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FEDERAL SUBSISTENCE BOARD
REGULATORY MEETING

VOLUME IV

EGAN CONVENTION CENTER
Anchorage, Alaska
April 24, 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 - 4/24/2026)

(On record)

CHAIRMAN CHRISTIANSON: Good morning, we're going to get started with the last day, Friday. Kudos to those who made it.

(Laughter)

CHAIRMAN CHRISTIANSON: I mean up here on the Board. All right, we're going to get started with the order of business this morning. We do have a quorum established. So first off this morning we're going to do public testimony on non-agenda items.

MS. LAVINE: Thank you, Mr. Chair. And for the members of the public, people listening online, I'm going to give a few updates and guidelines in regards to how we are going to streamline our public comment process. As you know public participation in the Federal Subsistence Management Program is what makes our program special and it is how we can track and document and rely on the knowledge and expertise of our Staff, our Chairs, our Regional Advisory Councils, and the public all across this very big state. Today, we have three different types of opportunities to provide testimony to the Board. The first is on non-agenda items, the second is going to be momentarily on the consensus agenda, if there are any items you wish to speak to on the consensus agenda and then, of course, always the opportunity to speak to regulatory action items on the non-consensus agenda as they come up on the public agenda, in their order.

We've had such a successful meeting and we have extended our days and we really want to complete this agenda and we owe it to you all to finalize Board action and decisionmaking on all of the proposals that we have before us and to do that we need to limit public comments. So today I'm going to ask you all to be mindful of your time. More than that, I'm going to ask you to limit it to five minutes. People in the room, you may see me wave or stand when we get close to it. I'm not going to come and yoink [sic] you, but I'm really going to try my very best to give an opportunity for everybody to participate and

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1 for us to get through this agenda.

2

3

4 For people online, you are able to
5 raise your hand to get in the que by pressing star,
6 five. You can do so now if you are online and you wish
7 to make comments on non-agenda items, you can press
8 star, five and, again, I'm going to limit you to about
9 five minutes. We also, so that we can get on with our
10 business, have asked that you complete your sign up for
11 testimony on non-agenda items or consensus agenda items
12 by -- well, the non-agenda items by 9:30. So people on
13 the phone, you can press star, five to get in the que.
14 People in the room you can fill out the cards.

14

15 And with that, our first person in the
16 que is Emily Edenshaw.

17

18

(Pause)

19

20 MS. LAVINE: Emily Edenshaw is not
21 available and will likely call in later, maybe.

22

23

24 The next in the que, in line, or sorry
25 in the room, is Mr. Luls from Togiak. Oh, Mr. -- oh,
26 thank you, oh, Lelani Lulrs, thank you.

26

27

28 MS. LULRS: Oh, the first to testify,
29 I'm so nervous. Wacaa' Mr. Chair, and the Board. (In
30 Native). Hello, Mr. Chair and the Board. My name is
31 Lelani Lulrs and I'm from Togiak, Alaska. My mother's
32 name is Rosa, my father's name is Steven Lulrs, my
33 grandmother's name is Fannie and my grandfather's name
34 is Henry Kohuk (ph). Quyana, for the opportunity to
35 speak today.

35

36

37 I wanted to give you a brief history of
38 my upbringing and way of life. My grandfather would
39 travel from the headwaters of the Kuskokwim River all
40 the way down to Ugashik and to the mouth of the lake,
41 and if you're familiar with the Bristol Bay region or
42 above it and beyond it, it encompasses all of Wes --
43 almost all of Western Alaska. Upon meeting his wife,
44 Fannie, and having eight children he was a leader among
45 the region bringing his children along to teach our way
46 of life. As a child, we would leave school early to
47 travel to our fish camp in (In Native), Alaska, we were
48 the last family to head to our fish camp for months at
49 a time. There at fish camp is where we would harvest
50 nearly 150 kings, the last time we stayed at fish camp

50

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1 was nearly 15 years ago where our last harvest was only
2 10 kings. At fish camp is where my sister and I caught
3 our first caribou. We packed it nearly five miles back
4 to our skiff. And I don't know if you could imagine or
5 perhaps imagine in your heads two young kids, 11 and 9
6 year old, crying across the tundra with a pack of ribs
7 on our backs yelling at our mom and dad, like why did
8 we kill a caribou so far away from our skiff but that's
9 our family, right. And as we've grown we've seen the
10 fluctuations of our relatives in our waters and our
11 lands and as our salmon stocks have been on the decline
12 we're seeing a higher resilience on our land relatives.

13

14 As subsistence users within the region
15 we are the first to notice when our relatives are in
16 trouble, or what to harvest when others are suffering.
17 We are the first to notice when stocks are in
18 abundance. Our caribou herds have grown in numbers
19 within the last few years, however, State and Federal
20 recommendations have not considered that our need to
21 feed our families has grown due to the decrease in king
22 salmon. The past fall we spent nearly three grand to
23 harvest one single moose. With the increase in fuel
24 prices, the cost to feed our families has increased.
25 I'm watching families unable to feed their families
26 their traditional foods due to the increase in cost.

27

28 I also wanted to speak on the
29 importance of herring and herring roe on kelp within
30 our region.

31

32 Currently, the State has increased
33 allocation in the Dutch Harbor food and bait industry
34 and the fleet of trawlers in the Federal waters are
35 asking for more allocation of herring. I do realize
36 that this is not the fish, but I wanted to make the
37 Board aware of what's happening within our Federal and
38 State waters. Herring is a key pelagic fish that feeds
39 our salmon and are the first foods in the spring for
40 our people within our region and across the west coast.
41 They did not take into consideration that families
42 along the western coast that rely on herring in the
43 spring. Just because we're not harvesting herring
44 commercially does not mean that we are not harvesting
45 herring for subsistence. I really do appreciate the
46 Board Chair and your comments on protecting the herring
47 in the Southeast and would love to move forward on how
48 we can protect our herring along the west coast.

49

50

1 One recommendation that I had as a
2 subsistence users in the region is to have regional
3 leaders travel along Federal and State surveys of our
4 animals so that we have an equal determination of our
5 animals and I would also invite those that would like
6 to participate in our hunts to observe how we harvest
7 in our area. And as a hunter and gatherer and a
8 subsistence users within my region I would invite any
9 of you that would want to come along to come along.

10

11 Quyana for listening.

12

13 CHAIRMAN CHRISTIANSON: Thank you.
14 Appreciate your testimony this morning. Any comments.

15

16 Frank.

17

18 MR. WOODS: Well, Lelani, I'm glad I'm
19 not the only one that had a struggle with pronouncing
20 your name. I appreciate your testimony and input. Not
21 only that your knowledge of the area, real honorable to
22 sit here and listen to your -- and the group that you
23 came with, BBNA, and Togiak, you come from a village
24 that set precedence, the State of Alaska and the
25 Federal government, that sat down and said let's work
26 this out with the Walrus Commission. They have their
27 own traditional council that has wildlife citations and
28 proposals before them. They also take control of the
29 village to the point where we model at. It's a
30 cooperative management. I see you in many meetings and
31 I appreciate that knowledge just as a community member
32 and a subsistence users of the resource, but an
33 Alaskan, because what you're talking about is we're all
34 affected by all these things. And as a traditional
35 indigenous Native Alaskan, I think we have a different
36 perspective. We have a holistic approach. We look at
37 things coordinated and are connected and that means a
38 lot in our area. Because No. 1, we help try to come to
39 -- when you speak you help come try to solve the
40 problem, whether it's good or bad and we're on
41 different pages, coming to the table with solutions is
42 what I hear you talk about.

43

44 So, thank you.

45

46 MS. LULRS: Quyana for your comments,
47 Woodsy -- or Frank. Growing up -- because I have a (In
48 Native) dad, he's a White man, he always instilled,
49 like he adopted our Yup'ik values as his own and when I
50

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1 see that we can come together whether we're from
2 outside Alaska that moved in here to be a subsistence
3 users or as an Alaska Native that lives off the land,
4 that we've lived on for the last 10,000 years, I think,
5 we could come to an agreement for the betterment of our
6 lands and waters and air, so it's not always a fight.
7 And that's what I look to do, I just like to be in the
8 middle and mediate things.

9

10 MR. WOODS: Thank you.

11

12 CHAIRMAN CHRISTIANSON: Thank you,
13 appreciate that. Thank you.

14

15 MS. LAVINE: Next in the room is Gloria
16 Burns.

17

18 MS. BURNS: (In Native) Good morning,
19 thank you, Chairman Christianson and Board. I
20 appreciate the opportunity to share some observations
21 and to be present with all of you. I feel like I've
22 seen you all so much you're getting to be very familiar
23 faces.

24

25 I'm the president of Ketchikan Indian
26 Community. The first thing that I wanted to really
27 talk about is the disjointed way in which the Federal
28 agencies are approaching consultation with tribes and
29 how it affects the trust and treaty responsibility and
30 then, in turn, affects your ability to listen and to
31 effectively manage this effort to move the Forest
32 Service out of Alaska while we're doing a TLMP land
33 management plan in Southeast, while we're increasing
34 outsourcing and essentially, you know, pillaging of my
35 non-human relatives, at the same time we're going
36 through these processes of regulatory and it feels like
37 every system is being broken. And when you look at
38 some of the rules around consultation and the ways in
39 which the Federal government is supposed to honor the
40 trust and treaty responsibility to tribes, it's not
41 supposed to be in a vacuum, separate of each other. I
42 would say that these management practices regarding
43 Federally-qualified users on the Tongass cannot be
44 looked as separate from the Roadless Rule, cannot be
45 looked separate from the intention to dismantle the
46 Federal Subsistence Board, cannot be looked at separate
47 from the moving of the Forest Service management out of
48 Alaska, from the consolidation of the Bureau of Indian
49 Affairs out of Alaska. Literally every single system
50

1 that supports the rural subsistence users who are
2 indigenous are being destroyed and I would say that
3 it's destroying the quality of life for every rural
4 subsistence user, indigenous or not. And I want to say
5 that it really is frustrating to watch Federal
6 agencies, as the State who has been, in my opinion, and
7 the opinion of the Ketchikan Indian Community, a poor
8 management of some of the resources we find to be
9 extremely important, as this happens and then we're
10 moving on to, you know, a conversation we're not even
11 having is, like the Governor's -- the Governor's idea
12 of changing the Constitution for a unified system while
13 we're sitting here. So it's very hard to pour energy
14 and love into a system that I know needs to stand up
15 because it's so important to all of us, while I know
16 that every single system that should be supporting and
17 protecting my people is currently in a system of a
18 disarray or pulled down. And I just had to say that
19 because so much of the time and energy is going into
20 that.

21
22 I want to say that the Federal
23 Subsistence Board and its make up and it's make up of
24 the RACs is extremely important and Ketchikan Indian
25 Community will continue to support that because it is
26 what is good for the Federally-qualified user and I
27 think what's good for the Federally-qualified user is
28 good for all of Alaska and that I would love to come to
29 a meeting some day in which the State is looking to
30 align their regulations with the traditional and
31 ecological knowledge that is being presented through a
32 very thought out process that is not a popularity
33 contest as is the ACs. You know so I want to say that.

34
35 I want to say that as we move through
36 what is becoming a very divisive time in my region, I
37 want to say that Ketchikan showed up, we knew all the
38 rules, we indicated the importance of our life. And I
39 just want to say, because I think I want to explain
40 what rural is to me, how I grew up.

41
42 I grew up five miles out of Ketchikan
43 when I wasn't living with my Noni, you know, right
44 outside, you know, essentially in Ketchikan with no
45 running water half the year. The running water that we
46 did have was from a muskeg dam where we cut all of our
47 wood, where we chopped all of our wood, where when we
48 didn't have food we didn't have money for a bullet to
49 go get a deer, we went ahead and we went in a giant
50

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1 clam pit and we didn't have gas for a car so you walked
2 in to town and then you went ahead, if you didn't have
3 a relative who was from out of town who might give you
4 a ride, you went ahead and you called a cab, we called
5 Mr. Tatsu because he drove cab and, Neil, and we'd say
6 drop me off out at the Saxman Beach where the cockles
7 were big and we would get dropped off and you'd work
8 the tide in and out and then you'd go home and you'd
9 eat your seamers, your half clams, you know, shells,
10 your clam chowder, smoke your cockles, you know, that.
11 And because of where we lived, our catch was often my
12 uncle Robert Omquest, it was from his boat, he'd fish
13 then he'd bring his home catch and we'd take care of it
14 or you were, you know, doing things that I guess
15 everybody in this room wouldn't actually consider legal
16 to put a fish on your table. And so that was that
17 experience.

18

19 And so I just want to say I know that
20 you're in a difficult situation right now and say, we
21 fought this fought since we were left out by 153 votes
22 from being Federally-qualified, we've done this vote
23 three times, Ketchikan just shut two schools down,
24 Ketchikan had a landslide that separated everybody from
25 everywhere else and when we go -- if we go through this
26 process again we'll only look more rural in two years
27 -- in one year, we're going to look much more rural.
28 So I'm thankful you have a very limited scope in which
29 to judge whether or not to address this threshold
30 analysis.

31

32 CHAIRMAN CHRISTIANSON: Thank you,
33 Gloria.

34

35 MS. LAVINE: Once, again, I will ask
36 everyone to please work to limit their comments to five
37 minutes. I will stand to help keep track when you are
38 approaching your limit. For people online and people
39 in the room, we will take comments or raised hands to
40 provide comments on non-agenda items until 9:30. That
41 means you need to sign up by 9:30.

42

43 Next in the room is Leslie Isaacs.

44

45 MR. ISAACS: You got to hit the button,
46 technology challenged this morning, sorry about that.
47 My coffee cup, for the record, is only this full, that
48 means I only had half a cup so far.

49

50

1 So good morning. My name is (In
2 Native) I am Haida Eagle Frog from the (In Native) Clan
3 and this morning I'm speaking to you on behalf of the
4 Hydaburg Cooperative Association, a Federally-
5 recognized tribe located in Hydaburg, Alaska on Prince
6 of Wales Island. The agenda item that I wanted to
7 speak to is the reduction and the change of the make up
8 of the Board that is here this morning. And what I
9 want to share is how important subsistence or what
10 would technically be called subsistence, but what is
11 our way of life in the village, how important that is
12 to us. In Hydaburg, we have, depending on whose
13 statistics you look at we have about a 28 percent
14 unemployment rate, so if you go one, two, three you're
15 unemployed; one, two, three, you're unemployed; one,
16 two, three you're unemployed, which means you don't
17 have an income to drive 45 minutes to an hour to the
18 nearest grocery store to buy a piece of meat that cost
19 120 or 130 bucks that here at Costco you'd be able to
20 buy for \$25. So your resources are already strained
21 and limited. And then what I know, because I used to
22 work for the state of Alaska, Department of
23 Administration, I'm chairman of a few -- or one board
24 and on several boards, that are looking at economic
25 development issues. I worked for the city of Klawock
26 as a city administrator for a dozen years. And what I
27 know is meetings like this take place and if you're not
28 represented at the table your voice is never heard.
29 And that lack of representation exists all throughout
30 our villages. There's decisions that are being made
31 that are going to impact my tribal citizens at Hydaburg
32 Cooperative Association in very detrimental ways that
33 they don't even know are being made.

34
35 Now, I recognize our Board Chair is
36 from Hydaburg and I thank you for that. However, if
37 you take away the representation of our people in our
38 villages it has a very harmful effect because our voice
39 isn't even heard. Our opinions are kept to ourself.
40 We're going to go do what we need to do to put food on
41 the table to take care of our families but it's very
42 important that we work with the systems that are in
43 play and that we're part of that system.

44
45 I want to share with you a really quick
46 story about fishing and I know it's not relevant to the
47 deer stories but one summer we're out sockeye fishing,
48 beach seining, putting up fish for the winter and my
49 son, he was about 12 or 13 years old, and my father who
50

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1 now can no longer fish with us because he's 87, but at
2 the time he was about my age, which I thought was old
3 then and now I think is kind of pretty young but my dad
4 turned to me and -- because my son was in the skiff, my
5 dad turned to me and said, he's really getting this
6 figured out, he's going to be a good skiff man. And
7 the importance of that to me is that I remember when I
8 was my father's skiff man and now my son is practicing
9 our way of life, helping put up fish but there's my
10 father, who very proudly is telling me how good my son
11 is doing. And if you can't tell I have tears in my
12 eyes because of the emotional connection we have with
13 our way of life. This isn't just putting food on the
14 table, this is generation to generation to generation,
15 teaching our young ones who we are.

16

17 I sat in front of a U.S. Forest Service
18 presentation down on Prince of Wales Island, they were
19 talking about the LWDs and some of us know what the
20 large woody debris is, but at the time I had no clue
21 and the scientists in the room, the Forest
22 practitioners, the stream management people, they were
23 all getting up giving a very technical presentation and
24 in my -- I got 10 seconds left.

25

26 (Laughter)

27

28 MR. ISAACS: And in my response to them
29 I said, this, I don't care what you call it, I don't
30 care how you do it, you just make sure that there's
31 fish there so that I could teach my grandson our way of
32 life.

33

34 And with that I'll close.

35

36 Haw'aa.

37

38 CHAIRMAN CHRISTIANSON: Thank you,
39 Scooter, appreciate you representing Hydaburg today
40 too. Thank you.

41

42 MS. LAVINE: Next in the que is Shania
43 Murphy who is going to speak for Emily Edenshaw. Thank
44 you.

45

46 MS. MURPHY: Ms. Emily Edenshaw had to
47 fly out for a family medical and as we all know, family
48 comes first and she's asked me to say this for her.

49

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1 Good morning, Chair and members of the
2 Federal Subsistence Board, My name is Emily Edenshaw.
3 I serve as the Tribal Administrator and CEO for the
4 Ketchikan Indian Community. Before stepping into this
5 role, I had the honor of serving as President and CEO
6 of the Alaska Native Heritage Center. I also served on
7 the State of Alaska's tourism board, and I co-authored
8 an academic paper examining the origins of tourism in
9 Alaska tracing how the industry, in part, grew out of
10 the boarding school era and the commodification of
11 Alaska Native cultures. I share that not just as
12 background but to underscore that I come to this
13 conversation with both professional and academic
14 experience in tourism, in addition to my role as a
15 Tribal administrator. But above all else, I come
16 before you as a mother and an auntie to many young
17 people across Southeast Alaska, including Ketchikan,
18 Craig, Hydaburg, Anchorage, and Fairbanks. I'm also a
19 homeowner in Ketchikan, and my family has deep roots
20 across this region. I'm speaking from both professional
21 responsibility and lived experience.

22
23 Today, I want to talk about something
24 that is often treated separately but in reality, it is
25 deeply interconnected: tourism, sport fishing and
26 hunting, along with the health of our waters. And why
27 that matters directly to your role as the Federal
28 Subsistence Board.

29
30 Southeast Alaska is experiencing
31 unprecedented levels of tourism in communities like
32 Ketchikan, Juneau, Craig, and more, we are seeing more
33 visitors than ever before. Tourism is Alaska's third-
34 largest industry and with that scale comes real impact.
35 Strain on infrastructure. Strain on housing. Strain
36 on public safety. And most importantly, strain on the
37 natural resources that subsistence users depend on. At
38 the same time, we are seeing increasing pressure from
39 sportfishing and hunting industries. Lodges are
40 expanding. Guided operations are growing. And the
41 cumulative harvest and use of fish and wildlife is
42 intensifying. Let me be clear, this is not about being
43 against tourism or sportfishing, this is about balance,
44 this is about sustainability and this is about ensuring
45 that subsistence is not pushed to the margins because
46 right now, what we are seeing is an imbalance. We have
47 large-scale, profit-driven activities operating in the
48 same ecosystems that our people rely on for subsistence
49 yet the cumulative impacts of those activities are not
50

1 always fully accounted for in management decisions and
2 when you add pollution into that equation, when you
3 consider what is being discharged or dumped into our
4 waters, the concern becomes even more urgent. Our
5 waters are not just resources, they are our food
6 systems, they are our culture, they are where knowledge
7 is passed down from one generation to the next. Last
8 summer, I processed my first batch of fish with my
9 mother-in-law. I remember complaining about my back
10 hurting, and she said, you're only working on three
11 fish.

12

13 (Laughter)

14

15 MS. MURPHY: She taught me how to filet
16 a fish, how to follow the spine with the knife and to
17 this day, I love the sound of cutting fish. That is
18 not just a memory, that is culture, that is identity.
19 And the question before us is this: what happens if
20 access to those experiences is diminished? What happens
21 if the resources themselves are no longer there in the
22 same way? That is where your role becomes critical.
23 Under federal law, this Board has a clear mandate: to
24 provide a priority for subsistence uses on Federal
25 public lands and waters. That responsibility is not
26 passive, it requires active, forward-looking
27 management. It requires you to consider not just
28 individual regulations but cumulative impacts. It
29 requires you to recognize when increasing commercial
30 activity, including guided sport use and tourism-
31 related pressures begin to encroach on subsistence
32 opportunity and it requires you to act before those
33 impacts become irreversible.

34

35 When I spoke in support of HB 366, my
36 message was grounded in a simple principle: the people
37 closest to the impact must have a meaningful role in
38 decision-making. The same principle applies here.
39 Rural and tribal communities are not just stakeholders,
40 we are rights holders, we are knowledge holders and we
41 are the ones living with the outcomes of these
42 decisions every day. So I ask this Board to fully
43 utilize its authority to strengthen oversight where
44 pressure is increasing, to account for cumulative
45 impacts across tourism, sport harvest, and
46 environmental stressors to ensure that subsistence
47 priority is not just protected in theory but upheld in
48 practice because these issues are not separate they are
49 connected and so is your responsibility to address
50

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1 them. If we are serious about protecting subsistence,
2 about honoring rural priority, and about ensuring that
3 future generations can live, harvest, and thrive in
4 Southeast Alaska then we must act with intention now.

5

6 Gunalch esh. Haw'aa. Thank you.

7

8 CHAIRMAN CHRISTIANSON: Thank you,
9 Shania, appreciate the testimony.

10

11 MS. LAVINE: Thank you, Mr. Chair.
12 Next in the que is Mr. Joe Williams.

13

14 MR. WILLIAMS: Good morning. My name
15 is Joe Williams. I'm tribal President for the
16 Organized Village of Saxman. I choose to stand this
17 morning primarily because I'm old school. I grew up in
18 the Alaska Native Brotherhood and Alaska Native
19 Sisterhood and we were taught then when you're speaking
20 you must stand so that people will see who is speaking.

21

22 I'm here today to share a couple of
23 stories with you and this should tell you that I'm
24 already very old, if you hadn't already figured it out.

25

26 When I was growing up we had a young
27 man in our village and since he's passed it's okay to
28 use his name, his name was Henry Jackson. Henry
29 Jackson stood 5.3" He was our hunter in our community.
30 When hunting season came it was when he decided it was
31 hunting season. This will tell you this was during
32 Territorial days. And when he hunted he would come
33 home with two or three deer, fed the community of
34 Saxman. Today we have right at about 440 in population
35 in our small community of Saxman. Traditionally, early
36 on it was right at about 120 to 130 if you counted all
37 the dogs and cats in the community of Saxman, but we
38 fed -- he fed us during those winter months. Then we
39 became a state. And often times we -- please know, I
40 give tours for a living during the summer months and
41 I'm always asked, has becoming a state been good for
42 you? Initially I would say yes. But I remember when
43 my dad was asked to pay 25 cents for a fishing license,
44 a commercial fishing license and he said, what for, so
45 we can find out how many commercial fishermen are in
46 Southeast Alaska. So I'm not sure how many folks can
47 afford that 25 cent fishing license today because it's
48 no longer 25 cents.

49

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1 I want you to think in terms of this.
2 Here we are sitting in a committee event, the way I
3 view this. I'm a president of a Federally-recognized
4 tribe, the 574 Federally-recognized tribes in the
5 United States, of that 229 of them are right here in
6 Alaska. Federally-recognized tribes bring more Federal
7 dollars to the community of Alaska than -- if Alaska
8 had to service us, they would be truly in a serious
9 financial challenge. Federally-recognized tribe. We
10 have a direct relationship with the United States
11 government. And when we're talking about fishing we
12 are set in a committee with no authority other than
13 those that are representing us. That, I struggle with.
14 A Federally-recognized tribe and the committee picks
15 presidents over our authority. This may not be the
16 venue to say that but I need to start someplace and
17 this is where I happen to start this morning.

18
19 Often times when Alaska Native
20 Brotherhood, we judge our speaker by the color of his
21 hair, if it was grey like mine is, we were going to be
22 here for a long time. I was told I had five minutes
23 and I just took 30 seconds of that 4 to 5 minute time
24 period this morning.

25
26 I appreciate the opportunity to come
27 and address you this morning, please know that. But I
28 would like to leave you with this thought, Federally-
29 recognized tribe has the authority of the United States
30 government and, yet, we sit on a committee and our
31 voice is not heard if we should not have a
32 representative on this Board. So when you hear someone
33 saying that they are representing a Federally-
34 recognized tribe, they are representing a government.
35 It was given by the United States government to that
36 Federally-recognized tribe.

37
38 Mr. Chairman, thank you very much for
39 your time. Members here today on the Board, appreciate
40 your time, and those of you who are here today to say
41 what you have to say, please say do so as was stated
42 earlier, if you don't speak who's going to speak for
43 your community.

44
45 Gunalcheesh. Gunalcheesh.

46
47 (Applause)

48
49 CHAIRMAN CHRISTIANSON: Thank you, Mr.
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1 Williams.

2

3

MS. LAVINE: Mr. Chair, we have a few
4 more people in the room, we have one person online, we
5 will be taking no more requests for non-agenda items at
6 this time. I just wanted to let the person online know
7 that we'll get to him at the end of the in-room folks.
8 Next in the que is Clinton Cook.

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MR. COOK: Good morning. My name is
Clinton Cook. I am also a tribal President of a
Federally-recognized tribe in Craig, Alaska. I've been
sitting over here for five days calm as a cucumber
listening to my right as a tribal President to stick up
for my resource that is being attacked.

A few years ago this body, of the
Federal Subsistence Board, recognized our subsistence
rights were harmed by the reduction of deer, our only
game we can harvest, was in decline, and we changed
your position so we had access to that animal by a
rural priority. That was in place until rural priority
of Unit 1 got switched so where did our pre-rural
status of Unit 1 go? Did you just wad up that piece of
paper and throw it out like we didn't matter? I
believe the process was flawed one year ago when we
were told we did not come testify and Unit 1 flooded
the room, I have no idea what room it was in. There's
been lots of talk up here about fishing, that priority
has nothing to do with fishing. I can get a Federal
subsistence permit to spear salmon in the river but all
of our permits for fish come from the State. Let's
make that clear, there's no rural priority for salmon
in our area, I still have to go to the State and ask
for a permit in once was the day was traditionally
ours. I respect our salmon. If you don't realize
where I live in Craig, Alaska, just Google it and then
Google Hunters Bay, Alaska, we're four miles from the
border of Canada to go get sockeyes because we don't
want to put more pressure on our streams that are close
to home.

I've been sitting there listening,
wondering why people can talk about non-agenda items.
I've respected that until now. When every day public
testimony talks about agenda items. I'll be clear of
that. The comments about fishing isn't about a rural
priority, fishing is a State fishery where we have to
buy a license or get a permit to harvest sockeyes, the

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1 same with deer, we have to buy a permit, they give us
2 tags, we harvest -- try to harvest our animals. Look
3 at the data. Over five days for one Federally-
4 qualified user to harvest one deer. Gas, we're fairly
5 lucky, we haven't hit the \$6 plateau yet for a gallon
6 of gas but we still pay \$10 for a loaf of bread. We
7 still pay \$9.50 for a gallon of milk. We're forced to
8 start eating food that we don't like to eat because our
9 rural priority hasn't been met, our subsistence needs
10 are not being met. I don't like eating pork chops or
11 hamburger. But when my rural priority and subsistence
12 is not being met we have no choice.

13

14 I'm passionate about my region and I
15 will defend it to the end if needed. You guys have a
16 daunting task in front of you but I felt -- I followed
17 the law just like everybody else did, I had the right
18 to challenge the request for reconsideration because I
19 felt we weren't allowed in the process. All week, all
20 week I've heard everybody say, with the mic in their
21 hand, I give deference to the RAC. Then I heard, oh,
22 we can't give deference to the RAC on a rural priority
23 because it doesn't affect harvest. It affects harvest.

24

25 But I don't want to take too much of
26 your time. I'm a tribal leader. I feel giving me five
27 minutes in front of this body once a year is once,
28 again, not okay.

29

30 The last thing I'd like to speak on is
31 the challenge that came to Interior from the Safari
32 Club. We sit as an alliance of Southeast tribes in
33 Alaska, we formed a body of an alliance of Southeast
34 tribes in Southeast Alaska. The priority was to
35 defence everybody in this semi-circle. Everybody in
36 this room we defended adamantly. My tribe has trust
37 land. On that trust land we have a gift shop and duty
38 free tobacco, a very popular place on our island. It
39 felt so important to me to protect the Office of
40 Subsistence Management, the RAC Councils and the
41 Federal Subsistence Board, we had Staff sitting in our
42 businesses day after day taking their name, their
43 address, and we forwarded that document to the
44 Department of Interior protecting this right we have
45 for a rural priority in Alaska. This is our only
46 voice. We took it serious. We had other businesses we
47 posted up in to protect you guys as a body. We have a
48 cannabis store, the first tribe in Alaska to have a
49 dispensary, we posted people up in there to make sure
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1 our voices were heard. I put those same documents on
2 the Inter Island Ferry Authority, a ferry that runs
3 from Ketchikan to Hollis every day, just like a cruise
4 ship docking up on our island. We got comments off of
5 that ferry boat to protect our way of life. I took it
6 as a serious harm to the rural people of Alaska to not
7 have a voice in subsistence. I believe in the end we
8 submitted well over 250 documents to Interior out of my
9 village because I felt the passion to protect my voice
10 as a rural user and to protect you, who listen to me as
11 a rural user. I wanted to make sure that you guys know
12 we took it serious to protect the process we are given
13 and one percent of the fish and game that subsistence
14 users use every year in Alaska.

15

16 Thank you for your time. Thanks for
17 the five minutes. And I look forward to the proposals
18 coming that affect my area.

19

20 Thank you.

21

22 CHAIRMAN CHRISTIANSON: Thank you,
23 President Cook, appreciate your testimony this morning.

24

25 MS. LAVINE: Thank you, President Cook.
26 Mr. Aaron Beam conceded some of his time to you but
27 there is some time left, Mr. Beam.

28

29 MR. BEAN: Good morning. Aaron Bean of
30 the Craig Tribe. I'm not going to repeat a lot of what
31 President Cook said but I would like to just, you know,
32 incorporate all that testimony by reference, apply it
33 to mine.

34

35 And mainly I wanted to ensure that, in
36 fact, the people making the decisions here today,
37 received our request for consideration that was
38 submitted on July 21st, 2025. I went through some of
39 these things in the almanacs that are provided by
40 volume for these meetings, which is impressive, if you
41 people can get through that, but I wanted to make sure
42 that you read that and that you read it word for word,
43 and that you took it the same way you would if there
44 were an analysis given by any other governmental
45 official sitting before you, with the same weight.

46

47 And to speak briefly to what President
48 Cook had mentioned, I understand that you guys can't
49 manage wolves and bears and predators, we get it. The

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1 deer population on Prince of Wales Island is plummeting
2 at alarming rates prior to Ketchikan getting its rural
3 status. So I just want to make that really clear.
4 This is not conjecture, this is not speculation, this
5 isn't something that people feel is happening, the data
6 is there if you read it. You know the bear population
7 is growing because you have to have a guided hunt in
8 order to take it, which means people are not paying
9 that much money to go kill a bear on Prince of Wales
10 when they can the next island up, just plain and
11 simple. The wolves, we believe, and we've made it
12 really clear through the RAC process, again, supported
13 with the data, traditional ecological knowledge, that
14 it's not being managed the way that we think it is, we
15 think that there's more wolves. And speaking briefly
16 to the study that's cited with radio collars, that's
17 over 20 years old, talking that there's unreported
18 poaching and like it's absurd. The data set should not
19 be considered.

20

21 Anyway, I'm going to wrap it up here.

22

23 All we're asking is that you take this
24 into consideration the same way you would with any
25 other government. I've spent a lot of time, our tribe,
26 our Council, our elders, we've spent a lot of time
27 trying to articulate our position and we're just asking
28 that you consider that. And I appreciate your time, I
29 look forward to the discussion and you guys taking up
30 the request for reconsideration because we believe
31 firmly that it meets all the criteria needed.

32

33 Thank you.

34

35 CHAIRMAN CHRISTIANSON: Thank you,
36 Aaron, appreciate your testimony this morning.

37

38 MS. LAVINE: We have one more person in
39 the room and at his request we will -- I will let the
40 person online go first. We have one person online and
41 that is Eric Benedict. Eric, you may address the
42 Board.

43

44 MR. BENEDICT: Hello, thank you. Can
45 you all hear me?

46

47 REPORTER: Yes.

48

49 MR. BENEDICT: Hello, can you hear me?

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1 CHAIRMAN CHRISTIANSON: Oh, yes, I can
2 hear you, sorry.

3
4 MR. BENEDICT: Oh, perfect, thank you
5 so much. Hello. Members of the Board. Thank you for
6 hearing my testimony. My name is Aaron Benedict. I
7 live in Juneau and spend my summers working with youth
8 in Angoon but I grew up in the wilderness of New York
9 City. I represent myself as a non-rural subsistence
10 users who regularly interacts with rural subsistence
11 users.

12
13 My biggest concern is that the people
14 who rely on these resources are not adequately
15 compensated by visitors and outfitters who directly
16 profit off the extraction of resources. I am grateful
17 for the generosity of the subsistence users who have
18 taught me and shared with me both resources and method.
19 I think we should look at creative ways to have non-
20 subsistence users compensate, subsistence communities
21 appropriately for extracted resources in places where
22 fish and wildlife numbers are decreasing. I think it
23 is important that fees for commercial and personal use
24 permits somehow find their way to the communities that
25 they may be in competition with.

26
27 I am grateful to have been invited to
28 partake in subsistence and in the traditional lands and
29 waters of the clans and people of Kootznoowoo. I have
30 been lucky to take part in beach seining, berrypicking,
31 crabbing, collecting gumboots and cockles, black
32 seaweed and enjoy these resources as a guest in these
33 lands.

34
35 That is my short statement.

36
37 Gunalcheesh and thank you all for
38 listening.

39
40 CHAIRMAN CHRISTIANSON: Thank you for
41 your testimony this morning, appreciate it.

42
43 MS. LAVINE: Mr. Chair. We had one
44 misfiled comment. Oh, actually, please go ahead
45 Lawrence Amore [sic].

46
47 MR. ARMOR: Good morning. My name is
48 Lawrence Armor. I am speaking on behalf of the Klawock
49 Cooperative Association and my role as Community
50

1 Catalyst charged with protecting and sustaining our
2 customary and traditional uses and practices.

3

4

5 I want to address recent petitions from
6 the Safari Club International directed at the Federal
7 Subsistence Board. These proposals to remove public
8 seats, require deference to the Alaska Department of
9 Fish and Game and limit special actions are not
10 neutral. They represent a fundamental shift in who
11 holds authority and whose voices matter.

11

12

13 For our community, customary and
14 traditional use is not theoretical, it is how we feed
15 our families, how we teach our children, and how we
16 maintain our cultural identity. Federal protections
17 under the Alaska National Interests Lands Conservation
18 Act exist because Congress recognized that rural and
19 Alaska Native communities require a priority, not just
20 equal footing, to continue this way of life. For
21 Alaska Native people customary and traditional use is
22 not simply access to resources, it is the exercise of
23 inherent rights and responsibility to pass knowledge,
24 stewardship and food security from one generation to
25 the next.

25

26

27 The current proposals would require
28 deference to the State of Alaska on conservation
29 matters, curtail the Board's temporary special action
30 authority and fundamentally undermine the rural
31 priority established under ANILCA. We view these
32 proposals as a direct attack on subsistence rights of
33 Alaska Native people and rural Alaskans. Congress
34 created the Federal Subsistence Program because the
35 State of Alaska cannot constitutionally implement
36 ANILCA's rural priority as affirmed in McDowell v.
37 State, the Katie John cases, and most recently, the
38 United States v. Alaska. The State has had more than
39 three decades to amend its Constitution and has chosen
40 not to. Any management authority back to the State or
41 weakening the Board and the Office of Subsistence
42 Management would betray the original intent and the
43 Federal trust responsibility. Removing public seats
44 removes a lived experience of people on the land from
45 the decisionmaking process. Limiting special actions
46 restricts the Board's ability to respond to realtime
47 conditions that directly affect our access, our safety,
48 and our food security. Taken together, these changes
49 move decisionmaking further away from communities most
50 impacted and toward outside interests that do not rely

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1 on these resources to survive.

2

3

I'm here to be clear protecting customary and traditional use is not just about access, it's about upholding a legal obligation and honoring a way of life that has existed long before these systems were put in place.

8

9

10 On behalf of the Klawock Cooperative Association, I urge the Board to maintain public representation, uphold independent Federal authority under ANILCA, preserve the full use of special actions to protect customary and traditional uses and practices. Because if these protections are weakened, the consequences will not be abstract, they'll be felt in our homes, our freezers and our future generations.

17

18

Thank you.

19

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CHAIRMAN CHRISTIANSON: Thank you, Lawrence, for your testimony this morning.

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MS. LAVINE: Mr. Chair, the last on the non-agenda item testimony is Karen Linnell.

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MS. LINNELL: Thank you, Mr. Chair. For the record my name is Karen Linnell. I am the Executive Director of Ahtna InterTribal Resource Commission, which is comprised of eight Federally- -- and State recognized tribes and two ANCSA Corporations, who are the land owners and that participate in our Board and the work that we do.

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This week has been a rough week. I'm sorry I missed yesterday, apparently there was some conversation that happened, and the day before, but we had to put an elder away. He took his last journey home. Just a few weeks ago I saw him in Glennallen, and he rarely leaves Chistochina, which is my village, where I grew up, because he's caring for his autistic grandson. And so I called him and I said, is that you that I saw in Glennallen, he started laughing and he said, yeah, I had to run to Glennallen while I can because my boy's -- while my boy's in school. And I told him to swing by the house, I got some moose meat for you. He came by, I sent him home with some moose burger and moose meat. And we talked just for a minute, he said I got to get home before he gets off the bus and he took off and left. He called me a

1 couple days later and he said, gee, I made some
2 spaghetti for that boy with that moose burger and he
3 just ate it up, he said, he almost ate the whole thing.
4 And 16 years he's been taking care of that boy. As
5 soon as he retired, he -- first thing he ended up doing
6 was caring for his grandson. This last couple days, I
7 got home at 2:00 o'clock in the morning yesterday from
8 Mentasta for the potlatch, and I watched the young
9 people there in Mentasta care for the elders, they did
10 all the cooking, they were in their teens and 20s and
11 doing everything. They had a little bit of supervision
12 in the kitchen but they did everything. They were out
13 boiling the meat, the bones in the cook shack. They
14 were in the kitchen prepping all the salads and food
15 for everybody. There was a couple hundred people there
16 for a few days. They took care of them. That moose is
17 so important to who we are and what we do.

18
19 I sit here and I've been doing this for
20 close to 30 years now, coming to meetings and trying to
21 fight for our subsistence and protecting our ways of
22 life, I don't know how many -- how many Regional
23 Directors I've been through, that we've had to train
24 and educate on why Alaska's different, especially with
25 the Park Service, BLM, you know, in our ability to hunt
26 and do subsistence to feed our families and can carry
27 on our cultural practices. Every Administration it
28 seems we get a new director and we have to educate you
29 on the laws that fit Alaska, we're not like other
30 states. We have dual management because the State
31 cannot provide for a rural priority and so this public
32 process is an important step to protecting those
33 rights. I was going to say, Mr. Williams, I went white
34 so I can talk longer and stand up in front of these
35 people more too.

36
37 (Laughter)

38
39 MS. LINNELL: I just wanted to say that
40 this body has a duty to protect the rural priority.
41 You have a duty to provide for subsistence needs for
42 rural Alaskans. There are several proposals in front
43 of you to close Federal lands to non-Federally-
44 qualified users. They're looking for that little bit
45 of extra edge on being able to provide for their
46 families. This is a wildlife season on proposals, and
47 we participate in all the different arenas. We
48 participate in the State arena and I get to ball out
49 Ben every now and then at the State level, Ben
50

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1 Mulligan, and I get to do that. But participating
2 there, actively participating in our local Advisory
3 Committees, our Regional Advisory Committees, that's
4 what we have to do in order to protect our hunting and
5 fishing rights. And having ANCSA and having ANILCA
6 watered down, you know, 1972. We're over 50 years now
7 of trying to get this right and the McDowell case made
8 sure that we didn't get a rural priority under the
9 State and we ended up in dual management and here we
10 are and it's not going to get fixed by watering down
11 the Federal Subsistence Board and I'll believe the
12 Constitutional amendment when I see it actually get
13 passed but this is something that they're trying to
14 rush through so don't act on what might happen but act
15 on what's going on right now.

16

17 I'm seeing threats to our habitats and
18 things through executive orders and Secretarial orders
19 that affect the habitat for our moose and our caribou
20 and we need to do what's right for the resource. When
21 you start worrying about taking care of people and
22 doing that, I watch that happen at ADF&G, the Board of
23 Game, they start worrying about people, they start
24 worrying about money even and how many permits from out
25 of state, how many non-resident permits can they sell
26 in their lotteries and drawings because they need to
27 bring money in to the Department and that's not what
28 they're there for. Alaska subsistence needs to be the
29 priority for Alaskan people.

30

31 And I know I've exceeded my time, I
32 want to just thank you for the opportunity to speak
33 this morning.

34

35 Chin'an.

36

37 CHAIRMAN CHRISTIANSON: Thank you for
38 your continued leadership and condolences to you and
39 your community.

40

41 MS. LINNELL: Thank you, sir.

42

43 CHAIRMAN CHRISTIANSON: That concludes
44 public comment this morning. Let's take a five minute
45 break. Oh, next, real quick before we take a break,
46 sorry, we're going to do a comment on -- what was that
47 again?

48

49 MS. LEONETTI: On the consensus agenda.

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1 CHAIRMAN CHRISTIANSON: On the
2 consensus agenda. So this is another opportunity to
3 speak.

4
5 MS. LAVINE: If anyone online wishes to
6 speak to proposals or closure reviews on the consensus
7 agenda listed online you can raise your hand.

8
9 (Pause)

10
11 MS. LAVINE: No hands.

12
13 CHAIRMAN CHRISTIANSON: Thank you.
14 Take a five minute break.

15
16 (Off record)

17
18 (On record)

19
20 CHAIRMAN CHRISTIANSON: Let's get
21 started again here please. If we could take our seats.

22
23 (Pause)

24
25 CHAIRMAN CHRISTIANSON: It looks like
26 WP26-12-13(a)-14(a).

27
28 MS. VOORHEES: Good morning, Mr. Chair.
29 Members of the Board. My name is Hannah Voorhees. It
30 looks like -- oh, good there's the correct slide, thank
31 you. I'm an Anthropologist with OSM and I'll be
32 presenting Proposal WP26-12-13(a)-14(a), which begins
33 on Page 737 of your Board book.

34
35 Proposals 26-12-13(a) submitted by the
36 Native Village of Eyak and Dennis Zadra, respectively,
37 request that the Board recognize the customary and
38 traditional use of brown bears in Unit 6 by residents
39 of Cordova.

40
41 WP26-14(a) submitted by the
42 Southcentral Council requests that the Board recognize
43 the customary and traditional use of brown bears in
44 Unit 6 by residents of Chenega Bay and Tatitlek.

45
46 Native Village of Eyak states that
47 brown bear use is well documented in our local Cordova
48 history and within the tribes traditional storytelling
49 and has been passed down through generations of Eyak
50

1 tribal members who have lived in the area since time
2 immemorial. Dennis Zadra states that residents of
3 Cordova have a deep history of practicing subsistence
4 for brown bears. The Southcentral Council, which
5 submitted WP26-14(a) states that subsistence hunting
6 for brown bears is a time honored practice for the
7 communities of Chenega Bay and Tatitlek.

8

9 Companion Proposal WP26-13(b)/14(b)
10 requests to establish a brown bear hunt in Unit 6 with
11 a harvest limit of one bear by Federal registration
12 permit and a season of August 1st through June 30th and
13 that will be coming before you next, I believe.

14

15 So currently there is no Federal
16 subsistence priority for brown bears in Unit 6.
17 Residents of Cordova already have customary and
18 traditional use determinations for the following
19 species in areas in Unit 6. Black bears and wolves
20 throughout the unit, goats in Units 6A, 6C and 6D and
21 moose in Units 6A, 6B and 6C. Residents of Chenega Bay
22 and Tatitlek already have C&T for several species
23 within Unit 6, including black bears and wolves
24 throughout the unit, goats in 6A, 6C and 6D and moose
25 in Unit 16.

26

27 When considering a customary and
28 traditional use determination analysis eight factors
29 are considered, these are listed beginning on Page 743
30 of your Board book. The Board makes customary and
31 traditional use determinations based on a holistic
32 application of these eight factors as well as the
33 reports and recommendations of the Regional Advisory
34 Council.

35

36 The subsistence practices of residents
37 of Chenega, Tatitlek and Cordova are about the cultural
38 traditions of the Chugach Sugpiaq, Alutiiq of Prince
39 William Sound, the dAXunhyuu Eyak of the Copper River
40 Delta and Russian and American settlers. Subsistence
41 patterns in the region focus on the marine environment
42 but bears and goats were utilized and they were the
43 largest and most important land mammals originally
44 available.

45

46 Native Village of Eyak affirms that
47 brown bears have been traditionally used by their
48 people. Ancestral knowledge, memory and cultural
49 continuity establish that the traditional use of brown
50

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1 bears is an integral part of the regions cultural
2 heritage. Researchers beyond the tribe have, likewise,
3 demonstrated a deep record of brown bear use in the
4 region going back thousands of years which is detailed
5 in the analysis, and this begins on Page 744. I just
6 wanted to flag this, I'm not going to go into all the
7 detail of the archeological sites just for brevity, but
8 there's a robust body of evidence about very deep
9 history of brown bear use in this region. I just want
10 us to keep that in mind because I am going to talk
11 about some more recent interruptions in use since 1900.

