

WP26–01 Executive Summary	
General Description	Wildlife Proposal WP26-01 requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and rescind the associated Delegation of Authority Letters. <i>Submitted by the Office of Subsistence Management</i>
Proposed Regulation	Please see subparts WP26-01a–WP26-01j
OSM Conclusion	Support Proposal WP26-01 with modification to replace the term “coordination with” with “seeking input and considering feedback from”. OSM also recommends modifications to WP26-01a – Southeast and WP26-01b – Southcentral. See the WP26-01a and WP26-01b analyses for the specific, regional modifications.
Southeast Alaska Subsistence Regional Advisory Council Recommendation	WP26-01: Support as modified by OSM WP26-01a: Support as modified by OSM
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	WP26-01: Support WP26-01b: Support as modified by the Southcentral Council to rescind the Unti 6 deer DAL and add AITRC to the list of entities required for consultation for Unit 11 moose
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	WP26-01: Support as modified by OSM WP26-01c: Support
Bristol Bay Subsistence Regional Advisory Council Recommendation	WP26-01: Support as modified by OSM WP26-01d: Support

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Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	<p>WP26-01: Support as modified by OSM</p> <p>WP26-01e: Support</p>
Western Interior Alaska Subsistence Regional Advisory Council	<p>WP26-01: Support as modified by OSM</p> <p>WP26-01f: Support</p>
Seward Peninsula Subsistence Regional Advisory Council Recommendation	<p>WP26-01: Support as modified by OSM</p> <p>WP26-01g: Support</p>
Northwest Arctic Subsistence Regional Advisory Council	<p>WP26-01: Support as modified by OSM</p> <p>WP26-01h: Support</p>
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	<p>WP26-01: Support as modified by OSM</p> <p>WP26-01i: Support as modified by the Eastern Interior Council to add Ahtna Intertribal Resource Commission and Tanana Chiefs Conference (TCC) Tribal Resources Stewardship Department to list of entities to coordinate with for Unit 12 caribou; add Eastern Interior Council members who serve on the Fortymile Caribou Herd Harvest Management Coalition and TCC Tribal Resources Stewardship Department to list of entities to coordinate with and add authority to set harvest quota and define harvest area for Units 20 & 25 caribou</p>
North Slope Subsistence Regional Advisory Council Recommendation	<p>WP26-01: Support as modified by OSM</p> <p>WP26-01j: Support</p>

WP26–01 Executive Summary	
Interagency Staff Committee Comments	Please see full comment at the end of this master analysis.
ADF&G Comments	Oppose
Written Public Comments	<p>One support</p> <p>See Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.</p>

STAFF ANALYSIS WP26-01

ISSUES

Wildlife Proposal WP26-01, submitted by the Office of Subsistence Management (OSM), requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and rescind the associated DALs.

This analysis serves as the “master analysis” and contains information consistent and relevant across all regions. Specific proposed regulations are grouped by region in separate analyses as follows: WP26-01a – Southeast; WP26-01b – Southcentral; WP26-01c – Kodiak/Aleutians; WP26-01d – Bristol Bay; WP26-01e – Yukon-Kuskokwim Delta; WP26-01f – Western Interior; WP26-01g – Seward Peninsula; WP26-01h – Northwest Arctic; WP26-01i – Eastern Interior; WP26-01j – North Slope.

While OSM transferred most authority verbatim from the DALs into the unit-specific regulations, some modifications were necessary for clarity or accuracy. These modifications are noted in the region-specific regulations contained in the separate, regional analyses.

The land management units (e.g. National Wildlife Refuges or National Parks and Preserves) required for coordination of management actions are specified, but not the specific position at each unit. Also, the Federal manager administering a Federal permit already has authority to set permit conditions, such as reporting periods. Therefore, specific authority to set permit conditions in a DAL was not transferred into unit-specific regulations. Permit conditions must be approved by OSM, which occurs annually as permits are updated, and in accordance with the current Office of Management and Budget (OMB) information collection authorization.

Additionally, every DAL contains boilerplate language permitting Federal in-season managers “to close and reopen Federal public lands to nonsubsistence hunting.” This authority was not transferred into the unit specific regulations as it is more appropriately retained by the Federal Subsistence Board (Board). A few DALs contain authority to close Federal public lands to all users. This authority is specific to those hunts and therefore was transferred into the unit-specific regulations.

Finally, Federal regulations for delegated authority (§___10(d)(6)) specify the Board may delegate authority “within frameworks established by the Board.” To clarify this in the unit-specific regulations, the phrase “within the regulatory parameters set by the Board” was added, meaning that in-season managers may not announce seasons or harvest limits that are outside the bounds of the seasons or harvest limits established in codified Federal regulation.

Proponent statement

The proponent states that currently, many Federal in-season managers have been delegated authority by the Federal Subsistence Board to manage hunts through DALs. These DALs are administrative tools that the Board may issue or rescind at any time. Actions taken by Federal in-season managers under a DAL are classified as special actions and are therefore subject to regulatory requirements, including the obligation to hold a public hearing for any management action extending beyond 60 days, as outlined in §51.19. Special actions are intended to address temporary, emergency, or unforeseen circumstances. However, many of the in-season management actions currently implemented through wildlife DALs are routine and recurring, such as closing hunting seasons when harvest quotas are reached.

Including delegated authority for routine in-season decisions within unit-specific regulations is a more efficient approach than issuing special actions on an annual recurring basis. This method establishes a transparent public process for modifying delegated authority through the standard regulatory proposal system. This change in regulations will add approximately 10 pages of regulatory language. However, it reduces the administrative burden on Federal managers by eliminating the procedural requirements associated with special actions. Overall, this proposal enhances government efficiency by streamlining in-season management, promoting consistency across the State, and strengthening coordination and engagement with the State of Alaska.

The current approach to in-season management through DALs presents several operational inefficiencies:

- **Public Hearing Requirements:**
 - In-season managers must hold public hearings for actions lasting more than 60 days.
 - Even for routine actions like closing a season when a harvest quota is met, these hearings require time to coordinate, advertise, and conduct.
 - Attendance at these hearings is often low, making the effort disproportionate to the outcome.
- **Tribal Consultation Requirements:**
 - DALs require Tribal consultations “to the extent practicable.”
 - For routine matters, consultations are rarely practicable due to the time and effort needed to coordinate them.
- **Subsistence Regional Advisory Council (Council) Involvement:**
 - DALs require seeking Council recommendations when time allows and without causing undue delay.
 - This process can delay timely implementation and consumes both staff and Council resources for otherwise straightforward decisions.
- **Confusing Language in DALs:**
 - DALs include unclear guidance about “notifying proponents,” since these routine actions are treated as special actions under the current framework.

- This adds unnecessary complexity to what should be simple, recurring management tasks.
- Challenges with Consistency and Enforcement:
 - High staff turnover makes it difficult to consistently follow and enforce all DAL-related requirements.
 - The administrative burden and complexity hinder effective and timely management.

Efficiencies and improved coordination could be gained by moving the delegations to regulations:

- Streamlined Regulatory Language:
 - Condenses approximately four pages of DAL requirements into a single paragraph within unit-specific regulations.
- Reduced Administrative Burden:
 - Eliminates the need for:
 - Public hearings
 - Tribal consultations
 - Regional Advisory Council (RAC) recommendations
 - Proponent notifications
 - Significantly reduces the time, effort, and resources required to implement routine in-season management actions.
- Improved Coordination and Consistency:
 - Establishes a clear, standardized process for routine in-season actions across Alaska.
 - Clarifies expectations for Federal in-season managers, Councils, and the State of Alaska regarding:
 - Coordination responsibilities
 - Communication protocols with rural subsistence users
- Simplified Oversight and Maintenance:
 - Reduces the Office of Subsistence Management's (OSM) workload by eliminating the need to maintain and update 61 DALs.
 - Prevents outdated guidance due to changes in hunt areas or other regulatory parameters.

Existing Federal Regulations

Note: Please see the "Proposed Federal Regulations" sections in each of the 10 separate, regional analyses. For brevity, the existing Federal regulations are not included in this analysis.

Relevant Federal Regulation

§ 51.10(d) Powers and Duties of the Board

* * * *

(6) 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.

Proposed Federal Regulations

See the separate, regional analyses WP26-01a – WP26-01j.

Existing State Regulations

None.

Note: As delegated authority exists only under Federal regulations, there are no corresponding State regulations. While there are corresponding State hunts for the Federal hunts affected by the delegated authority changes, for brevity, those regulations are not included in this analysis.

Regulatory History

Per regulation, the Board may delegate authority to agency field officials to manage hunts (see Relevant Federal Regulations section above). Delegating authority to local Federal land managers for in- or pre-season hunt management decisions is beneficial because they have a greater connection to and knowledge of affected wildlife resources, local subsistence users, and current on-the-ground situations, such as adverse weather affecting the resource and hunting opportunity, than the Board. They can also make decisions more expeditiously, such as closing a season when a harvest quota is approached to avoid overharvest.

The Board has delegated authority to Federal in-season managers in unit-specific regulations since at least 2000. For example, in the 2000-01 Federal subsistence regulations booklet, the Koyukuk/Nowitna National Wildlife Refuge manager had authority to announce a winter moose hunt in Unit 21D, Koyukuk Controlled Use Area. This delegated authority, as well as numerous other delegated authorities, are still in unit-specific regulations.

In the early 2000s, the Board began using DALs to allow more flexible management, since these letters can be quickly changed or withdrawn administratively without going through the full regulatory process. Since 2010, a table of DALs have been included at the end of the Federal subsistence wildlife regulations booklet. In 2010, all DALs were for the Southeast Region. Since then, the number of DALs has proliferated to 61 wildlife DALs across all 10 subsistence resource regions by 2024. While administrative actions, most existing DALs were created through Board action on regulatory proposals. Many DALs

were created opportunistically as proposals were analyzed and authority was transferred out of existing regulations and into DALs as a housekeeping modification. Other DALs were created to manage new or modified hunts through regulatory proposals.

While the initial intent of issuing DALs was to increase flexibility and efficiency, an unforeseen consequence was increasing the administrative burden on Federal in-season managers and OSM. As mentioned in the proposal and in the proponent statement section of this analysis, any management action taken through a DAL must be considered a special action subject to associated regulatory requirements such as holding public hearings and seeking Council recommendation if timing allows. The DALs also contain additional requirements for conducting tribal consultations, record keeping, and proponent notification. As these letters became more common over the past 15 years, they have been implemented inconsistently.

