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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

Recorded and transcribed by:  
Computer Matrix Court Reporters  
329 F Street, Suite 222  
Anchorage, AK 99501  
907-227-5312; sahile@gci.net

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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

0557

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

0558

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

0560

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

0561

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

0562

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

0564

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

50

0565

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

0567

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

50

0568

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.

50

0569

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.

9

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

16

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

42

43 I've been sitting there listening,  
44 wondering why people can talk about non-agenda items.  
45 I've respected that until now. When every day public  
46 testimony talks about agenda items. I'll be clear of  
47 that. The comments about fishing isn't about a rural  
48 priority, fishing is a State fishery where we have to  
49 buy a license or get a permit to harvest sockeyes, the  
50

0570

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  
50

0571

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

50

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?

50

0573

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

11  
12 For our community, customary and  
13 traditional use is not theoretical, it is how we feed  
14 our families, how we teach our children, and how we  
15 maintain our cultural identity. Federal protections  
16 under the Alaska National Interests Lands Conservation  
17 Act exist because Congress recognized that rural and  
18 Alaska Native communities require a priority, not just  
19 equal footing, to continue this way of life. For  
20 Alaska Native people customary and traditional use is  
21 not simply access to resources, it is the exercise of  
22 inherent rights and responsibility to pass knowledge,  
23 stewardship and food security from one generation to  
24 the next.

25  
26 The current proposals would require  
27 deference to the State of Alaska on conservation  
28 matters, curtail the Board's temporary special action  
29 authority and fundamentally undermine the rural  
30 priority established under ANILCA. We view these  
31 proposals as a direct attack on subsistence rights of  
32 Alaska Native people and rural Alaskans. Congress  
33 created the Federal Subsistence Program because the  
34 State of Alaska cannot constitutionally implement  
35 ANILCA's rural priority as affirmed in McDowell v.  
36 State, the Katie John cases, and most recently, the  
37 United States v. Alaska. The State has had more than  
38 three decades to amend its Constitution and has chosen  
39 not to. Any management authority back to the State or  
40 weakening the Board and the Office of Subsistence  
41 Management would betray the original intent and the  
42 Federal trust responsibility. Removing public seats  
43 removes a lived experience of people on the land from  
44 the decisionmaking process. Limiting special actions  
45 restricts the Board's ability to respond to realtime  
46 conditions that directly affect our access, our safety,  
47 and our food security. Taken together, these changes  
48 move decisionmaking further away from communities most  
49 impacted and toward outside interests that do not rely  
50

0575

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

17

18

Thank you.

19

20

21

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

22

23

24

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

25

26

27

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29

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31

32

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.

33

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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

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.

0578

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

50

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

50

0581

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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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

0593

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

0595

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

0596

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

0597

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 CHAIRMAN CHRISTIANSON: Thank you,  
27 Judy. Any questions.

28

29 (No comments)

30

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

33

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

50

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

11 CHAIRMAN CHRISTIANSON: Go ahead.

12

13 MS. PITKA: At this time I'd just like  
14 to state on the record that I'll be absent for about an  
15 hour and a half this afternoon and during that time I  
16 would like to give my proxy to Public Member Frank  
17 Woods to vote in deference to the Regional Advisory  
18 Council and also in recognition if there's any new  
19 information presented he withhold voting my proxy.  
20 Thank you.

21

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

25

26 (Laughter)

27

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

30

31 (Laughter)

32

33 CHAIRMAN CHRISTIANSON: You've got the  
34 floor Brian.

35

36

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

43

44 Proposal WP26-22 is one of five  
45 proposals submitted by the Cooper Landing Safe Trails  
46 Committee which requests trapping setbacks from  
47 designated roads, trails, beaches and campgrounds in  
48 the Cooper Landing area. WP26-22 specifically requests  
49 establishing setback distances of 100 yards from  
50

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

0612

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

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

9

10

11

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

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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Thank you.

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CHAIRMAN CHRISTIANSON: Thank you, Judy. Eastern Interior.

41

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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

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

9

10 CHAIRMAN CHRISTIANSON: Thank you.

11

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

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

(Off record)

(On record)

CHAIRMAN CHRISTIANSON: Good afternoon.  
That was a refreshing lunch break. Before we get  
started with the next proposal we're going to have  
Robbin give a little update on something.

UNIDENTIFIED SPEAKER: A student art  
contest.

MS. LAVINE: Thank you, Mr. Chair. For  
those of you -- our Board members, our Council Chairs  
and representatives and our ISC members, for those of  
you that have voting slips in your meeting materials  
this is your last opportunity to vote on the student  
art contest. Please do so within the next hour and get  
your voting form to Caron McKee. Hopefully we can  
tally and announce the winners before we adjourn.

Thank you.

CHAIRMAN CHRISTIANSON: Thank you,  
Robbin. WP26-27.

MS. LAVINE: Mr. Chair, WP26-27 was  
withdrawn.

CHAIRMAN CHRISTIANSON: WP26-28.

1 MS. HOLMAN: Mr. Chair, Members of the  
2 Board. For the record Kendra Holman, Wildlife  
3 Biologist with OSM. This is a summary of the analysis  
4 for Wildlife Proposal WP26-28a that can be found  
5 starting on Page 847 of your meeting book.