12

13

14 So while black bears are still
15 harvested there is less evidence for the use of brown
16 bears in the region since 1900, particularly for
17 Chenega Bay and Tatitlek. The reasons for this are not
18 entirely clear. Looking at Division of Subsistence
19 surveys across study areas between 1985 and 2003, an
20 average of approximately 4 percent of surveyed Cordova
21 households attempted to harvest brown bears and one
22 percent of households were successful. There's one
23 year of data with some harvest locations from 1985 and
24 in that year all the brown bears were harvested in Unit
25 6. During all the years in which Chenega Bay and
26 Tatitlek were surveyed between 1984 and 2003 no
27 households reported harvesting or using brown bears.
28 Chenega Bay was surveyed seven times during this period
29 and Tatitlek was surveyed five times. However, just
30 over six percent of Chenega Bay households attempted to
31 harvest brown bears in two survey years. Brown bear
32 hunting tends to be very specialized and it's possible
33 that some households that harvested brown bears were
34 not included in the surveys or the surveys did not
35 capture harvest for other reasons and regulations may
36 have contributed to harvest of black bears over brown
37 bears in Prince William Sound. The State limit for
38 black bears throughout Unit 6 is one bear. The State
39 limit for brown bears in Unit 6D, which encompasses
40 Prince William Sound, is one brown bear every four
41 regulatory years. The State limit for brown bears is a
42 little bit more liberal in Unit 6A to 6C east of
43 Cordova where hunters can take one brown bear every
44 regulatory year.

45

46 So looking next at reported State
47 harvest, between 1988 and 2023, residents of Cordova
48 harvested a total of 169 brown bears in Unit 6 with
49 most harvest occurring in Units 6B and 6D. During the

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1 same time residents of Chenega Bay and Tatitlek did not
2 report harvesting any brown bears within the units.
3 There are no brown bear sealing records for Chenega Bay
4 in Unit 6 for any year in ADF&G's records although two
5 brown bears were sealed for Tatitlek in Unit 6, one in
6 1984 and one in 1985.

7

8 The OSM conclusion is to support these
9 proposals. In addition to testimony from the Native
10 Village of Eyak there's strong ethnographic and
11 archeological evidence that both brown and black bears
12 play an essential role in Chugach Sugpiaq, Alutiiq and
13 dAXunhyuu Eyak culture and alignment with the eight
14 factors.

15

16 Since 1900 there's more evidence of use
17 of black bears than brown bears particularly for
18 Chenega Bay and Tatitlek. However, subsistence
19 practices are characterized for their adaptability and
20 shifting use of brown and black bears may reflect local
21 preference, shifting opportunity as well as external
22 constraints. Under Federal Subsistence regulations,
23 residents of Cordova, Chenega Bay and Tatitlek already
24 have C&T for black bears throughout Unit 6. Based on
25 this and other determinations for land mammals in the
26 region the three communities have already established a
27 recognized pattern of harvest and use of wild resources
28 in Unit 6 consistent with the eight factors.

29

30 Thank you. That completes my
31 presentation and I'm happy to take any questions.

32

33 CHAIRMAN CHRISTIANSON: Thank you for
34 the presentation, Staff. Any questions for Staff.

35

36 (No comments)

37

38 CHAIRMAN CHRISTIANSON: Hearing and
39 seeing none, any written comment -- public written
40 comments received.

41

42 MS. VOORHEES: Mr. Chair, this is
43 Hannah Voorhees. There were no written public
44 comments.

45

46 CHAIRMAN CHRISTIANSON: Thank you.
47 Summary of tribal government and Alaska Native Corp.

48

49 MR. LIND: Good morning, Mr. Chair.

50

0582

1 Orville Lind, Native Liaison for OSM. During the
2 consultation sessions there were no comments or
3 questions on this proposal. Thank you.

4
5 CHAIRMAN CHRISTIANSON: Thank you,
6 Orville. Tribal, Alaska Native organization testimony.

7
8 MS. LAVINE: If you are representing a
9 tribe or Alaska Native -- oh, we have somebody in the
10 room -- please.

11
12 MR. SMITH: Hi, I'm Jim Smith
13 representing NVE, Native Village of Eyak. We support
14 this. Brown bear has been traditional to the Eyak
15 people and the Sugpiaq people and so we put this one
16 forward alongside our relatives in Chenega.

17
18 Thank you.

19
20 CHAIRMAN CHRISTIANSON: Thank you, Mr.
21 Smith. Advisory Group, SRC, State Advisory Committee,
22 multiagency work group.

23
24 MS. LAVINE: We received no comment on
25 those proposals.

26
27 CHAIRMAN CHRISTIANSON: Thank you. Any
28 public testimony here or online please raise your hand.

29
30 MS. LAVINE: In the room we have
31 Michael Opheim or Dustin Carl -- oh, I'm sorry, not for
32 this -- are you signed up for this one -- yes, very
33 good, okay.

34
35 MR. OPHEIM: Good morning Board. Thank
36 you for the opportunity to speak on WP26-12, 13(a),
37 14(a). My name is Michael Opheim. I'm the Tribal Fish
38 and Wildlife Liaison for our tribal Fish and Wildlife
39 Department at Chugach Regional Resources Commission and
40 happy to give our testimony.

41
42 The Chugach Regional Resources
43 Commission would like to voice the support for WP26-12,
44 13(a) and 14(a). The Chugach Regional Resources
45 Commission or CRRC serves the seven tribes of the
46 Chugach Region in Southcentral Alaska; the Native
47 Village of Eyak, Valdez Native Tribe, Native Village of
48 Tatitlek, Chenega IRA Council, Qutekcak Native Tribe,
49 Port Graham Village Council and the Nanwalek IRA
50

0583

1 Council. The proposals recognize the customary and
2 traditional use of brown bears by residents of Cordova,
3 Chenega Bay, and Tatitlek. The residents of these
4 tribal communities have traditionally used bear harvest
5 for food and clothing as recorded throughout the
6 history by the tribes traditional storytelling and the
7 C&T determination should reflect that.

8

9 Thank you for your time.

10

11 CHAIRMAN CHRISTIANSON: Thank you for
12 your testimony. Hearing or seeing no other public
13 testimony, Council recommendation.

14

15 MS. CAMINER: Thank you, Mr. Chair.
16 These proposals are beneficial to subsistence users.
17 The C&T is well justified. As Michael mentioned we
18 heard a lot of testimony to that and the OSM analysis
19 is quite thorough and keeps the door open for
20 subsistence users to perhaps switch to other resources,
21 as needed, due to the fluctuation of resources and
22 their availability. There's a long history of brown
23 bear use in Unit 6 documented orally and written in
24 historical records.

25

26 The Southcentral RAC takes C&T
27 determinations really seriously and we particularly
28 appreciate it when those communities affected come to
29 our meeting, as happened here, and explained it a
30 little bit better to us, their personal and historical
31 use.

32

33 So, once, again, this is beneficial to
34 subsistence users and we would support it.

35

36 CHAIRMAN CHRISTIANSON: Thank you,
37 Judy. Alaska Department of Fish and Game.

38

39 MR. MULLIGAN: Thank you, Mr. Chair.
40 For the record, the Alaska Department of Fish and Game
41 opposes the proposals. Currently under State
42 regulations we have a negative C&T finding for Unit 6
43 brown bear.

44

45 Thank you.

46

47 CHAIRMAN CHRISTIANSON: Thank you, Ben.
48 InterAgency Staff Committee comment.

49

50

1 MS. LAVINE: Thank you, Mr. Chair.
2 I'll read an abbreviated comment. The full comment can
3 be found in your meeting materials.

4
5 The Board makes customary and
6 traditional use determinations for the sole purpose of
7 recognizing the pool of users who generally exhibit
8 some or all of the eight factors. The Board does not
9 use such determinations for resource management or
10 restricting harvest.

11
12 Thank you, Mr. Chair.

13
14 CHAIRMAN CHRISTIANSON: Thank you.
15 Board discussion with Liaison, Council Chairs, State
16 rep.

17
18 (No comments)

19
20 CHAIRMAN CHRISTIANSON: Hearing and
21 seeing none, open the floor for Board action.

22
23 MR. INGERSOLL: Mr. Chair. The Forest
24 Service moves to adopt WP26-12, 13(a), 14(a), following
25 a second I'll explain why I intend to support the
26 motion.

27
28 MR. STRIKER: Park Service seconds.

29
30 MR. WOODS: Second.

31
32 MR. INGERSOLL: Thank you for seconds
33 and thirds, right. I support this motion in deference
34 to the RAC and in acknowledgement of the testimony of
35 the Native Village of Eyak and the long history of oral
36 tradition and archeological evidence in support of this
37 determination. Even though recent harvest of brown
38 bears has not been as much as it perhaps was in the
39 past, the customary and traditional use determination
40 is based on the long history and there's an opportunity
41 here for subsistence users to shift their use of
42 resources over time.

43
44 Thank you.

45
46 CHAIRMAN CHRISTIANSON: Any other Board
47 comments, discussion, deliberation.

48
49 (No comments)

0585

1 CHAIRMAN CHRISTIANSON: Hearing and
2 seeing none, we'll go ahead and read into the record
3 the motion and roll call.

4

5 MS. LEONETTI: Okay. The motion is to
6 adopt Wildlife Proposal 26-12, 13(a) and 14(a).

7

8 Forest Service Member Ingersoll.

9

10 MR. INGERSOLL: Support.

11

12 MS. LEONETTI: Public Member Pitka.

13

14 MS. PITKA: I support as outlined and
15 in deference to the Southcentral Alaska Subsistence
16 Regional Advisory Council.

17

18 MS. LEONETTI: Forest Service -- or,
19 Fish and Wildlife Service, Member Boario.

20

21 MS. BOARIO: Fish and Wildlife Service
22 supports for the reasons outlined by the OSM
23 justification which underscores just that we are
24 stepping into a story that is thousands of years long
25 and I appreciate the write up and also as articulated
26 by the Forest Service and in deference to the
27 Southcentral RAC.

28

29 MS. LEONETTI: BIA Member John.

30

31 MS. JOHN: BIA votes to adopt WP26-12,
32 13(a), 14(a) in support of the motion made by the
33 Forest Service. This gives deference to the
34 recommendation of the Southcentral RAC on the C&T
35 determinations and proposals and we concur with the
36 Councils justification for each of them.

37

38 Quyana.

39

40 MS. LEONETTI: Public Member Oney.

41

42 MR. ONEY: Public Member Ray Oney moves
43 to adopt WP26-12, 13(a) and 14(a) as testimonies from
44 Eyak and supported by Southcentral RAC.

45

46 MS. LEONETTI: Public Member Woods.

47

48 MR. WOODS: Public Member Woods
49 approved for all the reasons above and the RAC and
50

0586

1 OSM's analysis. Thank you.

2

3 MS. LEONETTI: Public Member Payenna.

4

5 MR. PAYENNA: Public Member Payenna
6 supports WP26-12, 13(a) and 14(a) in deference to the
7 RAC.

8

9 MS. LEONETTI: BLM Member Pendergast.

10

11 MR. PENDERGAST: BLM supports for the
12 reasons stated by the U.S. Forest Service. Thank you.

13

14 MS. LEONETTI: Park Service Member
15 Striker.

16

17 MR. STRIKER: Park Service supports in
18 deference to the RAC for the reasons summarized by my
19 Forest Service colleague.

20

21 MS. LEONETTI: Chair Christianson.

22

23 CHAIRMAN CHRISTIANSON: I support.

24

25 MS. LEONETTI: Mr. Chair. The motion
26 passes unanimously.

27

28 CHAIRMAN CHRISTIANSON: Thank you.

29 We'll move on to WP26-13(b), 14(b).

30

31 MS. HOLMAN: Good morning, Mr. Chair.
32 Members of the Board. Kendra Holman for the record,
33 Wildlife Biologist with OSM. This will be for Wildlife
34 Proposal WP26-13(b) and 14(b) -- can be found starting
35 on Page 757 of your meeting book.

36

37 You heard kind of a little bit about
38 who submitted these proposals and what they're asking
39 for. Specifically these -- this one covers the
40 establishment of the brown bear hunts in Units 6C -- or
41 excuse me, 6 -- I'm not sure what I put there -- with a
42 harvest limit of one bear by Federal registration
43 permit and a season of August 1st through June 30th.
44 Both of these proponents state that a time honored
45 subsistence practice of brown bears in Prince William
46 Sound date far back. Most of Prince William Sound
47 consists of Federal public lands, which consist of --
48 which are -- which contain robust brown bear
49 populations that can withstand limited Federal harvest
50

1 and provide subsistence opportunity.

2

3

4 So the regulatory history. The last
5 Federal Subsistence regulatory change for brown bears
6 in Unit 6 was in the early 1990s. Biologically brown
7 bears can be found throughout most of Unit 6, including
8 Hinchinbrook, Montague, Hawkins and Kayak Islands and a
9 -- and the portion of Unit 6D East of the Columbia
10 Glacier to Icy Bay on the mainland. No population data
11 exists. Population data is -- full population data
12 exists because it's sparse for brown bears in Unit 6 so
13 a conservative approach to managing them is warranted.

13

14

15 No permits or harvest tickets are
16 required to hunt brown bears in Unit 6A, 6B, 6C or D
17 Remainder under State regulations, while a registration
18 permit is required to hunt brown bears in Unit 6D
19 Montague Island. All harvested brown bears are
20 required to be sealed within 30 days of the kill and
21 provide harvest information. Table 1 on Page 763 of
22 your meeting book shows the harvest of brown bear in
23 Unit 6 broken down by subunit most -- with most of the
24 bears Units -- in Unit 6 -- in Unit 6 -- harvested in
25 6D and 6A. 6A is primarily guided participants and 6D
26 is participation by non-local Alaskans who hunt without
27 a gu -- has more participation of non-local Alaskans
28 who hunt without a guide. Non-residents and non-local
29 residents account for 88 percent of the Unit 6 brown
30 bear harvest between 2014 and 2023. Unit-wide local
31 residents, so residents of Unit 6C, not including the
32 non-rural community of Valdez, harvested an average of
33 6.2 bears per year from 2014 to 2023 accounting for 12
34 percent of the harvest during the same time period.

34

35

36 One alternative considered was to
37 delegate authority to the Federal in-season manager to
38 limit the number of permits issued. This could be done
39 through a first come, first serve registration permits
40 or through a random draw. Permits could be limited by
41 subunit requiring division of Unit 6 into multiple hunt
42 areas. While local residents harvest few bears under
43 State regulations the proposed Federal season is longer
44 than existing State seasons and the harvest limit is
45 higher for Unit 6D. The Federal season would open
46 August 1st through June 30th. Unit 6, while the State
47 season opens September 1st in Unit 6A, 6B and 6C, and
48 October 15th in Unit 6D. Brown bear harvest during
49 early October and September may be higher as bears are
50 concentrated near salmon streams and deer hunters may

50

0588

1 harvest a brown bear opportunistically while hunting
2 deer or if a brown bear threatens their deer kill.

3

4

5 If Proposal WP26-13(b) and 14(b) were
6 adopted Federal brown bear hunt would be established in
7 Unit 6 increasing subsistence opportunity. Impacts to
8 the brown bear population is uncertain as there is
9 little biological information regarding brown bears in
10 Unit 6 so a conservative approach to managing them is
11 warranted.

11

12

13 This proposal increases subsistence
14 opportunity. Harvest pressure is expected to be very
15 low and there is no conservation concern in Unit 6A, 6B
16 and 6C. The additional Federal subsistence hunting
17 opportunity during August and late June is not expected
18 to substantially increase harvest and provide a
19 subsistence opportunity. Limiting the number of
20 permits issued in Unit 6D balances subsistence
21 opportunity with conservation concerns and provides a
22 safeguard against over harvest.

22

23

24 So the OSM conclusion is to support
25 with modification to divide Unit 6 into two hunt areas
26 and delegate authority to the Cordova Ranger District
27 to set or adjust annual harvest quotas determined by
28 permit type and limit the number of permits issued in
29 6D.

29

30

31 Thank you, Mr. Chair, Members of the
32 Board. I'd be happy to address any questions.

32

33

34 CHAIRMAN CHRISTIANSON: Thank you.
35 Thank you for the presentation. Any questions for
36 Staff on this proposal.

36

37

38

39 (No comments)
40 CHAIRMAN CHRISTIANSON: Was there any
41 written public comment received?

41

42

43 MS. HOLMAN: Mr. Chair, there was no
44 written public comment received on this proposal.

44

45

46 CHAIRMAN CHRISTIANSON: Thank you.
47 Summary of tribal government, Alaska Native Corp.

47

48

49 MR. LIND: Thank you, Mr. Chair. There
50 were no comments or questions. Thank you.

50

0589

1 CHAIRMAN CHRISTIANSON: This is the
2 opportunity for tribal and Alaska Native organization
3 testimony.

4
5 (No comments)

6
7 CHAIRMAN CHRISTIANSON: Hearing and
8 seeing none.....

9
10 MS. LAVINE: Wait, Mr. Chair.....

11
12 CHAIRMAN CHRISTIANSON: Oh, you have
13 one.

14
15 MS. LAVINE: Mr. Chair, I do believe
16 Michael Opheim is.....

17
18 CHAIRMAN CHRISTIANSON: Oh, Michael,
19 you have the floor, yes.

20
21 MR. OPHEIM: Good morning again. Thank
22 you for the opportunity. My name is Michael Opheim.
23 I'm the Tribal Fish and Wildlife Liaison for our tribal
24 Fish and Wildlife Department at Chugach Regional
25 Resources Commission and we'd like to show our support
26 for WP26-13(b) and 14(b) for the same reason as the
27 previous proposals.

28
29 The residents of these tribal
30 communities have traditionally used bear harvest for
31 food and clothing as recorded throughout history by the
32 tribes traditional storytelling and the C&T
33 determination should reflect that.

34
35 Thank you for your time.

36
37 CHAIRMAN CHRISTIANSON: Thank you for
38 your testimony, appreciate that. Any other testimony.

39
40 (No comments)

41
42 CHAIRMAN CHRISTIANSON: No. Advisory
43 group, RAC, SRC, multiagency working group.

44
45 MS. LAVINE: We received no comments.

46
47 CHAIRMAN CHRISTIANSON: Thank you. Any
48 public testimony here or online please raise your hand.

49
50

0590

1 (No comments)

2

3

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50

(No comments)

CHAIRMAN CHRISTIANSON: Hearing or seeing none, Council recommendation.

MS. CAMINER: Thank you, Mr. Chair. Now that the Board has established a C&T, the next step usually is Federal hunt and a State is already allowed so it seems fitting that a Federal hunt would be established as well.

We did have some concerns about the brown bear populations but noted that the harvest limit of one bear is reasonable and conservative. Providing additional subsistence opportunities is important and the Federal manager can assess the season how best to manage this hunt in 6D. Providing additional subsistence opportunities is important. We have confidence in the Federal manager to assess in-season how best to manage. The analysis was thorough for the C&T so one bear is good, conservative and additional opportunity for subsistence users.

Thank you.

CHAIRMAN CHRISTIANSON: Thank you, Judy. Alaska Department of Fish and Game.

MR. MULLIGAN: Thank you, Mr. Chair. For the record, the Alaska Department of Fish and Game opposes this as it misaligns State and Federal regulations and even the OSM recommendation. Just for the record we manage brown bears, not by just splitting the unit, we have a separate regulatory structure for subunit A, B and C, which is one bear every regulatory year, but then specifically in 6D, Montague Island, we have registration hunts that occur there and it's one bear every four regulatory years, and the same for 6D Remainder. And looking at the latest management report that we have from Staff, that is done every four regulatory years because of population concerns and overharvest.

Thank you.

Oh, sorry, one more thing.

We encourage a robust consultation if this is adopted given if you do adopt a differing

0591

1 management scheme with only two hunts as opposed to
2 ours and given the population concerns within 6D.

3

4 Thank you.

5

6 CHAIRMAN CHRISTIANSON: Thank you, Ben.
7 InterAgency Staff Committee.

8

9 MS. LAVINE: Yes, Mr. Chair. I was
10 reminded that yesterday Mr. Dennis Zadra commented on
11 this proposal and expressed his disapproval of the
12 August part of the season. And for the ISC comment, we
13 provided the standard comment.

14

15 Thank you, Mr. Chair.

16

17 CHAIRMAN CHRISTIANSON: Thank you,
18 Robbin. Board discussion with the Liaison, Council
19 Chair, State rep, opportunity to ask a pointed
20 question, clarification.

21

22 (No comments)

23

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

26

27 MR. INGERSOLL: Mr. Chair, the Forest
28 Service moves to adopt WP26-13(b) and 14(b), following
29 a -- as modified by the Office of Subsistence
30 Management, specifically to divide Unit 6 into two hunt
31 areas and delegate authority to the Cordova District
32 Ranger to set or adjust annual harvest quotas with
33 robust consultation with the State of Alaska and
34 determine the type of permits and determine the number
35 of permits issued in Unit 6D. If I get a second I'll
36 explain my rationale.

37

38 MR. STRIKER: Park Service seconds.

39

40 MR. INGERSOLL: Mr. Chair. This would
41 provide for a subsistence priority within Unit 6 for
42 brown bears. Harvest pressure is expected to be very
43 low and the record reflects that local use is
44 approximately 12 percent of the historic use there and
45 providing a local subsistence priority through this
46 action would fulfill the purposes of ANILCA and
47 delegation of authority by letter and Forest Service
48 commits to robust consultation with the State of Alaska
49 in managing that season.

50

0592

1 Thank you.

2

3 CHAIRMAN CHRISTIANSON: Thank you,
4 Jerry. Any other Board discussion, deliberation.

5

6 (No comments)

7

8 CHAIRMAN CHRISTIANSON: Hearing and
9 seeing none, please read into the record the motion and
10 roll call.

11

12 MS. LEONETTI: The motion is to adopt
13 Wildlife Proposal 26-13(b) and 14(b) as modified by OSM
14 to divide Unit 6 into two hunt areas and delegate
15 authority to the Cordova District Ranger with robust
16 consultation with ADF&G to set or adjust annual harvest
17 quotas, determine the type of permits and limit the
18 number of permits issued in Unit 6D via delegation of
19 authority letter only.

20

21 Forest Service Member Ingersoll.

22

23 MR. INGERSOLL: Supports.

24

25 MS. LEONETTI: Park Service Member
26 Striker.

27

28 MR. STRIKER: The Park Service supports
29 in deference to the RAC for the reasons enumerated by
30 Regional Forester Ingersoll including his commitment to
31 robust consultation with the State.

32

33 MS. LEONETTI: BLM Member Pendergast.

34

35 MR. PENDERGAST: BLM supports for the
36 reasons stated by the Forest Service.

37

38 MS. LEONETTI: Public Member Payenna.

39

40 MR. PAYENNA: Public Member Payenna
41 supports for reasons articulated by the Forest Service
42 and in deference to the RAC.

43

44 MS. LEONETTI: Public Member Woods.

45

46 MR. WOODS: Public Member Woods
47 supports with the robust coordination with the State of
48 Alaska along with the recommendations by the RAC and
49 Forest Service.

50

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1 MS. LEONETTI: Public Member Oney.

2

3 MR. ONEY: Public Member Ray Oney moves
4 to support as modified by OSM WP-26-13(b) and 14(b) and
5 supported by Southcentral RAC.

6

7 MS. LEONETTI: BIA Member John.

8

9 MS. JOHN: BIA votes to adopt WP26-
10 13(b) and 14(b) in support of the motion made by Forest
11 Service. This gives deference to the Southcentral RAC
12 recommendations on these brown bear harvest proposals.
13 We concur with the Council's justification for each of
14 them and thank them for their efforts to provide the
15 subsistence opportunities to rural users.

16

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

19

20 MS. BOARIO: Fish and Wildlife Service
21 supports with OSM modification and for the reasons
22 justified by the Forest Service. And we recognize that
23 the Southcentral RAC supports one bear as a
24 conservative approach and harvest pressure is expected
25 to be low. This will provide subsistence opportunity.

26

27 MS. LEONETTI: Public Member Pitka.

28

29 MS. PITKA: I vote to support as
30 modified by OSM and in deference to the Regional
31 Advisory Council and as outlined by the Forest Service.

32

33 MS. LEONETTI: Chair Christianson.

34

35 CHAIRMAN CHRISTIANSON: I support.

36

37 MS. LEONETTI: Mr. Chair, the motion
38 passes unanimously.

39

40 CHAIRMAN CHRISTIANSON: Thank you.
41 Next we'll move on to WP26-16.

42

43 MR. UBELAKER: Good morning, Mr. Chair.
44 Board Members. For the record, Brian Ubelaker and I
45 will be providing you a brief summary of the analysis
46 of Wildlife Proposal 26-16, which can be found on Page
47 787 of your meeting materials.

48

49 This proposal was submitted by the

50

1 Southcentral Alaska Subsistence Regional Advisory
2 Council and requests two changes to Federal beaver
3 hunting regulations in Unit 6. First, it asks to
4 increase the possession limit from one beaver to three;
5 the second, to extend the hunting season from the
6 current May through October to a yearround season. The
7 proponent states the intent is to better align with
8 traditional subsistence practices which is more
9 opportunistic in nature.

10

11 Currently, the Federal harvest limit is
12 one beaver per day with only one in possession from May
13 through October. Federal trapping regulations allow
14 unlimited harvest from December through April. There
15 is no State beaver hunting season in Unit 6 but there
16 is no limit during the November through April trapping
17 season. Beaver are not rigorously surveyed in Unit 6
18 and most information comes from incidental
19 observations, trapper reports and sealing records.
20 Based on this information beaver are considered
21 abundant in Unit 6 especially in Subunits 6A through 6C
22 and there are no indications of population decline.
23 Harvest is estimated as sustainable averaging about 60
24 beaver a year since 2002, of which over 90 percent are
25 taken by trapping. Very few beaver are harvested by
26 firearms.

27

28 If adopted, this proposal would allow
29 Federally-qualified subsistence users to hunt beaver
30 yearround and keep up to three in possession at a time.
31 Because trapping already allows unlimited harvest and
32 very few beaver are taken under hunting regulations,
33 only a minimal increase in harvest is expected. No
34 conservation concerns have been identified and Unit 6
35 is about 75 percent Federal public lands, these changes
36 would benefit a wide range of subsistence users.

37

38 Therefore, OSM's conclusion is to
39 support this proposal as it increases subsistence
40 opportunity, supports traditional harvest practices and
41 poses no conservation concerns.

42

43 And, with that, I'm happy for
44 questions.

45

46 CHAIRMAN CHRISTIANSON: Thank you,
47 Brian. Any questions for Staff.

48

49 (No comments)

50

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1 CHAIRMAN CHRISTIANSON: Hearing or
2 seeing none, any written public comment.

3
4 MR. UBELAKER: No, Mr. Chair.

5
6 CHAIRMAN CHRISTIANSON: Thank you,
7 appreciate that. Summary of tribal government and
8 Alaska Native Corporation consultation.

9
10 MR. LIND: Thank you, Mr. Chair. There
11 were no comments or questions on this proposal. Thank
12 you.

13
14 CHAIRMAN CHRISTIANSON: Thank you. Any
15 ACs, SRCs, State Advisory or multiagency workgroup.

16
17 MS. LAVINE: We did not receive
18 comments, Mr. Chair.

19
20 CHAIRMAN CHRISTIANSON: Any public like
21 to testify here or online please raise your hand.

22
23 (No comments)

24
25 CHAIRMAN CHRISTIANSON: Seeing or
26 hearing none, Council recommendation on this.

27
28 MS. CAMINER: Thank you very much, Mr.
29 Chair. Judy Caminer from the Southcentral RAC. About 60
30 beaver have been taken, which isn't very much
31 considering the large area we're talking about. People
32 felt that beaver are abundant and no conservation
33 concern. Fish and Game had no comments, again, might
34 have been a timing problem on that. We also said that
35 people, when they're spending time out in the field,
36 would be -- it would be easier, better for them to --
37 if they're unable to process their take right away,
38 it's better to have a higher limit, or more in
39 possession I'll say. Also we felt that local users
40 certainly utilize beaver for food as well as for fur
41 and there are no conservation concerns.

42
43 Thank you very much.

44
45 CHAIRMAN CHRISTIANSON: Thank you,
46 Judy. Kodiak.

47
48 MS. SKINNER: Rebecca Skinner for the
49 Kodiak/Aleutians RAC. We did discuss this proposal
50

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1 because our people from our area have the ability to
2 hunt beaver in Unit 6. In discussion we noted that
3 people from our area don't tend to hunt beaver in Unit
4 6 and we deferred to the home RAC, Southcentral RAC to
5 make a determination. Thanks.

6
7 CHAIRMAN CHRISTIANSON: Thank you.
8 Alaska Department of Fish and Game.

9
10 MR. MULLIGAN: Thank you, Mr. Chair.
11 For the record the Alaska Department of Fish and Game
12 opposes the proposal as it misaligns State and Federal
13 regulations. As you've heard there's currently no open
14 season in GMU 6 under State regulations to hunt beaver.
15 However, there is beaver trapping under State
16 regulations from November 10th to April 30th, no limit,
17 and a beaver can be taken with steel trap, snare,
18 firearm or bow and arrow. There is a sealing
19 requirement as well.

20
21 Thank you, Mr. Chair.

22
23 CHAIRMAN CHRISTIANSON: Thank you, Ben.
24 InterAgency Staff Committee.

25
26 MS. LAVINE: Mr. Chair. The
27 InterAgency Staff Committee provided the standard
28 comment.

29
30 CHAIRMAN CHRISTIANSON: Thank you.
31 Board discussion, any questions.

32
33 MR. INGERSOLL: Mr. Chair.

34
35 CHAIRMAN CHRISTIANSON: You have the
36 floor.

37
38 MR. INGERSOLL: To the Advisory
39 Council, would you consider making an aligned proposal
40 to the Board of Game to address the inconsistency in
41 regulation?

42
43 MS. CAMINER: I can certainly bring
44 that up to the RAC, thank you for the suggestion.

45
46 CHAIRMAN CHRISTIANSON: Thank you.
47 Hearing and seeing no more comments we'll go ahead and
48 move for Board action.

49
50

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1 MR. INGERSOLL: Mr. Chair. The Forest
2 Service moves to adopt WP26-16. If I get a second I'll
3 explain why I intend to support my motion.

4
5 MR. PENDERGAST: BLM seconds.
6

7 MR. INGERSOLL: Thank you. Forest
8 Service supports this proposal in deference to the
9 Advisory Councils and because yearround beaver hunting
10 is a traditional cultural practice and there are no
11 conservation concerns. Thank you.

12
13 CHAIRMAN CHRISTIANSON: Thank you. Any
14 further Board discussion or deliberation.

15
16 Frank.

17
18 MR. WOODS: One comment for the RAC and
19 participation of the ADF&G. We have the same problem
20 with beaver back home is that number 1, there's
21 trappers and we have avid hunters in the fall, looks
22 like this proposal is to help satisfy a subsistence
23 need. Separate, I'll guarantee you that subsistence
24 beaver tastes better than the sports or commercial
25 beaver.

26
27 (Laughter)

28
29 MR. WOODS: That's a joke. Back home
30 we prize that as red meat especially in the spring or
31 fall I could say, especially when you're camping and
32 out hunting and then provides the opportunity to
33 families to provide red meat. So anything we could do
34 to help that I'm in support. And I'd encourage the RAC
35 to work -- at some point to robustly work with ADF&G to
36 align those proposals because I think Dan can concur
37 that the beaver proposal just before the ACs has been
38 long due but it's a lot of work. So thank you.

39
40 CHAIRMAN CHRISTIANSON: Any other Board
41 comment, deliberation.

42
43 (No comments)

44
45 CHAIRMAN CHRISTIANSON: Hearing and
46 seeing none, please read into the record and roll call.

47
48 MS. LEONETTI: The motion is to adopt
49 Wildlife Proposal 26-16.

50

0598

1 Forest Service Member Ingersoll.

2

3 MR. INGERSOLL: Support.

4

5 MS. LEONETTI: Public Member Pitka.

6

7 MS. PITKA: I support WP26-16 in
8 deference to the Regional Advisory Council and as
9 outlined. Thank you.

10

11 MS. LEONETTI: Fish and Wildlife
12 Service Member Boario.

13

14 MS. BOARIO: Fish and Wildlife Service
15 supports as outlined by the Forest Service
16 justification acknowledging that local subsistence
17 users use beaver for food and their food and there are
18 no conservation concerns and in deference to the RAC.

19

20 MS. LEONETTI: BIA Member John.

21

22 MS. JOHN: BIA votes to adopt WP26-16
23 in support of the motion made by the Forest Service.
24 This gives deference to the Southcentral Alaska RAC.
25 And recommendations on this beaver harvest proposal, we
26 concur with the Councils justification as well.

27

28 MS. LEONETTI: Public Member Oney.

29

30 MR. ONEY: Public Member Ray Oney moves
31 to support WP26-16 which is outlined by Southcentral
32 RAC and in support by OSM and no conservation concerns.

33

34 MS. LEONETTI: Public Member Woods.

35

36 MR. WOODS: Public Member Woods
37 approves.

38

39 MS. LEONETTI: Public Member Payenna.

40

41 MR. PAYENNA: Public Member Payenna
42 supports WP26-16 in deference to the RAC.

43

44 MS. LEONETTI: BLM Member Pendergast.

45

46 MR. PENDERGAST: BLM supports for the
47 reasons already stated by my colleagues.

48

49 MS. LEONETTI: Park Service Member

50

0599

1 Striker.

2

3 MR. STRIKER: Park Service supports in
4 deference to the RAC and for the reasons outlined by
5 the Forest Service.

6

7 MS. LEONETTI: Chair Christianson.

8

9 CHAIRMAN CHRISTIANSON: I support.

10

11 MS. LEONETTI: Mr. Chair, the motion
12 passes unanimously.

13

14 CHAIRMAN CHRISTIANSON: Next we'll call
15 WP26-17.

16

17 MR. SANDERS: Good morning, Mr. Chair.
18 Members of the Board. My name is Andrew Sanders and
19 I'm a Biologist with the Chugach National Forest. I'll
20 be presenting WP26-17, which begins on Page 797 of your
21 meeting materials.

22

23 This proposal was submitted by Onie
24 Wilkes of Cooper Landing and requests the creation of a
25 late fall season for moose in Unit 7 from October 20th
26 to November 10th. The proponent states that residents
27 of Cooper Landing are allowed to hunt moose in both
28 Unit 7 and Unit 15B but that there's only an additional
29 late fall season in Unit 15B. Establishing the same
30 late fall season in Unit 7 would allow Cooper Landing
31 residents the opportunity to participate in the late
32 fall season hunt closer to home where they customarily
33 and traditionally hunt. Rural residents of Chenega
34 Bay, Cooper Landing, Moose Pass, Hope and Tatitlek have
35 C&T for moose in Unit 7.

36

37 A moose population estimate has never
38 been performed moose in Unit 7. Trend counts have been
39 conducted every other year since the 1990s and have
40 been declining since then. Taken with other historic
41 data the Unit 7 moose herd appears to have been
42 declining since the 1970s. The most recent demographic
43 survey was performed in 2013 and indicated a population
44 in decline with a low calf to cow ratio. Unit 7 is
45 very mountainous and below Alpine and is primarily
46 mature Forest in late successional stages with some
47 extensive areas of spruce beetle kill. Poor habitat
48 due to Forest succession is suspected of being the
49 limiting factor for the Unit 7 moose population,
50

0600

1 however, U.S. Forest Service active Forest management
2 in areas of spruce beetle kill is resulting in patches
3 of early seroral* habitat that are expected to benefit
4 moose. Severe winters with heavy snow are normal in
5 the Kenai mountains. During winter Unit 7 moose are
6 observed to concentrate in low elevation areas with
7 lower snow depth and more winter browse. These areas
8 are near roads and railroads and approximately 23 moose
9 are killed by motor vehicle and train strikes each
10 year.

11
12 I'd like to include some cultural
13 knowledge and traditional practices.

14
15 Present day Unit 7 Remainder overlaps
16 with the traditional territory of the Dena'ina
17 Athascans of the Northern Kenai Peninsula and the
18 Alutiiq of the outer Kenai Peninsula Coast and
19 neighboring Prince William Sound. Dena'ina oral
20 traditional and historical reports indicate that
21 caribou were the dominant ungulate on the Kenai
22 Peninsula until large wildfires in the 1880s and that
23 moose were scarce or unknown throughout most of their
24 territory until around that same time. A comprehensive
25 subsistence survey was performed in Cooper Landing
26 during the winter of 1990/1991 and found that moose
27 were the most widely used land mammal in the community.
28 Hope Sunrise was surveyed in 1991 and residents
29 reported that prior to the implementation of
30 regulations mandating hunting seasons moose were
31 traditionally hunted in late October or early November.

32
33 Moose harvest in Unit 7 Remainder
34 occurs under Federal regulations by a Federal
35 registration permit and under State regulations by
36 harvest ticket. Federal moose harvest in Unit 7 has
37 ranged from zero to 7 moose since Moose Pass received
38 customary and traditional use. The average reported
39 combined harvest for both State and Federal hunts
40 during the most recent five year period was 22.6 moose,
41 which is up from 20 moose during the previous five year
42 period but still far below the historic average of 104
43 moose per year.

44
45 Currently, subsistence priority is
46 provided by opening the Federal season 11 days before
47 the State season and allowing the harvest of bulls with
48 forked antlers in addition to the spike 50-inch or
49 three brow tine antler restriction in the State hunt.
50

0601

1 An additional late fall season would provide increased
2 moose harvest opportunity to Federally-qualified
3 subsistence users and would provide opportunity to
4 harvest during cooler weather. It could also increase
5 harvest success by allowing hunters to target moose
6 that early winter conditions have concentrated in the
7 low elevation habitat. It would also align season
8 dates with Unit 15B simplifying management. However,
9 the moose population in Unit 7 appears to be decreasing
10 and stressed by limited winter habitat. Additionally,
11 approximately one moose is killed by train and motor
12 vehicle strike in Unit 7 for every moose taken by
13 hunters. A late season hunt could create a
14 conservation concern by significantly increasing
15 harvest success and placing additional stress on the
16 moose.

17
18 The OSM preliminary conclusion is to
19 oppose Proposal WP26-17.

20
21 While adoption of Proposal WP26-17
22 would provide greater opportunity to Federally-
23 qualified subsistence users, the limited data available
24 for Unit 7 moose raises concerns about whether the
25 population could support additional harvest pressure.
26 The Unit 7 moose population appears to occur at low
27 density due to habitat limitations and is possibly
28 declining. Federally-qualified users currently have
29 priority through an early season and reduced antler
30 restrictions, therefore, conservative management is
31 warranted and additional harvest pressure is not
32 recommended at this time.

33
34 Thank you.

35
36 CHAIRMAN CHRISTIANSON: Thank you,
37 Andrew. Any questions for Staff on the presentation.

38
39 MS. BOARIO: Mr. Chair.

40
41 CHAIRMAN CHRISTIANSON: Yes, go ahead.

42
43 MS. BOARIO: Question, thank you.

44
45 CHAIRMAN CHRISTIANSON: Sure.

46
47 MS. BOARIO: And I apologize if others
48 need to answer this because I see information in two
49 sections and I just want to make sure I'm tracking.
50

0602

1 So as you recounted, the limited data
2 available suggests a potential conservation concern,
3 that's on Page 806. And then on Page 811 under the ISC
4 comment it says, current State data suggests that there
5 is a conservation concern. And so I'm trying to make
6 sure I'm following.

7

8 MR. SANDERS: I think I'll defer to the
9 State on why they.....

10

11 MS. BOARIO: Totally fine.

12

13 MR. SANDERS:came to that
14 conclusion.

15

16 MS. BOARIO: Well, it's under the ISC
17 section so just noted, whoever needs to answer at some
18 point, I just see two different kind of perspectives.
19 Thank you.

20

21 CHAIRMAN CHRISTIANSON: Thank you. Any
22 other questions.

23

24 MR. PENDERGAST: Well, Mr. Chair.

25

26 CHAIRMAN CHRISTIANSON: Go ahead.

27

28 MR. PENDERGAST: Kevin with BLM. I was
29 going through the materials as well and maybe it'll
30 become more clear as more testimony is given but it
31 seemed to me that the ISC was looking forward toward a
32 potential future concern instead of looking backward at
33 existing data. Maybe that's a bit of the space we're
34 seeing, but that was my sense.

35

36 CHAIRMAN CHRISTIANSON: Any other
37 questions for Staff on their presentation.

38

39

40 (No comments)

41

42 CHAIRMAN CHRISTIANSON: Hearing and
43 seeing none.....

44

45 MR. WOODS: Public Member Woods.

46

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

49

50

0603

1 MR. WOODS: The recommendations were
2 outlined. Population appear to be low in density due
3 to habitat limitations. The formation of a new hunt.
4 It looks like the recommendation is to close the fall
5 hunt, as one of the options, and then open up so it --
6 maybe it would have been better to go back to the RAC
7 and ask for a winter hunt just for Federal -- on the
8 Federal side besides this extended moose season. I'm
9 reading through the -- I'll finish so maybe public
10 testimony will bring that out along with ADF&G's
11 report. Thank you.

12
13 CHAIRMAN CHRISTIANSON: Thank you. Any
14 other questions from the Board for Staff.

15
16 (No comments)

17
18 CHAIRMAN CHRISTIANSON: Hearing and
19 seeing none, was there any written public comment
20 received.

21
22 MR. SANDERS: No comments were received
23 during the open public comment period.

24
25 CHAIRMAN CHRISTIANSON: Thank you.
26 Summary of tribal government, Alaska Native Corporation
27 consultation.

28
29 MR. LIND: Thank you, Mr. Chair. There
30 were no comments or questions.

31
32 CHAIRMAN CHRISTIANSON: Thank you.
33 Tribal Alaska Native organization testimony.

34
35 (No comments)

36
37 CHAIRMAN CHRISTIANSON: Hearing and
38 seeing none, Advisory group, SRC, State committee or
39 multiagency group.

40
41 MS. LAVINE: Mr. Chair, we received no
42 comments, thank you.

43
44 CHAIRMAN CHRISTIANSON: Thank you. Any
45 public testimony here or online please raise your hand.

46
47 (No comments)

48
49 CHAIRMAN CHRISTIANSON: Hearing and
50

0604

1 seeing none we'll move to Council recommendation on
2 this proposal.

3

4

MS. CAMINER: Thank you, Mr. Chair.
5 Southcentral Council supported establishing a late fall
6 season as proposed in the submitted proposal which
7 mirrors the season in Unit 15B and C. The Council
8 stated a late fall season provides additional
9 opportunity to harvest moose for subsistence users who
10 were not successful earlier in the season. The Council
11 acknowledged there are some conservation concerns for
12 the Unit 7 moose population and the lack of data but
13 successful harvesting of moose in that unit is really
14 very difficult. however, we felt that additional
15 harvest pressure and the few additional moose that
16 might be harvested during the late fall season is
17 manageable and would not add to the existing
18 conservation concerns or situations. We also agree
19 that moose seasons during the peak of rut, as
20 recommended at their fall 202 -- at our 2025 meeting
21 were not a good idea so we wanted to adjust those
22 dates.

23

24

Thank you very much.

25

26

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CHAIRMAN CHRISTIANSON: Thank you,
Judy. 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 the Alaska Department of Fish and Game
opposes the proposal. Similar to what you heard from
the Forest Service analysis, we agree that additional
harvest, given the information that we -- I mean to be
honest, don't know, will give us pause for conservation
measures. Knowing that and knowing that Member Pitka
always asks us about information, after reading through
our latest -- our management report, we are going to --
I mean we are trying. The situation is that your
traditional moose surveys are not the best use and so
we're looking at things that, you know, say, even 10
years ago weren't available to us and so I just want to
kind of highlight the things that we're looking at in
order to try to get an assessment in this region is
things like forward looking infrared radar and a

0605

1 genetic-based population survey and all of that is very
2 new technology, things that we didn't have in the past.
3 So we are trying new and innovative ways to try to get
4 a handle on populations but until this point it's been
5 challenging. We haven't done an assessment and even
6 when we did have the funding to conduct it, conditions
7 haven't been right, and so we do hold that as more of a
8 conservative population and so we get worried a little
9 easier than we do in other places.

10

11 The other thing I wanted to mention,
12 just for this body, not in particular to our position
13 on the proposal, is that, you know, this body is always
14 interested in every -- you know, our efforts, on the
15 Federal side, just in general, educating hunters,
16 having hunters having additional education on what it
17 is to be responsible hunters, legal hunters and in Unit
18 7, this one and as well as 15, we require them to read
19 additional material and take a quiz and pass that quiz
20 in order to go hunting. It's one of those things that,
21 you know, given the -- where it's located
22 geographically in the state, we have a lot of folks
23 that like to utilize this area, we have a lot of people
24 around so we want to make sure that, you know, they are
25 getting that extra learning in order to hunt
26 responsibly and legally.

27

28 Thank you, Mr. Chair.

29

30 CHAIRMAN CHRISTIANSON: Thank you, Ben.

31 Questions.

32

33 (No comments)

34

35 CHAIRMAN CHRISTIANSON: Hearing and
36 seeing none, InterAgency Staff Committee.

37

38 MS. LAVINE: Thank you, Mr. Chair.
39 Good moose habitat has declined during recent decades
40 in parts of Unit 7 and throughout much of the Kenai
41 Peninsula because of a warming and drying climate.
42 This has resulted in an overall decline in the moose
43 population. Meanwhile hunting pressure has increased
44 from non-Federally-qualified users and that group
45 continues to harvest most moose in the unit. In
46 contrast the number of Federally-qualified subsistence
47 users has remained relatively small and stable. Since
48 2018 an average of 62 Federal permits have been issued
49 annually to Federally-qualified subsistence users and
50

0606

1 an average of 29 hunters have participated in the hunt
2 resulting in an annual harvest of zero to seven moose.
3 It is unlikely that either an extended season or an
4 addition of a late season after the rut would increase
5 harvest by Federally-qualified subsistence users
6 substantially. Current State data suggests there isn't
7 a conservation concern, however, if conservation
8 concerns arise delegating authority to the Seward
9 District Ranger to close the Federal hunt would enable
10 a rapid and timely response.

11

12 Thank you, Mr. Chair.

13

14 CHAIRMAN CHRISTIANSON: Thank you,
15 Robbin. Board discussion with the Liaison, Council
16 Chair, State rep, this is your opportunity to get
17 clarification, ask a question.

18

19 Rhonda.

20

21 MS. PITKA: I'd like to thank the State
22 for taking that information that I ask and the
23 questions that I ask seriously and providing that
24 information in the analysis, it's really helpful for
25 decisionmaking and in managing moose populations.

