

This proposal requests that the Board close Bureau of Land Management lands in Unit 13 to the hunting of moose by non-federally qualified users.

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Proposed Federal Regulation

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Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit (FM1301) only; only 1 permit will be issued per household.

Aug. 1–Sept.

Bureau of Land Management lands are closed to moose hunting except by federally qualified subsistence users hunting under these regulations.

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Unit 13, remainder —1 antlered bull moose by Federal registration permit (FM1301) only.

Aug. 1–Sept.

Bureau of Land Management lands are closed to moose hunting except by federally qualified subsistence users hunting under these regulations.

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This proposal was initially submitted as a special action in 2024 (WSA24-06). The Board adopted the special action with modification, closing only Unit 13B to moose hunting by non-federally qualified users for the 2024/2025 and 2025/2026 regulatory years.

The food security situation for residents of Unit 13 is now more dire than when the special action was submitted. Without the Nelchina caribou herd, federally qualified subsistence users rely heavily on moose as an alternative resource, but there is so much competition that people are unable to continue their subsistence uses of the species.

People come from all over Alaska and beyond to hunt in our area because we are on the road system. We cannot compete with urban hunters. Often there are so many hunters that rural residents avoid important hunting areas entirely. The Federal lands available for hunting in Unit 13 are relatively small, but having the space to pursue subsistence hunting for moose safely and without conflict would be hugely beneficial for communities that are struggling.

Moose Roadkill Trends and Impacts on Subsistence in Unit 13

The following table shows the number of moose-vehicle collisions reported in the Copper Basin region from 2021 through early 2024, and was furnished by the Alaska Department Fish and Game.

Reg Year	Glenn Highway (Caribou Creek to Glennallen)	Richardson Hwy North of Glennallen	Richardson Hwy South of Glennallen	Tok Cutoff	Total
2021	40	0	0	0	40
2022	35	0	1	0	36
2023	17	4	6	2	29
2024	19	0	2	1	22

Local Recovery and Distribution of Moose Roadkill

Out of the goodness of his heart, Bruce Cain, operates a truck equipped with a lift system for recovering moose killed in vehicle collisions. He assists roadkill program participants with their roadkill recovery. The salvaged meat goes to nearby communities within Unit 13. The number of moose he reported collecting from roadkill incidents is as follows:

Year (Calendar)	Bruce Cain's Reported pickups
2021	30
2022	5 (Covid)
2023	12
2024	8

These numbers reflect a general decline in moose roadkill incidents, which may be indicative of broader population trends in Unit 13. The consistency between Bruce Cain's reports and official data supports the reliability of the observed decrease.

Subsistence and Food Security Concerns

Roadkill salvage has become a critical source of wild protein for many rural subsistence users in the Unit 13 region. Some community members rely almost entirely on salvaged game due to limited access to moose or other traditional sources of wild meat.

This decline in available moose—whether through roadkill, permitted harvests, or general population trends—has significant consequences:

- ☐ **Nutritional Impacts:** Reduced access to wild meat forces reliance on store-bought foods, which are often highly processed and nutritionally inferior. This shift contributes to worsening health outcomes in rural communities.
- ☐ **Cultural Erosion:** Moose harvesting is not only a means of subsistence but also a core part of traditional and cultural practices. Losing access to moose threatens the intergenerational transmission of cultural knowledge and skills.
- ☐ **Increased Competition:** The growing presence of urban-based hunters in Unit 13 has made it more difficult for local subsistence users to access customary hunting areas and successfully harvest moose.

Legal and Cultural Foundations

The Alaska National Interest Lands Conservation Act (ANILCA), federally qualified hunters are to have a priority over non-federally qualified hunters. This priority is diminished when, non-federally qualified hunters are using state permits on Federal lands. As a federally qualified user, I am not able to use my federal permit on State lands

The Alaska Native peoples should have the right and should be encouraged to continue hunting and gathering in their traditional ways. Ensuring meaningful access to moose and other wild foods is essential to upholding these rights and passing on traditional knowledge.

Conclusion and Request

We respectfully ask the Federal Subsistence Board to consider these trends and their impact on the health, well-being, and cultural survival of rural communities. Continued support for regulatory protections, rural priority, and enforcement of subsistence rights is crucial. Without such measures, we will continue to see hardship among our communities and the erosion of Alaska Native ways of life.