| 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.<br><br>*Submitted by: Office of Subsistence Management* |
| **Proposed Regulation** | See page 2. |
| **OSM Preliminary Conclusion** | **Support** Proposal WP25-01 **with modification** to specify which communities are eligible to hunt caribou via the §804 user prioritization analysis, add WRST and DENA superintendents to the entities consulted in Unit 13 remainder, and rescind DALs, moving existing delegated authority to unit-specific regulations. |
| **OSM Conclusion** | **Support as modified** by the Southcentral Alaska and Eastern Interior Alaska Regional Advisory Councils. |
| **Southcentral Alaska Subsistence Regional Advisory Council Recommendation** | **Support as modified** by the Eastern Interior Council (including the OSM modifications in the preliminary conclusion and additional modifications to the §804 determination made by the Eastern Interior Council). |
| **Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation** | **Support as modified** by Office of Subsistence Management in the preliminary conclusion, with additional modifications to the §804 determination: add Gakona to Unit 13A, Gulkana to Unit 13C, and Mentasta Lake and Chistochina to Unit 12 remainder. |
| **Interagency Staff Committee Comments** | The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal. |
| **ADF&G Comments** | **Neutral** |
| **Written Public Comments** | **None** |

# STAFF ANALYSIS
# WP25-01

## ISSUES

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

## DISCUSSION

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

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

**Existing Federal Regulation**

**Unit 11−Caribou**

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

**Unit 12−Caribou**

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

**Unit 13−Caribou**

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

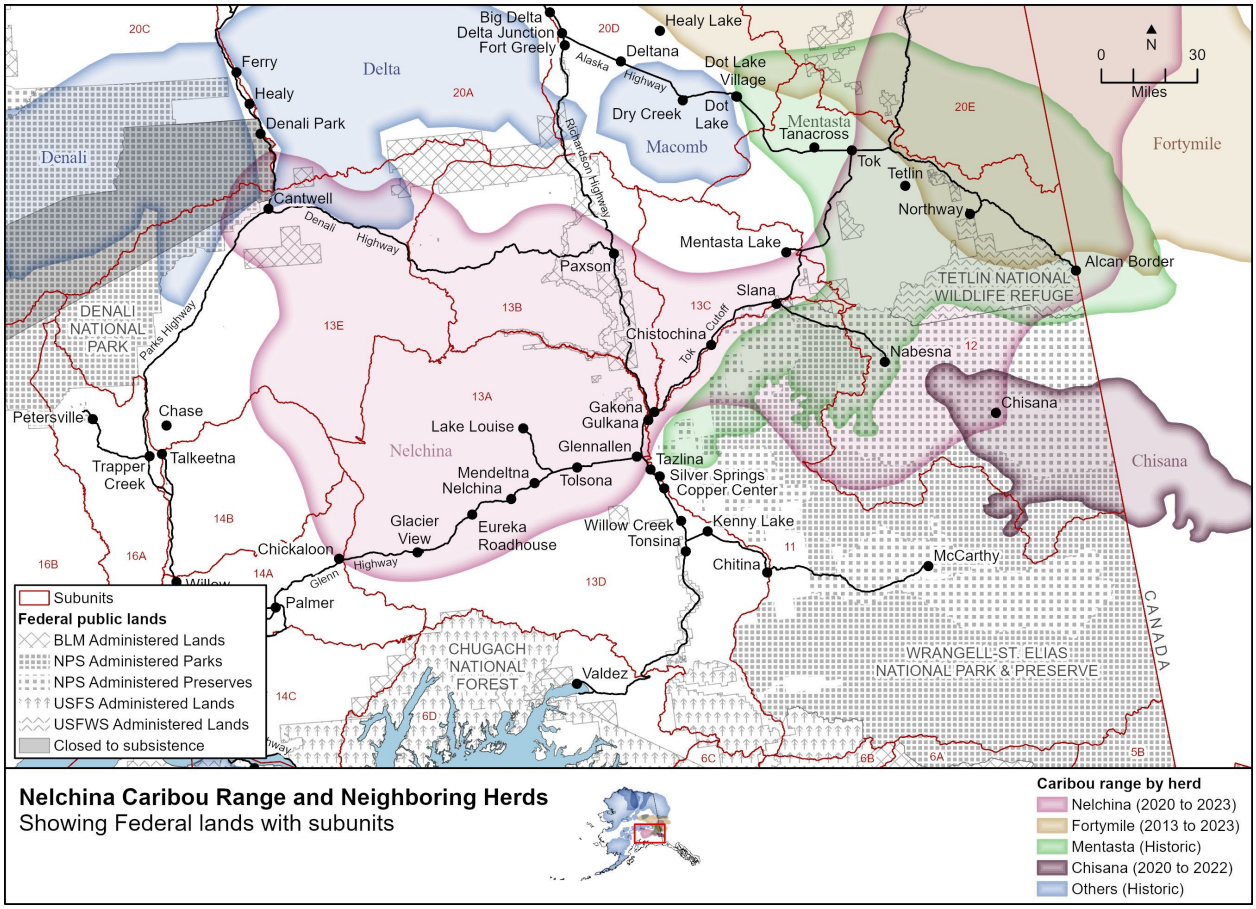


**Figure 1.** Federal public lands and caribou herd ranges in Units 11, 12, and 13.

**Customary and Traditional Use Determinations**

Unit 11

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

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

Unit 12

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

Unit 13

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

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

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

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

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

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

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

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

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

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

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

***Excluding the residents of Denali Park Headquarters

National Park Service Resident Zones

Only people living withing a national park or monument, people living in resident zone communities and those households holding subsistence use permits issued under 36 CFR 13.440 can hunt in national parks and monuments. The resident zone communities for Wrangell-St. Elias National Park are: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway/Northway Village/Northway Junction, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and Yakutat.

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

**Regulatory History**

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

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

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

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

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

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

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

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

believed the closure would not alleviate public safety concerns as non-federally qualified users would still be able to cross Federal public lands to access State and private lands.

In 2020, the Board adopted several proposals and special actions affecting caribou in Unit 13. First, in April the Board adopted deferred proposal WP18-19 with modification, establishing a community harvest system for moose and caribou in Unit 13 and for moose in Unit 11.

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

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

Also in July 2020, the Board approved Wildlife Special Action WSA20-02 with modification regarding the AITRC administered community harvest system. In April 2022, the Board adopted Wildlife Proposal WP22-36, which codified these temporary regulations, including expansion of the community harvest system for moose and caribou in a portion of Unit 12.

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

In 2022, ADF&G took action to lessen the steep decline of the NCH population by changing harvest limits. Severe winter conditions resulted in a low population estimate with a lower-than-expected harvestable surplus. ADF&G established the resident caribou harvest limit in Unit 13 as one bull, with a harvest quota of 1,000 bull caribou (615 allocated to State harvest and 385 for Federal harvest).

These low harvest quotas led to both State registration hunts being closed by EO when quotas were exceeded. ADF&G requested the BLM in-season manager restrict harvest under Federal regulations to bulls only, which the manager opted not to do.

On June 30, 2023, the State announced the closure of all NCH hunts for the 2023/24 season via EO R4-01-23. This EO closed the two Tier I registration hunts (RC561 and RC562) and the community subsistence hunt (CC001). The resident youth hunt (YC495) and resident drawing hunt (DC485) were not offered during the drawing application period of 2022 (ADF&G 2022a), as ADF&G determined the NCH population was too low to offer these opportunities.

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

In April 2024, the Board adopted Wildlife Proposal WP24-09, which delegated authority to the BLM Glennallen FO manager to manage the Federal caribou hunts in Units 13A and 13B and added AITRC to the list of entities for consultation via a delegation of authority letter. It also changed the Units 13A and 13B harvest limits from “two caribou” to “up to two caribou.” Adoption of WP24-09 expanded the in-season manager’s authority, allowing for greater management flexibility and more timely responses to changing hunt and herd conditions.

In June 2024, the Board considered WSA24-02, submitted by the WRST SRC, which requested closure of Federal public lands in Units 11, 12 remainder and 13 to caribou hunting by all users for the 2024/2025 regulatory year and asked that an ANILCA §804 user prioritization analysis be conducted for the NCH. The Board also considered WSA24-03, submitted by the BLM Glennallen Field Office, which made the same request. Both requests were due to continued decline of the NCH population. The Board approved WSA24-02 with modification to provide exceptions for traditional religious ceremonies and cultural/educational program permit harvest and postpone a decision on the §804 user prioritization analysis to the February 2025 Board fisheries regulatory meeting. This proposal, WP25-01, implements that deferral, ensuring that the §804 analysis will go through the full public process, including consideration by the Regional Advisory Councils. The Board took no action on WSA24-03. The Board stated that conservation concerns warranted a closure to caribou hunting by all users, while its modification provided for cultural continuation and transfer of knowledge through generations.

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

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

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

**Current Events Involving the Species**

Public Hearing on Related Special Action Request

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

Tribal Consultation

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

During the ANCSA corporation consultation held May 10, 2024, one caller from Northway Village testified. He described how village residents hunt caribou and how difficult it can be depending on whether the caribou are on State or Federal public lands. He mentioned how harvest of caribou, which has always been secondary to moose in harvest by locals, is currently less than it used to be, although he did not know why. Moose are very important to residents of Northway Village, with caribou usually taken when people are unable to harvest enough moose. He also voiced concerns over being able to take a caribou for a potlatch ceremony if harvest was still restricted on the NCH.

**Biological Background**

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

State management goals and harvest objectives are based on the principle of sustained yield (maximum harvestable amount while maintaining herd viability) (Robbins 2015). Since the mid-1990s, ADF&G has experimentally managed the NCH using hunter harvest to maintain the herd below carrying capacity of the range. This experimental management regime proves difficult to maintain if annual composition or count data are not collected. Harvest quotas in subsequent years must be adjusted to compensate for miscalculations in abundance made from a lack of data (Hatcher and Robbins 2021). The goal is to prevent overuse of the NCH range and large swings in abundance, which may lead to drastic declines and extended recovery periods. ADF&G's management objectives are to maintain a fall, post-hunt population of 35,000–40,000 caribou, with minimum ratios of 40 bulls:100 cows and 40 calves:100 cows, and to provide for the harvest of 3,000–6,000 caribou annually (Hatcher and Robbins 2021).

Despite the stringent harvest management, population of the NCH has fluctuated over time, influenced primarily by harvest (Schwanke and Robbins 2013). Between 2003 and 2023, the NCH summer minimum count and fall population estimates ranged from 6,983–53,500 caribou and averaged 36,896 caribou (**Figure 2, Table 2**). The herd has exceeded State population objectives many times, and harvest regulations have been liberalized to quickly reduce the population to preserve habitat conditions. NCH population increases may be a result of a series of mild winters, favorable growing seasons, relatively low harvest rates (Hatcher 2024, pers. comm.), as well as the Intensive Management programs for the FCH in Unit 12 and for moose in Unit 13 with wolf predation control, as there may be less predation on Nelchina caribou and neonate calves (ADF&G 2023c, 2023e). Brown bear predation is usually a more frequent source of mortality on caribou neonates, whereas wolf predation typically occurs later in the caribou life cycle. While brown bear are not a target of the Intensive Management program in either Unit 12 or 13, harvest regulations have been loosened to allow for increased harvest (ADF&G 2023b). Both wolf and brown bear populations are currently low enough that further removal

would not positively affect the caribou population (ADF&G 2023b). The Unit 13 predator control program was initiated in 2000 and is currently active. The Unit 12 program was originally established in 2004, although this program is currently inactive (ADF&G 2023c).

In 2019, the NCH summer minimum count peaked at 53,500 caribou (ADF&G 2019b). The NCH abundance has declined precipitously since then to only 6,983 caribou in October 2023 (**Figure 2**), which is the lowest estimate since 2003 (ADF&G 2023a, 2024a). Factors contributing to this recent decline are believed to include severe winters, late springs, and early/deep snows across the range of the NCH from 2021–2023. The severe and variable winter weather, such as the deep winter snow, led to higher than usual overwinter mortality of both adults and calves for two winters in a row (2021/22 and 2022/23) (Hatcher 2024, pers. comm., ADF&G 2023b). Later spring thaws may delay migration to the calving grounds (ADF&G 2017b). The late arrival of spring in 2021 and 2022 may have affected caribou migrations, as calving occurred later than normal in both springs. The FCH, which shares winter range with the NCH, also calved later than normal in the spring of 2022 (ADF&G 2022b) Preliminary indicators suggest winter conditions during 2023–2024 were milder, which may lead to greater over-winter survival of adult caribou. However, very small surviving calf cohorts from 2021, 2022, and 2023 have the potential to slow population growth and will impact recovery of the NCH (ADF&G 2023d).

Bull:cow and calf:cow ratios have fluctuated greatly over time. Between 2003 and 2023, the fall bull:cow ratio ranged from 23–64 bulls:100 cows and averaged 38 bulls:100 cows, with the second lowest estimate occurring in July 2023 (**Table 2**). The summer observation was used in the fall 2023 estimate as the fall composition results were inconclusive, because the caribou were still sexually segregated during the survey (ADF&G 2024a). The fall calf:100 cow ratio for the same timeframe ranged from 3–55 calves:100 cows and averaged 35 calves:100 cows (**Table 2**). Once again, the composition survey conducted in October 2023 resulted in the lowest observed calf:100 cow ratio of 3 calves:100 cow, indicating an anticipated low recruitment for 2024.

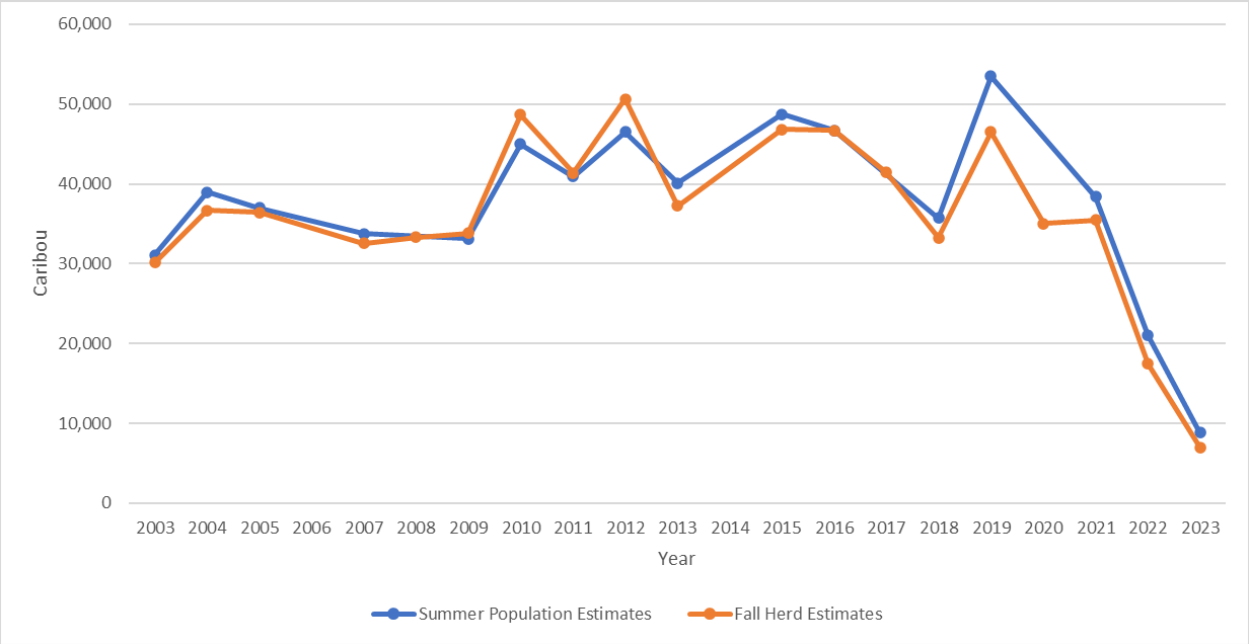


**Figure 2.** Summer and fall population estimates for the NCH (ADF&G 2024a). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

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

| Year | Bulls:100 cows | Calves:100 cows | Summer Estimates | Fall Estimates |
|---|---|---|---|---|
| **2003** | 31 | 35 | 31,114 | 30,141 |
| **2004** | 31 | 45 | 38,961 | 36,677 |
| **2005** | 36 | 41 | 36,993 | 36,428 |
| **2006** | 23 | 40 | | |
| **2007** | 34 | 35 | 33,744 | 32,569 |
| **2008** | 39 | 40 | | 33,288 |
| **2009** | 42 | 29 | 33,146 | 33,837 |
| **2010** | 64 | 55 | 44,954 | 48,653 |
| **2011** | 58 | 45 | 40,915 | 41,394 |
| **2012** | 57 | 31 | 46,496 | 50,646 |
| **2013** | 30 | 19 | 40,121 | 37,257 |
| **2014** | 42 | 45 | | |
| **2015** | 36 | 45 | 48,700 | 46,816 |
| **2016** | 57 | 48 | 46,673 | 46,673 |
| **2017** | 35 | 35 | | 41,411 |
| **2018** | 40 | 20 | 35,703 | 33,229 |
| **2019** | 32 | 41 | 53,500 | 46,528 |
| **2020** | 28 | 17 | | 35,000 |
| **2021** | 38 | 45 | 38,400 | 35,500 |
| **2022** | 26 | 16 | 21,000 | 17,433 |
| **2023** | 25[a] | 3 | 8,823 | 6,983 |
| **Average** | 38 | 35 | 37,453 | 36,340 |

[a] Summer ratio

**Harvest History**

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

Over 95% of total NCH harvest occurs in Unit 13. Between 2001 and 2022, harvest from the NCH under State regulations ranged from 519–5,785 caribou/year (**Table 3**). Over the same period, caribou harvest under Federal regulations in Unit 13 ranged from 102–610 caribou/year (**Table 3**). Federal harvest (FC1302) accounts for 14% of the total Unit 13 caribou harvest on average. Fluctuations in

Unit 13 caribou harvest parallels changes in abundance and population estimations. No Federal or State harvest of Nelchina caribou has occurred since 2022/23 as all hunts were closed due to conservation concerns in 2023.