6  
7 This proposal was submitted by the  
8 Southcentral Alaska Regional Advisory Council  
9 requesting to extend the closing date of the moose  
10 season in Unit 11 to September 30th. The proponent  
11 states that this proposal would extend the moose season  
12 to compensate for changes in climate and allow for  
13 additional harvest opportunity and provide a  
14 subsistence priority.

15  
16 There have been many regulation changes  
17 since the Federal regulations were established in 1992.  
18 Most recently in July of 2020 the Board adopted with  
19 modification temporary -- oh, sorry. Ignore that one.  
20 I added something in there I shouldn't have.

21  
22 In 2022 the Board established a  
23 community harvest system for moose and caribou in Units  
24 11 and 13 administered by the Ahtna Intertribal  
25 Resource Commission by adopting deferred proposal  
26 WP18-19.

27  
28 The moose population has been  
29 considered low density across Unit 11 for many years.  
30 High brown bear and wolf numbers in Unit 11 may  
31 contribute to the low calf:cow ratios observed in this  
32 unit, as well as the overall low, but stable density  
33 moose population.

34  
35 The State management objective for Unit  
36 11 is to maintain a population with a post hunt -- post  
37 fall hunt minimum bull:cow ratio of 30 bulls:100 cows.  
38 ADF&G conducts aerial surveys along the western slope  
39 of Mt. Drum in Unit 11 about every other year to  
40 determine population and composition trends. While this  
41 survey area only comprises a small portion of Unit 11,  
42 it is a long-term consistent data set and provides an  
43 index for moose status in Unit 11 unit-wide. This can  
44 be found on Table 1 of Page 855 of your meeting book.

45  
46 With low hunting pressure, limited  
47 access and relatively low levels of predator harvest  
48 the moose population is expected to remain at a  
49 relatively stable but low density. Bull:cow ratios  
50

0632

1 remain well above management objectives while other  
2 matrixes remain stable.

3  
4 Wrangell-St. Elias conducts periodic  
5 moose surveys across Unit 11 and portions of Unit 12.  
6 The results of these surveys can be found on Table 2 on  
7 Page 855 of your meeting book. The most recent survey  
8 results established a record low number of moose at an  
9 almost 40 percent decline from the previous survey,  
10 which was in 2013.

11  
12 Harvest from 2000-2024 the moose  
13 averaged 55 per year, which included an estimated 10  
14 unreported harvested. Harvest information can be found  
15 on Table 3 of Page 858 of your meeting book.

16  
17 From 2014-2024 Federal permits FM1106  
18 and FM1107 averaged 15 percent success rate and the  
19 joint Federal/State permit RM291 averaged a 16 percent  
20 success rate. Figure 1 on Page 857 of your meeting  
21 book shows the moose harvest during each week of the  
22 general season, State harvest ticket in Unit 11  
23 Remainder. Specifically on average 58 percent of the  
24 harvest occurs during the last two weeks of the season.

25  
26 While this proposal increases  
27 subsistence opportunity there is a conservation concern  
28 for the Unit 11 moose population, which has declined  
29 substantially in recent years. Increasing harvest in  
30 Unit 11 moose population is not recommended at this  
31 time. The OSM conclusion is to oppose this proposal.

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

35  
36 CHAIRMAN CHRISTIANSON: Thank you. Any  
37 questions for Staff on this one?

38  
39 MR. PENDERGAST: Mr. Chair.

40  
41 CHAIRMAN CHRISTIANSON: You have the  
42 floor.

43  
44 MR. PENDERGAST: Kevin Pendergast, BLM.  
45 I've heard and read the statement moose population has  
46 declined substantially in recent years. I'm trying to  
47 find out where can I find that information in the book  
48 other than just a statement? I'm looking at Table 2,  
49 but I don't think that's -- that's just kind of a  
50

0633

1 single number.

2

3 MS. HOLMAN: I have the next three  
4 proposals. I'm opening up the wrong notes to give you  
5 answers. Sorry about that.

6

7 MR. PENDERGAST: Take your time.

8

9 MS. HOLMAN: Mr. Chair. I have it up.  
10 Yeah, it's mostly Table 2 that that information is  
11 coming from. I mean you can see this is the population  
12 surveys from Wrangell-St. Elias National Park and  
13 Preserve. I mean you can see the decline from 2013 to  
14 2023. 2023 is the lowest population count on record.  
15 I mean it's half of what it was in 2013.

16

17 Approximately the calf:cow ratio is  
18 super low in 2023 and the bull:cow ratio, while still  
19 adequate, it's still quite a bit lower than previous  
20 surveys. So while there's not a lot of biological  
21 information, it was a pretty stark difference from 2023  
22 compared to past survey years. Again that's primarily  
23 due to severe winters.

24

25 CHAIRMAN CHRISTIANSON: Any other  
26 questions.

27

28 (No comments)

29

30 CHAIRMAN CHRISTIANSON: Thank you. Was  
31 there any summary of written public comments.

32

33 MS. HOLMAN: Mr. Chair, there was one  
34 written public comment received from the Ahtna  
35 Intertribal Resource Commission. Moose hunting is a  
36 critical subsistence activity for the Ahtna families  
37 across the region and this proposal addresses multiple  
38 barriers currently affecting harvest success. AITRC  
39 recommends continuing use of antlered bull only  
40 provisions as a biological safeguard during this  
41 extended period.

