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FEDERAL SUBSISTENCE BOARD

REGULATORY MEETING

VOLUME II

EGAN CONVENTION CENTER

Anchorage, Alaska

April 22, 2026

MEMBERS PRESENT:

Anthony Christianson, Chairman
Raymond Oney, Public Member
Benjamin Payenna, Public Member
Rhonda Pitka, Public Member
Frank Woods, Public Member
Sara Boario, U.S. Fish and Wildlife Service
Jeremiah Ingersoll, U.S. Forest Service
Jolene John, Bureau of Indian Affairs
Kevin Pendergast, Bureau of Land Management
Don Striker, National Park Service

Interior Solicitor, Lisa Doehl

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P R O C E E D I N G S

(Anchorage, Alaska - 4/22/2026)

(On record)

CHAIRMAN CHRISTIANSON: All right. Good morning. We're going to go ahead and get started this morning with the Federal Subsistence Board wildlife meeting. Welcome and first off this morning we're going to go ahead and start with the public comment period on non-agenda items. This is an opportunity for the public and tribes and others to speak to items that might be of interest to the Board, but that are not placed on the agenda. And so we do have I think green cards are they today? No, they're green, they're not blue. So we have green cards over here if you want to be recognized or Robbin has them and we'll call you in the order of. So appreciate that. This is your opportunity this morning to speak to non-agenda items. If you'd like to be recognized online please wave your hand.

Thank you.

MS. LAVINE: Mr. Chair, the first card we have is from Mr. Tom Harris. Is Mr. Tom Harris in the room, I believe he signed up yesterday.

(No comments)

MS. LAVINE: Mr. Tom Harris.

(No comments)

MS. LAVINE: Mr. Chair, we have a Grant Kopplin online.

Grant Kopplin, please address the Board.

(No comments)

MS. LAVINE: So we understand that there are some folks online who are having problems hearing. Can we have people online say -- check in and say yep, we can hear you or -- and if you can't you'll just say no, nothing.

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1 Thank you.

2

3 UNIDENTIFIED VOICE: We can hear you.

4

5 MS. LAVINE: Thank you. Grant Kopplin,
6 please address the Board.

7

8 MR. KOPPLIN: Thank you. Sorry about
9 the technical difficulties there, but I can hear you
10 guys now and I'm glad I'm able to give my comments
11 still.

12

13 My name's Grant Kopplin. Thank you
14 very much for allowing me to give public comment this
15 morning. I'm giving comment today as an Alaska
16 resident from Palmer who lives in a more urban setting,
17 but whose family actively strives to live a subsistence
18 based lifestyle. The fish and game we harvest are not
19 supplemental, they are what we rely on to feed our
20 family. I'm not alone in this, there are many families
21 in communities like mine who depend on these same
22 resources despite not living in a designated rural
23 area. Like many Alaskans we rely on access to public
24 resources and land to maintain a way of life that is
25 deeply meaningful to us and our families.

26

27 I do want to be clear that I recognize
28 the need to prioritize rural subsistence users. I
29 support more liberal seasons and bag limits for those
30 communities when approp -- and when appropriate I
31 understand that closure may at times be biologically
32 necessary. However I respectfully ask that closures be
33 implemented with careful and deliberate consideration
34 and just as important that they be rescinded when the
35 resources can support additional harvest.

36

37 Under the dual -- under the current
38 dual management system we have in Alaska and it often
39 feels like Alaskans are being pitted against other
40 Alaskans. When closures are implemented on public
41 lands they can affect a lot of other residents across
42 the state who also depend on these public resources on
43 public lands. At the same time many rural communities
44 already have access to surrounding tribal or private
45 lands that non-local users cannot access. These areas
46 inherently provide reduced competition for these rural
47 communities and rural users.

48

49 Before restricting access for other

50

1 Alaska residents I strongly urge the Board to first
2 consider limiting non-resident, AKA out of State
3 hunters. That is the user group that we should be
4 regulating first when conservation concerns are --
5 arise. If current regulations do not allow for the
6 Board to do that then that is something that I feel
7 should be reevaluated. Greater coordination with the
8 Alaska Department of Fish and Game and the Alaska Board
9 of Game could help implement targeted, effective
10 restrictions on non-Native participation before
11 reducing opportunity for other Alaskan residents.

12

13 I also ask that the Regional Advisory
14 Councils dive into the data for their areas when
15 concerns of crowding arise and see what the non-
16 resident hunter numbers are. I bet it's higher than
17 one would think and it's happening all over the state
18 and all Alaskans are feeling that extra pressure. I
19 ask the RACs to work with the Board of Game to help
20 manage this problem while maintaining opportunity for
21 other Alaskans.

22

23 I am personally working on proposals to
24 better manage non-resident hunting pressure in areas
25 such as the lower Yukon River and central Brooks Range.
26 I believe these types of solutions focus on managing
27 demand and participation rather than broadly removing
28 opportunity or a more balanced path moving forward.

29

30 Additionally I encourage the Board to
31 consider tools that can actively help rebuild wildlife
32 populations such as predator management where
33 appropriate. I understand there are limitations on
34 Federal lands, but there are areas that represent
35 excellent habitat that are currently held in a predator
36 pit. Thoughtful science based predator management
37 could make a meaningful difference in rebuilding
38 ungulate populations and supporting long term
39 subsistence opportunity. Typically Federal agencies
40 have been opposed to such practices or believe they're
41 unnecessary, but there are a lot of cases when this was
42 implemented on State land where they were extremely
43 successful.

44

45 Ultimately I believe maintaining
46 sustainable access for all Alaskans is critical. When
47 more residents are able to responsibly engage with the
48 land, fish and wildlife more people develop a deep
49 connection to these resources. That connection builds

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1 a stronger, broader constituency that will fight to
2 protect Alaska's land and wildlife for future
3 generations. If we begin dividing Alaskans based on
4 where they live when it's not biologically necessary we
5 risk disconnecting people from the resource. That
6 division not only weakens individual opportunity, it
7 weakens all of us collectively. When Alaskans are
8 pitted against each other we lose the unified voice
9 that has more influence in protecting our lands, fish
10 and wildlife. Over time being divided and taking
11 opportunity away from other Alaska residents could lead
12 to fewer people advocating for its protection making it
13 more vulnerable to pressures like development or
14 competing uses. A united Alaska, rural and non-rural
15 together is far stronger of an advocate for
16 conservation than a divided one. To put that into a
17 possible real world outcome let's say I take my wife
18 and two daughters on a float or jet boat ride up the
19 Kobuk or Noatak River one day to enjoy the country and
20 potentially harvest maybe two bull caribou for us to
21 eat throughout the winter. Will that have a biological
22 impact on the Western Arctic Caribou Herd, most likely
23 not. Will we have brought maybe some economic stimulus
24 into the area by paying locals for help to get to and
25 from the airport or potentially a boat rental or
26 whatever logistical support we might need to facilitate
27 that family trip, probably. Will we have made amazing
28 family memories along the way, I sure hope so.

29
30 Fast forward to maybe 30 years later
31 and someone in the future wants to build a road, maybe
32 build a pipeline, mine critical minerals near the area,
33 well, now my family and my daughters' future families
34 will think back to the land and people and resources
35 and have a tangible connection and be an advocate to
36 protect these places. Without ever having had the
37 privilege to experience and harvest and connect in the
38 area, maybe the Western Arctic Caribou Herd and western
39 Brooks Range feels like another country that they were
40 never allowed to experience so what's it matter to them
41 if they need to mine copper from the headwaters of the
42 Kobuk or whatever other drainage may be at risk in the
43 future to development or competing uses.

44
45 I thank you all. Hope you understand
46 the point I'm trying to make that when other Alaskans
47 are able to utilize and appreciate these areas and land
48 and resources it's ultimately going to just build a
49 bigger base of people to advocate and protect these
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1 places.

2 So moving forward I just respectfully ask the
3 Board to pursue solutions that promote unity,
4 cooperation, and shared stewardship between Federal and
5 State managers and between rural and non-rural
6 Alaskans. We all care deeply about these resources and
7 we're stronger when we work together to protect them.

8
9 Thank you for your time and
10 consideration. And again I'm just asking that moving
11 forward when considering closures or potentially
12 reopening opportunity for others that we're doing so
13 out of a place -- out of concern whether it's
14 biologically necessary or if it's just an attempt to
15 keep other people out. And I just want you guys to
16 know and think about there's lots of other Alaska
17 residents that are going to be negatively impacted by
18 these decisions and that I think dividing us when
19 unnecessary is just going to create future problems
20 down the line. So thank you for the Board and
21 everybody in the meeting today for allowing me to speak
22 and give you my comments though.

23
24 Thank you for your time.

25
26 CHAIRMAN CHRISTIANSON: Thank you.
27 Appreciate that, Grant, and appreciate you taking the
28 time to call in and share your concerns.

29
30 Anyone from the Board, any questions.

31
32 Oh, Frank.

33
34 MR. WOODS: Yeah, you mentioned the
35 dual management process in Alaska, we manage resource
36 for all Alaska on the State side and rural preference
37 for Federal lands. The definition of that is really
38 critical because number 1 this Board has to represent
39 the rural preference subsistence priority and if
40 subsistence isn't doing well nobody's doing well. Just
41 because I live in Alaska doesn't entitle me the right
42 to go wherever I want to. That entitlement is gone.
43 Every piece of land and every piece of property is now
44 spoke -- I work in the land department day job and we
45 go in the recorder's office and that recorder's office
46 is so busy they can't keep up with land transfers. If
47 you look at every community and every economic driver
48 in this state the commercial fishery industry is taken
49 up by non-residents who are not separating people, this
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1 is not a -- this is not a statement to separate and
2 divide our people in the state of Alaska. Alaska --
3 State of Alaska now manages for the sports, the
4 recreation, the guide industry and those guides and
5 State and commercial fisheries are about 70 to 80 if
6 not 90 percent owned by non-residents of Alaska.

7

8 Number 2, the economic in this whole
9 thing we are now fully engaged in the westernization as
10 Alaska's grown-up. The corporate structure is hitting
11 Alaska to its fullest, we are the last frontier to
12 invest in, grab market share and utilize resource.
13 Just because I live in Alaska doesn't entitle me to go
14 wherever I need to. We forget that we have to work
15 together and help and protect and manage a Alaska
16 resource for all Alaskans, not just for who I choose or
17 not who I decide to side with or not what career I end
18 up. I'm a commercial fisherman, I'm also a resident of
19 Alaska. I was a guide for six years. I'm also a
20 subsistence user. So those many hats have to be
21 delineated in meetings like this and I -- I applaud you
22 for trying to keep us together and the best way we can
23 do that is keep at the table and keep working.

24

25 Thank you for your comments, I
26 appreciate it.

27

28 Thank you.

29

30 CHAIRMAN CHRISTIANSON: Thank you. And
31 again thank you, Grant, for calling in. Is there --
32 the next card that we'd call on.

33

34 MS. LAVINE: Thank you, Mr. Chair. In
35 the room the next person to testify is Craig Chythlook.

36

37 Craig, please address the Board.

38

39 MR. CHYTHLOOK: Good morning. Sorry, I
40 didn't hear my name, there was a side conversation and
41 I totally missed it.

42

43 Yeah, thank you, everybody. Mr. Chair,
44 members of the Board, it's an honor to be here.
45 Definitely wanting to start out as my boss did
46 yesterday with the recognition of our elders, our
47 leaders and continue to thank them for all of their
48 years of creating this path, paving the way for our
49 meaningful engagement and participation and just
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1 creating that clear vision for organizations like the
2 one I'm currently representing, giving that opportunity
3 for us to continue the work.

4

5 So good morning again, members of the
6 Board. My name is Craig Chythlook. I'm the Executive
7 Director of the Yukon River and Tribal Fish Commission.
8 A little bit of background about myself. I'm, Yup'ik,
9 my Yup'ik name is Kaviak and sitting behind me are my
10 parents, Joe and Molly Chythlook that we got to meet
11 and be so graciously recognized by Member Woods and
12 very happy and honored to be here and that they're my
13 folks and that we're all from Bristol Bay and we've
14 been there for a long time.

15

16 Really thankful and grateful for having
17 the opportunity to speak on non-agenda item. I'm
18 thinking about fisheries at a wildlife meeting. I
19 think I was really listening carefully and
20 intentionally yesterday about the different regional
21 reports and thinking about the discussion and listening
22 to the debate regarding the proposals. And one of the
23 things that was very obvious to my parents is how
24 important salmon are to everyday life, to every chapter
25 of our life. So just really grateful to be here.

26

27 I would just like to share a little bit
28 about our organization. This is really a time to kind
29 of introduce our Fish Commission and our growing
30 excitement to continue to participate here at the FSB.

31

32

33 So the Yukon River and Tribal Fish
34 Commission is currently comprised of 44 member tribes
35 authorized by tribal resolution whose mission is to
36 protect the health and well-being of our people, our
37 future generations and all Alaskans and Canadians who
38 rely on the health of our salmon. After a decade long
39 incubation as a program of the Tanana Chiefs Conference
40 Yukon River and Tribal Fish Commission was born as a
41 stand-alone 501(c) organization in March of 2025. The
42 purpose of the Commission as stated in our constitution
43 is to act as a unified voice for the conservation and
44 restoration of all Yukon River fisheries, protect our
45 traditional ways of life and well-being, establish a
46 comprehensive management plan program based upon
47 distinct customary and traditional indigenous knowledge
48 and practices while striving for co-management to
49 ensure meaningful and substantive First Nation --

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1 tribal and First Nation participation in all aspects of
2 fisheries stewardship.

3

4

5 We have three main goals and priorities
6 that came directly through consensus from all of the
7 tribes who have signed onto our resolution. To
8 strengthen organization infrastructure and governments
9 building our institutional capacity, develop an
10 intertribal cooperative agreement with Federal and
11 State agencies to achieve co-management and to build
12 intertribal unity and collaboration to advance our
13 subsistence ways of life.

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So I'm really new especially to this Board. FSB, the RAC system and really in my role at the Yukon River and Tribal Fish Commission. I started working November 7th. On November 17th we had our first Board of Fisheries meeting so it's been kind of a nonstop barrage of regulatory meetings, executive council meetings and now annual meeting prep since the -- since the beginning. So it's been an amazing experience being here, learning our organization. I'm loving the opportunity to work for the tribes and thinking about our goals and the objectives and how we can continue to unify and think about some of our existing MOUs with BIA looking at the gravel to gravel initiative. And why I'm so excited to be here now and looking forward to participate as an individual and as Staff within our organization using the priorities of subsistence as rural preference as a framing as to like how we're going to continue to participate and think about collaborative management of our salmon resources in perpetuity.

So I really appreciate the discussions that were happening around the table here yesterday. I am really excited about the opportunities to meet the goals, the objectives and the opportunities of this Fish Commission to meaningfully engage and assert the tribes' perspective and rationale into every step of the way of governance.

So just to give a quick update about what's been going on in the last handful of months. We've really built up our infrastructure. Coming on board we had three Staff, by the end of this next month we'll have seven. So using that gravel to gravel as the framework we're building up our ability to take care of home, to build unity within the watershed. And

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1 this last February we worked really hard to build
2 consensus with a handful of other tribal organizations
3 that unify over a 150 tribes at the North Pacific
4 Fisheries Management Council and the Board of Fish, the
5 area M meeting. Through tribal consultation, through
6 intentional collaboration and communication and regular
7 get together to have meaningful discussion about how
8 we're going to come to consensus when we don't
9 necessarily always agree on an agenda item. And really
10 proud to be a part of those discussions and getting
11 that leadership and guidance from my boss, Charlie
12 Wright. A lot of the leadership within the interior
13 and up and down the Yukon and just listening to the
14 wants, the wills and the priorities of our tribes to
15 make sure that we are leading with love and building
16 consensus based off of our indigenous values.

17
18 And so we're -- we're building up our
19 infrastructure at home, we're advocating and so many of
20 the comments and the concerns that I heard about
21 trawling, about bycatch, about intercept, about
22 hatcheries, we're fighting really hard in those arenas
23 and hiring Staff to meaningful engage, provide the
24 communication directly to our tribes so that we're
25 building their capacities up to make meaningful
26 decisions and contributions to policy decisions here at
27 the Egan Center that impact their daily life.

28
29 I intentionally didn't give any real
30 regional reports and updates because we all already
31 heard it. The thoughts, the issues, the concerns from
32 our leadership up there on the Board and Charlie and
33 Jacque and Jack and Jack Keith. We've got the regional
34 reports, we know the concerns, they're the exact same
35 conversations that are happening over at the Captain
36 Cook right now at the YRDFA preseason meeting.

37
38 So I'll kind of end with the last hopes
39 and the goals and the intention of our organization,
40 why I'm so excited to bring a lot of this information
41 back here in the future is that we're building
42 consensus within the watershed on how we're going to
43 manage the returning or a rebuilding of the stock.
44 We've -- we heard quite a bit of information yesterday
45 about extirpation, the real serious concerns about not
46 having the ability to potlatch, to give a first name,
47 to give a first dance, to bury your dead, to honor. So
48 we -- we've heard a lot about the concerns about --
49 regarding a lack of salmon. One of the things that is
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1 consistently talked about over and over and over again
2 is we can't be fighting over the resource in times of
3 such stress.

4

5 So really looking forward to the next
6 12 months, 24 months, five years within our
7 organization to build that consensus and that unity,
8 our own collaborative management with U.S. Fish and
9 Wildlife and ADF&G, to assert the will, the
10 expectations, the analysis of our tribes to make
11 meaningful decisions on how -- what that conservation
12 looks like within the watershed with one voice. So
13 really forward to that, to spending time in Alakanuk,
14 in Beaver, in the communities that we represent growing
15 those understandings, building those relationships so
16 that when we come back here our voice, our
17 organizational stance and position is fully reflective
18 of the 44 and hopefully growing tribal organizations
19 that we represent.

20

21 So again I don't want to take up
22 anymore time, but just really grateful for the
23 opportunity to introduce ourself and recognize even
24 during a wildlife cycle how important, like how I --
25 how I view every chapter of the book that is us,
26 salmon's in there somewhere. So just really grateful
27 for this opportunity to see so many smiling and
28 familiar faces versus maybe at a Council meeting where
29 who knows where folks are coming from. And that --
30 when we get to an agenda item it's not a 30 page
31 presentation or we're not having to do an analysis over
32 thousands and thousands of pages of NEPA analysis. So
33 this has been really nice, I'm really loving and
34 enjoying my first FSB meeting and really looking
35 forward to engaging more.

36

37 So thank you. With that I'm -- I could
38 go on and on and on, but I'll.....

39

40 Thank you.

41

42 (Applause)

43

44 CHAIRMAN CHRISTIANSON: Thank you,
45 Craig. We appreciate that kind of morning testimony.
46 That kind of gives us a little -- little energy, right,
47 that we see you out there uniting and bringing that
48 voice forward and representing the family you come
49 from. So hats off to you and yeah, we'll -- I'm sure
50

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1 we'll be seeing an awful lot of you and we really as a
2 Board lean a lot on those relationships that are built
3 on the ground because that's where the trust is built
4 and then we do the best we can to receive that here and
5 act on, you know, when we have unified voice in
6 especially something like salmon that's such a critical
7 part of our culture and community. So appreciate you
8 guys' work and effort.

9

10 Thank you.

11

12 MR. REAKOFF: Mr. Chairman.

13

14 CHAIRMAN CHRISTIANSON: Yes.

15

16 MR. REAKOFF: May I make a comment?

17

18 CHAIRMAN CHRISTIANSON: The floor is
19 yours.

20

21 MR. REAKOFF: Western Interior Regional
22 Advisory Council's worked with Kuskokwim InterTribal
23 Fish Commission to a great extent, we're extremely
24 proud and happy to have the InterTribal Fish Commission
25 in the Kuskokwim working for the benefit of the
26 subsistence resource and the subsistence users. I'm
27 super excited to see the Yukon River InterTribal Fish
28 Commission being formed and look forward to working
29 with your organization.

30

31 Thank you.

32

33 CHAIRMAN CHRISTIANSON: Raymond.

34

35 MR. ONEY: Thank you, Mr. Chairman.
36 First of all I want to thank you real quick for taking
37 on the position. I know -- and thank TCC for running
38 this program for the Yukon. I know it's been on and
39 off for a number of times so I'm glad that you've
40 accepted the position and I'm very thankful that you're
41 here for this meeting for this organization to hear you
42 and to look forward to seeing you again in the future.
43 And also with the YKRAC, I chaired there for many years
44 so I'm hoping that they'll invite you over in --
45 probably in their fall or winter meeting. So I think
46 bringing unity to the tribes in our area is much needed
47 knowing that we have a disaster that's, you know, in
48 front of our eyes. So I thank you and setting those
49 goals and hoping that you guys will get off the ground
50

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1 and so I thank you for all the work that you're doing
2 and also for TCC for running the program.

3

4 Thank you.

5

6 CHAIRMAN CHRISTIANSON: Yeah. Thank
7 you for the kind words. Appreciate that. Next,
8 Robbin.

9

10 MS. LAVINE: Thank you, Mr. Chair.
11 Next person in the room is Brandy Standafer.

12

13 MS. STANDAFER: (In Native). My name
14 is Brandy, I come from the Native Village of Tyonek.
15 I'm sure a lot of you guys or the elders know where the
16 Tyonek is, but we are 49 air miles southwest of
17 Anchorage on the west side of Cook Inlet. We are the
18 only village on the west side of Cook Inlet.

19

20 I wanted to speak on three things. I
21 am a kid, I am too young to be speaking on these three
22 things. Please forgive me if I offend you, that is not
23 my intention.

24

25 We have the due processes that have
26 been put in place by legislative feat, different
27 parties. We have to do this a certain way, we have to
28 go through this door a certain way, we have to jump
29 through that hoop a certain way. Recently our Federal
30 subsistence has been targeted and we have been hit hard
31 by these protocols, by these committees, this advisory
32 board, State, local. I'm a third generation orphan
33 from the Kenai area. In the 1900s our chief said one
34 day the power's going to be in numbers. 1920 and the --
35 all the illness, things we were never exposed to
36 killed off a lot of our people. He sent around the
37 hunters to gather -- go check on all of our villages.
38 There is seven of them, but there is traditionally nine
39 relative villages of Tyonek. We are a migrating clan
40 where we travel with the season around the Cook Inlet.
41 He went and collected anybody that was still alive in
42 this area, come move to Tyonek. One day the power is
43 going to be in numbers. Since then and Tyonek was
44 established way before the statehood, some of our
45 government to government agreements were created right
46 around statehood. Our tribe was 20, 30,000 strong.
47 After the sickness that hit this area in 1920 that
48 number went way down. There is one original last name
49 of my tribe, all the rest of us were adopted, chose to
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1 live there, chose to learn that lifestyle. We are born
2 with that lifestyle. I would say at least 90 percent
3 of my food consumption comes from the land.
4 Historically, traditionally our only income is when
5 everybody started turning to the monetary value, we're
6 majority, almost 100 percent, commercial fishermen. We
7 came into that, why, because times change and this
8 world it takes money to make it keep on spinning.

9
10 Why I bring that up and I heard the
11 young gentleman before, the one on the telephone, our
12 most unregulated area, our hunting and fishing and I do
13 not ever like to mix subsistence with any to do
14 commercial. And as a self preference that's why I
15 don't sell beads, I don't sell hides, I don't sell furs
16 because that itself is a monetary value that all of
17 your pocketbooks together is not enough. They say
18 they're running out of fish or elders are not getting
19 the food that they used to 30 years ago. Community
20 saying oh, they don't see a certain fish or like I said
21 we're the only village on the west side of Cook Inlet.
22 Our little, tiny rivers could fit right here between me
23 and you has been shut down for kings for over 30 years.
24 We don't mind that because it's saving what we have
25 left. We all have to remember that story that was
26 gifted to us from our grandparents and they were gifted
27 it from their grandparents, we, the people that walk on
28 the land, we manage it, we've done it for millenniums.
29 So I'm -- I don't care that our little, tiny river is
30 shut down for the last 30 years for kings, why, because
31 maybe in 30 more years there will still be kings thanks
32 to our one little river.

33
34 And I bring this up because State of
35 Alaska doesn't really -- the Department of Fish and
36 Game and the State of Alaska in my very young time has
37 been reckless when it comes to the regulation of these
38 commercial industries, sports fishing, commercial
39 fishing. I've always been the oh, like how could they
40 issue so many license to not only, you know, residents,
41 but non-residents. It's appalling and it's -- I'm kind
42 of embarrassed by my own state. You see it on the news
43 we're hurting, we're hurting and lack of fish,
44 emergency closure and when we have our own leadership
45 not taking in consideration how many does 500 -- my
46 uncle did some numbers, math, and I could have never
47 thought of that, but to issue over 500,000 licenses.
48 Oh, but they're worried, they're going to shut us down,
49 the people that live here 365 days, for this very -- I
50

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1 wouldn't say inconsiderate industry of commercializing
2 our food. I have no idea of who this Board, Federal
3 Subsistence Board consist of and I pray you all live
4 here in Alaska 365 days a year.

5

6 That was my -- that's Topic Number 1.
7 To close that part out, why isn't this Kenai River and
8 Ship Creek and all the other creeks -- that's scary --
9 I'm grateful I don't have to stand elbow to elbow with
10 my neighbor or just another citizen of United States of
11 America to get my food for that day. And don't get me
12 wrong, I know about the sports fishing and commercial
13 fishing. I was born on this Cook Inlet and the water
14 took my pinkie when I was nine so I know that life.
15 The State of Alaska, they want to shut down our little,
16 tiny river, but leave these rivers open. On the east
17 side they got the Cook Inlet taking god knows the
18 amount of fish out of that water every day for the
19 whole -- well, Alaska we barely get three months, 12,
20 15 weeks of summer. We don't even like to go visit
21 family that's on the road system on the peninsula
22 because it's clogged with traffic. That's
23 heartbreaking. Not last year, the year before, they
24 did shut down the Ship Creek for like the middle to the
25 end of the king season, why not 20 years ago when
26 people, tribal members, Alaskan residents raised this
27 concern 20, 30 years ago.

28

29 So our next -- my next one is we -- we
30 have to go through different entities, different
31 committees, different commissions, there's the Alaska
32 Fish and Game, to get paperwork in you guys' big book.
33 Where I come from we have a government to government
34 agreement when it comes to our Federal subsistence
35 rights which I stated at the beginning that was
36 created, signed by the Federal government in early
37 statehood. Since then our -- the State of Alaska
38 violated that. And we -- I -- we're raised you're not
39 supposed to talk to elders like that or you do
40 something, you say something and that's it. Without
41 prior authorization and consultation they have taken
42 not only one day of our week so now they bring --
43 they're taking away two days of our subsistence days.

44

45 Our village is big. We have maybe less
46 than 1,500 of us, but my daughter's grown, she's
47 blessed me with a grandchild, you know, great
48 grandchildren. To have multiple households, multiple
49 families living in a household and the State of Alaska,
50

1 Board of Fish and Game tell us we have one day a week,
2 the season. They would not consider the day, they
3 would not consider our tide. Our tide if you don't
4 know in the Cook Inlet it's six hours in, six hours
5 out. I'm sure that's everywhere the coast touches
6 Alaska. The only difference is some beaches are
7 slightly slanted, some beaches are very steep, but
8 we're grateful we get six hours going out and six hours
9 coming in. Mind you the current in the Cook Inlet is
10 one of the strongest in the world. We can only fish
11 coming in tide. Some of the State of Alaska,
12 Department of Fish and Game, Board of Advisors, never
13 consider. Then we said okay, then why don't we do that
14 one day a week, have it a 24 hour -- have it for 24
15 hours that one day a week. To me that's reckless
16 because I don't -- I don't know, I mean, I can't
17 guarantee I'm going to fill up my smokehouse in two,
18 three weeks out of our 12 week summer season, our 12
19 week where we have to fish, hunt, gather our plants,
20 our material, our berries, our -- there's got to be 10
21 of me if I'm going to do that in 12 weeks, one day a
22 week. That was my topic number 2.

23

24 My third one aligns with the last one.
25 Our elders are founders of the State of Alaska with
26 partnership with all of our tribes who used to all sit
27 at this table and many other tables like this created
28 our laws, regulations, they had a whole line of
29 lawyers, record personnel and I seen you guys' book on
30 how oh, we want to change and do this and rewrite this
31 or I -- if they weren't real, 100 percent it would
32 never have made it into that final draft. And you guys
33 in leadership position or on this fancy Federal Board,
34 please consider the laws as they were written. I was
35 raised where you make a decision you're going to live
36 with that decision. Oh, there's no oh, 20 years down
37 the road of we're going to change it to look like this
38 or to fit this narrative or the -- no. To me and how I
39 was raised that is a weak -- you look weak if you want
40 to take something so powerful and so sacred to our
41 people and to rewrite it. That's like -- that's like
42 spitting on something our people once held dear to
43 their heart.

44

45 Thank you very much. I appreciate
46 every single one of you. I pray for every single one
47 of you. And please forgive me if I offended anyone of
48 you or any member in this room.

49

50

0165

1 Thank you.

2

3 CHAIRMAN CHRISTIANSON: Thank you,
4 Brandy. Any comments from the Board.

5

6 (No comments)

7

8 CHAIRMAN CHRISTIANSON: Appreciate your
9 testimony this morning.

10

11 MS. STANDAFER: Thank you, sir.

12

13 CHAIRMAN CHRISTIANSON: Thank you.

14

15 MS. STANDAFER: You're brave for being
16 the Chair.

17

18 CHAIRMAN CHRISTIANSON: I appreciate
19 that, yeah. It takes patience. Thank you for your
20 testimony. I'll also be brave enough to remind people
21 we have a long agenda and as we stated that we would
22 like to be mindful of maybe around eight to 10 minutes
23 if we're passionate, shorter and brevity and pointed if
24 you're here to move something up the chain. So we
25 would appreciate that.

26

27 Thank you.

28

29 MS. LAVINE: Next in the queue is
30 Sterling Spilinek.

31

32 Sterling, please come and address the
33 Board.

34

35 MR. SPILINEK: Hello, everybody. My
36 name's Sterling Spilinek, I am the Wildlife Biologist
37 for Ahtna InterTribal Resource Commission. I just had
38 two topics I wanted to touch on. One, I wanted
39 everyone on the Board to consider in your decisions
40 through this meeting the NPS proposed rule that's
41 coming through, make sure that whatever decisions you
42 make that you keep that in mind. In the six years that
43 I've been doing this work up in Alaska and looking at
44 almost every single Federal Register that affects our
45 area, this NPS proposed rule is by far the most
46 convoluted, most confusing and most vague public record
47 that I've been a part of. I've reached out
48 collaborators, I've reached out to regulatory
49 specialist, I've reached out to organizations that
50

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1 special -- specialize in policy and there seems to be
2 no clear consensus on what it does and what the impacts
3 might be. Even asking some of our Federal partners
4 what to get some insight into it, it just makes the
5 water more muddy.

6
7 So the second thing I wanted to mention
8 is I did get reached out to by quite few Federal
9 partners and agencies about the collaborative hare
10 snare project that AITRC, ADF&G and UAF conducted from
11 2020 to 2022. We do have a density estimate for bears
12 within GMU 13. I am unable to share any of that
13 information with this Board at this time based on our
14 data sharing agreement we need to have consensus
15 between all the collaborators and we have not heard
16 back from the Alaska Department of Fish and Game. So I
17 apologize for that, but as soon as we get that
18 information we will be sharing it with the management
19 agencies.

20
21 And that's all that I had for you guys
22 today. Do you have any questions?

23
24 Thank you.

25
26 CHAIRMAN CHRISTIANSON: Thank you.
27 Appreciate it. Any questions from the Board, comments.

28
29 (No comments)

30
31 CHAIRMAN CHRISTIANSON: Thank you for
32 taking the time this morning to share that.

33
34 MS. LAVINE: Mr. Chair, next in the
35 queue is Tom Harris. Tom Harris, are you in the room?

36
37 (No comments)

38
39 MS. LAVINE: Mr. Chair, next in the
40 room is Mr. Rick Delkitty.

41
42 MR. DELKITTY: Hello, my name is Rick
43 Delkitty, I'm from Nondalton. I'm well over 10,000
44 generation Athabaskan. I fought Pebble for over 20
45 years and those presentations that I did during that
46 time is exactly what we're talking about today,
47 cultural, customary and traditional values and it goes
48 back a long way. We have birthdays, anniversaries,
49 holidays and these times I have to hunt. And we share.
50

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1 In my younger days I would hunt for my aunts, my uncle,
2 my grandma, my grandpa, mom and dad. If my dad was
3 here today and at this forum he would go home and he
4 would write letters to the Alaska Congressional
5 Delegation with concerns and maybe some ideas.

6
7 The sports fishing industry, the Alaska
8 Department of Fish and Game, they sell quite a few
9 sport fishing licenses. The resources that they are
10 after cannot sustain that kind of numbers. If you look
11 at the historic resources of Alaska whether it's in the
12 water or walking around on the land it's been
13 diminished, some of them collapsed. You guys are
14 charged with making determination on these resources.
15 That determination made today needs to have definition
16 of sustainability for tomorrow. And to have success
17 with that for tomorrow you have to understand the
18 history. And in the '50s and the '60s they called it
19 the abundant land, the land of plenty. It's no longer
20 like that. I witnessed a lot of changes in my time.
21 I'm not far -- very far away from being 70 and I
22 witnessed changes as I -- traveling through time. And
23 these changes are alarming. Some of them are
24 escalating at a very fast rate. Where I'm from I can
25 no longer hunt for caribou. Now them hunters are going
26 to the Brooks Range to hunt caribou. Do you guys know
27 how many caribous we killed in 2020, 211,000. Now
28 let's take a close look at that number, that's what
29 ADF&G's reporting. These resources have natural
30 adversaries.

31
32 (Indiscernible - teleconference
33 interference).

34
35 CHAIRMAN CHRISTIANSON: Could you
36 please mute the line, please.

37
38 Sorry about that, we keep getting a
39 leak in the audio here. Now you have the floor.

40
41 MR. DELKITTY: Okay. These caribou
42 they have natural adversaries that they rely on them.
43 They also during mating they are fighting each other,
44 the bulls. Sometimes one bull would kill the other
45 bull or they would lock the horn and they can't come
46 apart so they don't make it. That's another number
47 adding to -- oh, no, it was 21,000 caribou harvested in
48 2020. So you add that number to that. Then you add
49 another number where the calves don't make it, that'
50

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1 another number. And then you add another to that, a
2 good portion of them are going to die from natural
3 causes. Then that's also one more, climate change.
4 And I'm a witness to that. In 2014 in Nondalton,
5 December it rained most of the night. Before daylight
6 the weather changed to below zero, it was a cold snap.
7 It killed a lot of fur bearing animals. This is a
8 regular trend now. We see rain in December and we see
9 rain in January. That never used to be when I was in
10 elementary school. So these changes have to be
11 recognized by you guys that are making determinations
12 on these resources.

13

14 The moose in 2020, there was 7,000 of
15 them harvested and it parallels the caribou. They have
16 natural adversaries, they butt heads, some of the
17 calves don't make it and climate change have an adverse
18 impact. Everything, all fur bearing animals and even
19 in the water.

20

21 Now let's take a look at sport fishing
22 industry. The State of Alaska, they're going to sell
23 all the licenses that they can. Oh, and getting back
24 to the hunting there's also a permit hunting that
25 individuals can apply for. So that's another number to
26 add to that.

27

28 The fishing, there's approximately 350
29 lodges in the state of Alaska. And let's stick a
30 number on that, clients. A lodge can -- they take --
31 this is a very conservative number, eight clients per
32 weeks. Now there's four weeks in a month. They have
33 four months of fishing. So do the math. These
34 resources can't sustain these kind of numbers. I
35 witness -- I'm a witness to rivers where there's no
36 longer fish and there's more coming online that's going
37 to be the same way. You guys are in charge, we look to
38 you guys for leadership.

39

40 The Alaska Department of Fish and Game
41 in my view they don't understand us because I see where
42 resources, renewable resources that collapsed, Kodiak
43 king crab, Bering Sea crab, Mulchatna Caribou Herd and
44 it's got their names written all over it. My wish is
45 that you guys work with them and when they have a
46 meeting you guys are there. And I know that's not
47 going to happen. In 1959 they didn't allow the
48 indigenous community to vote. Here in just recent
49 times the State of Alaska finally recognized tribal
50

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1 institution. There's something wrong with this
2 picture. The Sierra Club and the Sport Fishing
3 Association have a lobbyist that go to Juneau and lobby
4 the Legislature and tell them what they want. That
5 discriminates against me. It's really sad to see that
6 the leaders of this country don't recognize us. And
7 the only time seems like that they recognize us is when
8 it's time to vote. You guys have responsibility to the
9 indigenous community in the state and these resources
10 are on their way to diminish, some of them collapsed.
11 We look to you guys for guidance and help. We have
12 thousands of years of customary and traditional use
13 knowledge. We are at arms length from these resources
14 and we understand them.

15
16 (Indiscernible - teleconference
17 interference).

18
19 CHAIRMAN CHRISTIANSON: Could you mute
20 that line, please.

21
22 MR. DELKITTY: So I thank you guys for
23 your service, your dedication. I come here with a
24 heavy heart.

25
26 Thank you.

27
28 CHAIRMAN CHRISTIANSON: I truly
29 appreciate your testimony this morning and bringing
30 that perspective to the room. You know, we all need to
31 be reminded of why we're here and the history of it
32 because it bears a lot of weight on how we do make
33 those decisions. So I appreciate that this morning and
34 definitely apologize for the technical difficulties we
35 keep having that are causing slight disruptions.

36
37 So thank you for your time this
38 morning. Is there anybody from the Board who would
39 like to make comment, statement.

40
41 (No comments)

42
43 CHAIRMAN CHRISTIANSON: All right.
44 Thank you. We appreciate your time.

45
46 MS. LAVINE: Thank you, Mr. Chair.
47 Before we get into the next presentation we have the
48 southeast students here to introduce themselves to the
49 Board.

50

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1 I would like to make a request for all
2 of you listening online, occasionally throughout this
3 morning's testimony we have been interrupted quite
4 loudly by different processes going on. I want to make
5 sure that you all know how to mute your phone line. So
6 please check that your phones are muted and you can do
7 so by pressing star, six on your phone. If you are on
8 Teams also make sure that your microphone is muted.

9
10 Thank you. Mr. Chair, I'd like to
11 request Heather Bauscher approach the table.

12
13 Thank you.

14
15 MS. BAUSCHER: Good morning. Thank
16 you, Mr. Chair, members of the Board. I'm delighted to
17 be here with another group of students through the
18 University of Alaska Southeast, Policy and Procedures
19 class about navigating the Federal Subsistence Board
20 process. My name is Heather Bauscher, I'm the rural
21 resident of Petersburg, Alaska. I'm the Fisheries
22 Community Engagement Specialist for the Sitka
23 Conservation Society working with communities across
24 southeast Alaska and an adjunct professor at the
25 University of Alaska Southeast teaching these policy
26 classes.

27
28 I'm here today with another group of
29 students. I'm very excited and grateful to be able to
30 bring them to this meeting once again. Special thanks
31 for Forest Service for the continued support and
32 funding, Ashley Bulworth has been helping to instruct
33 these classes. This continues to be supported by folks
34 in the Tongass Subsistence Program. Thank you, Rob
35 Cross and Greg Rishdahl. A number of you in this room
36 have also called in to the class to help support the
37 students so I want to say thank you to Mr. Chairman,
38 Tony Christianson, Rhonda in the past, Jerry spent some
39 time with them yesterday over lunch and Frank Woods too
40 so thank you so much. Your interactions with them
41 really help make this experience a positive first
42 experience in this space. And a note on some of the
43 aspects of this class, it's an experiential learning
44 course so all of the assignments are about building the
45 skills needed to be effective in these spaces. So some
46 of their assignments include giving testimony and they
47 will be coming up next after me and we've been
48 preparing this for the last two weeks and they're very
49 excited to share. They also have to collect contact
50

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1 lists for networking purposes and they're required to
2 do a couple interviews. So please interact them
3 throughout the meeting so they can accomplish those
4 assignments. And their final paper is about picking an
5 issue of their choice. So they're also supposed to
6 talk to everybody on all the different sides of the
7 issue. So please be willing to talk to them and share
8 your perspectives on the different proposals.

