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**Subject:** Proposal to change Federal Subsistence Regulations, Customary and Traditional Use.  
**Date:** April 2, 2025 at 3:00 PM  
**To:**

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I would like to see the Federal Subsistence Hunting Permit Eligibility by Community in hunting units 11, 12 and 13 changed. What I would like changed would be a lack of restrictions on people whom are eligible for subsistence in Wrangle St. Elias Park and Preserve as far as hunting area. Currently communities are allotted hunting areas that are close to them. This is like telling Anchorage residents of Mt. View that they can only shop at the Red Apple, Hillside residents must shop in the Abbott /Diamond area. Game populations are not static as far as location or abundance and if you're dependent on harvesting animals you have to go where they are located.

The rural subsistence preference has and is a point of contention between the State of Alaska and the Federal Government. At one point a unit 13 Caribou permit had a very low chance of being drawn, the same permit on the Nabesna road was an easy draw. So living in Kenny Lake I was able to continue harvesting Caribou as well as moose and sheep in that area of Unit 11 and 12.

The last 50 years have seen many changes that influenced game harvesting, human numbers have fluctuated, ATV's have proliferated, ANILCA took land out of federal ownership, President Carter created Parks and Preserves, weather and fires have influenced game abundance as have the presence or absence of predators.

Using highway vehicles and camping equipment I was able to raise 3 children as well as share meat with my then wives Native family and local Pastors, my hunting partner had 13 children over several generations and similar obligations. While there are persons qualified for subsistence that do not depend heavily on fish and game there are also people that do depend on game harvesting. NPS commitment to subsistence use, especially to young people, is important as far as nutrition as well as tradition.

For myself it will give me the opportunity to hunt sheep as an elder in an area that I, my partner and my son have taken sheep from and using my knowledge of the geological features that will allow a 78 year old to be successful. Thank you for your consideration.

## 2024 Federal Subsistence Hunting Permit Eligibility by Community Units 11, 12 and 13 (most caribou hidden)

Community	Community Location (Unit)	Goat Unit 11 (FG1101)	Moose Unit 11/12 Nabesna R (RM291)	Moose Unit 11 rem. Fall (FM1106)	Moose Unit 11 S of Chitina R Winter (FM1107)	Sheep Unit 11 Jr/Sr = FS1103 Sr Only = FS104	Sheep Unit 12 Sr Only = FS1201 Jr/Sr = FS1204	Chisana Caribou Unit 12 (FC1205)	Moose Unit 13 (FM1301)
Chickaloon (preserve only)	14A		X	X	X				X
Chisana	12		X*	X*		X*	X	X	X
Chistochina	13C	X	X	X	X	X	X	X	X
Chitina	13D	X	X	X	X	X			X
Copper Center	13D	X	X	X	X	X			X
Dot Lake	20D	X	X*	X*		X*	X	X	X
Gakona	13B	X	X	X	X	X			X
Glennallen	13A&D	X	X	X	X	X			X
Gulkana	13B	X	X	X	X	X			X
Healy Lake	20D		X*	X*		X*	X	X	X
Kenny Lake	13D	X	X	X	X	X			X
McCarthy/Kennecott	11	X	X#	X	X	X			
McCarthy Road	11	X	X#	X	X	X			
Mentasta Lake	13C	X	X	X	X	X	X	X	X
Nabesna	12	X	X*	X*		X	X	X	X
Nabesna Road (MP 0-25)	11	X	X	X	X	X			
Nabesna Road (MP 25-48)	12	X	X*	X*		X	X	X	X
Northway	12		X*	X*		X*	X	X	X
Slana	11 & 13C	X	X	X	X	X	X		X
Tanacross	12		X*	X*		X*	X	X	X
Tazlina	13D	X	X	X	X	X			X
Tetlin	12		X*	X*		X*	X	X	X
Tok	12		X*	X*		X*	X	X	X
Tok Cutoff (MP 79-110)	12	X	X*	X*		X	X	X	X
Tonsina	13D	X	X	X	X	X			X
Unit 11 other	11	X	X#	X	X	X			
Unit 12 other (preserve only outside resident zone)	12		X*	X*		X*	X	X	X
Unit 13A-D (preserve only outside resident zone)***	13A-D		X	X	X				X

### Notes:

X\* = Unit 11 C&T is only for Unit 11 north of Sanford River

X# = Unit 11 portion of RM291 hunt area only. (Unit 12 remainder C&T for moose only applies to residents of Unit 11 N of 62nd parallel.)

Caribou: Permits for Unit 11 Caribou (FC1108) will only be issued if season is announced. Take names for Barbara.

Unit 13: This table only identifies whether someone is eligible for a permit. A separate handout includes the details by sub-unit.

Generally WRST staff only issue Unit 13 permits at the Slana Ranger Station and to people living from Chistochina north.

X = eligible 😊!★