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

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

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

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

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

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

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

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

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

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

| Regulatory Year | Permits Issued | Hunted | Harvested Male | Harvested Female | Harvested Unknown Sex | Total Harvested |
|---|---|---|---|---|---|---|
| **2001** | 2,565 | 1,469 | 489 | 3 | 6 | 498 |
| **2002** | 2,507 | 1,379 | 323 | 2 | 12 | 337 |
| **2003** | 2,574 | 1,240 | 317 | 2 | 3 | 322 |
| **2004** | 2,555 | 1,337 | 248 | 85 | 2 | 335 |
| **2005** | 2,557 | 1,499 | 365 | 238 | 7 | 610 |
| **2006** | 2,631 | 1,317 | 318 | 238 | 14 | 570 |
| **2007** | 2,399 | 1,092 | 259 | 120 | 6 | 385 |
| **2008** | 2,532 | 1,229 | 180 | 89 | 4 | 273 |
| **2009** | 2,576 | 1,339 | 342 | 7 | 0 | 349 |
| **2010** | 2,852 | 1,535 | 316 | 129 | 6 | 451 |
| **2011** | 2,980 | 1,425 | 281 | 113 | 1 | 395 |
| **2012** | 2,953 | 1,518 | 326 | 203 | 8 | 537 |
| **2013** | 2,781 | 1,303 | 210 | 68 | 1 | 279 |
| **2014** | 2,943 | 1,395 | 177 | 59 | 1 | 237 |
| **2015** | 3,061 | 1,560 | 444 | 147 | 4 | 595 |
| **2016** | 3,151 | 1,530 | 299 | 192 | 0 | 491 |
| **2017** | 3,071 | 1,526 | 208 | 148 | 2 | 358 |
| **2018** | 3,082 | 1,433 | 232 | 135 | 3 | 370 |
| **2019** | 2,785 | 898 | 80 | 21 | 1 | 102 |
| **2020** | 2,915 | 1,194 | 193 | 112 | 1 | 306 |
| **2021** | 2,606 | 945 | 149 | 71 | 0 | 220 |
| **2022** | 2,676 | 1,015 | 115 | 51 | 0 | 166 |
| **2023** | 0 | 0 | 0 | 0 | 0 | 0 |
| **AVERAGE (2001-2022)** | 2,761 | 1,326 | 267 | 102 | 4 | 372 |

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

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

**ANILCA §804 user prioritization**

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

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

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

Structure of the Analysis

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

Communities Included in the Analysis

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

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

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

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

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

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

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

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

The range of the NCH falls largely within the traditional territory of the Ahtna Athabascans (de Laguna and McClellan 1981). The winter range of the herd, though variable, also extends east and north into the upper Tanana region, populated historically by speakers of Tanacross and Upper Tanana Athabascan languages (McKennan 1981, Haynes and Simeone 2007), with whom the Ahtna have historically maintained ties based on reciprocity and kinship (Reckord 1983, Haynes and Simeone 2007). The Ahtna can be divided into four geographical areas corresponding with Ahtna dialects in the nineteenth century: Lower, Central, Upper, and Western Ahtna (Simeone et al. 2019). Western and Central Ahtna historically relied more on the NCH, while the Upper Ahtna relied more on "mountain caribou" (Simeone 2006:3).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Community Profiles

*McCarthy*

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

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

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

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

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

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

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

*McCarthy Road*

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

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

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

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

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

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

*Mentasta Lake*

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

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

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

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

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

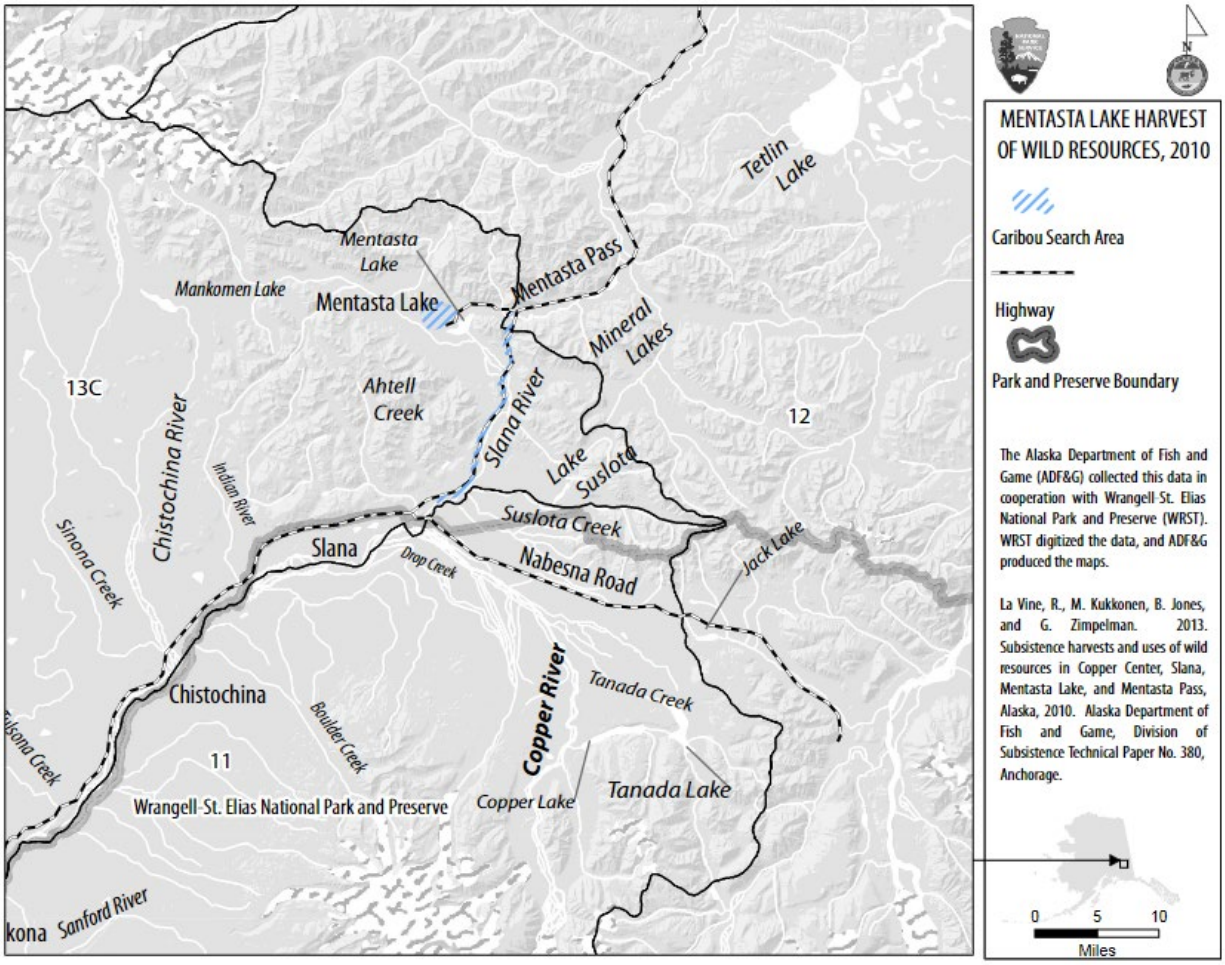


**Figure 3**. Mentasta Lake's documented caribou search areas, 2010 (La Vine et al. 2013).

*Mentasta Pass*

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

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

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

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

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

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

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

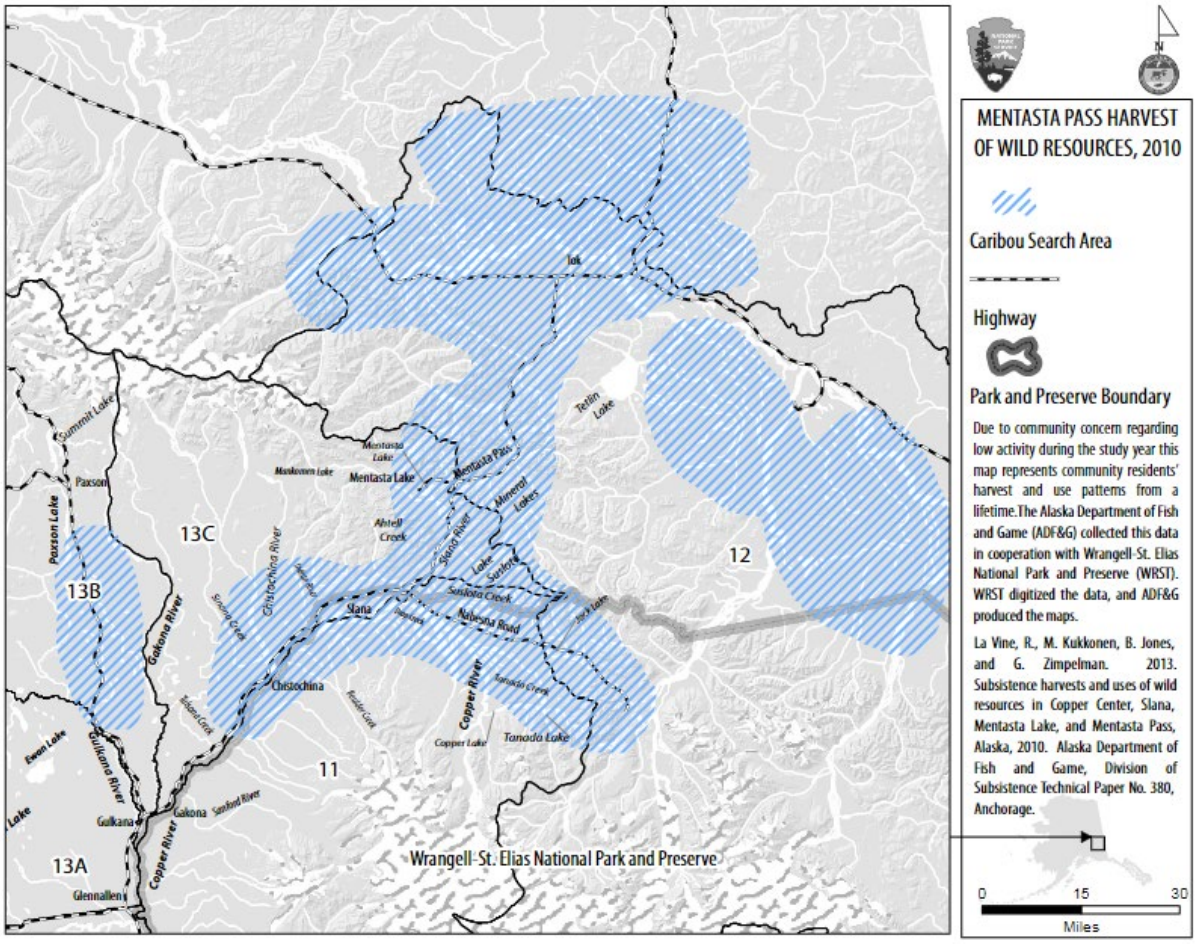


**Figure 4.** Mentasta Pass' documented search area for caribou. Although the map is labeled "2010," the Division of Subsistence report indicates that residents shared search areas from previous areas as well (La Vine et al. 2013). This likely increased the search areas mapped when compared to communities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

*Northway*

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

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

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

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

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

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

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

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

*Tanacross*

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

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

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

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

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

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

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

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

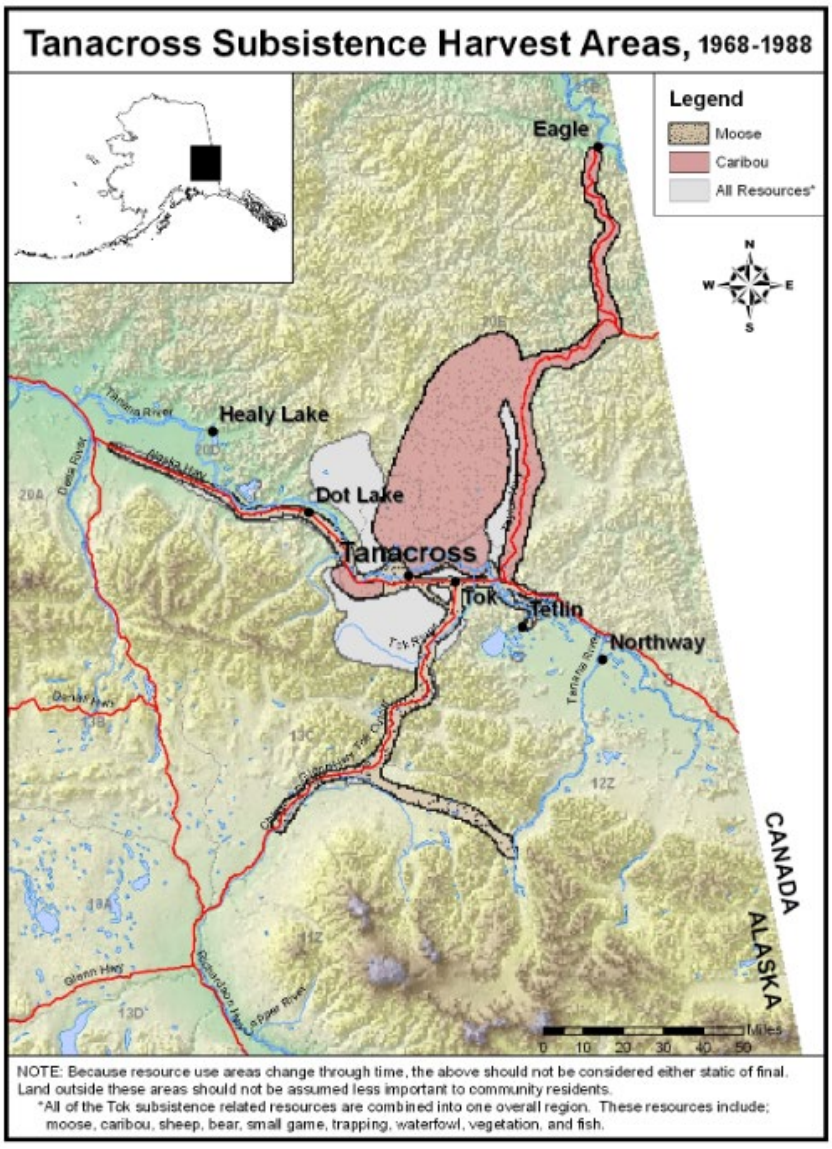


**Figure 5.** Tanacross' documented search area for caribou and other resources, 1968-1988 (Marcotte 1991, in Koskey 2007).

