Wrangell-St. Elias National Park Subsistence Resource Commission

Meeting Materials

Fall 2024

Wrangell-St. Elias National Park and Preserve
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Wrangell-St. Elias National Park
Subsistence Resource Commission

Fall 2024 Meeting Materials

Table of Contents

Procedure for Consideration of Proposals[1]

1. Introduction and presentation of proposal/analysis

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

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

3. Public/advisory group/agency testimony

4. SRC recommendation

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

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

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

5. Final action

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

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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 9/16/2024)

October 4-5, 2024

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 March 14-15, 2024, meeting* (Chair)

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

8) Commission membership status (Coordinator)

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

10) Superintendent's report (Superintendent)

11) Public Comments (available each morning)

Action Items:

12) Old business action items
   a. Proposed Superintendent's Compendium entry revising the Subsistence Log Harvest Policy and addressing use of small bridges for subsistence access*
      - Introduction (Coordinator)
      - Report from working group
      - Opportunity for public input
      - SRC discussion and recommendation
   b. Proposed Superintendent's Compendium entry regarding the external boundaries of the resident zone*
      - Introduction (Coordinator)
      - Report from working group
      - Opportunity for public input
      - SRC discussion and recommendation

13) New business action items
   a. December 2024 SRC Chairs Workshop (Coordinator)
      - Request for feedback on workshop agenda
      - Identify topics and concerns to share at the workshop
   b. Review and comment on proposals to change federal subsistence fisheries and wildlife regulations* (Cohen/Cellarius)
      - Timely updates to inform proposal comments
      - FP25-03a: Tolsona C&T for salmon in Chitina Subdistrict
      - FP25-03b: Tolsona C&T for freshwater fish in Upper Copper River drainage
      - WP25-01: Nelchina Caribou seasons, hunt management, and §804 user prioritization analysis

c. Review and comment on relevant proposals to the Alaska Board of Fisheries*
   - Timely updates to inform proposal comments
   - Proposal 51: Revise Copper River District Salmon Management Plan
   - Others?
d. Review and comment on relevant proposals to the Alaska Board of Game*
   - Timely updates to inform proposal comments
   - Proposal 59: Lengthen wolf trapping season in Unit 11
   - Proposal 60: Lengthen coyote trapping season in Unit 11
   - Others?
e. New project funding to address community subsistence food security resilience*
   - Update on outreach and proposals received (Cellarius)
   - Opportunity for public input
   - SRC discussion of project ideas and possible partners for any remaining funding
f. Fisheries Resource Monitoring Program Priority Information Needs*

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

Reports:

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 Office)
   b. Report on recent Federal Subsistence Board actions (Cellarius)
   c. Update regarding caribou working group (Pister)
   d. Overview of previous discussions of a durational residency requirement for subsistence eligibility (Coordinator)
   e. Update regarding resident zone community request from Tolsona (Cohen/Cellarius)
      - Opportunity for public input

16) Wrangell-St. Elias National Park and Preserve and NPS Alaska Regional Office staff reports
   a. NPS Alaska Region Subsistence Program report (AKRO staff)
   b. Resource Stewardship and Science report (Pister)
   c. Wildlife report (Cutting)
   d. Fisheries report (Sarafin)
   e. Copper River sockeye salmon research report (Miller)
   f. Subsistence/anthropology report (Cohen)
   g. Interpretation and Education report (Hernandez)

17) Other reports (*Invited/Time limit of 15 minutes unless approved in advance*)
   a. Ahtna Intertribal Resource Commission
   b. Alaska Department of Fish and Game
   c. Bureau of Land Management
   d. Tetlin National Wildlife Refuge

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

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

20) Adjourn meeting* (Chair)

DATE: October 4-5, 2024.

TIME: 9 AM to 5 PM (or until business is completed) October 4 and 9 AM until business is completed on October 5. If the SRC completes its business on October 4, no meeting will take place on October 5.

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

March 14-15, 2024
Buster Gene Memorial Hall
Gakona, Alaska, and by Teleconference

1) **Call to order:** Sue Entsminger, the SRC chair, called the meeting to order at 9:06 A.M.

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

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

   NPS staff: Eva Patton (Alaska Regional Office), Jason Decvich, Ben Bobowski, Benjamin Pister, Dave Sarafin, Kyle Cutting, Mark Miller, Barbara Cellarius, Amber Cohen, Carrie Wittmer, Heather Yates, Jan Maslen (all from Wrangell-St. Elias National Park and Preserve or WRST).

   Other state or federal agency staff: Heidi Hatcher (Alaska Department of Fish and Game (ADF&G)-Glennallen), Mark Sommerville (ADF&G-Glennallen), Tracy Hansen (ADF&G-Glennallen), Todd Rinaldi (ADF&G-Palmer), Caroline Ketron (Bureau of Land Management (BLM)-Glennallen), Leanne McDonald (BLM-Glennallen), Sierra Carmello (Tetlin National Wildlife Refuge), Shawn Bayless (Tetlin National Wildlife Refuge).

   Tribal government or tribal organization representatives: Karen Linnell (Ahtna Intertribal Resource Commission or AITRC), Kelsey Stanbro (AITRC), Sterling Spilinek (AITRC), Deanna Kosbruk (AITRC), Robert Sequak (AITRC), Edward GreyBear (Ahtna, Incorporated), Lorraine Titus (Northway Village Council elder advisor).

   Members of the public: Mark Schlenker (Gakona), Michael Rego (Nabesna).

4) **Housekeeping announcements:** Barbara Cellarius gave instructions for participating in the teleconference and in-person meeting. She explained the process for public comments and provided an overview of Robert's Rules of Order. An orientation for the new members will be arranged. Alaska Geographic provided the funds for coffee and snacks.

5) **Review and adoption of agenda**: Sue Entsminger explained that Kaleb Rowland had asked that action items be moved the first day due to limited member availability. Suzanne McCarthy moved to adopt the agenda, which was seconded by M. Starr Knighten. The agenda was adopted by unanimous consent.

6) **Review and approval of minutes from September 27-28, 2023, meeting:** Kaleb Rowland moved to adopt the minutes as written, which was seconded by Suzanne McCarthy. The minutes were approved by unanimous consent.

7) **Superintendent's welcome and review of the Commission purpose**: Superintendent Ben Bobowski reviewed the Commission purpose. He welcomed and thanked Commission members for their time. He highlighted Subsistence Coordinator Barbara Cellarius for her longtime commitment to the Commission. He thanked the community of Gakona for hosting the meeting.

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

   a) **Chair Report**: Chair Sue Entsminger reported that the Regional Advisory Council chairs met with the Secretary of the Interior about the proposed rule to add three seats to the Federal Subsistence Board. Mentasta Pass had a brutally cold winter with temperatures consistently around negative fifty. She was part of several working groups with park staff, including the working group on resident zone boundaries. Residents in her area harvest their fish from a fish wheel in Slana. When hunting in the park, they noticed plenty of wolves. Her son took four wolves by his house.

      i) **Report on SRC Chairs workshop**: Sue went to the SRC Chairs Workshop in December with Kaleb Rowland. At a previous Chairs Workshop, she remembered Commission chairs talking to each other. At this meeting, only three or four Chairs were present in person. She would have appreciated more time for the Chairs to talk about the issues together. The concerns brought up by other Chairs were similar, such as predation and low numbers of caribou.

      Kaleb Rowland added that while most SRCs were represented by one person, there were five or more NPS staff from each park. He felt that the SRC representatives could not freely share their problems. They had about two minutes to talk outside of a breakout session. There were more NPS presentations than discussions. If the park service was going to call it a SRC Chairs Workshop, he recommended they let the Chairs talk to each other.

   b) **Other SRC member reports:**

      Dan Stevens said that due to medical issues, he felt blessed to be at the meeting. He approved of the updated agenda.

      Suzanne McCarthy said there was a high amount of snow, a giant issue with caribou, issues with moose, and concerns about food security. Fishing had been okay the previous year. She said there was a lot at stake locally and statewide. She recommended that all the

agencies work together on subsistence. She welcomed the new members to the Commission. She advised that it takes years to build the knowledge needed and said to be mindful that their decisions change laws and access to subsistence for local people.

Daryl James said he was glad to represent Yakutat, the east side of the park, and that conditions were changing rapidly on the Malaspina Forelands.

M. Starr Knighten said that while there was a learning curve about the responsibility of the Commission, she was meeting much of the purpose in her personal life. She is a member of the Copper Basin Advisory Committee and attended the all-Regional Advisory Council meeting. She had given testimony on the Nelchina caribou closure. She customarily and traditionally used fish, moose, and caribou. Recently, she taught Ahtna culture and history at Glennallen High School. She had the class listen to the ANILCA Section 804 analysis session of the all-Regional Advisory Council meeting and taught them how laws have changed the history of the Ahtna people. She enjoyed fishing and would love to hunt more moose and caribou.

Clint Marshall was on the working group to refine boundaries of the resident zone. He heard about changes in the State of Alaska to come in line with ANILCA and was keeping an eye on that. He worried other species would decline like the caribou herds had. He was baffled by the mismanagement of the Nelchina herd.

Kaleb Rowland said his father found four or five rut-killed moose when out flying. He was concerned about the effects of wolf predation on sheep and moose populations.

Bruce Ervin reported that not many people harvested a moose. He supported extending the fall moose season to September 30. He has a friend who trapped in the Tok area, and he had a slow season as well. Down in the refuge, not many moose were being seen. Though people were attempting to harvest, the seasons were changing, and it seemed like everything was later. When it was warm, moose did not move. With the caribou season closed as well, it was a tough winter.

Nathan Brown expressed concern about the Nelchina caribou closure and wondered if it would trickle down to other species. The salmon run had decreased. He talked with old-time hunters, trappers, and fishermen, and few people harvested moose. There has been a decline in sheep sightings and an uptick in the wolf population in Slana.

9) **Superintendent's report:** Ben Bobowski began by expressing his appreciation for the feedback on the SRC Chair's Workshop. He highlighted the personnel changes for the park. With the upcoming budget, the National Park Service (NPS) would have a five-to-ten percent decrease in funding. Staff will keep the Commission updated on any changes. The Commission would hear about a Board of Fisheries proposal by the park. The Wrangell-St. Elias Superintendent has a delegation of authority for the Copper River to protect subsistence fisheries, and the park wanted to address increased uncertainty of salmon fisheries. The boundaries of the three resident zone communities would be discussed due to the increasing frustration in the Visitor Center by both local community members and park staff on eligibility. The park had also received a resident zone community request from Tolsona. If

the Commission had other ideas about clarifying boundaries, the park would be happy to hear them. The Compendium is used sparingly, almost always to resolve conflicts stemming from administrative issues. Fire management had been brought up at the last meeting and would be discussed at this meeting.

Action Items:

10) Election of officers

a) **Chair:** Barbara Cellarius opened the floor for the election of the SRC chair. Suzanne McCarthy nominated Sue Entsminger, and Suzanne also called for the question. Sue Entsminger was re-elected as SRC chair by unanimous consent.

b) **Vice chair:** Sue Entsminger opened the floor for the election of the new SRC vice chair. Kaleb Rowland nominated Suzanne McCarthy, and Dan Stevens closed the nominations. Suzanne McCarthy was elected as SRC vice chair by unanimous consent.

11) Old Business Action Items

a) **Superintendent's Compendium entry regarding resident zone boundaries**

i) **Introduction:** Barbara Cellarius introduced the Superintendent's Compendium, which is a written compilation of designations, closures, and other authorizations adopted under discretionary authority in federal regulations. The proposed change would clarify the external borders of the park resident zone in three locations. The park currently has twenty-three resident zone communities, eighteen of which were established in 1981. Five additional communities were added in 2002. In previous discussions, the Commission had been clear it was not interested in defining boundaries between adjacent communities within the resident zone. A local subsistence user recommended defining the boundary in writing, noting that if the park was going tell someone that they weren't eligible to hunt in the park because they didn't live in the resident zone, a boundary should be specified in writing.

The park has proposed using the census designated place boundaries used by the US Census Bureau for the 2020 Census:

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

Suzanne McCarthy asked who had requested drawing boundaries. Superintendent Ben Bobowski explained that the idea had been in development for a while. Bruce Ervin asked if any tribes from the Ahtna area been asked, and Barbara Cellarius explained she had reached out to Ahtna villages closest to the three locations about the opportunity to comment.

ii) **Report from the working group on resident zone boundaries:** Sue Entsminger introduced the discussions of the working group. The working group members were SRC members Clint Marshall, Dan Stevens, Sue Entsminger, and Suzanne McCarthy,

along with Karen Linnell from the Ahtna Intertribal Resource Commission. Suzanne McCarthy reported that the working group met twice but had not met as a full group. The first meeting was held on December 14 with Clint Marshall, Dan Stevens, and Suzanne McCarthy participating. The second meeting was held on January 24, with Clint Marshall, Sue Entsminger, and Karen Linnell participating. The recommended boundaries from the second meeting were five hundred meters west of the west side of Tolsona Creek at mile 173 on the Glenn Highway for Glennallen, the Sailors Pit Campground Road (around mile 130 on the Richardson Highway) for Gakona Junction, and the Little Tonsina River (mile 65 on the Richardson Highway) for Tonsina.

Suzanne McCarthy disagreed with the northern boundary for Gakona Junction as it excluded people who lived further north. She was hesitant on reporting the working group recommendations since they had not met all together. She remembered that boundaries were a big deal in the 1990s due to a thriving economy and a fear that the Copper Basin would change significantly. At that point, the SRC had said there was not a biological concern or a reason to draw boundaries. The population is less than half of what it was in the 1990s. She said to remember the spirit of ANILCA and questioned whether it was the time to draw lines.

Clint Marshall commented that the lines were already drawn, and the purpose of the working group was to refine those lines. Dan Stevens expressed concern about whether people living in resident zones were actually full-time residents. There were only twenty year-round residents in Chitina but there could be up to fifty in the summer. Sue Entsminger said the lines were proposals from the National Park Service. Barbara Cellarius explained that the names of communities existed in regulations but the boundaries on the maps were the proposals. Kaleb Rowland echoed Dan's concern due to McCarthy's high summer population and said the park needed to focus on eligibility of people living in resident zone communities.

iii) **Opportunity for public input:**

Gakona resident Mark Schlenker asked why Sourdough was not listed as a resident zone community. There were hardly people living there anymore, but their address was Gakona. He believes residence should be based on where people received their mail.

Ahtna Intertribal Resource Commission Executive Director Karen Linnell said an interactive map would have been beneficial to the working group. She expressed concern about increasing hunting pressure from non-residents and said that having the park limited to rural residents of the resident zone was important as new communities pop up along the highway. She mentioned several people with traditional hunting areas in the park, such as Sourdough Gene, Philip Sabon, and Markle Pete. The ability to go out to the trails was a concern. In terms of a biological concern, she said AITRC was helping the park with wildlife monitoring. Until there was evidence of a concern, she did not believe there was a need to create boundaries, adding that these communities have boundaries. She agreed with Dan's point about proof of eligibility and that people have residences in other part of the state—or out of state—and then

claim to live in a resident zone. She said there must be a better way to prove residency.

Nabesna resident Michael Rego asked whether the boundaries were only for the three communities mentioned. Barbara Cellarius confirmed it was only about the external boundaries in three locations. Michael agreed with the others about proof of eligibility in the resident zone. He was concerned about the ability for someone from an urban area to move to a rural area and be able to hunt in the park immediately.

Barbara Cellarius explained that a minimum one-year residency in the local area was brought up by SRCs in the early 2000s, but a solicitor's opinion said it was inconsistent with the intent of Congress as expressed in ANILCA. Daryl James asked how residency was determined. Barbara explained park staff looked at an Alaska driver's license or other evidence of Alaska residency plus proof of local physical address such as a voter registration card or utility bill. Karen Linnell suggested a one-year waiting period for an urban resident who moved to a rural community to get to know the area and the people, but the requirement wouldn't apply to people moving from other areas in rural Alaska. Suzanne McCarthy cautioned against putting people against each other and said that the main, permanent residence was what qualified people.

Sue Entsminger mentioned that a working group might be needed on those two topics.

iv) **SRC discussion and recommendation:** Sue Entsminger said that with five new Commission members, she felt they were not ready to decide. She wanted to be as inclusive as possible. Bruce Ervin agreed that he did not feel prepared to make a decision. Clint Marshall also agreed but said at some point, they would have to make one. Superintendent Ben Bobowski acknowledged that the Commission could defer their recommendation to their fall meeting.

Clint Marshall moved to defer the SRC recommendation on external resident zone boundaries to the fall meeting, which Daryl James seconded. The motion passed by unanimous consent.

b) **Update on caribou working group:** Benjamin Pister, Team Lead for Resource Stewardship and Science, explained that he was working to reinvigorate the caribou working group. The first post-pandemic meeting is planned for April 23. Invited participants for the working group include the Bureau of Land Management, Fish and Wildlife Service, the Ahtna Intertribal Resource Commission, Ahtna, Incorporated, and a representative from the Commission. Benjamin asked about the preferred structure for the group, specifically whether the SRC supported it being a subcommittee of the SRC versus something else. After testimony from AITRC Ecologist Kelsey Stanbro, several SRC members indicated support for having AITRC organize the working group. Bruce Ervin and Sue Entsminger are the SRC members interested in participating in the working group.

c) **Wildlife special action discussion**

i) **Timely wildlife updates applicable to Nelchina Caribou and Unit 12 Moose:** Heidi Hatcher, Alaska Department of Fish and Game Area Wildlife Biologist for Glennallen, gave an update on the Nelchina caribou herd. The fall composition survey showed 3 calves per 100 cows going into winter and 25 bulls per 100 cows. Sixteen VHF collars were deployed on female caribou. The fall population estimate was between 7,000 to 8,000 animals. The state is not offering a harvest opportunity for Nelchina caribou in the upcoming regulatory year. For the winter, the caribou have not migrated far, staying about 150 miles closer to their calving grounds, and wintering in the North Wrangells and the Tetlin Flats. Mortality checks occur once a month, and there is a strong indication of predation causing over half of the mortalities. Clint Marshall asked what species Heidi thought the predators were. Heidi replied there was a strong indication of wolves among other species.

Caroline Ketron**,** Subsistence Coordinator/Anthropologist for the Bureau of Land Management Glennallen Field Office, said that the caribou hunt was closed entirely this year. BLM supported the closure due to the low population numbers. The Federal Subsistence Board will decide whether to give BLM a delegation of authority for in-season management of the Nelchina caribou herd. The BLM Field Manager was working on the logistics, and it would include consultation with the Regional Advisory Councils, AITRC, and tribes, and in some cases public hearings. Bruce Ervin asked about the Nelchina caribou numbers and about the herd itself. Heidi Hatcher explained that the count was done in the summer and that in the winter, the Nelchina herd mixed with the Mentasta herd. Daryl James asked about the herd counts over the last five years. Heidi explained they experienced two severe winters in a row and zero recruitment for three years in a row. When the herd peaked in 2019, it was intentionally reduced to the objective and right after, the first severe winter hit and led to high mortality.

ii) **Season extension or delegation of authority to Refuge Manager to extend fall moose hunt in Unit 12, that portion within the Tetlin National Wildlife Refuge and those lands within WRST Preserve north and east of the Pickerel Lake Winter Trail:** Shawn Bayless, Refuge Manager for Tetlin National Wildlife Refuge, reported that the refuge had not surveyed moose for the past two years, but the Alaska Department of Fish and Game had conducted surveys in Units 20E and parts of 12, which saw a decline in the moose populations. Todd Rinaldi from Alaska Department of Fish and Game in Palmer said the Unit 12 staff were at the Board of Game meeting. Lorraine Titus of Northway stated that they asked Shawn for the extension last hunting season because the moose had not been moving and only three moose had been harvested from Northway. The moose did not start rutting until around the 20th and that was why they wanted an extension to the 30th. Shawn reported that the 2022 moose survey data had 0.40 moose per square mile with 12 calves per 100 cows, and 54 bulls per 100 cows.

Bruce Ervin made a motion to submit a special action request to extend the fall moose hunt in Unit 12, that portion within the Tetlin National Wildlife Refuge and those lands within Wrangell St. Elias Preserve north and east of Pickerel Lake Winter Trail,

to September 30th. Kaleb Rowland seconded. The motion passed by unanimous consent.

Barbara Cellarius had received a written request from Tok resident Mike Cronk to change the moose season in Unit 12 remainder, first as a special action and then through regulatory change, to remove the break between August 29 and September 7 for a continuous season to September 20. Clint Marshall asked about the break in the season. Sue Entsminger said that thirty years prior, there were a lot of people hunting in that area especially over Labor Day weekend. Barbara added that the BLM lands in the Unit 12 remainder had recently become unencumbered, which was why a federal subsistence moose season in Unit 12 remainder had recently gone before the RAC. The federal moose season in this area reflects the existing state season plus a three-day extension to provide additional subsistence opportunity. Clint asked whether approving the proposal would lead to more hunting. Sue Entsminger said people were accustomed to the ten-day break, and locals had wanted the same season as the state. She felt the proposed change worked better as a proposal. Kaleb Rowland said that people want to extend the back end of the season when moose rut, and that the ten days in August did not provide much of an advantage. The Commission did not take up the request.

iii) **Combine Nelchina caribou herd proposal with request for ANILCA 804 analysis:** Barbara Cellarius explained that at the September 2023 SRC meeting, the Commission voted to submit a special action request for an ANILCA Section 804 user prioritization analysis. The Federal Subsistence Board rejected the request due to a lack of a regulatory action. It was suggested that the Commission could submit a special action request that combined a regulatory request with an 804 analysis.

Sue Entsminger asked for public comment. Karen Linnell said that the ANILCA 804 request should not have to be requested but should be done automatically when resources were below management objectives. For the Nelchina herd, it should have been done when the herd was at 21,000 animals. Karen said she had testified at the Federal Subsistence Board meeting asking for an 804 analysis but had not heard a reply.

Clint Marshall moved to submit a temporary special action request for a one-year closure of the Nelchina caribou herd for all users in Unit 11, Unit 12 remainder, and Unit 13 and to request an ANILCA Section 804 user prioritization analysis using state and federal harvest data. Kaleb Rowland seconded. The motion passed by unanimous consent.

12. New business action items

a) **Timely fisheries updates**

i) **Wrangell-St. Elias:** Wrangell St. Elias Fisheries Biologist Dave Sarafin reported that the 2023 salmon run began weak or delayed in start and then increased in strength as the season progressed. The Miles Lake sonar reported an estimated season total passage of 991,740 salmon, which was 71% above objective. The park issued 290 Glennallen Subdistrict permits, 196 Chitina Subdistrict permits, and 2 permits for

Batzulnetas. The total harvest from these opportunities was 21,468 (sockeye and Chinook), which was between the five- and ten-year averages. The Lower Copper River fishery had a harvest of 180 sockeye salmon and 4 Chinook salmon. The Tanada Creek weir had an estimated passage of 9,254 sockeye, which was half of the historic average of 18,000 sockeye. In 2025, Dave will work with Dan Gorze of AITRC to inventory freshwater harvestable fish in the park. AITRC will also have a more involved role in the collaborative operation of the Tanada Creek weir.

Sue Entsminger asked about the Lower Copper River fishery numbers. Dave said there was mainly one good location that a couple of people used, and success was dependent on water level.

ii) **ADF&G:** Mark Sommerville, ADF&G Glennallen Area Management Biologist of the Upper Copper and Susitna Management Area, gave a presentation called "Introduction to Copper River Salmon Fisheries." For the period 2019 to 2023, 41.9% of the sockeye run was harvested by the commercial fishery, 9.6% by Chitina Subdistrict personal use fishery, 3.9% by the Glennallen Subdistrict fishery, and 0.3% each by the Copper River District subsistence fishery and the sport fisheries, respectively. Spawning escapement made up the remaining 45.7% of the run, with 33.6% of the run spawning in the Upper Copper River, 8.4% in the Copper River Delta, and 3.1% in the Chitina River. For Copper River king salmon from 2019 to 2023, 23.3% of the run was harvested in the commercial fishery, 7.1% by the Glennallen Subdistrict fishery, 4.4% by the Chitina Subdistrict personal use fishery, 2.3% by the sport fishery, and 1.6% by the Copper River District subsistence fishery. Spawning escapement made up the remaining 61.2% of the king run, with 40.2% spawning in the Upper Copper River and 21.0% in the Chitina River. He also examined the fishing power, or the effectiveness, of different fisheries: the commercial fishery took 42 to 50% of the total run, the personal use fishery took 15 to 20% of the total past the sonar, and the subsistence fishery took 8 to 10% of the total past the Chitina-McCarthy Bridge. Seventy percent of the fish past the sonar end up in their spawning grounds. Analyzing permit data, participation in the Chitina Subdistrict fishery peaked in 1998, dropped off, and then increased in 2015. Since then, participation had been declining to an estimated 5,000 to 6,000 participants. For the Glennallen Subdistrict, participation increased until 2015 and then decreased. The decrease has mostly been in fish wheel users; dipnet users have gone up.

b) **Call for proposals to change federal subsistence fishing regulations**
   i) **Introduction:** Dave Sarafin explained the opportunity for the Commission to develop proposals to change federal subsistence fishing regulations.
   ii) **Opportunity for public input:** No public input was received.
   iii) **SRC discussion of potential proposal submissions:** No proposal was discussed.

c) **Call for proposals to change State of Alaska fishing regulations for the Prince William Sound Area**
   i) **Introduction:** Wrangell St. Elias Ecologist Mark Miller explained that there was currently a call for proposals to change State of Alaska fishing regulations for the Prince William Sound Area and that park staff were available to assist the SRC with

drafting proposals. Additionally, the park is considering submitting four proposals pertaining to two separate fisheries management plans: the Copper River District Salmon Management Plan and the Copper River King Salmon Management Plan. One possible proposal would address a discrepancy between the two plans. The objective of the other three potential proposals is to maintain sockeye and king salmon population diversity and resilience of salmon populations and fisheries in response to changing environmental conditions. One approach would involve using the sonar to determine the openings of the commercial fishery, while the others would include use of genetic stock composition data. The intent of both approaches is to ensure, to the extent practicable, that harvest is distributed proportionally across all salmon stocks and that no individual stocks are placed at elevated risk of extirpation.

M. Starr Knighten said she appreciated that the proposals would allow fish to get up the river. If they were managing with traditional knowledge, they would let all the first fish up the river. Those with fish wheels on the lower end of the river did not run their wheels so that Chistochina could get their fish. The first fish that came through were of nice quality, while the later runs were mushy. The commercial fishery should not have opened after the first day or two last year.

Suzanne McCarthy said it was noticeable when the commercial fishery was closed. The wheels in Gakona were filled with reds and kings, though the reds were lower compared to thirty years ago. She never had a full basket during the 2023 fishing season, and they pulled the wheel before the late runs to let the fish up the river as well. Dan Stevens said his wheel was in Lower Tonsina and it had trouble with fish. The commercial fishermen were hitting heavy at the mouth of the Copper River.

ii) **Opportunity for public comment:** No public comment was received.
iii) **SRC discussion of potential proposal submissions:** No discussion occurred.

d) **Proposed Rule Regarding Federal Subsistence Board Membership:** Barbara Cellarius introduce a proposed rule to increase the size of the Federal Subsistence Board by adding three members nominated by tribal governments. These nominees needed to have direct experience with, and knowledge of, subsistence in rural Alaska including Alaska Native subsistence uses. Current membership of the Federal Subsistence Board is five federal agency heads and three public members, one of whom is appointed as the Chair. Barbara then walked the SRC through a series of questions asked in the proposed rule to facilitate the development of comments. Staff also shared information about discussion of this topic from the recent All-RAC meeting.

The Commission developed the following recommendations through a consensus process and verified its intent to submit them with a vote at the end of the meeting to include reference to these comments in its letter to Secretary Haaland.

- Qualifications for new public members: The new public members should be federally qualified subsistence users who have personal knowledge of and direct experience with the Alaska National Interest Lands Conservation Act, subsistence uses in rural Alaska including Alaska Native subsistence uses. Other

qualifications that should be considered knowledge of other regulatory processes such as the State of Alaska Boards of Fish and Game, the North Pacific Fisheries Management Council, as well as advisory bodies such as local fish and game advisory committees, federal subsistence regional advisory councils, and national park subsistence resource commissions. It is important for the new members to have a regional perspective, rather than experience and knowledge that is limited in geographic scope.

- Qualifications for current public members: Additionally, the current public members should have the same qualifications as the new members.
- Qualifications for the Chair: The same eligibility requirements should apply to the FSB Chair. The Chair should also have experience in prior leadership roles, such as chairing meetings, and have the ability to work with federal agencies.
- Nomination source for the new public members: Limiting the source of nominations for three new public members to Federally recognized tribal governments is supported, provided that there is an open public nomination process for the existing public member seats without limitations on the source of the nominations. Tribal governments will know who has the knowledge of and experience with subsistence uses in rural Alaska, including Alaska Native subsistence uses, that are essential qualifications for the public FSB members. However, there should be an opportunity for non-Native rural subsistence users to be appointed to the board. That is consistent with the rural priority in the Alaska National Interest Lands Conservation Act.
- Process for receiving nominations: The Secretaries should broadly solicit nominations or recommendations from federally recognized Tribal governments for the three new public seats.
- Quorum: Quorum should be comprised of a simple majority of agency members (three) and a simple majority of public members (four), for a minimum of seven. It is important to ensure representation from the public members at all meetings.
- Public member alternates: Public members should have alternates who can stand in for them in times of illness or other unavailability. The alternates should have the same qualifications as the public members. They should receive the same training as the public members and have funding to attend the Board meetings in order to be prepared to step in if needed.
- Term limits: Public members should be appointed to three-year terms, similar to the federal subsistence regional advisory councils, and should be able to be reappointed without the need to formally reapply. There should not be term limits. The knowledge that comes with longevity is important. Terms should be staggered.
- Other considerations:
    - Geographic representation should also be considered in selecting new public members. It doesn't need to be an exact formula, but it should be a factor considered. For example, people in one area fish differently from people in other areas.
    - Public members should have staff support to assist them in their roles as board members, like the support that agency board members receive.

e) **New project funding to address critical food security needs:**
   i) **Project overview:** Barbara Cellarius explained that the NPS Alaska Region had received $6.2 million in Inflation Reduction Act funding to address food security, some of which was specifically going to be put towards community-identified projects to support food security resilience. Examples of potential projects include: (1) subsistence fish and wildlife monitoring projects and/or harvest monitoring and reporting managed locally with local hires; (2) projects that enhance the capacity of rural communities to engage effectively with federal and state regulatory programs and advocate for regulatory changes that ensure stability of access to subsistence foods in the context of changing patterns of fish and wildlife availability; (3) Indigenous knowledge (IK) projects for documenting and incorporating IK in management decision making; (4) subsistence-related Tribal-NPS liaison programs; and (5) youth and elder programs for transmission of knowledge across generations. Tribal and community outreach about project ideas will begin in the spring. Projects will begin in 2025.
   ii) **Opportunity for public input:** AITRC Ecologist Kelsey Stanbro said they had funding to assist with a fish camp in which an elder would teach about making fish wheels.
   iii) **SRC discussion of project ideas:** Suzanne McCarthy suggested organizations such as Wrangell Institute for Science and Environment (WISE) and the Copper River Watershed Project as good partners. Bruce Ervin would like to see the funding used for culture camps. Clint Marshall agreed with working with the Copper River Watershed Project and getting tribal entities and nonprofits such as Copper River Native Association involved. He also recommended the University of Alaska, who had held programs on canning fish. Sue Entsminger said projects should focus on food security and that she would like to see more animals on the landscape. She mentioned projects that would help the sheep population such as supplemental feeding, burning, and lambing. Kaleb Rowland would love a class on smoking and canning fish. Dan Stevens offered to teach people how to smoke fish. He also wanted to learn more about the condition of sheep around Chitina. Sue Entsminger said funding could go to sheep surveys.

   Mark Miller said that passing on traditional activities such as smoking salmon would fit as a type of project. Clint Marshall suggested a smoke salmon competition as well as teaching how to dry salmon. M. Starr Knighten mentioned partnering with AITRC or Ahtna, Incorporated and that Copper River Native Association has a youth program (YETI), which will focus on working in a greenhouse.

13) **Set tentative date and location for next SRC meeting:** Kaleb Rowland made a motion to make September 23 and 24 the primary date, October 4 and 5 the backup date for the fall 2024 SRC meeting, and to hold the meeting in Copper Center, which Suzanne McCarthy seconded. The motion passed by unanimous consent.

Reports:

14) 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 (alternate)	Copper Center	Secretary of Interior	9/27/2026
Kaleb Rowland	McCarthy	Governor	12/01/2023
Suzanne McCarthy	Gakona	Governor	12/01/2024
Nathan Brown	Slana	Governor	3/13/2027
M. Starr Knighten	Glennallen	Southcentral RAC	10/04/2026
Daryl James	Yakutat	Southeast RAC	10/27/2025
Sue Entsminger	Mentasta Pass	Eastern Interior RAC	11/04/2024

15) Reports related to old and new business

a) Update regarding SRC research and management priorities

i) **Discussion of next steps:** Benjamin Pister asked the Commission their preferred method of receiving updates regarding the research and management priorities that they had previously identified. One example provided was a handout created by the Central Alaska Network. SRC members responded with ideas about venues for sharing this information with local communities. Kaleb Rowland recommended posting information on the mail shack in McCarthy. Sue Entsminger added to post in post offices and at Three Bears store in Tok. She also would like to see the handouts done for Nelchina caribou, moose, sheep, and salmon. M. Starr Knighten mentioned the Environmental Fair held by CRNA, which occurs every year. Bruce Ervin said to send summaries to the tribes for them to email out. Nathan Brown said information could be added to the Slana Community Corporation Newsletter.

ii) **Report on NPS Fire Management Program:** Barbara Cellarius explained that Jason Devcich had been invited to provide a brief overview of what the National Park Service does with respect to wildfire management, because managing wildfires in a way that benefits wildlife came up in management priorities discussion at the last meeting. Jason explained his role as the fire management officer for Wrangell-St. Elias and the interagency cooperation to manage a wildfire. The program had been growing and recently added a fire ecology program. He was looking to expand using prescribed fire to support subsistence opportunities.

Suzanne McCarthy asked about prescribed burns. Jason Devcich said the park only burned hand piles to protect culturally significant sites. M. Starr Knighten asked whether he worked with Ahtna, Incorporated and Chitina Native Corporation, which Jason said they did through their contact at the Division of Forestry. Clint Marshall asked whether there were areas in the park that Jason wished would burn. Jason explained the fire management options using the Alaska Wildland Fire Information Map. Suzanne asked whether habitat enhancement through fire management could occur on park lands. Jason said that resources were a part of fire management planning and that they hoped to hire a fire planner. M. Starr Knighten mentioned that when a fire happens, caribou will not go back for eighty years due to the lack of

lichen and asked whether Jason was keeping up with that research. He replied that tracking climate change led to adding a fire ecologist to their program and that they were focusing on how to use data to make the best decisions for fire management and response.

b) **Update regarding working group on Subsistence Log Harvest Policy and use of small bridges for subsistence access:** Barbara Cellarius reported that working group members were Suzanne McCarthy, Sue Entsminger, Kaleb Rowland, and Gloria Stickwan. The group met twice and has developed recommendations regarding the harvest of standing dead timber and the use of small bridges for subsistence access. But they hadn't yet discussed recommendations for standing live timber. It was agreed to hold another meeting and invite Gloria if she was interested. Dan Stevens volunteered to join the working group.
New working group membership: Suzanne McCarthy, Kaleb Rowland, Sue Entsminger, Dan Stevens, and Gloria Stickwan (if interested).

c) **Resident zone community request from Tolsona:** Barbara Cellarius reported that Tolsona Community Corporation had requested the addition of Tolsona to the Wrangell-St. Elias resident zone. The next steps will be to prepare a written analysis regarding the long-term customary and traditional pattern of subsistence uses by Tolsona residents. A public hearing will be held to take comments on Tolsona's request. The request will then be added to an SRC meeting agenda as an action item. After these steps, the Superintendent will determine whether Tolsona appears to meet the federal regulatory requirement of containing significant concentrations of rural residents who, without using aircraft as a means of access, have customarily and traditionally engaged in subsistence uses within the park. If Tolsona appears to be qualified to be added to the resident zone, the National Park Service will initiate a regulatory change process and an environmental compliance process. The process might take two to three years. Tolsona residents with a longtime history of use in the park were invited to apply for 13.440 permits.

Suzanne McCarthy asked about the public meeting. It had not yet been scheduled. Sue Entsminger asked about the process. Barbara responded that the resident zone was a NPS eligibility issue and not a decision by the Federal Subsistence Board. Suzanne McCarthy asked whether the working group on boundaries would still meet, which Barbara confirmed would happen.

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

a) **Resource stewardship and science report:** Benjamin Pister reported that in the latest round of NPS funding, the park submitted four projects, two of which had been funded. One was a caribou project, written by Kyle Cutting, to examine the landscape use of the Mentasta and Chisana caribou herds; $183,000 would be coming in FY26 to start that work. The other funded project is for an inventory of harvestable fish in select waters of the park, written by Dave Sarafin, with $127,000 coming in FY25. The two project proposals awaiting decisions are a sheep project looking at snow gradient and a project looking at the relationship between white spruce growth and weather.

b) Copper river salmon fisheries research report: Mark Miller highlighted the numerous ongoing projects in salmon fisheries research. He acknowledged that AITRC assisted with the sample collection for the genetics analysis of Copper River sockeye salmon stocks using their own project funding. The principal investigator from the Alaska Department of Fish and Game will present the results at the AITRC Annual Meeting. Inflation Reduction Act funding included support for the salmon research projects.

c) Wildlife report: Wildlife Biologist Kyle Cutting began by acknowledging Sterling Spilinek and Kelsey Stanbro from AITRC and Heidi Hatcher and Jeff Gross from ADF&G for their collaboration. He discussed the Mentasta, Chisana, and Nelchina caribou herds. The park was working to understand when the Mentasta and the Nelchina herds overlap. Wrangell-St. Elias is home to the largest Dall sheep population in the world, and more Dall sheep are found there than all national parks combined. There has been a 40 to 60% percent drop in Dall sheep in the park, driven by a variety of factors including deep snow amounts. He had also conducted a moose survey from Chisana to McCarthy, and it was the lowest recorded count since 2007. He was working on a project to summarize the moose surveys. He was also conducting counts on golden eagles and bald eagles.

Daryl James asked about the moose and goat count for the Malaspina Forelands. Kyle said they did not have information there, but it could be future research.

Kyle mentioned that the Board of Game proposals were due May 1. Nathan Brown made a motion to develop a proposal to extend the seasons for wolf and coyote in Unit 11 to match the season length in Unit 12 and Unit 13. Kaleb Rowland seconded. The motion passed unanimously.

Kaleb Rowland mentioned he had a proposal for the winter moose hunt but would wait until the call for proposals for federal wildlife regulations.

d) **Subsistence/anthropology report:** Cultural Anthropologist Amber Cohen reported that park staff as well as researchers from ADF&G Division of Subsistence and AITRC surveyed residents in Slana about their harvest and use of wild fish, wildlife, and other resources. Data review meetings were held for Mentasta in December and Chistochina in February. She gave updated permit and harvest numbers for the fall and winter hunts. For the fall moose hunt in Unit 11 remainder, 140 permits were issued, 62 individuals hunted, and 10 animals harvested. For the winter moose hunt, 21 permits were issued, 4 individuals hunted, and 1 moose had been harvested. For the joint state-federal fall moose hunt in Units 11 and 12 (RM291 permit), 297 permits were issued, 154 people hunted, and 10 moose harvested. Of those, 171 permits were issued to federally qualified subsistence users, 82 of whom hunted. The 10 moose harvested were all by federally qualified subsistence users. She gave updates on the traditional knowledge, ethnographic and subsistence projects. For the Dall sheep local knowledge project, a second interview has been completed, with several others scheduled for the spring and summer. A project proposal has been submitted for a methodology to capture customary and traditional life ways in local communities. The park is in line for funding beginning in 2025 for an

ethnographic landscape study on the coastline in cooperation with the Yakutat Tlingit Tribe and Native Village of Eyak.

Suzanne McCarthy asked whether the ethnographic landscape project would include traditional use within park boundaries. Amber Cohen responded that it would document those connections. Suzanne asked if information could come out that indicated Cordova qualified to be added as a resident zone community. Barbara Cellarius explained the Cordova had requested recognition as a resident zone community in the late 1990s, and park staff went to Cordova to hold a public meeting. The determination at the time was that Cordova lacked a significant concentration of residents who had customarily and traditionally engaged in subsistence uses in the national park. If the information came up from the upcoming research, Cordova would have the option to again request consideration as a resident zone community.

e) **NPS Alaska Region Subsistence report:** Regional Subsistence Program Manager Eva Patton explained that the Regional Subsistence Program supports the federal subsistence regulatory process and Regional Director Sarah Creachbaum in her role as a member of the Federal Subsistence Board. They also support the subsistence parks and the subsistence resource commissions. The National Park Service's Subsistence Advisory Council has $400,000 a year for which parks submit proposals. This funding supports harvest monitoring, cultural and ethnographic work, traditional knowledge studies, place-names studies, and biological research on important subsistence resources. She appreciated the feedback about the SRC Chairs meeting. The Regional Office has a cooperative agreement with the Alaska Native Science and Engineering Program that supports two to three interns per year. The Regional Office has set up a Direct Hire Authority to allow interns to apply for a non-competitive hiring pathway. The intent is to provide these interns a foot in the door to work with the park service.

f) **Interpretation and Education report:** Team Lead for Interpretation and Education and Public Affairs Officer Carrie Wittmer reported that her staff received $600,000 for funding visitor services and youth programs. She highlighted Commission member M. Starr Knighten for her work with the Ahtna Youth Internship program. This upcoming summer, Ahtna, Inc. will have four interns and one supervisor. Six or seven Youth Conservation Corps members will be hired as well. She highlighted several local events such as Winter Fun Day, Chosen Frozen, Earth Discovery Day, Youth Environmental Summit, and Yakutat Tern Festival, among others. The Copper Center Visitor Center will open May 13. There will be two subsistence fishing permitting events where the Visitor Center is open only for permittees. Recreation visitors went up to 74,000 people the previous summer.

Suzanne McCarthy commended the youth activities and said it was important for the community.

Superintendent Ben Bobowski presented several options for an exhibit panel that would highlight the Commission members and their contributions to the park. Kaleb Rowland liked the one with the names of all members through time. Suzanne McCarthy agreed. M. Starr Knighten suggested one side with all the members and one side with the current

members, which Sue Entsminger agreed with and suggested including photos of each current member. Details will be worked out in the coming months.

17) **Public comments on non-agenda items:** No public comments were given at this time. Sue Entsminger asked if public comment should occur in the beginning of the meeting. Suzanne McCarthy agreed, as did M. Starr Knighten and Bruce Ervin. Kaleb Rowland said it would increase public participation.

18) **Reports from other organizations and agencies**

a) **Ahtna Intertribal Resource Commission:** Wildlife Biologist and Research Coordinator Sterling Spilinek reported that AITRC was waiting for funding for the Klutina Sonar project, but in the past summer, the highest daily sonar passage was in the middle of August. Tribal elders had told them that there was a late run. AITRC received two grants through the Tribal Wildlife Grant to do a wolf study within the park and to supplement 20 additional collars on the Mentasta caribou herd. AITRC also received one round of National Telecommunications and Information Administration broadband funding aimed at workforce development and capacity building. He highlighted the work of their GIS Specialist in supporting all of their projects. AITRC also received funding through the Bureau of Indian Affairs Tribal Climate Resiliency Grant to hire a fish habitat restoration biologist to look at aquatic organism passages.

Sue Entsminger asked how many wolves were in the study. Sterling replied they had 20 collars. The project will focus on the Mount Sanford area where there are three large packs. The goal is to look at range, distribution, and diet.

Ecologist Kelsey Stanbro reported that in the summer of 2023, AITRC began a preliminary study to look at disease and parasite burden in sockeye and Chinook salmon. They collected 148 samples and 75 cultures—64 sockeye and 11 Chinook salmon—which were sent to the Fish and Game pathology laboratory for testing. AITRC completed a second year of the Moose Health Monitoring program that stemmed from tribal citizens' concerns over the quality of the moose meat. In 2023, they collected 32 samples. In 2024 thus far, they have collected 2 samples. The samples were analyzed by an Ahtna tribal citizen at the University of Alaska Fairbanks for mercury. Kelsey and the student will go to Texas A&M University to test the samples for heavy metals.

b) **ADF&G:** Heidi Hatcher provided a written handout.

c) **Bureau of Land Management:** Caroline Ketron provided a written handout.

d) **Tetlin National Wildlife Refuge:** Shawn Bayless, the Refuge Manager, reported that the previous three winters had been tough with high amounts of snow. From the 2022 moose survey, the population was down 30 percent from the long-term average. The density estimate was the lowest in about 20 years. One in every five cows had twins. The Refuge issued 65 moose permits with no reported harvests. They were working on habitat suitability assessments for the wood bison.

19) **Letter of recommendation to the Governor and Secretary:** Kaleb Rowland made a motion to write a letter to the Governor of Alaska and the Secretary of the Interior highlighting actions taken at the meeting, including commenting on the proposed rule to add seats to the Federal Subsistence Board, deferring action on proposed changes to the Superintendent's Compendium regarding resident zone boundaries to the fall meeting, submitting wildlife special action requests to the Federal Subsistence Board, and submitting requests to the Alaska Board of Game to extend the trapping seasons for wolf and coyote in Unit 11. Dan Stevens seconded. The motion passed by unanimous consent.

20) **Work session:** No work session occurred. Eligibility and residency requirements will be an agenda item at the fall meeting.

21) **Adjourn meeting:** Suzanne McCarthy made a motion to adjourn, which Dan Stevens seconded. The meeting adjourned at 2:50 P.M. on Friday, March 15.

WRANGELL-ST. ELIAS NATIONAL PARK SUBSISTENCE RESOURCE COMMISSION ROSTER

As of September 2024

NAME	COMMUNITY	APPMT 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	3/11/2027
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

* 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.

WRST SRC Working Group recommendations regarding proposed conditions for subsistence harvest of timber[1]

Conditions	Draft Policy	Draft SRC Recommendation for Dead or Downed Timber	Draft SRC Recommendation for Standing Live Timber[2]
Permit Requirements	• No permit is required for subsistence firewood harvest of dead or downed trees. • Other subsistence uses of standing timber require a permit.	• No permit is required for subsistence ~~firewood~~ harvest of dead or downed trees.	• ~~Other~~ Subsistence uses of standing live timber require a permit~~.~~ o Question: Looking at the recommendation regarding small bridges, should this bullet say "unless otherwise specified in writing"?
Harvest Limit	• Dead and downed for firewood: No limit for subsistence firewood harvest of dead or downed trees. • Subsistence house and cabin log permits: up to 120 trees, including both dead and downed. Any trees damaged during cutting or transportation operations will be felled and utilized and will count as part of the total number of trees authorized by this permit Availability of downed timber on both private and public lands may be considered in determining number of standing trees harvested from park land. • Subsistence firewood permits (standing live only): amount reasonably needed for heating and cooking in primary place of residence. May be issued annually. • Other subsistence purposes: case-by-case.	• No limit for subsistence ~~firewood~~ harvest of dead or downed trees.	• Subsistence house and cabin log permits: up to 120 trees, including both dead and downed. Any trees damaged during cutting or transportation operations will be felled and utilized and will count as part of the total number of trees authorized by this permit.. • Subsistence firewood permits (standing live only): amount reasonably needed for heating and cooking in primary place of residence. May be issued annually. The first-year permit may include sufficient logs to allow green firewood to season for the next year. • Other subsistence purposes: case-by-case.

[1] Purple text is additions from draft policy relating to standing timber for purposes other than firewood.
[2] Column contents generally reflect work group discussions regarding downed or standing dead trees, including conditions the work group felt should only apply to standing live trees. Plus draft policy language related to standing timber for purposes other than firewood (in purple).

Conditions	Draft Policy	Draft SRC Recommendation for Dead or Downed Timber	Draft SRC Recommendation for Standing Live Timber[2]
Stump Height	• Stumps will be cut as low to the ground as possible with a maximum 6" height above the ground or snow surface.	• Stumps will be cut as low to the ground as possible with a maximum ~~6~~12" height above the ground surface or the snow surface.	• Stumps will be cut as low to the ground as possible with a maximum ~~6~~12" height above the ground surface or the snow surface.
Branch Disposal	• Slash/branches must be lopped and scattered, with pieces not greater than five feet in length. • Depositing slash in running or standing water is prohibited.	• ~~Slash/branches must be lopped and scattered, with pieces not greater than five feet in length.~~ • ~~Depositing slash in running or standing water is prohibited~~.	• ~~Slash/branches must be lopped and scattered, with pieces not greater than five feet in length.~~ • ~~Depositing slash in running or standing water is prohibited~~.
Waterbody Restrictions	• Harvest is prohibited within 100 feet of stream banks.	• ~~Harvest is prohibited within 100 feet of stream banks.~~	• Harvest of standing live timber is prohibited within ~~100~~ 25 feet of stream banks.
Harvest Location Restrictions	• All cultural resources will be avoided. The permittee will not injure, alter, destroy, or collect any cultural resource site, object, or structure. If a cultural resource is inadvertently discovered by the permitted activities, the permittee will cease the activity, protect the resource, and notify the park Superintendent immediately. • Harvest using thinning techniques, no clearcutting. For permits: The permit may specify a minimum spacing between harvested trees. • Harvest is prohibited within 200 feet of private property not owned by the harvester, and from slopes steeper than 30 percent (i.e., 30-foot change in elevation over a 100-foot horizontal distance).	• All cultural resources will be avoided. The harvester[3] 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 the 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.~~, and from slopes steeper than 30 percent (i.e., 30-foot change in elevation over a 100-foot horizontal distance).~~	• All cultural resources will be avoided. The permittee will not injure, alter, destroy, or collect any cultural resource site, object, or structure. If a cultural resource is inadvertently discovered by the permitted activities, the permittee will cease the 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. • 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).

[3] Minor wording changes in this cell reflecting that no permit is required.

Conditions	Draft Policy	Draft SRC Recommendation for Dead or Downed Timber	Draft SRC Recommendation for Standing Live Timber[2]
Transportation-Related Restrictions	• No new roads or trails may be constructed. • 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. The end of the log with the largest diameter will be suspended or on a sled during skidding activities. Log skidding operations will cease if ground disturbance occurs. • Limbs on harvested trees must be removed before they are skidded out of the stand. • During periods when the ground is not frozen and snow covered, harvested logs must be transported in a way that does not involve skidding, for example, by bucking up and loading onto an off-road vehicle or associated trailer. • 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.	• No new 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. ~~The end of the log with the largest diameter will be suspended or on a sled during skidding activities.~~ Log skidding operations will cease if ground disturbance occurs~~.~~ • ~~Limbs on harvested trees must be removed before they are skidded out of the stand~~. • During periods when the ground is not frozen and snow covered, harvested logs must be transported in a way that does not involve serious ground disturbance. ~~skidding, for example, by bucking up and loading onto an off-road vehicle or associated trailer.~~	• No new 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. ~~The end of the log with the largest diameter will be suspended or on a sled during skidding activities.~~ Log skidding operations will cease if ground disturbance occurs~~.~~ • ~~Limbs on harvested trees must be removed before they are skidded out of the stand~~. • During periods when the ground is not frozen and snow covered, harvested logs must be transported in a way that does not involve serious ground disturbance. ~~skidding, for example, by bucking up and loading onto an off-road vehicle or associated trailer.~~ • 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.

Conditions	Draft Policy	Draft SRC Recommendation for Dead or Downed Timber	Draft SRC Recommendation for Standing Live Timber[2]
Other Conditions	• Use of portable motorized chainsaws (no more than 5 horsepower) is authorized to harvest logs for subsistence firewood as *described in this section (for harvest not requiring a permit)/ Permits issued for subsistence log harvest will include authorization for use of portable motorized chainsaws to facilitate harvest.* • *All spills of oil, petroleum products, and hazardous substances associated with 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.* • *All refuse, equipment and personal property must be removed from the harvest area upon completion of harvest for the season (for harvest not requiring a permit)/ by the expiration date of the permit.*	• Use of portable motorized chainsaws (no more than ~~5~~10 horsepower) is authorized to harvest logs for subsistence ~~firewood~~ purposes as described in this section. • All spills of oil, petroleum products, and hazardous substances associated with 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. • All ~~refuse~~ garbage, equipment and personal property must be removed from the harvest area upon completion of harvest for the season.	• Use of portable motorized chainsaws (no more than ~~5~~10 horsepower) is authorized to harvest logs for subsistence ~~firewood~~ purposes as described in this section. • All spills of oil, petroleum products, and hazardous substances associated with 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. • All ~~refuse~~ garbage, equipment and personal property must be removed from the harvest area by the expiration date of the permit.

Eligibility/Application requirements:

Subsistence house logs:

- Logs may only be used for a primary place of residence on non-NPS managed lands within the park boundary. Subsistence house logs may also be used to build associated outbuildings such as a shed for firewood or outhouse.
- Permits will only be issued for locations off the road system, defined as roads maintained by the Alaska Department of Transportation and Public Facilities (DOT&PF) on at least a seasonal basis along with community and neighborhood roads that are passable by standard 4-wheel drive passenger cars and trucks and are connected to the DOT&PF-maintained roads.
- Applicant must demonstrate a significant need for logs and provide evidence of exploring reasonable alternative sources for logs such as logs from state, private or university lands; or by transporting logs harvested outside the park to the building site.
- Applicant must submit a rough plan or sketch of the house, including dimensions and the proposed method of construction.
- An additional subsistence house log permit will not be issued to the same landowner/family for a period of 10 years after the previous permit was issued. This condition applies to any land subdivided or transferred subsequent to the issuance of the original subsistence house log permit. The one exception to this is that an additional subsistence house log permit may be issued if justified due to emergency or unusual and unforeseen circumstances such as fire or other damage.
- Subsistence house logs may not be used for commercial purposes (sale of whole logs or sale of lumber cut from subsistence logs) or in structures used for commercial purposes such as lodges or rental cabins.

Subsistence cabin logs:

- Subsistence cabin log permits will only be issued for the construction of shared-use subsistence cabins on federal public lands within Wrangell-St. Elias National Park and Preserve.
- Permits will only be issued for subsistence cabins in remote locations at least 10 miles off the road system.
- Applicant must provide evidence of having explored other options for shelter during subsistence activities such as use of a temporary structures or existing public-use, shared subsistence-use, or undesignated cabins.
- For subsistence cabins in designated wilderness, the application must state whether the cabin replaces a previous structure that is no longer structurally sound or usable or is in a location that did not previously have a subsistence cabin.
- Subsistence cabin logs may not be used for commercial purposes (sale of whole logs or sale of lumber cut from subsistence logs), in structures used for commercial purposes such as lodges, or in structures constructed on private land.

