No open season*

Unit 13−Caribou

Note: ADF&G did not offer registration or subsistence permits during the fall 2023 application period, effectively closing the season without an Emergency Order (EO).

Residents – One caribou by permit per household, available only by application. See Subsistence Permit Hunt Supplement for details	*RC561*	*No open season.*
Residents – One caribou by permit per household, available only by application. See Subsistence Permit Hunt Supplement for details	*RC562*	*No open season.*
Residents – One caribou by permit per household, available only by application. See the Subsistence Permit Hunt Supplement for details	*CC001*	*No open season.*
Nonresidents		*No open season.*

Extent of Federal Public Lands/Waters

Unit 11 is comprised of approximately 87% Federal public lands and consists of 84% National Park Service (NPS) managed lands and 3% U.S. Forest Service (USFS) managed lands (**Figure 1**). Portions of Wrangell-St. Elias National Park and Preserve and Chugach National Forest are located in Unit 11.

Unit 12 is comprised of approximately 60% Federal public lands and consists of 48% NPS managed lands, 11% US Fish and Wildlife Service (USFWS) managed lands, and 1% BLM managed lands (**Figure 1**). Tetlin National Wildlife Refuge and portions of Wrangell-St. Elias National Park and Preserve are located in Unit 12.

Unit 13 is comprised of approximately 13% Federal public lands and consists of 6% NPS managed lands, 5% BLM managed lands, and 2% U.S. Forest Service (USFS) managed lands (**Figure 1**). Portions of Chugach National Forest, Denali National Park and Preserve, and Wrangell-St. Elias National Park and Preserve are located in Unit 13.

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.

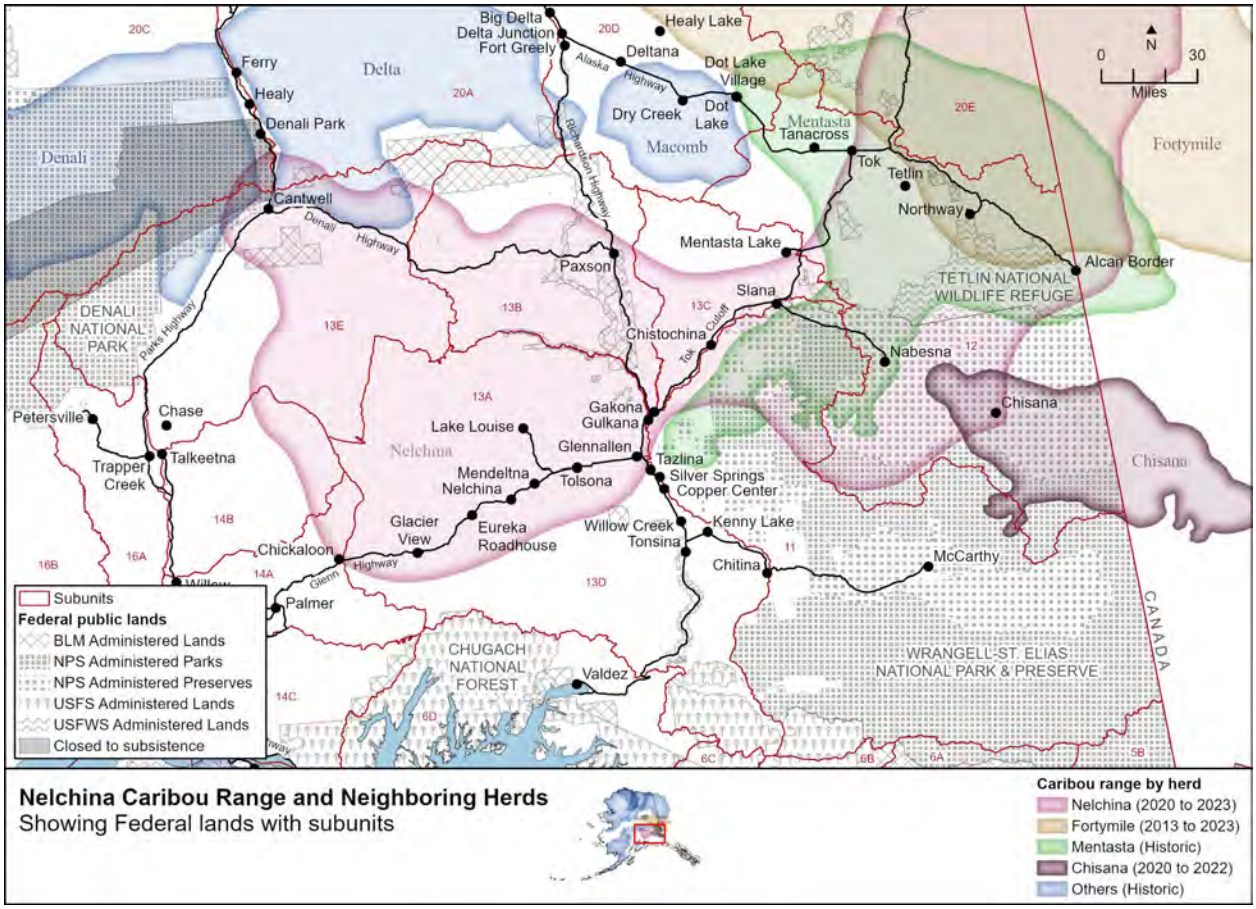

Figure 1. Federal public lands and caribou herd ranges in Units 11, 12, and 13.

Customary and Traditional Use Determinations

Unit 11

Residents of Units 11, 12, 13A–D, Chickaloon, Healy Lake, and Dot Lake have a customary and traditional use determination for caribou in Unit 11, north of the Sanford River.

Residents of Units 11, 13A–D, and Chickaloon have a customary and traditional use determination for caribou in Unit 11, remainder.

Unit 12

Residents of Unit 12, Chistochina, Dot Lake, Healy Lake, and Mentasta Lake have a customary and traditional use determination for caribou in Unit 12.

Unit 13

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.

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.

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.

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

See **Table 1** for information on which communities have a customary and traditional use determination for Units 11, 12, and 13.

Table 1. Communities with a customary and traditional use determination for caribou in Units 11, 12, or 13. Communities are ordered by the unit or area in which they are located. An "X" indicates that the community has a customary and traditional use determination for caribou in the unit or subunit.

	Community	Community Location	13A, 13D	13B	13C	13E	11, N of Sanford River	11, remainder	12
1	**McCarthy**	11	X	X	X	X	X	X	
2	**McCarthy Road**	11	X	X	X	X	X	X	
3	**Mentasta Pass (Tok Cutoff Road, mileposts 79-110)**	12		X	X		X		X
4	**Northway**	12					X		X
5	**Tanacross**	12					X		X
6	**Tetlin**	12					X		X
7	**Tok**	12					X		X
8	**Alcan Border AK**	12					X		X
9	**Glacier View**	13A/D	X	X	X	X	X	X	
10	**Sheep Mountain**	13A/D	X	X	X	X	X	X	
11	**Lake Louise**	13A	X	X	X	X	X	X	
12	**Nelchina**	13A	X	X	X	X	X	X	
13	**Mendeltna**	13A/D	X	X	X	X	X	X	
14	**Tolsona**	13A/D	X	X	X	X	X	X	
15	**Glennallen**	13A/D	X	X	X	X	X	X	
16	**Paxson**	13B	X	X	X	X	X	X	
17	**Gulkana**	13B	X	X	X	X	X	X	
18	**Chistochina**	13C	X	X	X	X	X	X	X
19	**Gakona**	13B/C	X	X	X	X	X	X	
20	**Mentasta Lake**	13C	X	X	X	X	X	X	X
21	**Slana/Na-besna Rd**	13C/11/12	X	X	X	X	X	*	**
22	**Chitina**	13D	X	X	X	X	X	X	
23	**Copper Cen-ter/Silver Springs**	13D	X	X	X	X	X	X	
24	**Kenny Lake/Willow Creek**	13D	X	X	X	X	X	X	
25	**Tazlina**	13D	X	X	X	X	X	X	

	Community	Community Location	13A, 13D	13B	13C	13E	11, N of Sanford River	11, remainder	12
26	**Tonsina**	13D	X	X	X	X	X	X	
27	**Cantwell**	13E	X	X	X	X			
28	**Chase**	13E	X	X	X	X			
29	**Chickaloon**	14A	X	X	X	X	X	X	
30	**Parks High-way MP 216-239*** **	20A/C				X			
31	**McKinley Village (now Denali Park Village)**	20C				X			
32	**Delta Junction**	20D		X					
33	**Dot Lake**	20D		X	X		X		X
34	**Dry Creek**	20D		X					
35	**Healy Lake**	20D		X	X		X		X

*Slana and the portion of Nabesna Road in Unit 11 have C&T; Nabesna and the portion of Nabesna Road in Unit 12 do not have C&T.
**Nabesna and the portion of Nabesna Road in Unit 12 have C&T; Slana and portion of Nabesna Road in Unit 11 do not.
***Excluding the residents of Denali Park Headquarters

National Park Service Resident Zones

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. 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.

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. Cantwell is the only community included in the analysis that is eligible to subsistence hunt in the portion of Denali National Park in Unit 13E.

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 NCH can be found in the OSM analysis of Wildlife Proposal WP24-09 (OSM 2023a).

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 to 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 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 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 Field Office 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 and for moose in Unit 11.

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, including expansion of the community harvest system for moose and caribou in a portion of Unit 12.

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. Although 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 the steep decline of 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 EO when quotas were exceeded. 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.

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 SRC, which requested closure of Federal public lands in Units 11, 12 remainder and 13 to caribou hunting by all users for the 2024/2025 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 Field Office, 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 postpone a decision on the §804 user prioritization analysis to the February 2025 Board fisheries regulatory meeting. This proposal, WP25-01, implements that deferral, ensuring that the §804 analysis will go through the full public process, including consideration by the Regional Advisory Councils. The Board took no action on WSA24-03. The Board stated that conservation concerns warranted a closure to caribou hunting by all users, while its modification provided for cultural continuation and transfer of knowledge through generations.

A §804 user prioritization analysis for the NCH has never been previously conducted by OSM or considered by the Board. However, the Board has considered a §804 analysis for the Mentasta caribou herd in Unit 11 and the Chisana caribou herd in Unit 12. In 1996, the Board adopted P96-17, which

opened a season for the Mentasta caribou herd in Unit 11, determined that up to 15 bulls could be harvested, and implemented a §804 user prioritization for residents of the traditional Ahtna villages of Chitina, Chistochina, Copper Center, Gakona, Gulkana, Mentasta and Tazlina. In 1998 the Board adopted P98-23, closing all Mentasta herd hunts in Unit 11. A may be announced season was established for caribou in Unit 11 in 2022 (WP22-35), but there is no longer a §804 user prioritization in place for caribou in the unit.

In 2012, the Board adopted WP12-66, submitted by the Cheesh'na Tribal Council, which, in addition to requesting a Federal registration hunt for the Chisana Caribou Herd, asked for a §804 analysis to be completed for the herd. Residents of Unit 12, Chistochina, Dot Lake, Mentasta Lake, and Healy Lake have a customary and traditional use determination for caribou in Unit 12. In Unit 12, that portion east of the Nabesna River and Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border (Chisana caribou hunt area), the Board determined that Federal public lands would be closed to the harvest of caribou except by residents of Chisana, Chistochina, Mentasta, Northway, Tetlin, and Tok as recommended by the §804 analysis. The area of Unit 12 in which this user prioritization applied is excluded from the current analysis. In 2016, the user prioritization in this portion of Unit 12 was removed and the hunt was opened to all federally qualified subsistence users but remains closed to non-federally qualified users.

Current Events Involving the Species

Public Hearing on Related Special Action Request

Testimony provided during public hearings for WSA24-02/03 is relevant to the current proposal. As described in the regulatory history, WSA24-02/03 requested closure of Federal public lands in Units 11, 12 remainder and 13 to caribou hunting by all users for the 2024/2025 regulatory year and asked that an ANILCA §804 user prioritization analysis be conducted for the NCH. OSM held a public hearing for WSA24-02/03 on May 1, 2024, by teleconference. Two people testified. The first caller, a year-round resident of the Cantwell area on the Denali Highway, and a federally qualified subsistence user, was in support of a §804 user prioritization, which should give preference to communities without a grocery store. The second caller represented the Alaska chapter of Back Country Hunters and Anglers. The caller recognized rural subsistence challenges and supported exploration of user prioritization in the area.

Tribal Consultation

Tribal consultation on the previous Special Action Request, WSA24-02/03 is relevant to the current proposal. Only information pertaining to the §804 analysis is included here. OSM held both a tribal and an Alaska Native Claims Settlement Act (ANCSA) corporation consultation for WSA24-02/03 on May 10, 2024, by teleconference. During the tribal consultation, a representative with the Ahtna Intertribal Resource Commission described how tribal members harvest caribou from the NCH opportunistically when the animals migrate close to their area. She mentioned how caribou migration has been interrupted due to an increase in vehicle traffic due to an increase in human population.

During the ANCSA corporation consultation held May 10, 2024, one caller from Northway Village testified. He described how village residents hunt caribou and how difficult it can be depending on whether the caribou are on State or Federal public lands. He mentioned how harvest of caribou, which has always been secondary to moose in harvest by locals, is currently less than it used to be, although he did not know why. Moose are very important to residents of Northway Village, with caribou usually taken when people are unable to harvest enough moose. He also voiced concerns over being able to take a caribou for a potlatch ceremony if harvest was still restricted 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 2023, the NCH summer minimum count and fall population estimates ranged from 6,983–53,500 caribou and averaged 36,896 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, 2023e). 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 bear 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 in October 2023 (**Figure 2**), which is the lowest estimate since 2003 (ADF&G 2023a, 2024a). 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 the deep winter 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 2017b). 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 2022b) Preliminary indicators suggest winter conditions during 2023–2024 were milder, which may lead to greater over-winter survival of adult caribou. However, very small surviving calf cohorts from 2021, 2022, and 2023 have the potential to slow population growth and will impact recovery of the NCH (ADF&G 2023d).

Bull:cow and calf:cow ratios have fluctuated greatly over time. Between 2003 and 2023, the fall bull:cow ratio ranged from 23–64 bulls:100 cows and averaged 38 bulls:100 cows, with the second lowest estimate occurring in July 2023 (**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**). Once again, the composition survey conducted in October 2023 resulted in the lowest observed calf:100 cow ratio of 3 calves:100 cow, indicating an anticipated low recruitment for 2024.

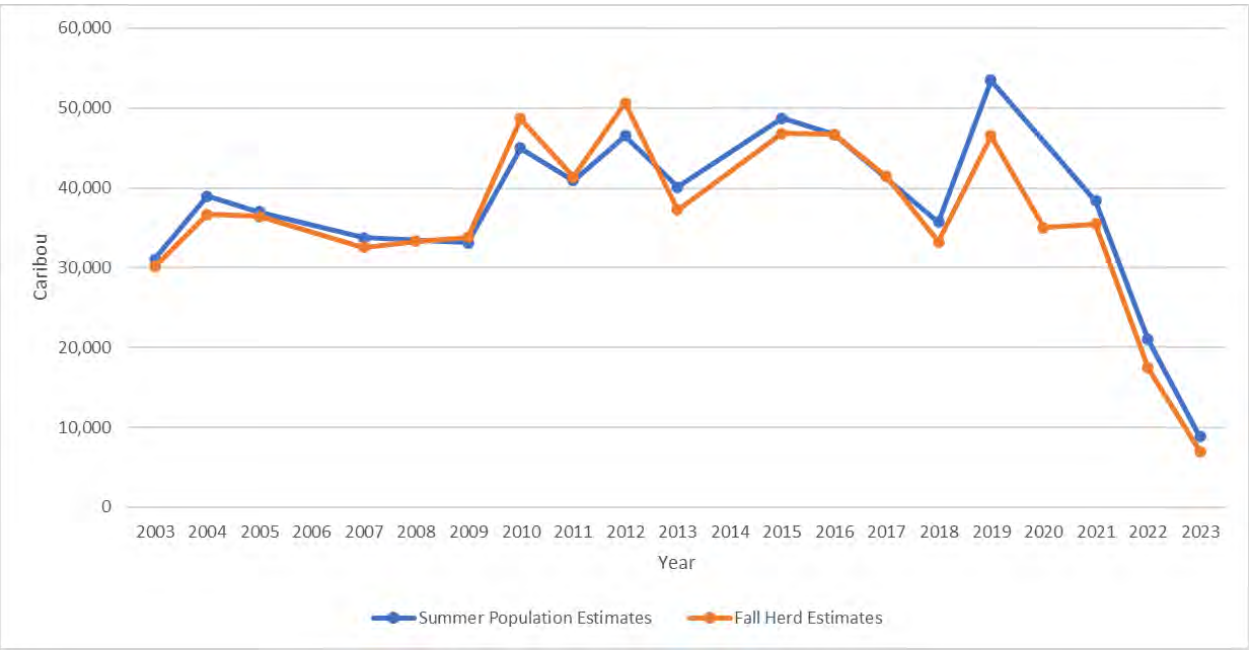

Figure 2. Summer and fall population estimates for the NCH (ADF&G 2024a). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

Table 2. Population estimates and fall composition metrics of the NCH (Tobey and Kelleyhouse 2007; ADF&G 2008, 2010b, 2019a, 2023a, 2023b, 2024a; Schwanke 2011; Schwanke and Robbins 2013; Robbins 2015, pers. comm.; Rinaldi 2019, pers. comm; Hatcher 2021, pers. comm.).

Year	Bulls:100 cows	Calves:100 cows	Summer Estimates	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	40		
2007	34	35	33,744	32,569
2008	39	40		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	35		41,411
2018	40	20	35,703	33,229
2019	32	41	53,500	46,528
2020	28	17		35,000
2021	38	45	38,400	35,500
2022	26	16	21,000	17,433
2023	25[a]	3	8,823	6,983
Average	38	35	37,453	36,340

[a] 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 2023b).

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 is comparable to the long-term average (2001-2022) of 2,762 permits (**Table 4**). The 2022/23 reported Federal harvest of 166 caribou was much lower than the long-term average (2001–2022) of 371 (OSM 2023b). 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 2023b). 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).

In Unit 12, there is no Nelchina caribou harvest opportunity under State regulations. Opportunities for caribou harvest of the Macomb herd do exist in a small portion of Unit 12 by registration permit (RC835). Other opportunities for caribou exist in a small portion west of the Glenn and south of the Alaska Highway by harvest ticket. These caribou are believed to be small satellite herds associated with the Macomb herd (Caikoski 2023, pers. comm.). No harvest of caribou has occurred in Unit 12 remainder under State regulations since 2001, when the may be announced winter season was removed from regulation.

In Unit 12 remainder, Federal permit FC1202 allows for harvest of caribou on Federal public lands during a may be announced winter season. This hunt has been announced annually since 1998, while not being offered only three years since inception (OSM 2023b). In-season management for this hunt has been delegated to the Tetlin National Wildlife Refuge Manager and includes announcing the sex of the caribou that may be taken as well as the season dates. While this hunt sees less participation than the Unit 13 hunt, with a smaller pool of federally qualified subsistence users and no corresponding State hunt, annual harvest averages 28 caribou (**Table 5**). FC1202 also allows for the harvest of cows during the winter and early spring when they may be pregnant. Cow harvest has comprised between 0–100% of FC1202 harvest from 2001–2022, averaging 40% (OSM 2023b). Harvest of pregnant cows would negatively affect the productivity of the herd and hamper recovery, although the in-season manager has the authority to limit harvest to bulls-only.

In Unit 11 no Federal caribou harvest has occurred due to conservation concerns over the Mentasta caribou herd. No caribou hunt exists in State regulations. While a may be announced season and Federal permit (FC1108) were established under Federal regulations in 2022 to provide opportunity if

Nelchina caribou were available, the season has never been announced.

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 2023b).

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	0	0	0	0

[a] Original quota of 4,000 caribou was lifted and no adjusted quota was announced.

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

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	0	0	0	0	0	0
AVERAGE (2001-2022)	2,761	1,326	267	102	4	372

Table 5. The number of permits issued, permits used, sex and total caribou harvested under permit FC1202 Federal caribou hunt in Unit 12 (OSM 2023b).

Regulatory Year	Permits Issued	Hunted	Male	Female	Unknown Sex	Total Harvest
2001	41	18	1	0	0	1
2002	2	2	0	0	0	0
2003	102	44	13	0	0	13
2004	114	49	18	1	0	19
2005	78	39	6	10	0	16
2006	53	30	0	3	0	3
2007	88	34	11	5	2	18
2008	147	66	15	13	0	28
2009	111	49	18	0	2	20
2010	120	75	31	23	0	54
2011	103	61	37	9	3	49
2012	152	100	35	35	1	71
2013	113	68	15	21	4	40
2014	116	59	15	22	0	37
2015	126	75	14	35	0	49
2016	114	47	3	3	0	6
2017	128	36	6	4	0	10
2018	88	43	10	1	0	11
2019	158	96	20	33	1	54
2020	149	79	23	33	0	56
2021	130	61	16	11	1	28
2022	108	62	3	19	0	22
2023	0	0	0	0	0	0
AVERAGE (2001-2022)	106	54	14	13	1	28

ANILCA §804 user prioritization

ANILCA §804 mandates that the taking on Federal public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes. ANILCA §804 further requires that whenever it is necessary to restrict the taking of populations of fish and wildlife on such lands for subsistence uses in order to protect the continued viability of such populations, or to continue subsistence uses, such a priority shall be implemented through appropriate limitations based on the application of three criteria.

The three criteria are: (1) customary and direct dependence upon the populations as the mainstay of livelihood, (2) local residency, and (3) the availability of alternative resources. An analysis based on §804 of ANILCA identifies which residents of communities or areas have a priority for the take of a resource in a particular area.

This proposal asks the Board to identify the subset of federally qualified subsistence users who are most dependent on the NCH. User prioritizations, however, are made on the basis of hunt areas, rather than herds. While 95% of harvest from the NCH occurs in Unit 13 (and the communities in the analysis harvest primarily in Unit 13B), this analysis also considers caribou harvest in Units 11 and 12 remainder, the other two areas in which Federal public lands are closed to caribou harvest through the 2024/2025 regulatory year. The goal of this analysis is to identify those federally qualified subsistence users that exhibit the greatest customary and direct dependence on caribou in the range of the NCH, and who would be eligible to harvest caribou in Unit 13, as well as Units 12 remainder and 11, should a limited hunt open in the future.

Structure of the Analysis

There are four Federal caribou hunt areas contained within Unit 11, 12 remainder, and 13, covering the range of the herd. Unit 13 contains two Federal hunt areas, and Unit 11 and Unit 12 remainder are each single hunt areas. However, some of these hunt areas are further subdivided for the purposes of customary and traditional use determinations, so that there are in total seven separate customary and traditional use determinations in the request area. Because §804 determinations prioritize a subset of federally qualified subsistence users (those with a customary and traditional use determination), the analysis must consider use in each of these seven customary and traditional use areas before applying prioritizations to hunt areas. In order to avoid repetition, criterion 1 (customary and direct dependence) and criterion 3 (the availability of alternative resources) are analyzed only once. However, criterion number 2, local residency, is addressed separately for each hunt area.

Communities Included in the Analysis

Thirty-five communities with a customary and traditional use determination for caribou in Units 11, 12 remainder, and 13 are included in the analysis; in total, these communities have an estimated population of 5,977 residents[1] (**Table 6**). The customary and traditional use determinations for each hunt area determine which communities are considered in the §804 analysis for each area (see **Table 1**). Most communities have a customary and traditional use determination for caribou in more than one area within the current NCH closure area (**Table 1**). Although the customary and traditional use determinations for caribou in the range of the NCH in many cases include residents of entire units (e.g., all residents of Unit 11 have a customary and traditional use determination for Units 13A and 13D), the §804 analysis considers only individual communities because data on use of caribou is available on a community basis.

[1] Because there are no population estimates available for some communities and areas, the actual total population for all communities and areas considered in the analysis is slightly higher.

Table 6. All communities considered in the §804 analysis for at least one area, with the unit in which the community is located and estimated population (ADLWD 2022).

	Community	Unit in Which Community is Located	Estimated Population (2022)
1	**Tok**	12	1,342
2	**Delta Junction**	20D	983
3	**Glennallen**	13A/D	427
4	**Copper Center/Silver Springs**	13D	316
5	**Kenny Lake/Willow Creek**	13D	294
6	**Tazlina**	13D	257
7	**Glacier View**	13A/D	251
8	**Chickaloon**	14A	246
9	**Northway**	12	223
10	**Cantwell**	13E	196
11		13B/C	181
12	**Denali Park Village**	20C	*
13	**Tanacross**	12	141
14	**Tetlin**	12	140
	Mentasta Lake	13C	118
16	**McCarthy**	11	114
17	**Chitina**	13D	97
18	**Slana/Nabesna Rd**	13C/11/12	95
19	**Gulkana**	13B	89
20	**Dry Creek**	20D	60
21	**Chistochina**	13C	56
22	**Tonsina**	13D	51
23	**Dot Lake**	20D	48
24	**Nelchina**	13A	46
25	**Mendeltna**	13A/D	46
26	**Lake Louise**	13A	40
27	**Paxson**	13B	26
28	**Chase**	13E	25
29	**Healy Lake**	20D	22
30	**Alcan Border**	12	12
31	**Tolsona**	13A/D	35
32	**McCarthy Road**	11	No data
33	**Mentasta Pass (Tok Cutoff Road,**	12	No data
34	**Sheep Mountain**	13A/D	**
35	**Parks Highway MP 216—239**	20A/C	*

	Community	Unit in Which Community is Located	Estimated Population (2022)
	(excluding the residents of Denali Park Headquarters)		
		Total Population	**5,977**

*A population estimate is available only for the entire Denali Park CDP. The population of the CDP as a whole, which also includes Denali Park Village, is 149 (ADLWD 2022).
**Sheep Mountain is Included in the Glacier View population but is kept separate here because independent subsistence survey data are available for Sheep Mountain.

Customary and Direct Dependence upon the Population as the Mainstay of Livelihood

Criterion 1, "customary and direct dependency upon the population as the mainstay of livelihood," is presented only once to avoid repetition across multiple hunt areas.

The range of the NCH falls largely within the traditional territory of the Ahtna Athabascans (de Laguna and McClellan 1981). The winter range of the herd, though variable, also extends east and north into 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). The Ahtna can be divided into four geographical areas corresponding with Ahtna dialects in the nineteenth century: Lower, Central, Upper, and Western Ahtna (Simeone et al. 2019). Western and Central Ahtna historically relied more on the NCH, while the Upper Ahtna relied more on "mountain caribou" (Simeone 2006:3).

Archaeological evidence and historical accounts indicate that caribou have been a primary subsistence resource for both the Ahtna Athabascans and Athabascans of the upper Tanana region, who have hunted caribou seasonally for generations (de Laguna and McClellan 1981, McKennan 1981, Simeone 2006, Haynes and Simeone 2007). The traditional practices of drying and freezing meat, as well as the proper and respectful treatment of caribou are described in several ethnographic accounts of the Ahtna and Athabascans of the upper Tanana region (de Laguna and McClellan 1981, Reckord 1983, Simeone 2006, Haynes and Simeone 2007).

Among the Ahtna, those residing in the northern communities were historically more likely to favor and pursue caribou than those in the southern Ahtna region (Reckord 1983). However, Athabascan cultures are marked by flexibility and adaptability; historically, use of species fluctuated with their availability (Reckord 1983). While fall and spring are the primary traditional hunting seasons (de Laguna and McClellan 1981, McKennan 1981), caribou also provided an important source of food in winter when other resources were not available. Today, caribou continue to be a vital resource for communities within the range of the Nelchina herd (Haynes and Simeone 2007, Holen et al. 2012, Kukkonen and Zimpleman 2012, La Vine et al. 2013, La Vine and Zimpleman 2014, Holen et al. 2015, Godduhn and Kostick 2016, Brown et al. 2017).

Subsistence surveys provide an important source of information about present-day use of caribou and other resources by communities with a customary and traditional use determination for caribou in the range of the NCH. Subsistence surveys seek to capture all harvest, sharing, and use of caribou by surveyed households for a single survey year, under any State or Federal opportunity. Because these surveys only capture a single year, they may not be representative of a community's typical subsistence pattern. For example, caribou may not have been available during the study period due to variation in their migration route. Weather, regulatory constraints, and social variables may also affect harvest levels from year to year. Finally, caribou harvest may appear low in some cases because of harvest redistribution between communities.

Subsistence surveys are conducted every ten to fifteen years, although some small communities in the proposal area were surveyed in the 1980s but were never subsequently studied (e.g. Glacier View, McCarthy Road) (Stratton and Georgette 1984, McMillan and Cuccarese 1988, ADF&G 2024c). Delta Junction and Alcan Border have never been surveyed (ADF&G 2024c). Surveys are usually conducted by ADF&G, Division of Subsistence. For the communities and areas with a customary and traditional use determination for caribou in one or more of the Nelchina hunt areas, subsistence studies were conducted between 1982 and 2015 (ADF&G 2024c).

For a broad view of subsistence harvest by communities included in the analysis, **Table 7** shows how many estimated pounds of wild food were harvested by residents of each community, averaged across all years. In some cases, communities have only been surveyed once, in which case data from that single study year is presented. **Table 7** is included in order to provide a sense of communities' relative reliance on subsistence resources. As shown in **Table 7**, the estimated number of pounds of food harvested per person for each community, averaged across survey years, ranged from 310.8 pounds in Tolsona, to 52.6 pounds in Mendeltna, with a median of 155.2 pounds per person (ADF&G 2024c).

When considering information presented in **Tables 7** to **11**, note that for residents of the Parks Highway MP 216—239 (excluding the residents of Denali Park Headquarters) and Denali Village, survey results are grouped into the results for the entire Denali Park CDP and cannot be presented on a finer geographic scale. Limitations of this approach include the fact that residents with varying uses of caribou are incorporated into the results for the wider CDP, so results should only be extrapolated with caution.

Table 7. Estimated pounds of wild food (all resources) harvested per person in communities included in the analysis, averaged across all survey years (ADF&G 2024c). Communities are sorted from greatest to least estimated number of pounds of wild food harvested per person.

	Community	Unit	Estimated Pounds of Wild Food Harvested Per Person
1	Tolsona	13A/D	310.8
2	Northway	12	278.4
3	Chitina	13D	259.7
4	Paxson	13B	251.6

	Community	Unit	Estimated Pounds of Wild Food Harvested Per Person
5	**Slana/Nabesna Rd**	13C/11/12	235.2
6	**McCarthy Rd**	11	230.2
7	**Healy Lake**	20D	228.5
8	**Tetlin**	12	228.1
9	**Chickaloon**	14A	223.6
10	**Tanacross**	12	208.1
11	**Chase**	13E	202.6
12	**Glacier View**	13A/D	96.1
13	**Mentasta Pass**	12	188.8
14	**Chistochina**	13C	179.3
15	**Copper Center/ Silver Springs**	13D	166.5
16	**Gakona**	13B/C	156.1
17	**Tok**	12	154.7
18	**Tonsina**	13D	151.4
19	**Denali Park CDP**	20A/C	149.6
20	**Lake Louise**	13A	142.5
21	**Dry Creek**	20D	140.1
22	**Gulkana**	13B	135.9
23	**Mentasta Lake**	13C	130.5
24	**Dot Lake**	20D	129.1
25	**Tazlina**	13D	128.8
26	**Nelchina**	13A	128.4
27	**Kenny Lake/Willow Creek**	13D	117.2
28	**Cantwell**	13E	115.8
29	**Glennallen**	13A/D	88.0
30	**McCarthy**	11	86.8
31	**Sheep Mountain**	13A/D	63.4
32	**Mendeltna**	13A/D	52.6

The importance of caribou to each community can be assessed qualitatively and quantitatively. Quantitative assessments of dependence on caribou documented in subsistence surveys include: the percentage of surveyed households using caribou (**Table 8)**, the estimated number of pounds of caribou meat harvested per person (**Table 9)**, the percentage of a community's total wild food harvest composed of caribou (**Table 10)**, and how widely caribou are shared by surveyed households (**Table 11**).

Table 8 shows that the percentage of surveyed households using caribou for each community, averaged across all survey years, ranged from 100% in Healy Lake to 6% in Chickaloon (although it should be noted that Chickaloon has only been surveyed once, in 1982, when no caribou where harvested). The average percentage of surveyed households in a community using caribou was 46% (ADF&G 2024c).

The estimated number of pounds of caribou harvested per person, averaged across all survey years, ranged from 52 lbs. in Healy Lake to 0 lbs. in Chickaloon, and Tolsona (ADF&G 2024c, **Table 9**). For those communities that harvested harvest caribou during their most recent survey year, the resource ranked in the top five resources harvested as measured by edible weight in almost all cases, and ranked in the top two resources for Cantwell, Chase, Healy Lake, Mendeltna, Mentasta Pass, Paxson, Tok, and Tonsina, (ADF&G 2024c).

The percentage of the estimated total wild food harvest composed of caribou, averaged across all survey years, ranged from 23% in Healy Lake to 0% in Chickaloon and Tolsona (ADF&G 2024c, **Table 10**). Averaged across survey years, the percentage of surveyed households receiving caribou ranged between 78% in Dry Creek to 16% in Chistochina, while the percentage of surveyed households giving caribou ranged between 43% in Mentasta Pass and 7% in Dot Lake (ADF&G 2024c, **Table 11**)

Table 8. The percentage of surveyed households in each community using caribou averaged across all survey years (ADF&G 2024c). Communities are ranked from greatest to least percentage of surveyed households using caribou. Communities for which there are no data for this metric were excluded from the table.

	Community	Unit	Percentage of Surveyed Households Using Caribou
1	**Healy Lake**	20D	100%
2	**Dry Creek**	20D	81%
3	**Mentasta Pass**	12	74%
4	**Lake Louise**	13A	64%
5	**Tonsina**	13D	59%
6	**McCarthy Rd**	11	59%
7	**Slana/Nabesna Rd**	13C/11/12	56%
8	**Glennallen**	13A/D	55%
9	**Mentasta Lake**	13C	55%
19	**Gakona**	13B/C	54%
11	**Paxson**	13B	54%
12	**Tanacross**	12	52%
13	**Mendeltna**	13A/D	50%
14	**Tazlina/Copperville**	13D	47%
15	**Gulkana**	13B	46%
16	**Tok**	12	45%
17	**Nelchina**	13A	44%
18	**Northway**	12	44%
19	**Chase**	13E	43%
20	**Cantwell**	13E	43%
21	**Kenny Lake/Willow Creek**	13D	40%
22	**Chistochina**	13C	39%
23	**Denali Park CDP**	20A/C	36%
24	**Glacier View**	13A/D	33%
25	**Tetlin**	12	32%
26	**Chitina**	13D	31%
27	**Copper Center/Silver Springs**	13D	31%
28	**Dot Lake**	20D	29%
29	**Tolsona**	13A/D	25%
30	**McCarthy**	11	23%
31	**Sheep Mountain**	13A/D	22%
32	**Chickaloon**	14A	6%

Table 9. The estimated number of pounds of caribou harvested per person in each community, averaged across all survey years (ADF&G 2024c). Communities are sorted from greatest to least number of pounds of caribou harvested per person. Communities for which there are no data for this metric were excluded from the table.

	Community	Unit	Pounds of Caribou Harvested Per Person
1	**Healy Lake**	20D	52.0
2	**Paxson**	13B	38.2
3	**Mentasta Pass**	12	26.4
4	**Lake Louise**	13A	25.5
5	**Tonsina**	13D	25.1
6	**Chase**	13E	21.4
7	**Tok**	12	19.2
8	**McCarthy Rd**	11	19.1
9	**Cantwell**	13E	17.2
10	**Gakona**	13B/C	17.2
11	**Nelchina**	13A	16.6
12	**Tazlina/Copperville**	13D	16.1
13	**Chitina**	13D	14.8
14	**Copper Center/Silver Springs**	13D	14.8
15	**Dry Creek**	20D	14.3
16	**Chistochina**	13C	13.1
17	**Northway**	12	12.8
18	**Kenny Lake/Willow Creek**	13D	12.3
19	**Dot Lake**	20D	11.3
20	**Glennallen**	13A/D	11.3
21	**Tanacross**	12	11.3
22	**Mendeltna**	13A/D	10.8
23	**Mentasta Lake**	13C	9.2
24	**Tetlin**	12	8.8
25	**Gulkana**	13B	8.1
26	**Denali Park**	20A/C	6.6
27	**Slana**	13C/13	6.2
28	**Glacier View**	13A/D	5.8
29	**McCarthy**	11	5.7
30	**Sheep Mountain**	13A/D	4.6
31	**Tolsona**	13A/D	0.0
32	**Chickaloon**	14A	0.0

Table 10. The percentage of each community's estimated total harvest composed of caribou, averaged across all survey years (ADF&G 2024c). Communities are sorted from greatest to least percentage of the harvest composed of caribou. Communities without data for this metric were excluded from the table.

	Community	Unit	Percentage of Total Harvest Composed of Caribou
1	**Healy Lake**	20D	23%
2	**Mendeltna**	13A/D	21%
3	**Lake Louise**	13A	18%
4	**Tonsina**	13D	17%
5	**Paxson**	13B	15%
6	**Cantwell**	13E	15%
7	**Mentasta Pass**	12	14%
8	**Nelchina**	13A	13%
9	**Glennallen**	13A/D	13%
10	**Tazlina/Copperville**	13D	12%
11	**Tok**	12	12%
12	**Gakona**	13B/C	11%
13	**Chase**	13E	11%
14	**Kenny Lake/Willow Creek**	13D	10%
15	**Dry Creek**	20D	10%
16	**Copper Center/Silver Springs**	13D	9%
17	**Dot Lake**	20D	9%
18	**McCarthy Rd**	11	8%
19	**Chistochina**	13C	7%
20	**Sheep Mountain**	13A/D	7%
21	**Mentasta Lake**	13C	7%
22	**McCarthy**	11	7%
23	**Glacier View**	13A/D	6%
24	**Gulkana**	13B	6%
25	**Chitina**	13D	6%
26	**Tanacross**	12	5%
27	**Northway**	12	5%
28	**Denali Park**	20A/C	4%
29	**Tetlin**	12	4%
30	**Slana/Nabesna Rd**	13C/13	3%
31	**Tolsona**	13A/D	0%
32	**Chickaloon**	14A	0%

Table 11. The percentage of surveyed households giving and receiving caribou in each community, averaged across all survey years (ADF&G 2024c). Communities without data for this metric were excluded from the table.

Community	Unit	Percentage of Surveyed House-holds Receiving Caribou	Percentage of Surveyed House-holds Giving Caribou
Dry Creek	20D	78%	22%
Healy Lake	20D	67%	33%
Mentasta Pass	12	58%	43%
Mentasta Lake	13C	45%	23%
McCarthy Rd	11	41%	12%
Mendeltna	13A/D	40%	20%
Gulkana	13B	37%	15%
Tonsina	13D	34%	25%
Slana/Nabesna Rd	13C/13	34%	14%
Cantwell	13E	32%	17%
Glennallen	13A/D	32%	18%
Tazlina/Copperville	13D	28%	13%
Nelchina	13A	28%	22%
Tanacross	12	28%	9%
Denali Park	20A/C	27%	9%
Tolsona	13A/D	25%	13%
Lake Louise	13A	25%	14%
Kenny Lake/Willow Creek	13D	24%	9%
Gakona	13B/C	23%	21%
Dot Lake	20D	22%	7%
Tetlin	12	22%	14%
Chase	13E	22%	19%
Tok	12	22%	11%
Northway	12	22%	10%
Chitina	13D	21%	12%
Copper Center/Silver Springs	13D	21%	12%
McCarthy	11	21%	8%
Paxson	13B	17%	22%
Chistochina	13C	16%	9%

According to these four measures, those communities for which caribou have been most important during survey years include several to the north of the core NCH range, such as Healy Lake and Dry Creek in Unit 20D, or Tok in Unit 12. However, these communities are likely harvesting caribou from

multiple herds. Tanacross and Tetlin have historically harvested caribou from the Fortymile herd, with additional opportunistic harvest from the Nelchina, Macomb, and Mentasta herds (Koskey 2007).

Based on the metrics above, communities within Unit 13 that exhibit strong or moderate dependence on caribou include Cantwell, Chase, Chistochina, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, Mendeltna, Mentasta Lake, Mentasta Pass, Nelchina, Paxson, Slana/Nabesna Rd (extends across multiple units), Tazlina, and Tonsina. In Unit 11, McCarthy and McCarthy Road also exhibit dependence on caribou. For communities that were last surveyed in the 1980s (Chickaloon, Glacier View, Sheep Mountain, and McCarthy Rd.) it is possible that their use of caribou in a later survey year would have differed from that documented in the original survey year.

While information presented above paints a broad, comparative portrait of subsistence use by communities included in the analysis over time, the next portion of the Criterion 1 analysis ("Community Profiles") presents more detailed information on each community's use of caribou during the most recent survey year, with a focus on documented search areas and the locations in which reported State and Federal caribou harvests occurred. In addition to subsistence surveys, reported hunting and harvest of caribou under both State and Federal hunting opportunities provides another source of information on use of caribou by each community considered in the analysis.

Of note when reviewing reported harvest for each community, Unit 11 is not included because State hunts are closed and the recently established Federal hunt has never been announced. Between 2014 and 2022, only one caribou was harvested in Unit 11, according to State permit records (Mulligan, pers. comm. 2024). For some documented caribou harvest under Federal regulations in Unit 13, the specific subunit where the harvest occurred is unknown. Reported hunting and harvest is likely to be greater in communities with larger populations (see **Table 7** for populations). Detailed breakdowns of hunting and harvest by each community in each subunit under State or Federal permits is included in **Appendix I**.

Community Profiles

McCarthy

The community of McCarthy is located 61 miles east of Chitina, and originally developed around the Kennecott Copper Mine. McCarthy is located within traditional Lower Ahtna territory (Simeone 2006). Railroad access was established in 1911, and the mine operated until 1938 (Stratton and Georgette 1984). At one time, McCarthy was the second largest settlement in Alaska (Stratton and Georgette 1984). Following closure of the mines the settlement was abandoned. In more recent decades, families seeking a rural lifestyle resettled the area (Stratton and Georgette 1984, U.S. Census Bureau 2010, U.S. Census Bureau 2020). The community is surrounded by Wrangell-St. Elias National Park and Preserve. In 2022, McCarthy CDP had an estimated population of 114 (ADLWD 2022).

McCarthy has been surveyed twice by ADF&G, Division of Subsistence (Stratton and Georgette 1984, La Vine and Zimpelman 2014); however, during the first survey McCarthy was grouped with other

small settlements in the region to comprise the "South Wrangell Mountain Sample" (Stratton and Georgette 1984). In 2012, the most recent survey year, and the only year in which McCarthy was surveyed individually, residents of McCarthy harvested an estimated 86.8 pounds of wild food per person (ADF&G 2024c). Sockeye Salmon was the single most important resource harvested, followed by moose (ADF&G 2024c, **Table 12)**. Caribou was the fourth most important resource and accounted for 7% of the total harvest (ADF&G 2024c, **Table 12**). An estimated four caribou were harvested by residents of McCarthy in 2012, resulting in about six pounds of food per person (ADF&G 2024c).

Residents of McCarthy requested that their caribou hunting areas not be mapped for the 2012 study, so no search area map for caribou is available (La Vine and Zimpelman 2014). However, the authors note that some caribou hunting took place along the Denali Highway, quite distant from the community itself (La Vine and Zimpelman 2014). The Denali Highway spans Units 13E and 13B.

Harvest data indicate that between 2014 and 2020 McCarthy Residents reported seven caribou hunts and two harvests under State and Federal opportunity, all of which occurred in Unit 13B (Mulligan, pers. comm. 2024; OSM 2024a).

Table 12. Top resources harvested by edible weight, McCarthy, 2012 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	43%
2	Moose	15%
3	Coho Salmon	8%
4	Caribou	7%
5	Highbush cranberry	3%

McCarthy Road

McCarthy Road, which is distinct from the community of McCarthy, connects the communities of Chitina and McCarthy, following "the southern foot of the Wrangell Mountains in the Chitina River valley east of the Copper River" (Stratton and Georgette 1984: 117). This area was the site of multiple Ahtna settlements and camps. Originally, McCarthy Road was the railbed for the Copper River and Northwestern Railway, until it ceased operation in 1938 and was taken apart during World War II (Stratton and Georgette 1984). There are no current formal population estimates for the McCarthy Road (ADLWD 2022). Portions of the road occur within the Chitina and McCarthy CDPs. A 2024 report for the Federal Highway Administration estimates that there are approximately 13 families living along the road, with recreational cabins also present (Jacobs 2024). It is unknown if any of these families live along a portion of the road within either the Chitina or the McCarthy CDPs.

The McCarthy Road area was the subject of two comprehensive subsistence surveys in the 1980s, one conducted by ADF&G Division of Subsistence (Stratton and Georgette 1984) and one by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In the 1982 to 1983 survey year, species used for subsistence varied along the 60-mile road, reflecting local availability of resources such as salmon (Stratton and Georgette 1984). In 1987, the most recent survey

year, residents of McCarthy Road harvested an estimated 230 pounds of wild food per person (ADF&G 2024c). Sockeye Salmon contributed the most in terms of pounds of food, followed by moose (ADF&G 2024c; **Table 13**). Caribou was the fourth most important resource and accounted for 8% of the total harvest (ADF&G 2024c; **Table 13**). Residents harvested an estimated 6 caribou, resulting in 19 pounds of food per person, and 2 moose, resulting in 27 pounds of food per person (ADF&G 2024c). No information is readily available regarding the location of McCarthy Road residents' caribou harvests.

There were no reported State of Federal caribou hunts or harvests by residents of McCarthy Road for the period 2014 to 2022 (Mulligan, pers. comm. 2024, OSM 2024a), although harvests may have been grouped with those of Chitina or McCarthy.

Table 13. Top resources harvested by edible weight, McCarthy Road, 1987 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	36%
2	Moose	12%
3	Rainbow trout	11%
4	Caribou	8%
5	Chinook Salmon	7%

Mentasta Lake

Mentasta Lake is located "6 miles off the Tok-Slana Cutoff of the Glenn Highway on the west side of Mentasta Pass approximately 38 miles southwest of Tok" (La Vine et al. 2013: 125). Mentasta Lake is located in Unit 13C, near the border with Unit 12. Historically, Mentasta was the easternmost Upper Ahtna village, located near the boundary between Upper Ahtna and Upper Tanana territories and at the northernmost extent of the Copper River drainage (La Vine et al. 2013). Early Ahtna villages were located at strategic fishing areas around Mentasta Lake, and residents relied on salmon, whitefish, caribou, and sheep (Stratton and Georgette 1984). Stratton and Georgette note that Mentasta residents "relied on the Kechemstuck caribou herd 100 miles northeast of Mentasta" (1984: 162). Following population loss due to influenza, the site was resettled by Ahtna from Suslota, Slana, Batzulnetas, and Nabesna (Stratton and Georgette 1984). The community was relocated in 1950 to be closer to the highway (Stratton and Georgette 1984). In 2022, the estimated population of Mentasta Lake CDP was 118 (ADLWD 2022).