9
10 So without further ado I'm going to
11 turn it over to the students.

12
13 MS. LAVINE: Next on our list is
14 Dettrich Lewis. Dettrich.

15
16 MR. LEWIS: Thank you, Mr. Chair and
17 the members of the Board. First I would like to thank
18 all of you for giving me this opportunity as well as
19 UAS. My name is Dettrich Lewis, of course, I am here
20 from Hoonah and I'll be representing myself.

21
22 While I do not hunt personally my
23 family has consumed deer and other subsistence use --
24 subsistence resources my whole life as a vital part of
25 our diet. These resources are a vital part of our
26 traditions and our cultural practices and they matter
27 because they show that people are capable of living off
28 the land in a way that is respectful and sustainable as
29 they have done since time immemorial.

30
31 I'm concerned about the winter kill
32 from this particularly harsh season that all of us
33 across southeast and the rest of the state have
34 experienced. We do not know -- we do not yet know the
35 full extent of the damage, but anecdotal evidence from
36 hunters shows that possible die-offs and poor health
37 for the survivors have happened. I urge the Board to
38 be open to limiting the deer hunt for out of region
39 hunters and non-Federally-qualified subsistence users.
40 The people of rural areas rely on these resources to
41 feed their families and we cannot be competing with
42 non-rural hunters if the numbers drop. If these
43 resources decline it would be devastating for the
44 people of my community and the rest of southeast.

45
46 Thank you for hearing my testimony.

47
48 CHAIRMAN CHRISTIANSON: Thank you.
49 Appreciate your time coming in, appreciate you guys
50

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1 stepping up and, you know, engaging in the Board
2 process. So keep it up, partner.

3

4 MS. LAVINE: Next we have Lucas Sterns.

5

6 MR. STERNS: Good morning, Mr. Chair
7 and members of the Board. My name is Lucas Sterns, I'm
8 a sophomore at Wrangell High School and I have lived in
9 southeast Alaska my entire life. Today I'll be
10 representing myself as a subsistence fisherman, hunter
11 and constant user of salmon. I enjoy trolling,
12 gillnetting, alpine hunting for Sitka black tail deer
13 and moose hunting on the Stikine River. A change that
14 I see in trolling for salmon is that it continues to
15 get harder and harder to go out and get salmon because
16 areas around my community continue to be shut down to
17 the resource. Communities on the inside passage are
18 restricted due to stocks of concern and to allow the
19 trans-boundary fish to make it to the spawning grounds
20 where mines are being built at the headwaters.

21

22 I feel that these resources are very
23 important to preserve because I don't want to live in
24 an Alaska where my kids and my kids' kids do not have
25 access to them.

26

27 I'm also going to be talking about the
28 designated hunter program in our region. This program
29 is very important because it ensures that elders and
30 people with disabilities and those who cannot hunt for
31 themselves can continue to have access to traditional
32 foods. Southeast relies heavily on this system and I
33 believe it should remain in place. However there are
34 increasing concerns that this program could allow
35 hunters using these permits to expand their subsistence
36 harvest opportunities beyond what is intended.

37

38 In our area a person can go up the
39 Stikine, shoot an illegal moose, return to town, obtain
40 a designated hunter tag or return to the river to shoot
41 yet another moose. Occasionally illegal animals can be
42 harvested without consequences tied specifically to
43 designated hunter privileges. This could begin to
44 create a strain on moose populations if enough illegal
45 moose are killed. One possibly solution to this
46 problem could be to adopt a tiered accountability
47 system where minor violations result in warning and
48 more serious violations such as shooting an illegal
49 moose could lead to a one year or more suspension of
50

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1 designated hunting privileges. Another possible
2 solution would be to limit the number of people a
3 designated hunter can serve each year with room for
4 tribal or community exceptions when needed. These
5 changes would enhance the program's effectiveness by
6 reducing misuse and protecting wildlife while
7 maintaining access for people who rely strongly on this
8 resource.

9

10 Thank you, Heather Bauscher and Kim
11 Harmindarious, for helping me to bring this opportunity
12 to my town and giving me the ability to attend this
13 meeting.

14

15 Thank you, Mr. Chair and Board for your
16 time and consideration as well as the opportunity to
17 speak to you all.

18

19 CHAIRMAN CHRISTIANSON: Thank you.
20 Appreciate your presentation this morning and good luck
21 with your class. Any questions from the Board,
22 comments.

23

24 (No comments)

25

26 CHAIRMAN CHRISTIANSON: And good luck
27 with your sports seasons too. If you get out and know
28 the kids you get to find out what they do in the
29 background. So.....

30

31 MR. STERNS: Thank you.

32

33 CHAIRMAN CHRISTIANSON:that's
34 good, we got a lot in common when you're an Alaskan.

35

36 MS. LAVINE: Next we have Ki Wick.

37

38 MR. WICK: Hello, Mr. Chairman and
39 members of the Board. I will be representing myself as
40 a subsistence user. My name is Ki Wick and I've lived
41 in southeast Alaska my entire life. I am from
42 Wrangell, Alaska. I enjoy hunting, fishing and
43 trapping. I also really enjoy fishing commercially and
44 sport fishing with my friends and family. I really
45 enjoy fly fishing in freshwater for steelhead and
46 trout. I didn't really get into hunting until I was
47 about 10 years old. I really enjoy hunting deer and
48 grouse and spending time in nature with my family and
49 friends.

50

1 Today I will like to speak about the
2 designator hunter program and hunting by proxy for
3 other people. One of my main concerns is that the
4 current system allows individuals to obtain multiple
5 tags sometimes by printing or purchasing them from
6 people who do not hunt. This creates a situation where
7 a single person could harvest an excessive amount of
8 deer which may negatively impact the local deer
9 population in the fear -- in the near future and for
10 future generations. I believe there should be stricter
11 regulations in place including limits on the number of
12 tags an individual can use. There should also be
13 consideration of an age restriction or other
14 qualifications to ensure responsible participation in
15 the program. Additionally there are open -- ongoing
16 concerns about illegal hunting practices such as road
17 hunting, spotlighting and poaching. These activities
18 by bad actors not only violate regulations, but also
19 contribute to an unsustainable harvesting that impacts
20 responsible users of the resources.

21
22 I respectfully ask the Board to review
23 these issues and consider implementing changes that
24 will change and help protect the deer population and
25 promote fair, ethical hunting practices.

26
27 Thank you for your time and
28 consideration.

29
30 CHAIRMAN CHRISTIANSON: Thank you for
31 that presentation. And I like the way we have some
32 solutions built in. So any questions from the Board or
33 comments.

34
35 (No comments)

36
37 CHAIRMAN CHRISTIANSON: All right.
38 Thank you, Ki.

39
40 MS. LAVINE: Next on our list is James
41 Erickson.

42
43 MR. ERICKSON: Mr. Chair and members of
44 the Board. My name is James Erickson, I'm from Hoonah,
45 Alaska and I've lived there my entire life. I'm
46 representing myself as a lifelong subsistence user and
47 I'm a hunter and fisherman and I come from a commercial
48 fishing family where I grew up fishing for kings and
49 cohos on my grandpa's troller.

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1 I am concerned about the impacts that
2 large scale industrial trawlers have on the population
3 of salmon in particular. Many people in the community
4 rely on fishing for income and due to conservation
5 concerns in the spring if people from Hoonah want to
6 catch king salmon they have to travel well over 40
7 miles instead of going to more accessible areas which
8 will become even more difficult with the fuel prices
9 going up. I feel that this has had a pretty harsh
10 impact on the local trolling community and people that
11 fish king salmon for subsistence because our region
12 hasn't had a spring king opener in years.

13
14 I would like to see these concerns
15 addressed by greater collaboration with the North
16 Pacific Fisheries Management Council and support for
17 changes in the amount of bycatch per season or per
18 trip. I also think that a change in the size of the
19 net or other modifications would also be a reasonable
20 change that could limit the impact that trawlers have
21 on fish populations.

22
23 I'd like to thank you for your time and
24 consideration and the opportunity to speak before you
25 here today.

26
27 CHAIRMAN CHRISTIANSON: Thank you.
28 Appreciate that presentation.

29
30 MS. LAVINE: Thank you, Mr. Chair.
31 Next in the queue is Jora Sovlind.

32
33 MS. SOVLIND: Good morning, everyone,
34 Mr. Chair and members of the Board. My name is Jora
35 Sovlind, I'm from Hoonah, Alaska and I've lived in the
36 southeast my whole life. I'm speaking on behalf of the
37 subsistence user. I grew up spending time out on the
38 boat hunting and fishing with my family, mostly my dad.
39 And it's always been a big part of my life. It's very
40 important to me and I want my kids to have the same
41 experiences. Some of the best memories didn't just
42 come from catching a deer, but spending time with the
43 people who I enjoyed that with. Being outdoors is one
44 of the main things to do in southeast and I love it.
45 It's easy to take that for granted. This is why I want
46 to share my concerns about the impacts of the past
47 winter on the deer population in the northwest
48 Chichagof area.

49
50

0176

1 Over the last couple winters -- over
2 the last couple years winters have been hard all over
3 southeast compared to earlier years. And this season
4 in particular brought cold temperatures and a lot of
5 snowfall that made it hard for deer to access food and
6 find enough to eat. As of March, 2026 we also broke
7 our all time seasonal snowfall record with close to 201
8 inches recorded. Because of these conditions many deer
9 were lost. From what I've seen and heard from others
10 in the community there are noticeably fewer deer in
11 that area and the ones I have seen have looked skinny
12 and had less fat. I'm concerned that the harsh winter
13 will impact the population in the seasons upcoming.

14
15 I ask that the Board take this into
16 consideration when reviewing future proposals
17 concerning deer bag limits and access to issues in the
18 northeast Chichagof area. Given these conditions I
19 believe that four deer per person is more than enough.
20 In a two person household a limit of 12 deer is
21 excessive. We've harvested three deer in multiple
22 winters and had enough to feed ourselves in the season --
23 throughout the season while still harvesting and
24 giving others to family members. Based on that
25 experience I would support reducing the harvest limit
26 from six to four deer.

27
28 Thank you for your time and
29 consideration.

30
31 CHAIRMAN CHRISTIANSON: Thank you.
32 Appreciate your testimony this morning. Any questions
33 or comments.

34
35 (No comments)

36
37 CHAIRMAN CHRISTIANSON: Well done.
38 Thank you.

39
40 MS. LAVINE: Next we have Julian
41 Narvaez.

42
43 MR. NARVAEZ: Thank you, Chairman,
44 members of the Board. My name is Julian Narvaez. I'm
45 a resident of Hoonah and I work for the Hoonah Indian
46 Association and this is my third time bringing students
47 to these meetings. I want to say thank you to Heather
48 Bauscher and her team and I want to give everyone on
49 the Board and everyone else here thanks for evaluating
50

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1 our youths' voices. I think our students have impacts
2 into listening skills during these meetings and it
3 helps volumes as you know when it comes time for them
4 to speak they are held in high regard.

5

6 So thanks again. This experience stays
7 with them and hopefully means that they keep engaging
8 with the process throughout their lives and, you know,
9 involves their families, it involves people they know,
10 hopefully there's people adding to our -- I think
11 there's people in Hoonah right now that are listening
12 in so thanks to them and this whole process, you know,
13 we've been able to widen the engagement.

14

15 So thanks, everyone.

16

17 CHAIRMAN CHRISTIANSON: Thank you,
18 Julian. Questions, comments.

19

20 (No comments)

21

22 MS. LAVINE: Next we have Keenan
23 Sanderson.

24

25 MR. SANDERSON: Good morning, Mr.
26 Chairman, Federal Subsistence Board. For the record my
27 name is Keenan Sanderson. I come by way of Ketchikan,
28 I was born and raised there, but I have a lot of family
29 in Prince of Wales, particularly in Hydaburg and Craig.
30 And I wanted to talk to you about two different things.
31 First and foremost I'd like to thank Heather Bauscher
32 for her support of the students that were able to speak
33 to you this morning. She's put together an incredible
34 program and this is my first time being able to support
35 her and here students through the Federal Subsistence
36 Board process and I can tell you it -- what they have
37 been able to put together is incredible. And I just
38 hope that, you know, we're able to continue to do that
39 in the future both for our Southeast RAC and the
40 Federal Subsistence Board, but also in hopes that this
41 opportunity may be extended to other regions around the
42 state as -- from one year of being able to be directly
43 involved in this process it has been really awesome to
44 see what these kids have put together within their
45 testimony and their assignments to get ready for this
46 meeting. So I just want to really commend the people
47 who put that program together.

48

49 One other thing that I would like to

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1 really discuss while I have the floor is -- isn't --
2 isn't something that necessarily is the-- under the
3 direct purview of the Federal Subsistence Board, but is
4 within the world of some of the entities that are
5 affiliated -- not affiliated, but that are involved
6 with the Federal Subsistence Board process including
7 the Department of Fish and Game and Federal agencies
8 and that is the oncoming invasive European green crab
9 problem that's happening in southeast Alaska. I first
10 learned about this problem about three or four years
11 ago and really learned a lot of it with my own use
12 program that I run back home in Ketchikan when they
13 wrote up about a 15 page resource project on potential
14 impacts from invasive European green crab on
15 traditional foods in southeast Alaska. And let me tell
16 you it is a bit horrifying to see what has happened in
17 other regions around the world and how quickly it has
18 happened and how much it has impacted the local food
19 sources in other areas. I don't have the most up to
20 date numbers, but I do have a couple of numbers I would
21 like to share with you. In Haida Gwaii they -- they
22 first observed their first European green crab in 2020
23 and between that time they were able to develop a
24 pretty strong removal program down there and as of
25 October of 2024 they have removed over 1 million green
26 crab from their waters. One million and that -- that
27 is just what they removed, but that was within a four
28 year time frame. It is very scary how quickly their
29 population can explode. They were then first observed
30 in Alaskan waters in 2022 within the Metlakata Indian
31 community. And I don't remember the exact number, but
32 within their first two years of their program they've
33 caught tens of thousands of crabs within their small --
34 relatively small jurisdiction. Also very horrifying
35 because Metlakata Indian community is very close to
36 where I live in Ketchikan and were I have family over
37 in Prince of Wales.

38
39 And the reason why I bring this up
40 because I do feel like entities like the Alaska
41 Department of Fish and Game and the Fish and Wildlife
42 Service and to a lesser extent some of the other
43 Federal agencies, this is -- this is an issue that more
44 people need to be paying attention with and putting
45 effort and resources into mitigating the issue.
46 Invasive European green crab are problematic for a
47 number of reasons. They eat just about everything,
48 clams, other crab, and a ton of other things that
49 Alaska Native people found need to sustain their way of
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1 life.

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4 And in particular one region of
5 southeast that I think is going to be
6 disproportionately impacted by this invasion compared
7 to other places it is pretty much anyplace that also
8 has sea otters. There are large populations of sea
9 otters because in those places where and I often use my
10 home community of Hydaburg as an example, a lot of
11 people there really rely on indigenous crab for their --
12 to practice their way of life and they've been
13 hammered really hard by the nuisance species that is
14 sea otters. It's -- hasn't been -- that problem alone
15 hasn't been dealt with in an effective way to help
16 benefit traditional food resources, but if you add in
17 invasive European green crab it is going to completely
18 annihilate dungeness crab populations. And I know
19 there are several entities that are working on it. I'm
20 very thankful for the Metlakata Indian Community for
21 doing a lot of good work in their region. The
22 Ketchikan Indian Community's also starting to develop a
23 program of which I'm very thankful for and then
24 entities like Alaska Sea Grant and some places down
25 south are doing a lot of good work as well, but it is
26 my hope through whatever funding avenue, whether it be
27 Federal appropriations, more effort through the State
28 budget or if we're lucky to get several large grants
29 that every community has the infrastructure and people
30 to help deal with this problem with -- in every single
31 community across Alaska because unfortunately it's --
32 there's not really much we can do to stop it, but we
33 need to work on mitigating this issue before it gets
34 out of hand.

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There's a lot more that I can say on
that, but I just wanted to use this opportunity because
I know there are several people who represent State and
Federal agencies here that can and do have the power to
help these communities with this problem.

And with that that is all I have, Mr.
Chair. Thank you for your time.

CHAIRMAN CHRISTIANSON: Thank you,
Keenan. Yes, Frank.

MR. WOODS: Comment. Thank you for the
youth and your testimony. Under the Marine Mammal
Protection Act I think would be a good venue to

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1 challenge you and your youth group to look at co-
2 managing, addressing the Marine Mammal Protection Act,
3 co-management agreement between the tribes, Federal
4 government and the State of Alaska. I see a solution
5 as part of it and being it forwarded is important. And
6 great testimony and leadership in the last couple days
7 to your youth. Thank you, Heather, again and southeast
8 group there.

9

10 Thank you.

11

12 (Applause)

13

14 MR. SANDERSON: And just for the
15 record, Mr. Chair, I did -- forgot to put this at the
16 start of my testimony. I'm representing myself and no
17 other entity.

18

19 MS. BAUSCHER: I failed to mention a
20 few things earlier. My name is Heather Bauscher again
21 for the record. I also wanted to thank the adults
22 helping to support the students and mention the hybrid
23 model we're working with now. Hoonah was the first
24 remote cohort and they've been participating for three
25 years now. I -- so big thank you to Julian Narvaez and
26 Jackson Cones. There's other adult participants with
27 support from Tlingit and Haida and the Alaska Youth
28 Stewards Program. We now have participants from Prince
29 of Wales, Angoon. Two of those folks will probably
30 speak tomorrow. One is listening online because they
31 weren't able to attend in person, but we're really
32 trying to build these cohorts in these other
33 communities and this all started in Sitka about 10
34 years ago, but now we have Sitka, Hoonah, Wrangle,
35 Petersburg and the hopes of bringing on through these
36 adults that are now participating folks in Prince of
37 Wales and Angoon in the future.

38

39 I also wanted to say thank you to the
40 Southeast RAC. I failed to mention that earlier. Don
41 has been a supporter for years and often calls in and
42 talks to the students. And it's really only been
43 because of the support of the members of the Regional
44 Council in Southeast that this program has grown the
45 way it has. And I appreciate their continued support
46 and adding it in the annual report every year because
47 that's what allowed this to continue and to expand. So
48 also thank you to the Seward Peninsula RAC. They
49 recently requested a presentation. Thank you, Louis.

50

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1 So we're looking at ways that we can
2 expand this and I also wanted to add thanks to
3 everybody that showed up at the reception last night
4 and interacted with the students, it's really
5 meaningful as you can see. And I mentioned last night
6 that there is a teaching guide and I will have physical
7 copies of this teaching guide in the back of the room
8 this afternoon. So come talk to me if you want one of
9 those, I want to keep everybody's contact so we can
10 track where they're going, but that is really a
11 combination of all of the work over the last decade and
12 all the contributions of everybody in this room. You
13 all have contributed to this program whether you
14 realize it or not. So that's what's been attempted to
15 capture in this guide and it's really more of an
16 offering that is meant to be built upon so I hope
17 others can use it and we're looking forward to finding
18 ways to collaborate to support folks across the state
19 being more engaged in helping to bring their youth into
20 these spaces.

21
22 So thank you very much.

23
24 CHAIRMAN CHRISTIANSON: Thank you,
25 Heather. And we truly do appreciate that.

26
27 (Applause)

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29 CHAIRMAN CHRISTIANSON: Yeah, we truly
30 appreciate the students and their engagement and
31 continued involvement and the testimony they placed
32 here was things that were close to their heart and the
33 way of life that they live. And so it's good to see
34 that they mix that both with, you know, where they come
35 from and the management side of it, you know, getting
36 the bells and whistles in the book. And we use this
37 training and a traditional guardian program as well and
38 some of the stuff like we're getting pictures right now
39 of real time green crab training going on in that and
40 buckets full of green crab training going on Met and
41 buckets full of green crab they're picking up as we
42 speak, right. And so there's other spaces that they've
43 been educating and doing outreach in and actually
44 handing, you know, front line workers which are tribal
45 employees those tools so that they can apply and start
46 to address resource management issues in real time
47 rather than let's keep talking about it and passing up
48 sometimes to leadership that don't grab paper and move
49 tools and punch keyboards, right. So we're looking for
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1 this keyboard lawyer next generation that can really
2 dial down these issues and make it pertinent to protect
3 your way of life because this is your Alaska so we
4 appreciate you guys' enthusiasm.

5

6 I think we have -- oh, Jack, yes.

7

8 MR. REAKOFF: Mr. Chair, I worked with
9 Heather Bauscher for years on this project, did
10 interviews, virtual interviews with her students.
11 She's funded through the Agricultural Department,
12 Forest Service. I feel that DOI needs to not run OSM,
13 but DOI needs to prime the program like this for the
14 rest of the state of Alaska so that we can have the
15 same kind of effect on our -- you see the kind of
16 quality commentors we're getting out of these students,
17 we are asking for young people to join these Regional
18 Councils and this is -- this has -- this is the funding
19 source is necessary so I would -- if DOI's listening
20 they need to cough up some money for a program similar
21 to this for the rest of Alaska.

22

23 Thank you, Mr. Chair.

24

25 CHAIRMAN CHRISTIANSON: Thank you,
26 Jack, and appreciate the comments. We do have two more
27 public this morning, two green cards.

28

29 MS. LAVINE: Thank you, Mr. Chair. We
30 have two more people who signed up for testimony and I
31 would remind everybody that this is an opportunity
32 that's available every morning. And so after these two
33 I imagine we can proceed with the meeting.

34

35 Next on our list is Emily Edenshaw.
36 Emily, please address the Board.

37

38 (Pause)

39

40 MS. EDENSHAW: (In Native). Good
41 morning. I apologize. I was having a heart to heart
42 with my president. Good morning. My English name is
43 Emily Edenshaw. I am both Yup'ik and Inupiaq. I am a
44 tribal citizen of the Native Village of Emmonak. I'm
45 also a shareholder of Doyon and Calista. I was also
46 ceremonially adopted an old (indiscernible), I'm a
47 Raven Thunderbird woman. I have the honor to serve as
48 the CEO and tribal administrator of Ketchikan Indian
49 Community. I have some prepared remarks that I would
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1 like to share with the Board.

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4 So good morning (in Native) Chair and
5 members of the Federal Subsistence Board. My name is
6 Emily Edenshaw. I serve as the Tribal Administrator of
7 KIC. I come before you today with both a professional
8 responsibility and a personal conviction. I want to
9 begin by sharing something deeply personal. I am truly
10 proud, proud to live in a rural community. That is
11 something I did not grow up with, I did not always have
12 consistent access to the land, to traditional foods or
13 to the systems of knowledge that many here know are
14 foundational to who we are as indigenous people.
15 Because of that I carry a firsthand understanding of
16 both sides of what it means to be disconnected from
17 subsistence and our traditional ways of life and what
18 it means to reclaim them. I have experienced the
19 struggle of not having access, of not knowing and of
20 trying to find your place. But I also have experience
21 of success, of learning, of harvesting, of processing
22 foods for the family in Hydaburg and in Ketchikan, of
23 reconnecting to culture and of seeing what happens when
24 a community has access to its resources. This is what
25 rural -- this is what rural Alaska represents. It's
26 not just geography, it's identity, it is survival and
27 it is continuity.

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And in Ketchikan, Ketchikan Indian
Community it is the heartbeat of our community. We are
not just a tribal government, we are the provider of
essential services, a cultural anchor and for many the
bridge between hardship and stability. Whether if it
is healthcare, food security, shelter or cultural
programming we are there every day meeting our people
where they are. Subsistence is not theoretical for us,
it is lived, it is practiced and it is necessary. That
is why I am here today with a very clear request. On
behalf of Ketchikan Indian Community I ask you to
reaffirm and to protect the Federal Subsistence
Management Program as it was intended. I ask that you
keep the Federal Subsistence Board intact. I ask that
the Office of Subsistence Management remain where it
is, grounded in the structure that understands and
prioritizes rural needs. And importantly I want to
emphasize that the current rural designation process is
working. It is functioning as it was designated to and
designed to, grounded in data, law and lived reality.
It provides a clear and consistent framework for
determining eligibility and it should remain as is. We

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1 should not be reinvesting or weakening a system that is
2 already doing what it was intended to do. And most
3 importantly I ask you to uphold rural priority because
4 without rural priority there is no meaningful
5 protection of subsistence.

6
7 I would also like to -- I would also
8 like to go on record and say that a unified system that
9 requires Alaska Native people and rural residents to
10 give up their Federally protected priority is not
11 unity, it is erasure. The rural priority exists
12 because it must, it is a recognition backed by law and
13 history that rural communities depend on these
14 resources not for sport, not for recreation, but for
15 survival. We cannot ignore that reality without
16 causing real harm. Federal management exists for a
17 reason. It was established to ensure that subsistence
18 users, particularly in rural Alaska, are protected when
19 State systems fail to meet that obligation. Weakening
20 that framework would not create fairness, it would
21 create inequity. I urge you to stay grounded in the
22 original intent of this program, protect the structure,
23 protect the process and protect the priority and please
24 protect the people because for a community like mine
25 this is not about policy language, it is about whether
26 our children, my children, will have the same
27 opportunities to learn, to harvest and to live in
28 connection with the land, with our cultures and with
29 our communities. I stand here today not just as a
30 leader, but as someone who has had the opportunity to
31 find her way back to our lifeways and who now works
32 every day to ensure that others do not lose them.
33 Please I ask you all to stand with us.

34
35 Thank you for your time, thank you for
36 your service and thank you for your commitment to rural
37 Alaska. (In Native)

38
39 CHAIRMAN CHRISTIANSON: Thank you,
40 Emily. Any questions or comments for Emily.

41
42 (No comments)

43
44 CHAIRMAN CHRISTIANSON: Appreciate your
45 testimony this morning and the work you do in our area.

46
47 MS. LAVINE: This is our last speakers
48 to provide testimony today are Joe and Molly Chythlook.

49
50

1 MR. CHYTHLOOK: Well, I guess I've been
2 chosen by Joe and Molly's family to say a few words. I
3 don't have anything written and I've heard most
4 everything that's -- that has been said for many years.
5 Both my wife and I have spent a good share of our life
6 serving in the public sector, both on the State and
7 Federal level and then also with our village
8 corporations and our regional corporations, AFN and
9 several different Boards that's we've got into. And I
10 just want to get up here and say that I appreciate what
11 you guys are trying to do. You're part of a group of
12 people that have been appointed by different
13 governments or in this case our Federal government, to
14 try to make this Federal subsistence work for all
15 people that are involved here. And from my personal
16 experience as Regional Coordinator for Bristol Bay on
17 the Board of Fish and Board of Game level I know how
18 hard it is to be in a position where you are and at the
19 same time, you know, what you have heard is reality and
20 people have been able to come up and tell you what they
21 feel, what they think is important. And I think in
22 your position you realize that -- how important it is,
23 tradition. And sometimes, you know, people think that
24 just because they come up here and say something that
25 things are going to change overnight. And that has
26 never happened in my -- in my lifetime.

27
28 I guess I've been a Yup'ik for about 83
29 years and when I was -- when I was born I -- and
30 started realizing what was happening I spoke my Native
31 language and what I didn't realize is that in the
32 village of Togiak which had moved from the east side to
33 the west side, and as a result the government reneged
34 their responsibility to our people and did not move the
35 school building from one side to the other. So for
36 about 20 years there was no education offered to my
37 older brothers and others about that age that his group
38 that could have been educated for 20 years. Finally in
39 19 -- I couldn't remember, 1954, '52, somewhere in
40 there, '52 I was nine years old, one of our churches
41 started a school in Togiak and another one too. And as
42 a result the government realized that they had -- maybe
43 they ought to get back and do something. And that's
44 how -- somehow I think governments overlook problems
45 that the people have when they don't understand the
46 affects that may cause on a community.

47
48 And having been part of the process in
49 trying to address some of these concerns I realize how
50

1 hard it is and also realize how much -- it is a
2 sacrifice too when you're appointed to sit on the seats
3 where you are because it takes a lot of time and
4 effort. However the responsibility still stands that
5 after you're here -- once you're here that you try to
6 determine what would be the best answer to some of the
7 concerns that you heard people express for last several
8 days or so. And it's a tough job, folks, but I know
9 that you can do it. What I also appreciate about this
10 Board is that there's a lot more younger Native people
11 sitting on this Board. When I first attended a Federal
12 Subsistence Board meeting a few years back it was
13 composed mainly of government people. Now we have some
14 people who are representing us from our different
15 regional communities. And I appreciate that.

16

17 And also just from a blurry today I
18 also realize that things change through the years. I
19 have -- my wife and I have been married for going on 59
20 years. There's things that makes a difference that in
21 spite of a change when you're relating to people you
22 need to make a commitment for a lifelong relationship,
23 as long as you can to try to help people in the instant
24 that you are faced in. You know, my wife and I we've
25 raised three boys and we're proud that we've been able
26 to at least give them some instruction in life to where
27 I think when we pass on I hope that they will continue
28 to be responsible to help people wherever they can.

29

30 And, you know, I could have said a lot
31 of things either positive or negative about the process
32 here, but having been involved and I notice that there
33 are things that need to be fixed. As an Alaska Native
34 when the State of Alaska came into play my immediate
35 family on my father's side being living in Togiak were
36 the first to be arrested by people for trying to hunt
37 in the traditional way that they used to hunt prior to
38 statehood. And that created a rift for many years
39 between our people and the State of Alaska and
40 sometimes a misunderstanding to all agencies in trying
41 to help our people. Because we thought telling the
42 people and spending time prior to closing Round Island
43 and turning it into a State sanctuary they and the
44 Native people in Togiak were not able to understand why
45 they were arrested. And so when Molly and I got to
46 work in the -- in the 2000s, my -- my job started in
47 1988 I think it was, 2000 -- yeah, 1988 and Molly was
48 prior to that and we spend time trying to help our
49 people to understand, you know, given time process can
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1 work, but in order to make it work we have to try to
2 understand where everybody's coming from and listen and
3 then try our best to I guess come up with the
4 regulations that will address what is being brought
5 before them.

6

7

8 So but anyway I just wanted to mention
9 that whatever you've heard so far I think from
10 different people I know it's a lot on your mind, but I
11 know that in the outcome and I trust that you will do
12 your best job and this is will not be the end of the
13 discussion. I know we -- after I retired from being a
14 port support I'm back on Nushagak Advisory Committee.
15 I still want to be involved. And I don't know how long
16 I will live, but and I've also been on BBNA for 35, 36
17 years, my term was up this year, but I thought I was
18 young enough to submit an application to run again
19 because I want to help my people. And I applaud you
20 folks and I applaud everybody throughout the state of
21 Alaska who have been places like Molly and I and have
22 tried to support their people to under they're complex
23 issues that we're face with, Alaska Native people. But
24 then working together and understanding each other
25 better we can accomplish a lot.

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And so I guess that you don't -- I
don't have any notes, but I thought I would -- I guess
as an old elder I've had a lot to think about my
participation and whether it's been effective or not,
but as I look back and see some of the changes which
are positive, sometimes few, but still some positive
changes have taken place. I guess I can rest and say
that it's been worth it. And I guess my wife didn't
want to come up and -- in our family we have a joke
that says I -- I ask the boys, you know, I always have
the last word, they all laugh, they know mamma does.

(Laughter)

MR. CHYTHLOOK: But anyway thank you
for the opportunity to say what I wanted to say today
and I also want to thank all the people who had the
courage to come up and say what's in their heart and
all the reports that have been given by all the Staff
and both on the Federal and State side. We try to make
this meeting one that will produce a result that will
be good for all people. So thank you very much for
this opportunity, Mr. Chair.

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1 (Applause)

2

3 CHAIRMAN CHRISTIANSON: Me first,
4 Frank. I'm just teasing Frank there.

5

6 But yeah, I'd like to thank you for --
7 Mr. Chythlook, for your comments this morning, your
8 leadership all these years and I think you do a good
9 job because your son got up earlier and did a wonderful
10 job presenting his new position and unifying the tribes
11 and the voice on the salmon crises that we're facing.
12 And so and you're still applying for Boards at 83,
13 these little youngsters here need to grab inspiration
14 and see how hard the trail really is and how long it
15 can be when you fight for your community. And so I
16 appreciate you guys' wealth of knowledge and the
17 investment of time you've taken over time and the
18 drastic change you've seen in the lifestyle of Alaska
19 Natives.

20

21 So appreciate it here.

22

23 Frank.

24

25 MR. WOODS: Well, my turn. I might be
26 accused of being passionate, I might be accused of
27 being too talkative, that couple back there is
28 responsible for that. I can say that Molly was my boss
29 early in my career in Natural Resources at BBNA. I had
30 engagement with ADF&G doing all the surveys for Beluga
31 whale, otter, migratory birds, harvest surveys for
32 moose, caribou.

33

34 Joe and Molly are instrumental in
35 helping the State of Alaska write the Intensive
36 Management Plan for the region of Bristol Bay that is
37 helping cull the populations of predators and that
38 could be a negative or a positive impact on the State
39 and Fed side. When I was told I could not implement a
40 predator control program and you could not say predator
41 at that time without being attacked in every arena on
42 the Federal side and the State side because the State
43 got sued every time you mentioned it.

44

45 Molly and Joe were helpful in
46 implementing all the Fish Board regulations and policy
47 for all of Bristol Bay. Under that regime we took up
48 all the surveys that helped implement the Alaska
49 Migratory Bird Co-Management Council.

50

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1 I remember when Molly appointed Staff
2 and me to do those surveys and handwrite policy. We
3 were handwriting policy with Togiak and representatives
4 from Kodiak on emperor goose problem. That's how
5 important this is.

6
7 And their life dedication not just for
8 the process, but this process. And that's a
9 commitment. I'd like to comment you again, thank you
10 very much, Molly and Joe and your family and your
11 rewards are being reaped as we speak not just for the
12 community, but as -- personally I steam with Joe as
13 much as I can and he is the champion at the steambath.

14
15 (Laughter)

16
17 MR. WOODS: And we have something to
18 compare it. We call it Joe Hot back home so when
19 everybody mentions we're having a Joe Hot tonight we
20 know -- I start sweating.

21
22 So thank you very much for your love
23 and compassion for representing our people.

24
25 Thank you.

26
27 CHAIRMAN CHRISTIANSON: Thank you,
28 Frank. Yes.

29
30 MS. JOHN: Mr. Chairman, Jolene John,
31 BIA Alaska region. I've gotten to know Joe and Molly
32 through personal family extensions and first it was all
33 on the, you know, community gatherings and then later
34 on in -- as I grew up I'm learning how much they have
35 contributed to many things in the Bristol Bay region
36 and for all of rural Alaska. So (in Native). And
37 they're both very lovable, adorable and humble and (In
38 Native) oh, not excite that and (in Native).

39
40 CHAIRMAN CHRISTIANSON: I think that's
41 it. And so I bet you he can handle that because it's
42 pretty hot in Molly's kitchen I'd imagine.

43
44 (Laughter)

45
46 CHAIRMAN CHRISTIANSON: Pretty hot. So
47 thank you, guys. We're going to take a five minute
48 break, we're going to come back and conclude the --
49 start the business of the day.

50

0190

1 (Off record)

2

3 (On record)

4

5 CHAIRMAN CHRISTIANSON: And if we could
6 all make our way back to our seat.

7

8 All right. We're going to get started.
9 And before we do start with the order of business we're
10 going to also every day now that we have concluded our
11 public testimony for the morning we offer an
12 opportunity for the public to speak to the consensus
13 agenda if there is anybody who would like to see
14 something that is on there and speak with a Board
15 member up here who has a different opinion, this is
16 your opportunity to speak to it. So we'd like to offer
17 that each and every day, this is your opportunity.

18

19 (No comments)

20

21 CHAIRMAN CHRISTIANSON: All right.
22 Hearing and seeing none, we're going to move on to
23 WP26-77.

24

25 MS. LAVINE: People online, please
26 check your phone or your Teams to make sure you are
27 muted.

28

29 Thank you.

30

31 CHAIRMAN CHRISTIANSON: All right.
32 This one is an Eastern Interior. Charlie, was there
33 something you wanted to speak to on this one?

34

35 MR. WRIGHT: Yes, sir. Thank you, Mr.
36 Chair. We want to defer this proposal back to the area
37 and we want to talk to the tribes. We've only had a
38 chance to talk to one of them and I will not go forward
39 without talking to them, that's not the right way. So
40 we'll be either adding it to the next meeting or the
41 next cycle, we'll know when we're done talking to those
42 other tribes how we'll go forward.

43

44 Thank you, Mr. Chair.

45

46 CHAIRMAN CHRISTIANSON: Okay. Thank
47 you, Charlie. There's a request to defer this to the
48 next based off of the lack of involvement of the other
49 Regional Advisory Council. And he would like more
50

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1 time. So that would get us through -- so if there is a
2 motion that would like to be entertained by the -- the
3 floor is open to the.....

4

5 MS. BOARIO: Mr. Chair, Fish and
6 Wildlife Service. I move to defer proposal WP26-77 in
7 support of the Eastern Interior Regional Advisory
8 Council to the next wildlife cycle.

9

10 CHAIRMAN CHRISTIANSON: There is a
11 motion. Can we get a second?

12

13 MS. PITKA: I'll second. Public Member
14 Rhonda Pitka.

15

16 CHAIRMAN CHRISTIANSON: Motion made and
17 seconded. Well, we need clarification for the record.
18 Is it the next wildlife cycle or is it the next Fishery
19 meeting.

20

21 MR. WRIGHT: They -- the next Fisheries
22 meeting or next round, but we want to do it at the next
23 meeting if we -- just to keep the ball rolling. And
24 we'll know after we talk to the tribes what we'll do so
25 I can't really give you a clear answer right now, but
26 time will tell.

27

28 CHAIRMAN CHRISTIANSON: So we'll say to
29 the Fisheries meeting. Let the record reflect the
30 motion should say to the next Fishery meeting.

31

32 Thank you.

33

34 MS. BOARIO: Mr. Chair.

35

36 CHAIRMAN CHRISTIANSON: Yes, sorry.
37 You have the floor.

38

39 MS. BOARIO: I remove to defer proposal
40 WP26-77 in deference to the RAC and in support of the
41 RAC until the next Fishery cycle.

42

43 CHAIRMAN CHRISTIANSON: Okay. Thank
44 you. And that -- that did get a second from Rhonda.
45 So.....

46

47 MS. PITKA: I concur. Thank you.

48

49 CHAIRMAN CHRISTIANSON: Any comments or

50

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1 discussion from the Board.

2

3 (No comments)

4

5 CHAIRMAN CHRISTIANSON: We'll go ahead
6 and do a roll call.

7

8 MS. LEONETTI: Okay. Just to restate
9 the motion again. WP26-77, the motion is to defer as
10 recommended by the Eastern Interior Council until the
11 February, 2027 Fisheries meeting.