Subsistence firewood permits (standing live timber):

- Applicant will be limited to what is reasonably needed for purposes of heating, cooking, etc. at the primary place of residence. The first-year permit may include sufficient logs to allow green firewood to season for the next year.
- Applicants must also demonstrate that they do not have reasonable access to standing dead or downed timber for use as firewood.
- Subsistence firewood permits may be issued on a yearly basis.
- Green logs granted for firewood use may be used only for that purpose and may not be used for house construction, saw timber, or other uses unless specifically authorized on the permit.

WRST SRC Working Group Recommendation Regarding Use of Small Bridges for Subsistence Access:

Background:

When one of the working group members grew up, his family ran a 300-mile trapline. Occasionally they ran across spring-fed streams that didn't freeze properly. They would knock down a couple of trees, put down the branches as cross-pieces, and go across. There are bridges like this all over the park, and he would like them to be made legal for general subsistence purposes. Others on the work group said that they or their parents also did this. Local, natural materials are used. Additionally, it is not a permanent installation. In the spring, the river washes the bridge away.

Work Group Recommendation:

The following is authorized for the construction of small bridges to use for subsistence access:

The harvest of up to 5 live standing trees greater than 3 inches in diameter at ground height along with an unlimited number of standing dead or downed trees[1] is authorized without need for an individual permit. Additional materials not requiring a permit (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 for decking/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 are 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.

[1] This is needed because current regulations require a permit for the harvest of standing dead timber for purposes other than firewood as well as for the harvest of standing live timber for any subsistence purpose.

National Park Service regulations related to timber harvests
(all from 36 Code of Federal Regulations)

§ 1.6 Permits.

(a) When authorized by regulations set forth in this chapter, the superintendent may issue a permit to authorize an otherwise prohibited or restricted activity or impose a public use limit. The activity authorized by a permit shall be consistent with applicable legislation, Federal regulations and administrative policies, and based upon a determination that public health and safety, environmental or scenic values, natural or cultural resources, scientific research, implementation of management responsibilities, proper allocation and use of facilities, or the avoidance of conflict among visitor use activities will not be adversely impacted.

(b) Except as otherwise provided, application for a permit shall be submitted to the superintendent during normal business hours.

(c) The public will be informed of the existence of a permit requirement in accordance with § 1.7 of this chapter.

(d) Unless otherwise provided for by the regulations in this chapter, the superintendent shall deny a permit that has been properly applied for only upon a determination that the designated capacity for an area or facility would be exceeded; or that one or more of the factors set forth in paragraph (a) of this section would be adversely impacted. The basis for denial shall be provided to the applicant upon request.

(e) The superintendent shall include in a permit the terms and conditions that the superintendent deems necessary to protect park resources or public safety and may also include terms or conditions established pursuant to the authority of any other section of this chapter.

(f) A compilation of those activities requiring a permit shall be maintained by the superintendent and available to the public upon request.

(g) The following are prohibited:

(1) Engaging in an activity subject to a permit requirement imposed pursuant to this section without obtaining a permit; or

(2) Violating a term or condition of a permit issued pursuant to this section.

(h) Violating a term or condition of a permit issued pursuant to this section may also result in the suspension or revocation of the permit by the superintendent.

§ 5.7 Construction of buildings or other facilities. Constructing or attempting to construct a building, or other structure, boat dock, road, trail, path, or other way, telephone line, telegraph line, power line, or any other private or public utility, upon across, over, through, or under any park areas, except in accordance with the provisions of a valid permit, contract, or other written agreement with the United States, is prohibited.

§ 13.1 Definitions: Temporary means a continuous period of time not to exceed 12 months, except as specifically provided otherwise. (See also 13.166)

§ 13.166 Temporary facilities. A temporary facility or structure directly and necessarily related to the taking of subsistence resources may be constructed and used by a qualified subsistence user without a permit so long as such use is for less than thirty days and the site is returned to a natural condition. The Superintendent may establish conditions and standards governing the use or construction of these temporary structures and facilities which shall be published annually in accordance with § 1.7 of this chapter.

§ 13.485 Subsistence use of timber and plant material.

(a) Notwithstanding any other provision of this part, the non-commercial cutting of standing timber by local rural residents for appropriate subsistence uses, such as firewood or house logs, may be permitted in park areas where subsistence uses are allowed as follows:

(1) For standing timber of diameter greater than three inches at ground height, the Superintendent may permit cutting in accordance with the specifications of a permit if such cutting is determined to be compatible with the purposes for which the park area was established; and

(2) For standing timber of diameter less than three inches at ground height, cutting is authorized unless restricted by the Superintendent.

(b) The gathering by local rural residents of fruits, berries, mushrooms, and other plant materials for subsistence uses, and the gathering of dead or downed timber for firewood for noncommercial subsistence uses, shall be allowed without a permit in park areas where subsistence uses are allowed.

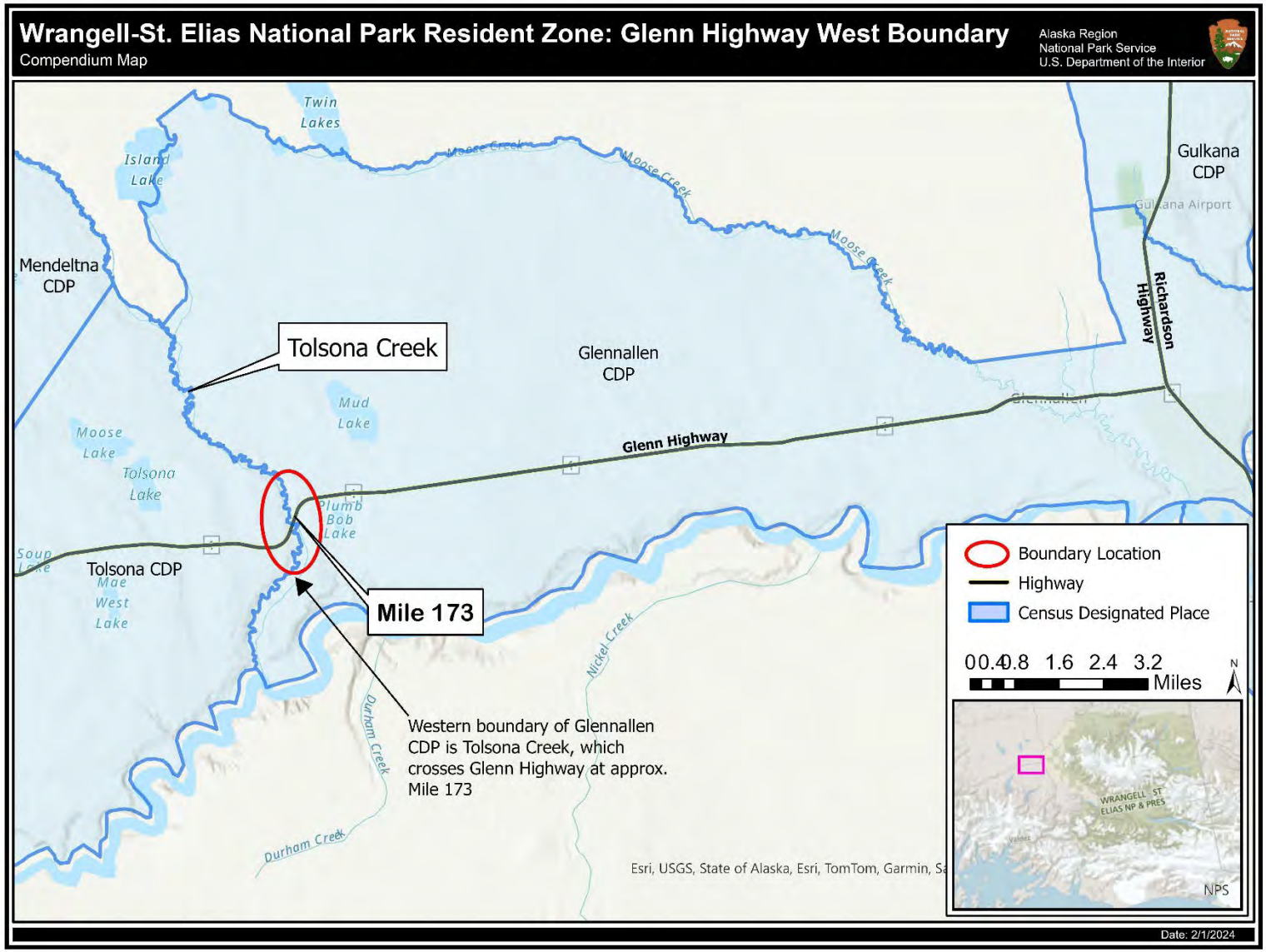
Comparison of Firewood Harvest Provisions in Nearby State and Federally Managed Lands (11/14/22)

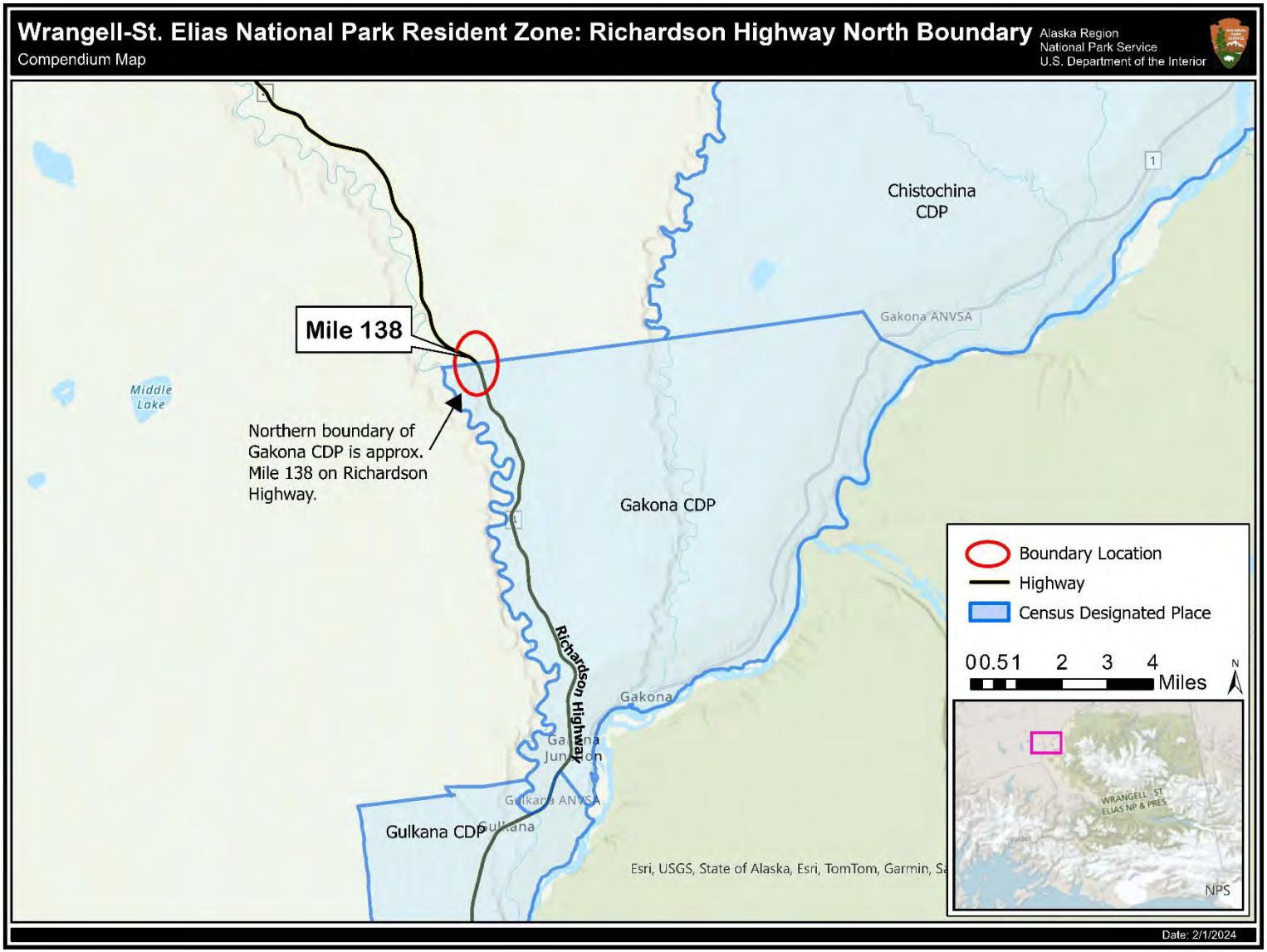
Land Management Agency	Permit Provisions	Harvest Limit	Stump Height	Branch Disposal
Alaska Department of Natural Resources, Division of Forestry	• A permit is required • Permit is valid for 12 months from issuing	• 10 cords of firewood a year	• No more than 12 inches high	• Not specified
Bureau of Land Management (Glennallen Field Office)	• A permit is required	• 10 cords of firewood a year • Only dead wood may be harvested	• No more than 12 inches high	• Must cut and scatter branches • Do not leave higher than 18 inches above the forest floor • No slash shall be left in or where it may accumulate in any bodies of water • All slash must be removed to a point at least 25 feet from existing roads and/or trails
U.S. Forest Service (Chugach National Forest)	• A permit is required	• 25 cords of firewood a year • Only dead or downed trees may be harvested	• No more than 12 inches high • Less than 12 inches preferred	• Branches must be taken 25 feet into the woods • Do not leave in ditches by the road
U.S. Fish and Wildlife Service (Alaska Region) Tetlin National Wildlife Refuge Kenai National Wildlife Refuge	• A permit is not required for subsistence users • No permit required for dead/downed trees (during the same time when general public can harvest downed trees with a permit) • A special use permit is required for live trees	• For subsistence users, no limit for dead or downed trees • For live trees, no more than 20 trees between 3-6 inches in diameter can be cut in a year. • For general public, 5 cords of a firewood a year	• Not specified	• Not specified
University of Alaska Land Management Office	• A permit is required • The permit is valid for 90 days from issuing	• 10 cords of firewood a year	• Not specified	• Not specified

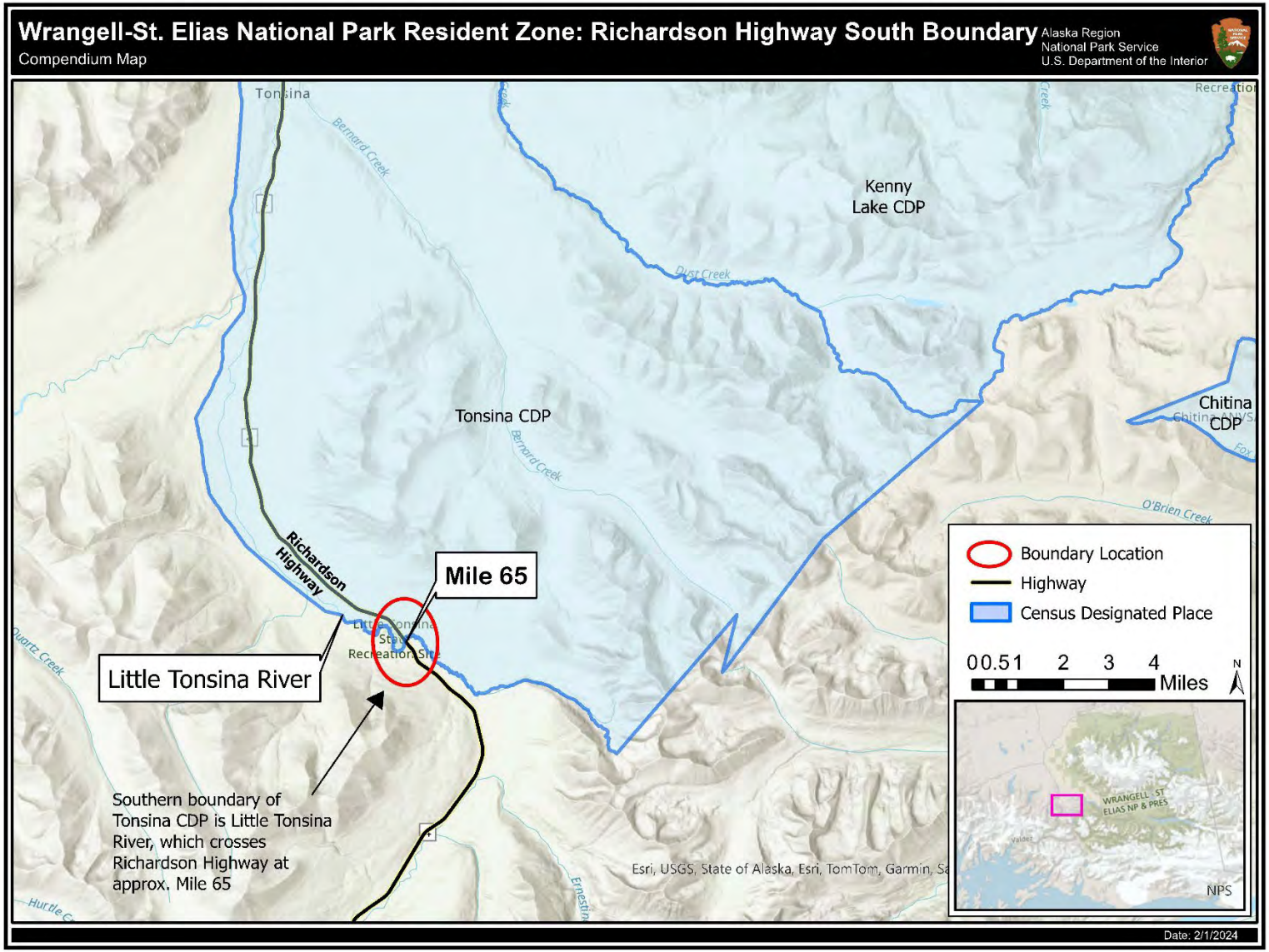
Comparison of Firewood Harvest Provisions in Nearby State and Federally Managed Lands (cont.)

Land Management Agency	Waterbody Restrictions	Harvest Location Restrictions	Transporting Firewood Restrictions
Alaska Department of Natural Resources, Division of Forestry	• No cutting within 300 feet of any water body • No cutting within 100 feet of any muskeg	• Cut only in areas designated on the map • Cut in areas marked in the field with ribbons or signage	• Do not create new roads • You may use existing logging roads • Do not haul during periods of wet ground
Bureau of Land Management (Glennallen Field Office)	• No cutting within 100 feet of any water body	• Not specified	• No new roads or trails shall be constructed • No motorized vehicles are permitted within the harvest area when the ground in not frozen and covered by at least 4 inches of snow • No heavy equipment allowed without written approval by the Authorized Officer
U.S. Forest Service (Chugach National Forest)	• No cutting within 120 feet of identified fish-bearing streams	• No cutting within 150 yards of a developed recreation site, unless authorized by permit • Need a permit to cut in Timber Sale Areas and Log Decks	• Do not drive off existing roadways unless authorized via permit
U.S. Fish and Wildlife Service (Alaska Region) Tetlin National Wildlife Refuge Kenai National Wildlife Refuge	• In Tetlin, no cutting of live trees within 50 feet of a stream • No other regulations specified	• Not specified	• Must utilize existing roads within the refuges
University of Alaska Land Management Office	• Not specified	• Only trees clearly marked with ribbon or signage	• No new roads or trails may be created

Wrangell-St. Elias National Park Resident Zone Proposed Boundary Maps




Wrangell-St. Elias National Park Resident Zone: Richardson Highway North Boundary
Compendium Map
Alaska Region
National Park Service
U.S. Department of the Interior
Chistochina CDP
Mile 138
Gakona ANVSA
Middle Lake
Northern boundary of Gakona CDP is approx. Mile 138 on Richardson Highway.
Gakona CDP
Richardson Highway
Gakona
Gulkana ANVSA
Gulkana CDP
Boundary Location
Highway
Census Designated Place
0 0.5 1 2 3 4 Miles
N
WRANGELL - ST ELIAS NP & PRES
NPS
Esri, USGS, State of Alaska, Esri, TomTom, Garmin,
Date: 2/1/2024


Wrangell-St. Elias National Park Resident Zone: Richardson Highway South Boundary
Compendium Map
Alaska Region
National Park Service
U.S. Department of the Interior
Tonsina
Barnard Creek
Kenny
Lake CDP
Dust Creek
Tonsina CDP
Chitina
CDP
O'Brien Creek
Richardson
Highway
Mile 65
Little Tonsina River
Quartz Creek
Southern boundary of
Tonsina CDP is Little Tonsina
River, which crosses
Richardson Highway at
approx. Mile 65
Boundary Location
Highway
Census Designated Place
0 0.5 1 2 3 4
Miles
N
WRANGELL-ST
ELIAS NP & PRES
NPS
Esri, USGS, State of Alaska, Esri, TomTom, Garmin,
Date: 2/1/2024

FP25–03a Executive Summary	
General Description	Proposal FP25-03a requests that the Board recognize the customary and traditional use of salmon in the Chitina Subdistrict of the Upper Copper River District by residents of Tolsona. *Submitted by: Tolsona Community Corporation*
Proposed Regulation	**Customary and Traditional Use Determination—Salmon** **PRINCE WILLIAM SOUND AREA** *Chitina Subdistrict of the Upper Copper River District* — *Residents of Cantwell, Chickaloon, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Paxson-Sourdough, Slana, Tanacross, Tazlina, Tetlin,* ***Tolsona****, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road.*
OSM Preliminary Conclusion	**Support**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 Oppose**

DRAFT STAFF ANALYSIS
FP25-03a

ISSUES

Proposal FP25-03a, submitted by Tolsona Community Corporation, requests that the Federal Subsistence Board (Board) recognize the customary and traditional use of salmon in the Chitina Subdistrict of the Upper Copper River District by residents of Tolsona.

DISCUSSION

The proponent of FP25-03a states that residents of Tolsona have customarily and traditionally harvested salmon in the Chitina area. The proponent describes Tolsona as a small community with strong ties between residents who rely upon one another to survive in an environment that lacks economic opportunities. Residents rely upon, and share, a diverse set of resources locally and in the wider region. The proponent states that depending on the year, up to 70% of residents use subsistence resources. Tolsona Community Corporation provided written information submitted with the proposal describing residents' histories of fishing in the O'Brien Creek south of the Chitina-McCarthy Road Bridge. Finally, the proponent states that use of subsistence resources is vital not only to the survival of Tolsona residents but also to their sense of identity and connection to others.

Companion proposal FP25-03b, also submitted by Tolsona Community Corporation, requests that the Federal Subsistence Board (Board) recognize the customary and traditional use of freshwater fish in the Copper River drainage upstream from Haley Creek by residents of Tolsona.

Existing Federal Regulation

Customary and Traditional Use Determination—Salmon

PRINCE WILLIAM SOUND AREA

Chitina Subdistrict of the Upper Copper River District	*Residents of Cantwell, Chickaloon, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Paxson-Sourdough, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road.*

Proposed Federal Regulation

Customary and Traditional Use Determination—Salmon

PRINCE WILLIAM SOUND AREA

Chitina Subdistrict of the Upper Copper River District	*Residents of Cantwell, Chickaloon, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Paxson-Sourdough, Slana, Tanacross, Tazlina, Tetlin,* ***Tolsona****, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road.*

Extent of Federal Public Lands/Waters

For purposes of this discussion, the phrase "Federal public waters" is defined as those waters described under 36 CFR 242.3 and 50 CFR 100.3. The area affected by this proposal is the Federal public waters of the Chitina Subdistrict of the Upper Copper River District within and adjacent to the exterior boundaries of Wrangell-St. Elias National Park and Preserve (See **Map 12, Prince William Sound Area** in the Federal Subsistence Fish and Shellfish Management Regulations Booklet).

The Upper Copper River District is composed of the Chitina and Glennallen Subdistricts. The Subdistricts are geographically defined in the same way in Federal and State regulation. The Chitina Subdistrict consists of all waters of the mainstem Copper River downstream of the downstream edge of the Chitina-McCarthy Road Bridge to an east-west line crossing the Copper River approximately 200 yards upstream of Haley Creek, as designated by Alaska Department of Fish and Game (ADF&G) regulatory markers, a distance of approximately ten miles (**Figure 1**). The Glennallen Subdistrict consists of all waters of the mainstem Copper River from the mouth of the Slana River downstream to the downstream edge of the Chitina-McCarthy Road Bridge, a distance of approximately 120 miles.

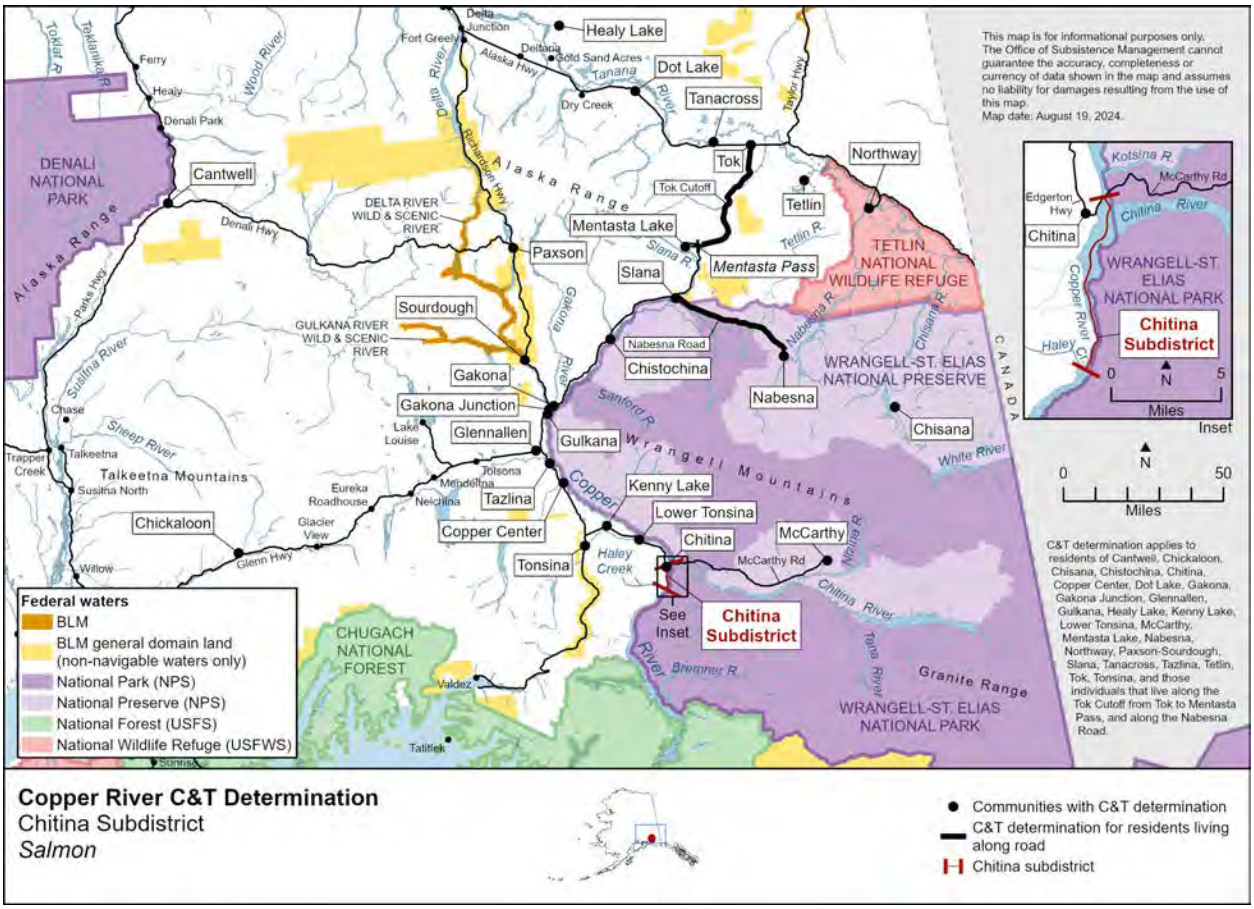


Figure 1. Communities and areas with a customary and traditional use determination for salmon in the Chitina Subdistrict of the Upper Copper River District.

Regulatory History

In 1992, the Federal Subsistence Management Program promulgated regulations governing the harvest of fish for subsistence uses in non-navigable waters within and adjacent to Federal public lands (57 Fed. Reg. 22940 [May 29, 1992]). In 1999, the Board also adopted Federal regulations for fish in navigable waters within and adjacent to Federal public lands where there is a Federal reserved water right (64 Fed. Reg. 1276 [January 8, 1999]).

Chitina Subdistrict: Salmon

In 1999 the Federal Subsistence Management Program adopted State subsistence fishery regulations, including those for the Copper River. At that time, the State classified the Chitina Subdistrict as a personal use fishery (it continues to be classified this way today), and the new Federal regulations prohibited the take of salmon in the Chitina Subdistrict (64 Fed. Reg. 1309 [January 8, 1999]). The new Federal regulations did not initially include a customary and traditional use determination for salmon specific to the Chitina Subdistrict; however, the Chitina Subdistrict is geographically within what was then called the "Copper River District—remainder" (i.e., the area outside of the Glennallen Subdistrict), for which a customary and traditional use determination was established for residents of

the Prince William Sound Area (64 Fed. Reg. 1300 [January 8, 1999]). The 1999 regulations also established a customary and traditional use determination for the Glennallen Subdistrict for all residents of the Prince William Sound Area. The regulatory history of the Glennallen Subdistrict is not detailed further here.

Over the next six years, the Board authorized a Federal subsistence fishery in the Chitina Subdistrict, created a customary and traditional use determination specific to salmon in the Chitina Subdistrict, and then incrementally added communities. During this time the Board also rejected requests to add two communities to the determination, Delta Junction and Lake Louise. Details of the regulatory history for the customary and traditional use determination for salmon in the Chitina Subdistrict between 2000 and 2006 are given below.

In 2000, the Board adopted Proposal FP01-15, which established a customary and traditional use determination for salmon in the Chitina Subdistrict for residents of Chitina, Cantwell, Chistochina, Copper Center, Gakona, Gulkana, Mentasta, and Tazlina.

In 2001, the Board adopted proposal FP02-16, submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, to add the remaining communities in the resident zone of the Wrangell-St. Elias National Park (Chisana, Dot Lake, Gakona Junction, Glennallen, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Nabesna, Northway, Slana, Tanacross, Tetlin, Tok, Tonsina, and those individuals living along the Tok cutoff from Tok to Mentasta Pass, and along the Nabesna Road) to the customary and traditional use determination for salmon in the Chitina Subdistrict.

In 2002, the Board rejected proposals FP03-11 and FP03-12 to add residents of Delta Junction and Lake Louise, respectively, to the customary and traditional use determinations for salmon in the Chitina Subdistrict. The proposals were rejected through the consent agenda; the stated justification was lack of substantial evidence.

In 2003, the Board adopted proposal FP04-19, submitted by the ADF&G Paxson Fish and Game Advisory Committee, which requested that the residents of the Paxson-Sourdough area be added to the customary and traditional use determination for salmon in the Chitina Subdistrict.

In 2005, the Board adopted FP05-14, submitted by Chickaloon Village Traditional Council, which requested that Chickaloon be added to the Chitina Subdistrict customary and traditional use determination for salmon. No changes have been made to the customary and traditional use determination for salmon in the Chitina Subdistrict since this time.

In 2023, the Board rejected FP23-14, submitted by residents of Serendipity subdivision, requesting addition of residents of the Serendipity subdivision to the customary and traditional use determination for salmon in the Chitina Subdistrict of the Upper Copper River District. The Board rejected FP23-14 in deference to the Southcentral Regional Advisory Council, which felt that the residents of Serendipity did not fully demonstrate the criteria necessary to be recognized for customary and traditional use of salmon in the Chitina Subdistrict, particularly with regard to long-term patterns of use

(development of the Serendipity subdivision began in 2000). The Council wanted to see additional research conducted into the community. They also noted that none of the community members spoke in support of their proposal at the Council meeting, though this is not a requirement.

Also in 2023, the Board rejected FP23-15/16, submitted by the ADF&G Upper Tanana/Fortymile Advisory Committee, which requested that the Board recognize the customary and traditional use of salmon in the Chitina Subdistrict by permanent rural residents who live between the named communities along the Alaska Highway from the U.S./Canada border to Dot Lake. The Board rejected FP23-15/16 in deference to the Southcentral and Eastern Interior Regional Advisory Councils and due to lack of proximity or substantial evidence for a long-term pattern of use and sharing of the resource.

The Board has not previously received or considered a proposal to add Tolsona to the customary and traditional use determination for salmon in the Chitina Subdistrict. **Figure 1** shows the current communities with customary and traditional use determinations for salmon in the Chitina Subdistrict.

Currently, Federal Regulations for the Upper Copper River District (Glennallen and Chitina Subdistricts) require users to have a subsistence fishing permit and allow the use of fish wheel, dip net, and rod and reel gear for the take of salmon. Households of federally qualified subsistence users who have a customary and traditional use determination in both subdistricts may be issued a permit for each.

State regulations allow subsistence fishing in the Glennallen Subdistrict, but not in the Chitina Subdistrict. The Chitina Subdistrict is designated as a State personal use fishery. Under State regulations, permits can only be issued for either the Glennallen Subdistrict subsistence fishery or the Chitina Subdistrict personal use fishery in the same year, but not both. Fish wheels and dip nets are allowed in the Glennallen Subdistrict, but a household may not use both in the same year. Only dip nets are allowed in the Chitina Subdistrict under State regulations.

Community Characteristics

The small community of Tolsona is located at the base of Tolsona Mountain, about 14 miles from Glennallen and four hours from Anchorage (Holen et al. 2015). The community is located in traditional Ahtna Territory and in Units 13A and 13D. This analysis follows ADF&G, Division of Subsistence in defining the boundaries of Tolsona according to the 2020 U.S. Census (Holen et al. 2015, **Figure 2**). 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). There is little information readily available specific to the history of Tolsona as a community. Tolsona is not an Alaska Native community, although the name “Tolsona,” associated with Tolsona River and Tolsona Lake, is Athabascan in origin (Holen et al. 2015). The name Tolsona first appeared in a USGS publication in 1915 (Holen et al. 2015). Present-day Tolsona, Nelchina, and Mendeltna are small Glenn Highway communities that lack distinct population centers and are “interconnected residentially and economically” with one another (Holen et al. 2015).

The Tolsona Census Designated Place (CDP) (**Figure 2**) is relatively new, dating to the 2000 U.S. Census (Holen et al. 2015; U.S. Census Bureau 1990, 2000). An important study of subsistence use by communities in the region dating to the 1980s did not include Tolsona, but did include the adjacent communities of Mendeltna and Glennallen (Reckord 1983). In two early subsistence surveys conducted by ADF&G, the present-day Tolsona area was included as part of an extended East Glenn Highway area, but Tolsona was not specifically named in either (Stratton and Georgette 1984; McMillan and Cuccarese 1988).

In 2023, Tolsona had an estimated population of 11 residents, down from 30 in 2010 (ADLWD 2024a; U.S. Census Bureau 2010). Since the Tolsona CDP was created in 2000, the highest population estimate or count occurred in 2013, when the population was estimated to be 33 (ADLWD 2009, 2015, 2017, 2018, 2019, 2024a). Many Tolsona residences are seasonal (Holen et al. 2015); however, population estimates are based on U.S. Census data, which uses the concept of self-reported "usual residence" to determine where people are counted; therefore it is unlikely that any seasonal residents are included in the census data on which the Alaska Department of Labor and Workforce Development's estimates are based (ADLWD 2019). In 2013, ADF&G, Division of Subsistence found that the mean length of residency in Tolsona was 23 years (Holen et al. 2015).

In comparison to Tolsona's estimated population of 11 in 2023, Mendeltna, the closest community to the west, had an estimated population of 47, while Glennallen, the closest community to the east and the hub for the region, had an estimated population of 424 (ADLWD 2024a). Of note, Glennallen has a customary and traditional use determinations for both salmon in the Chitina Subdistrict and freshwater fish in the Copper River drainage upstream from Haley Creek, but Mendeltna and Nelchina do not have a determination for either.

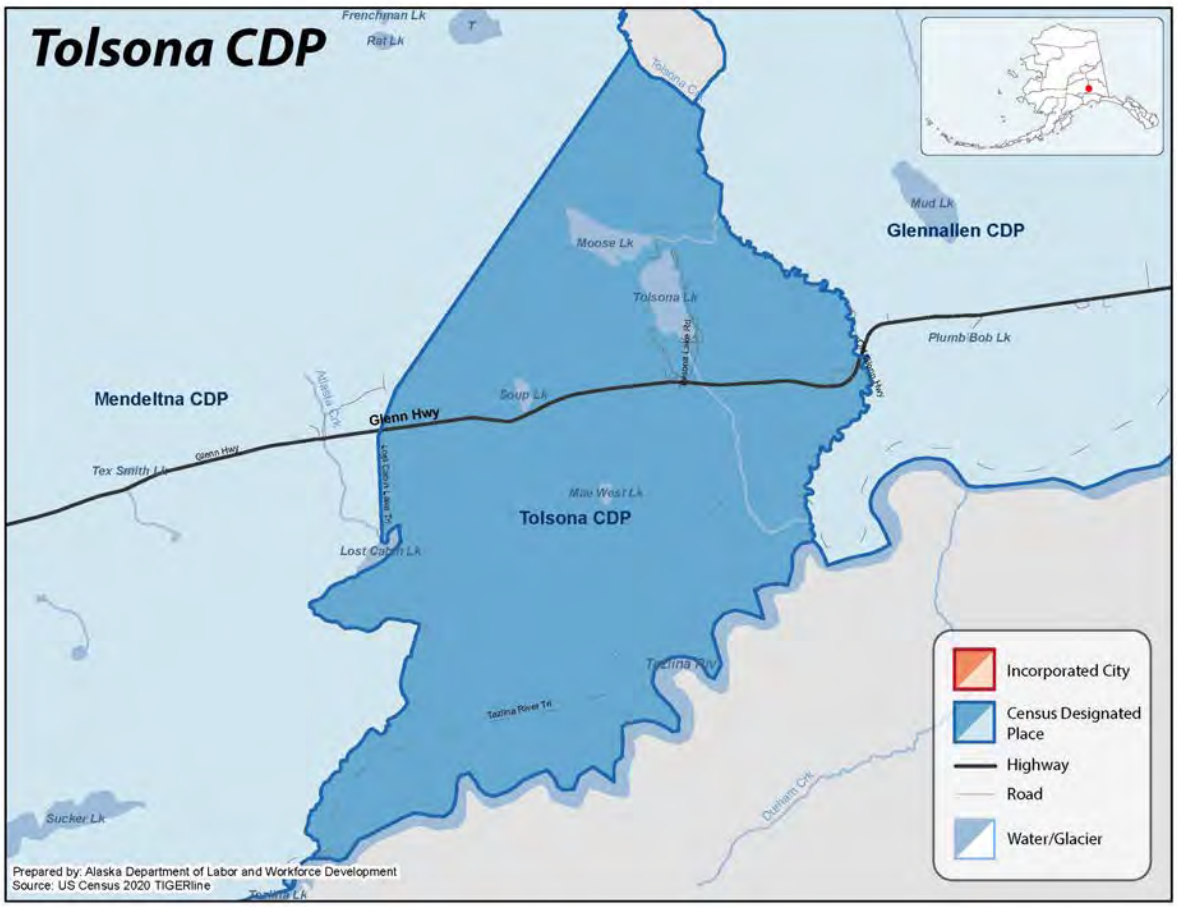


Figure 2. Map of Tolsona CDP from the 2020 U.S. Census (ADLWD 2024b).

When the most recent subsistence survey was conducted in 2013, Tolsona CDP boundaries were found to be out of alignment with respondents' self-reported community of residence along the East Glenn Highway: "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" (Holen et al. 2015:537). Therefore, some people who consider themselves residents of Tolsona but live within the Glennallen CDP already have a customary and traditional use determination for salmon and freshwater fish in the areas considered in this analysis.

As outlined in the Regulatory History section, the Board has never received a proposal to add the East Glenn Highway area collectively, or Tolsona specifically, to the customary and traditional use determinations for salmon in the Chitina Subdistrict or for freshwater fish in the Copper River drainage upstream from Haley Creek. However, as part of the Prince William Sound Area, Tolsona residents are already federally qualified to harvest salmon in the Glennallen Subdistrict of the Upper Copper River District. As residents of the Prince William Sound Area, residents of Tolsona are also federally

qualified to take salmon in the "remainder of the Prince William Sound Area" which includes areas further from Tolsona than the Chitina or Glennallen Subdistricts.

Eight Factors for Determining Customary and Traditional Use

A community or area's customary and traditional use is generally exemplified through the eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

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

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

[1] The "remainder of the Prince William Sound Area" includes that portion not included in the following areas: Southwestern District and Green Island, the area North of a line from Porcupine Point to Granite Point, and south of a line from Point Low to Tongue Point, the Chitina Subdistrict, the Glennallen Subdistrict, or waters of the Copper River between National Park Service regulatory markers located near the mouth of Tanada Creek, and in Tanada Creek between National Park Service regulatory markers identifying the open waters of the creek.

The subsistence practices of the communities that currently possess a customary and traditional use determination for salmon in the Chitina Subdistrict reflect the traditions of the Ahtna, Upper Tanana, and Tanacross as well as those of Euro-American settler/homesteaders. These communities possess numerous interpersonal connections and have a history of sharing subsistence resources, practices, and knowledge. These customary and traditional practices have been well-documented in previous proposal analyses for the Chitina Subdistrict (OSM 2000, OSM 2001).

Comprehensive subsistence surveys conducted by ADF&G, Division of Subsistence provide important information on communities' patterns of subsistence use. Although Tolsona has been surveyed several times, the most useful data for this analysis are those from the 2013 survey year, for reasons that will be explained subsequently. The Tolsona area was first included in a comprehensive subsistence survey conducted by ADF&G for the 1982 to 1983 survey year (Stratton and Georgette 1984) and by a separate entity in partnership with ADF&G for the 1987 study year (McMillan and Cuccarese 1988). Tolsona was most recently surveyed by ADF&G in 2013 (Holen et al. 2015).

In the first two survey years, 1982 and 1987, ADF&G documented subsistence use by residents of a single East Glenn Highway settlement area, which consisted of households "residing in a dispersed pattern along this 43-mile stretch of the Glenn Highway" (Stratton and Georgette 1984:70)[2]. This area includes the present-day settlements of Tolsona, Mendeltna, and Nelchina. The 2013 study year is the only one in which subsistence survey data specific to Tolsona are available. However, data on search and use areas were still presented for the three East Glenn Highway communities combined for the 2013 study year. Therefore, it is impossible to separate mapped information about Tolsona's fishing areas from that for Mendeltna and Nelchina, even for the 2013 study year.

Division of Subsistence interviewed eight out of 14 households in Tolsona about their use of wild resources in 2013. This encompassed 16 out of 24 individuals estimated to be living in the community[3]. Based on the findings of this survey, residents of Tolsona exhibit reliance upon a wide diversity of fish and wildlife resources in the area. Division of Subsistence estimated that 23 out of 24 Tolsona residents harvested wild resources in 2013, and 18 individuals fished (Holen et al. 2015). 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 (Holen et al. 2015; ADF&G 2024). Six out of eight surveyed households shared wild resources with others (Holen et al. 2015).

The importance of a particular resource for a community can be assessed in many ways. Quantitatively, importance can be measured in terms of edible weight harvested and in the percentage of households using a resource. Salmon were important by both definitions, making up an estimated 41% of the total harvest (contributing 128 pounds of food per person) and being used by 88% of surveyed Tolsona

[2] 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. 2015:379). This caused households that were considered part of the East Glenn Highway complex in the two earlier subsistence surveys to be considered Glennallen households in 2013.

[3] That year, Alaska Department of Labor and Workforce Development estimated the population of Tolsona to be 33, significantly higher than ADF&G's estimate of 24 individuals (ADLWD 2015).

households (Holen et al. 2015; ADF&G 2024). Sockeye Salmon was the top resource used by the community in terms of edible weight and tied with moose as the top resource in terms of the percentage of surveyed households using Sockeye Salmon (Holen et al. 2015; ADF&G 2024). The 2013 study year may underrepresent Tolsona residents' typical harvest and use of salmon; of all categories of wild food harvested in 2013, salmon and nonsalmon fish were "reported by the greatest percentage of households as being used less in 2013 than in recent years" (Holen et al. 2015: 214). Wide sharing of a resource also indicates its importance to a community. For the 2013 study year, 50% of surveyed Tolsona households gave away salmon, and 80% received salmon (Holen et al. 2015; ADF&G 2024).

The majority of the Sockeye Salmon harvest was obtained through fish wheels, which are more common in the Glennallen Subdistrict than in the Chitina Subdistrict, with much smaller amounts harvested by rod and reel and dip net (Holen et al. 2015). Chinook salmon were also harvested, making up 4% of the total salmon harvest, with most being harvested with fish wheel, but 33% being harvested by rod and reel (Holen et al. 2015). Coho Salmon were received through sharing and used but not harvested (ADF&G 2024).

Information on handling, preparing, preserving, and storing of salmon by residents of Tolsona is not readily available. Similarly, no information is available regarding handing down of knowledge and values related to salmon fishing. However, written testimony provided by the proponent includes information about families fishing together (**Appendix 1**).

As described previously, salmon harvest locations are only available in combination for the three East Glenn Highway communities of Nelchina, Mendeltna, and Tolsona (Stratton and Georgette 1984; McMillan and Cuccarese 1988; Holen et al. 2015). Information about Tolsona residents' geographical patterns of salmon use is not available separately from that of residents of Nelchina and Mendeltna for any survey year. This limitation constrains findings about the customary and traditional use of salmon in the areas considered in this analysis. However, findings for the East Glenn Highway communities combined are presented here as the best information available.

During the 2013 study year East Glenn Highway residents harvested salmon in many locations, primarily within, but also outside the region. "The Copper River near Chitina" was one of the areas residents of the East Glenn Highway communities fished for Sockeye, Chinook, and Coho salmon within the Copper River Basin (Holen et al. 2015:528). **Figure 2** shows that for Sockeye Salmon this area included the Chitina Subdistrict. Harvest location maps for other salmon species are not available. While this data does show that residents of the East Glenn Highway area fished for salmon in the Chitina Subdistrict of the Upper Copper River District, it does not show whether these fishers included residents of Tolsona specifically.

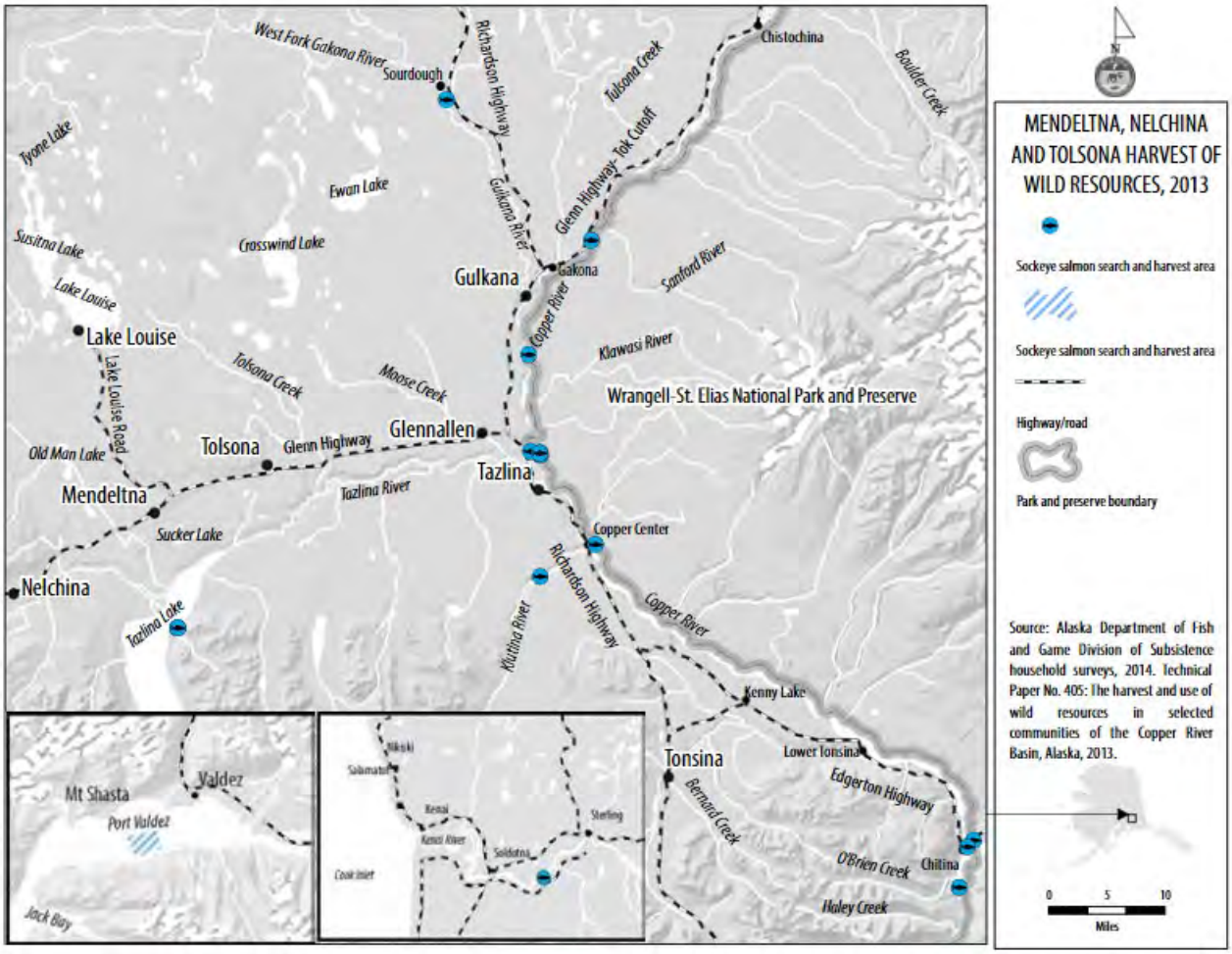


Figure 2. Map showing East Glenn Highway residents' search and harvest areas for Sockeye Salmon in 2013 (Holen et al. 2015).

There is limited information available on the time-depth of salmon use by residents of Tolsona. The primary source of information comes directly from the proponent. As part of their proposal, Tolsona Community Corporation included written testimony about individuals with a history of residency in Tolsona going back to at least 1946. However, it is unknown how many of these individuals are still living in the area. This information is included in **Appendix 1**. Those who provided information referenced personal histories of fishing in O'Brien Creek south of Chitina Bridge over periods of many years, sometimes together with other families, including youth, or both, as well as harvesting and using other subsistence resources in the area. One resident remembered that between 1954 and 1970 there was only one small grocery store in Glennallen, and large Tolsona families "relied on these Copper River salmon as a primary food source."

Fishing under Current Opportunities open to Tolsona Residents

The distance between Tolsona and the Chitina-McCarthy Road Bridge is approximately 85 miles. Currently, residents of Tolsona can fish for salmon in the Chitina Subdistrict under (1) sport fishing

regulations or (2) by participating in the State Chitina personal use dip net fishery. See **Table 1** for a comparison of the season length, gear types, and harvest limits for the Federal subsistence and State personal use fisheries in the Chitina Subdistrict. Salmon sport fishing bag and possession limits are in addition to those allowed under personal use fishing regulations. Sport fishing data specific to residents of Tolsona are not available, but information about Tolsona's fishing in both the State Chitina Subdistrict personal use fishery and the State Glennallen Subdistrict subsistence fishery are included in **Table 2**.

The permit data show that no permits were issued to residents of Tolsona for the State Chitina Subdistrict dip net fishery between 2002 and 2023. However, as shown later in this section, a few Tolsona residents have instead fished in the Federal subsistence Chitina Subdistrict fishery under permits issued in error to people who were not federally qualified subsistence users for the area[4].

For the State Glennallen Subdistrict subsistence fishery, an average of 2.6 permits were issued to residents of Tolsona per year between 2002 and 2023. For context, the estimated population of Tolsona is 11 residents (ADLWDa 2024). Some years of data for the Glennallen Subdistrict are not available because the limited number of permits resulted in ADF&G classifying this information as confidential. For those years in which data are available, residents of Tolsona who fished in the Glennallen Subdistrict under State subsistence regulations harvested an average of 163.3 Sockeye Salmon and 2.8 Chinook Salmon per year (**Table 2;** ADF&G 2024).

Table 1. Comparison of State and Federal regulations pertaining to the Chitina Subdistrict.

	Federal Subsistence Regulations Upper Copper River District	**State Chitina Personal Use Dip Net Regulations**
Season	May 15-Sept. 30	June 7 through September 30 during periods established by Emergency Order
Gear	Fish wheels, dip nets, rod and reel	Dip net

[4] Wrangell-St. Elias National Park and Preserve staff make a concerted effort to screen for permit eligibility, however, Chitina Subdistrict permits have occasionally been issued in error to Tolsona residents. When errors are identified, the permittees are notified that the permits had been issued in error (Cellarius 2024, pers. comm.).

regulations, which are more liberal than the State personal use regulations for Chitina Subdistrict. If the proposal is rejected, residents of Tolsona could continue to harvest salmon in the State personal use dip net fishery or under sport fishing regulations in the Chitina Subdistrict as well as in the Glennallen Subdistrict under Federal subsistence regulations.

OSM PRELIMINARY CONCLUSION

Support FP25-03a.

Justification

Tolsona residents' patterns of fishing exhibit the characteristics of customary and traditional uses of salmon in the Chitina Subdistrict of the Upper Copper River District. Sockeye Salmon is one of the top two most important resources for Tolsona residents in terms of edible weight harvested, as documented in a comprehensive subsistence survey, and is also widely shared. Comprehensive subsistence surveys have not differentiated between salmon search areas used by residents of Tolsona versus residents of the wider East Glenn Highway area, including Mendeltna and Nelchina. While residents of the East Glenn Highway have had the Chitina subdistrict documented as a search area, it is unknown whether this search area was specifically used by residents of Tolsona. However, use of salmon by Tolsona residents within the Chitina Subdistrict has been documented through reported harvest (under Federal permits that were issued in error) and written public testimony from residents of Tolsona.

LITERATURE CITED

ADF&G. 2024. Community Subsistence Information System (CSIS), Alaska Department of Fish and Game, Div. of Subsistence. https://www.adfg.alaska.gov/sb/CSIS/. Retrieved: June 10, 2024.

ADLWD. 2009. Alaska population overview: 2009 estimates. Alaska Department of Labor and Workforce Development. https://live.laborstats.alaska.gov/pop/estimates/pub/09popover.pdf. Retrieved August 2, 2024.

ADLWD. 2015. Alaska population overview: 2013 estimates. Alaska Department of Labor and Workforce Development. https://live.laborstats.alaska.gov/pop/estimates/pub/13popover.pdf. Retrieved August 2, 2024.

ADLWD. 2017. Alaska population overview: 2017 estimates. Alaska Department of Labor and Workforce Development. https://live.laborstats.alaska.gov/pop/estimates/pub/17popover.pdf. Retrieved August 2, 2024.

ADLWD. 2018. Alaska population overview: 2018 estimates. Alaska Department of Labor and Workforce Development. https://live.laborstats.alaska.gov/pop/estimates/pub/18popover.pdf. Retrieved August 2, 2024.

ADLWD. 2019. Alaska population overview: 2019 estimates. Alaska Department of Labor and Workforce Development. https://live.laborstats.alaska.gov/pop/estimates/pub/19popover.pdf. Retrieved August 2, 2024.