*Tetlin*

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

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

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

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

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

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

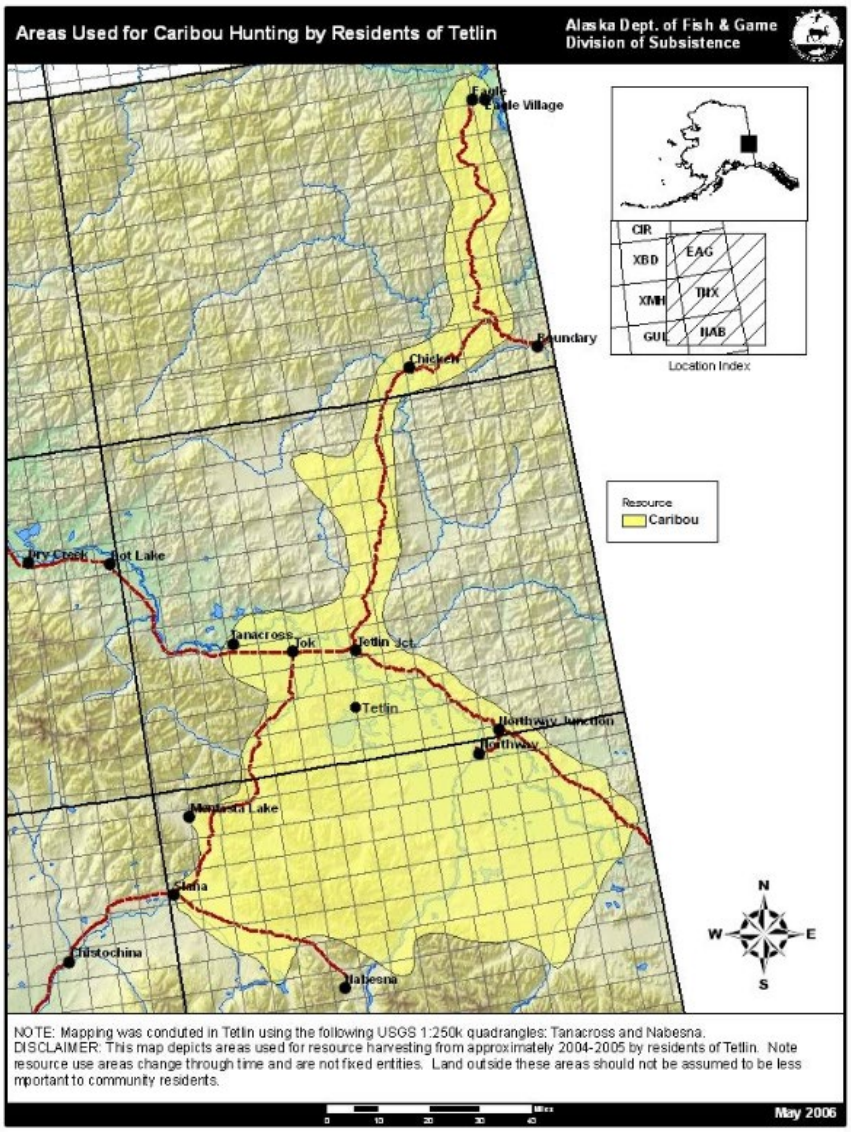


**Figure 6**. Tetlin's documented search area for caribou, 2004 (Koskey 2007).

*Tok*

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

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

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

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

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

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

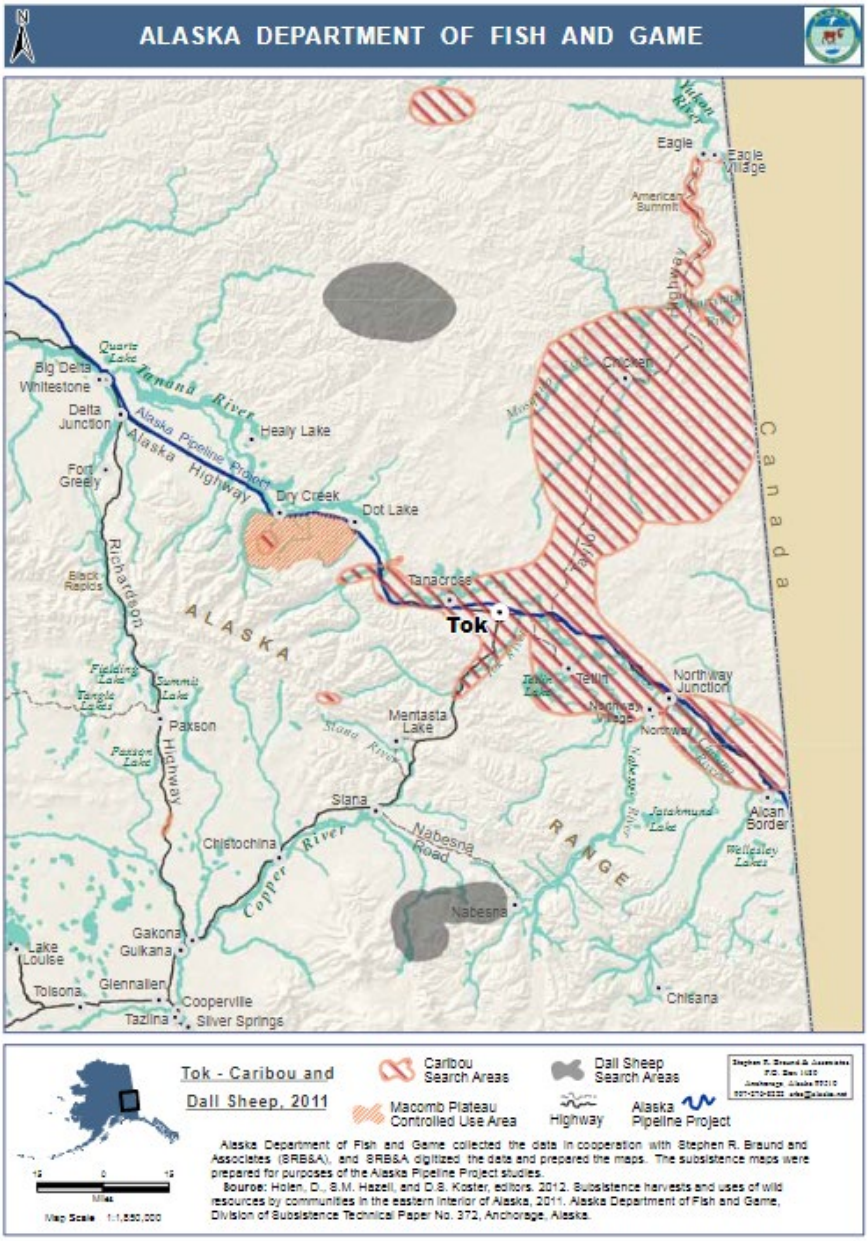


**Figure 7**. Tok's documented search area for caribou (and sheep), 2011 (Holen et al. 2012).

*Alcan Border*

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

*Glacier View and Sheep Mountain*

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

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

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

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

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

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

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

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

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

*Lake Louise*

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

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

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

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

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

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

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

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

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

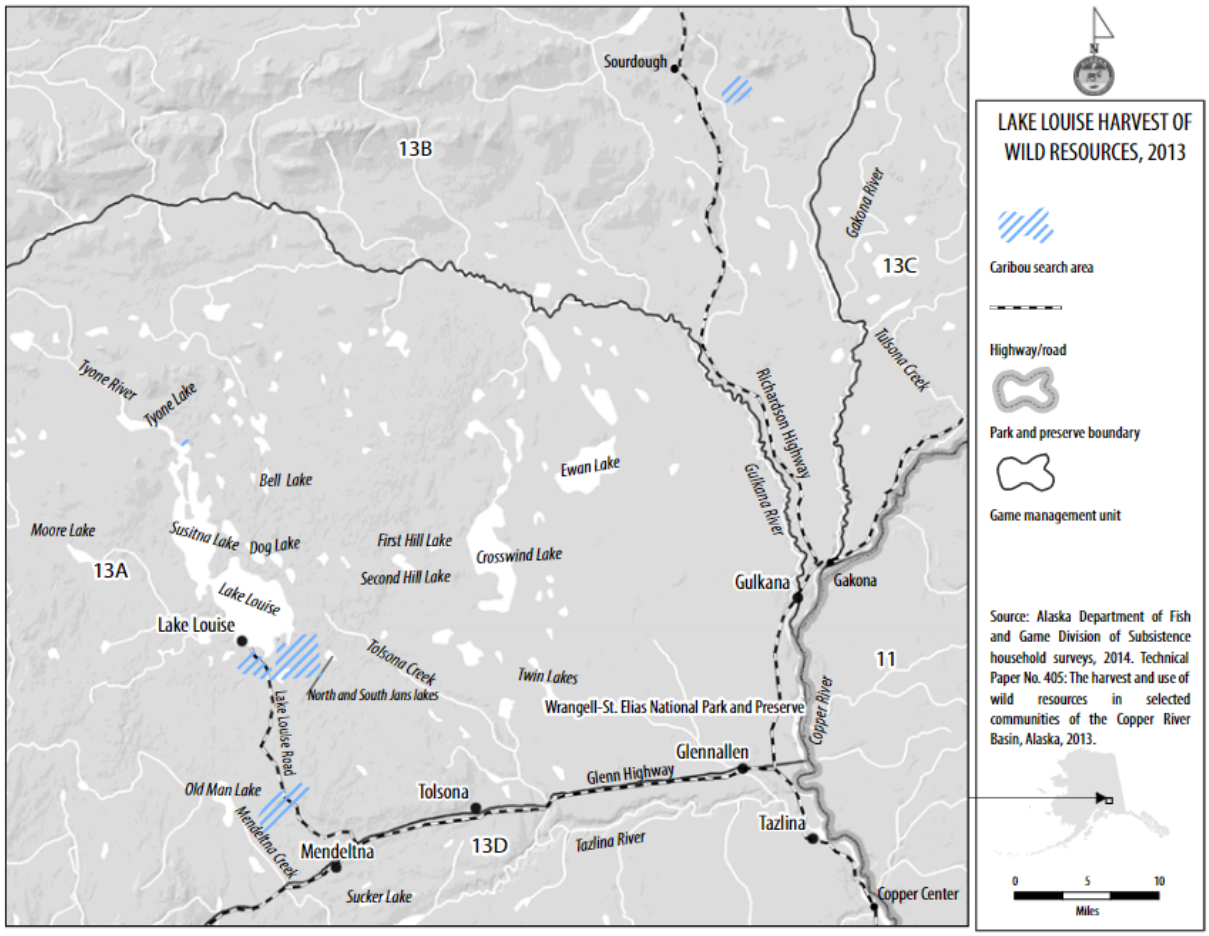


**Figure 8**. Lake Louise's documented search area for caribou, 2013 (Holen et al. 2015).

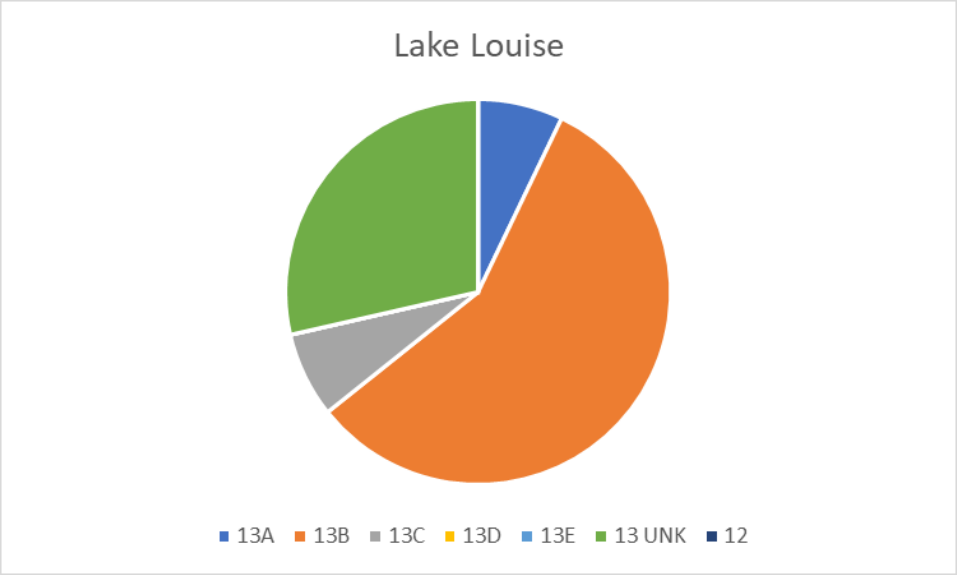


**Figure 9**. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Lake Louise's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-seven percent of Lake Louise's harvest took place in Unit 13B, 29% in an unknown subunit of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

*East Glenn Highway Communities*

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

*Nelchina*

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

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

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

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

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

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

*Mendeltna*

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

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

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

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

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

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

*Tolsona*

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

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

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

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

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

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

*East Glenn Highway Community Search and Use Area*

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

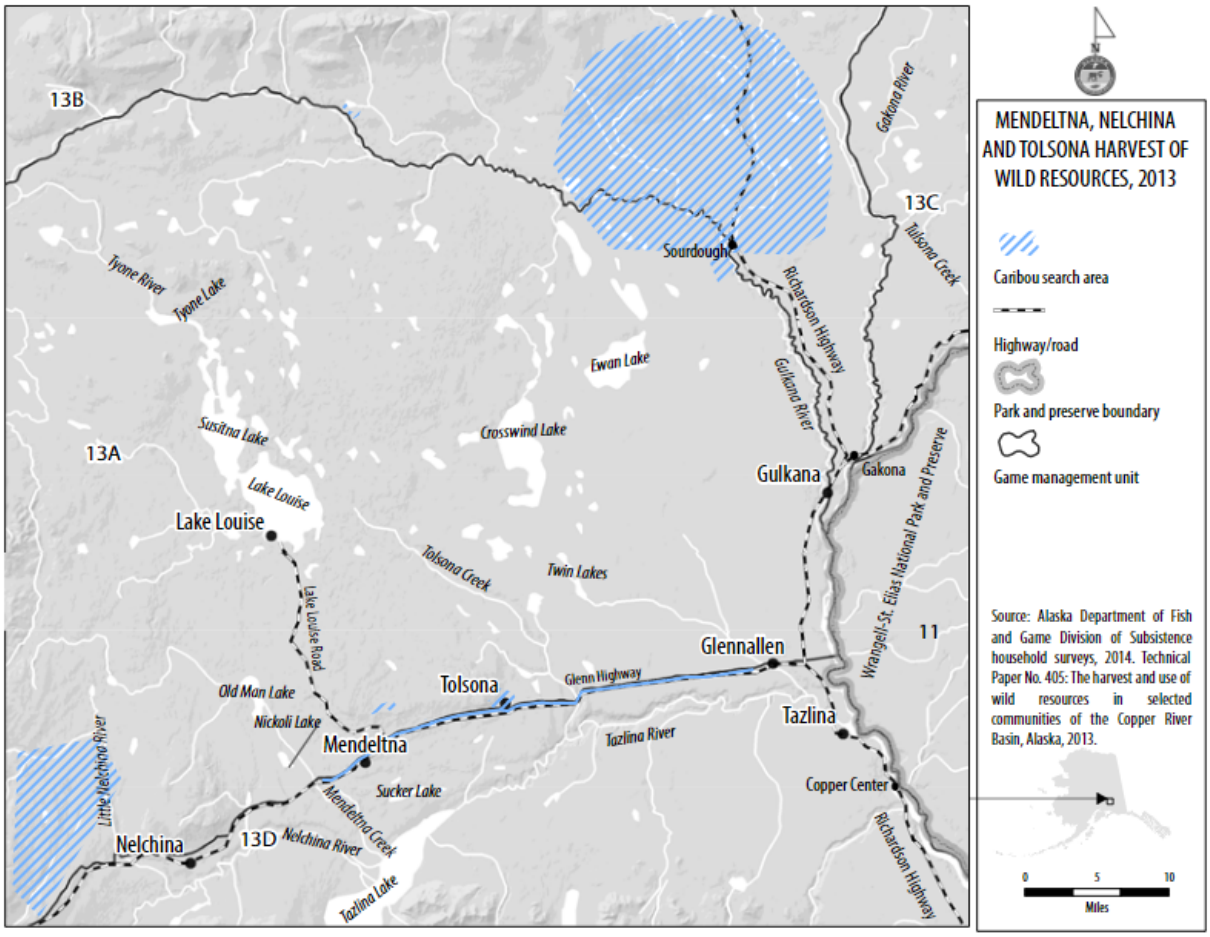


**Figure 10**. Documented search areas documented for residents of Mendeltna, Nelchina, and Tolsona for the 2013 study year (Holen et al. 2015).

*Glennallen*

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

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

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

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

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

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

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

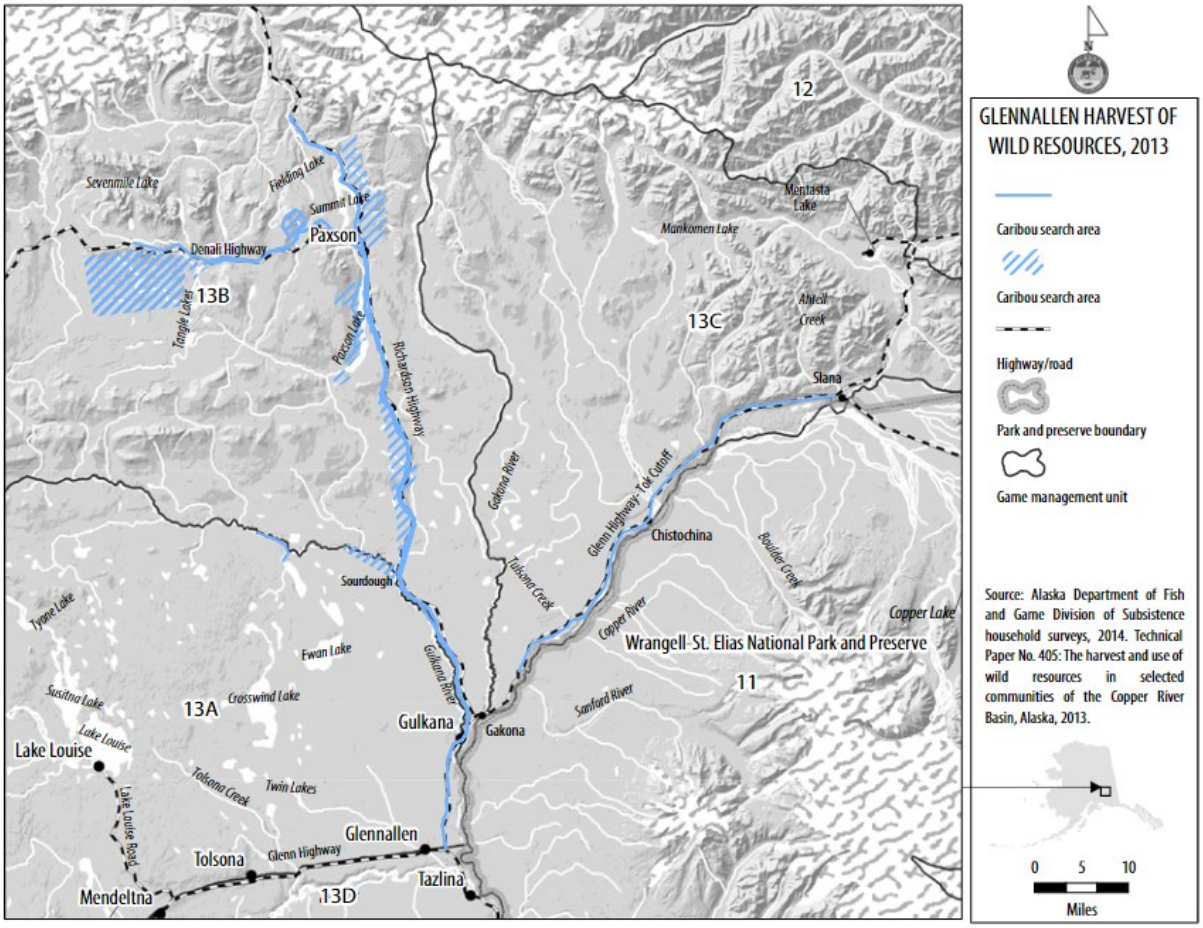


**Figure 11**. Glennallen's search area for caribou, 2013 (Holen et al. 2015).

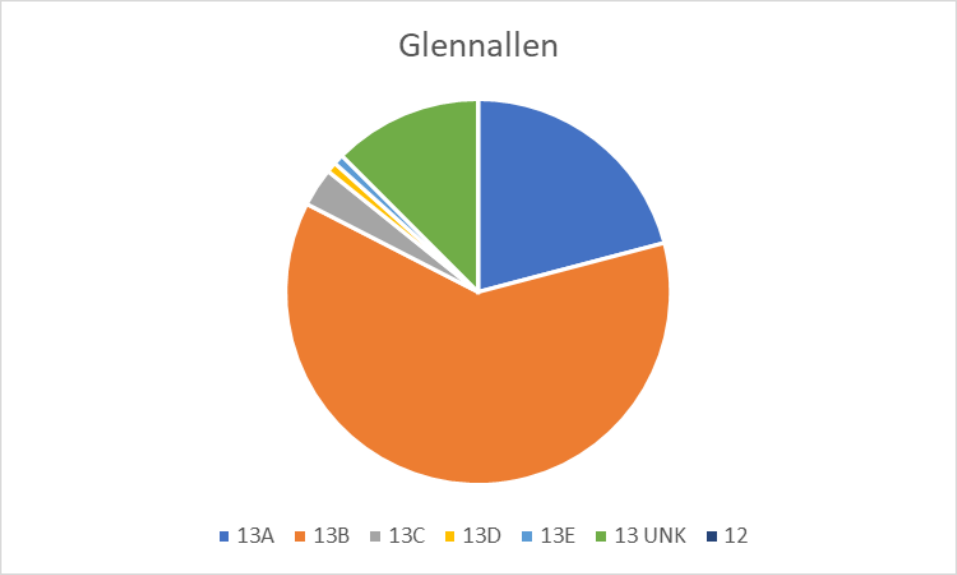


**Figure 12**. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Glennallen's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Sixty-two percent of Glennallen's harvest took place in Unit 13B, 21% in Unit 13A, 13% in an unknown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