Mentasta Lake has been comprehensively surveyed by ADF&G, Division of Subsistence twice (Stratton and Georgette 1984, La Vine et al. 2013), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). However, in the first survey, Division of Subsistence did not identify a separate community of Mentasta Pass (Stratton and Georgette 1984), whereas the two subsequent studies did distinguish between "Mentasta Lake" and "Mentasta Pass," based in part on differences in demographics and resource harvest patterns (McMillan and Cuccarese 1988, La Vine et al. 2013).

In 2010, the most recent survey year, residents of Mentasta Lake harvested an estimated 151 pounds of wild food per person (ADF&G 2024c). Moose was the most important resource in terms of pounds of edible weight, followed by Sockeye Salmon (ADF&G 2024c, **Table 14**). Caribou was the third most important resource and contributed 4% of the total harvest (ADF&G 2024c, **Table 14**). Division of Subsistence estimated that residents of Mentasta Lake harvested five caribou in 2010, resulting in about six pounds of food per person (ADF&G 2024c). Search areas for caribou and moose followed waterways and road corridors. Both were also hunted in Mentasta Lake (La Vine et al. 2013). **Figure 3** shows that Mentasta Lake's harvest of caribou in 2010 occurred in Unit 13C. Mentasta Lake residents rely heavily on large land mammals, especially moose, and expressed concern about local lack of availability of moose (La Vine et al. 2013). There were no reported State or Federal caribou harvests by residents of Mentasta Lake for the period 2014 to 2022, but there were six unsuccessful hunts reported in Unit 13C and two unsuccessful hunts in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a).

Table 14. Top resources harvested by edible weight, Mentasta Lake, 2010 (La Vine et al. 2013, ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Moose	44%
2	Sockeye Salmon	27%
3	Caribou	4%
4	Blueberry	4%
5	Lowbush cranberry	3%

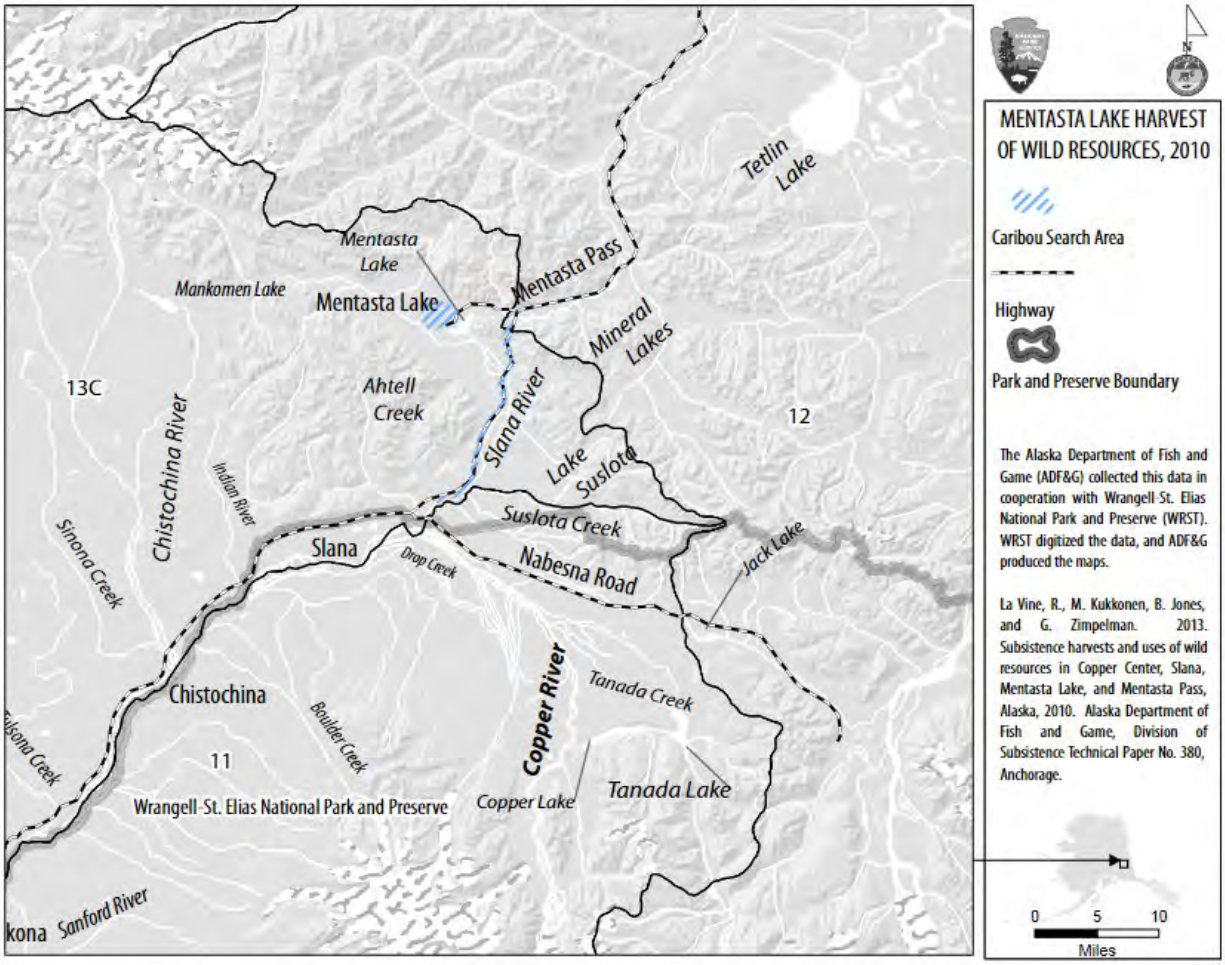

Figure 3. Mentasta Lake's documented caribou search areas, 2010 (La Vine et al. 2013).

Mentasta Pass

Leaving Mentasta Lake, the Tok Cutoff Road leaves the Copper River basin, climbs through Mentasta Pass, and descends into the upper portion of the Tanana River drainage. The Pass separates the Alaska Range to the west from the Mentasta Mountains to the east (La Vine et al. 2013). As defined in subsistence surveys, the community of Mentasta Pass consists of households between miles 79 and 110 of the Tok Cutoff Road (McMillan and Cuccarese 1988, La Vine et al. 2013). The area marks a transition between traditional Upper Ahtna and Upper Tanana culture regions. No official population data are available for Mentasta Pass (ADLWD 2022).

Mentasta Pass has been comprehensively surveyed twice (McMillan and Cuccarese 1988, La Vine et al. 2013). Additionally, a few households along the Tok Road near Mentasta Lake were surveyed as part of the sample for that community in the early 1980s, but whether these households were located within the current Mentasta Pass sample area cannot be determined (Stratton and Georgette 1984). In

2010, residents of Mentasta Pass harvested an estimated 190 pounds of food per person[2] (ADF&G 2024c). The most important resource in terms of edible weight was moose, and caribou was the second most important resource, contributing 16% of the harvest (ADF&G 2024c, **Table 15**). Division of Subsistence estimated that eight caribou were harvested, resulting in 30 pounds of food per person (ADF&G 2024c).

Residents of Mentasta Pass expressed concern about Division of Subsistence only mapping large mammal search areas for 2010, as they did not feel this was a representative year. **Figure 4** shows long-term search and use areas for caribou as reported by residents of Mentasta Pass. Caribou were hunted in Units 13B, 13C, 11, 12, and 20E, and in small portions of Units 13A and 20D (La Vine et al. 2013, **Figure 4**). There were no reported Federal or State caribou hunts or harvest attributed to residents of Mentasta Pass in the area under consideration for the period 2014 to 2022. While it is possible that harvest from Mentasta Pass could have been grouped with that for Mentasta Lake, the latter community also had no reported harvest (Mulligan, pers. comm. 2024, OSM 2024a). However, there were six reported unsuccessful caribou hunts in Unit 13C for Mentasta Lake (Mulligan, pers. comm. 2024).

Table 15. Top resources harvested by edible weight, Mentasta Pass, 2010 (La Vine et al. 2013, ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Moose	46%
2	Caribou	16%
3	Sockeye Salmon	13%
4/5/6	Halibut	2%
4/5/6	Blueberries	2%
4/5/6	Pike	2%

[2] There is a discrepancy between the pounds per person listed in the Community Subsistence Information System (CSIS) (ADF&G 2024c) and the technical paper (La Vine et al. 2013). In these cases, the figure from the CSIS is preferred because information from the report may have been corrected or updated in the database.

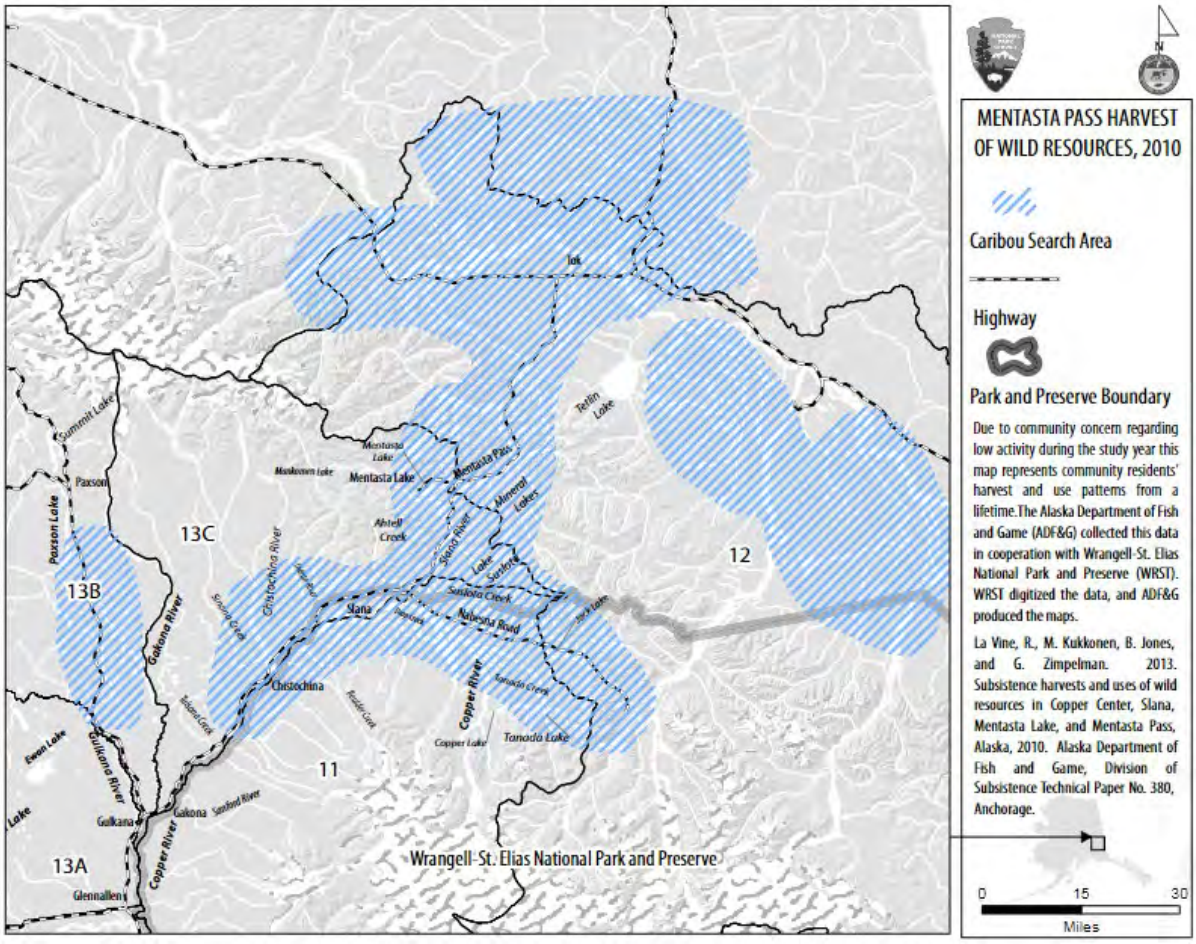

Figure 4. Mentasta Pass' documented search area for caribou. Although the map is labeled "2010," the Division of Subsistence report indicates that residents shared search areas from previous areas as well (La Vine et al. 2013). This likely increased the search areas mapped when compared to communities that only shared search areas from the survey year.

Northway

The community of Northway is located 50 miles southeast of Tok, in Unit 12. Northway is located in traditional Upper Tanana Athabascan territory, where the Nabesna River and the Chisana River join to become the Tanana River (Godduhn and Kostick 2016). According to Godduhn and Kostick, "there is a population cluster at Northway Village, 9 miles from the Alaska Highway, and the remainder of the population is spread along Northway Road and the highway, including smaller clusters near Northway Junction" (2016:6). In 2022, the estimated population of Northway was 233 (ADLWD 2022). This estimate is based on the most recent census for Northway CDP, which was merged with the CDPs for Northway Village and Northway Junction prior to the 2020 U.S. Census (U.S. Census 2020).

Northway has been the subject of multiple subsistence surveys (Haynes et al. 1984, Case 1986, McMillan and Cuccarese 1988, Marcotte 1991, Koskey 2007, Godduhn and Kostick 2016). In 2014, the most recent survey year, the community of Northway was defined as also including three CDPs: Northway, Northway Village, and Northway Junction, as well as a few households outside these

boundaries (Godduhn and Kostick 2016). In 2014, Northway residents harvested an estimated 314 pounds of wild food per person (ADF&G 2024c). The single most important resource in terms of edible weight was Humpback Whitefish, followed by moose (ADF&G 2024c; **Table 16**). Caribou was the sixth most important resource; Division of Subsistence estimated that 13 caribou were harvested, resulting in about nine pounds of food per person (ADF&G 2024c).

Table 16. Top resources harvested by edible weight, Northway, 2004 (ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Humpback Whitefish	30%
2	Moose	25%
3	Sockeye Salmon	8%
4/5	Mallard duck	4%
4/5	Coho Salmon	4%

During the 2014 study year "large land mammals were mostly harvested on the valley floor, and in the hills north of the Alaska Highway" (Godduhn and Kostick 2016: 74), and the area searched for caribou was slightly smaller than that for moose. According to Godduhn and Kostick:

> Two resident herds are found in the upper Tanana River basin: the Macomb caribou herd that ranges around Dot Lake, and the Chisana caribou herd of the Chisana and White river basins. Three other herds (Nelchina, Mentasta, and Fortymile caribou herds) traverse portions of the upper Tanana River basin seasonally. All of these herds are sometimes hunted by residents of Northway, depending on multiple factors, primarily the proximity of their passage. The Nelchina caribou herd, when migrating past the Taylor Highway, is probably the most frequent target of Northway hunters in recent years (2016: 73).

One hundred percent of Northway's reported harvest under either State or Federal opportunities between 2014 and 2022 occurred in Unit 12 (Mulligan, pers. comm. 2024, OSM 2024a). Northway residents reported 94 caribou hunts and 24 caribou harvests in Unit 12 during this time, all of which occurred under Federal opportunity (Mulligan, pers. comm. 2024, OSM 2024a**)**.

Tanacross

The Unit 12 community of Tanacross is located about 12 miles northwest of Tok and is connected to the Alaska Highway by a one-mile road (McMillan and Cuccarese 1988). Tanacross is located in traditional Upper Tanana Athabascan territory. According to Koskey, the people of Tanacross trace their ancestry to the Mansfield-Ketchumstuk Band that resided in settlements at Mansfield Village and Ketchumstuk" (2007: 77). Members of the band moved to "Tanana Crossing" in 1912, and the community was relocated to its present site in 1970 (Koskey 2007). In 2022, the estimated population of Tanacross CDP was 141 (ADLWD 2022).

Tanacross has been the subject of multiple subsistence surveys (Haynes et al. 1984, McMillan and Cuccarese 1988, Marcotte 1991[3], Koskey 2007). Although 2004 was the most recent survey year, this study (Koskey 2007) did not document use of salmon or migratory birds, and the results are therefore not comprehensive. Data from 2004 can still be used to assess caribou use, but not to compare use of caribou to use of all other wild resources. The most recent *comprehensive* survey dates to 1987 (McMillan and Cuccarese 1988). During 1987, residents of Tanacross harvested an estimated 250 pounds of wild food per person (ADF&G 2024c). Moose was the single most important resource, accounting for 35% of the total harvest, followed by all whitefish species, which contributed 27% (ADF&G 2024c). Coho Salmon was the third most important resource (9%), followed by "large" pike (5%). Caribou was the fifth most important resource, contributing 4% of the total harvest; Division of Subsistence estimated that residents of Tanacross harvested eight caribou in 2004, resulting in about 11 pounds of food per person (ADF&G 2024c).

Although salmon were not formally included in the 2004 non-comprehensive survey, Koskey reports that Tanacross residents "reported no harvest of salmon during the 2004 fishing season" (2007: 80). Given this information indicating that inclusion of salmon would not have changed the results, **Table 17** presents ranked resources for 2004. During the 2004 study year, residents harvested an estimated 166 pounds of wild food per person (for those resources surveyed) (ADF&G 2024), which did not include salmon or migratory birds (Koskey 2007). Moose was the most important resource of those documented, followed by Humpback Whitefish (ADF&G 2024c, **Table 17**). Caribou was the third most important resource and accounted for 7% of the documented harvest (ADF&G 2024c, **Table 17**). An estimated 18 caribou were harvested by Tanacross residents in 2004, resulting in 12 pounds of food per person (ADF&G 2024c).

Table 17. Top resources harvested by edible weight, Tanacross, 2004 (ADF&G 2024).

Rank	Resource	Percentage of Total Harvest
1	Moose	66%
2	Humpback Whitefish	10%
3	Caribou	7%
4	Pike	3%
5	Broad Whitefish	2%

Describing the herds that are important to residents of Tanacross, Koskey notes that caribou "constitute an important subsistence resource for the community of Tanacross, though overall harvest numbers remain lower than in communities further upriver" (2007: 81). At the time of the study, Koskey reported that residents harvested primarily from the Fortymile herd, although they also possibly harvested caribou from the Nelchina, Macomb, and Mentasta herds (Koskey 2007). All caribou with a known harvest location were harvested in Unit 12 during the study year (Koskey 2007). A map included in the report depicts caribou search areas documented previously, between 1968 and 1988 (Marcotte 1991, in Koskey 2007, **Figure 5**). There were no reported State of Federal caribou harvests

[3] Two publications resulted from a single survey year (McMillan and Cuccarese 1988, Marcotte 1991).

by residents of Tanacross for the period 2014 to 2022 (Mulligan, pers. comm. 2024, OSM 2024a). There was one reported unsuccessful hunt by a resident of Tanacross in Unit 12 during this time (OSM 2024a).

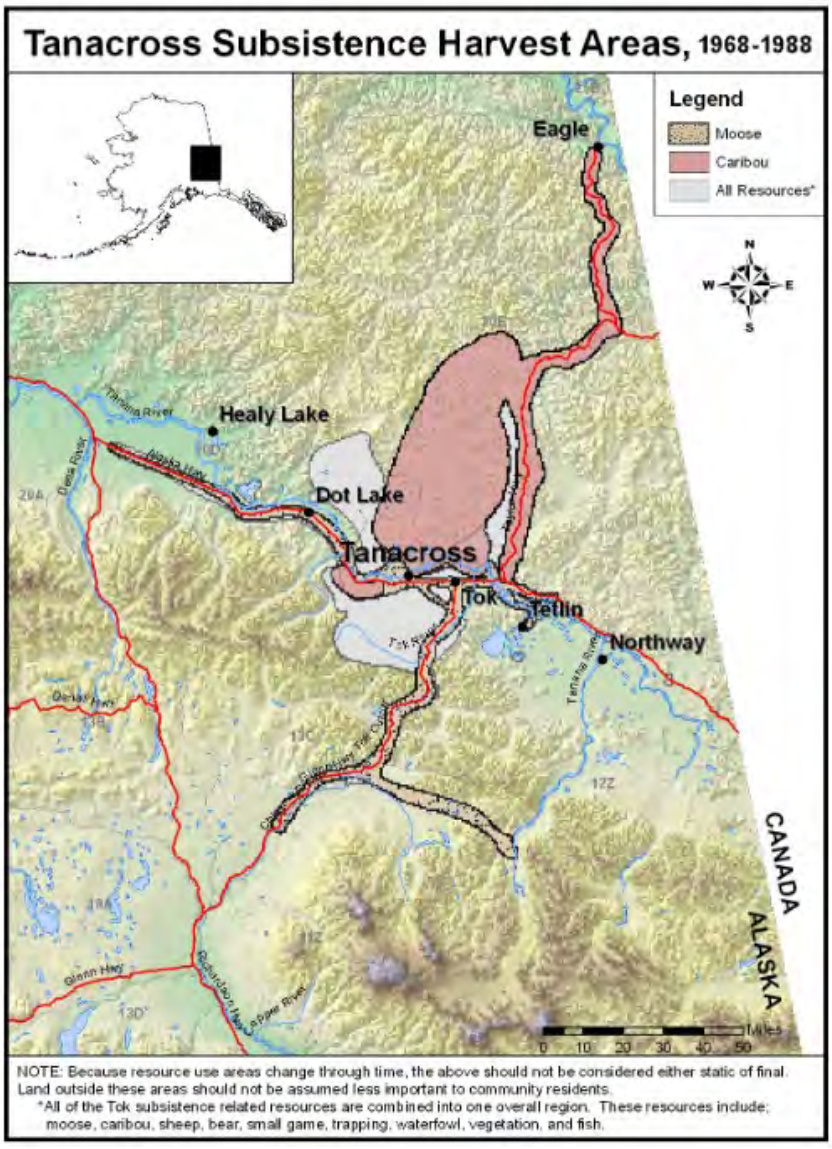

Figure 5. Tanacross' documented search area for caribou and other resources, 1968-1988 (Marcotte 1991, in Koskey 2007).

Tetlin

The community of Tetlin is located about 20 miles southeast of Tok on the Tetlin River (McMillan and Cuccarese 1988), within the Upper Tanana culture area. Residents of the Tetlin area trace their lineage to members of the Tetlin and Last Tetlin bands (Marcotte 1991). A trading post was first established in Tetlin in 1912, and residents at Last Tetlin moved to Tetlin in the late 1920s (Marcotte 1991). In 2022, the estimated population of Tetlin was 140 (ADLWD 2022).

Tetlin has the subject of several subsistence surveys (Haynes et al. 1984, Halpin 1987, McMillan and Cuccarese 1988, Koskey 2007). Although 2004 was the most recent survey year, this study (Koskey 2007) did not document use of salmon or migratory birds, and the results are therefore not comprehensive. Comprehensive surveys are important for understanding the relative importance of species such as caribou. The most recent *comprehensive* survey dates to 1987 (McMillan and Cuccarese 1988). In 1987, residents of Tetlin harvested an estimated 214 pounds of wild food per person (ADF&G 2024). Whitefish harvest was not broken down by species as is typically done in more recent surveys; with that caveat, all whitefish species combined comprised the top resource in terms of edible weight and contributed 49% of the total wild food harvest. Moose made up 30% of the total harvest, and "large" pike made up 5% (ADF&G 2024c). In 1987, researchers estimated that Tetlin residents harvested one caribou, accounting for two pounds of food per person (ADF&G 2024c).

Although salmon were not formally included in the 2004 non-comprehensive survey, Koskey reports that Tetlin residents "reported no harvest of salmon during the 2004 fishing season" (2007: 43). Given this information indicating that inclusion of salmon would not have changed the results dramatically, **Table 18** presents ranked resources for 2004. That year, residents of Tetlin harvested an estimated 242 pounds of wild food per person, for those resources documented (ADF&G 2024c). Moose was the most important resource of those included in the survey, followed by Humpback Whitefish (ADF&G 2024; **Table 18**). Caribou and pike each contributed 6% of the harvest (**Table 18**); residents harvested an estimated 20 caribou, resulting in 15 pounds of food per person (ADF&G 2024c).

Koskey reported that Tetlin residents harvested caribou "primarily from the Fortymile herd, and possibly augmented by the Nelchina, Chisana, Mentasta, and Macomb herds" (2007: 48). The majority of the caribou harvested were taken within Unit 12; the mapped areas where caribou were hunted also reaches into Unit 13C (Koskey 2007, **Figure 6**). There were no Federal or State reported caribou hunts or harvests by residents of Tetlin between 2014 and 2022 (Mulligan, pers. comm. 2024, OSM 2024a).

Table 18. Top resources harvested by edible weight, Tetlin, 2004 ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Moose	59%
2	Humpback Whitefish	25%
3/4	Caribou	6%
3/4	Pike	6%
5	Burbot	2%

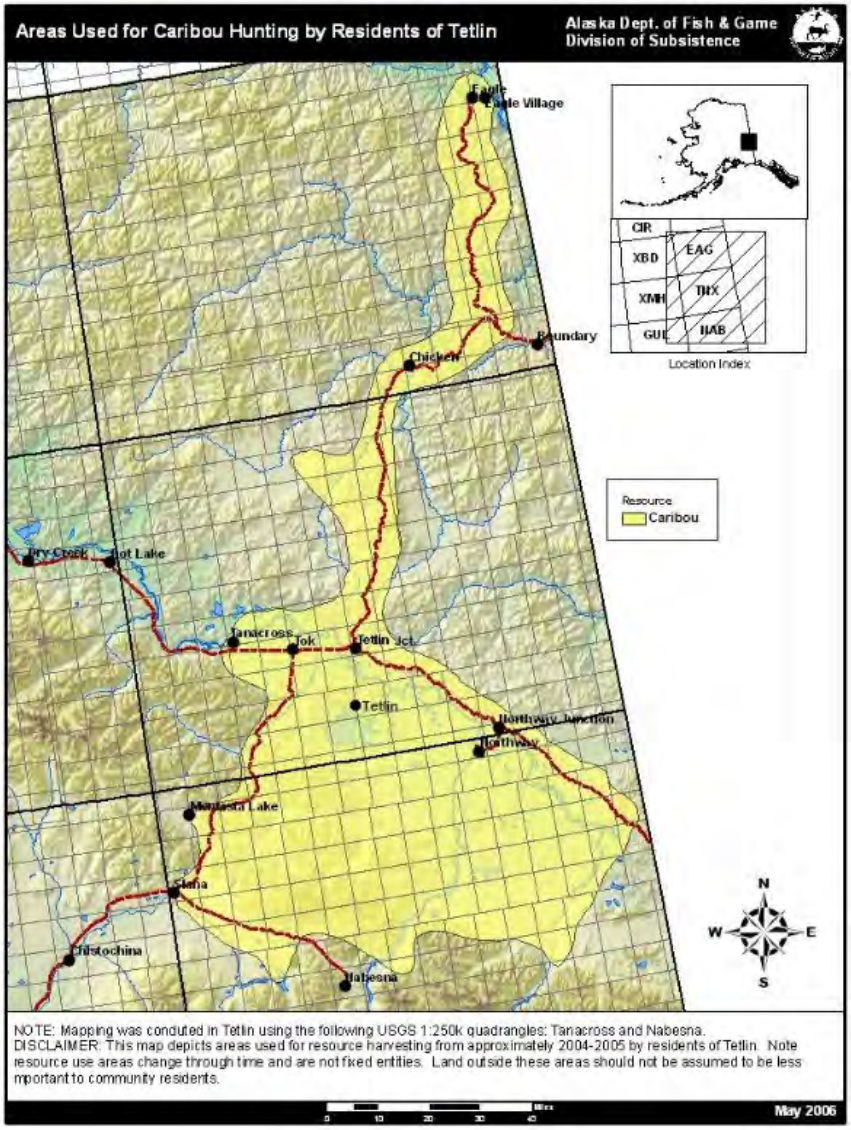

Figure 6. Tetlin's documented search area for caribou, 2004 (Koskey 2007).

Tok

Tok is located at the junction of the Alaska Highway and the Tok Cutoff of the Glenn Highway. The Tok area falls within the traditional Upper Tanana culture area, as well as Unit 12. The settlement began as a highway construction camp in the 1940s and today is the hub for the upper Tanana region (Haynes and Simeone 2007). In 2022, the population of Tok was 1,324 (ADLWD 2022).

Tok has been surveyed multiple times by Division of Subsistence (Haynes et al. 1984, McMillan and Cuccarese 1988, Marcotte 1991[4], Koskey 2007[5], Holen et al. 2012). In 2011, the most recent survey year, residents of Tok harvested an estimated 202 pounds of wild food per person (Holen et al. 2012,

[4] One year of data resulted in two technical reports: McMillan and Cuccarese 1988, Marcotte 1991.
[5] Unpublished report

ADF&G 2024c). Moose was the most important resource in terms of edible weigh (ADF&G 2024c, **Table 19**). Second in importance, caribou contributed 16% of the total harvest (**Table 19**); an estimated 319 caribou were harvested by residents of Tok in 2011, resulting in 32 pounds of food per person (ADF&G 2024c). Caribou search areas "mainly followed the Taylor Highway north of Tok, all the way to the village of Eagle, and west of Tok toward the Alaska–Canada border" (Holen et al. 2012, **Figure 7**). Tok hunters were concerned about the number of non-local hunters using the Tok area to hunt for large land mammals and their impact on the ability of local residents to successfully harvest caribou and moose (Holen et al. 2012). Ninety-eight percent of Tok's reported Federal and State caribou harvest between 2014 and 2022 occurred in Unit 12, with the remaining harvests split among Units 13B, 13C, 13E, and an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a). Residents of Tok reported 461 caribou hunts and 220 caribou harvests in Unit 12 between 2014 and 2022 (Mulligan, pers. comm. 2024, OSM 2024a).

Table 19. Top resources harvested by edible weight, Tok, 2011 (Holen et al. 2012, ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Moose	38%
2	Caribou	16%
3	Sockeye Salmon	13%
4	Coho Salmon	6%
5	Chinook Salmon	4%

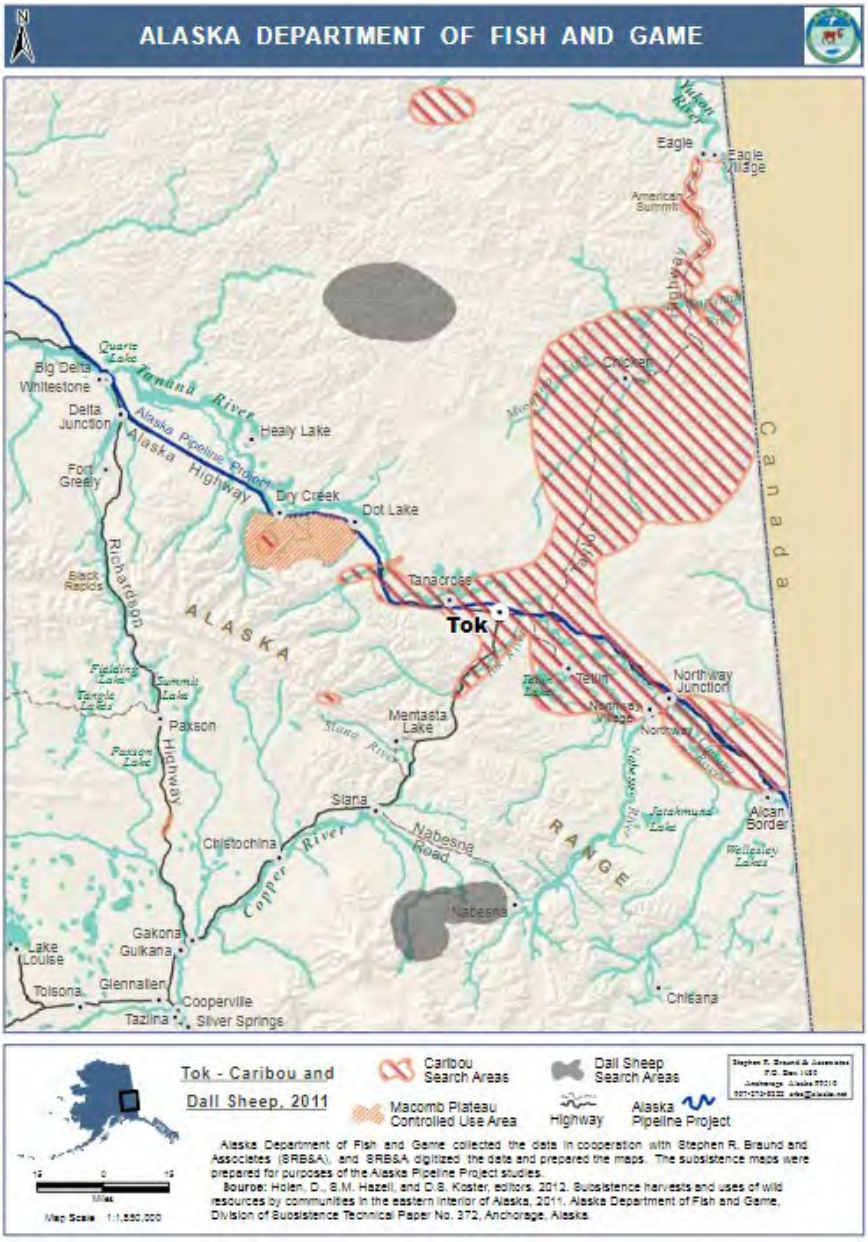

Figure 7. Tok's documented search area for caribou (and sheep), 2011 (Holen et al. 2012).

Alcan Border

In 2022, the estimated population of Alcan Border CDP was 35 (ADLWD 2022). Alcan Border has never been surveyed by Division of Subsistence (ADF&G 2024). Between 2014 and 2022, 100% of Alcan Border's caribou hunts and harvests occurred in Unit 12 (Mulligan, pers. comm. 2024; OSM 2024a). During this time, residents of Alcan Border reported 17 caribou hunts and 6 caribou harvests in Unit 12, all of which occurred under Federal opportunity.

Glacier View and Sheep Mountain

Glacier View is located in Unit 13A, near the boundary with Unit 13D, approximately 32 miles east of Chickaloon on the Glenn Highway. Sheep Mountain is located about four miles east of Glacier View along the Glenn Highway and similarly straddles the 13A/13D boundary. Both communities are located in the traditional Western Ahtna area; the Western Ahtna historically depended on the NCH (Simeone 2006). The communities are presented together because they are located in the same CDP. In 2022, the estimated population of Glacier View CDP, which includes Sheep Mountain (or "Sheep Mountain Lodge"), was 251 (ADLWD 2022); however, the most recent U.S. Census for the Glacier View CDP, conducted just two years earlier, counted 375 residents (U.S. Census Bureau 2020).

Like Chickaloon, Glacier Valley and Sheep Mountain have been surveyed just once by ADF&G, for the June 1982 to May 1983 survey year (ADF&G 2024c, Stratton and Georgette 1984). At the time, the Glacier View was identified as "Matanuska Glacier." Harvest results were reported separately for Matanuska Glacier (Glacier View) and Sheep Mountain. During the study year residents of Matanuska Glacier (Glacier View) harvested an estimated 96 pounds of wild food per person (ADF&G 2024c). Residents used more wild food than they harvested, supplemented by meat obtained from guides and roadkill. Residents also raised livestock at higher rates than other communities in the region (Stratton and Georgette 1984). Although the total amount of food harvested by residents of Matanuska Glacier (Glacier View) was less than that of Chickaloon, moose, salmon, and nonsalmon fish were the top three resources for both communities and contributed similar percentages of the overall harvest in both locations.

Moose was the single most important resource harvested in terms of pounds of edible weight, followed by Sockeye Salmon (ADF&G 2024c, **Table 20**). Caribou was the fourth most important resource in terms of edible eight and made up 6% of the total harvest (ADF&G 2024c, **Table 20**). Residents harvested an estimated nine caribou during the survey year, resulting in about six pounds of food per person (ADF&G 2024c). Stratton and Georgette note that harvest at the time was "limited to holders of drawing permits" (1984: 54). Large land mammals, including caribou, were hunted "in the Talkeetna Mountains north of the Glenn Highway or in the low benches of the Chugach Mountains across the Matanuska River" (Stratton and Georgette 1984:54).

Between 2014 and 2022, Glacier View residents reported 166 caribou hunts and 29 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Seventy-six percent of the community's caribou harvest within the proposal area took place in Unit 13B, 14% in an unknown subunit of Unit 13, and 10% in Unit 13A (Mulligan, pers. comm. 2024, OSM 2024a).

Table 20. Top resources harvested by edible weight, Glacier View, 1982-83 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Moose	47%
2	Sockeye Salmon	9%
3	Coho Salmon	7%
4	Caribou	6%
5	Halibut	5%

During the study year residents of Sheep Mountain harvested an estimated 63 pounds of wild food per person[6] (ADF&G 2024c). Many residents were employed in tourism at times that conflicted with hunting seasons (Stratton and Georgette 1984). However, the amount of wild food used by the community was double that harvested. The difference was composed of moose meat contributed by guides (Stratton and Georgette 1984). Chinook Salmon was the most important resource, followed by moose (ADF&G 2024c, **Table 21**). Caribou was the fifth most important resource and accounted for 7% of the total harvest (ADF&G 2024c, **Table 21**). Residents of Sheep Mountain harvested an estimated two caribou during the study year, resulting in slightly less than five pounds of food per person (ADF&G 2024c). No information is readily available regarding the location of Sheep Mountains caribou search areas. Between 2014 and 2022, residents of Sheep Mountain reported 36 caribou hunts and 12 harvests in the proposal area, all of which occurred under Federal opportunity. Seven of Sheep Mountains' caribou harvests in the proposal area occurred in Unit 13B, and five took place in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a).

Table 21. Top resources harvested by edible weight, Sheep Mountain, 1982-83 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Chinook Salmon	32%
2	Moose	28%
3	Sockeye Salmon	9%
4	Coho Salmon	8%
5	Caribou	7%

Lake Louise

The Unit 13A community of Lake Louise is located on the southwest edge of the lake, 18 miles north of the Glenn Highway and 32 miles from Glennallen (Holen et al. 2015). Lake Louise is located in the Western Ahtna region, where residents have traditionally relied on the NCH (Simeone 2006). Ahtna villages were located on the northern shore of the lake and at the outlet of Tyone Lake in the 1800s; the current settlement began as a result of homesteading in the 1940s (Holen et al. 2015). Today Lake

[6] This amount, taken from the Community Subsistence Information System (ADF&G 2024c) differs from the figure in Stratton and Georgette 1984.

Louise is a popular recreation area, and many residents are seasonal (Holen et al. 2015). In 2022, the estimated population of Lake Louise was 40 (ADLWD 2022).

Lake Louise has been surveyed by ADF&G, Division of Subsistence twice (Stratton and Georgette 1984, Holen et al. 2015), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In 2013, the most recent survey year, Lake Louise residents harvested an estimated 73 pounds of wild food per person (ADF&G 2024c). Of this, moose was the most important single resource, followed by Sockeye Salmon (ADF&G 2024c, **Table 22**). Caribou was the third most important resource and contributed 9% of the total harvest (ADF&G 2024c, **Table 22**). Division of Subsistence estimated that one caribou was harvested by residents of Lake Louise in 2013, contributing seven pounds of food per person (ADF&G 2024c).

Table 22. Top resources harvested by edible weight, Lake Louis 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Moose	32%
2	Sockeye Salmon	11%
3	Caribou	9%
4	Blueberry	9%
5	Halibut	8%

Holen et al. describe surveyed households' search and use areas for moose and caribou (**Figure 8**):

> Moose and caribou search areas included several locations throughout the Copper River Basin in 2013. Moose were sought along the Lake Louise Road, primarily to the west of the road, in Game Management Unit (GMU) 13A...They were also sought in a small area to the west of the Gakona River and east of the Richardson Highway in GMU 13B. Caribou were sought in the same areas as moose, with the addition of a relatively large area to the south of Lake Louise in GMU 13A (2015: 178).

Between 2014 and 2022, residents of Lake Louise reported 67 caribou hunts and 14 harvests under State and Federal opportunities in the proposal area ((Mulligan, pers. comm. 2024, OSM 2024a). Fifty-seven percent of Lake Louise' reported harvest occurred in Unit 13B, 29% occurred in an unknown subunit of Unit 13, and residents also reported harvesting caribou in Units 13A and 13C (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 9**).

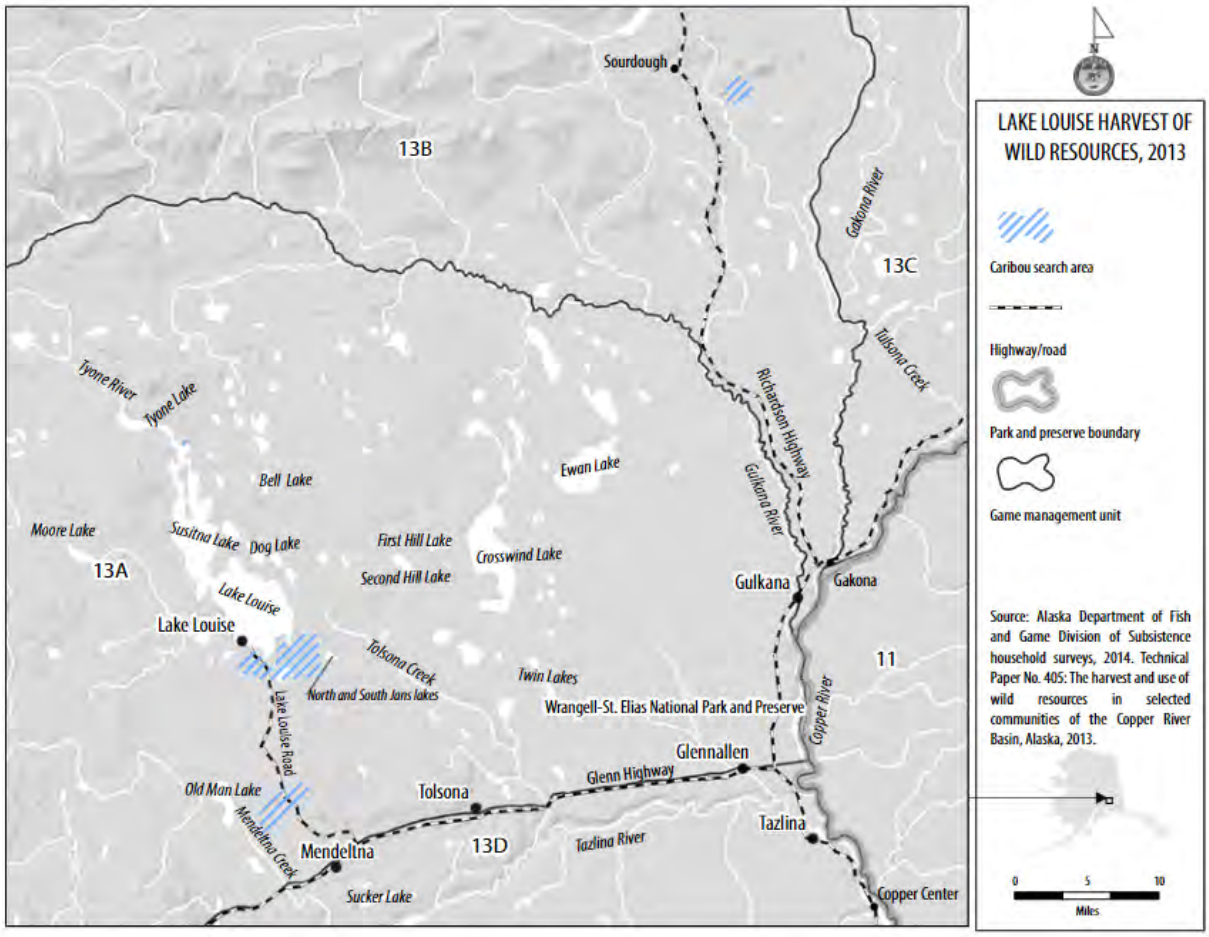

Figure 8. Lake Louise's documented search area for caribou, 2013 (Holen et al. 2015).

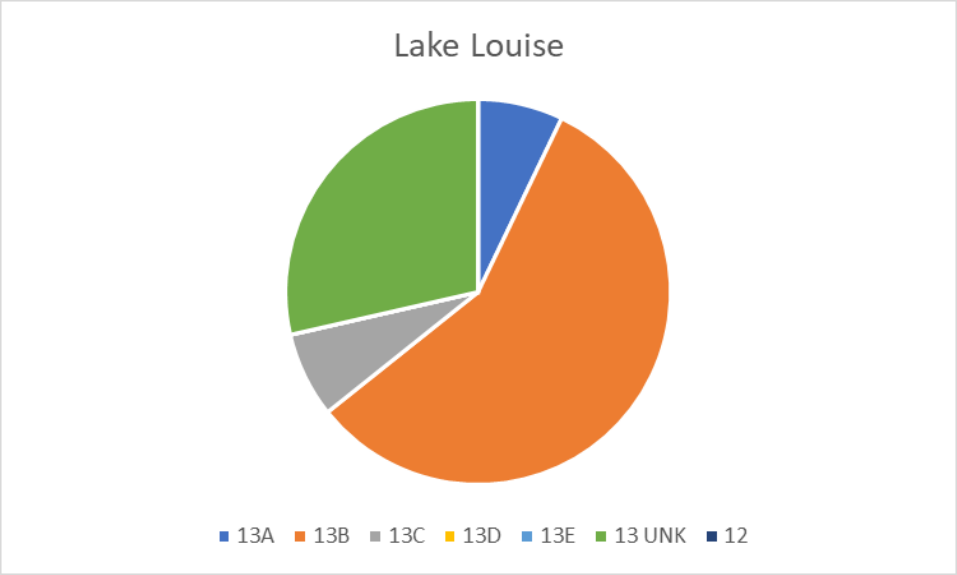

Figure 9. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Lake Louise's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-seven percent of Lake Louise's harvest took place in Unit 13B, 29% in an unknown subunit of Unit 13, and 7% occurred in both Unit 13A and 13C (Mulligan, pers. comm. 2024, OSM 2024a).

East Glenn Highway Communities

The East Glenn Highway Communities of Nelchina, Mendeltna, and Tolsona are all small, lack distinct population centers, and are "interconnected residentially and economically" (Holen et al. 2015). The Glenn Highway, which connects the Matanuska-Susitna and Copper River Basins, was built beginning in 1941, leading to growth of communities along the road (Holen et al. 2015). This area was surveyed comprehensively by ADF&G, Division of Subsistence for the 1982 to 1983 survey year (Stratton and Georgette 1984), and subsequently for the 2013 study year (Holen et al. 2015). Additionally, the area was surveyed by a separate entity in partnership with ADF&G for the 1987 study year (McMillan and Cuccarese 1988). As of 1982 and 1987, separate CDPs had not yet been established and all three areas were considered to be part of one large East Glenn Highway settlement area. During the first two study years, harvest was documented for the area as a whole. For the 2013 study year, Division of Subsistence divided the East Glenn Highway area into community areas and presented harvest separately for Nelchina, Mendeltna, and Tolsona, although data on search and use areas were presented for all three communities combined. The authors noted that residents' perceptions of community boundaries did not align with CDP boundaries (Holen et al. 2015). Only results from the most recent study year, 2013, are presented here.