ADLWD. 2024a. Alaska population estimates: Cities and census designated places (CDPs), 2020 to 2023. Alaska Department of Labor and Workforce Development: https://live.laborstats.alaska.gov/data-pages/alaska-population-estimates. Retrieved: May 28, 2024.

ADLWD. 2024b. Alaska Department of Labor and Workforce Development: Boundary maps. ADLWD. 2024. https://live.laborstats.alaska.gov/cen/2020-boundaries. Retrieved: June 27, 2024.

Cellarius, B. 2024. Cultural Anthropologist and Subsistence Coordinator. Personal communication: email. Wrangell-St.Elias National Park and Preserve. Copper Center, AK.

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

McMillan, P. and S. Cuccarese. 1988. Alaska over-the-horizon backscatter radar system: Characteristics of contemporary subsistence use patterns in the Copper River basin and upper Tanana area. Vol. I: Synthesis. Arctic Environmental Information and Data Center. Anchorage, AK.

Mulligan, B. 2024. Deputy Commissioner. Personal communication: email. ADF&G. Anchorage, AK.

OSM. 2000. Staff analysis FP01-15. Pages 13-38 *in* Federal Subsistence Board Meeting Materials. December 5-7, 2001. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM. 2001. Staff analysis FP02-16. Pages 73-96 *in* Federal Subsistence Board Meeting Materials. December 11-13, 2001. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM. 2024. Alaska Federal Subsistence Program Database. Retrieved: June 17, 2024.

Reckord, H. 1983. That's the Way We Live: Subsistence in the Wrangell-St. Elias National Park and Preserve.

Stratton, L. and S. Georgette. 1984. Use of fish and game by communities in the Copper River basin, Alaska: A report on a 1983 household survey. ADF&G, Div. of Subsistence. Tech. Paper No. 107. Anchorage, AK.

U.S. Census Bureau. 1990. 1990 Census of Population: General Population Characteristics: Alaska. U.S. Government Printing Office. Washington, DC. https://www2.census.gov/library/publications/decennial/1990/cp-1/cp-1-3.pdf. Retrieved August 2, 2024.

U.S. Census Bureau. 2000. Alaska: 2000 Population and Housing Unit Counts. U.S. Government Printing Office. Washington, DC. https://live.laborstats.alaska.gov/cen/histpdfs/2000pophous.PDF. Retrieved August 2, 2024.

U.S. Census Bureau. 2010. Tolsona CDP: Total population. https://data.census.gov/table/DECENNIALSF12010.P1?q=tolsona%20population%202010. Retrieved June 18, 2024.

U.S. Census Bureau. 2020. Tolsona CDP: Total population. https://data.census.gov/profile?g=160XX00US0278297. Retrieved August 2, 2024.

WRITTEN PUBLIC COMMENT

Subject: Proposal

Federal Subsistence Management Program/Federal Subsistence Board

Re: Proposal FP25-03 Tolsona C&T Freshwater Fish and Salmon in Copper River

To Whom It May Concern:

This letter is in reference to the Tolsona Community's proposal to acquire subsistence rights in the Wrangell St. Elias National Park.

My name is Kirk Wilson. I have been living in the Tolsona community for 43 years. I live on Tolsona Lake right next to the lodge. I have talked with my neighbors and they have not heard anything about this proposal either. The proposer does not represent me in this matter. The Tolsona Community recognizes a land or business owner as a full time resident in order to serve on the local board or directors. This is in direct conflict with the State of Alaska and the United States Federal Government's qualifications as a resident for subsistence rights.

The federal government doesn't recognize a person that is not a permanent resident for use of federal land. I would recommend that you require individuals of Tolsona community to provide proof of their customary and traditional use patterns of the federal land in question. With caribou and moose populations in decline, this is not the time to be adding new user groups. The true subsistence hunter that uses these Federal lands are going through a hard enough time harvesting as it is now.

The people and their families that are listed in the proposal that claim they have historically used federal lands have not lived in the Tolsona community for more than 20 years. Many others have very short lived or questionable residency in the Tolsona community. In addition to residency questionability, the testimony refers to many historical users fishing in O'Brien Creek. This area can be fished by state subsistence permit and would seem to give this group ample opportunity without being federally qualified. It looks as if this group would like to be federally qualified more for hunting than fishing. I do not believe there is 1 person in this group of Ahtna decent.

It would be a shame for the Wrangell St. Elias National Park to approve a proposal where the lion's share of the community have never used these

federal lands for subsistence purposes.

Respectfully,

Kirk Wilson

APPENDIX 1: WRITTEN TESTIMONY ACCOMPANYING PROPOSAL

- John W and Marcy W were friends with O. A. Nelson who owned the Chitina Hotel and local store to serve the Kennecott mine area. They hunted and fished jointly along the railroad tracks leading from Chitina toward McCarthy.
    - Fished in the O'brien Creek (south of the Chitina Bridge) area in the years 1948 - 1969
    - Hunted in the McCarthy Road park and preserve areas for moose, black bear, brown bear, sheep, and goat in the years 1946 - 1969
    - Reported by Clare J, daughter of John and Marcy W, who recalls filling large galvanized wash tubs full of salmon on many fishing trips.
- Willard B often joined John and Marcy W, Clare J (as a child) and other family and friends to jointly dip net salmon from the Copper River.
    - Fished in the O'brien Creek (south of the Chitina Bridge) area in the years 1954 - 1970. There was only one small grocery store in Glennallen and these large families relied on these Copper River salmon as a primary food source.
    - Reported by Clare J, granddaughter of Willard B.
- Wilfred B
    - Fished in the O'brien Creek (south of the Chitina Bridge) area in the years 1954 - 1965.
    - Hunted in the O'brien Creek area for moose, black bear
    - Reported by Clare J, niece of Wilfred B.
- Clare J, born and raised at Atlasta House, Tolsona, Alaska, participated in annual family fishing and hunting trips as a child and continued the family subsistence traditions to this day
    - Fished in the O'brien Creek (south of the Chitina Bridge) area in the years 1960 – 1982
    - Hunted in the McCarthy Road park and preserve areas for moose, black bear in the years 1971 - 1980.
    - This testimony was collected directly from Clare J.
- Gene W
    - Fished in the O'brien Creek (south of the Chitina Bridge) area in the years 1970-1982
    - Hunted in the McCarthy Road park and preserve areas for moose, black bear, brown bear, sheep, and goat in the years 1976 - 1982
    - Gene worked as a registered assistant guide for Frank Pease in the years 1977 - 1980 assisting numerous moose and sheep hunters including Mr. Fonk for moose; Mr. Hotter, Mr. Wenger with sheep; Mr. Thomas with sheep and numerous other clients.
    - Hunted in the Nabesna Road park and preserve areas for moose, black bear, sheep in the years 1976 - 1982
    - This testimony was collected directly from Clare J, the sister of Gene W.
- Ken and Evelyn B
    - Ken and Evelyn operated a guide service within the now park area.
    - They hunted for nutritional use in the national park and preserve areas in the years 1966 through 1991 for both themselves and their daughters Holly and Bebe
    - Hunted multiple species to include sheep, moose, and brown bear
    - Fished in the area south of the Chitina bridge in the same years
    - This testimony was collected by Matt W from Evelyn B during a phone call

- Don W
    - Fished in the Obrien Creek (south of the Chitina Bridge) area in the years 1976-1978
    - Hunted in the McCarthy Road park and preserve areas for moose, black bear, brown bear, sheep, and goat in the years 1998-2003
    - Hunted in the Nabesna Road park and preserve areas for moose, black bear, and brown bear in the years 2008-2010
    - This testimony was collected by Matt W from Don W during a phone call
- Matt W
    - Dip netted (federal) in the Obrien Creek (south of the Chitina Bridge) area in the years 2020-2023
    - Hunted in the McCarthy Road park area for moose in the years 2021 and 2022 and in the preserve area in the year 2023.
    - This testimony was provided directly from Matt W
- Jason S
    - Hunted in the park area for moose in the years 2021 and 2022
    - Dip netted (federal) in the Obrien Creek (south of the Chitina Bridge) area in the years 2021-2023
    - This testimony was collected directly from Jason S
- Steve W
    - Dip netted (federal) in the Obrien Creek (south of the Chitina Bridge) area in 2021
    - This testimony was collected directly from Steve W
- Additional testimony is available from the TCC

FP25–03b Executive Summary	
General Description	Proposal FP25-03b requests that the Board recognize the customary and traditional use of freshwater fish in the Copper River drainage upstream from Haley Creek by residents of Tolsona. *Submitted by: Tolsona Community Corporation*
Proposed Regulation	**Customary and Traditional Use Determination—Freshwater Fish** PRINCE WILLIAM SOUND AREA *Copper River drainage upstream from Haley Creek* — *Residents of Cantwell, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tanacross, Tazlina, Tetlin,* ***Tolsona****, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road.*
OSM Preliminary Conclusion	**Neutral**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 Oppose**

DRAFT STAFF ANALYSIS
FP25-03b

ISSUES

Proposal FP25-03b, submitted by Tolsona Community Corporation, requests that the Federal Subsistence Board (Board) recognize the customary and traditional use of freshwater fish in the Copper River drainage upstream from Haley Creek by residents of Tolsona.

DISCUSSION

The proponent of FP25-03b states that residents of Tolsona have customarily and traditionally harvested fish in the Chitina area. The proponent describes Tolsona as a small community with strong ties between residents who rely on one another to survive in an environment that lacks economic opportunities. Residents rely upon and share a diverse set of resources locally and in the wider region. The proponent states that depending on the year, up to 70% of residents use subsistence resources. Lake fish and river fish are important resources. Finally, the proponent states that use of subsistence resources is vital not only to the survival of Tolsona residents but also to their sense of identity and connection to others.

Companion proposal FP25-03a, also submitted by Tolsona Community Corporation, requests that the Board recognize the customary and traditional use of salmon in the Chitina Subdistrict of the Upper Copper River District by residents of Tolsona. FP25-03a is the master analysis for this set, and the reader is referred to FP25-03a throughout this analysis.

Existing Federal Regulation

Customary and Traditional Use Determination—Freshwater Fish

PRINCE WILLIAM SOUND AREA

Copper River drainage upstream from Haley Creek	*Residents of Cantwell, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road.*

Proposed Federal Regulation

Customary and Traditional Use Determination—Freshwater Fish

PRINCE WILLIAM SOUND AREA

Copper River drainage upstream from Haley Creek	*Residents of Cantwell, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tanacross, Tazlina, Tetlin,* ***Tolsona****, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road.*

Extent of Federal Public Lands/Waters

For purposes of this discussion, the phrase "Federal public waters" is defined as those waters described under 36 CFR 242.3 and 50 CFR 100.3. The area affected by this proposal is the Federal public waters of the Copper River drainage upstream from Haley Creek within and adjacent to the exterior boundaries of Wrangell-St. Elias National Park and Preserve (See **Map 12, Prince William Sound Area** in the Federal Subsistence Fish and Shellfish Management Regulations Booklet). The Federal public waters of the Gulkana National Wild and Scenic River are located within the Copper River drainage upstream from Haley Creek. However, there is a separate customary and traditional use determination for this area. Additionally, there are BLM general domain lands located within the proposal area. On general domain lands, Federal subsistence regulations apply only to non-navigable waters.

Regulatory History

In 1992, the Federal Subsistence Management Program promulgated regulations governing the harvest of fish for subsistence uses in non-navigable waters within and adjacent to Federal public lands (57 Fed. Reg. 22940 [May 29, 1992]). In 1999, the Board also adopted Federal regulations for fish in navigable waters within and adjacent to Federal public lands where there is a Federal reserved water right (64 Fed. Reg. 1276 [January 8, 1999]).

Copper River Drainage Upstream from Haley Creek: Freshwater Fish

In 2001, the Board adopted FP02-15, submitted by the Subsistence Resource Commission for Wrangell-St. Elias National Park, with modification to recognize the customary and traditional use of freshwater fish in the Upper Copper River drainage upstream from Haley Creek by residents of many communities in the region. The communities included: Cantwell, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road. The customary and traditional use determination has not changed since this

time. Since 2001, the Board has received proposals to add Lake Louise and Paxson to the determination but rejected these requests. More detail is given on these requests below.

In 2002, the Board rejected FP03-12, submitted by Office of Subsistence Management, which would have added Lake Louise and Paxson to the customary and traditional use determination for freshwater fish in the Upper Copper River drainage upstream from Haley Creek. The Board rejected the proposal in deference to the Southcentral Alaska Regional Subsistence Advisory Council (Council). The Council stated that there was insufficient evidence to establish a pattern of customary and traditional use. Additionally, the Council stated that it would not be reasonable for Lake Louise and Paxson to travel so far to harvest freshwater fish when they are located adjacent to abundant freshwater fish resources.

In 2003, the Board considered FP04-20, submitted by Paxson Fish and Game Advisory Committee, which requested adding residents of Paxson and those living along the Richardson Highway between milepost 169 and milepost 200 to the customary and traditional use determination for freshwater fish in the Copper River drainage upstream from Haley Creek. The Board instead created a new customary and traditional use determination specific to the Gulkana National Wild and Scenic River and added the Paxson-Sourdough area to that determination. **Figure 1** shows the current communities and areas with customary and traditional use determinations for freshwater fish in the Copper River drainage upstream from Haley Creek.

A subsistence fishing permit is required under Federal regulations for the Prince William Sound Area for fish other than eulachon.

Community Characteristics

See FP25-03a for a discussion of Tolsona's community characteristics.

Eight Factors for Determining Customary and Traditional Use

See FP25-03a for a discussion of the eight factors.

See FP25-03a for information on Tolsona's broad pattern of subsistence use as documented by Alaska Department of Fish and Game's (ADF&G) subsistence surveys of Tolsona and the East Glenn Highway area.

Comprehensive subsistence surveys conducted by ADF&G, Division of Subsistence provide important information on communities' patterns of subsistence use. The 2013 study year is the only one for which subsistence survey data specific to Tolsona are available. During that year, surveyed Tolsona households harvested six different species of freshwater fish, which contributed relatively small amounts of food in terms of weight but were still important components of the harvest, especially in terms of the percentage of household using these species (Holen et al. 2015). Seventy-five percent of surveyed households used Burbot, 63% used Rainbow Trout, 28% used char (Lake Trout and

Grayling), and 25% used whitefish (Humpack, Round, and unknown whitefish) (Holen et al. 2015; ADF&G 2024).

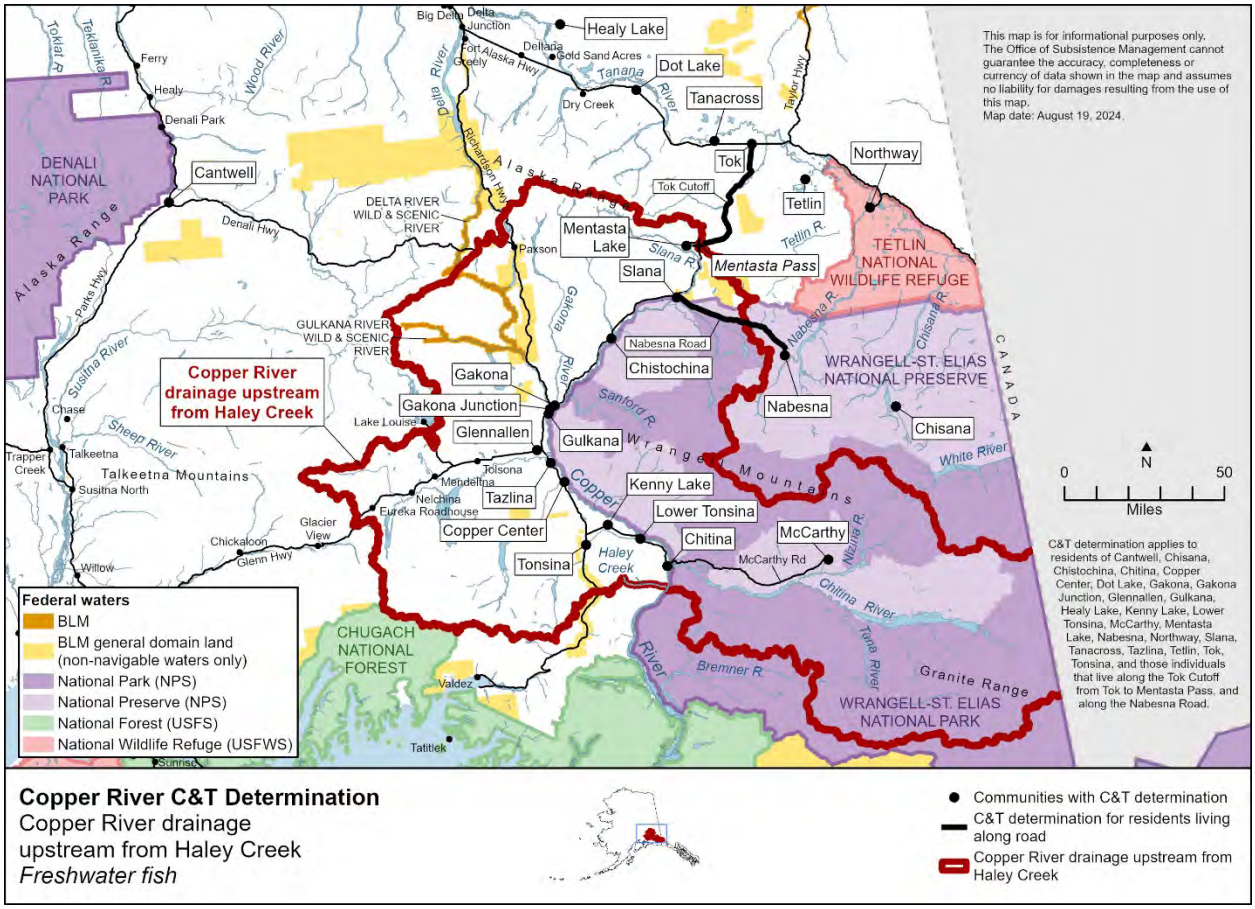


Figure 1. Communities and areas with a customary and traditional use determination for freshwater fish in the Copper River drainage upstream from Haley Creek.

The 2013 study year may underrepresent Tolsona residents' typical harvest and use of nonsalmon fish; of all categories of wild food harvested in 2013, salmon and nonsalmon fish were "reported by the greatest percentage of households as being used less in 2013 than in recent years" (Holen et al. 2015: 214). Half of surveyed households reported experiencing negative impacts from not getting enough nonsalmon fish in particular (Holen et al. 2015). However, it should be noted that the category "nonsalmon fish" includes three marine species in addition to freshwater fish harvested by residents.

In 2013 Burbot were exclusively harvested with subsistence ice fishing gear, whereas Rainbow Trout and Grayling were exclusively caught with rod and reel, and both methods were used for Lake Trout (Holen et al. 2015). Burbot was the most shared freshwater fish, with 50% of households receiving Burbot and 25% giving Burbot away (Holen et al. 2015).

As described in FP25-03a, fish search and harvest locations for Tolsona only, separate from those of Mendeltna and Nelchina, are not available for any survey year. Search area information is only

available in combination for the three East Glenn Highway communities (Stratton and Georgette 1984; McMillan and Cuccarese 1988; Holen et al. 2015). This limitation constrains findings about the customary and traditional use of nonsalmon fish in the areas considered in this analysis. However, findings for the East Glenn Highway communities combined are presented here as the best available information.

For the earlier 1982—1983 study year, ADF&G, Division of Subsistence surveyed the East Glenn Highway area as a single entity. That year, about half of the households surveyed reported freshwater fish harvests, especially Lake Trout, Rainbow Trout, Grayling and Burbot, with most of the fishing occurring locally (Stratton and Georgette 1984).

Mendeltna, Nelchina, and Tolsona's combined freshwater fish search and harvest locations in 2013 are listed in **Table 1**. As described previously, Burbot was the most used freshwater species for residents of Tolsona in 2013. That year residents of the East Glenn Highway communities fished for Burbot in three lakes north of Tolsona (Holen et al. 2015; **Figure 2**). East Glenn Highway residents fished for Rainbow Trout in small lakes close to Mendeltna and Tolsona, as well as in the Anchorage area (Holen et al. 2015, **Figure 3**). Arctic Grayling, Lake Trout, and whitefish were fished from creeks and lakes in the East Glenn Highway Area (Holen et al. 2015).

All bodies of water listed in **Table 1** are located in the Copper River drainage upstream from Haley Creek with the exception of Lake Louise and ponds in the Anchorage area. While these data show that residents of the East Glenn Highway area fished for freshwater fish in the Copper River drainage upstream from Haley Creek, they do not show whether these fishers included residents of Tolsona specifically. Of note, none of the named search locations are within or adjacent to Wrangell-St. Elias National Park and Preserve, the Gulkana National Wild and Scenic River, or non-navigable waters associated with BLM general domain lands.

Table 1. East Glenn Highway residents' freshwater fish search and harvest areas in 2013 (Holen et al. 2015).

Species	Search and Harvest Area
Burbot	Tolsona Lake, Moose Lake, and Crosswind Lake
Rainbow Trout	Buffalo, Tex Smith, Tolsona, and Crosswind lakes, an unnamed lake to the east of Lake Louise Road, Tolsona Creek and several ponds in the Anchorage area
Arctic Grayling	Mendeltna Creek, Tolsona Lake, Lake Louise, Tolsona Creek, and Crosswind and Kaina lakes
Lake Trout	High, Kaina, First Hill, and Crosswind lakes, Lake Louise, and an unnamed lake to the east of Tyone Creek and to the northwest of Susitna Lake
Dolly Varden	Klutina River near Klutina Lake
Whitefish	First Hill Lake

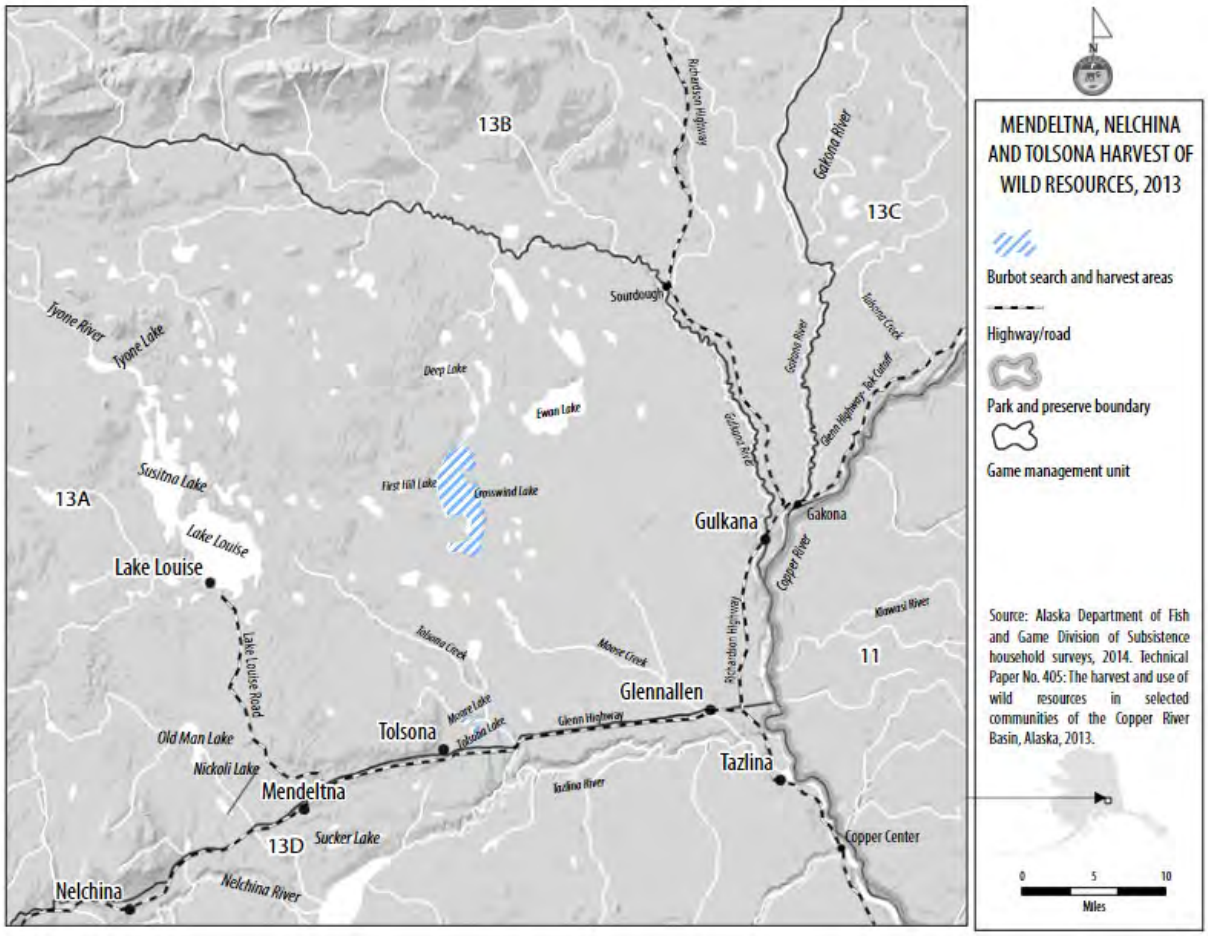


Figure 1. Map showing East Glenn Highway residents' search and harvest areas for Burbot in 2013 (Holen et al. 2015).

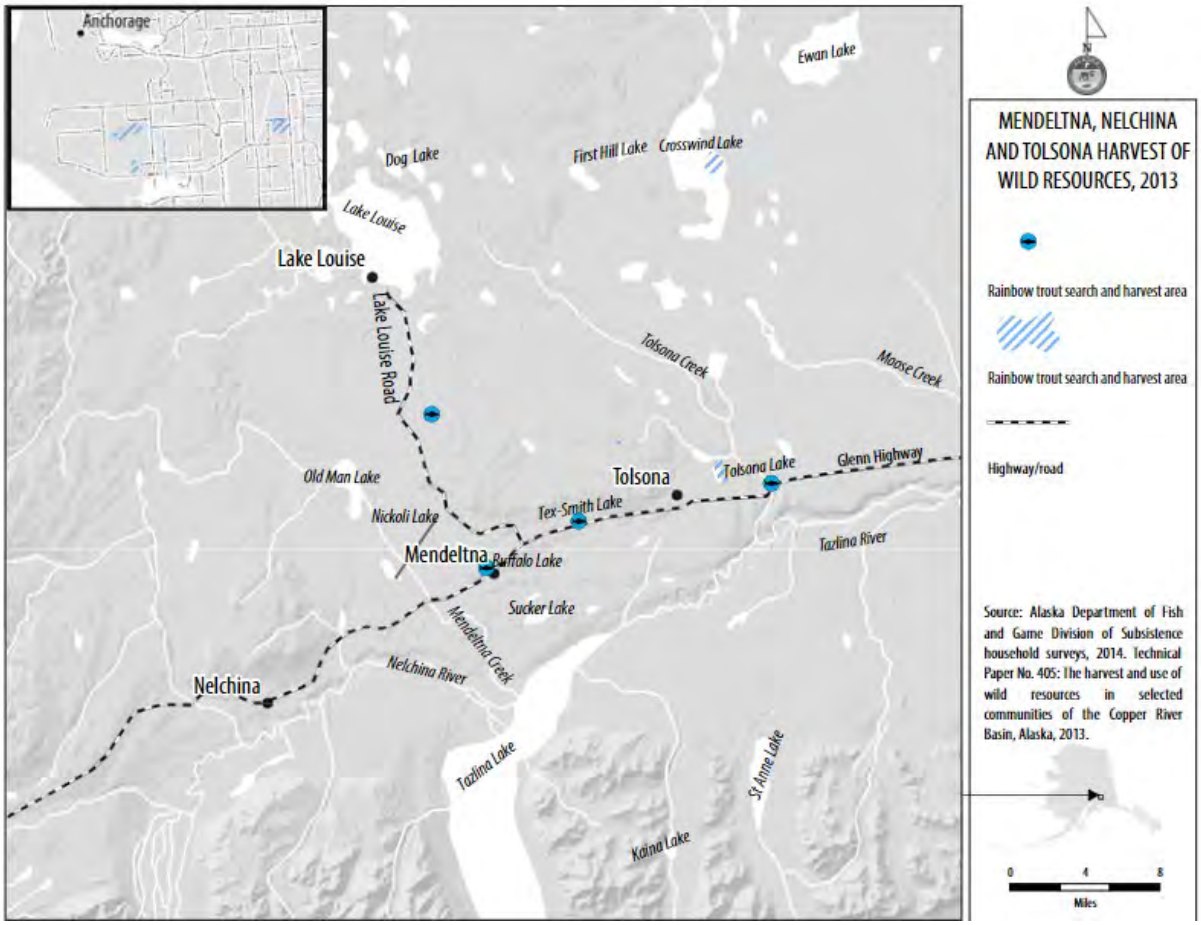


Figure 2. Map showing East Glenn Highway residents' search and harvest areas for Rainbow Trout in 2013 (Holen et al. 2015).

As part of their proposal, Tolsona Community Corporation submitted written testimony that was collected from residents of Tolsona, although it is unclear whether the individuals listed are current or former residents of Tolsona. With respect to fishing, the testimony focused on the Copper River in the vicinity of O'Brien Creek, with no specific accounts of harvesting freshwater fish or fishing at other locations. See **Appendix 1** in FP25-03a.

Information on handling, preparing, preserving, and storing of freshwater fish by residents of Tolsona is not readily available. Similarly, no information is available regarding handing down of knowledge and values related to freshwater fishing.

Fishing under Current Opportunities open to Tolsona Residents

Currently, residents of Tolsona can fish for freshwater fish in the Copper River drainage upstream from Haley Creek under State sport fishing and subsistence regulations. ADF&G, Sport Fish Division conducts an annual mail survey to estimate total harvest from sport fishing for areas, including the upper Copper River drainage. However, the results are not presented by community of residence, so it is impossible to use this data to identify any harvest specifically conducted by residents of Tolsona.

Data on any fishing of freshwater fish in the Copper River drainage upstream from Haley Creek under State subsistence opportunity was requested, but none was available (Mulligan, pers. comm. 2024).

Other Alternatives Considered

One alternative considered was to modify the customary and traditional use determination area to clarify that the Gulkana Wild and Scenic River is excluded. The modified area would read, "Copper River drainage upstream from Haley Creek and excluding the Gulkana Wild and Scenic River." The Gulkana River is a separate C&T area and continuing to include it in the Copper River drainage area was a regulatory oversight dating to 2003 (see Regulatory History). However, this oversight can also be corrected administratively, so this alternative was not considered further.

Effects of the Proposal

If this proposal is adopted, residents of Tolsona will be added to the customary and traditional use determinations for freshwater fish in the Copper River drainage upstream from Haley Creek. They would become federally qualified to harvest freshwater fish in the Copper River drainage upstream from Haley Creek under Federal subsistence regulations. A permit is required to harvest freshwater fish in the Prince William Sound Area under Federal regulations. If the proposal is rejected, residents of Tolsona could continue to fish in this area under State subsistence and sport fishing regulations.

OSM PRELIMINARY CONCLUSION

Neutral on Proposal FP25-03b.

Justification

OSM is seeking 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. While there is evidence of freshwater fish use by residents of Tolsona, the location of harvests and time-depth of this use is unknown. There are several points of evidence that lend support to this proposal, but which alone are insufficient. Tolsona is located within the Copper River drainage upstream from Haley Creek, the area in which the proponent has requested a customary and traditional use determination for freshwater fish. The Board has previously recognized Tolsona's customary and traditional uses of wildlife species in Units 11 and 13, and it is possible that residents of Tolsona harvest freshwater fish in tandem with subsistence activities in these areas.

There is a single survey year in which ADF&G, Division of Subsistence documented Tolsona's subsistence use as an individual community. This survey showed that surveyed households harvested six different species of freshwater fish in 2013, and a large percentage of surveyed Tolsona households used freshwater fish. While it is reasonable to assume that Tolsona residents harvested these fish close to home, the subsistence survey did not provide this information, as Tolsona's search area for freshwater fish was not separated from that of the neighboring communities of Mendeltna and Nelchina.

In earlier subsistence surveys, Tolsona was studied as part of a combined East Glenn Highway area and use patterns specific to Tolsona cannot be identified from the data. No information is available on Tolsona residents' fishing under State sport or subsistence opportunities. While testimony by Tolsona residents on their subsistence harvests was provided as part of the proposal (see FP25-03a), most of this testimony focuses on use of salmon. While Tolsona may have a pattern of customary and traditional use of freshwater fish in the area under consideration, data on areas fished and the time-depth of this fishing are currently lacking. OSM seeks the input of the Council, public, tribes, and ANCSA corporations to further inform consideration of this proposal.

LITERATURE CITED

ADF&G. 2024. Community Subsistence Information System, ADF&G, Div. of Subsistence. https://www.adfg.alaska.gov/sb/CSIS/. Retrieved: June 10, 2024.

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

McMillan, P. and S. Cuccarese. 1988. Alaska over-the-horizon backscatter radar system: Characteristics of contemporary subsistence use patterns in the Copper River basin and upper Tanana area. Vol. I: Synthesis. Arctic Environmental Information and Data Center. Anchorage, AK.

Mulligan, B. 2024. Deputy Commissioner. Personal communication: email. ADF&G. Anchorage, AK.

Stratton, L. and S. Georgette. 1984. Use of fish and game by communities in the Copper River basin, Alaska: A report on a 1983 household survey. ADF&G, Div. of Subsistence. Tech. Paper No. 107. Anchorage, AK.

WRITTEN PUBLIC COMMENT

Subject: Proposal

Federal Subsistence Management Program/Federal Subsistence Board

Re: Proposal FP25-03 Tolsona C&T Freshwater Fish and Salmon in Copper River

To Whom It May Concern:

This letter is in reference to the Tolsona Community's proposal to acquire subsistence rights in the Wrangell St. Elias National Park.

My name is Kirk Wilson. I have been living in the Tolsona community for 43 years. I live on Tolsona Lake right next to the lodge. I have talked with my neighbors and they have not heard anything about this proposal either. The proposer does not represent me in this matter. The Tolsona Community recognizes a land or business owner as a full time resident in order to serve on the local board or directors. This is in direct conflict with the State of Alaska and the United States Federal Government's qualifications as a resident for subsistence rights.

The federal government doesn't recognize a person that is not a permanent resident for use of federal land. I would recommend that you require individuals of Tolsona community to provide proof of their customary and traditional use patterns of the federal land in question. With caribou and moose populations in decline, this is not the time to be adding new user groups. The true subsistence hunter that uses these Federal lands are going through a hard enough time harvesting as it is now.

The people and their families that are listed in the proposal that claim they have historically used federal lands have not lived in the Tolsona community for more than 20 years. Many others have very short lived or questionable residency in the Tolsona community. In addition to residency questionability, the testimony refers to many historical users fishing in O'Brien Creek. This area can be fished by state subsistence permit and would seem to give this group ample opportunity without being federally qualified. It looks as if this group would like to be federally qualified more for hunting than fishing. I do not believe there is 1 person in this group of Ahtna decent.

It would be a shame for the Wrangell St. Elias National Park to approve a proposal where the lion's share of the community have never used these

federal lands for subsistence purposes.

Respectfully,

Kirk Wilson

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 XX.
OSM Preliminary Conclusion	**Support** Proposal WP25-01 **with modification** to specify which communities are eligible to hunt caribou via the §804 user prioritization analysis and rescind DALs, moving existing delegated authority to unit-specific regulations.
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	

DRAFT 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) Glenallen 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)	***May be announced between** Aug. 1–Sep. 30*
The Glennallen Field Office Manager, in consultation with the Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons, and set sex restrictions and harvest limits.	***May be announced between** Oct. 21–Mar. 31*

Federal public lands 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.

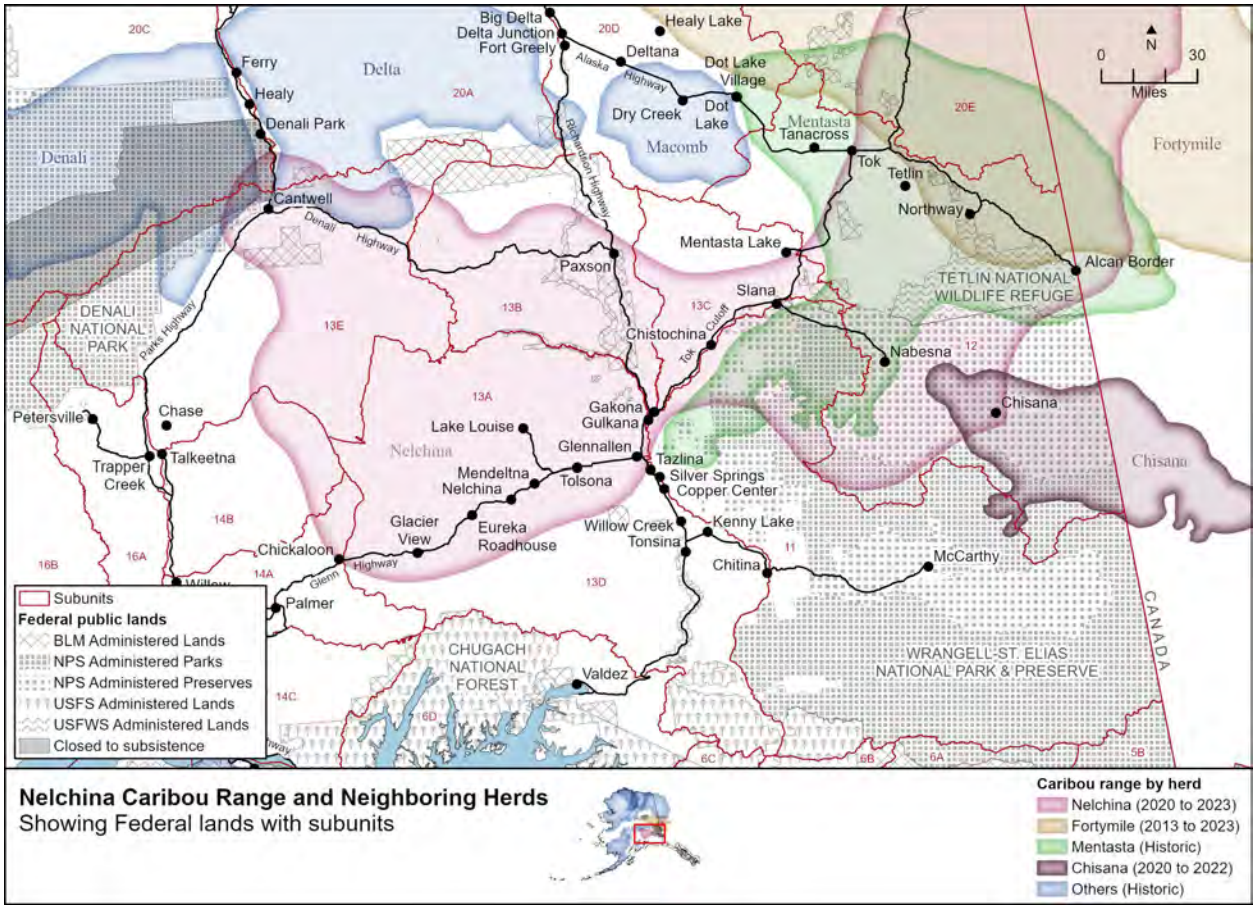


Figure 1. Federal public lands in Units 11, 12, and 13.

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 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.

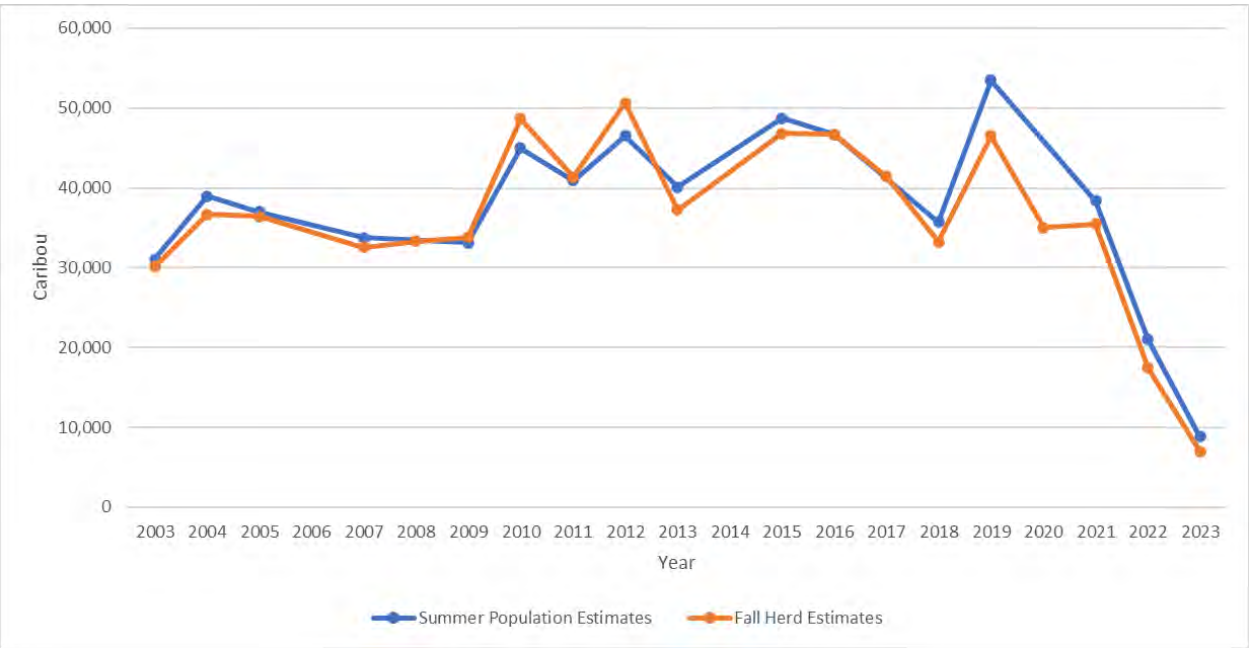


Figure 2. Summer and fall population estimates for the NCH (ADF&G 2024a). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

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

Regulatory Year	Harvest Quota	State Harvest	Federal Harvest (FC1302)	Total Unit 13 Harvest
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	Har-vested Male	Har-vested Female	Harvested Unknown Sex	Total Har-vested
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 dependent 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, rather than for larger areas or Game Management Units.

[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	**Gakona**	13B/C	181
12	**Denali Park Village**	20C	*
13	**Tanacross**	12	141
14	**Tetlin**	12	140
15	**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, mileposts 79—110)**	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 that results should be extrapolated to the smaller areas 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

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%

	Community	Unit	Percentage of Surveyed Households Using Caribou
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

	Community	Unit	Pounds of Caribou Harvested Per Person
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%

	Community	Unit	Percentage of Total Harvest Composed of Caribou
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%

Community	Unit	Percentage of Surveyed House-holds Receiving Caribou	Percentage of Surveyed House-holds Giving Caribou
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 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 heaving 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%

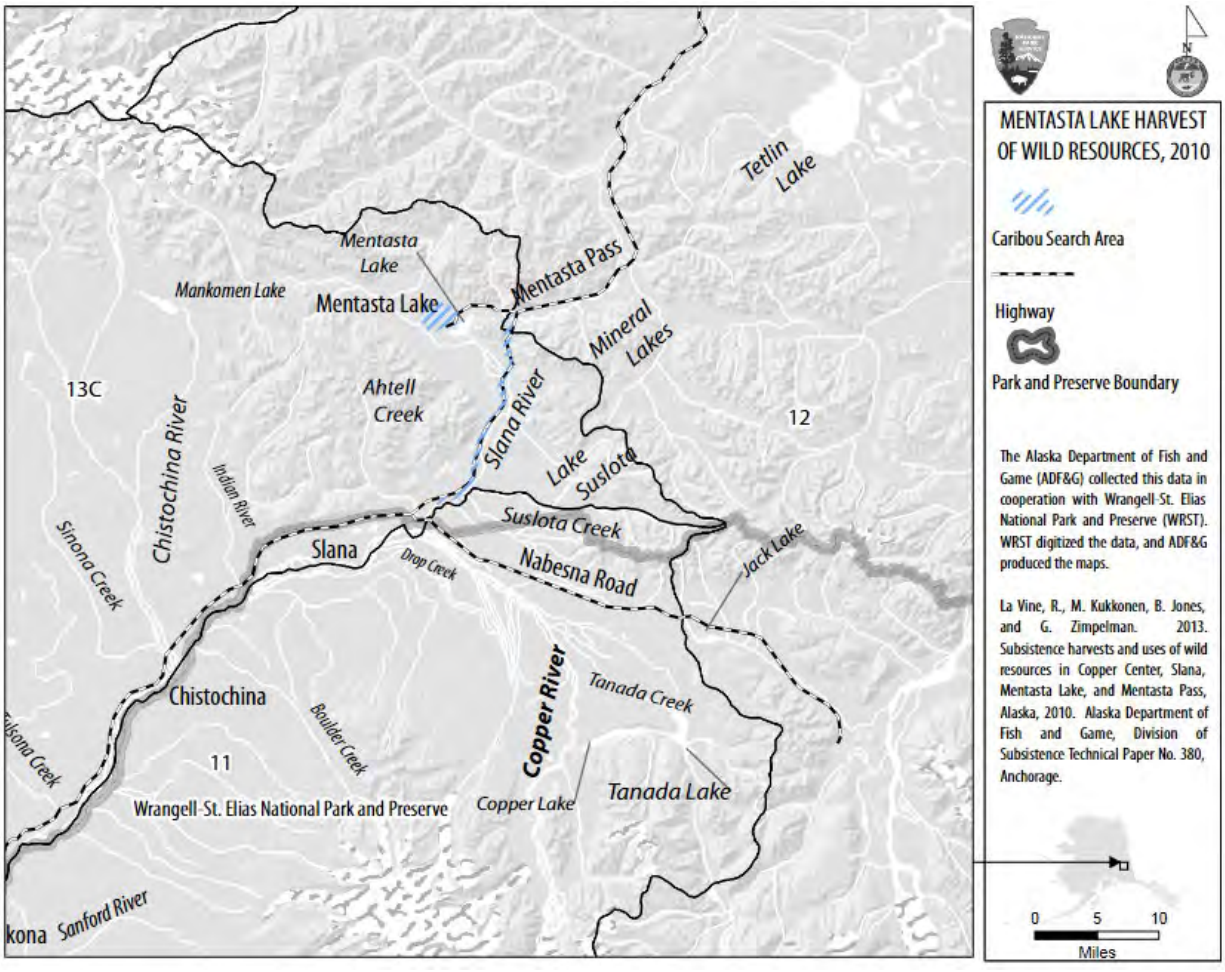


Figure 3. Mentasta Lake's documented caribou search areas, 2010 (La Vine et al. 2013).

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.

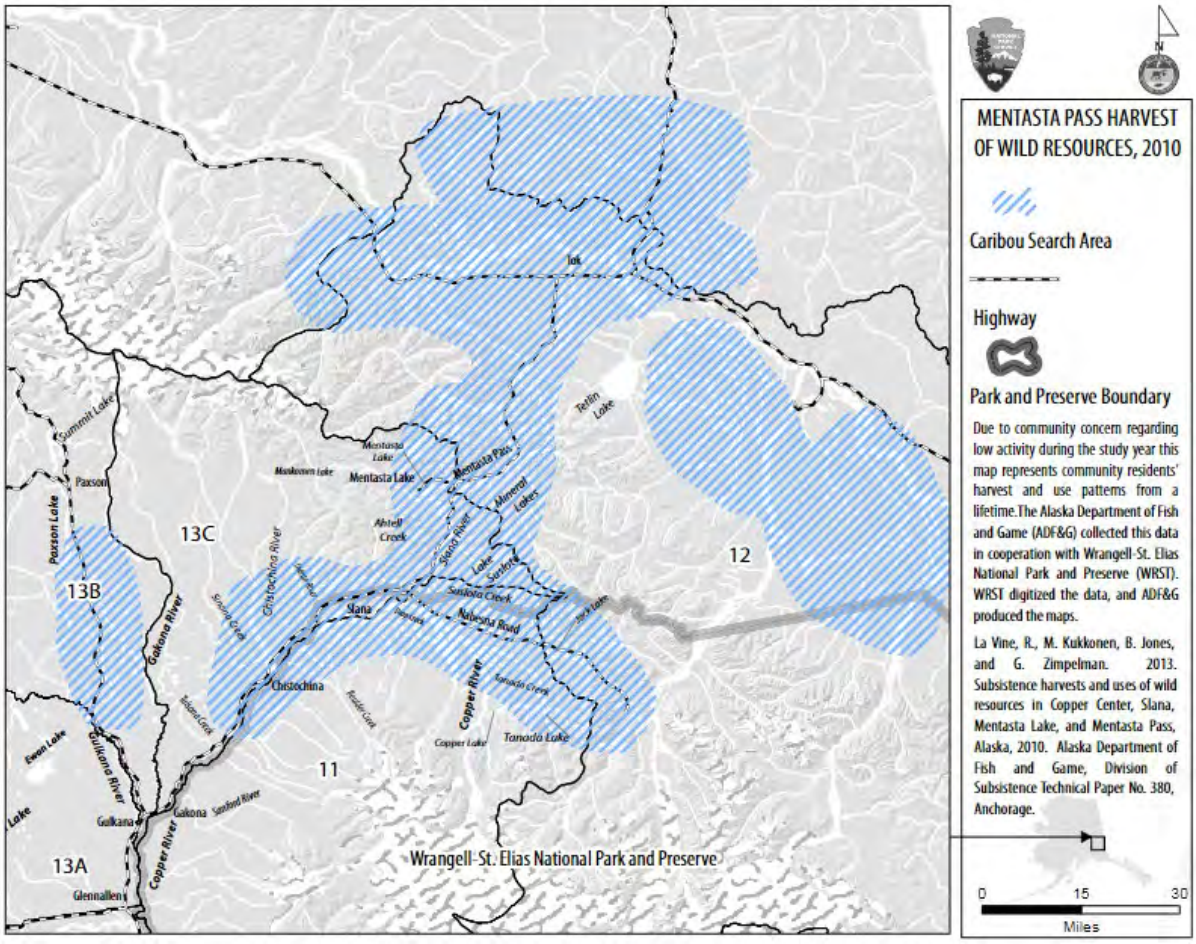


Figure 4. Mentasta Pass' documented search area for caribou. Although the map is labeled "2010," the Division of Subsistence report indicates that residents shared search areas from previous areas as well (La Vine et al. 2013). This likely increased the search areas mapped when compared to communities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

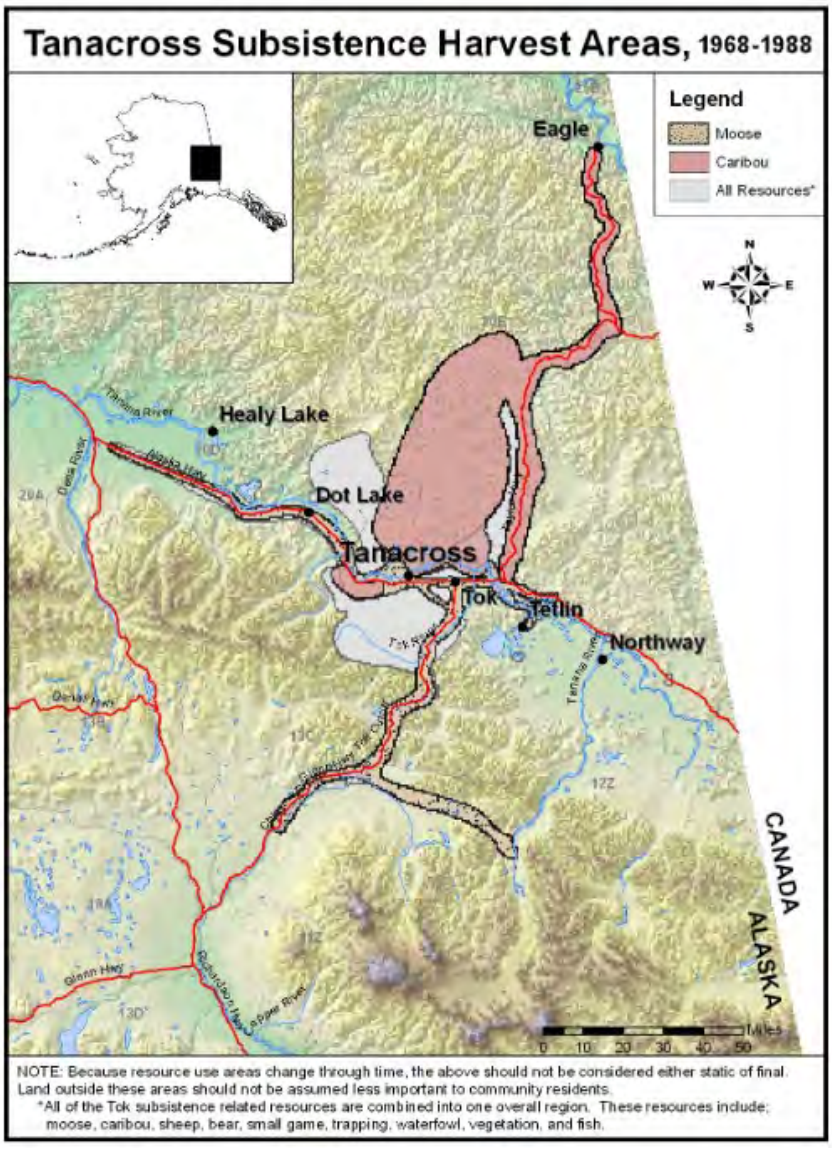


Figure 5. Tanacross' documented search area for caribou and other resources, 1968-1988 (Marcotte 1991, in Koskey 2007).