42

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

45

46 MR. LIND: Thank you, Mr. Chair.  
47 During the consultation sessions there was -- AHTNA in  
48 support of that proposal. Thank you.

49

50

0634

1 CHAIRMAN CHRISTIANSON: Thank you.  
2 Tribal/Alaska Native organization testimony. This is  
3 your opportunity to speak.

4  
5 MS. LAVINE: Karen Linnell.  
6

7 MS. LINNELL: Thank you, Mr. Chair.  
8 For the record my name is Karen Linnell. I'm the  
9 Executive Director of Ahtna Intertribal Resource  
10 Commission, which is comprised of the eight Federally  
11 and State recognized tribes within the Ahtna region and  
12 to ANCSA corporations there, the landowners in our  
13 region.

14  
15 We supported this proposal. The early  
16 season is way too warm and just getting out there,  
17 having that extension or later time period is desirable  
18 to get out there. One of the things that we did  
19 discuss, much like I think it's Proposal 28b, with the  
20 extension 28, 29, 30.

21  
22 One was an extension for 10 days and  
23 one was the shifting of five days or shifting of 10  
24 days. That would probably be more preferential as to  
25 shift the season than to extend it, but this is what  
26 was submitted by other folks. We'll just support their  
27 efforts. Having that opportunity is important to meet  
28 subsistence needs.

29  
30 Thank you.

31  
32 CHAIRMAN CHRISTIANSON: Thank you,  
33 Karen. Any other tribal or ANCSA corporation.

34  
35 (No comments)

36  
37 CHAIRMAN CHRISTIANSON: Alaska Advisory  
38 Group, SRC, State Advisory, multi-agency.

39  
40 MS. LAVINE: Mr. Chair. The  
41 Wrangell-St. Elias National Park Subsistence Resource  
42 Commission supported the proposal with modification.  
43 The modification shifts the moose season in Unit 7 to  
44 September 1st until September 30th rather than  
45 extending the season length. This shift in dates keeps  
46 the moose season one month long and addresses concerns  
47 about a warmer August where it is difficult to hunt.

48  
49 Shifting the season in September also  
50

0635

1 provides an opportunity for Federally-qualified  
2 subsistence hunters to avoid competition from State  
3 hunters and to avoid hunting deep into the rut.

4

5 Thank you, Mr. Chair.

6

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

9

10 MS. LAVINE: Mr. Chair. We have Mike  
11 D. in the cue. Mike D., please address the Board.

12

13 MR. MIKE: Thank you, Mr. Chair.  
14 Donald Mike. I'm a private citizen now, P.C. I  
15 support the WP26-28A by Ahtna Intertribal Resource  
16 Commission's comments. I just want to say quickly that  
17 the Ahtna people are the most effective on public lands  
18 in Unit 13 and 11 that are impacted by outside user  
19 groups, particularly sport hunters. So I support the  
20 extended moose season later in the season.

21

22 Thank you, Mr. Chair.

23

24 CHAIRMAN CHRISTIANSON: Thank you,  
25 Donald. Any other public at this time.

26

27 (No comments)

28

29 CHAIRMAN CHRISTIANSON: Hearing, seeing  
30 none. We'll move on to Council recommendation.

31

32 MS. CAMINER: Thank you, Mr. Chair.  
33 Judy Caminer for the Southcentral RAC. We had quite a  
34 discussion on this, as you might as well expect.  
35 People did, as you heard here, reflect on the  
36 difficulties or sort of the not worth our time to hunt  
37 early in the season because of the heat. Because the  
38 leaves are still on the trees makes everything harder  
39 to see.

40

41 So this proposal will lead to increased  
42 harvest success for Federally-qualified subsistence  
43 users and provide a subsistence priority. Currently  
44 the harvest by some users occur at the very end of the  
45 existing hunting season. I think we had a figure of 51  
46 to 58 percent of the moose are taken towards the end of  
47 the season. So extending it allows harvest when the  
48 State season is closed, also giving a bit of a  
49 preference there.

50

0636

1 I also want to emphasize that the  
2 cooler weather makes it a lot easier to care for the  
3 meat in the field. I'd also point out that each of  
4 these are looked at for being under a permit, so there  
5 is some monitoring, if you will, or regulatory actions  
6 associated with that.

7  
8 We also heard that the last time a  
9 successful hunt in this unit got moose -- most people  
10 again got moose at the tail end of the season. We felt  
11 like we needed to balance subsistence opportunity with  
12 the conservation concerns. This provides a priority  
13 when there aren't as many hunters in the field. They  
14 also mention that in the warmer weather moose are not  
15 seen very much moving around.

16  
17 Thank you very much.

18  
19 CHAIRMAN CHRISTIANSON: Thank you,  
20 Judy. Eastern Interior didn't take it up. Alaska  
21 Department of Fish and Game.

22  
23 MR. MULLIGAN: Thank you, Mr. Chair.  
24 For the record the Alaska Department of Fish and Game  
25 opposes the proposal. Just to note, as is typical of  
26 our positions, we support alignment. So when  
27 regulations misalign we do oppose those proposals. As  
28 you also heard from the analysis and seen in the data,  
29 we have seen a decline in the population of moose in  
30 the GMU.