Nelchina

Nelchina is located approximately 45 miles from the regional hub Glennallen on the Glenn Highway and spans the boundary between Units 13A and 13D. The community is also located near the boundary between the traditional Western and Central Ahtna dialect areas; Ahtna inhabitants of both areas have historically depended on the NCH (Simeone 2006). "Nelchina" is a traditional Ahtna place name for

the area, which was subsequently applied to a mining settlement established in 1913 (Holen et al. 2015). Today Nelchina is "a collection of households stretched along the Glenn Highway from approximately mile 137 to 150" (Holen et al. 2015: 429). According to Holen et al., "new land offerings by the State of Alaska have provided new subdivision development and subsequent construction in…the Nelchina area" (2015: 430). In 2022, Nelchina had an estimated population of 46 residents (ADLWD 2022).

In 2013, residents of Nelchina harvested an estimated 128 pounds of wild food per person (ADF&G 2024c). Moose was the most important species harvested in terms of pounds of edible weight, followed by Sockeye Salmon (ADF&G 2024c, **Table 23**). Third, caribou contributed 13% of the harvest (ADF&G 2024c, **Table 23**). The community harvested an estimated 10 caribou, resulting in 17 pounds of food per person (ADF&G 2024c). The community also received some caribou from roadkill in 2013 (Holen et al. 2015). No caribou search area information is available specific to Nelchina alone, but a map for all three East Glenn Highway communities is included following discussion of Mendeltna and Tolsona's subsistence patterns (**Figure 10)**.

Between 2014 and 2022, residents of Nelchina reported 87 caribou hunts and 13 harvests in the proposal area, all of which occurred under Federal opportunity (Mulligan, pers. comm. 2024, OSM 2024a). Twelve of the thirteen harvests occurred in Unit 13B, and one took place in Unit 13C (Mulligan, pers. comm. 2024, OSM 2024a).

Table 23. Top resources harvested by edible weight, Nelchina 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Moose	45%
2	Sockeye Salmon	17%
3	Caribou	13%
4	Razor clams	6%
5	Blueberry	3%

Mendeltna

Mendeltna is located approximately 31 miles from Glennallen on the Glenn Highway. Holen et al. (2015) define Mendeltna as being located between mile 150 and 166 on the Glenn Highway, "as well as south of the highway along the Nelchina River bordering Tazlina Lake and north of the highway toward Lake Louise" (Holen et al. 2015). The community is located on the boundary between Unit 13A and 13D. Like Nelchina, Mendeltna is also located near the boundary between the traditional Western and Central Ahtna dialect areas; Ahtna inhabitants of both areas have historically depended on the NCH (Simeone 2006). The Ahtna settlement of Mendeltna Village (Bendilna') was located at the juncture of what is today the Glenn Highway and Mendeltna Creek (Stratton and Georgette 1984). Salmon, sheep, and caribou were all important species to this original village; however, the community was largely destroyed by disease in the early 20th century (Stratton and Georgette 1984). The area was

subsequently homesteaded by Euro-American settlers. In 2022, Mendeltna had an estimated population of 46 (ADLWD 2022).

In 2013, Mendeltna residents harvested an estimated 52 pounds of wild food per person (ADF&G 2024c). Sockeye Salmon was the most important resource in terms of pounds of edible weight, followed by caribou, which made up about 21% of the harvest (ADF&G 2024c, **Table 24**). The community harvested an estimated three caribou, resulting in about 11 pounds of food per person (ADF&G 2024c). Although 80% of households attempted to harvest moose, none were successful (Holen et al. 2015). No caribou search area information is available specific to Mendeltna alone, but a map for all three East Glenn Highway communities is included following discussion of Tolsona's subsistence patterns (**Figure 10)**.

Between 2014 and 2022, residents of Mendeltna reported nine caribou hunts and one caribou harvest under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Caribou hunt areas included Units 13A and 13B, and an unknown subunit of Unit 13; the single caribou harvest occurred under State regulations in Unit 13A (Mulligan, pers. comm. 2024, OSM 2024a).

Table 24. Top resources harvested by edible weight, Mendeltna 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	43%
2	Caribou	21%
3	Blueberry	9%
4	Halibut	9%
5	Chinook Salmon	3%

Tolsona

Tolsona is located about 17 miles from Glennallen. It is located in Units 13A and 13D. The Tolsona area falls within the traditional Central Ahtna area, where residents traditionally depended on the NCH (Simeone 2006).

Holen et al. 2015 define Tolsona as being located between mile 167 and 173 on the Glenn Highway. Many Tolsona residences are seasonal (Holen et al. 2015). Of note, "between 1990 and 2000 the westernmost CDP boundary for Glennallen shifted west from Glenn Highway mile 180 to Glenn Highway mile 173" (Holen et al. 2015). This caused households that were considered part of the East Glenn Highway complex in 1982 to be considered Glennallen households in 2013. In 2022, Tolsona had an estimated population of only 12 residents, whereas the population was 30 in 2010 (ADLWD 2022, U.S. Census Bureau 2012), possibly reflecting this boundary shift. According to Holen et al., "several households self-identify with the community of Tolsona but lie outside of the CDP boundaries, falling within either the Mendeltna CDP or the Glennallen CDP" (2015: 537).

In 2013, residents of Tolsona harvested an estimated 311 pounds of wild foods per person (ADF&G 2024c). This is roughly six times the estimated harvest in Mendeltna, 14 miles west of Tolsona. Sockeye Salmon was the most important resource in terms of edible weight, followed by moose (ADF&G 2024c, **Table 25**). No caribou were harvested during the study year, although 25% of surveyed households received and used caribou meat (ADF&G 2024c). Although caribou are considered an important subsistence resource by residents of Tolsona, in 2013 a relatively low number of households attempted to harvest caribou, and none were successful. No caribou search area information is available specific to Tolsona alone, but a map for all three East Glenn Highway communities follows in the next section (**Figure 10)**.

Between 2014 and 2022, residents of Tolsona reported 97 caribou hunts and 26 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Seventy-seven percent of Tolsona's reported harvest occurred in Unit 13B, 15% took place in an unknown subunit of Unit 13, and the remainder occurred in Unit 13C (Mulligan, pers. comm. 2024, OSM 2024a).

Table 25. Top resources harvested by edible weight, Tolsona 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	39%
2	Moose	36%
3	Halibut	6%
4	Burbot	3%
5	Blueberry	2%

East Glenn Highway Community Search and Use Area

In 2013 Nelchina, Mendeltna, and Tolsona residents hunted for caribou primarily within Units 13A and 13B (Holen et al., **Figure 10)**. Caribou were hunted "within an area north of the Glenn Highway along the Little Nelchina River, along the Glenn Highway from Mendeltna east to Glennallen, and in a large area to the east and west of the Richardson Highway north of Sourdough and south of Paxson" (Holen et al. 2015: 528). Caribou were also hunted east of Lake Louise and near Tolsona Lake (Holen et al. 2015).

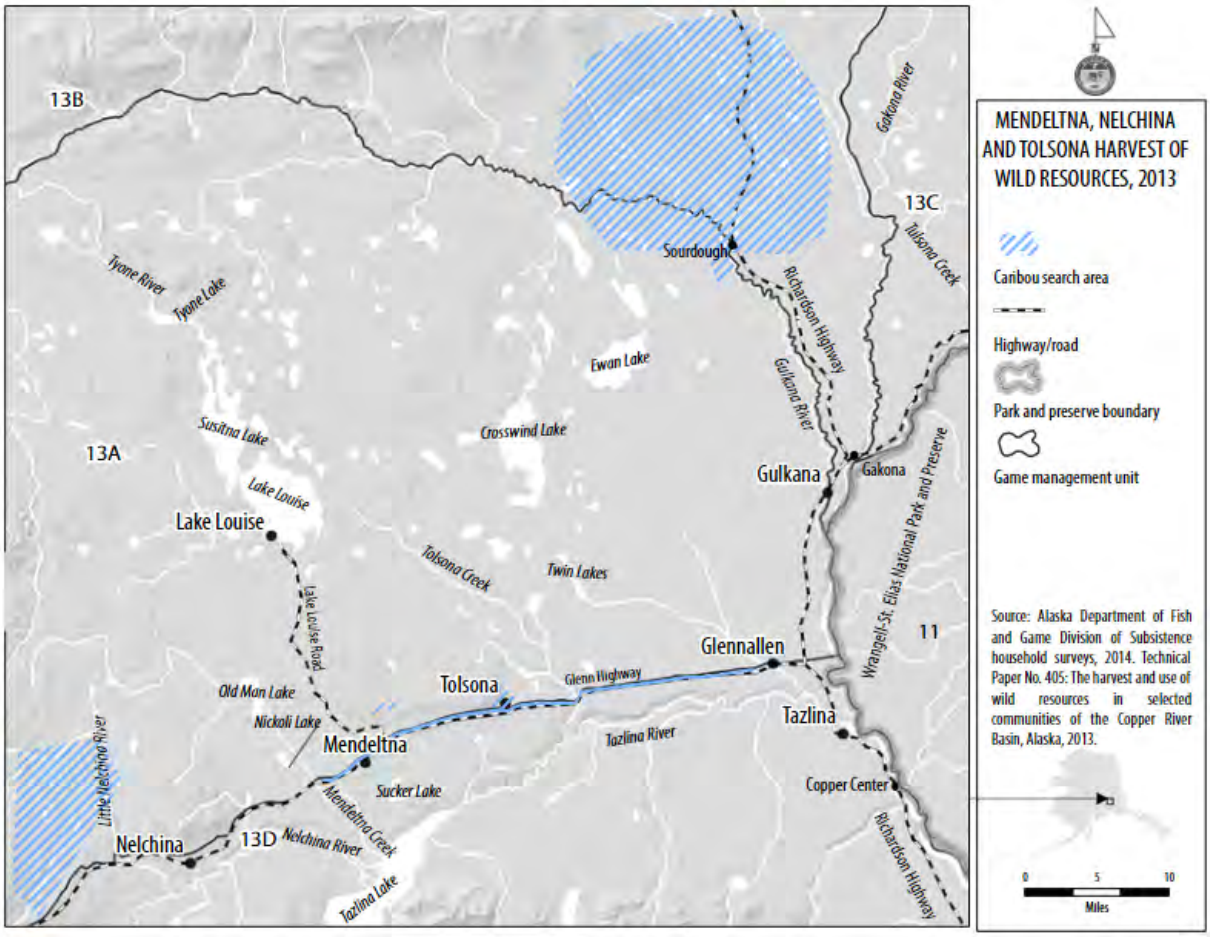

Figure 10. Documented search areas documented for residents of Mendeltna, Nelchina, and Tolsona for the 2013 study year (Holen et al. 2015).

Glennallen

Glennallen is a regional hub for the Copper River basin, located at the junction of the Glenn and Richardson highways, and on the boundary between Unit 13A and 13D. This area was within the traditional territory of the Central Ahtna Gulkana-Gakona band, and a traditional village was located near the site of present-day Glennallen (Stratton and Georgette 1984, Holen et al. 2015, Simeone et al. 2019). The Central Ahtna traditionally relied on the NCH (Simeone 2006). The current settlement of Glennallen developed around highway construction beginning in the 1940s and was bolstered by evangelical mission activity and settlement (Holen et al. 2015). In 2022, the estimated population of Glennallen was 427 (ADLWD 2022).

Glennallen has been surveyed by ADF&G, Division of subsistence twice (Stratton and Georgette 1984, Holen et al. 2015), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In 2013, the most recent survey year, Glennallen residents harvested an estimated 98 pounds of wild food per person (ADF&G 2024c). Sockeye Salmon was the single most important resource in terms of pounds of edible weight, followed by moose (ADF&G 2024c, **Table 26**). Caribou was the third most important resource in terms of edible weight and contributed

9% of the community's total harvest (ADF&G 2024c, **Table 26**). An estimated 27 caribou were harvested in 2013, resulting in nine pounds of food per person (ADF&G 2024c).

Table 26. Top resources harvested by edible weight, Glennallen 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	48%
2	Moose	17%
3	Caribou	9%
4	Chinook Salmon	6%
5	Coho Salmon	4%

Although moose was used by more households than used caribou, slightly more households harvested caribou than harvested moose (Holen et al. 2015). Surveyed residents of Glennallen hunted for moose and caribou "on the highway system along the Glenn, Richardson, and Denali highways and Glenn-Highway-Tok Cutoff (Holen et al. 2015, **Figure 11**). Both moose and caribou were hunted off the Denali Highway near Tangle Lakes" (Holen et al. 2015: 62, **Figure 11**).

Between 2014 and 2022, residents of Glennallen reported 1,804 caribou hunts and 464 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Sixty-two percent of Glennallen's reported harvest took place in Unit 13B, 21% in Unit 13A, and smaller amounts in Units 13C, 13D, and 13E; harvest also occurred in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 12**).

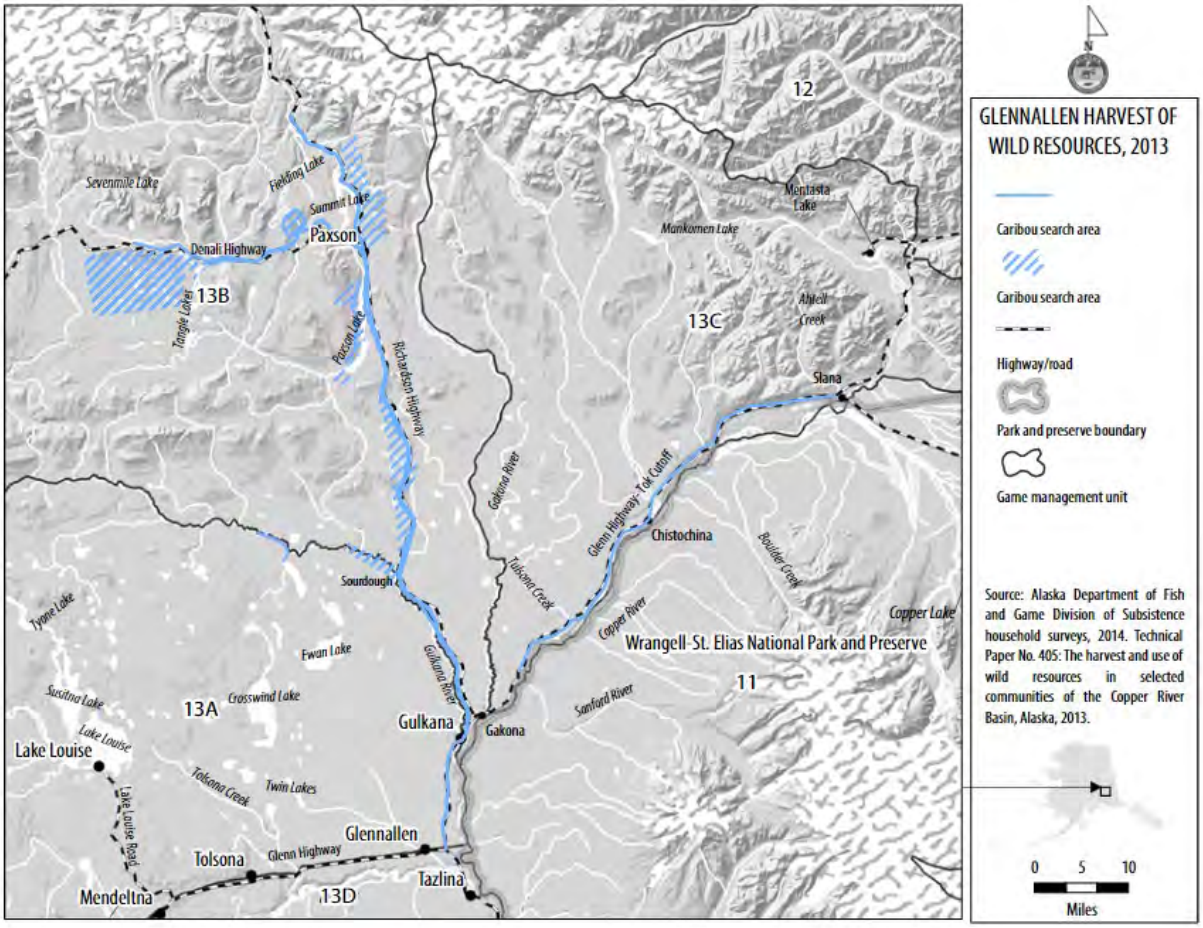

Figure 11. Glennallen's search area for caribou, 2013 (Holen et al. 2015).

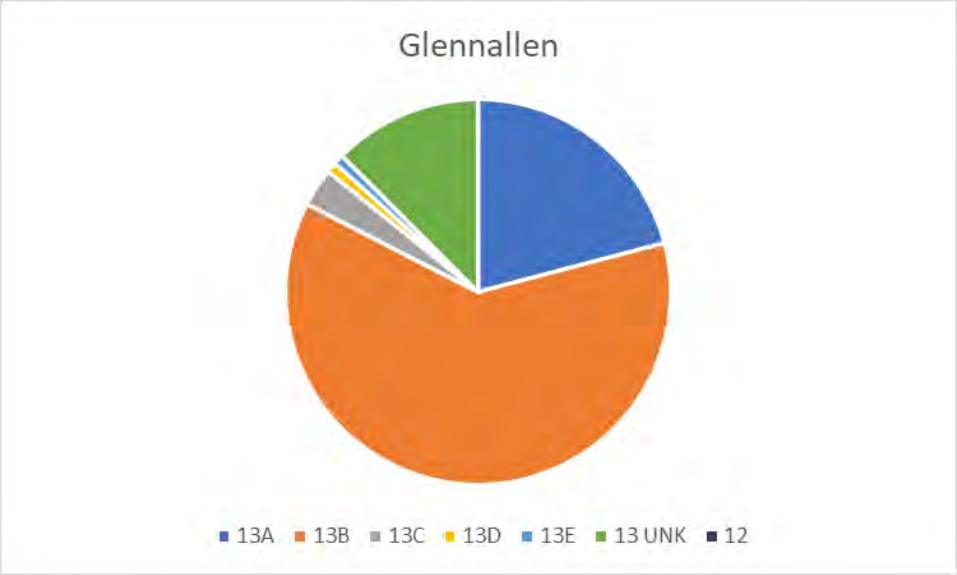

Figure 12. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Glennallen's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Sixty-two percent of Glennallen's harvest took place in Unit 13B, 21% in Unit 13A, 13% in an unknown subunit of Unit 13, and smaller amounts in Units 13C, 13D, and 13E (Mulligan, pers. comm. 2024, OSM 2024a).

Paxson

Paxson has been the subject of two subsistence surveys (McMillan and Cuccarese 1988, Holen et al. 2015). Although Sourdough has been grouped with Paxson in the past, Sourdough has since been depopulated (Holen et al. 2015). In 2022 the estimated population of Paxson was 26 (ADLWD 2022). In 2013, the most recent year in which Paxson was surveyed, residents harvested an estimated 214 pounds of food per person (ADF&G 2024c). Caribou was the top resource harvested in terms of edible weight, accounting for 21% of the total harvest, followed by moose (ADF&G 2024c, **Table 27**). An estimated 11 caribou were harvested, resulting in about 45 pounds of food per person (ADF&Gc).

According to Holen et al., "during the 2013 study year, Paxson households reported hunting caribou along the Denali Highway from Paxson in the east to Crazy Notch in the west, within the Maclaren River watershed, around Long Tangle Lake, Round Tangle Lake, Upper Tangle Lake, Tangle Lakes, Dickey Lake, and along the southern and western shores of Summit Lake" (2015: 235). These areas fall within Unit 13B (**Figure 13)**.

Between 2014 and 2022, residents of Paxson reported 63 caribou hunts and 11 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Paxson residents reported hunting in Unit 13B and an unknown subunit of Unit 13; nine reported harvests took place in Unit 13B, and two occurred in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a).

Table 27. Top resources harvested by edible weight, Paxson 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Caribou	21%
2	Moose	18%
3	Sockeye Salmon	13%
4	Coho Salmon	12%
5	Beaver	5%

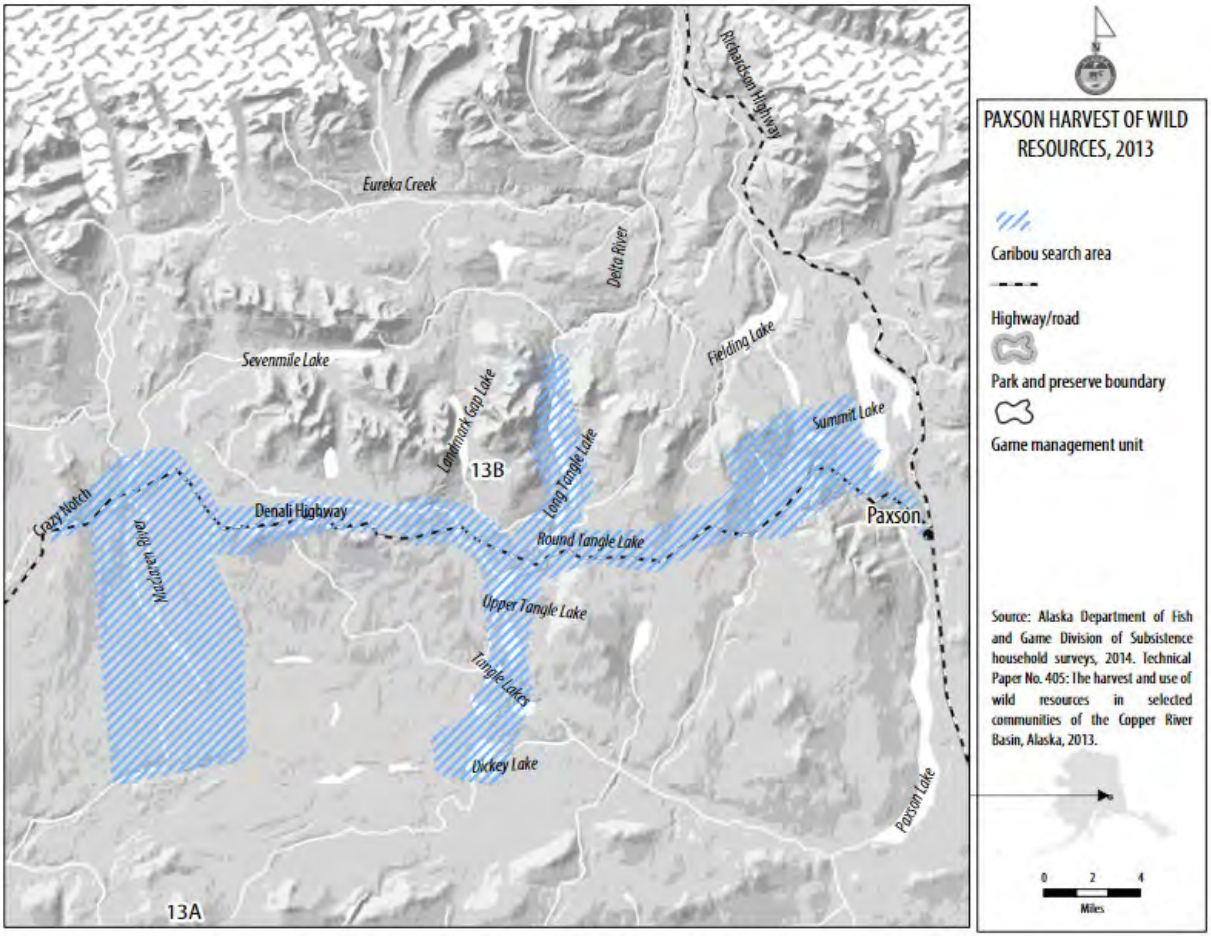

Figure 13. Paxson's documented search area for caribou, 2013 (Holen et al. 2015).

Gulkana

The Unit 13B community of Gulkana is located nine miles north of Glennallen on the Richardson Highway. The community is located in the Central Ahtna region, where people traditionally relied on the NCH (Simeone 2006). An Ahtna village was located close to the current settlement, and the area was also used seasonally (Stratton and Georgette 1984). According to Holen et al., "the contact experience for the people living in Gulkana differs significantly from that of their relatives to the south in Copper Center and Chitina. The number of Euro-Americans who came to settle in the immediate vicinity was comparatively small" (2015: 87). Following construction of the Richardson Highway the

community moved to its current location, which has only been occupied since the late 1960s (Holen et al. 2015). Division of Subsistence identified two distinct subcommunities: a non-Native settlement between miles 125 and 130 along the Richardson Highway and a Native village located north of the confluence of the Gulkana and Copper rivers (Holen et al. 2015). In 2022, the estimated population of Gulkana was 89 (ADLWD 2022).

Gulkana has been comprehensively surveyed by ADF&G, Division of Subsistence twice (Stratton and Georgette 1984, Holen et al. 2015), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In 2013, the most recent survey year, residents of Gulkana harvested an estimated 144 pounds of wild food per person (ADF&G 2024c). The most important resource in terms of pounds of edible weight was Sockeye Salmon, followed by moose (ADF&G 2024c, **Table 28**). Caribou tied with Humpback Whitefish as the fourth most important resource, contributing 3% of the total harvest (ADF&G 2024c, **Table 28**).

Table 28. Top resources harvested by edible weight, Gulkana, 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	49%
2	Moose	17%
3	Chinook Salmon	12%
4/5	Caribou	3%
4/5	Humpback Whitefish	3%

During the study year residents of Gulkana harvested an estimated three caribou, resulting in about four pounds of food per person (ADF&G 2024c). Gulkana households reported that 2013 was a poor year for caribou:

> Many Gulkana households that hunt caribou reported a lack of opportunity to harvest the migrating Nelchina herd as it crossed the Richardson Highway. In 2013, the lack of opportunity stemmed from the yearly quota of 2,500 Nelchina caribou being reached in the fall season (season ends September 20), which resulted in the winter season not opening. As a general rule, the Nelchina herd migrates across the Richardson Highway around the third week of October and the state and federal winter hunts are opened during this time. Because there was no winter season in regulatory year 2013, hunters missed the opportunity to hunt during the period when caribou were actively crossing the Richardson Highway (Holen et al. 2015: 120).

Residents of Gulkana traveled in search of caribou along the Richardson Highway between Sourdough and Paxson (Holen et al. 2015, **Figure 14**).

Between 2014 and 2022, residents of Gulkana reported 57 caribou hunts and eight harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Six harvests occurred in Unit 13B, one harvest occurred in Unit 13A, and one harvest took place in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a).

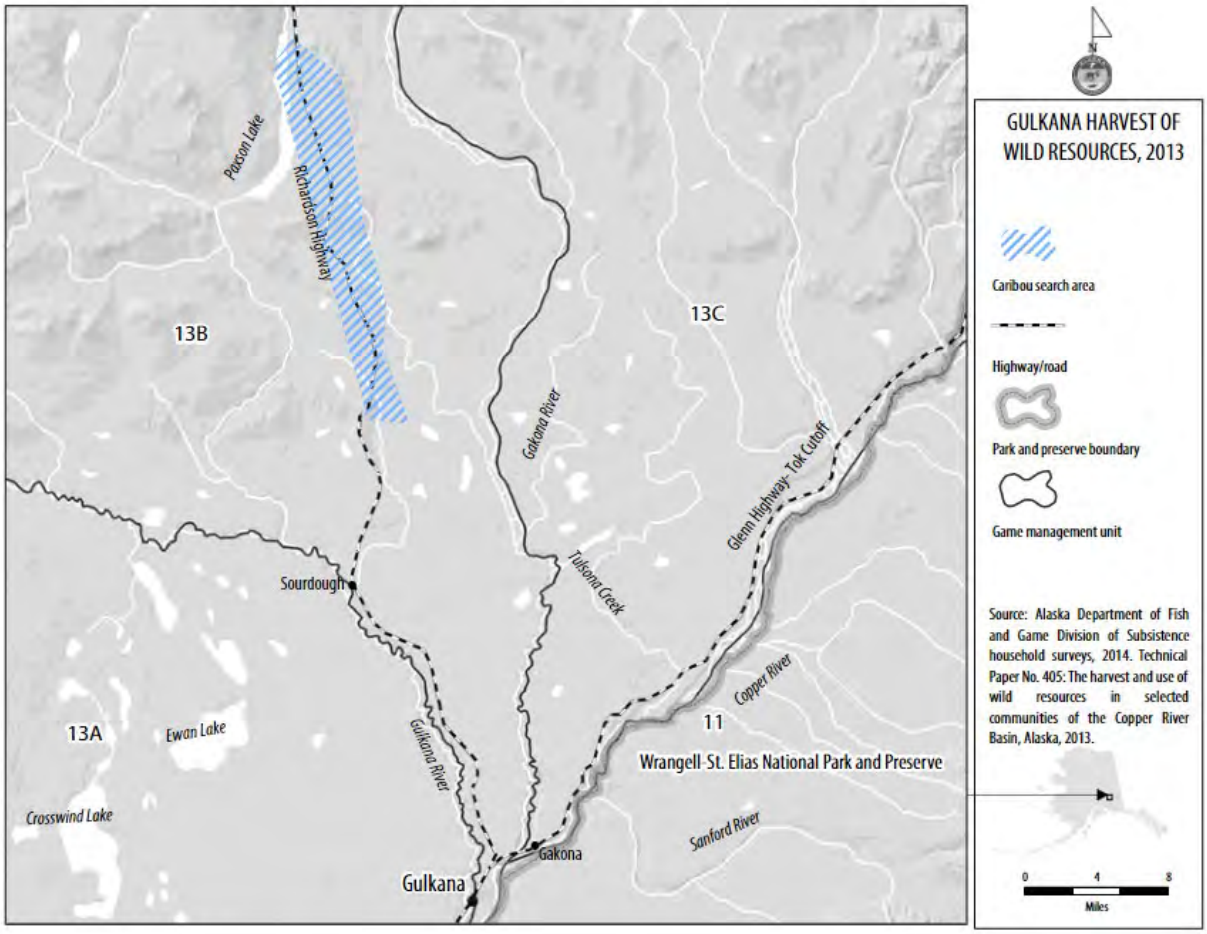

Figure 14. Gulkana's documented search area for caribou in 2013 (Holen et al. 2015).

Chistochina

The community of Chistochina is located at Mile 32.7 on the Tok Cutoff of the Glenn Highway, approximately 42 miles northeast of Glennallen (Kukkonen and Zimpelman 2012). Chistochina is within Unit 13C, and is also located near the boundary between the Central and Upper Ahtna areas (Simeone 2006). The Chistochina area was likely the site of an Ahtna fish camp (Kukkonen and Zimpelman 2012). According to Simeone, Ahtna living north of Chistochina historically relied on "mountain caribou," which he contrasts with Nelchina caribou (Simeone 2006). A new village site was established after construction of the Glenn Highway (Kukkonen and Zimpleman 2012). In 2022, Chistochina had an estimated population of 56 (ADLWD 2022).

Chistochina has been comprehensively surveyed by ADF&G, Division of Subsistence twice (Stratton and Georgette 1984, Kukkonen and Zimpelman 2012), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In 2009, the most recent survey year, residents of Chistochina harvested an estimated 162 pounds of wild food per person (ADF&G 2024c). Sockeye Salmon was the single most important resource, followed by moose (ADF&G 2024c). Fifteen percent of households attempted to harvest caribou in 2009, but none were successful (Kukkonen and

Zimpelman 2012, ADF&G 2024c). However, 11% of households used caribou that they received from others (Kukkonen and Zimpelman 2012).

Areas where residents of Chistochina searched for caribou in 2009 "included the Nabesna Road corridor and a separate search area along the Denali Highway east of Paxson" (Kukkonen and Zimpelman 2012: 51), areas that fall within Unit 13C, 13B, 11, and a small portion of 12 (**Figure 15**). In comparison to previous surveys, there was less activity for caribou and other species on the south side of Chistochina and around the Boulder Creek area (Kukkonen and Zimpelman 2012).

Residents of Chistochina who were surveyed by Division of Subsistence reported that there were few moose or caribou close to the community in 2009. When caribou arrive in the area after the season has closed, residents may be unable to harvest them. Some households attempted to harvest brown bears, black bears, and Dall sheep, but none were successful (Kukkonen and Zimpelman 2012). Because of the relative difficult harvesting moose and caribou in 2009, residents of Chistochina increased their reliance on salmon (Kukkonen and Zimpelman 2012). Some respondents said that regulations limited their ability to hunt as many moose as they needed (Kukkonen and Zimpelman 2012). Residents also said that they were facing increased competition for large game with outsiders (Kukkonen and Zimpelman 2012).

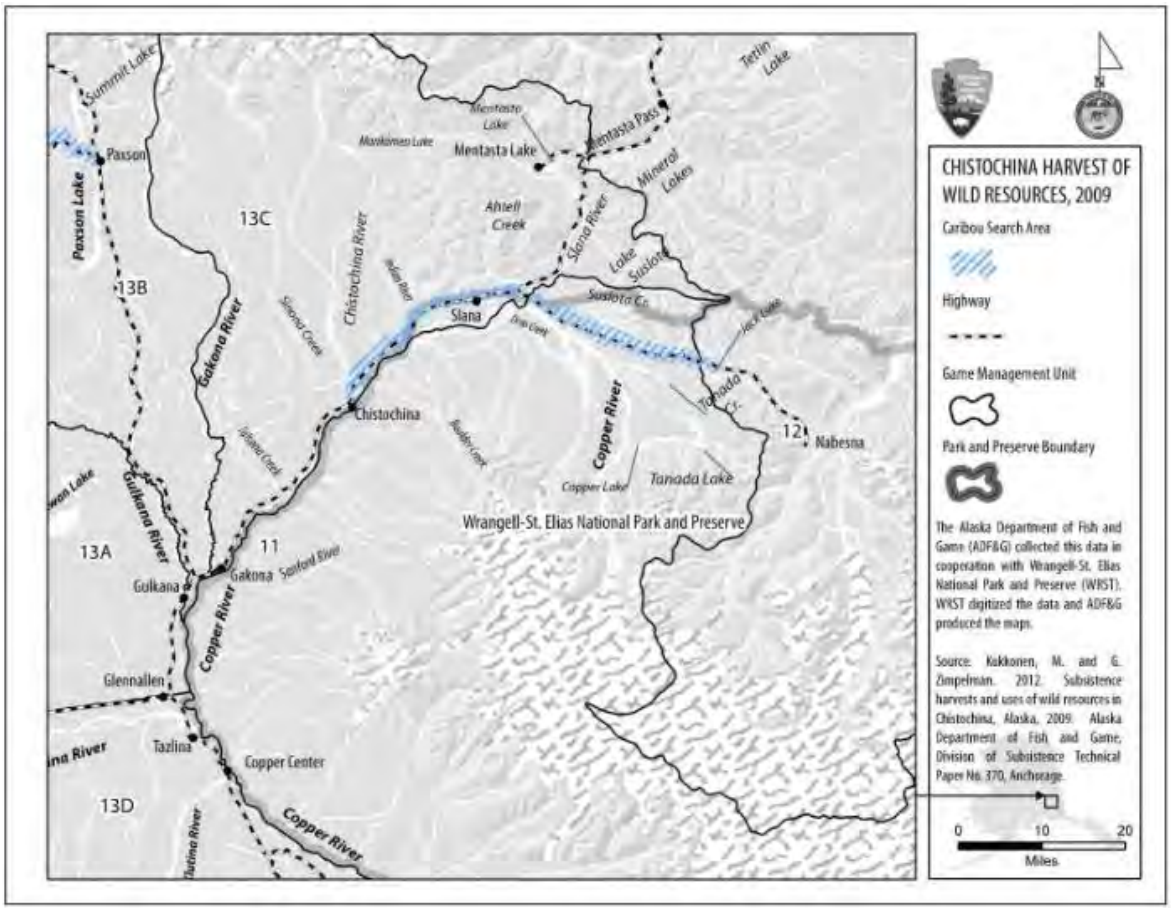

Figure 15. Chistochina's documented search area for caribou, 2009 (Kukkonen and Zimpelman 2012).

Chistochina residents reported that 2009 was an atypical representation of their harvest and use of caribou, and data from a previous study year is available (McMillan and Cuccarese 1988, ADF&Gc). In 1987, residents of Chistochina harvested an estimated 262 pounds of wild food per person (ADF&Gc). As in 2009, Sockeye Salmon, moose, and Chinook Salmon were the top three resources, in that order. However, unlike in 2009 when no caribou were harvested, in 1987, caribou was the fourth most important resource in terms of pounds of edible weight harvested (ADF&Gc). Caribou contributed 9% of the total harvest that year (ADF&Gc). Division of Subsistence estimated that 15 caribou were harvested, contributing about 24 pounds of food per person (ADF&Gc). There is no readily available information on Chistochina's caribou search areas prior to 2009 (Stratton and Georgette 1984, McMillan and Cuccarese 1988).

Table 29. Top resources harvested by edible weight, Chistochina, 1987 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	34%
2	Moose	20%
3	Chinook Salmon	10%
4	Caribou	9%
5	Coho Salmon	6%

There were no reported Federal or State caribou harvests by residents of Chistochina in the proposal area between 2014 and 2022 (Mulligan, pers. comm. 2024, OSM 2024a). However, there were 5 reported unsuccessful hunts in Unit 13B, 6 in Unit 13C, and 4 in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a).

Gakona

The Unit 13B and 13C community of Gakona is located about 19 miles from Glennallen on the Glenn Highway-Tok Cutoff and the confluence of the Copper and Gakona rivers (La Vine and Zimpelman 2014). The community is located in the Central Ahtna area, where people traditionally relied on Nelchina caribou (Simeone 2006). A seasonal Ahtna camp was located in the area and a trading post and post office were established in 1905 (Stratton and Georgette 1984). In 2022, Gakona had an estimated population of 181 (ADLWD 2022).

Gakona has been comprehensively surveyed by ADF&G, Division of Subsistence twice (Stratton and Georgette 1984, La Vine and Zimpelman 2014), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In 2012, the most recent survey year, residents of Gakona harvested an estimated 171 pounds of food per person (ADF&G 2024c). Sockeye Salmon was the top resource in terms of edible weigh, followed by moose (ADF&G 2024c, **Table 30**). Caribou was the third most important resource and contributed 7% of the total harvest (ADF&G 2024c, **Table 30**). During the study year Division of Subsistence estimated that residents of Gakona harvested 18 caribou, resulting in 12 pounds of food per person (ADF&G 2024c).

Table 30. Top resources harvested by edible weight, Gakona, 2012 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	50%
2	Moose	17%
3	Caribou	7%
4	Beaver	6%
5	Chinook Salmon	5%

Gakona residents hunted caribou away from the community along the Richardson and Denali highways in Units 13B and 13C (La Vine and Zimpelman 2014, **Figure 16**). Residents also reported that they "had to search for longer periods of time and go farther to harvest moose and caribou in 2012. According to local residents, large land mammal resources have been declining over the past 20 years" (La Vine and Zimpelman 2014: 139).

Between 2014 and 2022, residents of Gakona reported 674 caribou hunts and 158 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Seventy-two percent of Gakona's reported Federal and State caribou harvest took place in Unit 13B, 22% in an unknown subunit of Unit 13, 4% in Unit 13C, and smaller amounts in Units 13E and 13A (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 17**).

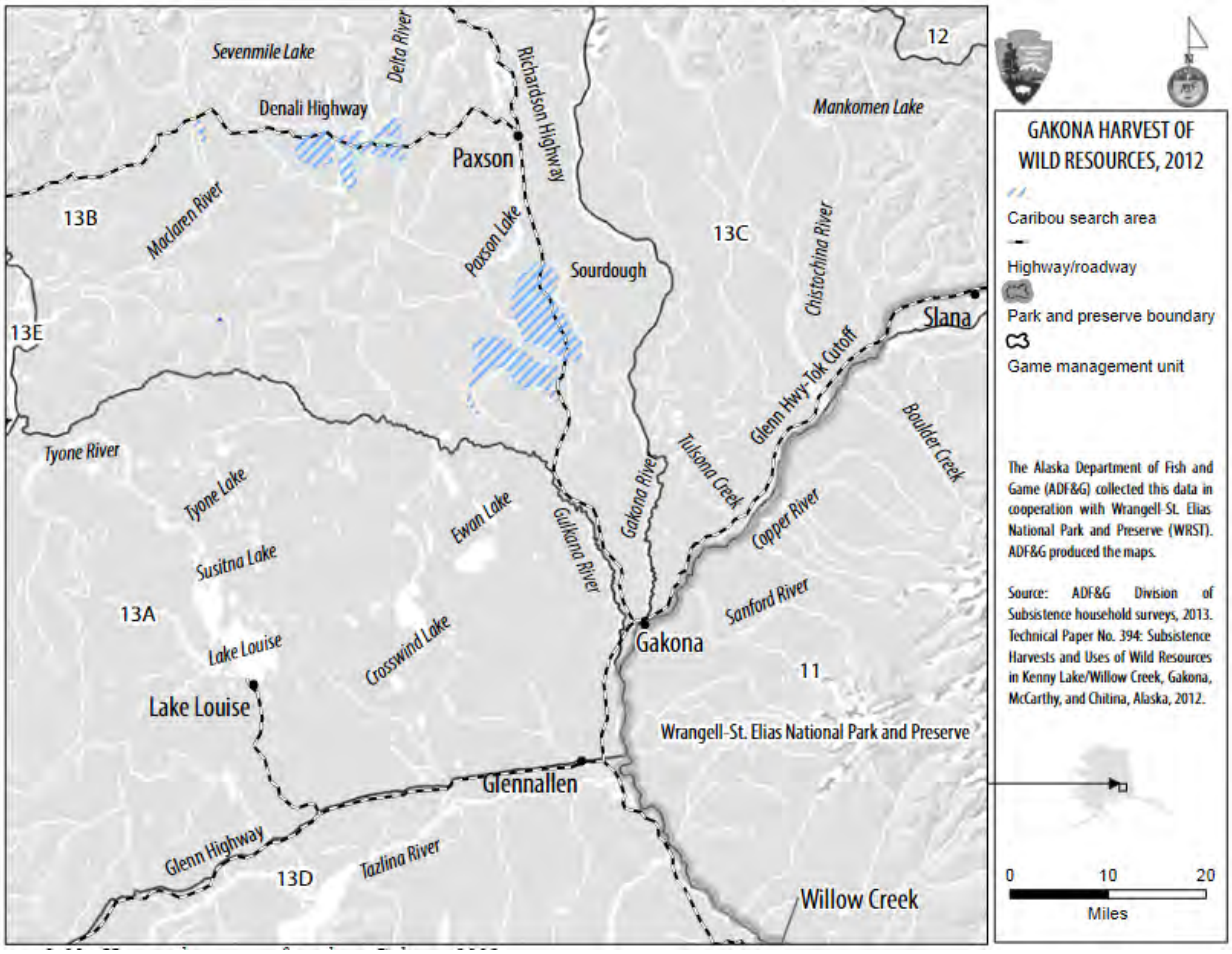

Figure 16: Gakona's documented search area for caribou, 2012 (La Vine and Zimpelman 2014).

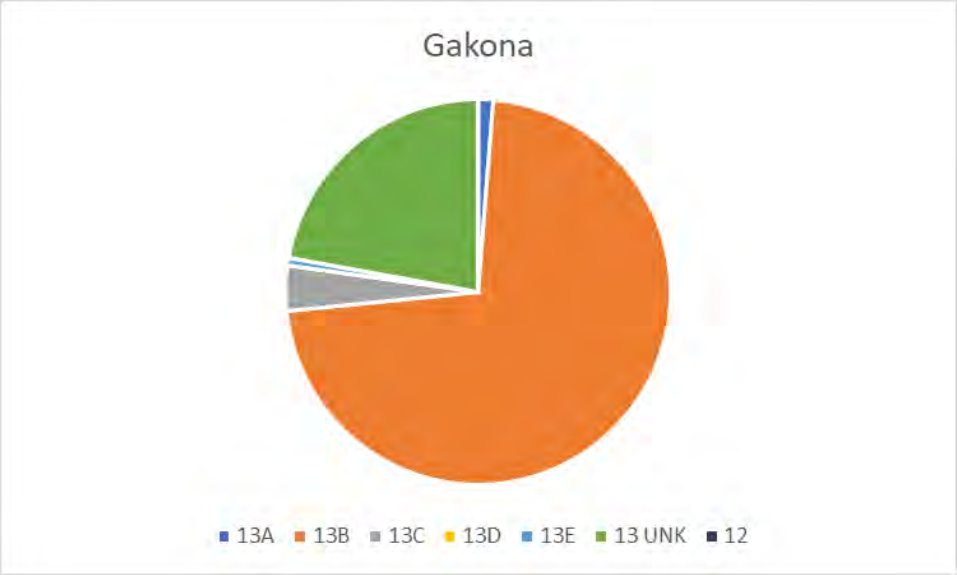

Figure 17. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Gakona's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-two percent of Gakona's harvest took place in Unit 13B, 22% in an unknown subunit of Unit 13, 4% in Unit 13C, and smaller amounts in Units 13E and 13A (Mulligan, pers. comm. 2024, OSM 2024a).

Slana/Nabesna Road

When ADF&G, Division of Subsistence conducted its most recent subsistence survey it considered Slana and the Nabesna Road area, which includes Nabesna, to be one community (La Vine et al. 2013). Slana is located in Unit 13C and Unit 11. Nabesna Road runs from Slana, across Unit 11, and into Unit 12, where Nabesna is located. The road also transects geographical and cultural boundaries: "The area along the first two-thirds of the Nabesna Road drains into the Copper River, while the last third is part of the Tanana River drainage" (Stratton and Georgette 1984: 154). Nabesna Road straddles the transition between traditional Upper Ahtna territory, around Slana, and Upper Tanana territory, around Nabesna (de Laguna and McClellan 1981, cited in Stratton and Georgette 1984).

A large Ahtna village was located at the mouth of the Slana River until the early 20th century (de Laguna and McClellan 1981, cited in Stratton and Georgette 1984). The old Ahtna villages of Batzulnetas and Suslota are also located in the area, and Ahtna have continued to use these sites for fishing and hunting (Stratton and Georgette 1984). According to Stratton and Georgette, "In addition to salmon, caribou figured prominently in the seasonal round of activities" (1984: 155). Historically, residents of this area may have depended more on "mountain caribou" than on the NCH (Simeone 2006). In the 1930s, mining activity led to improvement of the road from Nabesna to Slana and the Richardson Highway, and the Tok Road and Glenn Highway were constructed in the 1940s, opening the area to outsiders (Stratton and Georgette 1984). In 2022, Slana CDP had an estimated population of 93 and Nabesna CDP had an estimated population of 2, for a total population of 95 (ADLWD 2022).