12

13 Public Member Pitka.

14

15 MS. PITKA: Yes.

16

17 MS. LEONETTI: Fish and Wildlife
18 Service, Member Boario.

19

20 MS. BOARIO: Fish and Wildlife Service
21 supports.

22

23 MS. LEONETTI: BIA Member John.

24

25 MS. JOHN: BIA votes to defer as
26 recommended.

27

28 MS. LEONETTI: Public Member Oney.

29

30 MR. ONEY: Support to defer.

31

32 MS. LEONETTI: Public Member Woods.

33

34 MR. WOODS: Vote yes, public Member
35 Woods.

36

37 MS. LEONETTI: Public Member Payenna.

38

39 MR. PAYENNA: Public Member Payenna
40 votes yes.

41

42 MS. LEONETTI: BLM Member Pendergast.

43

44 MR. PENDERGAST: Aye.

45

46 MS. LEONETTI: Park Service Member
47 Striker.

48

49 MR. STRIKER: Park Service supports.

50

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1 MS. LEONETTI: Forest Service Member
2 Ingersoll.

3
4 MR. INGERSOLL: Forest Service
5 supports.

6
7 MS. LEONETTI: And Chair Christianson.

8
9 CHAIRMAN CHRISTIANSON: I support as
10 stated.

11
12 MS. LEONETTI: Thank you. The motion
13 to defer is passed unanimously.

14
15 CHAIRMAN CHRISTIANSON: All right.
16 We're moving on to the Northwest Arctic. Next will be
17 WP26-65, Unit 23 muskox.

18
19 MS. PITKA: Tony, while we wait I'd
20 like to thank everybody today for their amazing
21 testimony on non-public agenda items. I think that is
22 such an important opportunity to maintain and I truly
23 appreciate all the words today.

24
25 Thank you.

26
27 CHAIRMAN CHRISTIANSON: Thank you,
28 Rhonda.

29
30 MR. UBELAKER: I apologize, Mr. Chair.
31 I'm having some technical difficulties. Give me just
32 half a second to get my stuff open.

33
34 (Pause)

35
36 MR. UBELAKER: Okay. I apologize for
37 the delay. Good morning, Mr. Chair, Board members.
38 For the record my name is Brian Ubelaker, I'm a
39 Wildlife Biologist with OSM and I will be giving you a
40 brief summary of proposal WP26-65 regarding muskox in
41 Unit 65 -- in Unit 23. Excuse me. This proposal --
42 the analysis can be found on page 1295 of your meeting
43 books.

44
45 Wildlife Proposal WP26-65 submitted by
46 the Northwest Arctic Subsistence Regional Advisory
47 Council requests to establish a muskox hunt in Unit 23
48 remainder. The proponent states their intent is to
49 provide Federal opportunity for residents of Selawik.

50

1 Recently muskox sightings have increased around
2 Selawik, but unlike other areas of Unit 23 there is no
3 open season.

4
5 Muskoxen are seen as a new potential
6 source of meat since caribou and salmon have been
7 declining. According to the proponent there are
8 currently muskox hunts in other areas of Unit 23, but
9 those hunts are difficult for Selawik residents to
10 access. The proposed regulation would open an area
11 more easily accessed by residents in Unit 23 remainder
12 and allows for one bull muskox by Federal drawing or
13 State permit from August 1st through March 15th which
14 would mirror existing hunts elsewhere in Unit 23.

15
16 Muskox management on the Seward
17 Peninsula has evolved from a more liberal approach in
18 the 1990s which emphasized local involvement in
19 expanding access through limited Federal subsistence
20 hunts to a more conservative harvest system of today.
21 Over the years regulatory action including aligning
22 Federal and State regulations, establishing
23 registration permits, quota systems and matching season
24 dates to balance hunter access with protection during
25 sensitive periods.

26
27 In Unit 23 southwest cooperative
28 management helped address access challenges and low
29 hunter success through combined permits and aligned
30 regulations. However population declines in late 2000s
31 led to more restrictive measures including the
32 elimination of cow harvest, threshold based permit
33 systems, limited permits and closures of Federal public
34 lands. Since 2020 management has remained conservative
35 with most closures retained though Unit 23 southwest
36 saw a partial reopening of Federal lands in 2024
37 reflecting ongoing reliance on local input with
38 conservative framework.

39
40 Muskox populations on the Seward
41 Peninsula are currently stable and healthy with
42 indications that numbers are meeting or exceeding
43 management objectives and the herds show good
44 distribution across their available range. Bull/cow
45 ratios remain strong which indicate there are mature
46 bulls available for harvest while still maintaining
47 herd productivity.

48
49 While there are three distinct
50

1 populations of muskox in Unit 23, those being the
2 Seward Peninsula, Cape Krusenstern and Cape Thompson
3 populations, little is currently known about the muskox
4 population in Unit 23 remainder. No official surveys
5 have been conducted there so it is unknown whether
6 these muskoxen are resident or transient. There's also
7 no data showing which population these muskoxen belong
8 to, either the Seward Peninsula or the Cape Thompson.
9 Without that information it's impossible to determine a
10 sustainable harvest level. Because muskox populations
11 are small and highly vulnerable to overharvest this
12 lack of data presents serious risk.

13
14 Reported harvest in Unit 23 has
15 remained within establish quotas. Most of this harvest
16 is being carried out by Kotzebue and Noorvik residents
17 using State permits. Federal harvest on all three
18 muskox groups in Unit 23 remains very low. Levels of
19 participation remain steady and there is no evidence
20 that harvest is negatively affecting the population.

21
22 Several alternatives were considered
23 during the analysis phase of this proposal including
24 limited the hunt only to Selawik River drainage,
25 delegating the authority to the Selawik Refuge manager
26 and extending the season closing date to March 31st.
27 None of these alternatives were considered further
28 because they all depend on having solid biological data
29 with which to manage the hunt.

30
31 Establishing a Federal muskoxen season
32 in Unit 23 remainder would provide additional
33 opportunity for residents of Selawik who currently have
34 no easily accessed Federal opportunity. Conservation
35 concerns could be mitigated through the use of harvest
36 quotas, drawing permits and establishment of an in-
37 season manager. However muskoxen need to be closely
38 managed due to their susceptibility to overharvest.
39 Proper management of this sort comes from information
40 provided by basic population data which doe not
41 currently exist for this population of muskoxen.
42 Without this basic knowledge no informed decision can
43 be made regarding the management of this population.

44
45 Therefore it is OSM's conclusion to
46 oppose proposal WP26-65. Establishment of a hunt on
47 this population of musk -- muskoxen without basic
48 population data may result in overharvest. Gathering
49 of population metrics through surveying is required
50

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1 prior to proper hunt management. Once this data is
2 collected and analyzed a harvestable surplus may be
3 identified.

4

5 And with that I'd be happy to answer
6 any questions.

7

8 CHAIRMAN CHRISTIANSON: Thank you for
9 the presentation. Any questions from the Board for
10 Staff.

11

12 (No comments)

13

14 CHAIRMAN CHRISTIANSON: Thank you.
15 Appreciate that. Next we'll go to summary of written
16 public comment.

17

18 MR. UBELAKER: Mr. Chair, there were no
19 written public comments submitted for this proposal.

20

21 CHAIRMAN CHRISTIANSON: Thank you.
22 Summary of tribal government, Alaska Native corporation
23 comments.

24

25 MR. LIND: Thank you, Mr. Chair, Board
26 members. Orville Lind, Native Liaison for OSM. During
27 the consultation sessions we did not have any comments
28 or resolutions for this proposal.

29

30 Thank you, Mr. Chair.

31

32 CHAIRMAN CHRISTIANSON: Thank you.
33 Tribal, Alaska Native organization testimony.

34

35 (No comments)

36

37 CHAIRMAN CHRISTIANSON: Hearing or
38 seeing none, we'll move on to Advisory Group testimony,
39 Subsistence Resource Commission, State Advisory
40 Committee, multiagency work group.

41

42 MS. LAVINE: Thank you, Mr. Chair. We
43 have two comments from the SRCs. The Kobuk Valley SRC
44 met on March 12th and 13th of this year. The Kobuk
45 Valley Subsistence Resource Commission has reviewed 26-
46 65 and supports this proposal as written. Their
47 justification is the SRC reviewed OSM's analysis,
48 looked over options A and B and heard from Selawik
49 National Wildlife Refuge manager. The SRC believes
50

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1 that there needs to be further research into this
2 expanded population, more in depth discussions on
3 better ways to manage muskoxen especially around
4 communities and has questions about ultimate population
5 goals of the herd. The SRC believes that local people
6 should have as much opportunity as possible to harvest
7 these animals and support opening the harvest to more
8 of this opportunity.

9

10 Thank you, Mr. Chair. Oh, and now the
11 Cape Krusenstern Subsistence Resource Commission
12 supports 26.65 as written.

13

14 Thank you, Mr. Chair.

15

16 CHAIRMAN CHRISTIANSON: Thank you. Any
17 public testimony here or online.

18

19 (No comments)

20

21 CHAIRMAN CHRISTIANSON: Hearing and
22 seeing none, Council recommendations.

23

24 Northwest Arctic.

25

26 MS. PILCHER: This is Nissa Pilcher for
27 the record, Council Coordinator for Northwest Arctic
28 speaking for the Council today. The Council opposed
29 WP26-65 which they did submit. After hearing
30 population information from relevant agencies the
31 Council believes that there are too many unknown and
32 data gaps to establish this hunt at this time. The
33 Council noted that with subsistence resources across
34 the region becoming increasingly more difficult to
35 harvest there may be a time in the near future when
36 muskoxen become an important food source and at this
37 time it is more important to see if the population can
38 become more established and grow to allow for more
39 harvest in the future rather than to allow a small
40 harvest now.

41

42 Thank you.

43

44 CHAIRMAN CHRISTIANSON: Thank you. Any
45 questions.

46

47 (No comments)

48

49 CHAIRMAN CHRISTIANSON: Hearing and

50

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1 seeing none, thank you.

2

3

Next North Slope RAC.

4

5

MS. CHAPA: Good morning, Mr. Chair, members of the Board. My name is Gisela Chapa, I'm the Council Coordinator for the North Slope Regional Advisory Council. And the Council supported WP26-65 with the belief that it is important to support subsistence users in adjacent regions. Since the Western Arctic Caribou Herd has declined in population size and believe that this opportunity would provide supplemental meat to Unit 23 residents. At the time of the meeting the Council also stated that population estimates are needed since there's no data available since 2009.

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And I also wanted to note that the North Slope RAC met in February, 2026. It was the first meeting of the Council meeting cycle and actually North Slope RAC met in September, 2025, apologize for that, and the Northwest Arctic had their meeting in January, 2025 [sic].

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Thank you.

CHAIRMAN CHRISTIANSON: Thank you. Any questions.

(No comments)

CHAIRMAN CHRISTIANSON: Hearing and seeing none, Alaska Department of Fish and Game.

MR. MULLIGAN: Thank you, Mr. Chair. For the record Alaska Department of Fish and Game opposes the proposal. As you've heard from OSM just for the lack of information, but then also as a misalignment of regulations. Currently there is no State authorized muskox hunt under our own regulations. And I checked back into the records and we have yet to even consider a proposal to open up a hunt in this area.

43

44

45

46

47

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50

Thank you, sir.

CHAIRMAN CHRISTIANSON: Thank you. Any questions from the Board.

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1 MS. BOARIO: Mr. Chair.

2

3 CHAIRMAN CHRISTIANSON: Yes, Sara.

4

5 MS. BOARIO: Thank you, Mr. Chair.
6 Fish and Wildlife Service. Mr. Mulligan, I just noted
7 in the OSM analysis that it encourages ADF&G and
8 Federal land management agencies in the area to
9 cooperate in expanding muskox survey areas in Unit 23
10 remainder so that muskox can possibly responsibly and
11 sustainably be open there. And I just wondered is that
12 something that the State is open to or sees a potential
13 future for, recognizing resources capacity issues, et
14 cetera, in all surveys?

15

16 MR. MULLIGAN: Through the Chair,
17 Member Boario. As you as the head of Fish and Wildlife
18 Service here in Alaska and the other Federal land
19 agencies know that we collaborate in a lot of areas in
20 the State for assessment of a lot of the species. So
21 to join forces in regard to this specific one I can't
22 specifically speak to, but I know a lot of our folks
23 especially in region 5 do collaborate with various
24 agencies. And so I -- it's a safe bet to say they're
25 not going to say no if you guys come into play and say
26 hey, can we share resources to get this done.

27

28 MS. BOARIO: Thank you, Mr. Mulligan.

29

30 CHAIRMAN CHRISTIANSON: Appreciate that
31 question. InterAgency Staff comments.

32

33 MS. LAVINE: Thank you, Mr. Chair. The
34 InterAgency Staff Committee provided their standard
35 comment. I will read it once for the day. The
36 InterAgency Staff Committee found the analysis to be a
37 thorough and accurate evaluation of the proposal and
38 that it provides sufficient basis for the Regional
39 Advisory Council recommendations and the Federal
40 Subsistence Board action on this proposal.

41

42 Thank you.

43

44 CHAIRMAN CHRISTIANSON: Thank you.
45 Board discussion with Liaison, Council Chair and State
46 rep. This is an opportunity for us to get some
47 clarification if we need some before we open the floor
48 for Board motion.

49

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0200

1 (No comments)

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CHAIRMAN CHRISTIANSON: Hearing and seeing none, the floor is open for Board action.

MS. BOARIO: Mr. Chair.

CHAIRMAN CHRISTIANSON: You have the floor, Sara.

MS. BOARIO: Mr. Chair, Fish and Wildlife Service moves to support WP26-65 and if I get a second I will share my rationale for why I will vote to oppose my motion.

MR. PENDERGAST: BLM seconds.

MS. BOARIO: The U.S. Fish and Wildlife Service recognizes the Northwest Arctic Regional Advisory Council as well as the North Slope RAC's concern of loss of caribou and salmon in the area along with the high cost of food in the region and the desire to support a hunt for muskox around Selawik in Unit 23. The OSM analysis showed that this unit has not had any official surveys conducted to determine the status of the muskoxen located there, from which population they originate or whether they are transient or resident. Without the formal surveys a harvestable surplus for muskox occurring in Unit 23 remainder cannot be determined. Also per the OSM conclusion the Fish and Wildlife Service is open to working with State and Federal partners to identify ways to support surveys in the future. While the Northwest Arctic RAC was the original proponent of the proposal as we heard after gathering more information the Council believes that there are too many unknowns and data gaps to establish this hunt at this time.

In deference to the Northwest Arctic Council the Fish and Wildlife Service opposes Proposal WP26-65.

Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you, Sara. That opens the floor for Board discussion.

(No comments)

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1 CHAIRMAN CHRISTIANSON: Hearing and
2 seeing none we'll go ahead and do roll call. If we
3 could have the motion read into the record before we do
4 roll call.

5
6 Thank you.

7
8 MS. LEONETTI: Thank you, Mr. Chair.
9 The motion is to adopt WP26-65 which would establish a
10 muskox hunt around Selawik in Unit 23 remainder. I'm
11 going to mix it up.

12
13 Forest Service, Member Ingersoll.

14
15 MR. INGERSOLL: Forest Service opposes
16 the motion in deference to the Northwest Arctic RAC and
17 our colleagues in the Fish and Wildlife Service.

18
19 MS. LEONETTI: Park Service Member
20 Striker.

21
22 MR. STRIKER: I may be confused here.
23 I thought the motion was to oppose.

24
25 CHAIRMAN CHRISTIANSON: The motion will
26 always be to the positive and then we vote on it up or
27 down.

28
29 MR. STRIKER: I support opposing for --
30 in deference to the Northwest Arctic RAC and for the
31 reasons so eloquently stated by my colleague from Fish
32 and Wildlife.

33
34 MS. LEONETTI: Thank you. BLM, Member
35 Pendergast.

36
37 MR. PENDERGAST: BLM opposes for the
38 reasons stated by the Fish and Wildlife Service.

39
40 MS. LEONETTI: Public Member Payenna.

41
42 MR. PAYENNA: Public Member Payenna
43 opposes in deference to the RAC and the comments
44 submitted by Ms. Boario.

45
46 MS. LEONETTI: Public Member Woods.

47
48 MR. WOODS: Public Member Woods opposes
49 with the recommendations of the RAC and OSM's
50

0202

1 conclusions that -- yeah, conclusion at the end of
2 their assessment. So public Member Woods opposes.

3

4 MS. LEONETTI: Public Member Oney.

5

6 MR. ONEY: Public Member Oney motions
7 to oppose.

8

9 MS. LEONETTI: BIA Member John.

10

11 MS. JOHN: BIA votes to oppose WP26-65
12 as recommended by and per the justification of the
13 Northwest Arctic RAC. I appreciate that there has been
14 expression for need for sufficient data, we concur with
15 the Council and Fish and Wildlife's justification for
16 this recommendation and appreciate their considerable
17 efforts on this proposal.

18

19 MS. LEONETTI: Fish and Wildlife
20 Service Member Boario.

21

22 MS. BOARIO: Fish and Wildlife Service
23 votes to oppose.

24

25 MS. LEONETTI: Public Member Pitka.

26

27 MS. PITKA: I vote no on this proposal
28 in deference to the Northwest Arctic Regional Advisory
29 Council and the recognition that there is not enough
30 information and data on this particular species.

31

32 Thank you.

33

34 MS. LEONETTI: And Chair Christianson.

35

36 CHAIRMAN CHRISTIANSON: I vote to
37 oppose as stated by Rhonda.

38

39 MS. LEONETTI: Mr. Chair, the motion to
40 adopt WP26-65 fails.

41

42 CHAIRMAN CHRISTIANSON: Thank you.
43 We'll move on to the next proposal which is 26-66.

44

45 MS. LEONETTI: Page 351 in your books.

46

47 CHAIRMAN CHRISTIANSON: Staff, you have
48 the floor.

49

50

0203

1 MR. PLANK: Thank you, Mr. Chair,
2 members of the Board. My name's Tom Plank, Wildlife
3 Biologist with the Office of Subsistence Management.
4 And I will be presenting a summary of the analysis for
5 Wildlife Proposal WP26-66. And as you already heard
6 it's on page 351 in your books.

7
8 So Wildlife Proposal WP26-66 was
9 submitted by the Northwest Arctic Council and it
10 requests to increase the harvest limit and extend the
11 season for wolf hunting in Unit 23 to match State
12 regulations. The proponent states that aligning the
13 Federal wolf hunting regulations to match the State
14 hunt will help reduce confusion and increase
15 opportunity. Hunters have indicated an increased wolf
16 population in Unit 23. The Unit 23 Federal wolf
17 hunting season and harvest limits were adopted from the
18 State regulations when the Federal Subsistence Program
19 began in 1990. The Unit 23 Federal wolf hunting
20 regulations changed to the current regulations in 2005.
21 The State liberalized wolf hunting harvest limits for
22 the 2002, 2003 season and then to the current 20 wolves
23 in 2024/'5 season. In 2007 the Board of Game increased
24 the Unit 23 wolf hunting season opening August 1st
25 instead of August 10.

26
27 Wolves occur throughout Unit 23.
28 Although biological information is extremely sparse
29 their current status and abundance are unknown. While
30 there have been no unit wide surveys of the wolf
31 population for Unit 23 testimony provided during
32 Northwest Arctic Council meetings attests that the
33 local abundance of wolves in Unit 23 is high including
34 in areas close to communities. In 2020 the National
35 Park Service began a pilot study within Noatak National
36 Preserve titled Evaluating the Feasibility of Mixed DNA
37 Sampling to Obtain Wolf Population Demographics in
38 Northwest Alaska. And the purpose of the study is to
39 try and gain more knowledge in local wolf demographics
40 and behavior using genetics and observational methods.
41 Spring aerial den surveys conducted from 2020 to 2022
42 estimates four to five active wolf groups within the
43 Noatak National Preserve.

44
45 Wolves are required to be sealed
46 although compliance with State fur sealing program is
47 low in Unit 23. Therefore the harvest levels reported
48 should be viewed as minimal estimates of harvest. In
49 Unit 23 wolves are primarily harvested by local
50

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1 residents with firearms and by snowmachines. Local
2 hunters are opportunistic and will harvest wolves
3 incidental to travel between villages or while hunting
4 caribou typically taking as many wolves as possible
5 during these opportunities. From 2018 to 2022 most
6 reported wolf harvests occurred in September and March
7 and few wolves were reported harvested in August,
8 October or November.

9
10 One alternative considered is to
11 exclude the Kobuk Valley National Park and Cape
12 Krusenstern National Monument from the harvest limit
13 increase and season extension. These areas are closed
14 to anyone hunting or trapping under State regulations.
15 Excluding these areas from the harvest limit increases
16 and season extension could provide refugia and would
17 represent a conservative approach to the status of the
18 Unit 23 wolf population.

19
20 And their harvest is essentially
21 unknown. This alternative would result in Federal
22 regulations remaining more restrictive than State
23 regulations within the excluded area.

24
25 If proposal WP26-66 is adopted the
26 Federal wolf hunting season would be extended by two
27 months and the harvest limit would increase by five
28 wolves. As 20 wolves can already be harvested on most
29 Federal public lands in Unit 23 from August 1st to
30 April 30th under State regulations. The impact to the
31 wolf population is expected to be minimal, but
32 ultimately.....

33
34 (Indiscernible - teleconference
35 interference)

36
37 MR. PLANK:ultimately uncertain
38 due to the unknown status of.....

39
40 (Indiscernible - teleconference
41 interference)

42
43 MR. PLANK:of the wolf population
44 and harvest in Unit 23. Somebody has their mic on.
45 However.....

46
47 (Indiscernible - teleconference
48 interference)

49
50

1 MR. PLANK: However the trapping limit
2 is no limit and local area residents indicate that the
3 wolf population is increasing and there are no
4 conservation concerns. Harvest in September is
5 primarily of non-resident and local -- non-local
6 hunters who are in the unit for caribou, bear or moose.
7 State regulations do not apply in Cape Krusenstern
8 National Monument and Kobuk Valley National Park.
9 Therefore additional wolves may be harvested from these
10 areas by resident zone communities during August and
11 September if this proposal is adopted.

12
13 Additionally National Park Service
14 lands prohibit the take of free ranging fur bearers
15 with a firearm under a trapping license and while few
16 users likely harvest more than 15 wolves by firearm
17 each year adopting proposal WP26-66 would allow
18 resident zoned communities to harvest an additional
19 five wolves from Cape Krusenstern National Monument and
20 Kobuk Valley National Park by firearm each year.
21 Adopting this proposal would decrease regulatory
22 complexity and confusion by aligning State and Federal
23 regulations.

24
25 So OSM's conclusion was to support
26 WP26-66 with the modification to exclude Cape
27 Krusenstern National Monument and Kobuk Valley National
28 Park. Adoption of this proposal would increase
29 subsistence opportunity and would benefit Federally-
30 qualified subsistence users. Impacts to the wolf
31 population are expected to be minimal as users are
32 already -- may already harvest 20 wolves from August
33 1st to April 30th under State hunting regulations on
34 most Federal public lands in unit 23. And local user
35 report an abundance and increase in wolf population.
36 Additionally Federal and State regulations for wolves
37 in the portion of Unit 23 where State regulations apply
38 would be aligned reducing regulatory complexity. State
39 regulations do not apply on National Parklands
40 including Cape Krusenstern National Monument and Kobuk
41 Valley National Park in Unit 23. Excluding National
42 Park Service managed lands would retain the current
43 Federal regulations as a conservative approach to
44 provide refugia to Unit 23 wolf populations as their
45 population status and harvest is unknown.

46
47 Thank you, Mr. Chair, members of the
48 Board. I'd be happy to answer any questions.

0206

1 CHAIRMAN CHRISTIANSON: Thank you for
2 the presentation. Any questions for Tom.

3
4 (No comments)

5
6 CHAIRMAN CHRISTIANSON: Hearing none,
7 we'll move on to the next portion, summary of written
8 public comment.

9
10 MR. PLANK: Thank you, Mr. Chair. Tom
11 at OSM. There were no written public comments
12 submitted during the open period.

13
14 Thank you.

15
16 CHAIRMAN CHRISTIANSON: Thank you.
17 Summary of tribal government and Alaska Native corp.

18
19 MR. LIND: Thank you, Mr. Chair.
20 Orville Lind, Native Liaison for OSM. During the
21 consultation on April 20th the Native Village of
22 Kotzebue spoke in support of Wildlife Proposal 26-66.

23
24 Thank you, Mr. Chair.

25
26 CHAIRMAN CHRISTIANSON: Thank you.
27 Tribal, Alaska Native organization testimony.

28
29 MS. CRAVALHO: Good morning, Mr. Chair.

30
31 CHAIRMAN CHRISTIANSON: Yes, you have
32 the phone.

33
34 MS. CRAVALHO: Thank you. This Liz
35 Cravalho, Vice President of Lands for NANA. NANA
36 supports the proposal.

37
38 Thank you.

39
40 CHAIRMAN CHRISTIANSON: Thank you. Any
41 Advisory Group testimony, SRC comments, State Advisory
42 or multiagency group.

43
44 MS. LAVINE: Thank you, Mr. Chair. The
45 Kobuk Valley Subsistence Resource Commission supports
46 this proposal as written. SRC members are concerned if
47 the dates and bag limits are not aligned people may
48 misunderstand what they're able to harvest. The SRC
49 understands OSM's analysis and modification to not
50

0207

1 include KAKR and KOVA, but feel that when things --
2 then things will remain misaligned which goes against
3 the point of this proposal. And as the representatives
4 for KOVA and the SRC believes that there is no reason
5 to limit opportunities for harvest in Kobuk Valley
6 National Park especially as increased wolf activity has
7 been noticed.

8

9 And the Cape Krusenstern National
10 Monument SRC supports as written with no modification.

11

12

13 And that is all. Thank you, Mr. Chair.

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And the Cape Krusenstern National Monument SRC supports as written with no modification.

And that is all. Thank you, Mr. Chair.

I'm sorry, and the Gates of the Arctic, Wildlife Proposal 26-66, increase the harvest limit. They voted unanimously to support this proposal. There's a large presence of wolves throughout the whole area and the Northwest Arctic Regional Advisory Council wants to increase the opportunity for people. Residents are out there through all of the seasons and would have the opportunity to harvest wolf throughout different seasons. This would affect the Kobuk Preserve Area within Gates of the Arctic National Park and Preserve and it's foreseen that this would have no affect on the wolf population. Wolves are seen in late September or October and rarely do hunters achieve this large of a bag limit.

Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you. Any public testimony here or online.

(No comments)

CHAIRMAN CHRISTIANSON: Counsel recommendations.

MS. PILCHER: Good morning again. Nissa Pilcher for the record, Council Coordinator for Northwest Arctic. The Council voted to support WP26-66 as modified by OSM. The Council supports the increased hunting opportunity for the take of wolves on Federal public land. The council also noted that aligning the State and Federal harvest limits for wolves will remove the possibility for subsistence users to inadvertently violate the law.

0208

1 Thank you.

2

3 CHAIRMAN CHRISTIANSON: Thank you. Any
4 questions from the Board.

5

6 (No comments)

7

8 CHAIRMAN CHRISTIANSON: Thank you.
9 North Slope.

10

11 MS. CHAPA: Gisela Chapa for the
12 record, Council Coordinator for North Slope RAC. The
13 Council supported WP 26-66 as modified by OSM. The
14 Council supported this proposal due to declines of the
15 Western Arctic Caribou Herd.

16

17 CHAIRMAN CHRISTIANSON: Thank you.
18 Alaska Department of Fish and Game.

19

20 MR. MULLIGAN: Thank you, Mr. Chair.
21 For the record the Alaska Department of Fish and Game
22 supports the proposal and during the ISC meeting we did
23 support OSM's modification, but I will say given what
24 we've heard from the SRCs we would be supportive if
25 given their support of a more inclusive alignment if
26 that is so desired by the Board. I will make note that
27 even though the Federal subsistence regulations have
28 not been liberalized there was nothing prohibiting
29 folks from that region to enjoy the State's
30 liberalization of wolf hunting and trapping in that
31 area and so could take more for that extended amount of
32 time.

33

34 Thank you.

35

36 CHAIRMAN CHRISTIANSON: Thank you for
37 that. We like wolf hunters here. InterAgency Staff
38 Committee.

39

40 MS. LAVINE: Thank you, Mr. Chair.
41 Before I give the InterAgency Staff Committee comment I
42 would like to provide the Cape Krusenstern National
43 Monument SRC's full comment on this and I'm sorry that
44 I -- I kind of jumped over it. So the Cape Krusenstern
45 National Monument SRC has had a chance to review
46 Wildlife Proposal 26-66 that would change the Federal
47 season start date for wolf hunting from October 1st to
48 August 1st and the bag limit from 15 to 20. After
49 reviewing the OSM analysis and their reasoning for
50

0209

1 supporting the proposal, but to specifically exclude
2 Cape Krusenstern National Monument, exclude NPS managed
3 lands that would retain the current Federal regulations
4 as a conservative approach to providing refugia in Unit
5 23 wolf population as their population status harvest
6 is unknown, we have the following comments.

7
8 KAKR is not an ecological refugia for
9 most small mammals, it is the exact opposite in
10 relation to wolves. It does not produce wolves, it is
11 in fact an ecological sink. Wolves rarely if ever
12 breed in KAKR, it is too close to human activity and at
13 the edge of any one pack's territory. The most common
14 pack size of wolves in KAKRC is one to three animals
15 generally encountered in the falltime near the coast
16 that have been pushed out of core wolf territories east
17 and north of KAKR and the Noatak River for one reason
18 or another. These are the animals that are either
19 observed directly or by tracks in the falltime by
20 campers and hunters along the coastline. Taking these
21 animals out of the population does nothing to impact
22 wolf conservation overall nor their social structure.
23 It is statistically insignificant.

24
25 The purpose of KAKR is to maximize
26 subsistence opportunities for Federally-qualified users
27 and support the thriving of the Inupiaq culture. It is
28 not to create a refugia which again even if it were
29 KAKR is ecologically unable to be a refugia because of
30 its marginal habitat, overflow habitat, and from other
31 areas further inland that are refugia by default due to
32 their remoteness and light harvesting pressure if any.
33 The majority of KAKR is at the extreme edge of core
34 habitat of multiple species, wolves being one of them.
35 This proposal should be viewed as a housekeeping
36 proposal and more than any other kind since it will not
37 significantly change the behavior of people or increase
38 the harvest. What it will do is maximize opportunity
39 for subsistence users in CAKR.

40
41 While there is discussion about priming
42 of pelts there's only one consideration in regards to
43 harvesting wolves. While it is true that for the
44 purpose of the fur market wolves taken in August
45 through October are far from prime for the fur market,
46 there are many other reasons and values for why wolves
47 are harvested. First it should be pointed out that
48 wolves only become fully prime sometime in January,
49 before that they are in various stages of pre-prime.

50

0210

1 So focusing on prime is not a useful metric for
2 justifying season dates. Some camper in the falltime
3 may see a wolf when getting water, checking on their
4 dogs, picking berries or riding down the coast. It may
5 be a young person, an elder or middle aged person, male
6 or female that will be -- that will have their own
7 personal reasons for harvesting a wolf and the use it's
8 put to. It's also very likely that it may be the only
9 time in their life that they have an opportunity to
10 harvest a wolf. These scenarios are way more likely
11 than some super hunter loading up for the season -- on
12 early season wolves because of the regulation change.

13

14 Providing these kind of opportunities
15 that maximize subsistence is in part the reason for
16 CAKR. So if anything the change -- the season changes
17 should only apply to CAKR and KOVA, not exclude them.
18 It is also disappointing that OSM is putting forth the
19 notion that using CAKR and KOVA as a refugia when they
20 are ill-informed what they -- when they are ill-
21 informed about the ecology of these areas, the actual
22 uses that occur in these areas and one can only assume
23 based on their discussion the reason for the creation
24 of these areas. Before using reasoning for excluding
25 these Federal units from regulation changes that will
26 increase subsistence hunting opportunities we believe
27 that OSM should actually discuss their position with
28 the Subsistence Resource Commissions that were created
29 to assist the Secretary of Interior with managing
30 subsistence hunting opportunities in these areas.

31

32 The CAKR SRC disagrees strongly with
33 OSM in their modification of the proposal. It will set
34 a bad precedent and a slippery slope for subsistence
35 management for CAKR and KOVA without any conservation
36 benefit. It is basically in our opinion totally
37 gratuitous undermining of the founding purpose of these
38 units and the co-management spirit and intent of ANILCA
39 wherein the Secretary in this case through OSM will
40 look to the knowledge of the Subsistence Resource
41 Commissions to help inform Federal policy when
42 developing hunting regulations in these areas. Their
43 proposed modification should be struck down because it
44 goes against part of the purpose of CAKR and KOVA, but
45 also is a message to do better in the future when
46 creating novel justifications based on theory and not
47 reality for their recommendations.

48

49 The CAKR SRC supports Wildlife Proposal

50

0211

1 WP26-66 with no exclusions for CAKR or KOVA.

2

3 Thank you, Mr. Chair.

4

5 And now the ISC, the InterAgency Staff
6 Committee provided their standard comment.

7

8 CHAIRMAN CHRISTIANSON: Thank you for
9 that. Board discussion with your Liaison, Council
10 Chair or State rep, this is our opportunity to ask
11 questions, clarity.

12

13 (No comments)

14

15 CHAIRMAN CHRISTIANSON: All looks good.
16 All right. We'll go ahead and move to Board action on
17 this.

18

19 MR. STRIKER: Mr. Chair.

20

21 CHAIRMAN CHRISTIANSON: Yes, Don, you
22 have the floor.

23

24 MR. STRIKER: National Park Service
25 moves to adopt proposal WP26-66 as written. And if I
26 get a second I'll explain why I intend to vote in
27 support of my motion.

28

29 MS. PITKA: Public Member Rhonda Pitka
30 supports -- seconds.

31

32 MR. STRIKER: Thank you, Mr. Chair.
33 National Park Service supports WP26-66 as supported by
34 Cape Krusenstern, Kobuk Valley and the Gates of the
35 Arctic SRC. I'll note that while the Northwest Arctic
36 RAC supported the OSM modification their reasons to
37 support did not address excluding Parklands, but
38 overall supporting increased subsistence opportunities
39 for the take of wolves on Federal lands and to align
40 the State and the Federal subsistence regulations so
41 that we -- no one would inadvertently violate the law.
42 I think the testimony we just heard from the SRCs
43 provides substantial evidence in the form of their
44 recommendations that were not available to the RAC at
45 the time of their recommendation.

46

47 And that's sufficient justification for
48 supporting this proposal as written and for the reasons
49 specified by the three SRCs.

50

0212

1 Thank you.

2

3 CHAIRMAN CHRISTIANSON: Thank you, Don.
4 Any further deliberation by the Board.

5

6 (No comments)

7

8 CHAIRMAN CHRISTIANSON: Hearing and
9 seeing none we'll do roll call. Do we read that into
10 the record?

11

12 MS. LEONETTI: Yeah. The motion on the
13 floor is to adopt WP26-66 which is to increase the
14 harvest limit and extend the season for wolf hunting in
15 Unit 23 to match State regulations.

16

17 MS. LEONETTI: BLM Member Pendergast.

18

19 MR. PENDERGAST: BLM votes to support.
20 There's limited survey data on Unit 23 wolf population,
21 but public testimony suggests the local abundance of
22 wolves is high. And the overall wolf harvest is
23 estimated to relatively low. Data suggests that
24 increasing the harvest limit and extending the season
25 for Unit 23 wolves will provide Federally-qualified
26 users additional opportunities to harvest wolves for
27 subsistence uses without significantly impacting the
28 population or causing conservation concerns.

29

30 MS. LEONETTI: National Park Service
31 Member Striker.

32

33 MR. STRIKER: Support.

34

35 MS. LEONETTI: Forest Service Member
36 Ingersoll.

37

38 MR. INGERSOLL: Forest Service supports
39 in deference to the RAC and our colleagues from the
40 Park Service and also to align Federal and State
41 regulations.

42

43 MS. LEONETTI: Public Member Pitka.

44

45 MS. PITKA: I vote to support WP26-66
46 as written in deference to the Regional Advisory
47 Councils and in recognition of the SRC's excellently
48 worded justification.

49

50

0213

1 Thank you.

2

3 MS. LEONETTI: Fish and Wildlife
4 Service Member Boario.

5

6 MS. BOARIO: Fish and Wildlife Service
7 votes to support as written for the reasons articulated
8 by my colleague.

9

10 MS. LEONETTI: BIA Member John.

11

12 MS. JOHN: And BIA votes to adopt as
13 recommended by the National Park Service without the
14 modifications.

15

16 MS. LEONETTI: Public Member Oney.

17

18 MR. ONEY: Public Member Oney moves to
19 support as commented by Rhonda.

20

21 Thank you.

22

23 MS. LEONETTI: Public Member Woods.

24

25 MR. WOODS: Public Member Woods
26 supports WP26-66.

27

28 Thank you.

29

30 MS. LEONETTI: Public Member Payenna.

31

32 MR. PAYENNA: I vote to support WP26-66
33 in deference to the RAC and also agreeing with the
34 comments made by BLM and partners.

35

36 MS. LEONETTI: And Chair Christianson.

37

38 CHAIRMAN CHRISTIANSON: I support for
39 reasons stated on the record.

40

41 Thank you.

42

43 MS. LEONETTI: Okay. The motion to
44 adopt WP26-66 as written passes unanimously.

45

46 CHAIRMAN CHRISTIANSON: We'll come back
47 at 1:30, lunch. Hour and 15, house and 20 minutes.
48 Thank you, guys. We'll be back here.

49

50

0214

1 (Off record)

2

3 (On record)

4

5 CHAIRMAN CHRISTIANSON: If the Board
6 members can hear this, it is 1:31 so we will resume as
7 soon as we have a quorum established here.

8

9 (Pause)

10

11 All right. We're going to go ahead and
12 get started with our presentations this afternoon.

13

14 Did you have something, Robbin.

15

16 MS. LAVINE: Mr. Chair, members of the
17 Board. I know that this is a little out of sequence in
18 regards to our procedures, however we do a member of
19 the community of -- of a southcentral community that
20 has a proposal before you that made travel arrangements
21 based on the original order of the agenda. He would
22 like to give his comments on proposal -- Wildlife
23 Proposal 26-15 before he leaves this evening.

24

25 CHAIRMAN CHRISTIANSON: Okay. Any
26 opposition that he does that now, Board, just for -- so
27 we can clear up, get it off the floor?

28

29 (No comments)

30

31 CHAIRMAN CHRISTIANSON: Okay. We have
32 no opposition to that, we'll take that now.

33

34 MR. JONES: Good afternoon, Mr. Chair,
35 and esteemed members of the Federal Subsistence Board.
36 Thank you for this opportunity and I apologize that I
37 needed to speak out of order. My name is Kenneth B.
38 Jones, I'm a resident of Cordova, Alaska.
39 Unfortunately the change to work the proposals in
40 reverse has created a scheduling conflict and I must be
41 on the ferry traveling home tomorrow for responders
42 training on Friday that I tried to reschedule, but
43 cannot move. I will try to call in, but I'm worried
44 that it may not be a reliable connection on the ferry
45 and appreciate the opportunity to speak with you now.

46

47 I'm a lifelong born and raised local
48 and third generation rural residence of Cordova. I'm
49 also a commercial fisherman, assistant guide, big game
50

0215

1 transporter, waterfowl guide and a sport fish guide. I
2 have dedicated much of my adult life to promoting and
3 preserving the community and opportunities that raised
4 me. While I recently stepped away from public service
5 roles to focus on my family and business over the last
6 15 years I have served four terms as a harbor
7 commissioner, two terms as city councilman and multiple
8 terms as an executive committee member of both CDFU and
9 PWSAC. In more recent years I have focused on
10 purchasing long derelict properties and rehabilitating
11 them to create much needed housing and small business
12 opportunities in my home town. Nearly all of my
13 personal and business resources are reinvested directly
14 back into strengthening the community that I love and
15 have watched struggle since the Exxon Valdez oil spill
16 that drastically damaged and devastated our community
17 and economy.