26

27 Thank you.

28

29 CHAIRMAN CHRISTIANSON: If there's no
30 discussion we'll open up the floor for Board action.

31

32 MR. INGERSOLL: Mr. Chair, from the
33 Forest Service. Forest Service moves to adopt Proposal
34 26-17. If I get a second I'll explain why I intend to
35 support my motion.

36

37 MS. BOARIO: Fish and Wildlife Service
38 seconds.

39

40 MR. INGERSOLL: Mr. Chair. This is a
41 complex one. There is a conservation concern and we
42 acknowledge and appreciate the partnership with the
43 State of Alaska in assessing the population and
44 managing for a sustainable population there. Habitat
45 is in decline and that seems to be driving factor and
46 Federally-qualified subsistence users take only less
47 than 20 percent of the total moose harvested and even
48 more are taken by collisions with vehicles and trains.
49 So there is a conservation concern but the Federally-
50

0607

1 qualified use is small and a subsistence priority for
2 rural users is important and matters here. If a
3 conservation concern increases the Seward District
4 Ranger has the authority to restrict harvest as an in-
5 season manager. And so, therefore, for these reasons
6 and in deference to the Southcentral Advisory Council,
7 Forest Service supports.

8

9 CHAIRMAN CHRISTIANSON: Any further
10 deliberation, discussion.

11

12 (No comments)

13

14 CHAIRMAN CHRISTIANSON: Read it into
15 the record and roll call, please.

16

17 MS. LEONETTI: The motion is to adopt
18 Wildlife Proposal 26-17.

19

20 Forest Service Member Ingersoll.

21

22 MR. INGERSOLL: Support.

23

24 MS. LEONETTI: Public Member Pitka.

25

26 MS. PITKA: I support for the reasons
27 articulated already and in deference to the Regional
28 Advisory Council.

29

30 MS. LEONETTI: BIA Member John.

31

32 MS. JOHN: BIA votes to adopt WP26-17
33 in support of the motion made by the Forest Service.
34 This gives deference to the Southcentral Alaska RAC and
35 we concur with their justification. Avoiding harvest
36 during the rut and extending the hunt to early November
37 should not create conservation issues as indicated by
38 the Council.

39

40 MS. LEONETTI: Public Member Woods.

41

42 MR. WOODS: Public Member Woods adopts
43 the recommendations by the RAC in coordination with the
44 State and to provide subsistence opportunity for -- our
45 charge is under that regulation helps subsistence
46 opportunity for Federally-qualified subsistence users.

47

48 Thank you.

49

50

0608

1 MS. LEONETTI: BLM Member Pendergast.

2

3 MR. PENDERGAST: BLM supports WP26-17.

4 I want to provide just a little bit of additional
5 rationale from our perspective since we're talking
6 about moose on the road system, right in our backyard
7 from where we're sitting here.

8

9 Acknowledge there are concerns about
10 moose population but from what I'm tracking and what
11 the ISC analyzed I'm not hearing that there's a
12 conservation concern at this time. And given the
13 number of users we're talking about that and the
14 difficulty of this terrain and the success they've had
15 to date I'm not convinced that if we open this up it's
16 going to create, you know, or lead quickly to a
17 conservation concern. Federally-qualified subsistence
18 users have harvested a relatively low number of moose
19 on average and the additional late fall season is not
20 expected to significantly increase that harvest but
21 adopting this will provide a meaningful preference to
22 Federally-qualified subsistence users. So our support
23 is based on that rationale and in deference to the RAC.

24

25 MS. LEONETTI: Fish and Wildlife
26 Service Member Boario.

27

28 MS. BOARIO: Fish and Wildlife Service
29 supports for the reasons outlined by the Forest Service
30 and the speakers that followed and in deference to the
31 RAC. Thank you.

32

33 MS. LEONETTI: Public Member Oney.

34

35 MR. ONEY: Public Member Ray Oney moves
36 to support WP26-17 in deference to Southcentral RAC and
37 comments by Forest Service.

38

39 MS. LEONETTI: Public Member Payenna.

40

41 MR. PAYENNA: Public Member Payenna
42 votes to support WP26-17 in deference to the RAC and in
43 agreement with comments submitted by BLM and Forest
44 Service. Thank you.

45

46 MS. LEONETTI: Park Service Member
47 Striker.

48

49 MR. STRIKER: Park Service supports in

50

0609

1 deference to the RAC for the reasons articulated by
2 Jerry.

3

4 MS. LEONETTI: Chair Christianson.

5

6 CHAIRMAN CHRISTIANSON: I support.

7

8 MS. LEONETTI: Mr. Chair, the motion
9 carries unanimously.

10

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I'm also just stating this on the record because it's been proven this week that the Chairman doesn't like to eat lunch.

(Laughter)

CHAIRMAN CHRISTIANSON: You've seen my stomach, it needs a day off.

(Laughter)

CHAIRMAN CHRISTIANSON: You've got the floor Brian.

MR. UBELAKER: Thank you, Mr. Chair. I will be presenting -- oh, sorry. For the record, Brian Ubelaker and I will be presenting a summary of Wildlife Proposal WP26-22 which was removed off of the consensus agenda and can be found on Page 73 of said meeting materials.

Proposal WP26-22 is one of five proposals submitted by the Cooper Landing Safe Trails Committee which requests trapping setbacks from designated roads, trails, beaches and campgrounds in the Cooper Landing area. WP26-22 specifically requests establishing setback distances of 100 yards from

0610

1 designated pullouts and roads. These setbacks would
2 not apply to traps that are elevated at least three
3 feet above hard ground, placed under water or ice or
4 otherwise enclosed. The remaining four proposals
5 submitted by the Committee are on the consensus agenda.

6
7 The proponent states these measures
8 would make Cooper Landing safer for families and pets
9 benefiting the local recreation based economy. They
10 cite support from community surveys, search and rescue
11 groups and provide examples from other Alaskan
12 communities where similar setbacks have been adopted.

13
14 The proponent also submitted five
15 similar trapping setback proposals to the Alaska Board
16 of Game for their 2025/26 meeting cycle. Of those the
17 Board of Game adopted Proposal 145 in their March 2026
18 meeting with modification, reducing the setback
19 requirement to 50 yards. Board of Game Proposal 145
20 most closely mirrors Federal Proposal WP26-22 in that
21 it also requested 100 yard setbacks from designated
22 roads and pullouts.

23
24 To maintain consistency for all user
25 groups OSM supports aligning Federal regulations with
26 the State's recent adoption of Board of Game Proposal
27 145. However, Proposal 145 included roads and pullouts
28 not covered in WP26-22 and the codified regulation
29 resulting from its adoption has not yet been published
30 in the Alaska Administrative Code, therefore, OSM
31 recommends either opposing WP26-22 or deferring action
32 until the State's codified regulation becomes
33 available.

34
35 Thank you, with that, I will try to
36 answer any questions.

37
38 MR. PENDERGAST: I have a question.

39
40 MS. PITKA: Please, go ahead, BLM.

41
42 MR. PENDERGAST: Kevin Pendergast, BLM.
43 I am hopelessly confused and at this point I'm hoping
44 you can help out. Which proposal aligns with current
45 -- well, with recently passed State regulations which
46 will eventually become part of the AAC?

47
48 MR. UBELAKER: Through the Chair.
49 Member Pendergast. Wildlife Proposal WP26-22 aligns
50

0611

1 with three of the requested areas that were adopted by
2 Proposal 145.

3

4 MR. PENDERGAST: 145. South Quartz
5 Creek Road, Forest Service Sectional joining highway
6 and all pullouts on Federal land, et cetera, et cetera?

7

8 MR. UBELAKER: No. All pullouts on the
9 Sterling Highway doesn't 100 percent match what was
10 adopted in Proposal 145. Proposal 145 asked for all
11 Sterling Highway pullouts from Tern Lake to Russian
12 River Ferry and the boat launch, where Proposal -- the
13 Federal Proposal 26-22 asks for Sterling Highway
14 pullouts from Tern Lake to Cooper Landing. So there's
15 a section of, I think, like 12-ish miles on the other
16 side of Cooper Landing that are not asked for in the
17 Federal proposal that will be adopted under the State
18 side.

19

20 MR. PENDERGAST: Feel free to punt this
21 as more people like the State get on the ability to
22 speak here, but my struggle right now, my question is
23 like we're talking about Southcentral road accessible
24 areas where people can set traps, I'm very concerned
25 about creating confusion between State and Federal regs
26 so I'm -- I think I'm looking for how I can support
27 aligning those, I'm just not -- it's just not clear to
28 me what that is.

29

30 MR. UBELAKER: It's our opinion that
31 once the State has codified regulations in AAC then if --
32 if 26-22 is deferred it can be modified to 100 percent
33 match what the State has in their regulation, if not a
34 new proposal could be submitted to match what's in the
35 codified regulation.

36

37 MR. PENDERGAST: Stating it another way
38 then, is it fair to say that there's nothing before us
39 today that an up or down vote would achieve perfect
40 alignment with State regulation?

41

42 MR. UBELAKER: My opinion, OSM opinion,
43 no. There is -- there are too many mismatches. Some
44 of the language adopted in the State Proposal 145 is
45 also covered in Federal Proposal 26-23. There -- I
46 think there are too many variables if we try to match
47 anything before the State has language solidified that
48 we can 100 percent word for word match.

49

50

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1 MR. PENDERGAST: Okay. So if I were
2 motivated towards eventual match, one possibility could
3 be to defer this for additional State AAC attached and
4 some additional work come back to get this in place.
5 If that were of interest to me that might be a
6 potential path?

7
8 MR. UBELAKER: Correct.

9
10 MR. PENDERGAST: Thank you.

11
12 CHAIRMAN CHRISTIANSON: Any other
13 questions.

14
15 (No comments)

16
17 CHAIRMAN CHRISTIANSON: Thank you. Any
18 written comment received.

19
20 MR. UBELAKER: Oh boy were there ever.

21
22 (Laughter)

23
24 MR. UBELAKER: Yes, Mr. Chair. There
25 were 10 written public comments submitted in support
26 with the common topics of the comments being these
27 proposals protect families, pets and recreational users
28 while still allowing responsible trapping. Traps in
29 multi-use areas create real safety risks and current
30 regulations are difficult to enforce. Most trappers
31 follow ethical guidelines but some do not and setbacks
32 provide clear rules to prevent conflicts. With
33 overwhelming community support and successful examples
34 elsewhere in Alaska these common sense measures balance
35 public safety, recreation and traditional subsistence
36 practices.

37
38 There were also five comments submitted
39 in opposition with the common topics of the comments
40 being these proposals are overly restrictive,
41 unnecessary and would burden subsistence trappers under
42 ANILCA. Many commentators stating they have never had
43 any incident with traps and informal communication with
44 local trappers has always ensured safety. Trapping has
45 been part of Alaska's heritage and these regulations
46 would remove large areas from traditional use while
47 creating confusion about land boundaries. Education,
48 responsible dog handling and community communication
49 are far better solutions than restricting trapping.
50

0613

1 Thank you.

2

3 CHAIRMAN CHRISTIANSON: Thank you.
4 Summary of tribal government, Alaska Native Corporation
5 consultation.

6

7 MR. LIND: Thank you, Mr. Chair. Board
8 members. There were no questions or comments on these
9 proposals.

10

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

13

14 (No comments)

15

16 CHAIRMAN CHRISTIANSON: Hearing or
17 seeing none, Advisory Group, SRC, State Advisory or
18 multiagency.

19

20 MS. LAVINE: Thank you, Mr. Chair.
21 There were no comments submitted for this proposal.

22

23 CHAIRMAN CHRISTIANSON: Thank you,
24 Robbin. Any public testimony here or online show of
25 hands.

26

27 MS. LAVINE: Mr. Chair. First in the
28 que is Sandy Vanbrunt. Please unmute yourself and
29 address the Board.

30

31 (Pause)

32

33 MS. LAVINE: Go ahead.

34

35 (Pause)

36

37 MS. LAVINE: Sandy, if you -- your mic
38 appears unmuted but we cannot hear you. Maybe there's
39 also a mute function on your computer.

40

41 (Pause)

42

43 MS. LAVINE: And we still can't hear
44 you. Sandy, while we wait for you to try again the
45 next person in the que is Chris Perry.

46

47 MR. PERRY: Can you hear me?

48

49 CHAIRMAN CHRISTIANSON: Yes, you have

50

0614

1 the floor.

2

3

MR. PERRY: Yeah, good morning and
4 thanks for this opportunity to speak on this WP26-22.
5 My name is Chris Perry, I've been a resident of Homer
6 for 43 years and have done winter recreation in Cooper
7 Landing for most of this time. I'd like to comment on
8 support of WP26-22.

9

10 This proposal setback are not anti-
11 trapping proposals and any consideration that they are
12 in any way is not -- does an injustice to any and all
13 comments concerning this proposal. These are not
14 allocative issues and should not be considered only --
15 they should be considered only as public safety and
16 cooperation between user groups. There are some
17 restrictions in the state considering closed trapping
18 areas and setbacks, these are mostly in municipalities.
19 ADF&G code of ethics is mostly non-regulatory
20 recommendations that suggest and recommends avoiding
21 multi-use areas to avoid conflict, posting signage back
22 to trapping areas. There are no restrictions for
23 placing traps on or in close proximity to these
24 pullouts, rest areas or on these roads. These highway
25 pullouts and rest areas are a very small portion of the
26 actual highway miles in the area being considered. The
27 new Sterling Highway bypass will provide many more
28 miles of remote access. There are many miles of
29 highway shoulder that a trapper can safely pull off to
30 set traps in close proximity to the highway with little
31 chance of user conflict. ADF&G Trappers Association
32 and some individual trappers and most importantly the
33 trapper code of ethics support, encourage and direct
34 trappers to avoid these areas where there may be
35 conflict between user groups. This is all good and
36 many trappers adhere closely to these guidelines. Most
37 trappers will not use signage as they say it draws
38 attention to their trapline and exposes them to
39 vandalism. The problem is that most trail users have
40 no idea identifying active trapping areas, and many
41 non-trappers can't believe that trapping is allowed on
42 and in close proximity to public maintained, publicly
43 used and often dedicated easement trails. There have
44 been 11 dogs trapped within two miles of my house in
45 the last eight years. Most of these dogs are trapped
46 within 20 feet of a road easement with no signage of
47 active trapping. Five of these dogs were trapped by
48 the same trapper who considers himself an ethical
49 trapper who will not post signage and checks his traps
50

0615

1 only weekly. Two dogs were trapped at the same trap
2 set location. One dog spent four days in a trap,
3 melting four feet deep in the snow -- four foot deep
4 hole in the snow before being released 100 yards from
5 their owners property. There are no leash laws in any
6 of these areas. Dog owners are supposed to control
7 their animals. The leashes I use are 24 foot
8 retractable and allow the dog to be more than three to
9 six feet from the owner. As traps can be set in close
10 proximity or on a trail this will not prevent trapping
11 conflict. The Sterling Highway through Cooper Landing
12 is one of the most highly used roads in the state. I'm
13 horrified to consider an unsuspecting traveler stopping
14 at a pullout or rest area to exercise themselves and
15 their dog to be confronted with their dog dying in a
16 conibear trap. It's very difficult to release a dog,
17 and no signage or indication of legal trails in the
18 area. At this time it's completely legal to place a
19 trap in the middle of a dedicated easement without any
20 notification.

21

22 Thank you so much for your time. I
23 hope you can consider this for passage now, this is an
24 important issue that needs to be dealt with.

25

26 Thank you so much for your time.

27

28 CHAIRMAN CHRISTIANSON: Thank you for
29 taking the time to call in and testify. Any questions
30 for the public testifier.

31

32 (No comments)

33

34 CHAIRMAN CHRISTIANSON: Thank you.

35

36 MR. PERRY: Thank you again.

37

38 MS. LAVINE: Thank you, Mr. Chair.
39 Next in the que is Sandy Vanbrunt. Sandy, can you
40 unmute your phone, you can -- or unmute your -- oh, I
41 see.

42

43 MS. VANBRUNT: I am -- can you hear me
44 now?

45

46 MS. LAVINE: Yes, we can.

47

48 MS. VANBRUNT: Okay.

49

50

0616

1 MS. LAVINE: Oh, Sandy, we need you to
2 call back in so we will wait -- oh, are you on your
3 computer, can you speak. Sandy, we can't hear you
4 through your computer so please call in and we'll give
5 you a minute.

6
7 (Pause)

8
9 MS. LAVINE: So, Sandy, please try
10 calling in one more time. We heard you briefly when
11 you called in with your phone and you will need to mute
12 your -- okay, great, you can speak into your phone.
13 You have the floor.

14
15 MS. VANBRUNT: Okay. Thank you. Good
16 afternoon -- or good morning. My name is Sandy
17 Vanbrunt and I'm presenting testimony on behalf of
18 Lorraine Temple, President of the Cooper Landing Safe
19 Trails. I'm going to move away from my computer so you
20 don't get that reverberation from two different --
21 unfortunately Lorraine is unable to be here today so
22 I'm going to read her testimony.

23
24 My name is Lorraine Temple and I'm
25 President of the Cooper Landing Safe Trails. I am a 42
26 year resident of the Kenai Peninsula and 22 of those in
27 the Cooper Landing area. I am submitting testimony on
28 Proposal WP26-22, which would regulate trap setbacks
29 for certain roads and highway pullouts in the Cooper
30 Landing area. Cooper Landing residents utilize public
31 lands for many uses with recreation as its highest use.
32 This area has also become a destination for visiting
33 recreationalists and that number is growing. As with
34 any area where there is multiple use there has been
35 some conflict, this is why Cooper Landing Safe Trails
36 was founded. Our goal is to help resolve user
37 conflicts in a manner that acknowledges and respects
38 these various uses. We are here today to ask for your
39 support on WP26-22 which would require the 100 yard
40 setback for trapping snares from certain roads and
41 pullouts in the Cooper Landing area, with exception for
42 non-lethal traps set three feet above ground or snow
43 level enclosed underwater or under ice. We ask for
44 this support of this proposal with an amendment to
45 change the 100 yards to the 50 yards. In March the
46 Alaska Department of Fish and Game, Board of Game
47 passed a proposal, No. 145, which has the same language
48 as 26-22 with an amendment for the 50 yard setback.
49 This is why we are asking for the 50 yard amendment for
50

0617

1 26-22. Passage of WP26-22 would then align with the
2 new State of Alaska regulations and would be far less
3 complicated for the users. Further implementation of
4 this proposal will also align with U.S. Forest Service
5 core values, one of which is to manage for safety in
6 every way, physical, psychological and social. While
7 we have additional reasoning for this proposal overall
8 the core of our request is to help the public by having
9 consistency across the different land management
10 agencies. On behalf of Cooper Landing Safe Trails,
11 thank you for your consideration of WP26-22 with
12 amendment.

13
14 CHAIRMAN CHRISTIANSON: Thank you.
15 Thank you for your time to call in and testify today,
16 any questions.

17
18 (No comments)

19
20 CHAIRMAN CHRISTIANSON: Hearing and
21 seeing none, appreciate it. Any more Robbin.

22
23 MS. LAVINE: (Shakes head negatively)

24
25 CHAIRMAN CHRISTIANSON: That concludes
26 our public testimony. Council recommendation.

27
28 MS. CAMINER: Thank you, Mr. Chair.
29 Looking back at our notes, it was quite a thorough
30 discussion because we had many, many comments, written
31 and verbal, on both sides.

32
33 We specifically took action on 19, so
34 in some ways I can't help you too much on this one,
35 however, I do have it in my notes and we had heard from
36 Fish and Game that the Board of Game was going to be
37 taking up those proposals, similar proposals. I think
38 we wanted to wait to see how that turned out and then
39 ask the Board to perhaps do something similar, but in
40 general we did say that we opposed unnecessary
41 restrictions on subsistence users. We do have sympathy
42 for dogs getting injured, of course, but I think we
43 just want to look a little bit more at consistency
44 between the regulations.

45
46 Thank you.

47
48 CHAIRMAN CHRISTIANSON: Thank you,
49 Judy. Alaska Department of Fish and Game.

50

0618

1 MR. MULLIGAN: Thank you, Mr. Chair.
2 For the record the Alaska Department of Fish and Game,
3 we -- I don't know if that's quite right. So in
4 conversations we had once the Board met, OSM reached
5 out and asked about this proposal going on to the non-
6 consensus agenda, in my response I said, given the
7 action that was just taken and you taking up similar
8 actions here it would be appropriate to have a
9 conversation so the Board knew what had been done in
10 our March meeting. As far as how that goes, it was
11 going to be up to you because as OSM has already
12 acknowledged, it's different. 22 has beaches in it,
13 145 only had roads and pulloffs, so there's definitely
14 some differences and also the Board of Game modified it
15 for the 50 yard instead of the 100.

16
17 Knowing there's all these little things
18 at play and in order to get it right, you know, I guess
19 here's the thing, is as I know Member Pendergast has
20 said, he prefers to vote it up or down and, or if you
21 guys want to defer, either way it's going to happen in
22 two years because in order to support anything we like
23 to see the regulatory -- our own regulatory language
24 and then see what comes forward to the Board just so
25 it's clear because as you guys are well familiar, if
26 you guys do alignments we tend to support those but in
27 order to do that and with, I would say 100 percent
28 confidence, knowing that it is exactly what our Board
29 passed, it's probably a good idea not to take action on
30 this one until at such time we have that certainty.

31
32 CHAIRMAN CHRISTIANSON: Thank you, Ben.

33
34 MS. LEONETTI: Forest Service.

35
36 CHAIRMAN CHRISTIANSON: Forest Service.

37
38 MR. INGERSOLL: Yeah, if we were to
39 defer action on this proposal, how long would we need
40 to go in order to understand exactly the regulatory
41 language passed by the Board of Game?

42
43 MR. MULLIGAN: So -- oh, through the
44 Chair, Member Ingersoll. We like to have our
45 regulations promulgated by June 30th because that's the
46 new regulatory cycle and that's -- but as soon as I get
47 a final copy that we're comfortable with I can share it
48 but we will know for sure once we get those approved by
49 the Lt. Governor's office, which given print schedule,
50

0619

1 I'm thinking it's going to be by the beginning of the
2 June, so you might not need to defer it that long but
3 that's up to you guys but that's our timeframe.

4

5 MR. INGERSOLL: Thank you.

6

7 CHAIRMAN CHRISTIANSON: Thank you,
8 State. InterAgency Staff Committee.

9

10 MS. LAVINE: Mr. Chair. The
11 InterAgency Staff Committee provided the standard
12 comment. Thank you.

13

14 CHAIRMAN CHRISTIANSON: Board
15 discussion. Any more questions.

16

17 MS. CAMINER: Mr. Chair.

18

19 MR. WOODS: So, Mr. Chair, and the
20 Council and OSM, State and the RAC, adoption of
21 Proposal WP26-19 would allow conservation safety
22 concern, but I have a question on adopting proposals of
23 secondary recommendation from OSM and it's addressed in
24 different parts of this analysis, is, do away with all
25 the other proposals and that would include 18 through
26 22 and 23 would result in Federal regulations being
27 more restrictive and those questions for me are hanging
28 in the air on -- I like the recommendation of deferring
29 for a short period to catch up. It's almost like a --
30 if anybody's been involved in the State process with
31 RS2477, that's exactly what we're faced with right
32 here, that there's different restrictions, different
33 requirements and I'm reluctant to pass but I'd like to
34 see defer if that makes passage and -- it's so
35 complicated without a map, so complicated without the
36 easements, it's a very needed clarification in not only
37 State and Federal regulations but for user groups to
38 make it a more, not only safe, but enjoyable experience
39 to work and operate off our trails, but also we're
40 going to provide subsistence opportunity in the
41 trapping world.

42

43 So, thank you.

44

45 CHAIRMAN CHRISTIANSON: Judy.

46

47 MS. CAMINER: Thank you, Mr. Chair.
48 Well, I'm just wondering, if the Council or the Board
49 could take these proposals up once we have the
50

0620

1 information from the Board of Game, could it be
2 considered somewhat out of cycle, either with the fall
3 RAC meetings or perhaps a special action by the Board
4 rather than waiting a couple years for the next
5 wildlife cycle. You probably don't have to answer that
6 for me now but just something to think about.

7

8 MR. PENDERGAST: Well, I -- Mr. Chair,
9 Kevin Pendergast, BLM. You know I was giving some
10 thought to timelines and we do have a fisheries meeting
11 coming up in a little over a year and that might be
12 kind of a middle road providing ample time to get
13 things aligned and so forth so that's something I've
14 been thinking over here.

15

16 MR. INGERSOLL: Mr. Chair. I think in
17 reference to Frank's comment, several of these actions
18 remain on the consensus agenda. So the WP26-19 with
19 modification is on the consensus agenda for support and
20 then 18, 20, 21 and 23 are on the consensus agenda to
21 take no action so I believe if we take -- if we were to
22 take 22 and defer it for a future action we could -- if
23 it's the will of the Board, align with the recent
24 action from the Board of Game.

25

26 CHAIRMAN CHRISTIANSON: Maybe we just
27 -- at this time, I'm hearing pretty much concurrence by
28 the Board that we can entertain a motion to defer at
29 this time.

30

31 MR. PENDERGAST: Mr. Chair.

32

33 CHAIRMAN CHRISTIANSON: You have the
34 floor.

35

36 MR. PENDERGAST: BLM moves that we
37 defer this wildlife proposal, 22, until the 2027
38 fisheries meeting. The intent being hopefully to give
39 the RAC time to work this at a little bit finer detail,
40 the State regulation will presumably have time to
41 attach and it just -- I appreciate the testimony, I
42 appreciate that the public safety concerns that exist,
43 I think in a certain sense those probably have existed
44 for awhile and may be on the uptick but I'm not hearing
45 that one year is going to tip the scale one way or the
46 other, but from the matter of good policy when I've got
47 five different proposals before me and a pending State
48 regulations, you know, there's just so many unknowns,
49 it just seems a little irresponsible to kind of just --
50

0621

1 even though I like the up or down votes, you know, to
2 go there right now. So I'm moving that we go ahead and
3 defer.

4

5 MR. INGERSOLL: I will second BLM's
6 motion having to do mainly with the National Forest
7 system land.

8

9 (Laughter)

10

11 MR. PENDERGAST: Oops, sorry, yep, for
12 stealing the motion.

13

14 (Laughter)

15

16 CHAIRMAN CHRISTIANSON: We all got each
17 other's back.

18

19 (Laughter)

20

21 CHAIRMAN CHRISTIANSON: Motion's been
22 made to defer, any other deliberation or discussion.

23

24 (No comments)

25

26 CHAIRMAN CHRISTIANSON: Any opposition
27 to defer this motion.

28

29 (No opposing votes)

30

31 CHAIRMAN CHRISTIANSON: Hearing and
32 seeing none, motion carries unanimous. 26-24.

33

34 MS. HOLMAN: Again, hello, Mr. Chair.
35 Members of the Board. Kendra Holman for the record,
36 Wildlife Biologist with OSM. This will be a summary of
37 the analysis for Proposal WP24-2 -- 26-24 that can be
38 found starting on Page 813 of your meeting book. This
39 proposal was submitted by the Eastern Interior Regional
40 Advisory Council requesting to increase the brown bear
41 harvest limit to two bears in Unit 11.

42

43 The proponent states that this proposal
44 would provide additional opportunity for Federally-
45 qualified subsistence users and there are no
46 conservation concerns for brown bears in the unit.

47

48 As far as regulatory history goes there
49 was no Federal hunting for brown bears in Unit 11 prior
50

1 to 1999 and the last change was around 2016 when the
2 Board allowed for hunting for brown bears over bait
3 following the Board of Game adopting a similar proposal
4 in 2015. Management objectives for brown bears in Unit
5 11 is to provide the greatest sustained opportunity to
6 participate in hunting them. Brown bears are
7 considered abundant in Unit 11, frequent sightings of
8 females with cubs suggest good productivity. Based on
9 incidental observations and harvest locations brown
10 bears habitat -- brown bears inhabit -- in -- I'm
11 getting tongue-tied here -- inhabit most of Unit 11
12 except the high elevation glaciers. In 2019 the
13 National Park Service conducted an aerial survey for
14 brown bears that covered much of Unit 11 preliminary
15 results suggested that brown bear densities within Unit
16 11 are consistent with recent density estimates in
17 nearby units. Given the low yearly harvest, access
18 limitations and the large amount of habitat that serves
19 as refugia due to a restricted eligibility for users
20 for the National Park Service regulations hunting
21 likely has no influence on brown bear numbers,
22 composition, or productivity trends in the unit.

23
24 No permits or harvest tickets are
25 required to hunt brown bears in Unit 11 under State or
26 Federal regulations. Although all harvested brown
27 bears are required to be sealed within 30 days of the
28 kill providing harvest information. Bait may be used
29 to hunt brown bears under both State and Federal
30 regulations. Local residents defined as hunters living
31 in Units 11 or 13 harvested an average of one to five
32 bears annually from 2010 to 2013. Over the same
33 timeframe they averaged 2.6 bears per year or 25
34 percent of the total report harvest. Info on this can
35 be found on Table 1 on Page 819 of your meeting book.
36 While an annual harvest composed of at least 50 percent
37 males is not a management objective for Unit 11, this
38 metrics is monitored in Unit 11. From 2014 to 2018 the
39 percent of females in the reported harvest averaged 34.
40 This can be found, again, on Table -- in Table 1 on
41 Page 819. Brown morta -- brown bear mortality
42 occurring as DLP in Unit 11 are typically -- typically
43 ranges from zero to one bear in a five year reporting
44 period. Unreported human caused mortality of brown
45 bears in Unit 11 is likely minimal given the relatively
46 low levels of harvest pressure.

47
48 If this proposal were to be adopted,
49 the brown bear harvest limit in Unit 11 would increase
50

0623

1 from one to two bears increasing subsistence
2 opportunity. This proposal would increase regulatory
3 complexity by misaligning State and Federal limits for
4 brown bears in Unit 11. However, a proposal could be
5 submitted to the State for their 2027/2028 Board of
6 Game cycle which considers this region. A prohibition
7 on the take of cubs and sows with -- of cubs -- and
8 sows with cubs under both State and Federal regulations
9 helps to protect the reproductive component of the
10 population and permit -- and promote recruitment.

11

12 Additionally, most of the brown bear
13 harvest is by non-Federally-qualified users.
14 Federally-qualified subsistence users have historically
15 only harvested a few brown bears in Unit 11 and most --
16 and must salvage both the meat and the hide. Harvest
17 is not expected to increase substantially from this
18 additional limit increase. This proposal increases
19 subsistence opportunity and there are no conservation
20 concerns due to the low harvest pressure of brown bears
21 and brown bear populations that are considered abundant
22 and healthy.

23

24 The OSM conclusion is to support this
25 proposal. Thank you, Mr. Chair. Members of the Board.
26 Happy to address any questions.

27

28 CHAIRMAN CHRISTIANSON: Thank you.
29 Thank you for that presentation. Any questions from
30 the Board for Staff.

31

32 (No comments)

33

34 CHAIRMAN CHRISTIANSON: Appreciate it.
35 Summary of written public comment.

36

37 MS. HOLMAN: So, Mr. Chair, there was
38 one written public comment received from the Ahtna
39 InterTribal Resource Commission supporting this
40 proposal. This proposal would change -- this proposed
41 change would provide greater flexibility and
42 opportunity for Federally-qualified subsistence users.
43 Brown bears are an important part of the Ahtna cultural
44 traditions -- is a short part of what their comment
45 included. I'll let them add additional detail to that
46 if they would like when they come up.

47

48 CHAIRMAN CHRISTIANSON: Thank you.
49 Summary of tribal, ANCSA Corporation.

50

0624

1 MR. LIND: Thank you, Mr. Chair.
2 During the August consultation sessions we had a
3 representative from Ahtna who were in support of that
4 proposal. Thank you, Mr. Chair.

5
6 CHAIRMAN CHRISTIANSON: Thank you,
7 Orville. Tribal Alaska Native organization testimony.

8
9 MS. LAVINE: Mr. Chair. Karen Linnell
10 -- oh, actually she did not put her name down for 24 --
11 actually -- sorry -- sorry, not for 24 so -- and I do
12 not see anyone with their hands raised online.

13
14 MS. LINNELL: Are you calling me or
15 not?

16
17 MS. LAVINE: Nope.

18
19 (Laughter)

20
21 MS. LAVINE: Nope.

22
23 MS. LINNELL: Okay.

24
25 (Laughter)

26
27 CHAIRMAN CHRISTIANSON: Get your steps
28 in Auntie.

29
30 (Laughter)

31
32 CHAIRMAN CHRISTIANSON: Advisory group
33 testimony, SRC, State Advisory, multi-agency.

34
35 MS. LAVINE: Mr. Chair, we do have
36 comments from the Wrangell-St. Elias Advisory Group.
37 Just one moment.

38
39 For Wildlife Proposals 26-24, 25, 26
40 and 71 increase the harvest limit of brown bears in
41 Units 11, 12 and 13. The Wrangell-St. Elias National
42 Park Subsistence Resource Commission unanimously
43 supported a group of proposals increasing the harvest
44 limit of brown bear in Units 11, 12 and 13 with a
45 modification requesting that monitoring continues of
46 brown bear populations. Many observations have shown
47 that brown bear have been doing well in these units but
48 it is important to prevent overharvest. Increasing the
49 harvest limit will allow for more harvest opportunities
50

0625

1 for local subsistence users.

2

3

Thank you, Mr. Chair.

4

5

6

CHAIRMAN CHRISTIANSON: Thank you, Robbin. Any public testimony here or online please raise your hand.

7

8

9

(No comments)

10

11

CHAIRMAN CHRISTIANSON: RAC Chair.

12

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36

37

Thank you.

38

39

40

CHAIRMAN CHRISTIANSON: Thank you, Judy. Eastern Interior.

41

42

43

44

45

46

47

48

49

50

MS. MCDAVID: Thank you, Mr. Chair. Brooke McJesus, Eastern Interior Council Coordinator. The Eastern Interior Council voted to take no action and defer to the home Council but they did want to submit a comment just for consideration to the Board.

EIRAC actually did submit this proposal, they have C&T for this area for and folks who

0626

1 live in Unit 12 have C&T for this part of the
2 Southcentral region. Their intent was to increase
3 subsistence opportunity but they ultimately decided not
4 to take action on this proposal since it's outside of
5 their region and there were some constraints during
6 their meeting. Although they deferred to the home
7 region, they did just want to note that this proposal
8 would misalign State and Federal regulations so perhaps
9 consider -- maybe the Southcentral Council could
10 consider a Board of Game proposal in the future.
11 Additionally, the Council agrees with the comments that
12 were submitted by the Ahtna InterTribal Resource
13 Commission and the Wrangell-St. Elias SRC that if this
14 proposal is adopted there needs to be improved
15 monitoring of brown bear populations in Unit 11 in
16 coordination with AITRC and other local stakeholders.
17 Brown bear population information is severely lacking
18 and the Council expressed concerns about increasing the
19 harvest limit without a way to assess the impacts to
20 the population. They also noted the Federal
21 Subsistence Board cannot guarantee monitoring would
22 occur if this proposal is adopted.

23

24 So thank you for considering their
25 comments.

26

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

29

30 (No comments)

31

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

34

35 MR. MULLIGAN: Thank you, Mr. Chair.
36 For the record the Alaska Department of Fish and Game
37 opposes this proposal as it misaligns State and Federal
38 regulations. We did look back in to the records and we
39 haven't seen a similar proposal at the Board of Game
40 for at least the last few cycles. Thank you, Mr.
41 Chair.

42

43 CHAIRMAN CHRISTIANSON: Thank you, Ben.
44 InterAgency Staff Committee.

45

46 MS. LAVINE: Thank you, Mr. Chair. The
47 ISC provided the standard comment.

48

49 CHAIRMAN CHRISTIANSON: Thank you,

50

0627

1 Robbin. Board discussion with their Liaisons, Council
2 Chair and State rep.

3

4 (No comments)

5

6 CHAIRMAN CHRISTIANSON: Hearing and
7 seeing none we'll open up the floor for Board action.

8

9 MR. STRIKER: Mr. Chair. The National
10 Park Service moves to adopt WP26-24 and if I receive a
11 second I'll explain why I intend to vote in support of
12 my motion.

13

14 MS. BOARIO: Fish and Wildlife Service
15 supports.

16

17

18 MR. STRIKER: Thank you.

19

20 MS. BOARIO: Seconds.

21

22 (Laughter)

23

24 MR. STRIKER: The National Park Service
25 supports WP26-24 in deference to the Southcentral
26 Subsistence Regional Advisory Council. No impacts to
27 the Unit 11 brown bear are expected from this proposal.
28 Unit 11 is a very large remote area and currently
29 experiences very low harvest pressure for brown bear.
30 While no formal population assessments have occurred,
31 brown bear populations in Unit 11 are considered
32 generally abundant, healthy and well distributed across
33 the unit. Federally-qualified subsistence users have
34 historically only harvested a few brown bears from Unit
35 11 and must salvage both meat for human consumption and
36 the hide. Harvest is not expected to substantially
37 increase by -- to increase substantially by increasing
38 the subsistence harvest limit to two bears. It will
39 allow those that do hunt brown bear for food though to
40 harvest two if they wish to do so. The prohibition on
41 the take of cubs and sows with cubs under both State
42 and Federal regulations will remain and help to protect
43 the reproductive component of the population. Park
44 Service also agrees with Councils recommendation and
45 others recommendation that while there is no
46 conservation concern right now regarding brown bear
47 populations in the unit, we do desperately need
48 additional monitoring of the population to ensure
49 sustainable harvest. The proposal is further supported

50

0628

1 by Wrangell-St. Elias Subsistence Resource Commission.
2 Many local observations by that group have also shown
3 that brown bears are doing well and as you heard they
4 also encourage additional monitoring to prevent over
5 harvest. Increasing the harvest limit, bottom line,
6 will allow for more harvest opportunities for local
7 subsistence users.

8

9 Thank you.

10

11 CHAIRMAN CHRISTIANSON: Thank you, Don.
12 Questions, comments, deliberation.

13

14 (No comments)

15

16 CHAIRMAN CHRISTIANSON: Hearing none,
17 please read into the record and roll call.

18

19 MS. LEONETTI: The motion is to adopt
20 Wildlife Proposal 26-24. Forest Service Member -- oh,
21 Park Service Member Striker.

22

23 MR. STRIKER: Park Service supports.

24

25 MS. LEONETTI: Forest Service Member
26 Ingersoll.

27

28 MR. INGERSOLL: Forest Service supports
29 in deference to the RAC and to our colleagues in the
30 Park Service.

31

32 MS. LEONETTI: Public Member Pitka via
33 Mr. Woods.

34

35 MR. WOODS: Mr. Woods votes in favor of
36 the recommendations of the RAC and information, no
37 conservation concern, and provides opportunity and
38 thank you.

39

40 MS. LEONETTI: Mr. Woods, that was your
41 vote, correct?

42

43 MR. WOODS: Yes.

44

45 MS. LEONETTI: Would you like to vote
46 your proxy for Rhonda Pitka.

47

48 MR. WOODS: Voting for Ms. Pitka I also
49 would concur and approve for reasons stated. Thanks.

50

0629

1 MS. LEONETTI: Thank you.

2

3 Fish and Wildlife Service Member
4 Boario.

5

6 MS. BOARIO: Fish and Wildlife Service
7 votes in support for the reasons outlined by Park
8 Service Member Striker and in deference to the
9 Southcentral Subsistence Regional Advisory Council.

10

11 MS. LEONETTI: BIA Member John.

12

13 MS. JOHN: BIA votes to support the
14 National Park Service motion and in deference to the
15 Southcentral RAC. We concur with the Council's
16 justification plus we support the Ahtna InterTribal
17 Resources Commission on this proposed regulation which
18 would provide additional subsistence opportunities for
19 rural users in the area.

20

21 MS. LEONETTI: Public Member Oney.

22

23 MR. ONEY: Public Member Ray Oney moves
24 to support WP26-24 in deference to the RACs and
25 National Park Service.

26

27 MS. LEONETTI: Public Member Payenna.

28

29 MR. PAYENNA: In concurrence with
30 comments submitted by the Park Service and in deference
31 to the RAC I support WP26-24.

32

33 MS. LEONETTI: BLM Member Pendergast.

34

35 MR. PENDERGAST: BLM supports for
36 reasons stated by the Park Service.

37

38 MS. LEONETTI: Chair Christianson.

39

40 CHAIRMAN CHRISTIANSON: Support.

41

42 MS. LEONETTI: Mr. Chair, the motion
43 passes unanimously.

44

45 CHAIRMAN CHRISTIANSON: Thank you.
46 We're going to take a little break -- 1:00 o'clock.

47

48 MS. LAVINE: Mr. Chair.

49

50

0630

1 CHAIRMAN CHRISTIANSON: Yes.

2

3 MS. LAVINE: Can I just make an
4 announcement as we break for a shortened lunch, we have
5 50 minutes and so if you have not got your lunch
6 organized and you need time, OSM Staff is willing to do
7 a head count and order pizza locally. You'll just need
8 to support the order. Thank you, Mr. Chair.

9

10 CHAIRMAN CHRISTIANSON: Thank you.

11

12 MS. GREDIAGIN: Yeah, and, Gisela, do
13 you want to stand up and raise your hand, if you want
14 pizza talk to Gisela, thanks. Thank you, Gisela.

15

16 CHAIRMAN CHRISTIANSON: Thank you.
17 That sounds good. 1:00 o'clock, we'll just take a
18 short break. 1:00 o'clock.

19

20 (Off record)

21

22 (On record)

23

24 CHAIRMAN CHRISTIANSON: Could everybody
25 have a seat please we're going to get started.
26 Katya's going to give us a quick update on something
27 and then we're going to get back to where we were.

28

29 (Pause)

30

31 CHAIRMAN CHRISTIANSON: And before
32 Katya speaks, Mr. Reakoff is going to depart so he has
33 a few words.

34

35 MR. REAKOFF: Thank you, Mr. Chair. I
36 appreciate the State and Federal agencies and all the
37 public coming to speak to us, this Federal Subsistence
38 Board process is working extremely well. I'm
39 appreciative of all the work that the Board members do
40 but I need to go home now. I've had way too much fun,
41 I got to go back to work so I'll see you next time.

42

43 (Applause)

44

45 CHAIRMAN CHRISTIANSON: Safe travels
46 Jack.

47

48 Katya, you have the floor.

49

50

0631

1 MS. WESSELS: Thank you, Mr. Chair.
2 Members of the Board. I just wanted to share a piece
3 of good information. We received today, we received
4 the appointments for the Regional Advisory Councils,
5 that's 2025 appointments. The news release just went
6 out so we're very happy about that and I just wanted to
7 let you know because I'm sure you're not looking at
8 your emails to see the news release. And also the most
9 exciting thing is now we have -- on three Councils we
10 have young leaders appointed into non-voting seats
11 Southeast, Southcentral and YKDelta.

12
13 (Applause)

14
15 MS. WESSELS: So for everyone, please,
16 spread the word for the other Councils that next year
17 we'll be looking for the young leaders to get
18 appointed. This year the application period is closed
19 and we just had a couple of applications so next year
20 we'll be looking for more.

21
22 Thank you, that's all I have to report.

23
24 CHAIRMAN CHRISTIANSON: Thank you,
25 Katya. Thank you for the good news. Welcome aboard,
26 we have one of them here, Shania, stand up and do a
27 bow.

28
29 (Applause)

30
31 CHAIRMAN CHRISTIANSON: Welcome aboard.
32 You just asked if we had a seat for you earlier. Hey,
33 you got it, I just told them you got to watch what you
34 ask for, you end up with a job here.

35
36 (Laughter)

37
38 CHAIRMAN CHRISTIANSON: And it's not a
39 9:00 to a 5:00 job either. Back to where we were in
40 the process. Yes, Robbin.

41
42 MS. LAVINE: So, Mr. Chair, I think we
43 were about to proceed beyond public testimony and start
44 with a motion but I do believe we have someone from the
45 public, or two people from the public who wish to speak
46 to Wildlife Proposal 26-31. In fact, actually quite a
47 few folks. So to start we have Mark Richards, Mark,
48 please address the Board.

49
50

0632

1 MR. RICHARDS: Thank you. Can you hear
2 me Tony?

3
4 CHAIRMAN CHRISTIANSON: Yes, you have
5 the floor Mark.

6
7 MR. RICHARDS: Okay. Good afternoon,
8 Mr. Chairman. Members of the Board and Federal agency,
9 Staff. For the record my name is Mark Richards, I'm
10 representing Resident Hunters of Alaska. We're a
11 hunting conservation advocacy organization striving to
12 achieve a resident hunting priority for all Alaskans no
13 matter where they live. We're the only western state
14 that doesn't limit non-resident hunters and that's
15 having a negative effect on all of us no matter where
16 we live. We're trying to change that.

17
18 Resident Hunters of Alaska opposes this
19 proposal, WP26-31. This proposal has the objective of
20 providing additional opportunity to hunt moose but
21 preventing competition from non-Federally-qualified
22 users on Federal lands in Unit 13. It is that
23 competition the proponent says that is preventing rural
24 residents from meeting their subsistence needs. There
25 are no moose conservation concerns overall in Unit 13.
26 I mentioned previously that when proposals like this
27 pass we should document whether they achieve the
28 desired effect. In this case we do have documentation
29 from a previous Unit 13 closure to non-Federally-
30 qualified users and that shows that there was no
31 success regarding increased harvest rates by Federally-
32 qualified users. We attribute that to the longer
33 Federal moose season that already allows additional
34 opportunity to Federally-qualified users only.

35
36 We generally feel -- we genuinely feel
37 for the hardships people are encountering with the
38 decline of the Nelchina Herd, but based on the results
39 of the previous closure we just don't see this proposal
40 having the desired effect. Some of these proposals,
41 Mr. Chairman, and I want to tell you and the rest of
42 the Board with all due respect, they are dividing
43 Alaskans and causing more harm than good in the long
44 run when they pass. This Board should always explore
45 other biologically allowable options other than
46 disenfranchising Federally-qualified users. And I'm
47 really happy that you did exactly that with the passage
48 of Proposal WP26-28(b). You extended the moose season
49 in Unit 13, you provided a meaningful preference, I'd
50

0633

1 say let's just see how that works.

2

3 I guess I'll leave it at that. But
4 based on your actions on Proposals 26, 28(b), we ask
5 that you vote down Proposal 26-31.