The administrative burden on OSM of maintaining 61 DALs has also become unwieldy. In preparation for submitting this proposal, WP26-01, OSM identified areas of overlap or inconsistency that will be resolved in the unit-specific regulations. For example, two DALs for the same area and species, Unit 9C caribou, had been issued to two different Federal managers. Unit 5B moose and Unit 6C moose have authority delegated in unit-specific regulations as well as in a DAL. Additionally, the boundary for a Unit 18 moose hunt was modified through Proposal WP24-19, but the corresponding DAL was not updated to reflect the hunt area boundary change.

In February 2025, the Board adopted WP25-01 with modification to change Nelchina caribou herd hunts in Units 11, 12 remainder, and 13. One of the changes was to move authority from DALs into unit-specific regulations. The analysis justified this change as, “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.” This “testcase” was also supported by both the Eastern Interior and Southcentral Councils (OSM 2025).

Alternative(s) Considered

One alternative considered was replacing the term “coordination with” with either “consultation with” or “seeking input and considering feedback from.” This replacement may provide more clarity on intended requirements, reduce confusion, and improve consistency in implementing delegated authority across the State as people may interpret “coordination with” differently.

Currently, all DALs contain the word “coordinate,” while delegated authority currently in unit-specific regulations contain the word “consult.” As government-to-government Tribal consultations are required when practicable in the DALs, the word “coordinate” was likely used to reduce potential conflation. Federal regulations establishing that the Board may delegate authority to Federal in-season managers (see Relevant Federal Regulations section) do not contain any requirements or guidance for managers to coordinate or consult with anyone. While Federal regulations regarding special actions in §51.19(b)(1)(i) stipulate, “*Prior to implementing a temporary special action, the Board will consult with the State of Alaska and the Chairs of the Regional Councils of the affected regions,*” delegated authority in regulation are not special actions.

Regardless of the term used, OSM intends for in-season managers to do their due diligence in communicating their proposed in-season management actions and rationale to the required entities and to consider all feedback received in making any adjustment to the in-season action/rationale. However, OSM welcomes input from the Councils and the Board on further defining this requirement.

Discussion and Effects

OSM considers WP26-01 as mostly an administrative proposal. Adoption will not affect wildlife resources or subsistence opportunity. However, operational efficiency will increase as detailed in the proponent statement section. The administrative burden on Federal in-season managers and OSM will decrease, and routine management decisions can be made more expeditiously. This proposal also increases transparency as changes to delegated authority can be requested through the regulatory proposal process and by allowing the public to more easily reference what authority is delegated for particular hunts.

Previously, Councils and the public questioned how DALs could be rescinded or amended (SCRAC 2023a; 2023b). As an administrative function, Councils or the public could request changes verbally during Board meetings or in writing through letters or e-mails to the Board. However, as the delegation of authority is an administrative (not regulatory) action, the Board can still delegate authority to in-season managers if needed at any time through letters, although OSM expects any future DALs issued by the Board to be temporary (i.e. have an expiration date).

OSM anticipates another effect of this proposal going through an extensive review process by the Councils, Tribes and ANSCA corporations, the public, Federal land managers, and the Alaska Department of Fish and Game (ADF&G) will be increased understanding of the delegated authority process and consistency in its implementation across the State. All delegated authority requires coordination with several entities, including OSM. While not specified in regulation, OSM intends coordination to mean that the in-season manager does due diligence in communicating their proposed in-season action and rationale to the required entities and considers all feedback received in making any adjustment to the in-season action/rationale. Specifically, for OSM, in-season management actions should be coordinated, prior to implementation, with the OSM Wildlife Division Supervisor. Once the management action has been decided, notification should be sent to the OSM Wildlife Division Supervisor, the OSM Records Specialist for filing in the administrative record, and the OSM Outreach Specialist for posting on the OSM website and distributing to OSM regional contacts list.

Several other 2026 wildlife proposals propose modifications to delegated authority. The Board's action on those proposals may technically conflict with regulatory changes proposed by this proposal. However, OSM's intent is for action on those proposals to supersede action on this proposal as reconciling potential modifications is untenable and creates unnecessary regulatory complexity.

OSM CONCLUSION

Support Proposal WP26-01 **with modification** to replace the term “coordination with” with “seeking input and considering feedback from”.

OSM also recommends modifications to WP26-01a – Southeast and WP26-01b – Southcentral. See the WP26-01a and WP26-01b analyses for the specific, regional modifications.

The draft regulations read:

Note: Only one example is included for brevity. However, the same change would be applied to all the delegated authorities being transferred into unit-specific regulations.

Unit 15—Goat

Unit 15—1 goat by Federal drawing permit. Kids or nannies accompanied by kids may not be taken.

*Aug. 10-Nov.
14*

The Kenai NWR manager after seeking input and considering feedback from ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season; set harvest quotas, number of permits issued, and sex restrictions; and define harvest zones.

Justification

Adopting WP26-01 will improve government efficiency by eliminating many unnecessary steps and requirements for Federal land managers to make routine, annual management decisions; decreasing the administrative burden on OSM of maintaining 61 DALs; and enhancing public transparency by allowing changes to delegated authority through the regulatory process. Moving delegated authority to unit-specific regulations for routine management actions taken every year is more appropriate and expeditious than issuing special actions annually, which are intended for emergency, unforeseen circumstances and have additional regulatory stipulations.

Replacing the term “coordination with” with “seeking input and considering feedback from” clarifies the intended requirements of the in-season manager, reducing confusion and improving consistency in implementation across the State.

LITERATURE CITED

OSM. 2025. Staff analysis WP25-01. Pages 358–481 *in* Federal Subsistence Board Meeting Materials. Feb 4–7, 2025, in Anchorage. Office of Subsistence Management, DOI. Anchorage, AK.

SCRAC. 2023a. Transcripts of the Southcentral Alaska Subsistence Regional Advisory Council proceedings, Mar 15, 2023. Office of Subsistence Management, DOI. Anchorage, AK.

SCRAC. 2023b. Transcripts of the Southcentral Alaska Subsistence Regional Advisory Council proceedings, Oct. 3–4, 2023. Office of Subsistence Management, DOI. Kenai, AK.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southeast Alaska Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM. The Council viewed this as a housekeeping proposal that will streamline in-season management and reduce the administrative burden of agencies without reducing the in-season manager's ability to take necessary actions. The Council felt that in events where quick action is required, this proposed change allows in-season managers to be more responsive. The Council also recognized that having delegated authority in regulation vs. letters provides more opportunity for the public to comment on or request changes to management authority, making the process more efficient and transparent.

Support WP26-01a as modified by OSM. The Council felt that the proposed changes will help address conservation concerns by allowing in-season managers to react to conditions on the ground while providing an understandable and transparent way to change in-season managers' authority that was previously delegated through letters. The Council also recognized that having delegated authority in regulation vs. letters provides more opportunity for the public and Councils to comment on or request changes to management authority. The Council felt that this change will be beneficial to subsistence users while not unnecessarily restricting other users.

Southcentral Alaska Subsistence Regional Advisory Council

Support WP26-01. This proposal addresses a longstanding concern of the Council. The proposal clarifies authorities the in-season manager has and provides an easier pathway for modifications to regulations related to these authorities. A concern was raised about the change in the language regarding "consulting with" to "seek feedback and consider input from," noting that it weakens the requirement. Removing the OSM modification provides more clarity about the responsibility of the in-season manager to consult with the Council chair before making decisions.

Support WP26-01b as modified by the Southcentral Council to rescind the Unti 6 deer DAL and add the Ahtna Intertribal Resource Commission (AITRC) to the list of entities required for consultation for Unit 11 moose. The Council raised concerns about retaining the Unit 6 deer delegation of authority letter. Having the delegated authority in letters disempowers the Councils and are hard to change, essentially making them permanent.

Please see WP26-01b analysis for draft regulatory language.

Kodiak/Aleutians Alaska Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM and support WP26-01c. The Council stated that the proposal would streamline the process, reduce unnecessary red tape, and make regulations clearer and more transparent by placing all relevant information directly in regulation rather than in Delegation of Authority letters. They felt this would make it easier for the public to find and understand the rules and noted that, if concerns arise later, the regulation can always be amended. There were concerns that the change could reduce opportunities for public comment and tribal consultation, which they view as

essential to the Federal Subsistence Management Program. They emphasized the importance of maintaining strong public involvement and felt that any internal efficiency issues should be addressed within the Program rather than by altering established public processes.

Bristol Bay Alaska Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM and support WP26-01d. The Council supported WP26-01 as modified by OSM as a housekeeping measure that simplifies and clarifies delegation of authority and places clear direction in regulations. Members noted this would reduce administrative burdens and public confusion without affecting hunting access, permits, or reporting, while maintaining opportunities for public notice and input. The Council did not make any region-specific modifications to WP26-01d.

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM and support WP26-01e. The Council voted to support WP26-01 as modified by OSM. The Council supports the proposal because it will hopefully help make the regulations easier for users to understand by having all the information in one place. The Council was happy to see that no changes were made to the requirement for the in-season manager to seek input from the Council Chair before finalizing management actions.

Western Interior Alaska Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM and support WP26-01f. Moving delegated authority from Delegation of Authority Letters into regulation would reduce unnecessary administrative constraints and improve efficiency in harvest management. Codifying this authority would also provide a clear and transparent mechanism for modifying or removing provisions through the established regulatory process. Comments from the Ahtna Intertribal Resource Commission regarding the inclusion of Tribal organizations in the consultation process should be further expanded and considered for all delegated authority.

Seward Peninsula Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM and support WP26-01g. The Council stated this is a housekeeping action and expect little to no effect on end users. This will simplify management actions for in-season managers, which may benefit users on the ground.

Northwest Arctic Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM and support WP26-01h. The Council believes that this proposal is an attempt to streamline the current process and make it easier for the users. Since under the streamlined process the consultations with will still take place, the Council supported this change as modified by OSM.

Eastern Interior Alaska Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM. The Council hopes that moving delegated authority into unit-specific regulations will make it easier for the public to look up which managers have delegated authority and what authorities they have been delegated. The Council also noted this proposal is intended to help streamline the administrative workload and help make routine management actions more efficient.