Slana has been comprehensively surveyed by ADF&G, Division of Subsistence twice (Stratton and Georgette 1984, La Vine et al. 2013), and once by a separate entity in partnership with Division of

Subsistence (McMillan and Cuccarese 1988). However, in the two earlier studies, results for Slana and Nabesna Road/Nabesna were presented separately (Stratton and Georgette 1984, McMillan and Cuccarese 1988). In 2010, the most recent survey year, residents of Slana/Nabesna harvested an estimated 203 pounds of wild food per person (ADF&G 2024).

Sockeye Salmon was the single most important resource in terms of edible weight, followed by moose (ADF&G 2024c, **Table 31**). Caribou ranked fourth and contributed 7% of the harvest (ADF&G 2024c, **Table 31**). Division of Subsistence estimated that 12 caribou were harvested by the community, resulting in about nine pounds of food per person (ADF&G 2024c). Residents of Slana/Nabesna expressed their concern about "both moose and caribou hunts are becoming more popular with non-local hunters, which is leading to a change in traffic patterns during the hunting season and creating crowded and unsafe roads through the community" (La Vine et al. 2013). "Caribou search areas were along the Tok Cutoff from Indian River heading east to Jack Lake on the Nabesna Road, and within Game Management Unit 13B along the Denali Highway" (La Vine et al. 2013, **Figure 18**).

Between 2014 and 2022, residents of Slana/Nabesna reported 285 caribou hunts and 46 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Forty-one percent of Slana/Nabesna's harvest took place in Unit 13C, 32% in Unit 13B, and the remainder occurred in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 19**). There was one unsuccessful caribou hunt in Unit 13A (Mulligan, pers. comm. 2024).

Table 31. Top resources harvested by edible weight, Slana/Nabesna Road, 2010 (ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Sockeye Salmon	37%
2	Moose	14%
3	Coho Salmon	7%
4	Caribou	5%
5	Pacific Halibut	3%

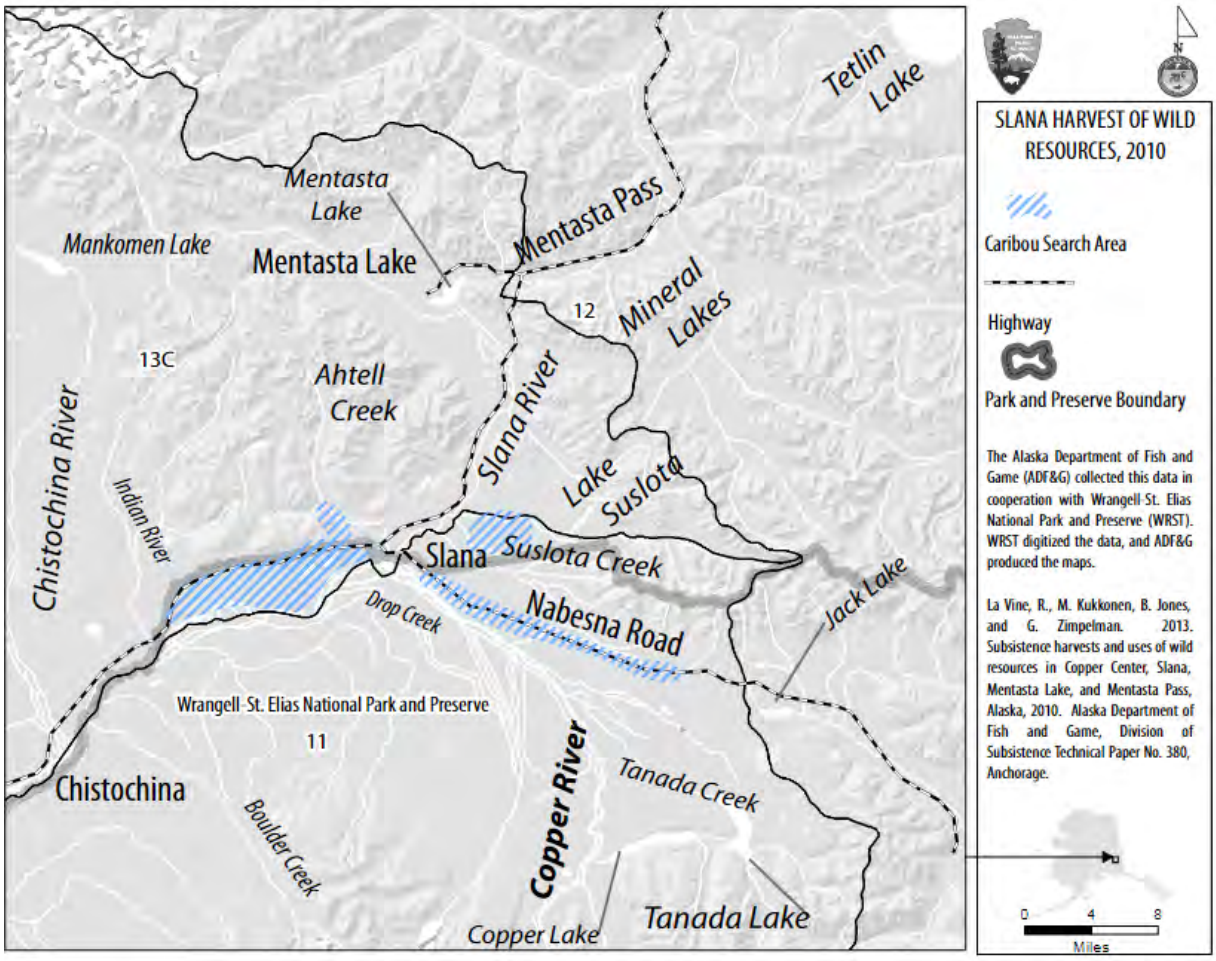

Figure 18. Slana/Nabesna Road's documented search area for caribou, 2010 (La Vine et al. 2013). Although the Figure heading indicates that the search areas represented are for "Slana," La Vine et al. (2013) indicate that this also includes Nabesna and Nabesna Rd.

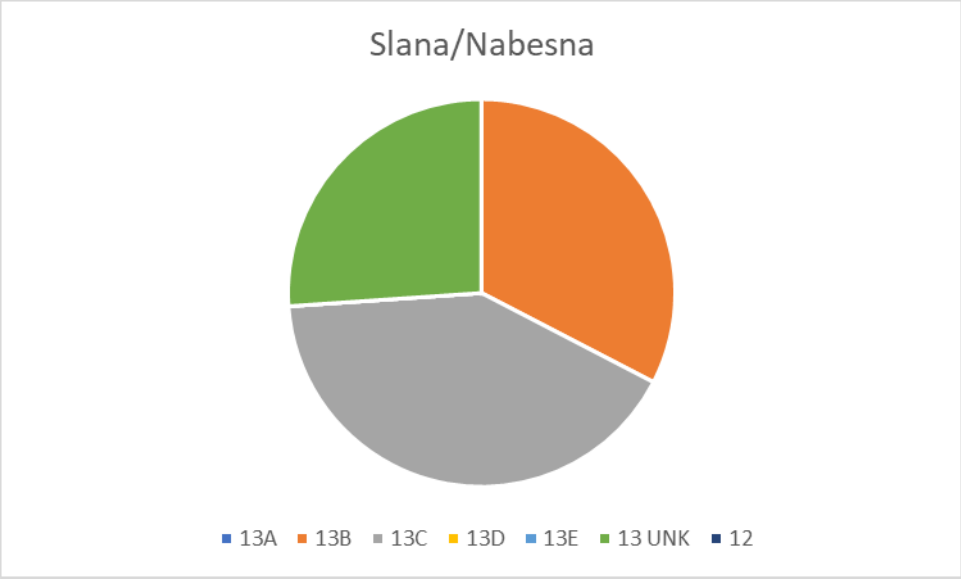

Figure 19. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Slana/Nabesna's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Forty-one percent of Slana/Nabesna's harvest took place in Unit 13C, 32% in Unit 13B, and the remainder occurred in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a).

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 and was surveyed along with Chitina in the 2012 survey effort. 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 (La Vine and Zimpelman 2014). In 2022, the estimated population of Chitina was 97 (ADLWD 2022).

Chitina has been comprehensively surveyed by ADF&G, Division of Subsistence twice (Stratton and Georgette 1984, La Vine and Zimpelman 2014), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In 2012, the most recent study year, residents of Chitina harvested an estimated 246 pounds of wild resources per person (ADF&G 2024c). Sockeye Salmon was the most important resource in terms of edible weight, followed by Chinook Salmon (ADF&G 2024c, **Table 32**). Caribou was the third most important resource and contributed 7% of the harvest (ADF&G 2024c, **Table 32**).

Table 32. Top resources harvested by edible weight, Chitina, 2012 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	46%
2	Chinook Salmon	24%
3	Caribou	7%
4	Coho Salmon	7%
5	Moose	3%

In 2012 Chitina residents harvested an estimated 19 caribou, resulting in 18 pounds of food per person, and 2 moose, resulting in 8 pounds of food per person (ADF&G 2024c). Chitina residents reported that 2012 was a poor year for harvest of caribou and other large land mammals, which they attributed to warm weather, increased hunting pressure and competition from non-locals, as well as road construction (La Vine and Zimpelman 2014).

According to La Vine and Zimpelman, "during the 2012 study year, Chitina households reported searching for caribou along McCarthy Road and Edgerton Highway. Residents of Chitina also traveled in search of caribou along the Denali Highway and Richardson Highway near Sourdough" (2014: 251). Although a map of Chitina's caribou search areas is included in La Vine and Zimpelman (2014), it does not appear to depict the entire search area.

Between 2014 and 2022, residents of Chitina reported 156 caribou hunts and 52 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Fifty-eight percent of Chitina's reported Federal and State caribou harvest took place in Unit 13B, 38% occurred in an unknown subunit of Unit 13, and smaller amounts occurred in Units 13A and 13E (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 20**). There was one unsuccessful hunt in Unit 12 (Mulligan, pers. comm. 2024).

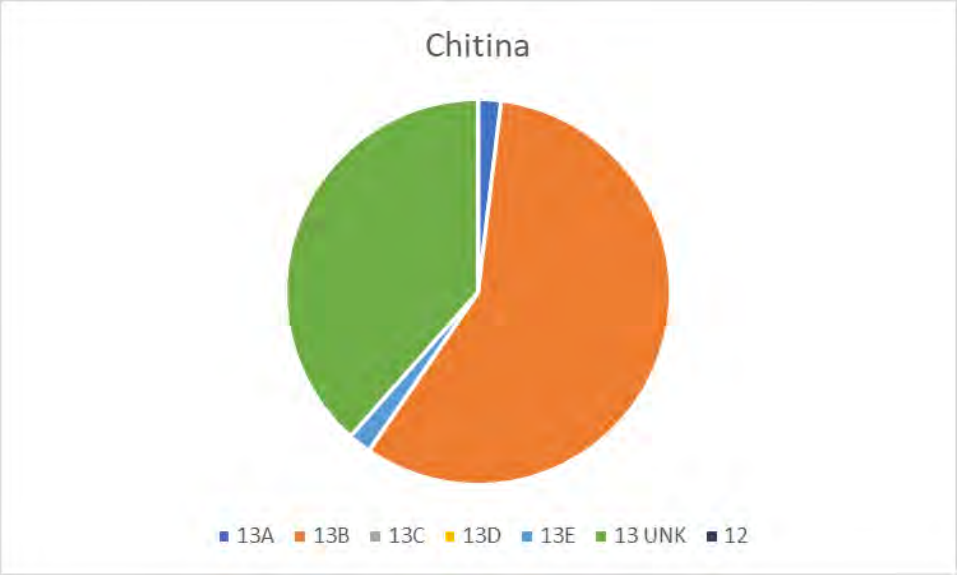

Figure 20. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Chitina's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-eight percent of Chitina's harvest took place in Unit 13B, 38% in an unknown subunit of Unit 13, and smaller amounts occurred in Units 13A and 13E (Mulligan, pers. comm. 2024, OSM 2024a).

Copper Center/Silver Springs

Copper Center is located between miles 101 and 105 of the Richardson Highway, on the west bank of the Copper River at its confluence with the Klutina River (La Vine et al. 2013). The community is defined here as including both the Copper Center and Silver Springs CDPs, following ADF&G, Division of Subsistence (La Vine et al. 2013). Copper Center falls within Unit 13D across the Copper River from Unit 11. The community is located in the Central Ahtna area, where people traditionally relied on Nelchina caribou (Simeone 2006). There were several Ahtna villages in the surrounding area, but the current settlement developed as a small trading post and grew quickly as a result of the gold rush of 1898 (Selkregg 1977 cited in Stratton and Georgette 1984). Construction of roads and the trans-Alaska pipeline brought additional settlement and economic activity (Stratton and Georgette 1984). In 2022, the estimated population of Copper Center CDP was 316 and the estimated population of Silver Springs CDP was 105, for a combined population of 421 (ADLWD 2022). Although Copper Center is one of the largest communities in the Copper River basin, Glennallen remains the regional hub, and is located about 15 miles north of Copper Center (Stratton and Georgette 1984).

Copper Center has been surveyed by ADF&G, Division of subsistence twice (Stratton and Georgette 1984, La Vine et al. 2013), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). In 2010, the most recent survey year, residents of Copper Center harvested an estimated 211 pounds of food per person (ADF&G 2024c). Sockeye Salmon was the most important resource in terms of edible weight, followed by moose (ADF&G 2024c, **Table 33**). Caribou ranked third and contributed 8% of the total harvest (ADF&G 2024c, **Table 33**). An estimated 59 caribou were harvested, resulting in 18 pounds of food per person (ADF&G 2024c).

In 2010 Copper Center residents searched for caribou primarily along roads, including "the entire Denali Highway, the Richardson Highway from Paxson to Valdez, a section of the Glenn Highway from between Lake Louise Road and Glennallen, and an area near Crosswind Lake" (La Vine et al. 2013: 50, **Figure 21**).

Between 2014 and 2022 residents of Copper Center/Silver Springs reported 1,982 caribou hunts and 488 harvests under State and Federal Opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Seventy-five percent of Copper Center/Silver Spring's harvest took place in Unit 13B, 17% in an unknown subunit of Unit 13, 5% took place in Unit 13A, and smaller amounts of harvest occurred in Units 13C, 13E, and 13D (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 22**).

Table 33. Top resources harvested by edible weight, Copper Center/Silver Springs 2010 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	53%
2	Moose	16%
3	Caribou	8%
4	Chinook Salmon	6%
5	Coho Salmon	3%

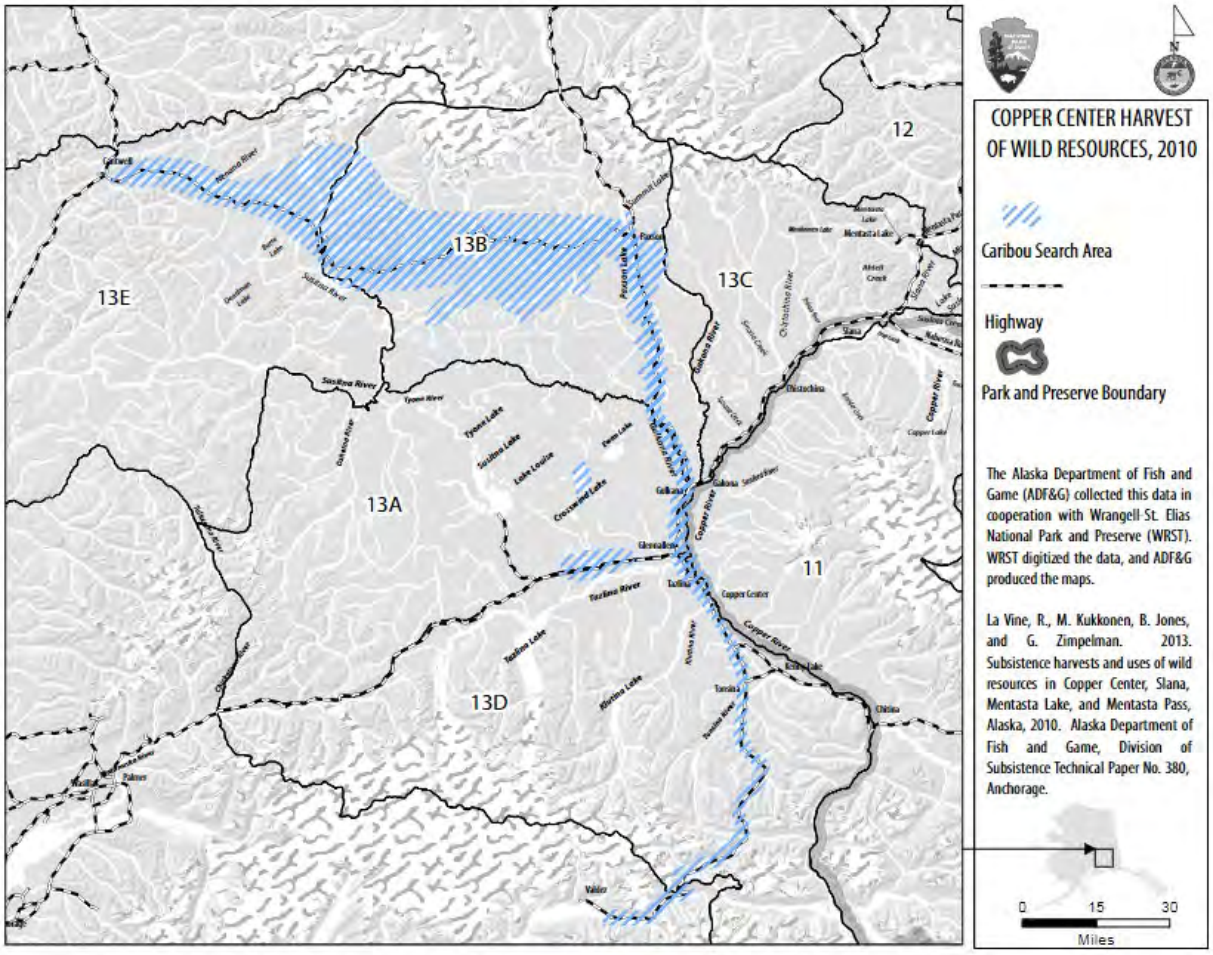

Figure 21. Copper Center/Silver Spring's documented caribou search areas, 2010 (La Vine et al. 2013).

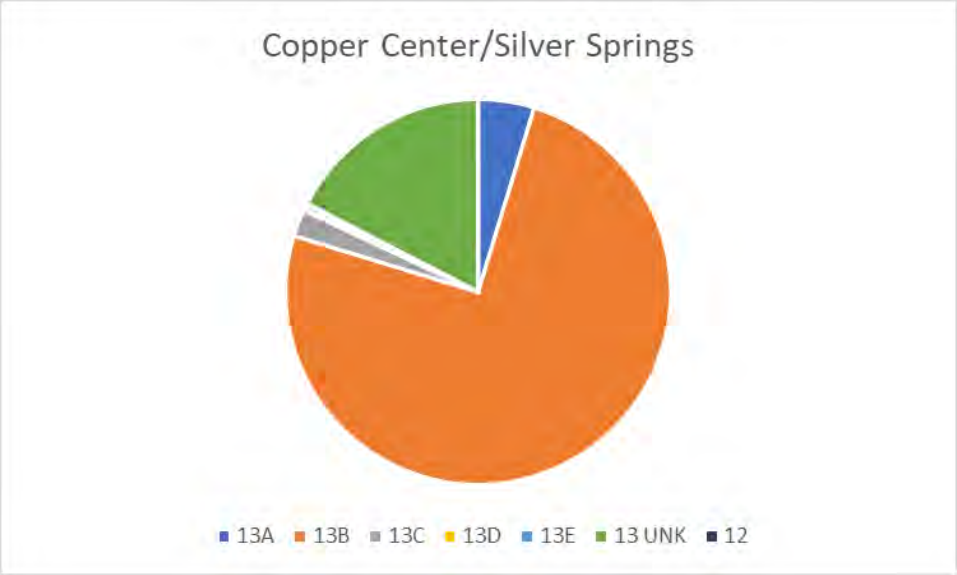

Figure 22. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Copper Center/Silver Spring's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-five percent of harvest took place in Unit 13B, 17% in an unknown subunit of Unit 13, 5% took place in Unit 13A, and smaller amounts of harvest occurred in Unit 13C and Unit 13E (Mulligan, pers. comm. 2024, OSM 2024a).

Kenny Lake and Willow Creek

Kenny Lake and Willow Creek are separate adjacent CDPs, but their subsistence uses are considered together, 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 294, and the estimated population of Willow Creek CDP was 193, for a combined population of 487 (ADLWD 2022).

Kenny Lake has been surveyed comprehensively by ADF&G, Division of subsistence twice (Stratton and Georgette 1984, La Vine and Zimpelman 2014), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). However, the way in which the community or communities have been defined, and whether this definition included the area now within Willow Creek has changed over time (Stratton and Georgette 1984, La Vine and Zimpelman 2014). The most recent survey results discussed in this section represent harvest for both the Kenny Lake and Willow Creek CDPs.

In 2012, the most recent survey year, Kenny Lake/Willow Creek residents harvested an estimated 141 pounds of wild food per person (ADF&G 2024c), and households harvested an average of ten different resources (La Vine and Zimpelman 2014). Sockeye Salmon was the most important resource, followed by moose (ADF&G 2024c, **Table 34**). Caribou was the fourth most important resource, contributing 8% of the total harvest (ADF&G 2024c, **Table 34**). Thirty-seven caribou provided about 12 pounds of food per person (ADF&G 2024c). Many surveyed residents described 2012 as a poor year for moose and caribou due to warm weather, increased hunting pressure from non-local residents, and the impacts of hunting regulations and land tenure (La Vine and Zimpelman 2014). In 2012, residents of Kenny Lake/Willow Creek hunted caribou "around Tonsina Lake, along the Richardson Highway from Gakona to Paxson, and along the Denali Highway" (La Vine and Zimpelman 2014, **Figure 23**).

Between 2014 and 2022, residents of Kenny Lake reported 554 caribou hunts and 143 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a).

Seventy-seven percent of Kenny Lake's harvest took place in Unit 13B, 20% occurred in an unknown subunit of 13, and smaller amounts of harvest occurred in Units 13A, 13C, and 13D (Mulligan, pers. comm. 2024, OSM 2024a). There was one unsuccessful hunt in Unit 13E (OSM 2024a).

Table 34. Top resources harvested by edible weight, Kenny Lake/Willow Creek 2012 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	52%
2	Moose	11%
3	Chinook Salmon	8%
4	Caribou	8%
5	Halibut	5%

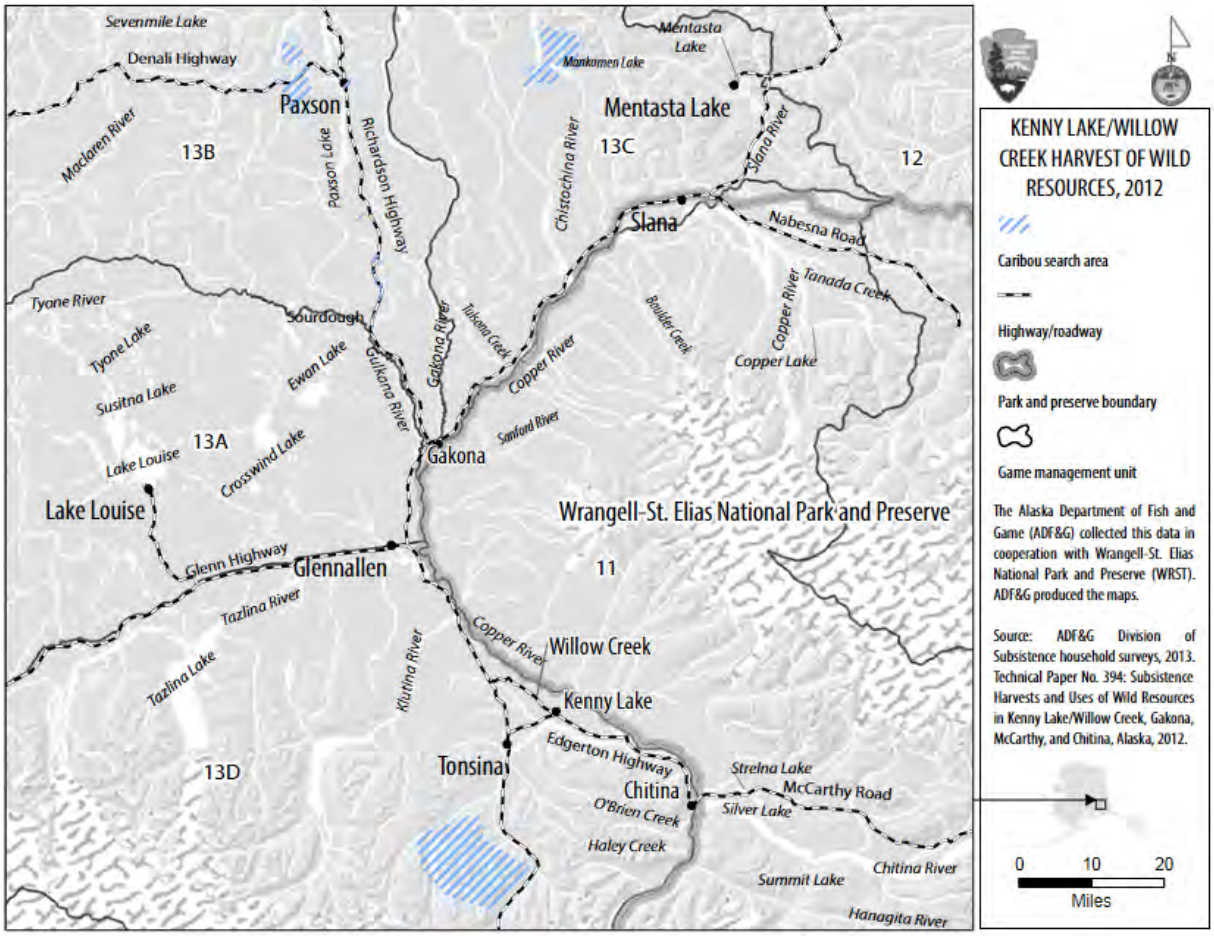

Figure 23. Kenny Lake's documented search area for caribou, 2012 (La Vine and Zimpelman 2014).

Tazlina

Tazlina is located along three miles of the Richardson Highway beginning about 5 miles south of the junction with the Glenn Highway (Holen et al. 2015). The community is within Unit 13D, close to the boundary with Unit 11. ADF&G, Division of Subsistence define Tazlina as including both Tazlina and Copperville, encompassing the subdivisions of Aspen Valley, Tazlina Terrace, and Copper Valley School Road (Holen et al. 2015). Tazlina falls within the Central Ahtna area, where residents have traditionally relied on Nelchina caribou (Simeone 2006). A traditional Ahtna summer fish camp settlement was located in the area. More recent settlement has resulted from road construction, mining, and construction of the trans-Alaska pipeline (Holen et al. 2015). By the 2020 U.S. Census, the Copperville CDP had been merged with Tazlina CDP (U.S. Census Bureau 2020). In 2022, Tazlina CDP had an estimated population of 257 (ADLWD 2022).

Tazlina has been surveyed by ADF&G, Division of subsistence twice (Stratton and Georgette 1984, Holen et al. 2015), and once by a separate entity in partnership with Division of Subsistence (McMillan and Cuccarese 1988). However, the first study grouped the Tazlina and Copperville subdivisions with Glennallen (Holen et al. 2015). In 2013, the most recent study year, Tazlina (including Copperville) was surveyed separately from Glennallen (Holen et al. 2015).

In 2013, residents of Tazlina harvested an estimated 150 pounds of wild food (ADF&G 2024c). The single most important resource was Sockeye Salmon, followed by moose (ADF&G 2024c, **Table 35**). Caribou was the fourth most important resource, contributing 4% of the total harvest (ADF&G 2024c, **Table 35**). Residents of Tazlina harvested an estimated 18 caribou in 2013, contributing seven pounds of food per person (ADF&G 2024c). **Figure 24** shows areas that Division of Subsistence documented as caribou search areas for surveyed households in 2013. Surveyed residents reported low moose and caribou harvest success in 2013; they attributed low moose success to competition with non-locals and reported that caribou were not in the right place at the right time to harvest them during the study year (Holen et al. 2015).

Between 2014 and 2022, residents of Tazlina/Copperville reported 623 caribou hunts and 144 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Seventy-two percent of Tazlina/Copperville's reported harvest occurred in Unit 13B, 20% took place in an unknown subunit of Unit 13, and smaller amounts occurred in Units 13C, 13A, and 13D (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 25**).

Table 35. Top resources harvested by edible weight, Tazlina 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	55%
2	Moose	13%
3	Chinook Salmon	8%
4/5	Caribou	4%
4/5	Coho Salmon	4%

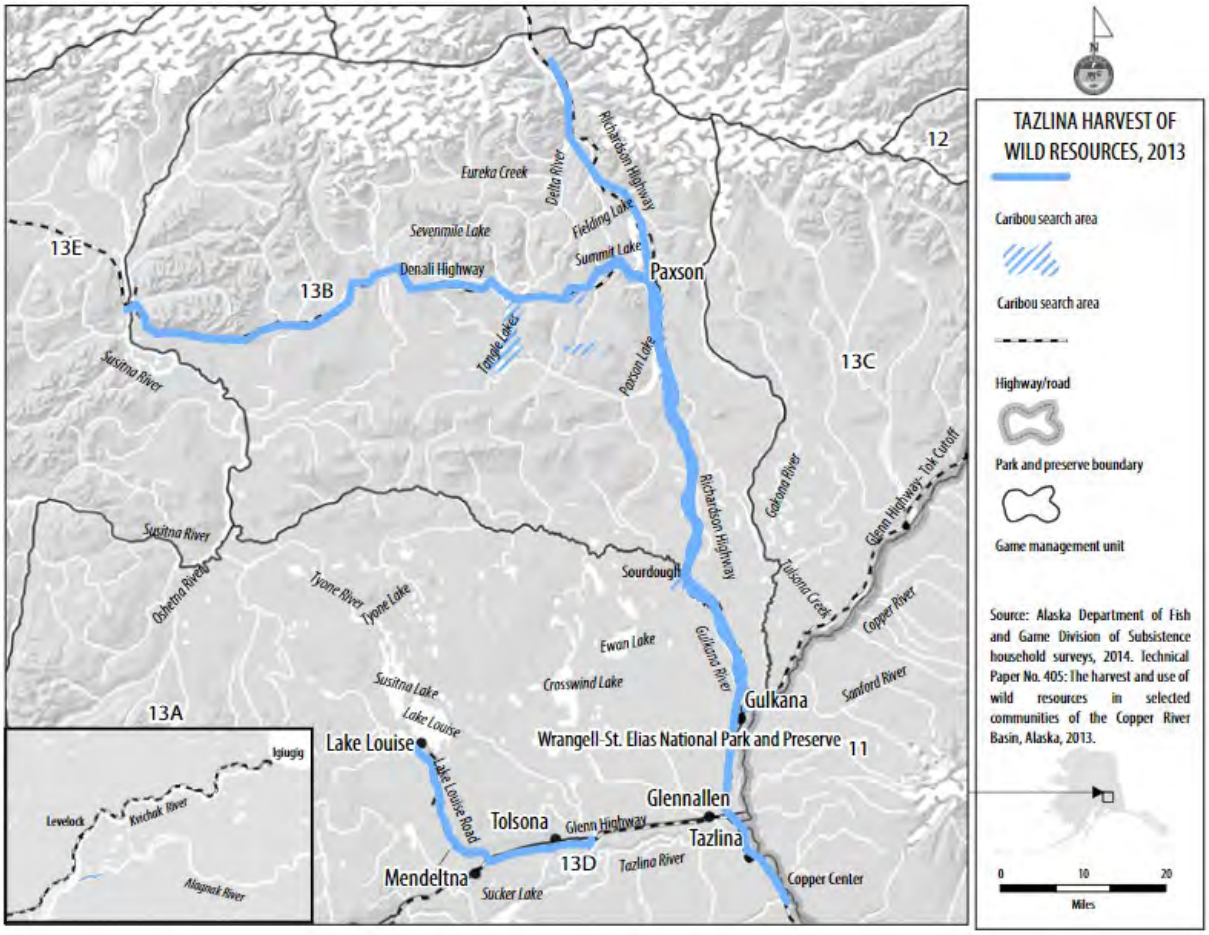

Figure 24. Tazlina's documented search area for caribou, 2013 (Holen et al. 2015).

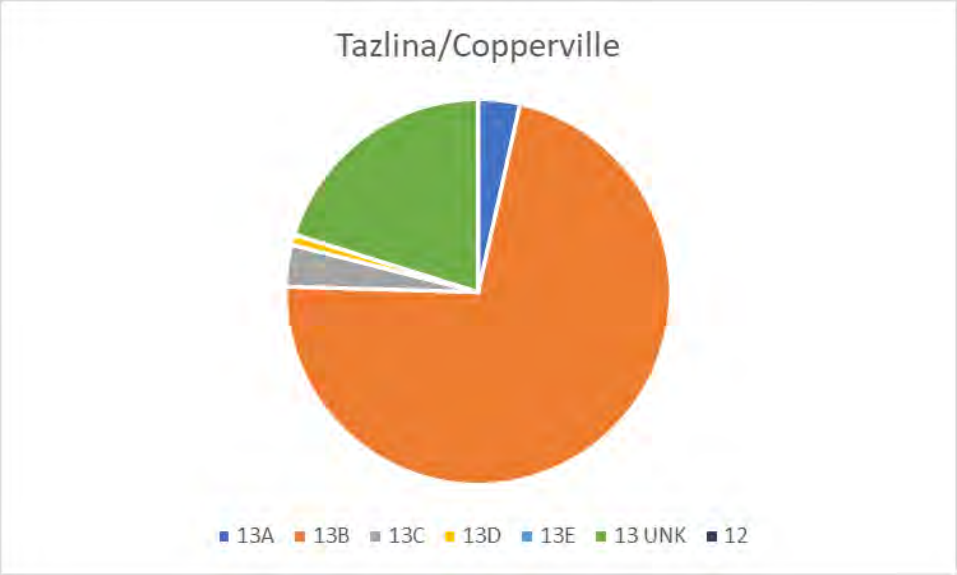

Figure 25. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Tazlina/Copperville's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-two percent of Tazlina/Copperville's harvest occurred in Unit 13B; 20% took place in an unknown subunit of Unit 13, and smaller amounts occurred in Units 13C, 13A, and 13D (Mulligan, pers. comm. 2024, OSM 2024a).

Tonsina

In 2022 the estimated population of Tonsina was 51 (ADLWD 2022). Tonsina has been the subject of three subsistence surveys (Stratton and Georgette 1984, McMillan and Cuccarese 1988, Holen et al. 2015). In 2013, the most recent survey year residents harvested an estimated 199 pounds of wild resources (ADF&G 2024c). Sockeye Salmon was the most important resource in terms of edible weight, followed by caribou, which contributed 17% of the total harvest (ADF&G 2024c, **Table 36**). An estimated 24 caribou were harvested, resulting in about 34 pounds of food per person (ADF&G 2024c).

According to Holen et al., "during the study year, Tonsina households reported searching for caribou along the Richardson Highway from Sourdough to Paxson, and along the Denali Highway as far west as Tangle Lakes" (2015: 355). All documented harvest by surveyed households in 2013 took place in Unit 13B (Holen et al. 2015, **Figure 26**).

Between 2014 and 2022, residents of Tonsina reported 41 caribou hunts and 11 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Eight harvests took place in Unit 13B and three took place in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a). There was one unsuccessful hunt in Unit 13A (OSM 2024a).

Table 36. Top resources harvested by edible weight, Tonsina, 2013 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	45%
2	Caribou	17%
3	Moose	9%
4/5	Coho Salmon	3%
4/5	Chinook Salmon	3%

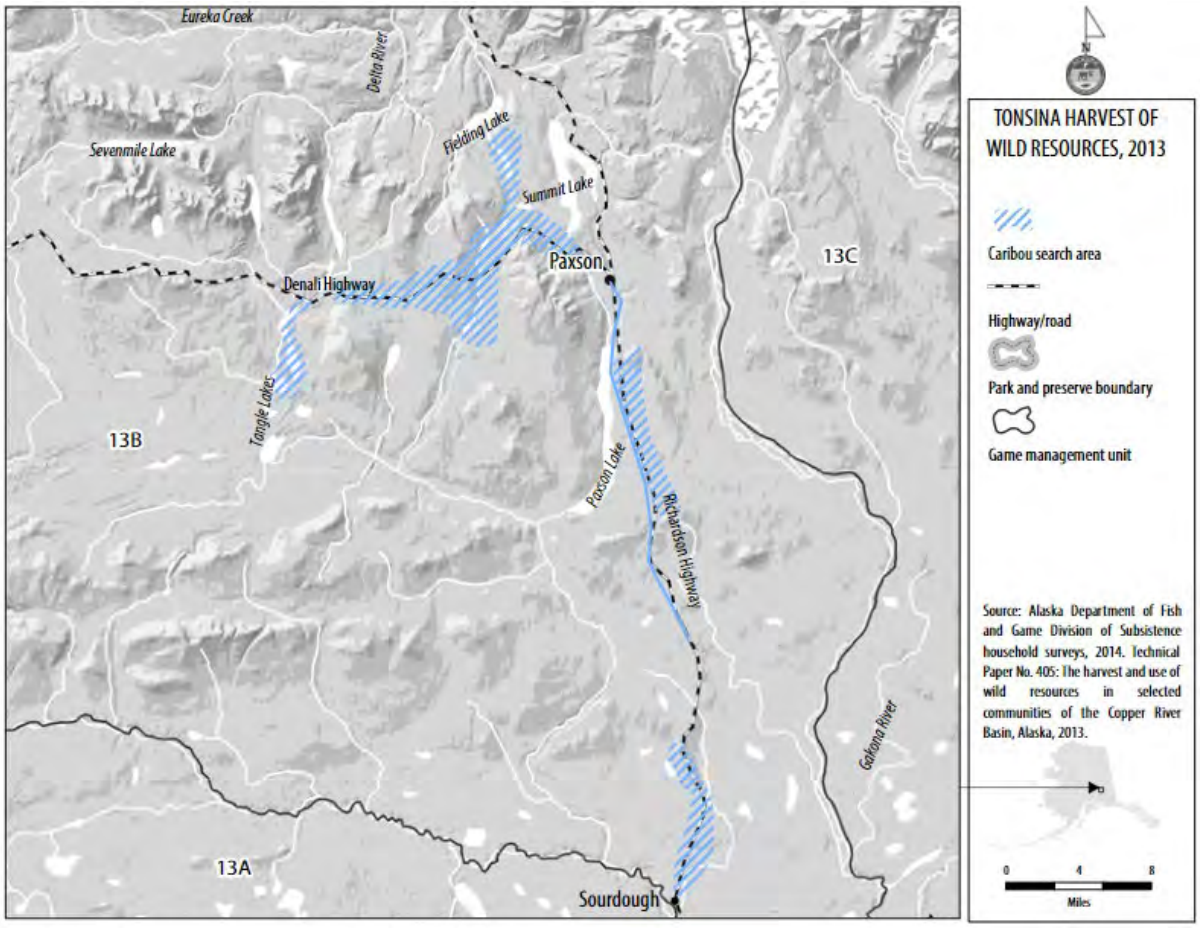

Figure 26. Tonsina's documented search areas for caribou, 2013 (Holen et al. 2015).

Cantwell

Cantwell has been the subject of three comprehensive subsistence surveys (Stratton and Georgette 1984, Simeone 2002, Holen et al. 2014). During the most recent survey year, 2012, residents of Cantwell harvested an estimated 101 pounds of wild foods per person, and households used an average of seven different resources (ADF&G 2024c, Holen et al. 2014). Moose and caribou were the top resources harvested by edible weight, with caribou contributing 13% of the total harvest (ADF&G 2024c, **Table 37**). In 2012, Division of Subsistence estimated that residents of Cantwell harvested 13 caribou, resulting in 13 pounds of food per person (ADF&G 2024c). Those residents surveyed shared

that moose and caribou had both declined in availability and were considered to be rare due to hunting pressure and competition from non-local hunters; they also stated that the resident or migratory caribou in their area are not part of the NCH and should not be governed by regulations pertaining to the NCH (Holen et al. 2014).

Cantwell's search and use areas for caribou in 2012 were within Unit 13E: "caribou were sought primarily in the vicinity of Cantwell, along the Denali Highway and Monahan Flat, and farther to the east on the Susitna River and Butte Creek" (Holen et al. 2014: 58, **Figure 27**).

Between 2014 and 2022, residents of Cantwell reported 516 caribou hunts and 157 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Eighty-eight percent of Cantwell's harvest occurred in Unit 13E, 8% in Unit 13B, and the remainder took place in an unknown subunit of Unit 13 (Mulligan, pers. comm. 2024, OSM 2024a). There were two reported unsuccessful hunts in Unit 13C and one in Unit 13A (Mulligan, pers. comm. 2024, OSM 2024a).

Table 37. Top resources harvested by edible weight, Cantwell, 2012 (ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Moose	52%
2	Caribou	13%
3	Sockeye Salmon	11%
4	Brown bear	6%
5	Blueberry	4%

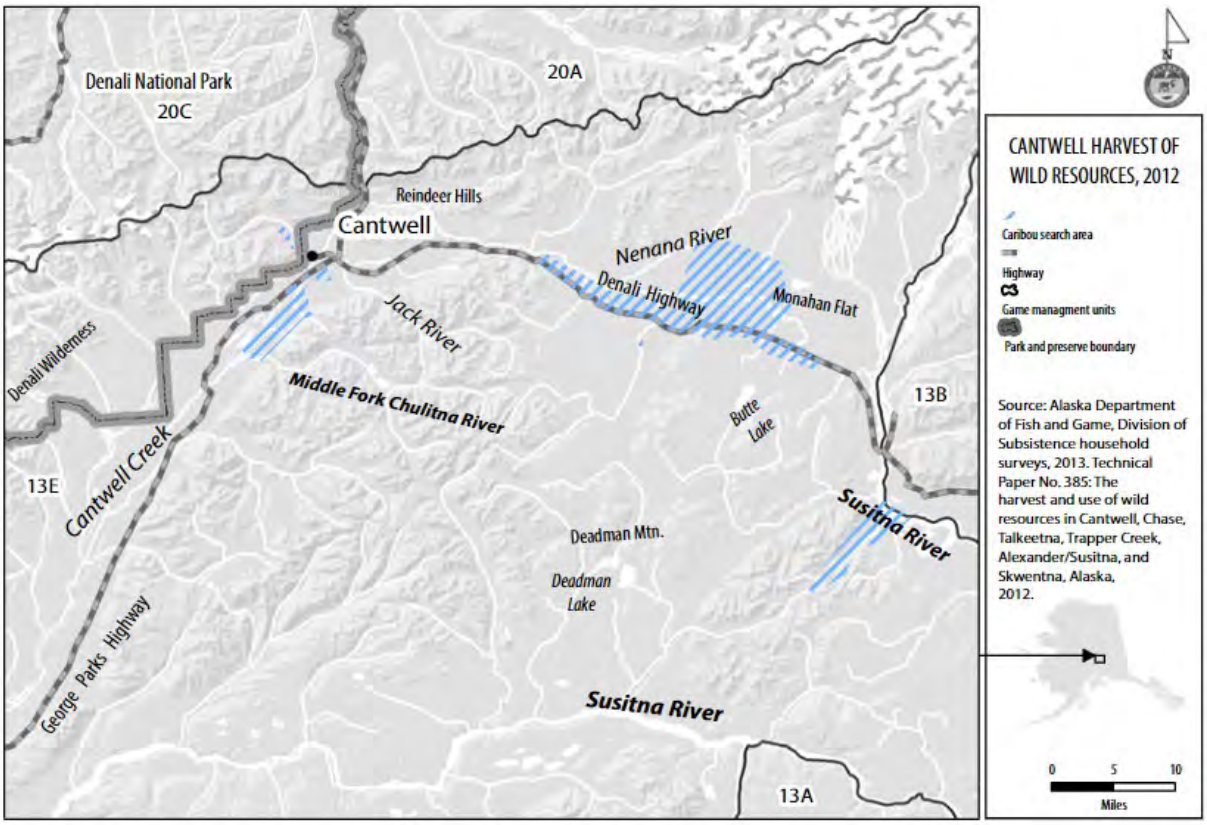

Figure 27. Cantwell's documented search areas for caribou, 2012 (Holen et al. 2014).

Kevin and Blaine Mayo and 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. The Mayo family has roots in Cantwell, but Kevin and Blaine and their households currently reside in Healy, which does not have a customary and traditional use determination for caribou in Unit 13. Healy is located approximately 39 miles north of Cantwell. The Mayo family's long-term use of Denali National Park and Preserve lands near Cantwell for subsistence hunting of caribou and other species has been documented extensively in analyses of ICTP23-01 (NPS 2023a) and ICTP23-02 (NPS 2023b). The Mayo family have hunted caribou and other species in the area since 1964 and have used their hunting camp since 1971, sharing traditions between generations (NPS 2023a, 2023b). In addition to caribou, members of the Mayo family rely heavily on moose, which provides 50% of the family's meat, and utilize grouse, ptarmigan, berries, burbot, lake trout, salmon, and other fish (NPS 2023a, 2023b). Subsistence foods typically provide sustenance for the family four days of the week (NPS 2023a, 2023b). Between 2014 and 2022, Mayo family members reported 24 caribou hunts and 3 harvests under Federal regulations in Unit 13E (OSM 2024a).

Chase

In 2022 the Unit 13E community Chase had an estimated population of 25 residents (ADLWD 2022). Chase has been the subject of two subsistence surveys (Stanek et al. 1988, Holen et al. 2014). In the

most recent survey year, 2012, residents of Chase harvested an estimated 196 pounds of wild food per person (ADF&G 2024c). Caribou was the top resource in terms of pounds of edible weight harvested, contributing 26% of the total harvest, followed by moose (ADF&G 2024c, **Table 38**). Division of Subsistence estimated that residents harvested 14 caribou, contributing about 50 pounds of food per person, indicating that residents relied heavily on caribou in 2012 (ADF&G 2024c). "Caribou were hunted and harvested along the Denali Highway from Cantwell to the Tangle lakes" (Holen et al. 2014: 104), an area that falls in Unit 13B and Unit 13E (**Figure 28**).

There was no reported Federal or State caribou harvest by residents of Chase between 2014 and 2022 (Mulligan, pers. comm. 2024, OSM 2024a). However, there were two reported unsuccessful hunts in Unit 13B during this time (OSM 2024a).