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%

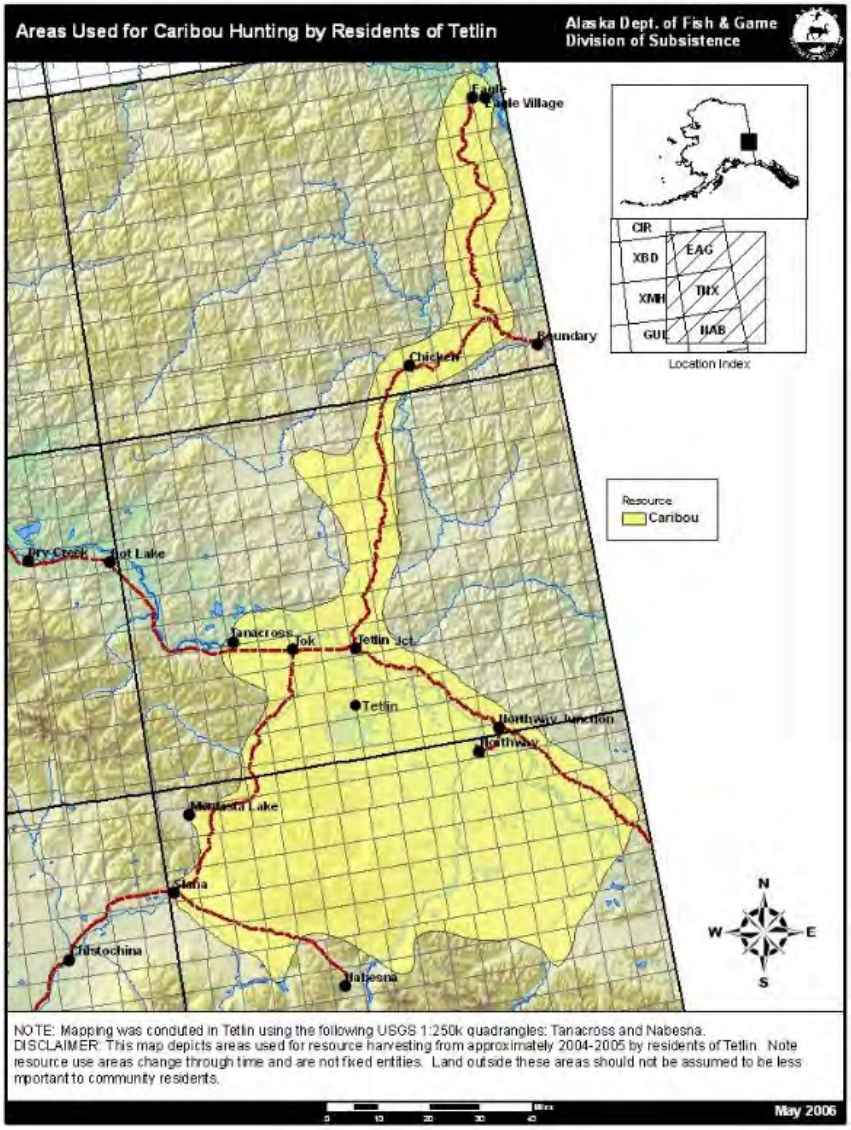


Figure 6. Tetlin's documented search area for caribou, 2004 (Koskey 2007).

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%

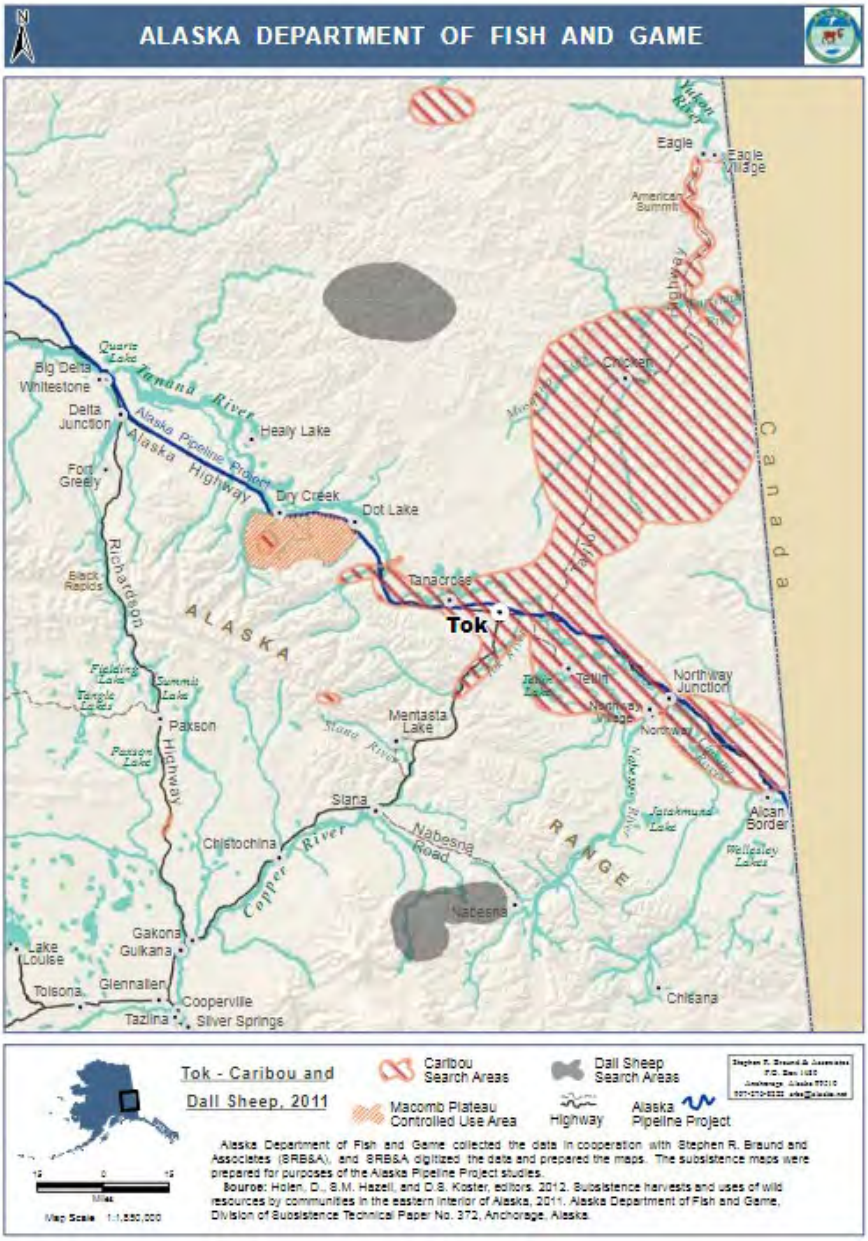


Figure 7. Tok's documented search area for caribou (and sheep), 2011 (Holen et al. 2012).

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%

	Resource	Percentage of Total Harvest
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 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

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

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**).

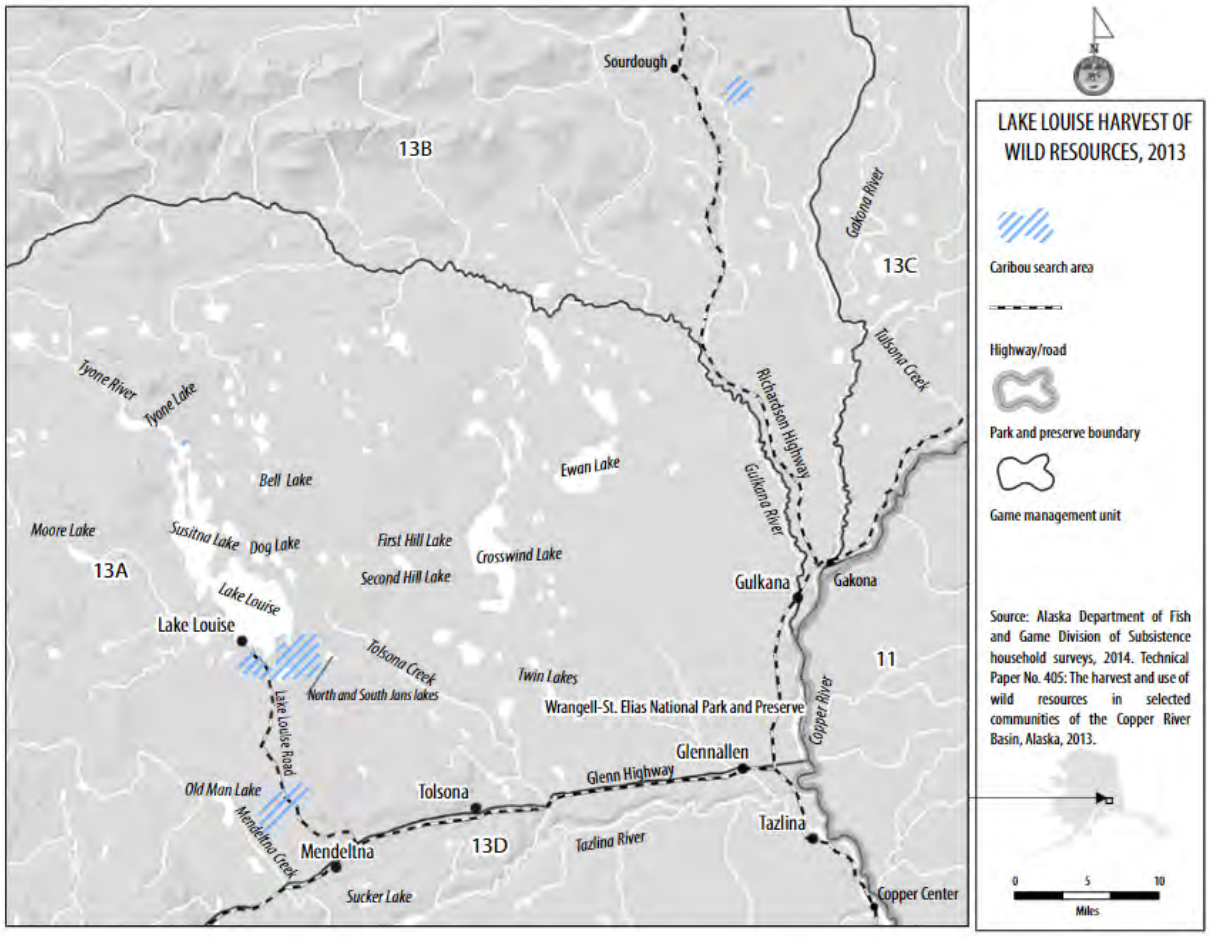


Figure 8. Lake Louise's documented search area for caribou, 2013 (Holen et al. 2015).

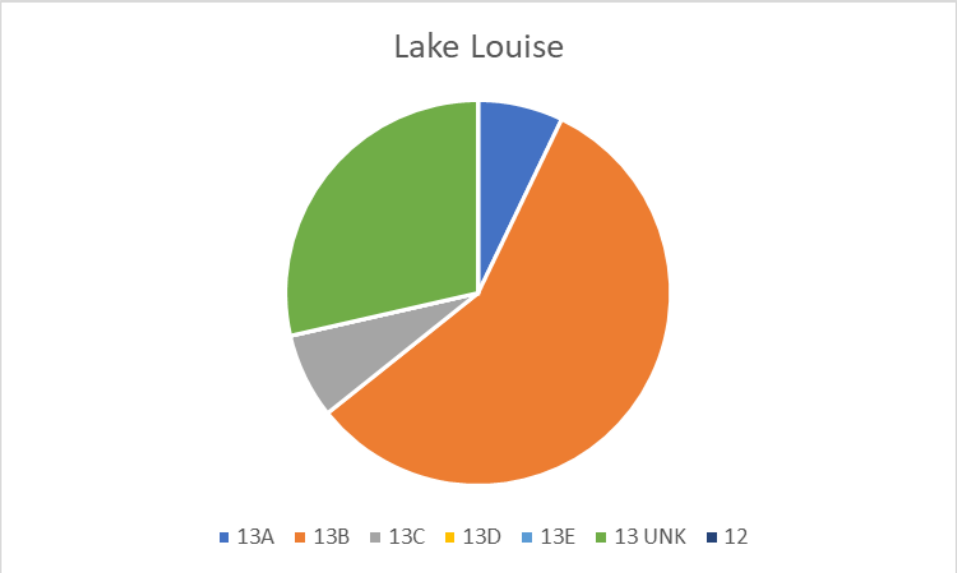


Figure 9. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Lake Louise's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-seven percent of Lake Louise's harvest took place in Unit 13B, 29% in an unknown subunit of Unit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

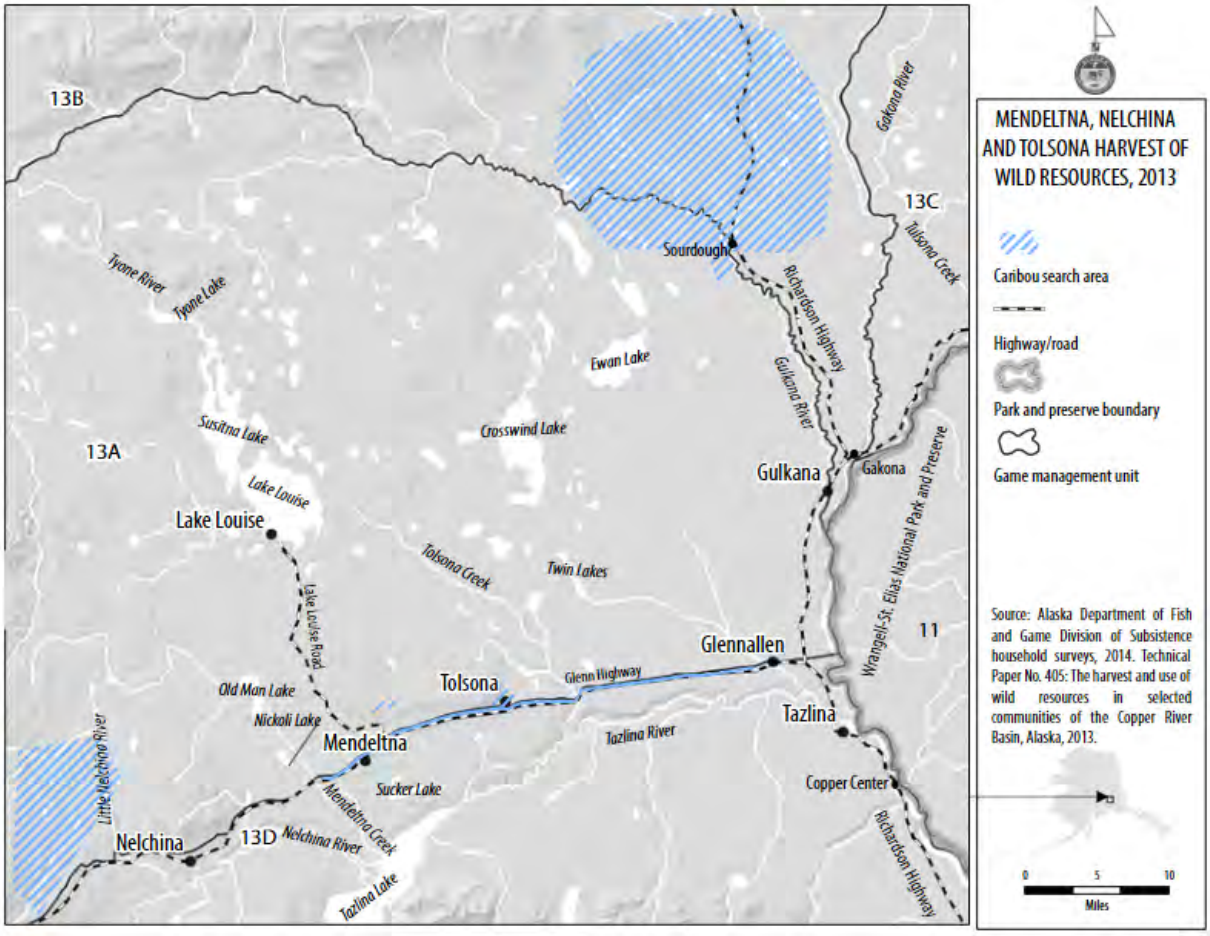


Figure 10. Documented search areas documented for residents of Mendeltna, Nelchina, and Tolsona for the 2013 study year (Holen et al. 2015).

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**).

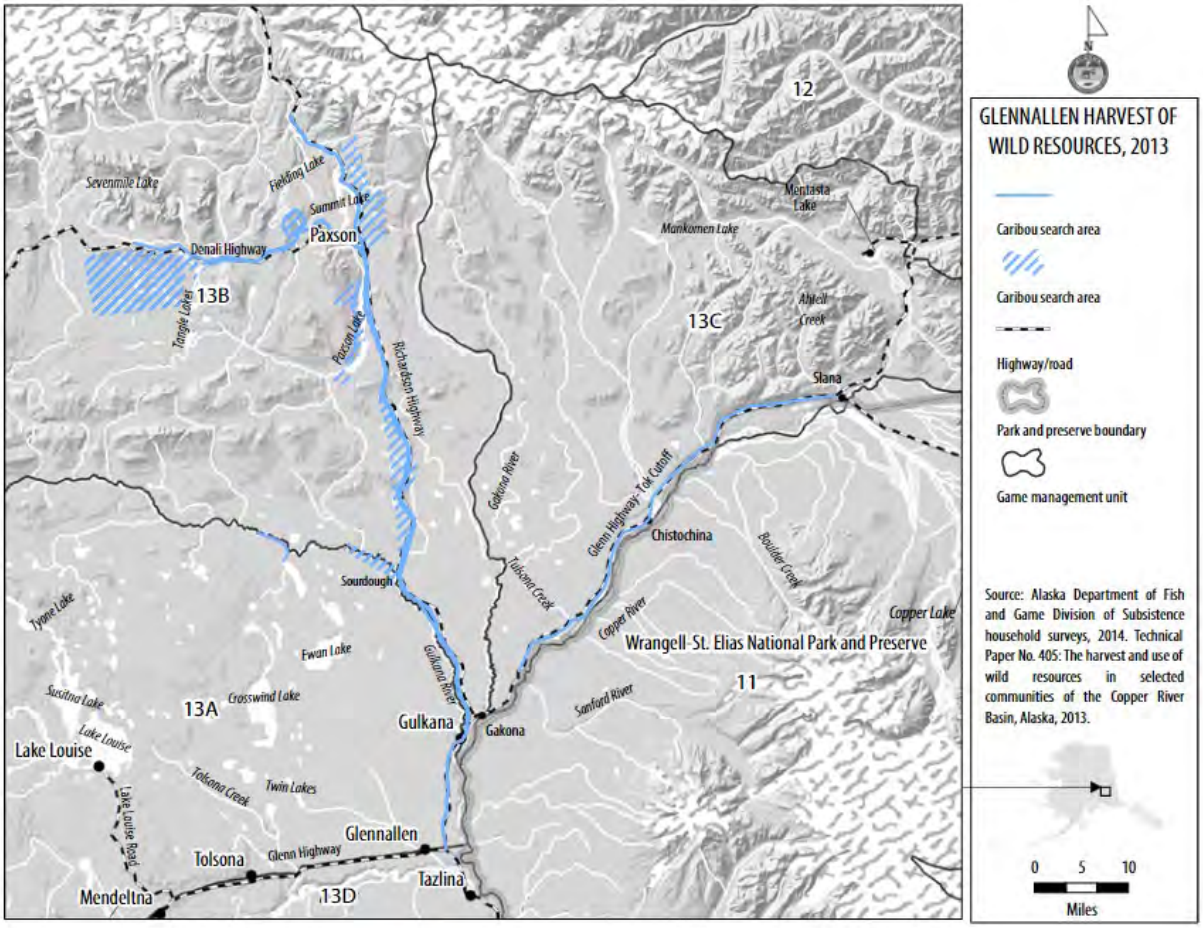


Figure 11. Glennallen's search area for caribou, 2013 (Holen et al. 2015).

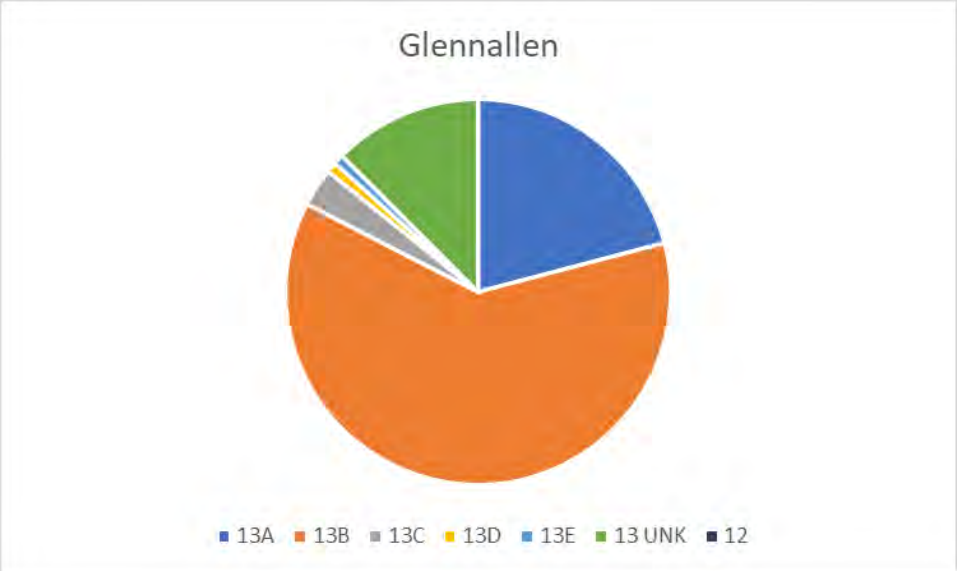


Figure 12. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Glennallen's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Sixty-two percent of Glennallen's harvest took place in Unit 13B, 21% in Unit 13A, 13% in an unknown 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%

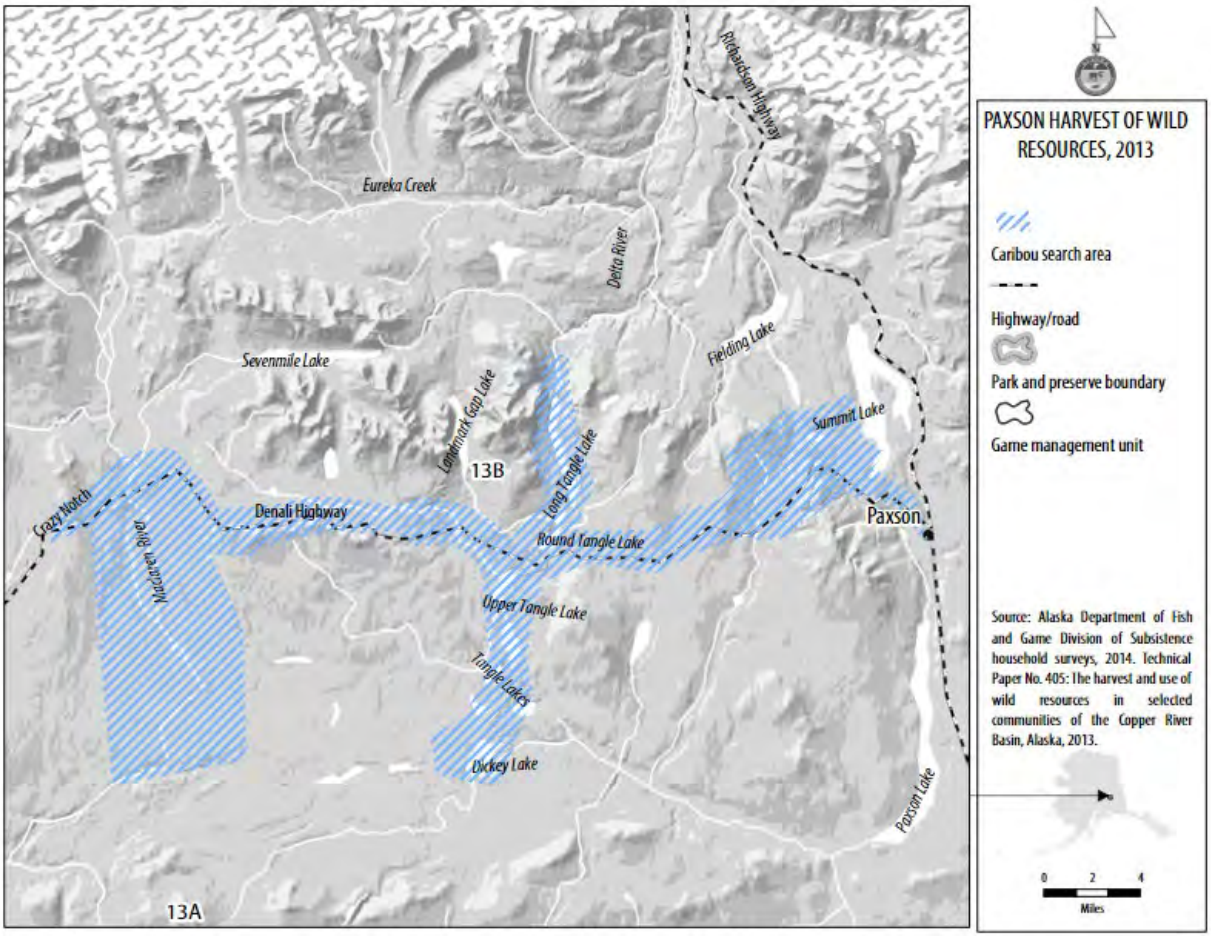


Figure 13. Paxson's documented search area for caribou, 2013 (Holen et al. 2015).

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).

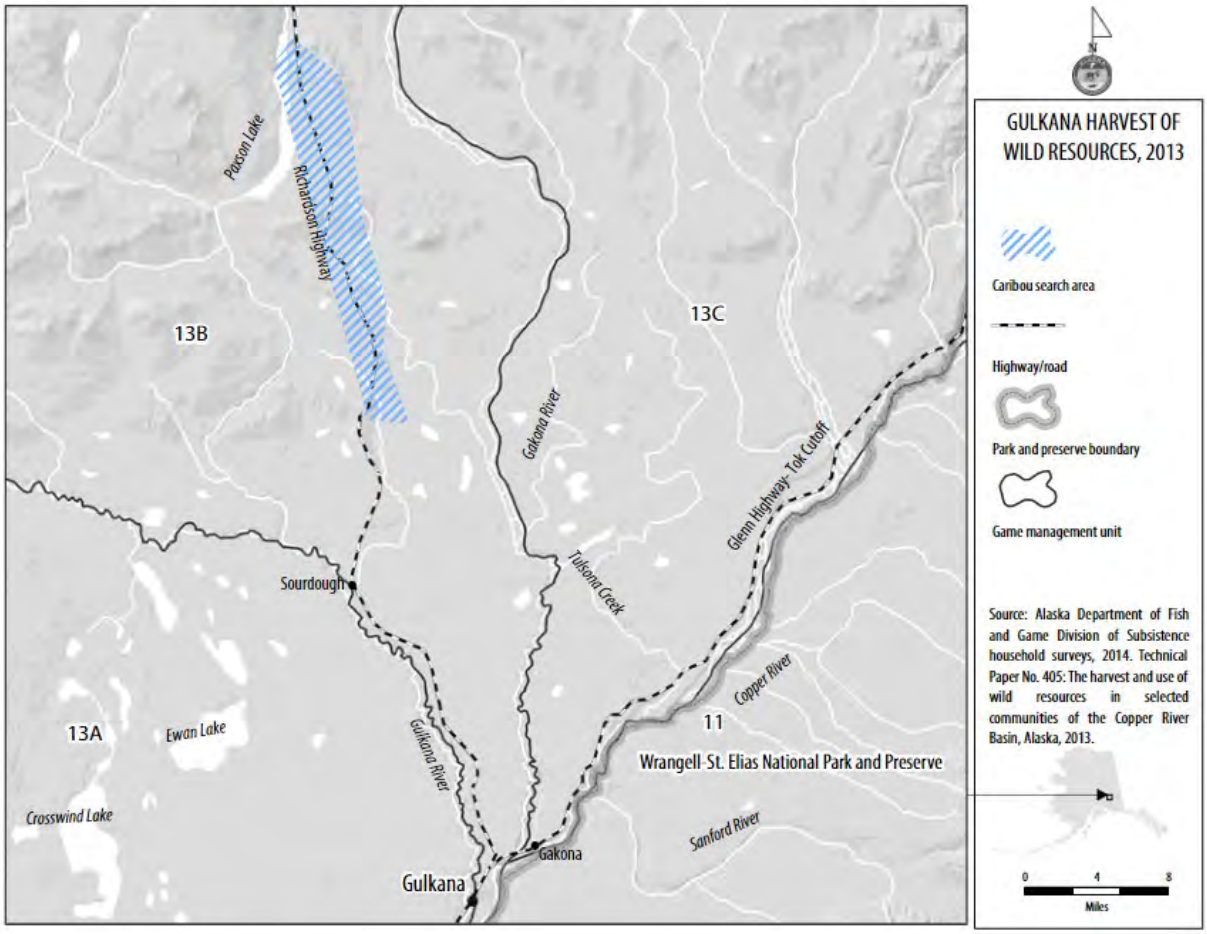


Figure 14. Gulkana's documented search area for caribou in 2013 (Holen et al. 2015).

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).

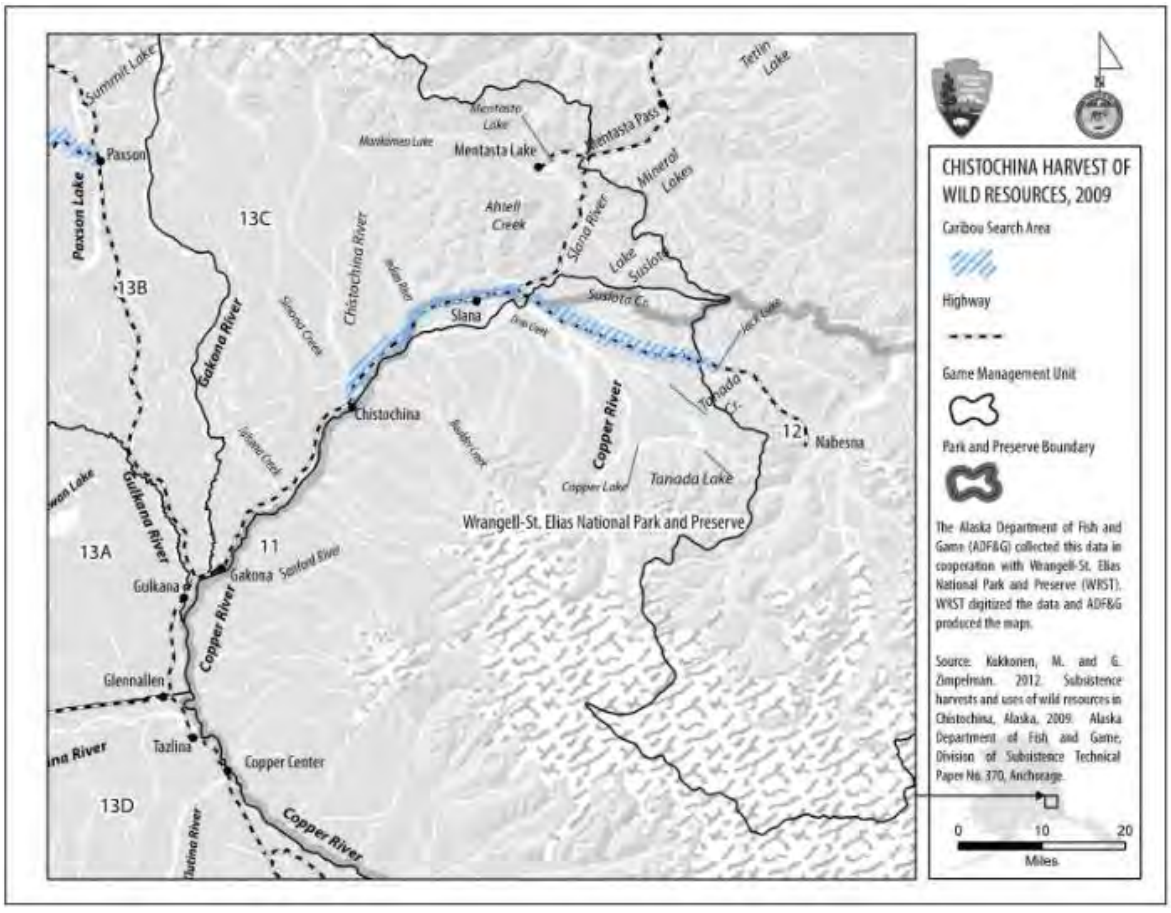


Figure 15. Chistochina's documented search area for caribou, 2009 (Kukkonen and Zimpelman 2012).

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**).

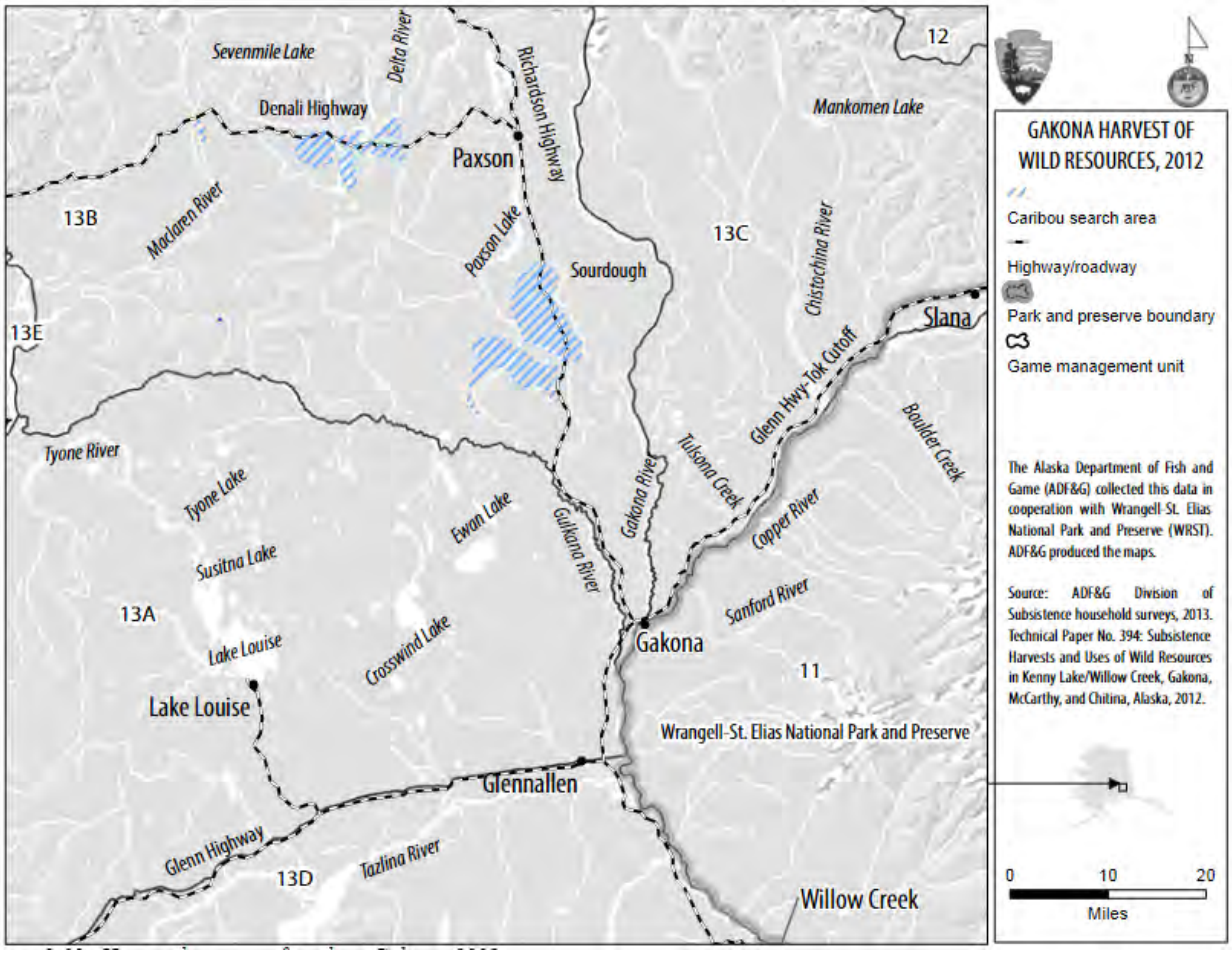


Figure 16: Gakona's documented search area for caribou, 2012 (La Vine and Zimpelman 2014).

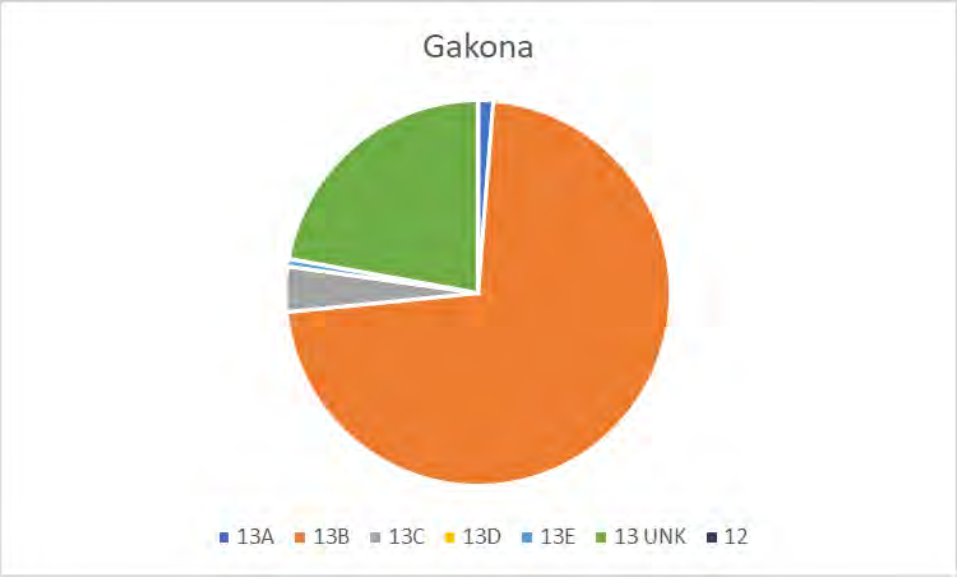


Figure 17. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Gakona's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-two percent of Gakona's harvest took place in Unit 13B, 22% in an unknown subunit of Unit 13, 4% in Unit 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%

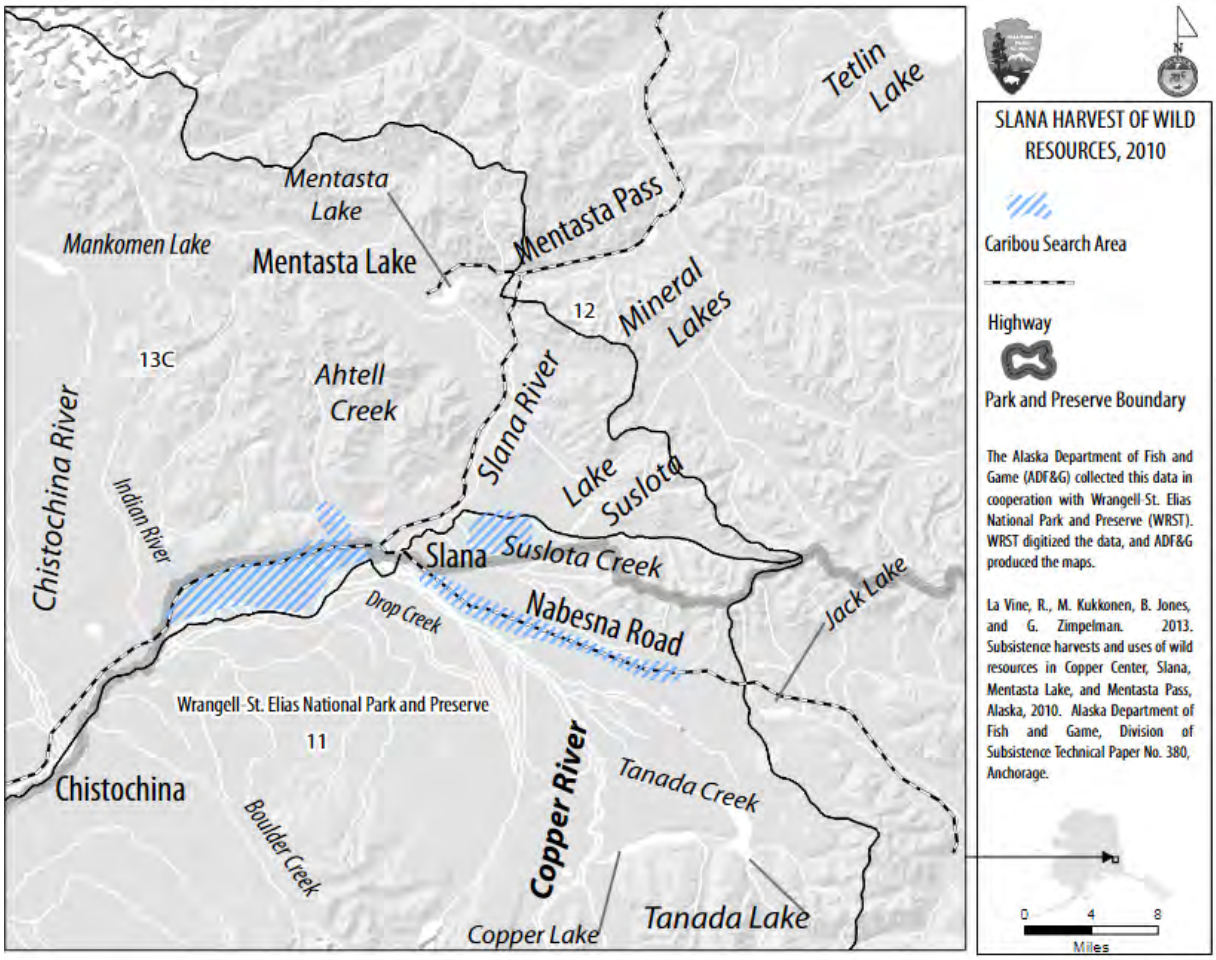


Figure 18. Slana/Nabesna Road's documented search area for caribou, 2010 (La Vine et al. 2013). Although the Figure heading indicates that the search areas represented are for "Slana," La Vine et al. (2013) indicate that this also includes Nabesna and Nabesna Rd.

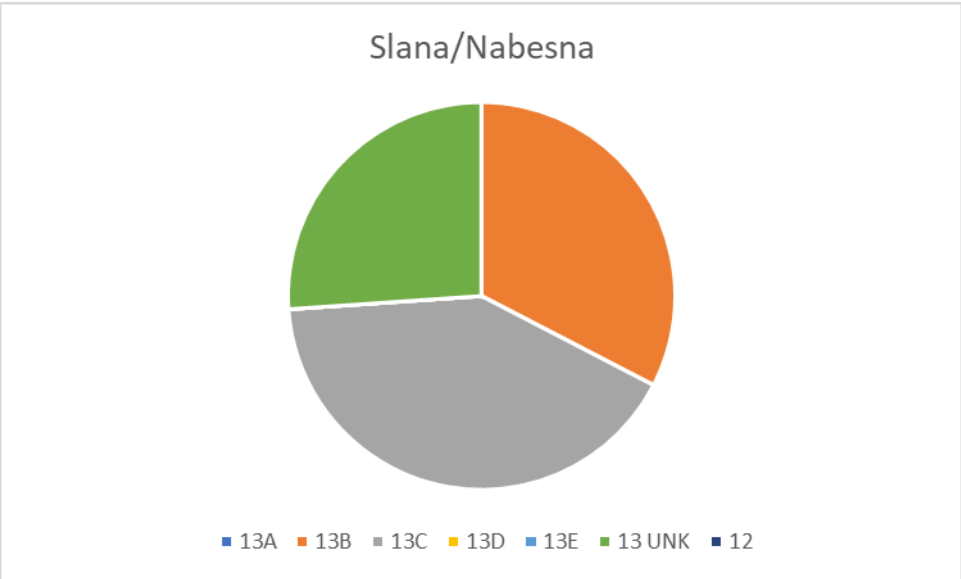


Figure 19. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Slana/Nabesna's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Forty-one percent of Slana/Nabesna's harvest took place in Unit 13C, 32% in Unit 13B, and the remainder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

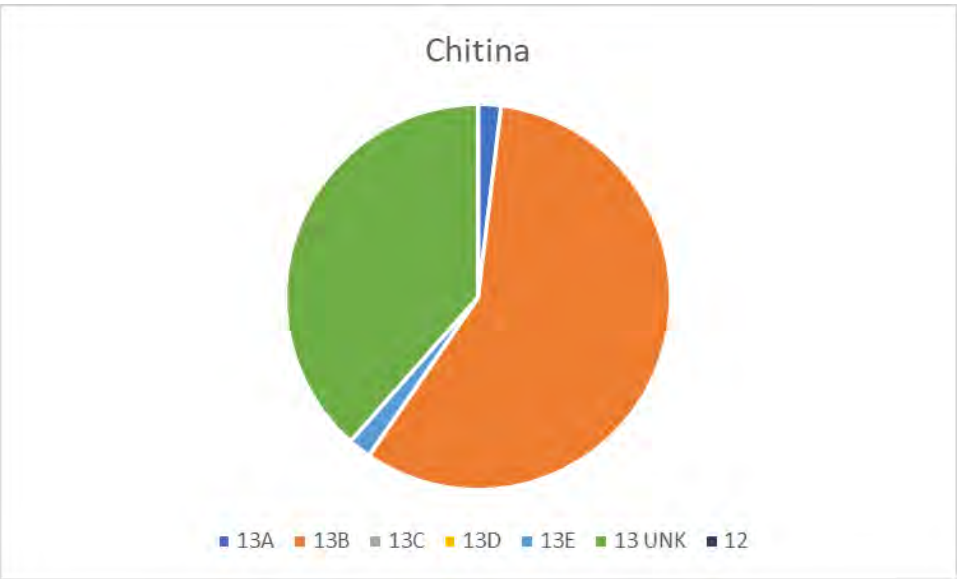


Figure 20. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Chitina's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-eight percent of Chitina's harvest took place in Unit 13B, 38% in an unknown subunit of Unit 13, and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

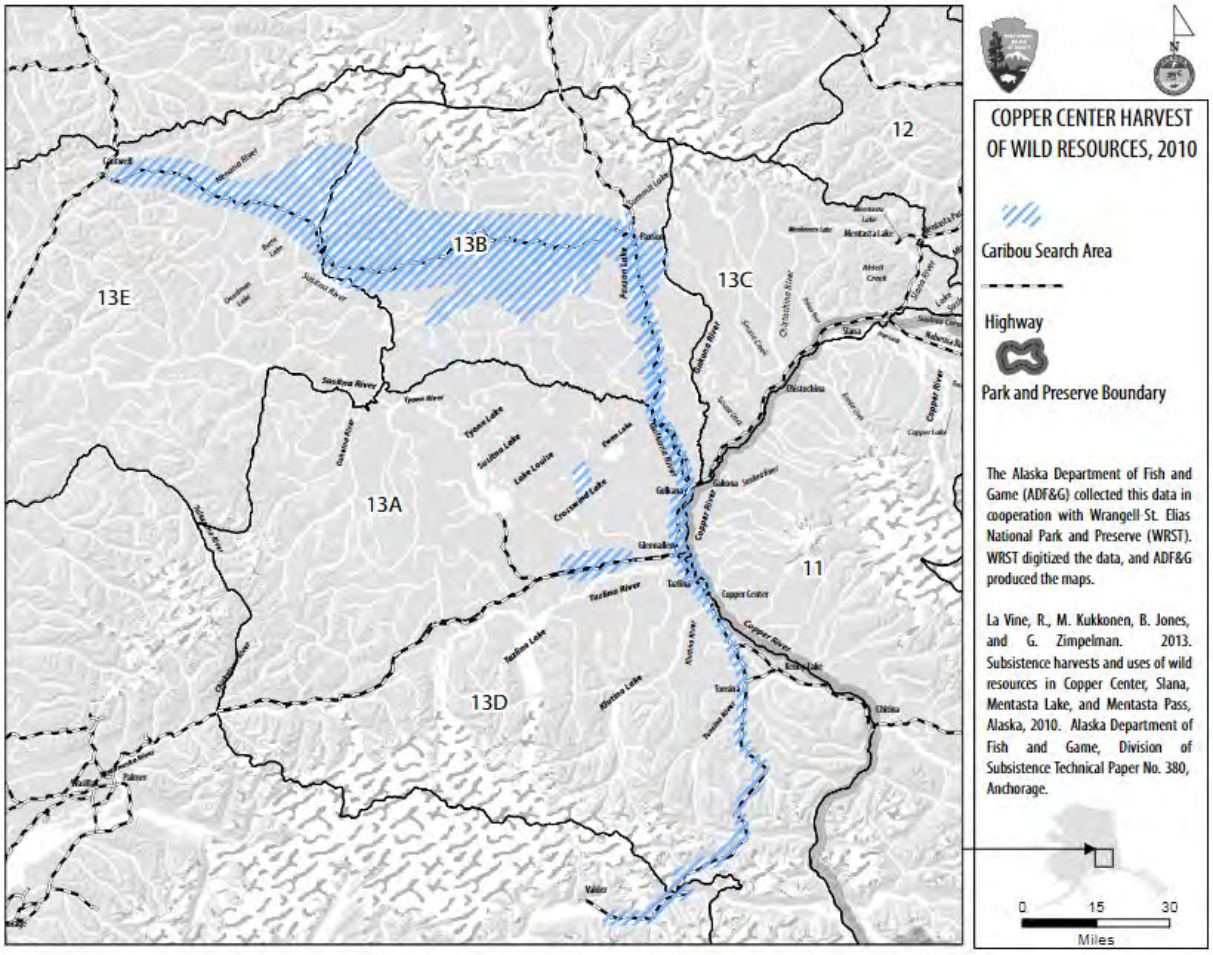


Figure 21. Copper Center/Silver Spring's documented caribou search areas, 2010 (La Vine et al. 2013).

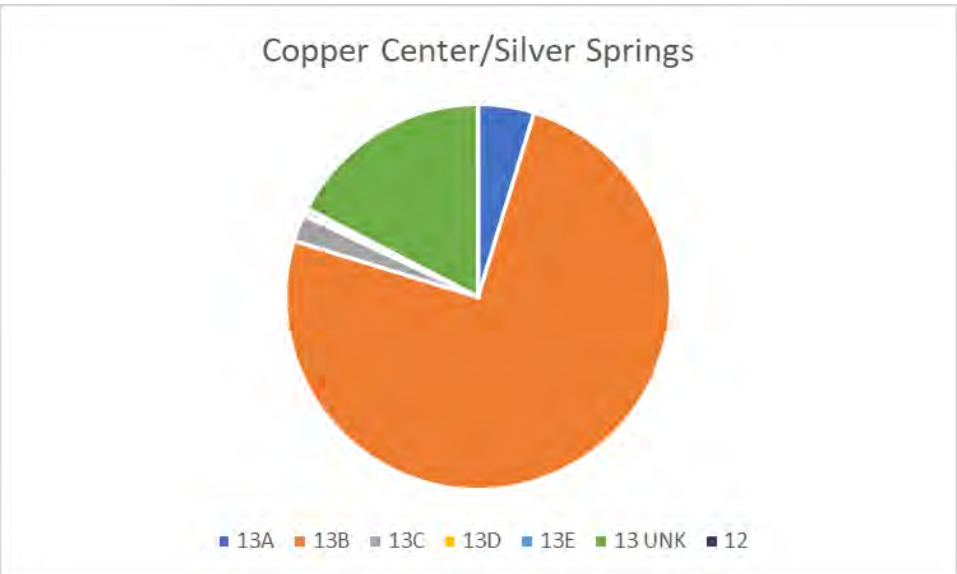


Figure 22. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Copper Center/Silver Spring's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-five percent of harvest took place in Unit 13B, 17% in an unknown subunit of Unit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

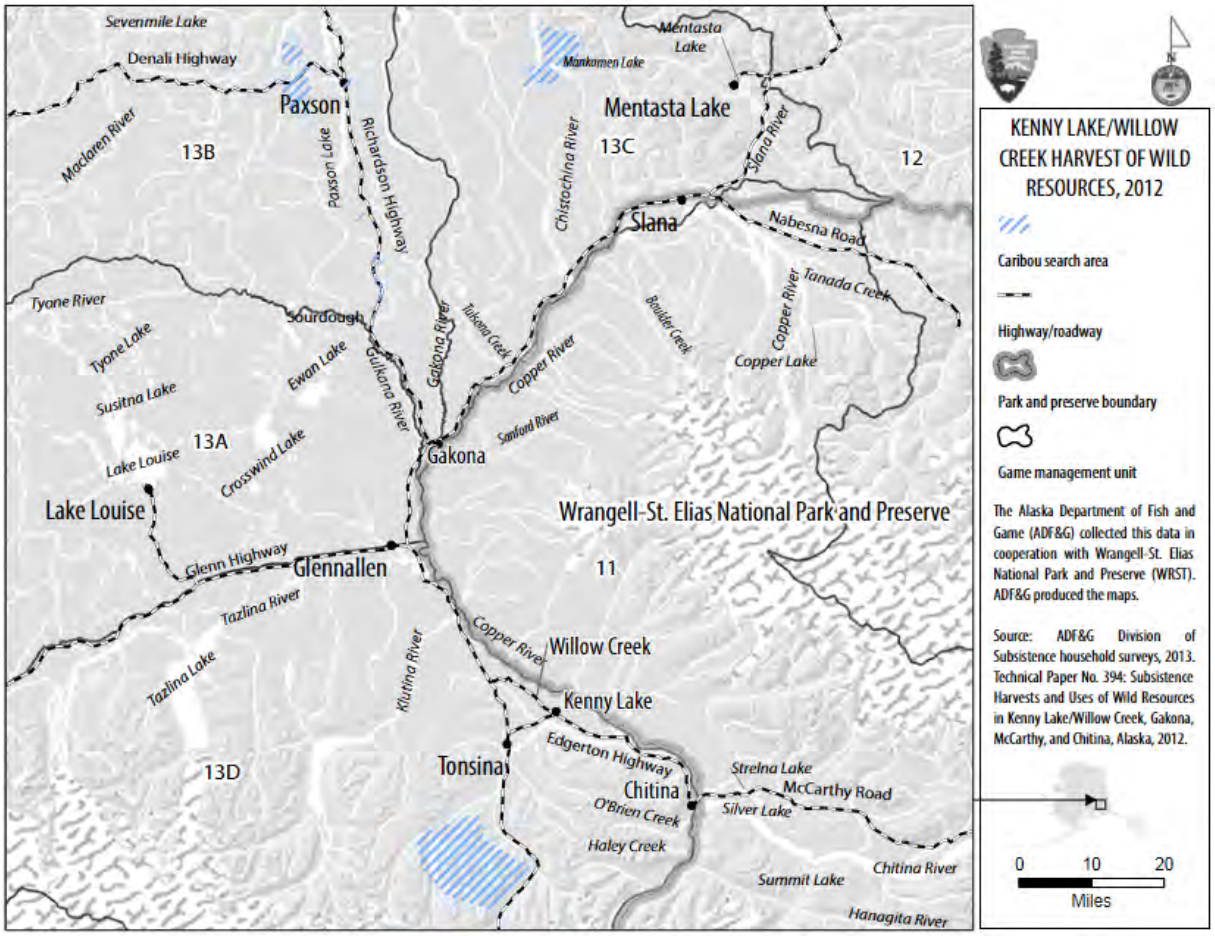


Figure 23. Kenny Lake's documented search area for caribou, 2012 (La Vine and Zimpelman 2014).