Support WP26-01i as modified by the Eastern Interior Council to add Ahtna Intertribal Resource Commission (AITRC) and Tanana Chiefs Conference (TCC) Tribal Resources Stewardship Department to list of entities to coordinate with for Unit 12 caribou; add Eastern Interior Council members who serve on the Fortymile Caribou Herd Harvest Management Coalition and TCC Tribal Resources Stewardship Department to list of entities to coordinate with and add authority to set harvest quota and define harvest area for Units 20 & 25 caribou. The Council voted to support WP26-01i with the following modifications:

- Modify delegated authority for Fortymile caribou to include 1) the ability to set harvest quotas, 2) the ability to designate harvest areas/zones, 3) require consultations with the Eastern Interior Council members who serve on the Harvest Management Coalition (in addition to the Council Chair), and 4) require consultations with the TCC Tribal Resource Stewardship Department.
- Modify delegated authority for Chisana caribou to require consultations with the TCC Tribal Resource Stewardship Department and AITRC.

The Council supported delegating additional authorities to the Federal in-season manager for the Fortymile caribou herd to provide more effective and flexible in-season management tools. This additional authority is especially warranted since the Fortymile herd has been declining and is currently of conservation concern. These additions will also enable the Federal manager to better collaborate with the State manager and provide greater flexibility in aligning federal and state management actions.

Additionally, the Council strongly supported adding Tribal organizations to the list of entities required for coordination prior to in-season management actions for both the Fortymile and Chisana caribou herds. The Council responded to a public comment submitted by AITRC requesting Tribal coordination and also conferred with a representative from TCC during the meeting who confirmed TCC's desire for coordination. Further, the Council felt that the Federal manager for Fortymile caribou should also consult with the Eastern Interior Council members who serve on the Fortymile Caribou Harvest Management Coalition because they have long-term involvement in management of the herd and may be more familiar with certain issues than the Council Chair at times.

Please see WP26-01i analysis for draft regulatory language.

North Slope Subsistence Regional Advisory Council

Support WP26-01 as modified by OSM and support WP26-01j. The Council stated that the proposal will reduce the administrative burden on Federal land managers. Additionally, the Council shared the change will not have an impact on subsistence uses.

INTERAGENCY STAFF COMMITTEE COMMENT

Delegation of authority by the Federal Subsistence Board (Board) is considered an administrative function of the Board. While not regulatory in nature, the Board strives to ensure delegations are transparent and open to the public. The Board uses delegation of authority as a tool to allow for timely decisions to be made by the local managers within predefined conditions. The letters were in part intended to assist in the implementation of the subsistence regulations as passed by the Board. With the proliferation of delegation of authority letters over the years, the Interagency Staff Committee (ISC) recognizes that a review of delegation of authority letters is important to ensure the management process is responsive, transparent, and collaborative.

WP26-01 is an effort to do this. However, the OSM recommended changes are comprehensive and will vary in impact from region to region. Each delegation of authority is unique and any changes will benefit from continued in-season manager input from the land managing agencies. The ISC recognizes that further review of the analysis and recommended changes would be beneficial before this proposal is taken up by the Board.

ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

Wildlife Proposal WP26-01

This proposal would move in-season authority for federal hunts currently delegated to a federal in-season manager through a delegation of authority letter into unit-specific regulations.

Position

The Alaska Department of Fish & Game (ADF&G) **OPPOSES** this proposal. At this time ADF&G is uncomfortable with the Federal Subsistence Board (FSB) codifying its delegation of in-season management to any of the federal agencies given the issues we've had, and continue to have, with those agencies carrying out the stipulations in those letters of delegation.

Under the President's Executive Order "Unleashing Alaska's Extraordinary Resource Potential" there is language directing all Department of the Interior bureaus to conduct meaningful consultation with ADF&G. Secretarial Order 3422 then directed those bureaus to develop action plans on how they were going to carry out that directive. To take it a step further Secretarial Order 3477 directed all Department of the Interior bureaus and offices to improve coordination with state wildlife agencies.

Background

Over the years ADF&G has experienced issues across the state regarding how the federal agencies and federal in-season managers carry out the stipulations laid out in the delegation of authority letters issued by the FSB. By codifying these delegations, ADF&G believes it would make it more difficult to address any concerns it has with these delegations and how they are being executed.

During the 2022-24 Wildlife Cycle meeting, the FSB approved the creation of a new hunt for caribou in Game Management Unit (GMU) 9C. This approval came along with a Delegation of Authority granted to the Superintendent of the Katmai National Park and Preserve. The requirements of the letter were followed until the announced 2025 season. Then when asked, the ADF&G Area Biologist for the GMU responded to whether they were consulted with, “They told me they were going to do it if that counts as consultation.”

For multiple years area and regional ADF&G staff have had issues with communication regarding federal hunts for the Nelchina Caribou Herd and the Bureau of Land Management (BLM) Glenallen Field Office. This issue came to a head as the herd began to decline and consultation became even more important. In 2022, last minute consultation did occur but not until BLM had already issued permits for the federal hunt so it was too late for BLM to consider the changes ADF&G was making to Nelchina herd management. Then in 2023, communication did happen earlier, but multiple BLM staff reached out to area/regional ADF&G staff, so it was uncertain about who oversaw the decision and attempt to educate them all on the same information.

While not wildlife related, another example of an issue ADF&G has had with a federal agency carrying out the requirements of a delegation of authority from the FSB is regarding the inconsistency with consultation between the federal in-season manager from the Yukon-Kuskokwim Delta National Wildlife and the ADF&G area biologists for the Kuskokwim River. At times over the years conversations have been productive but more often than not when asked, our area biologists respond that they were told about the management actions or that the action taken is not what was discussed.

WRITTEN PUBLIC COMMENTS

1. Ahtna Intertribal Resource Commission

STAFF ANALYSIS WP26-01A – SOUTHEAST ALASKA

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations - Southeast Alaska

Unit-specific regulations

Note: The Southeast Alaska Region has several DALs that convey broad authority to manage moose, deer, and mountain goat hunts across the region by ranger district, not specific, routine, annual actions by hunt area. Therefore, this delegated authority was put into the regulations for the entire unit, rather than for specific hunt areas. However, this broad authority for wildlife is unique to USFS lands within the Tongass National Forest, and the Board may want to consider whether they are still necessary.

These broad DALs also include the authority to “close Federal public lands to the take of these species by all users.” Similar to the boilerplate authority for closure to nonsubsistence users, OSM did not transfer the authority for closure to all users into the unit-specific regulations.

§ __.26(n) Unit regulations

(1) Unit 1

(viii) Unit-specific regulations:

(E) The USFS District Rangers after coordination with ADF&G, OSM, and the Chair of the affected Council(s) are authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, and adjust harvest and possession limits for deer, moose, and mountain goats.

(2) Unit 2

(i) Unit-specific regulations:

(E) The USFS District Rangers after coordination with ADF&G, OSM, and the Chair of the affected Council(s) are authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, and adjust harvest and possession limits for deer.

(3) Unit 3

(iii) Unit-specific regulations:

(E) The USFS District Rangers after coordination with ADF&G, OSM, and the Chair of the affected Council(s) are authorized within the regulatory

parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, and adjust harvest and possession limits for deer and moose.

(4) Unit 4

(iii) Unit-specific regulations:

(E) The USFS District Rangers after coordination with ADF&G, OSM, and the Chair of the affected Council(s) are authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, and adjust harvest and possession limits for deer.

(5) Unit 5

(iii) Unit-specific regulations:

(F) The USFS District Rangers after coordination with ADF&G, OSM, and the Chair of the affected Council(s) are authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, and adjust harvest and possession limits for deer in Unit 5A.

Goat

Note: Goat hunts in Unit 4 are closely managed through annual, routine management actions. Therefore, the authority for the Unit 4 goat hunt was transferred into the specific hunt area, rather than as part of the broad authority for the entire unit (see section above).

The existing DAL for Unit 4 goat does not delegate authority to define harvest zones. However, goat hunts in Unit 4 are currently managed by zones, which have specific quotas and closures. OSM added “define harvest zones” to the unit-specific delegated authority to reflect how goat hunts are actually managed.

Unit 4—Goat

Unit 4—1 goat by State registration permit only

*Aug. 1-Dec.
31*

The USFS District Ranger after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, adjust harvest and possession limits, define harvest zones, and close Federal public lands to all users.

Note: Goat hunts in Unit 5 are closely managed through annual, routine management actions. Therefore, the authority for the Unit 5 goat hunt was transferred into the specific hunt area, rather than as part of the broad authority for the entire unit (see section above).

The existing DAL for Unit 5 goat specifies the authority is “within the Yakutat Ranger District of the Tongass National Forest.” However, National Park Service (NPS) lands within Glacier Bay National Preserve (GLBA) also occur within Unit 5A. Therefore, OSM removed the limitation of the Yakutat Ranger District, so the entire hunt area is covered and added GLBA to the list of entities for coordination.

Unit 5A—Goat

Unit 5A—that area between the Hubbard Glacier and the West Nunatak Glacier on the north and east sides of Nunatak Fjord *No open season*

Unit 5A, remainder—1 goat by Federal registration permit only *Aug. 1-Jan. 31*

The Yakutat District Ranger after coordination with ADF&G, OSM, Glacier Bay National Park and Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, adjust harvest and possession limits, and close Federal public lands to all users.

Moose

Note: Moose hunts in Unit 5 are closely managed through annual, routine management actions. Therefore, the authority for the Unit 5 moose hunt was transferred into the specific hunt area, rather than as part of the broad authority for the entire unit (see section above).

The existing DAL for Unit 5A moose specifies the authority is “within the Yakutat Ranger District of the Tongass National Forest.” However, NPS lands within GLBA also occur within Unit 5. Therefore, OSM removed the limitation of the Yakutat Ranger District, so the authority applies to entire hunt areas, and added GLBA to the list of entities for coordination in Unit 5A, except Nunatak Bench, east of the Dangerous River.

Unit 5B moose has authority already listed in unit-specific regulations as well as in an associated DAL. OSM combined the two as both are not necessary. Since the harvest quota and management action (closing the season when the quota is met) are specified in regulation, OSM did not see a reason to require coordination of this delegated management authority with other entities (i.e. ADF&G, OSM, Council Chairs).