6

7 Thank you, Mr. Chairman.

8

9 CHAIRMAN CHRISTIANSON: Thank you for
10 calling in. Any questions.

11

12 (No comments)

13

14 CHAIRMAN CHRISTIANSON: Next in the
15 que, please. Thank you.

16

17 MS. LAVINE: Next in the que is Donald
18 Mike.

19

20 MR. MIKE: Thank you, Mr. Chair. I
21 support WP26-31 as articulated by the Ahtna InterTribal
22 Resource Commission. And I'd like to read from their
23 written public comments on the last paragraph, last
24 sentence. It states: We urge the Federal Subsistence
25 Board to adopt this proposal in full to ensure that
26 Federal lands in Unit 13 fulfill the legal and moral
27 obligation to support indigenous subsistence users.
28 I'm reminded of past histories where the American
29 government took over indigenous lands during the
30 Colonial days that -- and then now we're facing with
31 Unit 13 sliver of small hunting areas that reduce our
32 Ahtna brothers and sisters to a small area to hunt.

33

34 Thank you.

35

36 CHAIRMAN CHRISTIANSON: Thank you,
37 appreciate you calling in to testify. Next in the que.

38

39 MS. LAVINE: Next in the que is Deanna
40 Kosbruk.

41

42 MS. KOSBRUK: Yes, thank you, Mr.
43 Chair. Board Members. Staff. For the record my name
44 is Deanna Kosbruk. I am a tribal citizen of Gulkana
45 Village and I'm just testifying personally. Just
46 mentioned before from my leaders that we are not
47 meeting our customary and traditional needs in our
48 region and that should be alarming in itself. And the
49 elder that was mentioned, Fred Ewan, that was my great-
50

0634

1 grandpa, just as many of my elders that have passed
2 before me, they were strong until they were gone on
3 this -- until they were done on this Earth, they
4 ensured that they had a successful harvest for their
5 family.

6
7 In our area our conservation concerns
8 are first and foremost so we only take what is needed
9 and a lot of the times that is one moose for a family.
10 And when I say, family, that's not a household, that's
11 parents to their kids to their grandkids, that's what
12 is shared, and that is because of our conservation
13 concerns.

14
15 We understand that -- I understand the
16 concerns of separation and -- but what I want to
17 mention and what was brought up to me is that we have
18 tribal citizens that will not qualify to hunt on these
19 Federal lands. They may not agree with it but they
20 understand why it is put forth. The proponents who had
21 put this proposal forth is a non-Native but it was
22 because of his connection to our tribal citizens that
23 he had heard and saw the concerns that we were not
24 meeting our customary and traditional needs. And,
25 personally, I don't feel the need that I have to
26 explain traditional practices to a body but when we
27 harvest that's part of our healing that brings us
28 together, it's practice for us to come together, it
29 brings us back together as a family, as a tribe, to
30 keep furthering our customaries and our traditions.

31
32 I just wanted to share that, you know,
33 just recently we had our annual meeting and I was
34 unaware that my coworker had caught a very good picture
35 and I had an air pod in my ear, this was over a year
36 ago, and I was listening to a Federal Subsistence Board
37 meeting while teaching my nephew how to cut a fish.
38 That is what is important to us, is for us to be able
39 to continue our practices and also understand our
40 conservation concerns are still there, but also for you
41 guys to understand the importance of our area and we
42 are over populated during hunting seasons as you will
43 continue to hear that, you know, there is a lot of
44 competition, there's safety concerns, there is resource
45 -- there's pressure on our resources out here that are
46 taken from our tribes. So I just wanted to share that
47 and thank you.

48
49 CHAIRMAN CHRISTIANSON: Thank you,
50

0635

1 appreciate you calling in today to share your lifeway.
2 Next please.

3

4 MS. LAVINE: Next in the que is
5 Madeline Demaske.

6

7 MS. DEMASKE: Thank you, Mr. Chair and
8 Members of the Federal Subsistence Board. Good
9 afternoon. For the record my name is Madeline Demaske
10 and I'm speaking on behalf of Safari Club
11 International. We strongly oppose Wildlife Proposal
12 26-31, which would close Bureau of Land Management
13 lands in Game Management Unit 13 to moose hunting by
14 non-Federally-qualified users. Not only does this
15 proposal lack Office of Subsistence Management support
16 but it runs counter to the directives set out in the
17 Alaska National Interest Lands Conservation Act.
18 Section .815 of ANILCA only allows this Board to close
19 Federal lands to non-Federally-qualified users when
20 necessary for the conservation of healthy populations
21 of fish and wildlife or to continue subsistence users
22 of such populations. Thus, ANILCA preserves the rights
23 of non-subsistence hunters to share in hunting
24 opportunities on public lands.

25

26 SCI fully understands and supports
27 ANILCA's priority for subsistence use opportunity,
28 however, the status of moose in this area does not
29 require that non-subsistence hunting be restricted to
30 protect the subsistence priority. According to Alaska
31 Department of Fish and Game data the moose population
32 in Unit 13 is stable. A closure of Bureau of Land
33 Management land in Unit 13 to non-Federally-qualified
34 users would not be necessary to ensure the continued
35 viability of healthy moose populations. Further, data
36 also indicates that the proposed closure will not
37 benefit subsistence use. In regulatory years 2020 to
38 2021 and 2021 to 2022, Units 13A and 13B were closed
39 to moose hunting by non-Federally-qualified users.
40 More recently 13B was closed to non-Federally-qualified
41 users for the 2024/2025, 2026 -- and 2026 regulatory
42 years. My apologies. Harvest reporting data shows
43 that none of these closures resulted in an increase in
44 moose catch by Federally-qualified users. Accordingly
45 the closure is also not necessary for the continuation
46 of subsistence users.

47

48 As I stated yesterday and as a
49 reminder, ANILCA does not authorize restricting non-

50

0636

1 Federally-qualified users due to perceived competition
2 between user groups. The Ninth Circuit, Ninilchik
3 Traditional Council versus United States found that:
4 Although ANILCA emphasizes the importance of
5 subsistence lifestyles it's other goals include the
6 preservation of non-subsistence hunting opportunities
7 which inherently result in competition. The proponents
8 made no showing that this limited restriction standard
9 has been satisfied, stating instead that the proposal
10 is primarily intended to address competition.

11

12 We respectfully urge the Board to
13 reject Wildlife Proposal 26-31 which would close BLM
14 lands in Game Management Unit 13 to moose hunting by
15 non-Federally-qualified users because it fails to
16 satisfy ANILCA.

17

18 Thank you for the opportunity to
19 comment on this important proposal.

20

21 CHAIRMAN CHRISTIANSON: Thank you. Any
22 more public testimony at this time Robbin.

23

24 MS. LAVINE: Our last person in the que
25 has the phone -- oops, has put their hand down. Thank
26 you, Mr. -- oops, no, 3683. The person with the last
27 four numbers of 3683, you can press star, six to unmute
28 yourself. You're ready to go.

29

30 (Pause)

31

32 MS. LAVINE: You -- let's see, 3683 we
33 can't hear you. Make sure that your mute button on
34 your phone is turned off.

35

36 MR. MARSHALL: Okay, am I coming in?

37

38 MS. LAVINE: There you go, we got you.

39

40 MR. MARSHALL: Good afternoon, Mr.
41 Chair and Board Members. This is Clint Marshall from
42 Tazlina, Alaska and I requested to testify.

43

44 CHAIRMAN CHRISTIANSON: You have the
45 floor.

46

47 MR. MARSHALL: Thank you. I am
48 testifying in support of WP26-31. I'm a -- I, of
49 course, reside in Tazlina, Alaska. I'm a member of the
50

0637

1 Tazlina Village but more importantly I'm just a member
2 of this community. And I'm testifying in support of it
3 because I know that there's been significant challenges
4 with the rural residents out here in filling their
5 freezers with what is actually a staple diet, it's not
6 like a side dish, this is something that people really
7 rely on. And, you know, I've heard a lot of comment
8 about that there aren't -- there isn't a shortage,
9 well, I can tell you that there is because I know a lot
10 of people who would normally rely on that moose meat
11 are not getting moose, and those who are sharing it
12 across a lot of families.

13

14 So one significant thing, you know, I
15 hear people testifying and saying that there's no
16 shortage, well, I would -- you know, there is. These
17 people really rely upon the moose. And the grocery
18 store up here is unbelievably expensive, and if you
19 don't 'believe me I'd invite anyone on the Board to
20 come shop at the IGA and buy some steaks there and see
21 how much it cost, along with anyone else from
22 Anchorage. If you're going to come up here and go
23 moose hunting, maybe spend some time at the local store
24 and see how much it cost to fill your freezer.

25

26 Anyways, I'm in support and I'll leave
27 it at that. I think enough has been said on the issue.

28

29 Thank you very much for your time.

30

31 CHAIRMAN CHRISTIANSON: Thank you, and
32 appreciate you calling in to testify today. Any more?

33

34 MS. LAVINE: (Shakes head negatively)

35

36 CHAIRMAN CHRISTIANSON: That concludes
37 the public testimony. Council recommendation on this.

38

39 MS. CAMINER: Thank you, Mr. Chair.
40 Southcentral recommendations, we had quite a discussion
41 over this as I imagine as you might as well, I'm sorry
42 to be the one to bring some of the tough ones to you.

43

44 The person who did put in this proposal
45 is actually on the RAC, he submitted it personally and
46 as Deanna said long, long time resident of the area and
47 who knows the people, knows the traditions and really
48 respects the tradition of hunting and fishing and is
49 doing his best to help everybody. Also wanted to

50

0638

1 remind you that this area, there's no caribou hunting
2 and people clearly depended on caribou heavily for many
3 years so moose is it at this point and it's very
4 important to them.

5
6 We recognize that actions that the you
7 took extending the season provides additional
8 opportunity to subsistence users. But, as you've
9 heard, and we noted, there's an extreme level of
10 competition with State users for moose in the area and
11 non-Federally-qualified users arrive, also as you've
12 said, in large numbers, high powered off-road vehicles,
13 basically sometimes out competing local people.
14 Federally-qualified users do not have comparable
15 equipment, not always able to access areas where they
16 feel they can safely hunt. If locals can get far
17 enough off the road system to hunt safely meat care
18 becomes very problematic and you've also heard about
19 warmer temperatures. The increased amount of time to
20 get meat out of the field, combined with warmer fall
21 weather makes safe handling of harvested meat a
22 concern. This competition is also eroding local
23 cultural practices as most wildlife is now coming from
24 the roadkill list, basically not what people really
25 have in mind for traditional use. This makes passing
26 along knowledge and tradition almost impossible and
27 makes it very difficult to keep culture alive.

28
29 The proponent stated that not all the
30 communities with C&T for moose in Unit 13 are qualified
31 to hunt in the Wrangell-St. Elias National Park and
32 Preserve, that exclusion makes the BLM lands even more
33 important. The Ahtna InterTribal Resource Commission
34 community harvest report indicates no moose harvest
35 have occurred in their Federal community harvest system
36 hunt for the last three years, despite substantial
37 hunting effort, suggesting that locals basically are
38 being out competed. This questionnaire also cites
39 reduced moose populations, environmental conditions,
40 access issues and increased competition as reasons for
41 this lack of success.

42
43 And we discussed all of this quite
44 thoroughly at our RAC meeting and felt that even though
45 it might not be a conservation concern, certainly the
46 conflict between users is a huge concern.

47
48 Thank you, very much.

49
50

0639

1 CHAIRMAN CHRISTIANSON: Thank you,
2 Judy. Eastern Interior did not consider.

3
4 MS. LAVINE: (Shakes head negatively)

5
6 CHAIRMAN CHRISTIANSON: Thanks. Next
7 we'll move on to Alaska Department of Fish and Game.

8
9 MR. MULLIGAN: Thank you, Mr. Chair.
10 For the record the Alaska Department of Fish and Game
11 opposes this proposal as it views it unnecessary under
12 Title VIII of ANILCA, especially now that you have just
13 given Federally-qualified users an extra 10 days of
14 opportunity where non-Federally-qualified users will
15 not be in the field. There are no conservation
16 concerns associated with the current management
17 strategy of harvesting bulls as we've heard under a
18 previous proposal where population objectives weren't
19 quite there but bull to cow ratios were and you offered
20 additional opportunity under that proposal.

21
22 For just a bit of history, the last --
23 the 1st closure where there was multiple GMUs involved,
24 so the closest one that we can compare to this one, was
25 in 2020 when you -- the Board, I shouldn't say you --
26 the Board closed 13A and B, prior to the closure the
27 success rate for Federally-qualified users was 14.3
28 percent but during the closure success fell in the
29 first season to 10.2 and then in the second to 11.9
30 percent. You guys have -- again sorry -- the Board has
31 considered closures recently in 2024, passed a closure
32 for only 13B but then in 2025 you denied a special
33 action to close 13C. While some of the GMU 13 subunit
34 moose populations are experiencing slight declines
35 overall the population in the unit is stable. The
36 current levels of bull harvest do not pose a biological
37 concern for the viability of moose populations in the
38 unit given the bull to cow ratios observed during moose
39 surveys annually. Federally-qualified users, even
40 before the passage of 28(b) had almost a 20 day
41 advantage with the State sea -- in addition to the
42 State season and then also in addition to that there
43 are private lands open to Federally-qualified users
44 that may not be open to non-Federally-qualified users.
45 We know we've heard a lot of information but just to
46 put it on the record, for the information that we are
47 gathering, we are meeting ANS for Unit 13 of 300 to 600
48 animals. We have consistently met or exceeded the
49 upper range of this amount since 2006 and this past
50

0640

1 season, which I believe was 2024, the ANS was near --
2 the upper end of ANS was nearly reached with the
3 harvest of 553 moose.

4

5 Just some other points to make, with
6 the closure of the Nelchina Caribou Herd we're actually
7 seeing a decrease in non-Federally-qualified user
8 participation. And then also to just make a point for
9 your consideration is that even with the closure of
10 moose hunting, if you do pass this, there are still
11 other big game animals, like brown bear, black bears
12 that are still going to be hunted and technically can --
13 those non-Federally-qualified users can still hunt on
14 those lands, there's no prohibition, only if they were
15 moose hunting.

16

17 Thank you, Mr. Chair.

18

19 CHAIRMAN CHRISTIANSON: Thank you. Any
20 questions for the State.

21

22 (No comments)

23

24 CHAIRMAN CHRISTIANSON: Hearing and
25 seeing none, InterAgency Staff Committee.

26

27 MS. LAVINE: Thank you, Mr. Chair. You
28 can read our full comments in your meeting materials.
29 The Federal Subsistence Board will need to consider a
30 few key sections of ANILCA before taking action on
31 proposals requesting closures and closure reviews.
32 Specifically those sections pertaining to Council
33 deference, that's Section .805(c) and those pertaining
34 to limitations to closures or restrictions of
35 subsistence and non-subsistence uses on Federal public
36 lands in Sections .815(c) 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.

42

43 The ISC appreciates the Council's
44 concerns for local hunters who face competition from
45 non-Federally-qualified users and warmer weather
46 affecting the safe handling of their harvest. The ISC
47 also recognizes the efforts of the Council to provide
48 local subsistence users additional opportunity without
49 competition through their support of Wildlife Proposal
50

0641

1 26-28. In the case of 26-31, the ISC suggests the
2 Council's recommendation may not meet the criteria for
3 deference.

4

5 Thank you, Mr. Chair.

6

7 CHAIRMAN CHRISTIANSON: Thank you,
8 Robbin. Board discussion, opportunity to ask questions
9 of Chairs and Liaisons.

10

11 MR. INGERSOLL: From the Forest
12 Service.

13

14 CHAIRMAN CHRISTIANSON: Yes, Jerry.

15

16 MR. INGERSOLL: Southcentral Council,
17 did you look at alternatives short of a full closure
18 here?

19

20 MS. CAMINER: Thank you for the
21 question. Through the Chair, Forest Service. We just
22 talked about the possibility of closures, not knowing
23 whether the extensions were going to go through so it
24 was another tool.

25

26 MR. INGERSOLL: And you spoke a little
27 bit to the effect of the extension, does that change in
28 any way, your support for the closure?

29

30 MS. CAMINER: Through the Chair. I
31 cannot really answer that because the Council would
32 have to discuss that.

33

34 MR. INGERSOLL: Thank you.

35

36 MS. CAMINER: Thank you.

37

38 MR. INGERSOLL: For Alaska, are there
39 -- I mean given that you're meeting the harvest goals,
40 but that Federally-qualified subsistence users are
41 reporting lesser success, are there any other tools
42 that the State of Alaska would recommend to try to
43 support Federally-qualified users within that, are
44 there any other tools that we could use to achieve the
45 purpose of continuing successful subsistence hunts?

46

47 MR. MULLIGAN: So you're asking me for
48 alternatives that you can employ to meet this?

49

50

0642

1 MR. INGERSOLL: Or that you could
2 employ, I mean are there.....

3
4 MR. MULLIGAN: So, okay, I mean through
5 the Chair. I don't know if everyone -- I mean a lot of
6 folks who have been around this table and the folks who
7 live there and have just been in the regulatory process
8 knows that Unit 13 has had a heroic road of trying to
9 find a way to figure out the solution to what you just
10 asked me. You know, for years there was tiers, I mean
11 we had Tier I, Tier II, then we went to community
12 harvest and then that basically got blown out of the
13 water because of a lawsuit and the decision and that's
14 why you see the State having to consider the larger
15 communi -- like I would say, not traditional
16 communities that we have -- that's because we got into
17 that court decision, it's not because that was the
18 original thing the Board of Game decision, several of
19 our Board of Game Chairs over the years have taken it
20 on to try to parcel this out and I don't know if -- how
21 that gets done. I mean, again, kind of similar to what
22 I've mentioned in the past, you know, do you try to go
23 to a registration that you have to sign up in the
24 communities during a certain amount of time, you know,
25 do you take it to a draw, you know, there's several
26 things that could be done and, you know, I know of a
27 few things during my lifetime that has been tried and I
28 just -- given the dynamics at play, the adjacency to
29 the population center of the State of Alaska, it is a
30 difficult thing and it is also something that I can't
31 say I could give you an answer without wanting to walk
32 through a much more extensive process and use other
33 people's experience and knowledge to try to solve.

34
35 CHAIRMAN CHRISTIANSON: Thank you for
36 that history Ben. Any other questions from the Board,
37 it's our opportunity.

38
39 (No comments)

40
41 CHAIRMAN CHRISTIANSON: Hearing and
42 seeing none we'll open up the Board for action.

43
44 MR. PENDERGAST: Mr. Chair. After some
45 careful consideration BLM moves to adopt Proposal 26-31
46 and if I get a second I'll explain why I intend to vote
47 to oppose my motion.

48
49 (Pause)

50

0643

1 MS. BOARIO: Fish and Wildlife Service
2 seconds.

3
4 MR. PENDERGAST: Thank you. I
5 appreciate folks patience, a little bit to read into
6 the record here, I, again, want to begin by
7 recognizing, acknowledging the challenge that
8 Federally-qualified subsistence users are facing in
9 this area. That is certainly not lost on me and I
10 don't think it's lost on this Board. Federally-
11 qualified subsistence users face strong competition
12 from other user groups in Unit 13, especially on
13 Federal lands that are closer to the road system. The
14 question before us should be how best to address this
15 challenge and whether a closure, though attractive to
16 many for understandable reasons, is likely to produce
17 the desired result. Proposal 26-28(b), which we just
18 passed is a targeted step which provides a meaningful
19 preference for Federally-qualified subsistence users
20 without the need for closures. A unit-wide closure for
21 certain Federal lands has been requested by the RAC to
22 help address the challenges of competition, but a
23 closure to non-Federally-qualified users, especially in
24 this area, appropriately has a high bar for supporting
25 evidence. As I've noted before, a closure is among the
26 most blunt and broadscale tools we have, especially
27 when applied, even on limited Federal lands across
28 multiple subunits in a unit as biologically diverse, as
29 we've heard today, as Unit 13, and as such it should be
30 employed very carefully.

31
32 At this time the available evidence
33 does not support closing BLM lands in Unit 13 to the
34 harvest of moose by non-Federally-qualified subsistence
35 users.

36
37 I would like to bring up for
38 illustration that this Board passed Wildlife Special
39 Action 24-06, which did close Federal lands in Unit 13B
40 to the harvest of moose by non-Federally-qualified
41 users for the 2024/25 and 2025/26 seasons but after a
42 few years now we lack evidence that this closure has
43 resulted in any meaningful preference. And while the
44 Federal moose harvest has been declining over the last
45 three years, so have the number of Federal hunters, the
46 State moose harvest, and the number of State hunters.
47 I'll also note that a closure to moose harvest by non-
48 Federally-qualified users on these lands in Unit 13,
49 which are generally in small areas close to the road
50

1 will not stop non-locals from accessing Federal lands
2 during the State moose season and will not prevent user
3 group conflict. Again, the recent adoption of Wildlife
4 Proposal 26-28(b), which extends the Unit 13 moose
5 season by 10 days will provide a more meaningful
6 preference as Federally-qualified subsistence users
7 will be able to harvest moose on Federal lands well
8 after the State season has ended. However, the
9 evidence does not support closing Federal lands in Unit
10 13 to the harvest of moose by non-Federally-qualified
11 users.

12

13 Thank you.

14

15 CHAIRMAN CHRISTIANSON: Thank you,
16 Kevin.

17

18 Frank.

19

20 MR. WOODS: Now, Mr. Chair, in
21 concurrence with BLM, we do have a high level of
22 scrutiny when it comes to passing proposals, especially
23 when it conflicts with the RAC recommendations. I'll
24 read some of them. The Federal Subsistence Board will
25 need to consider a few sections of ANILCA before taking
26 action on proposals requesting closure and closure
27 reviews, specifically those sections in Title VIII
28 pertaining to Council deference and limitation to
29 closures and restrictions of subsistence uses and non-
30 subsistence uses on public lands. The next three
31 paragraphs of my readings are real important for us.

32

33 ANILCA, Section .818(3) clarifies that
34 nothing in this title shall be constructed as
35 authorizing the restriction of taking of fish and
36 wildlife for a non-subsistence user on public lands
37 unless necessary for the conservation of healthy
38 populations of fish and wildlife for the reasons set
39 forth in .816, but, for the continued subsistence uses
40 of such populations or pursuant of other -- accept
41 applicable law. ANILCA Section .816 allows a closure
42 or restriction of Federal public lands to subsistence
43 uses for Federal and -- fish and wildlife for reasons
44 of public safety, administration or ensure the
45 continued viability of particular fish and wildlife
46 populations. This is the last one and it's real
47 important for us: ANILCA Section .805(c) the Board
48 must consider the recommendations of the Councils
49 concerning the taking of fish and wildlife on public
50

0645

1 lands in a region and may choose not to follow
2 recommendations only if not supported by substantial
3 evidence, violates recognized principles of fish and
4 wildlife conservation or would be detrimental to the
5 satisfaction of subsistence needs.

6

7 We heard testimony that the local
8 villages and the Federally-qualified subsistence users
9 weren't meeting those needs and I'll put it forward
10 bluntly, is I am in support of this proposal for that
11 specific reason. We have a list of huge responsibility
12 when it comes to this type of action and I believe we
13 take it seriously and I thank the BLM for bringing
14 forth the concern because they are serious concerns and
15 I'll stop and let the process and hopefully more
16 comments and more input be litigated.

17

18 Thank you.

19

20 CHAIRMAN CHRISTIANSON: Any other Board
21 discussion, deliberation.

22

23 Kevin.

24

25 MR. PENDERGAST: I thought it might be
26 helpful to the discussion to also help folks understand
27 that talking with BLM law enforcement about this, this
28 is not, practically speaking, a very enforceable
29 measure, were we to close these lands. The scale of
30 use is such and the land pattern is broken up to a
31 degree that to actually to try to go out and determine,
32 you know, whether or not folks are legally hunting in
33 the proper area is extraordinarily difficult, certainly
34 beyond our resources to say we could effectively
35 manage. So, again, I would urge folks to consider --
36 and I understand why it's an attractive proposal to
37 many, but will it have the desired effect and I just --
38 I don't think that the evidential bar has been met to
39 say that that would be true.

40

41 MR. WOODS: Mr. Chair. Reading through
42 public comments, reading through all the information
43 and statewide, hunting seasons have moved later in the
44 year. We went through three or four proposals before
45 this that the later the seasons are, the later harvest
46 success rates are happening. We did that -- I agree
47 with BLM and their analysis, that isn't going to fix
48 the problem that we have in front of us, those are just
49 statewide, and it always will be continuing to change.

50

0646

1 This proposal identifies specific reasons why the
2 proposer is asking us to restrict hunting and fishing
3 on Federal lands, and it looks like only a -- one thing
4 I want to point out, is, part of the analysis is it
5 will restrict Federally-qualified subsistence users
6 from operating on certain properties too, so they took
7 the initiative and you heard in public testimony that
8 they took the initiative to address those areas that
9 help and would also detrimentally affect those, that
10 sacrifice for that small group, is better for the
11 benefit of all. Those things are real important,
12 number 1, because for me, it looks like they're willing
13 to stop and help their neighbors on other Federal
14 lands, it looks like the Wrangell National Park, maybe
15 somebody else could -- but just in summary, for the
16 purpose of this, the last statement I read, that
17 violates recognized principles, fish and wildlife
18 conservation, and detrimental to the satisfaction of
19 subsistence needs is why I addressed this proposal the
20 way I did.

21

22 Thank you, Mr. Chair.

23

24 MS. BOARIO: Thank you, Mr. Chair. A
25 question for the Board also, just to stay focus on kind
26 of the decision criteria in front of us, I mean a super
27 valid point our colleagues at BLM are making about
28 enforcement capacity or capability, I don't know if
29 that is a relevant criteria to the decision before us
30 and I'm just asking for a conversation perspective or
31 an answer from, sorry, our solicitor?

32

33 MR. PENDERGAST: Well, I would just add
34 -- Kevin with BLM -- that's why I didn't include in my
35 motion, it's really provided for context and color, I'm
36 not including it in my motion.

37

38 MS. BOARIO: I just wanted to make sure
39 I was staying focused.

40

41 CHAIRMAN CHRISTIANSON: Yeah, I think
42 enforcement is missing all across the state, I mean you
43 come to every region and any place and you're lucky to
44 see one.

45

46 MR. PENDERGAST: And.....

47

48 MS. BOARIO: This.....

49

50

0647

1 CHAIRMAN CHRISTIANSON: Sara and then
2 Kevin.

3
4 MS. BOARIO: And I apologize to our
5 Solicitor for putting her on the spot as well, and it
6 might not be a question we can get to the bottom of
7 right now but I have heard over the last couple of
8 days, the Ninilchik versus the United States come up,
9 and the concern about the use of the word, competition,
10 and the piece of that, if I'm remembering and
11 reflecting back on that case, was, it was about -- and
12 I just pulled the old language but I could be reading
13 it wrong: the government explains that the advanced
14 season -- and I apologize, these are not relative GMUs,
15 the government explains that the advanced season for
16 GMU 15A is shorter than that authorized for GMUs 15B
17 and 15C so as to prevent conflict with the State
18 regulated non-subsistence bow and arrow hunt, by its
19 own admission then the Board restricted the harvesting
20 of moose for subsistence uses in order to give
21 preference to non-subsistence hunting, which they then
22 say is a violation, I'm not a lawyer, but that case has
23 come up twice and I want to have some clarity, I guess,
24 on that point.

25
26 Thank you.

27
28 (Pause)

29
30 MS. DOEHL: Through the Chair. Let me
31 first talk about the criteria for closures to non-
32 Federally-qualified subsistence users. This has been
33 touched on before by the ISC. I am going to start with
34 Section -- ANILCA -- or Section .815(3) of ANILCA, I'll
35 start with that.

36
37 Member Frank Woods also discussed this,
38 but ANILCA authorizes a restriction on the taking of
39 fish and wildlife for non-subsistence uses on the
40 public lands other than National Parks and Park
41 Monuments unless necess -- unless necessary for the
42 conservation of healthy populations of fish and
43 wildlife, or for the reasons set forth in Section .816
44 of ANILCA, or to continue subsistence uses of such
45 populations, or pursuant to other applicable law.

46
47 The criteria referenced in .816 of
48 ANILCA for closures other than -- for closures to
49 subsistence uses of a particular fish or wildlife
50

0648

1 population, are only if necessary for reasons of public
2 safety administration or to ensure the continued
3 viability of such population.

4
5 So any of those reasons would also be
6 reasons covered in .815(c) of ANILCA as well the
7 additional reasons of .815(c), which includes to
8 continue subsistence uses of such populations or
9 pursuant to other applicable law.

10
11 I will also note that the Board has a
12 policy on closures and that policy has additional --
13 discusses review of proposed closures and basically
14 reiterates that and those sections of ANILCA and
15 similar sections in the regulations. And, you know,
16 the Board will base its actions on substantial evidence
17 contained within the administrative record and on the
18 best available information, complete certainty is not
19 required. If the Board's action is inconsistent with a
20 Council recommendation, then the Board will explain its
21 rationale pursuant to the regulations, the comparable
22 Forest Service and Interior regulations, the Interior
23 one being at 43 CAR 51.10(e)(1), which I can also read
24 so that everyone has it at top of mind and 10(e)(1) is
25 -- speaks to the relationship between the Board and
26 Regional Councils, and states the Board shall consider
27 the reports and recommendations of the Regional
28 Councils concerning the taking of fish and wildlife on
29 public lands within their respective regions for
30 subsistence uses. The Board may choose not to follow
31 any Regional Council recommendation which it determines
32 is not supported by substantial evidence, violates
33 recognized principles of fish and wildlife
34 conservation, would be detrimental to the satisfaction
35 of subsistence needs, or in closure situations, for
36 reasons of public safety or administration or to assure
37 the continued viability of a particular fish or
38 wildlife population. If a recommendation is not
39 adopted the Board shall set forth the factual basis and
40 the reasons for the decision in writing in a timely
41 fashion.

42
43 CHAIRMAN CHRISTIANSON: Thank you. I
44 think that gives us a side bar. I think Kevin wants to
45 be recognized.

46
47 MR. PENDERGAST: Thank you. I
48 appreciate that reading by the Solicitor and just to
49 continue adding to the discussion here. Again, I think
50

0649

1 we've heard multiple times stated this afternoon that,
2 you know, folks were unsure which of the various
3 proposals might be passed or be successful, one of
4 which was 28(b), which we did pass, all of which seem
5 to be aimed at the same issue, which is competition in
6 Unit 13. So, again, this Board has taken action this
7 afternoon, decisive action in a targeted way to help
8 address that situation, and I just don't see that we're
9 presented with any new evidence that would support an
10 additional closure on top of that and certainly not for
11 conservation purposes so, you know, I just think one
12 step at a time, and seeing how the 10 day extension
13 plays and hopefully provides the needed affect would be
14 BLM's position.

15

16 CHAIRMAN CHRISTIANSON: I'm ready for
17 Board action. Please read into the record the motion
18 and roll call please.

19

20 MS. LEONETTI: The motion is to adopt
21 Wildlife Proposal 26-31.

22

23 BLM Member Pendergast.

24

25 MR. PENDERGAST: Make sure I get my
26 thing right. So the motion was to adopt, so I oppose.

27

28 MS. LEONETTI: BIA Member John.

29

30 MS. JOHN: BIA votes to adopt WP26-31
31 in deference to the Southcentral RAC. We concur with
32 the Council's justification regarding the importance of
33 these Unit 13 Federal lands and their concerns about
34 how sporthunting competition may be affecting moose
35 harvest by subsistence users. The extensive testimony
36 from the Ahtna InterTribal Resource Commission plus
37 other rural residents regarding their difficulties with
38 meeting their subsistence moose needs and how much
39 competition is impacting these abilities is much
40 appreciated. Our decision to vote for the closing of
41 these Federal lands is carefully considered and is
42 based on this valuable local knowledge. With the
43 ongoing decline in the region's caribou herds moose
44 have become a very important food source and we feel
45 that adopting this proposal will be necessary to
46 continue subsistence uses for Unit 13 rural residents.

47

48 Quyana.

49

50

0650

1 MS. LEONETTI: Forest Service Member
2 Ingersoll.

3
4 MR. INGERSOLL: This is a tough one and
5 I deeply appreciate the testimony of all of those who
6 have come to it. Forest Service opposes in order to
7 give the action that we just took on 28(b) a chance to
8 work and see if that can help address the issue and
9 then if it does not it would be timely then to bring a
10 future proposal.

11
12 MS. LEONETTI: Park Service Member
13 Patton.

14
15 MS. PATTON: Thank you, Mr. Chair and
16 Members of the Board. For the record this is Eva
17 Patton sitting in for our Director Don Striker who
18 needed to step out. He did speak to me briefly before
19 leaving that this is a very difficult decision.
20 Hearing the public testimony and hearing from our
21 Regional Advisory Council members and understanding
22 that there are declines to many subsistence resources
23 in this region, decline of the Nelchina Caribou Herd
24 and that the effort that has been made in the past few
25 years, as we heard from the community harvest, the
26 Ahtna InterTribal community harvest, not getting any
27 moose for significant effort. We've heard extensive
28 testimony on, you know, great amount of user effort on
29 these Federal public lands on an accessible road system
30 and the importance of accessing those areas for
31 subsistence. I do think, also, you know, that our
32 Director is also looking to the criteria to be met in
33 terms of a closure and the passage of the extension of
34 the moose season by 10 days will afford a subsistence
35 opportunity and an opportunity to see the effects of
36 that, if the hunt may be more successful and,
37 therefore, would vote to oppose the closure and
38 hopefully see that the extension of the moose season by
39 10 days would afford for a subsistence opportunity and
40 hopefully subsistence harvest success and as noted by
41 our Forest Service Member here too to revisit whether
42 that's successful in providing that opportunity in the
43 future.

44
45 Thank you, Mr. Chair.

46
47 MS. LEONETTI: Public Member Woods.

48
49 MR. WOODS: Public Member Woods
50

0651

1 supports Proposal WP26-31 and on our list of
2 recommendations and OSM assessments -- I struggle with
3 this one too because we're going to be faced with many
4 of these before us that we're trying to find a solution
5 that will help Federally-qualified subsistence users
6 meet their subsistence needs, they haven't been in the
7 last three years and there hasn't been in a long time.
8 Everybody mentioned the caribou decline, the
9 population, the overflux of resource, dual management,
10 we got a list of stuff we could go off of, but if they
11 haven't met their subsistence needs in the last three
12 years, I don't know if they could wait another two or
13 three years. That's my stance.

14

15 So I am in full support of this. I
16 know we have criteria and I've read those and I think,
17 for me, you know, it recommends that I follow some of
18 those pretty stro -- I take closures pretty seriously
19 and this is a tough one so thank you.

20

21 MS. LEONETTI: Fish and Wildlife
22 Service Member Boario.

23

24 MS. BOARIO: Fish and Wildlife Service
25 opposes for the reasons shared by my colleagues at BLM,
26 Park Service and Forest Service and I share with
27 everyone at the table the challenge and struggle with
28 this one, and am hopeful as others have already said
29 that the extension -- the season extension that we just
30 passed for 26-28(b) will help with opportunity for
31 Federally-qualified subsistence users in 13. I'm
32 concerned about the continuing declines in 13B and 13D
33 and also concerned that the closures that we put in
34 place there the last two years did not result in more
35 success leading me to support the -- again, the more
36 time of 26-28(b) and I'm hoping that -- see how that
37 goes.

38

39 Thank you.

40

41 MS. LEONETTI: Public Member Payenna.

42

43 MR. PAYENNA: Quite a bit of discussion
44 here on this one, but in concurrence with comments made
45 by BIA and Public Member Woods I'm inclined to support
46 WP26-31.

47

48 MS. LEONETTI: Public Member Oney.

49

50

0652

1 MR. ONEY: Public Member Ray Oney moves
2 to support WP26-31 in deference to Southcentral RAC and
3 articulated by Ahtna and the many people that have
4 testified online and in person.

5
6 MS. LEONETTI: Public Member Pitka.

7
8 MS. PITKA: I vote to support WP26-31
9 in deference to the Southcentral Regional Advisory
10 Council. And in recognition that the decreased
11 subsistence hunting success is a direct result of a
12 lower population and the continuation of subsistence
13 uses of wildlife and the conservation of healthy
14 populations of that wildlife. Thank you.

15
16 MS. LEONETTI: Chair Christianson.

17
18 CHAIRMAN CHRISTIANSON: Really good
19 discussion. I have to support the proposal in
20 deference to the RAC and like you said, it's not that
21 big of an area and hearing the permit that we did
22 authorize to Ahtna, I know we did an extension in
23 giving them opportunity, I was in favor, but as I
24 listen to compelling testimony I was actually going to
25 vote the other way but in deference mandated by
26 Washington, D.C., that's why we have additional Board
27 members up here is to weigh heavily on the rural
28 preference and needs of the rural users, being those
29 and value the Regional Councils work as they look at
30 the same criteria we do as they look at these and have
31 more firsthand realtime face to face interaction with
32 the rural members and it is a highway and they live in
33 a really heavily utilized area for lots of reasons, I
34 mean everybody in the state drives through that region
35 and so for that, a little reprieve won't hurt, I
36 support.

37
38 MS. LEONETTI: Mr. Chair, the motion
39 carries 6 to 4.

40
41 CHAIRMAN CHRISTIANSON: We'll take a
42 five.....

43
44 (Applause)

45
46 CHAIRMAN CHRISTIANSON:minute
47 break before we get to Southeast. Let's take five.

48
49 (Off record)

50

0653

1 (On record)

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(On record)

CHAIRMAN CHRISTIANSON: It is Friday at 4:00 o'clock and we only got Southeast left.

(Laughter)

CHAIRMAN CHRISTIANSON: Like President Clint said earlier, they've been patiently waiting so thank you guys for that. Staff we'll go ahead and get started with WP26-03, 04, 05, Unit 2 deer.

MR. ROBERTS: Good afternoon, Mr. Chair. Members of the Board. I'm Jason Roberts, Anthropologist at OSM and I'll be presenting a summary of the analysis of Wildlife Proposals WP26-03, 04 and 05. The analysis of these proposals begins on Page 491 of your meeting book.

Proposal 26-03 was submitted by the Southeast Council, they request to close Federal public lands in Unit 2 to deer hunting by non-Federally-qualified users; 04 was also submitted by the Southeast Council, it requests conducting an ANILCA Section .804 subsistence user prioritization analysis for Unit 2 deer; and WP26-05 was submitted by the Ketchikan Indian Community, it requests restricting non-Federally-qualified users to the harvest of one buck only in Unit 2 with a season start date of August 15th. This proposal also requests restricting Federally-qualified users who do not reside on Prince of Wales to the harvest of two bucks in Unit 2 via a Section .804 analysis.

All three proposals were submitted due to conservation concerns and the need to continue subsistence uses of deer. These proposals were analyzed together because they're related. Restrictions to non-Federally-qualified users are enacted before restricting Federally-qualified users via Section .804.

In 2003 the Board adopted a proposal that opened the Unit 2 deer season earlier shifting the start date from August 1st to July 24th so that subsistence users would have several days to hunt early in the season without competition from non-Federally-qualified users. That same year the Board considered a proposal that requested a closure to non-Federally-

1 qualified users from August 1st to September 1st along
2 with a reduced harvest limit to reduce competition for
3 a declining deer population. The Board ultimately
4 adopted that proposal with modification instituting a
5 closure to non-Federally-qualified users from August
6 1st to the 21st, but rejecting the proposed harvest
7 limit reduction. That closure was initially set to
8 last for one year. The adoption of those two proposals
9 in 2003 was controversial, and then in 2004 13
10 proposals were submitted seeking to rescind, modify or
11 enhance the changes enacted the previous year. The
12 Board ultimately modified version of one of these
13 proposals which retained the earlier season opening for
14 subsistence users and an August 1st to 15th closure to
15 non-Federally-qualified users. In 2006 the Board
16 adopted a proposal to exclude the southeastern portion
17 of Prince of Wales Island from the Unit 2 closure area
18 aligning regulations more closely with ADF&G
19 recommendations and providing greater opportunity for
20 non-Federally-qualified users. In 2015 a proposal was
21 submitted requesting to limit non-Federally-qualified
22 users to the harvest of two deer on Federal lands in
23 Unit 2 and extend the season through January 31st. At
24 this time the Southeast Council supported the season
25 extension but not the request to restrict non-
26 subsistence users and reduce their harvest limit and
27 the Board adopted this proposal with the Council's
28 modification. In 2017 the Council submitted a proposal
29 to limit non-Federally-qualified users to the harvest
30 of two bucks on Federal lands in Unit 2 and shortened
31 their season by at least a week after hearing extensive
32 testimony that local subsistence users were having
33 increasing difficulty meeting their needs due to
34 competition and habitat loss. The Board adopted this
35 proposal with modification reducing the harvest limit
36 for non-Federally-qualified users but leaving the
37 season length unchanged. That same year the Board also
38 adopted the Southeast Council's proposal to expand the
39 customary and traditional use determinations for deer
40 in Units 1 through 5 so that all rural residents of
41 these units would be eligible to hunt deer under
42 Federal regulations throughout the Southeast. And as
43 you know in February of 2025 the Board adopted NDP25-01
44 reclassifying Ketchikan as a rural community.
45 Ketchikan residents subsequently became Federally-
46 qualified users with customary and traditional use
47 determinations for Unit 2 deer gaining higher harvest
48 limits and a longer hunting season. And this is
49 important because Ketchikan residents were previously
50

1 the primary group of non-Federally-qualified users
2 hunting in Unit 2.

3
4 Looking at habitat, logging related
5 habitat loss, predation by wolves and bears, winter
6 severity and hunting pressure are the primary factors
7 affecting deer populations in Unit 2. Since 1954
8 Prince of Wales Island has experienced the highest
9 levels of logging in the Southeast. Logging here has
10 significantly reduced the available old growth winter
11 habitat, expanded low value stem exclusion stands, and
12 diminished overall habitat connectivity. ADF&G has
13 estimated that more than 40 percent of Unit 2's
14 original old growth forest has been logged over the
15 past 50 years and that the legacy of these timber
16 harvest will continue to negatively impact wildlife
17 populations on the island.

18
19 In the 1990s ADF&G and U.S. Forest
20 Service reported that deer populations would decline as
21 old growth clearcutting continued with the population
22 models projecting declines in deer carrying capacity of
23 50 to 60 percent by the end of the logging rotation in
24 2054. Long-term consequences of this habitat loss were
25 expected to include diminished hunting opportunities
26 and the inability to provide for subsistence needs with
27 few areas within the road accessible logged portions of
28 Unit 2 expected to be able to meet hunter demand by the
29 end of the rotation. More recent U.S. Fish and
30 Wildlife Service analysis from 2015 and 2016 projected
31 a 21 to 33 percent decline in the Unit 2 deer
32 population over the next 30 years due to habitat loss
33 from prior logging, with future logging such as the
34 proposed Twin Mountain Timber sale and severe winters
35 expected to intensify these declines.

36
37 Predation has also been noted to
38 influence deer numbers in Unit 2. Black bears commonly
39 prey on fawns during the birthing season. Residents
40 also report that deer abundance tends to decrease when
41 wolf numbers rise and that wolf trapping can improve
42 deer hunter success in the areas of trapping and high
43 predator densities may depress deer populations or
44 prolong recovery following severe winters.

45
46 ADF&G and the Forest Service have
47 historically used indices like deer pellet counts,
48 aerial surveys and harvest reporting data to assess
49 deer population trends in the Southeast. Early 2000
50

1 reports estimated that the Unit 2 deer population was
2 roughly 55,000 animals and the Board of Game currently
3 has a population objective of 71,000 deer and an
4 overall yearly harvest objective of 27,000 -- or
5 2,700. However, pellet counts and aerial surveys were
6 discontinued prior to 2020 in favor of developing more
7 accurate estimation techniques and no population
8 estimates are currently available to determine whether
9 the population objective is being met. Currently,
10 hunters self-reported harvest and effort data are the
11 only quantitative indicators available for tracking
12 deer population trends in Unit 2. But these data
13 should be interpreted cautiously as reporting rates can
14 be too low to generate accurate statistical estimates
15 and deer harvest is influenced by factors other than
16 just abundance. Southeast Council members have also
17 regularly noted that calculations of hunter effort and
18 harvest success based on reporting data may be
19 misleading because subsistence users often only
20 document their successful hunts.

21
22 With this in mind between 1997 and 2024
23 an estimated average of 1,045 Federally-qualified users
24 and 950 non-Federally-qualified users harvested just
25 over 2,600 deer from Unit 2 each year. The estimated
26 harvest generally increased from 2006 to 2016 peaking
27 in 2015 with over 4,000 deer harvested. However,
28 harvest have declined well below the 2,700 animal
29 objective since 2017. The lowest total harvest during
30 the entire 28 year period for which we have data took
31 place in 2023 and 2022 and total harvest increased
32 somewhat during the 2024 hunting season. Overall there
33 was a 45 percent reduction in average yearly harvest
34 between that peak time from 2006 to 2016 and more
35 recently from 2017 to 2024, however, the difference in
36 average yearly harvest between the earlier 1997 to 2005
37 period and the more recent 2017 to 2024 is smaller,
38 it's about 12 percent.

39
40 Recent declines in harvest coincide
41 with declines in hunter numbers, reported hunter
42 numbers as well as declines in deer harvested per
43 hunter and declines in hunter success rate for all
44 users. The number of days hunted per deer harvested
45 has also increased for all users in recent years.
46 While fewer hunters contribute to a lower harvest the
47 increasing effort required to harvest fewer deer
48 suggest the declining or less accessible deer
49 population particularly in heavily used areas.
50

1 Observation and knowledge shared by the Southeast
2 Council and testifiers at Council meetings also point
3 to a declining or less accessible Unit 2 deer
4 population. The two buck harvest limit for non-
5 Federally-qualified users that took affect in 2018 may
6 have also reduced harvest for non-Federally-qualified
7 users though it's full impact is unclear because
8 participation in harvest by both Federally and non-
9 Federally-qualified users have declined since this
10 time.

11
12 Historically Ketchikan residents were
13 the primary non-Federally-qualified users hunting deer
14 in Unit 2, followed by non-resident hunters. Ketchikan
15 residents accounted for over half of all non-Federally-
16 qualified hunters and harvest from 1997 to 2024 with
17 non-resident participation increasing substantially
18 during this period. But like most other users,
19 Ketchikan residents have also decreased their hunting
20 and harvesting activities in Unit 2 since 2017. While
21 deer hunting and harvest have been decreasing in Unit 2
22 in recent years they've generally been increasing in
23 Unit 1A. Deer populations in Unit 1A appear healthy
24 and road construction on Ravina -- Gravina and
25 Revillagigedo Islands have increased access.