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%

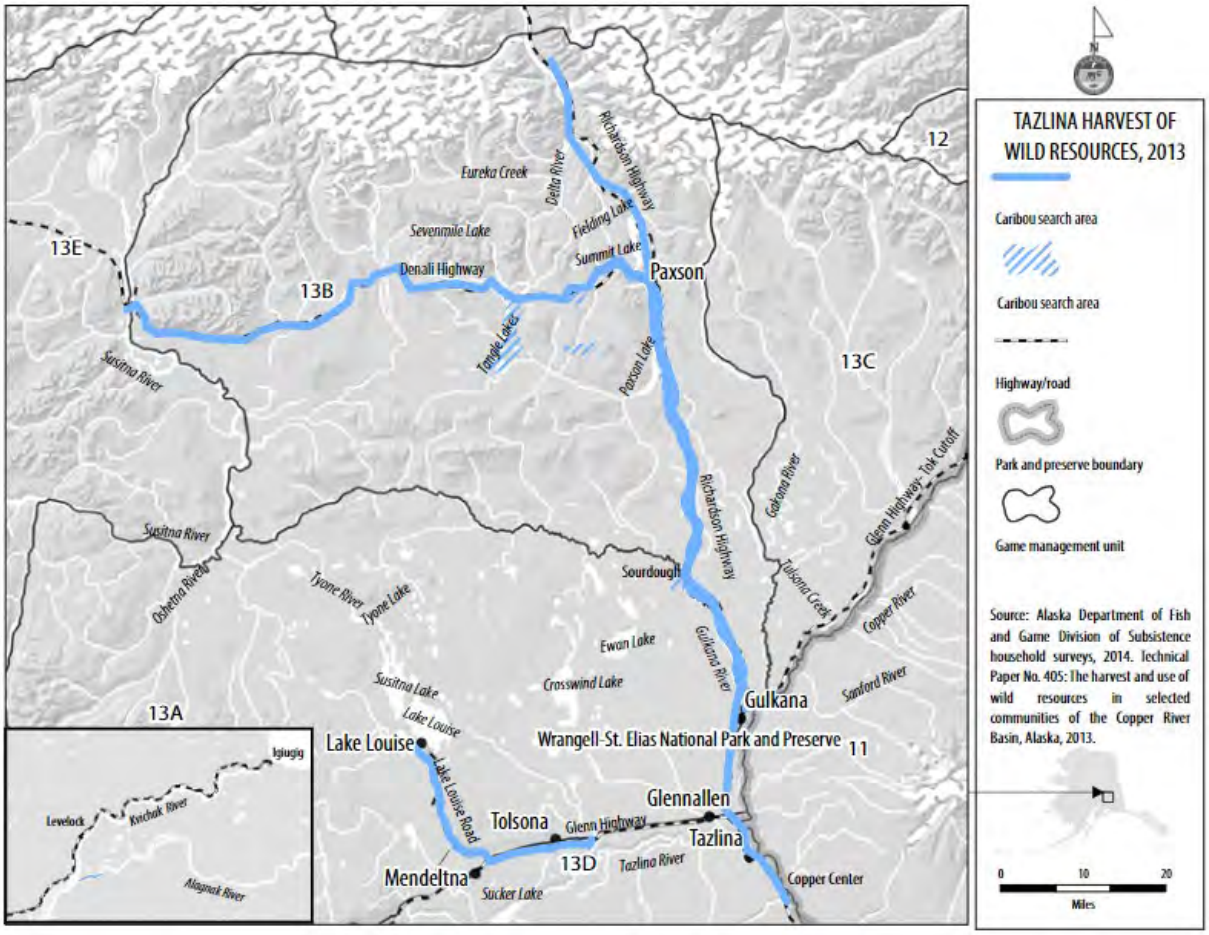


Figure 24. Tazlina's documented search area for caribou, 2013 (Holen et al. 2015).

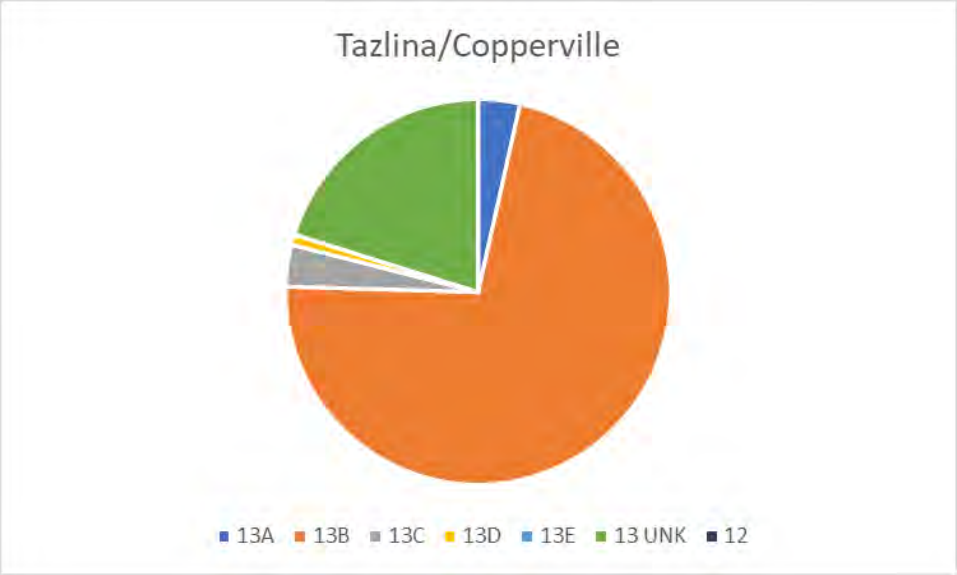


Figure 25. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Tazlina/Copperville's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit.

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%

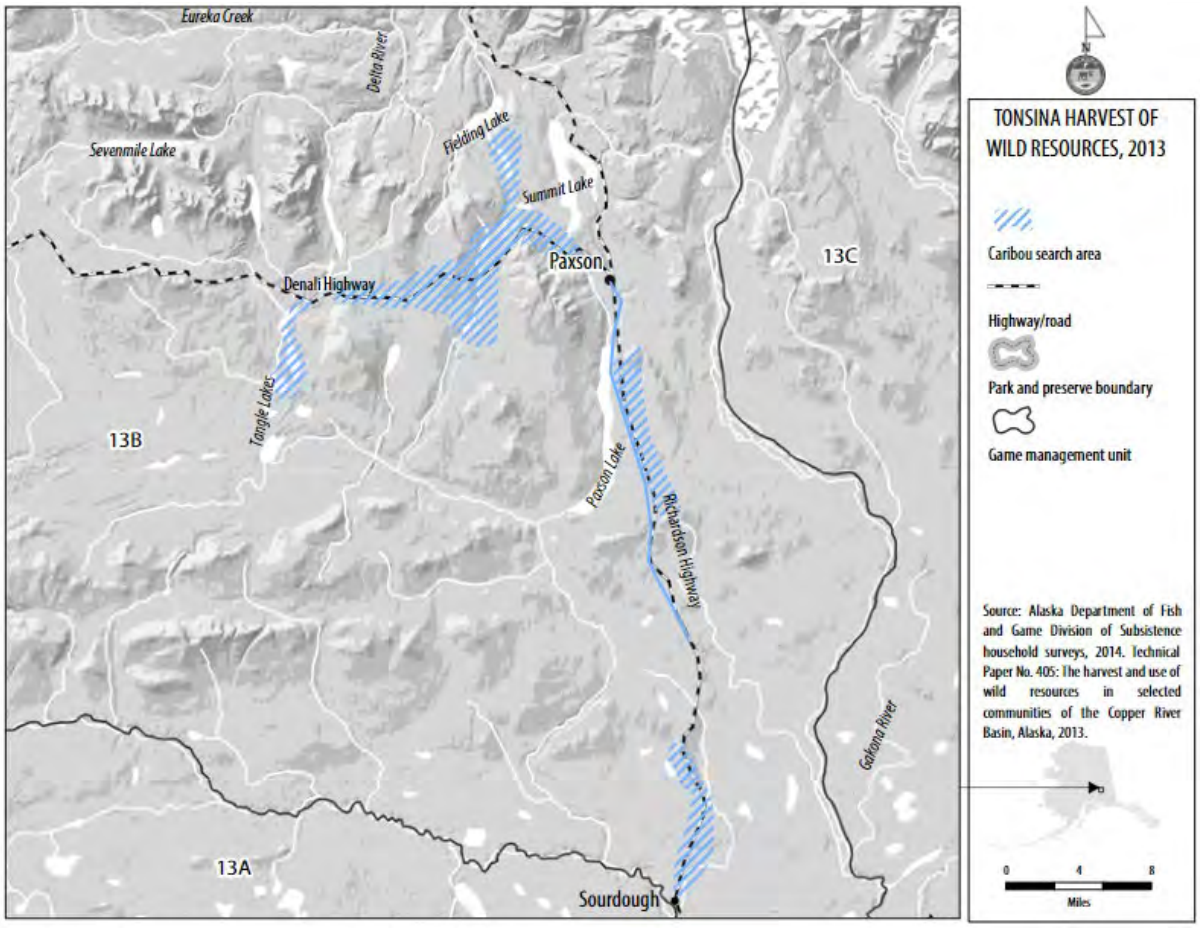


Figure 26. Tonsina's documented search areas for caribou, 2013 (Holen et al. 2015).

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%

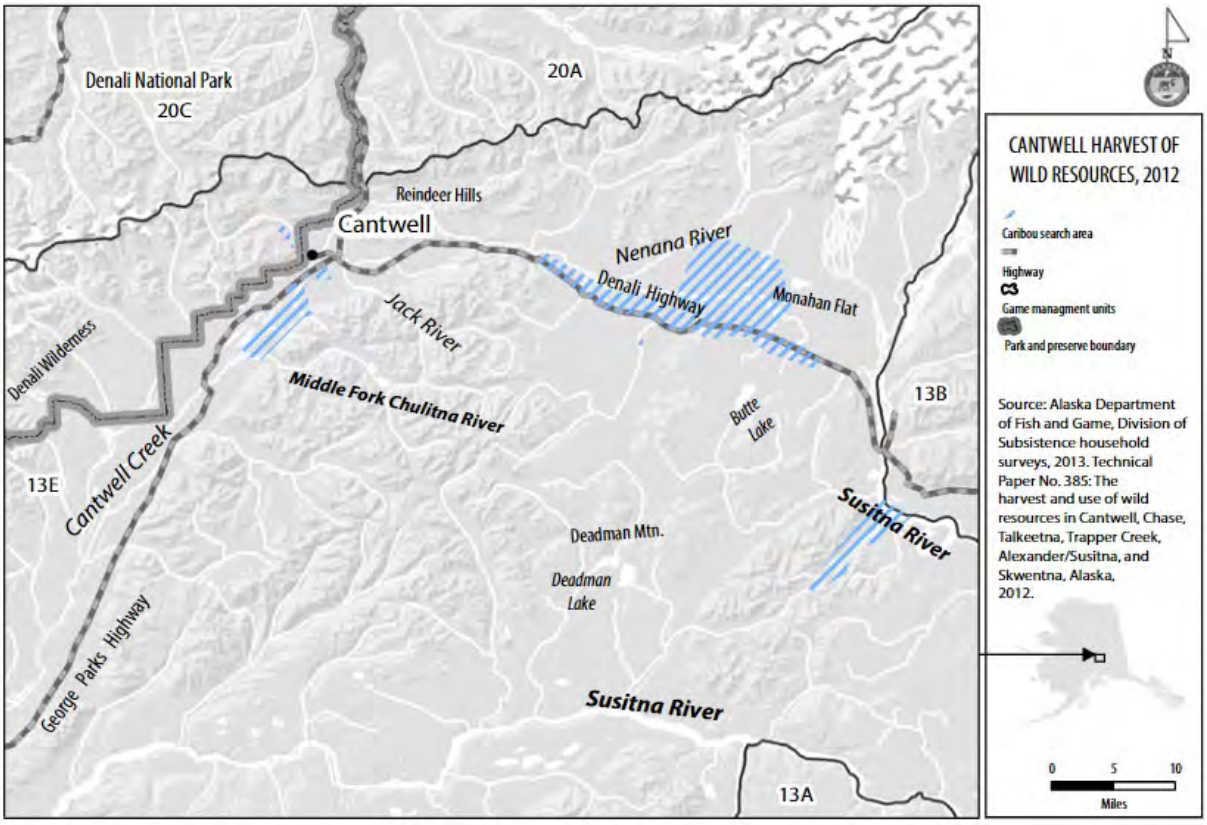


Figure 27. Cantwell's documented search areas for caribou, 2012 (Holen et al. 2014).

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%

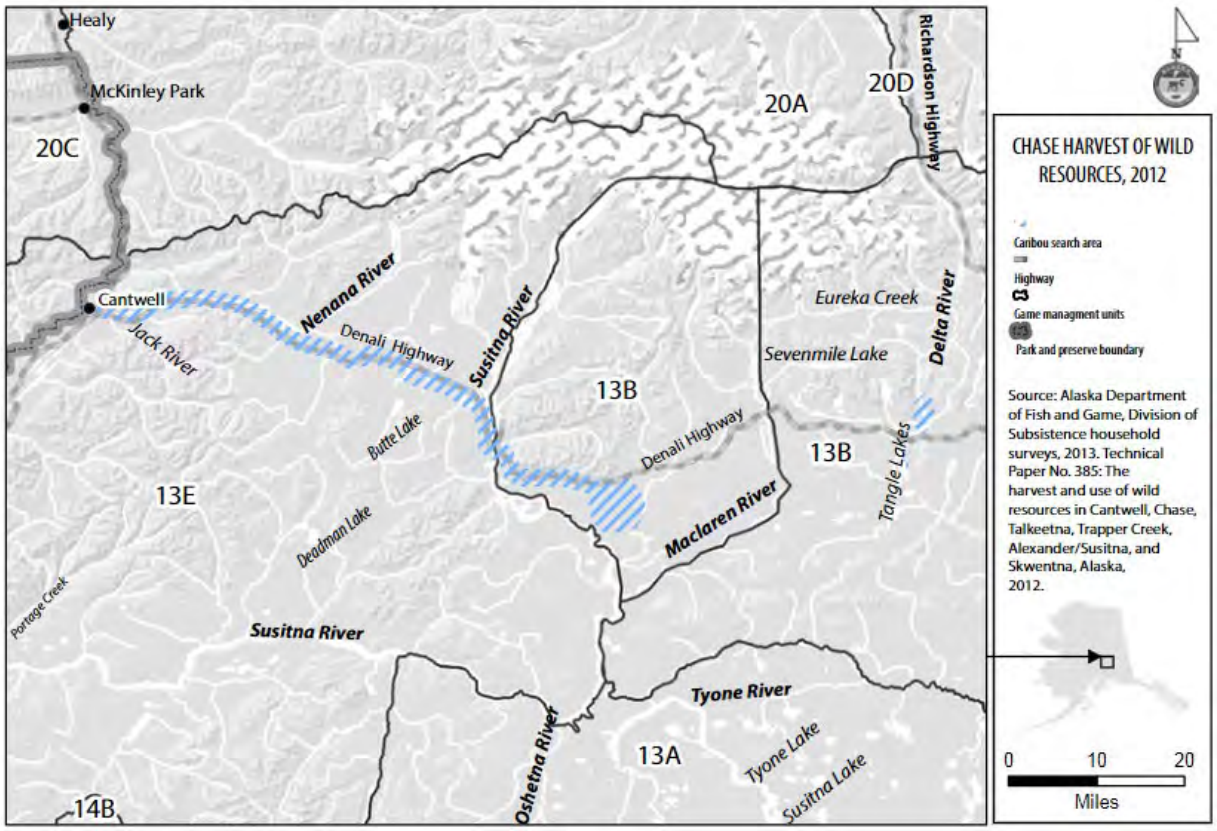


Figure 28. Chase's documented search areas for caribou, 2012 (Holen et al. 2014).

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%

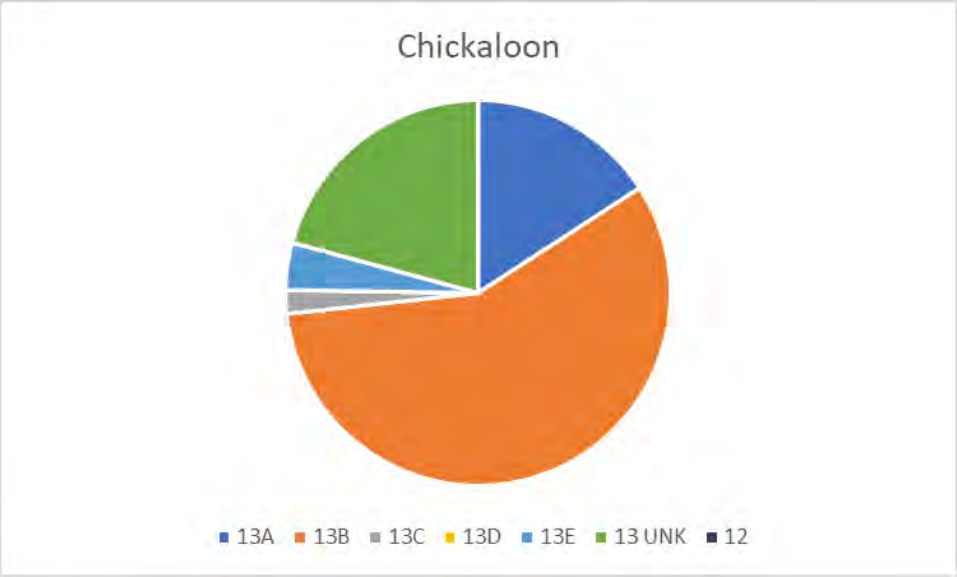


Figure 29. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Chickaloon's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-seven percent of Chickaloon's harvests occurred in Unit 13B, 21% took place in an unknown sub-unit 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%

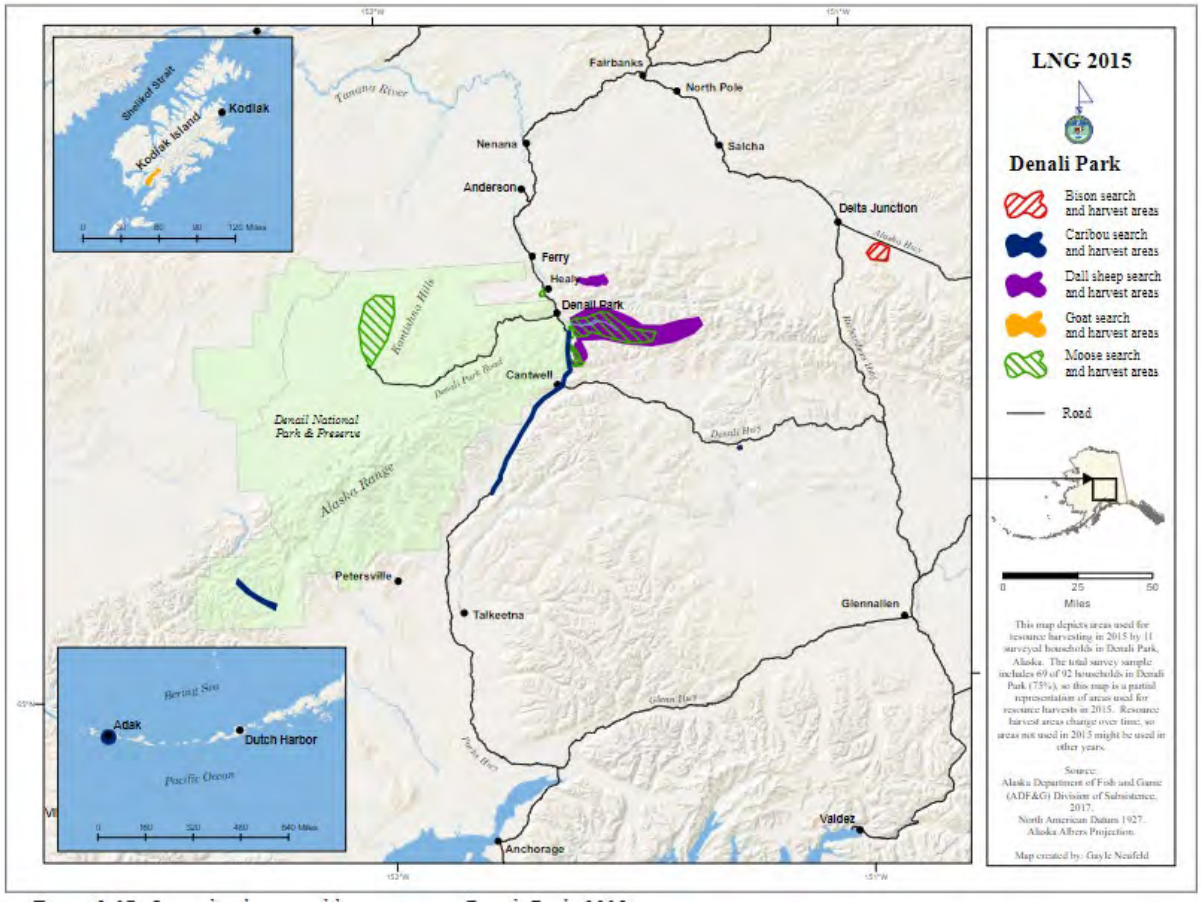


Figure 30. Denali Park's documented search area for caribou and other species, 2015 (Brown et al. 2017).

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**).

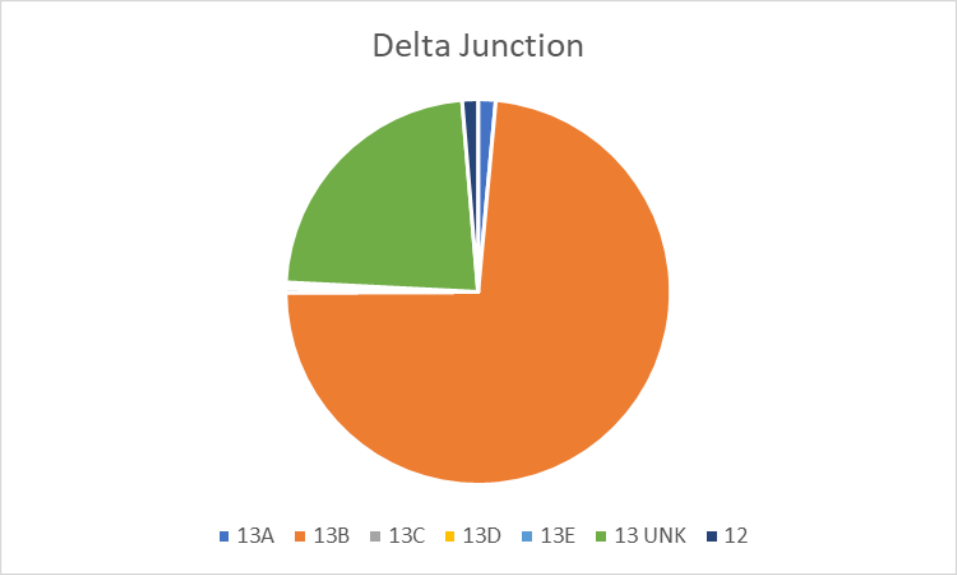


Figure 31. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Delta Junction's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-three percent of harvest took place in Unit 13B, 23% in an unknown subunit of Unit 13, and smaller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

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

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

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%

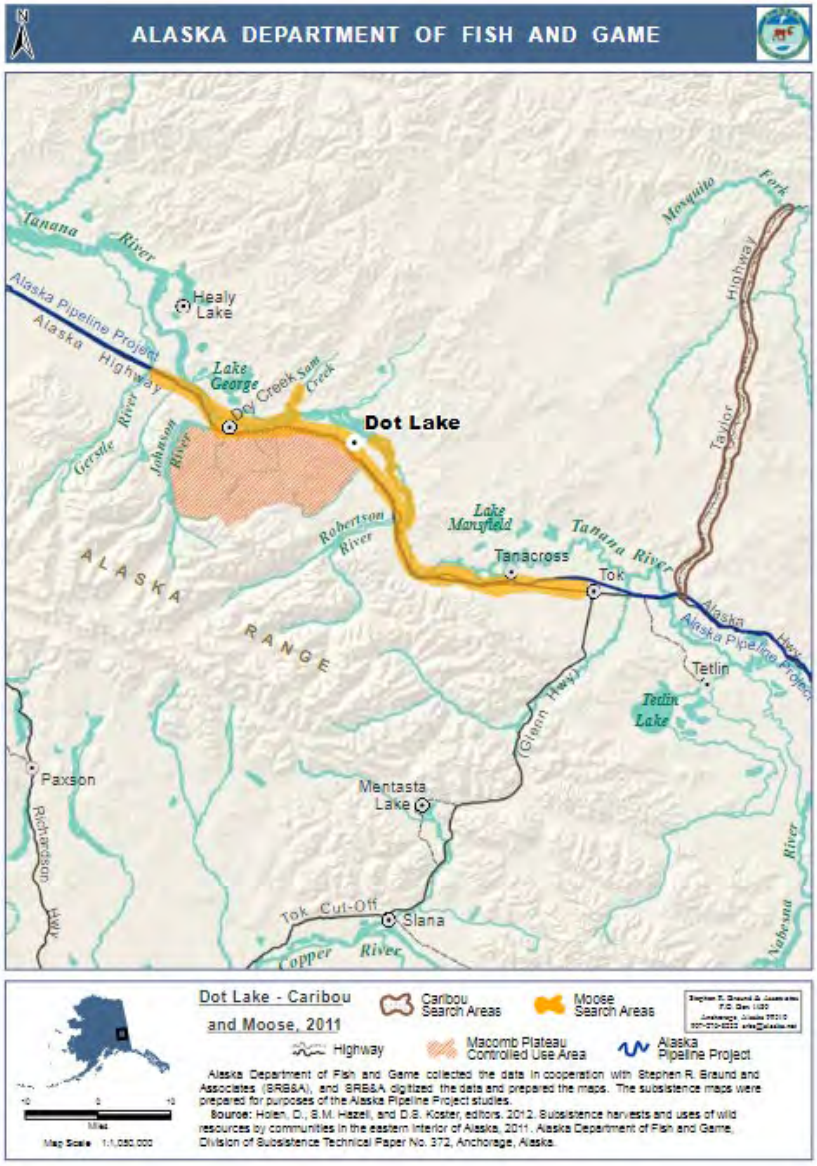


Figure 32. Dot Lake's documented search areas for caribou, 2011 (Holen et al. 2012).

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%

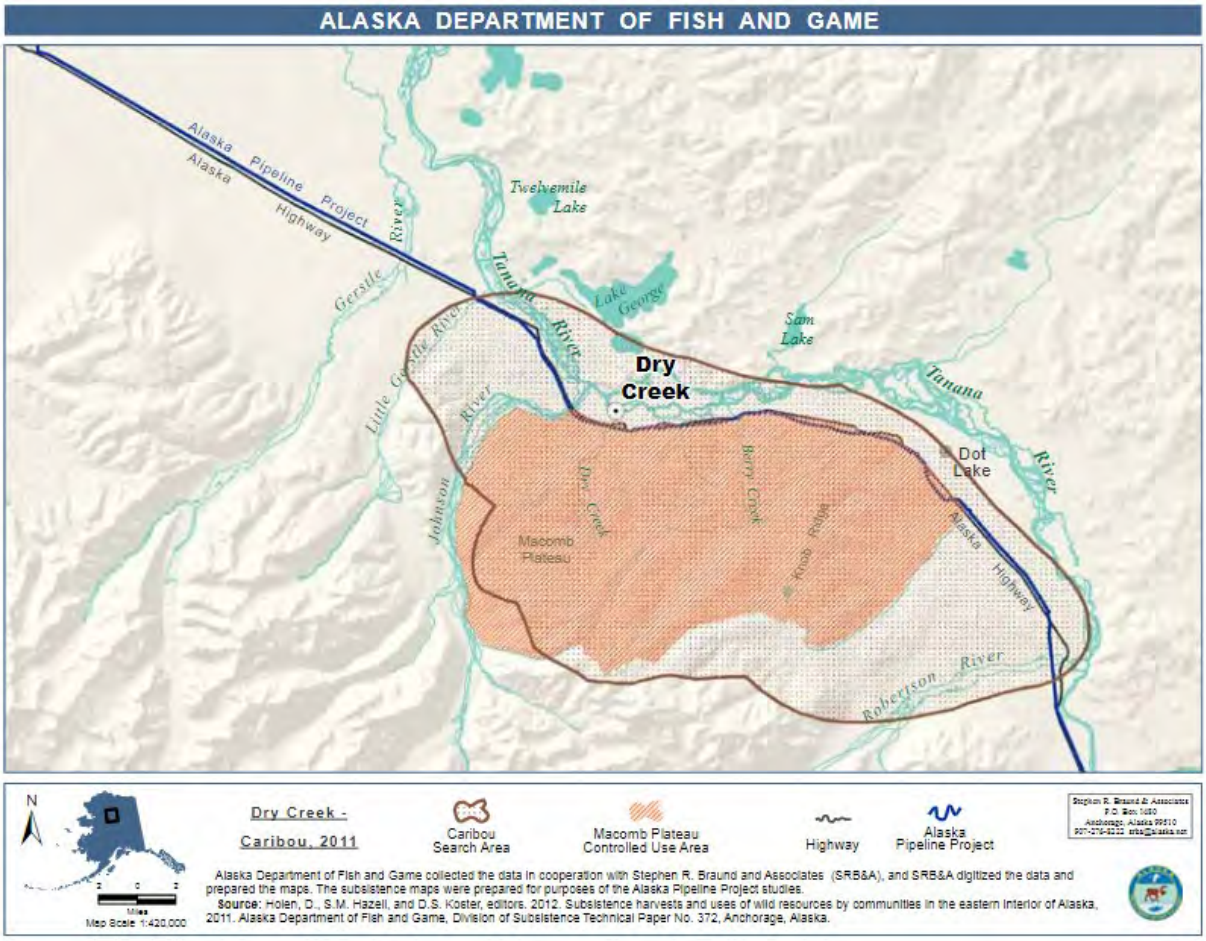


Figure 33. Dry Creek's documented search area for caribou, 2011 (Holen et al. 2012).

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).

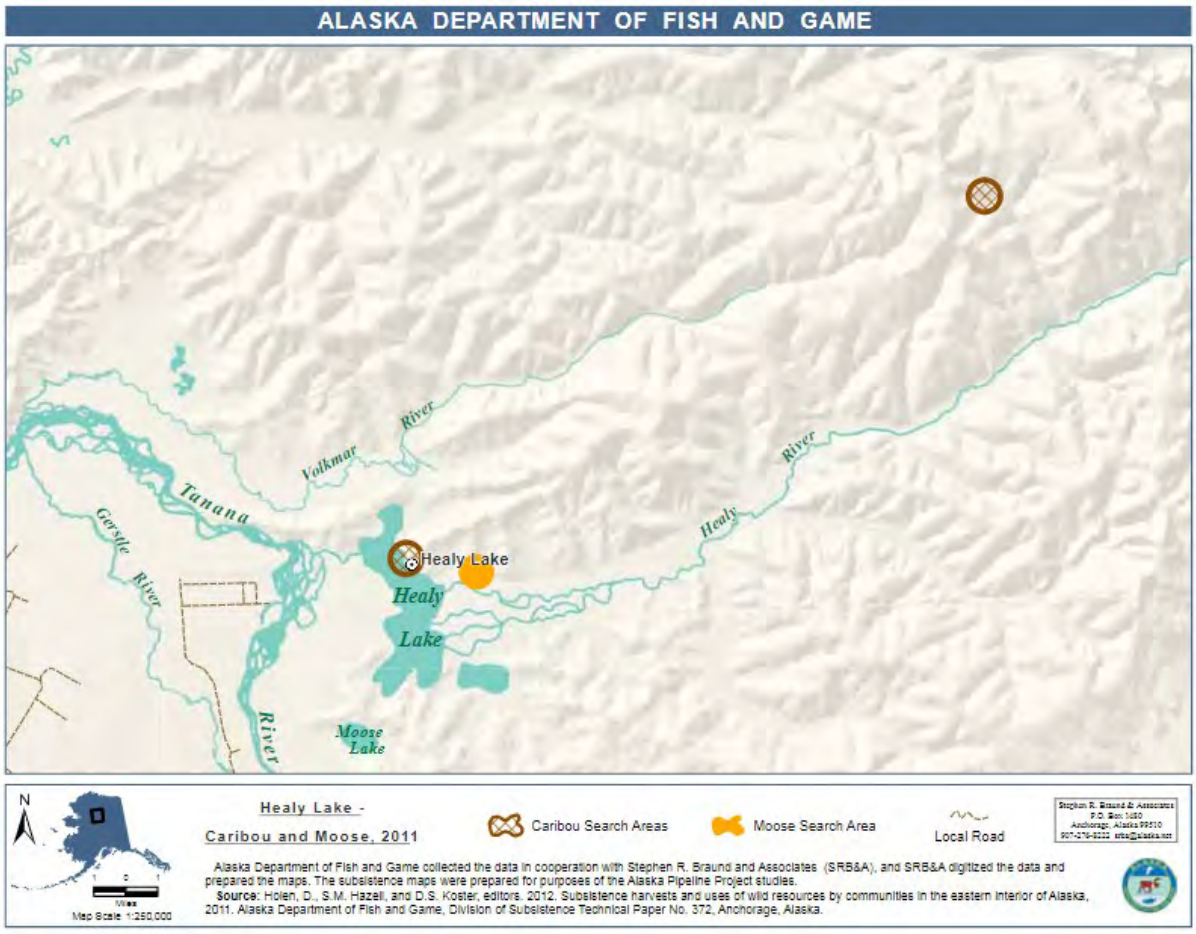


Figure 34. Healy Lake's documented search areas for caribou (and moose), 2011 (Holen et al. 2012).

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.

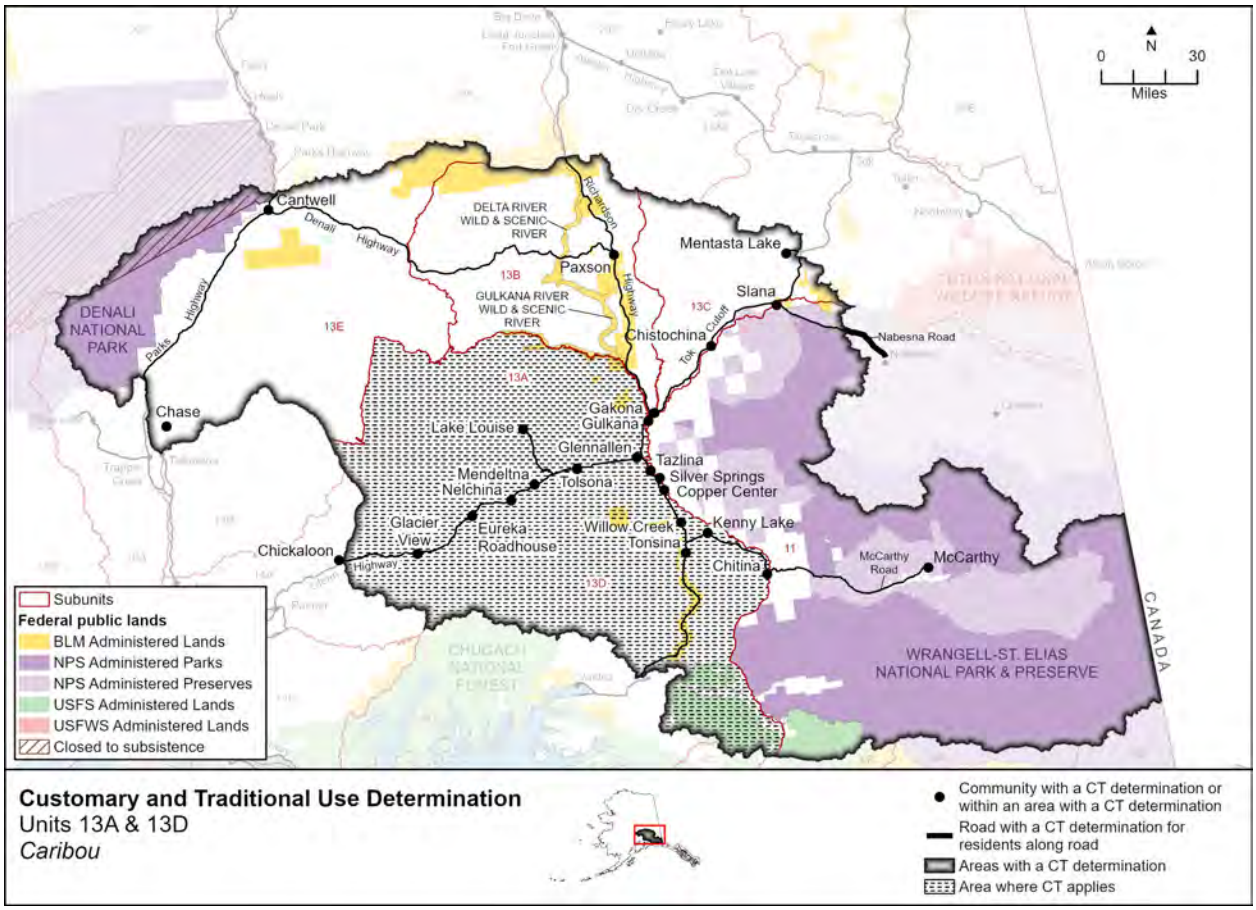


Figure 35. Communities and areas with a customary and traditional use determination for Units 13A and 13D.

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.

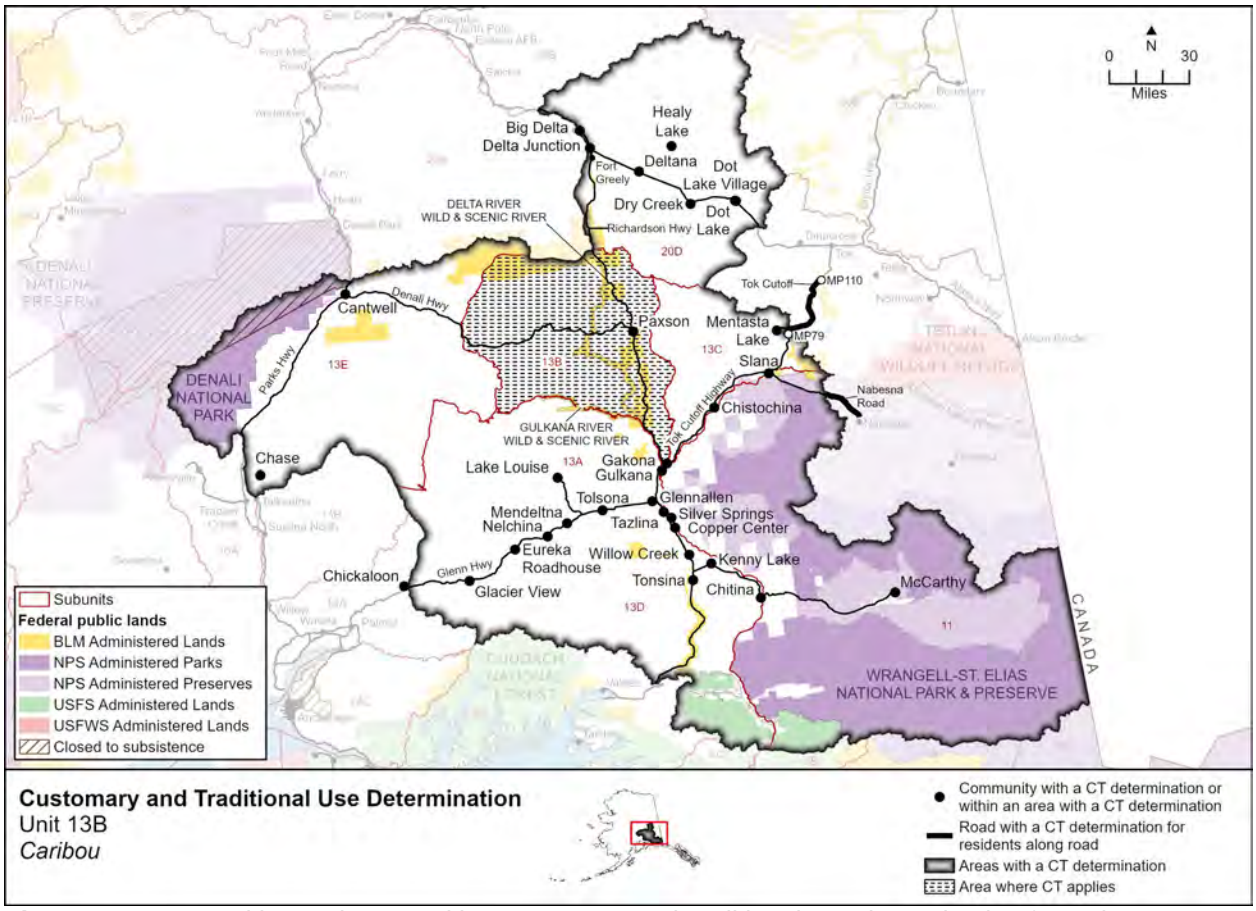


Figure 36. Communities and areas with a customary and traditional use determination for Unit 13B.

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.

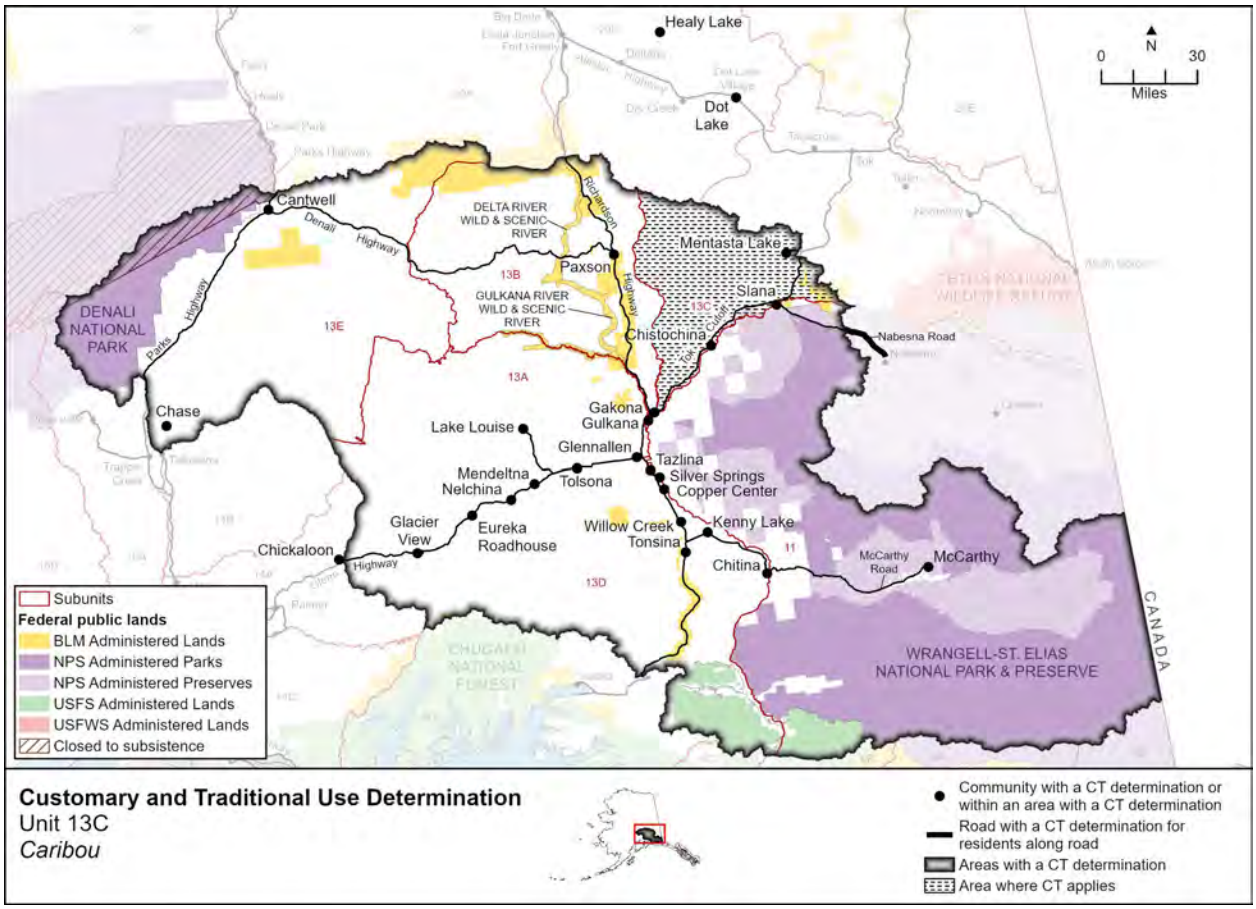


Figure 37. Communities and areas with a customary and traditional use determination for Unit 13C.

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.

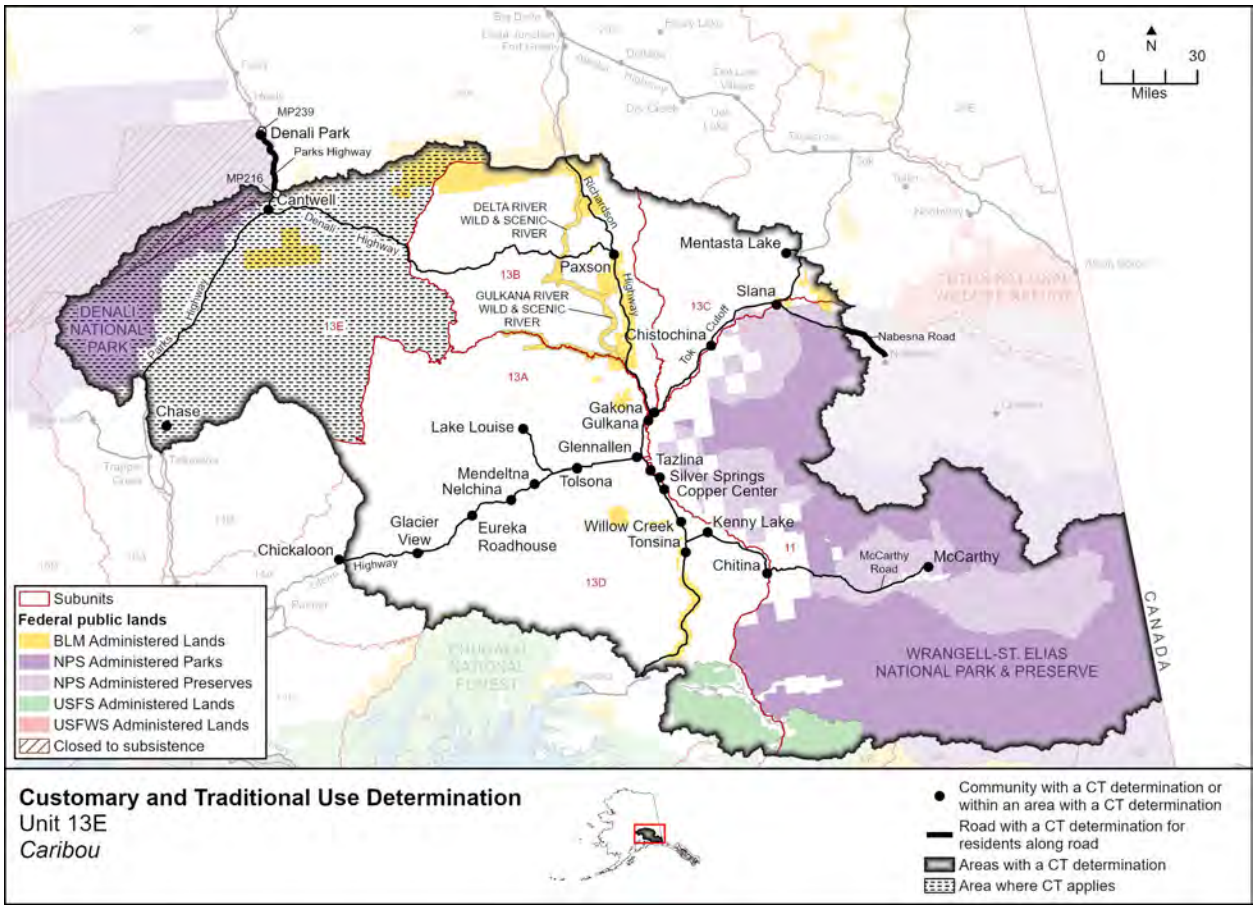


Figure 38. Communities and areas with a customary and traditional use determination for Unit 13E.

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.

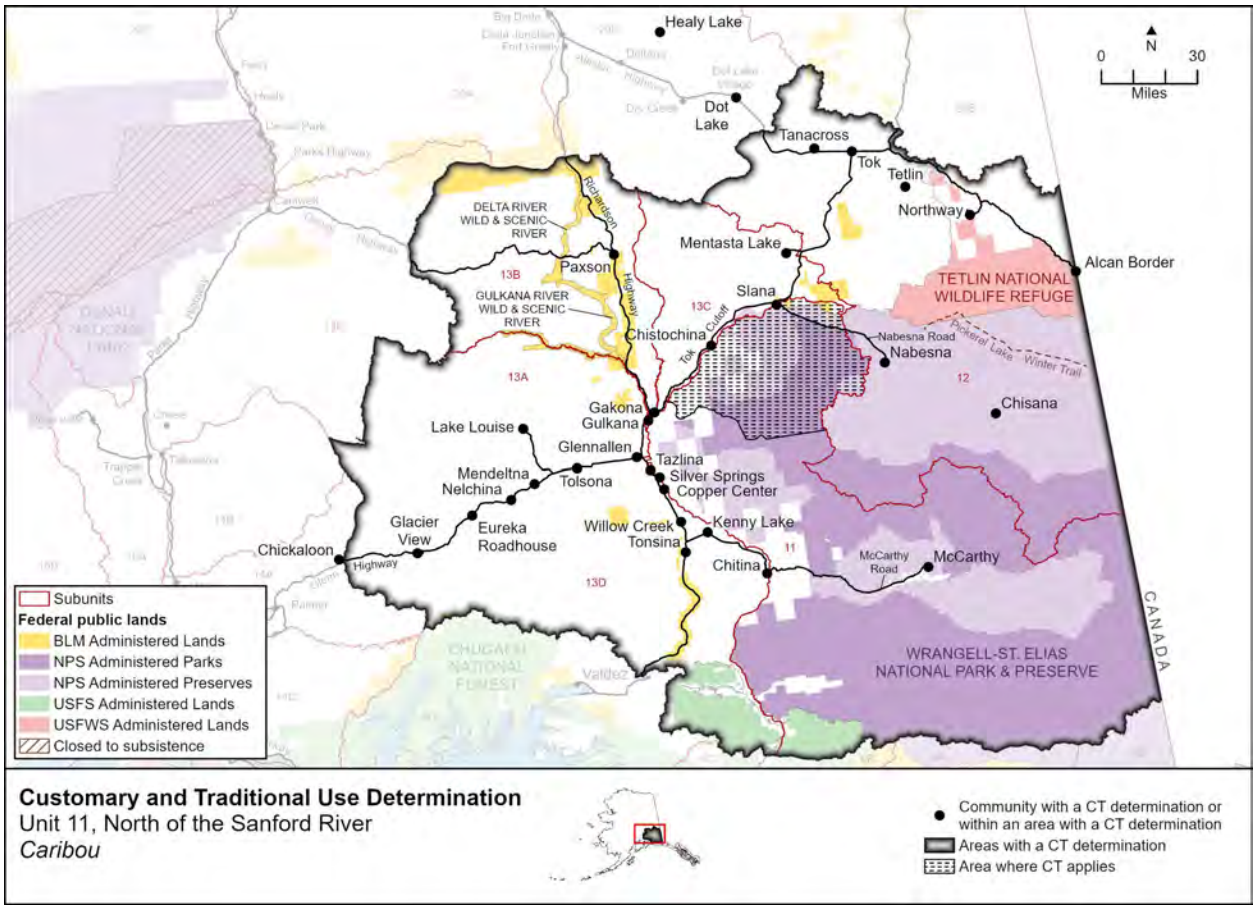


Figure 39. Communities and areas with a customary and traditional use determination for Unit 11 north of the Sanford River.

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.

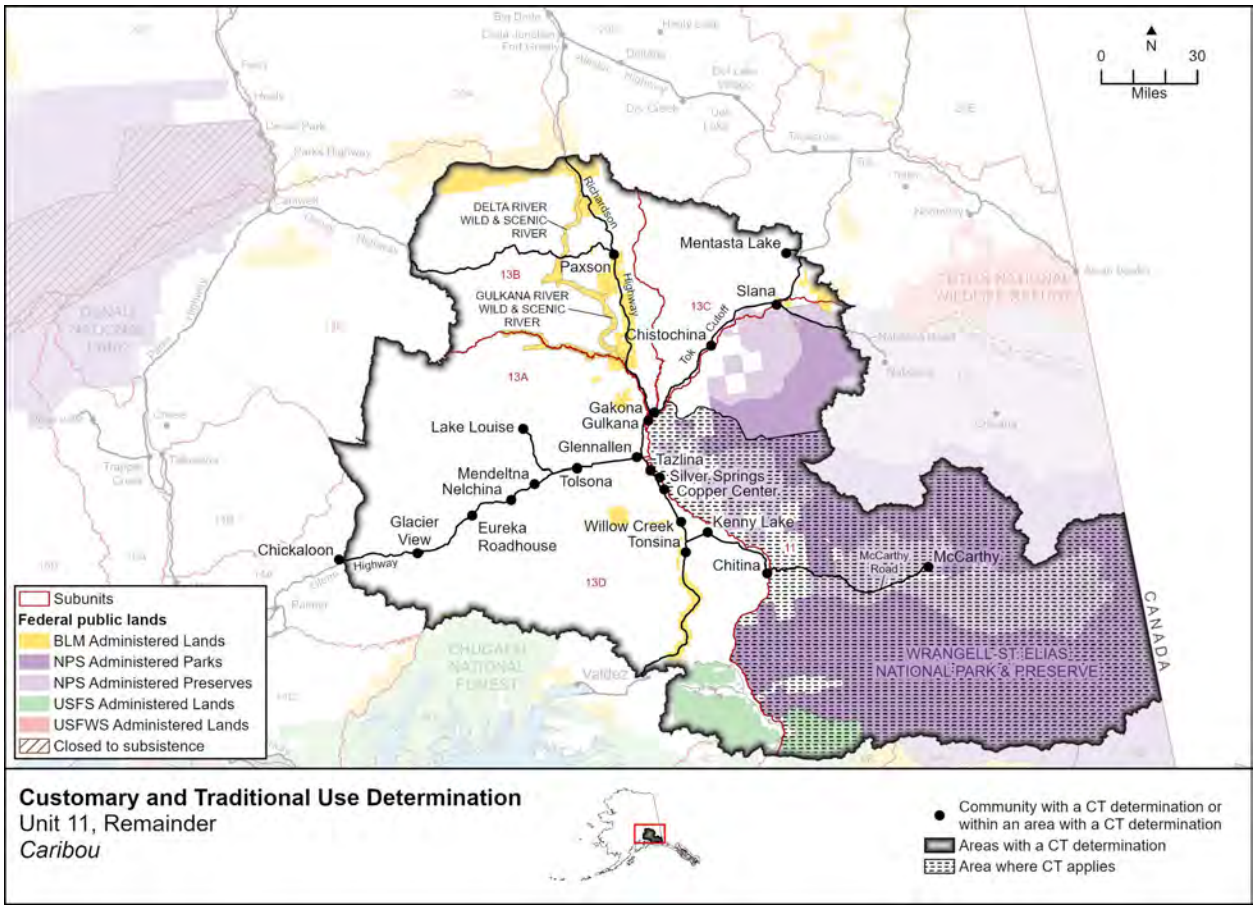


Figure 40. Communities and areas with a customary and traditional use determination for Unit 11 remainder.

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.