*Paxson*

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

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

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

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

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

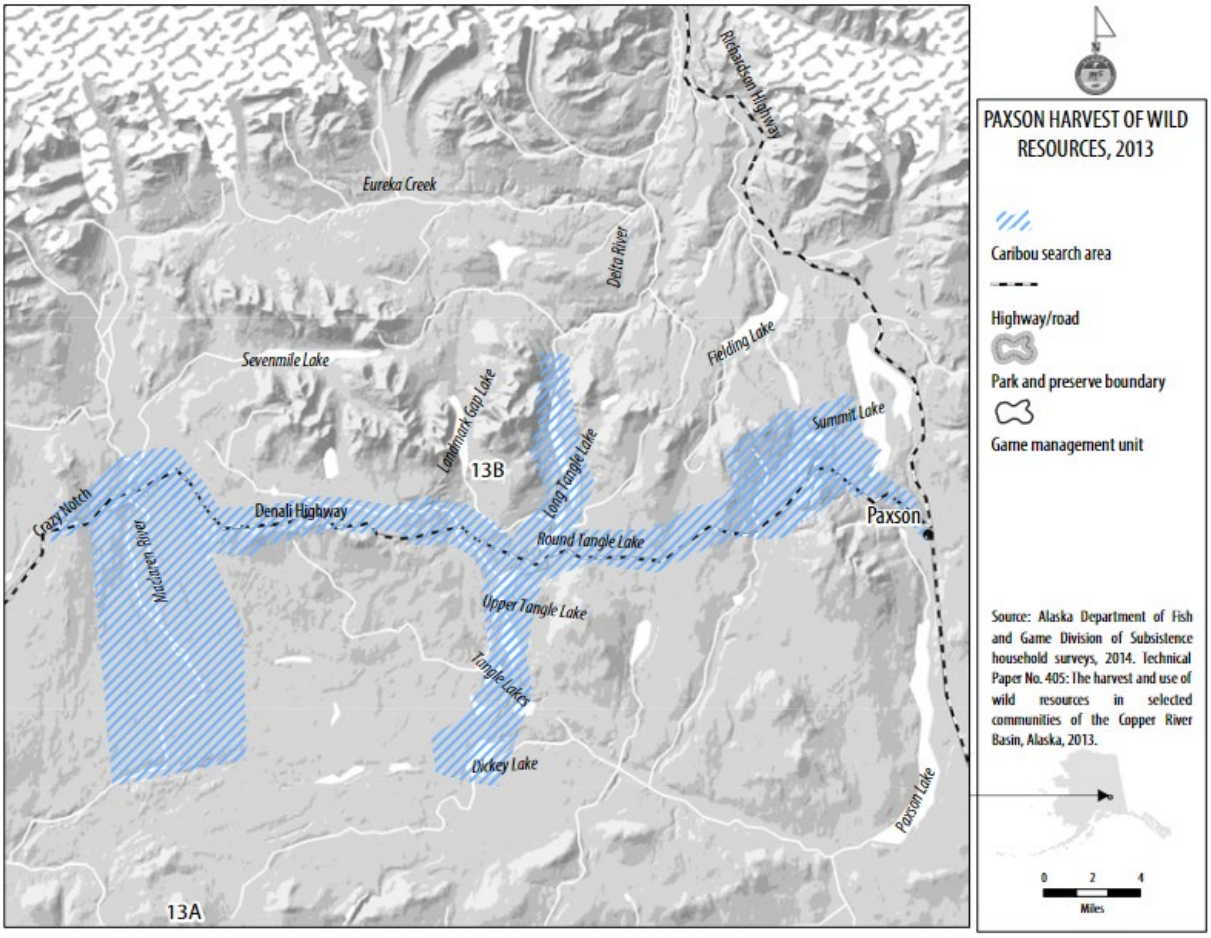


**Figure 13**. Paxson's documented search area for caribou, 2013 (Holen et al. 2015).

*Gulkana*

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

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

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

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

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

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

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

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

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

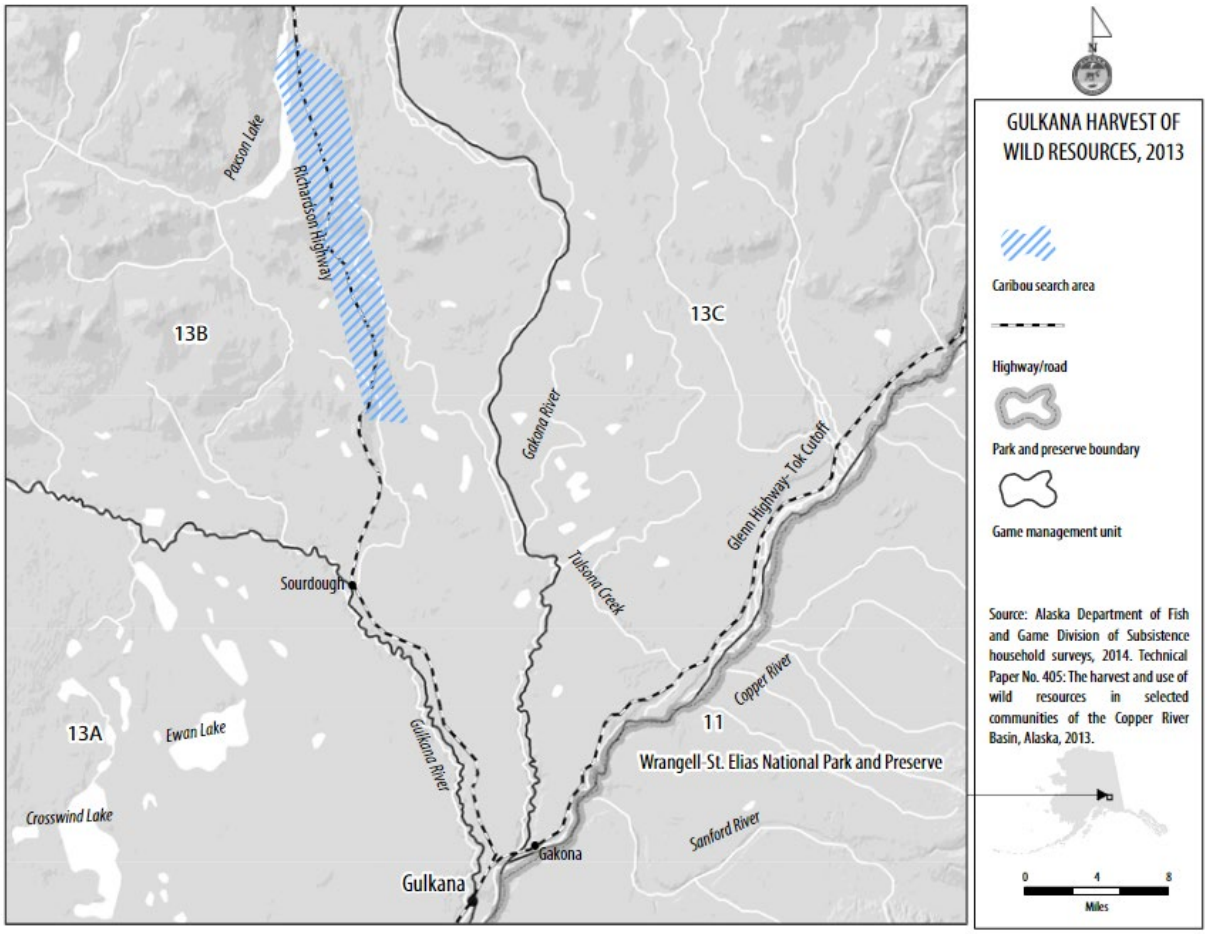


**Figure 14**. Gulkana's documented search area for caribou in 2013 (Holen et al. 2015).

*Chistochina*

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

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

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

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

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

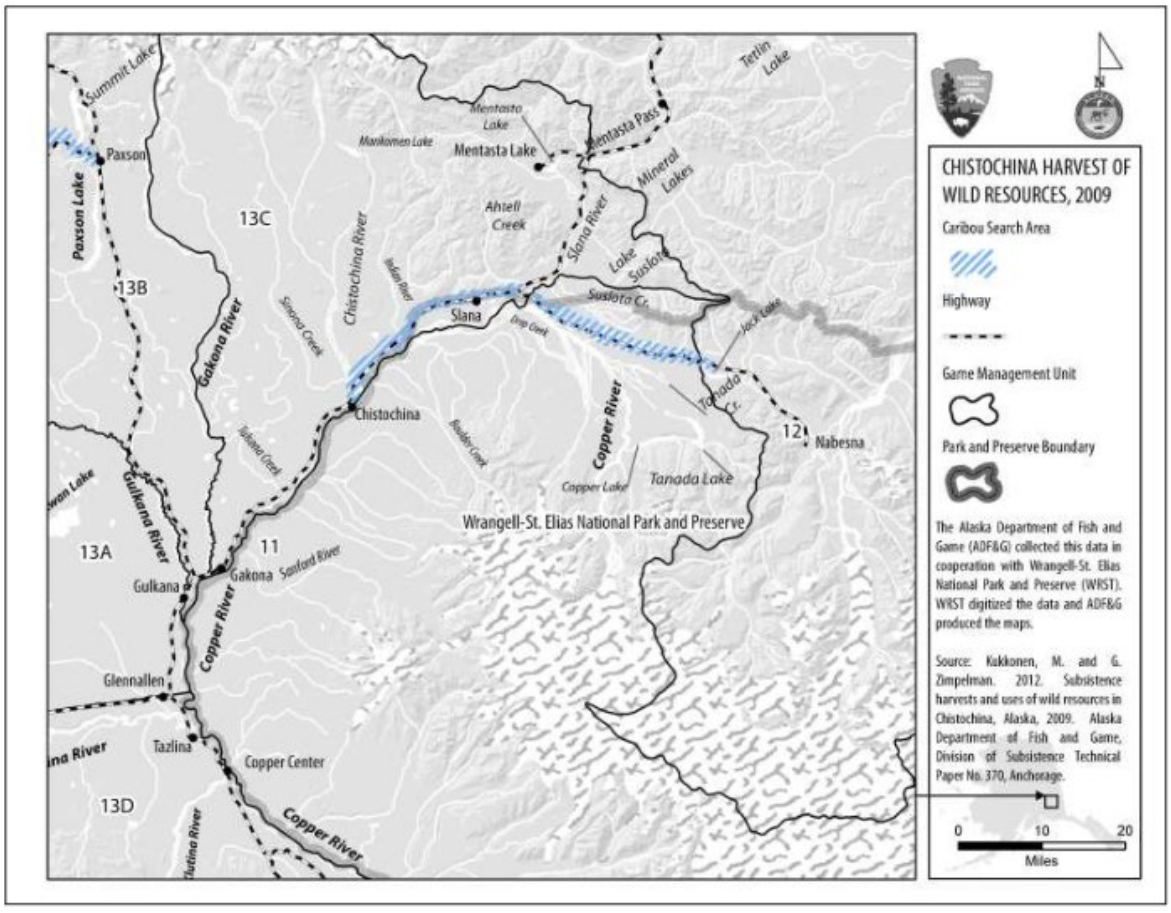


**Figure 15**. Chistochina's documented search area for caribou, 2009 (Kukkonen and Zimpelman 2012).

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

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

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

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

*Gakona*

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

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

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

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

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

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

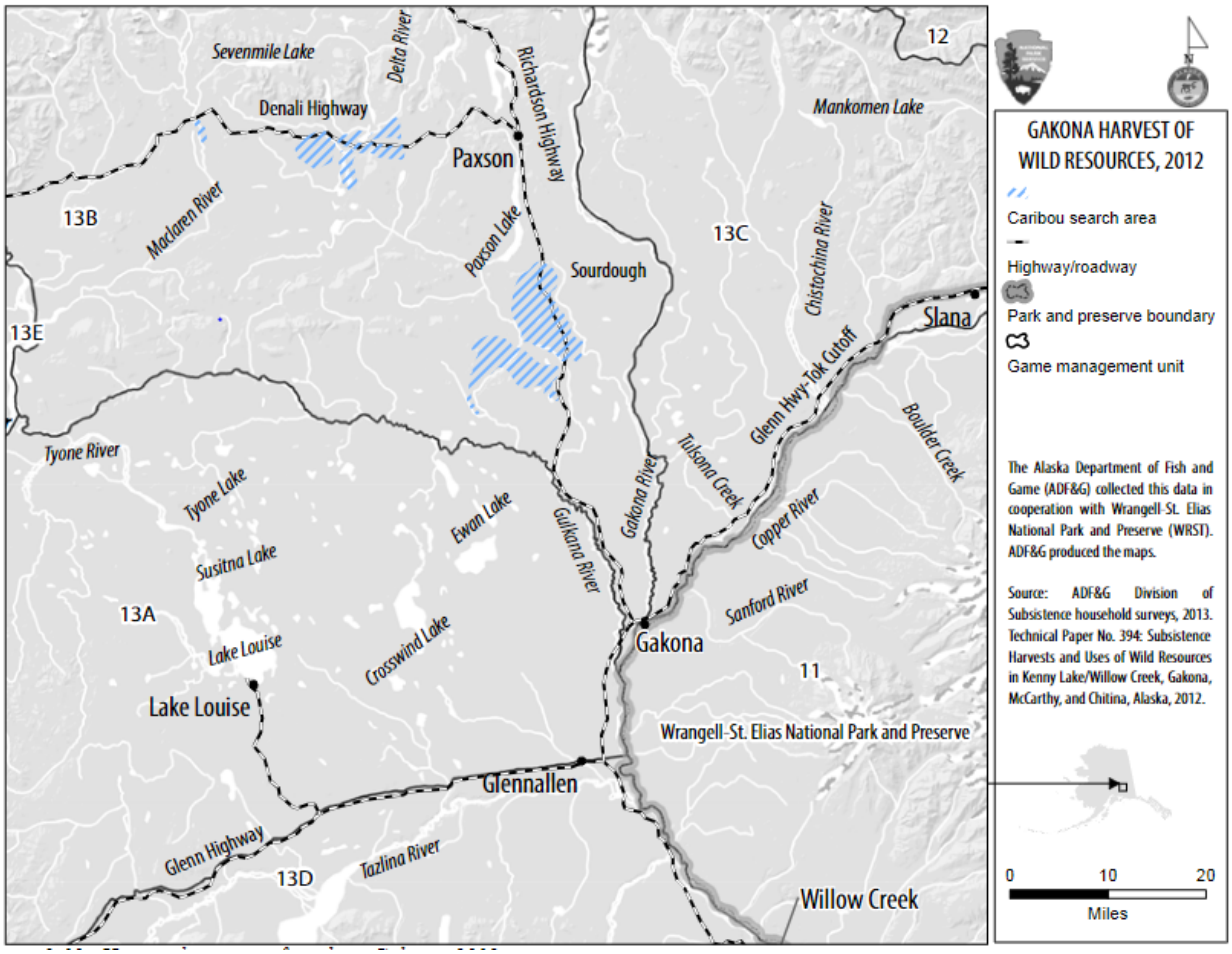


**Figure 16:** Gakona's documented search area for caribou, 2012 (La Vine and Zimpelman 2014).

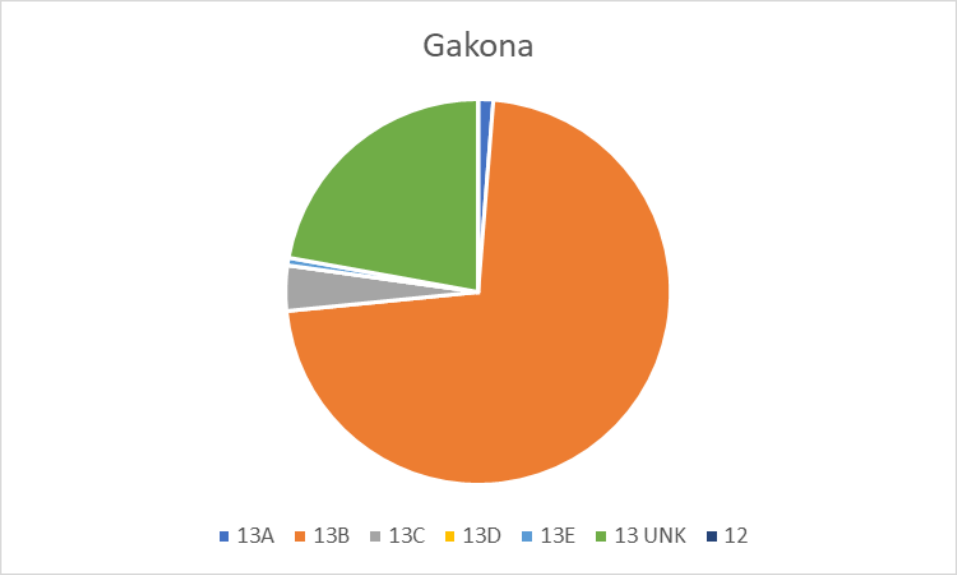


**Figure 17**. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Gakona's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-two percent of Gakona's harvest took place in Unit 13B, 22% in an unknown subunit of Unit 13, 4% in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

*Slana/Nabesna Road*

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

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

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

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

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

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

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

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

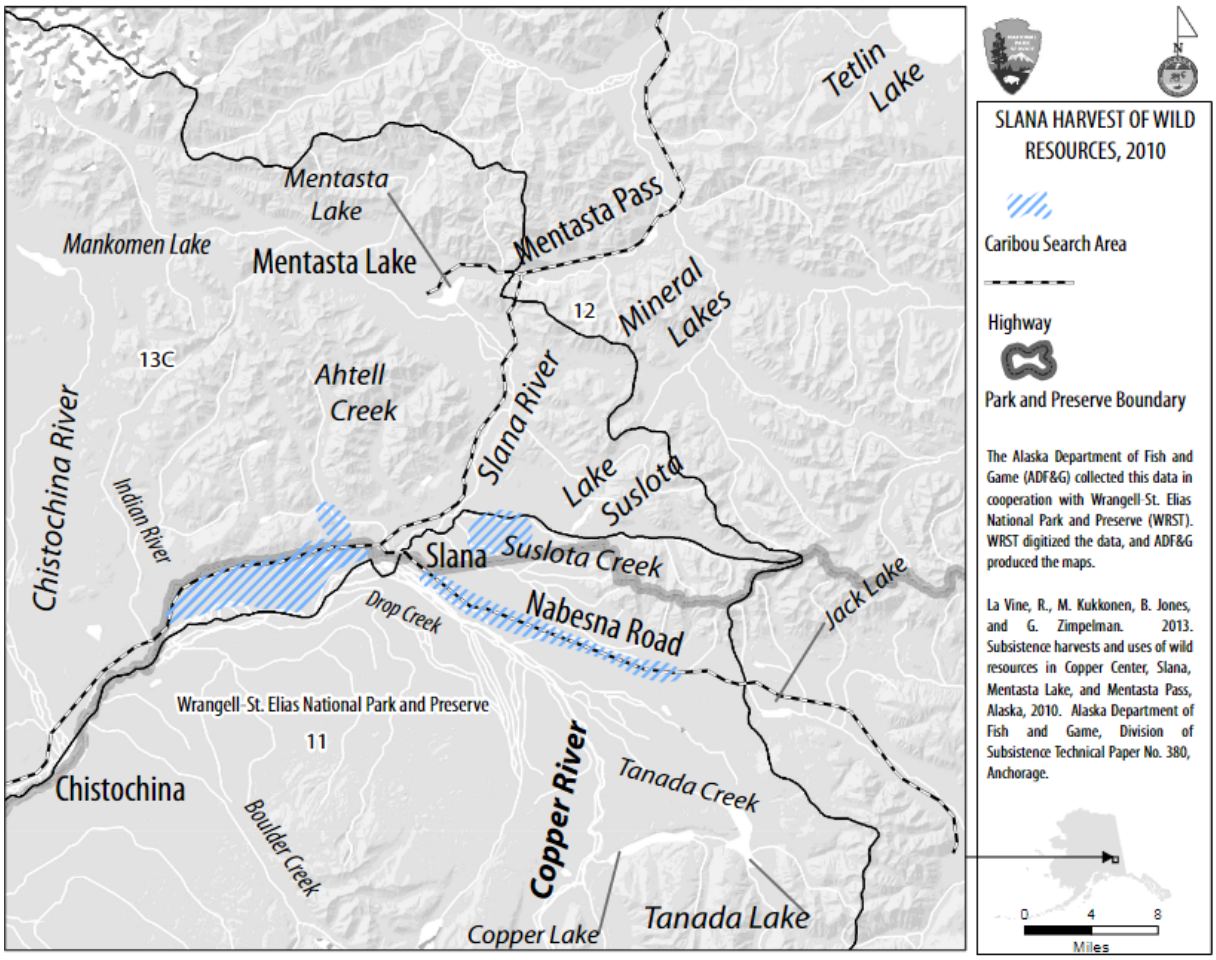


**Figure 18.** Slana/Nabesna Road's documented search area for caribou, 2010 (La Vine et al. 2013). Although the Figure heading indicates that the search areas represented are for "Slana," La Vine et al. (2013) indicate that this also includes Nabesna and Nabesna Rd.

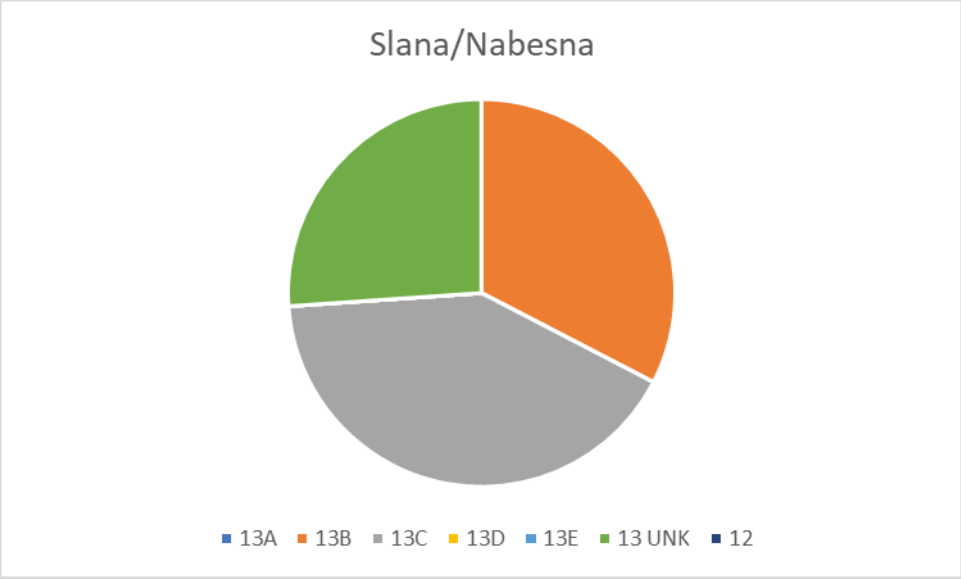


**Figure 19.** For reported caribou harvests within Unit 12 and Unit 13, the percentage of Slana/Nabesna's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Forty-one percent of Slana/Nabesna's harvest took place in Unit 13C, 32% in Unit 13B, and the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

*Chitina*

Chitina is located on the west bank of the Copper River near its confluence with the Chitina River, around mile 34 of the Edgerton Highway (La Vine and Zimpelman 2014). The community is located in Unit 13D, close to the boundary with Unit 11. The Chitina CDP also includes the Strelna area, which is across the Copper River in Unit 11 and was surveyed along with Chitina in the 2012 survey effort. The important Lower Ahtna Athabascan settlement of Taral was located near this area, as were additional Ahtna camps, but Chitina itself developed around copper mining at Kennecott and was connected to Cordova by railroad (La Vine and Zimpelman 2014). Chitina's population declined after the Kennecott mine was closed but has subsequently grown slowly (La Vine and Zimpelman 2014). In 2022, the estimated population of Chitina was 97 (ADLWD 2022).