26
27 So Proposals 25-04 and 26-05 ask the
28 Board to make a Section .804 determination for Unit 2
29 deer. An ANILCA Section .804 determination identifies
30 which Federally-qualified subsistence users should
31 retain a priority for the take of a limited resource
32 when harvest restrictions are needed due to significant
33 conservation concerns or the need to ensure the
34 continuation of subsistence uses among a subset of
35 users most dependent on the resource. Three criteria
36 are used to make this determination: Customary and
37 direct dependence upon the population as the mainstay
38 of livelihood; local residency or proximity to the
39 resource; and the availability of alternative
40 resources. The customary and traditional use
41 determination for Unit 2 deer currently includes all 34
42 rural communities in the Southeast. Table 5 on Page
43 523 of your meeting book shows recent population and
44 economic information for these communities organized by
45 wildlife management unit, it also provides an estimate
46 of their distance from Unit 2. Most of the deer
47 harvest and hunting effort, not surprisingly, in Unit
48 2, comes from communities closest to the unit. From
49 '97 to 2024 residents of Unit 2 and 1A accounted for an
50

1 average of over 75 percent of all hunters and harvest
2 taken from Unit 2 each year with Unit 2 residents
3 accounting for the largest share, followed by Unit 1A
4 residents. Unit 3 residents accounted for about five
5 percent of hunters and harvest during this period.
6 With more distant communities in Units 1C, 1D, 4 and 5
7 accounting for only a small portion of overall hunting
8 and harvest activity during this period.

9
10 Table 7 and 8 on Pages 530 through 535
11 show harvest and use data compiled from subsistence
12 surveys. In units where multiple surveys have been
13 conducted, Units 4 and 2 exhibited the highest average
14 deer harvest per person and deer accounted for the
15 largest share of total subsistence harvest. Similarly,
16 communities in Units 4 and 2 generally used, attempted
17 to harvest, successfully harvested, and shared deer at
18 higher rates than communities in other units. Based on
19 these hunting patterns and issues of proximity, Unit 2
20 residents display the greatest dependence on Unit 2
21 deer, followed by users in Unit 1A and 3. In
22 appendices A and B break this information down by
23 individual communities within these units.

24
25 Criterion 3. In times of resource
26 shortages some communities have greater access to
27 alternative subsistence resources and store bought
28 foods and goods and this is a consideration we make in
29 the Section .804 process.

30
31 So all rural residents of Units 1
32 through 5 may hunt and harvest deer under Federal
33 regulations wherever they apply but in practice most
34 residents are likely limited by time and money to
35 hunting in proximity -- reasonable proximity to their
36 homes. Table 11 outlines current deer hunting
37 opportunities under Federal regulations in Units 1
38 through 5. This information also provides context for
39 evaluating residents ability to meet their subsistence
40 needs in their home units as well as potential sources
41 of additional deer nearby and other wildlife resources.

42
43 Unit 4 has the highest deer harvest
44 limit under Federal regulations followed by Units 2,
45 1C, 1A and 1B. Units 3 and 5A each only allow one buck
46 per season and Unit 1D currently has no Federal open
47 season. Units 2 and 4 also have the fewest alternative
48 wildlife species available with deer being the only
49 large ungulate available in Unit 2. Although Unit 3
50

1 residents have a lower deer harvest limit in their home
2 unit they have access to moose and elk and have
3 historically traveled to Southern Admiralty Island in
4 Unit 4 and portions of the mainland in Unit 1B to
5 harvest deer. Unit 1A residents may harvest 4 bucks as
6 well as goat, moose and black bear and also have a
7 history of traveling to Unit 2 to hunt deer. Rural
8 residents from more distant communities, as I said
9 before, have not exerted much deer hunting pressure in
10 Unit 2 over the past several decades.

11

12 Ketchikan serves as the regional hub
13 for southern Southeast Alaska giving residents of
14 Ketchikan, Saxman and Metlakatla generally greater
15 access to goods and services than Unit 2 residents.
16 Many residents of Units 1C, 1D, 4, 5 and parts of Unit
17 3 likely rely more on Juneau for these services. Units
18 2 and 3 have fewer grocery stores and store bought
19 foods are generally more limited and more expensive
20 than in the Ketchikan Gateway Borough. Unit 2
21 households have also exhibited some of the regions
22 lowest median incomes and highest poverty rates during
23 recent census periods.

24

25 The OSM conclusion and it is a bit
26 different than the Council's recommendation, is to
27 oppose WP26-03 due to the existing closure and harvest
28 limit restrictions for non-Federally-qualified users
29 already in regulations; to support WP26-04 with
30 modification to close only the Northwestern portion of
31 Prince of Wales from July 24th to August 15th to non-
32 prioritized subsistence users and reduce the harvest
33 limit for these users to two bucks; and to take no
34 action on WP26-05 due to the actions taken on the
35 previous two proposals.

36

37 Justification is that deer are the
38 primary terrestrial food source for residents of Unit 2
39 and they've consistently ranked among the most heavily
40 used and shared resources here since harvest surveys
41 began in the '80s. Reduced access to deer creates
42 significant hardships for Unit 2 households with
43 limited means to offset wild harvest with store bought
44 foods. Many Unit 2 residents reported unmet
45 subsistence users needs -- to meet their -- unmet
46 subsistence needs for deer even before Ketchikan's
47 rural status change and recent harvest data indicate it
48 is taking all users longer to harvest fewer deer here.
49 Unit 2 residents demonstrate the highest customary and
50

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1 direct dependence on Unit 2, live closest to the
2 resource and generally have access to fewer alternative
3 resources than non-Federally-qualified users residing
4 in urban areas and nearby Federally-qualified users.

5
6 The long-term trend of declining deer
7 habitat decreasing or less accessible deer populations
8 and high hunter competition in the most road accessible
9 portions of Unit 2 warrants adopting WP26-04 with
10 modification. Restricting non-Federally-qualified
11 users and non-prioritized subsistence users to the
12 degree requested by the proponents is likely not
13 necessary as most of the hunting pressure on Unit 2 is
14 concentrated along roads and near communities in the
15 area of the current early season closure to non-
16 Federally-qualified users. The OSM modification should
17 provide a meaningful compromise intended to promote a
18 healthy Unit 2 deer population while ensuring the
19 continuation of subsistence uses by residents of Unit 2
20 without completely closing or restricting non-local
21 hunting opportunities.

22
23 And that's the end of my presentation,
24 Mr. Chair.

25
26 CHAIRMAN CHRISTIANSON: Thank you. Any
27 questions for Staff on this.

28
29 Jerry.

30
31 MR. INGERSOLL: Forest Service. First
32 of all, just want to acknowledge the amazing amount of
33 analysis conducted in a very short period of time
34 overlapping with the government shutdown. This is --
35 this full Section 804 analysis is very impressive to
36 have done it in record time and it's very thorough and
37 so I want to thank Staff for that.

38
39 And then I want to ask, there was an
40 iterative approach I understand in this between OSM and
41 the Council, and so am I right in saying that the OSM
42 conclusions were provided to Council before their last
43 meeting and so the Council was then able to be informed
44 by OSM's recommendations and develop their own final,
45 which you didn't have a chance to review during this
46 process, but there was a step-wise process to get to
47 where they landed; is that right?

48
49 MR. ROBERTS: Yes. Through the Chair.
50

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1 We presented the OSM conclusion to the Council at their
2 most recent meeting and they developed their own
3 recommendation.

4

5 MR. INGERSOLL: Thank you.

6

7 CHAIRMAN CHRISTIANSON: Any other
8 questions for Staff.

9

10 (No comments)

11

12 CHAIRMAN CHRISTIANSON: Did we receive
13 any written public comment, thank you.

14

15 MR. ROBERTS: Yes. Through the Chair.
16 During that initial open period for written public
17 comments we received two comments. One supported WP26-
18 03 and WP26-05 and did not take a position on 04. This
19 person wrote that 03 supported that because deer
20 populations in the most road accessible portions of
21 Prince of Wales cannot support the current level of
22 hunting pressure and local harvesters who primarily
23 utilize these hunting areas are having a hard time
24 harvesting sufficient deer. This commentor noted that
25 for 05, he saw this as a reasonable compromise to
26 address the situation being experienced by subsistence
27 users on Prince of Wales without unnecessarily
28 restricting non-local hunters.

29

30 The second commenter opposed all three
31 proposals stating that they were not necessary for
32 conservation purposes and unfair to non-local users.

33

34 CHAIRMAN CHRISTIANSON: Thank you.
35 Summary of tribal government and Alaska Native Corp.

36

37 MR. LIND: Thank you, Mr. Chair.
38 There was submission of a joint resolution 26-03 by
39 four tribes, Craig Tribal Association, Klawock
40 Cooperative Association, Hydaburg Cooperative
41 Association and Organized Village of Kasaan and by
42 reading this -- this information is also found in your
43 supplemental materials under Tab 2. With approval from
44 Chief Cook I'm just going to read the last part of the
45 resolution.

46

47 It says: Now therefore, be it resolved
48 that the four tribes hereby unanimously support the
49 Craig Tribal Association February 28, 2025 proposal to
50

0662

1 establish differentiated deer harvest limits in Game
2 Management Unit 2 and urge the Federal Subsistence
3 Board to adopt these amendments.

4

5 Thank you, Mr. Chair.

6

7 CHAIRMAN CHRISTIANSON: Thank you. Any
8 tribal or Alaska Native organization testimony.

9

10 MS. LAVINE: Mr. Chair. First in the
11 room is Gloria Burns.

12

13 MS. BURNS: Gloria Burns, Ketchikan
14 Indian Community President. Lifelong resident of
15 Ketchikan. Born and raised. We submitted 05 and the
16 reason why we submitted 05 was long before this newest
17 iteration of attempting to have status as a Federally-
18 qualified user we had had discussions with Craig just
19 -- and we had heard from our relatives on the Island
20 about the hardship that they were having as far as
21 getting deer and there was the proposal that limited
22 initially -- there was a time when Craig was doing a
23 deer celebration, really coming around their deer and
24 they were concerned just about the amount of hunters
25 that were coming from Ketchikan and so they had wanted
26 to limit the amount of -- and there had been a
27 regulation that limited and said that you could hunt a
28 certain amount in Ketchikan, if you got those then you
29 couldn't, in turn, go over to Prince of Wales, and so
30 we were familiar with what that looked like and then we
31 -- when we went and pursued rural status we had the
32 President at the time who was Trixie Bennett, stand up
33 and say, you know, we really feel like the .804
34 analysis is the way to address this and take care of it
35 so we submitted the proposal because Craig approached
36 us and said, you know, you said that you would support
37 us, are you going to support us and so we put that
38 forward. Because we were hearing from people that they
39 were not getting their catch when they went from
40 Ketchikan over to Prince of Wales. And so when you
41 kind of look at the numbers from 2014 to 2023 when you
42 see a 59 percent decrease in Ketchikan hunters going
43 over to Prince of Wales, and then you can alternatively
44 see like a really great bag limit and a faster catching
45 in our own Unit 1 and for us, really, what that meant
46 were the hunters in Ketchikan both tribal and non-
47 tribal were adjusting their hunting practices and going
48 where it makes sense. Right now it's what a buck fifty
49 for, you know, per shot, and so we really had to look
50

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1 at this is the reality. And since there seems to be an
2 unwillingness to deal with the wolf population that the
3 traditional and ecological knowledge of the people on
4 that Island are making a difference, we really have to
5 say that we maintain that the people closest to the
6 resource need to have first access to the resource.
7 And so we put this forward and we respect that OSM has
8 come with a compromise but we really have to rely on
9 the knowledge of the people who are sitting and
10 hunting. We want access to our own land, to hunt the
11 1,500,000 acres in Federal land on our island that
12 nobody's making rules around and nobody's allowing real
13 access to because the State gets to basically do what
14 they want. And we really think that this .804 analysis
15 and we really believe that going ahead and making the
16 changes that Craig had recommended to us is in the best
17 interest of the Federally-qualified user. And while we
18 know it's going to hurt our own tribal citizens and
19 people who have customarily hunted over on Prince of
20 Wales, the reality is people are having a hard time
21 feeding their family and above all else, we're trying
22 to feed our family on our own land and they need to be
23 able to feed their family on their land and if that
24 means that their clan members from Ketchikan who no
25 longer live in Hydaburg, Craig or Klawock can't hunt
26 with them for a little bit well then so be it.
27 Something has to come around and change.

28
29 So we're still in support of our
30 proposal. We're in support regardless of whether
31 anything that's going on and making sure that the
32 people of Klawock, Hiktahunla and Kalisli have the
33 ability to feed their families.

34
35 CHAIRMAN CHRISTIANSON: Thank you,
36 Gloria. Any questions or comments, appreciate that
37 support being a POW resident myself.

38
39 Next testifier Robbin.

40
41 MS. LAVINE: Sorry, I'm sorting through
42 people who have signed up as representatives of tribal
43 organizations and people who have signed up to speak on
44 their own behalf. So I am going to move to next in the
45 que is Clinton Cook. Thank you.

46
47 MR. COOK: Finally. The 100 hour wait.

48
49 (Laughter)

50

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1 MR. COOK: Thank you, Federal
2 Subsistence Members. Board Members. For the
3 opportunity to speak on our vital resource that we rely
4 on. We, as the Craig Tribe, we stand to support the
5 three proposals, 03, 04, 05.

6
7 03 I'd like to speak a bit on as I also
8 sit on the area committee ADF&G out of the Craig area
9 and when we had the local ADF&G employee tell us they
10 sold out of locking tags for non-residents at 300, they
11 didn't know what to do. That puts immense pressure on
12 our resource when you add that amount of people coming
13 to Prince of Wales to harvest our deer. While Proposal
14 04, we're also in agreement that a Section .804 review
15 analysis of our deer should happen. I also attended
16 the Southeast Alaska Regional Advisory Council meeting
17 in Juneau, I don't remember the dates, but we
18 extensively went through the deer issues with the four
19 tribes on the Island represented, Ketchikan was present
20 also to help make sure our harvestable deer was
21 protected, and we appreciate what they do to make sure
22 our rural priority for harvesting animals remains in
23 tact. Wildlife Proposal 05 we also stand in support of
24 that at the Craig Tribal Association. I know the OSM
25 is not going to support or deny but we got to have that
26 .804 analysis to make sure that our priorities are met
27 before any outside qualified users come into our unit.
28 That's the justifications we have.

29
30 And if you refer to your book on Pages
31 520 and 521 you'll see the crash. The more specific
32 crash I'd probably refer to as at the bottom of Page 20
33 where everybody declined, Federally-qualified like
34 myself, non-Federally-qualified urban at large members
35 of Alaska I'm assuming and the average, both in the
36 steep descend since 2000 according to the data
37 presented to us.

38
39 So we stand in support of these
40 proposals.

41
42 Through the Chair, we appreciate the
43 time spent with you and look forward to the next three
44 or four proposals to speak on but we speak in favor of
45 these proposals as presented.

46
47 Thank you.

48
49 CHAIRMAN CHRISTIANSON: Thank you, Mr.
50

0665

1 Cook, appreciate your testimony.

2

3 MS. LAVINE: Next in the que is Aaron
4 Bean.

5

6 MR. BEAN: Good afternoon, Mr. Chair
7 and Members of the Board. My name is Aaron Bean,
8 again, here with the Craig Tribal Association. I'm
9 speaking today on behalf of the Craig Tribal
10 Association, one of the sovereign tribes on Prince of
11 Wales Island and a long time proponent of the measures
12 to conserve Unit 2 deer and protect local subsistence
13 uses. The Craig Tribal Association strongly supports
14 Wildlife Proposals WP26-03 and WP26-04 and urges the
15 Board to adopt the Southeast Alaska Subsistence
16 Regional Advisory Council's recommended modification.
17 We also support the intent of WP26-05 and note that the
18 Council's actions on WP26-03/04 fully address it. We
19 ask the Board to follow the Council's recommendations
20 rather than OSM's limited conclusions.

21

22 Deer are the single most important
23 subsistence resource for our people in Craig, Klawock,
24 Hydaburg, Kasaan and other Prince of Wales Island
25 communities. Our families have relied on deer for food
26 security in our region where store bought proteins are
27 extremely expensive and sometimes unavailable.
28 Traditional ecological knowledge from our elders,
29 hunters and families along with years of public
30 testimony at Council meetings shows a clear and ongoing
31 decline in Unit 2 deer populations since approximately
32 2015. Harvest data confirms this. Unit 2 has not seen
33 a rebound in deer numbers and hunter success that has
34 occurred in other units 1, 2 -- or 1, 3 and 4 after
35 recent mild winters. Local hunters are working harder
36 than ever andstruggling to meet theirsubsistence needs.

37

38 This decline is driven by multiple
39 factors including habitat loss from logging as
40 discussed in the presentation, predation, weather and
41 hunting pressure and competition from non-rural users
42 is a factor which we must control. The recent change
43 making Ketchikan a rural community has added
44 significant new Federally-qualified subsistence users
45 to Unit 2 without corresponding protections for local
46 residents. As you know, our tribe, along with Shaan
47 Seet Incorporated has requested reconsideration for
48 that rural status change precisely because of its
49 impacts on our deer. ANILCA Section .804 requires the
50

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1 Board to prioritize subsistence users based on
2 customary and direct dependent, local residency and
3 availability to alternative resources. The Southeast
4 Council recommendation does exactly that through
5 thoughtful data driven TEK and prioritization.

6
7 I've outlined the table that the RAC
8 went over and we -- I don't want to convolute what is
9 being proposed but for the sake that I can say what the
10 outcomes were, I don't know if that's appropriate
11 because I'm not speaking on behalf of them, but on
12 Table 14 of their meeting packet, non-Federally-
13 qualified users limited to one buck season, starting
14 August 15th through December 31st with Unit 2 closed
15 August 1 through 14. I think during the meeting it was
16 modified to July 24th through August 15th. Federally-
17 qualified subsistence users from Units 1C, 1B, 4 and 5
18 and Ketchikan limited to two bucks season started
19 August 1 through December 31, closed July 24 through
20 the 31st and January 1st through the 31st, no deer
21 harvested. Unit 2 residents retain full opportunity
22 and five deer and one doe October 15 through January
23 31. This framework conserves the deer population,
24 reduces competition and crowding, including
25 roadblocking that our hunters have experienced and
26 ensures the continuation of subsistence uses by people
27 most dependent on the resources, exactly what ANILCA
28 requires. The Council's approach also respects the
29 non-local users still have the opportunity on State
30 lands in other units. Our tribe has been fighting for
31 these protections for years now. Remind everyone of
32 the proposals submitted in 2015, WP16-01 and our
33 continuing ongoing work with the Unit 2 deer.

34
35 The Southeast Council's recommendation
36 is balanced, locally driven solution our communities
37 need at this time. We urge you to defer to the
38 Council, adopt their modification, recommendation and
39 give Prince of Wales, the Island residents a real
40 chance at meeting our subsistence needs while our deer
41 population continues to recover.

42
43 I'd be glad to answer any questions. I
44 did have some additional information and data around
45 wolf and the bear, the black bear, the requirement that
46 you have to have a guide now has put additional
47 pressure, downward pressure on deer, but I'm not going
48 to go into predators today. But that is a contributing
49 factor for the record.

50

0667

1 Thank you.

2

3 CHAIRMAN CHRISTIANSON: Thank you,
4 Aaron, appreciate your testimony.

5

6 (Pause)

7

8 CHAIRMAN CHRISTIANSON: Robbin, do we
9 have anybody else?

10

11 MS. LAVINE: Sorry, Mr. Chair. Mike
12 Jones.

13

14 MR. JONES: Good afternoon, my name is
15 Mike Jones. I am the Tribal President in Kasaan. And
16 now that we're here on the home stretch I really wanted
17 to express how much I appreciate everybody's time and
18 interest and I spent 26 years laying carpet and floors
19 and as grueling as that was physically, I have a new
20 appreciation for the mental capacity it takes to sit in
21 these chairs and to go over all of this testimony and
22 to consider and so I have great respect for all of you
23 and thank you for listening to us.

24

25 I'm pretty brief and I'm here and I'm
26 going to support everything that President Cook and
27 Aaron just shared. On behalf of Kasaan I support WP26-
28 03, 04 and 05 and ask that the Board accept the RAC's
29 recommendation on these.

30

31 That's all I have for you and thank you
32 very much, I really appreciate you guys.

33

34 CHAIRMAN CHRISTIANSON: Thank you,
35 President Jones, appreciate your service.

36

37 MS. LAVINE: Last in the que for tribal
38 Native organization testimony is Leslie Isaacs.

39

40 MR. ISAACS: Thank you. How'aa. I
41 wrote a speech so you're in trouble just to let the
42 Board Chair know. We used to play basketball against
43 each other so I can talk like that.

44

45 (Laughter)

46

47 MR. ISAACS: Thank you. I am the
48 Tribal Administrator for the Hydaburg Cooperative
49 Association and my Tribal President wants me to share
50

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1 that she regrets the fact that a medical trip has kept
2 her from being here to testify on behalf of Hydaburg
3 Cooperative Association. Trust me, she's much better
4 looking than me so you'd enjoy her testimony a lot
5 better. But HCA supports WP26-03, 04 and 05.

6

7

8 And I want to share -- I mean you have
9 a lot of testimony in your book, you have a lot of
10 numbers, you have a lot of scientific knowledge that
11 you rely on with all of the agency reports that you
12 receive. I want to lend a little more of a human story
13 to who we are and what we do.

13

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A few years ago my son, one of my older boys was trapping wolves to help put food on the table and pay the bills and he said, hey, dad, do you want to go with me and, of course, any time your child invites you to go with him and do anything you say yes. Little did I know that guy could walk really fast through the woods and I was literally running trying to keep up with him but we were walking his trapping line and on his trapping line he would say, look at that, they got another one and I was like, okay, what is that, because I've never seen the effects of a wolf on the deer population in my entire life and he said, well, see how all of these bones are scattered all over and the hides spread out about 20 by 20 area and I said, yeah, and he goes, that means the wolves got them and we saw that three times on his trapping line. So not only do you have predator pressure on the deer population, you also have people that are not from our area that show up and harvest deer. We have anecdotal stories of people in Hollis waiting to board the ferry and vehicles in front of them have four and five and six deer piled up with fourwheelers in the back of their truck and you're wondering where your deer are at.

When we don't harvest deer in our area, most notably in Hydaburg and the freezer runs out and it's time to put food on the table and you have to go to the store to buy a piece of meat it's a 45 minute drive, but I know the way your Board Chair drives it's about 28.

(Laughter)

MR. ISAACS: But for me, I drive the road twice a day going to work and going back home to Klawock where the actual grocery store is because I

1 know she'll hear it, my boss, I'll tell her it takes me
2 an hour and a half to drive home, one way. But that's
3 a 45 minute drive, approximately 38 miles, and there's
4 literally 99 turns in that road because my wife counted
5 them because she used to work in Hydaburg as well.
6 It's not a fun drive but yet think about every time you
7 drive to Safeway, Costco, ANP, Three Bears to pick up
8 an onion because your wife said, hey, we're having stir
9 fry and I need an onion, it takes you an hour to go get
10 it and an hour to come home. But then the price of the
11 meat that you're putting on the table is three and four
12 times what you experience here in an urban setting.
13 And now couple that with the high unemployment.
14 Earlier this morning you heard me testify that the
15 unemployment is 28 percent in Hydaburg and when I
16 checked in with my boss she said it's actually higher
17 than that, Leslie, and I said, I know that's why I told
18 them to look at the statistics and who's giving them to
19 you because the unemployment rate in Hydaburg is very,
20 very high. Some have it at almost 50 percent. And so
21 when you're looking at trying to take care of your
22 family you rely on subsistence ways of life, what I
23 would just call our way of life. And as you've heard
24 us talk about when you harvest an animal, a deer, you
25 share it with your family so it's putting food on the
26 table for multiple families and often times these are
27 the families that don't have enough to go to the store
28 and buy meat. Because quite literally if I go to work
29 with less than a half a tank, or less than a quarter of
30 a tank of gas in my truck I don't make it home because
31 there's no gas station in Hydaburg. So I have to
32 actually plan my life around getting back to Klawock to
33 fill up my gas tank in order just to drive to work
34 which is two minutes away because trust me you could
35 get across town in Hydaburg in two minutes, but if I
36 don't make it back to Klawock, if I don't have the
37 resources to fill up my tank to go out hunting and do
38 these things then -- so not only am I looking at a
39 small amount or level of income, but I'm paying \$6 a
40 gallon for gas and I'm burning a quarter of a tank to
41 get to Klawock to fill up my tank.

42

43 So you know I'm saying this and sharing
44 this because this is the reality of who we are and what
45 we do. But we've lived there for thousands and
46 thousands and thousands of years and we're not going to
47 go away. We will find a way to survive. But having
48 access to these resources will make it much easier for
49 us to survive.

50

0670

1 And, so, again, on behalf of Hydaburg
2 Cooperative Association, I want to be very clear that
3 we support the rural -- we support WP26-03, 04 and 05,
4 not that we want to exclude our friends and relatives
5 or anybody outside of the area, it's just we have to
6 find a way to survive where our nanas and our chanas
7 lived so that we can raise our grandchildren on the
8 land that their families come from so with that I'll
9 close.

10

11 Haw'aa.

12

13 CHAIRMAN CHRISTIANSON: Thank you.
14 Thank you for that Scooter -- I mean Leslie.

15

16 (Laughter)

17

18 CHAIRMAN CHRISTIANSON: Basketball
19 name, Scooter.

20

21 (Laughter)

22

23 CHAIRMAN CHRISTIANSON: We used to be
24 way faster.

25

26 (Laughter)

27

28 CHAIRMAN CHRISTIANSON: Does that
29 conclude the tribal Native organization testimony.

30

31 MS. LAVINE: (Nods affirmatively)

32

33 CHAIRMAN CHRISTIANSON: Thank you. We
34 will move on to advisory group testimony, SRC, State
35 Advisory or multiagency group.

36

37 MS. LAVINE: Mr. Chair, we received no
38 comments on these proposals. Thanks.

39

40 CHAIRMAN CHRISTIANSON: Thank you.
41 Public testimony here or online, please raise your hand
42 to be recognized.

43

44 MS. LAVINE: Mr. Chair, next in the que
45 is Ali Ginter.

46

47 MS. GINTER: Good afternoon Members of
48 the Federal Subsistence Board, Mr. Chair, and thank you
49 for the opportunity to speak today. My name is Ali
50

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1 Ginter, I am a resident of Ketchikan, a mother of four
2 and I serve my communities in several roles including
3 as a Councilwoman for Ketchikan Indian Community. I am
4 here speaking on my own behalf and on behalf of my
5 family.

6
7 Wudi Hani Yeil is my Tlingit name. I
8 am Tlingit of the Kaachadi Clan, originally from
9 Wrangell, and I'm also a child of the Tahltan people.

10
11 I am speaking today regarding WP26-05,
12 04 and 03 and the proposed approach to address Unit 2
13 deer concerns through a Section .804 prioritization
14 analysis and harvest limitations. I want to be clear I
15 support this proposal and I believe this is the legally
16 appropriate avenue for addressing concerns about deer
17 availability. Families in Craig and across Prince of
18 Wales Island have voiced real concerns about declining
19 deer numbers and access to an important subsistence
20 resource. Those concerns deserve thoughtful action.
21 At the same time families in Ketchikan also rely on
22 subsistence resources to feed our households. For my
23 family of six, salmon, whitefish and deer are not
24 recreation they are meals, food security and part of
25 how we provide for our children. That is why I
26 appreciate this proposal, it focuses on the actual
27 issue being raised, allocation and harvest pressure
28 rather than attempting to strip rural status from an
29 entire community. Revoking Ketchikan's rural status
30 would not solve conservation concerns, it would only
31 harm families who depend on subsistence and create
32 unnecessary division between Southeast communities as
33 Ketchikan residents who are able to get their first two
34 deers of the season in Unit 2 even prior to receiving
35 rural status.

36
37 This proposal is the better path
38 because it addresses management concerns directly
39 through the tools available to the Board while still
40 recognizing that multiple rural communities rely on
41 these resources as ANILCA clarifies.

42
43 I also want to note that many families
44 like mine are not seeking to spend significant money
45 traveling to Prince of Wales Island to hunt deer.
46 Ferry fares, fuel, lodging, time away from work and
47 transport costs often defeat the purpose of
48 subsistence. Most working families are simply trying
49 to utilize law, opportunities -- lawful opportunities
50

0672

1 and practical ways to feed their households.
2 Subsistence should never become a contest of one rural
3 community versus another. We all understand what it
4 means to stretch resources, care for family and depend
5 on the land and waters around us.

6
7 I respectfully ask the Board to support
8 solutions like WP26-05, 04, and 03 that address the
9 real management issues without punishing unrelated
10 families or reopening rural status battles that only
11 deepen division.

12
13 Thank you for considering a balanced
14 and constructive path forward.

15
16 Gunalcheesh.

17
18 CHAIRMAN CHRISTIANSON: Thank you.
19 Thank you for your testimony, appreciate it.

20
21 MS. GINTER: Thank you.

22
23 MS. LAVINE: Next in the room is Becker
24 -- sorry Spencer Beckham.

25
26 CHAIRMAN CHRISTIANSON: He's fine, he
27 shook it off. No, he's fine, he gave me the no que.

28
29 MS. LAVINE: Okay. Then we will go
30 online to Jessica Cox, Jessica unmute your line and
31 address the Board.

32
33 MS. COX: Hi everyone. Thank you for
34 the opportunity to allow me to testify publicly. My
35 name is Jessica Cox. My grandparents were James Slinco
36 of Klawock and my grandmother was Frankie Douville
37 Slinco from Craig. This is difficult because I'm
38 speaking a lot against my family but I'm also speaking
39 for my family here on Prince of Wales. I'm currently a
40 resident of Prince of Wales Island but I'm also a
41 tribal member of Ketchikan Indian Community and I would
42 like to support these proposals as they are written
43 without modification.

44
45 Yesterday in public testimony it was
46 said that Ketchikan and their grocery stores suffer
47 when barges do not come in because of bad weather. I
48 think that speaks in and for itself. When Ketchikan
49 suffers the outlying communities suffer far more
50

1 greatly. Ketchikan has several grocery stores, two
2 which are national chains and two that are Alaskan
3 chains, outlying communities, like Prince of Wales, we
4 don't have that, and food sources here are a struggle
5 on a good day, with good weather. Ketchikan has
6 multiple -- I grew up going back and forth between
7 Ketchikan and Prince of Wales Island, I understand, you
8 know, what it means to live in both of these places and
9 I have a lot of love and respect for Ketchikan and
10 Prince of Wales Island. Because of that I felt the
11 responsibility to stand up today and speak about the
12 real consequences that Prince of Wales Island are
13 experiencing because of the overhunting over here.
14 With Ketchikan getting rural status I see that the
15 impacts were felt almost immediately. The IFA was full
16 every day, hunting pressure increased dramatically.
17 During the morning commute to Craig you would see
18 hunters leaving the night hunts almost on a daily
19 basis. There would be deer carcasses frequently left
20 on the side of the road with only the hamstrings and
21 the backstraps removed. And I stopped and I spoke with
22 a lot of these hunters because you can't go anywhere
23 out there during hunting season where they're not
24 already. I would get up at 4:00 or 5:00 o'clock in the
25 morning, go out hunting, and they were already there.
26 And surprisingly it's a lot of these people that aren't
27 from the Native, you know, community, it's not against
28 the Native community whatsoever. The non-Native
29 community in Ketchikan is absolutely culturally
30 connected to these food sources, that is a fact and
31 that connection is important and it's valid, but it's
32 also true that they don't rely on these resources to
33 feed their families in the same way that the residents
34 on Prince of Wales Island do. For many of these
35 families, you know, this food is essential, it's not
36 supplemental. Like Tribal Administrator Isaacs said,
37 you know, we're not able to just go down to the grocery
38 store, you know, without a 43 mile drive, instead we're
39 out in the bay trying to catch fish because we can't
40 afford to go on that drive every day.

41
42 I guess my final thoughts here are it
43 might sound like just more hunting and fishing but when
44 resources are limited, the challenges are going to be
45 felt by the Prince of Wales residents, they're going to
46 be the ones that feel the negative impacts, not
47 Ketchikan.

48
49 Thank you.
50

0674

1 CHAIRMAN CHRISTIANSON: Thank you for
2 your testimony and calling in today. I appreciate that
3 perspective from both places.

4
5 MS. LAVINE: Next in the que is
6 Madeline Demaske.

7
8 MS. DEMASKE: Thank you, Mr. Chair and
9 Members of the Federal Subsistence Board. Good
10 afternoon. For the record my name is Madeline Demaske
11 and I am speaking on behalf of Safari Club
12 International.

13
14 We strongly oppose Wildlife Proposals
15 26-03 and 26-05 which shut down or restrict blacktail
16 deer hunting by non-Federally-qualified users on
17 Federal public lands in Game Management Unit 2. Not
18 only do these proposals lack Office of Subsistence
19 Management support -- sorry, it's been a long day --
20 but they run counter to the directives set out in the
21 Alaska National Interest Lands Conservation Act.

22
23 The Federal Subsistence Board may only
24 close areas to non-Federally-qualified users to
25 conserve deer populations or for the continuation of
26 subsistence use. Neither closure criterion is met
27 here. SCI fully understands and supports ANILCA's
28 directive to prioritize subsistence use opportunity,
29 however, ANILCA also preserves rights of non-
30 subsistence hunters to share in hunting opportunities
31 on public lands where the resource is healthy. The
32 status of Sitka blacktail deer in GMU 2 do not require
33 that non-subsistence hunting be restricted to protect
34 the subsistence priority. Given the dense habitat of
35 the Island, abundant surveys are difficult but deer
36 pellet surveys provide an index of the deer population
37 and do not indicate any conservation concerns. Harvest
38 by non-Federally-qualified users is also strictly
39 regulated to avoid any negative impacts on either the
40 status of deer or subsistence use. Non-Federally-
41 qualified users are restricted to a lower bag limit and
42 a shorter season than Federally-qualified users.
43 Federally-qualified users are also permitted to hunt
44 does and are afforded the longest deer season in Alaska
45 which extends from July 24th to January 31st. There
46 are more opportunities afforded to Federally-qualified
47 users in Game Management Unit 2 than any other hunting
48 area in Alaska.

49
50

1 Unsurprisingly non-Federally-qualified
2 users make up only four percent of overall harvest in
3 Unit 2 with less than one percent harvesting two or
4 more deer. Considering the small proportion of non-
5 Federally-qualified users that harvest two or more deer
6 restricting them to one buck would prevent
7 approximately 18 bucks from being harvested annually
8 because relatively few deer are harvested by non-
9 Federally-qualified users closing Unit 2 to them is not
10 necessary for the continued subsistence use of
11 Federally-qualified users. Nor do the proponent (break
12 in line) either of these arguments.

13
14 The proponents of Wildlife Proposal 26-
15 03 state that the proposal is primarily intended to
16 address competition among users. Competition is not an
17 enumerated reason for restriction of non-subsistence
18 uses under Section .815.

19
20 I hope to quickly address U.S. Fish and
21 Wildlife Regional Director Boario's question during
22 discussion of WP26-31 regarding Ninilchik.

23
24 In Ninilchik Traditional Council versus
25 United States, the Ninth Circuit affirmed in part and
26 reversed in part the Federal Subsistence Board's
27 decision to impose a spike fork/50-inch restriction on
28 subsistence use of moose in Unit 15. The Ninilchik
29 Traditional Council argued this restriction violated
30 ANILCA subsistence priority. However, the Court
31 rejected that argument that the absolute priority must
32 be accorded to the subsistence use of fish and wildlife
33 and upheld this Board's interpretation of the term,
34 priority, to allow, and I quote: The balancing of the
35 competing aims of subsistence use, conservation and
36 recreation while at the same time providing subsistence
37 hunters with a meaningful use preference. They also
38 stated -- the Ninth Circuit also stated: ANILCA
39 provides for a number of important purposes all of
40 which must be balanced by the Secretary of the
41 Interior. Subsistence living, although at the heart of
42 ANILCA is not a per se preemptive statutory priority.
43 The Ninth Circuit's decision in Ninilchik has been
44 interpreted to mean that although ANILCA emphasizes the
45 importance of subsistence lifestyles, its other goals
46 include the preservation of other opportunities for
47 hunting. Allowing subsistence harvest and non-
48 subsistence harvest inherently results in some measure
49 of competition.
50

0676

1 There are several examples of the Board
2 rejecting similar proposals to the ones before you now.

3
4 For example, in January of 2023, this
5 Board rejected three proposals that would have closed
6 deer hunting to non-Federally-qualified users in
7 Southeast Alaska. Each proposal stated perceived
8 competition as the reason for requesting closure.
9 Again, this Board rejected each proposal for failing to
10 meet the criteria set forth in ANILCA.

11
12 Accordingly, a closure or restriction
13 to non-Federally-qualified users would not be necessary
14 to ensure the continued viability of a healthy Sitka
15 blacktail deer population in Unit 2, nor is it
16 necessary to protect the subsistence priority
17 opportunity.

18
19 SCI respectfully urges this Board to
20 reject Wildlife Proposals 26-03 and 05 because they
21 fail to satisfy ANILCA.

22
23 Thank you for the opportunity to
24 comment on these proposals.

25
26 CHAIRMAN CHRISTIANSON: Thank you,
27 appreciate your testimony. Anybody else in the queue.

28
29 MS. LAVINE: (Shakes head negatively)

30
31 CHAIRMAN CHRISTIANSON: Okay. That
32 concludes the public testimony on this. Council
33 recommendation.

34
35 MR. HERNANDEZ: Thank you, Mr. Chair.
36 Don Hernandez for the Southeast RAC. First of all I
37 might start off by saying that, you know, the Council
38 reviewed a number of proposals that all related towards
39 this .804 determination including the proposals from
40 Ketchikan Indian Community, .803, we had our own and
41 .804 and .805, we also included deliberations on
42 Proposals 06 and 07, which you haven't mentioned but
43 all of those proposals were considered in our
44 determination on this rural prioritization. And our
45 final recommendation is on Page 493 in your books in
46 the form of a table, which actually makes it a lot
47 easier to follow than what I'm going to read. I guess
48 I also just want to preface by saying that in our
49 recommendations, which I would strongly recommend that
50

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1 you follow, where we considered all of these different
2 proposals and balanced them, differs somewhat from, you
3 know, what other people have suggested and it differs
4 from what the OSM's suggested modification is but we
5 considered all of those and I really think we came up
6 with the best balance. I just want to put that out
7 there.

8
9 Also just to maybe summarize before I
10 read through all the details here, it's important to
11 note that nothing will change in this determination for
12 hunters in Unit 2. Hunters from Ketchikan actually
13 will have a slight benefit from what they've had prior
14 to this determination and then other communities, and
15 as you get further away, like the communities in Unit 3
16 remain very close to the same, very slight reduction
17 from what they had and the further you get away, like
18 Units 4, 5, 1D, they're taking a little bit more of a
19 restriction and then, of course, considering all of
20 those we have to have more of a restriction on non-
21 Federally-qualified than any Federally-qualified user
22 has so that's kind of a synopsis of what we did.

23
24 Okay.

25
26 So maybe I'll start out, part of our
27 deliberation was on Proposal WP26-03 and that's where
28 the Council voted to support with a modification to
29 close all of Unit 2 from July 24th to August 15th to
30 deer hunting by non-Federally-qualified users and
31 reduce the harvest limit for non-Federally-qualified
32 users to one buck. The original proposal was to
33 eliminate all non-Federally-qualified users and we
34 modified that to allow them one buck with a shortened
35 season.

36
37 Okay.

38
39 And then Wildlife Proposal 26-04, the
40 Council also voted to support that with a modification.
41 This proposal was to conduct the ANILCA .804 analysis
42 for deer in Unit 2 prioritizing harvest limit and
43 season length. The Council recommended to close all of
44 Unit 2 from July 24th to July 31st and from January 1st
45 to January 31st to deer hunting, Federally-qualified
46 users from Units 1C, 1D, 4, 5 and Ketchikan and limit
47 harvest by these Federally-qualified subsistence users
48 to two bucks and to close all of Unit 2 from January
49 1st to January 31st to deer hunting by Federally-
50

1 qualified subsistence users from Units 3, 1B, and the
2 remainder of Unit 1A, which include Metlakatla and
3 Saxman and limit harvest by these Federally-qualified
4 subsistence users to four bucks. Like I say reading
5 through it it sounds complicated but if you look at the
6 graphic you'll see it's a lot easier to follow.

7
8 For Wildlife Proposal 26-05, the
9 Council took no action on that because we included that
10 into our all around determination on the .804.

11
12 So our justification and rationale for
13 the action that we took, Southeast Council felt that
14 harvest and season restrictions for non-Federally-
15 qualified users and Federally-qualified subsistence
16 users residing outside of Unit 2 were justified due to
17 the reports of declining deer populations and the
18 difficulties many Unit 2 residents have been
19 experienced in harvesting sufficient deer to meet their
20 subsistence needs. These difficulties are due to low
21 deer abundance as well as crowding which can lead to
22 interference of hunting by other user groups. The
23 Council pointed to public testimony and the OSM
24 analysis citing substantial increases in deer hunter
25 numbers in Unit 2 since 1997 as well as severe habitat
26 loss due to logging which has significantly reduced
27 deer carrying capacity. The Council felt that a one
28 buck harvest limit would be sufficient for non-
29 Federally-qualified users given this situation because
30 it would provide continued harvest opportunity, avoid
31 unnecessary restrictions and would not greatly limit
32 economic opportunities for Prince of Wales Island
33 businesses that cater to non-local hunters. The
34 Council also noted that there are additional
35 opportunities for non-Federally-qualified users to
36 harvest deer under State regulations on non-Federal
37 lands in Unit 2 and they stated restricting non-
38 Federally-qualified users was necessary given their
39 recommended restrictions on Federally-qualified
40 subsistence users via the .804 prioritization process.

41
42 Southeast Council carefully considered
43 their recommendations on ANILCA Section .804
44 restrictions by evaluating the customary and direct
45 dependence of each eligible rural community on Unit 2
46 deer as a mainstay of livelihood, local residency and
47 proximity of each community to Unit 2 deer and the
48 availability of alternative resources in each
49 community.
50

1 The Council determined that residents
2 of Units 1C, 1D, 4 and 5 do not traditionally show a
3 high level of use for dependency on Unit 2 deer and
4 have access to sufficient alternative resources. It
5 was also noted that Unit 3 residents exhibit historic
6 dependence on Unit 2 for deer harvest and a lack of
7 alternative resources in part because Unit 3 has a low
8 deer harvest limit, which is only two bucks, and the
9 shortest deer season in the region which runs from
10 August 1st only through the end of November. The
11 Council also considered average community income and
12 employment indicators for evaluating the availability
13 of alternative resources when determining restrictions
14 to Ketchikan versus nearby Unit 1A communities of
15 Saxman and Metlakatla. They noted that Saxman has a
16 relatively high poverty levels compared to Ketchikan.
17 The Council also noted that the Ketchikan Indian
18 Community recognized the need for restrictions in order
19 to conserve Unit 2 deer and ensure the continuation of
20 Unit 2 residents subsistence uses of deer. KIC was
21 supportive of the Council's proposed regulations.

22
23 The Southeast Council recognized that
24 doe harvest is fairly limited in Unit 2, but that
25 harvest of doe harvest is a customary and traditional
26 practice for many residents of Unit 2, providing an
27 additional opportunity for Federally-qualified
28 subsistence users there to meet their subsistence
29 needs. The Council voted to retain this doe harvest
30 opportunity for Unit 2 residents, Unit 2 residents only
31 while eliminating doe harvest for Federally-qualified
32 subsistence users residing outside of Unit 2 to reduce
33 potential impacts to the deer population. The January
34 deer season was also retained for Unit 2 residents only
35 for the same reasons. Testimony on Wildlife Proposal
36 WP26-03,04 and 05 highlighted the high cost and limited
37 amount of store bought food available on Prince of
38 Wales Island and that many rural residents depend on
39 securing their own protein through hunting and fishing.

40
41 The Councils actions on these proposals
42 took this into consideration and made recommendations
43 to restrict users based on the necessity to address
44 conservation concerns for Unit 2 deer and to continue
45 the subsistence uses of deer by rural residents of
46 Prince of Wales Island. So given this, the Council
47 took no action on WP26-05 due to our including that in
48 the determination of the subsistence priority.

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1 So be glad to answer any questions.

2

3

CHAIRMAN CHRISTIANSON: I'd just like
4 to say I appreciate the work you did, you know, living
5 in the region and then knowing that the analyst -- that
6 you guys got to get the .804 and then look at it and
7 work through that process and really tease out some of
8 the bigger issues. It's kind of reassuring as well as
9 we seen both testifiers today speaking in favor of
10 this, being from both communities and user groups, that
11 they found the compromise that you found in your thing
12 and I would strongly encourage the Board to really
13 weigh that as we make that decision today as we really
14 have to value the work that you guys do in the region
15 and having that firsthand account of the users and long
16 history of doing Unit 2 stuff there, Don. I was
17 looking at the map, it's still the same map from my
18 subcommittee work that I did with you guys back in '06,
19 I imagine before I was even a Board member so it's cool
20 to see that that's still in there.

21

22

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MR. HERNANDEZ: Yeah, thank you,
Chairman Christianson. Yes, Tony and I worked together
on a subcommittee that was formed by the Council, I
think that was actually like 2004, it was like 22 years
ago now where we came up with a lot of these
recommendations that are still in practice at this
time. So that's when Tony and I first met. Okay,
questions.

MR. INGERSOLL: Mr. Chair. I want to
honor the amazing work that was done by the Council and
by all of the tribal governments engaged here.
Governments that didn't agree with each other about
some of the aspects of the Ketchikan Rural
Determination and still came together with the Council
to craft a solution together. That speaks to an
amazing degree of leadership on the part of all of the
tribal governments and members of the Council. I do
think that there's a typo on the table, at least what
I'm reading in the text is that the Council proposes to
close to non-Federally-qualified users from July 24th
to August 15th [sic] but in the table it says
restricted from August 1st to August 14th. I think the
correct answer, it's restricted from July 24th to
August 14th but correct me.