18
19 I mention this not to talk about
20 myself, but to show that I do not just speak about
21 improving and supporting Cordova, I actively and
22 consistently invest my time, labor and all of my
23 limited resources into doing it. With more and more
24 commercial fishery closures every season coupled with
25 multiple Federally declared disaster returns and the
26 rising cost of insurance, moorage and fuel and having a
27 crew of local guys who all have families and depend on
28 me as their captain to find economic opportunities so
29 they can fee their families. Just -- 10 years ago I
30 launched Serenity Adventures.

31
32 I am here today because this life's
33 work of supporting my community is now being severely
34 threatened by WP26-15. I strongly oppose proposal
35 WP26-15 to close deer hunting access on the
36 transplanted population of Sitka black tail deer for
37 non-Federally-qualified users on Hawkins and
38 Hinchinbrook Island. Anecdotally around town it has
39 become a repetitive narrative that this proposal
40 originated from a personal vendetta by some members of
41 the tribe who were upset by my boats being on the
42 landscape. And as a targeted way to curb or alter my
43 business activities. All despite the many self-imposed
44 practices that I have implemented for local respect and
45 local deference.

46
47 Serenity Adventures, my small, locally
48 owned transporter business, operates in the proposed
49 closure area. We operate DIY, fair chase, mature buck
50

1 only harvest and have self-imposed limits on our
2 clients to promote sustainability and overall herd
3 health. Overall harvest by my clients represents less
4 than 1 percent of the total annual deer harvest and a
5 fraction of a percent of the total mortality when you
6 include winter kill. We are one small transport
7 company in an area and community that when I was
8 growing up had seven legally licensed transporters all
9 operating at the same time. To say that there is a
10 steep increase in activity is false and not supported
11 by the data as seen in the OSM and ADF&G reports. The
12 only thing that has increased is a perception of
13 increased pressure stemming from my social media
14 presence when I ramped up ads to make it yet -- through
15 yet another disaster commercial fishing season in 2023
16 and 2024.

17
18 If passed this proposal would directly
19 and negatively impact the six local hire crew whose
20 households all rely on hosting and transporting a small
21 number of non-Federally-qualified users during the fall
22 season. For my family and the families of the people I
23 employ this work is not some abstract recreational
24 business, it is part of how we were raised, it is part
25 of how we make a living and how we help to put food not
26 just on our tables, but many tables in a remote
27 community where the cost of living is high and these
28 seasonal employment opportunities matter. This would
29 also negatively impact the local ADF&G management
30 budget through the loss of lucrative non-resident tag
31 sales and many of the struggling restaurant and hotel
32 businesses and employees if this were passed.

33 This work also supports our subsistence way of
34 life in another important way. More than half of the
35 deer meat harvested by my clients are donated locally.
36 Much of that meat goes into either my own family's
37 freezer, our extended family's freezer or to the
38 families of my employees, to friends in need and to our
39 church widow program that supports elders and widows in
40 the community. That donated meat helps offset the
41 number of deer our own families need to harvest
42 ourselves in order to maintain a rural subsistence
43 lifestyle. So this proposal would not just affect
44 access, it would reduce food sharing and local food
45 security.

46
47 This proposal would also create harmful
48 social and cultural impacts in our already strained
49 small community. Because of the economic pressures in
50

1 Cordova, high housing costs, limited employment
2 opportunities and access to health care many of the
3 local people that I grew up with have unfortunately had
4 to relocate out of town for one reason or another. If
5 this proposal passes many residents, both tribal and
6 non-tribal members who were born and raised in Cordova,
7 who grew up hunting these lands with their fathers and
8 grandfathers, but who no longer qualify for rural
9 status, will lose the ability to return and hunt the
10 places that shaped their families and their families'
11 traditions. It would also divide families across
12 generations. Children who are non-Federally-qualified
13 would be unable to hunt with their local grandparents
14 on the same lands that their families have used for
15 generations. Instead of preserving traditions this
16 proposal risks breaking those connections and reducing
17 the transfer of hunting knowledge, ethics and family
18 heritage.

19
20 Most importantly this closure is not
21 biologically justified. My clients cumulatively
22 harvest fewer than 60 deer annually. That represents
23 less than 1 percent of total hunting mortality in the
24 area. We conduct a mere six weeks per year of fair
25 chase, buck only style hunts. Meanwhile one boat
26 engaged in December beach hunting can kill more deer
27 than all my clients combined in one weekend. I know
28 because I've done it growing up in the community. And
29 this often includes the harvest of -- the unfortunate
30 harvest of pregnant does. If conversation is truly the
31 concern then this proposal is not targeting the actual
32 source of the pressure which is beach hunting by non-
33 local boats. Which if this is passes would still be
34 allowed as the beaches would remain open because they
35 are State land.

36
37 It is also important to recognize that
38 Cordova and Prince William Sound have experienced
39 different recent winter conditions than parts of
40 southeast Alaska. Our recent winters have been
41 unusually clear, cold and marked by historically low
42 snowpack. We have also had very warm springs and rainy
43 springs. The deer have wintered well under those
44 conditions. ADF&G has theorized that the historically
45 low snowpack over the last three years may be one
46 reason the pellet surveys appear lower because the snow
47 has not been there to push the deer into the transect
48 area for their winter range. And that warm rain in the
49 spring dissolves the pellets before the pellet counts
50

0218

1 can be conducted in the summer. Under these conditions
2 -- so pellet counts under these conditions should not
3 automatically be interpreted as evidence of a low deer
4 abundance.

5
6 Both ADF&G and the OSM oppose this
7 closure and have provided substantial science based
8 analysis showing there is no biological necessity for
9 such an extreme action and that professional input
10 deserves serious consideration and deference. There's
11 also no broad consensus supporting this proposal. Half
12 of the Southcentral Regional Advisory Council opposed
13 it. The local Cordova Fish and Game Advisory Committee
14 made up entirely of Cordova residents opposed it and
15 submitted public comment. The Whittier Fish and Game
16 Advisory Committee opposed it, submitted public
17 comment. The Valdez Fish and Game Advisory Committee
18 opposed it and submitted public comment. The public
19 comment in general has been overwhelmingly opposed,
20 even half of the Native Village of Eyak's own internal
21 advisory voices opposed it.

22
23 There is already a 29 week deer season
24 with up to five tags available for local qualified
25 users. That is ample opportunity for subsistence
26 harvest. My business operates only six weeks per year
27 with two boats right across two or three large island
28 with multiple bays. I can count on one hand the number
29 of other boats I see out there every season. The
30 suggestion that this small, seasonal operations is out-
31 competing local residents for opportunity across that
32 entire landscape is simply not credible. If this
33 proposal passes it will not even solve the claimed
34 issue. It does not close the beaches, it does not
35 close the private land and does not close the State
36 Parkland. It will simply push those non-Federally-
37 qualified users into the remaining open areas and
38 concentrate users there creating more conflict instead
39 of less.

40
41 There are many common sense tools
42 available before imposing such a broad, drastic full
43 closure. Some ideas are close the eastern portion of
44 Hawkins that is closest to town. Close all of Hawkins
45 if crowding near town is the real concern, but leave
46 Hinchinbrook open. Lower the non-Federally-
47 qualified user bag limit, close doe harvest in
48 December, close the second half of December to non-
49 Federally-qualified users, prohibit shooting from a
50

0219

1 boat, restrict non-Federally-qualified users to buck
2 only harvest. Any of these options would address
3 pressure concerns while preserving fairness, family
4 traditions, local jobs and local food resources.
5 Unfortunately the proposal did not include any broad
6 community engagement prior to being input and these --
7 and we couldn't -- didn't have an opportunity to
8 identify these workable compromises as a community
9 before it was proposed.

10

11 With all this in mind I respectfully
12 ask that the Board reject WP26-15 and instead pursue
13 balanced management solutions routed in science, common
14 sense and the realities of rural life in a community
15 like Cordova.

16

17 Thank you for your time and
18 consideration. I'm happy to answer any questions and
19 will be here for the rest of the day and available on
20 breaks and invite anybody including audience members to
21 come up to me and chat.

22

23 Thank you.

24

25 CHAIRMAN CHRISTIANSON: Thank you.
26 Appreciate that. Rhonda has something.

27

28 MS. PITKA: Yeah, you mentioned three
29 of the ACs that oppose, Valdez, Kodiak and what was the
30 third one?

31

32 MR. JONES: It was the Cordova. So
33 it's the Prince William Sound Copper River AC I think
34 is what that one's called, but it's based in Cordova.
35 And then you've got the Whittier AC and the Valdez AC
36 which are all in Unit 6.

37

38 CHAIRMAN CHRISTIANSON: Frank.

39

40 MR. WOODS: Public Member Frank Woods.
41 Thanks for the testimony, I appreciate we need you at
42 the table. We need industry, we need guided, non-
43 guided, we need fishermen, we need public.

44

45 You mentioned that number 1 that you
46 are -- I'm trying to -- you're a non-guided
47 transporter, or is it a guided and you said there was --
48 number 1, first question, definition of what your
49 operation does. The second you mentioned the number
50

0220

1 sitting in -- affected by this recent -- by this
2 proposal?

3

4 MR. JONES: Yeah, so I operate Serenity
5 Adventures, we are primarily a DIY for big game. I
6 also operate guided fishing and guided sea duck
7 hunting. But for the big game side it is transported,
8 DIY. I do not have a big game registered guide
9 license. I'm an assistant guide, I'm working towards
10 eventually maybe someday I'll be a registered guide,
11 but as of right now I'm not.

12

13 MR. WOODS: No, economically that makes
14 sense especially in the -- on the coastal recent
15 downturn of the seafood market. The red meat hunt
16 we're talking about is under ANILCA, Alaska or it's
17 American National Interest Lands Act or, you know, the
18 rural preference subsistence priority has precedence
19 and there are laws as a State and the Feds, it's
20 allowable on Federal land, they have concessions for
21 guides. Those things are important because number 1 we
22 have run out of places to put people, state of Alaska's
23 run out of land, your operation and operations like
24 yours have been overcrowded and crowding all the
25 different users. At the table and all the seats you
26 sit on you see that conflict looks like. And from now
27 on I'd love to see you at the table to help us sort out
28 the exact issue that you have before you and you're
29 testifying on. So in our -- for me it's a -- it's not
30 just a protein commodity to feed people and like you
31 pointed out it's a cultural -- have you presented this
32 to the tribal council of Cordova?

33

34 MR. JONES: Yes, I wrote them an email,
35 I sent them all Facebook messages, I did not receive a
36 response other than received. And I asked to come and
37 speak with them and work on a compromise. I submitted
38 a proposal to the Board of Game -- well, it wasn't a
39 proposal it was a agenda change request to limit non-
40 residents to two because right now it's four. I felt
41 like that was a pretty good starting point to prove
42 that I'm willing to work towards a compromise.
43 Unfortunately the Board of Game did not adopt it, but I
44 am planning on submitting that as a proposal next
45 cycle. And I do believe that the tribe had, you know,
46 wanted to do something to that effect as well.

47

48 MR. WOODS: So this proposal is
49 submitted by the Native Village of Eyak and the RAC
50

0221

1 approves, supports. Southcentral Alaska Subsistence
2 Regional Advisory Council supports this. Have you
3 testified before them?

4

5 MR. JONES: So I did not unfortunately
6 testify in front of the Southcentral RAC. I -- it was
7 supported with a decision I believe it was six to five
8 so it was pretty split. And had -- there was two
9 members of the RAC that are from Cordova and one of
10 them was not present at the meeting. Had he been there
11 and voted against it it would have failed.
12 Unfortunately it still went forward. I was down south,
13 I didn't -- yeah, I should have been there. I wasn't
14 aware of how to call into it, this is -- I'm pretty new
15 to this process. I've been to a lot of Board of Game
16 and Board of Fish meetings, but this Federal process is
17 a learning curve for me. So I'll definitely be there
18 next time. And I did reach out to, I believe her name
19 is Nissa, and I put my name forward if they wanted to
20 place me on the RAC I am willing to serve and be at the
21 table.

22

23 MR. WOODS: Well, I appreciate your
24 testimony. Thank you for the answers.

25

26 Thank you.

27

28 CHAIRMAN CHRISTIANSON: Any other Board
29 comments.

30

31 (No comments)

32

33 CHAIRMAN CHRISTIANSON: Thank you for
34 your testimony. And we do appreciate, always looking
35 to recruit.....

36

37 MR. JONES: Yeah, thank you.

38

39 CHAIRMAN CHRISTIANSON:RAC
40 members with in depth knowledge so appreciate that as
41 well.

42

43 MR. JONES: Yeah, thank you.

44

45 CHAIRMAN CHRISTIANSON: All right.
46 We'll go ahead and get started with the order of
47 business for the day -- this afternoon and we'll start
48 with WP-26-69, mink and weasel.

49

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0222

1 Tom has it, he's already there.

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MR. PLANK: Thank you, Mr. Chair, members of the Board. Again for the record my name's Tom Plank and I'm a Wildlife Biologist with OSM. And I will be presenting a summary of the analysis for Wildlife Proposal WP26-69 starting on page 1307 in your books.

Wildlife Proposal WP26-69 was submitted by the Northwest Arctic Council and it requests to extend the trapping season for mink and weasel to close April 15th in Unit 23. Proponent states that aligning the Federal season to match the State season will help reduce confusion and increase opportunity. Trappers have indicated increased mink and weasel populations in Unit 23. Federal subsistence regulations for mink and weasel in Unit 23 have not changed since 1990 when the Federal management of subsistence fish and wildlife resources on Federal public lands began and at that time the current regulation was adopted from the State regulation. In 2003 the Board of Game extended the trapping season for mink and weasel in Unit 23 to close April 15th.

Population dynamics of mink and weasel in Unit 23 are not well documented. Mink occur throughout Unit 23, but little is known about their abundance or population trend. Mink numbers fluctuate locally making it difficult to monitor their population trends. Snow in spruce forests in the upper Kobuk drainage are generally suitable for mink while the hardpacked snow conditions in the remainder of Unit 23 may limit the distribution of mink. And from 2013, '14 season to 2023, '24 season, according to the voluntary trapping question -- trapper questionnaires, mink was reported as common with no change in population trends in region 5 which also includes units 18, 22, 23 and 26A.

There are two species of weasels that can be found in forested, brushy and open country in Alaska, however weasels are not included in the most recent ADF&G fur bearer management report for Unit 23 or indicated to occur there. And according to voluntary trapper reports ermine were reported as common with no change in population trend in unit -- in region 5.

1 The harvest of mink and weasel is not
2 well documented for Unit 23. Sealing is not required
3 in Unit 23 and the only harvest information available
4 is from the voluntary trapping questionnaires and there
5 were no responses to the questionnaires for Unit 23 in
6 recent years.

7
8 One alternative considered was to
9 exclude Cape Krusenstern National Monument and Kobuk
10 Valley National Park for the season extension. These
11 areas are closed to anyone hunting or trapping under
12 State regulations. Excluding these areas from the
13 season extension could provide refugia and would
14 represent a conservative approach to the status of Unit
15 23 mink and weasel population. And their harvest is
16 essentially unknown. These areas appear to contain
17 excellent habitat for mink and weasels and this
18 alternative would result in Federal regulations
19 remaining more restrictive than State regulations.

20
21 If this proposal is adopted the mink
22 and weasel trapping season in Unit 23 would be extended
23 until April 15th. This would increase opportunity for
24 Federally-qualified subsistence users under Federal
25 regulations although units may already trap on most
26 Federal lands until April 15th under State regulations.
27 However this proposal would allow users to trap until
28 April 15 in Cape Krusenstern National Monument and
29 Kobuk Valley National Park which are closed to anyone
30 trapping under State regulations. No impact to the
31 mink or weasel populations are expected as users can
32 already trap until April 15th on most Federal land in
33 Unit 23 under State regulations. And while
34 undocumented harvest pressure on mink and weasel
35 populations throughout Unit 23 is also likely low.
36 Adopting this proposal would also decrease regularity
37 complexity and confusion by aligning State and Federal
38 regulations.

39
40 OSM's conclusion was to support
41 proposal WP26-69 with modification to exclude Cape
42 Krusenstern National Monument and Kobuk Valley National
43 Park. This proposal increases opportunity for
44 Federally-qualified subsistence users and there are no
45 conservation concerns as users are already able to trap
46 until April 15th on most Federal public lands in Unit
47 23 under State regulations. State regulations do not
48 apply to National Parklands including Cape Krusenstern
49 National Monument and Kobuk Valley National Park in
50

0224

1 Unit 23. Excluding National Park Service managed lands
2 would retain the current Federal regulations as a
3 conservative approach to provide refugia to Unit 23
4 mink and weasel populations as their population status
5 and harvest is unknown.

6
7 Thank you, Mr. Chair, members of Board.
8 I'd be happy to answer any questions.

9
10 CHAIRMAN CHRISTIANSON: Thank you, Tom.
11 Any questions from the Board for Tom.

12
13 (No comments)

14
15 CHAIRMAN CHRISTIANSON: Thank you for
16 the presentation. Any summary of written public
17 comment.

18
19 MR. PLANK: Thank you, Mr. Chair. Tom
20 Plank, OSM. There were no written comments submitted
21 during the open period.

22
23 Thank you.

24
25 CHAIRMAN CHRISTIANSON: Thank you, Tom.
26 Summary of tribal government and Alaska Native
27 corporation.

28
29 MR. LIND: Mr. Chair, Board members,
30 Orville Lind, Native Liaison, OSM. There were no
31 written comments or resolutions.

32
33 Thank you, Mr. Chair.

34
35 CHAIRMAN CHRISTIANSON: Thank you,
36 Orville. Tribal, Alaska Native organization testimony
37 here or online.

38
39 (No comments)

40
41 CHAIRMAN CHRISTIANSON: Hearing or
42 seeing none, Advisory Group testimony, comments from
43 the SRC, State Advisory or multiagency work groups.

44
45 MR. REAKOFF: Jack Reakoff, Vice Chair
46 of the Gates of the Arctic Subsistence Resource
47 Commission. We visited this proposal and we supported
48 the proposal as written at our April 15 and 16 meeting
49 in Fairbanks last week.

50

0225

1 Thank you, Mr. Chair.

2

3 CHAIRMAN CHRISTIANSON: Thank you,
4 Jack.

5

6 MS. LAVINE: Thank you, Mr. Chair. The
7 Kobuk Valley Subsistence Resource Commission supports
8 this proposal as written.

9

10 And then I have the comments by the
11 Cape Krusenstern National Monument SRC. They say
12 there's no conservation concern associated with this
13 proposal, it would have only a negligible impact on
14 actual harvest, but would in fact provide an expanded
15 opportunity for subsistence harvest of muskrats for
16 food especially by those people living in their remote
17 camps and CAKR adjacent to muskrat habitat. Muskrats
18 are harvested for food in the summertime. The harvest
19 of juvenile muskrats would be of no conservation
20 concern as the expected level of harvest under the
21 extended season time period. They are completely or
22 practically wiped out from time to time through extreme
23 freezing in the waterbodies on -- in conjunction with
24 the vagaries of population dynamics and habitat quality
25 in Cape Krusenstern.

26

27 The actual refugia for muskrats is the
28 Noatak River and Noatak Flats and the Kobuk River
29 through muskrats find their way back into Cape
30 Krusenstern during flood outs or break up time. We do
31 agree with OSM that supporting this proposal unmodified
32 may contribute to food security which we believe it
33 will do. It is known by the Cape Krusenstern SRC that
34 subsistence users do harvest muskrats in the summertime
35 for food.

36

37 The Cape Krusenstern SRC supports
38 Wildlife Proposal 26-27 [sic] as submitted. No closed
39 season.

40

41 Thank you, Mr. Chair.

42

43 CHAIRMAN CHRISTIANSON: Yeah, we're on
44 weasel and mink and that was muskrat as pointed out by
45 Rhonda.

46

47 So thank you.

48

49 MS. PITKA: I was very confused and I

50

0226

1 needed clarification on which one was the food source,
2 the mink or the weasel.

3

4 (Laughter)

5

6 CHAIRMAN CHRISTIANSON: I think that's
7 one we haven't picked up a diet for yet. And if you
8 have eaten one in the room we're sorry.

9

10 (Laughter)

11

12 CHAIRMAN CHRISTIANSON: Any other
13 testimony from the ARCs.

14

15 MS. PATTON: Mr. Chair.....

16

17 CHAIRMAN CHRISTIANSON: Yes, Eva.

18

19 MS. PATTON:and members of the
20 Board. For the record Eva Patton, Subsistence Program
21 Manager with the National Park Service Regional Office.
22 If I may, Robbin had suggested I could read the SRC
23 comment. On behalf of the SRC and also make a point of
24 clarification to both for WP26-66 and for this proposal
25 as well on the SRC's recommendation.

26

27 Thank you, Mr. Chair and members of the
28 Board. I do want to start with just clarifying the
29 SRC's recommendation on the OSM modification. That
30 that modification originated from the National Park
31 Service at the request of the National Park Service
32 biologist for Cape Krusenstern and Kobuk Valley. Early
33 in the analysis process in the team field review stage
34 due to the events in the past year with the closure of --
35 government shutdown, the SRC was unable to meet at
36 their regularly scheduled meeting which must be
37 publicly noticed. And so they did not have an
38 opportunity to both meet and make a formal
39 recommendation on this proposal both to inform the Park
40 Service and to inform the Regional Advisory Council and
41 only recently had an opportunity to meet at their
42 spring publicly noticed meeting. And so that's why
43 these comments are coming before the Board now and they
44 were not able to make the recommendations earlier. But
45 the modifications did originate from Park Service
46 biologist's request and are now informed by the SRC's
47 recommendation.

48

49 And so the SRC supports 26-69.

50

0227

1 Similarly they are saying that the Cape Krusenstern is
2 at the edge of the habitat for the mink population and
3 most of it is an ecological sink for mink because of
4 the freeze out of habitat in some years mink travel
5 overland and follow stream courses from their
6 population -- because of the freeze out of habitat in
7 some years mink travel overland and follow stream
8 courses from their population core in the Noatak River
9 Valley and spread out over the Cape Krusenstern
10 habitat. Assessments of mink habitat by professional
11 biologists have not
12 been done in the wintertime in this area which is a
13 limiting season for long term occupation of mink. The
14 Cape Krusenstern does not serve as a refugia for mink
15 so there's no purpose served in excluding this region
16 from the proposed regulation.

17
18 And both these Parks were established
19 to ensure the continuation of subsistence uses and so
20 that's one of the top priorities of these Park systems.
21 And the SRCs were created to advise the Park with their
22 local and traditional knowledge. They were created
23 under Title .808 of ANILCA to advise the Park with
24 their local and traditional knowledge on hunting and
25 other subsistence uses within the Park.

26
27 There is no conservation concern for
28 weasels either in this area. While Cape Krusenstern
29 may support long term presence of weasel population
30 there is no realistic future scenario under which the
31 presence of weasel in this area would serve as a
32 refugia. If environmental conditions were such that
33 weasels in the Noatak River Valley were at such a low
34 level as to require contributions from adjacent
35 populations, they would already be reduced by whatever
36 was depressing in the Noatak River Valley area.

37
38 So the CAKR SRC supports WP26-69 with
39 the trapping season November 1 through April 15 with no
40 exclusion for Cape Krusenstern National Monument.

41
42 And again they appreciate this
43 opportunity to bring their comments to the Board at
44 this time.

45
46 Thank you.

47
48 CHAIRMAN CHRISTIANSON: Thank you, Eva.
49 Any questions.

50

0228

1 (No comments)

2

3 CHAIRMAN CHRISTIANSON: Hearing and
4 seeing none we'll move on to public testimony here or
5 online.

6

7 (No comments)

8

9 CHAIRMAN CHRISTIANSON: Hearing or
10 seeing none, Council recommendations.

11

12 MS. PILCHER: Good afternoon. For the
13 record my name's Nissa Pilcher, Council Coordinator for
14 Northwest Arctic. The Council voted to unanimously
15 support WP26-69 as written. The Council does not
16 believe that this regulatory change will cause any
17 biological concern, but will increase subsistence
18 opportunities as well as align State and Federal
19 regulations both of which are beneficial to subsistence
20 users.

21

22 Thank you.

23

24 CHAIRMAN CHRISTIANSON: Thank you. Any
25 questions.

26

27 (No comments)

28

29 CHAIRMAN CHRISTIANSON: Hearing and
30 seeing none, thank you. We'll call on the next RAC.

31

32 MS. CHAPA: Good afternoon. Gisela
33 Chapa for the record, Council Coordinator for North
34 Slope RAC. And the Council supported WP26-69 as
35 modified by OSM and indicated the proposal would align
36 State and Federal regulations to provide more
37 subsistence opportunities to Unit 23 residents.

38

39 CHAIRMAN CHRISTIANSON: Thank you. Any
40 questions.

41

42 (No comments)

43

44 CHAIRMAN CHRISTIANSON: Hearing and
45 seeing no comments we'll move on to Alaska Department
46 of Fish and Game.

47

48 MR. MULLIGAN: Thank you, Mr. Chair.
49 For the record the Alaska Department of Fish and Game

50

0229

1 supports the proposal as written and similar to the
2 proposal we heard before lunch we did support the OSM
3 modification. Just looking at the landscape and
4 wanting to get as much alignment into the Federal
5 regulations as possible, but given what we're hearing
6 from the SRC and if it is the will of the body we would
7 support you making that alignment into those areas in
8 what we -- well, I grew up calling the Hard Park.

9

10 Thank you.

11

12 CHAIRMAN CHRISTIANSON: Thanks. No
13 questions for the State. We'll move on to InterAgency
14 Staff Committee comments.

15

16 MS. LAVINE: Thank you, Mr. Chair. The
17 InterAgency Staff Committee provided the standard
18 comment.

19

20 CHAIRMAN CHRISTIANSON: Thank you.
21 Board discussion with their Liaisons, Council Chairs,
22 State rep. If you have a question or clarification
23 this is your opportunity to reach out.

24

25 (No comments)

26

27 CHAIRMAN CHRISTIANSON: Hearing and
28 seeing none we'll move to Board action. The floor's
29 open for a motion.

30

31 MR. STRIKER: Mr. Chair, Don Striker,
32 National Park Service. National Park Service moves to
33 adopt proposal WP26-69 as written. And if I get a
34 second I'll explain why I intend to vote in support of
35 my motion.

36

37 MS. PITKA: Public Member Rhonda Pitka
38 seconds.

39

40 MR. STRIKER: Thank you. I would like
41 to start by reading into the record that as was the
42 case in the previous matter with 26-66 Eva clarified
43 that due to time constraints the RACs when they met
44 didn't have time to listen to the advice of the SRCs on
45 topic and that becomes sort of important in the
46 sequencing of how this all happened. So even though
47 the original modifications from OSM were started by our
48 organization they were wisely subsequently overturned I
49 think and that's the evidence that we have in front of
50

0230

1 us. This proposal increases the opportunity for
2 Federally-qualified subsistence users and there are no
3 conservation concerns as users are already able to trap
4 until April 15 on most Federal public lands in Unit 23
5 under State regulations. Additionally Federal and
6 State regulations for mink and weasel trapping in Unit
7 23 would be aligned, reducing regulatory complexity.

8
9 As the SRC comments highlight one of
10 the primary purposes for the creation of Cape
11 Krusenstern National Monument and Kobuk Valley National
12 Park is to ensure the continuation of a subsistence way
13 of life for Federally-qualified subsistence communities
14 and to support the thriving Inupiaq culture that has
15 existed here for thousands of years. This proposal
16 would do that. There are no conservation concerns with
17 implementing this proposal as the SRC notes and it will
18 not likely result in big changes to current harvest and
19 will be allowed on all other Federal lands in Unit 23.
20 What it will do is align State and Federal regulations.
21 And again as noted with the previous proposal as is the
22 case with many of the units of the National Park
23 Service created under ANILCA there's a priority mandate
24 in these places to provide for the continuation of
25 subsistence uses. The SRCs were created under .808 of
26 ANILCA, a slightly different authority than we often
27 reference that we might want to teach the youth about,
28 to advise Parks and Monuments on subsistence management
29 of these lands and the National Park Service seeks
30 guidance from local and traditional knowledge of the
31 SRCs and their expertise based on generations of lived
32 experience on these Parklands. And again due to the
33 events of the past year the SRC didn't have the
34 opportunity to make the formal regulations. Taking
35 action today in consideration of these SRC
36 recommendations I think will rectify the situation and
37 is still in deference to the Northwest Arctic RAC
38 recommendations to support as written as well.

39
40 So thank you, Mr. Chair.

41
42 CHAIRMAN CHRISTIANSON: Thank you.
43 Floor is open for Board discussion, deliberation.

44
45 (No comments)

46
47 CHAIRMAN CHRISTIANSON: Hearing and
48 seeing none, roll call. Read into the record please
49 the motion.
50

0231

1 MS. LEONETTI: Okay. The motion is to
2 adopt wp26-69 as written. So I will start with NPS,
3 Don Striker.

4
5 MR. STRIKER: Thank you. I support.

6
7 MS. LEONETTI: And Forest Service
8 Member Ingersoll.

9
10 MR. INGERSOLL: Forest Service supports
11 in deference to the RAC the Subsistence Resource
12 Committees and our colleagues in the Park Service.

13
14 MS. LEONETTI: Public Member Pitka.

15
16 MS. PITKA: I support in deference to
17 the Regional -- the Northwest Arctic Regional Advisory
18 Council and as justified by the National Park Service.

19
20 Thank you.

21
22 MS. LEONETTI: Public Member Woods.

23
24 MR. WOODS: Public Member Woods
25 supports with the recommendation of the RAC and -- yes.

26
27 MS. LEONETTI: Fish and Wildlife
28 Service Member Boario.

29
30 MS. BOARIO: Fish and Wildlife Service
31 supports in deference to the RAC and for the reasons
32 provided by the National Park Service.

33
34 MS. LEONETTI: Public Member Payenna.

35
36 MR. PAYENNA: I also support based on
37 previous comments.

38
39 MS. LEONETTI: BLM Member Pendergast.

40
41 MR. PENDERGAST: BLM supports for the
42 reasons stated by the Park Service.

43
44 MS. LEONETTI: BIA Member John.

45
46 MS. JOHN: BIA votes to adopt the
47 proposal as recommended by the National Park Service in
48 concurrence with the Northwest Arctic RAC as well.

49
50

0232

1 MS. LEONETTI: Public Member Oney.

2

3 MR. ONEY: Public Member Ray Oney move
4 to support.

5

6 MS. LEONETTI: And Chair Christianson.

7

8 CHAIRMAN CHRISTIANSON: I support the
9 proposal as stated by everybody here at the table.

10

11 MS. LEONETTI: Mr. Chair, the motion to
12 adopt WP26-69 as written carries.

13

14 Thank you. And we'll move right into
15 WCR26-18, Unit 23 sheep. That's you, Tom.

16

17 MR. PLANK: Thank you again, Mr. Chair,
18 members of the Board. For the record Tom Plank, OSM.
19 And wildlife closure review WCR26-18 is for the closure
20 to sheep hunting by non-Federally-qualified users in
21 the Baird Mountains of Unit 23 south of Rabbit Creek,
22 Kiyak Creek and the Noatak River and west of the Cutler
23 and Redstone Rivers. And this starts on page 1315 of
24 your books.

25

26 There have been many changes to the
27 sheep hunt over the years however the original closure
28 that we are reviewing was put in place in 1999. No
29 sheep harvest has occurred in the Baird Mountains under
30 Federal or State regulations since 2014 when the
31 seasons were closed due to conservation concerns.
32 Between 2011 and 2019 the sheep population estimates
33 ranged from 174 to 643 sheep, the highest in 2011 and
34 the lowest estimate occurred in 2019. But the
35 preliminary numbers indicate that the population showed
36 a slight increase from the 2019 survey and a recent
37 survey -- excuse me. A recent survey in 2024 indicated
38 the population increased, but the 2025 survey observed
39 a decrease back below the 2019 low estimate.

40

41 Next slide. For reference sheep
42 populations in the DeLong and Schwatka Mountains are
43 similarly low, but there are no Federal land closures
44 because State hunts are closed and the Western Arctic
45 National Parkland Superintendent has authority to close
46 Federal lands to non-Federally-qualified users if
47 necessary in all this hunt areas. While the Baird
48 Mountain sheep population is still very low and cannot
49 withstand any harvest, the State sheep hunt in Unit 23

50

0233

1 has been closed since 2014. If a harvestable surplus
2 does become available and a season is announced the
3 Western Arctic National Parkland Superintendent has
4 authority to close Federal lands to non-Federally-
5 qualified users if necessary so that Federally-
6 qualified subsistence users will be assured a limited,
7 but meaningful hunting opportunity and subsistence
8 priority.

9
10 Therefore the OSM's conclusion is to
11 rescind this closure because rescinding the closure
12 would have no impact on the sheep population or
13 subsistence users, but would reduce the regulatory
14 administrative burdens associated with closures. Now
15 while the Western Arctic National Parklands
16 Superintendent may lose the authority to close Federal
17 public lands in Unit 23 to non-subsistence uses of
18 sheep if deferred WP26-01 is adopted later, OSM still
19 maintains that retaining the closure in regulation is
20 unnecessary since the State hunt has been closed since
21 2014. If a State hunt does open in the future the
22 Board could administratively delegate temporary
23 authority to close Federal public lands to non-
24 Federally-qualified users to the Western Arctic
25 National Parklands Superintendent and if necessary a
26 temporary or emergency special action could also be
27 submitted.

28
29 Thank you, Mr. Chair, members of the
30 Board. I'd be happy to answer any questions.

31
32 CHAIRMAN CHRISTIANSON: Thank you, Tom,
33 any questions from the Board or Staff.

34
35 (No comments)

36
37 CHAIRMAN CHRISTIANSON: Hearing and
38 seeing none, summary of written public comment.

39
40 MR. PLANK: Thank you, Mr. Chair, Tom
41 Plank, OSM. There were no written comments submitted
42 during the open period.

43
44 Thank you.

45
46 CHAIRMAN CHRISTIANSON: Thank you.
47 We'll move on to summary of tribal government and
48 Alaska Native corporation consultation.

49
50

0234

1 MR. LIND: Thank you, Mr. Chair.
2 Orville Lind, Native Liaison. There were no comments
3 or resolutions for this proposal.

4
5 Thank you, Mr. Chair.

6
7 CHAIRMAN CHRISTIANSON: Thank you,
8 Orville. Tribal, Alaska Native organization testimony.

9
10 (No comments)

11
12 CHAIRMAN CHRISTIANSON: Hearing and
13 seeing none, Advisory Group testimony, SRC, State
14 Advisory or multiagency working group.

15
16 MS. LAVINE: Thank you, Mr. Chair. The
17 Kobuk Valley Subsistence Resource Commission supports
18 retaining the closure.

19
20 Thank you, Mr. Closure.

21
22 CHAIRMAN CHRISTIANSON: Thank you. Any
23 public testimony here in the room or online? Online
24 please raise your hand.

25
26 (No comments)

27
28 CHAIRMAN CHRISTIANSON: Hearing and
29 seeing none, Council recommendations.

30
31 MS. PILCHER: Afternoon again. For the
32 record Nissa Pilcher, Council Coordinator for the
33 Northwest Arctic Regional Advisory Council. The
34 Council voted unanimously to retain the status quo of
35 WCR26-18. The Council believes that maintaining the
36 closure to protect this subsistence resource is in the
37 best interest of the region at this time as there are
38 substantial conservation concerns for sheep.

39
40 Thank you.

41
42 CHAIRMAN CHRISTIANSON: Thank you, any
43 questions.

44
45 (No comments)

46
47 CHAIRMAN CHRISTIANSON: Hearing none,
48 next RAC. Oh, Robbin.

49
50

0235

1 MS. LAVINE: Thank you, Mr. Chair.
2 Cape Krusenstern SRC supports retaining the status --
3 retaining the closure for WCR26-18.

4
5 Thank you.

6
7 CHAIRMAN CHRISTIANSON: Thank you.
8 North Slope.

9
10 MS. CHAPA: Gisela Chapa for the
11 record, Council Coordinator for North Slope RAC. The
12 Council voted to retain the status quo for WCR26-18 and
13 stated that the closure is necessary for the
14 conservation of the sheep population. Additionally the
15 Council stated that rescinding the closure could reduce
16 hunting opportunities for Federally-qualified
17 subsistence users and promote competition for harvest
18 with non-Federally-qualified users.

19
20 CHAIRMAN CHRISTIANSON: Thank you.
21 Alaska Department of Fish and Game.

22
23 MR. MULLIGAN: Thank you, Mr. Chair.
24 For the record the Alaska Department of Fish and Game
25 supports rescinding the closure similar to what you
26 heard from Mr. Plank. We've had -- I mean, past cycle
27 and maintaining this position to this cycle is -- we
28 believe that the WANP Superintendent has the ability to
29 utilize their delegation -- their delegation of
30 authority and basically utilize adaptive management so
31 if and when the ability to provide for -- I mean, since
32 we already had it closed for Federally-qualified users
33 he could do -- he or she could do so at that time
34 without having to either wait the four years for the
35 closure review to come up or to go through the
36 administrative process of a special action.

37
38 Thank you, Mr. Chair.

39
40 CHAIRMAN CHRISTIANSON: Thank you, Ben.
41 Frank.

42
43 MR. WOODS: A question, Mr. Mulligan.
44 Last year or year before when me and John, a local
45 biologist attended Board of Game, there was a bunch of
46 sheep proposals in that process. Has any of those
47 proposals related to the State land, looks like it's
48 all Federal land except for small pockets of -- is it
49 GARV (ph), no that's -- I'm looking at a map on the
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0236

1 proposal. Can you.....

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MR. MULLIGAN: So you're ask -- sorry. Through the Chair. You're asking any Board of Game proposals that had to do with this area given the little pieces of State and private land that you're seeing on the map?

MR. WOODS: Yeah. Yes.

MR. MULLIGAN: No. So the last time Western or North Slope, Northwestern Alaska came up had been 2024 in Kotzebue and it is coming up again and we won't know what proposals will be in front of the Board until that process closes out May 1st. The State isn't going to propose anything. Like Mr. Plank said we've had this area closed since 2014 and at the last check in with Staff we see no reason to open it because again the pop -- at least our ability. Now like you said it's primarily Federal land so impact on a measure of impact it would be more on the Federal side than on the State side as the ability to hunt. So I guess the short answer is no, sir, there hasn't been proposals to open this back up in 2024 and we don't anticipate seeing those again at the January, '27 meeting as well.

MR. WOODS: Oh, thank you, Mr. Mulligan.

CHAIRMAN CHRISTIANSON: Jerry.

MR. INGERSOLL: Jerry Ingersoll, Forest Service. Through the Chair. This question may be both for you and OSM. So when nobody has any proposals to hunt because of a conservation concern I guess I'm curious as to why we would -- why the recommendations would be rescind the closure if nobody believes that a hunt is appropriate? And I'm interested in both of your perspectives on that.

MR. PLANK: Thank you. Tom Plank, OSM, through the Chair. From our side of it is just there's no anticipation of a hunt to be opened there and since the Park Service has the ability to close it to non-Federally if a hunt does open up. This is basically it's a -- more of an administrative burden at this point because we're just reviewing it and there's no -- there's no anticipation of a hunt coming up that would require this at this point. I don't know if that

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1 answers it or makes it more convoluted, but.....

2

3 MR. INGERSOLL: No, it does, it's just
4 -- there's a sense in which it wouldn't be aligning
5 State and Federal if we retain a State closure, but
6 lift the Fed -- anyway, yeah. No, I think I
7 understand.

8

9 MR. MULLIGAN: Through the Chair,
10 Member Ingersoll. As Member Woods pointed out and Mr.
11 Plank has also pointed out this is basically Federal
12 public land, there's very little land that we could
13 impact. We took our position the way we did is because
14 we operate as you well know under an adaptive
15 management strategy. We empower our area biologists to
16 use, you know, the information they have out in the
17 field and in the communities in which they live. As
18 you know we do have our folks spread across the state
19 and so they have the ability to make those decisions
20 instead of having it here necessarily at a regulatory
21 meeting they're reading on the ground numbers that
22 they're seeing in their surveys plus what they're
23 hearing from locals as they visit the offices they
24 visit them.