Unit 5—Moose

*Unit 5A, Nunatak Bench—1 moose by State registration permit only. Nov. 15-Feb. 15
The season will be closed when 5 moose have been taken from the
Nunatak Bench.*

The Yakutat District Ranger after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, adjust harvest and possession limits, and close Federal public lands to all users.

*Unit 5A, except Nunatak Bench, west of the Dangerous River—1 bull Oct. 8-Nov. 15
by joint State/Federal registration permit only. From Oct. 8-21, public
lands will be closed to taking of moose, except by residents of Unit 5A
hunting under these regulations.*

The Yakutat District Ranger after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, adjust harvest and possession limits, and close Federal public lands to all users.

*Unit 5A, except Nunatak Bench, east of the Dangerous River—1 bull Sep. 16-Nov. 15
by joint State/Federal registration permit only. From Sep. 16-30,
public lands will be closed to taking of moose, except by residents of
Unit 5A hunting under these regulations.*

The Yakutat District Ranger after coordination with ADF&G, OSM, Glacier Bay National Park and Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, adjust harvest and possession limits, and close Federal public lands to all users.

***Unit 5B—1 bull by State registration permit only. The Wrangell-St. Sep. 1-Dec. 15
Elias National Park and Preserve superintendent will close the***

~~season will be closed when 25 bulls have been taken from the entirety of Unit 5B.~~

Wolf

Note: The existing DALs are to the Craig District Ranger and the Thorne Bay District Ranger within their respective ranger districts. However, since the DALs were issued, the USFS management structure has changed. Now, the Prince of Wales District Ranger manages all of Unit 2. OSM updated the authority to reflect this change and also removed the unnecessary stipulations on ranger districts to simplify the regulatory language.

Unit 2—Wolf Hunting

Unit 2—No limit. All wolves taken will be sequentially numbered, marked with the date and location recorded by the hunter for each wolf, and all hides must be sealed within 15 days of take. Sep. 1-Mar. 31

The Prince of Wales District Ranger after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close/reopen/adjust seasons.

Unit 2—Wolf Trapping

Unit 2—No limit. All wolves taken will be sequentially numbered, marked with the date and location recorded by the trapper for each wolf, and all hides must be sealed within 15 days of take. Nov. 15-Mar. 31

The Prince of Wales District Ranger after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close/reopen/adjust seasons.

Other Alternative(s) Considered

Both the authority already delegated in the unit-specific regulations for Unit 5B moose and the existing DAL state the season will be closed when 25 bulls have been taken from Unit 5B. This language only

halts moose harvest by federally qualified subsistence users hunting under Federal regulations. Closure of the Federal moose season still allows harvest to occur under State regulations on Federal public lands.

One alternative considered is to modify the authority delegated for Unit 5B moose to close Federal public lands (vs only the season) when 25 bulls have been harvested in Unit 5B. This modification will prevent additional harvest and help protect the moose population after the harvest quota has been met.

Another alternative considered was to preserve the DALs conveying broad authority to manage moose, deer, and mountain goat hunts across the Southeast region by ranger district as letters (vs. transferring into the regulations for the entire unit). This broad authority for wildlife is unique to USFS lands within the Tongass National Forest (and Chugach National Forest lands in Unit 6). The Council and the Board may want to consider whether they are still necessary at all, and if they are, whether they are more appropriately retained as DALs or as codified regulations.

If they are retained as DALs, new DALs will need to be issued as all species are currently combined into one letter (which is also unique to the Southeast and Unit 6 DALs). Some species (i.e. wolves in Unit 2 and goats in Unit 4) undergo annual, routine management actions, so transferring authority into the regulations for these specific hunt areas is appropriate, while others (i.e. deer in Unit 4) do not have any routine management actions. Any in-season management actions for Unit 4 deer, for example, would be a result of an unforeseen, emergency situation. Therefore, a special action process would be more appropriate.

OSM CONCLUSION

Support Proposal WP26-01a **with modification** to retain the broad authority to manage some moose, deer, and mountain goat hunts across the Southeast region by ranger district within the Tongass National Forest in Delegation of Authority letters and to clarify the Unit 5B moose regulations.

The draft regulations read:

§ __.26(n) Unit regulations

(1) Unit 1

(viii) Unit-specific regulations:

(2) Unit 2

(i) Unit-specific regulations:

(3) Unit 3

(iii) Unit-specific regulations:

(4) Unit 4

(iii) Unit-specific regulations:

(5) Unit 5

(iii) *Unit-specific regulations:*

Unit 5B—Moose

*Unit 5B—1 bull by State registration permit only. **The Wrangell-St. Elias National Park and Preserve superintendent will close Federal public lands to the harvest of moose** ~~the season will be closed~~ when 25 bulls have been taken from the entirety of Unit 5B.* Sep. 1-Dec. 15

Justification

See the WP26-01 master analysis.

Retaining the broad management authority for district rangers to manage some moose, deer, and mountain goat hunts across the Southeast region in DALs is more appropriate than transferring this authority to the unit-specific provisions by unit. Actions taken in these cases fall outside of routine management actions and would arise from unforeseen, emergency situations. Therefore, they should be special actions as required in the DALs.

Modifying the Unit 5B moose delegated authority to close Federal public lands (instead of only closing the Federal season) prevents additional moose harvest under State regulations from occurring after the harvest quota has been met.

**STAFF ANALYSIS
WP26-01B - SOUTHCENTRAL**

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations - Southcentral

Caribou

Note: OSM added the authority to “set the number of permits issued” to reflect how the hunt is currently being managed and because unlimited permits are not appropriate for draw hunts.

OSM also combined the Unit 15B and 15C hunt areas to simplify regulations and added the authority to “define harvest areas” to reflect how the hunt is currently being managed to address conservation concerns.

Unit 15—Caribou

Unit 15B, within the Kenai National Wildlife Refuge Wilderness Area, and Unit 15C, north of the Fox River and east of Windy Lake—1 caribou by Federal drawing permit *Aug. 10-Sep. 20*

The Kenai NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, define harvest areas, and set harvest quotas, sex restrictions, and the number of permits issued.

~~*Unit 15C, north of the Fox River and east of Windy Lake—1 caribou by Federal drawing permit*~~ ~~*Aug. 10-Sep. 20*~~

Unit 15, remainder *No open season*

Deer

Note: The DAL for Unit 6 deer specifies coordination with the Bureau of Land Management (BLM) Anchorage Field Office Manager. OSM corrected this to the BLM Glennallen Field Office manager to accurately reflect BLM districts.

Also, the Unit 6 DAL for moose and deer is combined. Some of the authority was not appropriate for both species. Therefore, OSM only transferred the relevant authority from the DAL into the unit-specific regulations for deer.

Unit 6—Deer

Unit 6—5 deer; however, antlerless deer may be taken only from Oct. 1-Jan. 31. Only 1 of the 5-deer harvest limit may be taken between Jan. 1-31 Aug. 1-Jan. 31

The Cordova District Ranger after coordination with ADF&G, OSM, BLM Glennallen Field Office (for BLM affected lands), Wrangell-St. Elias National Park and Preserve (for NPS affected lands), and the Chair of affected Council(s) is authorized within the regulatory parameters set by the Board, to adjust harvest and possession limits, including sex restrictions.

Goat

Note: OSM added Kenai National Wildlife Refuge (NWR) to the entities for coordination since Kenai NWR lands occur in Unit 7. OSM also added the authority to “define harvest zones” to reflect how the hunt is currently being managed.

Unit 7—Goat

Unit 7—1 goat by Federal drawing permit. Nannies accompanied by kids may not be taken. Aug. 10-Nov 14.

The Seward District Ranger after coordination with ADF&G, OSM, Kenai NWR and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, and set harvest quotas, number of permits issued, and sex restrictions, and define harvest zones.

Note: OSM added the authorities to “define harvest zones” and to “set the number of permits issued” to reflect how the hunt is currently being managed and because unlimited permits are not appropriate for draw hunts.

Unit 15—Goat

Unit 15—1 goat by Federal drawing permit. Kids or nannies accompanied by kids may not be taken.

*Aug. 10-Nov.
14*

The Kenai NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, and set harvest quotas, number of permits issued, and sex restrictions, and define harvest zones.

Moose

Note: OSM reformatted the Unit 6C moose regulation for clarity and simplicity. OSM also deleted repetitive, unnecessary delegated authority language. These are administrative changes.

Also, the Unit 6 DAL for moose and deer is combined. The DAL required coordination with BLM and NPS, neither of which have lands in Unit 6C. Therefore, OSM did not specify coordination with either BLM or NPS in the unit-specific regulations below.

Unit 6—Moose

Unit 6C—1 antlerless moose by Federal drawing permit only

*Sep. 1-Oct.
31*

Permits for the portion of the antlerless moose quota not harvested in the Sep. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt

OR

1 bull by Federal drawing permit only

*Sep. 1-Dec.
31*

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. ~~The annual harvest quota will be announced by the~~

~~U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits~~

The Cordova District Ranger after coordination with ADF&G, OSM, and the Chair of affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close/reopen/adjust seasons, adjust harvest and possession limits, including sex restrictions, and close Federal public lands to all users.

Unit 6, remainder

No open season

Note: The Unit 7 moose DAL is only for the “Seward Ranger District of the Chugach National Forest.” OSM applied the delegated authority to the entire hunt area, which includes portions of Kenai NWR and the Glacier Ranger District and added the other affected land managers to the entities for coordination.

The Unit 7 moose DAL also includes the authority to “close Federal public lands to all users.” OSM did not transfer this authority into the unit-specific regulations as it has not been used by the Federal in-season manager and is no longer necessary.

Unit 7—Moose

Unit 7, remainder—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only *Aug. 20-Sep. 25*

The Seward District Ranger after coordination with ADF&G, OSM, Kenai NWR, the USFS Glacier Ranger District, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set a harvest quota and season dates, reopen/adjust seasons, adjust harvest and possession limits.

Note: OSM added Chugach National Forest to the list of entities required for coordination. Chugach National Forest was not specified in the Unit 11 DAL, but this hunt area includes USFS lands within the Chugach National Forest.

Unit 11—Moose

Unit 11, that portion south and east of a line running along the north bank of the Chitina River, the north and west banks of the Nizina River, and the west bank of West Fork of the Nizina River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain—1 bull by Federal registration permit. However, during the period Aug. 20-Sep. 20, only an antlered bull may be taken.