Table 38. Top resources harvested by edible weight, Chase (ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Caribou	26%
2	Moose	22%
3	Coho Salmon	10%
4	Sockeye Salmon	10%
5	Blueberries	7%

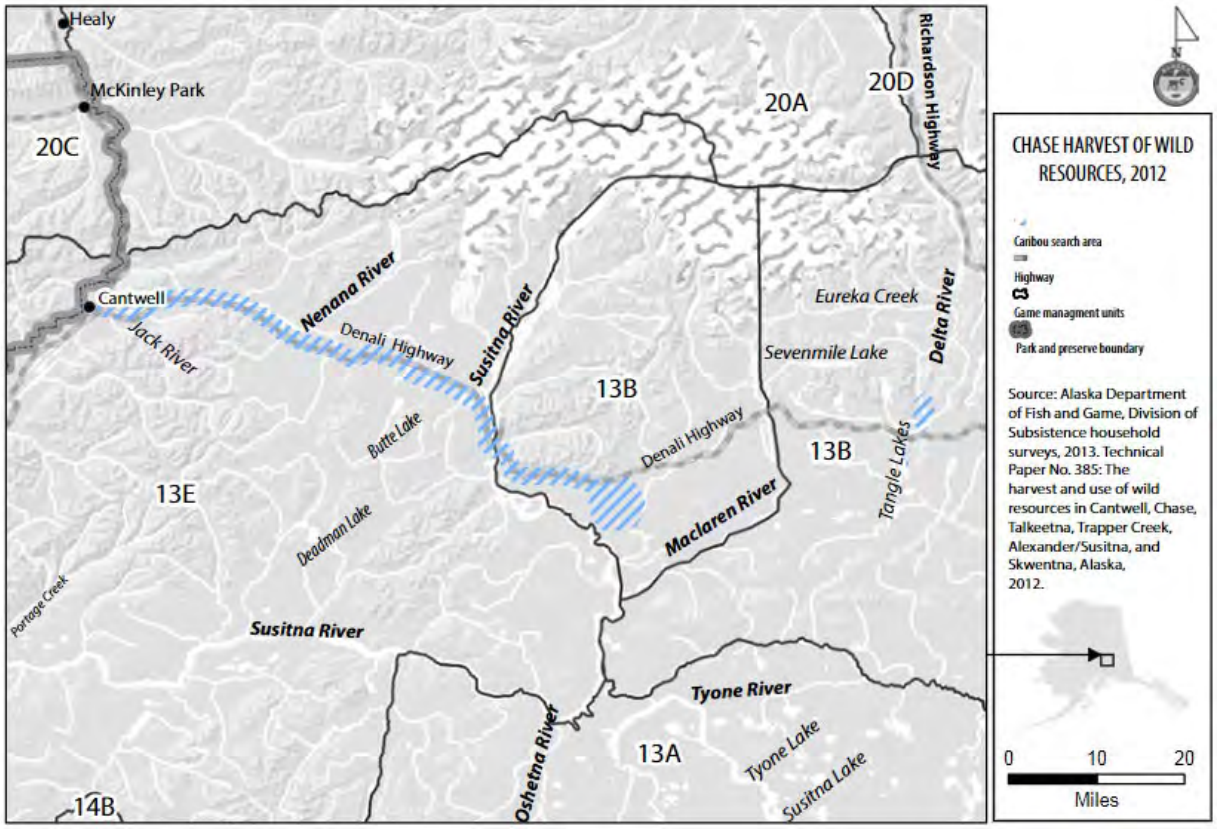

Figure 28. Chase's documented search areas for caribou, 2012 (Holen et al. 2014).

Chickaloon

Chickaloon is located approximately 32 miles northeast of Palmer along Chickaloon Branch Rd, two miles north of the Glenn Highway. Chickaloon is located within Unit 14A, near the boundary of Unit 13 to the east. Chickaloon is on the western boundary of the traditional Western Ahtna dialect area (Simeone 2006); Western Ahtna traditionally harvested Nelchina caribou (Simeone et al. 2019). The Chickaloon area was also the site of the Dena'ina village *Nuk'din'iytnu*; the name Chickaloon in fact derives from Chiklu, the last leader of the Dena'ina village, prior to abandonment in 1900 (Stratton and Georgette 1984). According to Simeone et al. 2019, "in the early the twentieth century Western Ahtna from Old Man Lake moved to…Chickaloon" (108). The present-day community originated as a railroad town in 1916 and construction of the Glenn Highway in the 1940s led to greater settlement in Chickaloon and other communities along the road (Stratton and Georgette 1984). In 2022, the estimated population of Chickaloon was 246 (ADLWD 2022). In comparison, the estimated population of Palmer was 5,936 (ADLWD 2022).

Chickaloon has been surveyed once by ADF&G, Division of Subsistence, for the June 1982 to May 1983 survey year (Stratton and Georgette 1984). During the study year residents harvested an estimated 224 pounds of wild food per person (ADF&G 2024c). Moose was the single most important resource harvested in terms of edible pounds, followed by rainbow trout (ADF&G 2024c, **Table 39**). During the 1982 to 1983 study year, surveyed Chickaloon households did not harvest any caribou, although approximately 6% of surveyed households used caribou. In contrast, the community harvested an estimated eight moose, resulting in approximately 95 pounds of food per person (ADF&G 2024c). This harvest pattern reflected the local availability of moose and lack of availability of caribou at the time (Stratton and Georgette 1984). No information about Chickaloon's documented search areas for caribou during the survey year is readily available.

Between 2014 and 2022, residents of Chickaloon reported 364 caribou harvests and 101 hunts under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Fifty-seven percent of Chickaloon's reported caribou harvest took place in Unit 13B, 21% took place in an unknown subunit of Unit 13, 16% in Unit 13A, and smaller amounts in Units 13E and 13C (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 29**).

Table 39. Top resources harvested by edible weight, Chickaloon, 1982-83 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Moose	43%
2	Rainbow trout	10%
3	Coho Salmon	9%
4	Sockeye Salmon	6%
5	Bison	5%

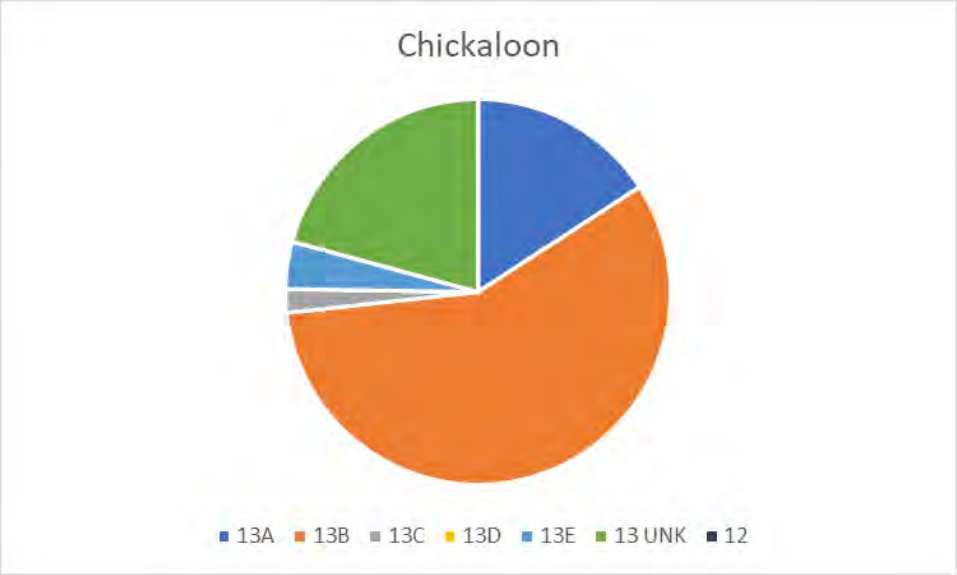

Figure 29. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Chickaloon's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-seven percent of Chickaloon's harvests occurred in Unit 13B, 21% took place in an unknown sub-unit of Unit 13, 16% in Unit 13A, and smaller amounts in Units 13E and 13C (Mulligan, pers. comm. 2024, OSM 2024a).

Denali Park CDP

In 2022, Denali Park CDP had a population of 149 residents (ADLWD 2022). The area has been the subject of two subsistence surveys, although a technical paper is only available for one (Brown and Kostick 2017). In 2015, the most recent survey year, residents of Denali Park harvested an estimated 57 pounds of wild food per person (ADF&G 2024c). Sockeye Salmon was the most important resource in terms of pounds of edible weight, followed by halibut (ADF&G 2024c, **Table 40**). Caribou ranked fourth and contributed 9% of the total harvest (ADF&G 2024c, **Table 40**). The community is estimated to have harvested seven caribou in 2015, resulting in about five pounds of food per person (ADF&G 2024c). Four households received salvaged caribou from roadkill (Brown and Kostick 2017).

In 2015 caribou were harvested both locally and at distances far away from the community: "Caribou search and harvest areas were located to the south of the community along the Parks Highway, in the Alaska Range west of Petersville, along the Denali Highway, and on Adak Island in the Aleutians" (Brown and Kostick 2017: 41). Locally, Denali Park residents searched for caribou in an area that included a portion of Unit 13E (**Figure 30**).

Between 2014 and 2022, residents of Denali Park reported 40 caribou hunts and 19 harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Thirteen of Denali Park's caribou harvest took place in Unit 13B, and 6 took place in Unit 13C (Mulligan, pers. comm. 2024, OSM 2024a).

Table 40. Top resources harvested by edible weight, Denali Park, 2015 (ADF&G 2024c).

	Resource	Percentage of Total Harvest
1	Sockeye Salmon	39%
2	Halibut	11%
3	Blueberry	10%
4	Caribou	9%
5	Low bush cranberry	8%

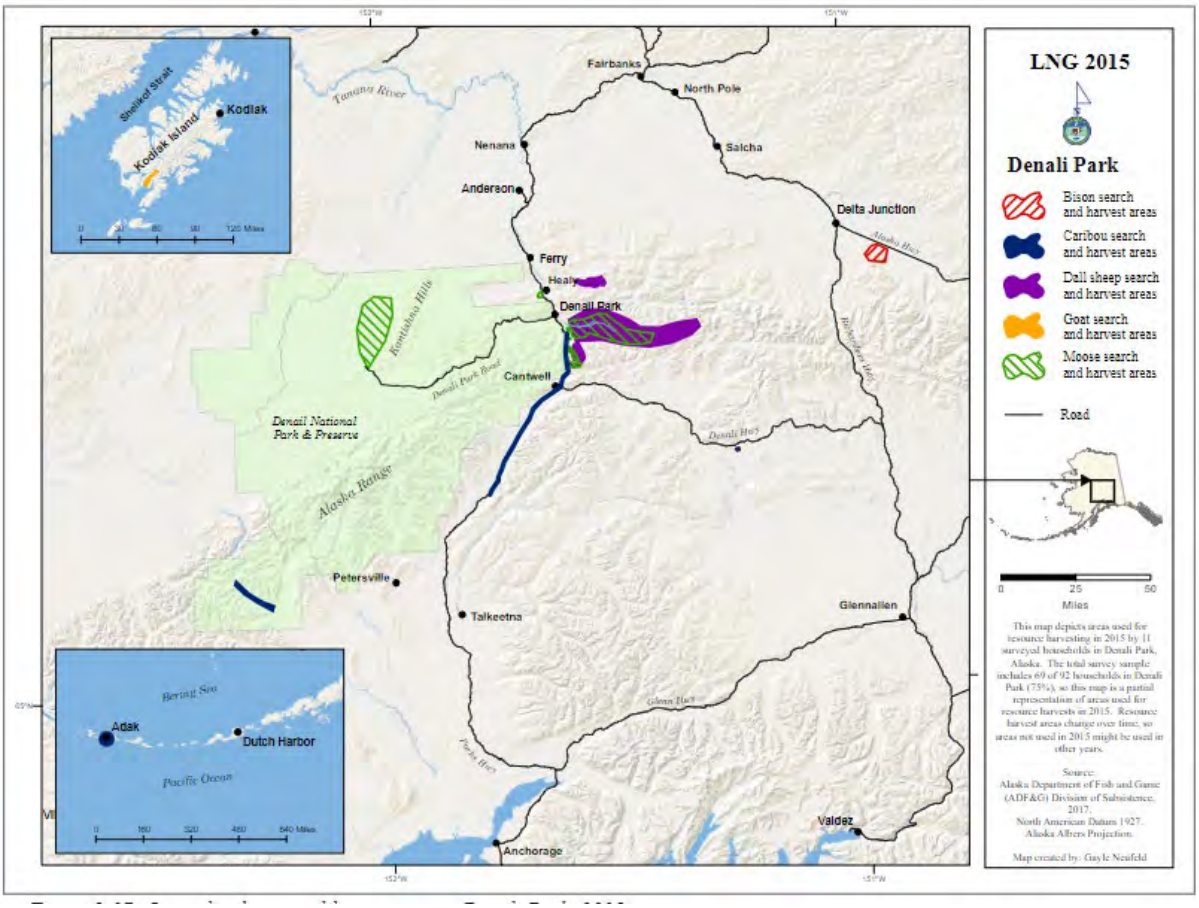

Figure 30. Denali Park's documented search area for caribou and other species, 2015 (Brown et al. 2017).

Delta Junction, Deltana, and Big Delta

Communities in Unit 20D have a customary and traditional use determination for caribou in Unit 13B. This includes the relatively large population area of Delta Junction CDP, Deltana CDP, and Big Delta CDP. In 2022, the estimated population of Delta Junction was 983, the estimated population of Big Delta was 435, and the estimated population of Deltana was 2,425, for a total population of 3,843 (ADLWD 2022). None of these communities have been surveyed by ADF&G, Division of Subsistence (ADF&G 2024c). However, harvest records show that between 2014 and 2022, residents of Delta Junction reported 5,257 caribou hunts and 1,429 harvests under State and Federal opportunities in the

proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Seventy-three percent of Delta Junction's caribou harvest took place in Unit 13B, 23% in an unknown subunit of Unit 13, and smaller amounts of harvest occurred in Units 13A and Unit 12 (Mulligan, pers. comm. 2024, OSM 2024a, **Figure 31**).

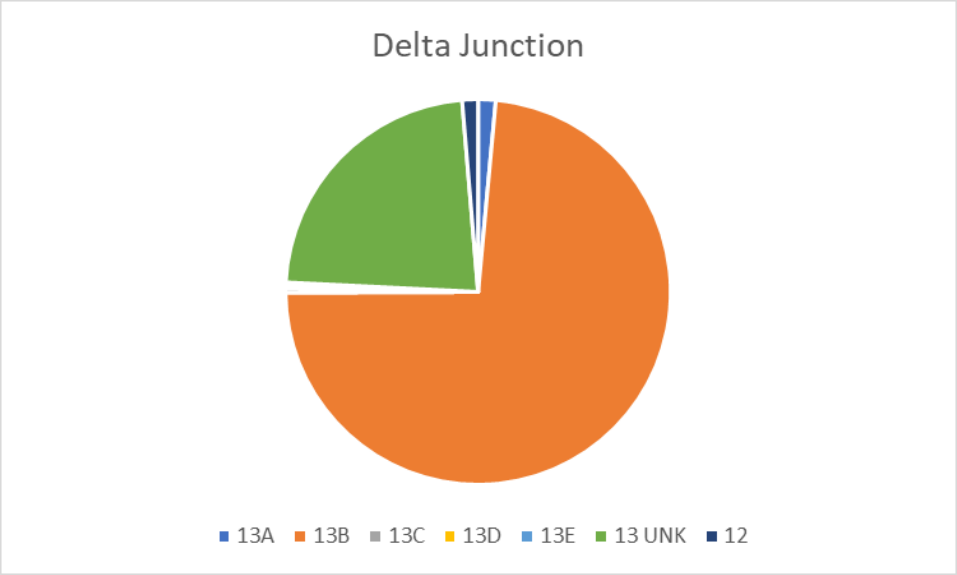

Figure 31. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Delta Junction's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-three percent of harvest took place in Unit 13B, 23% in an unknown subunit of Unit 13, and smaller amounts of harvest occurred in Units 13A and 12 (Mulligan, pers. comm. 2024, OSM 2024a).

Dot Lake

The Unit 20D community of Dot Lake is located about 47 road miles northwest of Tok, along both the Alaska Highway and the Tanana River. Dot Lake was traditionally used as a seasonal camp by the Tanacross-speaking Mansfield-Ketchumstuk band of Athabascans (Marcotte 1991, cited in Holen et al. 2012). In the 1940s Dot Lake became the site of a construction camp for the Alaska Highway, known as Sears City, and was subsequently settled by residents of Tanacross (Holen et al. 2015). Today, the community includes Dot Lake Village as well as residents along the Alaska Highway (Holen et al. 2015). In 2022, the estimated combined population of Dot Lake Village CDP and Dot Lake CDP was 48 (ADLWD 2022).

Dot Lake has been the subject of multiple subsistence surveys (Martin 1983, McMillan and Cuccarese 1988, Marcotte 1991[7], Koskey 2007, Holen et al. 2012). In 2011, the most recent survey year, residents of Dot Lake harvested an estimated 118 pounds of wild food per person (ADF&G 2024c). Moose was the most important resource, followed by Coho Salmon (ADF&G 2024c, **Table 41**). Caribou was the third most important resource in terms of pounds of edible weight harvested and accounted for 13% of the total harvest (ADF&G 2024c, **Table 41**). Division of Subsistence estimated that residents of Dot Lake harvested six caribou in 2011, resulting in about 16 pounds of food per person (ADF&G 2024c).

[7] One year of data resulted in two reports (McMillan and Cuccarese 1988, Marcotte 1991).

During the study year residents of Dot Lake primarily searched for caribou along the Taylor Highway (Holen et al. 2012, **Figure 32**). According to Holen et al., "respondents reported that in 2011 there were few moose or caribou nearby and that the restrictions on using motorized vehicles to access the nearby Macomb Plateau, prime area hunting grounds, were a hardship for the community" (2012: 445). Residents of Dot Lake felt that the Taylor Highway caribou hunts were crowded and dangerous and also avoided the Tanacross area to "avoid disputes" (Holen et al. 2012). Lack of access to moose and caribou in the Macomb Plateau Controlled Use Area is of major concern, as residents are not able to afford to access this area via float plane or pack animal (Holen et al. 2012).

Between 2014 and 2022, residents of Dot Lake reported eight caribou hunts and six harvests under State and Federal opportunities in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a). Harvest records show that all of Dot Lake's reported caribou hunts and harvests in the proposal area occurred in Unit 12, under Federal opportunity (Mulligan, pers. comm. 2024, OSM 2024a). Additionally, two unsuccessful hunts were reported in Unit 13C (OSM 2024a).

Table 41. Top resources harvested by edible weight, Dot Lake, 2011 (Holen et al. 2012, ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Moose	28%
2	Coho Salmon	17%
3	Caribou	13%
4	Sockeye Salmon	11%
5	Pink salmon	9%

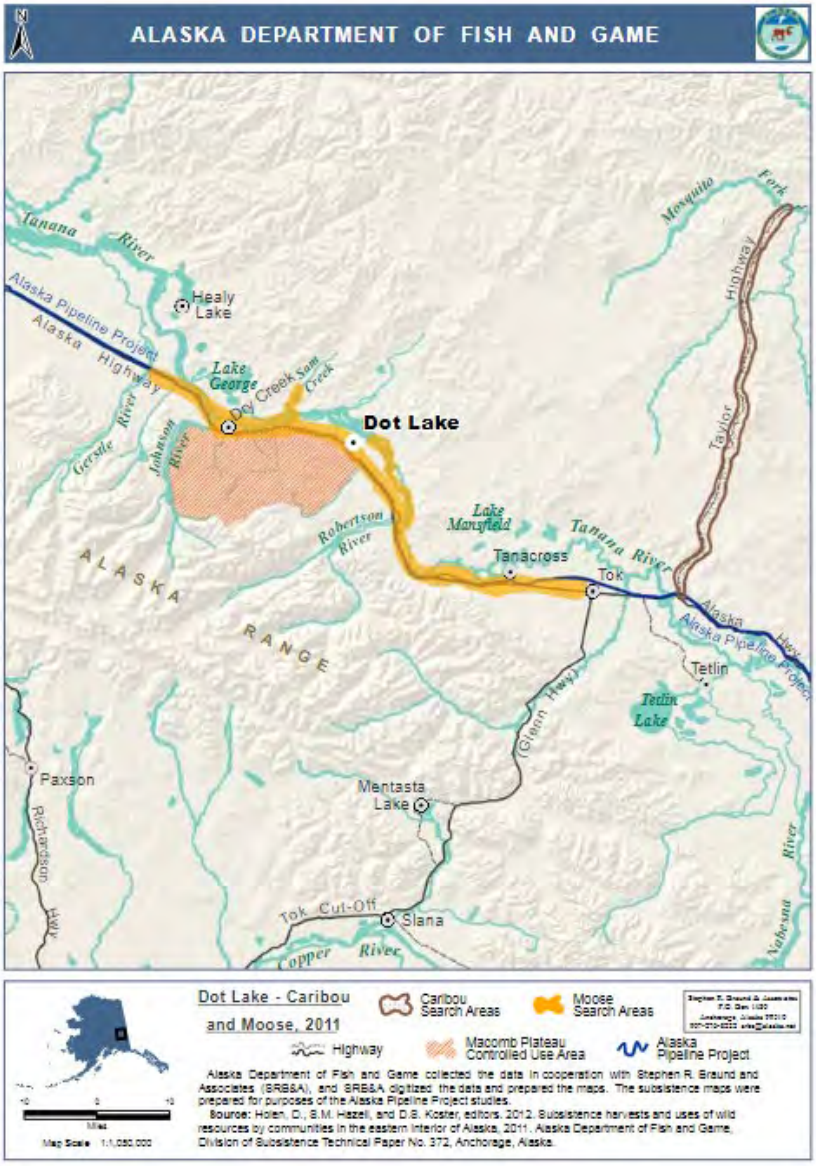

Figure 32. Dot Lake's documented search areas for caribou, 2011 (Holen et al. 2012).

Dry Creek

The Unit 20D community of Dry Creek has been surveyed once by ADF&G, Division of Subsistence (Holen et al. 2012). In 2011, the most recent survey year, residents of Dry Creek harvested an estimated 140 pounds of wild foods (ADF&G 2024c). Moose was the most important resource in terms of edible weight, followed by Sockeye Salmon (ADF&G 2024c, **Table 42**). Caribou was the third most important resource, contributing 10% of the total harvest (ADF&G 2024c, **Table 42**). Division of Subsistence estimated that residents of Dry Creek harvested an estimated ten caribou, resulting in about 14 pounds of food per person (ADF&G 2024c).

According to Holen et al., "Moose is the dominant resource for this community, and although Dry Creek raises its own cows and pigs, the meat harvested from their domestic animals provides only a

small amount of variety to a diet that relies heavily on wild game" (2012: 510). Dry Creek's search area for large land mammals centers around the Macomb Plateau controlled use area, where they must use pack horses to access and haul meat (Holen et al. 2012). **Figure 33** shows Dry Creek's search area for caribou in 2013; all mapped harvest occurred in Unit 20D. There were no reported State or Federal caribou hunts or harvests for residents of Dry Creek in the proposal area between 2014 and 2022 (Mulligan, pers. comm. 2024, OSM 2024a).

Table 42. Top resources harvested by edible weight, Dry Creek, 2011 (ADF&G 2024c).

Rank	Resource	Percentage of Total Harvest
1	Moose	66%
2	Sockeye Salmon	12%
3	Caribou	10%
4	Low bush cranberry	6%
5	Rainbow trout	1%

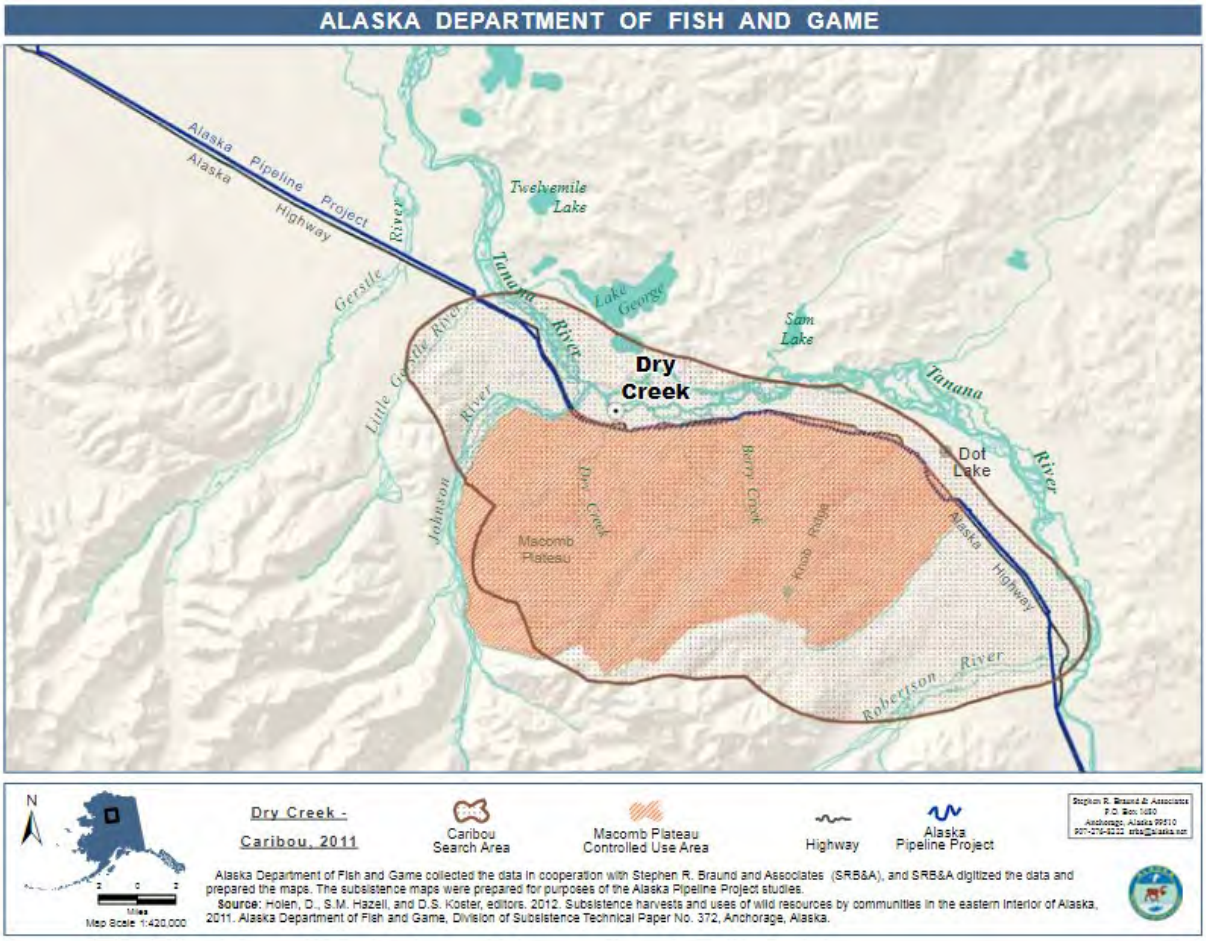

Figure 33. Dry Creek's documented search area for caribou, 2011 (Holen et al. 2012).

Healy Lake

The Tanacross Athabascan community of Healy Lake is located on the lake shore north of the Alaska Highway, about 29 miles east of Delta Junction (Haynes and Simeone 2007). A site near the current village demonstrates human habitation in the area for over 10,000 years (Haynes and Simeone 2007). In the early 1940s an epidemic destroyed much of the population and survivors moved the Little Gerstle River, Dot Lake, and Tanacross, but families eventually returned (Haynes and Simeone 2007). In 2022 the Healy Lake CDP had an estimated 22 residents (ADLWD 2022).

Healy Lake was surveyed by ADF&G, Division of Subsistence for the 2011 study year (Holen et al. 2012)[8]. During the study year, residents harvested an estimated 229 pounds of wild food per person and households used an average of 16 different resources (Holen et al. 2012). Moose was the single most important resource, followed by caribou, which contributed 23% of the total harvest (Holen et al. 2012, **Table 43**). During the study year residents of Healy Lake harvested an estimated three caribou which resulted in about 52 pounds of food per person (Holen et al. 2012). During the same year residents of Healy Lake harvested caribou "near the community and to the northeast past the headwaters of the Volkmar River" (Holen et al. 2012: 420, **Figure 34**). Between 2014 and 2022 there were no reported State or Federal caribou hunts or harvests by residents of Healy Lake in the proposal area (Mulligan, pers. comm. 2024, OSM 2024a).

Table 43. Top resources harvested by edible weight, Healy Lake, 2011 (Holen et al. 2012).

Rank	Resource	Percentage of Total Harvest
1	Moose	47%
2	Caribou	23%
3	Unknown whitefishes	14%
4	Burbot	11%
5	Highbush cranberry	2%

[8] Results of the 2011 survey year for Healy Lake are not included in the Community Subsistence Information System and are taken directly from the original technical paper (Holen et al. 2012).

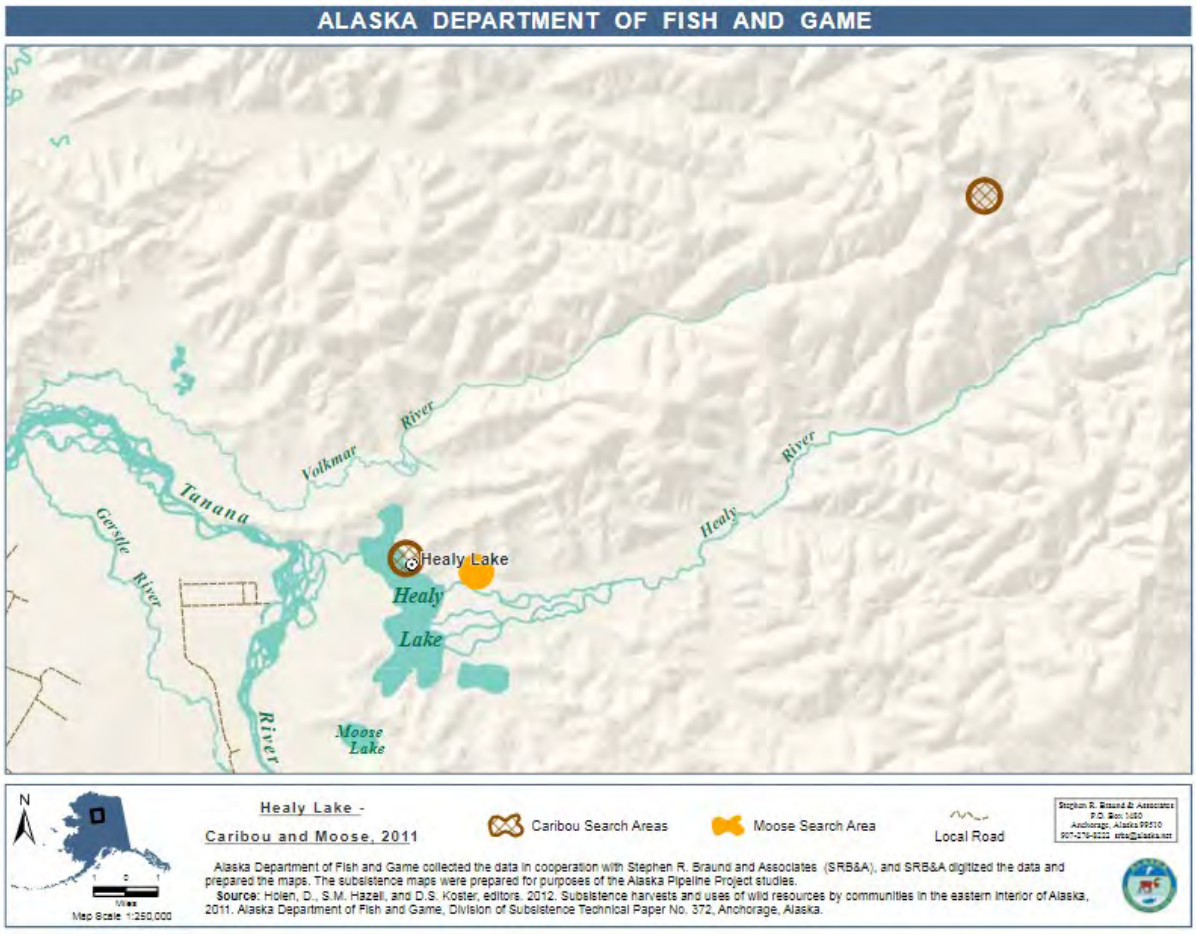

Figure 34. Healy Lake's documented search areas for caribou (and moose), 2011 (Holen et al. 2012).

Local Residency

Criterion 2 of §804 analyses is local residency. This section considers local residency on the basis of each hunt unit. Currently, Unit 13 is divided into two Federal hunt areas: Unit 13A/13B and Unit 13 remainder (which includes Unit 13C, 13D, and 13E). In contrast, for the purpose of customary and traditional use determinations, Unit 13 is split into four areas: Unit 13A/13D, 13B, 13C, and 13E. For this reason, local residency is considered separately for each subunit of Unit 13. There is one Federal caribou hunt area in Unit 11, corresponding with the Unit itself. However, there are two customary and traditional use determination areas contained in Unit 11: (1) "Unit 11, north of the Sanford River" and (2) "Unit 11, remainder." There is a single customary and traditional use determination for Unit 12, although the Unit is divided into three different areas for the purposes of harvest regulations. Only the Unit 12 remainder area is included in this analysis.

Units 13A and 13D

Residents of Units 11, 12 (along the Nabesna Road), 13, and Chickaloon have a customary and traditional use determination to harvest for caribou in Unit 13A and 13D (**Figure 35**). There are few Federal lands in either Unit 13A or Unit 13D.

Considering first the Unit 13A section of this area, the communities of Glennallen, Tolsona, Mendeltna, Nelchina, Lake Louise, Sheep Mountain, and Glacier View are located within the area or on the boundary of the area with Unit 13D. Gakona, Gulkana, Tazlina, and Chickaloon are also located on the boundary of, or near Unit 13A. Copper Center/Silver Springs, Kenny Lake/Willow Creek, Tonsina, Chitina, and Paxson are also located in reasonable proximity to Unit 13A.

Next, considering Unit 13D, the communities of Chitina, Copper Center/Silver Springs, Kenny Lake/Willow Creek, Tazlina, and Tonsina are located in the subunit. Glacier View, Sheep Mountain, Mendeltna, Tolsona, and Glennallen are located on the boundary between Unit 13A and 13D. Gulkana, Gakona, and Chickaloon are also located in close proximity to Unit 13D. Additionally, Unit 13D is the closest Federal hunt area other than Unit 11 for McCarthy.

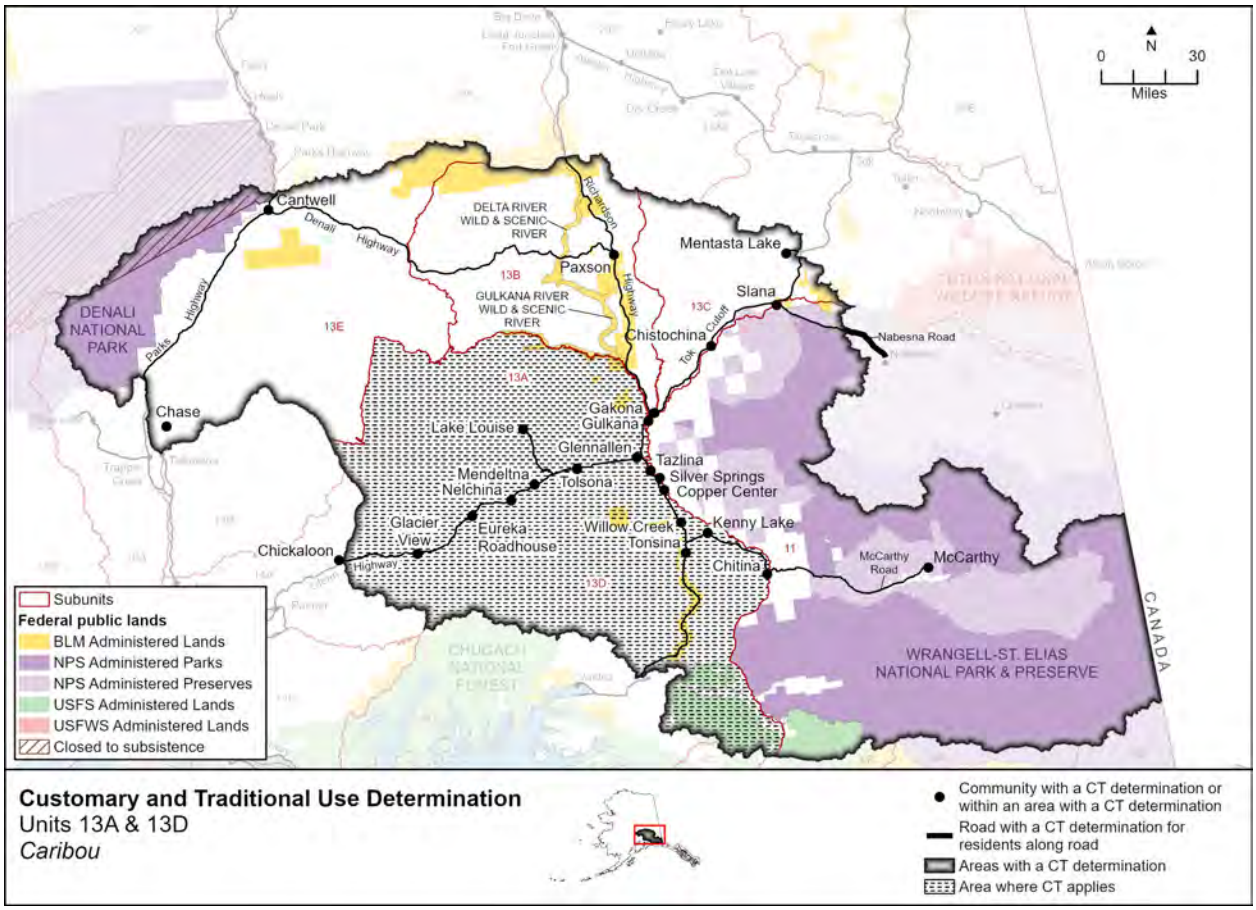

Figure 35. Communities and areas with a customary and traditional use determination for Units 13A and 13D.

Unit 13B

For most of the communities in the analysis, Unit 13B is the most important area for harvesting caribou from the NCH (Mulligan, pers. comm. 2024, OSM 2024a). There are some Federal lands in Unit 13B. 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 (**Figure 36**). Of these, the communities of Paxson and Gulkana are located within 13B, while Gakona is located both in Unit 13B and 13C. Glennallen, Tazlina, and Copper Center/Silver Springs, Tolsona, Chistochina, and Kenny Lake/Willow Creek, Tonsina, Mendeltna, Nelchina, and Slana are also in reasonable proximity to Unit 13B.

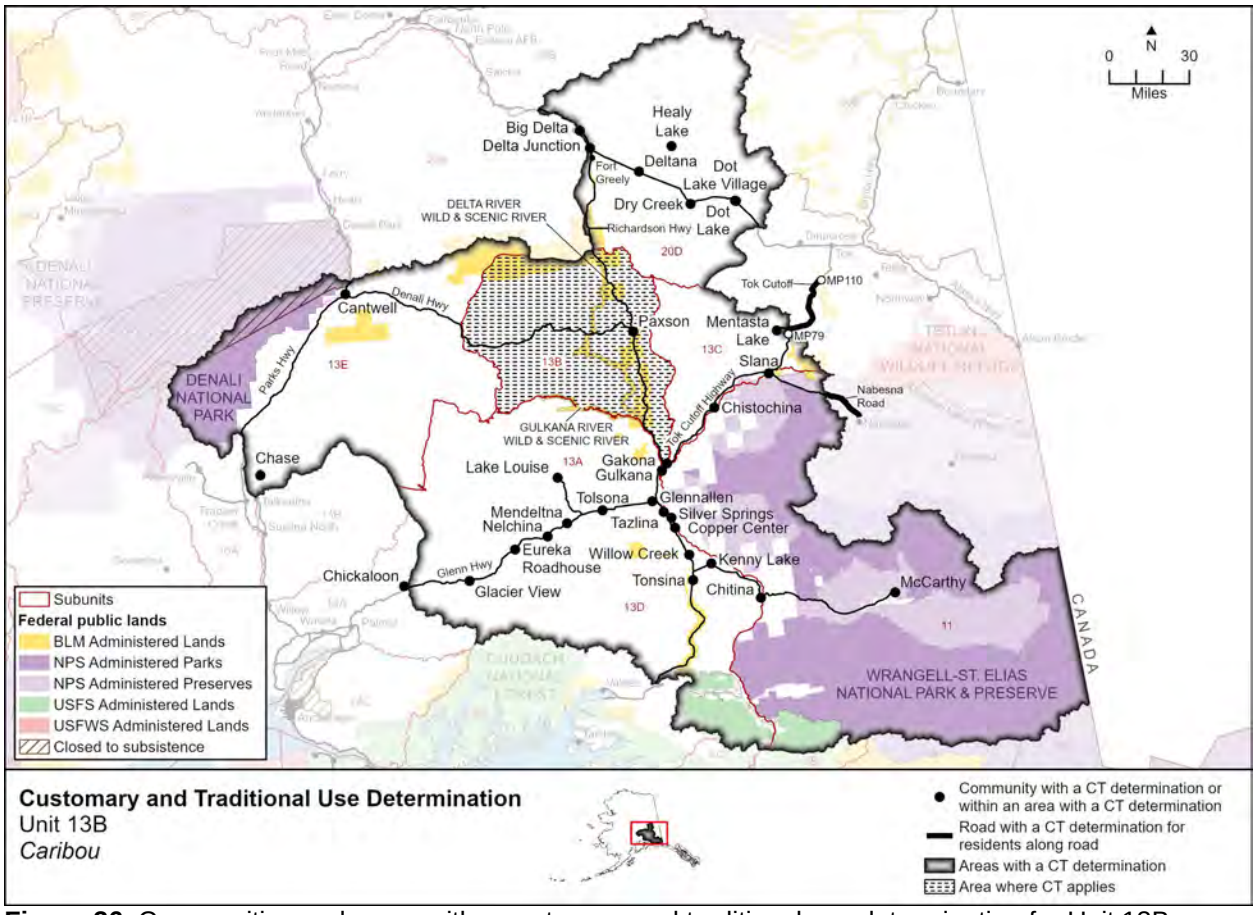

Figure 36. Communities and areas with a customary and traditional use determination for Unit 13B.

Unit 13C

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 to harvest caribou in Unit 13C (**Figure 37**). Mentasta Lake, a portion of Gakona, Chistochina, and a portion of Slana are located within Unit 13C. Gulkana is located immediately to the west of the boundary of Unit 13C with Unit 13B. Mentasta Pass is located near the boundary between Unit 13C and Unit 12. Nabesna Rd. reaches from the Unit 13C boundary through Unit 11 and into Unit 12. Glennallen, Tazlina, Copper Center/Silver Springs, and Tolsona are all located in reasonable proximity to Unit 13C.

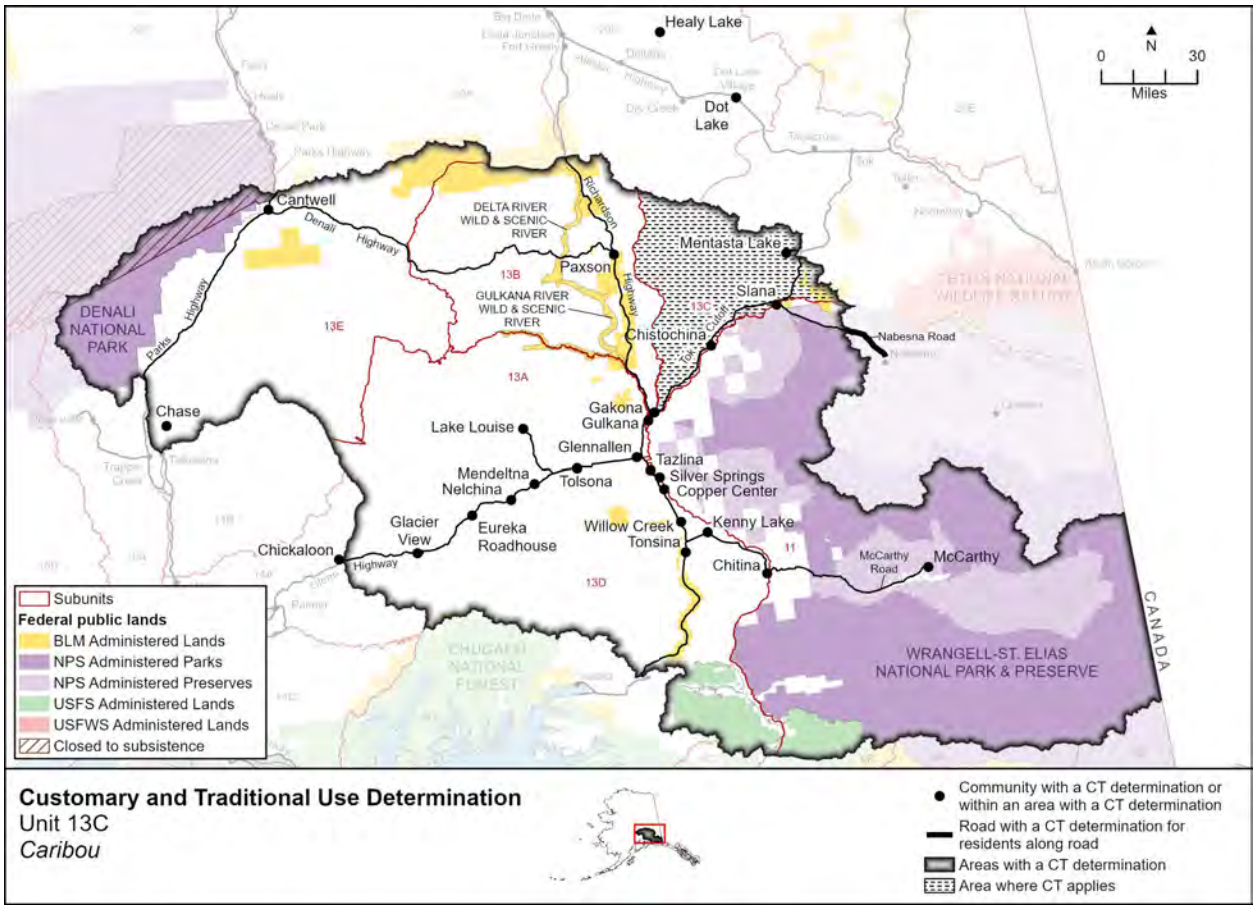

Figure 37. Communities and areas with a customary and traditional use determination for Unit 13C.