25

26 CHAIRMAN CHRISTIANSON: Tom.....

27

28 MS. BOARIO: Mr. Chair.

29

30 CHAIRMAN CHRISTIANSON:go ahead.
31 And then down here.

32

33 MR. PLANK: Thank you, Mr. Chair. I
34 also wanted to allow the wildlife managers to help add
35 to my explanation to you. I think she'd be more
36 thorough on it than I could, she's better with the
37 words.

38

39 CHAIRMAN CHRISTIANSON: Go ahead, Lisa.

40

41 MS. GREDIAGIN: Thank you. Lisa
42 Grediagin for the record. And another -- one of the
43 reasons that Tom stated that OSM supported continuing
44 the closure is because ADF&G hasn't had a hunt on the
45 books since 2015. I mean, this hunt has been closed
46 under State and Federal regulation since 2014, 2015.
47 And there's three hunt areas in Unit 23. And this is
48 the only hunt area that has a closure and it's just
49 pretty much, you know, similar sheep populations where
50

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1 they're all drastic decline. And so there's no
2 question that there is severe conservation concerns for
3 these sheep populations, but the other two hunt areas
4 are a may be announced season with no Federal closure.
5 And so OSM was like we -- let's make in consistent, you
6 know, have all three areas be consistent, managed the
7 same way, may be announced season and the don't need a
8 closure because the State hunt's been closed for 10
9 years. And the in-season manager has delegated
10 authority to close to non-Federally-qualified users if
11 a State hunt is ever opened which, I mean, we'd
12 probably have a lot of notice because a proposal would
13 be submitted and the Board of Game would have to adopt
14 it.

15

16 So I just wanted to add that, but we
17 certainly respect the Council's concern, you know, for
18 conservation and like Tom said it's a little bit of
19 just decreasing administrative burden and keeping it
20 consistent across hunt areas.

21

22 Thank you.

23

24 CHAIRMAN CHRISTIANSON: Sara.

25

26 MS. BOARIO: Thank you, Mr. Chair.
27 Fish and Wildlife Service. Could the two of you speak
28 a little more for, I mean, our understanding when you
29 say administrative burden what specifically you mean?

30

31 MS. GREDIAGIN: Yeah, Lisa Grediagin.
32 These closures are reviewed every four years and so
33 every four years we have to do this analysis, take it
34 to the Councils, you know, have meetings on it, spend
35 half an hour at Board meetings, you know, reviewing
36 these closures when again these two other hunt areas
37 are in the exact same situation and don't have
38 closures, that we're not spending this time reviewing
39 them every four years. And so that's primarily what we
40 mean by administrative burden.

41

42 MS. BOARIO: That's helpful. Thank
43 you, Lisa.

44

45 CHAIRMAN CHRISTIANSON: I think we
46 talked that one up and down. All right. Forgot where
47 I was on the list now. ISC Committee comments.

48

49 MS. LAVINE: Thank you, Mr. Chair. The

50

1 Federal Subsistence Board will need to consider a few
2 key sections of ANILCA before taking action on
3 proposals requesting closures and closure reviews.
4 Specifically those sections of Title VIII pertaining to
5 Council deference and the limitations to closures or
6 restrictions of subsistence and non-subsistence uses on
7 Federal public lands. ANILCA section .815(3) clarifies
8 that nothing in this title shall be construed as
9 authorizing a restriction on the taking of fish and
10 wildlife for non-subsistence uses on public lands
11 unless necessary for the conservation of healthy
12 populations of fish and wildlife. For the reasons set
13 forth in .816 to continue subsistence uses of such
14 populations or pursuant to other applicable law. And
15 ANILCA section .816 allows for closure or restriction
16 of Federal public lands to subsistence uses of fish and
17 wildlife for reasons of public safety, administration
18 or to ensure the continued viability of a particular
19 fish or wildlife population. Finally ANILCA section
20 .805(c), the Board must consider the recommendations of
21 the Councils concerning the taking of fish and wildlife
22 on public lands in their regions and may choose not to
23 follow such recommendation only if it not supported by
24 substantial evidence, violates recognized principles of
25 fish and wildlife conservation or would be detrimental
26 to the satisfaction of subsistence needs.

27
28 These three sections speak to the heart
29 of Board authority and require a careful balance
30 between the Federal priority, the continuation of
31 subsistence uses and the necessary conservation of
32 subsistence fish and wildlife and unnecessary
33 restrictions. In the case of WCR26-18 there's
34 currently no open State season for sheep in the Baird
35 Mountains and no harvest has taken place under the
36 State or Federal regulations since 2014. Regardless
37 extreme conservation concerns persist. The ISC
38 suggests that the Councils' recommendation to retain
39 the closure to the harvest of sheep by non-Federally-
40 qualified users in Unit 23 may meet the criteria for
41 deference.

42
43 Thank you, Mr. Chair.

44
45 CHAIRMAN CHRISTIANSON: Thank you. Any
46 questions for ISC.

47
48 (No comments)

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1 CHAIRMAN CHRISTIANSON: Hearing and
2 seeing none we'll move on to Board discussion with
3 their Liaison, Council Chairs, state rep.

4
5 (No comments)

6
7 CHAIRMAN CHRISTIANSON: Hearing and
8 seeing none we'll open up this floor for Board Action.

9
10 MR. STRIKER: Mr. Chair, the National
11 Park Service moves to retain the closure for 26-18 or
12 to I guess maintain the status quo for 26-18. If I
13 receive a second I'll explain my reasoning.

14
15 MR. WOODS: Second that motion.

16
17 MR. STRIKER: Thank you. National Park
18 Service votes to maintain the status quo for WCR-26-18
19 in deference to the Northwest Arctic and North Slope's
20 Subsistence Regional Advisory Councils. As noted in
21 the OSM conclusion the Baird Mountain sheep population
22 is very low and cannot withstand any harvest. The
23 State sheep hunt in Unit 23 has been closed since 2014.
24 The Federal subsistence sheep hunt in this area is a
25 may be announced season and has also not been open to
26 any subsistence harvest for over a decade. There
27 exists a clear population viability concern that
28 warrants maintaining this closure. Both the Arctic and
29 the North Slope Subsistence Regional Advisory Councils
30 voted to retain the status quo due to substantial
31 conservation concerns for sheep. Over the years of
32 this closure review process both Councils have also
33 spoken in support of not opening a subsistence hunt in
34 this area as they believe it is necessary for the
35 conservation of this sheep population. And finally
36 I'll note that per .805(c) of ANILCA there is nothing I
37 can find that would justify the Board going against the
38 RAC recommendation in this case.

39
40 Thank you, Mr. Chair.

41
42 CHAIRMAN CHRISTIANSON: Thank you, Don.
43 The floor is now open for deliberation, discussion.

44
45 Frank.

46
47 MR. WOODS: Board Member -- public
48 Board Member Woods. I'd like to conclude if the Park
49 Service status quo is pretty apparent for the
50

0241

1 conservation concern and consistency with ANILCA's
2 preservation for subsistence resource.

3

4 Thank you.

5

6 CHAIRMAN CHRISTIANSON: Thank you.
7 Hearing and seeing no more deliberation, we'll do roll
8 call. Read into the record please the motion.

9

10 MS. LEONETTI: Okay. The motion is to
11 retain status quo on WCR26-18. Start with Park Service
12 Member Striker.

13

14 MR. STRIKER: Support.

15

16 MS. LEONETTI: BLM Member Pendergast.

17

18 MR. PENDERGAST: BLM will support.

19

20 MS. LEONETTI: Public Member Payenna.

21

22 MR. PAYENNA: Yeah, I vote to support.

23

24 MS. LEONETTI: Public Member Woods.

25

26 MR. WOODS: Yes.

27

28 MS. LEONETTI: Public Member Oney.

29

30 MR. ONEY: Public Member Ray Oney moves
31 to support.

32

33 MS. LEONETTI: BIA Member John.

34

35 MS. JOHN: BIA votes to support as
36 recommended and justified by the RAC and eloquently
37 stated by the National Park Service.

38

39 MS. LEONETTI: Fish and Wildlife
40 Service Member Boario.

41

42 MS. BOARIO: Fish and Wildlife Service
43 supports and reports that we support.

44

45 MS. LEONETTI: Public Member Pitka.

46

47 MS. PITKA: I vote to retain the status
48 quo in deference to the Northwest Arctic Subsistence
49 Regional Advisory Council and the North Slope
50

0242

1 Subsistence Regional Advisory Council and in
2 recognition of the extreme conservation concerns.

3

4 Thank you.

5

6 MS. LEONETTI: Forest Service Member
7 Ingersoll.

8

9 MR. INGERSOLL: Forest Service supports
10 in deference to the RAC, the SRCs and our colleagues in
11 the Park Service. I think this is a clear case where
12 the RACs' recommendation is entitled to deference.

13

14 Thank you.

15

16 MS. LEONETTI: Chair Christianson.

17

18 CHAIRMAN CHRISTIANSON: I support as
19 stated.

20

21 MS. LEONETTI: Okay. The motion to
22 retain the status quo on WCR26-18 carries unanimously.

23

24 CHAIRMAN CHRISTIANSON: Next we have
25 WCR26-45, Unit 23 caribou.

26

27 DR. VOORHEES: Good afternoon, Mr.
28 Chair and members of the Board. This is Hannah
29 Voorhees, I'm an Anthropologist with OSM. And I want
30 to thank you for hearing my presentation even though
31 I'm unable to be there in person with you today. I
32 will be presenting closure review WCR26-45 which begins
33 on page 1341 of your Board book.

34

35 And I just want to pause and make sure
36 you can hear me okay in the room.

37

38 MS. LEONETTI: Yes, we can.

39

40 DR. VOORHEES: Thank you. Wildlife
41 closure review WCR26-45 is a standard review of a
42 Federal subsistence wildlife closure to the harvest of
43 caribou by non-Federally-qualified users on Federal
44 public lands within a portion of Unit 23 remainder.
45 This is a year round closure. The closure is located
46 along the Noatak River, I'll give the technical
47 description here. It's along the Noatak River from the
48 western boundary of Noatak National Preserve, upstream
49 to the confluence with the Cutler River within the
50

1 northern and southern boundaries of the Eli and
2 Agashashok River drainages respectively and within the
3 Squirrel River drainage. In the rest of my
4 presentation I'll refer to this as the Noatak corridor
5 closure.

6
7 This closure was first put in place in
8 2017 as a special action which was submitted by the
9 Northwest Arctic Council and it was codified in
10 regulation in 2018. The closure was enacted to ensure
11 continuation of the subsistence use in the context of
12 wide user conflict around the Noatak corridor. And it
13 also reflected early declines in the Western Arctic
14 Caribou Herd population. It was last reviewed in 2022
15 when it was maintained. At the time the Board stated
16 that the closure was originally enacted for the
17 continuation of subsistence uses of the Western Arctic
18 Caribou Herd and that the underlying factors leading to
19 the closure including user conflict were still a
20 concern.

21
22 In biological background the Western
23 Arctic Caribou Herd population has fluctuated over time
24 from a low of 75,000 in the 1970s to a peak of
25 approximately 490,000 in 2003. The most recent
26 population estimate is 121,000 caribou as of 2025. The
27 Western Arctic Caribou Herd Working Group recently
28 classed by deferred at the critical declining
29 management level. And at this level some closures
30 according to the working group some closures to non-
31 Federally-qualified users may be necessary. According
32 to subsistence surveys conducted since 1988 by ADF&G,
33 Division of Subsistence, communities with a recent
34 documented history of harvesting caribou in the Noatak
35 closure area include Noatak, Kotzebue, Kiana and
36 Noorvik. The Northwest Arctic Council has testified
37 extensively about the impacts of non-Federally-
38 qualified users and aircraft on caribou and local
39 hunters' ability to continue using their subsistence --
40 their traditional subsistence use areas.

41
42 Since implementation of this closure in
43 2017 members of the Northwest Arctic Council have also
44 testified about its positive impacts particularly for
45 Noatak residents.

46
47 If this closure is rescinded non-Federally-qualified
48 users would be able to hunt caribou on Federal public
49 lands in the Unit 23 Noatak corridor except from August
50

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1 1st to October 31st when a separate newer closure to
2 caribou hunting by non-Federally-qualified users
3 applies to all Federal public in Unit 23.

4
5 The OSM preliminary or the OSM
6 conclusion is to retain the status quo. The current
7 closure is still necessary to continue subsistence uses
8 of the Western Arctic Caribou Herd for Federally-
9 qualified subsistence users. Since the closure has
10 been enacted user conflicts within the area have been
11 reduced and hunt experiences and harvest success of
12 Federally-qualified subsistence users have improved.
13 While a different -- in a unit wide closure to caribou
14 hunting by non-Federally-qualified users from August
15 1st to October 31st was implemented in 2024 this does
16 not provide a reason to remove the smaller Noatak
17 corridor closure. The Noatak corridor closure reviewed
18 here is year round where as the unit wide closure is
19 limited to the fall. Furthermore while the unit wide
20 closure contains a stipulation that it will not be in
21 effect if the herd exceeds 200,000 the Noatak corridor
22 closure does not have this condition attached. If the
23 Noatak corridor closure was to be rescinded and the
24 herd in turn exceeds 200,000 Federal public lands
25 throughout Unit 23 would then become open to non-
26 Federally-qualified users. This would result in more
27 user conflict and interfere with caribou harvest by
28 Federally-qualified subsistence users.

29
30 Thank you. That concludes my
31 presentation and I'm available to answer any questions.

32
33 CHAIRMAN CHRISTIANSON: Thank you,
34 Hannah. Any questions from the Board.

35
36 (No comments)

37
38 CHAIRMAN CHRISTIANSON: Hearing and
39 seeing none, thank you for the presentation. Any
40 summary of written public comment.

41
42 (No comments)

43
44 CHAIRMAN CHRISTIANSON: The Board shows
45 none.

46
47 DR. VOORHEES: Mr. Chair.

48
49 CHAIRMAN CHRISTIANSON: Go ahead,
50

0245

1 Hannah Voorhees.

2

3 DR. VOORHEES: Yes, for the record this
4 is Hannah Voorhees. There were no written public
5 comments during the open period.

6

7 CHAIRMAN CHRISTIANSON: Thank you.
8 We'll move to summary of tribal government and Alaska
9 Native Corporations.

10

11 MR. LIND: Mr. Chair, thank you.
12 Orville Lind, Native Liaison, OSM. There were no
13 written comments or resolutions for this proposal.

14

15 Thank you.

16

17 CHAIRMAN CHRISTIANSON: Thank you.
18 Tribal, Alaska Native organization testimony in the
19 room or online.

20

21 MS. CRAVALHO: Mr. Chair.

22

23 CHAIRMAN CHRISTIANSON: Yes.

24

25 MS. CRAVALHO: This is Liz Cravalho,
26 Vice President of Lands for Nana. We continue to
27 support this closure.

28

29 Thank you.

30

31 CHAIRMAN CHRISTIANSON: Thank you. Any
32 Advisory Group, SRC, State Advisory or multiagency
33 working groups.

34

35 MS. LAVINE: Thank you, Mr. Chair. The
36 Kobuk Valley Subsistence Resource Commission supports
37 retaining the closure. The Western Arctic Caribou Herd
38 continues to decline and there is no benefit to opening
39 it. We must do everything we can to minimize stress of
40 the herd while keeping food on the table of people in
41 the region. It is the right thing to do. And Cape
42 Krusenstern SRC supports retaining the closure for
43 WCR26-45.

44

45 Thank you.

46

47 CHAIRMAN CHRISTIANSON: Thank you. Any
48 public testimony here or online.

49

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0246

1 (No comments)

2

3 CHAIRMAN CHRISTIANSON: Hearing or
4 seeing none, Council recommendation.

5

6 MS. HENSLEY: Excuse me.....

7

8 CHAIRMAN CHRISTIANSON: Excuse me. Was
9 that just a bleep or do we have somebody? We have one
10 online.

11

12 MS. HENSLEY: Hi, I'd like to make a
13 comment, please.

14

15 CHAIRMAN CHRISTIANSON: You have the
16 floor. Thank you for being recognized.

17

18 MS. HENSLEY: Thank you. Qyanna. This
19 is Saatulik, S-A-A-T-U-L-I-K, Elizabeth Hensley in
20 Kotzebue and I'd just like to go on the record in
21 support of the closure, just echoing what Liz Cravalho
22 already said.

23

24 Thank you.

25

26 CHAIRMAN CHRISTIANSON: Thank you.
27 Appreciate you for calling in and testifying.

28

29 We'll move on to Council
30 recommendation.

31

32 MS. PILCHER: Good afternoon again.
33 Nissa Pilcher for the record, Council Coordinator for
34 the Northwest Arctic Regional Advisory Council. The
35 Council voted to unanimously retain the status quo for
36 WCR26-45. The Council believes that it is in the best
37 interest of subsistence users of the region to retain
38 the status quo for WCR26-45 to help the Western Arctic
39 Caribou Herd's population rebound. The Council said
40 that this closure directly impacts caribou by
41 protecting the resource and preventing user conflict.
42 The Council is concerned to hear that other herds
43 across the northern regions of Alaska are also in
44 decline and believes that that makes it even more
45 necessary for this closer to remain in effect at this
46 time.

47

48 Thank you.

49

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0247

1 CHAIRMAN CHRISTIANSON: Thank you. Any
2 questions from the Board.

3
4 Yes, Sara, you have the floor.

5
6 MS. BOARIO: Mr. Chair. Thank you.
7 Fish and Wildlife Service. As we've discussed over
8 these last couple days I think everyone's concerned
9 with user conflicts and impacts on subsistence users
10 and everyone's well-being. And I'm wondering in this
11 case seeing if there are any preliminary lessons
12 learned from the reduction in user conflict that's
13 being reported here. It may be too soon, but I -- I am
14 curious and I've heard colleagues wondering how do we
15 measure and track successes or lessons learned in other
16 places so that we can continue to address this across
17 the state.

18
19 Thank you.

20
21 MS. GREDIAGIN: Lisa.....

22
23 DR. VOORHEES: Mr. Chair, this is --
24 oh, go ahead, Lisa.

25
26 MS. GREDIAGIN: Yeah, sorry, Hannah,
27 it's hard when you're not in the room. I'll answer it
28 and see if you have anything to add, but, I mean, this
29 closure has kind of gone through many iterations ever
30 since 2016 and so initially we heard specifically from
31 the community of Noatak how effective this closure was
32 in enabling that community to -- for them to get
33 caribou, but I think since those initial years like
34 2016, 2018, you know, the past couple cycles we haven't
35 heard in my recollection a lot of feedback. But I'll
36 let -- Hannah probably has more specific information.

37
38 DR. VOORHEES: Thank you, Lisa, and
39 through the Chair. This is Hannah Voorhees. When this
40 closure was first put in place we did have a Northwest
41 Arctic Council member from Noatak. We no longer do so
42 it's made it a little bit more challenging to get real
43 time feedback on the status of the closure, but we
44 still do have information trickling in through a
45 Council member's connection to that community. And I
46 guess I would say yes, it has been -- the area has kind
47 of been for this closure has been refined over time, it
48 focuses on a critical traditional use area that was
49 also the focus of non-local hunters. I just think that
50

0248

1 yeah, it is a good example of how a closure can be
2 effective. And I think there's been a push since
3 really the mid '80s to protect use in this area and
4 it's actually taken kind of an overlap of special use
5 area, delayed entry and a closure to really reach a
6 point where it seems to be fully effective for the
7 community so it's quite multilayered and well
8 established at this time.

9

10 Thank you.

11

12 MS. BOARIO: Thank you.

13

14 CHAIRMAN CHRISTIANSON: Thank you. Any
15 other questions.

16

17 (No comments)

18

19 CHAIRMAN CHRISTIANSON: Alaska
20 Department of Fish and Game. Oh, yeah. Sorry, I
21 skipped a RAC there. I'm sorry, partner. Biggest guy
22 in the room.

23

24 MR. WOODS: Question for Lisa and OSM
25 Staff. Since Noatak National Preserve borders a
26 National Monument are those -- that special use area is
27 there a special designation for access to different
28 user groups?

29

30 MS. GREDIAGIN: This is Lisa Grediagin.
31 You're talking about the Noatak Preserve -- there's a
32 lot of different controlled use areas so which one are
33 you referring to because there's a Park Service delayed
34 entry zone and then the Noatak controlled use area?

35

36 MR. WOODS: So on the map just for
37 clarification as a new member and getting myself fully
38 up to speed on what -- so the closure is in the red
39 area and all that Kobuk Valley National Park -- Park
40 and Preserve National -- Noatak National Preserve, so
41 those -- that closure is still in place and what we're
42 voting on is to hold the status quo, the impacts of
43 that I'm inclined to agree with U.S. Fish and Wildlife
44 Service and the question of the user groups being in
45 conflict, but there's a whole different level of
46 regulation that matters. Is that specific area being
47 in a preserve and that special use area goes up into
48 the river system, all the way up into that -- the
49 middle of that preserve. I'm trying to get some
50

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1 historical background on the impacts of conflicts of
2 user groups when it was open and not -- I'll leave that
3 question -- I'll pull you on the side and ask later,
4 but then for practical purpose and time I would love to
5 get up to speed at some point on the preserve impacts
6 and those use areas because I've special -- those are
7 special use areas that I need to be up to speed on and
8 not the time to do it right now, right in the middle of
9 a proposal, but it would be good in the future to have
10 those designations, special use areas kind of listed
11 and outlined for like new Board members or this isn't
12 like this.

13

14 Thank you for putting up with me, but I
15 just had a question in the back of my mind how that all
16 looked. So.....

17

18 CHAIRMAN CHRISTIANSON: Thank you,
19 Frank, for being frank.

20

21 MR. WOODS: Yeah, being frank.

22

23 CHAIRMAN CHRISTIANSON: I keep getting
24 Rhonda, so I got to get Frank, right. Next we have
25 Louis.

26

27 MR. GREEN: Where's the drumroll.
28 Thank you, Mr. Chair. Our Council voted for status
29 quo, but I'll read the -- into the record. The Council
30 voted to retain the status quo of WCR26-45. The
31 Council stated that this closure was put in place due
32 to increased conflict of hunting pressure from non-
33 Federally-qualified users that were affecting the
34 migration pattern of the caribou herd around the Noatak
35 River area. After the closure was established
36 residents of the Noatak or of Noatak were again able to
37 harvest caribou near their community. In addition to
38 these original concerns which still apply the herd also
39 needs to be protected due to the serious conservation
40 concerns with the population recently having dropped to
41 about 120,000. It would be detrimental to the
42 Federally-qualified subsistence users in this area to
43 open up the area to competition from non-Federally-
44 qualified users. Maintaining the closure will protect
45 the herd when it starts to grow again. The Council
46 emphasized that it is important to continue to rely on
47 traditional ecological knowledge about the changes to
48 the Western Arctic Caribou Herd.

49

50

0250

1 And yesterday I told a little story
2 about a young man that was advocating for an old timer
3 in Noatak, that when we put this closure into place or
4 got it put into place that this old man was able to go
5 out and stalk caribou and hunt it and how he danced
6 around and it was, you know, relishing the idea that he
7 could actually go hunting again. So it was put in
8 place for a good reason, just that story alone.

9
10 Thank you, Mr. Chair.

11
12 CHAIRMAN CHRISTIANSON: Thank you. And
13 that's the second time you called Kenneth out as a
14 young man. He's sitting right back there, I talked to
15 him last night. Hi, young man, Kenneth. He's still
16 here in the room with us. And so when you get up to a
17 certain age and they call you young it's got to be
18 publicly recognized.

19
20 (Laughter)

21
22 CHAIRMAN CHRISTIANSON: That's one of
23 my best stories of being in the Board room and getting
24 that interaction between agencies and an assistant
25 commissioner at that time that role played a caribou
26 for us. So it set precedent to a working relationship
27 and so I'm glad Louis keeps bringing that story up.

28
29 We have other Regional Advisory Council
30 recommendations?

31
32 MS. CHAPA: Gisela Chapa for the record
33 Council Coordinator for North Slope RAC. And the
34 Council voted to retain the status quo on WCR26-45 and
35 explained that retaining the closure will benefit
36 subsistence users as it reduces caribou harvest by non-
37 Federally-qualified users and prevents user conflict
38 and competition for limited resources.

39
40 CHAIRMAN CHRISTIANSON: Thank you. I
41 think that concludes our Regional Advisory Councils.
42 Next we have Department of Fish and Game.

43
44 MR. MULLIGAN: Thank you, Mr. Chair.
45 For the record the Alaska Department of Fish and Game
46 supports rescinding the closure for three reasons. As
47 has been discussed amongst this Board for years now
48 since I've been here, non-Federally-qualified user
49 harvest of caribou is very low for the Western Arctic
50

0251

1 Herd. The State has instituted its own controlled use
2 area to help curtail State hunters coming into that
3 area in a certain way. And so that corridor is applied
4 to five miles on either side of and including the
5 Noatak River beginning at the mouth, oh, I'm going to
6 butcher that name and I am going to apologize for it, I
7 severely do, Agashashok River and extending upstream to
8 the mouth of the Nimiuktuk River. The area is closed
9 from August 15th to September 30th to the use of
10 aircraft in any manner for big game hunting including
11 the transportation of big game hunters, their hunting
12 gear and/or parts of big game.

13

14 And if -- just to note the -- and it
15 does -- so they can come in and out of a publicly owned
16 airport, the only publicly owned airport within that
17 area is the Noatak airport. Just there's no one
18 publicly owned airport further upstream so it's not
19 like they can fly in upstream in the controlled use
20 area. They'd only be able to fly into there.

21

22 And the third reason is as you heard
23 from OSM we did -- this Board did decide to put in
24 place the other closure so there is overlap as far as,
25 you know, the closure, what it does. So the State
26 feels that given the efforts that it has taken in its
27 controlled use area that you could rescind this closure
28 and have minimal to no impact to the members of Noatak
29 or to the community of Noatak.

30

31 With that said if folks do believe that
32 that controlled use area is not sufficient and would
33 like to look at further stipulations I will remind
34 everyone here as we've done so a few times now, we are
35 open for proposals in that area and would look forward
36 to seeing a proposal from anyone on the controlled use
37 area.

38

39 Thank you, Mr. Chair.

40

41 CHAIRMAN CHRISTIANSON: Thank you for
42 that, Mr. Mulligan. Any questions from the Board for
43 the State.

44

45 (No comments)

46

47 CHAIRMAN CHRISTIANSON: Appreciate it.
48 Thank you. InterAgency Staff Committee.

49

50

1 MS. LAVINE: Thank you, Mr. Chair. The
2 Federal Subsistence Board will need to consider a few
3 key sections of ANILCA before taking action on
4 proposals requesting closures and closure reviews.
5 Specifically those sections pertaining to Council
6 deference which is section .805(c) and those pertaining
7 to limitations to closure or restrictions of
8 subsistence and non-subsistence uses on Federal public
9 land in sections .815(3) and .816(b). These three
10 sections speak to the heart of Board authority and
11 require careful balance between the Federal priority,
12 the continuation of subsistence uses, the necessary
13 conservation of subsistence fish and wildlife and
14 unnecessary restrictions. In the case of WCR26-45 the
15 Western Arctic Caribou Herd population continuing on a
16 downward trend. The ISC suggests that Council's
17 recommendation to retain the closure to non-Federally-
18 qualified users in Unit 23 may meet the criteria for
19 deference.

20
21 Thank you, Mr. Chair. Thank you. Any
22 questions from the Board for ISC?

23
24 (No comments)

25
26 CHAIRMAN CHRISTIANSON: We'll call on
27 the Board discussion with the Liaison, Chairs and State
28 reps. Any -- this is your time for clarifications,
29 pointed questions?

30
31 (No comments)

32
33 CHAIRMAN CHRISTIANSON: Hearing and
34 seeing none we'll open up the floor for Board action
35 and a motion.

36
37 MR. STRIKER: Mr. Chair, the National
38 Park Service moves to maintain the status quo for
39 wildlife closure review 25 -- 26-45. And with a second
40 I'll explain why I intend to maintain the status quo.

41
42 MS. BOARIO: Fish and Wildlife Service
43 seconds.

44
45 MR. STRIKER: Thank you. And with
46 apologies for what might seem like repetition, I think
47 it's important to read in the record the basis for the
48 rationale for the motion that I'm making.

1 National Park Service moves to maintain
2 the status quo for wildlife closure review 26-45 in
3 deference to the Northwest Arctic, North Slope and
4 Seward Peninsula Subsistence Regional Advisory
5 Councils. The current closure is still necessary to
6 continue subsistence uses of the Western Arctic Caribou
7 Herd for Federally-qualified subsistence users and
8 specifically for Noatak residents. Since the closure
9 has been enacted local area subsistence communities
10 have reported reduced -- reductions in user conflicts
11 within the closure area and hunt experience and harvest
12 success of Federally-qualified subsistence hunters have
13 improved. While a unit wide closure to caribou hunting
14 by non-Federally-qualified users from August 1 to
15 October 31 was implemented in 2024, this does not
16 provide cause to remove the more geographically
17 restricted Noatak corridor closure. The Noatak
18 corridor closure reviewed in this analysis is year
19 round whereas the unit wide closure is limited to the
20 fall.

21
22 Migration timing of the Western Arctic
23 Caribou Herd is documented to be shifting in recent
24 years and no longer reliable timing that user -- that
25 local area communities have been accustomed to in the
26 past decades of harvest in this area. User conflicts
27 have also been documented in this area for decades with
28 the greatest concern documented by local subsistence
29 users observing fly in hunters who get ahead of the
30 herd migration and movement and affecting the immediate
31 behavior just as those Federally-qualified users are
32 attempting to hunt. Local rural subsistence
33 communities must spend a lot of time and money as we've
34 heard to access areas where the caribou are migrating
35 throughout this region, traveling long distances by
36 boat or snowmachine to reach the caribou. Harvest
37 success is essential to be able to afford the hunt
38 effort with the limited resources and high gas prices
39 to travel these long distances. As described by
40 Federally-qualified subsistence users any deflection of
41 the caribou by fly in hunters does have the potential
42 to affect subsistence harvest success especially now
43 with proposals to further reduce subsistence harvest
44 limits for the Western Arctic Caribou Herd harvest
45 successes will be critical to ensure the continuation
46 of subsistence uses. After the closure was established
47 residents of Noatak reported they were able to harvest
48 caribou nearer to their community.

1 In addition to these original concerns
2 which still apply the herd also needs to be protected
3 due to the serious conservation concerns with the
4 population continuing to drop precipitously. It would
5 be detrimental to Federally-qualified subsistence users
6 in this area to open up the area to competition from
7 non-Federally-qualified users. Retaining the closure
8 is important to support the success, the conservation
9 of the caribou, afford for the subsistence priority in
10 times of caribou conservation concerns and ensure the
11 continuation of subsistence uses. In addition to the
12 three RACs supporting this -- maintaining this closure
13 the Cape Krusenstern, Kobuk Valley and Gates of the
14 Arctic Subsistence Resource Commissions also supported
15 maintaining this closure for the continuation of
16 subsistence uses, maintaining subsistence priority
17 especially in areas traditionally hunted by local
18 subsistence communities and in support of all
19 conservation efforts for the Western Arctic Caribou
20 Herd, making it similar to my mind the last one in
21 terms of the deference that we need to give with
22 respect to ANILCA .805.

23
24 Thank you, Mr. Chair.

25
26 CHAIRMAN CHRISTIANSON: Thank you for
27 that, Don, for the record. Any Board deliberation,
28 discussion.

29
30 (No comments)

31
32 CHAIRMAN CHRISTIANSON: Hearing and
33 seeing none we'll do roll call. For the record please
34 read the motion.

35
36 MS. LEONETTI: All right. The motion
37 is to retain the status quo on WCR26-45 and I'll start
38 with Park Service Member Striker.

39
40 MR. STRIKER: Thank you. I support.

41
42 MS. LEONETTI: BLM Member Pendergast.

43
44 MR. PENDERGAST: BLM votes to support
45 the status quo. But I'll note this is a -- this is a
46 difficult call. I think whether or not this is
47 actually supported by substantial evidence it is a
48 difficult question to answer given the information
49 presented before us. A question was asked about if
50

0255

1 we've heard since 2018 from users, you know,
2 experiencing improvement from this closure and I think
3 the answer was basically no, we heard a comment in 2018
4 I think that improved and, you know, as I look through
5 I see a lot of concerns about future potential effects,
6 but not that closure currently is actually changing
7 that. So I just -- I don't have the time to dig deep
8 enough to come up with a non-deference to the RAC on
9 this one, but I just want to note for the record it's a
10 very close call, but I'll go ahead and retain the
11 status quo for now.

12

13 Thanks.

14

15 MS. LEONETTI: Public Member Payenna.

16

17 MR. PAYENNA: I vote to retain the
18 status quo.

19

20 MS. LEONETTI: Public Member Woods.

21

22 MR. WOODS: I vote yes in favor of the
23 status quo and through the RACs' action items and their
24 request to us.

25

26 Thank you.

27

28 MS. LEONETTI: Public Member Oney.

29

30 MR. ONEY: Public Member Ray Oney moves
31 to retain status quo.

32

33 MS. LEONETTI: BIA Member John.

34

35 MS. JOHN: BIA votes to maintain
36 closure in WCR26-45 as recommended and justified by the
37 Northwest Arctic, Seward Peninsula and North Slope
38 RACs.

39

40 MS. LEONETTI: Fish and Wildlife
41 Service Member Boario.

42

43 MS. BOARIO: The Fish and Wildlife
44 Service votes to retain the status quo in deference to
45 the Northwest Arctic, North Slope and Seward Peninsula
46 Regional Advisory Councils. This closure is still
47 necessary to continue subsistence uses of the Western
48 Arctic Caribou Herd as the National Park Service
49 enumerated and I believe if I'm remembering correctly
50

0256

1 we were told that the population is critical declining
2 status. We are also pleased to hear that user
3 conflicts have decreased as a result of this closure
4 and would value the compilation and exchange of
5 information on lessons learned in that regard.

6

7

Thank you.

8

9

MS. LEONETTI: Public Member Pitka.

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Thank you.

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(Off record)

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(On record)

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CHAIRMAN CHRISTIANSON: All right. We're getting ready to start again here today. Just for the order of business we'll give you guys an idea. We've got a hard stop -- I was going to go late into the evening, but I understand everybody else has his

0257

1 life too so we're probably going to go until 6:00
2 o'clock. That way we keep it reasonable, respectful to
3 everybody's time and other lives that they do have.
4 And we'll make up the difference when we make it up.
5 So like -- so if you're the one I go like that too
6 you're probably the one that needs to talk less.

7

8 (Laughter)

9

10 CHAIRMAN CHRISTIANSON: You got the
11 floor. Right off the bat we were going to call on
12 Louis. Yes, we are on 26-53.

13

14 MR. GREEN: All right. So I'll read
15 into the record Wildlife Proposal 26=53, Unit 22B and
16 22D, caribou. It was asked to modify season dates.
17 The Council -- leading into this the Council's saddened
18 to learn of the passing of Tommy Gray a few weeks prior
19 to our fall meeting. He was on the Seward Peninsula
20 RAC for 21 years and he herded reindeer in this area.
21 Anyway in our fall meeting, 2025 meeting, the Council
22 voted to defer the WP26-53 until more information on
23 reindeer herd was made available. At the time the
24 Council stated that leaving this area open would
25 maintain the current level of opportunity for user.
26 Now delaying a decision until the status of the
27 reindeer herd is determined will keep this opportunity
28 open unless the closure is necessary. Then we went
29 into the winter meeting of 2026. The Council revisited
30 the proposal again and after receiving additional
31 information regarding the status of the reindeer herd
32 within those units the Council voted to defer WP26-53
33 until the 2028 wildlife regulatory cycle.

34

35 ADF&G plans to submit a proposal to the
36 Alaska Department -- Board of Game to codify these
37 changes in State regulation. Currently ADF&G announces
38 the closure each year through emergency order.
39 Adopting this proposal now would result in Federal
40 regulation being more restrictive than codified State
41 regulations so our vote was to defer this proposal to
42 the next wildlife cycle, is to know whether or not the
43 Board of Game adopts these changes and they are
44 codified in State regulation.

45

46 So, Mr. Chair, that's all I have for
47 that.

48

49 CHAIRMAN CHRISTIANSON: Thank you,

50

0258

1 Louis. So you're requesting that we defer this to a
2 later date?

3

4 MR. GREEN: Yes, sir. Thank you, Mr.
5 Chair.

6

7 MR. PENDERGAST: Mr. Chair.

8

9 CHAIRMAN CHRISTIANSON: To when, to
10 the.....

11

12 MR. GREEN: To the following cycle, I
13 think it's 2028 wildlife regulatory cycle.

14

15 CHAIRMAN CHRISTIANSON: Okay. Thank
16 you. So I'll just -- I was just trying to clarify that
17 so the Board can make that motion to defer.

18

19 MR. WOODS: Move to defer.

20

21 MR. PENDERGAST: Mr. Chair.

22

23 CHAIRMAN CHRISTIANSON: Yes, go ahead.

24

25 MR. PENDERGAST: I don't know if it's a
26 point of order, but I'm trying to understand where
27 we're at. We've got a non-consensus agenda item we're
28 taking up so are we just jumping right to a motion, the
29 motion -- I mean.....

30

31 CHAIRMAN CHRISTIANSON: Well, this one
32 here he's requesting that they haven't had enough time
33 to review it, that they'd like to defer it to a later
34 date. So in doing so we have to entertain that motion
35 right now. So we have a Regional Advisory Council
36 asking us to pull it off of full -- us making a
37 decision on it today, just to move it to a later date
38 until they have enough time to get enough information
39 that we can make a clear decision.

40

41 MR. PENDERGAST: Right. I understand
42 that's their recommendation in the actual materials so
43 we worked up a motion to that effect. But we're just
44 kind of jumping over all that to defer. And so I'm --
45 BLM does have a position on this and is ready to make a
46 motion today. So I'm not sure more time would
47 accomplish if the Council recommendation already is to
48 defer, just feels like we're kind of skipping over the
49 process in consideration of this proposal.

50

0259

1 CHAIRMAN CHRISTIANSON: Is there
2 another thought on the Board here?

3
4 MR. WOODS: In lieu of BLM's position
5 can we defer and put it on the table or adopt 26-53 and
6 then you make your comments and then we vote on that
7 deferral because it would bring the same -- everything
8 to the table that you have concerns. And if we vote it
9 down, if your testimony and your concerns are valid
10 enough we can up or down this or take it up as a -- as
11 it's on the table, but this would bring it -- so my
12 motion would basically bring it to the table and answer
13 the RAC's request to defer. It would bring it to
14 discussion and we could go from there.

15
16 CHAIRMAN CHRISTIANSON: Hold on one
17 second. We have a process clarification.

18
19 Robbin.

20
21 MS. LAVINE: Thank you, Mr. Chair. If
22 one of the Board members is requiring the full public
23 process for this which includes his comments and some
24 discussion on the record and it would also include the
25 recommendations from the Regional Advisory Council and
26 ADF&G and the ISC, then proceed with it on the agenda
27 and its full public process. And if that's what you
28 are requesting -- you may end up deferring as the
29 Council requested or you may end up through the public
30 process taking a different action, but I believe you
31 either defer or continue with the full public process.

32
33 Thank you, Mr. Chair.