Aug. 20-Sep. 20.

Nov. 20-Jan. 20.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Chugach National Forest, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas and season dates for the winter season.

Note: The Unit 15 moose DAL includes the authority to “adjust harvest and possession limits, including antler restrictions.” OSM did not transfer this authority into the unit-specific regulations for the Unit 15C cow hunt given the current, one cow harvest limit in regulation, which renders that authority null and void.

The Unit 15 moose DAL also includes the authority to “close Federal public lands to all users.” OSM did not transfer this authority into the unit-specific regulations as it has not been used by the Federal in-season manager and is no longer necessary.

While not explicit in the submitted proposal, the proponent intended the authority currently in regulation for the Units 15B and 15C late fall hunt to be deleted as it is duplicative and unnecessary.

Unit 15—Moose

Unit 15A—Skilak Loop Wildlife Management Area *No open season*

Units 15A remainder, 15B, and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only *Aug. 20-Sep. 25*

The Kenai NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, adjust

harvest and possession limits, including antler restrictions, and close/reopen/adjust seasons.

Units 15B and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. ~~The Kenai NWR Refuge Manager is authorized to close the October–November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southeastern Alaska Subsistence Regional Advisory Council~~ Oct. 20–Nov. 10

The Kenai NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, adjust harvest and possession limits, including antler restrictions, and close/reopen/adjust seasons.

Unit 15C—1 cow by Federal registration permit only Aug. 20–Sep. 25

The Kenai NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas and close/reopen/adjust seasons.

Sheep

Note: The Unit 7 sheep DAL does not specify coordination with Kenai NWR, which OSM added to the authority delegated in the unit-specific regulation. OSM also added the authority to “define harvest zones” to reflect how the hunt is currently managed.

Unit 7—Sheep

Unit 7—1 ram with full curl horn or larger by Federal drawing permit Aug. 10–Sep. 20

The Seward District Ranger after coordination with ADF&G, OSM, Kenai NWR and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, set the harvest quota, number of permits issued, and define harvest zones.

Note: The Unit 15 sheep DAL does not specify coordination with the USFS Seward Ranger District, which OSM added to the authority delegated in the unit-specific regulation OSM added the authorities to “define harvest zones” and to “set the number of permits issued” to reflect how the hunt is currently being managed and because unlimited permits are not appropriate for draw hunts.

Unit 15—Sheep

Unit 15—1 ram with 3/4 curl horn or larger by Federal drawing permit Aug 10-Sep. 20

The Kenai NWR manager after coordination with ADF&G, OSM, USFS Seward Ranger District and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, set harvest quotas, number of permits issued, and define harvest zones.

Lynx

Note: The Southcentral Region has a DAL that authorizes, “The OSM director after coordination with ADF&G and the Chair of the affected Council(s) to close/open/adjust seasons and set harvest and possession limits for lynx in Units 7, 11, 13, 14, 15 and 16.” While, the rationale and origination of this DAL is uncertain, this authority has not been used for at least 10 years. OSM does not consider transferring this authority from the existing DAL into unit-specific regulations necessary or appropriate but does support rescinding this DAL.

Other Alternatives Considered

One alternative considered for moose in Unit 6 was to delegate authority to the Federal in-season manager to “close and reopen Federal public lands to nonsubsistence hunting.” A Federal public lands closure to moose hunting by non-federally qualified users from Nov. 1-Dec. 31 was recently rescinded in 2024 through WCR24-41. One of the reasons for rescission was because the DAL allowed the Federal manager to close Federal public lands to nonsubsistence users, making the codified closure redundant. However, this authority was not transferred to unit specific regulations in the submitted proposal because it is boilerplate language contained in every DAL, and closure authority is more appropriately retained by the Board (see Issue section in WP26-01 master analysis).

OSM did not further consider this alternative because 100% of antlerless moose permits are allocated to Federal harvest and the State season closes October 31. While the State has a moose hunt in codified regulations for Unit 6C from Nov. 1-Dec. 31, the State has not held an antlerless hunt in Unit 6C since 1999 because the antlerless moose quota is harvested under Federal subsistence regulations (ADF&G 2024).

Another alternative considered was to preserve the DAL conveying broad authority to manage deer in Unit 6 rather than transferring that authority into regulation. The Council and the Board may want to consider whether this authority is still necessary at all, and if it is, whether it is more appropriately retained as a DAL or in codified regulations. If it is retained as a DAL, a new DAL will need to be issued as moose and deer for Unit 6 are currently combined into one letter. Moose in Unit 6C undergo annual, routine management actions, so transferring authority into regulations for this specific hunt area is appropriate, while deer in Unit 6 do not have any routine management actions. Any in-season management action for Unit 6 deer would be a result of an unforeseen emergency situation. Therefore, a special action process would be more appropriate.

OSM CONCLUSION

Support Proposal WP26-01b with modification to retain the broad authority to manage deer in Unit 6 as a Delegation of Authority letter.

The draft regulations read:

Unit 6—Deer

*Unit 6—5 deer; however, antlerless deer may be taken only from Oct. Aug. 1-Jan. 31
1-Jan. 31. Only 1 of the 5-deer harvest limit may be taken between
Jan. 1-31*

Justification

See the WP26-01 master analysis.

Retaining the broad management authority for Unit 6 deer in a DAL is more appropriate than transferring this authority to unit-specific regulations. Actions taken in this case fall outside of routine management actions and would arise from unforeseen, emergency situations. Therefore, they should be special actions as required in the DALs.

LITERATURE CITED

ADF&G. 2024. Proposal 152. Alaska Board of Game, Statewide Regulations Meeting. Mar. 21–28, 2025. Anchorage, AK.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southcentral Alaska Subsistence Regional Advisory Council

WP26-01b: **Support as modified by SCRAC** to rescind the Unti 6 deer DAL and add the Ahtna Intertribal Resource Commission (AITRC) to the list of entities required for consultation for Unit 11 moose. (see WP26-01 master analysis for full justification)

The draft regulations read:

Unit 6—Deer

Unit 6—5 deer; however, antlerless deer may be taken only from Oct. 1-Jan. 31. Only 1 of the 5-deer harvest limit may be taken between Jan. 1-31 Aug. 1-Jan. 31

Unit 11—Moose

*Unit 11, that portion south and east of a line running along the north bank of the Chitina River, the north and west banks of the **Nizina** River, and the west bank of West Fork of the **Nizina** River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain—1 bull by Federal registration permit. However, during the period Aug. 20-Sep. 20, only an antlered bull may be taken.* Aug. 20-Sep. 20.
Nov. 20-Jan. 20.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Chugach National Forest, Ahtna Intertribal Resource Commission and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas and season dates for the winter season.

**STAFF ANALYSIS
WP26-01C – KODIAK/ALEUTIANS**

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – Kodiak/Aleutians

Caribou

Note: The DAL for caribou in Unit 9D included the authority for “any needed closures.” OSM did not transfer this authority into regulation as it is very vague, and the exact intention is uncertain (i.e. closure of Federal lands or seasons; closure to all users or nonsubsistence users).

Unit 9D—Caribou

Unit 9D—1-4 caribou by Federal registration permit only *Aug. 1-Sep. 30*

The Izembek NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, and harvest limits, including sex restrictions. *Nov. 15-Mar. 31.*

Unit 10—Caribou

Unit 10, Unimak Island only—1 bull by Federal registration permit *Aug. 1-Sep. 30.*

The Izembek NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set the harvest quota, close the season, and open/close Federal public lands to non-federally qualified users annually based on the current population status of the Unimak caribou herd.

Moose

Note: Unit 9D moose has authority already listed in unit-specific regulations as well as in an associated DAL. Since the harvest quota and management action (closing the season when the quota is met) are specified in regulation, OSM did not see a reason to require coordination of this delegated management

authority with other entities (i.e. ADF&G, OSM, Council Chairs). The authority in the DAL is to close the season, which leaves Federal lands open under State regulations. The authority in unit-specific regulations is to close Federal lands, which also closes hunting under State regulations. OSM is not proposing any changes to this regulation but supports rescinding the associated DAL as having both is unnecessary and confusing.

Unit 9D—Moose

Unit 9D—1 bull by Federal registration permit.

Dec. 15-Jan. 20

Federal public lands will be closed by announcement of the Izembek Refuge Manager to the harvest of moose when a total of 10 bulls have been harvested between State and Federal hunts.

OSM CONCLUSION

Support Proposal WP26-01c.

Justification

See the WP26-01 master analysis.

STAFF ANALYSIS

WP26-01D – BRISTOL BAY

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – Bristol Bay

Caribou

Notes: OSM combined Unit 9A and Unit 9C, that portion within the Alagnak River drainage excluding Katmai National Preserve into one hunt area to simplify regulations as the regulations are exactly the same.

The DAL for Unit 9 caribou covers the entire range of the Mulchatna Caribou Herd and requires coordination with the Nushagak Peninsula Caribou Planning Committee (Committee). As this Committee is focused on Nushagak Peninsula caribou, not Mulchatna caribou, OSM did not include it in entities required for coordination. OSM also added clarification that this delegated authority is for Mulchatna caribou, which explains why the Togiak NWR manager has been delegated authority to manage these caribou hunts. The Board delegated authority to one Federal in-season manager to streamline management of the Mulchatna Caribou Herd across its entire range.

Unit 9C, that portion draining into the Naknek River from the north, and Graveyard Creek and Coffee Creek had two DALs associated with it: one to the BLM Anchorage Field Office manager and one to the Togiak NWR manager as part of the Mulchatna caribou DAL. Delegating authority to two different Federal managers for the same hunt is not appropriate and very confusing. Therefore, OSM supports rescinding both DALs, but only transferred the authority for the Mulchatna Caribou Herd into the unit-specific regulations.

OSM added the authority to determine “the number of permits available by community” to the Unit 9C, that portion within Katmai National Preserve caribou hunt. This authority was not included in the existing DAL but is necessary for how the hunt is currently being managed.

The delegated authority for Unit 9C remainder and Unit 9E caribou are combined in one letter and requires coordination with the BLM and NPS but does not specify the specific land management units. OSM added the specific units for coordination into the unit-specific regulations below. However, there are no BLM lands in Unit 9E, so OSM removed requiring coordination with BLM for the Unit 9E caribou hunt.