31  
32 Also, just for note, because I didn't  
33 hear it, for your information we are making ANS for the  
34 sub-unit. It is 30 to 40 moose. If you look at the  
35 table that OSM has provided on Page 858, I mean  
36 historically every year they have either been within  
37 range or actually above the upper end of ANS.

38  
39 Thank you, sir.

40  
41 CHAIRMAN CHRISTIANSON: Thank you, Ben.  
42 InterAgency Staff Committee.

43  
44 MS. LAVINE: Thank you, Mr. Chair. If  
45 proposal WP-26-28A is adopted, the closing date of Unit  
46 11 moose season will be extended to September 30th.  
47 This will provide an additional 10 days of hunting  
48 opportunity for Federally qualified subsistence users,  
49 which would provide more of a subsistence priority.

50

0637

1                   Adopting this proposal would also  
2 increase harvest success as bulls are more susceptible  
3 to harvest in late September when they are entering the  
4 rut. Especially given the warmer falls in recent  
5 years, which have been delaying leaf drop, making  
6 animals more difficult to spot and making meat care in  
7 the field more difficult.

8  
9                   The ISC acknowledges the local and  
10 traditional knowledge shared on this proposal that  
11 increasing warmer temperatures affects both moose  
12 activity for successful harvest and ability to safely  
13 preserve meat under warmer conditions.

14  
15                   Public and tribal testimony at the  
16 Federal Subsistence Regional Advisory Council meeting  
17 indicate that many subsistence hunters choose not to  
18 hunt when temperatures are too warm to safely preserve  
19 the meat in the field. This is a deliberative  
20 conservation decision.

21  
22                   If the season were to be extended later  
23 into the fall by 10 days, it is expected harvest will  
24 increase. As data presented in Figure 1 of the  
25 analysis shows the majority of moose are harvested in  
26 the last two weeks of the current season. However,  
27 while this proposal increases subsistence opportunity,  
28 there are conservation concerns for Unit 11 moose,  
29 which have declined substantially in recent years.

30  
31                   Increasing harvest on this population  
32 is not recommended at this time. The most recent moose  
33 survey in Unit 11 occurred in 2023 and indicated an  
34 almost 40 percent decline in the moose population from  
35 the previous survey in 2013. Given the decline, the  
36 Superintendent reduced the winter hunt quota from seven  
37 to five in 2024.

38  
39                   Currently, data indicate that  
40 substantial moose declines occur after heavy snow  
41 years. According to the NRCS snow data on May Creek,  
42 that's site 1096 and Chisana site 1093, this winter,  
43 the winter of 2025-2026, is again one of the snowiest  
44 on record. Therefore, it may be premature to introduce  
45 additional harvest on the declining moose population  
46 that may suffer further from this current winter snow  
47 load.

48  
49                   Wrangell St. Elias National Park and  
50

0638

1 Preserve plans additional moose surveys in 2026. That  
2 information will help inform the current status and  
3 recovery of the moose population and whether it can  
4 sustain additional harvest at this time.

5

6 The addendum alternatively proposed by  
7 OSM to delegate authority to the Wrangell-St. Elias  
8 Superintendent to close the fall moose season in Unit  
9 11 may be an alternative to provide management  
10 flexibility to balance subsistence opportunity with  
11 conservation concerns. However, nimble in-season  
12 decision-making for the Unit 11 hunt is challenging.

13

14 Wrangell-St. Elias staff report that a  
15 large number of hunters participate in the hunt from  
16 around 28 rural communities and they typically stay out  
17 in the field for several days to a week at a time.  
18 This can delay in-season harvest reporting and makes  
19 hunter contact about a closure virtually impossible.  
20 Therefore, a closure date, due date to conservation  
21 concerns would need to be determined pre-season based  
22 on available data at that time and communicated before  
23 the fall moose hunt begins.

24

25 Thank you, Mr. Chair.

26

27 CHAIRMAN CHRISTIANSON: Thank you,  
28 Robbin. Any Board discussion, questions for the  
29 Chairs, State Reps.

30

31 MR. REAKOFF: Mr. Chair.

32

33 CHAIRMAN CHRISTIANSON: Yes, go ahead.

34

35 MR. REAKOFF: Western Interior has  
36 deliberated these kinds of moose proposals before for  
37 Unit 24B. We have these high bull:cow ratios at 44  
38 bulls per 100 cows. There is a harvestable surplus.  
39 So even the Board of Game adopted a proposal that we  
40 submitted to move the season from the 25th of September  
41 to the 1st of October and they adopted the proposal.

42

43 Because the comment that I made was  
44 that from the 20th to the 30th most of the moose that  
45 are moving -- big bulls are what the cows are --  
46 they're ready to breed. The young bulls are moving.  
47 Young one to three-year-old bulls are moving around and  
48 that's what the hunters encounter. I've had to hunt in  
49 that overrun hunt where I live and that's what you see.

50

0639

1 You see one to three-year-old moose.

2

3 This area has 44 bulls per 100 cows.  
4 That's the last survey they had. Their harvest is  
5 actually down from back in 2007, one of their last  
6 dates. They were getting like -- averaging about 20,  
7 25 moose and their harvest is half of that at 13. The  
8 population is about what it was in 2007.