MR. HERNANDEZ: Yes, you could probably
be correct in that, I guess, depending on how you look

0681

1 at it. Only Federally-qualified users had that one day
2 season open in July, the non-Federally-qualified, I
3 think in regulation probably was listed as closing from
4 the 1st to the 15th because prior to granting that
5 additional opportunity for Federally-qualified
6 subsistence users of that initial, that early season,
7 the non-Federally-qualified regulation was August 1st
8 to the 15th so that kind of remains the same I think.

9

10 MR. INGERSOLL: Okay. I just wanted to
11 make sure that the text above matched the table.
12 Because the text on Page 493 it says support WP26-03
13 with modification to close all of Unit 2 from July 24th
14 to August 15th and then below in the table it says --
15 it has a different date. Either one is fine, I just
16 want to know which one it is.

17

18 MR. HERNANDEZ: Yeah, there might be a
19 little bit of a discrepancy there but the season for
20 non-Federally-qualified users does not open until
21 August 15th.

22

23 MR. INGERSOLL: Okay, I understand now,
24 I think.

25

26 MR. HERNANDEZ: I think that's right.

27

28 MR. INGERSOLL: Okay.

29

30 MR. HERNANDEZ: You can either view
31 that as a two week closure or a three week closure,
32 depending on how you want to see that.

33

34 MR. INGERSOLL: Sorry for my confusion,
35 thank you, I understand now.

36

37 MR. HERNANDEZ: Yeah.

38

39 CHAIRMAN CHRISTIANSON: Did that answer
40 your question Jerry?

41

42 MR. INGERSOLL: Yes, sir, thank you.

43

44 CHAIRMAN CHRISTIANSON: Thank you.
45 Okay, just making sure. This is also the opportunity,
46 any other questions for the RAC on their
47 recommendation.

48

49 (No comments)

50

0682

1 CHAIRMAN CHRISTIANSON: Thank you.
2 We'll move on to the Department of Fish and Game.

3
4 MR. MULLIGAN: Thank you, Mr. Chair.
5 For the record, Alaska Department of Fish and Game
6 opposes the suite of proposals as we don't see them
7 necessary under Title VIII of ANILCA for the
8 conservation of deer populations in Unit 2 or for the
9 continuation of subsistence uses. Currently, as you
10 heard, in the OSM analysis there is significant
11 opportunity for season and also bag limit for Unit --
12 for Federally-qualified users are opposed to non-
13 Federally-qualified users.

14
15 One thing I would like to point out
16 that I feel is necessary is on Page 519, you'll look at
17 that graph of harvest and our harvest objective. Now,
18 to be specific the harvest objective that's in that
19 graph is for our intensive management objectives, that
20 is not for what -- or ANS, ANS is 1,500 to 1,600, which
21 we have met every year except '23 since regulatory year
22 '97. I just wanted to point that out. So that's for
23 sustainability, that's not for subsistence needs,
24 that's when we start looking at what we would need to
25 do possibly for intensive management of that population
26 to bring it back, not a conservation concern or a
27 harvest concern for folks meeting their subsistence needs.

28
29 You know as we look at the deer
30 population in Unit 2, levels of harvest, as I said,
31 it's remained stable since regulatory year and we've
32 met that ANS, the CPUE, catch per unit effort for deer
33 has maintained -- has been static for that amount of
34 time and if you're looking for, you know, just parsing
35 it out, you know, restricting this non-resident harvest
36 only makes up roughly 4.3 percent and restricting the
37 harvest you're only going to get a couple dozen bucks
38 out of that closure. And as already has been
39 mentioned, you know, that non-Federally-qualified users
40 can already -- well, possibly still hunt on non-Federal
41 lands, there's not much on the island but it will be
42 there, but then also below ordinary high water is still
43 a harvest opportunity for them as well. Not directly
44 pertaining to our position on these proposals but just
45 to let you know is that I know the blacktail foundation
46 still has Forest Service money, they are raring to use
47 on the Island to help rebound populations of the deer
48 by doing some habitat work. I'm sure Member Ingersoll
49 knows all about that and I talked to them quite
50

0683

1 frequently and they seem to be working with us and with
2 the Forest Service, you know, often, to try to get that
3 money being implemented. I think it's burning a hole
4 in their pocket and they would really like to get that
5 going.

6
7 But just overall, Fish and Game opposes
8 these. We don't feel it's necessary at this time.

9
10 Thank you, Mr. Chair.

11
12 CHAIRMAN CHRISTIANSON: Thank you, Ben.
13 And thank you for that statement. Go ahead, Jerry.

14
15 MR. INGERSOLL: Yeah, and thank you.
16 We are working with the deer foundations and we
17 appreciate the partnership and support. Thank you.

18
19 CHAIRMAN CHRISTIANSON: Yeah, I've seen
20 those little partnerships work wonders in just creating
21 corridors, like I mean it's just drastic improvement as
22 far as allowing to get through that stem exclusion
23 zones, you know, just to get them from the top to the
24 bottom, they just weren't coming down because they
25 couldn't get around and when they did a little bit of
26 that habitat adjustment stuff we seen deer start to be
27 able to get through those stem excluded areas and it
28 improved a little bit on ANCSA land, right, but still
29 that's our battle, I guess, because tribal citizens is
30 that the State lands are managed ANCSA lands and we
31 have a large private land holding too in the area which
32 is funny that, sometimes law enforcement's parked at
33 the end of our own private land holding waiting on the
34 24th to see if we're on State land or Federal land and
35 it's still one of those things we see out there, that
36 there is the ability to compromise our user group
37 because on our own land we can criminalize ourself on
38 the 24th. Just for the record, you know, you could put
39 that out there. Because we try to avoid that here but
40 it happens and it's a reality and we see them sitting
41 there. So that's the kind of thing that we see.

42
43 Go ahead, Ben.

44
45 MR. MULLIGAN: Just a plug because
46 something that hit my mind when I do have conversations
47 with them is, you know, part of what they're going to
48 be doing is pulling out some of that stem exclusion
49 stage so non-traditional woody debris that needs to
50

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1 find a market, so if anybody on the Island has some
2 ingenuity and some creativity and can think of a market
3 to utilize those materials, that would help those guys
4 out because I think that's part of what's hampering
5 their ability to do that right now and it'll come out.
6 So if someone wants to utilize it'll be there but I
7 know that was kind of a place where they had some
8 contention in doing that, is like, well, is that going
9 to be marketable and can we move forward with it if
10 it's not. So it's going to be there for the taking if
11 someone can figure out a way to utilize it.

12

13 CHAIRMAN CHRISTIANSON: Thank you.
14 We're looking for all the tools to help our landscape
15 improve.

16

17 ISC.

18

19 MS. LAVINE: Thank you, Mr. Chair. The
20 full ISC comment is in your meeting materials.

21

22 The Federal Subsistence Board will need
23 to consider a few key sections of ANILCA before taking
24 action on proposals requesting closures and closure
25 reviews. Specifically those actions pertaining to
26 Council deference, Section .805(c) and those pertaining
27 to limitations to closures or restrictions of
28 subsistence and non-subsistence uses on Federal public
29 lands in Sections .815(3) and .816(b). These three
30 sections speak to the heart of Board authority and
31 require a careful balance between the Federal priority,
32 the continuation of subsistence uses, the necessary
33 conservation of subsistence fish and wildlife and
34 unnecessary restrictions.

35

36 Thank you, Mr. Chair.

37

38 CHAIRMAN CHRISTIANSON: Thank you,
39 Robbin. That opens up the floor for Board discussion.
40 Any other pointed questions for Council Chair or State
41 reps, this is your opportunity to ask further
42 questions.

43

44 (No comments)

45

46 CHAIRMAN CHRISTIANSON: Hearing and
47 seeing none, we'll open up the floor for Board action.

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49 MR. INGERSOLL: Mr. Chair.

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1 CHAIRMAN CHRISTIANSON: Yes.

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MR. INGERSOLL: Forest Service moves to adopt the WP26-03 and 04 with the -- as recommended by the Southeast Council and as reflected in the table on Page 493 and as previously displayed here. With the Board's permission I won't try to read it all there but it was on the screen and it's on Page 493. If I get a second I'll go into my rationale.

MS. BOARIO: Fish and Wildlife Service seconds.

MR. INGERSOLL: Thank you. In deference to the Southeast Council and with full acknowledgement and honor of the work that they did to complete a Section .804 analysis in a really restricted timeframe and engage in dialogue and consultation with all of the affected tribal governments they have completed a tiered analysis that balances subsistence priority, conservation of the resource and providing that without fully closing to non-Federally-qualified users. That's a pretty impressive allocation of a restricted and somewhat declining resource. Not a question of competition per se, but a question of allocation of resource to the people who need it most for food.

We believe that the harvest limits and season dates derived from the Section .804 analysis divides this resource fairly between the Federally-qualified subsistence users and provides -- still provides an opportunity for non-Federally-qualified users. It's a limited resource and we need to allocate it fairly among the people who need it most.

Thank you.

CHAIRMAN CHRISTIANSON: Thank you for that motion. The floor is open for deliberation, discussion.

MR. PENDERGAST: Mr. Chair.

CHAIRMAN CHRISTIANSON: Yes.

MR. PENDERGAST: Just a question. Kevin with BLM. So the motion includes both WP26-03 and 26-04 to adopt, not any action on 26-05, correct?

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1 MR. INGERSOLL: That's correct. It's
2 fully reflected on the screen in front of us and on
3 Page 493.

4
5 MR. PENDERGAST: And if a Board Member,
6 you know, there's two proposals linked up now in the
7 motion.

8
9 MR. INGERSOLL: I believe these are
10 connected and so it is one motion, to adopt WP26-03 and
11 WP26-04 as modified by the Southeast Council.

12
13 CHAIRMAN CHRISTIANSON: Any other
14 questions, clarification, discussion.

15
16 (No comments)

17
18 CHAIRMAN CHRISTIANSON: Please read
19 into the record and roll call.

20
21 MS. LEONETTI: The motion is to adopt
22 Wildlife Proposal 26-03 and Wildlife Proposal 26-04,
23 both as modified by the Southeast Alaska Regional
24 Advisory Council and take no action on Wildlife
25 Proposal 26-05.

26
27 Forest Service Member Ingersoll.

28
29 MR. INGERSOLL: Support.

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

33
34 MR. STRIKER: Park Service supports the
35 motion in deference to the RACs. Excellent compromise
36 proposal. And for the reasons summarized by Regional
37 Forester Ingersoll.

38
39 MS. LEONETTI: BLM Member Pendergast.

40
41 MR. PENDERGAST: BLM is unable to
42 support the motion with both moving together and given
43 the complexity of the issue trying to untangle that, I
44 think, is not going to be advisable. But just given
45 the -- given the closure is already codified in
46 regulation, you know, there's some concerns on my end
47 with 26-03 so at this time I'll just oppose the motion.
48 Thank you.

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1 MS. LEONETTI: Public Member Payenna.

2

3 MR. PAYENNA: Public Member Payenna
4 supports and noting the incredible amount of work that
5 was conducted by the RAC and in agreement with comments
6 made by Jerry.

7

8 MS. LEONETTI: Public Member Woods.

9

10 MR. WOODS: Public Member Woods
11 supports Wildlife Proposal 26-03 and Wildlife Proposal
12 26-04 as modified by Southeast Council and take no
13 action on Wildlife Proposal 26-05 for the reasons set
14 forth, not only in the OSM summary but all the
15 information passed on. I'd like to -- I'm trying to
16 address the Forestry's [sic] comment that we are not
17 actually closing, we have addressed a lot of problems,
18 supports seasons, limits, time, area, species, gender
19 and limiting the conflicts that are going on in this
20 region. It is huge. So I appreciate all the work that
21 went into this and, yeah, I support the proposals I
22 just listed. Thank you.

23

24 MS. LEONETTI: Public Member Oney.

25

26 MR. ONEY: Public Member Ray Oney is in
27 support of WP26-03 and WP26-04 as modified by SERAC and
28 take no action on WP26-05.

29

30 MS. LEONETTI: BIA Member John.

31

32 MS. JOHN: BIA votes to adopt WP26-03
33 and 04 as modified by the Southeast RAC and take no
34 action on 05, which supports the Forest Service's
35 motion. The Council worked extensively and very
36 impressively on these proposals and developed
37 recommendations that addresses the needs of Unit 2
38 residents by giving them the highest priority for
39 harvesting deer on Prince of Wales Island. Their
40 modifications also enable rural users from Units 1A, 1B
41 and 3A to maintain their subsistence practices, plus
42 provide opportunity for qualified users from the rest
43 of Unit 1 to be accorded a subsistence priority that is
44 in line with their current harvests. The RAC's
45 recommendation will allow sporthunters to continue
46 taking a deer in parts of Unit 2. We concur with the
47 justifications of the Council on their recommendations
48 and commend them for their diligent efforts on this
49 complex matter. Quyana.

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1 MS. LEONETTI: Fish and Wildlife
2 Service Member Boario.

3
4 MS. BOARIO: Fish and Wildlife Service
5 votes to support in deference to the Southeast Regional
6 Advisory Council and because of the justification by
7 the Forest Service. In light of testimony heard today
8 there is a need to provide subsistence opportunity for
9 people of Prince of Wales Island and continue
10 subsistence uses. The recommendations provide for
11 harvest limits and seasons for Federally-qualified
12 subsistence users, non-Federally-qualified users and
13 non-prioritize (indiscernible). As outlined in the OSM
14 analysis, the recent reductions in the number of deer
15 harvest per year by both Federally-qualified
16 subsistence users and non-Federally-qualified users and
17 the increasing time required to harvest by both user
18 groups suggests that the Unit 2 deer population likely
19 has declined, the population is less accessible and/or
20 competition levels are impacting harvest success and
21 efficiency. For these reasons we support the
22 modifications presented by the Southeast Council to the
23 Board and thank everyone for their great work on this
24 as well.

25
26 MS. LEONETTI: Public Member Pitka.

27
28 MS. PITKA: Sorry, I was a little bit
29 preoccupied with that fan going up there, it's -- I
30 swear it's going to ruin all of our weekend.

31
32 I vote to support WP26-03/04 and take
33 no action on WP26-05 in deference to the Southeast
34 Regional Advisory Council as justified by the Forest
35 Service and BIA. Thank you.

36
37 MS. LEONETTI: Chair Christianson.

38
39 CHAIRMAN CHRISTIANSON: I support in
40 deference to the RAC and all the work that they've done
41 and also like to commerate -- commerate -- commend the
42 guys that worked together, both, you know, Ketchikan
43 and Prince of Wales, in putting forward proposals that
44 alleviated concerns so that we seen them back here
45 promised on the mic and back here trying to set the
46 numbers according -- so, me, being a long time user
47 completely support what I see on the Board, I think
48 it's reflective and still inclusive of all user groups
49 and is in line with the data that you see of what is
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1 harvested and reported on by those users. So I really
2 like that Southeast did that, it basically followed the
3 current use so not really restrictive in any way but
4 just kind of recognizing what shakes out out there. So
5 appreciate that and keeping it open for those other
6 user groups, our culture is to share, not to just take,
7 but in the times of conservation all the factors that
8 are weighed and discussed here today really do take
9 place there and, you know, the other people we had
10 here, things develop fast, we're watching Prince of
11 Wales explode in development in the last couple of
12 years and so this can help maybe just keep our needs
13 met on the Island as far as food security goes. You
14 heard the wildlife issues and other issues that
15 complicate our harvest and so we just appreciate that
16 the Board here supports the rural resident on Prince of
17 Wales Island and has come up with a really decent
18 compromise for all groups, so, thank you.

19

20 MS. LEONETTI: Mr. Chair, the motion
21 carries nine to one.

22

23 (Applause)

24

25 CHAIRMAN CHRISTIANSON: Thank you guys.
26 Good job Staff at OSM. And with that, Ashley, I'm
27 going to ask you to step up here and say something.

28

29 MS. BULWERK: I was just getting ready
30 for whenever you're ready for the next one.

31

32 CHAIRMAN CHRISTIANSON: Well, Ashley, I
33 got a question here because just considering what
34 happened, the next few proposals look to change
35 regulation on what we just adopted. So for me I would
36 see us just walking through something that was going to
37 change what we're doing and what we just passed, almost
38 unanimously, as a Board, so I would almost suggest that
39 -- and if the Board doesn't see it that way, speak up,
40 but that we maybe take no action on the rest of the
41 agenda items dealing with Unit 2 deer because we just
42 set the regulation and I'd like to see that work if
43 that's okay and I get concurrence here, that we get a
44 motion by the Board to take no action on the rest of
45 the Unit 2 deer proposals based on the recent Board
46 action we just decided on.

47

48 MR. INGERSOLL: So moved.

49

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1 CHAIRMAN CHRISTIANSON: Motion's been
2 made.

3
4 MR. INGERSOLL: Okay.

5
6 CHAIRMAN CHRISTIANSON: We got a motion
7 to take.....

8
9 REPORTER: Who seconded?

10
11 CHAIRMAN CHRISTIANSON: Forest Service
12 made the motion, who made a second. Frank made the
13 second.

14
15 MR. WOODS: (Nods affirmatively)

16
17 REPORTER: Thank you.

18
19 CHAIRMAN CHRISTIANSON: There's a
20 motion to take no action on the remaining Unit 2 deer
21 proposals, can you read them into the record and then
22 we'll take a vote on it. Thank you.

23
24 MS. LEONETTI: I just want to confirm
25 with Ashley that I know which proposals those are.

26
27 MS. BULWERK: Absolutely. That's going
28 to be WP26-06, 07, 08 and the Wildlife Closure Review,
29 which is 01, WCR26-01.

30
31 MS. LEONETTI: Okay. So we have a
32 motion on the floor to take no action on Wildlife
33 Proposals 26-06/07, Wildlife Proposal 26-08, and
34 Wildlife Closure Review 26-01. And we'll do a roll
35 call.

36
37 Forest Service Member Ingersoll.

38
39 MR. INGERSOLL: Support.

40
41 MS. LEONETTI: Public Member Pitka.

42
43 MS. PITKA: Support.

44
45 MS. LEONETTI: Fish and Wildlife
46 Service Member Boario -- oh, I'll come back to her.

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48 BIA Member John.

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MS. JOHN: BIA supports.

MS. LEONETTI: Public Member Oney.

MR. ONEY: Public Member Ray Oney
supports.

MS. LEONETTI: Public Member Woods.

MR. WOODS: Public Member Woods
supports.

MS. LEONETTI: Public Member Payenna.

MR. PAYENNA: I support.

MS. LEONETTI: BLM Member Pendergast.

MR. PENDERGAST: Support.

MS. LEONETTI: Park Service Member
Striker.

MR. STRIKER: Support.

MS. LEONETTI: Fish and Wildlife
Service Member Klein.

MS. KLEIN: Support.

MS. LEONETTI: Chair Christianson.

CHAIRMAN CHRISTIANSON: I support.

MS. LEONETTI: Mr. Chair, the motion
carries unanimously.

CHAIRMAN CHRISTIANSON: Thank you.
Let's take a five minutes, since we just saved a few
minutes on the record. Thank you, Don and Southeast
for your good work.

(Off record)

(On record)

CHAIRMAN CHRISTIANSON: We'll get back
to the order of business.

0692

1 (Pause)

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CHAIRMAN CHRISTIANSON: Were you going to switch to your order of business or is this it, you're ready.

MS. BULWERK: I'm ready, Mr. Chair.

CHAIRMAN CHRISTIANSON: Okay.

MS. BULWERK: I think Rob's sorting out the slides for you all right now.

CHAIRMAN CHRISTIANSON: Thank you.

MS. BULWERK: All right. So we're going to go ahead to WCR26-02. For the record my name is Ashley Bulwerk, I'm a subsistence biologist for the Forest Service on the Tongass National Forest. Federal Wildlife Closure Review 26-02 can be found on Page 703 of your meeting book and it's a standard review of the closure of the Federal public lands in Unit 5A East of the Dangerous River from September 16th to the 30th and West of the Dangerous River from October 8th to the 21st for the harvest of moose by non-Federally-qualified users.

For these hunts, only residents of Unit 5A, which encompasses the community of Yakutat are considered Federally-qualified subsistence users, neither of these closures impact the Nunatak Bench area. A map of Unit 5A can be found on Page 705. The annual harvest quotas for the moose hunts in Unit 5A are set in partnership with the Alaska Department of Fish and Game and once the quotas are hit, the hunts are closed using special actions within the season. Since 2017 the quota for Unit 5A East and West has been 30 bull moose each. No population surveys have been conducted since 2020 and data surveys are hard to compare and condition dependent. In Unit 5A West, each year from 2012 to 2025 the moose hunt has been closed for the season prior to the end of the Federal closure which indicates that only Federally-qualified subsistence users were allowed to harvest in this hunt. In Unit 5A East, which is farther from Yakutat and harder to access, from 2012 to 2024 the moose hunt had never been closed prior to the end of the Federal closure and had only been closed prior to the end of the season once. However, in 2025 Unit 5A East closed

1 before the end of the season, but not before the end of
2 the Federal closure.

3
4 The moose harvest closure has now been
5 met twice since 2012 in that section. An annual
6 average harvest was 21 moose. From 2018 to 2024 the
7 proportion of moose harvested by Federally-qualified
8 subsistence users that took place in Unit 5A East
9 during the Federal closure ranged from zero to 50
10 percent, averaging 39 percent.

11
12 The OSM conclusion is to modify the
13 closure. To rescind the closure in Unit 5A East and
14 retain the status quo for the closure in Unit 5A West
15 and to replace the regulatory language that says:
16 except by residents of Unit 5A with except by
17 Federally-qualified subsistence users. Federally-
18 qualified subsistence users account for 100 percent of
19 the moose harvested in Units 5A West in most years as
20 this moose population is closely managed by harvest
21 quotas and these quotas are quickly met in Unit 5A West
22 usually before the end of the Federal closure to non-
23 Federally-qualified users. Maintaining the closure in
24 5A West is necessary for the continuation of
25 subsistence uses of moose as mandated by Title VIII of
26 ANILCA. In Unit 5A East Federally-qualified
27 subsistence users accounted for 43 percent of the moose
28 harvest from 2012 to 2024. In recent years, 2021 to
29 2024, 16 percent of the overall moose harvest from 5A
30 East has taken place during the September closure
31 window, which equates to two to four moose each year.
32 Modifying the closure to rescind the closure in Unit 5A
33 East may eliminate an unnecessary restriction on non-
34 Federally-qualified users as little Federally-qualified
35 subsistence use harvest occurs within the current Unit
36 5A East closure dates and in most years the moose
37 harvest quota for Unit 5A East is not met. The
38 majority of moose harvest by all user groups in 5A East
39 occurs outside of the closure dates, additionally the
40 State moose season in Unit 5A East does not open until
41 after the Federal closure ends.

42
43 Therefore, as the Federal Subsistence
44 Board's policy states that Federal public lands and
45 waters should be reopened as soon as practicable once
46 the conditions that originally justified the closure
47 have changed to such an extent that the closure is no
48 longer necessary, keeping a closure in Unit 5A East
49 during a time with no competing uses is counter to the
50

1 Board's closure policy and Section .815 of ANILCA.

2

3

4 Lastly, the suggested language
5 modification for the Unite 5A moose regulations to
6 change the language that says: residents of Unit 5A to
7 Federally-qualified subsistence users is consistent
8 with other Federal wildlife closures and does not alter
9 the current C&T of this closure. The current
10 regulatory language just implies that there's an .804
11 restriction in a place rather than a limited C&T
12 determination.

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Thank you, Mr. Chair. I can take questions from the Board at this time.

CHAIRMAN CHRISTIANSON: Thank you, Ash. Any questions from the Board on this proposal.

(No comments)

CHAIRMAN CHRISTIANSON: Hearing and seeing none, was there any written public comment.

MS. BULWERK: Yes, Mr. Chair, there were 23 public comments submitted during the open public comment window. They can be found in Tab 4 of your supplemental materials. All but one of the comments generally supported maintaining both of these closures, although several indicated that East of the Dangerous River is available for non-locals to hunt moose. The final comment explicitly noted that the West closure was necessary but did not mention the East closure.

CHAIRMAN CHRISTIANSON: Thank you. Summary of tribal government and ANCSA consultation.

MR. LIND: Thank you, Mr. Chair. There were one support and one opposed to WCR26-02.

(Pause)

MR. LIND: Hang on.

(Pause)

MR. LIND: Forgive me, Mr. Chair. The Yakutat President, during the August consultation was in support and the Sealaska was the one opposing.

0695

1 Thank you, Mr. Chair.

2

3 CHAIRMAN CHRISTIANSON: Thank you. And
4 we might want to check for clarification on that
5 because I think Sealaska supported the community.

6

7 MS. GREDIAGIN: Mr. Chair. We received
8 a written comment from Sealaska Heritage on this and I
9 don't know if you guys wanted to hear that whole thing
10 read, similar to the AC and SRC comments but we did
11 receive that from the Sealaska Heritage to retain the
12 status quo.

13

14 CHAIRMAN CHRISTIANSON: Okay, yeah,
15 that sounds appropriate, I didn't think it was
16 opposition. I just remembered seeing that. Thank you.

17

18

19 MS. LAVINE: And, yes, Mr. Chair. Any
20 of the letters from tribes or tribal resolutions should
21 be under Tab 2 of your supplemental material binder.

22

23 CHAIRMAN CHRISTIANSON: Thank you. So
24 let the record reflect. Tribal Alaska Native
25 organization testimony here or online.

26

27 MS. LAVINE: We have Cynthia Petersen
28 online. Cynthia.

29

30 MS. PETERSEN: Hi, good evening. Thank
31 you for this opportunity to speak tonight. I am sorry
32 I am not there in person, I did have to leave, I had
33 other things obligated here back in Yakutat that I
34 needed to attend to. I currently serve as the
35 President of the Yakutat Tlingit Tribe and I'm here on
36 behalf of our tribe. I want to speak specifically to
37 Wildlife Closure Review, WCR26-02.

38

39 The Yakutat Tlingit Tribe supports
40 WCR26-02 -- lost connection.

41

42 MS. LAVINE: Cynthia.

43

44 MS. PETERSEN: Yes, I'm sorry, I lost
45 connection, I had to go to a better connection, can you
46 hear me now?

47

48 MS. LAVINE: Yes.

49

50

1 MS. PETERSEN: Okay, sorry about that.
2 So I want to speak on behalf of WCR26-02. The Yakutat
3 Tlingit Tribe supports retaining the status quo across
4 Unit 5A. I want to also state that September is not
5 just another season on the calendar for Yakutat, it's a
6 critical window for moose harvest for our community.
7 In Yakutat access is very limited, weather conditions
8 change very quickly. We do not have extensive road
9 systems. Harvest windows are narrow and once the
10 opportunity passes it can't be recreated.

11
12 Even modest increases in non-local
13 hunting pressure during peak periods can have
14 disproportionate affects in remote communities like
15 ours. For rural residents this is not about
16 recreation, it's about winter food security. It's
17 about making sure that our elders have food in their
18 freezers to last them through the winter. That our
19 children have food on their tables for breakfast, lunch
20 and dinner as our school cannot provide a lunch program
21 for our students.

22
23 We recognize that this is described as
24 a standard review, but the impacts to our community is
25 not standard. The rural subsistence priority under
26 ANILCA requires more than biological sustainability, it
27 requires meaningful opportunity for Federally-qualified
28 users.

29
30 The Southeast Alaska Subsistence
31 Regional Advisory Council recommends retaining the
32 status quo. 23 public comments also supported
33 retaining the closure. We urge the Board to give
34 substantial weight to those recommendations and to the
35 lived experience of the communities most directly
36 affected, which is Yakutat.

37
38 Beyond this specific proposal I want to
39 speak briefly about the capacity. In remote areas like
40 Yakutat we see several gaps in Federal enforcement
41 presence, monitoring and maintenance of subsistence
42 access routes. Continuing resolution from staffing
43 instability have real impacts on the ground. When
44 roads, trails and access points are not maintained that
45 directly affects subsistence opportunity. At the same
46 time we also want to be clear we support this Federal
47 Subsistence Management System and do not support a --
48 acquiesce to the State management. Federal management
49 better upholds the rural priority and provides a more
50

1 appropriate framework for tribal engagement. However,
2 where Federal capacity is limited, tribal governments
3 should be empowered as partners and stewardship. The
4 Yakutat Tlingit Tribe is ready and capable of assisting
5 with this such as on the ground monitoring, harvest
6 reporting, education and compliance presence,
7 maintenance partnerships in key subsistence areas. We
8 are already demonstrating this through co-management
9 partnerships with the U.S. Forest Service at places
10 like Strawberry Point and Heinke Island. When tribes
11 are directly engaged, stewardship improves, compliance
12 improves and traditional knowledge is incorporated into
13 management decisions.

14

15 In closing, we respectfully urge the
16 Board to retain the current closure under WCR26-02 and
17 affirm the Federal government's trust responsibility to
18 protect the rural subsistence priority.

19

20 Subsistence is not theoretical, it's
21 our daily life, it's our way of life and how we survive
22 here in Yakutat. The decisions made here determine
23 whether our families can continue to put traditional
24 foods on the table. Subsistence is not a privilege for
25 our people, it is a Federally-protected priority and we
26 ask that you uphold it accordingly.

27

28 Gunalcheesh. Thank you for your time.

29

30 CHAIRMAN CHRISTIANSON: Thank you.
31 Thank you for the time to call in and testify today,
32 appreciate that. That concludes our tribal Native
33 organization testimony. Next we have Advisory
34 group.....

35

36 MS. LAVINE: You received no comments.

37

38 CHAIRMAN CHRISTIANSON: No comments for
39 that. Public testimony online or here raise your hand.
40 We have one in the back. Matt, you have the floor.

41

42 MR. ANDERSTROM: Good afternoon and
43 thank you for the opportunity to speak. My name is
44 Matt Anderstrom, I serve as the Yakutat Tlingit Tribe
45 Food Sovereignty Coordinator. I'm the President of ANB
46 Camp 13, Yakutat AC member, Wrangell-St. Elias SRC
47 member and a Federally-qualified subsistence user from
48 Yakutat.

49

50

1 I'm here to express strong opposition
2 to Proposal WCR26-02 and support maintaining status
3 quo. I'm also the father of five children. Four of
4 them 18 and under and my youngest is 2 months old.
5 I've hunted in this area for about 35 years and I've
6 taught my older children how to hunt here as well.
7 This is not just where we gather food, it's where
8 knowledge and traditions are passed on. Our community
9 moose hunting, it's not a recreational activity, it's
10 essential to our food security, our culture and our way
11 of life. Yakutat is a remote community with a high
12 cost of living and limited access to affordable food.
13 This year alone we've experienced two barge
14 cancellations that disrupted food deliveries and
15 reduced store availability. In those moments
16 subsistence hunting is not optional, it is critical.
17 The current Federal subsistence priority ensures that
18 local residents who depend on this resource have a
19 meaningful opportunity to harvest close to home.
20 Removing that priority would increase competition on a
21 limited moose population and reduce that opportunity
22 for those who rely on it the most.

23
24 We're already seeing increased pressure
25 on this resource. In the most recent season, Unit 5A
26 closed earlier than expected, reflecting a noticeable
27 increase in hunting activity in that area. Local
28 observations indicate that this increase coincides with
29 a new air taxi service that is flying hunters in to the
30 area and promoting access. At the same time the U.S.
31 Forest Service rental cabins were fully booked prior to
32 the start of the season limiting access for local
33 residents who rely on those cabins for subsistence
34 hunting. Unit 5A East is the primary road access
35 hunting area for local residents reached by crossing
36 the Dangerous River. This makes it one of the few
37 areas where families without resources for boats or
38 aircraft can reasonably hunt. Increased competition in
39 this area directly reduces access and opportunity for
40 local subsistence users. Additionally, local hunters
41 are reporting a noticeable increase in wolf activity
42 with wolves being observed regularly in that area.
43 This adds further concern about pressure on the moose
44 population and long-term sustainability. There are
45 also gaps in recent population data for both moose and
46 wolves in this area. Making decisions that reduce
47 subsistence opportunity without complete information
48 raises concern. The Yakutat Tlingit Tribe has the
49 personnel and the capacity to assist with population
50

0699

1 monitoring and we are willing to be a part of that
2 effort moving forward. Traveling further to hunt is
3 not a realistic options for many households due to the
4 high cost of fuel, time and equipment.

5

6 If local harvest opportunities are
7 reduced, some families will not be able to replace that
8 food source. This proposal raises concerns regarding
9 ANILCA's requirement to provide a priority for rural
10 subsistence users and to ensure opportunity for our
11 customary and traditional uses. Removing that priority
12 in this context undermines those protections.

13

14 I respectfully urge the Board to reject
15 Proposal WCR26-02 and to uphold the Federally-qualified
16 subsistence priority in Yakutat and maintain the status
17 quo.

18

19 Thank you.

20

21 CHAIRMAN CHRISTIANSON: Thank you,
22 Matt. Any questions from the Board for Matt.

23

24 (No comments)

25

26 CHAIRMAN CHRISTIANSON: Thank you, and
27 appreciate Yakutat and the cultural camp there this
28 summer. It was wonderful to get to know the community
29 and see that they truly do an extraordinarily
30 subsistence lifestyle there being rural and limited.
31 Thank you.

32

33 MS. LAVINE: Next in the queue is Sasha
34 Anderstrom.

35

36 MS. ANDERSTROM: Hi, can you hear me.

37

38 CHAIRMAN CHRISTIANSON: Yes, you have
39 the floor.

40

41 MS. ANDERSTROM: My name is Sasha
42 Anderstrom, I'm from Yakutat, Alaska. I am the ANS
43 Camp 13 First Vice President and also on the Tlingit
44 and Haida Community Council here and I am also ANS
45 Grand Camp Sergeant at Arms. I'm here talking on
46 behalf of myself today in support of maintaining the
47 status quo in Unit 5A for moose hunting.

48

49 The RAC Board, you know, they support

50

0700

1 maintaining the status quo as well. Fish and Game has
2 not done any wildlife studies in the area since 2020
3 and so they haven't been able to verify, you know, if
4 we have an issue with our population or not, especially
5 with the wolf issues that we've had here, you know,
6 climate changes, we've got the water table rising in
7 our fields, which also adds to making it harder for our
8 hunters to get to the moose, they have to go farther
9 out, it becomes more expensive.

10

11 You know on the East side where OSM has
12 recommended that we change it, this is -- you know,
13 they mentioned that there's only maybe two to four
14 moose harvested by the Federally-qualified subsistence
15 users in that area. Four moose make a big difference
16 for our community, that can feed a lot of people. And
17 when we have somebody flying in hunters, when they did
18 that this last season, they closed our season very
19 quickly. And when they can do that starting at the
20 same time as the, you know, Federally-qualified guys,
21 they may not be able to get anything. That's taking
22 the opportunity from them and then they're going to be
23 potentially fighting for those same 30 moose on the
24 West side that, you know, 60 other guys are already
25 fighting for and there's only 30 total. There's no
26 complete closure there to non-qualified users, we're
27 just giving everybody that's a Federally-qualified
28 subsistence user a shot, you know, what's four moose to
29 them, it's nothing but it's everything to us here.

30

31 So I guess that's all I have today.

32

33 CHAIRMAN CHRISTIANSON: Thank you.
34 Thank you for taking your time to call in and testify.
35 Any other.

36

37 MS. LAVINE: (Shakes head negatively)

38

39 CHAIRMAN CHRISTIANSON: Thank you.
40 That concludes our public testimony. Council
41 recommendation on this.

42

43 MR. HERNANDEZ: Thank you, Mr.
44 Chairman. Don Hernandez for the Southeast RAC. Our
45 Council voted to retain status quo on this closure
46 review for the harvest of moose by non-Federally-
47 qualified users on Federal public lands in Unit 5A from
48 September 16th to September 30th East of the Dangerous
49 River and from October 8th to October 21st on the West

50

1 side of the Dangerous River.

2

3

4 The Council heard significant tribal
5 and public testimony supported by local knowledge
6 regarding the use and importance of moose hunting for
7 local Federally-qualified subsistence users in both
8 Unit 5A West and Unit 5A East. This testimony
9 emphasized the need to maintain the closures in both
10 areas to help Federally-qualified subsistence users
11 meet their needs for moose in an area where the price
12 of store bought foods can be prohibitive and hunting
13 competition from non-local users has been increasing.
14 Council members and testifiers noted that air taxi
15 services have recently expanded into areas historically
16 relied upon by local families and they expected non-
17 local competition for moose to continue and increase in
18 the area as a result.

18

19

20 Though Federally-qualified subsistence
21 users typically utilize the moose hunt in the more
22 easily accessible Unit 5A West, testifiers noted that
23 there are portions of Unit 5A East that are relatively
24 accessible without a plane and these areas are a very
25 important safety net for local hunters who are unable
26 to harvest a moose within Unit 5A West. Further,
27 testifiers voiced concerns over the lack of recent
28 population surveys for Unit 5A moose explaining that
29 locals had difficulty finding enough moose to meet
30 their harvest quota in the previous season due to a
31 significant increase in the population of wolves in the
32 area. The Council also explained that while a Federal
33 closure of Unit 5A East does not currently overlap with
34 the State moose season in this area, there was no
35 guarantee that the Board of Game would not expand the
36 dates of that hunt in the future and if this were to
37 happen it would be likely that better equipped non-
38 local hunters would largely out compete local hunters
39 for moose in this area.

39

40

41 So the Council stated that their
42 support coincides with the considerable public and
43 tribal testimony that was in support of retaining this
44 closure to ensure much needed access to the resource by
45 Federally-qualified subsistence users. Local TEK
46 supports the need for this closure. Local residents
47 consider there to be a conservation concern especially
48 in light of recent increases of non-Federally-qualified
49 users in the region. Retaining this closure will be
50 beneficial to subsistence users. The Council felt that

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0702

1 this closure would not unnecessarily restrict non-
2 Federally-qualified subsistence users.

3
4 And just maybe a little bit more on
5 that.

6
7 We did hear a lot of testimony on this
8 wildlife closure as I guess we hear on all wildlife
9 closures, you know, from the local users and I think I
10 would have to say that the Council was very influenced
11 by that testimony. You know, we felt that the local
12 knowledge that we heard of just how -- especially in
13 relation to this East of the Dangerous River, was
14 really a lot more informative than anything we could
15 gather from, you know, the statistics and published
16 information. It was just -- it was really detailed and
17 valuable information to the Council. So I just wanted
18 to make that note.

19
20 CHAIRMAN CHRISTIANSON: Thank you, Don.
21 Any questions for the RAC Chair.

22
23 (No comments)

24
25 CHAIRMAN CHRISTIANSON: Hearing and
26 seeing none, Alaska Department of Fish and Game.

27
28 MR. MULLIGAN: Thank you, Mr. Chair.
29 For the record, the Alaska Department of Fish and Game
30 supports the OSM modification to only lift the closure
31 in the portion of 5A. As you've heard from the OSM
32 analysis, we rarely see the harvest objective being met
33 in that area. Even if you do lift the closure there
34 are still an additional two weeks on the front end
35 where the State season does not start and also if you
36 do choose to lift that portion, no additional harvest
37 will go beyond the quota that we're already
38 establishing under our registration permits. So it'll
39 stay sustainable because it's not a harvest ticket,
40 it's a registration, we establish that quota and in
41 that -- in that area we have a three day reporting
42 requirement so we keep tabs on that fairly quickly as
43 folks are coming out of the field and believe that we
44 can manage that without overharvesting.

45
46 Thank you.

47
48 CHAIRMAN CHRISTIANSON: Thank you, Ben.
49 Question.

50

0703

1 MR. INGERSOLL: Yeah, question for you.
2 My understanding is the State season doesn't begin
3 until October 1st, is that correct?

4
5 MR. MULLIGAN: That is correct, Member
6 Ingersoll.

7
8 MR. INGERSOLL: And the current Federal
9 closure is from September 16th to September 30th, so
10 rescinding that closure, would that affect non-
11 Federally-qualified users?

12
13 MR. MULLIGAN: I guess I'm -- let's --
14 I'm getting -- I'm confused on what exactly you're
15 asking?

16
17 MR. INGERSOLL: The closure doesn't
18 coincide with the State season so I guess I'm a little
19 confused as to how rescinding the closure would create
20 this extra use?

21
22 MR. MULLIGAN: Well, it's still -- I
23 mean it doesn't overall of the season but part of the
24 season so you would have folks able to come in during a
25 portion of that because it's an October 1st through
26 November 15th and I believe the closure currently is --
27 oh, that's true.

28
29 MR. INGERSOLL: See, I don't think that
30 the closure actually overlaps with the season.

31
32 MR. MULLIGAN: No. Sorry, I stand
33 corrected, sir.

34
35 MR. INGERSOLL: Thank you.

36
37 MR. WOODS: Mr. Chair. I concur with
38 the Forestry Department, that maybe it's -- so my
39 understanding is you have a State hunter, registration
40 permit number 50 or whatever it is, and then that
41 season is open until closed?

42
43 MR. MULLIGAN: Member Woods. No, we
44 have a set -- it's not -- may be announced or until
45 closed. In our regulations it's October 1st to
46 November 15th. But if we hit that quota before the end
47 of the stated season length we have to close before the
48 November 15th end date no matter.

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0704

1 MR. WOODS: Okay.

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MR. MULLIGAN: So we could possibly go to the end of the season stated in our regulations but if we hit the quota we would close before that date?

MR. WOODS: No, thank you for that clarification and also the quota would help stir [sic] my decision. Thank you.

CHAIRMAN CHRISTIANSON: ISC.

MS. LAVINE: Thank you, Mr. Chair. The Federal Subsistence Board will need to consider a few key sections of ANILCA before taking action on proposals requesting closures and closure reviews. Specifically those sections that speak to the heart of Board authority and require a careful balance between the Federal priority, the continuation of subsistence uses; the necessary conservation of subsistence fish and wildlife and unnecessary restrictions.

The ISC acknowledges the Council's comments and tribal members testimonies both containing local knowledge and observations that provide valuable insights. The evidence presented suggests that there continues to be conservation concerns for moose in Unit 5A West and though the increase of fly-in hunting observed in 2025 by non-Federally-qualified users has not yet resulted in conservation concerns for moose or significantly impacted the continuation of subsistence users of moose in Unit 5A East, Federally-qualified subsistence users are concerned that it may eventually reduce moose numbers in Unit 5A East to the point that subsistence uses will be negatively impacted. The ISC suggests the Council's recommendation to retain a closure in Unit 5A East may not meet the criteria for deference.

Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you, Robbin. This is our opportunity for Board discussion with the Council Chair and Liaison.

(No comments)

CHAIRMAN CHRISTIANSON: Open the floor for Board action. Jolene, you have the floor.

0705

1 MS. JOHN: Jolene, BIA. I did have a
2 question, was curious after hearing the reports and
3 wanted to ask Southeast Chair, Don, if you received any
4 evidence or testimony from the tribal members or the
5 area users, if their -- through the increased
6 sporthunters that are arriving, if it's affecting
7 already the subsistence user's ability to harvest
8 moose?

9
10 MR. HERNANDEZ: I would say, yes, that
11 was kind of the focus of a lot of the testimony and,
12 yeah, there were a number of factors that they told us
13 about and, you know, the increase in -- recent increase
14 in fly-in hunting, which is kind of hard for locals to
15 compete with because they can't afford, you know, that
16 kind of expense to go out and hunt and, you know, they
17 also depend on using some Forest Service cabins in the
18 vicinity that get booked up like -- I think the
19 characterization was that, you know, you can book a
20 cabin I think on like January 1st or something and
21 quite often these cabins will all be reserved like
22 within a matter of minutes; things like that. And it
23 just kind of makes it hard to compete with, I guess, is
24 the proper term, so, yes.

25
26 MR. PENDERGAST: Mr. Chair. Not a part
27 of the world I'm intimately familiar with so trying to
28 understand the facts on the ground. This is Kevin with
29 BLM. Current closure in 5A East is September 16th to
30 September 30th, and maybe this is a question to the
31 Council, but, who is that closed to, the State hunt
32 doesn't open until October 1st? So I mean I appreciate
33 and acknowledge the passion around the issue but I
34 think it's also important we separate fact from
35 perception here as far as the actual dates.

36
37 MR. HERNANDEZ: So there's two areas in
38 question here, the East side of the Dangerous and the
39 West side of the Dangerous River and I think they got
40 different closures you have to look at closely. I
41 think the one that's most in contention is East of the
42 Dangerous River which is further away from Yakutat. I
43 think most people are agreeing to retain that closure
44 and on the West closer to Yakutat. So on the East
45 side, on the State regulations it does say October 1st
46 is the opening and then you go back -- where is that
47 one -- where is the East side mentioned -- yeah.

48
49 MR. PENDERGAST: It's late in the day
50

0706

1 to be doing calendar math, I apologize.

2

3

MR. HERNANDEZ: Yeah, I know.

4

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MR. PENDERGAST: But, I mean, your question, Jerry, got me thinking. I think it's possible -- actually I think there is no -- effectively no closure in place in 5A East.

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MR. INGERSOLL: My understanding is that the current Federal closure in 5A East is during a period that the State hunt is open so the current closure in 5A East does not close anything to anybody who could legally hunt and rescinding it would have no impact on anybody, and, that's said with all respect to the care that people have over who's using the resource and when but I think there may be a misunderstanding of what is currently closed and for whom.

20

21

22

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MR. PENDERGAST: And I think that's right. And I'm getting up to speed along with the rest of the body here on this, but, that would seem to me to be an important point in this discussion.

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MR. WOODS: A simple.....

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CHAIRMAN CHRISTIANSON: One second, Frank. Ben wanted to be recognized and then Frank.

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CHAIRMAN CHRISTIANSON: Is there a Federal opportunity at this time -- there is a Federal opportunity so that's, I think, what we're getting at.

MS. LEONETTI: Lisa Grediagin has an answer.

0707

1 CHAIRMAN CHRISTIANSON: So Frank next
2 and then we'll call on Lisa.

3
4 MR. WOODS: No, I just need some
5 clarification on the comment of time, because it's open
6 until closed, the way I read it, and then a quota
7 system, the motion that we're going to pass will
8 clarify that language, at least in my brain, that after
9 the quota is met then we have 5A East would be open
10 until closed, right, and that would be a biological --
11 biologist decision, when it gets up to 25, 30, right,
12 so at that point we -- we utilize that same quota in
13 our area for certain areas so as soon as we get to the
14 threshold cut it off and it doesn't -- then it's
15 closed, right, your biologist has the discretion to --
16 when it gets close to that 30 permits and that quota
17 system, at least the biologist has the option to close
18 the season. So, thank you.