Unit 9—Caribou

Units 9A, and Unit 9C, that portion within the Alagnak River drainage excluding Katmai National Preserve —up to 2 caribou by State registration permit

Season may be announced between Aug. 1-Mar. 15.

The Togiak NWR manager after coordination with ADF&G, OSM, the BLM Anchorage Field Office, the Yukon Delta NWR, Katmai National Park and Preserve, Lake Clark National Park and Preserve, and Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close seasons, and announce harvest limits, including sex restrictions for Mulchatna caribou.

Unit 9B—up to 2 caribou by State registration permit

Season may be announced between Aug. 1-Mar. 31.

The Togiak NWR manager after coordination with ADF&G, OSM, the BLM Anchorage Field Office, the Yukon Delta NWR, Katmai National Park and Preserve, Lake Clark National Park and Preserve, and Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close seasons, and announce harvest limits, including sex restrictions for Mulchatna caribou.

Unit 9C, that portion within Katmai National Preserve—1 caribou by Federal registration permit. Federal public lands are closed to the taking of caribou except by residents of Igiugig and Kokhanok hunting under these regulations

Season may be announced between Aug. 1-Sep. 30 or Nov. 1-Mar. 31.

The Katmai National Park and Preserve superintendent after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce the annual harvest quota, announce and open/close a season, determine the number of permits issued annually and the number of permits available by community, and set sex restrictions.

Unit 9C, that portion draining into the Naknek River from the north, and Graveyard Creek and Coffee Creek—up to 2 caribou by State registration permit *Season may be announced between Aug. 1-Mar. 15.*

The Togiak NWR manager after coordination with ADF&G, OSM, the BLM Anchorage Field Office, the Yukon Delta NWR, Katmai National Park and Preserve, Lake Clark National Park and Preserve, and Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close seasons, and announce harvest limits, including sex restrictions for Mulchatna caribou.

Unit 9C, remainder—1 bull by Federal registration permit or State permit. *May be announced*

Federal public lands are closed to the taking of caribou except by residents of Unit 9C and Egegik

The Alaska Peninsula/Becharof NWR Manager after coordination with ADF&G, OSM, BLM Anchorage Field Office, Katmai National Park and Preserve, and the Chair of affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close the season, and set harvest quotas.

Unit 9E—1 bull by Federal registration permit or State permit. *May be announced*

Federal public lands are closed to the taking of caribou except by residents of Unit 9C, Unit 9E, Nelson Lagoon, and Sand Point

The Alaska Peninsula/Becharof NWR Manager after coordination with ADF&G, OSM, Aniakchak National Preserve and Monument, and the Chairs of affected Councils is authorized within the regulatory parameters set by the Board, to open/close the season, and set harvest quotas.

Notes: OSM combined Units 17A, all drainages west of Right Hand Point; 17A, remainder and 17C, remainder; and Units 17B and 17C, that portion of 17C east of the Wood River and Wood River Lakes into one hunt area to simplify regulations as the regulations are exactly the same.

The DAL for Unit 17 caribou covers the entire range of the Mulchatna Caribou Herd and requires coordination with the Nushagak Peninsula Caribou Planning Committee (Committee). As this Committee is focused on Nushagak Peninsula caribou, not Mulchatna caribou, OSM did not include it in entities required for coordination. OSM also added clarification that this

delegated authority is for Mulchatna caribou, which explains why the Togiak NWR manager is required to coordinate with the other land management units specified. The Board delegated authority to one Federal in-season manager to streamline management of the Mulchatna Caribou Herd across its entire range.

Unit 17—Caribou

Units 17A and 17C, that portion of 17A east of the Ungalikthluk River and South of Buchia Ridge, and within the lower Kulukak River drainage south of Buchia Ridge and within the Kanik River drainage downstream of the Tithe Creek, that portion of 17C south of the Igushik River and south of and including the Tuklung River drainage—up to 5 caribou by Federal registration permit *Aug. 1-Mar. 31*

Public lands are closed to the taking of caribou except by federally qualified users unless the Nushagak Peninsula caribou population estimate exceeds 900 caribou

The Togiak NWR manager after coordination with ADF&G, OSM, BLM Anchorage Field Office, the Nushagak Peninsula Caribou Planning committee, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to determine the harvest quota, set the harvest limit, close the season, set the harvest areas, and determine the number of permits issued and the number of permits available by community.

Units 17A, remainder; 17B; and 17C, remainder—up to 2 caribou by State registration permit. *Season may be announced between Aug. 1 and Mar. 31.*

The Togiak NWR manager after coordination with ADF&G, OSM, the BLM Anchorage Field Office, the Yukon Delta NWR, Katmai National Park and Preserve, Lake Clark National Park and Preserve, and Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close seasons, and announce harvest limits, including sex restrictions for Mulchatna caribou.

Moose

Unit 17—Moose

Unit 17A—1 bull by State registration permit; or *Aug. 25-Sep. 25.*

1 antlerless moose by State registration permit; or

Aug. 25-Sep. 25.

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit

Up to a 31-day season may be announced between Dec. 1 and the last day of Feb.

The Togiak NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close a winter season of up to 31 days and set the harvest limit for the winter season.

OSM CONCLUSION

Support Proposal WP26-01d.

Justification

See the WP26-01 master analysis.

STAFF ANALYSIS
WP26-01E – YUKON-KUSKOKWIM DELTA

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – Yukon-Kuskokwim Delta

Caribou

Notes: OSM combined Unit 18, that portion to the east and south of the Kuskokwim River and Unit 18, remainder into one hunt area to simplify regulations as the regulations are exactly the same.

The DAL for Unit 18 caribou covers the entire range of the Mulchatna Caribou Herd and requires coordination with the Nushagak Peninsula Caribou Planning Committee (Committee). As this Committee is focused on Nushagak Peninsula caribou, not Mulchatna caribou, OSM did not include it in the entities required for coordination. OSM also added clarification that this delegated authority is for Mulchatna caribou, which explains why the Togiak NWR manager has delegated authority to manage these caribou hunts. The Board delegated authority to one Federal in-season manager to streamline management of the Mulchatna Caribou Herd across its entire range.

Unit 18—Caribou

Unit 18—up to 2 caribou by State registration permit

Season may be announced between Aug. 1-Mar. 15.

The Togiak NWR manager after coordination with ADF&G, OSM, the BLM Anchorage Field Office, the Yukon Delta NWR, Katmai National Park and Preserve, Lake Clark National Park and Preserve, and Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close seasons, and announce harvest limits, including sex restrictions for Mulchatna caribou.

Moose

Note: The DAL for moose in the Kuskokwim River hunt area does not require coordination with the BLM Anchorage Field Office. OSM added the BLM Anchorage Field Office to the entities required for coordination since some BLM lands occur in this hunt area.

The DAL for moose in Unit 18 that portion that drains into Kuskokwim Bay south of Carter Bay drainage reads, “Unit 18, Goodnews River drainage south to the Unit 18 boundary” because the hunt area changed in regulation but was not updated in the associated DAL.

Unit 18—Moose

Unit 18, that portion east of a line running from the mouth of the Ishkowiak River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W 162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage—1 antlered bull by State registration permit during the fall season Sep. 1-Oct. 15.

OR

Up to 1 moose by Federal permit during a may-be-announced winter season May be announced between Dec. 1-Jan. 31.

Federal public lands are closed to the taking of moose except by residents of Akiachak, Akiak, Atmoutlaur, Bethel, Eek, Kalskag, Kasigluk, Kipnuk, Kongiganak, Kwethluk, Kwigillingok, Lower Kalskag, Napakiak, Napaskiak, Nunapitchuk, Oscarville, Quinhagak, Tuluksak, and Tuntutuliak.

The Yukon Delta NWR manager after coordination with ADF&G, the BLM Anchorage Field Office, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to determine annual harvest quotas, close the fall season, open/close a winter season, announce sex and antler restrictions for the winter hunt, and determine the permit allocation system on an annual basis, including the number of permits issued through a limited registration or random drawing hunt.

Unit 18, that portion that drains into Kuskokwim Bay south of Carter Bay drainage—1 antlered bull by State registration permit Sep. 1-30

OR

1 moose by State registration permit

The Togiak NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close the fall season, and open/close a winter season.

A season may be announced between Dec. 1 and the last day of Feb.

OSM CONCLUSION

Support Proposal WP26-01e.

Justification

See the WP26-01 master analysis.

STAFF ANALYSIS WP26-01F – WESTERN INTERIOR

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – Western Interior

Caribou

Note: The DAL for Unit 19 caribou covers the entire range of the Mulchatna Caribou Herd and requires coordination with the Nushagak Peninsula Caribou Planning Committee (Committee). As this Committee is focused on Nushagak Peninsula caribou, not Mulchatna caribou, OSM did not include it in the entities required for coordination. OSM also added clarification that this delegated authority is for Mulchatna caribou, which explains why the Togiak NWR manager has delegated authority to manage these caribou hunts. The Board delegated authority to one Federal in-season manager to streamline management of the Mulchatna Caribou Herd across its entire range.

Unit 19—Caribou

Units 19A, 19B, and 19E (excluding rural Alaska residents of Lime Village)—up to 2 caribou by State registration permit

Season may be announced between Aug. 1-Mar. 15.

The Togiak NWR manager after coordination with ADF&G, OSM, the BLM Anchorage Field Office, the Yukon Delta NWR, Katmai National Park and Preserve, Lake Clark National Park and Preserve, and Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close seasons, and announce harvest limits, including sex restrictions for Mulchatna caribou.

Note: OSM changed the season from “to be announced” to “may be announced” as this season has not been announced for years. OSM considers this an administrative change.

Unit 21D—Caribou

Unit 21D, north of the Yukon River and east of the Koyukuk River—caribou may be taken during a winter season to be announced.

Winter season ~~to~~ may be announced.

The Koyukuk/Nowitna/Innoko NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is

authorized within the regulatory parameters set by the Board, to open/close seasons, to set harvest limits and announce season dates.

Moose

Note: The existing DAL is for moose in Unit 19A, remainder. However, Unit 19A was split into two subunits: Unit 19A and Unit 19E in 2024. However, this change was not reflected in the existing DAL. Therefore, the authority now applies to Unit 19A (instead of Unit 19A, remainder).

The existing Unit 19A moose DAL also just specifies coordination with BLM. OSM clarified coordination should be with the BLM Anchorage Field Office.