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

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

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

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

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

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

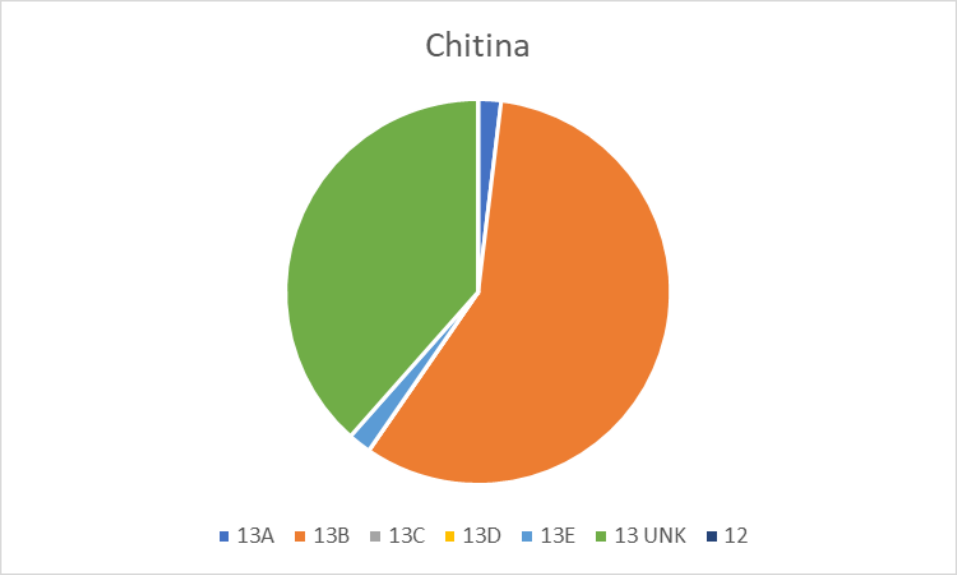


**Figure 20**. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Chitina's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-eight percent of Chitina's harvest took place in Unit 13B, 38% in an unknown subunit of Unit 13,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

*Copper Center/Silver Springs*

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

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

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

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

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

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

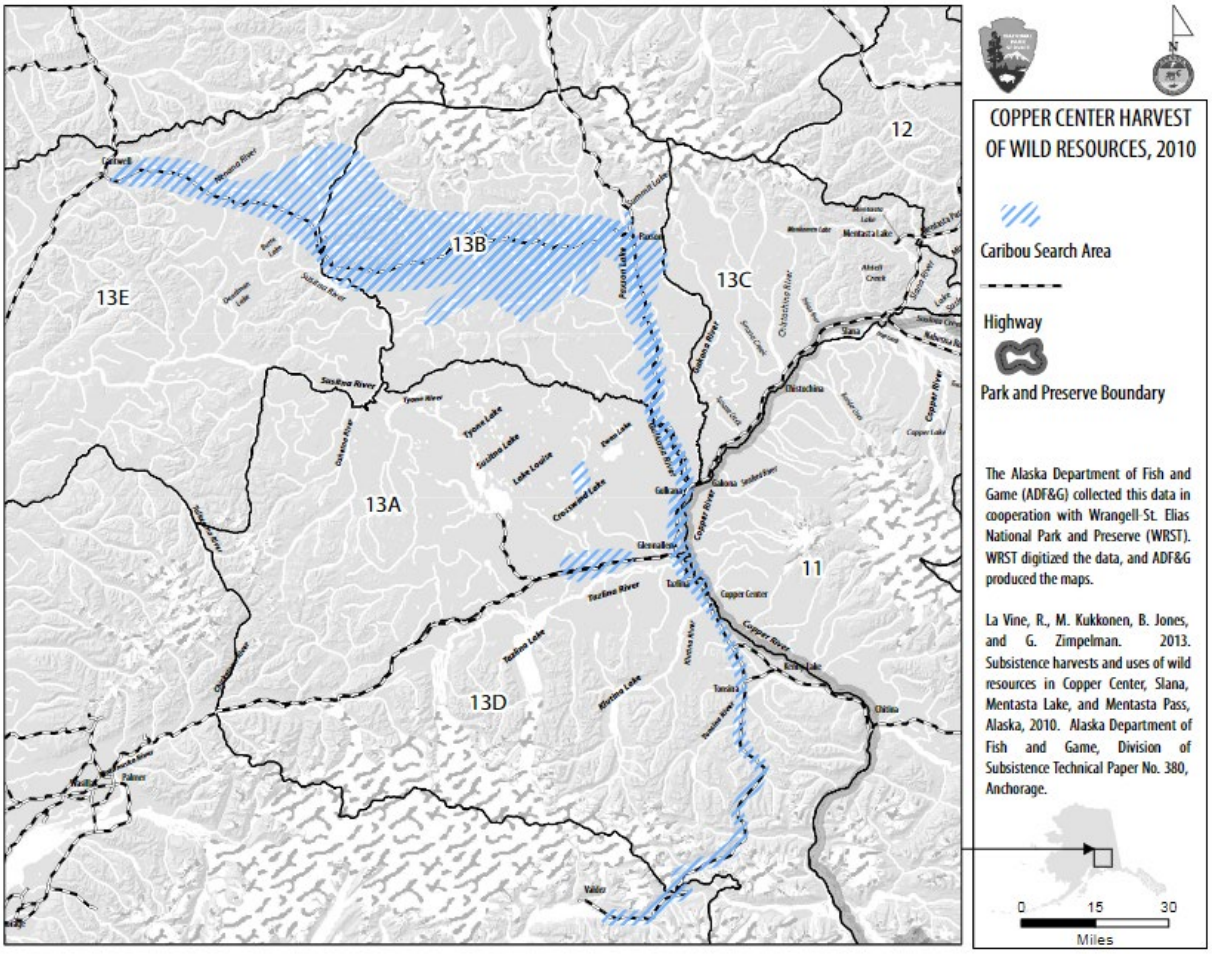


**Figure 21**. Copper Center/Silver Spring's documented caribou search areas, 2010 (La Vine et al. 2013).

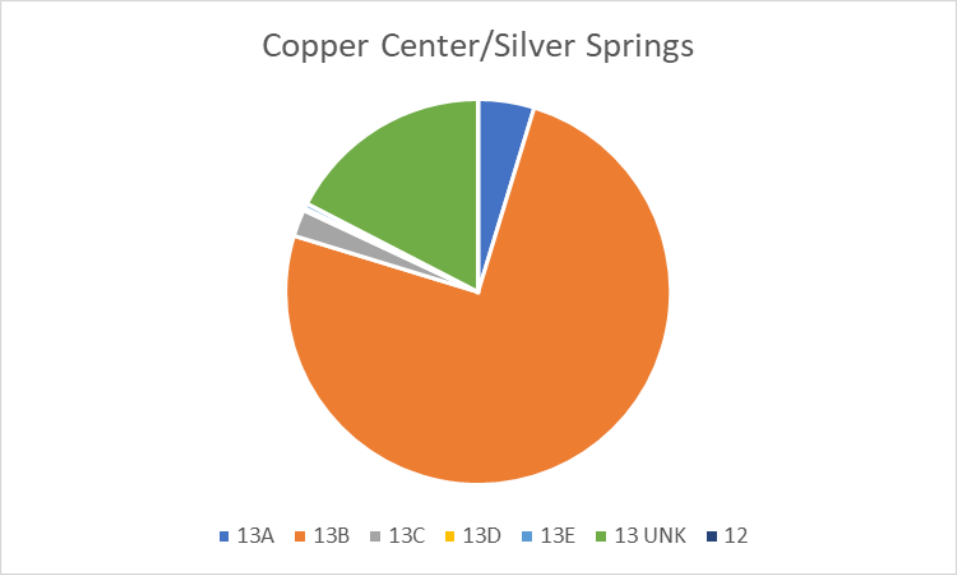


**Figure 22**. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Copper Center/Silver Spring's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-five percent of harvest took place in Unit 13B, 17% in an unknown subunit of Unit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

*Kenny Lake and Willow Creek*

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

Kenny Lake/Willow Creek is located in the Lower Ahtna area, near its boundary with the Central Ahtna area to the north (Simeone 2006). Ahtna settlements existed in this area, but the contemporary community of Kenny Lake was settled by homesteaders beginning in the 1950s (La Vine and Zimpelman 2014). Willow Creek CDP was established in 2000 and incorporated portions of the previous Kenny Lake CDP as well as part of the area bordering the Copper Center CDP (La Vine and Zimpelman 2014). In 2022, the estimated population of Kenny Lake CDP was 294, and the estimated population of Willow Creek CDP was 193, for a combined population of 487 (ADLWD 2022).

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

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

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

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

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

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

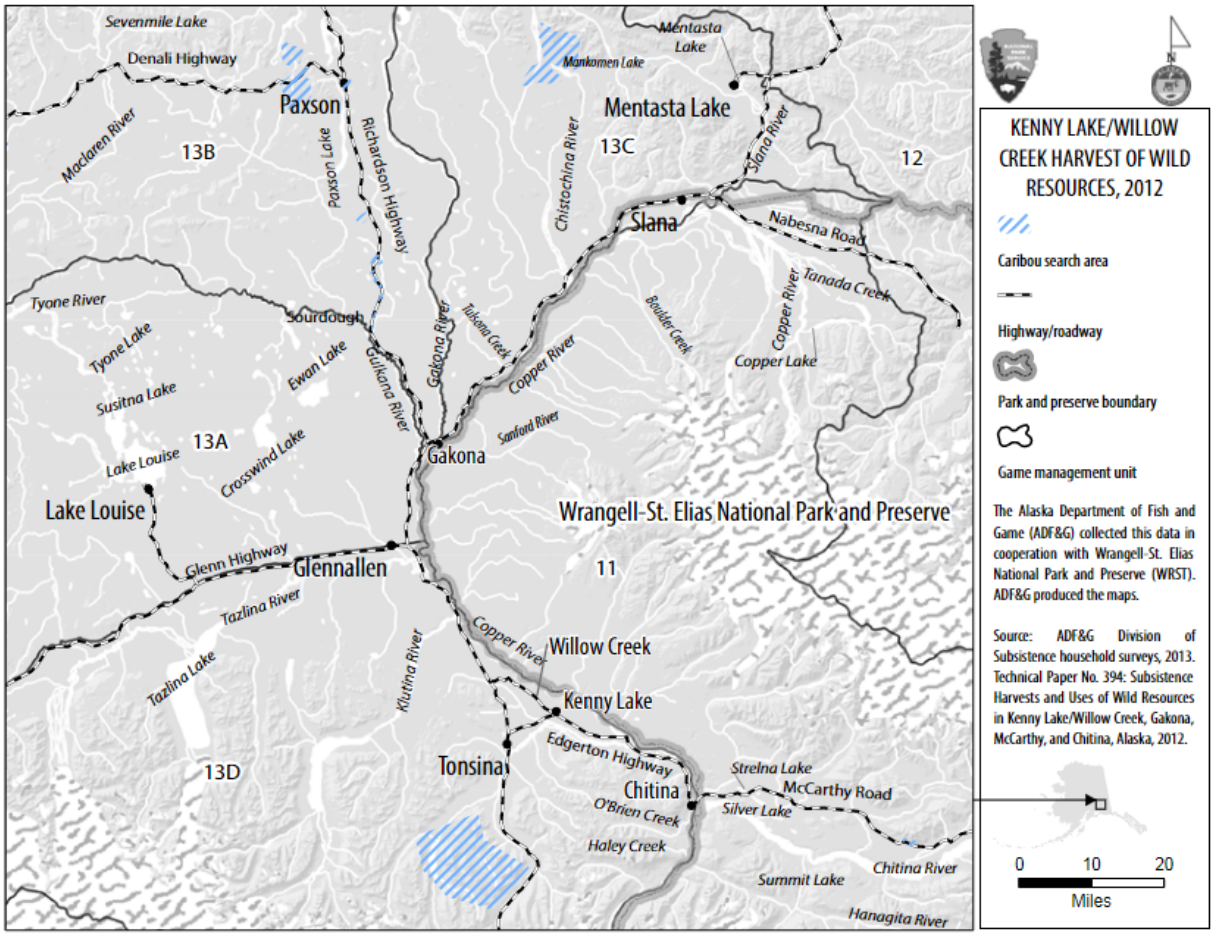


**Figure 23.** Kenny Lake's documented search area for caribou, 2012 (La Vine and Zimpelman 2014).

*Tazlina*

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

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

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

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

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

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

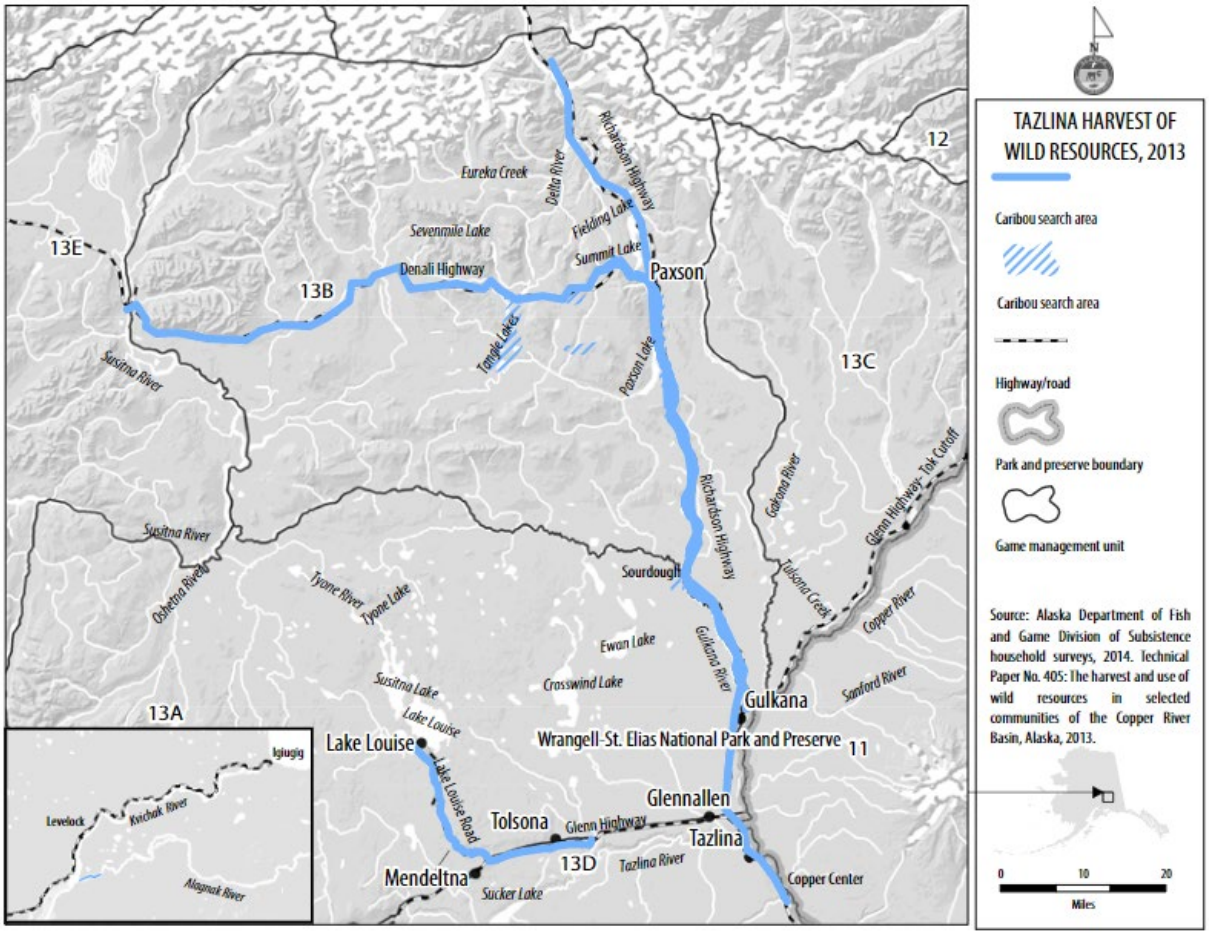


**Figure 24**. Tazlina's documented search area for caribou, 2013 (Holen et al. 2015).

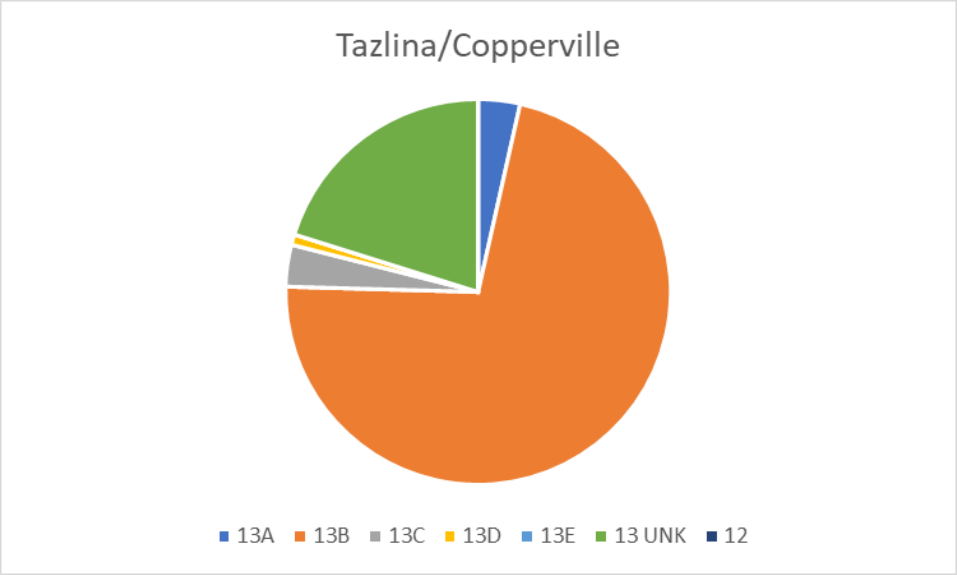


**Figure 25**. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Tazlina/Copperville's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-two percent of Tazlina/Copperville's harvest occurred in Unit 13B; 20% took place in an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