19
20 CHAIRMAN CHRISTIANSON: Okay, I got a
21 closure going on upstairs.

22
23 (Laughter)

24
25 CHAIRMAN CHRISTIANSON: I'm sorry.

26
27 MR. PENDERGAST: Well, you know, I'll
28 just observe, for the record Kevin with BLM, that I
29 think the fact of the matter is that there is no
30 closure in place as a practical matter of fact in 5A
31 East presently and in 5A West there's a one week -- one
32 week at the beginning of the State season that is
33 closed, that's the overlap there.

34
35 MS. GREDIAGIN: Thank you, Mr. Chair.
36 This is Lisa Grediagin. And, yeah, I was just hoping
37 to add a little bit of clarity to this question. And
38 so this closure has been in regulation since 1991.
39 It's gone through alot of iterations on changing
40 dates, dividing hunt areas. And so in 2018 the Board
41 adopted the current closure dates of the September 16th
42 to 30th in Unit 5A East and then that same year, later
43 in 2018, the Yakutat AC had submitted a proposal to the
44 Board of Game and then the Board of Game adopted a
45 season date of starting at October 1st. And so this
46 current iteration of this closure has been in
47 regulation since 2018. And I think just through this
48 last closure review is when OSM kind of realized that
49 difference in State dates versus Federal closure dates.
50

0708

1 But I also wanted to just make the Board aware that
2 this is not the only Federal closure where a State hunt
3 is closed. You guys just voted to retain status quo on
4 WCR26-18 for sheep in Unit 23 and that was due to
5 severe conservation concerns for the sheep population
6 even though the State hunt has been closed since 2014.
7 And so it's definitely something to consider but I
8 think this question on whether Federal closures during
9 times -- you know, and another example is just what you
10 did on the Unit 2 deer hunt where in regulation now it
11 will say, Federal public lands are closed to non-
12 Federally-qualified users from July 24th to August 15th
13 even though the State hunt doesn't open until August
14 1st, you know, but we're still closing that time in
15 July to non-Federally-qualified users when the State
16 hunt is closed.

17
18 And so I understand the Council's and
19 the users concerns that if this closure is lifted then
20 it opens up the possibility of a State hunt whereas now
21 I don't know if anyone is going to try to submit a
22 proposal to open up a State hunt but hopefully that
23 explains a little bit of the regulatory history on how
24 this came to be, a little context on -- this isn't
25 unprecedented to have a closure to non-Federally-
26 qualified users when the State hunt is closed.

27
28 Thanks.

29
30 MR. PENDERGAST: This is Kevin with
31 BLM. Then I need to ask you what you think the
32 biological purpose of such a closure would be if
33 there's no open hunt?

34
35 MS. GREDIAGIN: I mean speaking from
36 OSM's perspective we supported rescinding this closure
37 because harvest quotas were not being met and as far as
38 retaining it when the State hunt is closed -- I mean I
39 guess I'd have to think more about that because I think
40 OSM was focused more on the quotas not being met and
41 then getting more input from the Councils and the
42 users, which we've heard pretty extensively on how
43 important this hunt is to them and so I think --
44 frankly I was reviewing the OSM justification that we
45 needed to get more input from the Southeast Council on
46 this and I think we just failed to update our
47 justification after that. But I think after all the
48 testimony we heard from the Yakutat residents and
49 tribal representatives it's pretty clear this is an
50

0709

1 extremely important hunt for them.

2

3 I'm sorry, that maybe didn't directly
4 answer your question.

5

6 MR. PENDERGAST: No, that's fair. I'm
7 not trying to put you on the spot, I'm just trying to
8 formulate my own thinking around the issue. Thank you.

9

10 MS. JOHN: Yeah, Mr. Chairman. This is
11 going back to my earlier question and then reading this
12 here. To maintain closure in both areas to help
13 subsistence users meet their needs for moose and then
14 air taxi service have recently expanded into the area,
15 certainly would help this Board to have some kind of
16 evidence that sportshunting is now affecting the
17 ability of the subsistence users to harvest moose in
18 order to justify maintaining the closure. I was hoping
19 that the Council could speak to that then maybe
20 something we need to consider trying to solidify here.

21

22 MR. HERNANDEZ: I'm sorry, Jolene, I
23 was reading through the regs here trying to make sense
24 of this. What was that question again?

25

26 MS. JOHN: I guess my main point is at
27 some point it would be great if we could have some sort
28 of evidence that subsistence users ability to hunt
29 moose is being impacted by the increasing number of air
30 taxi clients in order for us to really justify a
31 closure in the future.

32

33 MR. HERNANDEZ: Okay. I would say that
34 right now that's just anecdotal information, it would
35 probably take some other kinds of investigations to
36 quantify that, I guess, yeah. Something that might
37 come out in the future though, yes.

38

39 MS. JOHN: Thank you.

40

41 MR. WOODS: So Mr. Chair, maybe for the
42 RAC. Good work, a lot of work, the dates aren't
43 important for me, but modify -- so OSM conclusion is to
44 modify the closure -- rescind the closure for Unit 5A
45 that has a 30 quota number, we keep it open, we want to
46 open it up until that number gets set and it would be
47 closed after -- whenever the biologist agrees, okay,
48 we're close enough and whether we put dates on it it
49 could be a Board modified proposal to set those numbers

50

0710

1 and dates and it would just clarify a passing of this
2 Council, we're doing our due diligence to open or
3 rescind a closure with a hard number, date or no date.
4 Good catch Forestry.

5

6 There's nothing in writing right now.

7

8 There's nothing in writing right now
9 that clarifies in my mind how we're supposed to manage
10 and regulate that hunt other than the State's RM061,
11 which isn't clear enough for me, it's beyond them
12 dates. The second part is if we open it, it's going to
13 be opened until closed, when you hit that 30 number and
14 we're already doing that anyways, so I don't know maybe
15 it's missed communication.

16

17 CHAIRMAN CHRISTIANSON: Frank, I think
18 it isn't opened until the 1st anyway. So we're talking
19 about a window that's closed and there is no hunting
20 during that time, there is no open date, not Federally
21 and not by the State so that's kind of why we're saying
22 that it's kind of a moot subject but, you know, I could
23 also see the concerns of the local residents there,
24 right, what we're hearing in testimony but as far as
25 the opportunity. I guess the only fear would be that
26 the State opened it up earlier or something but that
27 would have to go through the wildlife proposal process
28 and a public process and someone would have to be the
29 champion of all that stuff, which, I don't think is the
30 intent here and I'm not hearing that and it's managed
31 by quota and a tight restricted window by the State,
32 not the Federal Board. So I was just.....

33

34 MR. MULLIGAN: You got it Mr. Chair. I
35 mean we don't -- it's not opened until closed, I mean
36 Member Woods, that October to November timeframe is
37 set. The quota applies there. And that changes based
38 off of our adaptive management strategy of looking at
39 the population. So for the State in 5A East October
40 1st, that season opens for non- -- under State
41 regulations, which could be Federally-qualified or non-
42 Federally-qualified and if we do hit that quota before
43 the November 15th we will shorten that season, if we
44 don't hit it and we go all the way to November 15th,
45 regardless of whether there's animals still left on the
46 table, it shuts down on that date no matter what right
47 now. And it would take, like Chair Christianson said,
48 it would take a proposal to the Board of Game in order
49 to change that and we recently just had our Southeast
50

0711

1 meeting in Wrangell and so those cycle every three
2 years so we wouldn't be changing anything for a few
3 more years, even if we wanted to.

4

5 MR. WOODS: That clarified, thank you,
6 Ben.

7

8 CHAIRMAN CHRISTIANSON: I think we
9 talked this one up and down, I don't want to call for
10 question, I think we could just call for read it into
11 the record.....

12

13 MS. LEONETTI: We need a motion.

14

15 CHAIRMAN CHRISTIANSON: I mean a motion
16 so we can read it into the record.

17

18 (Laughter)

19

20 MR. INGERSOLL: There we go. Mr.
21 Chair, Forest Service moves to modify the closure by
22 rescinding the closure for Unit 5A East and retaining
23 the status quo in Unit 5A West and to clarify the
24 regulatory language as recommended by Office of
25 Subsistence Management. If I get a second I'll explain
26 why I intend to support this motion.

27

28 MR. PENDERGAST: BLM seconds.

29

30 MR. INGERSOLL: Thank you. Mr. Chair,
31 in Unit 5A West I think there is agreement that the
32 closure is still needed, that it reflects a genuine
33 conservation concern. The State supports retaining
34 that closure. And in practice that hunt is used 100
35 percent by Federally-qualified users. On the other
36 hand, in Unit 5A East, the current closure does not
37 actually close anything. It is moot. It closes a
38 period of time that is not open to hunt and the
39 evidence is that in most years, in many years, that
40 quota is not fulfilled even by the end of the State
41 season so there is no evidence to suggest that we need
42 the closure and the closure, in fact, has no effect.

43

44 Thank you.

45

46 CHAIRMAN CHRISTIANSON: Deliberation.
47 Discussion.

48

49

50

0712

1 (No comments)

2

3 CHAIRMAN CHRISTIANSON: Please read
4 into the record and roll call.

5

6 MS. LEONETTI: Okay. The motion is to
7 modify the closure, which is Wildlife Closure Review
8 26-02 as recommended by OSM.

9

10 Forest Service Member Ingersoll.

11

12 MR. INGERSOLL: Support.

13

14 MS. LEONETTI: Public Member Pitka.

15

16 MS. PITKA: I support, thank you.

17

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

20

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

23

24 MS. LEONETTI: BIA Member John.

25

26 MS. JOHN: For this proposal the BIA
27 votes to modify the closure and rescind it for Unit 5A
28 East and retain it for 5A West as per the OSM
29 modification. Southeast RAC received testimony from
30 local tribal members and residents and used this to
31 recommend retaining this closure for both subunits. We
32 acknowledge the concerns expressed by the Council and
33 subsistence users regarding the potential for future
34 affects on their moose harvests if sporthunting
35 pressure does indeed increase. Should there be future
36 evidence of this a request to consider these closures
37 again would be warranted.

38

39 MS. LEONETTI: Public Member Oney.

40

41 MR. ONEY: Public Member Ray Oney moves
42 to support.

43

44 MS. LEONETTI: Public Member Woods.

45

46 MR. WOODS: Public Member Woods moves
47 to support.

48

49 MS. LEONETTI: Public Member Payenna.

50

0713

1 MR. PAYENNA: I support also.

2

3 MS. LEONETTI: BLM Member Pendergast.

4

5 MR. PENDERGAST: BLM supports WCR26-02
6 as modified by OSM to rescind the closure in Unit 5A
7 East and retain the status quo for the closure in Unit
8 5A West for the reasons stated by the Forest Service.

9

10 MS. LEONETTI: Park Service Member
11 Striker.

12

13 MR. STRIKER: Park Service supports.

14

15 MS. LEONETTI: Chair Christianson.

16

17 CHAIRMAN CHRISTIANSON: I oppose in
18 deference to the RAC.

19

20 MS. LEONETTI: Mr. Chair, the motion
21 passes nine to one.

22

23 CHAIRMAN CHRISTIANSON: Since it was
24 moot. Next one, wolf, WP26-10. This is what they call
25 the last one (makes howling sound)

26

27 (Laughter)

28

29 CHAIRMAN CHRISTIANSON: You have the
30 floor.

31

32 MR. CROSS: Thank you, Mr. Chair. For
33 the record my name is Robert Cross and I'm the
34 Subsistence Program Manager for the Tongass National
35 Forest with the U.S. Forest Service. Wildlife Proposal
36 26-10 submitted by the Craig Tribal Association could
37 be found in Volume II on Page 627 of your meeting book
38 and requests to establish a guaranteed 47 day wolf
39 trapping season by changing the end dates for wolf
40 trapping in Unit 2 from March 31st to December 31st.

41

42 The proponent states that rural
43 subsistence users in Unit 2 are losing harvest
44 opportunity due to inconsistent season management.
45 Although regulations currently allow for a five month
46 wolf trapping season it is frequently closed by
47 emergency order creating uncertainty for rural users
48 who rely on predictable harvest opportunities. Data
49 analysis indicates that there is a harvest surplus
50

1 above the established population goal of 150 to 200
2 wolves, yet rural users are not being provided
3 consistent access to this resource. The proponent
4 states that establishing a guaranteed 45 day season
5 would provide rural subsistence users of Prince of
6 Wales Island with a reliable predictable trapping
7 opportunity during the most productive trapping period,
8 and that would be November through December. The
9 proponent states that this would enhance subsistence
10 opportunity while still maintaining sustainable wolf
11 population management and aligns with the wildlife
12 management goals consistent with ANILCA.

13

14 Wolves continue to occupy important
15 cultural and economic roles in Southeast Alaska.
16 Wolves are also seen as a direct competitor for Unit 2
17 deer, which is an important subsistence resource. Long
18 time wolf trappers and hunters that participated in
19 recent research on the Alexander Archipelago Wolf have
20 explained that their trapping and hunting efforts
21 continue to be motivated by an effort to achieve a
22 healthy balance between wolf, deer and human
23 populations. Because deer are the preferred primary
24 prey for wolves in Unit 2, harvesters often use deer
25 abundance and difficulty of harvest as an index of wolf
26 populations and where wolf trapping needs to occur. An
27 over abundance of wolves can have a similar impact to
28 an over abundance of deer hunters, decreasing deer
29 numbers, making deer more skittish and increasing
30 competition for those that remain. Experienced hunters
31 and trappers explain that when wolf numbers are too
32 high, deer numbers decrease dramatically and there is
33 inadequate subsistence harvest. In Unit 2 this issue
34 is compounded by black bear predation, the loss of
35 quality deer habitat due to logging and competition
36 from non-local hunters. Accordingly the local
37 objective is to ensure adequate deer abundance and deer
38 proximity to communities for subsistence harvest.

39

40 There are two dimensions to consider.
41 Low abundance of deer from predation by wolves and deer
42 becoming too wary or skittish and, therefore, difficult
43 to harvest in the presence of active wolf packs. The
44 preferred means of maintaining a balance is by
45 subsistence hunting and trapping in places where
46 communities normally access and hunt deer and other
47 ungulates for subsistence purposes. Further, the
48 preferred method of accomplishing these objectives is
49 through heavy trapping and hunting in these key
50

1 subsistence use areas near communities on a three year
2 cycle, in which a substantial portion of the pack is
3 removed. Experienced trappers note that packs with
4 adequate prey and no other source of mortality can
5 increase in size by about 200 percent if left alone for
6 more than three years. However, current wolf trapping
7 and hunting regulations make this approach difficult.
8 Experienced wolf trappers noted that one issue with the
9 current regulation is that they are based on survey
10 methods that tend to produce inaccurately low
11 population estimates and it was explained that wolves
12 tend to follow the deer on Prince of Wales Island but
13 wolf surveying methods seem to miss key areas
14 frequented by wolves and deer.

15

16 So there's a very thorough regulatory
17 history in the analysis which starts on Page 632 of
18 your materials so I'm not going to read it all out but
19 I'll focus on a few notable items.

20

21 In 1993, 2011 and 2020 the Alexander
22 Archipelago Wolf was petitioned to be listed under the
23 Endangered Species Act. The Fish and Wildlife Service
24 subsequently found that the listing was not warranted.
25 In 1997 the Board of Game and Federal Subsistence Board
26 adopted harvest guideline levels to manage the Unit 2
27 wolf population which established annual harvest quotas
28 based on wolf population estimates. And then between
29 2013 and 2018 seasons closed early with reported
30 harvest well exceeding quotas in some years. In 2019
31 the Board of Game established the Unit 2 wolf
32 population objective range of 150 to 200 wolves and
33 altered the management strategy to be based on
34 population objectives instead of harvest quotas and
35 harvest guideline levels. From 2021 through 2025 State
36 and Federal wolf trapping seasons in Unit 2 were 31
37 days closing December 15th via emergency order and
38 special action respectively. In January of this year
39 the Board of Game approved a change to the Unit 2
40 population objective so it went from 150 to 200 to the
41 new objective of 200 to 300 wolves due to improvements
42 in wolf population estimates and to align with the
43 current management strategy. The Board of Game also
44 rejected proposals to extend the wolf trapping season
45 to 45 days on Prince of Wales Island and also to add
46 Unit 2 as an area for intensive management of wolves.
47 Between 1997 and 2018 total trapper numbers in Unit 2
48 ranged from four to 26 trappers per year and averaged
49 14.5 trappers per year. Over the same period trappers
50

0716

1 living in Unit 2 accounted from 60 to 100 percent of
2 the annual Unit 2 wolf harvest and averaged 89 percent.
3 Most of the local non-resident harvest was by adjacent
4 communities including Ketchikan, Petersburg, Wrangell
5 and Sitka. From 2020 to 2024 Unit 2 trapping harvest
6 averaged 69 wolves per year and recent estimates
7 indicate a stable wolf population and managers consider
8 harvest to be sustainably managed, however, levels of
9 inbreeding still appear to be high in this population.

10

11 So, again, from 2019 to present, ADF&G
12 and the U.S. Forest Service manager set the trapping
13 season based on most recent population estimates and
14 catch rate to allow for sustainable harvest of wolves
15 and so those population estimates are based off of hair
16 board DNA studies run by ADF&G and that's with help
17 from the U.S. Forest Service and also the Hydaburg
18 Cooperative Association. And there's roughly 156
19 sites, or 156 nodes and on each one of those nodes
20 there's five hair boards associated with that and those
21 go for about 10 weeks every fall to get the population
22 estimate.

23

24 I also want to point out, there's a
25 significant amount of ongoing research sponsored by our
26 colleagues at the Alaska Department of Fish and Game
27 and much of which will hopefully address concerns that
28 we hear each year during the public meetings and also
29 help to improve in-season management and so just a real
30 brief summary of those.

31

32 So one is that they're using cameras in
33 association with the hair boards to determine hair
34 board use rates by demographics and that's a concern
35 that we've heard at these meetings where there's
36 uncertainty as to whether maybe some of the age groups
37 or sexes are not being captured on the hair board
38 surveys as effectively as other demographics. There's
39 also a post-doctoral research that's conducting a whole
40 genome analysis over 500 wolves from GMUs 1 through 5
41 to look at population structuring and then those
42 findings will be used to investigate management options
43 to maintain or increase genetic diversity and
44 resilience in GMU 2 wolves and they may also learn
45 about the number of wolves needed for a sustainable
46 population in that area. And there's a Master's
47 student and researchers from Canada collecting DNA from
48 wolves in Coastal British Columbia to learn about gene
49 flow and interbreeding between wolves in Southeast
50

0717

1 Alaska and wolves in adjacent British Columbia.

2

3

4 And importantly it takes about eight to
5 10 months to get a population estimate and so ADF&G has
6 been sort of forced to use a single lab to process its
7 samples and so there's newly developed markers that may
8 allow managers to cut that processing time from months
9 to weeks.

9

10

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And then a few more, there's a post-
doctoral researcher sponsored by ADF&G that is looking
at factors that that influence the current abundance
modeling approach. And another sponsored PhD
investigating whether images from a 100 trail cams
systematically placed throughout Prince of Wales Island
can be used to estimate and monitor wolf abundance.

And then another concern that was heard
is that the population estimate may not be completely
accurate because of the differences in densities
between Prince of Wales Island proper and the outlying
islands and so there's an ADF&G sponsored PhD student
that is looking up to 10 outer islands using a canine --
or using a dog to locate wolf scat and look at the
differences in densities between those islands and the
mainland -- or sorry, the main island.

And so I just wanted to bring those up
because, you know, as you can tell there's a lot of
effort by ADF&G and the Forest Service is helping where
we can as well to support those efforts.

Okay.

And so the OSM conclusion is to oppose
Proposal WP26-10. This proposal may decrease
subsistence opportunity by shortening a potential 4.5
month trapping season to 47 days, however, it's
important to note that the four and a half month season
has been shortened to 31 days by the State and Federal
managers since 2021 to sustainably manage the
population. Also based on testimony at the Southeast
RAC meeting, I do believe the intent of the proposal is
to actually have a minimum season length of 47 days and
not to restrict the season length to 47 days. However,
the establishment of a minimum season length with no
harvest limit could impact the sustainability of this
population. It's inconsistent with sound management
principles and the conservation of healthy populations

0718

1 as required by ANILCA Section .802. And fluctuations
2 in harvest effort and success necessitate the use of
3 adaptive management.

4

5 And that concludes my presentation.

6

7 CHAIRMAN CHRISTIANSON: Thank you, Rob.
8 Any questions from the Board for Rob.

9

10 Don.

11

12 MR. HERNANDEZ: Thank you. Through the
13 Chair, this is Don Hernandez, Chair of the Southeast
14 RAC. Rob, we didn't have any of the latest information
15 from this season at our Council meeting, do you have
16 the wolf harvest for this previous season, trapping
17 season?

18

19 MR. CROSS: Yes, through the Chair,
20 Chair Hernandez. So we did receive a -- what was
21 categorized as a very preliminary wolf harvest estimate
22 or total from the 2025 season from the Alaska
23 Department of Fish and Game and that was from September
24 1st to -- September 1st through December 15th the total
25 was 45 wolves for 2025 and, again, that's very
26 preliminary.

27

28 CHAIRMAN CHRISTIANSON: Thank you. Any
29 other questions. Was there any written public comment
30 received.

31

32 MR. CROSS: Mr. Chair, there was no
33 written public comment received during the open comment
34 period.

35

36 CHAIRMAN CHRISTIANSON: Thank you.
37 Summary of tribal government, Alaska Native corporation
38 consultation.

39

40 MR. LIND: Thank you, Mr. Chair.
41 During the February and April consultation sessions,
42 Craig Tribal Association spoke in support and also
43 submitted a joint resolution, 26-02. And they hereby
44 unanimously supports the Craig Tribal Association
45 proposal for a guaranteed 45 day wolf trapping season
46 in Game Management Unit 2 and urge the Federal
47 Subsistence Board to adopt this important regulatory
48 change. That's all I have.

49

50

0719

1 CHAIRMAN CHRISTIANSON: Thank you.
2 Tribal leader, Alaska Native organization you have the
3 floor.

4
5 MR. COOK: Thank you, Mr. Chair. Thank
6 you to the Federal Subsistence Board for allowing us to
7 speak on our rural priorities and subsistence needs.
8 And I don't remember the guy before me but he was
9 right, we're not trying to change the existing 130 day
10 season, we want a guaranteed season for trappers so
11 there's a little bit of language flawing in there, I
12 don't know how it happened but I don't -- there's so
13 much in the wolf thing I don't even hardly know where
14 to start.

15
16 But I'll start with this, I also sit on
17 the local ADF&G as I said earlier, the committee. It
18 was disheartening to learn that the State was supposed
19 to manage wolves from 150 to 200 wolves in Unit 2. The
20 biologist for the State Dawson Dorf -- I can't find his
21 name, Dorendorf, he admitted he was not managing the
22 wolves as he was instructed to do, he was managing the
23 wolves to a 250 to 300 count because he was afraid of
24 the wolf being listed again as an endangered species.
25 How is that fair to us as subsistence users when the
26 State is flawing the numbers without even telling us.
27 It's not okay. The bottom line is Craig Tribal
28 Association in the end is not getting our subsistence
29 wolf needs met for our customary and traditional uses
30 of those wolves.

31
32 I would like to see more data on the
33 inbreeding. For now, to me, it's an accusation. I've
34 never seen a five legged wolves or one with two or
35 three years that says it's signs of inbreeding. The
36 data's not there to prove it. So I don't think they
37 should be talking about inbreeding if it ain't
38 substantiated.

39
40 The in-season co-management is a
41 failure. We watch the weather patterns when the season
42 opens and when the season is nearing a close I, as the
43 tribal President, reach out to the in-season game
44 management person who happens to be my local United
45 States Forest Service Ranger, to ask him for extending
46 our season due to inclimate weather conditions,
47 hurricane force winds, freezing conditions, snowy
48 conditions, within the same day of the email sent the
49 answer is no, we will not extend the season so the
50

0720

1 tribe can meet their substantial -- or subsistence
2 goals for the wolf harvest.

3
4 Lastly, this one's -- I can't even
5 believe this goes on, so back -- and I believe it was
6 2023, we were worried about our outside islands and our
7 archipelago, it ain't just Prince of Wales, we have
8 large islands associa -- around us where we subsist on.
9 We asked why are those islands not being counted for
10 the wolf. We as subsistence users know how many wolves
11 there are on these islands by the number of deer we're
12 able to harvest basically. So instead of using
13 traditional knowledge from various trappers and
14 hunters, what happens, we get Barley, an Australian
15 Shepherd that sniffs wolf poop. What a slap in the
16 face to our traditional knowledge that we know of our
17 own lands, our own homelands we know better. I seen
18 the dog in Craig before I traveled to Anchorage to
19 testify. They were having trouble getting it to load
20 on to the boat. It's going to start its procession of
21 sniffing wolf poop on May 8th on the outer islands
22 instead of using the knowledge that my constituents in
23 Unit 2 have to help us gain our subsistence goals on
24 wolf harvest.

25
26 We can go on and on and on about wolves
27 and data and where it's been and where it's going and
28 the bottom line is our subsistence needs for wolves are
29 not being met due to the mismanagement of wolves in
30 Unit 2.

31
32 Thank you.

33
34 MR. WOODS: Mr. Chair.

35
36 CHAIRMAN CHRISTIANSON: Thank you,
37 Clint. Go ahead, Frank.

38
39 MR. WOODS: Thank you for your
40 testimony. Have you read the -- let me see the
41 Regional Council recommendation supports WP26-10 with
42 modifications to keep the season and add to is, would
43 that help meet your subsistence needs?

44
45 MR. COOK: I'm going to refer to my
46 Chairman at the RAC too, but I believe it would help,
47 it would be a start to give us a little lengthier
48 season, that maybe the weather changes, we get some
49 warm weather and we're not worried about people out on
50

0721

1 the water, you know, trying to get their wolf either
2 trap gear in or stay out longer. So I think the
3 extended season would definitely help our way of life
4 to get those subsistence wolves. I don't know if it
5 would match what we need. As the tribal President, we
6 carry out various functions with culture every month at
7 our tribe, we have regalia-making, languages throughout
8 the year, and just by those numbers that we use for
9 wolf -- my number as Craig Tribe would be upwards of 20
10 wolves a year to meet my subsistence needs for my
11 tribe. Multiply that times four, that's 80 wolves.
12 There's four tribes on the Island, I can't speak for
13 all of them. But I'd hope to think that their
14 subsistence needs are similar to mine so I think it
15 would enhance our numbers to meet the goal of
16 subsistence.

17

18 Thank you for the question.

19

20 CHAIRMAN CHRISTIANSON: Thank you,
21 President Clint.

22

23 Any other tribal or Native organization
24 testimony.

25

26 (No comments)

27

28 CHAIRMAN CHRISTIANSON: Hearing and
29 seeing none.....

30

31 MS. BURNS: (Coughing)

32

33 (Laughter)

34

35 CHAIRMAN CHRISTIANSON: Oh, there you
36 are, sorry, there's a camera there and you're dressed
37 in red, you were kind of -- you know how they say.

38

39 (Laughter)

40

41 MS. BURNS: (In Haida) My name is
42 Gloria Burns. Also (In Haida) President of Ketchikan
43 Indian Community. In Ketchikan we're seeing an
44 increase of wolf all over the place and so as we're
45 listening to the traditional and ecological knowledge
46 that comes from the people closest to the land in
47 Craig, I just want to point out that as a Federally-
48 qualified user, Ketchikan Indian Community, in
49 Ketchikan is not meeting our subsistence need. So I
50

0723

1 abilities and traditional knowledge of the people that
2 are living on what is now in English known as Prince of
3 Wales Island.

4

5 CHAIRMAN CHRISTIANSON: Thank you,
6 Gloria. Any other tribal Native organization testimony
7 today.

8

9 MR. BEAN: Good evening. Aaron Bean
10 with the Craig Tribe again. Mr. Chair. Members of the
11 Board. Thank you for your time.

12

13 The Craig Tribal Association strongly
14 supports the approval of Proposal WP26-09 -- I'm sorry,
15 wait I might be on the wrong -- okay, hang on a second
16 -- okay, I gotcha. WP26-09 and WP26-10 and
17 respectfully opposes the Office of Subsistence
18 Management's recommendation to oppose them.

19

20 OSM's justification for opposition
21 fails to address the core issue that prompted the Craig
22 Tribe to submit these proposals to begin with. The
23 State of Alaska has repeatedly used emergency order
24 powers to close the wolf trapping season on Prince of
25 Wales Island long before the regulatory season ends.
26 We feel that it is patronizing and misleading to claim
27 that these proposals decrease subsistence opportunity
28 by shortening the potential 4.5 month season. When
29 substantively it's been closed repeatedly long before
30 that. In reality the season almost never open for
31 anything close to 4.5 months because the State
32 routinely shuts them down early. To suggest otherwise
33 ignores decades of actual management practice and
34 should be disregarded by the Board as a basis for
35 denial. The assertion that these proposals are
36 "inconsistent with current harvest management
37 strategies" likewise rings hollow. The tribe has
38 watched the State manage wolves on Prince of Wales
39 Island for years and current approach has not delivered
40 reliable subsistence opportunities for tribal citizens.
41 Fluctuation and efforts, success, unreported mortality
42 do not justify leaving season lengths entirely to the
43 discretion of managers who have historically
44 prioritized other interests, other than tribal
45 subsistence needs. OSM's heavily reliance on the claim
46 of "unreported and illegal harvest" is particularly
47 alarming. We brought this up at the RAC level in
48 Juneau this year. OSM cites a study Pearson and
49 Russell dated from 2008 to assert that unreported human
50

1 caused mortality equals 47 percent of human caused
2 mortality. If you take a look at the study you can see
3 that it's very flawed, it's outdated. It examines only
4 55 radio collared wolves in Game Management 2 between
5 1993 and 2004, well over 20 years ago. This sample is
6 not random, it consisted of collared animals whose
7 behavior and vulnerability to harvest may have been
8 altered by the collars themselves. Detection of
9 mortalities depended on location of these specific
10 collared wolves introducing search effort and collared
11 failure biases. The study area was limited to one
12 island population within its own unique road access and
13 human -- clearly using human use patterns,
14 extrapolating 47 unreported mortality -- 47 percent
15 unreported mortality rate from this narrow dated
16 methodology compromised the data set to justify current
17 Federal policy is scientifically indefensible and
18 should be rejected on its face.

19

20 The Board should not allow antiquated
21 paper to override the lived experiences of the people
22 of Prince of Wales Island. More fundamentally, it's
23 important to note that the State of Alaska has never,
24 truly fully recognized Alaska Native tribe subsistence
25 rights. Has a documented history of criminalizing
26 traditional Native lifeways. It's very existence -- at
27 the very existence of the Federal Subsistence
28 Management Program under ANILCA stems from the State's
29 refusal to conform its Constitution to the statutes of
30 Federal law. Congress enacted ANILCA as rural
31 subsistence priority precisely because the State would
32 not protect it. The failure has been repeated,
33 confirmed by Federal courts in cases like Katie John,
34 the Ninth Circuit held that the State's equal access
35 provisions conflict with ANILCA and the Federal
36 government must step in to protect subsistence uses on
37 Federal lands and waters when the State does not.

38

39 More recently, in August 20 of 2025,
40 the Ninth Circuit in United States v. Alaska, case
41 number 24-2251 reaffirmed that Federal authority over
42 subsistence fishing on navigable waters and rejected
43 the State's attempt to limit Federal oversight. The
44 State petitioned the U.S. Supreme Court review, the
45 petition was denied in January of '26. These rulings
46 are not opinions, they are binding Federal law. OSM's
47 process exists because the State has no business
48 unilaterally managing subsistence resources on Federal
49 lands in a manner that disregards ANILCA.

50

1 Wolves hold a central part of Haida and
2 Tlingit social organization of world views. A Haida
3 and Tlingit society have structured moieties, raven,
4 and wolf and eagle with specific clans and house
5 tracing decent to the wolves. Wolves are viewed as
6 relatives and protectors in our culture. As elders
7 from Craig and other communities throughout Southeast
8 Alaska describe rituals of respect. Before and after a
9 harvest of a wolf, a hunter talks to the wolf, they
10 explain their presence, they ask for protection, they
11 share water and salt with the animal as it's closing
12 its eyes or it helps -- or the person helps close the
13 wolf's eyes. We are not poachers. So I got to say
14 that again, we are not poachers. This is not a sport.
15 It's an act of reciprocity. Wolves are never taken
16 causally, the act honors the animal and maintains
17 balance in our ecosystem, one ecosystem that is not
18 being acknowledged now as we've testified and we've
19 been trying to push for this for awhile, we think that
20 there's far more wolves than what the State claims
21 there is.

22
23 These protocols reflect the ancient
24 continuous relationship between our people and the
25 wolves. Documented archaeologically back to the time
26 of the mammoths on Prince of Wales Island. Approving
27 these proposals would align Federal management with
28 ANILCA's mandate with tribes customary and traditional
29 uses. ADF&Gs own 2008 customary and traditional use
30 worksheet for wolves in Game Management Unit 1, 3, 4
31 and 5, special publication number BOG2008-09 confirms
32 that wolves have long been taken and used for
33 subsistence by residents of Southeast Alaska Native
34 communities, including those areas in Craig and on
35 Prince of Wales Island. This finding is further
36 supported by the landmark 1946 Schmidt and Haas report,
37 the commission of Indian Affairs, which documented the
38 promissory rights of traditional territories of the
39 Natives in Southeast Alaska, including the extensive
40 use of resources throughout Prince of Wales Island by
41 region of the ancestors. The same region by the
42 ancestors of Craig's tribal citizens today.

43
44 These proposals do not undermine
45 sustainability, they'll restore predictability and
46 fairness to a system that has repeatedly failed
47 subsistence users.

48
49 As the Southeast Alaska Regional
50

0726

1 Advisory Council has requested, we urge managers to
2 incorporate traditional ecological knowledge and direct
3 input from localsubsistence users when seasonlengths --
4 when -- sorry, this isn't written right, let me read
5 this -- we direct input from local subsistence users
6 when setting season lengths each year. If the
7 government had followed this directive to begin with we
8 wouldn't be here today.

9
10 The Craig Tribe thanks you for your
11 time. We ask that you please approve these proposals
12 and doing so this will help honor ANILCA, respect our
13 tribal sovereignty and ensures that the Federal
14 government, not the State, fulfills its trust
15 responsibility to protect subsistence opportunity for
16 Alaska Native people.

17
18 Thank you.

19
20 And I'll just add that we would also
21 like to just put a note and, I guess, mention it, that
22 we've been in talks with OSM and the State throughout
23 this process and one thing that I think is lacking is
24 that resources for the tribes on Prince of Wales Island
25 to help supplement or work with the State to gather a
26 little more accurate data, as much as I appreciate some
27 of the methodology that they're using, I think that
28 there's probably better ways to be collecting this data
29 and finding a more accurate number. I drafted a
30 previous comment but I think it was covered in -- I
31 don't believe adding, at the rate, historically, that
32 has been -- that wolves are harvested, adding an
33 additional 15 days on average would likely result in 15
34 wolves, is still within the error bars of the State's
35 management. So in other words, if they're managing for
36 300 and they're harvest -- we're not harvesting
37 anything near that, I don't see how that would be a
38 conservation concern because I know that's one of the
39 things in ANILCA that you guys look at is so long as it
40 doesn't present a conservation concern but, clearly,
41 this would fall within what the State says is out there
42 anyway, although we disagree with the amount, we
43 believe there's far more. Just for your information.

44
45 Thank you for your time.

46
47 CHAIRMAN CHRISTIANSON: Thank you,
48 Aaron, appreciate your testimony. Next.

49
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0727

1 MR. JONES: Hi, thanks again, Mike
2 Jones, Organized Village of Kasaan. Kasaan supports 47
3 days as a start, not closing the 137 day State season
4 and season management does not work, Kasaan needs 20
5 wolves to meet our needs. The mismanagement to the
6 numbers -- there is mismanagement to the numbers of the
7 population, we believe, and there's no signs to the
8 inbreeding and finally, let's send in the poop sniffing
9 dog Barley and Lassie to save our subsistence needs.
10 So that's all I got.

11
12 Thank you all so much for all your
13 consideration and your time today. Thanks.

14
15 CHAIRMAN CHRISTIANSON: Thank you, Mr.
16 Jones. Any more tribal or Alaska Native organizations.

17
18 (No comments)

19
20 CHAIRMAN CHRISTIANSON: Next, Advisory
21 group, SRC, State, multiagency.

22
23 MS. LAVINE: We received no comments.

24
25 CHAIRMAN CHRISTIANSON: Thank you.
26 Public testimony, here or online, please raise your
27 hand to be recognized.

28
29
30 (No comments)

31
32 CHAIRMAN CHRISTIANSON: Seeing or
33 hearing none we'll go to Council recommendation on this
34 proposal.

35
36 MR. HERNANDEZ: Thank you, Mr. Chair.
37 Don Hernandez for the Southeast RAC. Wildlife Proposal
38 26-10. The Council voted to support with a
39 modification. The proposal to establish a 45 day
40 guaranteed season for trapping wolves in Unit 2, the
41 modification was that the Council voted to retain the
42 codified season dates in regulation, which means that
43 March 31st date, we wanted to maintain that in
44 regulation. We didn't want to change it to December
45 15th. However, we wanted to have stipulate that the
46 season must be at least 40 days long, stating that the
47 season cannot close any earlier than December 24th. So
48 kind of a wording issue there to maintain that March
49 31st as the official season date but recognizing that
50

0728

1 through all this special action it's been closing
2 earlier so we want to put into regulation that it
3 cannot close earlier than December 24th.

4

5 Okay.

6

7 So our justification for that is
8 Southeast Council believes that the Unit 2 wolf
9 population is healthy, and that a 40 day trapping
10 season would not create a conservation concern or
11 result in overharvest. The recommendation was based on
12 local knowledge of wolf populations and trapping
13 practices from Council members as well as from tribal
14 testimony during the meeting. The Council believes
15 that subsistence needs for wolves are not being met in
16 Unit 2 and the guaranteed 40 day season will benefit
17 subsistence users by providing more opportunity helping
18 them meet their needs.

19

20 Also, I want to add, I hope the Board
21 has received a letter that was written at our last
22 meeting. I know it's been in the works and I hope
23 you've received it by now. But the letter was sent
24 through the Board to the -- directed to the Regional
25 Forester, to direct his in-season manager to not
26 automatically close the hunting season when they close
27 the trapping season, as has been done, for the last
28 number of years, so it could possibly offer some
29 additional opportunity for subsistence harvest through
30 hunting and as we've heard from the Staff that, you
31 know, hunting -- take by hunting in a very small
32 number, but it would offer maybe some opportunity for
33 subsistence people who are out there doing other
34 activities, which would be mid-winter, you know,
35 there's not a lot of activity out there but there are
36 some people out trapping marten and mink and otter and
37 they might encounter a wolf. There's very little deer
38 hunting happening in that late winter, most of the
39 wolves that are taken during the hunting season
40 probably are in conjunction with people out deer
41 hunting who would encounter a wolf. So we'd really
42 like the District Ranger to seriously consider that
43 letter and we wanted to bring that to the attention of
44 the Board.

45

46 So, yeah, that concludes the Council's
47 comments.

48

49 Maybe just to anticipate a question

50

1 that might have arisen or might arise here after all
2 the tribal testimony. You know, what the Council heard
3 in regards to subsistence users not meeting their
4 needs, it's kind of a new situation that we hadn't
5 really heard about prior to this past year, but
6 basically now that these seasons have gotten so short,
7 you know, 30 day season, it's kind of turned wolf
8 trapping into kind of like a trapping derby. You know
9 there's a lot of really successful trappers out there
10 and, you know, the way trapping works they're doing it
11 to make money as well. You know wolf pelts are still
12 worth a fair amount of money. And, you know, it just
13 kind of diminishes the opportunity for people who want
14 to harvest a wolf to do their traditional handicrafts
15 and, you know, regalia, so that's kind of been the
16 situation here recently with these compressed seasons.
17 So we do want to try and offer some more opportunity
18 for somebody other than a hardcore professional trapper
19 to harvest a wolf. So that's what we're looking for.

20

21 Thank you.

22

23 CHAIRMAN CHRISTIANSON: Jerry.

24

25 MR. INGERSOLL: Question. Just so I
26 understand when you say a guaranteed season, that would
27 -- removes the authority of the Federal in-season
28 manager to close the season early no matter how many
29 wolves were harvested and no matter what the
30 conservation concern might be, correct?

31

32 MR. HERNANDEZ: That would be correct,
33 yes.

34

35 MR. INGERSOLL: Thank you. Question.
36 With the permission of the Chair, question for Staff,
37 could the in-season manager, if they were presented
38 with substantial evidence that a conservation concern
39 hadn't been reached yet, under current rules, have a
40 longer season than 30-something days.

41

42 MR. CROSS: For the record, again,
43 Robert Cross with the U.S. Forest Service. Through the
44 Chair. Member Ingersoll. Yes, that's correct. So
45 the in-season manager, which would be the Ranger of
46 Prince of Wales Island has been delegated authority by
47 the Federal Subsistence Board to close, reopen or
48 adjust Federal hunting and trapping seasons on Prince
49 of Wales Island, so, yes, they could leave it open
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0730

1 longer.

2

3

MR. INGERSOLL: Thank you.

4

5

CHAIRMAN CHRISTIANSON: Thank you, Don.
6 State of Alaska.

7

8

MR. MULLIGAN: Thank you, Mr. Chair.
9 For the record the Alaska Department of Fish and Game
10 opposes the proposal as it would misalign State and
11 Federal regulations. This proposal came up at our
12 Southeast meeting in Wrangell, while the Department was
13 neutral on that, the Board of Game chose to take no
14 action on this very similar proposal.

15

16

Thank you.

17

18

CHAIRMAN CHRISTIANSON: Thank you, Ben.
19 InterAgency Staff Committee.

20

21

22

MS. LAVINE: Thank you, Mr. Chair.
23 ANILCA .802 states -- oh, I'm sorry, go ahead.

23

24

CHAIRMAN CHRISTIANSON: Go ahead,
25 sorry.

26

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MR. HERNANDEZ: Thank you, Mr. Chair.
Through the Chair. I was wondering if I could ask the
State some questions on their management. And I'd like
to preface that by saying that at our Council meeting,
you know, we had been informed about the new management
strategy that was adopted by the State and our Council
obviously had questions to ask about that and the State
was not able to send anybody to our meeting from
wildlife to answer questions so I mean there are --
there is maybe an important question the Council might
like to have, you know, on the record if that's
appropriate.

40

41

CHAIRMAN CHRISTIANSON: Yes.

42

43

44

45

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MR. HERNANDEZ: Okay. First of all, I
guess I should disclose that for the past three years I
have been a temporary part-time employee of the
Department of Fish and Game. I've been running one of
your hair board studies collecting wolf hair DNA on the
north end of Prince of Wales for the past three years
so I've been involved in that.

0731

1 So I guess the Council would really
2 like to hear a firm rationale to why the State, you
3 know, felt it was necessary to change their management
4 strategy, a strategy that was, you know, brought before
5 the Council to be considered and the Council bought
6 into that original management strategy. We were fully
7 engaged in that. And then just as some background,
8 I'll point out that under the old management strategy
9 that we had been operating under, you know, the 150 to
10 200 wolves, all of the harvest during that period fell
11 within the upper range of that -- I guess I -- yeah,
12 the upper range of that management strategy, it was
13 over 200 -- the population stayed over 200 wolves, well
14 over 200 wolves, by that strategy, you know, there
15 should have been at least a two month season at least
16 and it was always kind of limited to 30 days. So then
17 it kind of appears to the Council whereas the old
18 management strategy kind of dictated the length of the
19 season depending on the population estimate, this new
20 management strategy seems to dictate the management
21 strategy based on the season length more or less. So I
22 don't know, we'd kind of like an explanation to what
23 your rationale was for changing that management
24 strategy.

25
26 MR. MULLIGAN: Through the Chair. I'm
27 just going to be candid with you, I'd love to be able
28 to give it to you but at this point in time I do not
29 have the details. I was not involved at that meeting,
30 I was not at the Board of Game meeting in Wrangell.
31 The appropriate venue would have been at the RAC
32 meeting but as we informed you guys, when you set your
33 date, Staff could not attend. I mean I would encourage
34 to work with our area Staff who are the experts on that
35 and the regional Staff who could answer that question.
36 I know that's not the answer you wanted to get but by
37 putting us on the spot here didn't help either. Like I
38 said, the appropriate venue is to get those experts in
39 the room who helped craft that. At this time I just
40 can't give you that answer.

41
42 MR. HERNANDEZ: Appreciate that. I
43 also should let the Board know that our Council Chair
44 was scheduled to attend that Board of Game meeting and
45 could have interacted with some of the Staff there but
46 we were told there was no funding to send RAC members
47 to, you know, State Board of Game meetings so nobody
48 was there in person, I called into the meeting, you
49 know, you get an opportunity to give your testimony and
50

1 if they don't ask you any questions you're kind of done
2 so didn't really have that opportunity to engage with
3 the biologists who were there at the meeting
4 unfortunately. You know, one of whom was my, you know,
5 boss, at the time, I was working for him and, you know,
6 we've had a lot of discussions about wolf management,
7 you know, you've got really good people working for
8 you, you know, they do some really good work. I'm
9 really pleased to be a part of that whole study but,
10 you know, we don't always get the chance to engage as
11 much as we'd like so it's unfortunate.

12

13 MR. MULLIGAN: Through the Chair. I
14 think the Department and specifically for the Southeast
15 RAC we have a long history of getting our folks, not
16 only just online but they travel to your meetings
17 whenever possible and I know that -- so the default is
18 to try to get there, to be there for you guys, in this
19 case we just had a conflict and it didn't work out with
20 it. I appreciate the sentiment. I -- given the nature
21 of my position, I am a generalist of all things and a
22 master of none and I do want -- honestly not to think I
23 was flippant about that, I would really -- I mean would
24 want to be able to give you the details that you need,
25 I just personally can't do that myself at this meeting
26 so I apologize.