Unit 13E

Residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village (now known as Denali Park Village), and the area along the Parks Highway between mileposts 216-239 (excluding the residents of Denali National Park Headquarters) have a customary and traditional use determination to harvest caribou in Unit 13E (**Figure 38**). Cantwell and Chase are located in Unit 13E. The portion of the Parks Highway area with a customary and traditional use determination, as well as Denali Park Village are also located close to Unit 13E.

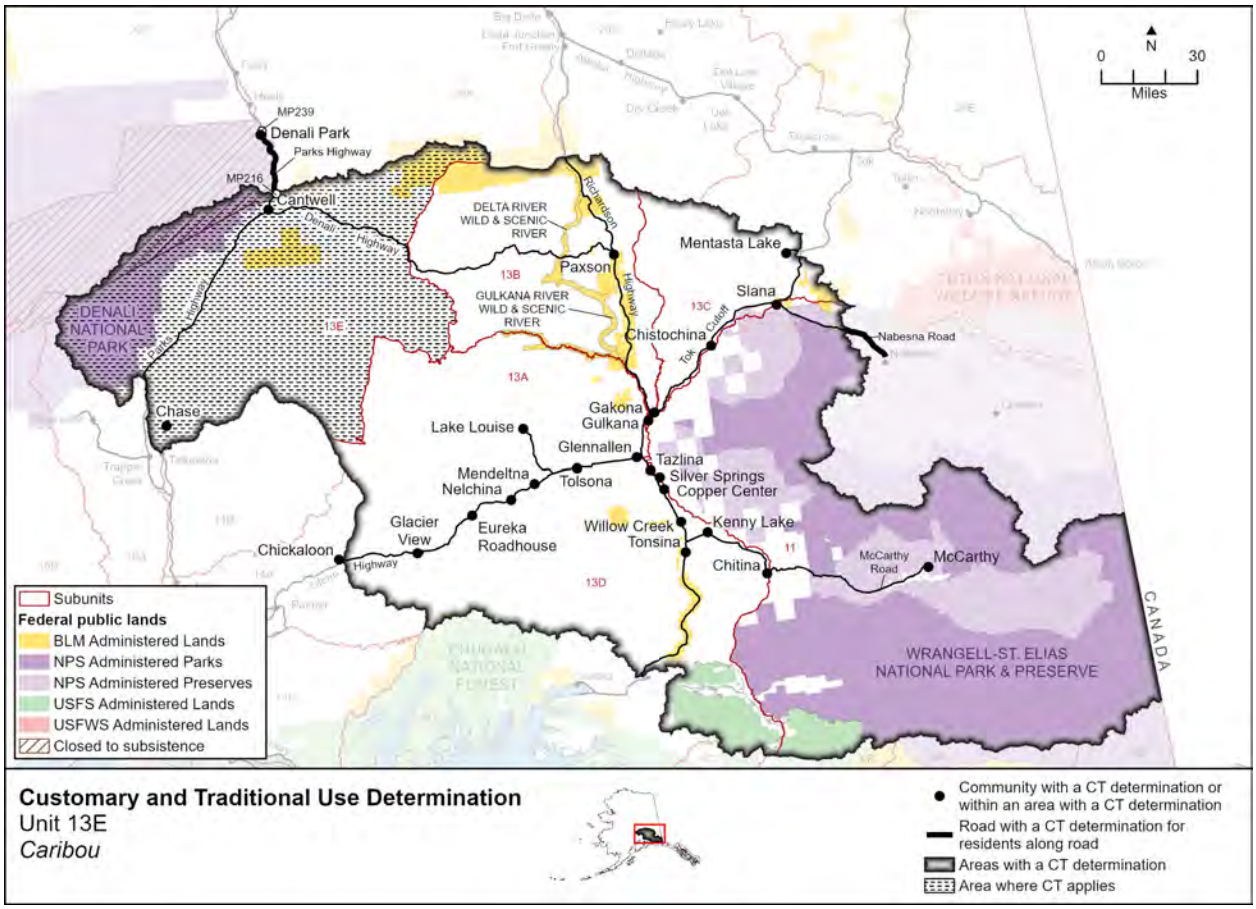

Figure 38. Communities and areas with a customary and traditional use determination for Unit 13E.

Unit 11, North of the Sanford River

Residents of Units 11, 12, 13A–D, Chickaloon, Healy Lake, and Dot Lake have a customary and traditional use determination for caribou in Unit 11 north of the Sanford River (**Figure 39**). Of these, only a portion of Nabesna Road is located fully within Unit 11, North of the Sanford River, although Slana and Chistochina are located on the boundary of the area with Unit 13C. Nabesna, Gakona, Gulkana, Glennallen, and Mentasta Lake are also located in reasonable proximity to the boundary of this area.

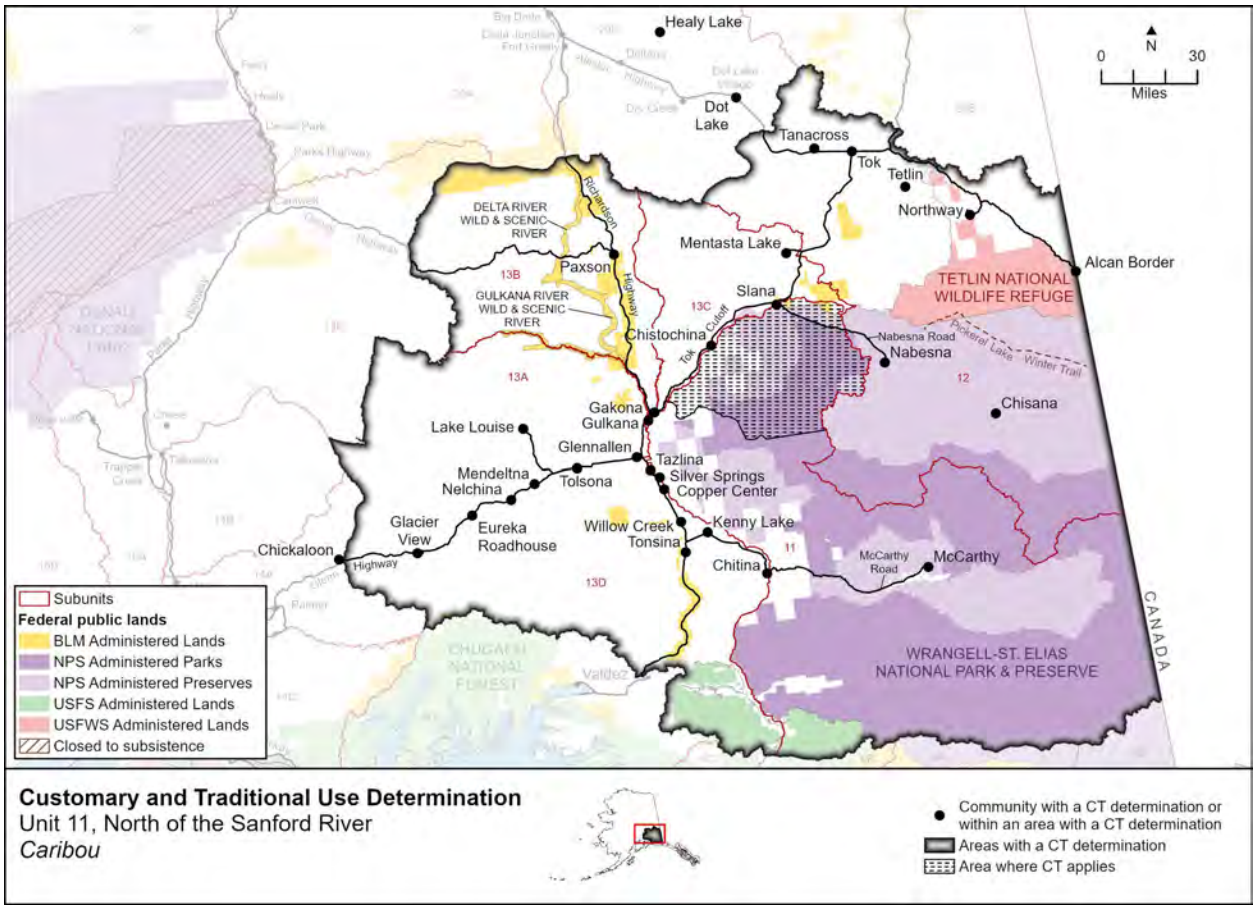

Figure 39. Communities and areas with a customary and traditional use determination for Unit 11 north of the Sanford River.

Unit 11, Remainder

Residents of Units 11, 13A–D, and Chickaloon have a customary and traditional use determination for caribou in the remainder of Unit 11 (**Figure 40**). Of these, McCarthy is the only community located fully within Unit 11 remainder, while the communities of Gakona, Gulkana, Glennallen, Tazlina, Silver Springs, Copper Center, Kenny Lake, and Chitina are located very close to the Copper River, which is the boundary of Unit 11 remainder with Unit 13.

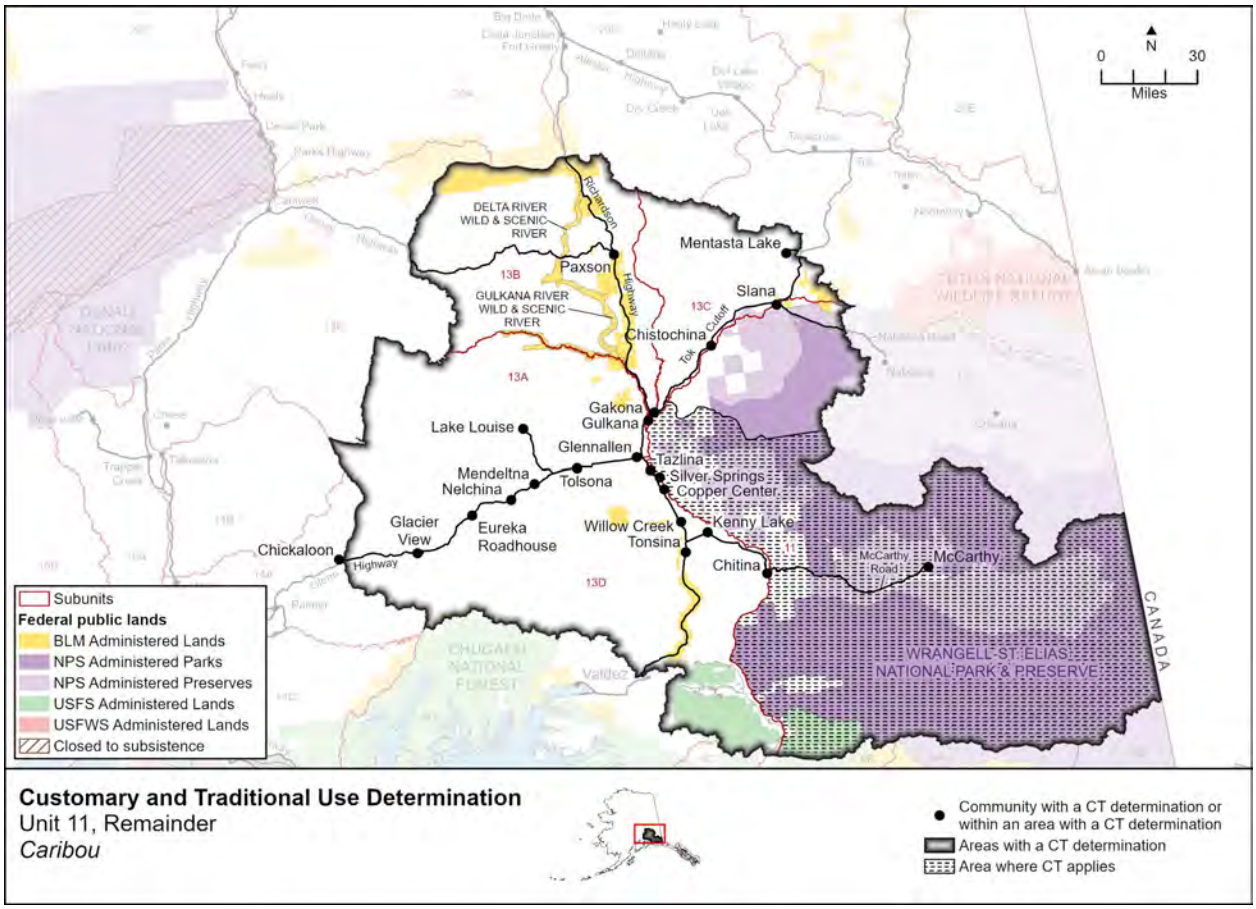

Figure 40. Communities and areas with a customary and traditional use determination for Unit 11 remainder.

Unit 12 Remainder

Although the customary and traditional use determination for caribou in Unit 12 is for the entire unit, this analysis seeks to identify those communities that should be prioritized for use of caribou in Unit 12 remainder only. Residents of Unit 12, Chistochina, Dot Lake, Healy Lake, and Mentasta Lake have a customary and traditional use determination for caribou in Unit 12, including within Unit 12 remainder (**Figure 41**). The communities of Tanacross, Tok, Tetlin, Northway, and Alcan Border are located within Unit 12 remainder. In addition, Mentasta Lake is located in Unit 13C very close to the boundary of Unit 12 remainder. Although Nabesna is in Unit 12, it is located to the south of the Unit 12 remainder caribou hunt area. However, it is still close to Unit 12 remainder. Dot Lake, Healy Lake, and Chistochina are also located in reasonable proximity to Unit 12 remainder.

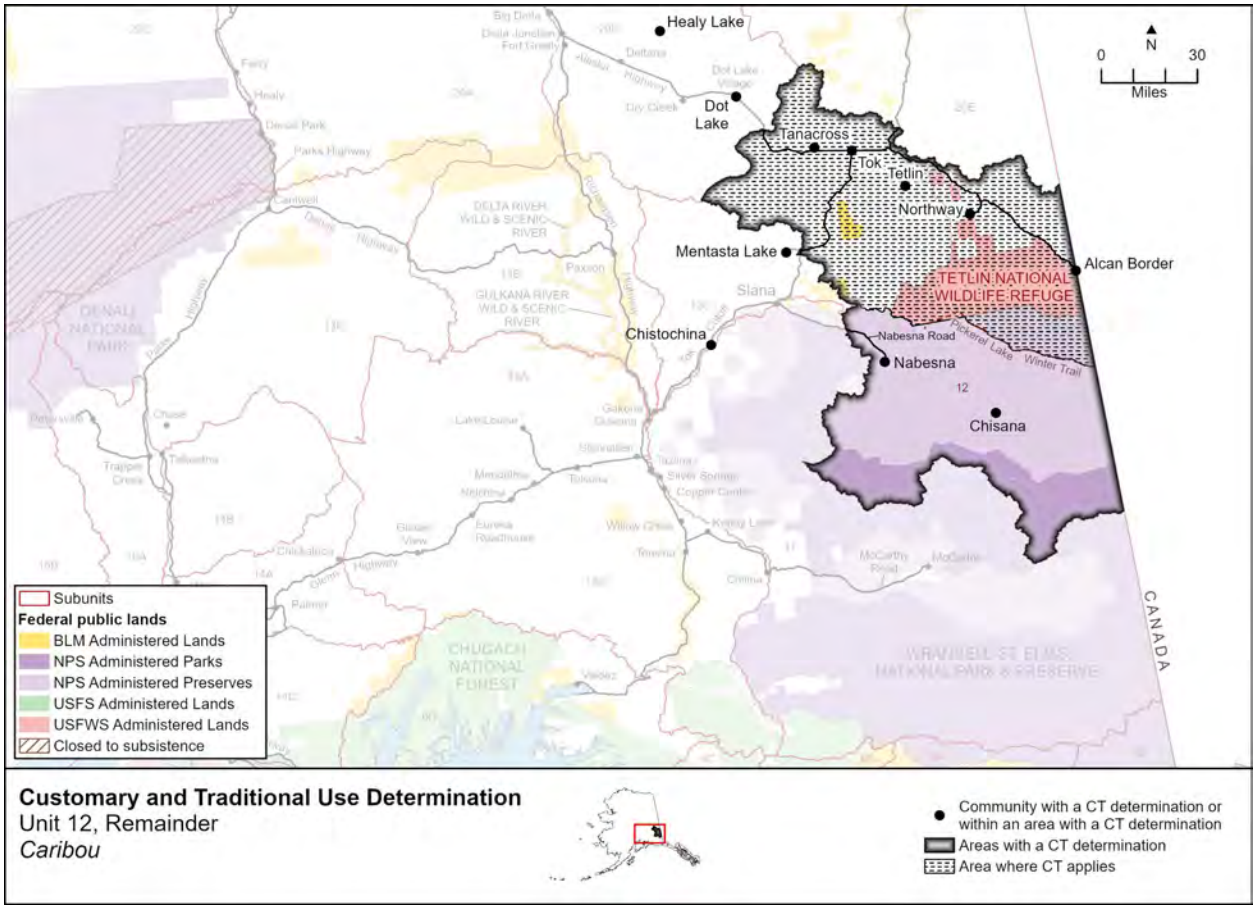

Figure 41. Communities and areas with a customary and traditional use determination for Unit 12.

Availability of Alternative Resources

Criterion 3 of §804 analyses is the availability of alternative resources. In the section of this analysis on Criterion 1, "Customary and Direct Dependence upon the Resource as a Mainstay of Livelihood," **Table 7** shows the estimated total amount of wild food harvested by each community during the most recent year for which they were surveyed. This gives one measure of communities' overall dependence on subsistence foods, in contrast to store-bought food. In a food emergency, some communities have easier access to grocery stores than others. Delta Junction, Glennallen and Tok are the regional hubs, and some communities are within an extended commuting distance to Palmer (e.g. Chickaloon, Glacier View). However, stores in Delta Junction, Glennallen and Tok are small, with prices higher than in urban areas. Other small stores in the area include a general store in Kenny Lake, and trading posts in Tazlina, and Chistochina. Healy Lake is not on the road system. McCarthy is notable for being located about 84 miles from the small store in Kenny Lake, or 129 miles from Glennallen. The end of the Nabesna Road is approximately 118 miles from Glennallen.

Subsistence surveys also tell us which resources were the most important contributors to the total harvest in terms of edible weight. Information on alternative resources used by each community is

contained in the community profiles in the "Customary and Direct Dependence" section of this analysis. For each community for which this information is available, **Table 44** lists the top five species contributing most to the total harvest in descending order. **Table 44** shows that Sockeye Salmon and moose are the most common top resource. Coho and Chinook Salmon are in the top five resources for many communities, and Humpback Whitefish is clearly important for Northway, Tanacross, and Tetlin. Halibut, Rainbow Trout, pike, clams, Burbot, snowshoe hare, beaver, bear, bison, Pink Salmon, blueberries, and cranberries are other resources that were available in enough abundance to represent a top five resource for one or more communities in the analysis.

Because Sockeye Salmon and moose are the most common resources for communities included in the analysis, the current abundance level of these resources in the region should be considered in assessing whether they could provide an alternative resource to caribou for some communities. The State upper Copper River Sustainable Escapement Goal (SEG) is 360,000–750,000 Sockeye Salmon, and the Copper River Delta SEG is 55,000–130,000 Sockeye Salmon (Joy et al. 2021). Since 2001, the ADF&G has successfully met or exceeded the minimum threshold of the SEG range for Sockeye Salmon in the Copper River annually (Joy et al. 2021a). The recent 10-year average (2013–2022) Copper River Sockeye Salmon total run is 1.98 million fish (Botz et al. 2021). Information is also available about the current status of Chinook Salmon in the Copper River; the Chinook Salmon lower bound SEG was not achieved in four years between 2013–2022. The recent 10-year average (2013–2022) Copper River Chinook Salmon total run is 46,120 fish (Botz et al. 2021). In 2024, the State closed all in-river fisheries, including the Glennallen Subdistrict subsistence fishery, to the retention of Chinook Salmon due to concerns that the escapement goal would not be met.

The moose population in Unit 13 has declined in recent years and was estimated at 14,543 moose in 2023, which is below State management objectives of 17,000-21,400 moose for all of Unit 13. Population status varies by subunit with moose abundance in Units 13A, 13C, and 13E remaining relatively stable since 2010. Units 13A and 13C moose population estimates remain within management objectives, while the Unit 13E population estimate dipped just below objectives in 2023. The Unit 13D moose population dipped below objectives in 2022, but then declined precipitously in 2023 to only 638 moose, almost half of the lower bound of the Unit 13D population objective range and a 70% decline from 2010 estimates. The Unit 13B moose population, however, has exhibited a consistently declining trend since 2010. Only 2,809 moose were estimated in Unit 13B in 2023, which is just over half (53%) of the lower bound of the Unit 13B population objective range and a 49% decline from 2010 estimates. Between 2004 and 2023, unit-wide fall bull:cow ratios have been above State management objectives, ranging from 27-35 bulls:100 cows and averaging 30.5 bulls:100 cows. Calf:cow ratios are low and suggest the moose population is declining. Between 2001 and 2023, ratios ranged from 10-27 calves:100 cows, averaging 19 calves:100 cows, with the low of 10 calves:100 cows occurring in 2023 (OSM 2024c).

In August 2024 the Board approved Temporary Wildlife Special Action WSA24-06 with modification, closing Federal public lands in Unit 13B only to moose hunting by non-federally qualified users for the 2024/25 and 2025/26 regulatory years. The Board stated that due to conservation concerns, and heavy

harvest pressure in Unit 13B, the closure is warranted for both the conservation of healthy populations of moose and to allow for continuation of subsistence uses as outlined in ANILCA Section 815(3).

The moose population in Unit 12 is currently estimated to be 5,300-7,500 moose (ADF&G 2024b), which is within or above the State's intensive management population objective of 4,000-6,000 moose unit-wide (Wells 2023). Overall, moose densities within Unit 12 are expected to remain stable, and bull:cow ratios within Tetlin NWR are high (54 bulls:100 cows) and can support additional harvest (OSM 2024a). However, local residents have reported experiencing difficulties harvesting moose due to warmer fall temperatures, which result in moose moving around later after the season closes. Reported harvest and success rates under the Federal permit hunt, FM1203 are very low, averaging 2.1 moose and 5.2% annually. WSA24-04, which extended the fall season in Unit 12 remainder (Tetlin NWR) by 10 days for the 2024/25 and 2025/25 regulatory years was a response to this concern (OSM 2024b).

Moose in Unit 11 are surveyed within WRST along the Nabesna and McCarthy Roads as well as along a backcountry airstrip. The moose population estimate from the most recent survey in 2023 was 1,330 moose, a 40% decline from the 2013 estimates of 2,199 moose. 2023 calf:cow ratios were low 8 calves:100 cows. Bull:cow ratios remained high at 64 and 44 bulls:100 cows in 2013 and 2023, respectively, indicative of a lightly hunted population (Cutting 2024, pers. comm.). Reported harvest and success rates under the Federal permit hunt, FM1106 are low, averaging 12.5 moose and 18.3% annually over the past 10 years. Federally qualified subsistence users harvest an additional 15 moose/year with a 16% success rate on average under the joint State-Federal permit hunt, RM291 along the Nabesna Road in Units 11 and 12 (WRST 2024).

Table 44. The top five resources harvested by each community by weight, in descending order, during the most recent survey year (ADF&G 2024c). In several cases two consecutive resources contributed roughly the same weight to the overall harvest. The order of communities reflects that used in earlier tables to show customary and traditional use determinations.

Community	Top Five Resources by Weight, Descending, in Most Recent Survey Year
McCarthy	Sockeye Salmon, moose, Coho Salmon, caribou, highbush cranberry
McCarthy Road	Sockeye Salmon, moose, Rainbow Trout, caribou, Chinook Salmon
Mentasta Pass (Tok Cutoff Road, mileposts 79—110)	Moose, caribou, Sockeye Salmon, Halibut, blueberries, pike
Northway	Humpback Whitefish, moose, Sockeye Salmon, Mallard Duck, Coho Salmon
Tanacross	Moose, Humpback Whitefish, caribou, pike, Broad Whitefish
Tetlin	Moose, Humpback Whitefish, caribou, pike, Burbot
Tok	Moose, caribou, Sockeye Salmon, Coho Salmon, Chinook Salmon
Glacier View	Moose, Sockeye Salmon, Coho Salmon, caribou, Halibut

Community	Top Five Resources by Weight, Descending, in Most Recent Survey Year
Sheep Mountain	Chinook Salmon, moose, Sockeye Salmon, Coho Salmon, caribou
Lake Louise	Moose, Sockeye Salmon, caribou, blueberry, Halibut
Nelchina	Moose, Sockeye Salmon, caribou, razor clams, blueberry
Mendeltna	Sockeye Salmon, caribou, blueberry, halibut, Chinook Salmon
Tolsona	Sockeye Salmon, moose, Halibut, Burbot, blueberry
Glennallen	Sockeye Salmon, moose, caribou, Chinook Salmon, Coho Salmon
Paxson	Caribou, moose, Sockeye Salmon, Coho Salmon, beaver
Gulkana	Sockeye Salmon, moose, Chinook Salmon, caribou, Humpback Whitefish
Chistochina	Sockeye Salmon, moose, Chinook Salmon, snowshoe hare, beaver
Gakona	Sockeye Salmon, moose, caribou, beaver, Chinook Salmon
Mentasta Lake	Moose, Sockeye Salmon, caribou, blueberry, lowbush cranberry
Slana/Nabesna Rd	Sockeye Salmon, moose, Coho Salmon, caribou, Halibut
Chitina	Sockeye Salmon, Chinook Salmon, caribou, Coho Salmon, moose
Copper Center/ Silver Springs	Sockeye Salmon, moose, caribou, Chinook Salmon, Coho Salmon
Kenny Lake/Willow Creek	Sockeye Salmon, moose, Chinook Salmon, caribou, Halibut
Tazlina	Sockeye Salmon, moose, Chinook Salmon, caribou, Coho Salmon
Tonsina	Sockeye Salmon, caribou, moose, Coho Salmon, Chinook Salmon
Cantwell	Moose, caribou, Sockeye Salmon, brown bear, blueberry
Chase	Caribou, moose, Coho Salmon, Sockeye Salmon, blueberry
Chickaloon	Moose, Rainbow Trout, Coho Salmon, Sockeye Salmon, bison
Denali Park CDP	Sockeye Salmon, Halibut, blueberry, caribou, low bush cranberry
Delta Junction	No data
Dot Lake	Moose, Coho Salmon, caribou, Sockeye Salmon, Pink Salmon
Dry Creek	Moose, Sockeye Salmon, caribou, low bush cranberry, Rainbow Trout
Healy Lake	Moose, caribou, unknown whitefishes, Burbot, high bush cranberry

Other Alternatives Considered

One alternative considered was to delegate authority to Federal in-season managers to manage the Nelchina caribou hunts via delegation of authority letters (DAL) only. However, any in-season management action taken through a DAL is considered a special action, subject to additional analysis requirements and a public hearing if the action is longer than 60 days. Maintaining the delegated authority in the unit-specific regulations clarifies that these are routine, annual management actions, reduces the regulatory and administrative burden, and allows the public to easily reference what authority is delegated for particular hunts. Additionally, as delegating authority is an administrative (not regulatory) action, the Board can delegate additional authority to in-season managers if needed at any time.

Another alternative considered was to rescind existing DALs and move the authority delegated in the existing letters into unit-specific regulations. As mentioned above, management actions taken through a DAL are special actions. Issuing special actions for routine, annual management decisions is not appropriate. Therefore, OSM is proposing to move the authority currently delegated in all wildlife letters into unit-specific wildlife harvest regulations. This reduces the burden on in-season Federal managers and allows changes to delegated authority to be requested through the regulatory process. This is a programmatic initiative and not something unique to this analysis.

Another alternative considered was to exclude Unit 11 from the §804 analysis and prioritization due to lack of information. No recent harvest records exist in Unit 11 because there is currently no State hunt, and the recently established Federal season has never been announced. Unit 13 is where most communities harvest from the Nelchina herd, rather than in Unit 11. However, this alternative was not further considered because the §804 analysis request is for the range of the Nelchina herd, and if a season is announced in Unit 11 in the future, the harvestable surplus is likely to be minimal, warranting a restricted pool of users. Additionally, the regulatory process may provide additional information on which communities should be included in the §804 prioritization for Unit 11.

Another alternative considered was to extend this analysis to Unit 20E because a significant portion of the Nelchina caribou herd overwinters there in some years. The winter caribou season in Unit 20E is by joint Federal/State registration permit and targets the Fortymile caribou herd. However, including Unit 20E is beyond the scope of this analysis.

Effects of the Proposal

If this proposal is adopted, all NCH hunts in Units 11, 12 remainder, and 13 will be changed to may be announced seasons, authority will be delegated to the Federal in-season manager to manage the NCH hunts, and Federal caribou hunts in Units 11, 12 remainder, and 13 will be limited to those residents identified through the §804 analysis.

Changing seasons to ‘may be announced’ and delegating authority to Federal in-season managers would optimize management flexibility to respond to changing hunt and herd conditions in a timely

manner. As soon as a harvestable surplus of caribou becomes available, in-season managers could announce a season, providing sustainable hunting opportunity.

The restricted pool of eligible users would be able to harvest from the NCH if herd population levels allow for limited harvest in the future. A §804 user prioritization reduces the pool of eligible users, removing potential harvest opportunity for some federally qualified subsistence users. However, because there is currently no harvestable surplus for the NCH and all Federal NCH hunts are currently closed, there would be no immediate impact on these users. If a limited harvestable surplus becomes available in the future, the §804 prioritization will help ensure that those communities that are most reliant on the NCH will have some opportunity to harvest caribou. Once the NCH recovers more fully, a proposal may be submitted to remove the §804 prioritization and return harvest opportunity to all federally qualified subsistence users. Additionally, if the §804 prioritization is adopted, these closures will be subject to the Board's closure review policy, which stipulates that closures will be reviewed every four years to ensure they do not remain in effect longer than necessary.

OSM PRELIMINARY CONCLUSION

Support Proposal WP25-01 **with modification** to specify which communities are eligible to hunt caribou via the §804 user prioritization analysis, add WRST and DENA superintendents to the entities consulted in Unit 13 remainder, and rescind existing DALs, moving existing delegated authority to unit-specific regulations (**Appendix 1**).

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 modified draft regulation reads:

Unit 11−Caribou	
1 bull by Federal registration permit	*May be announced.*

The Wrangell-St. Elias National Park and Preserve Superintendent, in consultation with the Alaska Department of Fish and Game, Office of Subsistence Management, and Chairs of the affected Councils, may announce season dates, harvest quotas, the number of permits to be issued, open/close seasons, and define harvest areas. ***Federal public lands in Unit 11 north of the Sanford River are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, and Slana/Nabesna Rd. hunting under these regulations.*** ***Federal public lands in Unit 11 remainder are closed to caribou hunting except by residents of Chitina, Copper Center/Silver Springs, Kenny Lake/Willow Creek, Gakona, Glennallen, Gulkana, McCarthy, McCarthy Road, Tazlina, and Tonsina hunting under these regulations.***	
Unit 12—Caribou	
Unit 12, remainder—1 bull ***OR***	***May be announced between*** *Sep. 1–20.*
~~*Unit 12, remainder*~~ *—1 caribou* ~~*may be taken*~~ *by* ~~*a*~~ *Federal registration permit* ~~*during a winter season to be announced*~~*.* ~~*Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by*~~ *The Tetlin National Wildlife Refuge Manager**,** in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists,* ***Office of Subsistence Management,*** *and Chairs of the Eastern Interior* ***Alaska Subsistence*** *Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee* ***may announce season dates, harvest quotas, open/close seasons, and for the winter season, set sex restrictions.*** ***Federal public lands in Unit 12 remainder are closed to caribou hunting except by residents of Alcan Border, Dot Lake, Mentasta Pass, Northway, Tanacross, Tetlin, and Tok hunting under these regulations.***	*Winter season* ~~*to*~~ ***may*** *be announced* ***between Oct. 1-Apr. 30****.*

Unit 13−Caribou	
Units 13A and 13B— up to 2 caribou by Federal registration permit only (FC1302) ***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.*** ***Federal public lands in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, 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.***	***May be announced between** Aug. 1–Sep. 30* ***May be announced between** Oct. 21–Mar. 31*
Unit 13, remainder—2 bulls by Federal registration permit only (FC1302) ***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.*** ***Federal public lands in Unit 13C are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, 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.***	***May be announced between** Aug. 1–Sep. 30* ***May be announced between** Oct. 21–Mar. 31*

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.*	

* Additionally, it is OSM's intent that Kevin and Blaine Mayo and their households be included in the Section 804 prioritization, so that they remain eligible to hunt 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.

Justification

Based on information provided in the analysis, the communities listed in the modified regulation meet the criteria for §804 prioritization in Units 11 north of the Sanford River, Unit 11 remainder, Unit 12 remainder, and Units 13A through E.

Unit 13, and in particular Unit 13B, is the most-used area for caribou harvest by communities located in the heart of the NCH range. However, this analysis has made recommendations for prioritization throughout the range of the herd. In Unit 11 there are no recent harvest records because there is currently no caribou hunt in State regulations, and while a Federal may be announced season was established in 2022, the season has never been announced. Because there are no records of past harvest in Unit 11, the recommendation for prioritization relies more heavily on local residency and availability of alternative resources, as well as patterns of caribou dependence in nearby areas. Additional feedback from the Councils, tribal and ANCSA corporation consultations, and tribes is sought to strengthen the basis of the §804 prioritization for Unit 11.

Changing all NCH seasons to 'may be announced' and delegating authority to in-season managers to manage the hunts provides management flexibility to respond to changing hunt and herd conditions. Given the precipitous decline of the NCH, no harvestable surplus is currently available and Federal hunts should remain closed at this time to aid in the recovery of the herd. However, creating 'may be announced' seasons avoids closing the season in codified Federal regulation, enabling subsistence hunting opportunity to be provided as soon as it is biologically sustainable to do so, reducing regulatory and administrative burdens and in recognition of the importance of the NCH as a subsistence resource to federally qualified subsistence users.

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. DENA and WRST have lands in Unit 13 remainder, so they should also be consulted prior to any in-season management actions in that area.

ADDENDUM

OSM CONCLUSION

Support Proposal WP25-01 as modified by the Southcentral and Eastern Interior Councils.

Justification

The OSM analysis draws on available reports and subsistence survey and harvest data, resulting in the §804 prioritization for caribou recommended in OSM's preliminary conclusion in Units 11 north of the Sanford River, Unit 11 remainder, Unit 12 remainder, and Units 13A through E. However, tribal testimony presented at the subsequent meetings of the Eastern Interior and Southcentral Councils indicated that, in addition to the OSM recommended prioritization, additional communities should be included in the §804 determination. Specifically, both Councils recommended including Gakona in the prioritization for caribou in Unit 13A, Gulkana in Unit 13C, and Chistochina and Mentasta Lake in Unit 12 remainder. Testimony indicated that these communities rely on caribou in each respective area. Based on tribal testimony and Council support for this modification, OSM supports adding these communities to the prioritization for the NCH.

Changing all NCH seasons to 'may be announced' and delegating authority to in-season managers to manage the hunts provides management flexibility to respond to changing hunt and herd conditions. Given the precipitous decline of the NCH, no harvestable surplus is currently available and Federal hunts should remain closed at this time to aid in the recovery of the herd. However, creating 'may be announced' seasons avoids closing the season in codified Federal regulation, enabling subsistence hunting opportunity to be provided as soon as it is biologically sustainable to do so, reducing regulatory and administrative burdens and in recognition of the importance of the NCH as a subsistence resource to federally qualified subsistence users.

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. DENA and WRST have lands in Unit 13 remainder, so they should also be consulted prior to any in-season management actions in that area.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Eastern Interior Alaska Subsistence Regional Advisory Council

Support WP25-01 **as modified** by Office of Subsistence Management in their preliminary conclusion, with additional modifications to the Section 804 determination: add Gakona to Unit 13A, Gulkana to Unit 13C, and Mentasta Lake and Chistochina to Unit 12 remainder.

The Council supported this proposal because there is a significant conservation concern for the Nelchina Caribou Herd and the population is so low that hunting is currently closed to all users. It will likely be years before there is any harvestable surplus, and even longer until a hunt can be opened without restrictions. The Section 804 analysis process was designed to help establish a priority for hunt eligibility in times of conservation. The Council feels that OSM has done a thorough job in the analysis but would also like to see the modification made to add Gakona to Unit 13A, Gulkana to Unit 13C, and Mentasta Lake and Chistochina to Unit 12 remainder. Evidence for the importance of Nelchina caribou for these four communities in these areas was provided through Tribal and public testimony, and Council member discussion. Although some federally qualified users will benefit from this Section 804 prioritization, and others will not, the temporary restrictions are necessary to protect the resource during times of conservation.

Note: The regulatory language for this modification will be developed if needed after Board action on this proposal.

Southcentral Alaska Subsistence Regional Advisory Council

Support WP25-01 **as modified** by the Eastern Interior Council (including the OSM modifications in their preliminary conclusion and additional modifications to the §804 determination made by the Eastern Interior Council).

The Council supported this proposal based on the information presented in the OSM analysis and in Tribal testimony provided by Ahtna Intertribal Resource Commission. The Council recognized the tremendous effort and amount of work that went into this proposal analysis. The Council expressed how unfortunate it is that there is such a severe conservation concern but appreciated that everyone is teaming up to make the best of it and do what needs to be done given the tough circumstances.

Note: The regulatory language for this modification will be developed if needed after Board action on this proposal.

INTERAGENCY STAFF COMMITTEE COMMENTS

The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Alaska Department of Fish and Game is **neutral** on Wildlife Proposal WP25-01.

APPENDIX 1: EXISTING DELEGATION OF AUTHORITY LETTERS

Federal Subsistence Board

1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 - 6199

FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

JUN 09 2022

In Reply Refer To
OSM 22072.5LG

Wrangell-St. Elias National Park and Preserve
National Park Service
PO Box 439
Copper Center, AK 99573

Dear Superintendent:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the superintendent of the Wrangell-St. Elias National Park and Preserve (WRST) to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of a wildlife population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Unit 11 for the management of caribou on these lands.

It is the intent of the Board that actions related to management of caribou by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), representatives of the Office of Subsistence Management (OSM), and the Chair(s) of the affected Council(s) to the extent possible. The Office of Subsistence Management will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local Tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. Delegation: The Wrangell-St. Elias National Park and Preserve Superintendent is hereby delegated authority to issue emergency or temporary special actions affecting caribou on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "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."

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

- To announce season dates, harvest quotas, and number of permits to be issued;
- To define harvest areas; and
- To close the Federal hunt early if the harvest quota is reached before the announced season closing date or Nelchina caribou are no longer present.

This delegation also permits you to close and reopen Federal public lands to non-subsistence hunting, but does not permit you to specify permit requirements or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve caribou populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations, shall be directed to the Board.

The Federal public lands subject to this delegated authority are those within Unit 11.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 50 CFR 100.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected Federally qualified subsistence users and non-Federally qualified users. Requests not within your delegated authority will be forwarded to the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in the OSM no later than 60 days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Government-to-Government Tribal Consultation Policy (Federal Subsistence Board Government-to-Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).

You will immediately notify the Board through the Assistant Regional Director for the OSM, and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with the OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), the OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, the OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, the OSM, affected State and Federal managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. <u>Support Services:</u> Administrative support for regulatory actions will be provided by the OSM.

Sincerely,

Anthony Christianson
Chair

cc: Federal Subsistence Board
Assistant Regional Director, Office of Subsistence Management
Deputy Assistant Regional Director, Office of Subsistence Management
Subsistence Policy Coordinator, Office of Subsistence Management
Wildlife Division Supervisor, Office of Subsistence Management
Coordinator, Southcentral Subsistence Regional Advisory Council, USDA – Forest Service
Chair, Southcentral Alaska Subsistence Regional Advisory Council
Chair, Eastern Interior Subsistence Regional Advisory Council
Deputy Commissioner, Alaska Department of Fish and Game
Special Project Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record

Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199

FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

JUN 20 2024

In Reply Refer To:
OSM.B24042

Glennallen Field Office Manager
Bureau of Land Management
PO Box 147
Glennallen, Alaska 99588

Dear Field Office Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the manager of the Bureau of Land Management (BLM) Glennallen Field Office (GFO) to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of a wildlife population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Units 13A and 13B for the management of caribou on these lands.

It is the intent of the Board that actions related to management of caribou by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), representatives of the Office of Subsistence Management (OSM), the Ahtna Intertribal Resource Commission (AITRC), and the Chair of the affected Council(s) to the extent possible. The OSM will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local Tribes, and Alaska Native corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. **Delegation:** The Glennallen Field Office Manager is hereby delegated authority to issue emergency or temporary special actions affecting caribou on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action)

requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "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."

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

- Close, reopen, and adjust season dates.
- Set harvest limits, including sex restrictions.
- Set any needed permit conditions.

This delegation also permits you to close and reopen Federal public lands to nonsubsistence hunting but does not permit you to specify permit requirements or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve caribou populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations, shall be directed to the Board.

The Federal public lands subject to this delegated authority are those within Units 13A and 13B.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 50 CFR 100.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected federally qualified subsistence users and non-federally qualified users. Requests not within your delegated authority will be forwarded to the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Consultation Policies (Federal Subsistence Board Government-to-Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).

You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of each calendar year for presentation to the Council(s).

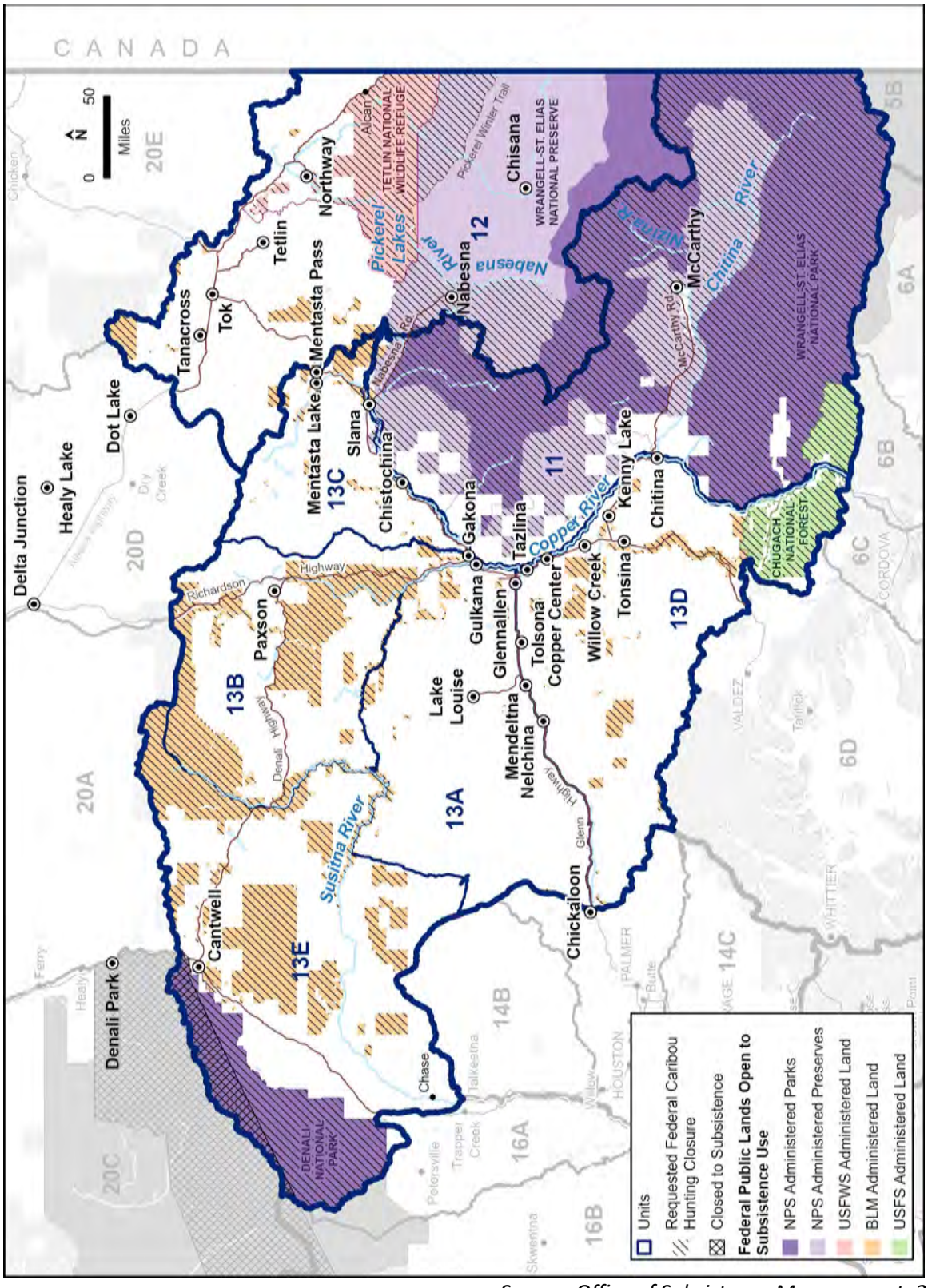
You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of federally qualified subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

Sincerely,

Anthony Christianson
Chair

cc: Federal Subsistence Board
Office of Subsistence Management
Chair, Southcentral Interior Alaska Subsistence Regional Advisory Council
Chair, Eastern Interior Alaska Subsistence Regional Advisory Council
Executive Director, Ahtna Intertribal Resource Commission
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director for Wildlife Conservation, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record

Federal public lands in Units 11, 12, and 13



Source: Office of Subsistence Management, 2024

Wrangell-St. Elias SRC Working Group Recommendation on Nelchina Caribou ANILCA Section 804 Analysis

A working group of the Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met on January 7, 2025, to discuss the ANILCA Section 804 analysis for the Nelchina caribou herd. The working group members were M. Starr Knighten, Nathan Brown, Bruce Ervin, and Dan Stevens. Park staff at the meeting were Amber Cohen, Barbara Cellarius, Benjamin Pister, and Joshua Scott.

The working group recommends the following changes the ANILCA Section 804 prioritization for Nelchina caribou (see also the table on the next page):

- Add **Healy Lake** to the **Unit 12 remainder** determination to match Dot Lake, because many people go back and forth between Dot Lake and Healy Lake.
- Add **Gulkana** to the **Unit 13C** determination as recommended by the Eastern Interior and Southcentral Regional Advisory Councils (RACs).
- Although not specifically discussed, no objection was expressed to the RAC recommendations to add **Gakona** to the **Unit 13A** determination and **Chistochina** to the **Unit 12 remainder** determination.
- Add **Mentasta Lake** to the **Unit 12 remainder** determination as recommended by the Eastern Interior and Southcentral RACs, because Mentasta Lake residents are closely related to other people who have prioritization for Unit 12 remainder.
- Add **Mentasta Pass** to the **Unit 11 N of Sanford River** determination to match Mentasta Lake, because they are both prioritized for Unit 13C, which is 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 Creek** and **Tonsina** to the **Unit 13A** determination to match nearby communities.