*Tonsina*

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

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

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

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

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

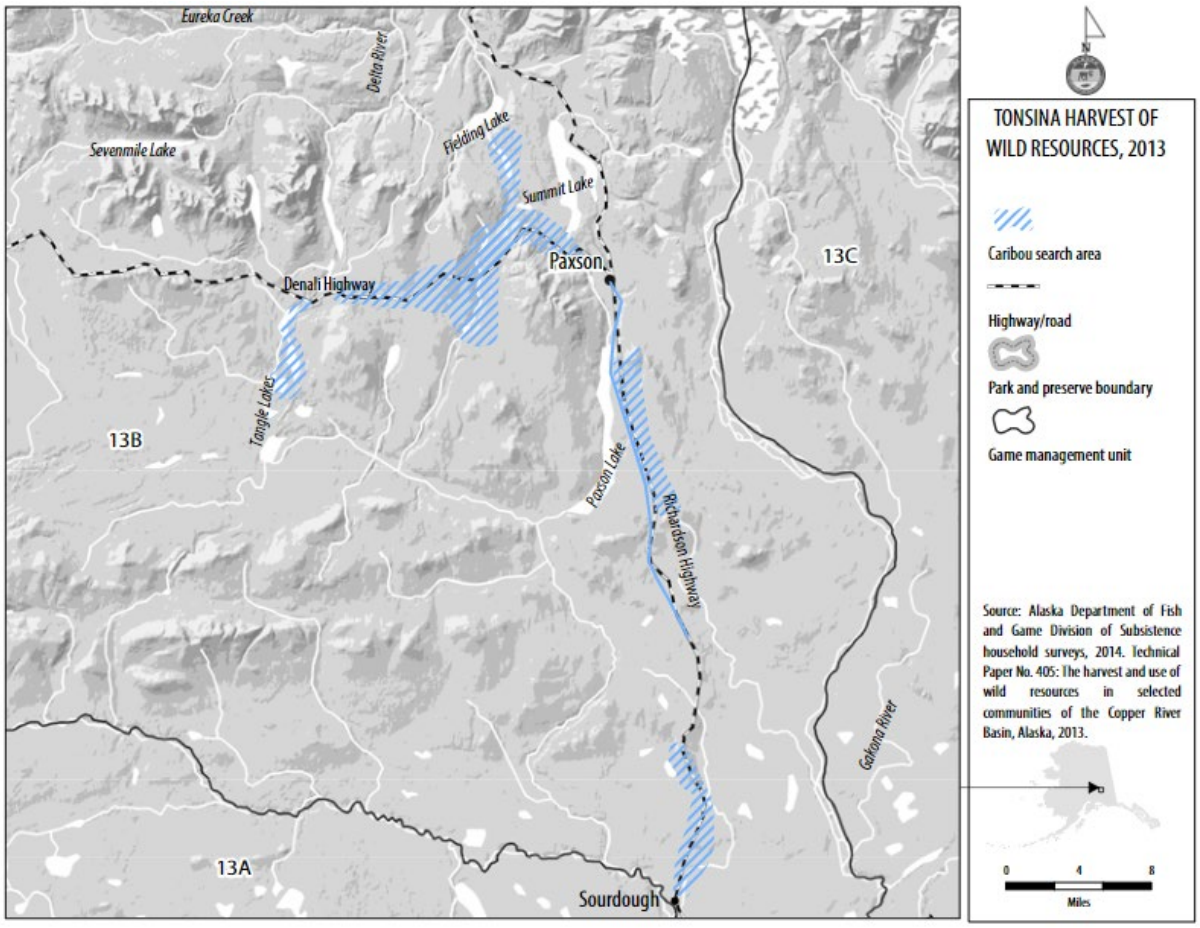


**Figure 26**. Tonsina's documented search areas for caribou, 2013 (Holen et al. 2015).

*Cantwell*

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

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

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

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

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

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

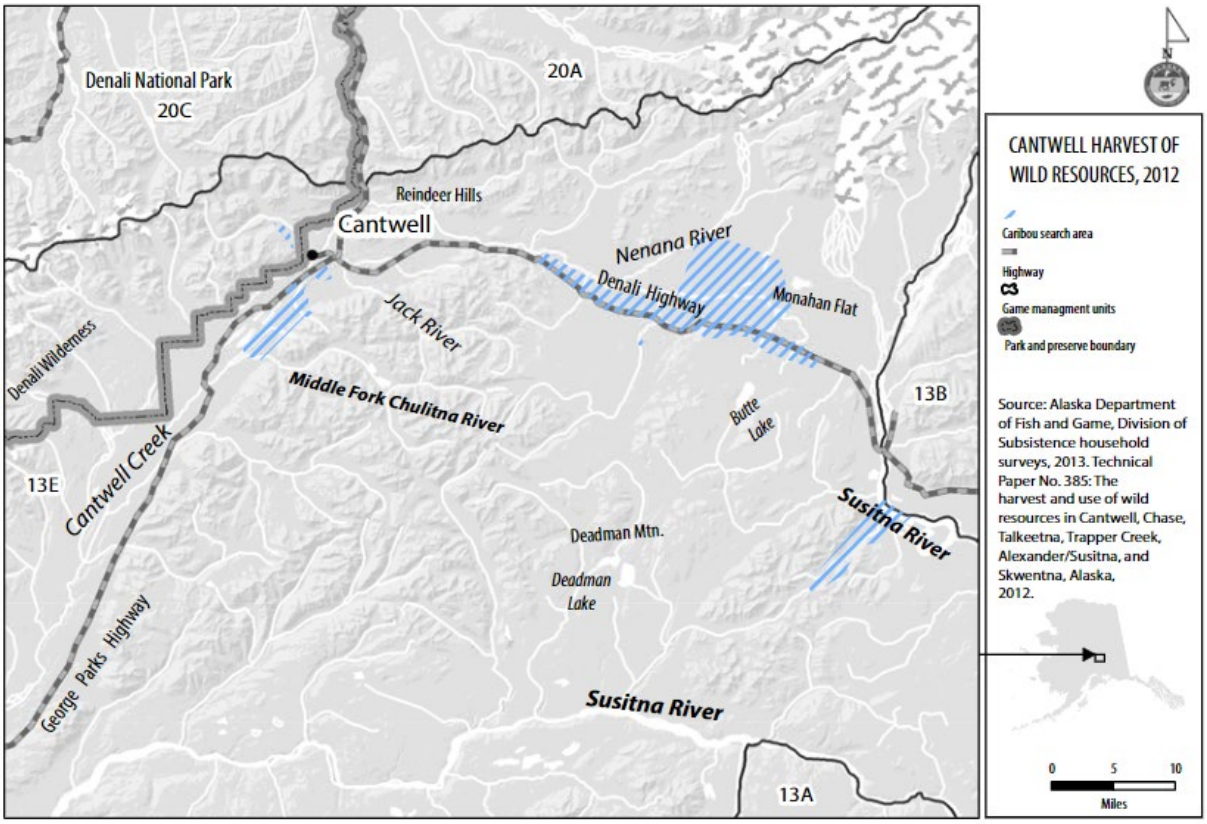


**Figure 27**. Cantwell's documented search areas for caribou, 2012 (Holen et al. 2014).

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

*Chase*

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

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

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

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

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

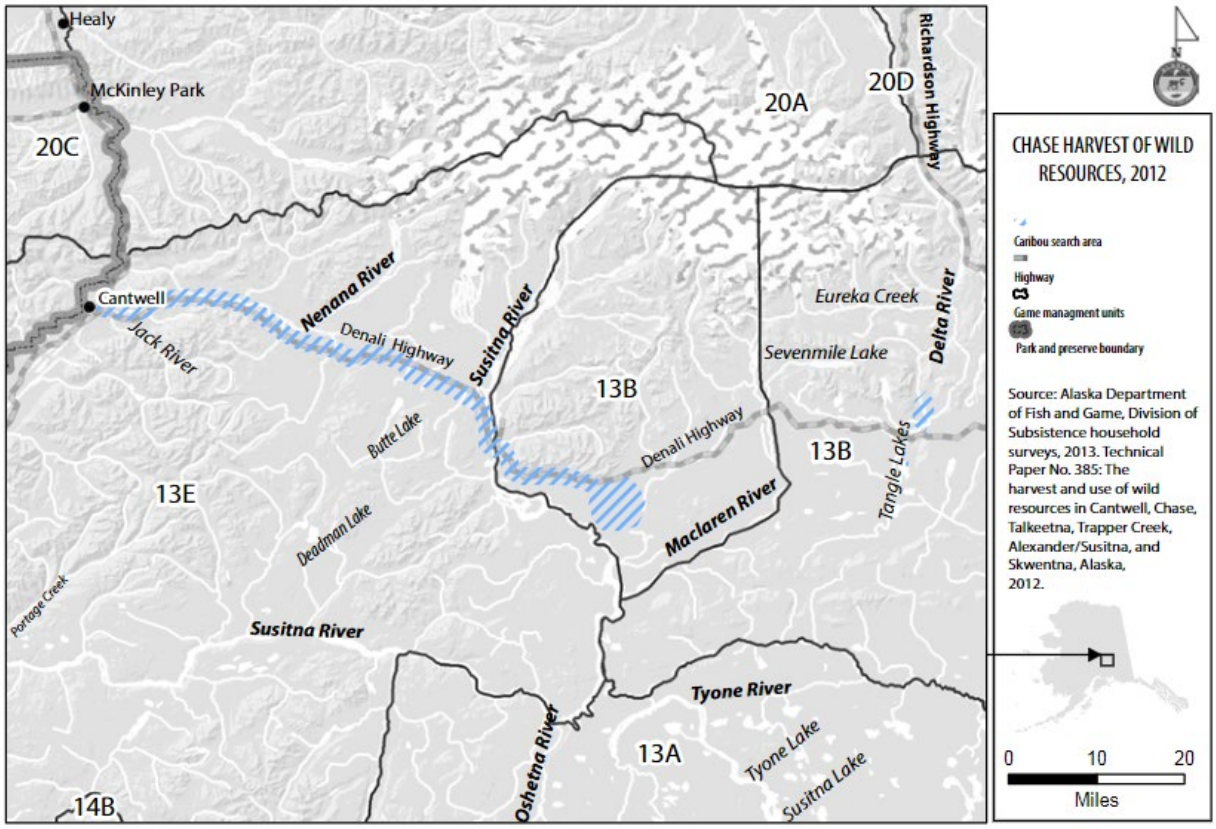


**Figure 28**. Chase's documented search areas for caribou, 2012 (Holen et al. 2014).

*Chickaloon*

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

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

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

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

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

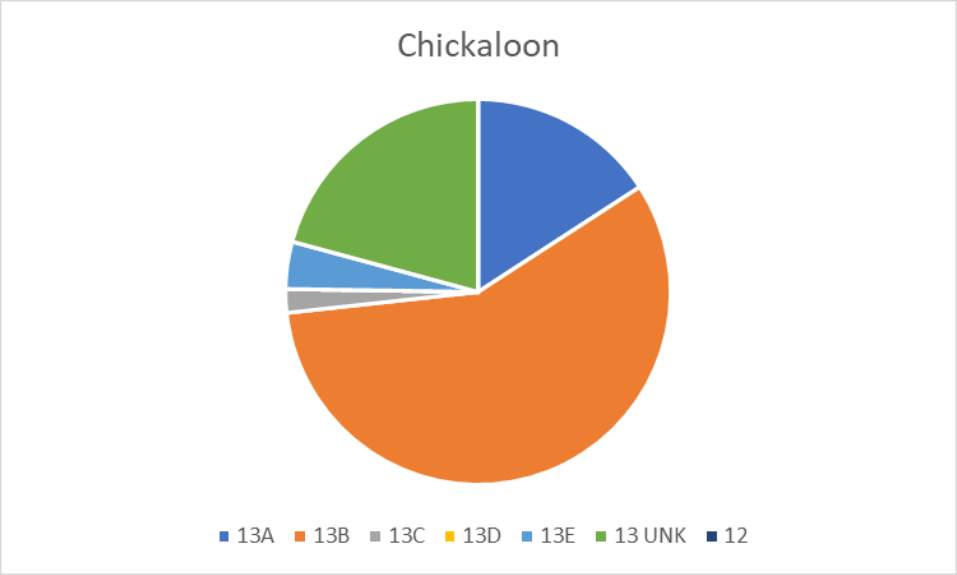


**Figure 29.** For reported caribou harvests within Unit 12 and Unit 13, the percentage of Chickaloon's total harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Fifty-seven percent of Chickaloon's harvests occurred in Unit 13B, 21% took place in an unknown sub-unit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

*Denali Park CDP*

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

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

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

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

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

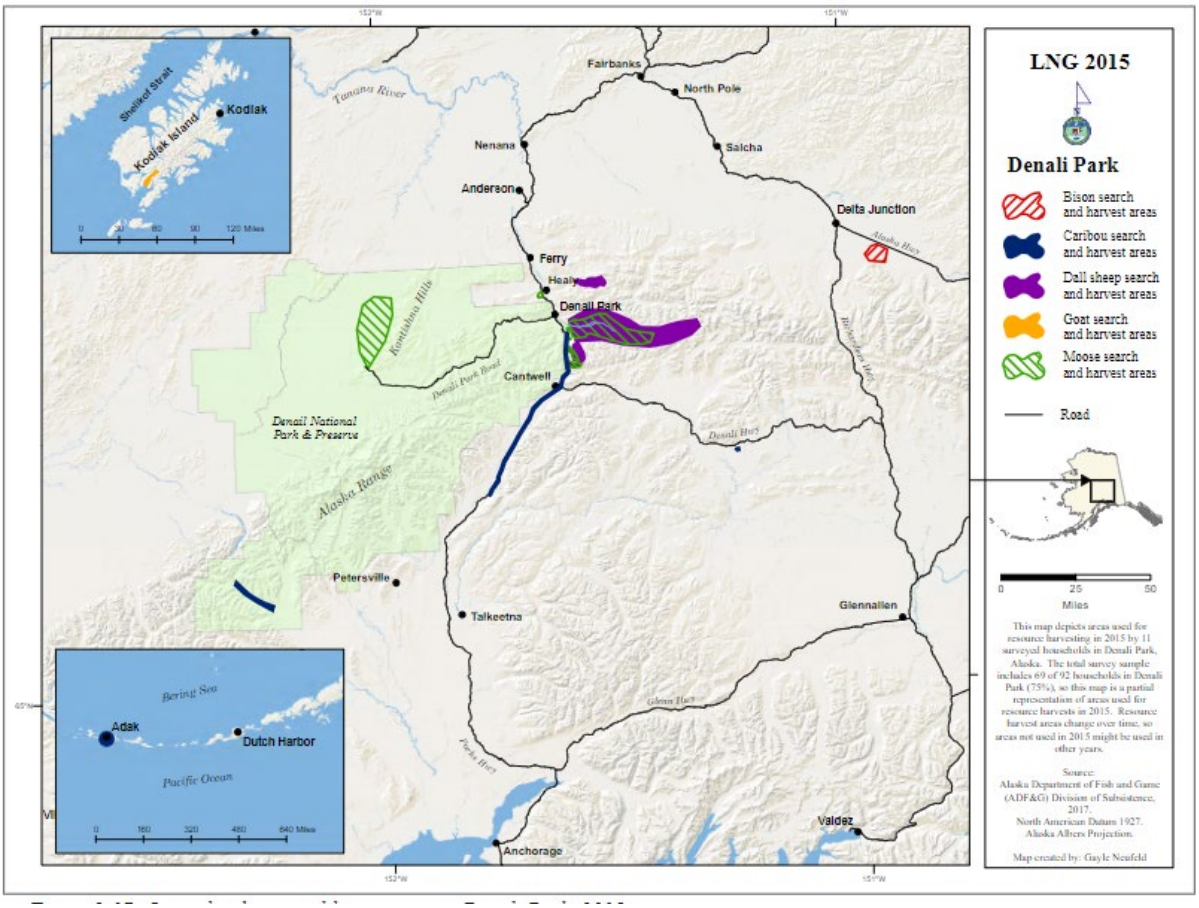


**Figure 30**. Denali Park's documented search area for caribou and other species, 2015 (Brown et al. 2017).

*Delta Junction, Deltana, and Big Delta*

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

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

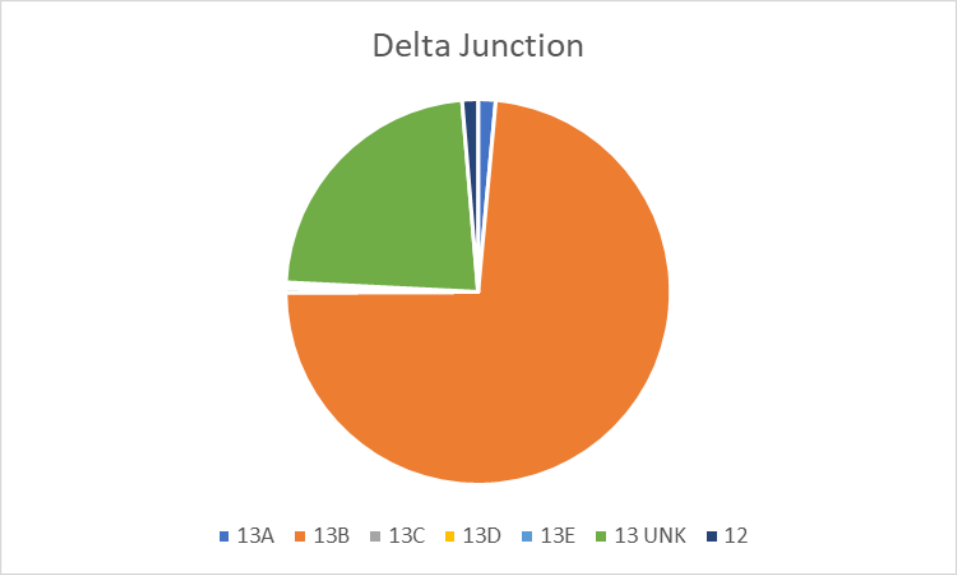


**Figure 31**. For reported caribou harvests within Unit 12 and Unit 13, the percentage of Delta Junction's harvest (both State and Federal) between 2014 and 2022 that occurred in each subunit or unit. Seventy-three percent of harvest took place in Unit 13B, 23% in an unknown subunit of Unit 13, and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