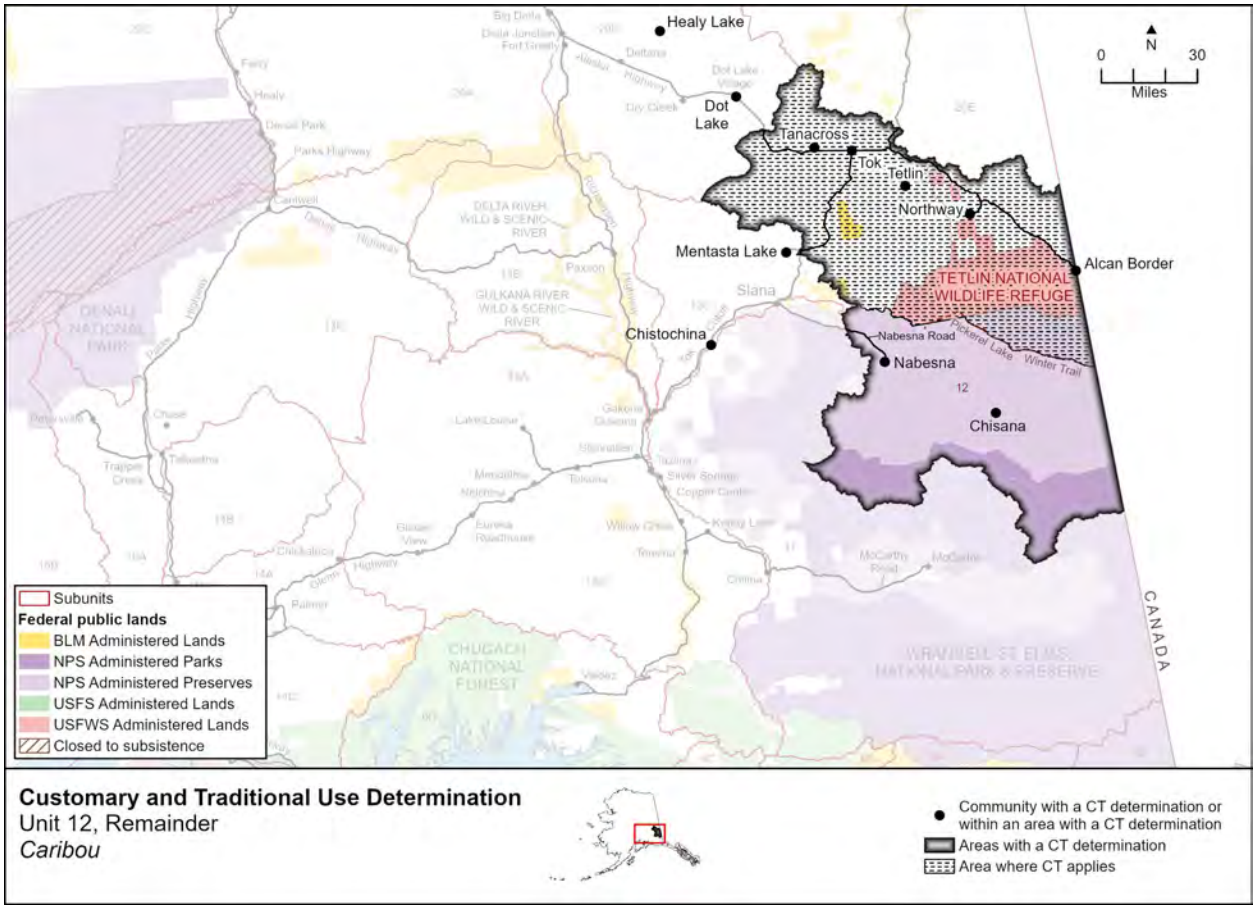


Figure 41. Communities and areas with a customary and traditional use determination for Unit 12.

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, and 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 by unit and is not meaningful for interpreting the information in this table.

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

Community	Top Five Resources by weight, Descending, in Most Recent Survey Year
Glacier View	Moose, Sockeye Salmon, Coho Salmon, caribou, Halibut
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**).

The modified regulation should read:

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

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,***	***May be announced between*** *Aug. 1–Sep. 30* ***May be announced between*** *Oct. 21–Mar. 31*

Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations. ***Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.***	
Unit 13, remainder—2 bulls by Federal registration permit only (FC1302) ***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.*** ***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.****	***May be announced between** Aug. 1–Sep. 30* ***May be announced between** Oct. 21–Mar. 31*

* 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's 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.

LITERATURE CITED

ADF&G. 2001. Caribou management report of survey-inventory activities 1 July 1998–30 June 2000. C. Healy, editor. Project 3.0. Juneau, Alaska.

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

ADF&G. 2010a. Overview of Nelchina Caribou Herd Regulation and Harvest History. Special Publication No. BOG 2010-05.

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

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

ADF&G. 2017b. 2017 Nelchina Caribou News. Glennallen, AK. ADF&G, Division of Wildlife Conservation.

ADF&G. 2018. 2018 Nelchina caribou herd fall composition survey and population estimate. Heidi Hatcher, Wildlife Biologist. Glennallen, AK. Memorandum. ADF&G, Division of Wildlife Conservation.

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

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

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

ADF&G. 2022b. 2022 Nelchina caribou herd spring and summer status in Unit 13. Heidi Hatcher, Wildlife Biologist. Glennallen, AK. Memorandum. ADF&G, Division of Wildlife Conservation.

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

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

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

ADF&G. 2023d. 2023 Nelchina Caribou News. Glennallen, AK. ADF&G, Division of Wildlife Conservation.

ADF&G. 2023e. Annual Report to the Alaska Board of Game on Intensive Management for Fortymile Caribou with Wolf Predation Control in the Upper Yukon-Tanana Predation Control Area of Game Management Units 12, 20B, 20D, 20E and 25C. ADF&G, Division of Wildlife Conservation.

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

ADF&G. 2024b. Alaska Board of Game Interior and Eastern Arctic Region Meeting. Alaska Department of Fish and Game. Fairbanks, AK. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/iea/rc4_tab4.1.pdf. 12pp. Retrieved: April 18, 2024.

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

ADLWD. 2022. Alaska Department of Labor and Workforce Development: Alaska population estimates: Cities and Census Designated Places (CDPs), 2022. https://live.laborstats.alaska.gov/data-pages/alaska-population-estimates. Retrieved May 1, 2024.

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

Botz, J., C. W. Russell, J. Morella, and S. Haught. 2021. 2020 Prince William Sound area finfish management report. Alaska Department of Fish and Game, Fishery Management Report No. 21-18, Anchorage, AK.

Brown, C. L., M.L. Kostick, C.B.M. McDavid, C.R. McDevitt, A. Trainor, and J. Park. 2017. Harvest and Use of Subsistence Resources in 4 Communities in the Nenana Basin, 2015. Technical Paper No. 429. Fairbanks, AK.

Caikoski, J. 2023. Management Coordinator/ Wildlife Biologist. Personal Communication: E-mail. ADF&G, Division of Wildlife Conservation. Fairbanks, AK.

Case, M. F. 1986. Wild Resource use In Northway, Alaska. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 132. Fairbanks, AK.

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

Godduhn, A. R. and M.L. Kostick. 2016. Harvest and use of wild resources in Northway, Alaska, 2014, with special attention to nonsalmon fish. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 421. Fairbanks, AK.

Haynes, T. L., M. Case, M., J.A. Fall, J. A., L. Halpin, and M. Robert. 1984. *The use of Copper River* salmon and other wild resources by Upper Tanana communities, 1983-1984. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 115. Fairbanks, AK.

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

Hatcher, H. 2024. Wildlife Biologist. Personal communication: E-mail. ADF&G, Division of Wildlife Conservation. Glennallen, AK.

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

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

Holen, D., S. M. Hazell, and D.S. Koster. 2012. Subsistence harvests and uses of wild resources by communities in the Eastern Interior of Alaska, 2011. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 372. Anchorage, AK.

Holen, D., S.M. Hazell, J.M. Van Lanen, J.T. Ream, S.P.A. Desjardins, B. Jones, and G. Zimpelman. 2014. The harvest and use of wild resources in Cantwell, Chase, Talkeetna, Trapper Creek, Alexander/Susitna, and Skwentna, Alaska, 2012. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 385. Anchorage, AK.

Holen, D., S. M. Hazell, and G. Zimpelman, editors. 2015. The Harvest and Use of Wild Resources in Selected Communities of the Copper River Basin and East Glenn Highway, Alaska, 2013. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 405. Anchorage, AK.

Jacobs. 2024. McCarthy Road Planning and Environmental Linkages (PEL) Study Needs and Opportunities Assessment Report. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://mccarthyroadpel.com/wp-content/uploads/2024/04/McCarthyRdPEL_NeedsOppReport.pdf. Retrieved July 9, 2024.

Joy, P. J., S. B. Haught, R. E. Brenner, S. Miller, J. W. Erickson, J. W. Savereide, and T. R. McKinley. 2021. Escapement goal review of Copper and Bering Rivers and Prince William Sound Pacific salmon stocks, 2020. Alaska Department of Fish and Game, Fishery Manuscript No. 21-02, Anchorage, AK.

Koskey, M. 2007. Subsistence Resource Use among ten Tanana River Valley communities: 2004-2005. Unpublished report. ADF&G, Division of Subsistence.

Kukkonen, M. and G. Zimpelman. 2012. Subsistence Harvests and Uses of Wild Resources in Chistochina, Alaska, 2009. Anchorage: Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 370. Anchorage, AK.

La Vine, R., M. Kukkonen, B. Jones, and G. Zimpelman. 2013. Subsistence Harvests and Uses of Wild Resources in Copper Center, Slana/Nabesna Road, Mentasta Lake, and Mentasta Pass, Alaska, 2010. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 380. Anchorage, AK.

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

Marcotte, J. R. 1991. Wild fish and game harvest and use by residents of five Upper Tanana communities, Alaska. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 168. Juneau, AK.

Martin, G. 1983. Use of natural resources by the residents of Dot Lake, Alaska. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 19. Fairbanks, AK.

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

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

Mulligan, B. 2024. Deputy Commissioner. Personal communication: email. ADF&G. Anchorage, AK.

NPS. 2023a. Analysis ICTP23-01. Denali Park Individual C&T. Federal Subsistence Board Supplemental Work Session Materials for August 2-3, 2023. https://www.doi.gov/sites/doi.gov/files/ictp23-01-blaine-mayo-compiled-supplemental-materials-20230728-v2.pdf. Retrieved August 16, 2024.

NPS. 2023b. Analysis ICTP23-02. Denali Park Individual C&T. Federal Subsistence Board Supplemental Work Session Materials for August 2-3, 2023. https://www.doi.gov/sites/doi.gov/files/ictp23-02-kevin-mayo-compiled-supplemental-materials-20230728-v3.pdf. Retrieved August 16, 2024.

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

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

OSM. 2023a. Staff Analysis WP24-09. Office of Subsistence Management, USFWS. Anchorage, AK.

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

OSM. 2024a. Federal permits database. https://subsistence.fws.gov/. Retrieved April 11, 2024.

OSM. 2024b. Staff Analysis. WSA24-04. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM. 2024c. Staff Analysis. WSA24-06. Office of Subsistence Management, USFWS. Anchorage, AK.

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

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

Robbins, W.F. 2014. Unit 13 moose. Chapter 12, Pages 12-1 through12-14 in P. Harper and L.A. McCarthy, editors. Moose management report of survey and inventory activities. 1 July 2011-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2014-6, Juneau, AK.

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

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

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

Simeone, W. E. 2002. Wild resource harvests and uses by residents of Cantwell, Alaska, 2000. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 272. Juneau, AK.

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

Simeone, W. E., W. Justin and M. Anderson and K. Martin. 2019. The Ahtna homeland. Alaska Journal of Anthropology 17(1 & 2), 102–119.

Stanek, R. T., Foster, D. J., & Fall, J. A. 1988. The harvest and use of fish, game, and plant resources by the residents of Chase, Gold Creek-Chulitna, and Hurricane-Broad Pass, Southcentral Alaska. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 161. Anchorage, AK.

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

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

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

U.S. Census Bureau. 2012. 2010 census of population and housing, summary population and housing characteristics, CPH-1-3, Alaska. U.S. Government Printing Office, Washington, DC.

U.S. Census Bureau. 2020. Profiles. https://data.census.gov/profile. Retrieved July 19, 2024.

Wells, J. J. 2023. Moose management report and plan, Game Management Unit 12: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-24, Juneau.

WRST. 2024. Wrangell-St. Elias National Park and Preserve Subsistence and Anthropology Report. Spring 2024. WRST. Copper Center, AK.

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

THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

Office of the Commissioner
Headquarters Office

1255 West 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526
Main: 907.465.6136
Fax: 907.465.2332

June 26, 2024

Ben Bobowski - Superintendent
Wrangell-St. Elias National Park & Preserve
PO Box 439
Mile 106.8 Richardson Highway
Copper Center, AK 99573

Mr. Bobowski,

I am writing to you to consider taking management actions in the Copper River Federal subsistence fisheries within the Chitina and Glennallen Subdistricts for conservation of Chinook salmon. As you may be aware, the State of Alaska (State) took management actions this week (effective June 24) prohibiting the retention of Chinook salmon in the Chitina Subdistrict personal use and Upper Copper River sport fisheries based on assessment that indicated the Copper River drainagewide Chinook salmon sustainable escapement goal (SEG) of 21,000-31,000 may not be achieved without reducing harvest. In addition, the Copper River District subsistence and commercial fisheries, when open, have been managed conservatively and have not been allowed to fish within the expanded Chinook salmon inside closure area for the majority of the Chinook salmon run and have been restricted to fishing outside the standard Chinook salmon inside closure area for the last three periods with only 5% of the Chinook salmon run remaining. These actions were taken based on the review of the inseason assessment data collected by the State and Native Village of Eyak projects that have indicated a weaker Chinook salmon run than expected.

The current projection from the mark-recapture fishwheel project run by the Native Village of Eyak indicates that the Chinook salmon abundance estimate will be near the lower bound of the SEG of 21,000. In addition, Chinook salmon apportionment at the Miles Lake sonar is similar to that observed in 2021 when the lower bound of the SEG was not achieved (the final 2021 estimated Chinook salmon escapement was approximately 18,500). The projection is supported by the Gulkana River counting tower project counts that are below average and final Chinook salmon passage is projected to be half the historic average. Recent anecdotal harvest reports from sport, personal use, and subsistence fisheries indicate a Chinook salmon run strength that is below expected. These all indicate that further restrictions to reduce Copper River Chinook salmon harvest must be taken.

This most recent data has forced me to make the difficult decision to close all State-managed Upper Copper River Chinook salmon fisheries, including the Glennallen Subdistrict subsistence fishery to the retention of Chinook salmon effective 12:01 a.m. Saturday, June 29. This action

will entail no sport fishing for Chinook salmon, no retention of Chinook salmon in the personal use and subsistence fisheries, and require that fishwheels in the Glennallen Subdistrict will need to be closely attended and release any Chinook salmon caught immediately. I take closing the subsistence fishery seriously, but all assessment indicates that if there is a chance to achieve the lower bound of the SEG all Chinook salmon harvest must cease for the 2024 season.

Both State and Federal regulations identify a positive Customary and Traditional Use for salmon stocks in the Copper River drainage. This is not species specific, but for all salmon species. Under State regulations, the amounts of salmon that are reasonably necessary for subsistence uses are identified (5 AAC 01.616) for the Glennallen Subdistrict and Copper River District. Based on the current sockeye salmon run status, I believe that subsistence needs in the Upper Copper River District will be addressed through sockeye salmon harvests. It is imperative that the State and Federal management is consistent in the common goal of doing everything possible to achieve the Copper River Chinook salmon SEG in 2024 and I request that you align Federal subsistence management with State management in the Upper Copper River District.

Sincerely,

Doug Vincent-Lang
Commissioner

Cc:
Dave Sarafin, Fisheries Biologist, Wrangell-St. Elias National Park & Preserve
Sarah Creachbaum, Regional Director, National Park Service
Israel Payton, Director, Division of Sport Fish – ADF&G
Sam Rabung, Director, Division of Commercial Fisheries – ADF&G
Ben Mulligan, Deputy Commissioner – ADF&G
Amy Wiita, Deputy Director, Subsistence Section – ADF&G
Forrest Bowers, Deputy Director, Division of Commercial Fisheries – ADF&G
Tom Taube, Deputy Director, Division of Sport Fish – ADF&G

United States Department of the Interior

NATIONAL PARK SERVICE

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

IN REPLY REFER TO:

1.A.2

June 29, 2024

Doug Vincent-Lang, Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Commissioner Vincent-Lang:

Thank you for your June 26th letter, requesting that I consider taking management actions in Federal subsistence fisheries within the Chitina and Glennallen Subdistricts of the Copper River Drainage for conservation of Chinook salmon populations. As requested, I have seriously considered the current circumstances, including the State of Alaska's (State's) assessment of inriver Chinook salmon run strength as outlined in your letter and in the June 26th Copper River Management Update distributed via email by Mark Somerville, the State's Upper Copper / Upper Susitna Area Manager, in addition to management actions that have been taken by the State in the Upper Copper River fisheries. I have considered anecdotal reports of inriver Chinook salmon harvest by Federal subsistence users thus far this season, have further assessed data for Chinook salmon harvest timing and amounts in Federal fisheries during recent years including the 2021 season, when the State's end-of-season determination was that the Chinook salmon sustainable escapement goal (SEG) was not met, and have reviewed my reasoning for not having taken actions in 2021.

In addition to the factors listed above, I have considered two factors that provide new context for 2024 in comparison with the 2021 season, and have deliberated on the question as to whether 2024 circumstances warrant a different decision than the one that I made in 2021. The first of these additional factors is the fact that, if the lower bound SEG for Chinook salmon is not met in 2024, it will be the second such occurrence in four years and, importantly, this second occurrence in 2024 will reflect a failure to have met an escapement goal (21,000 salmon) that is *lower* than the goal (24,000 salmon) that was not met in 2021. It is relevant to note that I opposed this change in the Copper River Chinook salmon lower-bound SEG from 24,000 salmon to 21,000 salmon, which was made by the Alaska Board of Fisheries (Board) during its November-December 2021 Prince William Sound / Upper Copper and Upper Susitna Rivers Finfish and Shellfish meeting in Cordova, based on staff analyses and recommendations from the Alaska Department of Fish and Game (Department). For the reasoning behind my opposition (which remains valid), see PC245 in the compilation of on-time public comments on the meeting website. Reflecting on the Board's decision to accept the Department's SEG recommendation in 2021 causes me to wonder whether the Copper River District commercial fishery might have been managed differently (more conservatively) during the early portion of the 2024 season if the lower-bound escapement goal was still

24,000 Chinook salmon rather than having been lowered to 21,000 Chinook salmon. The second factor that provides new context for the 2024 Chinook salmon situation in the Copper River is the recent petition to list Gulf of Alaska Chinook salmon as a threatened or endangered species under the Endangered Species Act (ESA). NOAA Fisheries has found that this petition "…presents substantial scientific or commercial information indicating that the petitioned action may be warranted...," and has commenced a review of the status of Gulf of Alaska Chinook salmon, including Copper River stocks, to determine whether listing is warranted.

I have carefully considered these factors, consistent with the guidelines for reviewing proposed special actions in the delegation of authority from the Federal Subsistence Board, and have benefitted from consultation and discussions with many thoughtful staff, Federal subsistence users, and other stakeholders. Ultimately, my deliberations and consultations with others have led me to the same conclusion that I reached in 2021. I have decided not to take action restricting the retention of Chinook salmon in Federal subsistence fisheries in the Copper River Drainage. Instead, I have issued an updated fisheries advisory notice to Federal subsistence users, strongly recommending that they release healthy Chinook salmon, with additional instructions for handling salmon in a manner that minimizes risk of salmon mortality following release.

This was a very difficult decision for me, as my initial inclination was to ensure that my management of Federal subsistence fisheries would serve to increase the likelihood of achieving the Chinook salmon SEG this season. The management actions that I might have taken in Federal subsistence fisheries may have contributed to Chinook salmon conservation, but, as in 2021, I concluded that these contributions would have been nominal relative to the burden placed on Federal subsistence users, and especially in comparison with the number of Chinook salmon harvested by the commercial fishery prior to your request that I consider taking Federal actions in the Upper Copper River for Chinook salmon conservation. Based on reported Federal subsistence harvest amounts in recent years including 2021, we estimate that restrictions on Chinook salmon retention in Federal subsistence fisheries might increase escapement by 90 - 300 salmon, not accounting for mortality following release. In comparison, conservative management of the Copper River District commercial fishery as of June 25th resulted in more than 8,300 Chinook salmon being harvested (nearly 40 percent of the lower bound SEG), including more than 1,300 Chinook salmon during four open-fishing periods that occurred after the Department's manager of State fisheries in the Upper Copper River reported on June 12th that the cumulative number of Chinook salmon captured as of this date by Native Village of Eyak (NVE) fishwheels was the lowest since 2013 and the second lowest overall since 2002. Although the low capture rate was not a definitive indicator of low run strength, this observation and overall uncertainty about the strength of the Chinook salmon return at this point of the run suggested that there was a continuing need for a cautious approach to Chinook salmon harvest management. Yet on June 15th, the State announced in Prince William Sound Salmon Fishery Announcement #12 that the spatial extent of inside waters closed to commercial harvest would be reduced on June 17th from the "expanded inside closure area" to the "standard inside closure area." During the June 17th – June 18th 36-hour open fishing period, commercial harvest of Chinook salmon was approximately 384 salmon – more than might be saved by restricting Chinook salmon harvest in Federal subsistence fisheries. As I finalize my letter to you today, the commercial opener that occurred *after* I received your letter is beginning to tally additional Chinook harvest in the Copper River District.

Looking ahead beyond this current circumstance, now is the time to truly implement a more comprehensive, transparent, and collaborative approach to sustainable fisheries management, encompassing the full geographic and genetic extent and diversity of Copper River salmon populations. At minimum, management of the commercial fishery and all inriver fisheries should be re-envisioned and transparently integrated through a coordinated framework for sustainably managing *all* Copper River Chinook and sockeye salmon populations for all fishing interests.

Given our mutual concerns and shared stewardship responsibilities, there now exists an opportunity for us to collaborate by working together to address the salmon fishery holistically, authentically, and sincerely. We should work together to avoid concerns of any Copper River salmon population ever being listed as threatened or endangered under the Endangered Species Act. I offer two specific opportunities to collaborate in the spirit of our mutual concerns and shared stewardship responsibilities.

First, in April of this year I submitted a proposal to the Alaska Board of Fisheries to align the timing of the commercial fishery with early-season sonar passage due to our concerns about multiple potential effects of persistently high early-season harvests (attached). This proposal, if adopted by the Board, may very well reduce the likelihood of a future reoccurrence of the Chinook salmon concern that we together face today, as it is not coincidental that early commercial fishery openers targeting high-market-value Chinook salmon also disproportionately harvest early run stocks of sockeye salmon destined for upper Copper River tributaries, impacting the food security and cultural traditions of rural subsistence users. I invite you to work with me to improve my initial proposal by ensuring a collaborative approach to solving these issues. As outlined in the proposal, I sincerely respect all of the different fishing interests, but highlight that the timing of commercial fishery openings is important for ensuring adequate escapement for all Copper River stocks, throughout the entire run, consistent with the "portfolio effect" principle endorsed by many of the Department's talented scientists.

Second, the National Park Service has been funded through the Inflation Reduction Act to convene a diverse group of fisheries experts and stakeholders who will work together to develop tools and approaches for managing Copper River salmon fisheries in the context of changing environmental conditions and management challenges. I invite you to join me with this collaborative group to work together to ensure the viability of the fishery and our local rural economies and cultural values for the future.

Crisis creates opportunities, Mr. Commissioner. This is an opportunity for us to reimagine a more collaborative and sustainable fishery, respectful of the many ways of fishing and the respective authorities that manage the opportunities for citizens and industry. If you wish to discuss this opportunity, I can be reached at 907-822-7202.

Thank you for your consideration of my comments and your support for the long-term conservation of Copper River salmon and salmon-dependent ecosystems and livelihoods of the Copper River watershed.

Sincerely,

Ben Bobowski, Ph.D.
Superintendent

Attachment: Wrangell-St. Elias 2024 Proposal to Alaska Board of Fisheries

cc: Sarah Creachbaum, Regional Director, NPS Region 11 (Alaska)
Jennifer Pederson Weinberger, Acting Associate Regional Director for Resources, NPS Region 11 (Alaska)
Crystal Leonetti, Acting Assistant Regional Director, Office of Subsistence Management
Steve Namitz, District Ranger, Cordova Ranger District, Chugach National Forest

ALASKA BOARD OF FISHERIES
Regulation Proposal Form 2024-2025
Proposals must be received Tuesday, April 10, 2024
PO BOX 115526, JUNEAU, ALASKA 99811-5526 or FAX (907) 465-6094 or online at:
https://arcg.is/1LDOCO0

BOARD OF FISHERIES REGULATIONS

☐ Subsistence ☐ Personal Use ☐ Sport ☒ Commercial

***Which meeting would you like to submit your proposal to?**

☐ Southeast and Yakutat Finfish and Shellfish ☒ Prince William Sound Finfish and Shellfish ☐ All Other Shellfish Statewide

Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.

1. Alaska Administrative Code Number: 5 AAC 24.360. Copper River District Salmon Management Plan

***2. What is the issue you would like the board to address and why?**

The issue is that management of the Copper River District commercial fishery by the Alaska Department of Fish and Game (department) in five of the six most-recent years (2018-2023) resulted in disproportionately high harvest (exploitation) rates for early run Copper River salmon stocks. Without action by the board to mitigate this issue, persistent disproportionate exploitation of stocks with early migratory timing has the potential to diminish the overall population diversity of Copper River sockeye and king salmon while threatening food security for Copper River subsistence users, and particularly those who fish upstream of the Gakona River in the uppermost portion of the Glennallen Subdistrict. The 2023 season is most representative of this concern, when more than 387,000 salmon were harvested by the commercial fishery before cumulative salmon passage at Miles Lake had reached 50 percent of the department's objective for cumulative inriver passage. (Note that this estimate for the degree to which Miles Lake salmon passage was lagging behind cumulative commercial harvest and management objectives accounts for the fact that the sonar sensor on the south bank was not operational for a full 24-hr period until 5/31.) Disproportionately high early season harvest rates occurred to a lesser extent in 2021 and 2022, and also occurred in low-run years of 2018 and 2020 before low sonar counts triggered extended closures of the commercial fishery.

Management that results in a recurring pattern of disproportionately high exploitation rates for early run salmon stocks is inconsistent with two statewide fisheries management policies. These are the Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220), which specifies in part that "… conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority;" and the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222), which specifies in part that "… salmon escapement should be managed in a manner to maintain genetic and phenotypic characteristics of the stock by assuring appropriate geographic and temporal distribution of spawners …."

Management that has the potential to adversely affect population diversity of Copper River salmon would be contrary to the "portfolio-effect" principle, which holds that conservation of population diversity is an important means of enhancing the resilience of salmon populations and associated fisheries to changing environmental conditions (Hilborn et al. 2003, Schindler et al. 2010).

Management that results in disproportionately high harvest rates for early run stocks also may exacerbate known food-security concerns of upriver subsistence users. Because of their location in the watershed, subsistence users from headwater communities have access to the fewest spawning populations, some of which are characterized by early run timing. A preliminary National Park Service assessment of 2005-2021 harvest data found that year-to-year catch stability (one measure of food security, here estimated as interannual variability in catch-per-unit-effort) was lowest (interannual variability was highest) during this period for subsistence users who fished upstream of the Gakona River compared with downstream subsistence users who fished between the Chitina River bridge and the Gakona River. This pattern of low catch stability in the uppermost reach of the Copper River applied to participants in the state subsistence fishery and as well as the federal subsistence fishery and is consistent with findings for the Fraser River in Canada (Nesbitt and Moore 2016). Past research and Alaska Native traditional knowledge indicate that Copper River salmon stocks associated with headwater tributaries are among the earliest to enter the river. Since at least 2004 (board proposal 53 in 2005) and as recently as 2023 (RC019 submitted during the board's October 12-13, 2023 work session), subsistence users have repeatedly urged fisheries managers to allow more early run salmon to reach headwater spawning tributaries.

We considered an alternative solution to this issue, but rejected it in favor of this proposed solution after conferring with department staff from the Division of Commercial Fisheries and the Division of Sport Fisheries. The alternative solution would have required the department to (1) establish a program for post-season estimation and assessment of annual exploitation rates for distinct spawning stocks of Copper River sockeye and king salmon on the basis of genetic stock composition data and other appropriate information; (2) ensure, to the extent practicable, that exploitation does not place distinct stocks at elevated risk of extirpation; and (3) report assessment results to the board on a schedule that conforms to the board cycle. We rejected the genetics-based solution in favor of *this sonar-based solution, which is far simpler and less expensive to implement, thereby enabling immediate action during this board cycle*. Nevertheless, we believe that the use of genetic data to estimate stock-specific exploitation rates ultimately may be required for ensuring the long-term conservation of diversity of Copper River sockeye and king salmon populations and the resilience of these populations and dependent fisheries, livelihoods, and cultural traditions in the context of changing environmental conditions.

We will provide further analyses and context for the issue and additional justification for the proposed regulatory change in a letter submitted to the board following issuance of the proposal book.

References

Hilborn, R., T.P. Quinn, D.E. Schindler, & D.E. Rogers. 2003. Biocomplexity and fisheries sustainability. *Proceedings of the National Academy of Sciences* 100(11):6564-6568.

Nesbitt, H.K., and J.W. Moore. 2016. Species and population diversity in Pacific salmon fisheries underpin indigenous food security. *Journal of Applied Ecology* 53:1489-1499.

Schindler, D.E., R. Hilborn, B. Chasco, C.P. Boatright, T.P. Quinn, L.A. Rogers, & M.S. Webster. 2010. Population diversity and the portfolio effect in an exploited species. *Nature* 465:609-612.

***3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

To address this issue, we recommend that the *timing* of the commercial harvest be managed in a manner that avoids disproportionately high exploitation rates for early run Copper River salmon stocks, potential adverse effects on overall population diversity of Copper River salmon, and potential adverse impacts on food security for salmon-dependent subsistence users. To be clear and *sincerely respectful of all user groups* that are reliant on Copper River salmon, the solution that we propose is about *timing* of harvest *not allocation* of harvest among user groups with legitimate needs.

Specifically, we recommend that the board revise the Copper River District Salmon Management Plan, 5 AAC 24.360 as follows, with revised text **underlined in bold**, regulatory text to be deleted fully capitalized and enclosed in brackets, and explanatory comments (if any) *in italics* and enclosed in parentheses:

(a) The department shall manage the Copper River District commercial salmon fishery to achieve a sustainable escapement goal of 360,000 – 750,000 sockeye salmon into the Copper River.
(b) The department shall manage the Copper River District commercial salmon fishery to achieve an inriver goal of salmon, as measured at the sonar counter near Miles Lake, based on the total of the following categories:

Spawning escapement
Lower end of sockeye salmon escapement goal
17,500 other salmon
Glennallen Subdistrict subsistence fishery 61,000 – 82,500 salmon
Chitina Subdistrict personal use fishery 100,000 – 150,000 salmon
Sport fishery 15,000 salmon
Hatchery brood (sockeye salmon) estimated annually
Hatchery surplus (sockeye salmon) estimated annually
TOTAL announced annually

(c) Repealed 4/24/2009.
(d) Repealed 3/30/2000.
(e) The department shall manage the Copper River District commercial salmon fishery to conserve and avoid disproportionate exploitation of early-run Copper River sockeye and king salmon stocks by comparing cumulative sonar passage and management objectives by date, as follows:

(1) After two commercial drift gillnet openings, the Copper River District shall not open to commercial drift gillnet fishing when cumulative sonar passage is less than 70 percent of the cumulative management objective for the same date.

4. Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

Prior to submission of this proposal, we consulted with the following groups and benefitted from the perspectives that they offered:

- ADF&G Division of Commercial Fisheries staff, Cordova & Anchorage
- ADF&G Division of Sport Fisheries staff, Glennallen & Fairbanks

- Copper Basin Fish and Game Advisory Committee
- Copper River / Prince William Sound Fish and Game Advisory Committee
- Wrangell-St. Elias National Park Subsistence Resource Commission

***Submitted By:**	Ben Bobowski, Superintendent, & Mark Miller, Ecologist Wrangell-St. Elias National Park & Preserve		
	Individual or Group		
Mile 106.8 Richardson Highway, P.O. Box 439	Copper Center, AK		99573-0439
***Address**	***City, State**		***ZIP Code**
	907-822-5234	Ben_Bobowski@nps.gov	
Home Phone	***Work Phone**	***Email**	

**Indicates a required field*

United States Department of the Interior

NATIONAL PARK SERVICE

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

IN REPLY REFER TO:

1.A.2

AUG 30 2024

Dr. Anne Marie Eich
Assistant Regional Administrator for Protected Resources
NOAA Fisheries, Alaska Region
Juneau, AK 99802-1668

Dear Dr. Eich:

As the delegated in-season manager of Federal subsistence fisheries in the Copper River drainage, I am writing to provide information relevant to the petition to list Gulf of Alaska (GOA) Chinook salmon as a threatened or endangered species under the Endangered Species Act (ESA). Of course, I do not want to see any GOA Chinook salmon populations listed as threatened or endangered, particularly for the Copper River. However, I understand that some GOA Chinook salmon populations are vulnerable, and this listing review may prove important to the viability and resiliency of the species.

It is important to note that there exist several fisheries for Copper River Chinook salmon. Chinook salmon are harvested by rural Alaskans who participate in Federal subsistence fisheries in the Copper River drainage and by user groups who participate in several other Copper River fisheries managed by the Alaska Department of Fish and Game (ADF&G). These ADF&G-managed fisheries include the Copper River District commercial fishery that occurs in marine waters at the mouth of the river, marine and inriver subsistence fisheries, and inriver sport and personal use fisheries. Data collected in association with management of Copper River fisheries have the potential to be rich sources of information relevant to NOAA Fisheries' consideration of the listing petition. The National Park Service (NPS) has a limited amount of primary data that include Federal subsistence harvest data and a dataset associated with the Tanada Creek weir. These data are included with my submission as Attachment 1. For our further analytical data needs, we benefit from numerous project partnerships and from long-term data sets generated by ADF&G and the Native Village of Eyak (NVE). I encourage you to reach out to ADF&G and NVE to identify and obtain additional data sets that may provide information relevant to the listing petition.

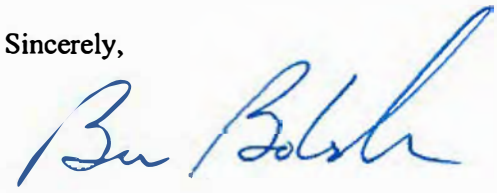
Also relevant to the listing petition, in recent years the Copper River drainage has experienced repeated low returns of spawning Chinook and sockeye salmon. Since 2003, there have been six years when estimates of Chinook salmon spawning escapement were lower than the escapement goal established by ADF&G. Inseason abundance indices for the 2024 Chinook run indicate that this may be the seventh such year since 2003 and the second such occurrence in the last four years. In June of this season, low estimates of returning Chinook salmon prompted ADF&G to take conservation actions affecting all State-

managed salmon fisheries in the Copper River drainage and to request that I take similar conservation actions in Federal subsistence fisheries (Attachment 2). I carefully considered this request, but ultimately decided *not* to restrict retention of Chinook salmon harvested in Federal subsistence fisheries due to the small number of Chinook that might have been saved by this action relative to the large number already harvested in the commercial fishery *and* the additional number harvested during my deliberations (see Attachment 3). For Copper River sockeye salmon, record-low returns occurred in 2018 and in 2020, the latter being a year in which ADF&G estimated that spawning escapement for wild Copper River sockeye salmon was just 1% above the 360,000-salmon lower bound of the escapement goal and spawning escapement for Copper River Chinook salmon was about 8% below the 24,000-salmon lower bound of the escapement goal[1].

While there are many factors that may be affecting Chinook salmon populations, both at sea and in freshwater, there are opportunities to adjust fishery management in a manner that benefits Copper River Chinook salmon. Specifically, adjustments to early season management of the commercial fishery may contribute to significant increases in Chinook salmon spawning escapement while simultaneously improving much-needed sockeye salmon spawning escapement in upper Copper River tributaries. Concerns of my own and of public stakeholders in upper Copper River communities about the status and management of Copper River sockeye and Chinook salmon populations led me to submit a regulatory proposal to the Alaska Board of Fisheries (Board) earlier this year (see proposal included with Attachment 2). The proposal summarizes my rationale and outlines a proposed change to State of Alaska regulations governing early-season management of the Copper River District commercial fishery. Although it is not yet certain, I anticipate that the Board will take up this proposal for consideration during the regulatory meeting to be held in Cordova in December of this year.

As stated above, I do not want to see any GOA Chinook salmon populations listed as threatened or endangered, particularly the Copper River population. With respect to the Copper River drainage, I believe that there may be appropriate management alternatives that would mitigate conservation risks and ensure a thriving future for Chinook salmon populations while also considering the interests of all user groups. With transparency and in support of any future management collaborations that may be inspired to avoid an ESA listing, I have cc'd key participants in management of fisheries that have the potential to affect the status of Copper River Chinook salmon.

Sincerely,



Ben Bobowski, Ph.D.
Superintendent

Attachments:

1. NPS Chinook salmon data
2. Letter from ADF&G Commissioner to Wrangell-St. Elias Superintendent, 6/26/2024
3. Letter response from Wrangell-St. Elias Superintendent to ADF&G Commissioner, 6/29/2024

cc: Sarah Creachbaum, Regional Director, NPS Region 11 (Alaska)

[1] Botz, J., C.W. Russell, J. Morella, and S. Haught. 2021. 2020 Prince William Sound area finfish management report. Alaska Department of Fish and Game, Fishery Management Report No. 21-18, Anchorage.

Jennifer Pederson Weinberger, Acting Associate Regional Director for Resources, NPS Region 11 (Alaska)
Anthony Christianson, Chair, Federal Subsistence Board
Doug Vincent-Lang, Commissioner, ADF&G
Angel Drobnica, Chair, North Pacific Fishery Management Council

NOAA Letter Attachment #1

Metadata: Explanatory information associated with Chinook salmon data provided by the National Park Service (NPS), Wrangell-St. Elias National Park and Preserve (WRST). For questions or additional information, contact Dave Sarafin, WRST Fisheries Biologist, at dave_sarafin@nps.gov or 907-822-7281

Worksheet	Data Label	Description and Details
Metadata	Federal Subsistence Harvest Records	Annually, WRST issues required subsistence fishing permits, receives harvest reports, and manually enters harvest data to a database managed by the Office of Subsistence Management (OSM, US Office of the Secretary, DOI). The data on these worksheets summarize historic records, based on user reports of harvest. The total reported harvest to date is then expanded to a harvest estimate based on the percentage of the permitted users that provided reports through that date (direct ratio expansion). Records are updated to include harvest reports as they are received. Note: OSM database records prior to 2011 contain discrepancies (and omissions) from those of WRST records. Harvest records prior to 2011 rely on WRST records.
1	Total Federal Subsistence Harvest in Upper Copper River	Historic record of Federal Subsistence Harvest in the Upper Copper River; all subdistricts combined. Note: The 2018 Federal subsistence Chinook salmon harvest numbers were significantly higher than any other year. Although a mix of factors may be associated with this increase, one primary driver was likely related to an extremely low number of sockeye salmon returning to the Copper River in the early season. This prompted conservative management by the State which provided extremely limited commercial fishery harvest opportunities in marine waters throughout much of the typical time period of high Chinook salmon harvest and may have resulted in more Chinook salmon migrating into the Copper River. Other associated factors may include: a coincidentally high number of Copper River Chinook salmon returning in 2018, fishers with State permits switching to Federal permits (if qualified) at times that State opportunities were closed, unknown effects of river conditions on catch efficiency, and low numbers of sockeye salmon in-river during the early season, prompting fishers to retain Chinook salmon that may have been otherwise released (some users prefer sockeye over Chinook salmon to meet their subsistence needs).
2	Federal Subsistence Harvest in Glennallen Subdistrict	Historic record of Federal Subsistence Harvest in the Glennallen Subdistrict. Note: See notes above relevant to 2018 increase in Chinook salmon harvests, which were documented most notably in the Glennallen Subdistrict.
3	Federal Subsistence Harvest in Chitina Subdistrict	Historic record of Federal Subsistence Harvest in the Chitina Subdistrict. Note: A significant change in management of the Federal Subsistence fishery in the Chitina Subdistrict took effect in 2018. In all prior years, the Federal management actions of this fishery mirrored that of the State Personal Use fishery. These actions delayed the season start date and only allowed Federal fishing at times that State users could fish. Beginning in 2018, the season began prior to that of the State and allowed continuous fishing throughout the season. New Federal subsistence fishing opportunities were created; resulting in increased harvest levels in the Chitina Subdistrict, with some users shifting harvest efforts from the Glennallen Subdistrict to the Chitina Subdistrict.
4	Federal Subsistence Harvest at Batzulnetas	Historic record of Federal Subsistence Harvest in the vicinity of Batzulnetas.
5	Tanada Creek Weir; Annual Chinook Count-Estimates	Historic count estimates of Chinook salmon migrating past NPS Tanada Creek Weir at Batzulnetas. Note: For all years, potential exists for errors in differentiating Chinook from sockeye salmon, primarily due to video image quality during low light or murky water conditions.
6	WRST Inventory Data of Chinook Salmon Presence	Data of Chinook salmon capture location during species inventory sampling. Includes results of a WRST parkwide inventory project (2002-2004) and subsequent records from opportunistic sampling.

NOAA Letter Attachment #1

Worksheet 1: Table 1. Federal Subsistence Fish Harvest in All Upper Copper River Fisheries(1) Expanded Harvest Estimates(2)

Year	Sockeye	Chinook	Coho	Steelhead/Rainbow Trout	Other Species	Total Harvest
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
2011	18,214	814	70	6	283	19,387
2012	17,297	410	93	45	113	17,958
2013	20,850	396	36	8	93	21,382
2014	25,659	456	97	14	57	26,284
2015	29,157	430	29	15	218	29,849
2016	21,106	465	52	6	406	22,035
2017	20,497	485	10	8	549	21,550
2018	20,634	2,763	31	4	45	23,476
2019	22,302	1,025	22	3	59	23,411
2020	16,337	837	26	7	60	17,266
2021	20,481	610	3	6	32	21,132
2022	17,489	994	45	16	60	18,603
2023	20,984	805	15	11	18	21,833
5-yr. Avg. 2019-2023	19,519	854	22	8	46	20,449
10-yr. Avg. 2014-2023	21,465	887	33	9	150	22,544
20-yr. Avg. 2004-2023	20,335	739	69	14	116	21,266

1 This table reflects entries to the online database from 2011 through 8/19/2024. 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.

NOAA Letter Attachment #1

Worksheet 2: Table 2. Glennallen Subdistrict Federal Reported and Expanded Subsistence Fishery Harvests

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

			Sockeye		Chinook		Coho		teelhead/Rainbow Trou		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	83.8	12,557	14,986	551	658	8	10	9	11	15	18	15,681
5-yr. Avg. 2019-2023	332	87	13,027	14,987	652	749	2	2	7	8	40	45	15,792
10-yr. Avg. 2014-2023	329	88	15,830	17,990	724	818	6	6	7	8	129	150	18,971
20-yr. Avg. 2004-2023	300	87	15,420	17,748	606	695	36	43	12	13	95	110	18,609

[1] This table reflects entries to the online database from 2011 through **8/19/2024**. 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.

NOAA Letter Attachment #1

Worksheet 3: Table 3. Chitina Subdistrict Federal Reported and Expanded Subsistence Fishery Harvests

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

			Sockeye		Chinook		Coho		teelhead/Rainbow Trou		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	88.8	5,138	5,788	131	148	5	6	0	0	0	0	5,941
5-yr. Avg. 2019-2023	193	90	3,952	4,402	94	105	18	20	0	0	0	0	4,528
10-yr. Avg. 2014-2023	158	89	2,969	3,323	62	69	24	27	1	1	1	1	3,421
20-yr. Avg. 2004-2023	123	88	2,162	2,445	39	43	23	26	1	1	1	1	2,516

[1] This table reflects entries to the online database from 2011 through **8/19/2024**. 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.

NOAA Letter Attachment #1

Worksheet 4: Table 4. Batzulnetas Federal Reported and Expanded Subsistence Fishery Harvests

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
5-yr. Avg. 2019-2023	1	100	130	130	0	0	0	0
10-yr. Avg. 2014-2023	2	100	216	216	1	1	1	1
10-yr. Avg. 2014-2023	2	96	139	142	0	0	1	1

[1] This table reflects entries to the online database from 2011 through **8/19/2024**. 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.

NOAA Letter Attachment #1

Worksheet 5: Table 2. NPS Tanada Creek Weir; Chinook salmon passage count estimates, 1997 to 2023

Year	Tanada Creek Chinook Salmon Count Estimate	Seasonal Notes
1997	2	
1998	2	
1999	N.A.	No weir operation
2000	N.A.	No weir operation
2001	16	
2002	5	
2003	2	
2004	0	
2005	1	
2006	4	
2007	7	
2008	137	A nearby tributary known to support Chinook salmon was reported to be blocked by channel erosion during 2008. This unusually high number may be associated in Chinook straying into Tanada Creek.
2009	9	
2010	16	
2011	1	
2012	2	
2013	0	
2014	5	
2015	0	
2016	2	
2017	4	
2018	0	
2019	N.A.	No weir operation
2020	N.A.	No weir operation
2021	N.A.	No weir operation
2022	7	
2023	8	
Average from 1997-2023 [8]	10	
Range from 1997-2023 [8]	0 - 137	

NOAA Letter Attachment #1

Worksheet 6: Ongoing Wrangell-St. Elias Freshwater Fish Inventory

SITE	LAT	LONG	DATE	FAMILY	SCIENTIFIC NAME	SPECIES	AGE	QUANTITY	ANADROMOUS	GEAR	REFERENCE	CREW
Anticipation Creek	61.3671556	-143.9636750	7/30/2001	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry	6	YES	E,MT	Freshwater inventory	Scotton, Veach
Chakina River	61.3288278	-143.1364750	7/28/2001	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry	19	YES	E	Freshwater inventory	Tilmont, Scotton, Simpson
Chokasna River	61.4552760	-143.7640700	8/9/2002	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry	13	YES	E	Freshwater inventory	Jones, McCormick
Gilahina River	61.4381940	-143.7188790	7/19/2002	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry, juv	3	YES	E, MT	Freshwater inventory	Jones, McCormick
Kame Stream Tributary	59.7904770	-140.0033880	5/24/2003	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	juv	1	YES	MT, gill, other	Freshwater inventory	Jones, McCormick, Mocnik
Lake Creek	61.3764167	-142.6432667	6/28/2011	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry	1	YES	E	Dan Creek, helicopter	Veach, Sarafin
Little Esker Stream	59.8787610	-139.7737100	5/28/2003	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	juv	9	YES	Visual, E, seine, gill, MT	Freshwater inventory	Jones, McCormick, Mocnik
Monahan Creek	61.1282990	-143.2586600	7/28/2002	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	juv	14	YES	E	Freshwater inventory	McCormick
Osar Stream	59.7301220	-140.1934330	5/20/2003	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	juv	7	YES	Gill, dip seine, MT, snorkel/SCUBA	Freshwater inventory	Jones, McCormick, Mocnik, Veach
Skull Creek	61.3273060	-143.6617840	7/29/2001	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	juv	14	YES	E, dip, visual, other	Freshwater inventory	Veach, Scotton
Sudden Stream	59.7881200	-139.9810800	5/22/2003	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	juv	11	YES	MT, gill	Freshwater inventory	Jones, McCormick, Mocnik, Veach
Tana River	61.2104667	-142.8351889	7/28/2001	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry	1	YES	E, gill	Freshwater inventory	Scotton, Tilmont, Veach, Willies
Tanada Creek	62.6139139	-143.7749889		Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	juv, fry, adult		YES	weir, visual	weir crew	Abraham, Boutte, Woodhams
Young Creek	61.2416080	-142.6484550	6/29/2011	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry	5	YES	E	Dan Creek, helicopter	Veach, Sarafin
Young Creek	61.3497230	-142.7279540	7/12/2002	Salmoniformes/ Salmonidae	*Oncorhynchus tshawytscha*	Chinook salmon	fry	1	YES	E, MT	Freshwater inventory	Jones, Veach, McCormick

Alaska Board of Fisheries
2024/2025 Meeting Cycle Proposal Book
Copper River Salmon (29 Proposals)

Subsistence (7 proposals)

PROPOSAL 44

5 AAC 01.620. Lawful gear and gear specifications.

Allow more than the legal limit of gillnet gear to be onboard a vessel used in the subsistence salmon fishery, as follows:

(j)

(4) A vessel engaged in subsistence gillnet may have extra gillnet gear on board the vessel.

What is the issue you would like the board to address and why? Interpretation that any vessel legally engaged in subsistence fishing cannot have extra gear on board to promote efficiency of harvest if the legal amount of gear being used is damaged during the subsistence activity . Being able to continue harvest having a spare amount on board does not harm anyone and is acknowledged by Subsistence regulations. further codifying this will more clearly define any misunderstanding by the public and ADFG to alleviate confusion and stress for subsistence participants.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Coordination with other subsistence users.

PROPOSED BY: Shawn Gilman (EF-F24-027)

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PROPOSAL 45

5 AAC 01.625. Waters closed to subsistence fishing.

Allow subsistence fishing for salmon in the Copper River inside closure area, as follows:

We recommend opening inside closure waters to subsistence fishing by adding new subsection 5 AAC 01.648 **(c)**:

5 AAC 01.648(c). Prince William Sound Subsistence Salmon Fisheries Management Plans

(c) Salmon may be taken for subsistence purposes in the inside closure area described in 5 AAC 24.350(1)(B) unless all other Copper River Chinook fisheries have first been restricted.

What is the issue you would like the board to address and why? The regulations set forth in 5 AAC 24.361 that restrict fishing in the regulatory closed waters specified in 5 AAC 24.350(1) (B) for the conservation of king salmon should only be applied to Commercial and Sport fisheries (5AAC 24.361 (b)-(c)). This area restriction has been applied to the subsistence fishery. Because the subsistence fishery is catch-limited (5 king salmon per household limit), an area restriction provides no conservation benefit; however, it places an unnecessary burden on subsistence users to fish farther out, especially those in river skiffs coming down rivers who are more suited to fishing more protected waters.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Native Village of Eyak Department of the Environment and Natural Resources staff, recommended by the Native Village of Eyak's Natural Resource Advisory Council and approved unanimously by Tribal Council.

PROPOSED BY: Native Village of Eyak (HQ-F24-099)
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PROPOSAL 46

5 AAC 01.630. Subsistence fishing permits.

Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery, as follows:

5 AAC 01.6xx new section

Subsistence harvest from the Copper River district must be reported within 7 days of harvest.

What is the issue you would like the board to address and why? Subsistence fishing in the lower Copper River District, which occurs at the mouth of the Copper River, can provide valuable in season run strength information as it is open every Saturday and on Mondays and Thursdays when the commercial fishery is closed. However, the reporting requirements for subsistence permits do not require reporting harvest until October 31. We believe that weekly reporting will not place an undue burden on participants in this fishery as it can be easily done at the local ADF&G office in Cordova, where all subsistence trips for the lower copper are based out of, or online. Additionally weekly reporting will increase the accuracy of reports and reduce the likelihood of participants harvesting more fish than their bag limit.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This Proposal was discussed and submitted by the Copper River/Prince William Sound AC

PROPOSED BY: Copper River/PWS Advisory Committee (HQ-F24-069)
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PROPOSAL 47

5 AAC 01.630. Subsistence fishing permits and 5 AAC 77.5XX Personal use fishing permits.

Require inseason reporting in subsistence and personal use fisheries, as follows:

(6) subsistence fishing reports must be completed on forms provided by the department**, or using an online app or phone call** and submitted to the department office from which the permit was issued [at a time specified by the department] **within 5 days of harvest** for each particular area and fishery.

(**6)** personal use fishing permits must be completed on forms provided by the department**, or using an online app or phone call** and submitted to the department office from which the permit was issued [at a time specified by the department] **within 5 days of harvest** for each particular area and fishery.

What is the issue you would like the board to address and why? Require In-Season reporting of Subsistence and Personal Use Salmon within 5 days of harvest using an online app or phone call to the department.

Currently, participants in both fisheries are not required to report their harvest until well after the close of the season. Both fisheries take a substantial number of salmon, especially in low abundance runs. It is imperative that managers have real time data to use their EO authority to close fisheries when the security of the resource demands it. It is time for all users of these valuable resources to be accountable.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This Proposal was discussed and developed by the Copper River/Prince William Sound Advisory Committee.

PROPOSED BY: Copper River/PWS Advisory Committee (HQ-F24-034)
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PROPOSAL 48

5 AAC 01.620. Lawful gear and gear specifications.

Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict, as follows:

Remove prohibition on subsistence guide services in the Glennallen subdistrict. Allow for subsistence guide services in the Glenallen subdistrict notwithstanding the prohibition

5 AAC 01.620 Lawful gear and gear specifications

[(L) SUBSISTENCE FISHING GUIDE SERVICES ARE PROHIBITED IN THE GLENNALLEN SUBDISTRICT. FOR THE PURPOSES OF THIS SUBSECTION,

(1) "SUBSISTENCE FISHING GUIDE SERVICES" MEANS ASSISTANCE, FOR COMPENSATION OR WITH THE INTENT TO RECEIVE COMPENSATION, TO A SUBSISTENCE FISHERMAN TO TAKE OR TO ATTEMPT TO TAKE FISH FROM A VESSEL BY ACCOMPANYING OR PHYSICALLY DIRECTING THE SUBSISTENCE FISHERMAN IN SUBSISTENCE FISHING ACTIVITIES DURING ANY PART OF A SUBSISTENCE FISHING TRIP;

(2) "COMPENSATION" MEANS DIRECT OR INDIRECT PAYMENT, REMUNERATION, AND OTHER BENEFITS RECEIVED IN RETURN FOR SERVICES, REGARDLESS OF THE SOURCE; IN THIS PARAGRAPH, "BENEFITS"

(A) INCLUDES

(I) WAGES AND OTHER EMPLOYMENT BENEFITS GIVEN DIRECTLY OR INDIRECTLY TO AN INDIVIDUAL OR ORGANIZATION; AND

(II) DUES, PAYMENTS, FEES, AND OTHER REMUNERATION GIVEN DIRECTLY OR INDIRECTLY TO A FISHING CLUB, BUSINESS, ORGANIZATION, OR INDIVIDUAL WHO PROVIDES SUBSISTENCE FISHING GUIDE SERVICES;

(B) DOES NOT INCLUDE REIMBURSEMENT FOR THE ACTUAL DAILY EXPENSES FOR FUEL, FOOD, OR BAIT.]

In order to assess the significance of guide service use, consideration should also be given to updating the Glennallen Subdistrict Subsistence Permit Harvest ticket to provide a check box on the permit to indicate if commercial services were used.

What is the issue you would like the board to address and why? A prohibition against subsistence guide services in the Glennallen Subdistrict was adopted at 2021 at the Prince William Sound/Upper Copper River Board of Fisheries meeting. This new regulation has unfairly and unnecessarily reduced opportunities for Alaskans and non-rural natives to harvest salmon for food in the Glennallen Subdistrict subsistence fishery. The prohibition has decreased opportunity for Alaskan households and increased competition for the extremely limited number of shore-based fishing sites that can be accessed via the public right of way.