9

10 So I would advocate for my peers at  
11 this table that this -- I do feel that there is a  
12 harvestable surplus. The Ahtna people are -- this  
13 basically would -- they still have harvestable moose.  
14 Those would be younger moose in the population.

15

16 Thank you, Mr. Chair.

17

18 CHAIRMAN CHRISTIANSON: Thank you,  
19 Jack. Hearing and seeing no more questions or  
20 comments. We'll open up the floor for a motion.

21

22 MR. STRIKER: Mr. Chair.

23

24 CHAIRMAN CHRISTIANSON: You have the  
25 floor.

26

27 MR. STRIKER: National Park Service  
28 would like to move to adopt WP26-28a with a Board  
29 modification to establish a may be announced moose  
30 season in Unit 11 from September 21st to the 30th and  
31 to delegate authority to the Wrangell-St. Elias  
32 National Park and Preserve Superintendent to open and  
33 close the season between September 21st and 30th via  
34 delegation of authority letter only. This modification  
35 is designed to help mitigate the conservation concern.

36

37 If I get a second, I'll explain why I  
38 intend to support this motion.

39

40 MR. WOODS: Second.

41

42 MR. STRIKER: Thank you. Thanks for  
43 your patience. There's a lot to get into the record  
44 here. National Park Service supports WP26-28a in  
45 deference to the Southcentral RAC with modification to  
46 establish a may be announced moose season in Unit 11  
47 from September 21st to 30th and to delegate authority  
48 to the Wrangell-St. Elias National Park and Preserve  
49 Superintendent to open and close a season between  
50

0640

1 September 21st to 30th via delegation of authority  
2 letter only. Parenthetically, as is currently in  
3 regulation, the moose harvest would remain one antlered  
4 bull.

5  
6 While the Southcentral Council  
7 supported extending Unit 11 moose season there are  
8 conservation concerns for this moose population. This  
9 alternative provides management flexibility to balance  
10 subsistence opportunity with conservation concerns.  
11 Depending on harvest levels, weather conditions and  
12 moose population estimates the Wrangell-St. Elias  
13 Superintendent in close coordination and consultation  
14 with the State, OSM, the Southcentral Chair, Chugach  
15 National Forest, Ahtna Intertribal Resource Commission  
16 can determine on an annual basis whether to open and  
17 when to close the 10-day fall moose hunt extension  
18 based on the latest available information to provide  
19 for additional subsistence opportunity when possible  
20 and to close to prevent overharvest when there are  
21 conservation concerns.

22  
23 This approach will hopefully allow for  
24 subsistence opportunity while still being able to  
25 manage for the continued health of the moose population  
26 and for the continuation of subsistence into the  
27 future.

28  
29 This proposal would provide a  
30 subsistence priority through the opportunity to extend  
31 the end of the current season by a may be announced 10  
32 days and may lead to increased harvest success for  
33 Federally-qualified subsistence users and provide a  
34 subsistence priority.

35  
36 Currently, harvest by some users as  
37 we've heard occurs at the very end of the existing  
38 hunting season. This extended season will allow the  
39 harvest when the State season is closed, reducing  
40 competition and allowing opportunity for a subsistence  
41 hunt when the cooler weather means moose may be more  
42 active, they may be down and the lower temperatures  
43 will allow for better care of the meat in the field.

44  
45 The Park Service acknowledges the local  
46 and traditional knowledge shared on this proposal that  
47 increasing warm temperatures in recent years affects  
48 both fall moose activity for successful harvest and the  
49 ability to safely preserve meat under warmer  
50

0641

1 conditions.

2

3 Public and tribal testimony that we've  
4 heard indicate that many subsistence hunters choose not  
5 to hunt when temperatures are too warm to safely  
6 preserve the meat in the field and that this is a  
7 deliberative conservation decision. Similar comments  
8 have been shared in the Ahtna Intertribal Resource  
9 Commission comment letter that we heard today.

10

11 Subsistence hunters have expressed that  
12 it is -- there is a conservation concern to harvest  
13 moose in hot weather that's not conducive to preserving  
14 the meat in the field and risking spoilage and  
15 therefore have not attempted to hunt during hot  
16 weather. Extending the season 10 days into the cooler  
17 part of the season may afford the opportunity for  
18 subsistence hunters to harvest at a more appropriate  
19 time.

20

21 NPS has consulted with Wrangell-St.  
22 Elias Park biologists and subsistence Staff on the  
23 options for in-season management. The ISC comment  
24 reports there would need to be a strategy in place to  
25 announce the season opening and closing early enough in  
26 the season based on available data and when messaging  
27 out to hunters is possible prior to them being out in  
28 the field.

29

30 Delegating the authority to the  
31 Wrangell-St. Elias Superintendent to open and close a  
32 may be announced season September 21 to September 30  
33 for fall moose season in Unit 11 can provide management  
34 flexibility to balance the subsistence opportunity with  
35 the conservation concerns.