34
35 MR. PENDERGAST: And, Mr. Chair, I --
36 just to be clear I think that is what as a Board Member
37 I'm asking that we do. And it's because of the nature
38 of this particular proposal. And, you know, it's --
39 it's just a little bit different in its pieces and
40 parts. And so I think it is best that we go ahead and
41 take it up as it's been looked at and analyzed by all
42 relevant parties and BLM's developed a motion and
43 Council's made a recommendation to defer, it's in the
44 records, but don't see any reason why we wouldn't just
45 proceed.

46
47 CHAIRMAN CHRISTIANSON: Anybody seeing
48 it different?

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1 (No comments)

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CHAIRMAN CHRISTIANSON: All right.

We'll ask for the Staff to go ahead and present.

MR. UBELAKER: Thank you, Mr. Chair.

For the record Brian Ubelaker, Wildlife Biologist with the Office of Subsistence Management. And I will give you a brief summary of proposal WP26-53 which can be found on page 1159 of your meeting materials.

This proposal submitted by the Alaska Department of Fish and Game requests changing caribou seasons in portions of units 22B west and 22D pilgrim, to year round may be announced seasons. This would combine current split seasons into a single July 1st through June 30th may be announced season. The proponent states this change is necessary because reindeer herding has been renewed in this area and changing the year round open seasons to a may be announced season would prevent accidental reindeer harvest. This change would also align Federal and State regulations without affecting subsistence opportunity as Western Arctic Caribou Herd caribou have not been documented in the area since 2015.

Federal and State regulatory measures have previously modified caribou hunting seasons in Unit 22B west and 22D pilgrim primarily to safeguard reindeer herds. In 2006 were shortened and changed to may be announced to safeguard reindeer. Under current Federal regulations these units have split seasons of October 1st through April 30th and May 1st through September 30th. While surrounding units already have year round may be announced seasons. State regulations also manage caribou hunting in these areas as may be announced seasons. But the Alaska Department of Fish and Game closed them by emergency order in 2024 and 2025 because no collared caribou had been documented in this area since 2015.

The most recent biological data show the Western Arctic Caribou Herd has been declining with an estimated 121,000 animals in 2025. Historically the herd wintered on the Seward Peninsula, but collared caribou have not been documented in units 22B west or 22D pilgrim since 2015. Recent collaring studies by the Alaska Department of Fish and Game and the National Park Service are tracking movements of small resident

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1 groups of caribou, but their distribution remains
2 uncertain. Reported harvest in these specific hunt
3 areas has been very low averaging only three animals
4 per year from 2008 to 2023 with no reported harvest
5 since 2021.

6
7 One alternative considered was to give
8 Federal in-season managers authority to define smaller
9 harvest areas. This would allow for opportunity if
10 caribou move through the area, but this was not pursued
11 because too little is known about the remnant caribou
12 populations on the Seward Peninsula.

13
14 Another option would be to defer this
15 proposal until the State changes its codified
16 regulations. This would keep Federal rules from being
17 more restrictive and would allow for more discussion
18 with stakeholder groups.

19
20 If adopted this proposal would shift
21 units 22B west and 22D pilgrim to year round may be
22 announced seasons. This would reduce the chance of
23 accidentally harvesting reindeer and align and simplify
24 Federal and State regulations. Subsistence opportunity
25 would technically decrease in these areas, but in
26 practice caribou haven't been present in these areas
27 for years as you can see on the map. The amount of
28 Federal public lands is very limited. Other units of
29 22 that have year round seasons will remain unchanged
30 allowing for harvest opportunity.

31
32 If this proposal is not adopted no change in
33 Federal opportunity will occur, but harvest in this
34 area has not occurred since 2021 and Federally-
35 qualified subsistence users would have to exercise
36 caution harvesting caribou in the area to ensure no
37 reindeer are mistakenly harvested.

38
39 Therefore OSM's preliminary -- excuse
40 me. OSM's recommendation is to be neutral on proposal
41 WP26-53. This proposal balances conservation and
42 subsistence priorities for Federally-qualified users.
43 While it slightly decreases subsistence opportunity
44 reported caribou harvest has not occurred in the area
45 for several years so affects should be minimal. The
46 main benefit would be preventing accidental harvest of
47 private reindeer.

48
49 And with that I'm happy to answer any
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1 questions.

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CHAIRMAN CHRISTIANSON: Thank you. Any questions from the Board for Staff.

(No comments)

CHAIRMAN CHRISTIANSON: Hearing and seeing none, thank you for the presentation. Any summary of written public comment.

MR. UBELAKER: Mr. Chair, no public comments were submitted.

CHAIRMAN CHRISTIANSON: Thank you. Summary of tribal government and Alaska Native corporation consultation.

MR. LIND: Thank you, Mr. Chair, Board members. Orville Lind, Native Liaison. There were no comments or resolutions for this proposal.

Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you. Tribal, Alaska Native organization testimony.

(No comments)

CHAIRMAN CHRISTIANSON: Advisory Group testimony, SRC, State Advisory and multiagency work groups.

MS. LAVINE: Thank you, Mr. Chair. There are none that I'm aware of. And anyone online if you would like to speak to an AC comment or an SRC comment you can press star, five to raise your hand or use the function to raise your hand on Teams.

(No comments)

CHAIRMAN CHRISTIANSON: Any public testimony online or here in the room.

MR. NOONGWOOK: Yes, hi. Through the Chair. This is.....

CHAIRMAN CHRISTIANSON: Sorry. We lost you.

0263

1 MS. LAVINE: Hello. Individual online
2 we would like to hear from you. If you were somehow
3 muted you can press star, six to unmute yourself. Try
4 again.

5
6 MR. NOONGWOOK: Yeah, this is Edwin
7 Noongwook with tribal -- Native Village of Savoonga
8 tribe. And I just wanted to question on your caribou
9 out there the number's declining, has there been any
10 research or subsistence hunters giving information on
11 the tundra to see if there's ice, if they're feeding or
12 because we're having flash -- flash floods out here in
13 our private island with our reindeer, private reindeer
14 that we have. So it's good to have information, what's
15 going on from the region. So I'd like to, you know,
16 hear more information from other people that might
17 share of the environment and the conditions of the
18 tundra for the caribou.

19
20 CHAIRMAN CHRISTIANSON: Thank you. I'm
21 not sure if we have a condition assessment.

22
23 Lisa.

24
25 MS. GREDIAGIN: This is Lisa Grediagin
26 for the record. Thanks for the question and this
27 definitely isn't the best place to get that question
28 answered, but I can't say that, you know, the Western
29 Arctic Caribou Herd used to winter extensively in Unit
30 22 because of the lichen there and they haven't been
31 there in the last, you know, six years or so. And one
32 of the thoughts might be because the lichen has been
33 depleted although there still are some caribou present,
34 you know, year round in that. But I would encourage
35 you to reach out to the Bering Land Bridge and Park
36 Service in Nome to get more information on habitat on
37 the ground in Unit 22.

38
39 MR. NOONGWOOK: Thank you for the
40 information.

41
42 CHAIRMAN CHRISTIANSON: Thank you,
43 Lisa. Any other public testimony.

44
45 (No comments)

46
47 CHAIRMAN CHRISTIANSON: Council
48 recommendations.

49
50

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1 MR. GREEN: Mr. Chair.

2

3 CHAIRMAN CHRISTIANSON: Louis.

4

5 MR. GREEN: Council recommends to defer
6 to next cycle and for the purposes of waiting to see
7 what Alaska Department of Fish and Game does.

8

9 Thank you.

10

11 CHAIRMAN CHRISTIANSON: Thank you,
12 Louis. Western Interior.

13

14 MR. REAKOFF: Western Interior will
15 agree with Seward Peninsula on this one. We didn't
16 take this proposal up.

17

18 Thank you, Mr. Chair.

19

20 CHAIRMAN CHRISTIANSON: Thank you,
21 Jack. Northwest Arctic.

22

23 MS. PILCHER: Good afternoon again.
24 This is Nissa Pilcher for the record. Northwest Arctic
25 Regional Advisory Council voted to defer proposal WP26-
26 53 to the home region. The proposal concerns Unit 22
27 and the Council does not have enough local knowledge on
28 this topic.

29

30 Thank you.

31

32 CHAIRMAN CHRISTIANSON: Thank you.
33 Alaska Department of Fish and Game.

34

35 MR. MULLIGAN: Thank you, Mr. Chair.
36 Alaska Department of Fish and Game supports its own
37 proposal. You've heard many of the reasons given, the
38 overview given by Mr. Ubelaker. This was our proposal
39 and the main reason is to provide that flexibility in
40 those hunts so we could minimize any chance that those
41 private reindeer herds would accidentally be taken during
42 a season. Given Seward Peninsula RAC's suggestion to
43 defer, if that means keeping this alive, having further
44 conversations, seeing what our Board of Game is going
45 to do, we will support that rather than having an up or
46 down vote at this time.

47

48 Thank you.

49

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0265

1 CHAIRMAN CHRISTIANSON: Thank you, Ben.
2 InterAgency Staff Committee.

3
4 MS. LAVINE: Title VIII of ANILCA
5 prioritizes conservation of healthy wildlife
6 populations in continuation of subsistence uses. The
7 primary justification for this proposal is to align
8 with proposed State regulations and prevent accidental
9 harvest from local reindeer herds which range on
10 Federal lands where grazing permits are issued.
11 Adopting this proposal will decrease subsistence
12 opportunity by changing the seasons in both units 22B
13 west and 22D pilgrim to year round may be announced.
14 ADF&G has managed State lands in these areas by issuing
15 emergency orders in 2024 and 2025, keeping it closed
16 unless caribou are documented in the area. This is not
17 an alignment with State regulations. This regulatory
18 change has not gone before the Board of Game. ADF&G
19 has said it may submit this same proposal to the Board
20 of Game to take it up when it meets next in January of
21 2027.

22
23 While collared Western Arctic caribou
24 have not been present in either hunt area in recent
25 years, public testimony at the 2026 winter Seward
26 Peninsula SRC or sorry, Seward Peninsula Regional
27 Advisory Council meeting in Nome indicated that small
28 groups of caribou have been seen in 22B west.
29 Historically the Council and local hunters have
30 described groups of caribou in these hunt areas and
31 elsewhere on the Seward Peninsula. There are limited
32 data on the small remnant groups of the Western Arctic
33 Herd remaining on the Seward Peninsula. In 2025 the
34 National Park Service initiated a caribou radio
35 telemetry and traditional knowledge project on the
36 caribou present on the northern Seward Peninsula. This
37 information may be helpful in making informed decisions
38 on the management of these groups of caribou in the
39 future. Reindeer are domesticated range
40 (indiscernible) and those present on the Seward
41 Peninsula are private property. Reindeer herding is a
42 commercial enterprise.

43
44 Changing the seasons of these two hunt
45 areas to year round may be announced would represent a
46 decrease in the subsistence opportunity to harvest
47 caribou. At its 2026 meeting the Council voted to
48 defer any action on this proposal given uncertainty of
49 the future of the reindeer herd in Unit 22B due to the
50

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1 passing of the owner.

2

3 For these reasons the ISC concurs with
4 the Council that the Board defer taking action on this
5 proposal.

6

7 Thank you, Mr. Chair.

8

9 CHAIRMAN CHRISTIANSON: Thank you.
10 Next Board discussion with Liaison, Council Chair and
11 State reps. This is our opportunity to speak to it
12 with our support group here.

13

14 (No comments)

15

16 CHAIRMAN CHRISTIANSON: Hearing and
17 seeing none, we open up the floor for Board action.

18

19 Kevin.

20

21 MR. PENDERGAST: Mr. Chair, BLM moves
22 to adopt Wildlife Proposal 26-53. If I get a second
23 I'll start discussion by explaining why I intend to
24 vote to oppose my motion.

25

26 MS. PITKA: Sorry. Public Member
27 Rhonda Pitka seconds the motion.

28

29 MR. PENDERGAST: Thank you. So the
30 intent of the proposal is to prevent the accidental
31 harvest of commercial reindeer by Federally-qualified
32 subsistence users who are attempting to harvest caribou
33 on Federal lands in units 22B and D, bravo and delta.
34 Caribou are seldom observed as we've heard in units 22B
35 and D and harvest levels are low. However Federally-
36 qualified subsistence users are opportunistic as we
37 know as they harvest resources when they are available.
38 Seward Peninsula RAC members have reported recently
39 observing small numbers of caribou in these units and
40 while harvest levels are low data does demonstrate that
41 Federally-qualified subsistence users do harvest
42 caribou from these units when they are available. Data
43 therefore suggest changing the caribou season in these
44 units to a may be announced would reduce opportunity
45 for Federally-qualified subsistence users to harvest
46 caribou for subsistence uses. Under ANILCA this Board
47 should not reduce the opportunities of Federally-
48 qualified subsistence users for private, commercial
49 enterprises such as reindeer herding on Federal land.

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1 For these reasons BLM opposes WP26-53.

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3 CHAIRMAN CHRISTIANSON: The floor is
4 open for discussion.

5

6 MR. WOODS: Mr. Chair.

7

8 CHAIRMAN CHRISTIANSON: Frank.

9

10 MR. WOODS: Motion to defer 26-53 to
11 the RAC, is that next or are we.....

12

13 CHAIRMAN CHRISTIANSON: We have a
14 motion that has been seconded right here by.....

15

16 MR. WOODS: Oh, yeah, I'm -- sorry, I'm
17 all.....

18

19 CHAIRMAN CHRISTIANSON: Yeah, we're --
20 we're actively in the middle of a -- yeah.

21

22 MR. WOODS. I was reading, but lost
23 track.

24

25 CHAIRMAN CHRISTIANSON: Yeah. So we're
26 now in deliberation. We have a motion that was
27 seconded.

28

29 CHAIRMAN CHRISTIANSON: Don. Oh,
30 sorry. Jerry.

31

32 MR. INGERSOLL: Jerry Ingersoll, Forest
33 Service. Point of order. Is there a way of tabling
34 the motion or -- I mean, tabling consideration and
35 essentially achieving the goal of deferring
36 consideration of this motion to the -- as requested on
37 the -- to the next regulatory cycle. I mean, I'd have
38 to flip out my Robert's Rules, but I'm not sure how we
39 get from deliberating and voting on the motion to
40 potentially deferring it now.

41

42 CHAIRMAN CHRISTIANSON: Go ahead,
43 Kevin.

44

45 MR. PENDERGAST: Well, I was just going
46 to say are we in -- is this discussion phase?

47

48 CHAIRMAN CHRISTIANSON: This is
49 discussion phase, we are looking for support or no

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1 support, yeah.

2

3

4 MR. PENDERGAST: Well, so what I would
5 observe is that and, you know, the substance of my
6 motion, BLM's motion, is orientated towards the fact
7 that we're mixing protecting commercial interests here
8 with subsistence priority under ANILCA. And that's not
9 our role and that's why I felt it important to bring
10 this up today. So whether we defer or not, you know,
11 we're operating in an arena of deferring to understand
12 impacts on a commercial enterprise which is outside our
13 mandate. So that's the substance of my motion.

13

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CHAIRMAN CHRISTIANSON: Frank.

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Thank you.

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MS. PITKA: Sorry. Can we get
everybody's.....

CHAIRMAN CHRISTIANSON: I want Lisa to
speak to this real quick.

MS. DOEHL: Through the Chair. My
question is has someone made a motion to postpone this
because we have a motion to address WP26-53, but
someone could propose or make a motion to postpone it
and then that would have to be considered before

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1 deciding whether to go ahead and vote on the main
2 motion.

3

4

5 MR. PENDERGAST: And since we're in --
6 Kevin, BLM. Through the Chair. I think since we're in
7 discussion phase I'll just observe what I understood,
8 you can correct me if I'm wrong, Frank, is he was
9 saying it would have the same affect. If we vote it up
10 or down and it goes -- you know, if folks agree with my
11 motion then it doesn't mean it can't come back up,
12 doesn't mean RACs can't discuss it further if they want
13 to, but at least we're acting within our mandate under
14 ANILCA here.

14

15

16 CHAIRMAN CHRISTIANSON: I think from a
17 Robert's Rules perspective Louis can't make a motion to
18 this Board. So the RAC recommending to defer would
19 have needed to have had a Board Member make a motion to
20 defer consideration of this. And then we as a Board
21 could have voted on that. We didn't do that. Now we
22 have a motion that's been seconded. The only way to
23 stop consideration of the motion right now if you in
24 fact want to stop consideration of the motion so that
25 you can instead make a motion to defer would be for
26 somebody to move, right?

26

27

27 MS. LEONETTI: To withdraw the motion.

28

29

29 CHAIRMAN CHRISTIANSON: Yeah, or to
30 table the motion.

31

32

32 MS. LEONETTI: Right. But.....

33

34

34 CHAIRMAN CHRISTIANSON: Until you see
35 the results of the next motion.

36

37

37 MS. WESSELS: Mr. Chair.

38

39

39 CHAIRMAN CHRISTIANSON: Katya.

40

41

42 MS. WESSELS: So you have a motion on
43 the floor that's been seconded. What needs to happen
44 you need to withdraw the motion. The maker of the
45 motion is to say I would like to withdraw the motion
46 and if the second agrees then that motion is null.
47 Then you make a new motion. Alternatively you also can
48 -- somebody can make a motion to amend the initial
49 motion, but that's more complicated. So the cleaner
50 way is to withdraw the original motion if of course the

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1 maker of the motion wants to do that.

2

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Thank you.

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MR. PENDERGAST: Mr. Chair.

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CHAIRMAN CHRISTIANSON: Kevin, go ahead.

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MR. PENDERGAST: I didn't mean to get us into complicated Robert's Rules' waters here, but really I think the issue here is pretty simple. Again we're -- my motion is underpinned by the notion that we are mixing protection of a commercial enterprise through the authorities afforded us under ANILCA subsistence priority. That is outside of our mandate as a Board so I would suggest if folks support my motion a simple down vote means yeah, this goes away for now, it doesn't mean it can't -- RACs can pursue it further if they want to, folks can make more proposals in the future, but it takes what I believe to be proper action on this proposal before us today.

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CHAIRMAN CHRISTIANSON: We did get a second so we are here in the weeds or the caribou or the reindeer I mean.

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MR. WOODS: Call the question for the motion, Mr. Chair, to clarify that we're -- what we just got done discussing for in the weeds.

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Thank you.

CHAIRMAN CHRISTIANSON: Yeah, so we have a vote and so as far as Board policy right now when we have a Board Member call the question that means that means that we've discussed it enough and so right now it requires two-thirds of this Board to move forward to vote on the original motion. So that is what we have done with our Robert's Rules here as a matter of policy, we used a question now to call into question how long we're going to deliberate this one. And so right now I have Frank saying he thinks we've discussed it enough and so we're going to take a vote here whether we're going take a vote on the original motion or not. That's how we're going to handle it today, up or down per the Chairman.

MS. LEONETTI: Okay. This is a vote to

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1 end debate on the motion. So if you would like to end
2 debate on the motion say yes, if you would like to
3 continue debate on the motion say no.

4
5 Public Member Pitka.

6
7 MS. PITKA: Yes.

8
9 MS. LEONETTI: Fish and Wildlife
10 Service Member Boario.

11
12 MS. BOARIO: Fish and Wildlife Service,
13 yes.

14
15 MS. LEONETTI: BIA Member John.

16
17 MS. JOHN: Bia, yes.

18
19 MS. LEONETTI: Public Member Oney.

20
21 MR. ONEY: Public Member Ray Oney, yes.

22
23 MS. LEONETTI: Public Member Woods.

24
25 MR. WOODS: Public Mem -- yes.

26
27 MS. LEONETTI: Public Member Payenna.

28
29 MR. PAYENNA: Yes.

30
31 MS. LEONETTI: BLM Member Pendergast.

32
33 MR. PENDERGAST: Aye. With all
34 appreciation to folks trying to keep us in line with
35 Robert's Rules.

36
37 MS. LEONETTI: Park Service Member
38 Striker.

39
40 MR. STRIKER: Yes. Get her done.

41
42 MS. LEONETTI: Forest Service Member
43 Ingersoll.

44
45 MR. INGERSOLL: Yes.

46
47 MS. LEONETTI: Chair Christianson.

48
49 CHAIRMAN CHRISTIANSON: Yes.

50

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1 MS. LEONETTI: Okay. Mr. Chair, debate
2 has ended.
3
4 CHAIRMAN CHRISTIANSON: Roll call.
5
6 MS. LEONETTI: Okay. The motion on the
7 floor is to adopt Wildlife Proposal 26-53 as written.
8
9 BLM Member Pendergast.
10
11 MR. PENDERGAST: Oppose.
12
13 MS. LEONETTI: Park Service Member
14 Striker.
15
16 MR. STRIKER: Oppose.
17
18 MS. LEONETTI: Forest Service Member
19 Ingersoll.
20
21 MR. INGERSOLL: Oppose.
22
23 MS. LEONETTI: Public Member Pitka.
24
25 MS. PITKA: Oppose. Thank you.
26
27 MS. LEONETTI: Fish and Wildlife
28 Service Member Boario.
29
30 MS. BOARIO: Oppose.
31
32 MS. LEONETTI: BIA Member John.
33
34 MS. JOHN: Oppose.
35
36 MS. LEONETTI: Public Member Oney.
37
38 MR. ONEY: Oppose.
39
40 MS. LEONETTI: Public Member Woods.
41
42 MR. WOODS: Oppose.
43
44 MS. LEONETTI: Public Member Payenna.
45
46 MR. PAYENNA: Opposed.
47
48 MS. LEONETTI: And Chair Christianson.
49
50

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1 CHAIRMAN CHRISTIANSON: Oppose.

2

3 MS. LEONETTI: Okay. The motion to
4 adopt 26-53 fails.

5

6 CHAIRMAN CHRISTIANSON: And I would
7 like to thank Kevin for reminding us of our policy
8 there and us using it in real time.

9

10 Thank you, Frank, for recognizing that
11 and sometimes Board training does help to save time.

12

13 Thank you to the Staff or that because
14 they did a good job training us last month. But we're
15 still learning as you can tell up here so bear with us,
16 public.

17

18 Thank you. WP26-54.

19

20 MR. UBELAKER: Thank you, Mr. Chair.
21 Once again for the record Brian Ubelaker. And this is
22 a summary of the analysis for Wildlife Proposal WP26-54
23 regarding moose in Unit 22. The analysis can be found
24 on page 1179 of your meeting materials.

25

26 This proposal submitted by the Alaska
27 Department of Fish and Game requests rescinding all
28 three Federal public land closures to non-Federally-
29 qualified users for moose in Unit 22A. These closures
30 currently apply to 22A Unalakleet, 22A north and 22A
31 remainder. The proponent states the closures are no
32 longer biologically necessary. ADF&G latest abundance
33 surveys -- survey estimates the moose population above
34 management objectives and harvest levels are below the
35 available surplus.

36

37 These three closures have been in place
38 for a long time. Federal public lands were first
39 closed within Unit 22A to all non-Federally-qualified
40 users in 1995 due to conservation concerns. Through
41 the early 2000s as moose numbers dropped these closures
42 were expanded and seasons were shortened. More
43 recently though regulations have trended toward
44 reopening. In 2018 a moose population -- as moose
45 populations increased closures were considered for
46 rescinding, but instead restrictions were incrementally
47 relaxed by opening to all Federally-qualified
48 subsistence users. In 2020 the closure was lifted for
49 the month of September which corresponds with the State
50

1 season in 22A remainder allowing all users to harvest
2 on Federal public lands. In 2022 the same action was
3 taken for 22A north, opening to all users during the
4 State sport season. The Unalakleet closure was
5 modified at the same time to allow all Federally-
6 qualified users to harvest moose. In 2024 after seven
7 years of may be announced status the State codified the
8 winter moose season in Unalakleet from December 1st
9 through the end of February.

10

11 Management objectives for Unit 22A call
12 for a population of 600 to 800 moose with a post
13 harvest ratio of 30 bulls to 100 cows. ADF&G expects
14 an annual harvest of 300 to 680 moose across all of
15 Unit 22. The most recent surveys tell us that moose
16 numbers are not only healthy, but well above objectives
17 in 22A. The Alaska Department of Fish and Game only
18 surveys Unit 22A Unalakleet and then extrapolates those
19 numbers towards the rest of the unit. The moose
20 population in 22A Unalakleet has been increasing since
21 2003 and in 2025 the estimate was almost 1,000 moose
22 for the area. Bull to cow ratios have consistently
23 been high and sometimes very high at over 100 bulls to
24 100 cows. Calf recruitment has also been strong with
25 ratios generally at or above 30 calves per 100 cows.
26 In short the data shows a stable or increasing
27 population with a surplus of bulls. Since only 22A
28 Unalakleet is surveyed additional data from adjacent
29 units were also analyzed for the Unit 22A remainder.

30

31 Population data from Unit 18, lowest
32 Yukon in the Andreafsky survey areas were considered
33 along with Unit 21E data. All three of these survey
34 areas have a relatively high population density and
35 although the extent of dispersal from these units has
36 not been studied it is likely that migration into the
37 south end of Unit 22 is occurring as has been stated by
38 local residents.

39

40 Harvest data tells us a similar story.
41 Since 2000 about 71 percent of Unit 22A harvest has
42 been taken by local residents primarily from Unalakleet
43 and Chalkyitsik. The majority of Federal public lands
44 in this unit are remote and are usually accessed by
45 aircraft meaning there is little overlap between
46 subsistence harvesters and guided non-resident hunters
47 in units 22A north and remainder. In Unalakleet almost
48 all moose are harvested by local residents, about 93
49 percent since 2000. There currently is no State non-
50

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1 resident season in Unit 22A Unalakleet. In 22A north
2 reported local resident harvest has been extremely low
3 averaging only two moose per year. Household surveys
4 suggest this is underreported and actual harvest is
5 closer to 10 to 15 animals annually. Non-resident
6 harvest is also very low in 22A north. In 22A
7 remainder the most recent harvest has been by non-
8 residents, about 63 percent since the closure was
9 rescinded. Local residents have reported taking about
10 32 percent of the moose harvest, but even with a higher
11 percentage of non-resident harvest total harvest is
12 still below available surplus.

13

14 Rescind the closures in Unit 22A would
15 allow non-Federally-qualified users to hunt moose on
16 Federal public lands during the entire State season.
17 Impacts to subsistence users are expected to be
18 minimal. Non-local residents' harvest average is only
19 about 5 percent and non-resident harvest about 27
20 percent, but there is no non-resident season in 22A
21 Unalakleet where most subsistence harvest occurs. In
22 22A north and 22A remainder closures were already
23 lifted during non-resident seasons so rescinding them
24 fully will not change harvest patterns. Since 2020
25 non-resident harvest has somewhat increased in 22A
26 remainder. The locals continue to take moose and the
27 remoteness of the area helps reduce user conflicts. In
28 22A north only one non-resident moose has been reported
29 harvested in the past three years. Most importantly
30 the moose population is healthy and increasing with
31 extremely high bull to cow ratios and no conservation
32 concerns. The conditions that originally justified
33 these closures no longer exist and the Board's closure
34 policy requires the closures be rescinded when the
35 conditions that justified them no longer exist.

36

37 Therefore it is OSM's recommendation to
38 support proposal WP26-54 so the closures are consistent
39 with Federal policy and harvest opportunity is
40 available to all users. And I would also like to point
41 out that action taken on this proposal may affect
42 action taken on the closure review that will be coming
43 up directly after this, WCR26-09B which is analyzing
44 the closure for Unit 22A Unalakleet.

45

46 And with that I'll be happy to answer
47 any questions.

48

49 CHAIRMAN CHRISTIANSON: Thank you. Any

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1 questions for the presentation.

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Rhonda.

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MS. PITKA: You mentioned the high bull to cow ratio and you said -- I didn't catch what the number was.

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MR. UBELAKER: Through the Chair, Member Pitka. The number I threw out was over 100 bulls to 100 cows and I believe the State is looking for a post harvest ratio of 30 bulls to 100 cows.

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MS. PITKA: My next question is you mentioned the population is extrapolated from the data by Unalakleet. Can you explain that a little bit further?

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MR. UBELAKER: Through the Chair, Member Pitka. My understanding ADF&G and Ben can definitely correct me if he knows better, they do one survey in Unit 22A and that is along the Unalakleet River in central 22A. There's not enough funding to cover all of Unit 22A which they would like to do, but they take those numbers, use that as kind of a canary in the coal mine and then through some sort of mathematical magic they transfer those numbers and look at trends on the north and south end of 22A.

30

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32

MR. MULLIGAN: I don't have anything more to add.

33

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MS. PITKA: Thank you. Thank you, Mr. Mulligan. That was going to be my next question is what was the mathematical magic?

37

38

39

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41

42

MR. MULLIGAN: We have biometricians who run those models to extrapolate that data. If you want to go down the rabbit hole I would be happy to hook you up with one of them and I'm sure you could spend a couple of weeks with that.

43

44

45

MS. PITKA: I think that would be very illustrative. Thank you. Thank you for the offer.

46

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My next -- my next question is that you mentioned that this hunt was closed to non-residents for a long time, but then also as justification you listed that non-residents didn't have much harvest so I

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1 was going to ask you to clarify that a little bit?

2

3 MR. UBELAKER: Through the Chair. To
4 which part are you referring, 22A north?

5

6 MS. PITKA: I think it was around
7 Unalakleet. You mentioned that there were -- that
8 there was very little non-resident harvest and also I
9 was a little bit confused and that's why I asked for
10 clarification because you also mentioned that the area
11 was closed to non-residents?

12

13 MR. UBELAKER: Yes, 22A Unalakleet has
14 been closed 2005 I believe it was closed to all harvest
15 by all users because of the population crash. As
16 population started increasing resident harvest was
17 allowed, but -- and that was only local Unalakleet
18 residents that were allowed to harvest. Non-resident
19 harvest has not -- there's no non-resident season in
20 22A Unalakleet to this day.

21

22 MS. PITKA: Thank you.

23

24 MR. UBELAKER: You're welcome.

25

26 CHAIRMAN CHRISTIANSON: Any other
27 questions.

28

29 (No comments)

30

31 CHAIRMAN CHRISTIANSON: Hearing and
32 seeing none, was there any public comment?

33

34 MR. UBELAKER: Mr. Chair, no public
35 comment was received.

36

37

38 CHAIRMAN CHRISTIANSON: Thank you. How
39 about summary of tribal government, Alaska Native
40 corporation.

41

42 MR. LIND: Thank you, Mr. Chair.
43 Orville Lind, Native Liaison. There were no comments
44 or resolutions on the proposal.

45

46 Thank you, Mr. Chair.

47

48 CHAIRMAN CHRISTIANSON: Thank you.
49 Tribal, Alaska Native organization testimony.

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1 (No comments)

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CHAIRMAN CHRISTIANSON: Hearing or seeing none, Advisory Group, SRC, State Advisory and multiagency work group.

MS. LAVINE: Thank you, Mr. Chair. There are none that I am aware of. If anyone online representing an advisory group or working group has comments or recommend -- to make please press star, five to raise your hand or raise your hand in Teams.

Thanks.

(No comments)

CHAIRMAN CHRISTIANSON: This is the opportunity for public to testify. To be recognized online raise your hand.

MS. LAVINE: Thank you, Mr. Chair. We have a Madeline Demaske.

MS. DEMASKE: Good afternoon. Can you guys hear me?

CHAIRMAN CHRISTIANSON: You have the floor.

MS. DEMASKE: Okay. Wonderful. Thank you, Mr. Chair and members of the Federal Subsistence Board. Hello. For the record my name is Madeline Demaske and I'm speaking on behalf of Safari Club International. We support rescinding the closure to moose hunting by non-Federally-qualified users in game management Unit 22A under Wildlife Proposal 26-54. Under Section .815 of the Alaska National Interest Lands Conservation Act commonly known as ANILCA the Board may close Federal public lands to non-subsistence hunting only when necessary for the conservation of healthy populations of fish and wildlife or if necessary to continue subsistence uses of such population. SCI fully understands and supports ANILCA's directive that subsistence use opportunity must be prioritized and that non-subsistence use may be limited if a conservation need exists. However the status of moose in this area does not require that non-subsistence hunting be restricted any further to protect the subsistence priority.

1 The closure in Unit 22A has been in
2 place for decades, but the biological conditions that
3 justified it have changed. Alaska Department of Fish
4 and Game's spring 2025 survey estimates that Unit 22A
5 has over 900 moose, well above the State's objective of
6 600 to 800 moose. Additionally 2021 and 2025 data show
7 bull to cow ratios are well above management
8 objectives. Even with an increased authorization in
9 2017, 2020 and 2024 harvest in Unit 22A central remains
10 well below the harvestable surplus meaning the moose
11 population can support additional harvest opportunity
12 by non-Federally-qualified users. It is this Board's
13 policy to reopen Federal public lands and waters as
14 soon as practical upon -- once the conditions that
15 originally justified the closure have changed to such
16 an extent that the closure is no longer necessary.
17 Based on current data there is no longer a conservation
18 concern in Unit 22A and subsistence uses can continue
19 while allowing a harvest opportunity for non-Federally-
20 qualified users. We respectfully urge the Board to
21 rescind the closure to moose hunting by non-Federally-
22 qualified users in game management Unit 22A under
23 Wildlife Proposal 26-54.

24
25 Thank you for the opportunity to
26 comment on this important proposal.

27
28 CHAIRMAN CHRISTIANSON: Thank you for
29 calling in, Madeline. Any other recognized testimony
30 online.

31
32 (No comments)

33
34 CHAIRMAN CHRISTIANSON: Hearing and
35 seeing none, we'll move on to Council recommendations.

36
37 MR. GREEN: Seward Peninsula RAC --
38 I'll read into the record the WP26-54, Unit 22A moose,
39 rescind the closure. The Council voted to support the
40 WP26-54 with a modification to maintain the closure in
41 the Unit 22A Unalakleet. The Council expressed
42 concerns about the harvest and hunting pressure
43 increasing in the closure is rescinded for the
44 Unalakleet area. They recognized there is currently no
45 State non-resident season, but fear one may be
46 established if the closure is lifted. The moose
47 population appears to be very healthy in the units 22A
48 north and 22A remainder. Competition for the non-
49 Federally-qualified users is low even after Federal
50

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1 lands reopened during the State season. Based on the
2 last two seasons the local residents have been able to
3 harvest what they need, their justification for the
4 original closure does not appear to exist anymore so
5 there's no reason to keep the closure in these two
6 subunits.

7

8 I think the feeling on the closure of
9 -- keeping 22A closed in the vicinity of the community
10 of Unalakleet is the access and the fear that the
11 access will enable non-qualified to overextend it.

12

13 The -- I hear numbers are extrapolated.
14 I didn't quite get what the base count was and then
15 what was extrapolated on top of that in 22, I just had
16 a question. I know I'm reading, but I'm.....

17

18 MR. UBELAKER: Through the Chair,
19 Chairman Green. The numbers for 22A Unalakleet are not
20 extrapolated, that's where the data.....

21

22 MR. GREEN: Okay.

23

24 MR. UBELAKER:comes from. The
25 estimate was almost 1,000 moose for the area and they
26 extrapolate those numbers to 22A north and 22A
27 remainder.

28

29 MR. GREEN: Thank you, Brian. And
30 that's all I have, Mr. Chair.

31

32 Thank you.

33

34 CHAIRMAN CHRISTIANSON: Thank you for
35 that. Yes, Jerry.

36

37 MR. INGERSOLL: Question. Did -- does
38 the Council have, you know, substantial evidence to --
39 I mean, I guess I'm asking for the basis of the request
40 to retain the closure for 22A Unalakleet. It sounded a
41 little bit like you were concerned that something may
42 happen. Can -- just go into that a little bit more.

43

44 MR. GREEN: I think that the concern is
45 that we'll -- it will happen because of the access and
46 the ability for people to access those lands in that
47 area. So that was the hesitation to -- or actually the
48 idea of the modification to keep it closed for a little
49 bit longer. Because, you know what, one of the things
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1 that we've seen over the years is that the people in
2 the Unalakleet area there they backed off, didn't hunt,
3 they went for several years without hunting on a
4 moratorium, they basically self imposed it. Well,
5 what's really interesting is that there's talk about
6 Unit 18 overflow and I guess for my personal thoughts
7 is that that overflow is actually going to bring moose
8 back over farther off to the northeast and start
9 reseeding places populations have fallen. So I guess
10 maybe that is where I might have voted on.

11

12 So thank you.

13

14 MR. INGERSOLL: Thank you.

15

16 CHAIRMAN CHRISTIANSON: Thank you.
17 That concludes our Regional Advisory Council
18 recommendation. We'll move on to Alaska Department of
19 Fish and Game.

20

21 MR. MULLIGAN: Thank you, Mr. Chair.
22 For the record the Alaska Department of Fish and Game
23 supports the proposal. It is ours. As I listened to
24 the testimony from the OSM analysis and from Ms.
25 Demaske I am having a hard time adding any extra
26 information that I had in my comments to that, but just
27 want to make the comment that the Unalakleet portion of
28 22A was the direct survey that is almost over 200
29 animals over the upper end of our objective. The bull,
30 cow ratio is more than enough to support the additional
31 harvest. There's ample moose on the landscape. And if
32 you look at the map I believe in a lot of the areas
33 regardless of the closure you're going to see places
34 close to the village are State lands anyway and so this
35 -- whether or not this would actually get folks maybe
36 farther away than if the closure stays in place because
37 then those Federal lands further up the drainage would
38 be open.

39

40 Other than that I have nothing more to
41 add than has already been pointed out to this Board.

42

43 Thank you.

44

45 CHAIRMAN CHRISTIANSON: Thank you, Ben.
46 Moving on, InterAgency Staff Committee comments.

47

48 MS. LAVINE: Thank you, Mr. Chair. The
49 Federal Subsistence Board will need to consider a few

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1 key sections of ANILCA before taking action on
2 proposals requesting closures and closure reviews.
3 Specifically those sections pertaining to Council
4 deference, Section .805(c) and those pertaining to
5 limitations to closures or restrictions of subsistence
6 and non-subsistence uses on Federal public lands in
7 Sections .815(3) and .816(b). These three sections
8 speak to the heart of Board authority and require a
9 careful balance between the Federal priority, the
10 continuation of subsistence uses, the necessary
11 conservation of subsistence fish and wildlife and
12 unnecessary restrictions. In the case of WP26-54 the
13 ISC suggests the Council recommendation to retain the
14 closure in Unit 22A may not meet the criteria for
15 deference.

16

17 Thank you, Mr. Chair.

18

19 CHAIRMAN CHRISTIANSON: Thank you.
20 Board discussion with Liaison, Council Chairs and State
21 reps. This is our opportunity to get further
22 clarification.

23

24 (No comments)

25

26 CHAIRMAN CHRISTIANSON: Hearing and
27 seeing none, we'll -- oh.

28

29 Rhonda.

30

31 MS. PITKA: Sorry. On page 1211
32 there's a reference to the ANS for moose is 250 to 300
33 animals. Do you have harvest information for that, for
34 Unit 22?

35

36 MR. UBELAKER: Through the Chair,
37 Member Pitka. I believe you're referring to the Alaska
38 Department of Fish and Game's comments on this. I
39 would defer to them because that is their -- ANS is
40 their number, not OSM.

41

42 MS. PITKA: Thank you.

43

44 MR. WOODS: Mr. Chair. Through the Mr.
45 Chair, I would like to ask the RAC the rationale. And
46 I see that unit.....

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48 CHAIRMAN CHRISTIANSON: Wait, Frank.

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1 MR. WOODS: Oh, I'm sorry.

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CHAIRMAN CHRISTIANSON: The State has the floor and they're answering a question. So sorry to cut you off, but, Ben, you do have the floor.

MR. MULLIGAN: Mr. Chairman, maybe let Member Woods ask his question of the RAC and I will get that harvest information pulled up.

CHAIRMAN CHRISTIANSON: Thank you. Frank, you have the floor.