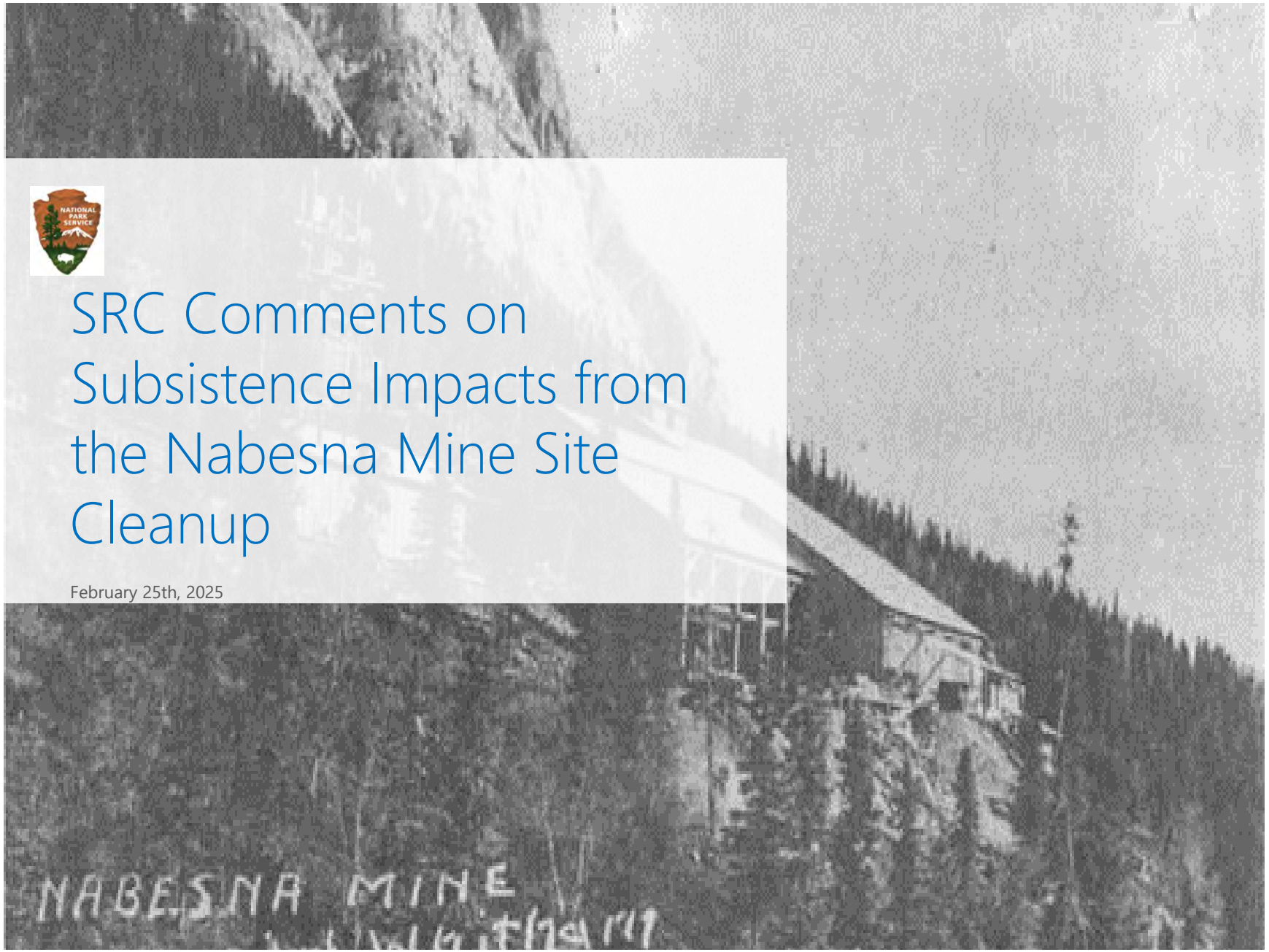
Additionally, since Northway, Tetlin, Tanacross, and Tok do not have customary and traditional (C&T) use determinations for caribou in Unit 13C, it was suggested that the SRC write a Unit 13C caribou C&T proposal for the upcoming wildlife cycle.

Nelchina Caribou Customary and Traditional Use Determinations vs. Section 804 Prioritization

- Yellow = OSM preliminary recommendation for Section 804 prioritization.
- Green = Recommendations from Southcentral and Eastern Interior Regional Advisory Councils for additional communities.
- Blue = Wrangell-St. Elias SRC working group recommendations for additional communities (beyond RAC recommendations).
- X= current C&T use determinations, Bolded **X** = C&T determinations in unit or subunit in which community is located.

Wrangell-St. Elias NP Resident Zone Community	**Community Location by Unit**	**Unit 13A** (Middle of GMU. Glenn Hwy to Gulkana R)	**Unit 13B** (Central/North part of GMU N of Gulkana R)	**Unit 13C** (NE corner of GMU near Slana)	**Unit 13D** (S part of GMU/ S of Glenn Hwy)	**Unit 13E** (W side of GMU, Denali/ Cantwell area)	**11, N of Sanford R**	**11, S of Sanford R**	**Unit 12 remainder** (Tetlin NWR, N of Winter trail)
Dot Lake	20D		X	X			X		X
Healy Lake	20D		X	X			X		X
Northway	12						X		**X**
Tanacross	12						X		**X**
Tetlin	12						X		**X**
Tok	12						X		**X**
Glennallen	13A/D	**X**	X	X	**X**	X	X	X	
Gulkana	13B	X	**X**	X	X	X	X	X	
Gakona	13B/C	X	**X**	**X**	X	X	X	X	
Chistochina	13C	X	**X**	X	X	X	X	X	X
Mentasta Lake	13C	X	X	**X**	X	X	X	X	X
Mentasta Pass	12		X	X			X		**X**
Slana	11/13C	X	X	**X**	X	X	**X**	X	
Nabesna Rd	11/12	X	X	X	X	X	**X**	*	**
McCarthy	11	X	X	X	X	X	X	**X**	
McCarthy Road	11	X	X	X	X	X	X	**X**	
Chitina	13D	X	X	X	**X**	X	X	X	
Copper Center/ Silver Springs	13D	X	X	X	**X**	X	X	X	
Kenny Lake/ Willow Creek	13D	X	X	X	**X**	X	X	X	
Tazlina	13D	X	X	X	**X**	X	X	X	
Tonsina	13D	X	X	X	**X**	X	X	X	

*Residents of the portion of Nabesna Road in Unit 11 have C&T; residents of the portion of Nabesna Road in Unit 12 do not have C&T.
**Residents of the portion of Nabesna Road in Unit 12 have C&T; residents of the portion of Nabesna Road in Unit 11 do not have C&T.



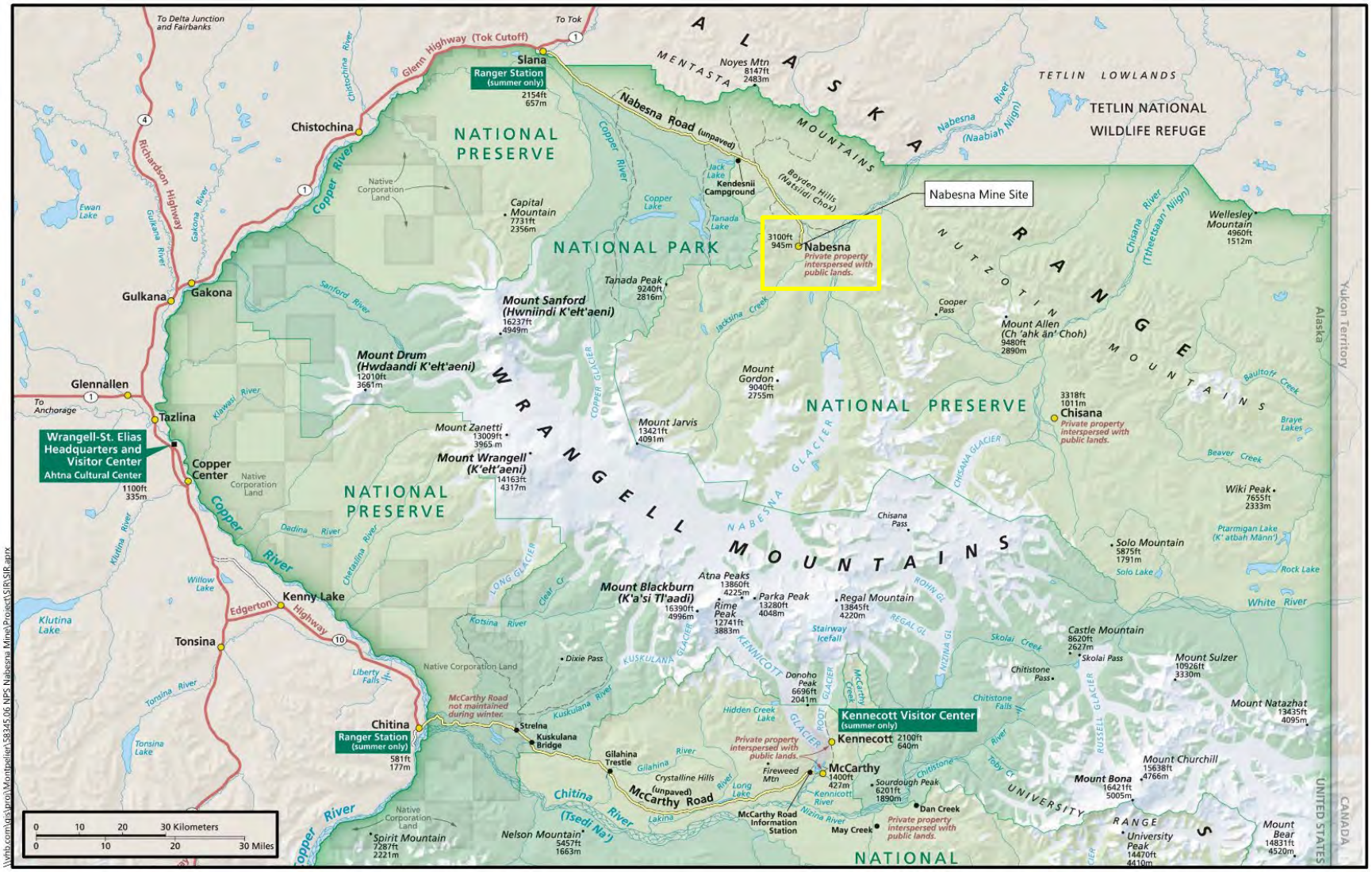
SRC Comments on Subsistence Impacts from the Nabesna Mine Site Cleanup

February 25th, 2025

What are we asking of the SRC?

The NPS is developing a proposed plan to clean up arsenic laden mine tailings at the Nabesna Mine. The construction traffic may have impacts.

1. What should NPS keep in mind regarding subsistence activities along the Nabesna Road when planning this work?
2. Besides sheep hunting, moose hunting, and berry picking, what other subsistence activities should we be mindful of? Note, it is possible some work may happen in the winter.
3. Are there specific staging areas along the Nabesna road that should be avoided (or preferentially used) to avoid subsistence impacts by construction equipment?



Location of Nabesna Mine Site in Wrangell-St. Elias National Park and Preserve

Background Information

1920s - 1940

- Gold and silver were mined and milled at the Nabensa Mine.
- The Nabesna Road was constructed to service the mine.
- Finely ground tailings (crushed rock left over from milling process) high in heavy metals were deposited in a tailings pond.
- At some point after the mine closed a containment facility holding the tailings collapsed (probably in the 1950s or ‘60s) and released tailings downslope of the mill building.

1981 - 2000

Site investigations identified adverse impacts to soils, sediments, and surface water in Cabin Creek caused by migration of the heavy metals in the tailings (principally arsenic, but also lead and mercury, and possibly others).

Background Information Cont.

2008-Present

- NPS is updating an Engineering Evaluation/Cost Analysis (EE/CA – pronounced "eek-ka") under the Comprehensive, Environmental, Response, Compensation, and Liabilities Act (CERCLA, a.k.a. Superfund) to fully characterize the Site, evaluate human and ecological risks, develop & analyze removal action alternatives, and identify a recommended alternative.

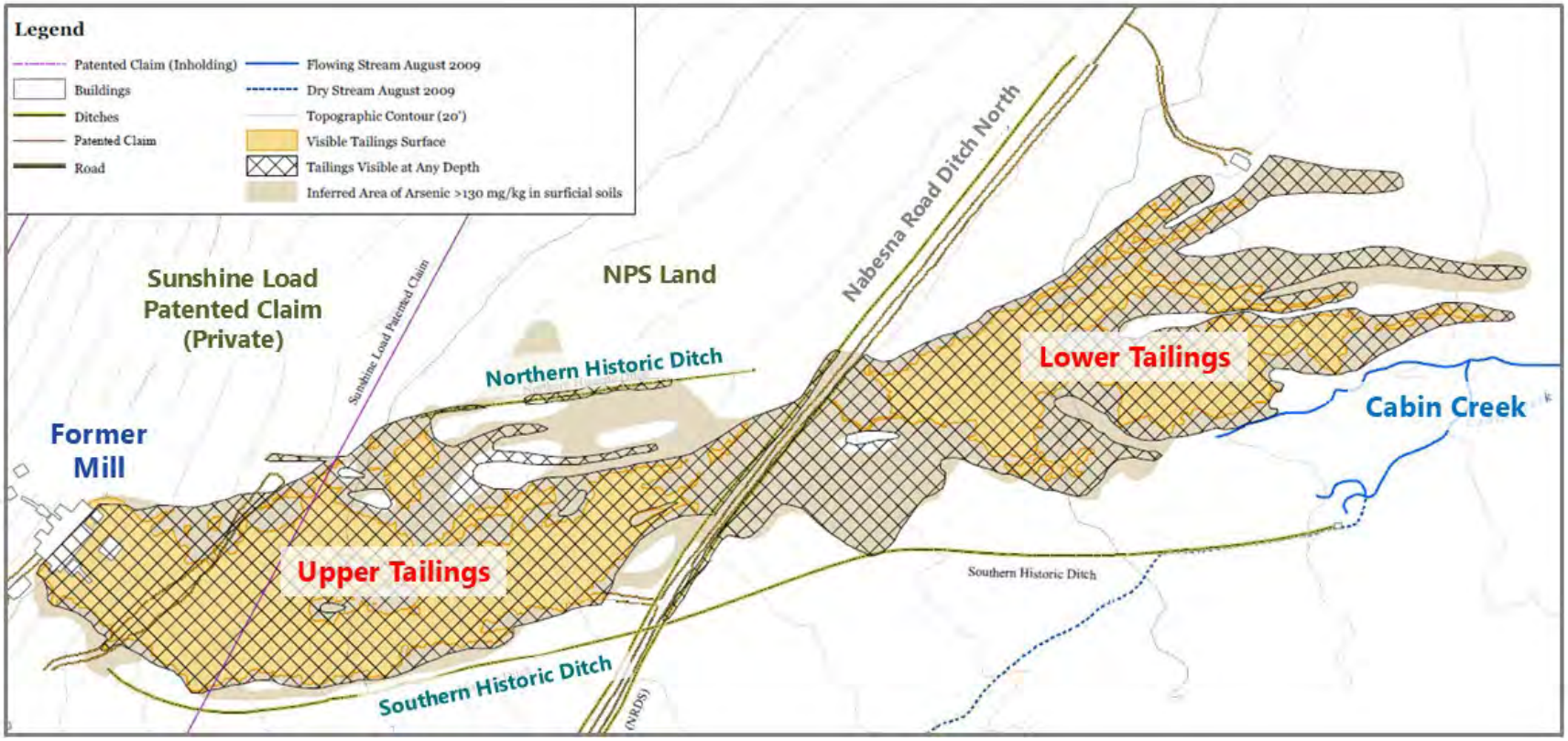
- The range of alternatives includes:
  - A no action alternative
  - An alternative that includes consolidating and capping the contaminated tailings and soil in place
  - An alternative to remove all tailings and soil completely, and shipping them through Valdez to a suitable waste facility
  - Two alternatives that combine aspects of the other alternatives (capping or removing tailings)

Background Information Cont.

2008-Present

- Except for the no action alternative, all the clean up alternatives include the use of heavy equipment accessing the site.
- Except for the no action alternative, all the alternatives include some level of improvement for the Nabesna Road to accommodate the heavier equipment needed.
- Three out of five of the alternatives include substantial dump truck traffic along the Nabesna Road.

Site Background – Key Site Features

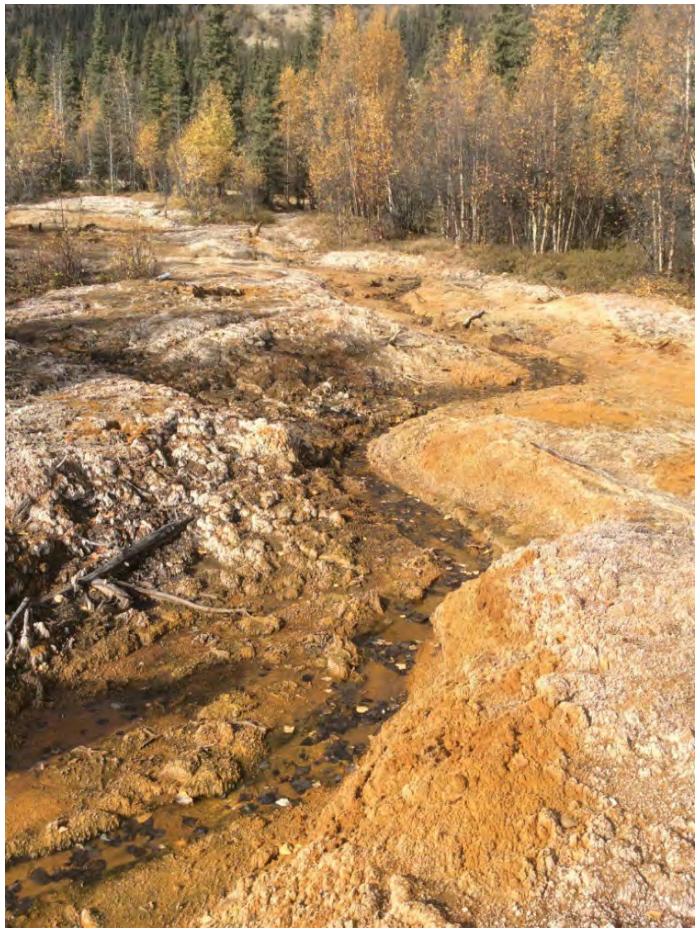


Site Background – Quantity Estimates

Upper Tailings Area	Lower Tailings Area	Cabin Creek	Site-Wide
• 7 acres • Up to 10 ft deep • 10,100 CY (tailings) • 7,600 CY (impacted soil)	• 5.5 acres • Up to 2 ft deep • 5,800 CY (tailings) • 7,300 CY (impacted soil)	• 1,000 ft of creek bed • Up to 0.5 ft deep • 200 CY (impacted sediment)	• 12.5 acres • 15,900 CY (tailings) • 15,100 CY (impacted soil/ sediment) • 31,000 CY (total)

Where We Are

- The draft EE/CA Report is currently under revision and detailing the range of alternatives for removal action. When the draft EE/CA Report is completed, it will be available for public comment.
- The park has already invited informal comments from local residents along the Nabesna Road and Tribes that might use the Nabesna Road for subsistence activities (or other uses). Including:
  - Cheesh'na Tribe, Village of Dot Lake, Native Village of Gakona, Gulkana Village Council, Healy Lake Village, Native Village of Chitina, Native Village of Kluti Kaah, Northway Village, Mentasta Traditional Council, and Native Village of Tazlina, Native Village of Tetlin*, Tanacross Village Council*.
  - Slana
  - Individual residents beyond Mile 20 of the Nabesna Road
- Once the EE/CA is finalized and an alternative selected, funding will be procured for work to begin… likely at least 4 to 6 years in the future.
- Comments on subsistence activities received now will be used for Slane planning purposes to minimize impacts of the clean up to subsistence activities.



*Did not respond

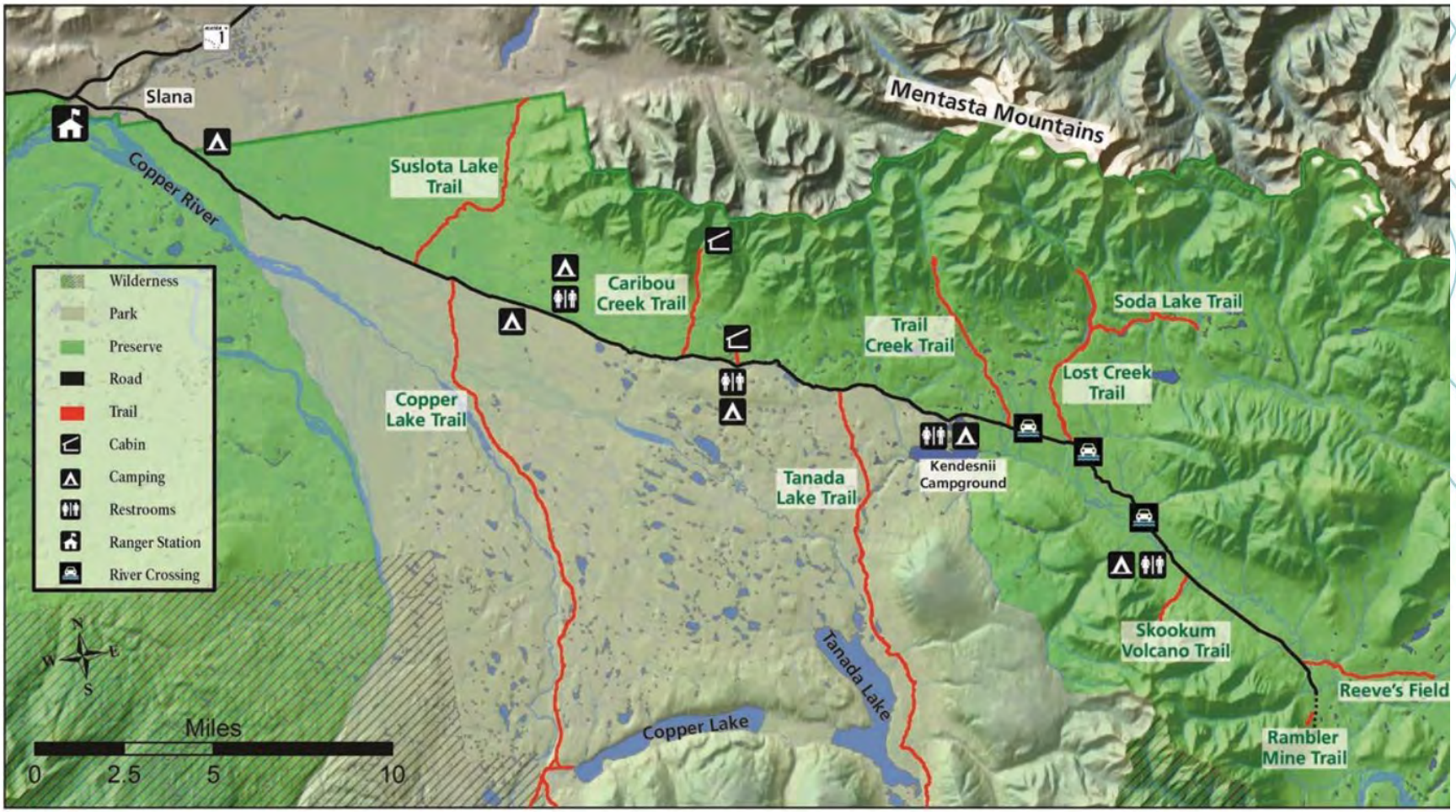
Questions for the SRC?

1. What should NPS keep in mind regarding subsistence activities along the Nabesna Road when planning this work?

2. Besides sheep hunting, moose hunting, and berry picking, what other subsistence activities should we be mindful of? Note, it is possible some work may happen in the winter.

3. Are there specific staging areas along the Nabesna road that should be avoided (or preferentially used) to avoid subsistence impacts by construction equipment?

Nabesna Road Map



Federal Subsistence Board Informational Flyer

U.S. Fish and Wildlife Service
Bureau of Land Management
National Park Service
Bureau of Indian Affairs

Forest Service

Contact: Regulatory Affairs Specialist
(907) 786-3888 or (800) 478-1456
subsistence@ios.doi.gov

How to Submit a Proposal to Change Federal Subsistence Regulations

Alaska residents and subsistence users are an integral part of the Federal regulatory process. Any person or group can submit proposals to change Federal subsistence regulations, comment on proposals, or testify at meetings. By becoming involved in the process, subsistence users assist with effective management of subsistence activities and ensure consideration of traditional and local knowledge in subsistence management decisions. Subsistence users also provide valuable wildlife harvest information.

A call for proposals to change Federal subsistence regulations is issued in January of even-numbered years for fisheries and odd-numbered years for wildlife. The period during which proposals are accepted is no less than 30 calendar days. Proposals must be submitted in writing within this time frame.

You may propose changes to Federal subsistence season dates, harvest limits, methods and means of harvest, and customary and traditional use determinations.

What your proposal should contain:

There is no form to submit your proposal to change Federal subsistence regulations. Include the following information in your proposal submission (you may submit as many as you like):

- Your name and contact information (address, phone, fax, or E-mail address)
- Your organization (if applicable)
- What regulations you wish to change. Include the species and management unit number (wildlife) or management area (fisheries). Quote the current regulation or, if you are proposing a new regulation, please state, “new regulation”
- Write the regulation the way you would like to see it written in the regulations
- Explain why this regulation change should be made
- You should provide any additional information that you believe will help the Federal Subsistence Program and participants in evaluating the proposed change

You may submit your proposals by:

1. By mail or hand delivery to:
   Regulations
   Attn: (enter Docket number)
   Office of Subsistence Management
   1011 E. Tudor Road M/S 121
   Anchorage, AK 99503

2. At any Federal Subsistence Regional Advisory Council meeting (A schedule will be published in the Federal Register and be announced statewide, bi-annually, prior to the meeting cycles)
3. On the Web at http://www.regulations.gov

Submit a separate proposal for each proposed change; however, do not submit the same proposal by different accepted methods listed above. To cite which regulation(s) you want to change, you may reference 50 CFR 100 or 36 CFR 242 or the proposed regulations published in the Federal Register: http://www.gpoaccess.gov/fr/index.html. All proposals and comments, including personal information, are posted on the Web at http://www.regulations.gov.

For the proposal processing timeline and additional information contact the Office of Subsistence Management at (800) 478-1456/ (907) 786-3888 or go to https://www.doi.gov/subsistence/process.

How a proposal to change Federal subsistence regulations is processed:

1. Once a proposal to change Federal subsistence regulations is received by the Board, the Office of Subsistence Management (OSM) validates the proposal and assigns a proposal number and lead analyst.
2. The proposals are compiled for statewide distribution and posted online at the Program website. The proposals are also sent to the applicable Councils, the Alaska Department of Fish and Game (ADF&G), and the Interagency Staff Committee (ISC) for review. The period during which comments are accepted is no less than 45 calendar days. Written comments must be submitted within this time frame.
3. The analysts gather information and develop an analysis on the proposal.
4. The analysis is sent to the Councils, ADF&G and the ISC for comments and recommendations to the Board. The public is welcome and encouraged to provide comments directly to the Councils and the Board at their meetings. The final analysis contains all of the comments and recommendations received by interested/affected parties. This packet of information is then presented to the Board for action.
5. The decision to adopt, adopt with modification, defer, or reject the proposal is then made by the Board. The public is provided the opportunity to provide comment directly to the Board prior to the Board's final decision.
6. The final rule is published in the Federal Register and a regulations booklet is created and distributed statewide and posted on the Program's website.

A step-by-step guide to submitting your proposal on www.regulations.gov:

1. Connect to www.regulations.gov – there is no password or username required.
2. In the white space provided at the top of the page, type in the document number listed in the news release or available on the program webpage, (for example: DOI-2024-0012) and select the "Search" button to the right.

3. Search results will populate and may have more than one result. Make sure the Proposed Rule you select is by the U.S. Department of the Interior (DOI) and **not** by the U.S. Forest Service (FS).
4. Select the proposed rule and in the upper right select the box that says, "Comment Now!"
5. Enter your comments in the "Comment" box.
6. Upload your files by selecting "Choose files" (this is optional).
7. Enter your first and last name in the spaces provided.
8. Select the appropriate checkbox stating whether you are providing the information directly or submitting on behalf of a third party.
9. Fill out the contact information in the drop-down section as requested.
10. Select, "Continue." You will be given an opportunity to review your submission.
11. If everything appears correct, click the box at the bottom that states, "I read and understand the statement above," and select the box, "Submit Comment." A receipt will be provided to you. Keep this as proof of submission.
12. If everything does not appear as you would like it to, select, "Edit" to make any necessary changes and then go through the previous step again to "Submit Comment."

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. Additional information on the Federal Subsistence Management Program may be found on the web at https://www.doi.gov/subsistence or by visiting www.facebook.com/subsistencealaska.

Alaska Board of Game
P.O. Box 115526
Juneau, AK 99811-5526
(907) 465-4110
https://www.boardofgame.adfg.alaska.gov

CALL FOR PROPOSALS

ALASKA BOARD OF GAME
2025/2026 MEETING CYCLE

The Alaska Board of Game calls for proposed changes to hunting and trapping regulations for the Southeast and Southcentral Regions.

PROPOSAL DEADLINE: THURSDAY, MAY 1, 2025

The Alaska Board of Game (board) is accepting proposed changes for hunting and trapping regulations for the Southeast Region (Game Management Units 1, 2, 3, 4, and 5) and the Southcentral Region (Game Management Units 6, 7, 8, 14C, and 15) including the following topics:

Hunting seasons and bag limits including subsistence and general hunts for all species; trapping seasons and bag limits; big game prey populations and objectives for intensive management; predation control areas implementation plans; restricted areas including controlled use areas, management areas, closed areas, and closures in state game refuges.

Proposed changes to 5 AAC Chapter 92, Statewide Provisions, specific to Game Management Units (GMUs) within the Southeast and Southcentral Regions will also be accepted, excluding changes to Game Management Unit Boundaries. This includes regulations under the categories of general provisions, permits, permit conditions and provisions, methods and means, possession and transportation, and the use of game. Proposed changes to these provisions must specify the applicable Game Management Units in order to be accepted.

The following topics will be considered for all Game Management Units:

Brown Bear Tag Fee Exemptions
Reauthorization of Antlerless Moose Hunts *(State statute requires all antlerless moose hunts be reauthorized annually.)*

Proposals may be submitted by mail, fax, or online:

Online: ***boardofgame.adfg.alaska.gov***

Mail: ADF&G, Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Fax: (907) 465-6094

Proposals must be received by Thursday, May 1, 2025, at the Boards Support Section office in Juneau. (A postmark is NOT sufficient for timely receipt).

You are encouraged to submit proposals at the earliest possible date on Board of Game proposal forms available from the Boards Support Section regional offices and on the website at: boardofgame.adfg.alaska.gov. All proposals must contain an individual's first and last name and an organizational name if appropriate, contact telephone number, and address. Please specify the applicable region or Game Management Unit on the proposal form.

The board encourages individuals or organizations to communicate and coordinate with others in the development of proposals. Local fish and game advisory committees (AC) are an excellent resource and the collective knowledge and experience within ACs may help improve proposals. Information about the 84 local fish and game advisory committees around the state is available at https://www.adfg.alaska.gov/index.cfm?adfg=process.advisory. You can also work with area staff from the Department of Fish and Game to better understand the current regulations, and what the effect(s) of your proposed change may be. Area staff contact information can be found on the ADF&G website at https://www.adfg.alaska.gov/index.cfm?adfg=contacts.main.

Providing clarity on the proposal form helps the board, advisory committees, and the public more fully understand the proposed regulatory changes. Proposals that are incomplete or unclear may be omitted from the proposal book. You are encouraged to contact the Boards Support Section staff if you have questions or need assistance with completing the proposal form. Proposals published in the proposal book will be referenced with the appropriate Alaska Administrative Code citation and include a brief description of the action requested. Proposals with emotionally charged language will be rejected or redacted as they detract from the substance of the proposal, may draw opposition not germane to the element(s) of the proposal, and may elicit nonresponsive charges from the public/board members. Proposals not meeting this call or submitted late will not be published.

Proposal books will be available to the advisory committees, agencies, and the public at boardofgame.adfg.alaska.gov for review and comment.

Proposals received per the above "Call for Proposals" deadline will be considered by the Board of Game at their Southeast Region meeting scheduled for January 23 – 27, 2027 in Wrangell, and Southcentral Region meeting scheduled for March 20 – 25, 2026 in Kodiak. For more information, please contact the ADF&G Boards Support Section at (907) 465-6098, or email kristy.tibbles@alaska.gov.

CALL FOR PROPOSALS
Alaska Board of Fisheries

THE ALASKA BOARD OF FISHERIES CALLS FOR PROPOSED CHANGES IN THE SUBSISTENCE, PERSONAL USE, SPORT, GUIDED SPORT, AND COMMERCIAL FISHING REGULATIONS FOR BRISTOL BAY FINFISH, ARCTIC / YUKON / KUSKOKWIM FINFISH, ALASKA PENINSULA / ALEUTIAN ISLANDS / CHIGNIK FINFISH AREAS, and STATEWIDE FINFISH AREAS.

PROPOSAL DEADLINE – THURSDAY, APRIL 10, 2025

The Alaska Board of Fisheries (board) is accepting proposed changes to the subsistence, personal use, sport, guided sport, and commercial fishing regulations for the Bristol Bay; Arctic, Yukon, Kuskokwim; Alaska Peninsula, Aleutian Islands, Chignik; and Statewide finfish management areas. Finfish includes salmon, herring, trout, other freshwater finfishes, and groundfish, including Pacific cod, for consideration by the board in its 2025–2026 meeting cycle. The board may also consider subsistence proposals for other topics (including other areas) under the subsistence proposal policy, 5 AAC 96.615, if proposals are submitted within this deadline and the board determines they meet the criteria in either 5 AAC 96.615(a)(1) or (2).

To ensure the proposal book is finished in advance of the board meetings, the board sets Thursday, April 10, 2025, as the proposal deadline.

Proposals may be submitted online, mail or fax at:

Online: http://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.forms

Mail: ADF&G, Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Fax: (907) 465-6094

Proposals must be received by Thursday, April 10, 2025 at the Boards Support Section office in Juneau. A postmark is NOT sufficient for timely receipt.

Interested parties are encouraged to submit proposals at the earliest possible date. The Board of Fisheries proposal form, including the on-line proposal form, is available at the Boards Support website, http://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.forms. Proposal forms are also available at any Boards Support office. Proposals must be submitted on the

current approved form. Any additional information provided with the form, such as pictures, tables, Internet web links, or charts/maps will not be included in the proposal book.

The completed proposal form must contain a contact telephone number and address. Email addresses are appreciated. Please print or type the individual's or organization's name as appropriate.

All proposals are reviewed prior to publication. Language that is emotionally charged detracts from the substance of the proposal and may draw opposition not germane to the element(s) of the proposal. Such language may be edited or deleted prior to publication. **Proposals that do not meet this call will not be accepted**. Proposals must pertain to the region, species, and uses in this call. Proposals that do not request a regulatory change or are outside the authority of the board will not be accepted. If duplicative proposals are received by the same individual or group only one will be included in the proposal book.

Proposals published in the proposal book will be referenced with the appropriate Alaska Administrative Code citation and include a brief description of the action requested.

Proposal books are sent to advisory committees and the public for review and comment. Proposals are online at http://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.proposalbook. Those submitting proposals are encouraged to review the proposal book at their earliest convenience to ensure proposals are included and accurate. Noted errors and omissions should be reported to Boards Support immediately. The public is encouraged to visit the Board of Fisheries website frequently for news and information regarding the upcoming cycle.

Responsive proposals received by the proposal deadline will be considered during the board's 2025/2026 meeting schedule.

For more information, please contact the Art Nelson, Executive Director for the Board of Fisheries at art.nelson@alaska.gov or (907) 267-2292.

Fall 2025 Regional Advisory Council Meeting Calendar

Last updated 10/25/2024

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
Sep. 14	*Sep. 15* ***Window Opens***	*Sep. 16*	*Sep. 17*	*Sep. 18*	*Sep. 19*	*Sep. 20*
			KARAC (Larsen Bay, Port Lions, or Kodiak)			
		NSRAC (Utqiagvik)				
Sep. 21	*Sep. 22*	*Sep. 23*	*Sep. 24*	*Sep. 25*	*Sep. 26*	*Sep. 27*
Sep. 28	*Sep. 29*	*Sep. 30*	*Oct. 1*	*Oct. 2*	*Oct. 3*	*Oct. 4*
Oct. 5	*Oct. 6*	*Oct. 7*	*Oct. 8*	*Oct. 9*	*Oct. 10*	*Oct. 111*
		WIRAC (Fairbanks, alt Huslia)				
			EIRAC (Tok)			
Oct. 12	*Oct. 13* ***Columbus Day Holiday***	*Oct. 14*	*Oct. 15*	*Oct. 16*	*Oct. 17*	*Oct. 18*
		SPRAC (Nome)				
		SCRAC (Anchorage)				
Oct. 19	*Oct. 20*	*Oct. 21*	*Oct. 22*	*Oct. 23*	*Oct. 24*	*Oct. 25*
		SEARAC (Wrangell)				
		YKDRAC (Anchorage or Bethel)				
Oct. 26	*Oct. 27*	*Oct. 28*	*Oct. 29*	*Oct. 30*	*Oct. 31* ***Window Closes***	*Nov. 1*
	NWARAC (Kotzebue)		**BBRAC** (Dillingham)			

Report on Recent Regulatory Body Actions

Federal Subsistence Board – Fisheries Regulatory Meeting – February 2025

Proposal	SRC Recommendation	Federal Subsistence Board Action
WP24-01: Allow sale of brown bear hides.	Support as written	April 2024: Defer February 2025: [OSM Conclusion: **Support** Proposal WP25-01 with **modification** that the hides of brown bears, with or without claws attached, may be purchased within the United States for personal use and not to be resold. The hunter must request an OSM Customary Trade Permit and must return the permit to OSM. Additionally, the modified regulation will align Federal sealing regulations with ADF&G sealing regulations.]
FP25-03a: Tolsona C&T for salmon in the Chitina Subdistrict.	Support	
FP25-03b: Tolsona C&T for freshwater fish in Upper Copper River drainage.	Took no action	
WP25-01: Nelchina caribou seasons, hunt management, and 804 analysis.	Support OSM modification	

Alaska Board of Fisheries – Prince William Sound Meeting – December 2024 and Southeast/Yakutat Meeting – January/February 2025

Proposal	SRC Recommendation	Board of Fisheries Action
Proposal 48: Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.	Oppose	Failed 3-4
Proposal 50: Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts.	Support	Failed 0-7

Proposal	SRC Recommendation	Board of Fisheries Action
Proposals 51, 52, and 53: Revise Copper River District Salmon Management Plan.	Support	Modified version of Proposal 51 passed 6-1. Instead of the NPS proposed decision rule, the substitute language delays the opening of the commercial fishery in the Copper River District until after May 21, delays the earliest possible opening date of the Chitina dipnet fishery from June 7 to June 10, and prohibits the taking of king salmon in the Chitina Subdistrict until July 1. No action was taken on Proposals 52 and 53 based on the action taken on Proposal 51.
Proposal 54: Restrict use of Copper River District inside closure area during statistical weeks 20 and 21.	Oppose	Failed 0-7
Proposal 70: Extend the lower boundary of the Chitina Subdistrict.	Oppose	Failed 0-7
Proposal 89: Increase the bag and possession limit for burbot in Lake Louise.	Support	Passed 6-0 with one absent
Proposal 90: Modify bag and possession limits of burbot in Crosswind Lake.	Oppose	Failed 0-6 with one absent
Proposal 170: Add waters closed to commercial fishing in Sudden Stream and Malaspina Lake.	Took no action	

Alaska Board of Game – Central and Southwest Region Meeting – January 2025

Proposal	SRC Recommendation	Board of Game Action
Proposals 4, 45, and 56: Establish archery-only hunts for sheep, moose, and goat in specified units including Units 11 and 13.	Oppose	Failed
Proposal 49: Eliminate the harvest of Nelchina caribou.	Support	Failed
Proposal 59: Lengthen the wolf trapping season in Unit 11. (SRC proposal)	Support	Failed
Proposal 60: Lengthen the coyote trapping season in Unit 11. (SRC proposal)	Support	Failed

WRANGELL-ST. ELIAS NATIONAL PARK AND PRESERVE
WILDLIFE REPORT UPDATE

Spring 2025

Kyle Cutting, Wildlife Biologist, kyle_cutting@nps.gov

- **Mentasta Caribou Herd**
  - A total of 189 (90% CI: 148-278) adult caribou were estimated during a survey on June 26 and July 3, 2024, which is the lowest estimate since 2017 (Table 1).
  - From a composition survey conducted on September 3rd, 2024, the calf to 100 cow ratio was similar to the previous 4 surveys since 2017 (4-year survey average = 21 calves vs. 2024 = 26 calves). The bull to 100 cow ratio was lower in 2024 (i.e., 33 bulls) than previous 4-surveys (average = 74 bulls).
  - Currently, a total of 28 GPS collars exists on Mentasta caribou captured on the Mentasta herds' range. Wintering Mentasta caribou are currently scattered across a large geographic area showing little congregation patterns on winter habitats.
  - A project will start in 2026 to evaluate changes in herd overlap among the Mentasta, Nelchina, and Chisana caribou herds. As these three herds co-occur in time, space, or both within Wrangell-St. Elias, significant concern exists for incidental take and overharvest of the smaller Mentasta and Chisana caribou herds when the larger Nelchina caribou herd is present and being harvested in an easily accessible area. The Federal hunt on Nelchina caribou is currently closed, so this actionable science will impact future management decisions. The study will begin in fall-2025 and will conclude in fall-2027.

Table 1. Survey results for the Mentasta caribou herd, Wrangell-St. Elias National Park & Preserve.

Year	Estimated Adults (90% CI)	Calf:Cow Ratio	Bull:Cow Ratio
2017	285 (237-385)	20	87
2018	349 (289-475)	22	92
2019	335 (277-459)	28	95
2020	642 (545-833)	-	-
2021	470 (388-629)	12	20
2023	258 (203-374)	-	-
2024	189 (148-278)	26	33

- **Chisana Caribou Herd**
  - A composition survey was conducted by Yukon Environment on October 13, 2024, and ADF&G on October 11, 2024, in conjunction with Wrangell-St. Elias. Survey results from fall-2024 indicate both high calf production (32 calves per 100 cows) and survival of bulls (44 bulls per 100 cows). The current 3-year (2022-2024) average during fall for both calves

(3-year average = 26) and bulls (3-year average = 44) is higher than the herd goals of 15 for calf:100-cow and 35 for bull:100-cow ratios.
  - 15 GPS collars were deployed in the Chisana herd in October of 2024, bringing the total number of GPS collared animals to 32.
  - A composition survey will be conducted in October 2025.
  - Additional collars will be deployed on the Chisana herd in fall 2025.

- **Moose**
  - The previous moose survey occurred across a 2.5-million-acre landscape within Wrangell-St. Elias including Unit 11 and portions of Unit 12 during fall-2023.
  - The estimated population of moose observed in 2023 was at a record low (Table 2), a nearly 40% decline from the previous 2013 survey, and slightly lower than the 2007 and 2010 estimates (Table 2).
  - Changes in the spatial distribution of total moose as determine through a spatial model indicates a sharp decline on the north side of the Wrangell Mountains since 2013. Moose on the west and south side of the Wrangell Mountains have showed less of a population decline.
  - We are currently exploring the role of record snow amounts (defined as snow water equivalent, kg/m^2) on moose declines across the survey area using satellite data on snow.
  - During 2025, analyses are underway to explore the influence of recent record snow amounts on recent declines of moose across the survey area

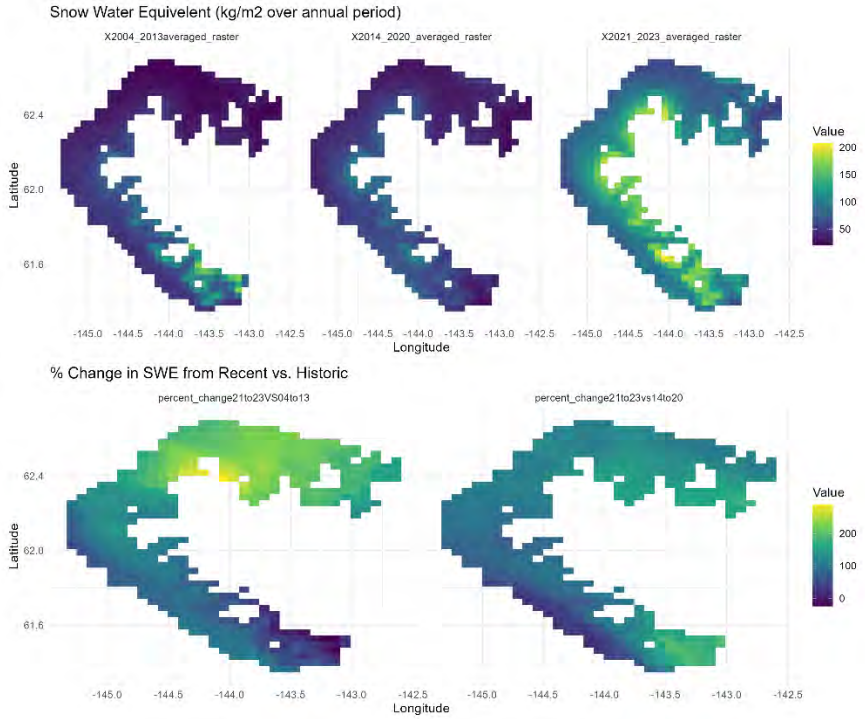


Figure 1. Snow water equivalent (SWE; kg/m^2, Daymet data) for the 2.5-million-acre moose survey area, Wrangell-St. Elias National Park & Preserve. Top panel of figures include average SWE across the following time periods: 2004-2013 (top left panel), 2014-2020 (top middle), and 2021-2023 (top right).

Bottom panels include percent change in SWE from the high snow years of 2021-2023 vs. 2004-2013 (bottom left) and 2021-2023 vs. 2014-2020 (bottom right).

Table 2. Survey results from four moose population surveys, Unit 11 and 12, Wrangell-St. Elias National Park & Preserve, Alaska.