36

37 Nimble in-season decision-making for  
38 the Unit 11 hunt is challenging as we heard. Staff  
39 report that a large number of subsistence hunters  
40 participate in the hunt from 28 Federally qualified  
41 subsistence rural communities and the hunters are  
42 typically out in the field for several days to a week  
43 or more at a time. That delay makes in-season harvest  
44 reporting difficult.

45

46 Therefore, the may be announced season  
47 to open and close when necessary due to conservation  
48 concerns would need to be determined pre-season and  
49 based on available data at that time and communicated

50

0642

1 before the fall moose hunt begins.

2

3 Thank you, Mr. Chair.

4

5 CHAIRMAN CHRISTIANSON: Thank you for  
6 putting that on the record, Mr. Striker. Any other  
7 comments, deliberation by the Board.

8

9 (No comments)

10

11 CHAIRMAN CHRISTIANSON: Please read  
12 into the record -- oh, wait. Frank.

13

14 MR. WOODS: Public Member Woods. I'd  
15 like to concur with Jack's observation of 44 bulls per  
16 100 cows and it gives flexibility for additional  
17 harvest.

18

19 Alternative considered for Southcentral  
20 came from -- that gives a flexibility for the  
21 Superintendent to close the fall season in Unit 11  
22 while the Southcentral supported extended. They're a  
23 conservation concern, but with my previous and Jack's  
24 analysis I think there's something on the table that  
25 makes me want to support this as it gives management  
26 tools that includes ADF&G, the Superintendent,  
27 Southcentral Council and Chugach National Forest.

28

29 And this is Ahtna Intertribal Resource  
30 Commission's input on when we can ask for an extended  
31 season. In-season management tool gives flexibility  
32 for when the harvests are low, provides opportunity and  
33 gives additional subsistence resource which I don't  
34 think was going to affect the overall harvest. If it  
35 gets too high, they can shut it down immediately or  
36 they can open it up. So that gives an in-season  
37 management tool and manager's input from the region.  
38 It looks like three different Federal management,  
39 Chugach Superintendent and the RACs.

40

41 So with that I'll -- that was my  
42 observation on this proposal. Thank you.

43

44 CHAIRMAN CHRISTIANSON: Any other  
45 discussion, comments.

46

47 (No comments)

48

49 CHAIRMAN CHRISTIANSON: Hearing, seeing

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0643

1 none. Please read into the record the motion. Roll  
2 call.

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MS. LEONETTI: The motion is to adopt Wildlife Proposal 26-28a with Board modification to establish a may be announced moose season in Unit 11 from September 21 to 30 and to delegate authority to the Wrangell-St. Elias Superintendent to open and close a season between September 21 to 30 via Delegation of Authority letter only.

National Park Service Member Striker.

MR. STRIKER: Park Service supports.

MS. LEONETTI: BLM Member Pendergast.

MR. PENDERGAST: BLM supports with modification for the reasons supported or articulated by the Park Service.

MS. LEONETTI: Public Member Payenna.

MR. PAYENNA: I support WP26-28a.

MS. LEONETTI: Public Member Woods.

MR. WOODS: Public Member Woods supports with previous information under the RACs' support. So thanks.

MS. LEONETTI: Public Member Oney.

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

MS. LEONETTI: BIA Member John.

MS. JOHN: BIA votes to adopt and support in the National Park Service motion and in deference to the Southcentral RAC recommendation. As per the Council and the National Park Service's justifications, if authorized by the Wrangell-St. Elias NPS in-season manager, the extended hunt could provide opportunities for a late season harvest without competition from sporthunters and enables subsistence users to take advantage of cooler weather for better care of their meat.

0644

1 We also appreciate the Ahtna  
2 Intertribal Resource Commission's information, which  
3 was very helpful for our decision on this proposal.

4  
5 MS. LEONETTI: Fish and Wildlife  
6 Service Member Boario.

7  
8 MS. BOARIO: Fish and Wildlife Service  
9 supports with the National Park Service modification  
10 for the reasons thoroughly explained by Regional  
11 Director Striker.

12  
13 MS. LEONETTI: Public Member Pitka.

14  
15 MS. PITKA: I vote to support WP26-28a  
16 as stated by the National Park Service and in deference  
17 to the Regional Advisory Council. Thank you.

18  
19 MS. LEONETTI: Forest Service Member  
20 Ingersoll.

21  
22 MR. INGERSOLL: Forest Service supports  
23 for the reasons articulated by the Park Service. This  
24 seems to strike a reasonable balance of conservation  
25 and subsistence priority and provides flexible  
26 management options in the delegation of authority.  
27 Thank you.

28  
29 MS. LEONETTI: Chair Christianson.

30  
31 CHAIRMAN CHRISTIANSON: I support as  
32 stated by everybody. Thank you.

33  
34 MS. LEONETTI: Mr. Chair, the motion  
35 carries unanimously.

36  
37 CHAIRMAN CHRISTIANSON: Thank you.  
38 We'll move on to WP26-28b, 29 and 30.

39  
40 MS. HOLMAN: Good afternoon again.  
41 Kendra Holman for the record. So this is a presentation  
42 of a summary of analysis for Wildlife Proposals  
43 WP26-28b, 29 and 30. They can be found starting on  
44 Page 867 of your meeting book.