MR. WOODS: So I'm looking at the map and you ask for keeping 22A Unalakleet closed. And then the remainder is still open I guess, but then the population estimates I'm trying to decipher the harvest objective for all of 22 is three to 680 moose and the last population in 2024 was 6,400 or 6,700, 6,700 moose. Is there a reason that 22A would be excluded from that 6,400 because there's no delineation of A, B and C, right, on that map. Or A north, A and then north remainder. And it's hard to -- as a Board Member hard to delineate the separation for that.

CHAIRMAN CHRISTIANSON: It says here that 22A Unalakleet River drainage population was 972 moose in 2025. So that's in the background from the Department of Fish and Game's number there. That's on 10 -- 1210. So that specific unit does have an answer in here.

MR. WOODS: Thanks for that, Mr. Chair. I've got it now. I was just reading the wrong page on the biological background and the last '24 estimate.

Thank you.

CHAIRMAN CHRISTIANSON: Okay. Thank you. Ben, you have the floor.

MR. MULLIGAN: Thank you, Mr. Chair. Through the Chair, Member Pitka. Yes, we are meeting ANS and the latest 2025 harvest was 315 animals.

CHAIRMAN CHRISTIANSON: Thank you. Any other questions from the Board for clarification, points of interest?

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1 (No comments)

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CHAIRMAN CHRISTIANSON: Hearing and seeing none we will now open up the floor for Board action.

MR. PENDERGAST: Mr. Chair.

CHAIRMAN CHRISTIANSON: You have the floor.

MR. PENDERGAST: Mr. Chair, Kevin Pendergast, BLM. I move to adopt Wildlife Proposal 26-54 to rescind all three moose hunting closures to non-Federally-qualified user on Federal public lands in Unit 22A. If I get a second I'll start the discussion by explaining why I intend to vote in support of my motion.

MR. STRIKER: NPS seconds.

MR. PENDERGAST: Thank you. The biological data suggests that the moose populations have increased as we've been hearing, this is a success story, lots of moose. There are harvestable surpluses in the three hunt areas. Meanwhile Federally-qualified subsistence users have reported being able to harvest and continue their subsistence uses of moose. Federally-qualified subsistence users have been particularly successful harvesting moose in the Unalakleet drainage hunt area where most of the moose harvest is by local residents. BLM acknowledges the Council's concerns that rescinding the closure to Federal lands in 22A, that portion of the Unalakleet drainage will lead to an increase in user conflict, you know, in the case the State were to open a hunt to non-residents, but at this time the moose population has increased to a level that there is a harvestable surplus and a closure to non-Federally-qualified users is no longer supported by data. So this is exactly where we hoped to get to with closures.

Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you, Kevin. Any further Board discussion, deliberation.

(No comments)

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1 CHAIRMAN CHRISTIANSON: Hearing none,
2 we'll do roll call. Read into the record the motion,
3 please.

4
5 MS. LEONETTI: Okay. The motion is to
6 adopt WP26-54 as written. Starting with BLM Member
7 Pendergast.

8
9 MR. PENDERGAST: Aye.

10
11 MS. LEONETTI: NPS Member Striker.

12
13 MR. STRIKER: NPS supports for the
14 reasons so well articulated by Director Pendergast.

15
16 MS. LEONETTI: Fish and Wildlife
17 Service Member Boario.

18
19 MS. BOARIO: Fish and Wildlife Service
20 supports.

21
22 MS. LEONETTI: BIA Member John.

23
24 MS. JOHN: BIA supports WP-26-54
25 without the Seward Peninsula Regional Advisory
26 Council's recommendation to exclude the area around
27 Unalakleet. We acknowledge their concerns about the
28 potential for increased sport hunting and possible
29 future impacts to subsistence users. Monitoring
30 harvests and activities will be important to determine
31 if this competition will affect rural residents and
32 warrant closing this area, this part of Unit 22A.

33
34 MS. LEONETTI: Forest Service Member
35 Ingersoll.

36
37 MR. INGERSOLL: Forest Service
38 supports. I think in a case where we are not -- where
39 we're not deferring to the RAC it's important to
40 articulate the reasons why not. And I'll say that the
41 RAC's recommendation to retain the closure for a
42 portion of 22A is based -- is not based on substantial
43 evidence in place today, it's a projection of what the
44 future may be. And if we get to a situation in the
45 future where a closure is warranted it could be brought
46 up at that time. And I think that we have an
47 obligation as a Board to reopen public access when the
48 conditions for the closure no longer apply. I think
49 this is a good news story and I appreciate the fact
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1 that people have managed the moose population so that
2 it is rebounded.

3

4 Thanks.

5

6 MS. LEONETTI: Public Member Pitka.

7

8 MS. PITKA: I vote to support WP26-54.
9 The Regional Advisory Council recommendation was not
10 supported by substantial evidence and it would be --
11 and because of the increase of the moose population
12 it's a good idea to reopen that area.

13

14 Thank you.

15

16 MS. LEONETTI: Public Member Oney.

17

18 MR. ONEY: Public Member Ray Oney moves
19 to support.

20

21 MS. LEONETTI: Public Member Woods.

22

23 MR. WOODS: Public Member Woods would
24 adopt and with the consideration acknowledge that the
25 RAC has recommendations that would also address
26 problems in the future and/or that are happening right
27 now. That we are -- I hope in two years we don't come
28 back and have to revisit the issues that are here. I
29 think it's -- we've already kind of whatever, address
30 those in previous comments and Board deliberation. And
31 I'd like to pass on to the RAC that we take their
32 recommendations seriously and if I had information on
33 how to separate the harvest numbers from the actual
34 population to delineate our goal is to open up for
35 subsistence and actual use of the land.

36

37 So thank you.

38

39 MS. LEONETTI: Public Member Payenna.

40

41 MR. PAYENNA: Yes, after hearing
42 comments and rationale by my fellow Board members I
43 vote to support WP26-54.

44

45 MS. LEONETTI: Chair Christianson.

46

47 CHAIRMAN CHRISTIANSON: Support as
48 reasons stated here. I think the -- it's good to hear
49 the populations of the area are above objectives and
50

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1 healthy enough for all users.

2

3 MS. LEONETTI: The motion to adopt
4 WP26-54 carries unanimously.

5

6 CHAIRMAN CHRISTIANSON: And make sure
7 somebody puts that in the news, is that what I heard?
8 A good talking point, we found alignment.

9

10 It looks like we adopted this one. The
11 next one on the agenda was related to this one and I
12 think that the review became moot by adopting this
13 proposal.

14

15 MR. PENDERGAST: Mr. Chair.

16

17 CHAIRMAN CHRISTIANSON: Kevin.

18

19 MR. PENDERGAST: Kevin Pendergast, BLM.
20 That's my understanding is the proposal's moot so I
21 would urge that we not go through the whole process of
22 the review, but I'm happy to make a motion to deal with
23 it for the record.

24

25 CHAIRMAN CHRISTIANSON: Thank you.

26

27 MR. PENDERGAST: Mr. Chair, I move to
28 take no action on closure review WCR-26-09B. If I get
29 a second I will open the discussion by explaining why I
30 intend to support my motion.

31

32 MR. WOODS: Second.

33

34 MR. STRIKER: Park Service seconds.

35

36 MR. PENDERGAST: Thank you. This
37 closure was rescinded in proposal WP26-54 just now so
38 there's no reason to act on it again.

39

40 Thank you, Mr. Chair.

41

42 CHAIRMAN CHRISTIANSON: Thank you. We
43 appreciate that. Here we are, any Board discussion,
44 deliberation.

45

46 (No comments)

47

48 CHAIRMAN CHRISTIANSON: Roll call.
49 Well, any opposition to the motion to take no action on
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1 this one.

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(No comments)

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CHAIRMAN CHRISTIANSON: Hearing no Board objection, motion carries unanimous to take no action on W26-09B.

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And we'll move on to the next one, WCR26-11/12, Unit 22B moose.

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MR. UBELAKER: Thank you, Mr. Chair. For the record still Brian Ubelaker. And I will be presenting a brief summary of wildlife closure review WCR26-11 and 12 regarding moose in Unit 22B. And this analysis can be found beginning on page 1271 of your meeting materials.

Wildlife closure review 26-11 examines the fall season closure of moose hunting for non-Federally-qualified users and WCR26-12 reviews the winter season closure which allows hunting only by residents of White Mountain and Golovin both in Unit 22B. Federal public lands in Unit 22B west were closed by the Federal Subsistence Board through the adoption of WP02-34 due to conservation concerns for declining moose populations and to ensure Federally-qualified subsistence users had priority access. The Board shortened moose seasons, limited harvest to bulls only and restricted harvest to Federally-qualified subsistence users. These measures aim to protect cows and improve calf survivability. Subsequently WP02-35, a Section .804 analysis further restricted harvest to residents within certain units, specifically the Unit 22B winter hunt was limited to local residents. The Board determined that restricting harvest to a subset of Federally-qualified users would improve subsistence opportunities for those most dependent on moose.

Moose populations in Unit 22B have historically been limited by habitat conditions, predation and periodic severe winters. As a result moose occur in relatively low densities across much of 22B although some localized areas support higher concentrations. Aerial surveys and trend counts conducted by ADF&G suggest that the moose population in 22B has remained stable to slightly increasing in recent years. Calf recruitment has been low, but

1 generally adequate to maintain population stability.
2 Bull to cow ratios have consistently been high, often
3 exceeding 40 to 50 bulls per 100 cows indicating that
4 the population is not limited by harvest and that
5 surplus bulls are available. These ratios are well
6 above State management objectives and suggest that
7 hunting pressure is relatively low compared to
8 population potential.

9
10 Harvest in 22B is dominated by
11 Federally-qualified subsistence users from nearby
12 communities such as White Mountain, Golovin, Elim and
13 Nome. Reported harvest by local residents has remained
14 relatively low in absolute numbers, but is important
15 for food security in these communities. Moose are a
16 preferred source of red meat and harvest opportunity is
17 closely tied to fall weather, river access and hunting
18 conditions. Non-local resident harvest in 22B has
19 historically been minimal, averaging less than 5
20 percent of the total reported harvest in the past
21 decade. Non-resident harvest is also low typically due
22 to limited access, absence of guide activity in some
23 areas and relatively low moose densities compared to
24 other units. In some years no non-local or non-
25 resident harvest has been recorded at all.

26
27 Conservation concerns that led to prior
28 restrictions in 22B were primarily related to low
29 population densities and the risk of localized
30 overharvest. However current biological data do not
31 indicate population declines. The relatively high bull
32 to cow ratios and stable to increasing population trend
33 suggest that the population is capable of sustaining
34 continued harvest at current levels. One alternative
35 considered was to eliminate the fall season closure.
36 Although Federally-qualified subsistence users
37 currently harvest about 93 percent of the moose in Unit
38 22B west indicating minimal impact on subsistence, OSM
39 did not pursue this alternative because the moose
40 population remains below management objectives, calf to
41 cow ratios are low and quotas are quickly met showing
42 demand far exceeds supply.

43
44 Rescinding the closures in 22B west
45 would allow non-Federally-qualified users to harvest
46 moose on Federal public lands. Although the moose
47 population is stable or slightly increasing it remains
48 below State management objectives with low calf to cow
49 ratios and limited growth potential. Seasons often
50

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1 close early as quotas are quickly met showing that
2 demand exceeds supply. Rescinding or modifying
3 closures would likely result in minimal additional
4 harvest, but Federally-qualified subsistence users
5 could face increased competition particularly during
6 the fall season from non-local hunters and during
7 winter season from other Federally-qualified users
8 including residents of Nome. The winter hunt is
9 especially critical for White Mountain and Golovin as
10 some years see all their moose harvested during this
11 season.

12
13 Therefore OSM's preliminary conclusion
14 is to retain the status quo. The moose population west
15 of the Darby Mountains remains below management
16 objectives with low recruitment. Quotas are met
17 quickly indicating demand exceeds supply. Maintaining
18 closures ensures the conservation of the moose
19 population and protects subsistence opportunities for
20 Federally-qualified users including keeping the winter
21 hunt limited to residents of White Mountain and
22 Golovin.

23
24 With that I'm happy to answer
25 questions.

26
27 CHAIRMAN CHRISTIANSON: Thank you,
28 Brian. Any questions for Staff.

29
30 (No comments)

31
32 CHAIRMAN CHRISTIANSON: Any written
33 comment.

34
35 MR. UBELAKER: Mr. Chair, none were
36 submitted.

37
38 CHAIRMAN CHRISTIANSON: Thank you. Was
39 there a summary of tribal government and Alaska Native
40 corporation consultation.

41
42 MR. LIND: Thank you, Mr. Chair.
43 Orville Lind. No, there were no comments or
44 resolutions on this proposal.

45
46 Thank you, Mr. Chair.

47
48 CHAIRMAN CHRISTIANSON: Thank you.
49 Tribal, Alaska Native organization testimony.

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1 (No comments)

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CHAIRMAN CHRISTIANSON: Hearing or
4 seeing none, we'll go to Advisory Group, SRC, State
5 Advisory and multiagency groups.

6

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MS. LAVINE: Thank you, Mr. Chair. No
8 comments were submitted that I am aware of. If there
9 is anyone representing an AC or SRC or working group
10 online that would like to provide comments now you can
11 do so by raising your hand or pressing star, five.

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(No comments)

CHAIRMAN CHRISTIANSON: Hearing or
seeing none, is there any public testimony here in the
building or online, raise your hand?

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MR. GREEN: I was reading. The Council
recommendations on WCR26-11/12, Unit 22B moose, the
Council voted to retain the status quo. Rescinding the
closure would increase competition on Federal public
lands as this area's harvest quota is quickly reached
every year. Keeping the Federal lands closed will
maintain opportunity for Federally-qualified
subsistence users. Additionally the moose population
is below management objectives raising the conservation
concerns.

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That's it. Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you.
Alaska Department of Fish and Game comments.

MR. MULLIGAN: Thank you, Mr. Chair.
For the record the Alaska Department of Fish and Game
supports rescission of this closure. One thing I would
like to point out first is that in this regard yes, the
numbers are the numbers, but the Board of Game has
taken thorough action to make sure the protection of
local harvest is in place if you -- well, in our
regulations we've -- it's a registration hunt for both

1 the fall and winter and if -- it'll be noted that a
2 person needs to be in those villages in person during a
3 set amount of time before the hunt. That would be for
4 the fall hunt it's July 25th through August 25th to be
5 there and then to come back for the hunt. In the
6 winter it is just given out -- well, sorry, let me
7 start over. In the fall you'd have to be in Brevig
8 Mission, Golovin, Nome, Teller and White Mountain
9 during that time in order to obtain a registration
10 permit. For the winter hunt you would have to be in
11 White Mountain or Golovin beginning December 1st.

12

13 So the State feels that it has taken
14 action and is capable of providing this mechanism to
15 maintain local harvest so that they can fill their
16 subsistence needs without having competition from
17 Alaska residents outside the area. It's closed to non-
18 residents and so we feel that we've had the -- we've
19 taken that action and we're fully capable of providing
20 that opportunity.

21

22 Thank you.

23

24 CHAIRMAN CHRISTIANSON: Thank you for
25 those steps. Appreciate that. InterAgency Staff
26 Committee.

27

28 MS. LAVINE: Thank you, Mr. Chair. The
29 Board will need to consider a few key sections of
30 ANILCA before taking action on proposals requesting
31 closures and closure reviews. Specifically those
32 sections pertaining to Council deference which is
33 Section .805(c) and those pertaining to limitations to
34 closures or restrictions of subsistence and non-
35 subsistence uses on Federal public lands and those are
36 found in Sections .815(3) and .816(b). These three
37 sections speak to the heart of Board authority and
38 require a careful balance between the Federal priority,
39 the continuation of subsistence uses, the necessary
40 conservation of subsistence fish and wildlife and
41 unnecessary restrictions. In the case of WCR26-11/12
42 there are clear conservation concerns with the moose
43 population below management objective. The ISC
44 suggests the Council's recommendation to retain the
45 closure in Unit 22B may meet the criteria for
46 deference.

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48 Thank you, Mr. Chair.

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1 CHAIRMAN CHRISTIANSON: Thank you,
2 Robbin. Board discussion with Liaison, Counsel Chair,
3 State representative, our opportunity to get
4 clarification before we make a motion.

5
6 (No comments)

7
8 CHAIRMAN CHRISTIANSON: Hearing and
9 seeing none we'll open the floor for a motion on WCR26-
10 11/12.

11
12 MR. PENDERGAST: Mr. Chair.

13
14 CHAIRMAN CHRISTIANSON: Yes, you have
15 the floor.

16
17 MR. PENDERGAST: Kevin Pendergast, BLM.
18 Mr. Chair, I move to rescind both closures described by
19 WCR26-11 and 26-12. If I get a second I will open the
20 discussion by explaining why I intend to vote in
21 support of my motion.

22
23 MR. STRIKER: NPS seconds.

24
25 MR. PENDERGAST: Thank you. And before
26 I get into my rationale I want folks to know I spent a
27 lot of time with this, I don't take the issue of not
28 going along with RAC deference lightly and I also don't
29 -- I pay a lot of attention to the fact that this is
30 moose in an area that's partly road accessible from
31 Nome and has a lot of eyes on it. That said I think
32 the burden for us to retain a closure is the same as it
33 is to put a closure in place in the first place. We
34 need to be really careful about thinking about what the
35 intent is and what the data are to support it. In this
36 case I look really at kind of what the data says for
37 the area and it's true that Unit 22B west has a low
38 moose population and a high demand for moose as we've
39 heard. And the population's slowly growing, but
40 remains below State objectives. For that reason these
41 hunts have been carefully managed by quotas as we've
42 heard. They often close within a week. Data shows
43 that Federally-qualified subsistence users and this is
44 important, Federally-qualified subsistence users
45 harvest more than 93 percent of the moose from this
46 unit in an area which is only 28 percent Federal public
47 lands. Non-Federally-qualified users harvest a very
48 limited number of moose from this unit. Our OSM
49 analysis indicates that elimination of this closure
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1 would not affect continuation of subsistence uses.

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3 I understand the Seward Peninsula RAC's
4 concerns for the moose in this region and for
5 Federally-qualified subsistence users reliance on moose
6 for subsistence uses is extremely important, however
7 the data suggests these two closures specifically are
8 not providing Federally-qualified users with a
9 meaningful preference for the subsistence uses of moose
10 and that rescinding these closures will not further
11 impact the moose population in the unit and will not
12 impact Federally-qualified subsistence users continued
13 subsistence uses of moose.

14

15 That's what the data says so for those
16 reasons I support rescinding these closures.

17

18 CHAIRMAN CHRISTIANSON: The floor is
19 open for discussion.

20

21 (No comments)

22

23 CHAIRMAN CHRISTIANSON: We have before
24 us a motion to rescind the closure. Hearing or seeing
25 no discussion go to roll call.

26

27 MS. LEONETTI: Okay. The motion is to
28 rescind the closures on WCR26-11 and 12. Starting with
29 BLM Member Pendergast.

30

31 MR. PENDERGAST: Support.

32

33 MS. LEONETTI: Public Member Pitka.

34

35 MS. PITKA: I oppose rescinding the
36 closure because doing so would be detrimental to the
37 conservation of healthy moose populations and the clear
38 conservations listed within the analysis.

39

40 Thank you.

41

42 MS. LEONETTI: Fish and Wildlife
43 Service Member Boario.

44

45 MS. BOARIO: Fish and Wildlife Service
46 votes to oppose the motion and to retain the status quo
47 because the moose population is below management
48 objectives and recruitment is low. Demand for moose is
49 high and this will ensure subsistence opportunities for
50

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1 Federally-qualified users.

2

3 Thank you.

4

5 MS. LEONETTI: BIA Member John.

6

7 MS. JOHN: BIA votes to maintain
8 closure in WCR26-11/12 as recommended and justified by
9 the Seward Peninsula RAC. The moose population is
10 below management objectives and raises conservation
11 concerns.

12

13 CHAIRMAN CHRISTIANSON: So for the
14 record you're voting in the negative or positive?

15

16 MS. JOHN: Negative.

17

18 CHAIRMAN CHRISTIANSON: Thank you.

19

20 MS. LEONETTI: Thank you. Public
21 Member Oney.

22

23 MR. ONEY: Public Member Ray Oney moves
24 to oppose as stated by Rhonda.

25

26 MS. LEONETTI: Public Member Woods.

27

28 MR. WOODS: Public Member Woods opposes
29 26-11/12, that Unit B west moose population is still
30 below management objectives and calf, cow ratios are
31 very low. Additional quotas are quickly met and
32 seasons typically close early and also the RAC's
33 recommendation.

34

35 Thank you.

36

37 MS. LEONETTI: Just to be clear you
38 want to retain the closure?

39

40 MR. WOODS: Yes.

41

42 MS. LEONETTI: Okay. Thank you.
43 Public Member Payenna.

44

45 MR. PAYENNA: I would agree with my
46 fellow public members and with our RAC and vote to
47 oppose WCR26-11/12.

48

49 MS. LEONETTI: NPS Member Striker.

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1 MR. STRIKER: I support the motion for
2 the reasons so carefully articulated and with the same
3 reservations so thoroughly expressed by Director
4 Pendergast.

5
6 MS. LEONETTI: Forest Service Member
7 Ingersoll.

8
9 MR. INGERSOLL: Forest Service opposes
10 the motion in deference to the RAC and the RAC's
11 recommendation here. I think the Council is entitled
12 to deference, there is a conservation concern and the
13 closure is necessary to continue subsistence use.

14
15 MS. LEONETTI: Chair Christianson.

16
17 CHAIRMAN CHRISTIANSON: Let's see, I
18 got caught off after liste -- I vote to oppose and
19 based on the justification Jerry so elegantly put on
20 the record.

21
22 Thank you.

23
24 MS. LEONETTI: Mr. Chair, the motion to
25 adopt or to rescind the closure fails eight to two.

26
27 CHAIRMAN CHRISTIANSON: Thank you.
28 We'll take a five minute break. We'll come back and
29 try to get one or two more done and call it a day,
30 guys.

31
32 (Off record)

33
34 (On record)

35
36 CHAIRMAN CHRISTIANSON: Next up as
37 everyone's seating we've got WCR26-13/14/15.

38
39 MR. UBELAKER: Thank you, Mr. Chair.
40 For the record Brian Ubelaker. And these closure
41 reviews, 26-13, 14 and 15 all deal with moose in Unit
42 22D. And this analysis can be found starting on page
43 1283 in the meeting materials.

44
45 The analysis of wildlife closure
46 reviews WCR26-13, 14 and 15 evaluate Federal
47 subsistence closures to moose hunting in Unit 22D.
48 WCR26-13 and 14 address closures in Unit 22D Kuzitrin
49 and Unit 22D southwest allowing only residents of units
50

1 22C and 22D to hunt. While WCR 26-15 addresses the
2 remainder of Unit 22D allowing only Federally-qualified
3 subsistence users.

4
5 Regulations regarding moose management
6 in Unit 22D have recently focused on conserving the
7 herd while supporting subsistence hunting. To this
8 point Federal public lands in units 22D Kuzitrin and
9 22D southwest were closed through action taken on
10 Wildlife Proposal 02-34 to address declining moose
11 populations and ensure Federally-qualified subsistence
12 users had priority access. WP02-35 further limited
13 harvest to local residents within some units to improve
14 subsistence opportunities to those most dependent on
15 moose. By 2007 the moose population had recovered
16 enough to reopen Unit 22D remainder. Actions taken
17 from 2016 through 2018 further protected larger
18 breeding bulls by establishing antlered only hunts and
19 closing cow harvest to protect the breeding portion of
20 the population. But in 2020 due to declining
21 populations and unsustainable harvest Federal and State
22 regulations were aligned with may be announced moose
23 seasons. As well as adoption of WP20-40 which
24 reestablished the closure in Unit 22D remainder to all
25 but Federally-qualified subsistence users. Today
26 closures and quotas remain in place in all three areas
27 because moose populations are below management
28 objectives.

29
30 Currently the moose population in Unit
31 22D is below management objectives. Bull to cow ratios
32 are near the target, but fluctuate and calf to cow
33 ratios suggest stable conditions in some areas and
34 declining trends in others. Predation is believed to
35 be a key factor limiting population growth. Overall
36 current conditions indicate a stable, but low moose
37 population with limited surplus for winter hunting.

38
39 Subsistence harvest is mostly
40 concentrated in the fall with residents of Unit 22D and
41 nearby areas taking the majority of moose. Winter
42 hunting opportunities are limited because harvest
43 quotas are typically met during the fall season.
44 Federal permits for the winter hunt have rarely been
45 used while State registration permits manage most
46 harvest. Recent seasons have closed early as quotas
47 are reached quickly highlighting the need to carefully
48 manage harvest to maintain population stability and
49 protect breeding age bulls.

1 Rescinding the closures in Unit 22D
2 would allow all users to harvest moose on Federal
3 public lands in all seasons. However non-resident
4 seasons are already closed under State regulations and
5 resident harvest is managed by registration permits and
6 quotas. So total harvest would not increase.
7 Conservation concerns remain as quotas are often met
8 quickly and State and Federal seasons sometimes close
9 early. For example the 2024, Unit 22D Kuzitrin, 22D
10 southwest hunt was open only three days before the
11 quota was reached. Lifting the closures could reduce
12 opportunities for Federally-qualified subsistence users
13 due to increased competition though few local -- non-
14 local hunters currently participate. Retaining the
15 closures keeps Federal public lands in Unit 22
16 remainder closed to non-Federally-qualified users and
17 Unit 22D Kuzitrin and 22D southwest closed to anyone
18 outside units 22C and 22D. While most harvest is
19 already by Federally-qualified users and State quota
20 systems protect the population closures ensure
21 continued subsistence priority without competition from
22 non-local users.

23
24 Therefore it is OSM's conclusion to
25 retain the status quo. Unit 22D moose population and
26 bull to cow ratios remain below management objectives.
27 Demand exceeds supply as quotas are quickly met.
28 Maintaining closures conserves the population and
29 ensures Federally-qualified subsistence users have
30 priority access minimizing competition from non-local
31 residents.

32
33 And with that I'll be happy to answer
34 any questions.

35
36 CHAIRMAN CHRISTIANSON: Thank you,
37 Brian. Any questions for Brian.

38
39 (No comments)

40
41 CHAIRMAN CHRISTIANSON: Did we receive
42 any public testimony written.

43
44 MR. UBELAKER: Mr. Chair. No, we did
45 not.

46
47 CHAIRMAN CHRISTIANSON: Thank you for
48 that. Summary of tribal government and Alaska Native
49 corporation and consultation.

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1 MR. LIND: Thank you, Mr. Chair. There
2 were no comments or resolutions.

3
4 Thank you.

5
6 CHAIRMAN CHRISTIANSON: Thank you. Any
7 tribal, Alaska Native organizational testimony.

8
9 (No comments)

10
11 CHAIRMAN CHRISTIANSON: Hearing or
12 seeing none, Advisory Group testimony, SRC, State
13 Advisory or multiagency working group.

14
15 MS. LAVINE: Thank you, Mr. Chair. We
16 received no comments that I'm aware of.

17
18 CHAIRMAN CHRISTIANSON: Any public
19 testimony here or online please raise your hand in the
20 queue.

21
22 (No comments)

23
24 CHAIRMAN CHRISTIANSON: Hearing or
25 seeing none, Council recommendations.

26
27 MR. GREEN: Mr. Chair.

28
29 CHAIRMAN CHRISTIANSON: Louis.

30
31 MR. GREEN: The Seward Peninsula
32 Regional Advisory Council provided justifications for
33 26-13 and 14, Unit 22D moose. The Council voted to
34 retain the status quo of WCR26-13 and 14. This is a
35 conservation concern for moose in Unit 22D and little
36 is known about the movements between 22D and 22E. As a
37 result Federal public lands should be limited to
38 Federally-qualified subsistence users to prioritize
39 their harvest opportunity.

40
41 The -- also follows with WCR26-15, Unit
42 22D moose. The Council voted to retain the status quo
43 for WCR26-15. In addition to our justification for
44 retaining the status quo of WCR26-13 and 14 the Council
45 also stated that the Unit 22D remainder is heavily used
46 by Nome residents on the road system and most harvest
47 quota is taken by these hunters leaving little
48 opportunity for residents of Brevig Mission to harvest
49 moose.

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0300

1 That's all I have, Mr. Chair. Thank
2 you.

3
4 CHAIRMAN CHRISTIANSON: Thank you,
5 Louis. Next we have the Alaska Department of Fish and
6 Game.

7
8 MR. MULLIGAN: Thank you, Mr. Chair.
9 For the record the Alaska Department of Fish and Game
10 supports rescission of the closure. Similar to the prior
11 one yes, looking at the latest numbers we are below
12 objective, but our bull to cow ratio. And in this
13 regard similar to my justification under 12/13, the
14 State through the Board of Game and the Department has
15 taken what we would call thorough action in order to
16 reduce participation except for those by local units.
17 Similar we have registration hunts in place where
18 outside of the hunt time you would have to register at
19 one of the local communities in order to participate in
20 that hunt. So it's not like you could go into that
21 community, get one and then automatically go hunting
22 there. You'd have to come back and forth twice into
23 the region in order to hunt so we believe that reduces
24 the amount of non-Federally-qualified users in this
25 regard that would participate and we see those number
26 and similar to last time we have 87 percent Federally-
27 qualified users harvesting moose in that area.

28
29 Thank you, Mr. Chair.

30
31 CHAIRMAN CHRISTIANSON: Thank you, Ben.
32 InterAgency Staff Committee.

33
34 MS. LAVINE: Thank you, Mr. Chair. The
35 Board will need to consider those sections of ANILCA
36 pertaining to Council deference which is Section
37 .805(c), those pertaining to limitations to closures or
38 restrictions of subsistence and non-subsistence uses on
39 Federal public lands in Sections .815(3) and .816(b).
40 These three sections speak to the heart of Board
41 authority and require a careful balance between the
42 Federal priority, the continuation of subsistence uses,
43 the necessary conservation of subsistence fish and
44 wildlife and unnecessary restrictions. In the case of
45 WCR26-13, 14, 15 there are clear conservation concerns
46 with the moose population below management objectives.
47 The ISC suggests that the Council's recommendation to
48 retain the closures in Unit 22D may meet the criteria
49 for deference.

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1 Thank you, Mr. Chair.

2

3 CHAIRMAN CHRISTIANSON: Thank you.
4 Board discussion with Liaison, Council Chair and State
5 reps, any clarification needed, questions.

6

7 (No comments)

8

9 CHAIRMAN CHRISTIANSON: Seeing and
10 hearing none, we'll open up the floor for Board action.

11

12 MR. PENDERGAST: Mr. Chair.

13

14 CHAIRMAN CHRISTIANSON: You have the
15 floor, Kevin.

16

17 MR. PENDERGAST: Mr. Chair, I move --
18 Kevin Pendergast, BLM. I move to rescind three
19 closures described by WCR26-13, 14 and 15. If I get a
20 second I will explain why I intend to vote to support
21 my motion.

22

23 MR. STRIKER: Second.

24

25 MR. PENDERGAST: Thank you. And for
26 the record I'll start again by saying I spent a lot of
27 time with this proposal. I'm not anti-closure in
28 general, but I'll just note again that it's about the
29 most blunt tool that we have. This closure's been in
30 place for about a quarter of a century and at some
31 point these become de facto permanent closures. So
32 again I think it's incumbent on us to really look at
33 the data and whether or not the closure is the
34 mechanism that is kind of accomplishing the intended
35 objective here. So that's what underpins my motion.

36

37 Much like the other hunt areas in Unit
38 22 it is true that Unit 22 delta has a low moose
39 population and a high demand for moose. And that the
40 moose population has appeared to be trending downward
41 and remains below State management objectives. For
42 that reason again all three hunts have been carefully
43 managed by quota and often close within two weeks.
44 Data shows that Federally-qualified users harvest most,
45 nearly 90 percent of moose in all three hunts across a
46 unit that is only 23 percent Federal public land. Non-
47 Federally-qualified subsistence users harvest very few
48 moose here. So again in a quarter century of closures
49 it's clear that the closure is not what's accomplishing
50

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1 any management objective here.

2

3

4 I understand the Seward Peninsula RAC's
5 concerns for moose in this region and again I have
6 respect for deference to the RAC, but in this case it
7 just doesn't seem to be supported by substantial
8 information or whatever the correct term is. And I
9 understand and support their concern for subsistence
10 users' reliance on moose for subsistence uses. However
11 the data again suggests these closures specifically are
12 not providing Federally-qualified subsistence users
13 with a meaningful preference and that rescinding these
14 closures, 13, 14 and 15, will not further impact the
15 moose population in Unit 22D and will not impact
16 Federally-qualified subsistence users' continued
17 subsistence uses of moose. So while it's easy for me
18 as a Board Member to say retain the closure, there's
19 nothing here to indicate that that is going to make any
20 difference and that it is accomplishing the intended
21 objective.

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And I'll just again note because I think this is important for there to be a non-resident uptick or non-resident season is closed, but for an Alaska resident to obtain a permit they have to do it in person in Brevig Mission, Golovin, Nome, Teller or White Mountain. So a non-Federally-qualified subsistence user, so to see an uptick in that group, they'd have to travel there before the hunt to get a permit and that reduces the potential for the number of non-Federally-qualified users so the potential for that number to increase. But really just focusing in on whether or not the closure is accomplishing an intended objective and the data here indicates that it's just not.

Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you. The floor is open for discussion.

MR. WOODS: Board deliberation, public Member Woods. The public responsibility of this Council and Board is to protect subsistence use and resource for that along with the OSM's recommendation of retain status quo of closing, conservation concerns exist in Unit 22D for the moose populations which is below management objective. I know it's a burden administratively, but on the positive side, you know,

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1 the State requires reauthorization of antlerless hunts
2 every year, that's even worse than this right here. In
3 order to operate on a positive to allow on a State side
4 antlerless hunts we have to reauthorize that every
5 year. That said voting down this would also protect
6 the resource on a low return, looks like bull to cow
7 ratios are low, the population might have been decades,
8 but this is just a formality to keep protection of the
9 resource that needs to be saved for the subsistence
10 users that 90 percent I think was the number of the
11 harvested off of 23 percent land and that's why I'll
12 vote yes on retaining or no, I'm sorry, on voting this
13 down.

14

15 So thank you.

16

17 CHAIRMAN CHRISTIANSON: Any other Board
18 discussion, deliberation.

19

20 (No comments)

21

22 CHAIRMAN CHRISTIANSON: Motion on the
23 floor to rescind the closure. Hearing none, we'll go
24 to read the record -- the motion and roll call, please.

25

26 MS. LEONETTI: Okay. The motion is to
27 rescind the closure on WCR26-13, 14 and 15.

28

29 BLM Member Pendergast.

30

31 MR. PENDERGAST: Support.

32

33 MS. LEONETTI: Public Member Pitka.

34

35 MS. PITKA: I oppose rescinding the
36 closure because of the extreme conservation concerns
37 and the -- and being below management objectives.

38

39 Thank you.

40

41 MS. LEONETTI: Fish and Wildlife
42 Service Member Boario.

43

44 MS. BOARIO: Fish and Wildlife Service
45 votes to oppose the motion and votes to retain the
46 status quo in deference to the Seward Peninsula Council
47 and its on the ground knowledge of local conditions.
48 Conservation concerns exist and the moose population is
49 below management objectives in this area which is a
50

0304

1 critical piece of evidence.

2

3

Thank you.

4

5

MS. LEONETTI: BIA Member John.

6

7

8 MS. JOHN: BIA votes to oppose the
9 motion in order to maintain the closures in WCR 13, 14
10 and 15 and to maintaining the existing moose hunting
11 closure for Unit 22D as recommended by and in deference
12 to the Seward Peninsula RAC.

12

13

MS. LEONETTI: Public Member Oney.

14

15

16 MR. ONEY: Public Member Ray Oney moves
17 to oppose WCR26-13, 14 and 15.

17

18

MS. LEONETTI: Public Member Woods.

19

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23

24

Thank you.

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MS. LEONETTI: Public Member Payenna.

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MR. INGERSOLL: Forest Service votes to
oppose. I believe that the RAC is entitled to
deference unless they made a clear error here. I also
want to acknowledge though the work that the Department
of Fish and Game is doing to protect the resource and
the use regardless. Their actions are also in service
to the local users. And I believe that there is a
documented conservation concern, there's a documented
demand that exceeds supply and it's our duty to support

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1 the subsistence preference.

2

3

MS. LEONETTI: Chair Christianson.

4

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CHAIRMAN CHRISTIANSON: I oppose as stated on the record here and in deference to the RAC.

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11

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Thank you.

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CHAIRMAN CHRISTIANSON: Thank you. We'll go ahead and move on to WP26-61.

MR. UBELAKER: Thank you, Mr. Chair. Brian Ubelaker for the record. WP26-61 is in regards to moose in Unit 22 and the analysis can be found on page 1213 of your meeting materials.

This proposal submitted by the Seward Peninsula Subsistence Regional Advisory Council requests to establish a Federal registration permit for moose in Unit 22E. The proponent states requiring a Federal registration permit will allow for greater harvest data to be collected improving management of this moose population.

Regulatory changes include Federal lands in Unit 22E being closed to non-Federally-qualified users to address declining moose numbers in 2002. Since then the closure has been repeatedly reviewed as populations change. This Board has considered extending seasons, adjusting harvest limits and at times explored rescinding the closure though concerns about adjacent Unit 22D's weaker moose numbers have limited action and the closure currently remains in place. State regulations have also evolved over the last 20 years including the introduction of winter resident hunts, shortening seasons, restricting harvest to antlered bulls and eventually shifting the non-resident hunt to a drawing system to reduce competition.

Biological data indicate moose numbers in Unit 22E remain relatively low compared to other parts of the region and the herd is currently below State management objectives. The population shows

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1 signs of stability, but it's highly sensitive to
2 factors like predation, severe weather and limited
3 winter habitat. Bull to cow ratios are adequate to
4 support a conservative hunt though the number of
5 surplus bulls available is limited. Calf survival
6 rates indicate that recruitment is occurring, but not
7 at a level that would allow for large harvests.

8
9 Overall harvest pressure is low and
10 reported harvest is a small fraction of the total
11 population. Most harvest comes from local subsistence
12 users who rely on moose as an important source of meat.
13 There is very little non-local participation in this
14 hunt due to closures and restrictions that are in
15 place. However accurate reporting remains a challenge
16 which makes it difficult for managers to fully assess
17 harvest impacts.

18
19 Adopting WP26-61 would require a
20 Federal registration permit for moose hunting in Unit
21 22E. For subsistence hunters this would mean an extra
22 step, obtaining a Federal permit instead of a harvest
23 ticket, but it would provide much better harvest
24 reporting. Improved data would give managers the
25 information needed to track harvest more accurately and
26 make informed decisions about conservation and
27 opportunity. No direct impact to the moose population
28 is expected immediately, but in the long term better
29 reporting and management flexibility would benefit both
30 the herd and subsistence users.

31
32 Therefore OSM's conclusion is to
33 support the proposal with modification, to delegate
34 authority to the Bering Land Bridge National Preserve
35 superintendent, to set quotas, determine permit numbers
36 and close the season in coordination with State
37 managers. The moose population in Unit 22E is stable,
38 but below State objectives with limited surplus for
39 harvest. Subsistence users depend on these moose and
40 accurate data is needed to ensure sustainable
41 management. Adopting this proposal would improve
42 reporting, provide management flexibility through in-
43 season management and continue to prioritize
44 conservation while supporting rural subsistence needs.

45
46 And with that I will be happy to take
47 questions.