Unit 19A—Moose

Unit 19A—1 antlered bull by Federal drawing permit or a State permit. Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations. Sep. 1-20

The Yukon Delta NWR manager after coordination with ADF&G, OSM, the BLM Anchorage Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set annual harvest quotas and the number of permits issued, and to close the hunt early if the quota is reached.

Note: OSM combined the fall and winter hunts for Unit 21B, that portion within the Nowitna NWR downstream from and including the Little Mud River to simplify regulations and reduce confusion since these hunts are in the same hunt area. OSM also changed the winter season in Unit 21B from “to be announced” to “may be announced” as this season is not announced every year. OSM considers these administrative, housekeeping changes.

Similarly, for all the Unit 21D moose regulations, OSM reformatted the regulations for clarity, and changed the “to be announced” seasons to “may be announced” seasons as they are not announced every year. OSM considers these administrative changes. The Unit 21D moose regulations also have authority already listed in the unit-specific regulations as well as in the associated DAL. Having duplicate delegated authority is not appropriate, so OSM removed the duplication when transferring the DAL authority into the unit-specific regulations. Finally, the Unit 21D moose DALs only specified coordination is required with the BLM. OSM clarified coordination should be with the BLM Central Yukon Field Office. In Unit 21D, remainder, OSM also removed some unnecessary, repetitive regulatory language regarding permit requirements to simplify regulations.

Unit 21—Moose

Unit 21B, that portion within the Nowitna National Wildlife Refuge downstream from and including the Little Mud River drainage—1 bull. A State registration permit is required Sep. 5-25. A Federal registration permit is required Sep. 26-Oct. 1 *Sep. 5-Oct. 1*

OR

1 antlered bull. A Federal registration permit is required during the 5-day season and will be limited to one per household. *Five-day season ~~to~~ may be announced between Dec. 1 and Mar. 31*

The Koyukuk/Nowitna/Innoko NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set season dates.

Unit 21D, Koyukuk Controlled Use Area—1 bull by State registration permit *Sep. 1-25.*

OR

1 antlerless moose by Federal permit ~~if authorized by announcement by the Koyukuk/Nowitna/Innoko NWR manager.~~ Harvest of cow moose accompanied by calves is prohibited. ~~A harvestable surplus of cows will be determined for a quota.~~ **AND**
Mar. 1-5 season ~~to~~ may be announced

OR

1 antlered bull by Federal permit, if there is no Mar. 1-5 season ~~and if authorized by announcement by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon field office manager.~~ *Apr. 10-15 season ~~to~~ may be announced.*

The Koyukuk/Nowitna/Innoko NWR manager after coordination with ADF&G, OSM, the BLM Central Yukon Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce season dates, harvest quotas and sex restrictions.

Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek—1 moose by State registration permit. Antlerless moose may be taken only during Sep. 21-25 season if authorized ~~jointly by the Koyukuk/Nowitna/Innoko NWR Manager and the BLM Central Yukon Field Office Manager.~~ Antlerless moose may be *Aug. 22-31.*
Sep. 5-25.
Mar. 1-31 season ~~to~~ may be announced.

harvested during the winter season. Harvest of cow moose accompanied by calves is prohibited.

The Koyukuk/Nowitna/Innoko NWR manager after coordination with ADF&G, OSM, the BLM Central Yukon Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce season dates, harvest quotas and sex restrictions.

<p>Unit 21D, remainder—1 moose by State registration permit. Antlerless moose may be taken only during Sep. 21-25 and the Mar. 1-5 season if authorized if authorized jointly by the Koyukuk/Nowitna/Innoko NWR Manager and the BLM Central Yukon Field Office Manager. Harvest of cow moose accompanied by calves is prohibited. During the Aug. 22-31 and Sep. 5-25 seasons, a State registration permit is required. During the Mar. 1-5 season, a Federal registration permit is required.</p>	<p>Aug. 22-31. Sep. 5-25. Mar. 1-5 season may be announced</p>
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The Koyukuk/Nowitna/Innoko NWR manager after coordination with ADF&G, OSM, the BLM Central Yukon Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce season dates, harvest quotas and sex restrictions.

Sheep

The Unit 19C sheep regulations have authority delegated in the unit-specific regulations as well as in an associated DAL. Having duplicate delegated authority is not appropriate, so OSM removed the duplication when transferring the DAL authority into the unit-specific regulations.

Unit 19C—Sheep

<p>Unit 19C, (residents of Nikolai only) that portion within the Denali National Park and Preserve—Community harvest quota set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only.</p>	<p>Oct. 1-Mar. 30</p>
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The Denali National Park and Preserve superintendent after coordination with ADF&G, OSM, the Chair of the Denali Subsistence Resource Commission, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to open/close the season and set harvest quotas.

OSM CONCLUSION

Support Proposal WP26-01f.

Justification

See the WP26-01 master analysis.

**STAFF ANALYSIS
WP26-01G – SEWARD PENINSULA**

Introduction

Please see the WP26-01 master analysis for the Issues, Discussion, Regulatory History, and Effects sections.

Proposed Federal Regulations – Seward Peninsula

Caribou

Unit 22—Caribou

Units 22A, that portion north of the Golsovia River drainage, 22B remainder, July 1-June 30 that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E, that portion east of and including the Tin Creek drainage—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken.

Unit 22A, remainder—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken. July 1-June 30, season may be announced.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce season dates.

Unit 22B, that portion west of Golovnin Bay and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken. Oct. 1-Apr. 30. May 1-Sep. 30, season may be announced.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce a season between May 1 and Sept. 30.

Unit 22D, that portion in the Pilgrim River drainage—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken. Oct. 1-Apr. 30. May 1-Sep. 30,

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, Bering Land Bridge National Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce a season between May 1 and Sept. 30.

season may be announced.

Units 22C, 22D remainder, 22E remainder—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken.

July 1-June 30, season may be announced.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, Bering Land Bridge National Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce season dates.

Moose

Note: OSM reformatted the Unit 22D, remainder moose regulations for clarity and simplicity. This is a housekeeping, administrative change.

Unit 22—Moose

Unit 22D, remainder—1 bull by State registration permit.

Aug. 10-Sep. 14

OR

1 antlered bull by State registration permit.

Dec. 1-Jan. 31, season may be announced.

Federal public lands are closed to the harvest of moose except by federally qualified subsistence users.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas, close the fall season if the quota is met, and open a season between Dec. 1 and Jan. 31.

Muskox

Unit 22—Muskox

Unit 22B—1 bull by Federal drawing permit or State permit.

Aug. 1-Mar. 15

Federal public lands are closed to the taking of muskox except by federally qualified subsistence users hunting under these regulations.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, the Bering Land Bridge National Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

Unit 22D, that portion west of the Tisuk River drainage and Canyon Creek—1 bull by Federal drawing permit or State permit. Sep. 1-Mar. 15

Federal public lands are closed to the harvest of muskox except by residents of Nome and Teller hunting under these regulations.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, the Bering Land Bridge National Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

Unit 22D, that portion within the Kuzitrin River drainages—1 bull by Federal drawing permit or State permit. Aug. 1-Mar. 15

Federal public lands are closed to the taking of muskox except for residents of Council, Golovin, White Mountain, Nome, Teller, and Brevig Mission hunting under these regulations.

The Bering Land Bridge National Preserve superintendent after coordination with ADF&G, OSM, the BLM Anchorage Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

Unit 22D, remainder—1 bull by Federal drawing permit or State permit. Aug. 1-Mar. 15

Federal public lands are closed to the taking of muskox except by residents of Elim, White Mountain, Nome, Teller, and Brevig Mission hunting under these regulations.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, the Bering Land Bridge National Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

Unit 22E—1 bull by Federal drawing permit or State permit.

Aug. 1-Mar. 15

Federal public lands are closed to the harvest of muskox except by federally qualified subsistence users hunting under these regulations.

The Bering Land Bridge National Preserve superintendent after coordination with ADF&G, OSM, the BLM Anchorage Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

OSM CONCLUSION

Support Proposal WP26-01g.

Justification

See the WP26-01 master analysis.

**STAFF ANALYSIS
WP26-01H – NORTHWEST ARCTIC**

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – Northwest Arctic

Muskox

Note: The scope of delegated authority for all of the Unit 22 and 23 muskox hunts was standardized via Proposal WP24-27. However, the authority to determine “the method of permit allocation between State and Federal permits” is not necessary for Unit 23, Cape Krusenstern National Monument (CAKR) since National Monuments are closed to anyone hunting under State regulations. Therefore, OSM did not transfer that authority into the unit specific regulations.

OSM also removed the requirement to coordinate with the NPS Regional Office for Unit 23, CAKR and Unit 23, north and west of the Kobuk River drainage. OSM added the BLM Arctic District Office to the entities for coordination for the muskox hunt in Unit 23, north and west of the Kobuk River drainage since BLM has lands in the northwestern corner of Unit 23.

Unit 23—Muskox

Unit 23, south of Kotzebue Sound and west of and including the Buckland River drainage—1 bull by Federal drawing permit or State permit. Aug. 1-Mar. 15.

The BLM Anchorage Field Office manager after coordination with ADF&G, OSM, the Bering Land Bridge National Preserve, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

Unit 23, Cape Krusenstern National Monument—1 bull by Federal drawing permit. Aug. 1-Mar. 15.

The Western Arctic National Parklands superintendent after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas and the number of permits to be issued.

Unit 23, that portion north and west of the Kobuk River drainage—1 bull by State permit or Federal drawing permit. Aug. 1-Mar. 15

The Western Arctic National Parklands superintendent after coordination with ADF&G, OSM, the BLM Arctic District Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to close the season, determine annual harvest quotas, the number of permits to be issued, and the method of permit allocation between State and Federal permits.

Sheep

Note: The DAL for sheep in Unit 23 specifies setting harvest limits. However, as the harvest limit for all Unit 23 sheep hunts is “one sheep,” OSM clarified this authority includes setting sex and horn-curl restrictions.

Also, the Unit 23 sheep DAL only specifies coordination with BLM. OSM clarified coordination should be with the BLM Anchorage Field Office.

Unit 23—Sheep

Unit 23, south of Rabbit Creek, Kiyak Creek, and the Noatak River, and west of the Cutler and Redstone Rivers (Baird Mountains)—1 sheep by Federal registration permit. May be announced.