45  
46 WP26-28b submitted by the Southcentral  
47 Regional Advisory Council requests that the moose  
48 season in Unit 13 be extended by 10 days to close  
49 September 30th. WP26-29 submitted by Newt Jackson  
50

0645

1 requests to shift the moose season in Unit 13 by five  
2 days later to August 6 through September 25th. WP26-30  
3 was submitted by Shirley Tursy Smelcer, and I apologize  
4 if I said that wrong, and requests to shift the moose  
5 season in Unit 13 10 days later to August 11th through  
6 September 30th.

7

8                   There have been many regulatory changes  
9 since the Federal regulations were established in 1992.  
10 Most recently in July of 2020 the Board adopted the  
11 modification for Temporary Wildlife Special Action  
12 WSA20-03 limiting the closure of Federal public lands  
13 to Units 13A and 13B to caribou and moose hunting by  
14 non-Federally qualified users for the 2020-2021  
15 seasons. The Board also extended the request to  
16 regulatory years 2021 and 2022.

17

18                   In July of 2024 the Board adopted  
19 Wildlife Special Action 24-06 with modification,  
20 closing Federal public lands in Unit 13B to the hunting  
21 of moose by non-Federally qualified users for the  
22 2024-2025 and the 2025-26 seasons.

23

24                   At the January 2025 Board of Game they  
25 changed the population and harvest objectives for moose  
26 in Unit 13B, 13C and 13E. These changes can be seen on  
27 Table 2 on page 879 of your meeting book.

28

29                   Figure 2 on Page 882 of your meeting  
30 book shows the estimated population by sub-unit. The  
31 Unit 13A moose population estimate remain within  
32 management objectives. The Unit 13B moose populations  
33 however has exhibited a consistently declining trend  
34 since 2010.

35

36                   In 2024 the Unit 13B moose population  
37 estimate increased slightly while the population  
38 objectives were reduced, indicating that the Unit 13B  
39 moose population is still currently at 68 percent of  
40 the lower end of the new population objective range.

41

42                   The Unit 13C moose population estimate  
43 decreased substantially in 2024 while its population  
44 objective increased resulting in the most recent Unit  
45 13C moose population estimate to be below current  
46 management objectives.

47

48                   The Unit 13D moose population estimate  
49 dipped below objectives in 2022 where it has remained.

50

1 The Unit 13E moose population estimate dipped just  
2 below objectives in '23 and remained there in 2024.  
3 Table 3 on Page 880 of your meeting book shows the Unit  
4 13 moose composition and population estimates from the  
5 fall aerial surveys in trend counts.

6  
7 Early calf mortality has been high  
8 resulting in most cows not lactating over the summer,  
9 suggesting nutrition may be limiting, especially in the  
10 Unit 13C and 13B.

11  
12 Between 2000 and 2023 an average of  
13 4,332 people hunted under State regulations each year  
14 reporting an annual average harvest of 782 moose for a  
15 17 percent success rate. Over the same period an  
16 average of 579 people hunted under Federal regulations  
17 reporting an average of 62 moose for an 11 percent  
18 success rate. Table 5 on Page 887 of your meeting book  
19 shows some of this information.

20  
21 Federally-qualified subsistence users  
22 hunting under Federal regulations comprise about 12  
23 percent of total moose hunters and account for 7  
24 percent of the reported harvest in Unit 13 on average.  
25 However, Federally-qualified subsistence users hunt  
26 under both the State and Federal regulations, which  
27 would increase the percentage of Unit 13 moose hunters.

28  
29 On Table 6 of Page 888 of your meeting  
30 book this shows the average annual moose harvest  
31 statistics for Federal and State hunters in Unit 13.  
32 While Table 7 shows the total harvest for the State  
33 community subsistence hunts for moose in Units 11, 13  
34 and a portion of 12.

35  
36 One alternative considered was to only  
37 extend or shift the moose season later in the year in  
38 some of Unit 13 sub-units. Most moose population  
39 status the amount of Federal public lands and the  
40 harvest pressure by Federally qualified subsistence  
41 users varies greatly by sub-unit.

42  
43 Therefore, the benefits to Federally-  
44 qualified subsistence users and potential impacts to  
45 the Unit 13 moose population of extending or shifting  
46 the season also varies by sub-unit. Of course, if the  
47 season were only extended in a single sub-unit, harvest  
48 pressure in that sub-unit would likely increase and  
49 disproportionately during the extended season dates.

0647

1                   If this proposal were adopted, the  
2 Federal moose season in Unit 13 would be extended by  
3 five days if 28 -- one of the proposals -- this  
4 extension would provide Federally-qualified subsistence  
5 users with more hunting opportunity and a greater  
6 success to the resource under Federal regulations.

7  
8                   Shifting the season later corresponds  
9 with changing weather patterns and moose behavior that  
10 could improve hunter success and ease field care of  
11 meat after butchering.

12  
13                   Impacts to the Unit 13 moose population  
14 are uncertain. Unit-wide the moose population has been  
15 declining and is currently below State management  
16 objectives. Increasing any bull harvest during an  
17 extended Federal season has the potential to negatively  
18 impact the bull:cow ratios.

19  
20                   Extending the moose season in Unit 13  
21 increases subsistence opportunity and provides a  
22 meaningful subsistence priority allowing Federally-  
23 qualified subsistence users to hunt during biologically  
24 and culturally appropriate times. As the State hunt is  
25 closed, all competition with other users.....