Year	Population Count (90% CrI)	Calf:100 Cow	Bull:100 Cow
2007	1650 (1479-1820)	19	53
2010	1533 (1422-1670)	17	51
2013	2199 (1969-2451)	18	64
2023	1330 (1229-1442)	8	44

- **Dall's Sheep**
  - Sheep surveys were conducted across a 2.5-million-acre landscape on the northern Wrangell Mountains including the Nabesna area, and Mentasta and Nutzotin mountain ranges.
  - A total of 148 individual 10-mile long transects were flown by two aircraft across 6 days for a total of 48 hours of survey time. Sheep groups including age and gender were recorded.
  - Survey results indicate a slowing in the decline of adult sheep while lamb production increased slightly over the record low of 2023.
  - A project will start in fall-2025 to fall-2027 to evaluate factors contributing to the recent sheep decline at Wrangell-St. Elias. This project will occur across all occupied sheep habitats within the Wrangell-St. Elias starting in summers of 2026 and 2027. The project will use a strong south-to-north snow gradient across WRST to ask whether Dall's sheep declines are occurring park-wide at the same rate compared to a historic baseline, and to identify factors influencing sheep abundance in repeat surveys since 2011.
  - In 2025, NPS will resurvey the long-term monitoring area to evaluate recovery in that area, along with expand surveys into the southern side of the Wrangell Mountains.

Table 3. Survey results for Dall's sheep population surveys, northern Wrangell Mountains, Wrangell-St. Elias National Park and Preserve, Alaska.

Year	Adult Count (95% CrI)	Lamb Count (95% CrI)
2010	2414 (1976-3038)	549 (425-724)
2016	2962 (2344-3841)	620 (454-869)
2018	2074 (1803-2416)	131 (93-192)
2019	2281 (1993-2645)	727 (597-898)
2020	2620 (2297-3097)	580 (455-762)
2023	1221 (1040-1465)	19 (12-49)
2024	943 (783-1182)	153 (100-238)

United States Department of the Interior
NATIONAL PARK SERVICE
Wrangell-St. Elias National Park & Preserve
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Winter/Spring 2025 Fisheries Report

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SUMMARY OF KEY UPDATES

- The NPS Tanada Creek weir at Batzulnetas documented passage of 14,704 Sockeye Salmon and 13 Chinook Salmon (preliminary count estimates). A cooperative agreement has been drafted with intent to transfer the lead of future year (collaborative) weir operations to Ahtna Intertribal Resource Commission (AITRC)
- Inventory of harvestable freshwater fish in waters of Wrangell-St. Elias National Park and Preserve (WRST) is planned for the 2025 field season and led by Dan Gorze of AITRC
- Similar to recent years, the Copper River salmon run began in relatively low numbers during the start of the season, then increased in strength as the season progressed. Harvest opportunities continued throughout the 2024 season and the Sockeye Salmon sustainable escapement goal was achieved
- Miles Lake sonar estimated a season total passage of 946,188 salmon, which is 58% above the management objective of 599,157 salmon (through July 28)
- In-river run assessment of Chinook Salmon indicate an abundance that may not have met the minimum bound of the sustainable escapement goal range of 21,000 to 31,000 fish. The Alaska Department of Fish and Game (ADFG) closed all State Chinook Salmon fisheries of the Upper Copper River by mid-season
- No management actions were taken in Federal subsistence fisheries of the Copper River
- Upper Copper River Federal subsistence fishery permits; issued were: 202 Chitina Subdistrict, 293 Glennallen Subdistict, and 2 Batzulnetas permits
- Historical Federal subsistence harvests in the Upper Copper River through 2024 are provided in Tables 1-4 and Figure 3 displays historical harvests and in-river return estimates of salmon from 2005 through 2024
- Federal subsistence fishery in the Lower Copper River; 80 permits were issued, and total in-season reported harvest was 425 Sockeye Salmon and 2 Chinook Salmon
- Regulatory changes in State management plans for the Copper River District commercial fishery and Chitina personal use fishery will take effect in 2025. The commercial fishery will be delayed and may only open after May 21. The Chitina personal use fishery may open June 10 or later and will be closed to Chinook Salmon harvest until after June 30
- ADFG has forecast 2025 Copper River total run returns of 2,638,000 Sockeye Salmon (50% above 10-yr. average) and 36,000 Chinook Salmon (25% below 10-yr. average)

Tanada Creek Salmon Weir, 2024

FISHERIES RESEARCH AND MONITORING PROJECTS

Tanada Creek Salmon Weir

The WRST Fisheries Program operated the Tanada Creek salmon weir located at Batzulnetas (funded through the Fisheries Resource Monitoring Program (FRMP)). Weir installation was completed on June 25. The first salmon was documented passing the weir on June 26 and a total of 14,704 Sockeye Salmon and 13 Chinook Salmon recorded in passage for the season. The season count is below the historical average of approximately 18,000 fish. The weir operated through September 25.

Staff of AITRC were again invited to participate in the project during the season and their Fish Biologist Dan Gorze assisted with the installation and removal of the weir. This provided an opportunity to continue building on transferring knowledge of project operations to AITRC, who has expressed interest in taking over the project in future years. A draft cooperative agreement is under review and includes AITRC as a co-investigator beginning in the 2025 season.

Inventory of Harvestable Fish

The NPS Inventory and Monitoring Program is providing funds to AITRC to lead a project to document the presence, distribution, and condition of harvestable freshwater fish species in select waters of the park and preserve. This project is a collaborative effort with staff of the WRST Fisheries Program. Target sites will emphasize both lakes and flowing waters most readily accessible (near or along road or river corridors) and which have existing or potential interest for both subsistence harvest and recreational fishing opportunities. We anticipate much of the sampling effort will concentrate in the Nabesna Road area.

UPPER COPPER RIVER FISHERIES

2024 Copper River Salmon Run Strength and Management Actions

The 2024 Copper River salmon run began in low numbers relative to the date in season. The return then increased in strength as the season progressed. A similar pattern of delayed run timing for these stocks has been observed 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.

Commercial fishing opportunities in the Copper River District were limited during the early season in response to low numbers of returning salmon at the start of the season. As the run developed, fishing opportunities were expanded. The season total commercial harvest for the Copper River District through August 13 was reported to include 1,400,000 Sockeye Salmon and 8,871 Chinook Salmon

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 946,188 salmon were estimated in migration upstream for the season. The season passage estimate is 58% above the July 28 management objective of 599,157 salmon.

Figure 1. 2024 Copper River Salmon Daily Passage at Miles Lake Sonar

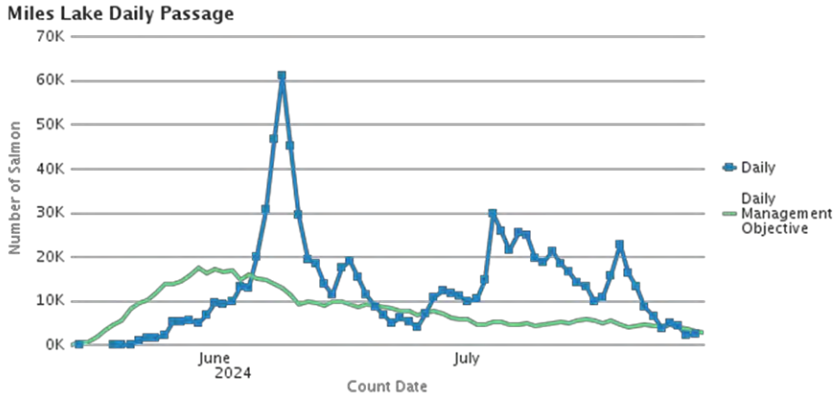
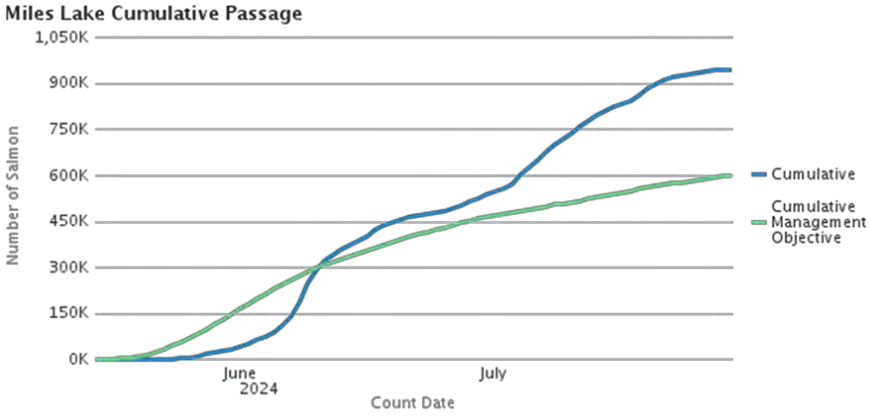


Figure 2. 2024 Copper River Salmon Cumulative Passage at Miles Lake Sonar



*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 contrast to the high sonar estimates, assessments of the numbers of Chinook Salmon in-river indicate a weak return that may not have met the sustainable escapement goal for the season. In response to the in-season assessment, the ADFG closed all State fisheries of the Upper Copper River drainage to Chinook Salmon harvest, including catch and release in sport fisheries and the State subsistence fishery of the Glennallen Subdistrict. All State users were required to closely attend fish wheels being operated so Chinook Salmon could be immediately released.

Regarding the in-river Chinook Salmon estimate, the Native Village of Eyak (NVE) investigator provided a point estimate of 21,069 fish which would not meet the escapement goal after accounting for in-river harvest. However, it was noted that a low sample size in the study resulted in a standard error (SE = 5,984) and confidence interval (95% CI = 9,340–32,797) which are both below study objectives.

These restrictions did affect those fishing under Federal subsistence regulations. After careful consideration and consultation no Federal Special Action was issued by the in-season manager to restrict harvest Chinook Salmon harvest in fisheries of the Copper River Drainage.

Although Federal actions were not taken, WRST prepared and distributed advisory announcements to inform all subsistence users of the concerns for Copper River Chinook Salmon. The announcement strongly recommended that users release healthy Chinook Salmon from all gear types.

2024 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. WRST issued 203 Chitina Subdistrict permits, 293 Glennallen Subdistrict permits, and 2 Batzulnetas permits. Tables 1 through 4 show historical reported and expanded harvests for the Federal subsistence fisheries in each subdistrict through the 2024 season. Figure 3 shows Upper Copper River Federal subsistence harvest and total in-river salmon estimates for the 20-year period of 2005-2024, along with linear trend lines.

2024 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. There were 80 permits issued through the OSM database. A total of 425 Sockeye Salmon and 2 Chinook Salmon were reported in harvest during the season.

2025 Recent State Regulatory Actions Affecting Copper River Salmon Fisheries

During the December 2024 meeting of the Alaska Board of Fisheries (BOF) in Cordova, regulatory changes were made to the Copper River District Salmon Management Plan and the Copper River Personal Use Dip Net Salmon Fishery Management Plan; both changes affect State salmon fisheries of the Copper River and may allow more early run fish to make it to upriver spawning tributaries and harvest locations.

Proposal 51 was submitted by WRST to address concerns of disproportionately high harvest of early run salmon stocks in the commercial fishery. Two similar proposals addressed this same concern (Proposal 52 submitted by AITRC and Proposal 53 submitted by the Copper Basin Advisory Committee). Proposals 52 and 53 were not addressed; however, in deliberating Proposal 51, the BOF Chair submitted substitute language found in Record Copy 122 (RC122) with a stated priority goal to maintain Chinook Salmon escapement in the Copper River. Included in RC122 are changes to both the Copper River District commercial fishery and the Chitina Subdistrict personal use fishery. Proposal 51 as amended by RC122 was adopted to regulation. The commercial fishery now may only open after May 21, which will be a delay from previously being allowed to open after May 14. For the Chitina personal use fishery, Chinook Salmon harvest will not be allowed during the month of June and instead of the season being mandated to open between June 7 and 15 based on sonar passage, it now may only open June 10 or later, with no date specified for a delayed opening.

Proposal 59, submitted by ADFG, was adopted and amends the Copper River Personal Use Dip Net Salmon Management Plan to allow an increase in the Sockeye Salmon annual harvest limits when the upper bound sustainable escapement goal is projected to be exceeded. This provides ADFG with a management tool for avoiding potential over escapement.

2025 Preseason Copper River Salmon Forecast

ADFG has forecast a Copper River Sockeye Salmon 2025 total return of 2,638,000 fish, which is 50% above the recent 10-year average return of 1,757,000 fish. The 2025 forecast Chinook Salmon return is 36,000 fish, which is 25% below the recent 10-year average of 48,000 fish.

2025 Early Season Management Strategy for Federal Subsistence Fisheries

Unless in-season run assessments prompt concerns of meeting salmon escapement goals, we anticipate all Federal subsistence salmon fisheries of the Upper Copper River to be open from May 15 through September 30.

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					
ar	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	21,566	561	1	0	21	22,150						
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 **1/14/2025**. 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	78.8	13,827	17,538	367	466	0	0	0	0	16	20	18,024
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

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[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	84.7	3,342	3,948	81	96	1	1	0	0	0	0	4,045
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

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[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]
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 **1/14/2025**. 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.

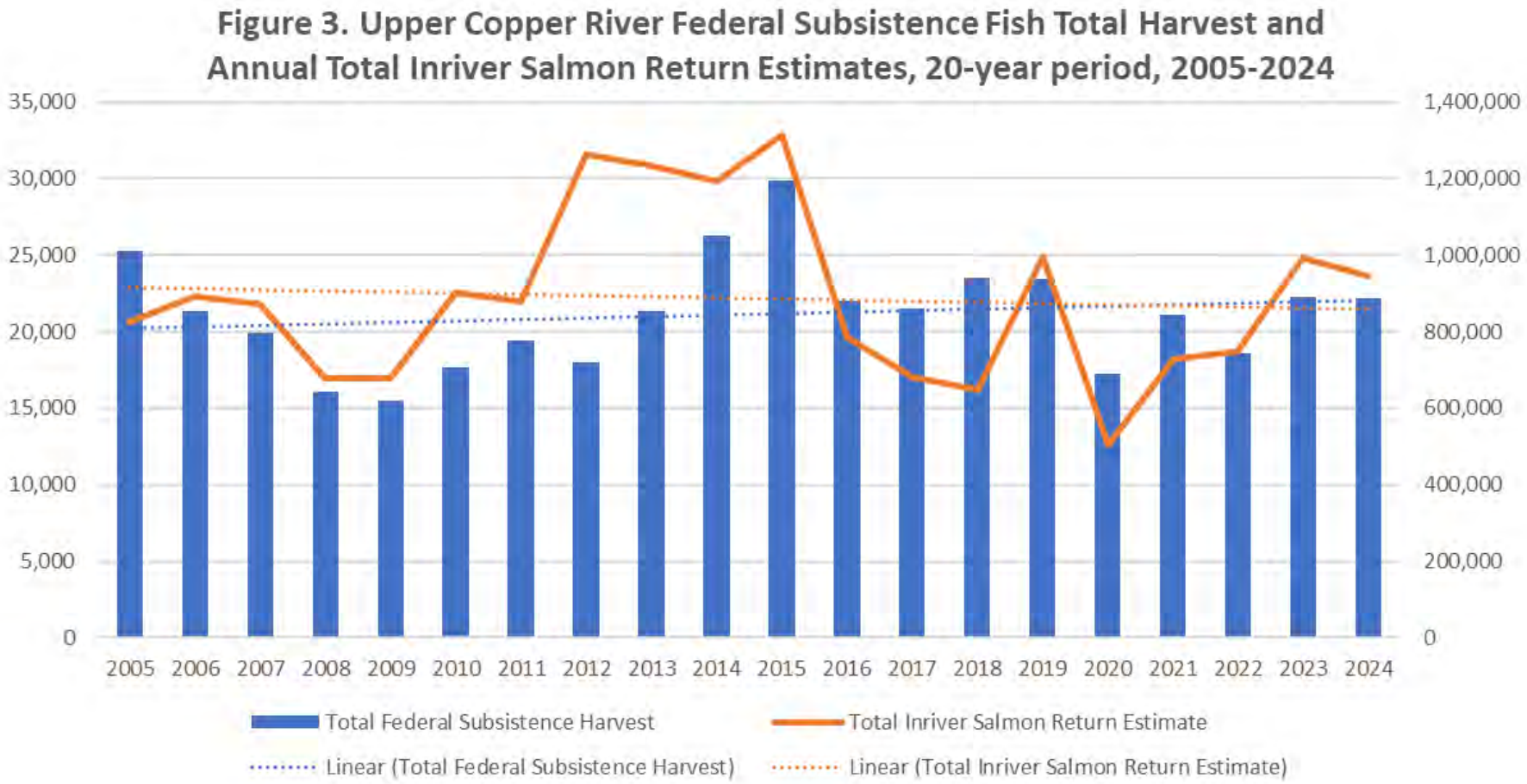
Figure 3. Upper Copper River Federal Subsistence Fish Total Harvest and Annual Total Inriver Salmon Return Estimates, 20-year period, 2005-2024
35,000
30,000
25,000
20,000
15,000
10,000
5,000
0
1,400,000
1,200,000
1,000,000
800,000
600,000
400,000
200,000
0
2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024
Total Federal Subsistence Harvest
Total Inriver Salmon Return Estimate
Linear (Total Federal Subsistence Harvest)
Linear (Total Inriver Salmon Return Estimate)

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

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Federal subsistence harvest reports for Wrangell-St. Elias in 2024

In 2024, Wrangell-St. Elias and Tetlin National Wildlife Refuge staff issued a total of 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 (FM1106). A total of 144 permits were issued for this hunt in 2024, 56 people hunted, and 13 moose were harvested. (See Table 1 for additional details).

Wrangell St. Elias and the Alaska Department for Fish and Game both issue a joint state/federal permit (RM291) for the moose hunt for portions of Unit 11 and 12 in the northern part of the park. For the 2024 season, a total of 274 permits were issued, 162 people hunted (90 federally qualified subsistence users), and 14 moose were harvested—a majority by federally qualified subsistence users.

Ahtna and Wrangell-St. Elias National Park and Preserve: An Ethnographic Overview and Assessment now available

This overview of Alaska Native history and culture in the Ahtna Region of eastern interior Alaska focuses on the Ahtna communities associated with Wrangell-St. Elias National Park and Preserve. It is based existing ethnographic and historical sources along with information from the authors' own fieldwork and describes Ahtna culture as it existed in the late nineteenth and early twentieth centuries. It also examines the longstanding relationships of Ahtna to lands in and near the park, primarily in the northern part of the Copper River Basin.

Ahtna and Wrangell-St. Elias National Park and Preserve was written by William E. Simeone and Odin T.W. Miller and is the result of collaboration between Wrangell-St. Elias National Park and Preserve and the Ahtna Intertribal Resource Commission. This project was completed in November 2024, and the report is available for download 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."

Table 1. Federal Subsistence Registration Permits in Wrangell-St. Elias NPP, 2014-2024

Unit 11 Goat (FG1101)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	31	29	22	26	30	27	27	20	8	6	23
Individuals Hunting	10	6	4	3	8	8	4	2	1	2	1
Animals Harvested	0	0	0	0	0	1	0	0	0	0	0
Success Rate (%)	0.0	0.0	0.0	0.0	0.0	12.5	0.0	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)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	123	128	138	132	144	107	156	140	139	140	144
Individuals Hunting	70	70	75	72	85	45	68	71	66	59	56
Animals Harvested	10	13	16	13	12	10	15	11	15	10	13
Success Rate (%)	14.3	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)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	32	17	20	14	11	8	8	7	10	21	13
Individuals Hunting	3	3	4	4	2	2	1	2	4	4	1
Animals Harvested	0	0	1	0	0	0	1	0	1	1	1
Success Rate (%)	0.0	0.0	25.0	0.0	0.0	0.0	100.0	0.0	25.0	25.0	100.0

Unit 11 Elder Sheep (FS1104)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	25	25	32	34	38	34	38	26	25	22	30
Individuals Hunting	10	8	12	13	18	14	12	12	10	11	10
Animals Harvested	1	3	3	4	1	1	1	3	2	3	4
Success Rate (%)	10.0	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)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	0	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)

	2014	2015	2016	2017	2018	2019	2020	2021	2022**	2023	2024*
Permits Issued	11	11	8	8	6	4	7	5	n/a	6	8
Individuals Hunting	8	7	8	3	3	3	4	1	n/a	5	4
Animals Harvested	2	0	1	0	2	1	3	0	n/a	2	2
Success Rate (%)	25.0	0.0	12.5	0.0	66.7	33.3	75.0	0.0	n/a	40.0	50.0

** Closed in 2022 due to conservation concerns.

Table 1. Federal Subsistence Registration Permits in Wrangell-St. Elias NPP, 2014-2024 (cont.)

Unit 12 Elder Sheep (FS1201)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	9	7	11	12	14	14	12	13	8	11	9
Individuals Hunting	5	3	6	4	8	6	4	6	4	5	1
Animals Harvested	1	0	1	1	0	0	1	0	0	0	0
Success Rate (%)	20.0	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)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	0	0	0	0	0	0	0	0	1	1	1
Individuals Hunting	-	-	-	-	-	-	-	-	0	0	0
Animals Harvested	-	-	-	-	-	-	-	-	-	-	-
Success Rate (%)	-	-	-	-	-	-	-	-	-	-	-

Source: Federal Subsistence Permit Database.
* 2024 data are as of 1/13/2025.
Note: Success rate is calculated based on the number of individuals hunting, not total permits issued.

Table 2. Joint State-Federal Permits for the Fall Moose Hunt in Portions of Units 11 and 12 (RM291), 2014-2024

All Hunters

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	246	250	277	244	250	277	314	282	340	297	274
Individuals Hunting	191	142	179	145	155	158	187	162	197	153	162
Animals Harvested	20	20	23	19	23	21	27	24	16	10	14
Unit 11 Harvest	11	9	17	15	17	14	12	16	12	5	10
Unit 12 Harvest	9	11	6	4	6	7	15	8	4	5	4
Success Rate (%)	10.5	14.1	12.8	13.1	14.8	13.3	14.4	14.8	8.1	6.5	8.6

Federally Qualified Subsistence Users

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024*
Permits Issued	154	168	176	155	171	173	173	167	175	169	154
Individuals Hunting	92	89	106	88	108	102	107	93	88	72	90
Animals Harvested	15	14	18	15	19	21	14	16	10	10	10
Success Rate (%)	16.3	15.7	17.0	17.0	17.6	20.6	13.1	17.2	11.4	13.9	11.1

Source: Email from ADF&G Tok on 1/09/2025
* 2024 data are as of 1/09/2025.
Note: Success rate is calculated based on the number of individuals hunting, not total permits issued. Data for Federally Qualified Subsistence Users excludes records with ambiguous residency (e.g., urban mailing address and rural resident community or local mailing address and non-local resident community).

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, 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 have been working on a technical paper, which is scheduled for completion in fall 2025.

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. The data are currently being reviewed, and a summary report will be written. Funding for this work comes from the NPS Alaska Subsistence Advisory Council and Alaska Geographic.

Outer Coast Ethnographic Landscape Study: Beginning in 2025, a team of cultural anthropologists plus an archeologist will work closely with Eyak and Tlingit knowledge holders to gather information to complete an Ethnographic Landscape Study focusing on lands along the park's coastline to be used as baseline documentation for park management for coastal resources at risk of being lost due to climate warming and glacial melt. In addition to NPS staff and tribal partners, we anticipate working with Doug Deur, Portland State University, and possibly Thomas Thornton, University of Alaska Southeast and National Academy of Sciences.

Copper River Salmon In-Season Teleconferences: During summer 2024, weekly teleconferences hosted by the Ahtna Intertribal Resource Commission (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 2025, 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 the Ahtna Intertribal Resource Commission and is currently in the planning stages.

Report updated 1/13/2025

Ahtna Intertribal Resource Commission Report

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The Ahtna Intertribal Resource Commission (AITRC) remains deeply engaged in scientific research, securing funding for future initiatives, and collaborating with other organizations on Game Management Units 11 and 13 projects.

Our work goes beyond fish and wildlife conservation. We are actively mapping our customary and traditional use territory, establishing a Tribal Historic Preservation Office, and developing apps to track the distribution of individual subsistence harvests. Our primary goal is to bridge data gaps and enhance the management of subsistence species that the eight federally recognized tribes and their citizens in the Ahtna Region have relied on since time immemorial. By doing so, we aim to strengthen co-management efforts with partnering agencies.

Wildlife-

Mentasta Caribou Research- AITRC, in partnership with the Cheesh'na Tribal Council, received funding from USFWS through the Tribal Wildlife Grant (TWG) to assist WRST in their already established Mentasta Caribou Herd Monitoring. The capture and collaring of the Mentasta and Chisana Caribou Herds was conducted in the first week of October. AITRC will contribute GPS collars, flight time, and equipment (ultrasound and thermal cameras) as needed. In addition, AITRC has requested samples from historic and upcoming captured caribou to conduct nutritional analysis and disease testing, an expansion of the Moose Health initiative that AITRC's Ecologist has been working on over the last couple of years. Based on capture success rates and winter survival, AITRC will transition to research calving and recruitment rates in spring/ summer 2025. As we have funding through December 2025, AITRC will submit research permits to be the lead PI of this project to the Institutional Animal Care and Use Committee (IACUC).

Wolf Research- AITRC, in partnership with the Native Village of Tazlina, received funding from USFWS through the TWG to research the range, distribution, and seasonal diet of wolf packs within GMU 11. Wolf captures occurred in November 2024 and again in March 2025. Through this research, AITRC will initially focus on the area between the Sanford River and the Nebesna River, with approval to conduct research within NPS boundaries north of McCarthy Road. This is an AITRC-led project with an approved IACUC through NPS and research permits from NPS, ADFG, and Ahtna Inc. Once adequate snowfall is available, two AITRC technicians will conduct site investigations of clustered GPS points to collect biological samples and set up trail cameras at potential kill-sites, rendezvous sites, and denning sites via

snowmobiles and aircraft. In addition, AITRC is working with local trappers to collect supplemental biological samples to better understand the diet throughout Ahtna's Eastern Territory. This funding will continue through December 2025, and after the preliminary analysis is complete, additional funding may be pursued, focusing on insights from the ongoing wolf research.

Lastly, through the TWG funding, AITRC requested that WRST and AITRC establish a data-sharing agreement for NPS-collared caribou, AITRC-collared caribou, and wolves. This would allow for a more holistic understanding of the two species.

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. This ongoing research aims to monitor parasites such as *Ichthyophonus* and Anisakis species, among others, for better planning and proactive mitigation rather than scrambling to react. It also seeks to identify any diseases or stress in Copper River salmon.

Ichthyophonus can cause mortality in salmon and affect the quality of fillets, presenting a significant food security concern, though it does not pose a direct human health risk. Anecdotal reports of symptoms of this pathogen from Tribal Citizens have been an important motivator for the project. Given that *Ichthyophonus* is suspected as a potential contributor to the declining Yukon salmon (In 2021, 44% of Chinook salmon returning to the Yukon to spawn were infected with *Ichthyophonus*, which was higher than in previous years. In 2022, preliminary results from testing 2022 Chinook indicated a high prevalence of *Ichthyophonus* at around 40%.) returns, proactive monitoring of Copper River sockeye and Chinook salmon is essential.

In 2023, AITRC collected 148 samples to analyze parasite burden and *Ichthyophonus* presence, and 75 cultures (64 sockeyes and 11 Chinook salmon) were sent to the ADFG Pathology Laboratory for testing. One sample returned a positive result for *Ichthyophonus*, but due to contamination—a common issue during field sampling—it cannot be confirmed with 100% certainty. Samples were collected for both culture and histology. None of the 2022 histology samples showed signs of *Ichthyophonus*. However, the histology of the 2023 samples revealed inflammation lesions and myocyte cell death in some samples. Inflammation and myocyte cell death in salmon hearts are signs of stress and disease that could significantly impair their survival and reproductive success. It's essential to investigate the underlying causes to understand their potential impact on fish populations and food security.

In 2024, AITRC partnered with ADFG Pathology Lab and Sitka Sound Science Center on this project and expanded the sampling scope to include kidney, liver, and spleen from Chinook and sockeye salmon. This

more holistic approach utilized both PCR and histology to examine different diseases. This more holistic approach should provide deeper insights into disease dynamics in Copper River salmon. There are currently no results.

Moose Health Monitoring Project

The Ahtna Intertribal Resource Commission entered year three of the Moose Health Monitoring Program, initiated in response to Tribal Citizens' concerns about meat quality and health risks. Focusing on environmental contaminants from historical mining operations and military dump sites in Ahtna territory, the project aims to ensure that subsistence resources are safe for consumption.

Sample Collection: In 2022, we collected eight samples, followed by 33 in 2023 and 41 in 2024. To diversify research opportunities, samples are sourced from hunter harvest, roadkill, educational, or ceremonial take.

Preliminary Findings:

Mercury: No high mercury levels were found in samples from 2022 and 2023.

Copper is an essential trace element for all living organisms, including moose. It is critical in enzymatic activities, immune function, connective tissue formation, and iron metabolism. In Alaska, copper deficiency in moose is a concern, often linked to poor soil quality or competition with other metals, such as high iron or molybdenum, which can inhibit copper absorption. Copper deficiency in moose can weaken immunity, making them more susceptible to diseases and parasites. It can also cause poor growth, fertility issues, and developmental abnormalities such as bone and connective tissue disorders. While copper is essential, it can also become toxic at high concentrations. Copper toxicity may lead to liver damage and interfere with other metabolic functions. However, the primary issue in Alaska is deficiency rather than excess, particularly in regions where soil copper availability is naturally low.

- Hair: Among 24 moose samples analyzed for copper, only one showed an adequate level, while 95.8% were deficient or inadequate. Hair analysis reflects only the period of growth, which limits its utility as an indicator.
- Kidney: Copper levels were well below the adequate range defined by existing studies.
- Liver: Out of 39 samples, 14 showed copper below the minimum threshold, and values varied greatly. Additional analysis is needed to explore drivers such as location, season, or moose age.
- Muscle: Muscle tissue generally has copper concentrations below the criteria, though muscle may not be a reliable indicator of copper status. However, it remains an essential nutritional source for human consumers.

Cadmium is a non-essential heavy metal that poses a toxicological threat to wildlife. In Alaska, cadmium contamination is often linked to historical and ongoing mining activities and pollution from other industrial sources. Cadmium can accumulate in soils and be taken up by plants, which are subsequently consumed by herbivores like moose. In moose, cadmium accumulates primarily in the kidneys and, to a lesser extent, in the liver. Chronic exposure leads to the gradual buildup of cadmium over time, which can

eventually reach harmful levels. The range of cadmium concentrations observed in moose kidneys is vast, with significant overlap between normal and concerning levels, indicating exposure variability based on location and environmental factors. High levels of cadmium in moose can cause kidney damage, impairing the organ's ability to filter waste effectively. It can also disrupt calcium metabolism, weaken bones, and cause other physiological issues. Cadmium toxicity can reduce moose's health and survival rates, particularly in areas with significant environmental contamination. Sublethal effects may weaken moose, impairing their ability to find food, escape predators, and cope with harsh environmental conditions.

- Kidney: Showed a wide range (almost 100-fold difference) in cadmium levels, spanning both normal and concerning concentrations.

An Ahtna tribal citizen is analyzing the University of Alaska Fairbanks and Texas A&M as part of her master's thesis. These data are preliminary, and the final findings will be published in a thesis and/or peer-reviewed manuscript highlighting significant drivers of heavy metal accumulation.

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 collected samples.

Fisheries-

Water temperature monitoring- As part of the state-wide stream monitoring program, AITRC deployed remote temperature loggers in the major tributaries to the Copper River and other feeder streams. As ambient summer temperatures significantly affect non-glacial stream temperatures, emphasis was placed on the Gulkana River system. Partnered with USFWS, AITRC helped collect data from 121 remote sensors in the Middle and West Fork Gulkana. An MOU is in place for AITRC to take over this project.

Tanada Weir - AITRC Fisheries Biologist, is beginning the hiring process and will assume responsibility for operations in 2025.

Juvenile salmon abundance—In partnership with Prince William Sound Science Center, in 2024, AITRC conducted year three of hydroacoustic surveys in Klutina Lake to assess Juvenile sockeye abundance. A pilot study verified target species via trawl. Future funding is pending.

Klutina River Escapement Estimate using Sonar - At this writing, AITRC is awaiting a decision on funding for 2025.

NPS-WRST Inventory of Freshwater Fish—Beginning this field season, AITRC will begin an inventory of harvestable freshwater fish in Wrangell St-Elias National Park's lakes and streams.

Anthropology-

Community Household Surveys—This is a multi-year study on how residents of Mentasta Lake, Mentasta Pass, Chistochina, Slana, and Nebesna Road participate in subsistence. Surveys, data analysis, and community reviews have been completed. The feedback gained during the community data review is being incorporated into the results, and the partners are writing a report, which will be completed by 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 will conduct 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 to fill the data gap between harvest assessments, potentially transforming into a systematic data collection method like the comprehensive harvest assessment. The analysis of the interviews and the development of the methodology will be presented in an extensive report.

Ahtna Cultural Preservation Capacity Building Project- We are building our capacity to provide Tribal Historic Preservation Office services to the Native Village of Chitina and, eventually, the other Ahtna Tribes. In September of 2023, there was a discovery of graves within the right-of-way of the O'Brien Creek trail. This led to AITRC participating in discussions between the Native Village of Chitina and the Alaska Department of Transportation to devise a temporary solution: installing bridges and boardwalks to protect these graves while allowing people to access the personal fishery. Last fall, AITRC, through an Archeological Consulting Firm, conducted further research in the O'Brien Creek area. AITRC continues to collect ethnographic and archeological data to catalog and compile an inventory of culturally sensitive sites.

AITRC plans future cultural management activities, including monitoring DOT work in the Tonsina area this summer. With this information and working closely with the state of Alaska and the tribe, AITRC has been making headway in fulfilling the Native Village of Chitina's vision for protecting these important cultural sites.

NPS Ethnography- Ahtna and Wrangell-St. Elias National Park and Preserve: An Ethnographic Overview and Assessment has been published.

Indigenous Sentinel Network-

Harvest & Subsistence Sharing Apps - AITRC has been working diligently with the Indigenous Sentinels Network (ISN) and the Open Landscape Network (OLN) to design and develop two mobile applications: the Harvest App and the Subsistence Sharing App. These apps are built upon AITRC's authorization to administer federal community subsistence hunts for moose and caribou on federal public lands open to federal subsistence uses. The apps will capture data on harvesting successful catches/hunts and sharing the harvests with family, friends, and other community members, near and far.

These apps have multiple benefits: Harvest App - allows users to report their harvest by filling out the form on their phone and printing it out later for submission, instead of pulling out a writing utensil and filling out the form itself while in the bush. Sharing App - sharing and bartering are standard practices in traditional subsistence lifestyles. The app will allow users to see various maps and diagrams of the extent of their sharing. The resulting data collected from the sharing app will also provide invaluable information to AITRC when advocating for subsistence rights. These two apps will also communicate with each other, sending harvest data to their pantry in the sharing app if the user wishes to do so.

The primary short-term goal is to have both apps fully functional and available to our tribal communities by the start of the fishing season 2025. The long-term and ultimate goal is to allow tribal communities from all over Alaska to utilize these apps, ease the reporting process, and obtain quantitative data that can be used in proposals, public comments, and any other data-driven decision-making processes.

Wrangell-St. Elias Subsistence Resource Commission
February 25-26, 2025, Copper Center

Bureau of Land Management, Glennallen Field Office Agency Report

Caroline Ketron, Anthropologist/Subsistence Coordinator
Tessa Wittman, Wildlife Biologist

General Updates

- Staffing updates: Alysia Hancock is now in detail as Field Manager of the Bureau of Land Management Glennallen Field Office (BLM GFO). Tessa Wittman is Wildlife Biologist (Acting), and Neil Perry is our new Assistant Field Manager for Resources.
- BLM GFO continues to work with Alaska Department of Fish and Game (ADF&G) to monitor subsistence resource populations among BLM and State lands within Game Management Unit 13 (GMU13).
- The BLM Glennallen Field Office has supported Emergency Special Action Requests for the Federal Subsistence Board (FSB) to close federal Nelchina hunts in Units 11, 12, and 13 for 2023 and for 2024/25, for conservation reasons.
- FSB action on WSA 24-06 closed Federal public lands to State moose hunters in Unit 13B this season through June 30, 2026.
- Updates on the status of the Delegation of Authority to the GFO Field Manager for the FC1302 caribou hunt will be given at the meeting pending the FSB decision on Wildlife Proposal 25-01.
- The BLM Glennallen Field Office continues to work with AITRC's Community Harvest System.

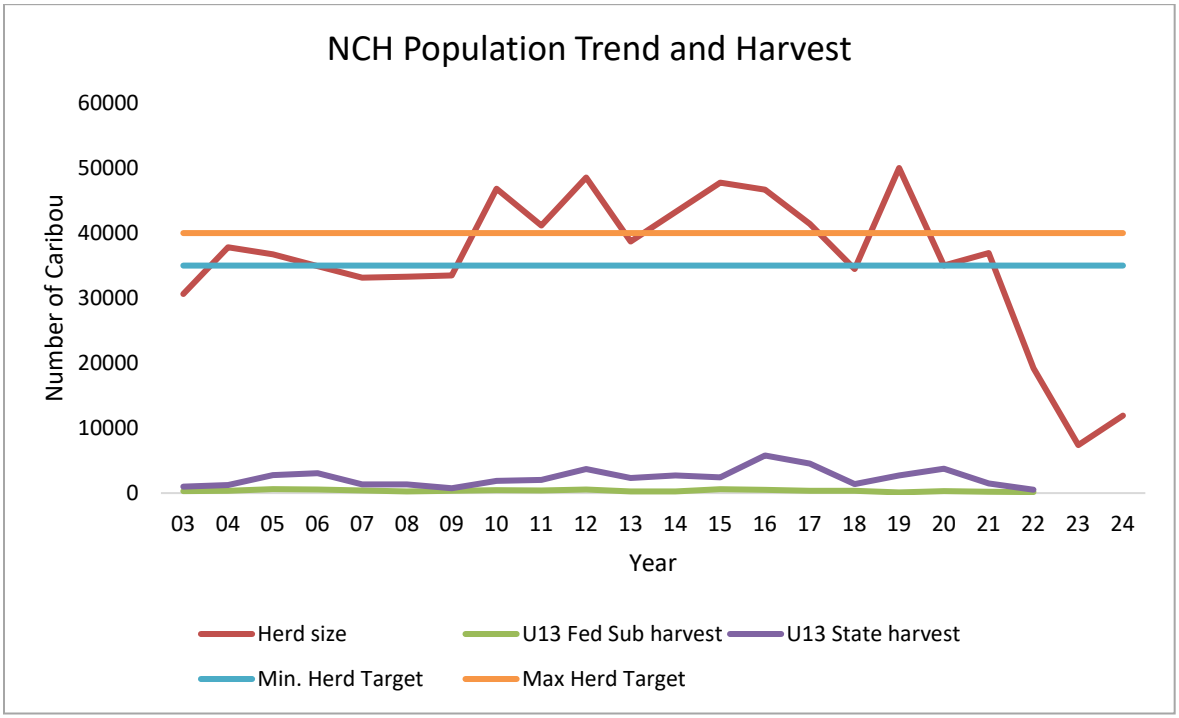
Subsistence Permitting Updates

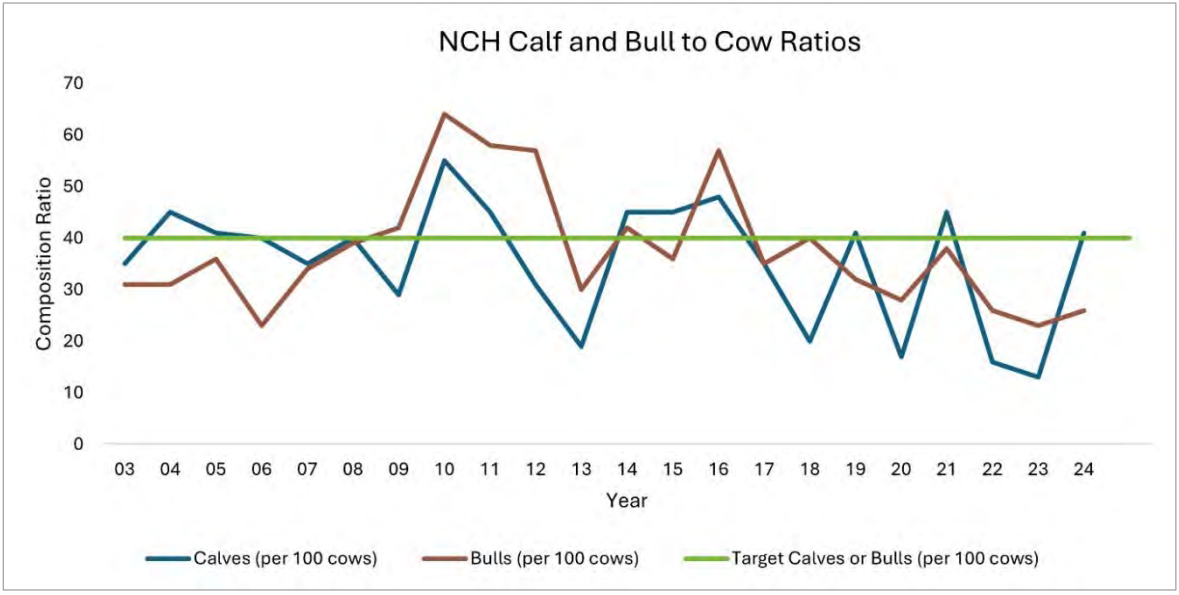
- The GFO issued 2024 GMU13 federal moose and designated hunter permits from the Glennallen Field Office location and for 3 days in Delta Junction. Hunters must get permits in person, demonstrate Alaska and rural residency, and have a current Alaska resident hunting license.
- The online reporting function of the permit database was not working this year and GFO fielded hundreds of calls from hunters and created extra public outreach materials. Due to the extra effort from GFO staff, we still achieved close to 90% hunt reports returned.

Wildlife Updates

The BLM received updates on caribou and moose populations from the ADF&G:

- Moose numbers were slightly up from last year in most of GMU 13.
- The fall 2024 survey data showed the Nelchina (NCH) caribou herd at around 12,000 animals with 41 calves per 100 cows and 26 bulls per 100 cows, compared to 2023, when ADFG reported a minimum herd size of 7,384 with 13 calves per 100 cows and 23 bulls per 100 cows.





Population data sourced from ADFG reports at: https://www.adfg.alaska.gov/index.cfm?adfg=librarypublications.wildlifemanagement#caribou

FEDERAL SUBSISTENCE MOOSE HARVEST GMU 13

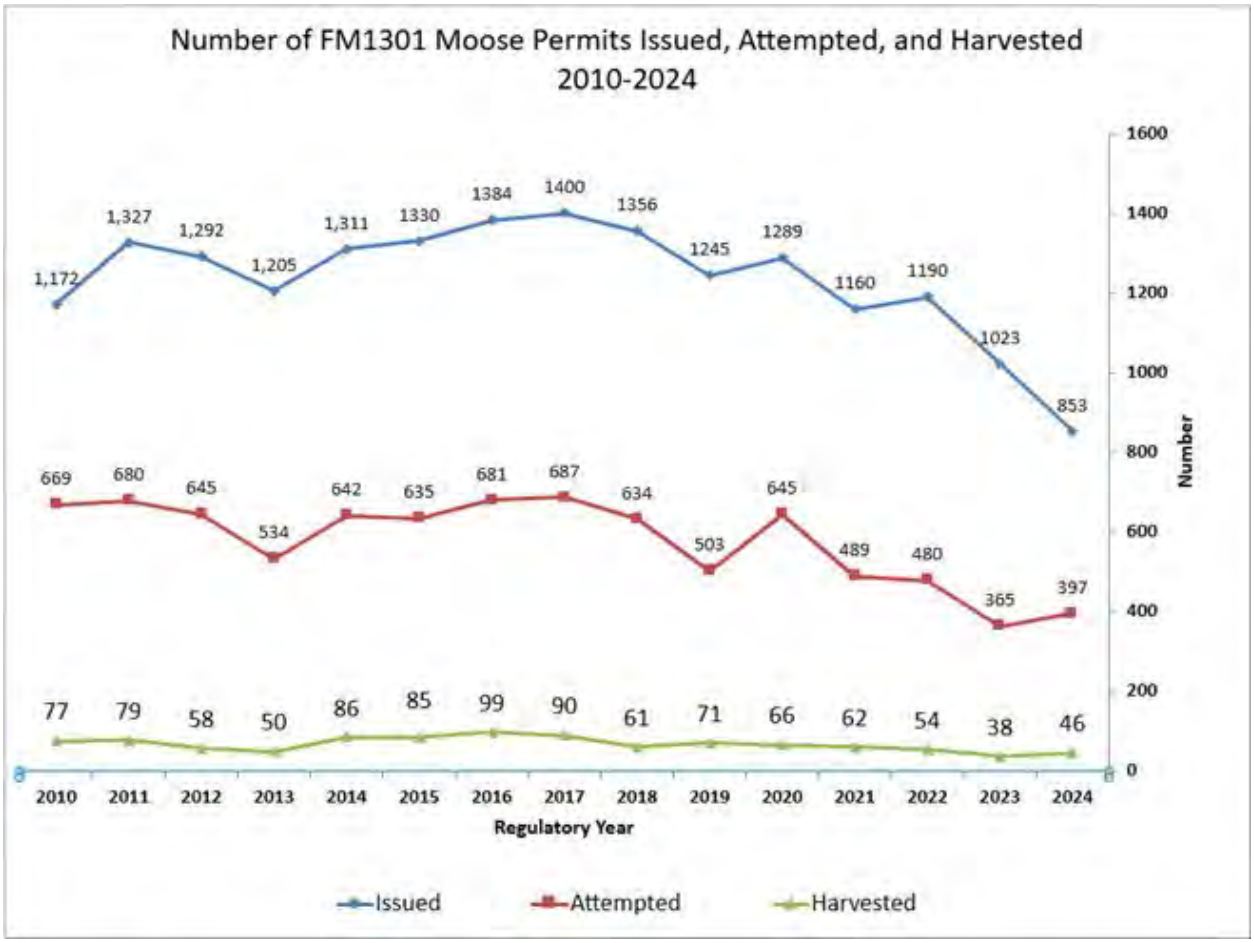
Table 1. FM1301 harvest for the 2024 moose season in GMU13

Time Frame	Permits Issued	Permits Attempted	Bulls Harvested	Hunter Success Rate
2024	**853**	**397**	**46**	**11.6**
5-Year Average 2019-2023	1,181	496	58	11.6 [(14.1+10.2+12.5+11.3+10.1)/5]

FM1301 Moose harvest numbers by subunit 2024

13A: 1
13B: 31
13C: 1
13D: 9
13E: 4

Figure 1. Federal Subsistence Moose Harvest (FM1301) from 2010 to 2024



FEDERAL SUBSISTENCE CARIBOU HARVEST GMU 13

Table 2. FC1302 caribou harvest in GMU13. Closed 2023-2025.

	Permits Issued	Permits Attempted	Bulls Harvested	Cows Harvested	Total Harvest	Success Rate
2023/25	N/A					
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 (FC1302) from 2010 to 2022