27

28 MR. HERNANDEZ: Okay, thank you very
29 much.

30

31 CHAIRMAN CHRISTIANSON: Thank you. Any
32 other questions for our RAC Chair.

33

34 (No comments)

35

36 CHAIRMAN CHRISTIANSON: ISC.

37

38 MS. LAVINE: Thank you, Mr. Chair.
39 ANILCA .802 states that it is the policy of Congress to
40 manage fish and wildlife populations consistent with
41 sound management principles and the conservation of
42 healthy populations. ANILCA .815 states that nothing
43 in this title shall be construed as permitting the
44 level of subsistence users of fish and wildlife within
45 a conservation unit to be inconsistent with the
46 conservation of healthy populations. A guaranteed
47 season length with no harvest limit regardless of
48 harvest or population size would violate recognized
49 principles of sound wildlife management and is
50

1 therefore counter to ANILCA's conservation mandate.

2

3

4 In addition, in-season management
5 flexibility would be limited if a guaranteed season
6 length with no harvest limit were adopted into
7 regulation, thus, the Board would also have to delegate
8 authority to the in-season manager to set a harvest
9 quota because there is no harvest limit for wolves in
10 Unit 2. Due to the limited in-season management
11 authority proposed by this regulation, the in-season
12 manager would have to elevate action back to the Board
13 each season if a conservation concern were to arise.

13

14

15 In summary, implementing a minimum
16 season length for Prince of Wales wolves in regulation
17 would take management flexibility away from in-season
18 managers, could potentially create conservation
19 concerns and may result in a fourth Endangered Species
20 Act listing petition with the U.S. Fish and Wildlife
21 Service. It would also result in additional work by
22 the State and Federal in-season managers and
23 unnecessarily jeopardize the management partnership
24 between ADF&G and the U.S. Forest Service as well as
25 creating confusion among users.

25

26

Thank you, Mr. Chair.

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CHAIRMAN CHRISTIANSON: Thank you,
Robbin. Board discussion with the Liaison, Council
Chair, rep, last chance to ask a question.

(No comments)

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

MR. INGERSOLL: Mr. Chair. Forest
Service moves to adopt WP26-10. If I get a second I
will explain why I intend to oppose my motion.

MR. STRIKER: Park Service seconds.

MR. INGERSOLL: Mr. Chair. This is
really difficult. First of all I deeply respect the
testimony of multiple Federally-recognized tribal
governments and the work of the Southeast Regional
Advisory Council on this issue. And I respect tribal
traditions of harvest and reciprocity, that matters,
and we recognize that local and tribal testimony

1 suggests that the wolf population is higher than what
2 they would like and specifically that they need more
3 wolf pelts for ceremonial and other traditional
4 subsistence uses. And that speaks to me.

5
6 And we oppose this motion because it is
7 fundamentally inconsistent with Federal law and ANILCA
8 and with sound principles of conservation management.

9
10 ANILCA Section .802 says the Program
11 must be implemented consistent with sound management
12 principles and the conservation of healthy populations.
13 ANILCA Section .805 give deference to the RACs unless
14 their recommendation violates recognized principles of
15 fish and wildlife conservation. ANILCA Section .815
16 states that nothing in this title shall be construed as
17 permitting the level of subsistence uses of fish and
18 wildlife to be inconsistent with the conservation of
19 healthy populations.

20
21 The Endangered Species Act ultimately
22 charges us with preventing populations from becoming
23 listed as threatened or endangered, of conserving the
24 population so that they do not become endangered and
25 we've had three petitions for listing of the Alexander
26 Archipelago wolf. The reason those petitions have not
27 been successful and the wolf is not now listed is
28 because of the demonstrated robust conservation
29 management that has been implemented between the State
30 and the Forest Service and we expect another petition
31 and another petition after that. And the way that we
32 protect our continued ability to harvest wolves and use
33 wolves and prevent their listing is by demonstrating
34 through the Endangered Species Act and in consultation
35 with the Fish and Wildlife Service that we are taking
36 active measures to prevent that population from
37 becoming endangered.

38
39 The Board of Game has rejected some
40 more proposals. And it's worth pointing out that most
41 wolf harvest on Prince of Wales Island in Unit 2 is
42 actually not on the Federal lands and so in order to
43 manage this population successfully we must do it
44 together.

45
46 Finally, this proposal would remove the
47 authority of the in-season manager to manage the
48 population based on emergencies. It would set in our
49 rules an unlimited harvest, without an ability to close
50

0735

1 it in-season and that's a fundamental violation of
2 wildlife conservation principles. That's why we must
3 oppose this motion.

4

5 CHAIRMAN CHRISTIANSON: Any Board
6 discussion, deliberation.

7

8 (No comments)

9

10 CHAIRMAN CHRISTIANSON: Read in the
11 motion and roll call please.

12

13 MS. LEONETTI: The motion is to adopt
14 Wildlife Proposal 26-10.

15

16 Forest Service Member Ingersoll.

17

18 MR. INGERSOLL: Oppose.

19

20 MS. LEONETTI: Park Service Member
21 Striker.

22

23 MR. STRIKER: Park Service is nay on
24 the motion. Park Service opposes WP26-10 with apologies
25 to the RAC for the reasons I think very, very well
26 articulated by the Forest Service. We just can't.

27

28 MS. LEONETTI: Public Member Pitka.

29

30 MS. PITKA: I vote to oppose WP26-10,
31 it violates recognized principles of fish and wildlife
32 conservation and would cause a species to get listed on
33 the ESA. Thank you.

34

35 MS. LEONETTI: Fish and Wildlife
36 Service Member Boario.

37

38 MS. BOARIO: Fish and Wildlife Service
39 opposes for the reasons the Forest Service stated and I
40 apologize that I don't have our species status
41 assessment for the Alexander Archipelago Wolf with me
42 or memorized. But I feel like I remember that -- first
43 of all, I know the geography for the Alexander
44 Archipelago wolf is far larger than just Prince of
45 Wales in determining the listing status and I don't
46 believe that we determined that they were a distinct
47 population segment so I just -- while I oppose I'd be
48 really cautious about how we're portraying a potential
49 listing and the impact on Prince of Wales Island. I

50

0736

1 apologize that I can't doublecheck that but I really
2 think that might be speculating a bit too far. But I
3 do oppose and wish I had the exact information to be
4 really clear about that.

5

6 Thank you.

7

8 MS. LEONETTI: BIA Member John.

9

10 MS. JOHN: BIA votes to adopt WP26-10
11 with the Southeast Regional Advisory Council
12 modification.

13

14 We concur with the Council's
15 justification and use of the local hunters and trappers
16 expertise regarding wolf abundance in developing their
17 recommendation. Testimony from Unit 2 tribes and the
18 other users about their inability to meet wolf pelt
19 needs for traditional handicrafts also supports this.
20 We appreciate the Councils extensive efforts to develop
21 this proposal for the benefit of Federal subsistence
22 users on Prince of Wales Island.

23

24 MS. LEONETTI: Public Member Oney.

25

26 MR. ONEY: Public Member Ray Oney moves
27 to adopt 26-10.

28

29 MS. LEONETTI: Public Member Woods.

30

31 MR. WOODS: Boy Public Member Woods
32 moves to oppose 26-10. I would have loved to have some
33 sort of recommendation from tribal to make the
34 modification that the RAC came up with. Those things
35 would have been -- not only helped, I think, the
36 process, but also recognized that we don't want to go
37 into a species of concern or the Endangered Species Act
38 or conservation concerns starts triggering, reeling
39 back our subsistence opportunities. Those things are
40 real, what the Forestry pointed out are glaring facts
41 for me and I commend the RAC for sitting down with
42 ADF&G and working out, at least, some of the issues,
43 here at this table, that means a lot and that's a
44 beginning of a longstanding solution because right now
45 the problems I see are temporary. Because if you don't
46 have a handle on the harvest -- number 1, 45 wolves got
47 caught this year and if we're not sitting at the table
48 negotiating with the State and the Feds, like I pointed
49 out as tribal entities and we're always arguing and
50

0737

1 fighting amongst each other, the opposition will have
2 their way and the opposition is to go until it's all
3 gone. I say that with grace because number 1 I sit on
4 the table, where I sit in an area where all the caribou
5 is gone, we have no options but to go to the Federal
6 government and beg for a caribou. We heard testimony
7 time and time again that this process does not feed us,
8 that this process does not work and we complain and we
9 sit at the table but we don't talk to one another. The
10 hardest thing as a subsistence user is to admit that I
11 might be wrong, that I might not have the answers. I
12 sat with a biologist, the concern -- well, we have the
13 opposite problem as the Southeast, we have too many
14 wolves, and unlike Southeast those wolves have eaten
15 everything. You look for a State hunt on Federal land,
16 the Mulchatna went from 200,000 to 13,000 and now we go
17 to the State and ask them and beg them for a caribou,
18 I'm saying this because I think this is going to be an
19 ongoing issue for the rest of the history of the state
20 of Alaska.

21

22 And I want our young people to be fully
23 engaged and I respect everybody's position here whether
24 it's right or wrong, whether I disagree or disagree
25 [sic] and that's the main point here is that we all
26 come with the best information that we have and what I
27 read is I didn't agree with. I would love to have the
28 recommendation like BIA pointed out, that I would agree
29 to that, but as I'm looking at the screen, I'm voting
30 on WP26-10 with no modification so I have to vote it
31 down, Mr. Chair. Thank you.

32

33 MS. LEONETTI: Public Member Payenna.

34

35 MR. PAYENNA: I respect all the public
36 testimony that was given but I'm afraid I will have to
37 agree with the Forest Service and oppose the motion.

38

39 MS. LEONETTI: BLM Member Vickers.

40

41 MR. VICKERS: Oppose 26 -- WP26-10.
42 BLM recognizes concerns of the different stakeholders
43 here. Southeast Alaska Council members, tribal
44 members here and other Federally-qualified subsistence
45 users have shared TEK and that there should be more
46 opportunity to harvest wolves under Federal
47 regulations.

48

49 I greatly appreciate hearing more about

50

0738

1 the cultural significance of wolves to the tribes of
2 Southeast and am disheartened to hear that their
3 subsistence needs are not being met.

4

5 There are many reasons that the
6 subspecies of wolf must be managed with caution. The
7 harvest rates are relatively high and a guaranteed
8 season length could potential lead to overharvest,
9 especially if there are successive years with high
10 harvest numbers. BLM appreciates U.S. Forest Service
11 working closely with Alaska Department of Fish and Game
12 and other stakeholders to culminate adaptive management
13 actions. Unfortunately the data does not support
14 setting a minimum season or a guaranteed season length.
15 U.S. Forest Service in-season manager should maintain
16 delegated to set season length with input from local
17 subsistence users to ensure that they are meeting their
18 subsistence needs.

19

20 Thank you.

21

22 MS. LEONETTI: Chair Christianson.

23

24 CHAIRMAN CHRISTIANSON: I support in
25 deference to the RAC. I think I probably got some of
26 the longer history working on this project being the
27 original hair board study guy with the HCA and sitting
28 at the State and Federal as we tried to figure out this
29 plan, talk about a mistrust between agencies to start
30 with and put yourself in the middle as an Indian, we're
31 still doing the same thing, we're still plucking
32 feathers from a turkey and trying to feed it to
33 ourselves. It's a tough one.

34

35 I live there. We have seen it put in
36 the area biologists hands when we operated out of fear
37 and we eroded trust especially with this specific
38 species with the rural user really bad. It's still a
39 really highly contentious issue as you could hear today
40 but when you're operating in a vacuum where special
41 interest groups are driving the agenda here and we keep
42 repeating it. I don't like operating in fear and we
43 got to put ourselves -- or don't change the game or
44 push the bus down the road for your people, you sit
45 back and wait for the wreck to happen, you grab the
46 wheel, you drive it and you go forward.

47

48 Like I say, I got a lot of history with
49 this, close to home for that I support.

50

0739

1 MS. LEONETTI: Okay, Mr. Chair, the
2 motion fails three in support, seven opposed.

3
4 CHAIRMAN CHRISTIANSON: Let's take a
5 five minute break, thank you. And good job, thank you
6 guys for getting through the wildlife, we've got next
7 on the agenda consensus agenda to be adopted.

8
9 (Off record)

10
11 (On record)

12
13 CHAIRMAN CHRISTIANSON: Next up is the
14 consensus agenda and adoption.

15
16 MS. GREDIAGIN: All right, thank you,
17 Mr. Chair. This is Lisa Grediagin, the Wildlife
18 Division Supervisor at OSM. I will be super speed
19 reading all the consensus agenda proposals and closure
20 reviews along with the recommendations into the record.
21 These are the proposals and closure reviews for which
22 there is agreement among the Federal Subsistence
23 Regional Advisory Councils, the Federal InterAgency
24 Staff Committee and the Alaska Department of Fish and
25 Game concerning Board action. The following are the
26 consensus agenda proposals and closure reviews.

27
28 Wildlife Proposal 26-02 requests to
29 prohibit the take of large land mammals in Units 1
30 through 5 from civil sunset until civil sunrise. The
31 recommendation is to oppose.

32
33 WP26-09 requests to move the starting
34 date for the wolf trapping in Unit 2 from November 15th
35 to December 15th. The recommendation is to oppose.

36
37 WP26-11 requests the closure of Federal
38 public lands on Hawkins Island and Hinchinbrook Island
39 in Unit 6C to hunting for black bears by non-Federally-
40 qualified users and to require a Federal registration
41 permit. The recommendation is to oppose.

42
43 WP26-18/19/20 and 23 requests
44 prohibiting trap or snare usage in designated areas on
45 the Kenai Peninsula in Unit 7 unless they meet certain
46 criteria. All proposals request to limit trapping
47 within a certain distance around and along campgrounds,
48 beaches, roads and trails within 100 or 50 yards,
49 depending on location. WP26-21 requests to make active
50

0740

1 trapping sites mandatory at all access points to
2 operating traplines. The recommendation is to support
3 WP26-19 as modified by OSM and to take no action on the
4 remaining proposals.

5

6 WP26-25/26 requests to increase the
7 harvest for brown bears in Unit 13 to two bears. The
8 recommendation is to support.

9

10 WP26-35 requests to extend the fall
11 season for caribou in Unit 9D to October 21st. The
12 recommendation is to support.

13

14 WP26-36 requests to shorten the
15 wolverine hunting season in Unit 9 to match the State
16 season of September 1st to the last day of February.
17 The recommendation is to support.

18

19 WP26-37 requests to remove the firearm
20 restrictions for beaver trapping in Units 9 and 17.
21 The recommendation is to support as modified by OSM.

22

23 WP26-38 requests to increase the
24 harvest limit from brown bears in Unit 17 from one to
25 two bears and eliminate the State registration
26 requirement. Proposal WP26-39 requests to extend the
27 brown bear season in Unit 7 to yearround. The
28 recommendation for both proposals is to support.

29

30 WP26-40 requests to close Federal
31 public lands in portions of Unit 17A and 17C to caribou
32 hunting by non-Federally-qualified users and Federally-
33 qualified subsistence users except those Federally-
34 qualified subsistence users residing in Togiak, Twin
35 Hills, Manokotak, Aleknagik, Dillingham, Clark's Point
36 and Ekuk regardless of the population size of the
37 Nushagak Peninsula Caribou Herd. The recommendation is
38 to oppose.

39

40 Wildlife Closure Review 26-07 reviews
41 the Federal public lands closure in portions of Unit
42 17A and 17C to the taking of caribou except by
43 Federally-qualified subsistence users unless the
44 Nushagak Peninsula Caribou Herd population estimate
45 exceeds 900 caribou. The recommendation is to retain
46 status quo.

47

48 WP26-46 requests to increase the
49 harvest limit for ptarmigan in Unit 18 from 15
50

0741

1 ptarmigan per day, 30 in possession to 25 ptarmigan, 50
2 in possession. The recommendation is to support.

3

4 WP26-52 requests to align the harvest
5 limit and season length for brown bear in Unit 22 with
6 State regulations. The recommendation is to support.

7

8 WP26-55 and 56 requests to extend the
9 fall season dates and establish a winter season for
10 moose in a portion of Unit 22A. WP26-55 also requests
11 requiring a State registration permit. The
12 recommendation is to support WP26-55 and to take no
13 action on WP26-56.

14

15 WP26-57 requests to establish a Federal
16 registration moose permits in Unit 22A, that portion
17 north of the Egavik Creek drainage and Unit 22A
18 Remainder. The recommendation is to oppose.

19

20 WP26-58 requests to eliminate the
21 Federal moose permit FM2202 and to change the harvest
22 limit from one bull to one antlered bull for the winter
23 moose hunt in Unit 22B west of the Darby Mountains.
24 The recommendation is to support.

25

26 WP26-59 requests to shift the fall
27 moose season in Unit 22B west of the Darby Mountains
28 from September 1st to the 14th to September 6th to
29 20th. The recommendation is to oppose.

30

31 WP26-60 request to align State and
32 Federal regulations for moose in Unit 22D. The
33 recommendation is to support.

34

35 WP26-62a requests that the Board
36 recognize the customary and traditional use of muskoxen
37 in Unit 22A by residents of St. Michael, Shaktoolik,
38 Stebbins, and Unalakleet. The recommendation is to
39 support as modified by OSM.

40

41 WCR26-09a reviews the closure to moose
42 hunting by non-Federally-qualified users from September
43 21st to October 31st in the northern portion of Unit
44 22A. WCR26-09c reviews the closure to moose hunting by
45 non-Federally-qualified users from October 1st to
46 October 31st in Unit 22A Remainder. The recommendation
47 is to rescind both of these closures.

48

49 Wildlife Closure Review WCR26-16

50

0742

1 reviews a closure to the harvest of moose by non-
2 Federally-qualified users in Unit 22E. The
3 recommendation is to retain status quo.

4
5 WP26-67 requests to extend the trapping
6 season for muskrat to yearround in Unit 23 to match
7 State regulations. The recommendation is to support.

8
9 WP26-68 requests to increase the
10 harvest limit and extend the season for ptarmigan in
11 Unit 23 to match State regulations. The recommendation
12 is to support.

13
14 WP26-68 requests to increase the
15 harvest limit and extend the season for ptarmigan in
16 Unit 23 to match State regulations. The recommendation
17 is to support.

18
19 WP26-70 requests allowing the sale of
20 handicrafts and incorporate any non-edible parts of
21 black bear except gall bladders from black bears
22 harvested Units 20E, 25A and 25B. The recommendation
23 is to support.

24
25 WP26-71 requests increasing the harvest
26 limit for brown bear in Unit 12 to two bears. The
27 recommendation is to support.

28
29 WP26-72b requests increasing the
30 harvest limit for brown bear in Unit 22E to two bears.
31 The recommendation is to support.

32
33 WP26-73 requests an increase in the
34 harvest limit for brown bears in Unit 25B to two bears.
35 The recommendation is to oppose.

36
37 WP26-74 requests that the Board
38 recognize the customary and traditional uses of sheep
39 in Unit 12 by residents of Chitina and Kenny Lake. The
40 recommendation is to oppose.

41
42 WP26-78 requests changing the boundary
43 between Units 25C and 25D to align with Federal
44 regulations. The recommendation is to support.

45
46 WCR26-22 reviews the closure to moose
47 hunting in Unit 25D West except by residents of 25D
48 West and Birch Creek. The recommendation is to retain
49 the status quo.

50

0743

1 WCR26-25 reviews the closure in Unit
2 26C to the harvest of muskox except by residents of
3 Kaktovik. The recommendation is to retain the status
4 quo and clarify regulatory language as recommended by
5 OSM.

6
7 (Laughter and applause)

8
9 MS. GREDIAGIN: So thank you, Mr.
10 Chair, that concludes the consensus agenda and I would
11 also like to take this opportunity to give a big thank
12 you to all of the OSM analysts for their great work on
13 analyzing and presenting all the proposals and closure
14 reviews.

15
16 (Applause)

17
18 MS. GREDIAGIN: I'd also like to take
19 this opportunity to give a big thank you for Robbin for
20 her super woman coordination of this entire meeting as
21 well as the entire OSM Team for all their assistance
22 and support in putting on this meeting.

23
24 Thank you, Mr. Chair.

25
26 (Applause)

27
28 CHAIRMAN CHRISTIANSON: Thank you for
29 being a machine gun today.

30
31 (Laughter)

32
33 CHAIRMAN CHRISTIANSON: We're firing on
34 all cylinders at 8:30. The consensus agenda as
35 presented by Staff.

36
37 MS. JOHN: Mr. Chairman.

38
39 CHAIRMAN CHRISTIANSON: Yes, you have
40 the floor.

41
42 MS. JOHN: The Bureau of Indian Affairs
43 really appreciates everything that the Staff, the
44 committees, the Fish and Game for thank goodness having
45 a consensus agenda, otherwise we would have been here
46 for a few more days. That was a lot of hours of work
47 that everyone put into that and in careful evaluation.

48
49 So BIA moves to accept the actions for
50

0744

1 the 2026/2028 Federal Subsistence Wildlife Regulatory
2 Proposals and closure reviews as listed on the
3 consensus agenda and as described in the associated
4 documents.

5

6 MR. INGERSOLL: Forest Service seconds.

7

8 CHAIRMAN CHRISTIANSON: Motion been
9 made and seconded to accept the consensus agenda as
10 presented and read into the record. Hearing or seeing
11 no more further deliberation, is there any opposition
12 to the consensus agenda as presented.

13

14 (No opposing votes)

15

16 CHAIRMAN CHRISTIANSON: Hearing none,
17 motion carries unanimously to accept the consensus
18 agenda as presented. Thank you.

19

20 Oh, they said to do the shark one.

21

22 (Makes sound)

23

24 CHAIRMAN CHRISTIANSON: Oh, that's how
25 it goes, no, I'm off sorry.

26

27 (Laughter)

28

29 CHAIRMAN CHRISTIANSON: RFR25-01.....

30

31 MS. LEONETTI: And 02.

32

33 CHAIRMAN CHRISTIANSON:and 02.

34

35 MR. ROBERTS: Good evening, Mr. Chair.
36 Members of the Board. I'm Jason Roberts an
37 Anthropologist at OSM. RFR25-01 and -02 requests that
38 the Board reconsider its decision to adopt NDP25-01.
39 This decision changed the status of the Ketchikan area
40 from non-rural to rural within the Federal Subsistence
41 Management Program. The Board's decision on this
42 proposal went into effect when it was published in the
43 Federal Register on July 18th, 2025. Due to the
44 inclusive nature of customary and traditional use
45 determinations in the Southeast region, Ketchikan
46 residents immediately became Federally-qualified
47 subsistence users for most resources in Units 1 through
48 5 following this change in rural status.

49

50

0745

1 Moving on to a bit about the process
2 here.

3
4 So request for reconsideration first go
5 through this administrative process in which the Board
6 determines if the request for reconsideration meets the
7 regulatory threshold for the Board to reconsider its
8 decision and that's what the Board is deciding right
9 now. There is no public process at this stage. If the
10 Board determines that all or part of a request for
11 reconsideration meets the criteria set forth in
12 regulation then OSM will initiate a public process on
13 the request and provide further information on the
14 steps and the process and issues to be discussed based
15 on direction from the Board. This process should occur
16 over the next regulatory cycle during which time the
17 Southeast Council, tribal and ANCSA organizations, the
18 State and the public will have opportunities to provide
19 input on the request for reconsideration and the Board
20 would consider all of this input and make a final
21 decision most likely at its 2027 regulatory meeting.

22
23 So by regulation, the Board will accept
24 a request for reconsideration only if it means at least
25 one of the following criteria on that slide there. The
26 request is based upon information not previously
27 considered by the Board. The request demonstrates that
28 the existing information used by the Board in its
29 decision is incorrect, and/or the request demonstrates
30 that the Board's interpretation of information,
31 applicable law or regulation was in error or contrary
32 to existing law. And it's the proponent's
33 responsibility to provide sufficient evidence to
34 demonstrate that the request meets at least one of
35 these criteria.

36
37 So moving on to the next slide.

38
39 So OSM received two requests for
40 reconsideration. One from the Craig Tribal Association
41 and one from Shaan Seet Incorporated. Both requests
42 for reconsideration were identical, there were no
43 differences in the claims or supporting information
44 provided. The RFRs make seven distinct claims. Each
45 claim appears to target threshold criterion three
46 stating that the Board's interpretation of information,
47 applicable law, or regulation was in error or contrary
48 to existing law. One of the claims also appears to
49 target threshold criterion one that the claim is based
50

0746

1 on information not previously considered by the Board.

2

3 The proponents request for
4 reconsideration and supporting information can be found
5 in your supplementary materials book as well as on our
6 website under the supplementary materials heading. The
7 Board has been provided with these materials as well as
8 background information on the Ketchikan rural
9 determination made in 2025.

10

11 OSM did not provide a specific
12 recommendation to the Board on whether the request for
13 reconsideration meet the threshold criteria. This
14 concludes the Staff presentation.

15

16 Thank you.

17

18 CHAIRMAN CHRISTIANSON: Thank you for
19 that and I believe -- so, yeah, now we're open for
20 Board motion, discussion and action. And yesterday we
21 did have an executive session to look at this and I
22 think Robbin has the floor for a second.

23

24 MS. LAVINE: Thank you, Mr. Chair.
25 Last night there was an executive session of the full
26 Board that has been present for this entire meeting,
27 some members of the ISC, the OSM or Federal Subsistence
28 Management Program solicitor and some OSM Staff. This
29 was an opportunity for the solicitor to provide
30 guidance and an overview of requests for
31 reconsideration in regulation and it was a good
32 discussion. We stayed longer than I think we would
33 have wished and that's it. Thank you, Mr. Chair.

34

35 CHAIRMAN CHRISTIANSON: Thank you.
36 Appreciate that Robbin. With that we have this ahead
37 of us, looking for a Board to make a motion to this
38 request.

39

40 MR. INGERSOLL: Mr. Chair.

41

42 CHAIRMAN CHRISTIANSON: You have the
43 floor.

44

45 MR. INGERSOLL: Forest Service moves to
46 accept the request for reconsideration and refer them
47 to Staff for further consideration. If I get a second
48 I'll explain why I intend to support my motion.

49

50

0747

1 MR. VICKERS: BLM seconds.

2

3

4 MR. INGERSOLL: I support my motion
5 based on the questions around the information not
6 previously considered by the Board and specifically
7 whether formal statements by Federally-recognized
8 tribal governments containing traditional ecological
9 knowledge were fully provided to the Board and
10 considered by the Board in their previous decision.

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Thank you.

CHAIRMAN CHRISTIANSON: I see concern
down here, we got a motion and second -- you're making
a motion to accept?

MR. INGERSOLL: Correct.

CHAIRMAN CHRISTIANSON: Okay. Just
making sure there's clarification, I seen some
questions in eyes here. Okay, there's a motion on the
floor here to accept the RFR, the Forest Service
seconded it [sic]. Further discussion or deliberation
before we go to a vote.

(No comments)

CHAIRMAN CHRISTIANSON: This is it, we
have a motion on the floor. Like I said a lot of us --
all right, roll call, please.

MS. LEONETTI: Okay, the motion is to
accept Request for Reconsideration 25-01-02 and refer
it to Staff for analysis.

Forest Service Member Ingersoll.

MR. INGERSOLL: Support.

MS. LEONETTI: BLM Member Vickers.

MR. VICKERS: BLM opposes. When we
considered NDP25-01 in February 2025 the Board did not
receive the tribes letters and resolutions containing
information TEK on Prince of Wales deer population and
harvest trends, yet the content for the letters and
resolutions was considered by the Board in acting on
NDP25-01. Southeast Alaska Council recommendation
noted that potential impacts on Unit 2 resources was a

0748

1 factor in its opposition to the proposal, the
2 InterAgency Staff Committee stated that the deer
3 potential for overharvest shouldn't be considered a
4 factor in determining rural characteristics of a
5 community. Several Board members mentioned potential
6 overharvest of deer in their justifications and asked
7 questions of Staff during discussions.

8

9 Therefore, while the tribes resolutions
10 should have been given to the Board, the claim does not
11 meet the threshold of criterion one because information
12 in the TEK resolutions was information previously
13 considered by the Board.

14

15 MS. LEONETTI: Park Service Member
16 Striker.

17

18 MR. STRIKER: Park Service is opposed
19 for the reasons so well articulated by my colleague
20 from the BLM.

21

22 MS. LEONETTI: Fish and Wildlife
23 Service Member Boario.

24

25 MS. BOARIO: Fish and Wildlife Service
26 is opposed similar to my colleague with BLM,
27 specifically regarding criterion one. Tribal
28 resolutions and letters are important and I am glad to
29 have received them and have read through them for this
30 request for reconsideration. I find that the
31 information within them was summarized for and
32 considered by the Board during our decisionmaking
33 process last year. Further, regarding criterion two
34 and three, I don't believe there is a demonstrated
35 legal error with regard to ANILCA's requirements
36 relating to the subsistence priority and ANILCA .810.
37 Likewise, I don't think there is a demonstrated
38 violation of the Administrative Procedure Act. I think
39 the Board properly considered the factors in its non-
40 rural determination policy, a policy that was revised
41 after an extensive multi-year public process. Revised
42 regulations for the rural determination process were
43 published in the Federal Register in 2015 and the Board
44 officially adopted the new policy in 2017. This new
45 policy removed specific guidelines for rural
46 determinations including requirements regarding
47 population and instead took a comprehensive approach
48 that considers many factors which the Board did.

49

50

0749

1 Thank you.

2

3 MS. LEONETTI: BIA Member John.

4

5 MS. JOHN: The BIA votes to oppose the
6 motion and to not consider further action on the
7 request for reconsideration that were submitted to the
8 Federal Subsistence Board by the Craig Tribal
9 Association and Shaan Seet Incorporated pertaining to
10 the Board's 2025 decision to designate the Ketchikan
11 area as rural.

12

13 We do not feel that these RFRs should
14 be accepted for threshold analysis because they are not
15 based upon information not previously considered by the
16 Board, do not demonstrate that the information used by
17 the Board is incorrect, nor do they demonstrate that
18 the Board's interpretation of information applicable
19 law or regulation is in error or contrary to existing
20 law.

21

22 We greatly appreciate the traditional
23 and local knowledge about subsistence practices on
24 Prince of Wales Island that has been provided to the
25 Southeast RAC and the Board during this rural
26 determination process. BIA also acknowledges the
27 tribes and the corporations ongoing concerns regarding
28 the ability of Unit 2 residents to meet their deer
29 subsistence needs. The Board has worked with the
30 Southeast RAC to implement regulations and have
31 continued to address them during this meeting.

32

33 Gunalcheesh. Haw'aa. To the Craig
34 Tribal Association and Shaan Seet Incorporated and
35 others for the dedicated efforts to help the Prince of
36 Wales rural residents your important cultural
37 traditions.

38

39 MS. LEONETTI: Public Member Pitka.

40

41 MS. PITKA: I vote to oppose the motion
42 to accept the reconsideration. Based on a lot of the
43 discussion already put forward, we had exhaustive
44 discussions about the Ketchikan rural determination
45 during our last Board meeting, we took into account a
46 lot of traditional ecological knowledge. We spent a
47 lot of time on this. We listened very carefully to the
48 Southeast Regional Advisory Council and all of their
49 exhaustive work on this. We went through the entire

50

0750

1 public process and it felt like we were there for days.
2 I felt like we had a very detailed discussion based on
3 those parameters.

4

5 Thank you.

6

7 MS. LEONETTI: Public Member Oney.

8

9 MR. ONEY: Public Member Ray Oney moves
10 to oppose as articulated by BLM.

11

12 MS. LEONETTI: Public Member Woods.

13

14 MR. WOODS: Public Member Woods moves
15 to oppose to the lengthy conversations and thresholds
16 that were used to come to the decision. We were
17 working under pretty long days and a lot of information
18 but in that regard I think we did due diligence and
19 this Board acted appropriately and for that, and along
20 with the reasons of BLM and other members that just
21 stated, I oppose to bringing this to reconsideration.

22

23 MS. LEONETTI: Public Member Payenna.

24

25 MR. PAYENNA: I would have to agree
26 with comments submitted prior to me by BLM, BIA and the
27 Fish and Wildlife Service and oppose the motion.

28

29 MS. LEONETTI: Chair Christianson.

30

31 CHAIRMAN CHRISTIANSON: I support the
32 proposal as stated by the U.S. Forest Service, as one
33 of the original dissenters of this, you know, and
34 supporting the rural residents of Prince of Wales
35 Island in the initial and will continue to do that,
36 thank you. And in deference to the RAC and the 7 to 3
37 vote that they made in this and describing what rural
38 and non-rural looks like in the region that they so
39 diligently and so charismatically represent and do
40 exactly like we do here, exhaust all avenue and work
41 through the system until they figure it out, and so
42 hat's off to you guys and thank you to the Forest
43 Service for that motion.

44

45 MS. LEONETTI: Mr. Chair, the motion
46 fails two in favor, eight opposed.

47

48 CHAIRMAN CHRISTIANSON: Thank you.
49 Appreciate everybody with that. I think we have one
50

0751

1 more thing on our agenda.

2

3 MS. LEONETTI: Council correspondence.

4

5 CHAIRMAN CHRISTIANSON: Council
6 correspondence, yes, or what is next.

7

8 MS. LEONETTI: Council correspondence
9 is going to -- Robbin.

10

11 MS. LAVINE: The Council correspondence
12 to the Board, this is just an update and if you all
13 look in front of you I have passed out the -- actually
14 I've already passed out the spreadsheets. The
15 spreadsheets in front of you document the
16 correspondence to the Board or through the Board to the
17 Secretaries and to some of the Board agencies and where
18 these correspondences are in regards to replies, right.
19 So I do want you to note that the letters from
20 Southeast regarding wolves is pending and should be
21 coming before you soon. I want you guys to keep your
22 eyes open for some of these new letters that start with
23 the call number 2026, you will be working through your
24 ISC member to begin to consider responses and actions
25 in regards to these letters. And you will be
26 addressing this correspondence along with annual
27 reports and your Board replies during the summer work
28 session.

29

30 CHAIRMAN CHRISTIANSON: I don't speak
31 Yup'ik, I speak Haida.

32

33 (In Native)

34

35 CHAIRMAN CHRISTIANSON: And it's a good
36 day to be here. Next. WP25-02 Unuk River.

37

38 MR. CROSS: Thank you, Mr. Chair. For
39 the record my name is Robert Cross with the Forest
40 Service. Federal Fisheries Proposal 25-02 can be found
41 in Volume III on Page 1467 of your meeting book and
42 requests closing the Federal waters of the Unuk River
43 to non-Federally-qualified users.

44

45 The proponent, the Southeast Alaska
46 Regional Advisory Council states that a closure to non-
47 Federally-qualified users will help the Unuk River
48 eulachon population recover while continuing to provide
49 harvest opportunities to Federally-qualified
50

1 subsistence users. In 2005 the eulachon population in
2 District 1 containing the Unuk River collapsed
3 resulting in State and Federal closures to eulachon
4 fishing between 2005 and 2020. A limited Federal
5 subsistence fishery occurred on the Unuk River from
6 2021 to 2025 for Federally-qualified subsistence users
7 and will occur again in 2026. All closures since 2005
8 for District 1 eulachon harvest have been conducted
9 using in-season management actions. If this proposal
10 is adopted it would set into regulation the special
11 actions that the Federal in-season managers have been
12 implementing on a yearly basis.

13

14 This system has an active monitoring
15 project for eulachon escapement. From 2005 to 2009
16 less than 100 fish were observed in the Unuk River
17 system. From 2011 to present eulachon were observed in
18 both the Unuk River and other nearby areas in Unit 1
19 but numbers have been variable and remain much lower
20 than those observed prior to 2005, or prior to the
21 collapse. Due to the upcoming of Ketchikan's non-rural
22 status, this proposal was deferred by the Federal
23 Subsistence Board in the last fisheries cycle so that
24 the Southeast Regional Advisory Council could take into
25 account this large change to the basis on which the
26 proposal was submitted and deliberated. Now that
27 Ketchikan is a rural community this closure would have
28 very minimal affect to reducing harvest within this
29 fishery.

30

31 The OSM conclusion is to support
32 Proposal FP25-02 with modification to close all Federal
33 public waters of District 1 to the harvest of eulachon
34 except by Federally-qualified subsistence users in the
35 Unuk River. The general cycle for eulachon is roughly
36 five years for their lifespan, therefore, while the
37 recent increases in returns are encouraging we're
38 hoping to see improved returns over a generational
39 cycle before we increase harvest. Further, public
40 comments highlighted that the current five gallon per
41 household annual limit is far below subsistence harvest
42 needs in most households, therefore, restricting non-
43 Federally-qualified users is the first step in
44 providing subsistence priority for this resource and
45 continued reduced returns or increased harvest may
46 necessitate a future .804 restriction.

47

48 And that's the end of my presentation.

49

50

1 CHAIRMAN CHRISTIANSON: Thank you, Mr.
2 Cross. Any summary of written public comment.

3
4 MR. CROSS: One public comment was
5 received on this proposal during the initial public
6 comment period in 2024 and it can be found in Tab 4 of
7 your supplemental materials. The comment from the
8 coordinator of the Tongass Women for the Forest was
9 neutral on FP25-02. It expressed concerns that were
10 outside of the scope of the Federal Subsistence
11 Management Program.

12
13 CHAIRMAN CHRISTIANSON: Thank you, Rob.
14 Summary of tribal, ANCSA Corporations consultations.
15 Orville.

16
17 MR. LIND: Thank you, Mr. Chair. There
18 were none. Thank you.

19
20 CHAIRMAN CHRISTIANSON: Thank you,
21 Orville. Tribal, Native organization testimony.

22
23 Gloria.

24
25 MS. BURNS: Yeah, I guess I just wanted
26 to make a comment. The Unuk River is important to the
27 customary and traditional food usage of the Ketchikan
28 Indian community. We've been doing a great deal of
29 monitoring on that river. I do want to express that
30 Louie Wagner, who sits on the RAC from Metlakatla,
31 who's actually Tongass, he's actually a Tlingit from
32 the Ketchikan area, had expressed that the eulachon
33 came in really, really, really thick and were missed by
34 Mr. Hyde, that he left and the eulachon came in and it
35 was like the old days, you could walk across it and so
36 there has to be some change in how we're getting this
37 data. And I want to say that the way that it's being
38 managed as far as subsistence use is not in line with
39 the customary and traditional way in which the people
40 of Ketchikan and Metlakatla traditionally got eulachon
41 in that area. It's a dangerous river, nobody takes
42 their boat up by themselves and scoops out one bucket
43 of eulachon. The way that eulachons have always been
44 harvested in a traditional customary way for us is that
45 a couple of boats who knew how to do it went up, they
46 got the eulachon and then they would come to Ketchikan,
47 you would then bring your buckets to the boat, you
48 would grab your eulachons out of the boat at spring and
49 you would take and put it up and you'd give the boat
50

1 captain some cash, right, and for essentially gas. And
2 then they would go ahead, I think they also went over
3 to Prince of Wales at one time and did that and then
4 they would bring it to Metlakatla and do that. And so
5 when we're talking about the idea that -- you know, and
6 so I agree, you know, limit to non-Federally-qualified
7 users but it is never going to meet the need of the
8 subsistence user because we're not harvesting it the
9 way the subsistence user harvested it. And so I look
10 forward to us submitting a proposal that meets the
11 needs because the reality is one bucket does not meet
12 the needs and we're not actually seeing what's going on
13 in that area.

14
15 And so I think this continued
16 conversation as though one bucket for people who never
17 go up there is ridiculous because it's not the way in
18 which way we harvested it ever and so forcing us to
19 harvest like people -- it doesn't make any sense and I
20 just wanted to say that because it continues to
21 frustrate both Ketchikan and Metlakatla about the way
22 in which we're looking at that resource.

23
24 And I want to say my Noni's turning 97
25 this year, she knows the difference between an eulachon
26 from the Unuk River and an eulachon from the Stikine or
27 one of these big fat eulachon from Anchorage and she
28 wants to eat an eulachon from the Unuk River. She
29 likes the way the eggs taste, she likes the way the
30 tail is, I know the head's pretty good too, but she
31 knows exactly when you try to pawn off a Stikine River
32 eulachon or an eulachon from Anchorage on her and it's
33 a taste that she wishes for constantly. And we
34 maintain that the resource is close, we know you have
35 to have that five, you know, that five years to know
36 that it's abundant but we do have concerns in the way
37 that the idea that we're ever going to harvest it in
38 the way that's being proposed.

39
40 CHAIRMAN CHRISTIANSON: Thank you.
41 Appreciate your testimony. Any other tribal, Native
42 organization like to speak.

43
44
45 (No comments)

46
47 CHAIRMAN CHRISTIANSON: Hearing or
48 seeing none, tribal, Advisory group testimony, State,
49 AC, SRC, working group.

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(No comments)

CHAIRMAN CHRISTIANSON: Hearing and seeing none, anybody in the public would like to speak to this proposal, online or in the house, raise your hand.

(No comments)

CHAIRMAN CHRISTIANSON: Thank you. Hearing none or seeing none, Regional Advisory Council Chair recommendation on this.

MR. HERNANDEZ: Thank you, Mr. Chairman. Don Hernandez, again, for the Southeast RAC. The Council voted to support with a modification to the proposal to prohibit closing Federal -- prohibit to closing, that doesn't make sense -- proposal to close Federal public waters of the Unuk River to the harvest of eulachon except by Federally-qualified subsistence users harvesting in the Unuk River. Modification would be to close the entire District 1 to the harvesting of eulachons. The Justification in the Southeast Council's intent in submitting the proposal was to protect subsistence use of eulachon population during a time of conservation concern. The proposed action with modification will protect the population by eliminating competing non-subsistence uses. The recommendation was made using both biological information from the Monitoring Program and local knowledge from a long time user on the Council. The proposed closure will be beneficial to subsistence users by providing for a limited harvest and promoting sharing amongst the community while restricting competing non-subsistence uses. The Council believes that this action will not necessarily restrict other uses as there is very little historical use by non-Federally-qualified users such as Juneau residents or non-residents.

Thank you.

CHAIRMAN CHRISTIANSON: Thank you. One question there, you guys said you had a consideration to do the whole unit one?

MR. HERNANDEZ: Yes, thank you. There was some testimony that eulachon, which were believed to, maybe originate in the Unuk River tend to migrate in some years and show up in other river systems and so

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1 in order to protect the whole run we decided it was
2 appropriate to close the entire unit where eulachons
3 may possibly be present from associated with the Unuk
4 River.

5

6 CHAIRMAN CHRISTIANSON: Thank you.
7 Yeah, I knew that, I just wanted to get that on the
8 record as well. Because we see that in other areas, in
9 other rivers, they sometimes just move to an adjacent
10 stream or something for a year because the water
11 quality was not sufficient. So, okay, thank you.

12

13 CHAIRMAN CHRISTIANSON: Alaska
14 Department of Fish and Game's not here.

15

16 Do they oppose, yes. For the record
17 they oppose.

18

19 InterAgency Staff Committee.

20

21 MS. LAVINE: The InterAgency Staff
22 Committee did not provide a new comment to the deferred
23 proposal. Thank you, Mr. Chair.

24

25 CHAIRMAN CHRISTIANSON: Thank you,
26 Robbin. Board discussion, this is your opportunity to
27 ask questions of the Chair, Liaison.

28

29 CHAIRMAN CHRISTIANSON: Hearing and
seeing none we'll open up the floor for Board action.

30

31 MR. INGERSOLL: Mr. Chair.

32

33 CHAIRMAN CHRISTIANSON: You have the
34 floor.

35

36 MR. INGERSOLL: Forest Service proposes
37 to adopt request FP25-02 as modified by the Southeast
38 Council. If I have a second I'll explain my reasons
39 for supporting the motion.

40

41 MR. STRIKER: Park Service seconds.

42

43 MR. INGERSOLL: Thank you. There are
44 some indications that the Unuk River eulachon run is
45 beginning to recover and we are hoping that that
46 recovery continues each year. There continues to be a
47 severe conservation concern and we believe this would
48 be the first step towards providing more subsistence
49 use than we currently are and we first need to close to
50

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1 non-subsistence users in order to be able to support an
2 increased subsistence use when and if, which we hope
3 will be soon, the run recovers.

4

5 Thank you.

6

7 CHAIRMAN CHRISTIANSON: Thank you.
8 Motion on the floor and seconded. Any further debate,
9 discussion, deliberation.

10

11 CHAIRMAN CHRISTIANSON: Hearing and
12 seeing none, any opposition to this motion as
13 presented.

14

15 (No opposing votes)

16

17 CHAIRMAN CHRISTIANSON: Hearing and
18 seeing none motion carries unanimous for reasons stated
19 by the Forest Service.

20

21 MR. INGERSOLL: It was as actually as
22 modified by the Southeast RAC and in deference to the
23 RAC -- sorry.

24

25 CHAIRMAN CHRISTIANSON: Yes, thank you.
26 Thank you for that clarification for the record. So
27 moved.

28

29 MS. LAVINE: The final item on the
30 agenda is just to confirm upcoming Board meetings. The
31 next one will be June 3rd, 2026. The Federal
32 Subsistence Board will meet via teleconference Teams on
33 Wildlife Special Actions 26-01, 02 and 03. August 4th
34 and 5th, 2026 the Federal Subsistence Board will hold
35 its summer work session here in Anchorage to discuss
36 annual reports, Council letters and nominations as well
37 as maybe a few other agenda items. And the Federal
38 Subsistence Board fisheries regulatory meeting is
39 scheduled for the week of February 1st through 5th of
40 2027, venue still to be decided.

41

42 And that is all, thank you, Mr. Chair.

43

44 MR. STRIKER: Mr. Chair, quick
45 question. Did we learn who won the art competition?

46

47 MS. LAVINE: Mr. Chair, we did, and for
48 awhile we had two winners, the first and the second
49 listed at the back and I do not recall their names but

50

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1 the very first one was a beautiful picture of a sheep,
2 dall sheep, yes. And then the second was a beautiful
3 picture of two caribou and all of them were stunning
4 and so the great thing is also that the remainder of
5 the artwork that you actually saw will go into
6 different locations in the next wildlife handbook.

7

8 Thank you.

9

10 CHAIRMAN CHRISTIANSON: Entertain a
11 motion to adjourn.

12

13 MS. PITKA: I make a motion to adjourn.

14

15 CHAIRMAN CHRISTIANSON: Is there a
16 second.

17

18 MS. BOARIO: Fish and Wildlife Service
19 seconds.

20

21 CHAIRMAN CHRISTIANSON: Full
22 concurrence, adjourn.

23

24 (No opposing votes)

25

26 CHAIRMAN CHRISTIANSON: Good job
27 everybody. Appreciate all the hard work by the Staff,
28 what a dedicated team, Haw'aa.

29

30 (Off record)

31

32 (END OF PROCEEDINGS)

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