*Dot Lake*

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

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

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

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

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

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

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

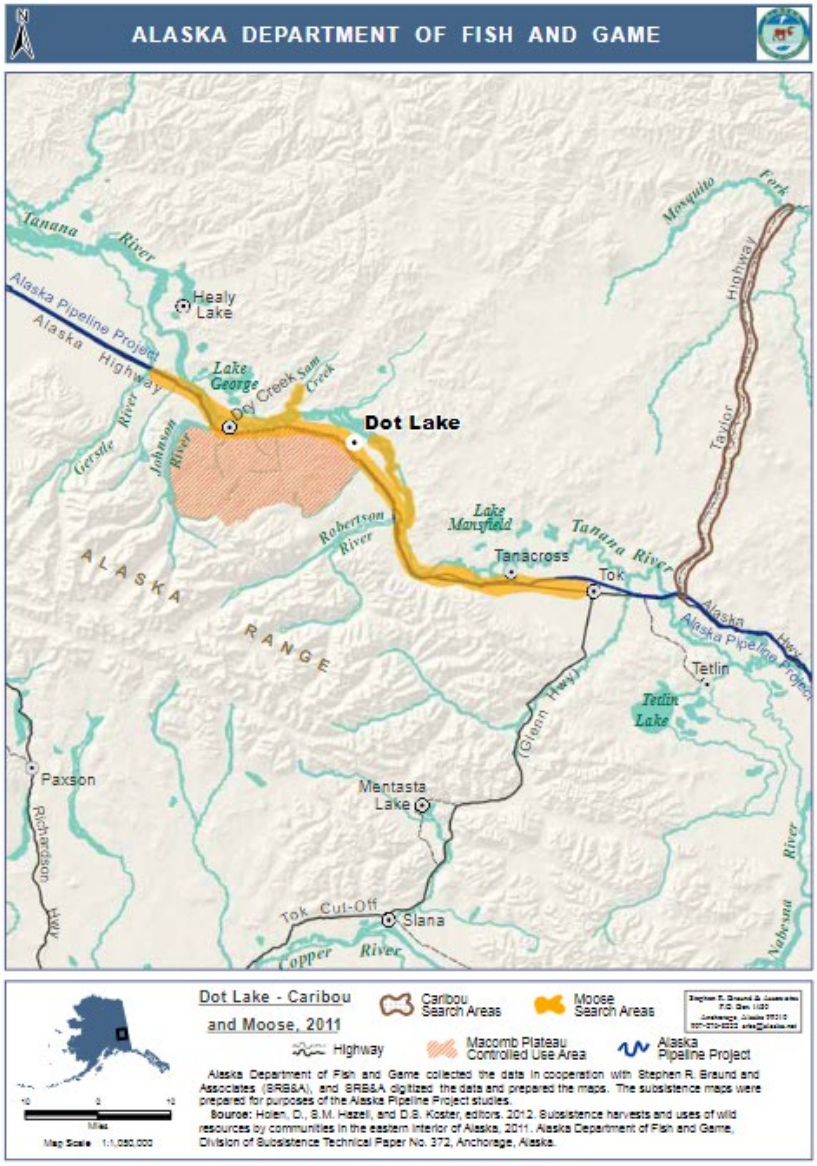


**Figure 32**. Dot Lake's documented search areas for caribou, 2011 (Holen et al. 2012).

*Dry Creek*

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

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

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

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

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

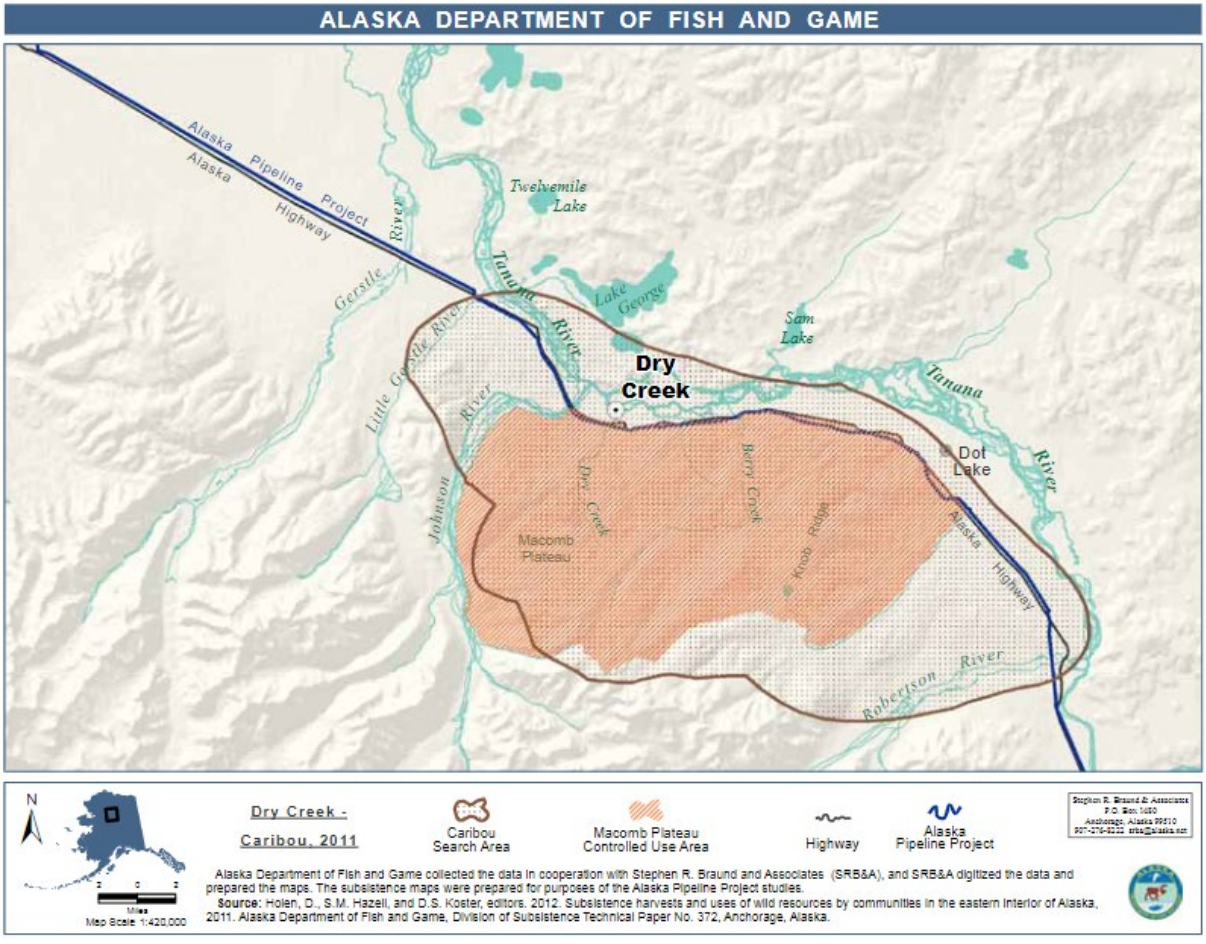


**Figure 33**. Dry Creek's documented search area for caribou, 2011 (Holen et al. 2012).

*Healy Lake*

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

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

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

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

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

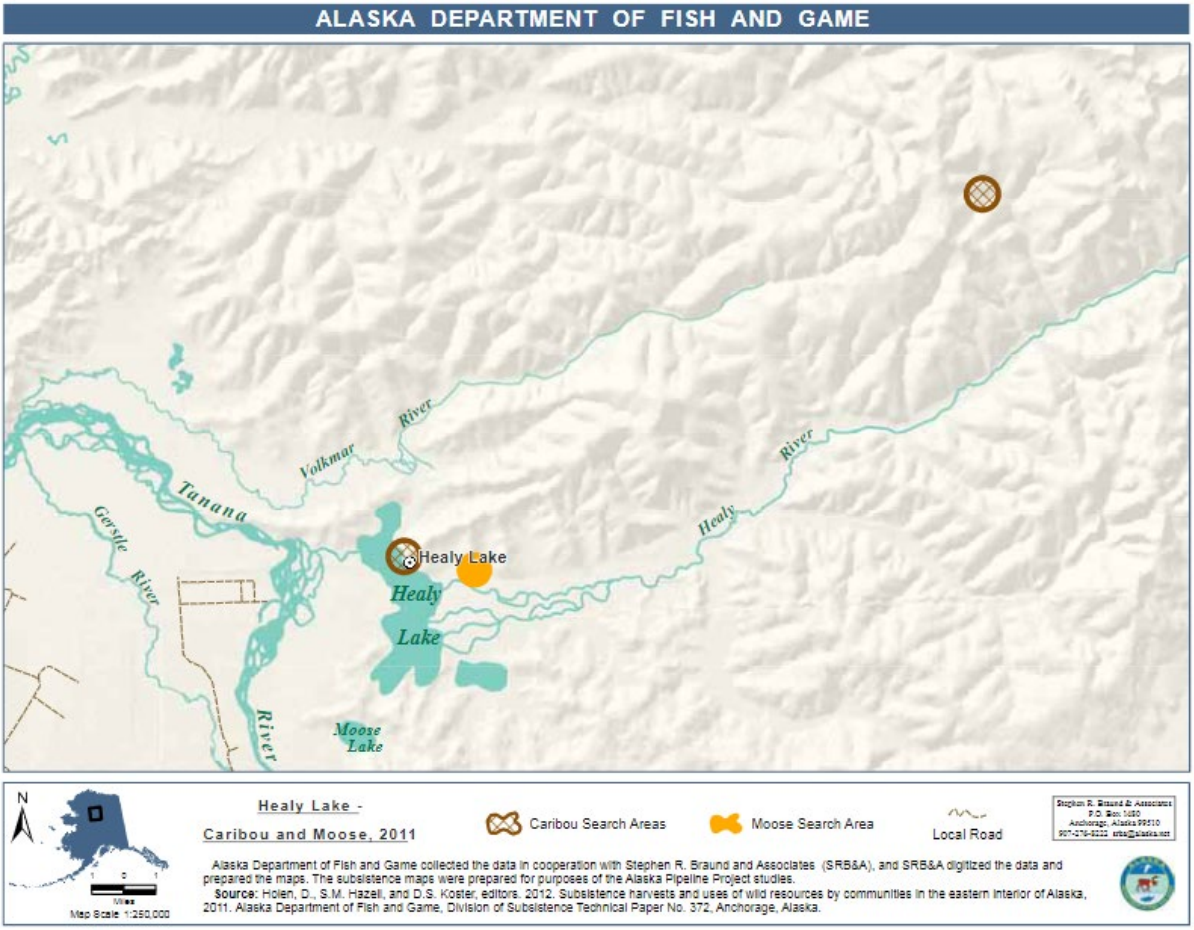


**Figure 34**. Healy Lake's documented search areas for caribou (and moose), 2011 (Holen et al. 2012).

Local Residency

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

*Units 13A and 13D*

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

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

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

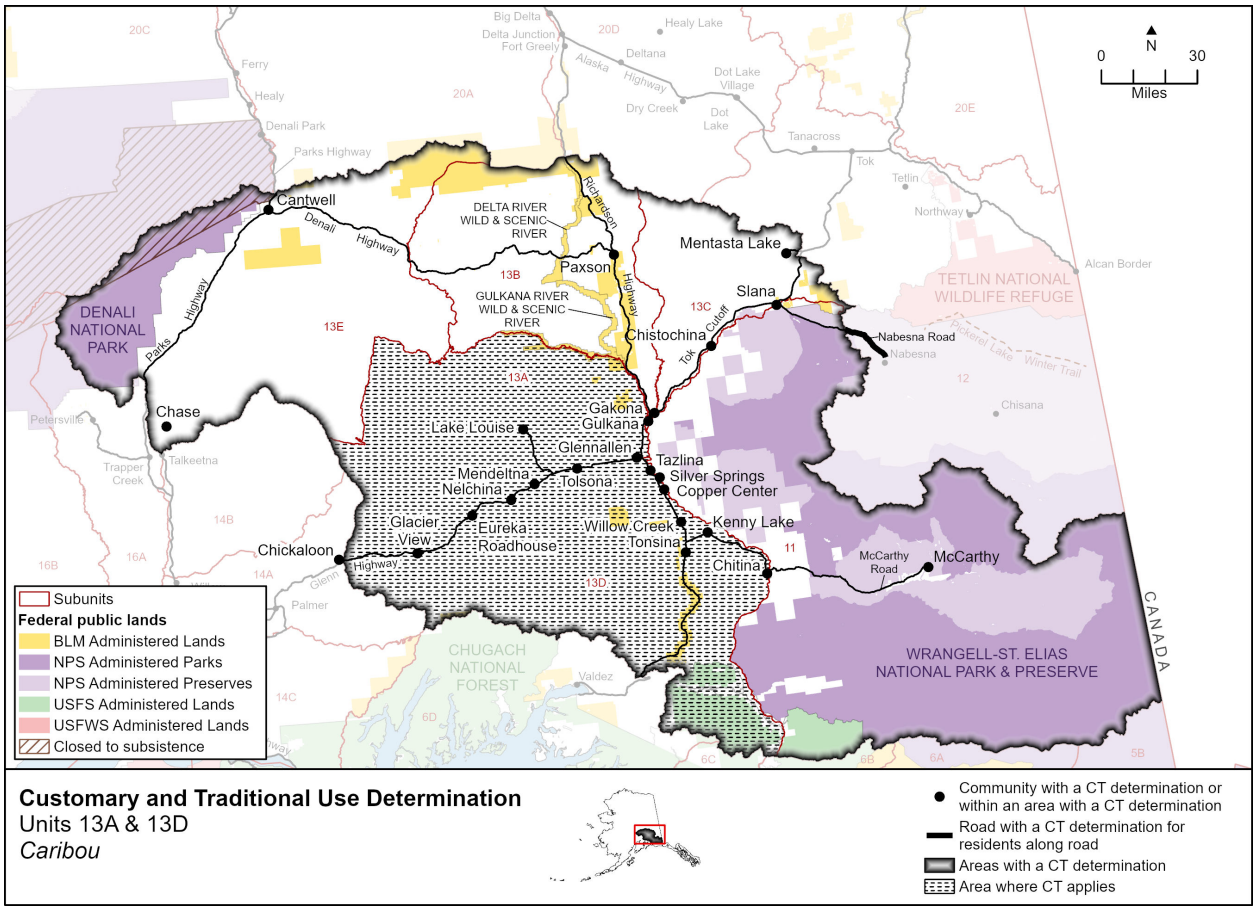


**Figure 35.** Communities and areas with a customary and traditional use determination for Units 13A and 13D.

*Unit 13B*

For most of the communities in the analysis, Unit 13B is the most important area for harvesting caribou from the NCH (Mulligan, pers. comm. 2024, OSM 2024a). There are some Federal lands in Unit 13B. Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, 20D (excluding residents of Fort Greely), and Chickaloon have a customary and traditional

use determination for caribou in Unit 13B (**Figure 36**). Of these, the communities of Paxson and Gulkana are located within 13B, while Gakona is located both in Unit 13B and 13C. Glennallen, Tazlina, and Copper Center/Silver Springs, Tolsona, Chistochina, and Kenny Lake/Willow Creek, Tonsina, Mendeltna, Nelchina, and Slana are also in reasonable proximity to Unit 13B.

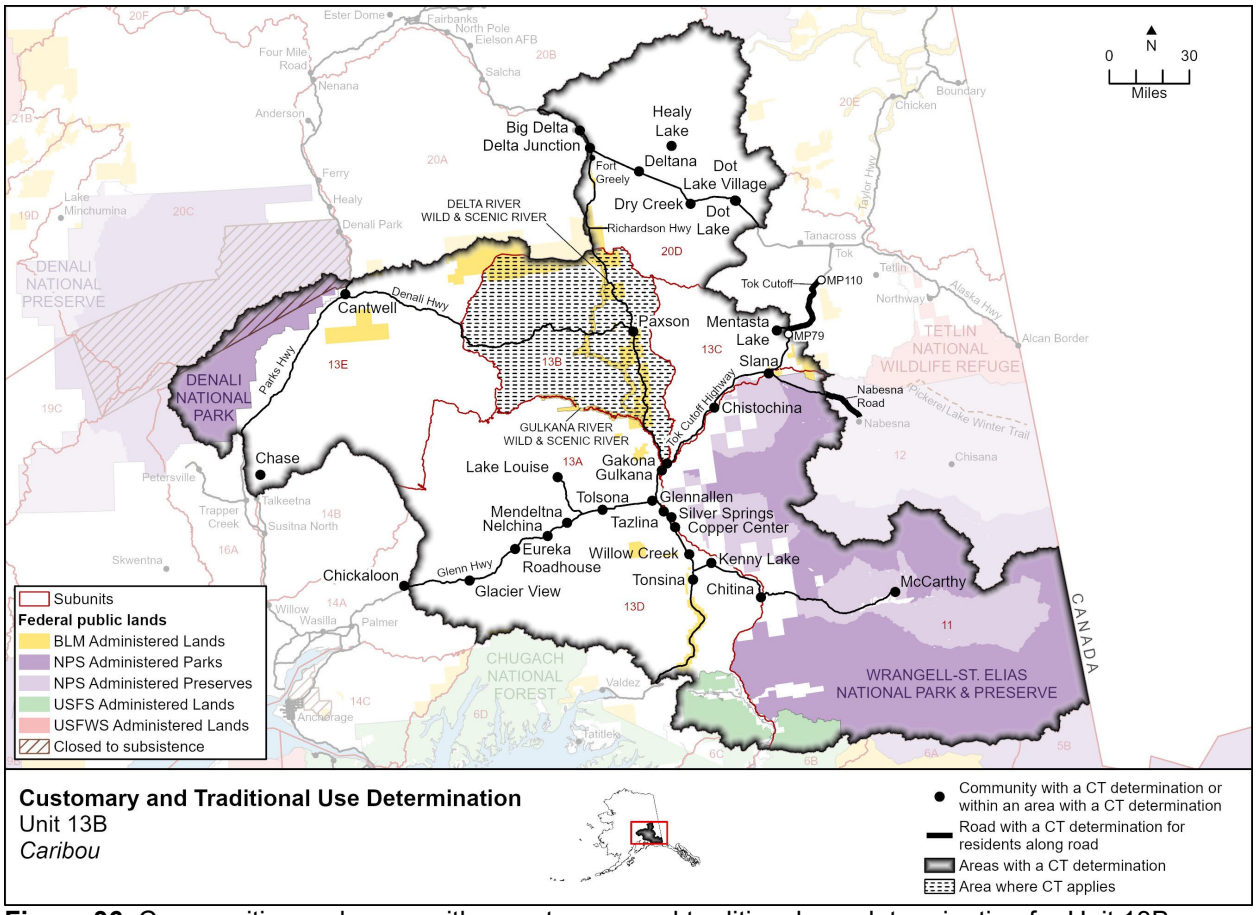


**Figure 36.** Communities and areas with a customary and traditional use determination for Unit 13B.

*Unit 13C*

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, Chickaloon, Dot Lake, and Healy Lake have a customary and traditional use determination to harvest caribou in Unit 13C (**Figure 37**). Mentasta Lake, a portion of Gakona, Chistochina, and a portion of Slana are located within Unit 13C. Gulkana is located immediately to the west of the boundary of Unit 13C with Unit 13B. Mentasta Pass is located near the boundary between Unit 13C and Unit 12. Nabesna Rd. reaches from the Unit 13C boundary through Unit 11 and into Unit 12. Glennallen, Tazlina, Copper Center/Silver Springs, and Tolsona are all located in reasonable proximity to Unit 13C.