Federal public lands are closed to the taking of sheep except by federally qualified subsistence users hunting under these regulations.

The Western Arctic National Parklands superintendent after coordination with ADF&G, OSM, Gates of the Arctic National Park and Preserve, BLM Anchorage Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set season dates and set or adjust annual harvest quotas and harvest limits, including sex and horn-curl restrictions.

Unit 23, north of Rabbit Creek, Kiyak Creek, and the Noatak River, and west of the Aniuk River (DeLong Mountains)—1 sheep by Federal registration permit. May be announced.

The Western Arctic National Parklands superintendent after coordination with ADF&G, OSM, Gates of the Arctic National Park and Preserve, BLM Anchorage Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set season dates and set or

adjust annual harvest quotas and harvest limits, including sex and horn-curl restrictions.

Unit 23, remainder (Schwotka Mountains) except for that portion within Gates of the Arctic National Park and Preserve—1 sheep by Federal registration permit. May be announced.

The Western Arctic National Parklands superintendent after coordination with ADF&G, OSM, Gates of the Arctic National Park and Preserve, BLM Anchorage Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set season dates and set or adjust annual harvest quotas and harvest limits, including sex and horn-curl restrictions.

OTHER ALTERNATIVES CONSIDERED

One alternative considered for sheep in Unit 23 was to delegate authority to the Federal in-season manager to “close and reopen Federal public lands to nonsubsistence hunting.” Currently, Federal public lands in the Baird Mountains hunt area are closed to sheep hunting by non-federally qualified users, while the Schwotka and DeLong mountains hunt areas do not have codified closures. Wildlife Closure Review WCR26-18 is reviewing the Baird Mountains closure, and OSM’s current recommendation is to rescind the closure, in part, because the WEAR Superintendent has authority to close Federal lands to non-federally qualified users if necessary.

However, this authority was not transferred to unit specific regulations in the submitted proposal because it is boilerplate language contained in every DAL, and closure authority is more appropriately retained by the Board (see Issue section in WP26-01 master analysis). OSM did not further consider this alternative because the State sheep hunt has been closed since 2014.

OSM CONCLUSION

Support Proposal WP26-01h.

Justification

See the WP26-01 master analysis.

STAFF ANALYSIS WP26-01I – EASTERN INTERIOR

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – Eastern Interior

Caribou

Unit 12—Caribou

Unit 12, that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 bull by Federal registration permit only Aug. 10-Sep. 30

Federal public lands are closed to the harvest of caribou except by federally qualified subsistence users hunting under these regulations.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Tetlin NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set or open/close the season, announce the harvest quota, and the number of permits.

Note: The DAL for Fortymile caribou just specified coordination with United States Fish and Wildlife Service (USFWS) and NPS. OSM clarified that coordination should be with Yukon-Charley Rivers National Preserve and Yukon Flats NWR. OSM also added clarification that this delegated authority is for Fortymile caribou, which explains why the BLM Eastern Interior Field Office manager is required to coordinate with the other land management units specified. The Board delegated authority to one Federal in-season manager to streamline management of the Fortymile Caribou Herd across its entire range.

The DAL for Fortymile caribou just specified Unit 20F. However, given the current regulations and recent in-season management actions, the delegated authority should *not* apply to Unit 20F, north of the Yukon River. This DAL also delegated authority to modify or restrict methods and means. OSM is not aware of this authority ever being used and therefore, did not transfer it into the unit specific regulations.

Unit 20—Caribou

Unit 20E—up to 3 caribou, to be announced, by a joint State/Federal registration permit

Fall season between Aug. 1 and Sep. 30, to be announced.

The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict harvest limits, including sex restrictions, and season dates for Fortymile caribou.

Winter season between Oct. 21 and Mar. 31, to be announced.

Unit 20F, north of the Yukon River—1 caribou

Aug. 10-Mar. 31

Unit 20F, east of the Dalton Highway and south of the Yukon River—up to 3 caribou, to be announced, by a joint State/Federal registration permit.

Fall season between Aug. 1 and Sep. 30, to be announced.

The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict harvest limits, including sex restrictions, and season dates for Fortymile caribou.

Winter season between Oct. 21 and Mar. 31, to be announced.

Unit 25—Caribou

Unit 25C—up to 3 caribou, to be announced, by a joint Federal/State registration permit.

Fall season between Aug. 1 and Sep. 30, to be announced.

The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict harvest limits, including sex restrictions, and season dates for Fortymile caribou.

Winter season between Oct. 21 and Mar. 31, to be announced.

OSM CONCLUSION

Support Proposal WP26-01i.

Justification

See the WP26-01 master analysis.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Eastern Interior Alaska Subsistence Regional Advisory Council

WP26-01i: **Support as modified by EIRAC** to add Ahtna Intertribal Resource Commission and Tanana Chiefs Conference (TCC) Tribal Resources Stewardship Department to list of entities to coordinate with for Unit 12 caribou; add Eastern Interior Council members who serve on the Fortymile Caribou Herd Harvest Management Coalition and TCC Tribal Resources Stewardship Department to list of entities to coordinate with and add authority to set harvest quota and define harvest area for Units 20 & 25 caribou. (See WP26-01 master analysis for full justification).

The draft regulations read:

Unit 12—Caribou

Unit 12, that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 bull by Federal registration permit only Aug. 10-Sep. 30

Federal public lands are closed to the harvest of caribou except by federally qualified subsistence users hunting under these regulations.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Tetlin NWR, Ahtna Intertribal Resource Commission, Tanana Chiefs Conference Tribal Resources Stewardship Department, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set or open/close the season, announce the harvest quota, and the number of permits.

Unit 20—Caribou

Unit 20E—up to 3 caribou, to be announced, by a joint State/Federal registration permit Fall season between Aug. 1 and Sep. 30, to be announced.

The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, Eastern Interior Council members who serve on the Fortymile Caribou Herd Harvest Management Coalition, Tanana Chiefs Conference Tribal Resources Stewardship Department, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict season dates and harvest limits, including sex restrictions, set harvest quotas, and define harvest areas for Fortymile caribou.

Winter season between Oct. 21 and Mar. 31, to be announced.

Unit 20F, north of the Yukon River—1 caribou

Aug. 10-Mar. 31

Unit 20F, east of the Dalton Highway and south of the Yukon River—up to 3 caribou, to be announced, by a joint State/Federal registration permit.

Fall season between Aug. 1 and Sep. 30, to be announced.

The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, Eastern Interior Council members who serve on the Fortymile Caribou Herd Harvest Management Coalition, Tanana Chiefs Conference Tribal Resources Stewardship Department, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict season dates and harvest limits, including sex restrictions, set harvest quotas, and define harvest areas for Fortymile caribou.

Winter season between Oct. 21 and Mar. 31, to be announced.

Unit 25—Caribou

Unit 25C—up to 3 caribou, to be announced, by a joint Federal/State registration permit.

Fall season between Aug. 1 and Sep. 30, to be announced.

The BLM Eastern Interior Field Office manager after coordination with ADF&G, OSM, Yukon-Charley Rivers National Preserve, Yukon Flats NWR, Eastern Interior Council members who serve on the Fortymile Caribou Herd Harvest Management Coalition, Tanana Chiefs Conference Tribal Resources Stewardship Department, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to modify or restrict season dates and harvest limits, including sex restrictions, set harvest quotas, and define harvest areas for Fortymile caribou.

Winter season between Oct. 21 and Mar. 31, to be announced.

**STAFF ANALYSIS
WP26-01J – NORTH SLOPE**

Introduction

Please see the WP26-01 master analysis for the Issues, Proponent Statement, Regulatory History, and Discussion and Effects sections.

Proposed Federal Regulations – North Slope

Moose

Unit 26—Moose

*Units 26B, remainder and 26C—1 moose by Federal registration permit May be announced
by residents of Kaktovik only.*

*Federal public lands are closed to the taking of moose except by a
Kaktovik resident holding a Federal registration permit and hunting
under these regulations*

***The Arctic NWR manager after coordination with ADF&G, OSM, the
BLM Arctic Field Office, and the Chair of the affected Council(s) is
authorized within the regulatory parameters set by the Board, to set or
adjust annual harvest quotas, set any needed sex restrictions, determine
the number of permits issued, and set season dates.***

Muskox

Unit 26—Muskox

*Unit 26A, that portion west of the eastern shore of Admiralty Bay where the Aug. 1-Mar. 15
Alaktak River enters, following the Alaktak River to 155°00' W longitude
south to the Unit 26A border—1 muskox by Federal drawing permit*

***The BLM Arctic District Office manager after coordination with ADF&G,
OSM, and the Chair of the affected Council(s) is authorized within the
regulatory parameters set by the Board, to close the season, and determine
annual harvest quotas, the number of permits issued, and the method of
permit allocation between State and Federal permits.***

Unit 26C—1 muskox by Federal registration permit only

*May be
announced
between
July 15-Mar. 31*

Public lands are closed to the taking of muskox, except by rural Alaska residents of the village of Kaktovik hunting under these regulations

The Arctic NWR manager after coordination with ADF&G, OSM, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to announce season dates, determine the number of permits issued annually, and set sex restrictions.

Sheep

Note: The DAL for sheep in Unit 26A specifies setting harvest limits. However, as the harvest limit for the Unit 26A sheep hunt is “one sheep”, OSM clarified this authority includes setting sex and horn-curl restrictions.

Also, the Unit 26A sheep DAL only specifies coordination with BLM. OSM clarified coordination should be with the BLM Arctic Field Office. The Western Arctic National Parklands (WEAR) superintendent has delegated authority for sheep in Unit 26A because the Units 23 and 26A sheep hunts were combined in one DAL as the sheep populations cross unit boundaries. OSM retained the WEAR superintendent as the Federal in-season manager for sheep in Unit 26A to maintain consistency in sheep population management.

Unit 26A—Sheep

Unit 26A, that portion west of Howard Pass and the Etivluk River (DeLong Mountains)—1 sheep by Federal registration permit

*Season may be
announced.*

The Western Arctic National Parklands superintendent after coordination with ADF&G, OSM, Gates of the Arctic National Park and Preserve, BLM Arctic Field Office, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set season dates and set or adjust annual harvest quotas and harvest limits, including sex and horn-curl restrictions.

OSM FSCONCLUSION

Support Proposal WP26-01j.

Justification

See the WP26-01 master analysis.