The most reasonable access to this fishery for many subsistence users is by boat, but without an available transport or guide service, many subsistence users may find it very dangerous or are simply unable to participate and meet their subsistence needs. Many households rely on guides and transporters because the number of safe shore-based fishing sites is very limited; they are unwilling to attempt to wade into the dangerous river; they do not own a boat or are not comfortable driving a

boat on the Copper River; they do not own, or are unable to afford build, maintain or operate a fishwheel; they do not know someone with a fishwheel to use; or they do not have access to shoreline to place a fishwheel.

The prohibition was aimed at commercial services but it is subsistence users that have been harmed. Guide services merely provide a safe and cost-effective means of accessing fish for personal and family consumption. Significant use of these services in this subsistence fishery very clearly demonstrates their utility and value.

There is no sustainability issue with allowing subsistence users access to salmon resources with the assistance of a guide service. The prohibition was allocative away from the subsistence fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed collaboratively by a group of Glennallen subsistence fishery participants.

PROPOSED BY: Marlene Bertie Irneraucin (HQ-F24-054)
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PROPOSAL 49
5 AAC 01.620. Lawful Gear and Gear Specifications.
Prohibit transport services in the Glennallen Subdistrict, as follows:

5 AAC 01.620(l)(1)

(l) Subsistence fishing guide services are prohibited in the Glennallen Subdistrict. For the purposes of this subsection,

(1) "subsistence fishing guide services" means assistance, for compensation or with the intent to receive compensation, to a subsistence fisherman to take or to attempt to take fish from a vessel by accompanying or physically **transporting** [DIRECTING] the subsistence fisherman in subsistence fishing activities during any part of a subsistence fishing trip

What is the issue you would like the board to address and why? We want to clarify language to include the restriction of "transporting" subsistence fishermen in the Glennallen Subdistrict for subsistence fishing. Monetary compensation for transporting service should not exist in a subsistence fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Ahtna Intertribal Resource Commission (HQ-F24-108)
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PROPOSAL 50
5 AAC 1.620. Lawful gear and gear specifications. and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts, as follows:

5AAC 52.022 (a)(XX) **Electronics including chart-plotters, depth finders, fish finders, or any other device that may aid in locating fish, depth, or paths of travel while fishing may not be used to aid in the taking of fish from a boat in the Chitina and Glennallen Subdistricts.**

What is the issue you would like the board to address and why? "Fair chase" is an important concept that applies to hunting regulations. Many activities such as the use of drones, electronic calls, and even two-way radios are not allowed.

Electronics to aid in the taking of fish should be viewed in the same way.

We have seen increased fishing pressure when other places around the state such as the Kenai and the Yukon are closed. We are likely to see further increase as the Yukon has been closed for half a decade and the Kenai will see closures as well. Participation is only going to grow on the Copper River in years to come. The Copper River can't feed the whole State.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No.

PROPOSED BY: Kirk Wilson (HQ-F24-109)

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Salmon Management Plans (5 proposals)

PROPOSAL 51

5 AAC 24.360. Copper River District Salmon Management Plan.

Reduce commercial salmon fishing opportunity in the Copper River District, as follows:

To address this issue, we recommend that the *timing* of the commercial harvest be managed in a manner that avoids disproportionately high exploitation rates for early run Copper River salmon stocks, potential adverse effects on overall population diversity of Copper River salmon, and potential adverse impacts on food security for salmon-dependent subsistence users. To be clear and *sincerely respectful of all user groups* that are reliant on Copper River salmon, the solution that we propose is about *timing* of harvest *not allocation* of harvest among user groups with legitimate needs.

Specifically, we recommend that the board revise the Copper River District Salmon Management Plan, 5 AAC 24.360 as follows, with revised text **underlined in bold**, regulatory text to be deleted fully capitalized and enclosed in brackets, and explanatory comments (if any) *in italics* and enclosed in parentheses:

(a) The department shall manage the Copper River District commercial salmon fishery to achieve a sustainable escapement goal of 360,000 – 750,000 sockeye salmon into the Copper River.

(b) The department shall manage the Copper River District commercial salmon fishery to achieve an inriver goal of salmon, as measured at the sonar counter near Miles Lake, based on the total of the following categories:

Spawning escapement

Lower end of sockeye salmon escapement goal

17,500 other salmon

Glennallen Subdistrict subsistence fishery 61,000 – 82,500 salmon

Chitina Subdistrict personal use fishery 100,000 – 150,000 salmon

Sport fishery 15,000 salmon

Hatchery brood (sockeye salmon) estimated annually

Hatchery surplus (sockeye salmon) estimated annually

TOTAL announced annually

(c) Repealed 4/24/2009.

(d) Repealed 3/30/2000.

(e) The department shall manage the Copper River District commercial salmon fishery to conserve and avoid disproportionate exploitation of early-run Copper River sockeye and king salmon stocks by comparing cumulative sonar passage and management objectives by date, as follows:

(1) After two commercial drift gillnet openings, the Copper River District shall not open to commercial drift gillnet fishing when cumulative sonar passage is less than 70 percent of the cumulative management objective for the same date.

What is the issue you would like the board to address and why? The issue is that management of the Copper River District commercial fishery by the Alaska Department of Fish and Game (department) in five of the six most-recent years (2018-2023) resulted in disproportionately high harvest (exploitation) rates for early run Copper River salmon stocks. Without action by the board to mitigate this issue, persistent disproportionate exploitation of stocks with early migratory timing has the potential to diminish the overall population diversity of Copper River sockeye and king salmon while threatening food security for Copper River subsistence users, and particularly those who fish upstream of the Gakona River in the uppermost portion of the Glennallen Subdistrict. The 2023 season is most representative of this concern, when more than 387,000 salmon were harvested by the commercial fishery before cumulative salmon passage at Miles Lake had reached 50 percent of the department's objective for cumulative inriver passage. (Note that this estimate for the degree to which Miles Lake salmon passage was lagging behind cumulative commercial harvest and management objectives accounts for the fact that the sonar sensor on the south bank was not operational for a full 24-hr period until 5/31.) Disproportionately high early season harvest rates occurred to a lesser extent in 2021 and 2022, and also occurred in low-run years of 2018 and 2020 before low sonar counts triggered extended closures of the commercial fishery.

Management that results in a recurring pattern of disproportionately high exploitation rates for early run salmon stocks is inconsistent with two statewide fisheries management policies. These are the Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220), which specifies in part that "… conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority;" and the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222), which specifies in part that "… salmon escapement should be managed in a manner to maintain genetic and phenotypic characteristics of the stock by assuring appropriate geographic and temporal distribution of spawners …."

Management that has the potential to adversely affect population diversity of Copper River salmon would be contrary to the "portfolio-effect" principle, which holds that conservation of population diversity is an important means of enhancing the resilience of salmon populations and associated fisheries to changing environmental conditions (Hilborn et al. 2003, Schindler et al. 2010).

Management that results in disproportionately high harvest rates for early run stocks also may exacerbate known food-security concerns of upriver subsistence users. Because of their location in the watershed, subsistence users from headwater communities have access to the fewest spawning populations, some of which are characterized by early run timing. A preliminary National Park Service assessment of 2005-2021 harvest data found that year-to-year catch stability (one measure of food security, here estimated as interannual variability in catch-per-unit-effort) was lowest (interannual variability was highest) during this period for subsistence users who fished upstream of the Gakona River compared with downstream subsistence users who fished between the Chitina River bridge and the Gakona River. This pattern of low catch stability in the uppermost reach of the Copper River applied to participants in the state subsistence fishery and as well as the federal subsistence fishery and is consistent with findings for the Fraser River in Canada (Nesbitt and Moore 2016). Past research and Alaska Native traditional knowledge indicate that Copper River salmon stocks associated with headwater tributaries are among the earliest to enter the river. Since at least 2004 (board proposal 53 in 2005) and as recently as 2023 (RC019 submitted during the board's October 12-13, 2023 work session), subsistence users have repeatedly urged fisheries managers to allow more early run salmon to reach headwater spawning tributaries.

We considered an alternative solution to this issue, but rejected it in favor of this proposed solution after conferring with department staff from the Division of Commercial Fisheries and the Division of Sport Fisheries. The alternative solution would have required the department to (1) establish a program for post-season estimation and assessment of annual exploitation rates for distinct spawning stocks of Copper River sockeye and king salmon on the basis of genetic stock composition data and other appropriate information; (2) ensure, to the extent practicable, that exploitation does not place distinct stocks at elevated risk of extirpation; and (3) report assessment results to the board on a schedule that conforms to the board cycle. We rejected the genetics-based solution in favor of *this sonar-based solution, which is far simpler and less expensive to implement, thereby enabling immediate action during this board cycle*. Nevertheless, we believe that the use of genetic data to estimate stock-specific exploitation rates ultimately may be required for ensuring the long-term conservation of diversity of Copper River sockeye and king salmon populations and the resilience of these populations and dependent fisheries, livelihoods, and cultural traditions in the context of changing environmental conditions.

We will provide further analyses and context for the issue and additional justification for the proposed regulatory change in a letter submitted to the board following issuance of the proposal book.

References

Hilborn, R., T.P. Quinn, D.E. Schindler, & D.E. Rogers. 2003. Biocomplexity and fisheries sustainability. *Proceedings of the National Academy of Sciences* 100(11):6564-6568.

Nesbitt, H.K., and J.W. Moore. 2016. Species and population diversity in Pacific salmon fisheries underpin indigenous food security. *Journal of Applied Ecology* 53:1489-1499.

Schindler, D.E., R. Hilborn, B. Chasco, C.P. Boatright, T.P. Quinn, L.A. Rogers, & M.S. Webster. 2010. Population diversity and the portfolio effect in an exploited species. *Nature* 465:609-612

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Prior to submission of this proposal, we consulted with the following groups and benefitted from the perspectives that they offered: ADF&G Division of Commercial Fisheries staff, Cordova & Anchorage, ADF&G Division of Sport Fisheries staff, Glennallen & Fairbanks, Copper Basin Fish and Game Advisory Committee, Copper River / Prince William Sound Fish and Game Advisory Committee, and Wrangell-St. Elias National Park Subsistence Resource Commission

PROPOSED BY: Wrangell-St. Elias National Park and Preserve (HQ-F24-059)

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PROPOSAL 52

5 AAC 24.360. Copper River District Salmon Management Plan.

Reduce commercial salmon fishing opportunity in the Copper River District, as follows:

5 AAC 24.360 (x) **Allow two Copper River District commercial salmon fisheries 12-hour openers during the week of May 15th, then delay openers by two weeks or until a daily management objective for fish passage is met at the Miles Lake Sonar**.

What is the issue you would like the board to address and why? Protecting genetic diversity of salmon in the Copper River Watershed.

Traditional Ecological Knowledge (TEK) of Tribal citizens and accounts from local residents indicate the run timing of Copper River salmon has been delayed by about two weeks in recent years. These accounts are validated and quantified by various projects in the Copper River including radio

telemetry studies, genetics and bioenergetics studies, Miles Lake Sonar passage, Tanada Creek Weir passage, and harvest data from subsistence, commercial, and sport fisheries. Local managers and biologists have stated when the Copper River has a late ice-out, and when stream temperature remains cool late into the historical return time, salmon "mill" in the sound where they are susceptible to disproportionately high catch rates. Among these cohorts are king salmon and sockeye salmon destined for the furthest reaches of the Copper River. TEK is science, and it has long documented that the earliest returning salmon are those that spawn furthest upstream. This knowledge is being reconfirmed by a multitude of studies around Alaska and in the Copper River Basin.

Uneven targeting of these specific stocks decreases the diversity of the Copper River salmon genetic portfolio. On top of this, the Gakona to Slana reach of the Glennallen Subdistrict Subsistence Area has failed to meet Amounts Necessary for Subsistence (ANS) 17 of the past 19 years. These are the early returning fish. By delaying the PWS commercial fishery by two weeks or until a daily management objective is met at the Miles Lake Sonar, we are taking a step in the right direction in protecting the diversity of Copper River salmon. If salmon returns are earlier than that of recent years (a daily management objective is typically met around June 1-4), and a daily management objective is met before this two-week period, then we would expect these upriver stocks to return in numbers and the ensuing commercial fishery will not be disproportionately impacting Chinook and upriver sockeye stocks.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Ahtna Intertribal Fish and Wildlife Committee and Ahtna Tene Nene' jointly recommended this change to address Tribal concerns of sustainability of Chinook and upper Copper River sockeye stocks. This change in management will help prevent future restrictions and closures.

PROPOSED BY: AITRC Fish and Wildlife Committee (HQ-F24-102)

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PROPOSAL 53

5 AAC 24.360 Copper River District Management Plan.

Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met, as follows:

Allow commercial fisheries to open for the first two openers as a test fishery, then close until the Copper River cumulative management objective is met.

This will spread the commercial use throughout the season and allow earlier stock to go upstream.

What is the issue you would like the board to address and why? We have concerns of early run wild stocks reaching the upper Copper River tributaries.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We spoke with Wrangell St. Elias NPS and ADF&G about our concerns regarding Salmon in the Copper River and its tributaries.

PROPOSED BY: Copper Basin Advisory Committee (HQ-F24-113)

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PROPOSAL 54

5 AAC 24.361. Copper River King Salmon Management Plan.

Restrict use of Copper River District inside closure area during statistical weeks 20 and 21, as follows:

(b) In the commercial fishery, during the statistical weeks 20 and 21, the commissioner may not **close** [open] more than **three** [ONE] 12-hour fishing period**s** within the inside closure area of the Copper River District described in 5 AAC 24.350(1)(B).

What is the issue you would like the board to address and why? The 3 mandatory inside closures have been taken way too far by management. We no longer have an inside district fishery at all until July, even on years of Chinook abundance like 2023 we were shut out of our traditional fishing areas for far too long. This proposal would maintain the 3 inside closures currently in regulation but the change would require the opening of one inside district during a potential fourth fishing period during weeks 20 and 21, but only if there is an opener.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This idea is widely supported by the Cordova fleet.

PROPOSED BY: Kenneth B. Jones (HQ-F24-011)

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PROPOSAL 55

5 AAC 24.361. Copper River King Salmon Management Plan and

Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted, as follows:

If the commercial fishery is closed for king conservation measures on the inside waters during the commercial season for more than two consecutive non-mandatory inside closures then the commercial guide services in the Upper Copper River drainage will be limited to at least one conservation measure listed below for a period of no less than one week.

What is the issue you would like the board to address and why? The disconnect between conservation measures upriver and downriver. The commercial fisheries upriver and downriver should be tethered together in a way that promotes stewardship and shared conservation when necessary amongst commercial interest.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. In coordination with others in reviewing historical data.

PROPOSED BY: Shawn Gilman (EF-F24-026)

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Commercial (2 proposals)

PROPOSAL 56

5 AAC 24.XXX. New Section. Allow permit stacking by Prince William Sound commercial salmon drift gillnet permit holders, as follows:

5.AAC.24.3XX Requirements and specifications for use of 200 Fathoms of Drift Gillnet gear in Area E.

a) A CFEC permit holder who holds two Area E drift gillnet permits may operate 200Fathoms of gear.

b) Two Area E drift gillnet CFEC permit holders may concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear under this section.

c) When two Area E drift gillnet CFEC permits are fished from the same vessel and jointly operate drift gillnet gear under this section, the vessel must display its ADF&G permanent license plate number followed by the letter "D" to identify the vessel as a dual permit vessel. The letter "D" must be removed or covered when the vessel is operating with only one drift gillnet CFEC permit on board the vessel. The identification number and letters must be displayed (1) in letters and numerals 12 inches high with lines at least one inch wide: (2)in a color that contrasts with the background; (3) on both sides of the hull; and (4) in a manner that is plainly visible at all times when the vessel is being operated.

d) When two permit holders jointly operate gear under this section, each permit holder is responsible for ensuring that the entire unit of gear is operated in a lawful manner.

What is the issue you would like the board to address and why? Allow stacking of Copper River Drift permits like what has been successfully done in Bristol Bay and Cook Inlet.

The Copper River Drift Fleet has evolved into a more efficient fleet with improved hull and machinery and communication. This is not the same fleet that existed when limited entry was executed. The recent downturn of poor salmon runs, and poor prices has led to this fishery being barely financially viable. The average ex-vessel gross in 1990 was $44,000 and in 2022 was $29,000 adjusted for 1990 inflation. The ex-vessel gross is less than it was 32 years ago. Fuel prices, nets, and equipment have gone up dramatically in price the past 34 years while the overall gross has gone down.

The national average for a gallon of gas was $1.05 in 1990 while in 2021 it was $3.05.

The mean permit prices were $159,797 in 1990 meanwhile in 2023 the mean permit prices adjusted for 1990 inflation was $38,604. This is a complete collapse of permit values and the economic viability of this fishery.

This fleet is barely keeping its head above water, permit stacking would allow two things to happen.
1.) Allowing one vessel to operate two permits would be a fleet consolidation and allow this community fishery to be financially viable once again.
This is near a full participation fishery, allowing people to stack permits would reduce the amount of overall net in the water during commercial openers. This would reduce the overall harvesting efficiency of the fleet but would allow the remaining fishery participants more opportunity.
2.) Most importantly when comparing permit stacking to a buyback like was done in southeast seining permit stacking does not increase the difficulty for new entrants into the fishery. Permit stacking instead creates another path to ownership and experience in the fishery for deckhands who can buy a permit and stack it on the boat they crew on until they can afford to buy their own operation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This idea has been tossed around by members of the fleet as a potential solution to allowing more financial stability in this fishery.

PROPOSED BY: Darin Gilman (HQ-F24-002)
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PROPOSAL 57

5 AAC 24.XXX. New Section.

Allow dual permit operations in the Prince William sound commercial drift gillnet salmon fishery, as follows:

5.AAC.24.3XX Requirements and specifications for use of 200 Fathoms of Drift Gillnet gear in Area E

(a) Two Area E CFEC Drift Gillnet permit holders may concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear, and a person holding two Area E CFEC Drift Gillnet permits may operate up to 200 fathoms of drift gillnet gear, under this section. (b) When two Area E CFEC Drift Gillnet permit holders fish from the same vessel and jointly operate additional drift gillnet gear, and when a person holding two Area E CFEC Drift Gillnet permits operates additional drift gillnet gear, the vessel must display its ADF&G premanent license plate number followed by the letter "D" to identify the vessel as a dual permit vessel. The letter "D" must be removed or covered when the vessel is operating with only one Area E CFEC Drift Gillnet permit on board the vessel. The permanent license plate numbers and letters must be displayed in letters aInd numerals 12 inches high and at least one inch wide.

What is the issue you would like the board to address and why? Allow two Area E Drift Gillnet CFEC permit holders to concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear, and a person holding two Area E Drift Gillnet CFEC permits may operate up to 200 fathoms of drift gillnet gear under this new section. Often referred to as Permit Stacking.

This would be a fleet funded buyback program that would eliminate gear from the water, and would reduce boats in a now overcrowded fishery. For every nine boats that would stack permits it would be over a mile of gear out of the water. This would help with the up river escapement of Chinook and Sockeye on the Copper River, and would open up more fishing oppertunity for those participating in the fishery.

This proposal would also help in reducing conflicts between sport and commercial fishers in the Sound. With the increased number of Sport and Charter operators in the Sound, there have been an increased number of gear entanglements, and navigational issues. Less boats would mean less interactions.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have noted and experienced the succes of the Duel permit system in other fisheries in Alaska. I have also discussed this proposal with other members of the Area E Drift fleet.

PROPOSED BY: Fred Marinkovich (EF-F24-014)

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Personal Use (14 proposals)

PROPOSAL 58

5 AAC 24.361. Copper River King Salmon Management Plan.

Amend the *Copper River King Salmon Management Plan*, as follows:

5 AAC 24.361(d) is amended to read:

…

(d) In the Chitina Subdistrict personal use dipnet salmon fishery,

(1) the annual limit for king salmon is one fish;

(2) if the commissioner determines that additional conservation measures are necessary to achieve the escapement goals, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dipnet salmon fishery season and immediately reopen a season during which the retention of king salmon is prohibited**;** [.]

(3) if the commissioner projects that the upper bound of the escapement goal will be exceeded, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dipnet salmon fishery season and immediately reopen a season during which the king salmon annual limit per household permit is increased.

What is the issue you would like the board to address and why? In December 2021, the board adopted the current drainagewide sustainable escapement goal (SEG) of 21,000–31,000 king salmon. Copper River spawning escapement exceeded 31,000 king salmon in 2023. To mitigate exceeding the escapement goal, the only management actions available inriver are limited to liberalizing the sport fisheries, which have limited harvest potential and fishing is concentrated to only three tributaries. Allowing an increase in the king salmon annual household limit for the personal use fishery provides the department a management tool to attempt to stay within the SEG, if needed, across all upper Copper River and upper Chitina River stocks.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-167)

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PROPOSAL 59

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan, as follows:

5 AAC 77.591(e) is amended to read:

…

(e) The total annual limit for each personal use salmon fishing permit is **as follows;**

(1) 25 salmon for the head of household and 10 salmon for each dependent of the permit holder, except that only one king salmon may be retained per household[.]**;**

(2) if the commissioner projects that the upper bound of the Copper River drainage sockeye salmon sustainable escapement goal will be exceeded, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dip net salmon fishery season and immediately reopen a season during which the annual limit for the head of household is increased by XX sockeye salmon with no increase in the king salmon annual limit established in 5 AAC 77.591(e)(1), or an increase in the king salmon annual limit by conditions specified in 5 AAC 24.361(d).

What is the issue you would like the board to address and why? Since 2003, the Copper River sockeye salmon escapement goal has been exceeded 4 years, from 2012-2015. To mitigate exceeding the escapement goal, the only management actions available inriver are limited to liberalizing the sport fisheries, which have limited harvest potential and are concentrated to only two tributaries. Allowing an increase in the sockeye salmon annual household limit for the personal use fishery provides the department a management tool to attempt to stay within the SEG as well as distributing harvest across all upper Copper River and Chitina River stocks. The department will provide options and potential harvest from several scenarios of increased limits for the board to consider.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-168)

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PROPOSAL 60

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Modify the annual limit for the Chitina Subdistrict, as follows:

Section 5 AAC 77.591(e) The total annual limit for each personal use salmon fishing permit is **20** [25] salmon for the head of household and **5** [10] salmon for each dependent of the permit holder, except that only one king salmon may be retained per household.

What is the issue you would like the board to address and why? Copper River Personal Use Dip Net Salmon Allocation

The Chitina Subdistrict Personal Use Fishery has between 6,000 and 8,000 participants each year. The past three years have gone over the allocated 100,000 – 150,000 salmon limit with a three-year average of 163,989 (an underestimation, based on preliminary 2023 data). Lowering the bag limit by 5 fish per household member will ensure all Personal Use fishermen a reasonable opportunity to participate while accounting for increased interest in the Copper River fishery, and still remain below the 150,000 fish threshold. Closures around the state have brought and will bring more participants to this fishery. Ensuring the sustainability of Copper River salmon is the responsibility of all user groups including the Personal Use.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Shirley Smelcer (HQ-F24-101)
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PROPOSAL 61

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan

(e) The total annual limit for each personal use salmon fishing permit is [25] **15** salmon for the head of household and 10 salmon for each dependent of the permit holder, except that only one king salmon may be retained per household. **Supplemental permits for an additional 10 salmon for head of household will be allotted by EO authority if the in-river goal has a harvestable surplus.**

What is the issue you would like the board to address and why? The rationale to change the household limit to 25 salmon was in reflection of "like regulation" between the Upper Cook Inlet and Copper River drainages. However, the Copper River is a completely different watershed, and the historical PU bag limit was 15 for head of household compared to 25 salmon in the upper cook inlet fisheries. Currently the lower copper river subsistence fishery's bag limit is 15 salmon. The increased bag limit was a reallocation away from the Commercial fishery in (2013). The past few seasons, this increased allocation has hamstrung the lower river biologist's management due to less than stellar sockeye runs. The productivity of the Copper River differs from the Upper Cook Inlet systems; the bag limits initially reflected what the system could handle on normal run conditions.

The EO authority still allows for an increased bag limit when Copper River sockeye is in an above normal productivity cycle and there is a harvestable surplus.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Developed with other drift gillnetters in the fleet.

PROPOSED BY: Kalistrat Kuzmin (HQ-F24-076)
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PROPOSAL 62

5 AAC 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Allow inseason adjustment of the Copper River personal use maximum harvest level, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

(f) The maximum harvest level for the Chitina Subdistrict personal use salmon fishery is 100,000 - 150,000 salmon, not including any salmon in excess of the in-river goal or salmon taken after August 31.

IF THE COPPER RIVER DISTRICT COMMERCIAL SALMON FISHERY IS CLOSED FOR 13 OR MORE CONSECUTIVE DAYS, THE MAXIMUM HARVEST LEVEL IN THE CHITINA SUB DISTRICT IS REDUCED TO 50,000 SALMON

What is the issue you would like the board to address and why? The current condition of the copper river salmon stock on years of low abundance is dire. Ever growing non limited populations of upriver users are pulling out salmon at their most fragile and critical adult stage, during their late stages of migration and pre spawning. These pre spawning salmon must be protected on years of low abundance and all user groups need to share equitably in these conservation measures. In December 2017 the board of fish adopted proposal 18 which repealed and replaced regulatory language and has put the copper river salmon runs at risk ever since. The action taken by the board of fisheries to repeal what was known as the "shared burden" regulation resulted in the copper river nearly missing escapement during the 2018, and 2021 seasons, all despite unprecedented commercial closures. In 2020 despite achieving lower bound sonar goals the stock for the first time actually missed the in river escapement levels. During that year unprecedented commercial fishery closures also occurred, the lions share of the harvest in those low abundance seasons took place upriver, putting the runs at risk. Had this regulation been in place and enforced, the salmon runs would not have missed their escapement goals. It is essential that the burden of conservation is shared among all users not just placed solely on the historical commercial user which has been the case since 2017.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, other fisherman are overwhelmingly in support of this.

PROPOSED BY: Kenneth B. Jones (HQ-F24-009)

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PROPOSAL 63

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Amend the opening date of the Chitina Subdistrict personal use fishery, as follows:

5 AAC 77.591 (b) Salmon may be taken from June **21** [7] or **2 weeks after a daily management of fish passage is met at Miles Lake sonar** through September 30. The commissioner shall establish a preseason schedule, including fishing times, for the period June **21** [7] through August 31 based on daily projected sonar counts at the sonar counter located near Miles Lake. This abundance-based preseason schedule will distribute the harvest throughout the season. The commissioner **must** [MAY] close, by an emergency order effective June **21** [7], the Chitina Subdistrict personal use salmon fishing season and shall reopen the season, by emergency order, on or before June **21** [15] depending on the run strength and timing of the sockeye salmon run. Adjustments shall be made to the preseason schedule based on actual sonar counts compared to projected counts. If the actual sonar count at Miles Lake is more than the projected sonar count, the commissioner shall close, by emergency order, the season and immediately reopen it during which additional fishing times will be allowed. If the actual sonar count at Miles Lake is less than the projected sonar count, the

commissioner shall close, by emergency order, the season and immediately reopen it during which fishing times will be reduced by a corresponding amount of time.

What is the issue you would like the board to address and why? Protecting genetic diversity of salmon in the Copper River Watershed.

Currently, the Personal Use (PU) fishery in the Chitina Subdistrict (CSD) may begin as early as June 7. Traditional Ecological Knowledge (TEK) of Tribal citizens and accounts from local residents indicate the run timing of Copper River salmon has been delayed by two to three weeks in recent years, most likely due to changing environmental conditions i.e. late ice-out. Data from the Miles Lake Sonar and harvest analysis quantify and validate these accounts. The first fish to enter the river are typically Chinook and sockeye stocks that travel furthest upriver. With the PU fishery catching approximately 9.6% of the total sockeye and 4.4% of the Chinook run (most recent 5-year average), which is equivalent to approximately 164,000 total salmon reported (3-year average), the fishery disproportionately impacts Chinook and upriver sockeye stocks in the beginning of the season. Chinook have failed to meet escapement goals four of the past 10 years, even despite lowing the escapement goal from 24,000 to a range of 21,000-31,000 in 2021. Protecting Chinook and the genetic diversity of Copper River sockeye is a proactive step to ensure robust populations.

While PU participants are only allowed one Chinook per household, there are approximately 6,000 permits issued annually. In addition to high participation, there is also undocumented en route mortality as a result of fish handling during catch and release while dipnetting.

Based on radio telemetry studies, it is understood that salmon migrating past the Miles Lake Sonar take between 7 and 14 days (based on environmental factors i.e. streamflow) to reach the CSD where the PU fisheries occurs. By delaying the fishery by two weeks, or until 2 weeks after a daily management objective for fish passage is met at the Miles Lake Sonar (which is met on average between June 1 and 4), we will protect the diversity of Copper River salmon by not disproportionately impacting early returning genetic stocks.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Ahtna Intertribal Fish and Wildlife Committee and Ahtna Tene Nene' jointly recommended this change to address Tribal concerns of the sustainability of Chinook and upper Copper River sockeye stocks. This change in management will help prevent future restrictions and closures.

PROPOSED BY: AITRC Fish and Wildlife Committee (HQ-F24-104)
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PROPOSAL 64

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan

(a) Salmon may be taken in the Chitina Subdistrict only under the authority of a Chitina Subdistrict personal use salmon fishing permit. Only one Chitina Subdistrict personal use salmon fishing permit may be issued to a household per calendar year. A household may not be issued both a Copper River subsistence salmon fishing permit and a Chitina Subdistrict personal use salmon fishing permit. **A household may not be issued a Chitina Subdistrict personal use salmon fishing permit if the household has been issued an Upper Cook Inlet personal use salmon fishing permit in the same calendar year.**

What is the issue you would like the board to address and why? Personal Use bag limits reflect a user's household needs. However, the number of people participating in both Cook Inlet and Copper River PU fisheries is increasing. Four out of five PU Dip Net fisheries are operated under one permit and one bag limit in the Upper Cook Inlet PU Dip Net fisheries. We want to see a loophole closed to those taking advantage of multiple bag limits, by limiting a user to either a Chitina Sub district PU salmon fishing permit OR an Upper Cook Inlet PU salmon fishing permit in the same calendar year. **Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.**

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-112)
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PROPOSAL 65
5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Require a weekly permit and inseason reporting in the Chitina Subdistrict, as follows:

5 AAC 77.591 **(x)**

A participant must purchase a one-week Personal Use dipnet permit from Alaska Department of Fish & Game. Reporting is required within one week of the expiration of the permit. If harvest bag limit is not reached, additional permits may be obtained upon satisfying reporting requirements.

What is the issue you would like the board to address and why? In-season reporting for more accurate harvest assessment and for in-season decision making The Personal Use Fishery in the past three years has exceeded the allocated 100,000 – 150,000 limit with a three-year average of 163,989 (an underestimation, based on preliminary 2023 data). In-season reporting will help inform managers with responsible decision making

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No.

PROPOSED BY: Ahtna Tene Nene' (HQ-F24-110)
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PROPOSAL 66
5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal, as follows:

5 AAC 77.591 Add subsection (i) as written

(i) The department, in consultation with the hatchery operator, shall manage the Chitina Subdistrict Personal Use salmon fishing through restricting time and area by emergency order to achieve the Gulkana Brood Stock escapement goal.

What is the issue you would like the board to address and why? Prince William Sound Aquaculture has failed to achieve its broodstock goal for the Gulkana hatchery for the 8 most recent years, despite ample escapement passing the lower Copper River sonar. Many of the fish necessary to achieve broodstock are caught in the personal use fishery. We ask the board to require the department to manage to achieve this goal with input from PWSAC and grant them the necessary tools to do so. Full utilization of the Gulkana Hatchery will benefit all users over the long term. There is precedent set in other Prince William Sound fisheries in which hatchery operators and ADFG managers consult each other to restrict fishing time for broodstock escapements goals. One Example is in 5 AAC. 24.365 part (a).

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-113)
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PROPOSAL 67
5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict, as follows:

Add 5 AAC 77.591 (c) (1)
(c) Salmon may be taken only with dip nets.
(1) King salmon intended or required to be released may not be removed from the water.

What is the issue you would like the board to address and why? Removing king salmon from the water, that are intended to be released, is not allowed in sport fisheries. This is because it severely impedes the ability for king salmon to complete their life cycle. Removing king salmon should not be allowed in personal use fisheries.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-114)
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PROPOSAL 68
5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Prohibit dipnetting from a boat in the Chitina Subdistrict, as follows:

5 AAC 77.591 (c) Salmon may be taken only with dip nets **while not in a boat.**

What is the issue you would like the board to address and why? Reduce undue stress on Copper River king and sockeye salmon in the Chitina Subdistrict

Being able to target holding areas during times of high water that are not accessible from shore enhances the ability to catch king salmon. Based on ADF&G data, average king harvest per permit from 2019 to 2023 is 0.4 from boat and 0.3 from shore. About 6,000 Personal Use permits are issued each year. Only one king salmon can be retained annually per household. Fishing from a boat increases the number of kings caught and released. En route mortality of king salmon due to catch and release stress is not documented and could be contributing to decreased escapements. Copper River king salmon have failed to meet escapement goals 4 of the last 10 years. High stream flows have become more frequent in recent years, slowing the migration time by forcing fish to find refuge in eddies and pools until conditions are favorable for continued migration. Prior to use of boats for dipnetting, the salmon could seek this refuge in inaccessible areas to fishermen during times of high water. Now these areas are targeted.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Faye Ewan (HQ-F24-107)
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PROPOSAL 69

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Establish restrictions when dipnetting from a boat in the Chitina Subdistrict, as follows:

(C) Salmon may be taken only with dip nets. Salmon taken with a dipnet from a powerboat will be subject to more time and area restrictions to allow fish passage to return to a pattern that more closely resembles past practices in the fishery.

What is the issue you would like the board to address and why? The change in the nature, efficiency and scope of area not previously accessed by the Personal Use fishery in the Chitina Subsistrict. The use of power boats and especially the increase in charter power boats has allowed the take of fish holding on the bottom of the river during high water events and throughout the season in areas the were never before fished or exploited. This change in harvest method and area combined with increased commercialization is a drastic change that the Department has not fully recognized.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Coordinated with others watching the river activities.

PROPOSED BY: Shawn Gilman (EF-F24-028)
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PROPOSAL 70

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Extend the lower boundary of the Chitina Subdistrict, as follows:

The Chitina Dipnetters Assn. is requesting the BOF extend the lower boundary of the Chitina Personal Use Dipnet Fishery with new language in 5AAC 77.591(h) as defined below.

For the purpose of this section, the Chitina Subdistrict consists of all waters of the mainstream Copper River from the downstream edge of the Chitina-McCarthy Bridge downstream **to a line crossing the Copper River from a point just upstream of Canyon Creek on the east (lat. 61 deg 24'36.00"N – lon. 144 deg. 28'25.34"W) angling across the Copper River to the existing lower limit sign at Haley Creek** [to an east west line crossing the Copper River approximately 200 yds. Upstream of Haley Creek] This extension would, at its longest point, increase the drift area by approximately .4 of a mile or 694 yds. and give boat dipnetters a longer continuous drift, allowing more spacing between boats and alleviate the dangerous congestion of boats that occurs now. The revised language would still give law enforcement a straight line sight of the entire boundary line as viewed from Haley Creek. This small increase in size of the Chitina Sub-district is unlikely to result in increased harvests, since the fishery is managed by emergency order to stay within the allocation contained in the management plan and because Personal Use dipnetters are held to an annual bag limit and once met they are done for the year.

A map identifying the existing and proposed lower boundaries will be submitted to the BOF prior to the December 2024 Copper River/Prince William Sound meeting.

What is the issue you would like the board to address and why? In the last 12 years, drift dipnetting from both personal and guided boats has substantially increased as a method of harvesting salmon in the Chitina Personal Use Dipnet Fishery (CPUDF). This is in large part due to the very limited number of suitable sites available for shore based dipnetting. Because much of the CPUDF lies within the deep turbulent waters of Woods Canyon on the Copper River, productive areas to dip from boats are very limited. A favorable and high use area for drift dipnetting from boats lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the lower boundary of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free saving the loss of $150+ dipnets. This short drift area has

become the go-to spot for boat dipnetters and often becomes very congested with up to and over 15 boats drifting the same area. This congestion of boats in this short drift area has created a very dangerous navigation hazard for these boaters within the swift waters of the Copper River and boat accidents are inevitable.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. The Chitina Dipnetters Assn. and the Fairbanks Fish & Game Advisory Committee.

PROPOSED BY: The Chitina Dippnetters Assn. (HQ-F24-030)
****

PROPOSAL 71
5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.
Prohibit guiding in the Chitina Subdistrict, as follows:

5 AAC 01.620**(x) Fishing guide services are prohibited in the Copper River Chitina Subdistrict Personal Use Fishery.**

(x) "fishing guide services" means assistance, for compensation or with the intent to receive compensation, to a Personal Use Fishery participant to take or to attempt to take fish from a vessel by accompanying or physically directing the Personal Use Fishery participant in fishing activities during any part of a fishing trip

What is the issue you would like the board to address and why? Guided fishing from a boat is already not allowed in the Glennallen Subdistrict. We would like to expand this to apply to the Chitina Subdistrict Personal Use Fishery as well. The Personal Use Fishery in the past three years has exceeded the allocated 100,000 – 150,000 limit with a three-year average of 163,989 (an underestimation, based on preliminary 2023 data).

Guided fishing from a boat provides expertise and allows targeting of holding areas especially during times of high water that are not accessible from shore and enhances ability to catch king salmon and sockeye salmon. Based on ADF&G data, average king harvest per permit from 2019 to 2023 is 0.4 from boat and 0.3 from shore. About 6,000 to 8,000 Personal Use permits are issued each year, many of which use guide services. Only one king salmon can be retained annually per household. Fishing from a boat increases the number of kings caught and released. En route mortality of king salmon due to catch and release stress is not documented and could be contributing to decreased escapements. Copper River king salmon have failed to meet escapement goals 4 of the last 10 years.

High water levels have become more frequent in recent years, slowing the migration time by forcing fish to seek refuge in eddies and pools until conditions are favorable for continued migration. Prior to use of boats for dip netting and guided fishing trips, the salmon could seek this refuge in inaccessible areas to fishermen during times of high water. Now these areas are targeted by guides.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No.

PROPOSED BY: Ahtna Tene Nene' (HQ-F24-112)
****

AK Board of Game 2024: Regionwide & Multiple Units

PROPOSAL 1

5 AAC 92.015. Brown bear tag fee exemption.

Reauthorize the brown bear tag fee exemptions for the Central and Southwest Region Units as follows:

5AAC 92.015. Brown bear tag fee exemption

(a) A resident tag is not required for taking a brown bear in the following units:
(1) Unit 11;
(2) Units 13 and 16(A);
(3) Unit 16(B) and 17;
…
(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:
(A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;
(B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;
(C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;
(D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;
(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.
(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:
(1) Unit 9(B);
(2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);
(3) Unit 17;
…

What is the issue you would like the board to address and why? Brown bear tag fee exemptions must be reauthorized annually, or the fee will be automatically reinstated.

General Season Hunts: The board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these units provides greater opportunity to harvest brown bears by allowing opportunistic harvest.

In March 2011 the board also exempted brown bear tag fees for brown bear hunts near communities in Unit 9 to address public safety concerns in communities. Brown bears are abundant in Unit 9 and are managed primarily as a trophy species. Brown bears are frequently observed in communities where they destroy property in search of food or garbage and occasionally kill pets. The bear seasons and bag limits adopted in 2011 along with the elimination of the tag fee were intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of bears in defense of life or property.

Subsistence Brown Bear Hunts: The board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative from the general season hunts for hunters who take brown bears primarily for their meat.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-064)

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Note: This proposal addresses Game Management Units outside the scope of the Central Southwest Region meeting.

PROPOSAL 2

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

5 AAC 95.052. Discretionary permit hunt conditions and procedures.

Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal as follows.

Proposed changes to the following bear baiting seasons are:

Units 1A, 1B, 1C, 1D, 2-3, 5 ---------- Apr 15-June 15 / Sept 1-Oct 15
Units 6A, 6B, 6C ---------- Apr 15-June 15 / Aug 20-Oct 15
Unit 6D ---------- Apr 15-June 10 / Sept 10-Oct 15
Units 7, 9, 11-13, 14A & B, 14C Remainder, 15, 20 -------- Apr 15-June 30 / July 1 - Oct 15
Units 16, 17, 18, 19, 21, 22, 23, 24, 25---------- Apr 1 - Jun 30 / July 1 - Oct 15

With these changes in season dates and caribou herds dropping throughout the State of Alaska, the Department of Fish and Game can regulate / put in emergency orders if the bear population drops too low. In certain units of Alaska, it is harder for some hunters / subsistence users to gain access to their bear baiting sites and being able to hunt them due to the rivers not being safe to travel on.

What is the issue you would like the board to address and why? The Bethel Advisory Committee proposes to have two (2) bear baiting seasons in the State of Alaska in Units where bear baiting is legal. Hunters and subsistence users will have better opportunities to take bears during a two (2) season bear baiting. In certain units throughout the state, hunters & subsistence users may only have two (2) to three (3) weeks to get a legally take a take. There are nineteen (19) out of twenty-six (26) units in Alaska with a NO CLOSED SEASON for black bears.

Current State of Alaska Fish and Game Areas Open for Bear Baiting:
Units 1-(A, B, C), 2-3, 5, 6(A, B, C) ----------Apr 15 – Jun 15
Unit 6D* ----------Apr 15 – Jun 15
Units 1D, 7,9, 11-13, 14A & B, 14C Remainder, 15, 19(A, B, C, E) ---Apr 15 – Jun 30
19D remainder, 20, 21(A, B, E), 23, 24 A & B, 25(A, B, C)
Unit 16----------Jul 1–Oct 15 / Apr 15-Jun30
Unit 17----------Apr 15-May 31
Unit 18----------Apr 1 – Jun30
Unit 19D East Predator Control Area: Those portions of the Kuskokwim River Drainage within Unit 19D Upstream from Selatna River Drainage and the Black River Drainage 21C & D, 24C & D and 25D----------Aug 1-Sept 30 / Apr 15-Jun 30

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes.

PROPOSED BY: Bethel Fish & Game Advisory Committee (HQ-F24-016)
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Note: This proposal addresses Game Management Units outside the scope of the Central and Southwest Region meeting.

PROPOSAL 3

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 9, 11, 13, 14B, 16, and 17 as follows:

I would like the Board of Game to allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 7, 9, 11-13, 14A, 14B, 15-21, 23-25, 26B, and 26C, during applicable seasons (same units as airborne). This allows an easily enforceable regulation for law enforcement with concise purpose of use and time when these cameras can be used.

What is the issue you would like the board to address and why? Currently hunters are not allowed to use any camera or other sensory device that can send messages through wireless communication. This includes cellular game cameras over bear bait. These were prohibited with the assumption that this would give an unfair advantage to hunters, yet despite when the hunter gets a photo, he would still have to travel to hunt his bait station often requiring hours of travel

that is not feasible in a reasonable amount of time or the day of. In many units, hunters are already allowed to hunt bears same day airborne as long as they are 300 feet from a plane, which gives a higher advantage than a wireless cell camera could for most hunters.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Caleb Martin (EG-F24-037)

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PROPOSAL 4

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Establish general season, archery only sheep hunts in Units 9, 11, 13, 14A, and 14B as follows:

Units 9, 11, 13, 14A, 14B (or limited to a specific combination of areas if managers see fit),
HT sheep areas only: 1 ram with full curl horn or larger by bow and arrow only,
HT, August 6 - August 9. (Or July 21-31 if an earlier date is preferred)

What is the issue you would like the board to address and why? For many years hunters in Alaska have requested an opportunity to hunt for sheep with archery equipment but there still remains no season or area (aside from the highly sought after DS140/141 draw tags) during which hunters can pursue sheep with a bow and arrow without the pressure and danger associated with hunting during the general rifle season. The author of this proposal has personally been shot at while stalking by rifle hunters who weren't aware of his presence and other anecdotes exist of hunters finding themselves near sheep that others are shooting from far away. The increased popularity of long-range shooting for mountain animals has increased this hazard. (A recent ADF&G survey study on goat harvest in Southeast Alaska showed that about 23% of shots were over 300 yards and some were out to 600!)

In addition, there is an ever-increasing population of hunters who are interested in pursuing sheep with a bow and arrow but who did not feel that there is adequate opportunity to do so without competing directly with rifle hunters especially in "walk-in" areas but also in areas where most hunter fly.

Currently there is a four-day gap between the youth season and the general season in most areas. In the past some opposition to sheep season proposals raised concerns that it would interfere with the youth season, but this would remove that concern because it takes place after the youth season is over. There have also been concerns about archery hunters displacing sheep but many studies from sheep biologists in Canada and Alaska have shown that rams do not move far from their established areas in the pre-rut period even when disturbed. In the worst case the rams spooked by bow hunters might move a few miles but often they just go into nearby escape terrain where they are safe from bowhunters. I have witnessed this behavior many times when bowhunting sheep in multiple mountain ranges of Alaska and even after spooking them, they almost always remain in sight or are easily relocated in an adjacent area. The displacement of sheep by bowhunters in an

early season is simply not a legitimate concern and any skilled mountain hunter will attest to being able to easily relocate sheep that were recently disturbed by a hunter.

The success rates of archery hunting for sheep are also very low so the effect on harvest will be essentially negligible but the increased opportunity will be greatly appreciated by all sheep hunters who are willing to accept some added challenge.

Further concerns have been raised in the past in regard to an early sheep season because it would allow for aerial scouting during season because of the scouting being allowed up to August 10. Please see the other proposal by this author which hopes to establish the "no aerial scouting" period to start on August 1 instead of August 10.

Also, as a matter of precedent, ADF&G has added early archery moose seasons to some of the areas up for proposals this year, including Units 14A and 14B. This has worked well and I'm not aware of any complaints that early season archery moose hunters have had any adverse effects on rifle hunters using the same areas later in the season.

If interference with other hunters was a significant concern, another option could be to move this hunt to July 20th (or some other date at the pleasure of the board), ending by August 1, so as not to interfere (as concerns were raised in the past) with the youth season and to still allow a small period before the general rifle season.

It is also important to note that archery seasons and areas have become very popular and well accepted throughout north America but currently, aside from draw hunts and a very small area in the Dalton Highway Corridor, there is no archery season or area for those wishing to pursue sheep with bow and arrow. Having bow hunted for many years in Alaska, I can attest that having a season, even just a few days, would provide a great amount of enjoyment and adventure for many hunters with essentially zero negative impact on other hunters or the sheep population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I have discussed this idea with several biologists at ADF&G and all of them felt that this proposal would have no adverse effect on our declining sheep population but would increase hunting opportunity,

PROPOSED BY: Paul Forward (EG-F24-097)

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AK Board of Game 2024: Glennallen – Units 11 & 13

PROPOSAL 39

5 AAC 92.108. Identified big game prey populations and objectives.

Reduce population and harvest objectives for moose in Unit 13B as follows:

Population	Finding	Population Objective	Harvest Objective
…			
Moose			
…			
GMU 13B	Positive	**4,500–5,500** [5,300–6,300]	**200–400** [310–620]
….			

What is the issue you would like the board to address and why? Subunit 13B is included in an active intensive management program to benefit moose in Unit 13. A long history of harvest and population monitoring has demonstrated that moose abundance and harvest have peaked twice since 1967 (Figure 39-1, Figure 39-2).

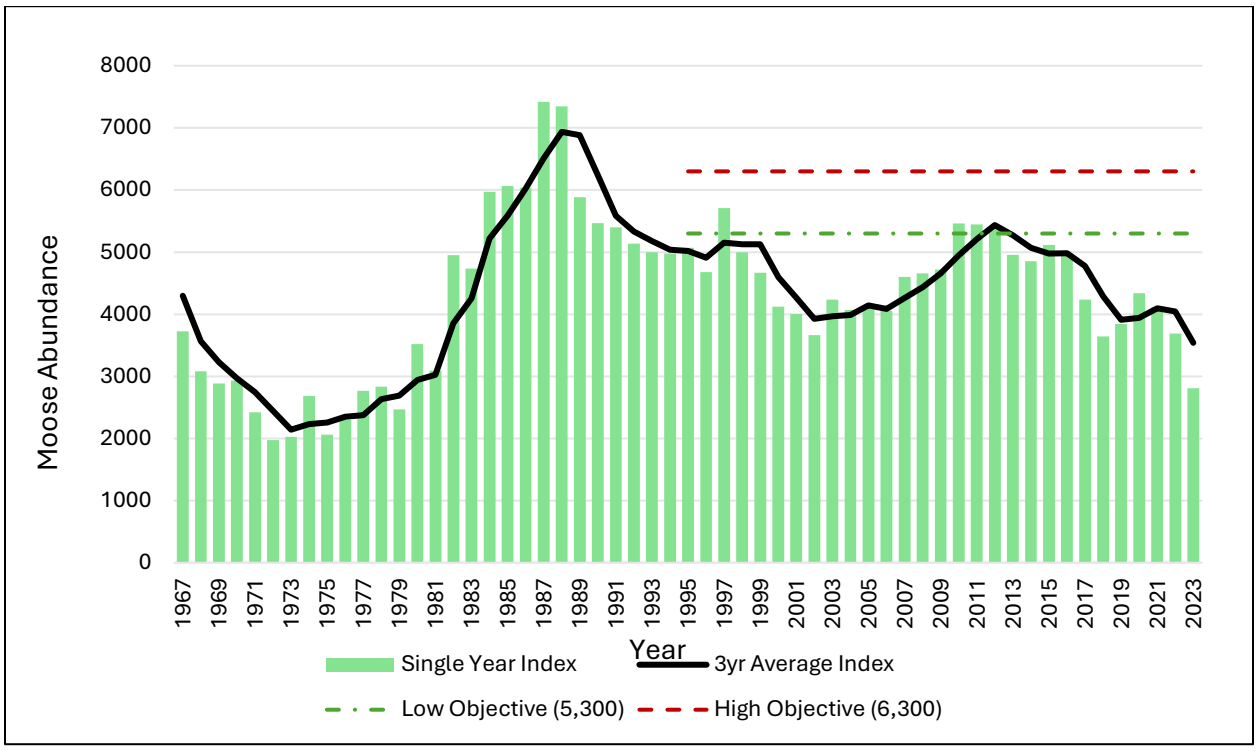

Figure 39-1. Moose abundance index in Unit 13B, RY1967–2023.

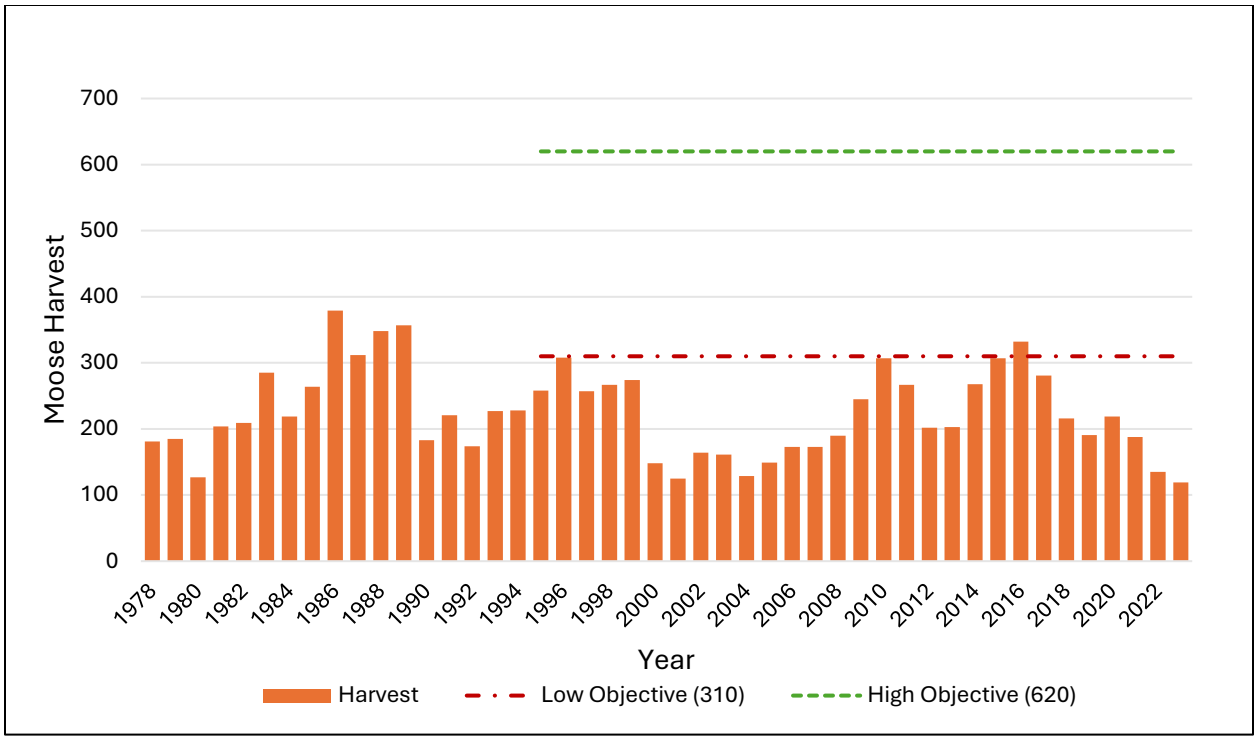

Figure 39-2. Moose harvest in Unit 13B, RY1978–2023.

The department proposes a more biologically appropriate productive and sustainable objective would be an abundance of 4,500–5,500 moose with 200–400 moose for annual harvest, based on historic peaks and valleys for these metrics. This represents a harvest rate of roughly 4.3%–6.8% and includes the long-term average of 225 harvested, with a historic range of 125–379.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-081)

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PROPOSAL 40

5 AAC 92.108. Identified big game prey populations and objectives.

Change the population objective for moose in Unit 13C as follows:

Changing the moose abundance objective in Unit 13C.

What is the issue you would like the board to address and why? The current is 2,000-3,000, and our recommendation is to change it to 2,500-3,250.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes; with the public at our local advisory committee, and the ADF&G staff.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee (HQ-F24-001)

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PROPOSAL 41

5 AAC 92.108 Identified big game prey populations and objectives.

Reduce harvest objectives for moose in Unit 13C as follows:

Population	Finding	Population Objective	Harvest Objective
…			
Moose			
…			
GMU 13C	Positive	2,000–3,000	**80–200** [155–350]
….			

What is the issue you would like the board to address and why? Unit 13C is included in an active intensive management program for moose in Unit 13. A long history of harvest and population monitoring has shown that moose abundance has gone through three peaks since 1967 (Figure 41-1).