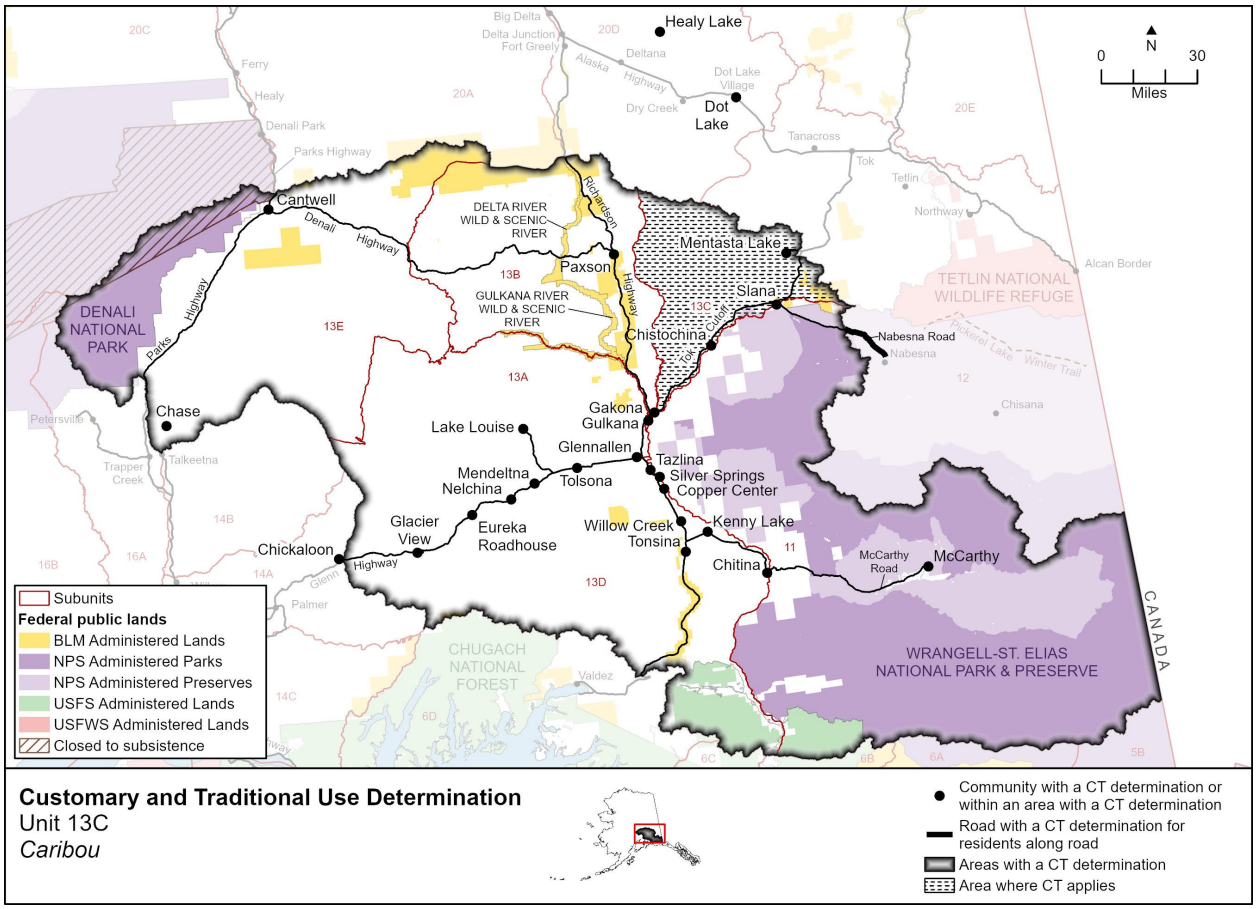


**Figure 37.** Communities and areas with a customary and traditional use determination for Unit 13C.

*Unit 13E*

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

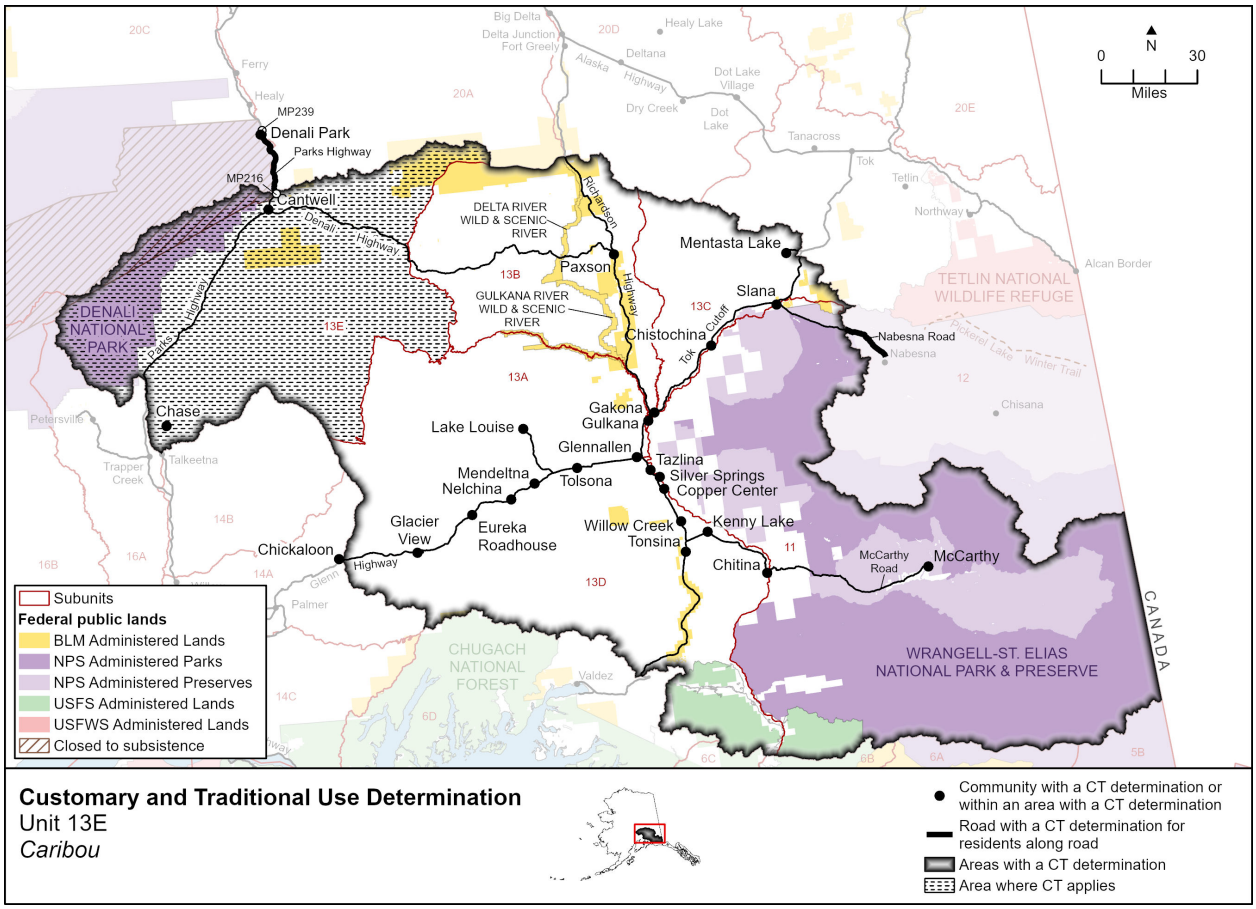


**Figure 38.** Communities and areas with a customary and traditional use determination for Unit 13E.

*Unit 11, North of the Sanford River*

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

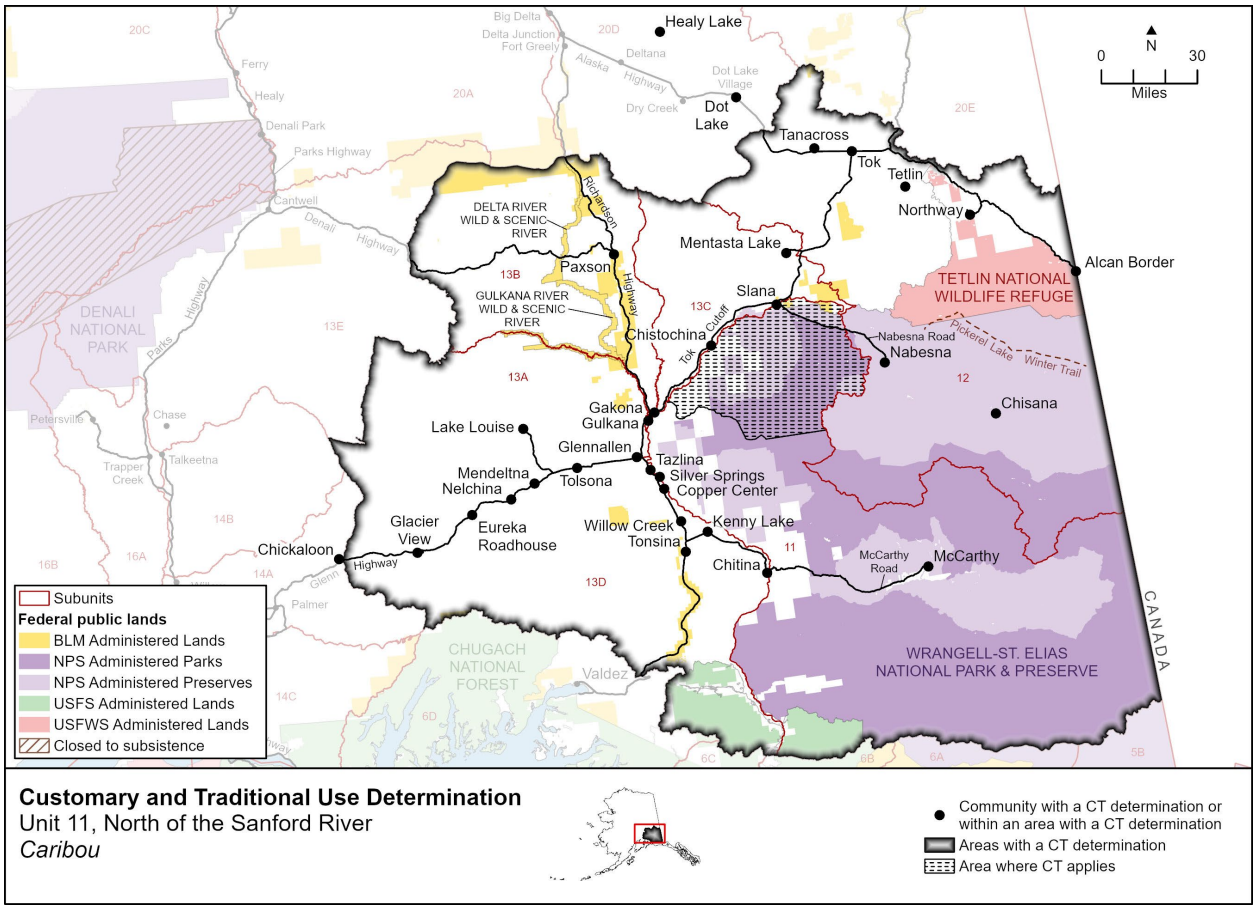


**Figure 39.** Communities and areas with a customary and traditional use determination for Unit 11 north of the Sanford River.

*Unit 11, Remainder*

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

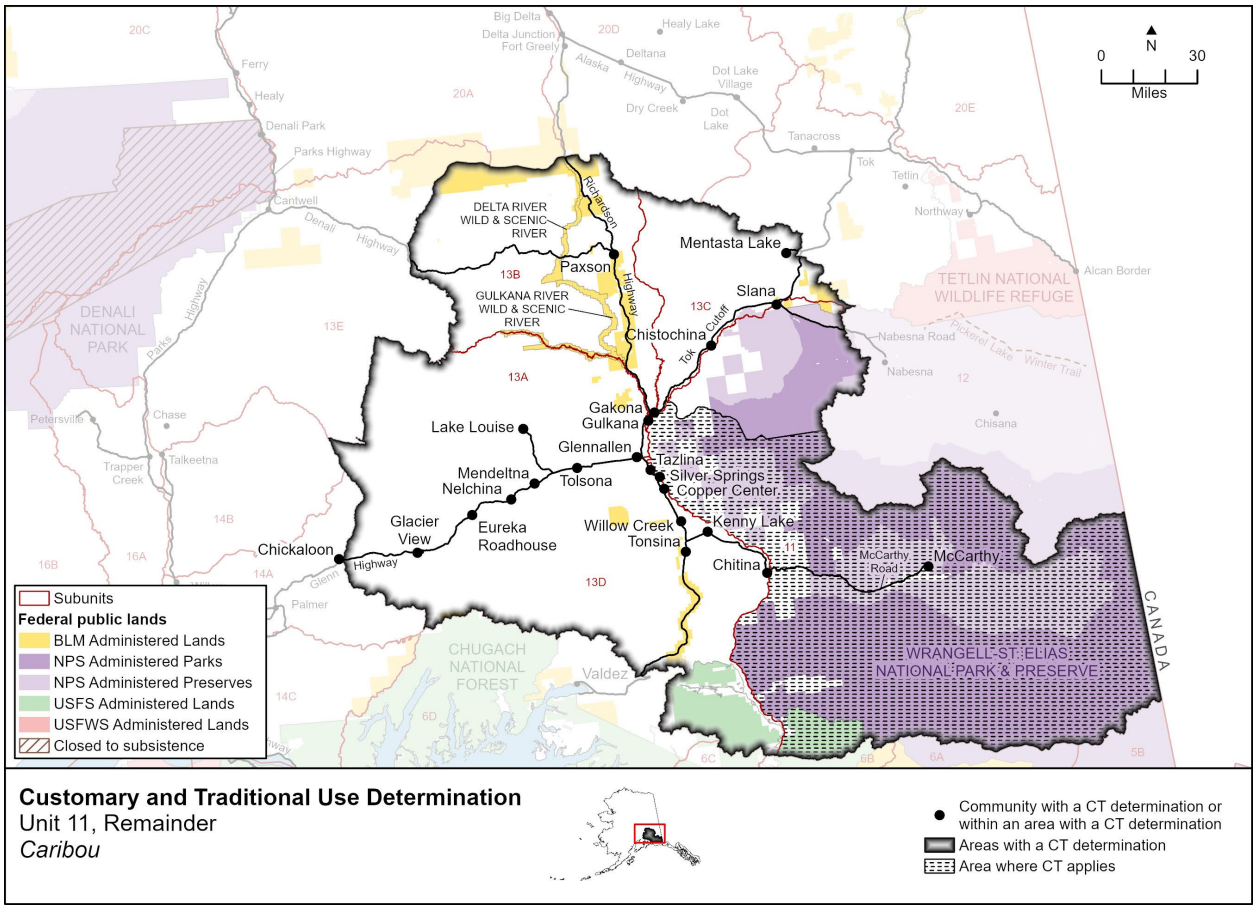


**Figure 40.** Communities and areas with a customary and traditional use determination for Unit 11 remainder.

*Unit 12 Remainder*

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

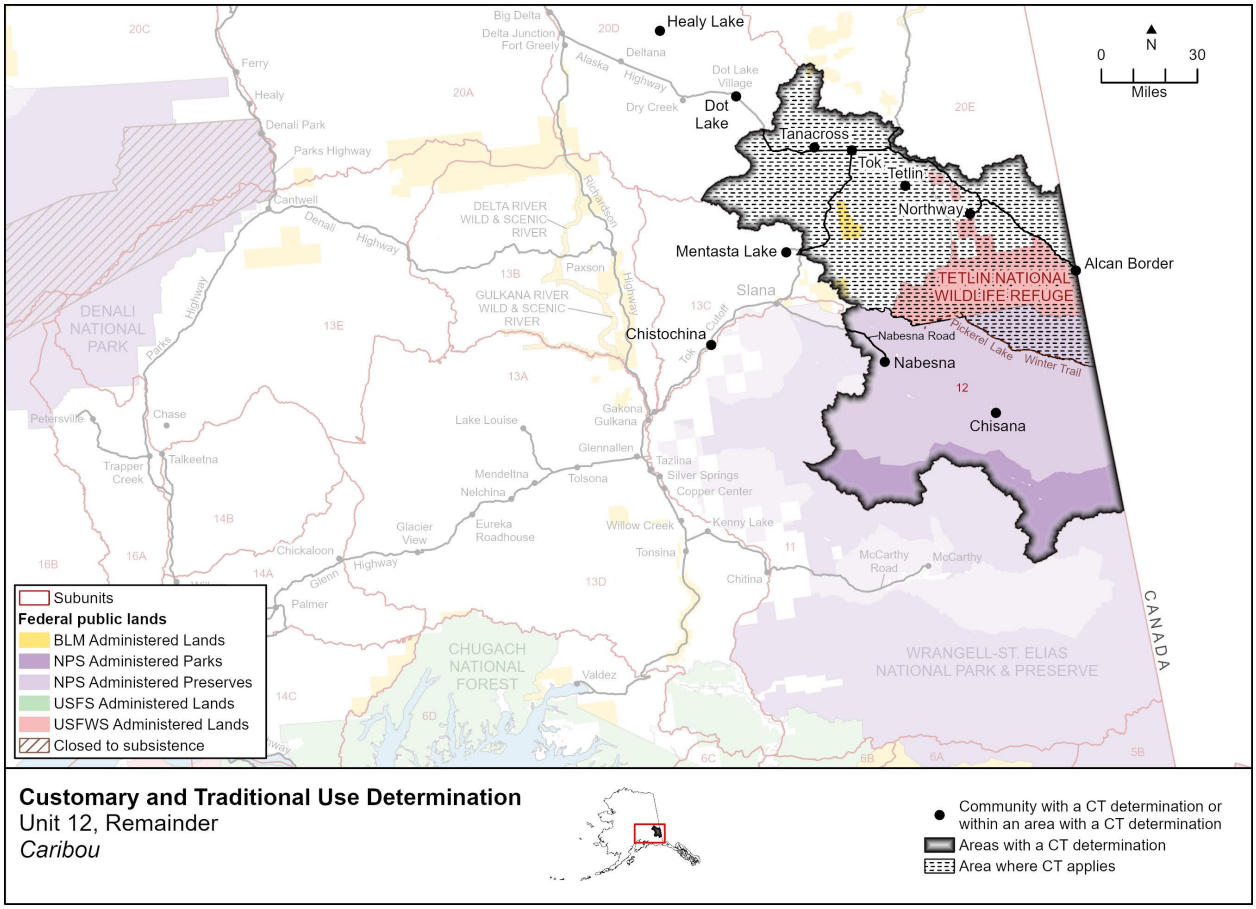


**Figure 41.** Communities and areas with a customary and traditional use determination for Unit 12.

Availability of Alternative Resources

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

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

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

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

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

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

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

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

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

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

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

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

**Other Alternatives Considered**

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

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

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

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

**Effects of the Proposal**

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

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

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

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

**OSM PRELIMINARY CONCLUSION**

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

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

The modified draft regulation reads:

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

| | |
|---|---|
| ***The Wrangell-St. Elias National Park and Preserve Superintendent, in consultation with the Alaska Department of Fish and Game, Office of Subsistence Management, and Chairs of the affected Councils, may announce season dates, harvest quotas, the number of permits to be issued, open/close seasons, and define harvest areas.***<br><br>***Federal public lands in Unit 11 north of the Sanford River are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, and Slana/Nabesna Rd. hunting under these regulations.***<br><br>***Federal public lands in Unit 11 remainder are closed to caribou hunting except by residents of Chitina, Copper Center/Silver Springs, Kenny Lake/Willow Creek, Gakona, Glennallen, Gulkana, McCarthy, McCarthy Road, Tazlina, and Tonsina hunting under these regulations.*** | |
| **Unit 12—Caribou** | |
| *Unit 12, remainder—1 bull*<br><br>***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*~~*.*<br><br>~~*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.***<br><br>***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)*<br><br>***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.***<br><br>***Federal public lands in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations.***<br><br>***Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.*** | ***May be announced between*** *Aug. 1–Sep. 30*<br><br>***May be announced between*** *Oct. 21–Mar. 31* |
| *Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)*<br><br>***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.***<br><br>***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.***<br><br>***Federal public lands in Unit 13D are closed to caribou hunting except by residents of Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina hunting under these regulations.*** | ***May be announced between*** *Aug. 1–Sep. 30*<br><br>***May be announced between*** *Oct. 21–Mar. 31* |

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

* Additionally, it is OSM's intent that Kevin and Blaine Mayo and their households be included in the Section 804 prioritization, so that they remain eligible to hunt caribou in Unit 13 in areas managed by the National Park Service where subsistence uses are allowed. Names of individuals do not appear in regulation, but they are on a list maintained by Denali National Park and Preserve.

**Justification**

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

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

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

Rescinding the existing DALs and moving the delegated authority into unit-specific regulations is a programmatic initiative because it is more appropriate than issuing special actions for routine, annual management actions. DENA and WRST have lands in Unit 13 remainder, so they should also be consulted prior to any in-season management actions in that area.

## ADDENDUM

## OSM CONCLUSION

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

### Justification

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

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

Rescinding the existing DALs and moving the delegated authority into unit-specific regulations is a programmatic initiative because it is more appropriate than issuing special actions for routine, annual management actions. DENA and WRST have lands in Unit 13 remainder, so they should also be consulted prior to any in-season management actions in that area.

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## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

### Eastern Interior Alaska Subsistence Regional Advisory Council

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

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

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

### Southcentral Alaska Subsistence Regional Advisory Council

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

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

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

## INTERAGENCY STAFF COMMITTEE COMMENTS

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

## ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

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

# APPENDIX 1: EXISTING DELEGATION OF AUTHORITY LETTERS

**Federal Subsistence Board**

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

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

FOREST SERVICE

JUN 09 2022

**In Reply Refer To**
OSM 22072.5LG

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

Dear Superintendent:

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

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

## DELEGATION OF AUTHORITY

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

**2. Authority:** This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Anthony Christianson
Chair

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

# Federal Subsistence Board

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

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

FOREST SERVICE

JUN 20 2024

In Reply Refer To:
OSM.B24042

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

Dear Field Office Manager:

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

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

## DELEGATION OF AUTHORITY

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

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

**2. Authority:** This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board."

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Anthony Christianson
Chair

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