48
49 CHAIRMAN CHRISTIANSON: Thank you,
50

0307

1 Brian. Any questions from the Board for Staff.

2

3 (No comments)

4

5 CHAIRMAN CHRISTIANSON: Hearing and
6 seeing none, any written public comment on this.

7

8 MR. UBELAKER: No, Mr. Chair.

9

10 CHAIRMAN CHRISTIANSON: Thank you.
11 Summary of tribal government and Alaska Native
12 corporation.

13

14 MR. LIND: Thank you, Mr. Chair. There
15 were no comments on this proposal.

16

17 Thank you.

18

19 CHAIRMAN CHRISTIANSON: Thank you.
20 Tribal, Alaska Native organization testimony.

21

22 (No comments)

23

24 CHAIRMAN CHRISTIANSON: Hearing and
25 seeing none, Advisory Group, SRC, State Advisory and
26 multiagency working group.

27

28 MS. LAVINE: Thank you, Mr. Chair.
29 There were no comments that I know of. If anyone
30 online represents any of these groups and would like to
31 speak up you can do so by raising your hand.

32

33 (No comments)

34

35 CHAIRMAN CHRISTIANSON: Hearing and
36 seeing none, any public testimony online or in the
37 building.

38

39 (No comments)

40

41 CHAIRMAN CHRISTIANSON: Seeing and
42 hearing none, Council recommendation.

43

44 Louis.

45

46 MR. GREEN: Thank you, Mr. Chair.
47 Seward Peninsula Regional Advisory Council has -- the
48 Council has voted to support WP26-61 with the OSM
49 modification. Requiring this registration permit will

50

0308

1 supply very good and much needed information on moose
2 harvest in Unit 22E. Obtaining a permit will be an
3 additional burden to the users, but the Council thinks
4 that since the moose population is low requiring
5 Federal registration permit will help conserve the
6 moose population.

7

8 And that's all I have. Thank you.

9

10 CHAIRMAN CHRISTIANSON: Thank you,
11 Louis. Alaska Department of Fish and Game.

12

13 MR. MULLIGAN: Thank you, Mr. Chair.
14 For the record the Alaska Department of Fish and Game --
15 wait a minute. Yeah.....

16

17 CHAIRMAN CHRISTIANSON: That's not
18 what's up in the book. We.....

19

20 MR. MULLIGAN: Yeah, what is on that
21 screen is not correct, Mr. Chair, that's what threw me.
22 I was like I'm getting ready to say something and all
23 of a sudden I looked up and I'm like now I question
24 myself.

25

26 We oppose this proposal as a
27 misalignment of State and Federal regulations. And I
28 will make one comment that given the recommendation is
29 to give a delegation, I would encourage the member from
30 the Park Service to stress the importance of proper
31 consultation with their State brethren if and when this
32 does come to be.

33

34 Thank you.

35

36 CHAIRMAN CHRISTIANSON: Thank you, Ben.
37 InterAgency Staff Committee.

38

39 MS. LAVINE: Thank you, Mr. Chair. The
40 InterAgency Staff Committee provided the standard
41 comment.

42

43 CHAIRMAN CHRISTIANSON: Thank you.
44 Board discussion with Liaison, Council Chair, State
45 rep.

46

47 (No comments)

48

49 CHAIRMAN CHRISTIANSON: Seeing and

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0309

1 hearing none we'll open up the floor for Board action.

2

3 MR. STRIKER: Mr. Chair, the National
4 Park Service moves to adopt proposal WP26-61 with
5 modification and if I get a second I'll explain why I
6 intend to vote in support of my motion.

7

8 MR. PENDERGAST: BLM seconds.

9

10 MR. STRIKER: Thank you. And I'll
11 recognize, Mr. Mulligan, that this would come with
12 responsibilities and that you'll be tracking.

13

14 The National Park Service supports
15 WP26-61 in deference to the Seward Peninsula Regional
16 Advisory Council with modification to delegate
17 authority to the Bering Land Bridge National Preserve
18 superintendent to set harvest quotas, determine the
19 number of permits issued and the method of permit
20 allocation and to close the season. As stated by the
21 Seward Peninsula Subsistence Resource -- Regional
22 Advisory Council requiring a Federal registration
23 permit would help improve harvest reporting, allow
24 better tracking of harvest and more informed management
25 decisions which may benefit both users and the resource
26 over the longer term. As noted in the OSM analysis the
27 moose populations in Unit 22E have shown a slight, but
28 steady increase since the early 2000s while moose
29 abundance has fluctuated in Unit 22D. Moose movements
30 between these two units is currently not fully
31 understood therefore more harvest data is necessary to
32 inform management decisions.

33

34 Delegating authority to an in-season
35 manager to administer the permit provides management
36 flexibility to quickly respond to changing herd and
37 hunt conditions, optimizing both conservation and
38 subsistence opportunity. Adopting WP26-61 with this
39 modification will provide a local land manager to work
40 with rural residents who would need to acquire a
41 registration permit. The specific authority
42 delegated through this modification allows the Bering
43 Land Bridge National Preserve superintendent to decide
44 how to allocate permits and set quotas in conjunction
45 with the State if ADF&G implements a harvest quota or
46 limits the number of permits for moose in Unit 22E
47 under State regulations.

48

49 Oh, yeah, one clarification. The

50

0310

1 delegation of authority will be in a delegation of
2 authority letter from this Board not in the regulation.

3

4 Thank you, Mr. Chair.

5

6 CHAIRMAN CHRISTIANSON: Thank you for
7 that clarification for the record, Don. Any other
8 deliberation, comments.

9

10 (No comments)

11

12 CHAIRMAN CHRISTIANSON: We'll go ahead
13 and -- seeing none we'll read it into the record and
14 take a roll call, please.

15

16 MS. LEONETTI: Okay. The motion is to
17 adopt WP26-61 as modified by OSM to delegate authority
18 to the Bering Land Bridge superintendent to set harvest
19 quotas, determine the number of permits issued and the
20 method of permit allocation and close the season via a
21 delegation of authority letter only.

22

23 NPS Member Striker.

24

25 MR. STRIKER: Support with commitment
26 to consultation when appropriate.

27

28 MS. LEONETTI: Forest Service Member
29 Ingersoll.

30

31 MR. INGERSOLL: Support in deference to
32 the RAC.

33

34 MS. LEONETTI: Public Member Pitka.

35

36 MS. PITKA: I support WP26-61 in
37 deference to the Regional Advisory Council.

38

39 Thank you.

40

41 MS. LEONETTI: Fish and Wildlife
42 Service Member Boario.

43

44 MS. BOARIO: Fish and Wildlife Service
45 supports in deference to the Seward Peninsula Council.

46

47 Thank you.

48

49 MS. LEONETTI: BIA Member John.

50

0311

1 MS. JOHN: BIA votes to support WP26-61
2 with the OSM modification as recommended by the Seward
3 Peninsula RAC. We concur with the Council's
4 justification for this recommendation and appreciate
5 their efforts on this proposal.

6
7 MS. LEONETTI: Public Member Oney.

8
9 MR. ONEY: Public Member Ray Oney moves
10 to support proposal 26-61 as modified by OSM and
11 supported by Seward Peninsula RAC.

12
13 MS. LEONETTI: Public Member Woods.

14
15 MR. WOODS: Public Member Woods
16 supports proposal WP26-61 on the recommendation of the
17 RAC with modifications and OSM's conclusion and
18 deliberation at the Board.

19
20 Thank you.

21
22 MS. LEONETTI: Public Member Payenna.

23
24 MR. PAYENNA: Public Member Payenna in
25 deference to the RAC votes to support WP26-61.

26
27 Thank you.

28
29 MS. LEONETTI: BLM Member Pendergast.

30
31 MR. PENDERGAST: BLM votes to support
32 consistent with the reasoning of the Park Service and
33 the recommendation of the Seward Peninsula RAC.

34
35 Thank you.

36
37 MS. LEONETTI: Chair Christianson.

38
39 CHAIRMAN CHRISTIANSON: I support.

40
41 MS. LEONETTI: Mr. Chair, the motion
42 passes unanimously.

43
44 CHAIRMAN CHRISTIANSON: We'll move on
45 to WP26-63, muskox. Is that how you say it, I mean,
46 muskox.

47
48 (Laughter)

49
50

0312

1 MR. UBELAKER: Mr. Chair, I do believe
2 26-62B was taken off the non-consensus or taken off the
3 consensus agenda.

4
5 MR. PENDERGAST: Correct. 62 bravo.
6 It was -- this is Kevin Pendergast. That was taken off
7 the consensus agenda at the beginning of the meeting.

8
9 CHAIRMAN CHRISTIANSON: What page could
10 we find that on, Brian?

11
12 MR. UBELAKER: Mr. Chair, that can be
13 found on page 325 of the consensus agenda.

14
15 CHAIRMAN CHRISTIANSON: Thank you for
16 that. Yeah, thank you. So there you go, 325 of the
17 consensus agenda.

18
19 MR. UBELAKER: Thank you, Mr. Chair.

20
21 CHAIRMAN CHRISTIANSON: Yeah, so it's
22 in our first book, 325, page 325, 26-62B. You've got
23 the floor, Brian, go ahead and.....

24
25 MR. UBELAKER: Thank you, Mr. Chair.
26 Wildlife Proposal WP26-62B submitted by the Seward
27 Peninsula Subsistence Regional Advisory Council,
28 requests establishing a Federal muskox hunt in Unit
29 22A. The hunt would mirror the current State hunt with
30 a harvest limit of one bull by tier two drawing permit
31 and a season from August 1st to March 15th. The
32 proponent states that the Alaska Board of Game opened a
33 muskox hunt in Unit 22A because the Seward Peninsula
34 muskox herd had expanded into the area.

35
36 Aligning Federal and State regulations
37 would reduce confusion, prevent Federal rules from
38 being more restrictive than State and provide
39 additional subsistence harvest opportunity.

40
41 Through most of the history of muskox
42 hunting in Unit 22 it has been managed primarily
43 through registration permits and quota systems.
44 Federal regulations have been aligned with State
45 regulations to maintain consistency and prevent
46 overharvest. Most regulatory action included
47 establishing limited registration permits and quota
48 announcements, aligning Federal season dates with State
49 hunts for simplicity and setting the March 15th closing
50

1 date to balance hunter access with protection of muskox
2 during sensitive spring periods.

3
4 Muskox populations in Unit 22 are
5 currently stable and healthy. Survey data indicate
6 that overall numbers are meeting or exceeding
7 management objectives and the herds are showing good
8 distribution across their available range. Bull to cow
9 ratios remain strong which indicates there are mature
10 bulls available for harvest while still maintaining
11 herd productivity. On the harvest side reported take
12 has remained within established quotas. Most of this
13 harvest is being carried out by locally Federally-
14 qualified subsistence users through the registration
15 permit system and it is consistent with management
16 goals. Levels of participation remain steady and there
17 is no evidence that harvest is negatively affecting the
18 population.

19
20 Two alternatives were considered for
21 this analysis. The first was to delegate authority to
22 the BLM Anchorage Field Office manager to administer
23 the hunt. This would include setting annual harvest
24 quotas, determining the number of permits issued,
25 allocating permits between State and Federal users and
26 closing the season if necessary. Delegating this
27 authority would provide flexibility and is consistent
28 with how other muskox hunts in Unit 22 are managed.

29
30 The second alternative was to extend
31 the Unit 22A season to March 31st aligning it with a
32 proposed Federal season extension in other Unit 22 and
33 Unit 23 southwest hunts under proposal WP26-64. This
34 alternative was not pursued because Unit 22A would be a
35 new hunt.

36
37 Harvest should be closely monitored for
38 several years before considering season extensions,
39 ensuring data on effort and harvest are established
40 first.

41
42 Establishing a Federal muskox season in
43 Unit 22A provides additional opportunity for Federally-
44 qualified subsistence users who currently have no
45 Federal season and must compete for State tier two
46 permits. Conservation will be supported through
47 harvest quotas and the use of drawing permits limiting
48 harvest to the population's sustainable level. Close
49 coordination with the State will ensure effective
50

0314

1 monitoring of combined Federal and State harvests.

2

3

4 Therefore it is OSM's conclusion to
5 support proposal WP26-62B with modification to delegate
6 authority to the BLM Anchorage Field Office manager, to
7 close the season, set harvest quotas, issue permits and
8 determine permit allocation between State and Federal
9 hunts. This proposal provides additional harvest
10 opportunity while mitigating conservation concerns
11 through permit limits and quotas. It aligns Federal
12 regulations with the State hunt and ensures consistent,
13 effective management across all Unit 22 muskox hunts by
14 delegating authority to the in-season Federal manager.

14

15 And with that I'll be happy for
16 questions.

17

18 CHAIRMAN CHRISTIANSON: Thank you,
19 Brian. Any questions for Staff from the Board.

20

21 (No comments)

22

23 CHAIRMAN CHRISTIANSON: Hearing and
24 seeing none, thank you. Was there any written public
25 testimony received.

26

27 MR. UBELAKER: No, Mr. Chair, there was
28 not.

29

30 CHAIRMAN CHRISTIANSON: Thank you,
31 Brian. How about a summary of tribal government and
32 Alaska Native corporation consultation.

33

34 MR. LIND: Thank you, Mr. Chair. No
35 comments.

36

37 CHAIRMAN CHRISTIANSON: Thank you
38 there. Tribal, Alaska Native organization testimony.

39

40 (No comments)

41

42 CHAIRMAN CHRISTIANSON: Seeing and
43 hearing none, Advisory Group, Subsistence SRC, State
44 Advisory and multiagency working group.

45

46 MS. LAVINE: No comments that we're
47 aware of. Thank you.

48

49 CHAIRMAN CHRISTIANSON: Thank you for

50

0315

1 that. Public testimony either here in the building or
2 online please be recognized.

3

4

(No comments)

5

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CHAIRMAN CHRISTIANSON: Hearing and seeing no public testimony at this time we'll call on the Council recommendation.

MR. GREEN: Thank you, Mr. Chair. Seward Peninsula Regional Advisory Council voted to support WP26-62B. The Council believes that this would be -- would provide a new opportunity for Federally-qualified subsistence users of Unit 22A as the State permits are quite limited. Muskoxen population appears to have stabilized and remains in the area so there is no conservation concern. Access to muskoxen is difficult and far from town which will limit harvest, but the additional opportunity is welcome.

That's all I have. Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you. Alaska Department of Fish and Game.

MR. MULLIGAN: Thank you, Mr. Chair. For the record Alaska Department of Fish and Game supports with the OSM modification. I will make a few points though. Under the State system it is a tier two. As many of you probably know or don't know tier hunts are scored hunts which given how those work it focuses and predominantly allows for those users who have the longest amount of history eating said species, participating in that hunt, being in that area. I don't see how it provides an additional mechanism. Muskox are highly regulated or else we wouldn't have a tier hunt associated with it and the quota will be the quota. With our permit predominantly being Federally-qualified users already given it's a tier hunt, I don't know how much more it would do for having a Federal permit. You'll see more -- you'll potentially see a shift of folks who would want to hunt under Federal subsistence regulations as opposed to filling out a tier permit, but overall I do not feel like that is going to be a noticeable difference.

Thank you.

0316

1 CHAIRMAN CHRISTIANSON: Thank you for
2 that, Ben. InterAgency Staff Committee comments.

3
4 MS. LAVINE: The ISC provided the
5 standard comment.

6
7 CHAIRMAN CHRISTIANSON: Thank you,
8 Robbin. Board discussion with Liaison, Council Chair,
9 State rep.

10
11 (No comments)

12
13 CHAIRMAN CHRISTIANSON: Hearing and
14 seeing none we open up the floor for Board action.

15
16 MR. PENDERGAST: Mr. Chair.

17
18 CHAIRMAN CHRISTIANSON: Kevin.

19
20 MR. PENDERGAST: Kevin Pendergast, BLM.
21 Going to get a little fancy here with the motions, but
22 just I think there's a procedural matter to deal with
23 first. Mr. Chair, I move to modify proposal WP26-62B
24 to delegate authority by letter consistent with current
25 practice to the BLM Anchorage Field Office manager to
26 close the season, determine annual harvest quotas,
27 number of permits to be issued and the method of permit
28 allocation. If I get a second I will start the
29 discussion by explaining why I intend to support my
30 motion and then I'll move on to a subsequent motion.

31
32 MR. STRIKER: NPS seconds.

33
34 MR. PENDERGAST: Thank you. Again
35 similar to the prior proposal this is just to clarify
36 that the delegation would be via letter and we'd modify
37 the proposal accordingly and then move on to our --
38 BLM's motion on the actual substance of the matter.

39
40 CHAIRMAN CHRISTIANSON: So you're
41 voting to amend?

42
43 MR. PENDERGAST: I am moving to modify
44 the proposal to delegate authority by letter
45 specifically.

46
47 CHAIRMAN CHRISTIANSON: Okay. So he's
48 just clarifying what the language is. So we're going
49 to vote on that amendment to the original motion before
50

0317

1 we vote on it and so did we get a second to that?

2

3 MS. LEONETTI: Yes.

4

5 CHAIRMAN CHRISTIANSON: Yes, we did.
6 So for -- is anybody in opposition of that motion to
7 amend the original motion to include the delegation
8 letter with a specific -- state it on the record?

9

10 (No comments)

11

12 CHAIRMAN CHRISTIANSON: Hearing or
13 seeing none, we'll move back to the original motion for
14 discussion.

15

16 You had a question, Frank?

17

18 MR. WOODS: Are we on the original.....

19

20 CHAIRMAN CHRISTIANSON: I think it was
21 just clarifying, you know, specifics that needed to be
22 added to who was going to manage the permitting and
23 where it was going to happen and who would be that
24 authority via letter.

25

26 MR. WOODS: Yes, that just answered my
27 question.

28

29 CHAIRMAN CHRISTIANSON: Thank you.

30

31 MR. WOODS: So orig -- we're back to
32 the original motion?

33

34 CHAIRMAN CHRISTIANSON: Without
35 opposition we're back to the original motion to amend
36 it for the language Kevin just.....

37

38 MR. WOODS: Yes.

39

40 CHAIRMAN CHRISTIANSON:modified.
41 Thank you. You have the floor, Kevin.

42

43 MR. PENDERGAST: Does that mean the
44 initial motion?

45

46 CHAIRMAN CHRISTIANSON: As amended,
47 yes. So as amended by.....

48

49 MR. PENDERGAST: As amended. Okay.

50

0318

1 CHAIRMAN CHRISTIANSON: As amended. So
2 we got through that process.....

3
4 MR. PENDERGAST: Okay.

5
6 CHAIRMAN CHRISTIANSON:now we're
7 back to the original as amended.

8
9 MR. PENDERGAST: Familiar terrain here.
10 Okay. Great.

11
12 Mr. Chair, I move to adopt proposal
13 WP26-62B with modification to delegate authority by
14 letter to the BLM Anchorage Field Office manager to
15 close the season, determine annual harvest quotas, the
16 number of permits to be issued and the method of permit
17 allocation between State and Federal permit for muskox
18 in Unit 22 alpha. If I get a second I will start the
19 discussion by explaining why I intend to support my
20 motion.

21
22 MR. STRIKER: Second. NPS.

23
24 MR. PENDERGAST: Thank you. The Seward
25 Peninsula muskox population is stable and healthy and a
26 portion of this population is within Unit 22A. Since
27 the overall size of the muskox population in this unit
28 is relatively small harvest levels are carefully
29 managed through State regulation. The establishment of
30 a Federal muskox draw hunt in Unit 22A will provide a
31 limited number of Federally-qualified subsistence users
32 with the opportunity to harvest muskox for subsistence
33 uses. If adopted the BLM Anchorage Field Office will
34 work closely with the State to monitor harvest under
35 both State and Federal hunts and minimize impacts on
36 the muskox population. The modification to issue a
37 delegation of authority letter to the BLM provides the
38 in-season manager with the capacity to make adaptive
39 management decisions in response to changes in the
40 population levels and harvest rates. BLM's support of
41 this proposal is consistent with the Seward Peninsula
42 RAC's recommendation.

43
44 Thank you, Mr. Chair.

45
46 CHAIRMAN CHRISTIANSON: Thank you. Any
47 further Board discussion, deliberation.

48
49 (No comments)

50

0319

1 CHAIRMAN CHRISTIANSON: Please read the
2 motion into the record. Roll call, please.

3

4 MS. LEONETTI: Okay. The motion is to
5 adopt proposal WP26-62B as written in your Board
6 materials with modification to delegate authority to
7 the BLM Anchorage Field Office manager to close the
8 season, determine annual harvest quotas, the number of
9 permits to be issued and the method of permit
10 allocation between State and Federal permits for muskox
11 in Unit 22A via delegation of authority letter only.

12

13 BLM Member Pendergast.

14

15 MR. PENDERGAST: Aye.

16

17 MS. LEONETTI: Public Member Payenna.

18

19 MR. PAYENNA: Support.

20

21 MS. LEONETTI: Public Member Woods.

22

23 MR. WOODS: Support.

24

25 MS. LEONETTI: Public Member Oney.

26

27 MR. ONEY: Support.

28

29 MS. LEONETTI: BIA Member John.

30

31 MS. JOHN: BIA votes to support with
32 the modification and the OSM modification as
33 recommended by the Seward Peninsula.

34

35 MS. LEONETTI: Fish and Wildlife
36 Service Member Boario.

37

38 MS. BOARIO: Fish and Wildlife Service
39 votes to support as modified by OSM and the BLM and
40 with the support of the RAC.

41

42 MS. LEONETTI: Public Member Pitka.

43

44 MS. PITKA: I vote to support in
45 deference to the Regional Advisory Council.

46

47 Thank you.

48

49 MS. LEONETTI: Forest Service Member

50

0320

1 Ingersoll.

2

3 MR. INGERSOLL: Forest Service supports
4 in deference to the RAC, the BLM, Fish and Game,
5 basically every -- I think everybody.

6

7 MS. LEONETTI: Park Service Member
8 Striker.

9

10 MR. STRIKER: NPS supports agreeing
11 with the Forest Service and in deference to everyone.

12

13 MS. LEONETTI: Chair Christianson.

14

15 CHAIRMAN CHRISTIANSON: That's two
16 alignments today, I support.

17

18 MS. LEONETTI: Mr. Chair, the motion
19 passes unanimously.

20

21 CHAIRMAN CHRISTIANSON: Thank you for
22 that. We'll move right into WP26-63.

23

24 MR. UBELAKER: Thank you, Mr. Chair.
25 Brian Ubelaker for the record. The analysis for WP26-
26 63 regarding muskoxen in Unit 22 can be found on page
27 1231 of your meeting materials.

28

29 Wildlife Proposal WP26-63 submitted by
30 the Alaska Department of Fish and Game requests
31 combining two Federal muskox hunt areas in Unit 22D,
32 specifically the Unit 22D Kuzitrin and Unit 22D
33 remainder into a single hunt area. The associated
34 permits, FX2206 and FX2208 would also be consolidated
35 into one permit for the combined area. The proponent
36 notes that collared muskoxen move between these two
37 areas so there is no biological reason to maintain
38 separate hunt areas. Combining the areas would align
39 Federal and State regulation, simplify rules for
40 hunters and improve compliance. The proposal is not
41 expected to impact the muskox population as harvest is
42 already carefully managed cooperatively by State and
43 Federal managers. ADF&G also plans to propose changing
44 the State season opening date in Unit 22D Kuzitrin to
45 August 1st in 2026 creating further consistency between
46 the regulations. And since this is a muskox proposal
47 it would include the exact same information I just
48 presented to you. I will not repeat myself on the
49 regulatory history, biology and harvest and move

50

0321

1 directly to the effects unless you would all like me to
2 put you to sleep again.

3

4 Moving on. Adopting WP26-63 would
5 combine two muskox hunt areas in Unit 22D into one and
6 consolidate their permits. This would reduce
7 administrative efforts for BLM and NPS and simply
8 reporting. However the current separation exists
9 because a Section .804 restriction limits which
10 communities can hunt in each area. So in Unit 22D
11 Kuzitrin which falls under the permit FX2206, only
12 Council and Golovin residents are eligible along with
13 White Mountain, Nome, Teller and Brevig. Unit 22D
14 remainder which falls under FX2208, Elim residents are
15 eligible along with White Mountain, Nome, Teller and
16 Brevig Mission residents. So the difference between
17 Council and Golovin being eligible in one hunt area and
18 Elim being eligible in the other hunt area was created
19 by the .804 restriction. So combining the areas would
20 create logistical and law enforcement challenges as a
21 single Federal draw permit would need to account for
22 these eligibility restrictions.

23 Conservation concerns are minimal due to draw permits
24 and harvest quotas, but careful coordination with the
25 State would still be needed. Combining these areas may
26 improve alignment with State regulations in the future
27 if Unit 22D Kuzitrin season is extended to August 1st.

28

29 Therefore it is OSM conclusion to
30 oppose proposal WP26-63. The proposed permit
31 consolidation is administrative, not regulatory and
32 does not account for existing Section .804 eligibility
33 restrictions. A single draw permit while more simple
34 would create inequities, logistical challenges and
35 potential law enforcement issues making combining the
36 hunt areas inappropriate.

37

38 With that I'll try to answer any
39 questions.

40

41 CHAIRMAN CHRISTIANSON: Thank you,
42 Brian. Any questions for Brian.

43

44 (No comments)

45

46 CHAIRMAN CHRISTIANSON: Hearing and
47 seeing none, was there any written comment received,
48 Brian.

49

50

0322

1 MR. UBELAKER: No, Mr. Chair, there was
2 not.

3
4 CHAIRMAN CHRISTIANSON: Thank you.
5 We'll go ahead and move on to.....

6 MS. BOARIO: Mr. Chair.

7
8 CHAIRMAN CHRISTIANSON:summary of
9 tribal government -- somebody's.....

10
11 MS. BOARIO: And you asked about.....

12
13 CHAIRMAN CHRISTIANSON:oh, Frank.
14 Yep, go ahead.

15
16 MS. BOARIO: No, it's not Frank this
17 time.

18
19 CHAIRMAN CHRISTIANSON: Oh. Oh, Sara.
20 Oh, not Frank.

21
22 MS. BOARIO: I mean, I know it's
23 usually Frank, but.....

24
25 (Laughter)

26
27 MS. BOARIO:every once in a while
28 let's try to mix things up at this end of the table.

29
30 I was just wondering if you could speak
31 in more specifics of the implications to the .804
32 analysis of this change?

33
34 MR. UBELAKER: Did I confuse you on
35 who's eligible?

36
37 MS. BOARIO: Yes. It's -- I mean, what
38 -- what's the consequence to the -- yeah?

39
40 MR. UBELAKER: Through the Chair,
41 Member Boario. So currently in 22D Kuzitrin the --
42 let's just -- so we'll just step back, we'll take our
43 residents of White Mountain, Nome, Teller and Brevig
44 can hunt muskox in both of these areas. So only in 22D
45 Kuzitrin which is the larger section of land in 22D
46 Council and Golovin residents are also eligible with
47 the five -- the five community -- four community
48 residents that are eligible area-wide. And then in 22D
49 remainder only Elim residents are eligible. So Council
50

0323

1 and Golovin are not eligible to hunt in 22D remainder.
2 Elim is not eligible to hunt in 22D Kuzitrin. So if we
3 combine both of these hunts areas into one under one
4 permit one permit would cover all seven residential
5 areas and, but the restrictions would still be in
6 place. So an Elim resident could receive a permit to
7 hunt in this area, but he could only use it to hunt in
8 22D remainder, not in 22D Kuzitrin which right now with
9 two separate permits it's easier to enforce from a law
10 enforcement standpoint of, you know, this permit allows
11 you to hunt only in Kuzitrin, this permit allows you to
12 only hunt in remainder.

13

14 Did that help?

15

16 MS. BOARIO: So no affect on the user
17 is what you're saying, the affect would -- the
18 challenge would be for law enforcement potentially.....

19

20 MR. UBELAKER: Yes.

21

22 MS. BOARIO:is that what -- okay.
23 Just making sure I'm following.

24

25 Thank you.

26

27 MS. GREDIAGIN: Lisa Grediagin. It
28 would also make it really difficult for the hunt
29 administration. I mean, I would -- I mean, I guess
30 we're just issuing a permit -- like it would -- when
31 there's no limited number of permits, but you're trying
32 to allocate them equitably to people that don't qualify
33 for the whole area, I think if I was the in-season
34 manager it would kind of make my head explode, how to
35 like equitably distribute permits to all these people
36 that don't qualify for the entire hunt area.

37

38 CHAIRMAN CHRISTIANSON: Any other
39 questions for Staff.

40

41 (No comments)

42

43 CHAIRMAN CHRISTIANSON: Okay. We'll
44 move on to -- we were at summary of consultation, none.
45 Tribal, Alaska Native organization testimony.

46

47 MR. LIND: Thank you, Mr. Chair. There
48 were no comments.

49

50

0324

1 CHAIRMAN CHRISTIANSON: Thank you,
2 Orville. Advisory Group testimony, SRC, State
3 Advisory, multiagency group.

4
5 MS. LAVINE: Thank you, Mr. Chair.
6 There were no comments that I'm aware of.

7
8 CHAIRMAN CHRISTIANSON: Thank you. Any
9 public testimony here in the room or online.

10
11 (No comments)

12
13 CHAIRMAN CHRISTIANSON: Move on to
14 Council recommendation.

15
16 MR. GREEN: Thank you, Mr. Chair.
17 Seward Peninsula RAC Council opposes WP26-63.
18 Combining these areas would limit opportunity for
19 Federally-qualified subsistence users. There's no
20 conservation concern with how tightly managed the
21 harvest is.

22
23 That's all I have. Thank you, Mr.
24 Chair.

25
26 CHAIRMAN CHRISTIANSON: Thank you.
27 Alaska Department of Fish and Game.

28
29 MR. MULLIGAN: Thank you, Mr. Chair.
30 For the record the Alaska Department of Fish and Game
31 supports its proposal. You've heard the information,
32 we know that muskox travel through the region and
33 that's why we looked at proposing this and will be
34 looking at this at our future Board of Game
35 opportunity. Our lines are arbitrary. Animals go
36 across them as they see fit. I understand the
37 administrative headache that provides, but I know our
38 area biologist saw this information and though of this
39 proposal as a way to provide people in that area of a
40 way to harvest because sometimes those muskox may
41 travel over that line and so you'll have less in one
42 area, more in the other. By combining them those --
43 it's looked at as one permit and those numbers there,
44 it get everybody that opportunity instead of one-half
45 less, one half -- the other half more. So that was our
46 impetus for this, but like I said I understand the
47 administrative and there might be some other things
48 that we would need to do, but our -- the idea behind
49 this proposal was to give those folks overall more
50

0325

1 flexibility and hopefully more opportunity.

2

3 Thank you.

4

5 CHAIRMAN CHRISTIANSON: Thanks, Ben.
6 InterAgency Staff Committee comments.

7

8 MS. LAVINE: The ISC provided the
9 standard comment.

10

11 CHAIRMAN CHRISTIANSON: Thank you.
12 Board discussion with their Liaison, Council chair and
13 State rep. This is our opportunity to ask any
14 additional questions if you have it on your mind.

15

16 MR. INGERSOLL: Mr. Chair.

17

18 CHAIRMAN CHRISTIANSON: Yes, Jerry.

19

20 MR. INGERSOLL: For the State. You're
21 proposing to combine the unit -- the hunt in a future
22 Board of Game action?

23

24 MR. MULLIGAN: If you look at State
25 regulations right now we're separated out ourselves and
26 so we're looking at this to do in January of 2027, but
27 since the cycles were coming in, if not we'd be waiting
28 another two years potentially. And so we don't always
29 line up very well between the State and Federal systems
30 so it was close enough that our folks wanted to give it
31 a shot.

32

33 MR. INGERSOLL: Got it. Thank you.

34

35 CHAIRMAN CHRISTIANSON: Any other
36 questions from the Board, comments.

37

38 (No comments)

39

40 CHAIRMAN CHRISTIANSON: We'll open up
41 the floor for action.

42

43 MR. PENDERGAST: Mr. Chair.

44

45 CHAIRMAN CHRISTIANSON: Go ahead,
46 Kevin.

47

48 MR. PENDERGAST: Kevin Pendergast, BLM.
49 Mr. Chair, I move to defer proposal WP26-63 to combine
50

0326

1 two muskox hunt areas and associated permit
2 requirements in Unit 22D. If I get a second I will
3 open the discussion by explaining why I plan to support
4 my motion.

5

6 MS. BOARIO: Fish and Wildlife seconds.
7 Sorry, Don.

8

9 MR. PENDERGAST: Thank you. And I'll
10 just open by saying I think we started to delve into
11 some of the confusion here and imagine being like a law
12 enforcement out on the ground trying to administer this
13 and someone proving to you that they live in a certain
14 area or have customary and traditional use in a certain
15 area not in other. Fish and Game survey data does
16 suggest that muskoxen move between the two areas and
17 there is no biological reason for dividing the area
18 into two hunts. It would be easier to manage the herd
19 as a single hunt area with one single permit and
20 combining the hunt areas would provide Federally-
21 qualified subsistence users with the opportunity to
22 harvest muskox from anywhere within the area. However
23 the Board of Game has yet to meet to combine the two
24 hunt areas under State regulations. At the same time
25 combining these areas under Federal regulations would
26 present regulatory and enforcement issues as we've
27 started to consider here. Currently there are
28 different Section .804 -- ANILCA Section .804 user
29 prioritizations in each of the hunt areas. As a result
30 as we've heard a little bit about from Mr. Ubelaker
31 there are several communities that are not eligible to
32 harvest muskoxen under Federal regulations in both hunt
33 areas. Deferring the proposal until the 2028 Federal
34 subsistence wildlife regulatory cycle would provide
35 time for the Board of Game to act on a proposal to
36 unify the two hunt areas under State regulations and
37 for a proponent to submit a Federal subsistence
38 proposal to make the Section .804 user prioritizations
39 in the two hunt areas congruent under Federal regs,
40 everything lined up and at that point the Board could
41 then consider aligning the hunt areas under State and
42 Federal regulations without further complications.

43

44 Thank you, Mr. Chair.

45

46 CHAIRMAN CHRISTIANSON: Thank you,
47 Kevin. Any comments, deliberation.

48

49 Frank.

50

0327

1 MR WOODS: Member Woods, I'm reluctant
2 to defer because I think the OSM analysis and the
3 InterAgency Staff Committee comments and the Regional
4 Advisory recommendations for the Federal Board action
5 for this proposal will limit Federal subsistence use
6 and opportunity. And I'll -- maybe I'll refer to RAC
7 comments because since they opposed this proposal with
8 deferring it, get more clarification.

9
10 CHAIRMAN CHRISTIANSON: Yeah, we're
11 actually in Board deliberation at this time. So we've
12 received the information we can receive.

13
14 MR. WOODS: Oh, thank you for that.
15 I'm just walking it through my own brain on how to
16 process this. So.....

17
18 MR. PENDERGAST: Well, since we're in,
19 you know, discussion here, right.....

20
21 MR. WOODS: Yeah.

22
23 MR. PENDERGAST:I guess, you
24 know, from my perspective, Frank, it's maintaining
25 status quo, it wouldn't reduce opportunity for
26 Federally-qualified subsistence users. If we act now
27 before customary and traditional use determinations
28 have been lined up it could just create a lot of
29 confusion and administrative headache with not
30 potentially much benefit. So that's why we're
31 suggesting just to defer until the State has a chance
32 to act potentially and then we can get things lined up
33 on our end and then it would make a lot more sense from
34 BLM's perspective to act on such a proposal.

35
36 CHAIRMAN CHRISTIANSON: Any other Board
37 thoughts, comments or deliberation.

38
39 MR. WOODS: I'm sorry. That didn't
40 clarify my thought pattern on why we were walking
41 through this. So if we vote to defer it and then it
42 comes back to the table and we vote it down then we're
43 done with the issue and don't have to worry about the --
44 all the other -- because we haven't from the -- I
45 mean, we heard from the State that it's on the table,
46 it would help everybody, but then the RAC agreed not to
47 and then we -- our actions would actually limit
48 subsistence use. I know it's an administrative and
49 it's getting late in the day and I don't want to think --
50

0328

1 overthink it and walk through it too long. And thank
2 you for your wanting to help, but as a subsistence user
3 they already have the regulations in place, they're
4 already familiar with the use and if I'm one village
5 and this action item comes up two or -- or maybe next
6 year or two years from now it will restrict some of the
7 action items that need to be addressed. So I'm
8 reluctant to defer.

9

10 Thank you.

11

12 CHAIRMAN CHRISTIANSON: Any other Board
13 comment, deliberation, discussion? The action on the
14 Board is to defer with a second.

15

16 (No comments)

17

18 CHAIRMAN CHRISTIANSON: So hearing
19 none, we'll call for the motion to be read into the
20 record and we'll take a vote on.....

21

22 MR. PENDERGAST: And just a point of
23 clarification. Is it too late for that?

24

25 CHAIRMAN CHRISTIANSON: No, no. You
26 want to talk again or.....

27

28 MR. PENDERGAST: Yeah. Well, I was
29 just going to mention to folks that and I did clarify
30 this before I made my motion, you know, decision to
31 defer is not subject to RAC deference. So that is just
32 not something folks need to consider at this stage.

33

34 CHAIRMAN CHRISTIANSON: Okay. The
35 floor is now going to -- I mean, be read into the
36 record and we'll go to a roll call vote on the motion
37 to defer.

38

39 MS. LEONETTI: All right. The motion
40 is to defer WP26-63 until the 2028 wildlife regulatory
41 cycle.

42

43 BLM Member Pendergast.

44

45 MR. PENDERGAST: Support.

46

47 MS. LEONETTI: NPS Member Striker.

48

49 MR. STRIKER: Support.

50

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1 MS. LEONETTI: Forest Service Member
2 Ingersoll.

3
4 MR. INGERSOLL: Support. I think this
5 gives us a chance to get things launched so that we can
6 properly consider it.

7
8 Thank you.

9
10 MS. LEONETTI: Public Member Payenna.

11
12 MR. PAYENNA: Taking into consideration
13 BLM's comments I would support.

14
15 MS. LEONETTI: Public Member Woods.

16
17 MR. WOODS: Move to oppose.

18
19 MS. LEONETTI: Public Member Oney.

20
21 MR. ONEY: Public Member Ray Oney moves
22 to oppose.

23
24 MS. LEONETTI: BIA Member John.

25
26 MS. JOHN: BIA will vote to defer since
27 basically it'll stay the same for subsistence users.

28
29 MS. LEONETTI: Fish and Service
30 Wildlife Service Member Boario.

31
32 MS. BOARIO: Fish and Wildlife Service
33 supports.

34
35 MS. LEONETTI: Public Member Pitka.

36
37 MS. PITKA: Sorry.

38
39 (Laughter)

40
41 MS. PITKA: I support deferral. Thank
42 you.

43
44 MS. LEONETTI: Chair Christianson.

45
46 CHAIRMAN CHRISTIANSON: I also support
47 deferral based on the information provided here and
48 that causing confusion with our user group is probably
49 not the best thing. And there's an opportunity to
50

0330

1 access these currently. So I support deferral.

2

3 MS. LEONETTI: Motion to defer passes
4 eight to two.

5

6 CHAIRMAN CHRISTIANSON: My hope was to
7 get through the Seward Pen stuff today, but I think we
8 did a wonderful job. It is 6:00 o'clock, I did say
9 6:00 o'clock would be my day. I think we got to a
10 close place. I have a hundred percent faith we're
11 going to get through our agenda and so I already see
12 people packing up so I'm not even going to fight that.

13

14 (Laughter)

15

16 CHAIRMAN CHRISTIANSON: So.....

17

18 MS. LEONETTI: We're going to work
19 through lunch.

20

21 CHAIRMAN CHRISTIANSON: Potentially
22 tomorrow we'll have a shorter lunch break so pack a
23 lunch. If you don't want to stay late you got to stay
24 through. That's kind of how this works. And so we'll
25 see you guys at 9:00 a.m. in the morning.

26

27 (Off record)

28

29 (PROCEEDINGS TO BE CONTINUED)

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