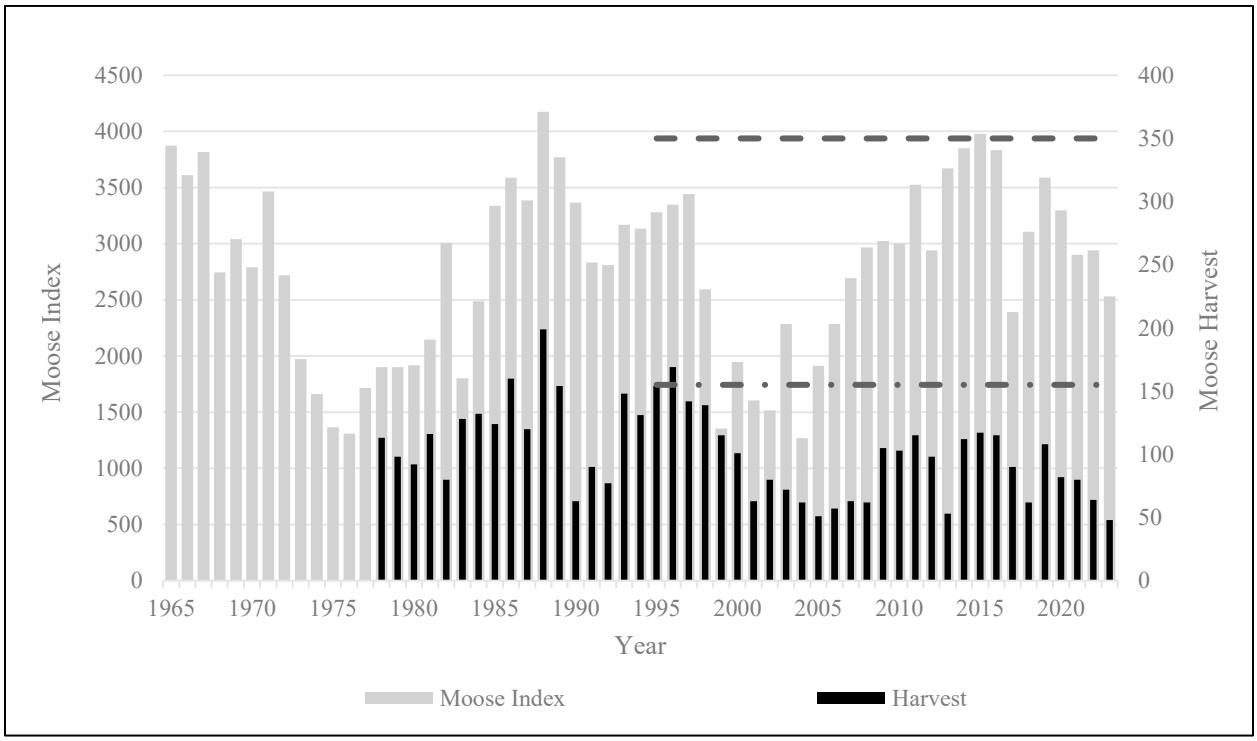

Figure 41-1. Moose abundance index and harvest in Unit13C, RY1965–2023.

Reported harvest numbers are available since 1978, but in those 46 years the minimum harvest objective has only been achieved three single years. The current harvest objectives for Unit 13C are not attainable. Furthermore, the current harvest objectives of 155–350 moose represents roughly 7.2%–10.4% of the current moose population objectives, which is not a sustainable goal. The proposed new harvest objectives for Unit 13C is 80–200 moose, which includes the long-term (approximately 65 year) average of 102 moose and also reflects harvest levels reported in recent years when moose abundance was at a historically more sustainable level. The historic range (1965-2022) of moose harvest in Unit 13C is 51–199. The new harvest objectives would represent a harvest rate of roughly 3.8%–6.3%.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-082)

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PROPOSAL 42

5 AAC 92.108. Identified big game prey populations and objectives.

Reduce harvest objectives for moose in Unit 13E as follow**s:**

Population	Finding	Population Objective	Harvest Objective
…			
Moose			
…			
GMU 13(E)	Positive	5,000–6,000	**150–300** [300–600]
….			

What is the issue you would like the board to address and why? Unit 13E is included in an active intensive management program to benefit moose in Unit 13. A more than 40-year history of harvest monitoring demonstrates that moose harvest in Unit 13E has peaked twice since 1978 which coincide with peaks in moose abundance (Figure 42-1). The only year in which the lower harvest objective was achieved was in 1988, when 303 moose were harvested. The historic range (1978-2023) of harvest in Unit 13E is 86–303 moose. The current harvest objectives for Unit 13E are not attainable as demonstrated by the harvest history of the herd. The proposed harvest objectives for Unit 13E is 150–300 moose, and is based on the long-term (approx. 45 year) average of 176 moose. These new harvest objectives would represent a roughly 2.9%–4.8% harvest rate, which is reasonable for an area in which cow harvest cannot reliably be obtained due to regulatory frameworks.

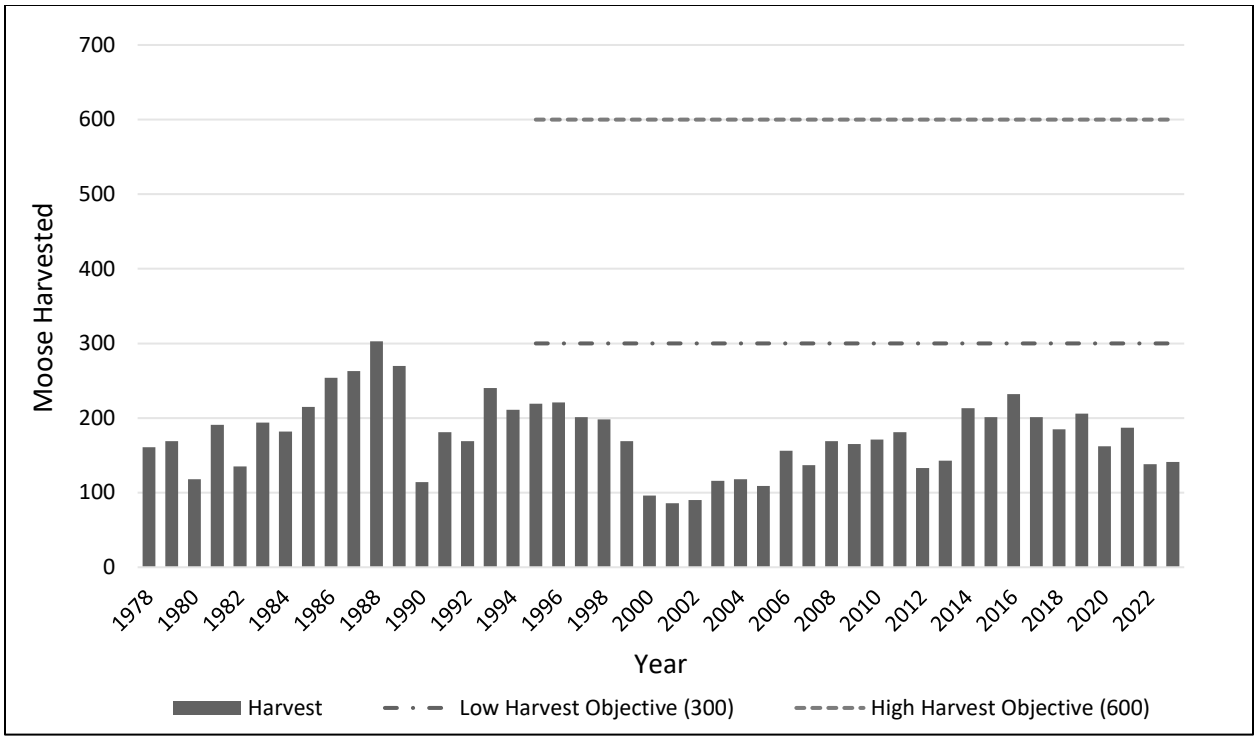

Figure 42-1. Moose harvest and objectives in Unit 13E, RY1978–2023.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-078)

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PROPOSAL 43

5 AAC 85.045. Hunting seasons and bag limits for moose.

Establish an antlerless moose season in Unit 13A as follows:

Units and Bag Limits (11)	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 13 1 moose per regulatory year, only as follows: …		

1 antlerless moose by drawing permit only in Unit 13(A); up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or	**Oct. 1–Oct. 31 (General hunt only)**	**No open season**

….

What is the issue you would like the board to address and why? Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use requires harvest of cow moose to utilize additional surplus moose on the landscape and prevent moose populations from exceeding the carrying capacity of the land. To maintain moose populations within their appropriate population and sex ratio objectives while also providing adequate opportunity to meet harvest objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities. Unit 13A has a history of successful sustainable cow harvest incorporated into the harvest strategy with relatively high overall productivity and harvest rate for the population since 2012 (Table 43-1). This antlerless hunt opportunity was not reauthorized by local Advisory Committees in 2024 despite moose abundance being within objectives.

There is a positive customary and traditional use finding for moose in all of Unit 13, and an amount reasonably necessary for subsistence uses of 300–600 moose. After deliberating a Unit 13 proposal during the 2015 Board of Game meeting, submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough permits to allow the harvest of up to one percent of the cow population when the moose population is above the midpoint of the population objective for the subunit. The hunt area for the antlerless hunt was restricted to the western half of Unit 13A (west of Lake Louise Road), which maintains higher moose densities than the eastern half of Unit 13A.

Table 43-1. Antlerless moose permits and total harvest in Unit 13A, Regulatory Year (RY)12–24.

		DM325 Harvest		Other Harvest[a]				
Regulatory Year	DM325 Permits	Cows	Bulls	Cows	Bulls	Total Harvest	1% of Estimated Cows in 13A	Estimated Overall Harvest Rate
2012	10	4	0	3	230	237	29	5%
2013	10	2	0	1	260	263	30	6%
2014	10	4	3	0	255	262	27	6%
2015	10	7	0	1	333	341	30	7%
2016	10	5	0	3	311	319	28	7%
2017	10	6	2	4	318	330	23	7%
2018	10	7	0	0	246	253	28	6%
2019	10	8	2	0	271	281	27	7%
2020	20	16	0	1	272	289	25	7%

2021	25	22	0	1	264	287	32	7%
2022	25	19	1	3	235	258	24	6%
2023[c]	20	14	0	5	148	167[b]	27	4%
2024[d]	20	-	-	-	-	-	-	-

[a] Other harvest includes ceremonial harvest.
[b] Moose hunter numbers declined with the closure of caribou seasons in Unit 13 and hunters reported unusually difficult hunting conditions, including stormy weather and late leaf drop.
[c] Data has not been finalized for RY23.
[d] Permits were announced for RY24 prior to Advisory Committee votes.

The current population objective for Unit 13A is 3,500–4,200 moose with a harvest objective of 210–420 moose, which represents a harvest rate of roughly 5.7%–9%. Moose abundance indices are derived from annual minimum trend counts, which can vary from year to year even when a population is stable (Figure 43-1). To address this variation the 3-year average moose abundance index is typically used to determine subunit status in relation to the midpoint of the population objectives (Figure 43-2). Moose abundance in 13A peaked near historic highs in 2013, 2015, and 2021 and has since declined to more reasonable and productive levels. A combination of intermittent wolf control and cow harvest has recently allowed the 13A moose population to stabilize at a more reasonable level within objectives. The goal is to maintain this stabilization and provide more moose in freezers, which requires cow harvest. Cow moose hunts should be implemented when a population is within objectives, with the goal of stabilizing the population before a population reaches or exceeds the higher objective because of density dependence concerns.

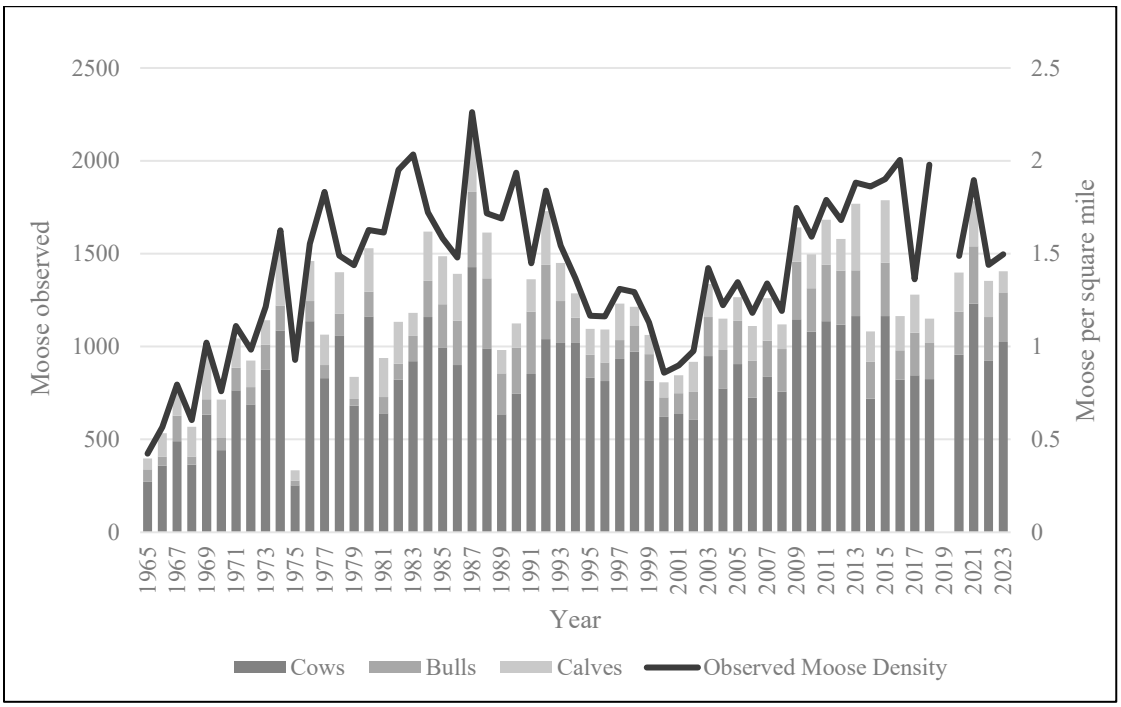

Figure 43-1. Moose minimum counts and observed density in western Unit 13A, RY1965–2023. In 1975, 1977, 1979, 1981–83, 1989–90, 2014, 2016, and 2018 only one out of two count areas were surveyed.

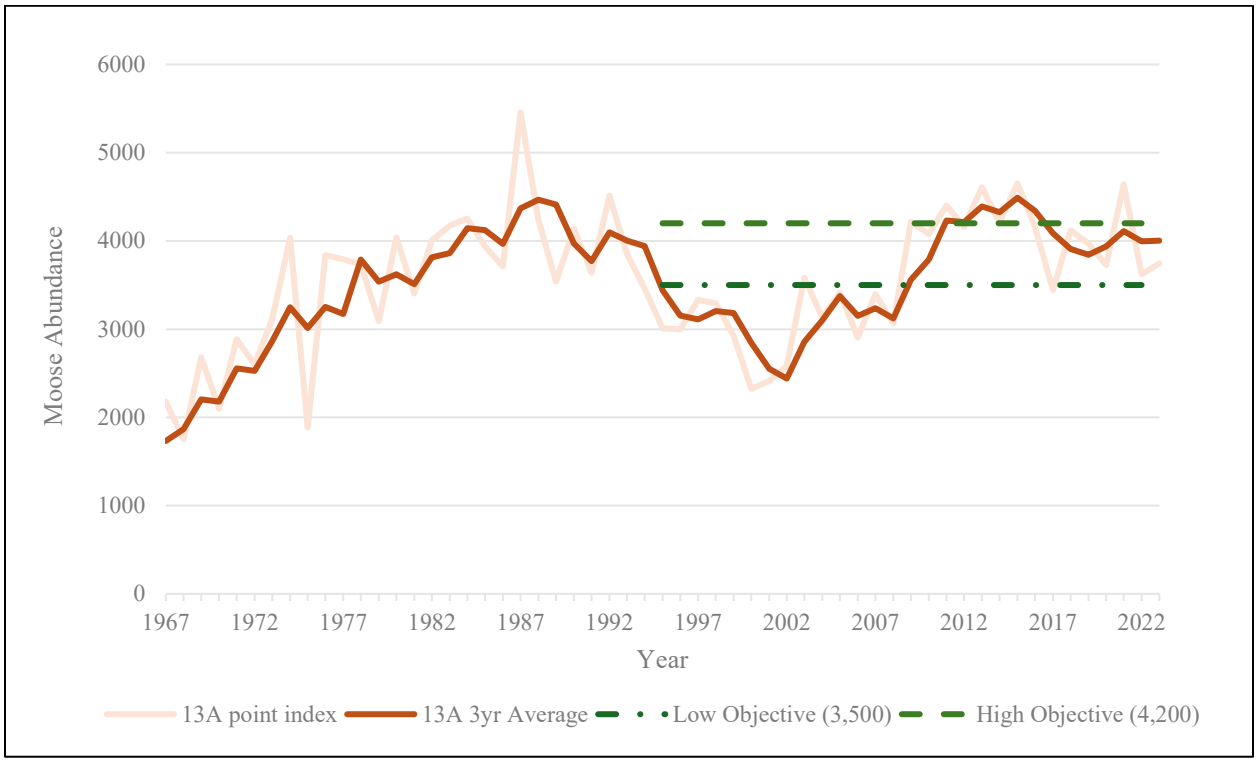

Figure 43-2. Moose population index in Unit 13A, RY1967–2023.

If antlerless moose hunting opportunities are not available in Unit 13A, the intensive management program and objectives will likely need to be reduced to maintain the moose population within a population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-079)

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PROPOSAL 44

5 AAC 85.045. Hunting seasons and bag limits for moose.

Establish an antlerless moose season in Unit 13C as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(11)		

Unit 13
1 moose per regulatory year,

only as follows:
…

1 antlerless moose by drawing permit only in Unit 13(C); up to 100 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or	**Oct. 1–Oct. 31 (General hunt only)**	**No open season**

….

What is the issue you would like the board to address and why? Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human consumptive use when populations are doing well requires harvest of cow moose to utilize additional surplus moose on the landscape and prevent moose populations from reaching or exceeding the carrying capacity of the land. To maintain moose populations within their appropriate population and sex ratio objectives while also providing adequate opportunity to meet harvest objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities.

There is a positive customary and traditional use finding for moose in all of Unit 13, and an amount reasonably necessary for subsistence of 300–600 moose. The current population abundance objective for Unit 13C is 2,000–3,000 moose. Moose minimum counts in Unit 13C were near record highs from 2013 to 2019; that level of abundance has not been seen in Unit 13C since the late 1980s and late 1990s (Figure 44-1). With no cow harvest opportunity, the population peaked with an abundance index of nearly 4,000 moose in 2015, nearly 3,600 moose in 2019, and has since declined to just over 2,500 moose in 2023, suggesting that Unit 13C cannot sustain those high levels of moose abundance over the long-term. The calf-to-cow ratio in Unit 13C has shown a declining trend over the past decade, which suggests the population may have become less productive as it approached or exceeded the carrying capacity of the area. Wolf control has been suspended in Unit 13C since 2019 due to the high numbers of moose and lack of cow harvest opportunity.

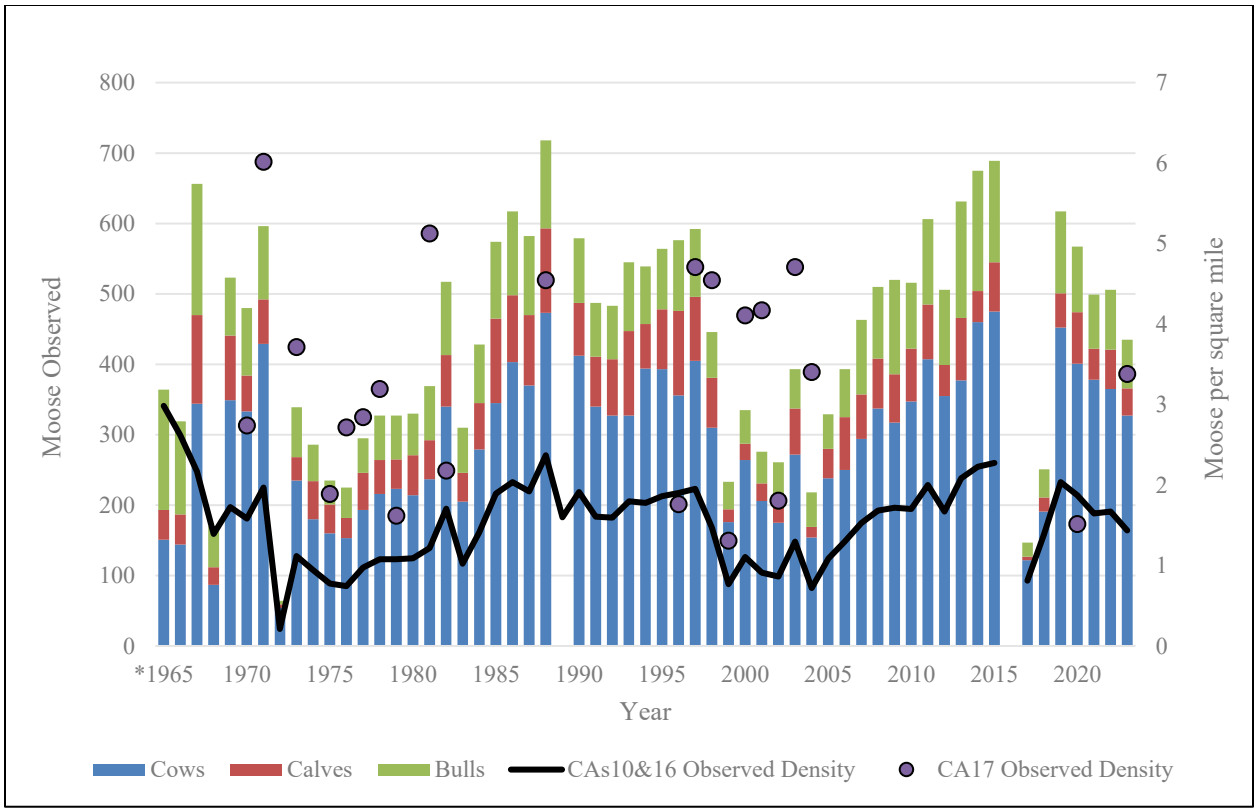

Figure 44-1. Moose minimum counts and observed densities in Unit 13C, RY65–23. In 1965, 1966, 1968, 2017, and 2018 only one count area was completed.

After considering a Unit 13 proposal during the 2015 Board of Game meeting, which was submitted by the public to increase the number of cow permits issued annually, the board directed the department to issue enough permits to allow the harvest of up to one percent of the cow population when the moose population is above the midpoint of the population objective for the subunit.

Recent composition surveys indicate that the bull-to-cow ratio has been hovering at or below 25 bulls per 100 cows, (the current objective for Unit 13C) indicating that there are no additional bulls available for harvest. Stabilizing the population within the objectives will allow for a more productive population, producing more bulls as well as cows for an increase in the overall harvestable surplus. Population growth cannot be controlled through bull harvest only. Waiting to implement cow harvest after a population has peaked and beginning to decline is short-sighted and ineffective. The tool needs to be available when a population is growing toward the higher objective with the understanding that hunting permits will not be issued when the population is below the midpoint of the objectives.

If antlerless moose hunting opportunities are not available in Unit 13C, the intensive management program and objectives will likely need to be reduced to maintain the moose population within a

population size range that does not result in nutritional limitations for the moose and to achieve the harvest objectives recommended by the public, advisory committees, and the board.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-080)
****

PROPOSAL 45

5 AAC 85.045. Hunting seasons and bag limits for moose.

Add a five-day archery only season for hunting moose in Unit 13 as follows:

I would like to see the Board of Game take additional steps to maximize the Unit 13 moose hunting opportunity while preserving the resource.

Add a 5-day archery only season in Unit 13.
"One bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least one side by bow and arrow only" HT, August 27-31.

What is the issue you would like the board to address and why? I am not a fan of regulations that provide certain user groups exclusive access to the detriment of other user groups. I do however support adding weapon restricted seasons in addition to an existing general harvest season, when it can be used to increase the overall number of available days afield without causing a detrimental impact to the resource. Units 14 and 16 already have successfully managed archery only seasons and this would bring Unit 13 more in line with those neighboring units.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No but, by submitting this I hope to get feedback from ADF&G biologists on its viability.

PROPOSED BY: Jon Freeman (HQ-F24-029)
****

PROPOSAL 46

5 AAC 85.045. Hunting seasons and bag limits for moose.

Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions as follows:

Proposed Language:

Alaska residents only:

Unit 13 Moose

August 15-27; Bull (by registration permit only).

When the harvest is projected to reach 100 animals, antler requirements of spike/fork or 50-inch antlers with at least 4 or more brow tines on one side will take immediate effect.

This hunt is closed to the use of motorized transport or pack animals, (except in portions of Unit 13 along the Parks, Denali, Richardson, and Glenn Highways), for hunting moose --- including the transportation of big game hunters, their hunting gear and/or parts of big game.

Hunters must report to the nearest ADF&G office within 24 hours of a successful kill. ADF&G may limit the number of moose to be taken in specific zones; (presently outlined in the Community Hunt guidelines.) Should the 100 bull harvest be obtained, zone requirements may be waived.

Proxy-hunting will be allowed in the August 15-27 hunt.

THIS HUNT IS DESIGNED AS A REPLACEMENT TO THE PRESENT COMMUNITY HUNT <u>not as an additional opportunity.</u>

What is the issue you would like the board to address and why? Replace the community hunt for moose in Unit 13 with a more equitable solution for all hunters. The present community hunt does not achieve the compete with intended purpose of helping local communities compete in the field with urban hunters. Many "communities" are composed of urban hunters who can "out-gun" locals who are not as well-funded. Our proposal levels the field and gives all hunters equal opportunity.

Read this proposal carefully. It does not take away or affect the harvest ticket hunt in Unit 13 which is presently from September 1-20th.

Our proposal is a separate entity that is contingent on [REPLACEMENT OF THE COMMUNITY HUNT] that is presently in place.

A non-motorized hunt levels the field and allows locals a significant advantage in locales that they live and work around throughout the season while not restricting anyone who wishes to hunt.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Developed by Paxson Fish and Game Advisory

PROPOSED BY: Paxson Fish and Game Advisory Committee (HQ-F24-048)

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<u>PROPOSAL 47</u>

5 AAC 85.045. Hunting seasons and bag limits for moose.

Open a late season archery only drawing permit hunt for any bull moose in Units 13E and 13B, along the Denali Highway as follows:

Create a late season ANY BULL moose drawing permit for ARCHERY ONLY along the Denali highway in Units 13E and 13B.

I would propose the hunt area to be a 5-mile-wide corridor extending on either side of the Denali highway with a season of September 25th to September 30th.

What is the issue you would like the board to address and why? Alaska needs more archery specific hunting opportunities for moose. Unit 13 has some of the best access of any Unit in the state.

A late season archery only hunt for any bull moose along the Denali Highway would not increase harvest drastically but would offer a great opportunity to hunt moose in an uncrowded environment with easy access.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Jessie Dunshie (HQ-F24-015)
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PROPOSAL 48

5 AAC 92.121. Intensive Management Plan V.

Modify the intensive management plan for Unit 13 to include Nelchina caribou as follows:

Modify the existing intensive management plan, or create a new intensive management plan to add the Nelchina caribou herd populations; to include cow/calf ratios, population objectives.

We expect the Department of Fish and Game to take into consideration both caribou and moose populations when creating the intensive management plan.

What is the issue you would like the board to address and why? There is not a trigger to implement intensive management to address the declining Nelchina caribou population.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, with the public at our local advisory committee.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee (HQ-F24-002)
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Note: Game Management Units 12 and 20 are outside the scope of the Central Southwest Region meeting.

PROPOSAL 49

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Eliminate the harvest of Nelchina caribou as follows:

Close caribou hunting for six years or until the herd reaches the midpoint of the management objective of 37,500. This includes caribou hunting closures in Units 11, 12, 13, 14B, and 20E when Nelchina caribou are present.

What is the issue you would like the board to address and why? Eliminate any incidental take of Nelchina caribou due to the dramatic population decline seen in recent years. With an estimated population of 7,000-8,000 in fall 2023 and a population objective of 35,000-40,000, ensuring no harvest occurs of Nelchina caribou is crucial to rebuilding the herd. We are requesting a six-year hunting moratorium, or hunting closures until the population recovers and reaches the midpoint of the population objective of 37,500. This request is consistent with the March 2023 AITRC recommendation RC081 (see Attachment A).

For the 2023-2024 hunting season, both state and federal harvest of the Nelchina caribou within Unit 13 was closed; with the herd at such a low population estimate and after another heavy snow load, it is expected that winter mortality and calf recruitment will exasperate current population trends. For the herd's future longevity, AITRC asks for a six-year moratorium of the Nelchina caribou or until the herd reaches the midpoint of the population objective of 37,500. In addition, it is crucial that the Board of Game expand closures to all Units Nelchina occupies, or when present, to reduce any incidental take of a herd that has experienced such a rapid decline in recent years. This would include Units 11, 12, 13, 14B, and 20E.

Looking at reports and figures produced by the Alaska Department of Fish and Game in the Nelchina Caribou News 2017 (Figure 1) and Nelchina Caribou News 2023 (Figure 2), it is clear that GPS collared individuals reside within the Units recommended for closure. In addition, it has been observed through GPS collar data and radio tracking in fall 2012-2015 that considerable mixing occurred with Nelchina caribou within Unit 14B. Through the capture effort 22 animals were deployed with GPS collars and through tracking 40% of the caribou traveled into Unit 13E and 13A (Peltier and Brockman 2020).

It is critical that regulations are adopted to ensure the Nelchina caribou herd's additional protection while it is at one of the lowest populations observed in the last 50 years. This will allow the herd the best chance for a speedy recovery, as this herd has significant cultural ties and has been a staple food source for not only Tribal Citizens but many Alaskan residents as well.

Reference Cited:

Peltier, T. C., and C. Brockman. 2020. Caribou management report and plan, Game Management Units 14A and 14B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-11, Juneau.

Note: The figures and attachments provided with this proposal are available on the proposal book website at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? N/A

PROPOSED BY: Ahtna Intertribal Resource Commission (AITRC) (HQ-F24-042)
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PROPOSAL 50

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.
Change the sheep draw hunt DS165 in Unit 13D to a general season hunt as follows:

I would propose the board eliminate the sheep drawing permit DS165 and return it to harvest ticket regulations. This aligns that portion of 13D with the current management strategy for sheep hunting.

The new regulation would be:

Unit 13D
East of a line along the west
side of Tazlina Glacier, Tazlina
Lake and Mendeltna Creek to
the Richardson Highway

Resident Hunters: HT: One ram with full-curl horn or larger, Aug.10-Sept. 20

What is the issue you would like the board to address and why? The issue is restricted hunting opportunity on sheep hunters and the consistency of the current management strategy.

Hunt DS165 was created in 2008 when that portion of Unit 13D was converted from general harvest regulations for sheep to a drawing permit hunt. DS165 is not being managed for trophy potential or hunt aesthetics (like Tok or Delta drawing permits) and prior to being converted to a draw permit, Unit 13D received hunting pressure consistent with Unit 20A which is currently still utilizing general harvest regulations.

Since there is no biological concern with low density sheep numbers and harvesting rams under the full curl regulation, hunt DS165 goes against the current management strategy and is not necessary for conservation purposes.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? No.

PROPOSED BY: Jessie Dunshie (HQ-F24-014)
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PROPOSAL 51

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Open a resident only sheep hunt in the Chitina River drainage in Unit 11 as follows.

If adopted, the new regulation would appear under the sheep regulations of Unit 11, on page 71 and read as follows:

The area of Unit 11, North of the Chitina River, west of canyon creek, and south of young creek (MacColl ridge): Nonresident: No open season.

What is the issue you would like the board to address and why? Create a RESIDENT ONLY sheep hunt in the Chitina River drainage, specifically the MacColl Ridge complex. MacColl Ridge is an isolated area within Unit 11 that holds a small population of Dall sheep. Due to its close proximity to a hunting lodge that specializes in sheep hunts, the majority of hunting pressure and harvest of sheep on MacColl Ridge is likely from guided nonresidents. In a time with declining sheep populations but high nonresident demand, there needs to be areas of opportunity for resident hunters to hunt sheep without the added competition and pressure from guided nonresidents. This regulation takes very little opportunity from nonresident hunters, as they can freely hunt the remainder of Unit 11.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This proposal was developed solely by myself.

PROPOSED BY: Jessie Dunshie (HQ-F24-010)

****

PROPOSAL 52

5 AAC 92.530. Management areas.

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Create a new management area around MacColl Ridge in Unit 11, open to resident sheep hunting by registration permit only, as follows:

If adopted, the new regulation would appear under the sheep regulations of Unit 11, on page 71 as well as on page 69 as a management area and read as follows:

MacColl Ridge Management Area:
The area of Unit 11 North of the Chitina River, west of Canyon Creek, and south of Young Creek (MacColl Ridge): **Open to sheep hunting by registration permit only.**

RESIDENT SEASON: Aug. 10th to Sept. 20th

NONRESIDENT SEASON**: No open season**

What is the issue you would like the board to address and why? Create a new management area around MacColl Ridge open to sheep hunting by registration permit only, with **no open season for nonresidents.**

MacColl Ridge is an isolated set of mountains in the Chitina River drainage within Unit 11 and holds a small population of Dall sheep. Due to its close proximity to a hunting lodge specializing in sheep hunts, the majority of hunting pressure and harvest of sheep on MacColl Ridge is likely from guided nonresidents. At the present time, sheep populations around Alaska are severely depleted, areas are being shut down further limiting resident opportunity, and non-resident demand for hunts is at an all time high. There needs to be areas that give opportunity and preference to resident sheep hunters to hunt without the added competition and pressure from guided non-residents.

MacColl Ridge is an ideal location for this proposed regulation because: **1)** It's an easily defined landmark and boundary. **2)** It's one of the more accessible areas of unit 11 with ample landing spots to drop hunters. **3)** Takes very little opportunity from non-resident hunters, as they can freely hunt the remainder of Unit 11.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Coordination with other hunters.

PROPOSED BY: Jesse Dunshie (EG-F24-006)

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PROPOSAL 53

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Establish a resident, archery only sheep drawing hunt in Unit 13D as follows:

Create an archery only resident Dall sheep drawing hunt for Unit 13D that includes both Units 13D West and East into one hunt area. Season dates would be October 1-15th and the bag limit would be a full curl ram. It is understood that sheep numbers are down in these areas so the Department of Fish and Game may only want to issue 1-5 tags until populations begin to recover. Archery hunting for full curl rams is very low success < 5% but provides archery hunters the opportunity to hunt without the competition of rifle hunters who can shoot rams at ever increasing distances. As an item of note an additional proposal was submitted in the statewide regulations that would NOT allow the use of aerial scouting during these season dates.

What is the issue you would like the board to address and why? Limited archery only sheep hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-078)

****

PROPOSAL 54

5 AAC 85.055. Hunting season and bag limits for Dall sheep.

Change the bag limit for the Unit 13D sheep drawing hunts, DS160 and DS260 as follows:

R Unit 13D "west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek" One ram **with a full curl horn or larger, 8 yrs old or two broken tips (broomed**) [ANY RAM] *by permit.*

NR Unit 13D "west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek" One ram **with a full curl horn or larger, 8 yrs old or two broken tips (broomed**) [ANY RAM] *every four regulatory year by permit.*

What is the issue you would like the board to address and why? Currently there are low ram populations in permits DS160 and DS260 area, which includes "west of a line along the west side of Tazlina Glacier, Tazlina Lake and Mendeltna Creek". This needs to align with the rest of Unit 13D's permit hunts including DS165 and DS265, with a full curl horn or larger, 8 years old or two broken tips (broomed) regulation criteria. This area, "east of a line along the west side of Tazlina Glacier, Tazlina Lake and to Mendeltna Creek to the Richardson Highway", would then align with the conservation approach of the neighboring permit area as mentioned above. Full curl horn or larger, eight years old or two broken tips (broomed) regulation criteria should be used in areas with low ram populations to secure future healthy ram populations by not harvesting young and immature, non-breeding rams.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed with the coordination of the Matanuska Valley Advisory Committee. Members of the committee were able to share information regarding this hunt area to develop this proposal.

PROPOSED BY: Herb Mansavage and Dan Montgomery (HQ-F24-037)
****

PROPOSAL 55

5 AAC 85.040. Hunting season and bag limits for goat.

Divide the goat drawing permit hunt DG720 into three separate permit hunts as follows:

I would propose the DG720 permit be split up into three different permits with smaller hunt areas and separate quotas. The new structure could look as follows:

DG720 = Area east of the Richardson hwy to include the Tonsina Controlled Use Area,

DGXXX = Unit 13D west of the Richardson hwy to east side of Tazlina Glacier, and

DGXXX = Unit 13D Tazlina Glacier west to Coal Creek drainage (remainder of current DG720 area).

What is the issue you would like the board to address and why? DG720 receives about 2,000 applications per year but only eight permits were issued for 2024. With such a large hunt area, it should be able support a harvest of more than eight goats. Only a small portion of DG720 is road accessible, which probably sees the highest hunter effort and therefore harvest. To offer more permits, better opportunity to hunters, and most likely better population management, DG720 should be split into three separate permits consisting of smaller hunt areas with separate quotas.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Jesse Dunshie (EG-F24-059)
****

PROPOSAL 56

5 AAC 85.040. Hunting seasons and bag limits for goat.

Establish an archery only registration goat hunt in Units 13D and 11 as follows:

Create an additional archery only registration goat hunt for RG580 (Units 13D and 11) with season dates of August 16 - 31. The permit bag limit is one goat for residents and nonresidents and the permit may only be issued in person at the same locations as the RG580 permit.

What is the issue you would like the board to address and why? Limited archery only goat hunting opportunities.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? No.

PROPOSED BY: Craig Van Arsdale (EG-F24-080)
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PROPOSAL 57

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Increase the bag limit for brown bear in Unit 13 as follows:

B -Brown/Grizzly Bear: 13E within Denali State Park **TWO** [One] bear(s) every regulatory year from August 10-June 15

B -Brown/Grizzly Bear: 13 remainder **TWO** [One] bear(s) every regulatory – no closed season

What is the issue you would like the board to address and why? Brown and grizzly bears are currently at high population levels in Unit 13 and their hardship on moose and caribou are reaching

unstainable levels. Many hunters use bait stations and/or motorized vehicles hunt for brown/grizzly bears during the spring and early summer in Alaska but are unable to take a bear in the fall due to the one bear per regulatory regulation. This would allow for another opportunity to hunt brown/grizzly bears in the fall, while still allowing for traditional spring bear hunting opportunity. Unit 16 saw an increase to two brown/grizzly bears per regulatory year and the unit has seen the positive effects on moose populations with its change.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This was developed in coordination with the Matanuska Valley Advisory Committee as many of our members are closely familiar with Unit 13 and its constituents are primary members of Unit 13.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (HQ-F24-033)
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PROPOSAL 58

5 AAC 92.121. Intensive Management Plan V.

Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves as follows:

Decrease the minimum wolf population to 100 in Unit 13 in the Intensive Management Plan.

What is the issue you would like the board to address and why? The current minimum wolf population in Unit 13 is 135 which is too high for Nelchina caribou population recovery. The Nelchina caribou herd population objective is 35,000 - 40,000, we are currently at around 8000 ~ animals. The entire caribou harvest is closed, and the management objective for this herd is to provide for subsistence needs.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Yes, with the public at our local advisory committee, and the ADF&G staff.

PROPOSED BY: Copper Basin Fish & Game Advisory Committee (HQ-F24-003)
****

PROPOSAL 59

5 AAC 84.270. Furbearer trapping

Lengthen the wolf trapping season in Unit 11 as follows:

October 15 [NOV 10] - **April 30** [MARCH 31]

What is the issue you would like the board to address and why? Lengthen the Unit 11 wolf trapping season to align with the season dates in Units 12 and 13 in order to provide additional opportunity to harvest wolves. SRC members noted that wolves are abundant and that providing

additional harvest opportunity could help mitigate predation on other species such as sheep, moose, and caribou.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal is being submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, a citizen advisory committee. The Commission met in Gakona, Alaska, on March 14 and 15, to hear from the public and discuss a variety of issues related to fish and wildlife harvest. The Commission developed this proposal during that meeting.

PROPOSED BY: Wrangell-St. Elias National Park Subsistence Resource Commission (HQ-F24-005)
****

PROPOSAL 60

5 AAC 84.270. Furbearer trapping.

Lengthen the coyote trapping season in Unit 11 as follows:

October 15 [NOV 10] - **April 30** [MARCH 31]

What is the issue you would like the board to address and why? Lengthen the Unit 11 coyote trapping season to align with the season in Unit 12 in order to provide additional opportunity to harvest coyotes. Providing additional harvest opportunity could help mitigate predation on other species such as sheep, moose, and caribou.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? This proposal is being submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, a citizen advisory committee. The Commission met in Gakona, Alaska, on March 14 and 15, to hear from the public and discuss a variety of issues related to fish and wildlife harvest. The Commission developed this proposal during that meeting.

PROPOSED BY: Wrangell-St. Elias National Park Subsistence Resource Commission (HQ-F24-004)
****

PROPOSAL 61

5 AAC 85.065 Hunting seasons and bag limits for small game.

Change the start date for the ptarmigan hunting season in Unit 13B as follows:

Ptarmigan Unit 13B

August 20 - February 15

10 per day - 20 in possession

What is the issue you would like the board to address and why? Ptarmigan season opening date in Unit 13B.

Ptarmigan season in Unit 13B opens August 10. Unit 13B is road accessible and sees a fair amount of hunt pressure. Much of the high country along the Denali Highway where the majority of the ptarmigan are taken, experience late spring hatches due to snow cover. The results in later hatching chicks that are still peeping when the present season opens August 10.

Birds that small are of marginal use for food. Hunting is enjoyable to be sure, but the primary objective should be the use of animals and birds we take. Thus, our committee feels that an August 20 opening would better address the issue of having a bird worth eating. This is the fifth game cycle our advisory committee has addressed the issue to no avail. We hope that this board would consider our experience and accept our proposal.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? Paxson Fish and Game Advisory Committee.

PROPOSED BY: Paxson Fish and Game Advisory Committee (EG-F24-030)
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PROPOSAL 62

5 AAC 85.065. Hunting seasons and bag limits for small game.

Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D as follows:

Option 1

Unit	Season	Bag Limit
13A, 13C, 13D	August 10 – April 30	10 ptarmigan per day, 20 in possession

Option 2

Unit	Season	Bag Limit
13A, 13C, 13D	August 10 – March 31	10 ptarmigan per day, 20 in possession
13A, 13C, 13D	April 1 – April 30	5 ptarmigan per day, 10 in possession

What is the issue you would like the board to address and why? I would like to increase the opportunity for hunters in Units 13A, 13C, and 13D to pursue spring ptarmigan during the month of April. Currently, the season for ptarmigan in Units 13A, 13C, and 13D ends on March 31. Hunters who wish to pursue ptarmigan during April currently have to travel to Units 1-5, 6A/B/C, 8, 10, 12, and 17- 26 to do so. This would also allow individuals living in the region to take

advantage of the longer daylight and improved weather in April to enjoy going out on hunts before or after typical business hours during the week. The extension of the ptarmigan season in Units 13A, 13C, and 13D by one month would be unlikely to cause a negative impact on the population. In the alternative, any potential negative impact could be mitigated by a reduced bag limit, similar to Units 12, 20, and 25C, for a portion of the season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee? I developed this proposal myself.

PROPOSED BY: Jonathon Green (HQ-F24-028)

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PROPOSAL 63

5 AAC 85.065. Hunting seasons and bag limits for small game.

Require a registration permit to hunt ptarmigan in Units 13B and 13E as follows:

Units and Bag Limits (3)	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
…		
Unit 13(B) 10 per day 20 in possession, **by registration permit only;**	Aug. 10–Feb. 15	Aug. 10–Feb. 15
…		
Unit 13(E) 10 per day 20 in possession**,** **by registration permit only;**	Aug. 10–Feb. 15	Aug. 10–Feb. 15
…		

What is the issue you would like the board to address and why? Ptarmigan hunting in Alaska is a very popular activity for both subsistence and non-subsistence users. Data from voluntarily submitted hunter harvested wings suggest Unit 13B is one of the most popular, if not the most popular, subunits to hunt ptarmigan in terms of the number of hunters that successfully harvested ptarmigan. Despite this popularity, there is no requirement for small game hunters to report on their harvest and all harvest data available is voluntarily submitted, with a few exceptions in state game refuges or management areas near urban areas.

Although voluntarily submitted harvest information is helpful to ADF&G, biologists have very limited ability to collect data on the total number of small game hunters from year to year or annual

harvest rates. Previous efforts to collect data through hunter surveys (2012–2013) from the large number of resident and non-resident hunters that had multiple license purchase options (e.g., resident hunting, resident hunting and trapping, non-resident small game, non-resident hunting, non-resident military hunting, non-resident military hunting and trapping, etc.) were hampered by low hunter response rates (11–30%) and the need to sample from all license purchase options to obtain a meaningful data set.

A registration permit for hunting ptarmigan in Unit 13B would provide important data from an area that receives heavy hunting pressure, has limited participation in voluntarily submitted harvest information, and has historically experienced multiple regulatory changes resulting from proposals submitted by members of the public and local advisory committees.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-076)

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

PROJECT FUNDING TO ADDRESS SUBSISTENCE FOOD SECURITY RESILIENCE

HOW TO APPLY

The National Park Service Alaska Region has been awarded approximately $6.2 million of Inflation Reduction Act funding for a project that aims to mitigate environmental uncertainties and enhance subsistence food security resilience through project-funding agreements as well as research and monitoring activities focusing on key subsistence species. Approximately $500,000 is available for projects designed to support food security resilience in rural communities affiliated with Wrangell-St. Elias National Park and Preserve.

In order to be funded, projects must:

- Benefit the public at large,
- Relate in some manner to subsistence resources harvested from federal public lands and/or associated waters, and
- Enhance food security resilience for subsistence-dependent rural communities where food security concerns are attributable in part to climate-related environmental changes.

Examples of projects that may be funded include (but are not limited to) the following:

- Subsistence fish and wildlife monitoring projects and/or harvest monitoring and reporting managed locally with local hires;
- Projects that enhance the capacity of rural communities to engage effectively with federal and state regulatory programs and advocate for regulatory changes that ensure stability of access to subsistence foods in the context of changing patterns of fish and wildlife availability;
- Projects for documenting and incorporating local knowledge into management decisions;
- Youth and elder programs for transmission of knowledge about subsistence resources and their harvest and processing across generations;
- Projects that enhance the capacity of communities to harvest and store subsistence foods in the context of changing environmental conditions, for example, fish wheels or structures for processing harvested fish and/or wildlife; and
- Specific to Alaska Native villages and tribes, subsistence-related Tribal-NPS liaison programs.

Available funding:

- Approximately $20,000 - $25,000 is available per community, based on the total amount of available funding and the number of WRST-affiliated communities.

Project scope:

- Projects can focus on a single community or be regionally based benefiting rural residents of multiple park-affiliated communities.

Who can apply:

- Tribal governments,
- Community-based nonprofit organizations, and
- Educational institutions.

How and when to apply:

- Email your application to WRST_Subsistence@nps.gov.
- Applications must be submitted no later than 5 p.m. Alaska Time, September 30, 2024.
- Please also provide a resolution or letter of support from the tribal council or organization's board indicating its agreement on the project idea by no later than December 31, 2024. (The resolution can also be submitted concurrently with the proposal.)

Please include the following information in your application:

- Organization name, contact person name, email address, and phone number;
- Brief description of the organization and its purpose;
- Name of community or region that would benefit from the project;
- Total funding request;
- Description of your project, including project goals and how these relate to the following criteria:
  1. public benefit,
  2. connection to subsistence resources harvested from federal lands or waters, and
  3. enhancement of food security resilience for subsistence-dependent rural communities where food security concerns are attributable in part to climate-related environmental changes.
- An itemized budget that specifies for each item:
  1. what,
  2. how much, and
  3. how many.
- Whether your organization has previously entered into a cooperative agreement with a federal agency or has a current Negotiated Indirect Cost Rate Agreement (NICRA) with a federal agency.

Contacts for more information:

- Email WRST_Subsistence@nps.gov, or
- Call Barbara Cellarius at (907) 822-7236 or Mark Miller at (907) 302-1373.

Key definitions:

In the context of this funding opportunity, we have adopted the following definitions for *food security* and *resilience*.

Food security: The condition that exists when all people, at all times, have physical and economic access to sufficient safe and nutritious food that meets their dietary needs and food preferences for an active and health life. The concept of food security has four main dimensions[1]:

1. Physical AVAILABILITY of food,
2. Economic and physical ACCESS to food,
3. Bodily UTILIZATION of food, and
4. STABILITY of the other three dimensions over time.

Some Alaska Native definitions of food security include two additional dimensions[2]:

5. DECISION-MAKING POWER AND MANAGEMENT, and
6. INDIGENOUS CULTURE.

Resilience: The ability of rural, park-affiliated communities to maintain, recover, or enhance their *ongoing capacity* (rather than one-time capacity) for meeting subsistence food security needs in the context of changing environmental conditions. The concept of resilience also applies to changing societal conditions.

[1] United Nations Food and Agriculture Organization, see https://www.fao.org/3/al936e/al936e00.pdf.
[2] Inuit Circumpolar Council-Alaska, see https://iccalaska.org/wp-icc/wp-content/uploads/2016/03/Food-Security-Report-Brochure.pdf.

Fisheries Resource Monitoring Program
Potential 2024 Priority Information Needs as Identified by the Southeast Alaska Subsistence Regional Advisory Council

Working List

- Reliable estimates of Sockeye Salmon escapement and in-season harvest and estimates of stream discharge in the following systems: Kanalku, Klawock, Hetta, Falls, Sarkar, Kook, Neva, Karta, Hatchery, Eek, Kah Sheets, Klag, Gut, Kutlaku, Salmon Bay, Sitkoh, Hoktaheen, Alecks Creek, Lake Eva and Lake Leo.
- Reliable estimates of salmon escapement and in-season harvest of subsistence salmon systems.
- Escapement indexes or population estimates for Eulachon at the Unuk River and Yakutat Forelands.
- Population assessment for Eulachon for northern Southeast Alaska.
- Traditional ecological knowledge of how each community distributes harvest between Sockeye Salmon systems available to them.
- Reliable estimates of salmon populations and harvests in the sport and subsistence fisheries at Kah Sheets and Alecks Creek.
- Ethnographic study of the Yakutat subsistence salmon fishery.
- Reliable estimates of subsistence Sockeye Salmon harvest in the Klawock River drainage.
- Develop escapement goals for Sockeye Salmon systems with long term escapement data sets
- Incorporate the use of indigenous co-management to develop escapement goals for Sockeye Salmon systems with long term escapement data sets.
- Assessment of Makhnati Island herring stock.
- Update community household fish harvest surveys.

Last reviewed by council: Fall 2022 meeting

Southcentral Region Draft Priority Information Needs

8/11/2024

The following are priority information needs captured from discussion during the Southcentral Region PIN development session. Attendees included Greg Encelewski (SCRAC), Andy McLaughlin (SCRAC), and OSM staff Hannah Vorhees, Nissa Pilcher, and Kevin Foley.

- Estimate Chinook, Coho, and Sockeye salmon escapements into the Copper River drainage and delta systems with a high degree of certainty (for example, projects utilizing weir, sonar, and/or mark-recapture methods).
- Collect baseline information on juvenile Chinook, Coho, and Sockeye salmon outmigration including abundance, and/or timing, condition, and mortality across the unique sub-watersheds of the Copper River and the Kenai Peninsula drainages.
- Document food web dynamics and factors affecting early marine survival rates of southcentral origin wild Chinook and Coho salmon stocks including variables such as primary food resources and prey availability, competition with hatchery produced salmon, and prey buffering during periods of high/ low abundance.
- Understand effects of environmental and/or climate change on stock specific migration timing and abundance of juvenile and adult salmon, as well as the implications for harvest management, in the Copper River and Kenai Peninsula drainages.
- Estimate measures of abundance, and/or run timing, spawning site fidelity, fecundity, age, sex, and length composition for Chinook, Coho, and Sockeye salmon in the Copper River or Kenai Peninsula drainages.

Council member McLaughlin identified a priority information need for understanding the effects of toxins and contaminants on Southcentral origin wild Chinook Salmon mortality. Further, Mr. McLaughlin suggested including a comparative analysis of toxin levels and mortality of Chinook Salmon to mortality rates of other salmon species in the region. Lastly, Mr. McLaughlin expressed a need for exploring lethal toxicity (lethal dose and lethal concentrations) of contaminants on marine survival rates of Chinook Salmon.

A review of the types of projects not funded by the FRMP includes projects of contaminant assessment, evaluation, and monitoring. Based on no funding availability for these types of projects, OSM staff did not include Mr. McLaughlin's information need on the draft list put before the Council.

2026 Draft Yukon Priority Information Needs

- Impacts of climate change to harvest and use of fish; and impacts of climate change on fish, for example, impacts to fish migration, spawning, and life cycle.
- Knowledge of population, reproduction, and health of spawning habitat for Bering Cisco and Humpback Whitefish.
- Estimates of Chinook, summer Chum, fall Chum, and Coho salmon escapements and/or harvests.
- Distribution, abundance, condition, and survival of juvenile and out-migrating salmon in the Yukon River drainage.
- **Increase understanding of the abundance, distribution, migration patterns, and spawning locations of Chinook and Chum salmon in the Innoko River.**
- **Non-lethal** estimates of "quality of escapement" for Chinook Salmon, for example, potential egg deposition, age, sex, and size composition of spawners, **weight and girth of spawners**, percentage of females, percentage of jacks, and spawning habitat usage, with an emphasis on Canadian-origin stocks.
- Community-based monitoring of **salmon and resident species'** presence, **abundance, life history patterns, harvests, genetics and age-sex-length composition, incidental and delayed mortality from entanglements and drop-outs, habitat restoration needs,** and/or environmental variables in tributaries to better understand fish and **keep users engaged during years of limited fishing opportunities**.
- In-season estimates of genetic stock composition of Chinook, summer Chum, and fall Chum salmon runs.
- Traditional ecological knowledge of fishes, **for example, to identify salmon spawning and/or rearing locations and expand the Anadromous Waters Catalog**.
- Advance genetic baselines for Chinook, summer Chum, fall Chum, and Coho salmon by screening additional populations and novel genetic markers to improve the accuracy, precision, and scale of stock composition estimates to inform stock assessment for Yukon River fisheries **at the tributary level**.
- Funding to facilitate interagency, **Tribal,** and stakeholder forums for gathering and sharing input on fishery management issues, **including cross-jurisdictional and co-management of salmon**.
- Seasonal salmon life-stage usage of tidal tributaries draining the Yukon Coastal District through an interdisciplinary approach documenting traditional ecological knowledge and biological surveys in order to update the Anadromous Waters Catalog and improve management's understanding of salmon in these streams.
- Meta-analysis of existing information and research examining the relative importance of freshwater (e.g., predation, stranding, heat stress, **reduction in marine-derived nutrients**) and marine (e.g., environmental conditions, bycatch, interception, **migration routes, hatchery production and** competition) factors in causing declines of Yukon River Chinook and Chum salmon **and/or resident species** to present at relevant Regional Advisory Council meetings.

Winter 2025 Regional Advisory Council Meeting Calendar

Last updated 8/21/2024

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