26  
27                   The extended season also provides  
28 better hunting conditions due to the later onset of rut  
29 in recent years and cooler weather that makes meat  
30 storage in the field easier. A combination of low  
31 harvest pressure and adequate moose populations and/or  
32 bull:cow ratios suggest no conservation concerns and  
33 support extending the season in Unit 13 to provide  
34 additional opportunity for Federally qualified  
35 subsistence users.

36  
37                   The relatively small amount of Federal  
38 lands in Unit 13 further provides potential impacts --  
39 further reduces potential impacts to the Unit 13 moose  
40 population.

41  
42                   OSM's conclusion is to support Proposal  
43 WP26-28b and take no action on Proposals WP26-29 and  
44 WP26-29/30.

45  
46                   Thank you, Mr. Chair. Members of the  
47 Board. I'd be happy to address any questions.

48  
49                   CHAIRMAN CHRISTIANSON: Thank you for  
50

0648

1 that. Any questions for Staff on this proposal.

2

3

(No questions)

4

5

CHAIRMAN CHRISTIANSON: Thank you. Any written public comments received.

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MS. HOLMAN: There was -- Mr. Chair, there was one written public comment received from the Ahtna Intertribal Resource Commission supporting all three of these proposals regarding 28a. This modest extension directly benefits Ahtna communities throughout Unit 13, including Gulkana, Tazlina, Copper Center, Cantwell and Chistochina by improving flexibility and increasing the chances of harvest success during the fall season.

Regarding 29 and 30, which proposed shifting the season in Unit 13 the proposal is backed by multiple years of harvest data showing that most Federally-qualified users are successful during the final seven to 10 days of the current season. Shifting the seasons later increase the likelihood of success for Ahtna hunters and increase and addresses shifting ecological patterns caused by climate change.

Those were short pieces out of their comments.

CHAIRMAN CHRISTIANSON: Thank you. Appreciate the brevity. Summary of tribal government and Alaska Native Corporations.

MR. LIND: Thank you, Mr. Chair. During the August 19 to February 18th and April 20th representatives from Ahtna were in support of these proposals. Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you. Tribal, Alaska Native organization. We have Karen.

MS. LINNELL: Thank you, Mr. Chair. For the record again my name is Karen Linnell, Executive Director of Ahtna Intertribal Resource Commission representing eight Federally and State recognized tribes and two ANCSA corporations.

We support these proposals providing additional time out in the field. This summer -- last

0649

1 fall I was out the 1st of September to the 16th of  
2 September and that first week I was out there in  
3 T-shirt and tennis shoes. I've never been able to go  
4 out hunting with a T-shirt and tennis shoes. Usually I  
5 have three or four layers on and I've woken up to two  
6 or three inches of snow at my camp and the last few  
7 years it's been a lot warmer. The moose aren't moving.  
8 They're still high up in the hills in the mountains.  
9 We're asking for these changes in the later part of the  
10 season.

11

12 If you recall during Tribal  
13 Consultation I did bring forward a graphic showing the  
14 community harvest system hunt permits that Ahtna  
15 Intertribal Resource Commission that you folks have  
16 authorized. Last year 92 percent of the folks hunted  
17 on Federal lands out of the 26 permits that we issued.  
18 They were out there total combined of 290 days with no  
19 harvest.

20

21 Under the State system for the 2026  
22 community subsistence hunts permits by location there  
23 are about 83 percent of those permits go to urban  
24 areas. So we do have a lot of competition. If you  
25 look at the charts and the number of hunters that come  
26 into the region, you're looking at over 5,000 people  
27 hunting in that area. The entire basin has less than  
28 2,000 people and that's if every single man, woman and  
29 child hunted.

30

31 So it's pretty significant the impacts  
32 that we have in our region. It's the blessing and  
33 curse of being road accessible. Anyway, I strongly --  
34 we strongly support this extension or shifting and look  
35 forward to being able to provide additional opportunity  
36 for Federally-qualified users to provide for their  
37 homes and their community.

38

39 With that I'll stop. There are -- like  
40 I said, I think the reports got emailed to you. I know  
41 that my regulation specialist, Deanna Kosbruk, had sent  
42 it to Robbin and Orville to distribute to the Board.

43

44 I do want to say that, you know, that  
45 makes a big difference in being able to provide for our  
46 needs. Thank you so much.

47

48 CHAIRMAN CHRISTIANSON: Thank you for  
49 that, Karen. Any questions.

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(No comments)

CHAIRMAN CHRISTIANSON: Appreciate your testimony and your leadership. Thank you. Advisory group, SRC, State Advisory, multi-agency group.

MS. LAVINE: Thank you, Mr. Chair. The Wrangell-St. Elias National Park Subsistence Resource Commission supported Wildlife Proposal 26-29 as written and took no action on WP26-28b and WP26-30. Shifting the season five days to August 6.

CHAIRMAN CHRISTIANSON: Public.

MS. KOSBRUK: Thank you, Mr. Chair. For the record my name is Deanna Kosbruk. I will be providing a personal testimony on these proposals. I just want to thank you guys taking these proposals up and for consideration. I do also want to raise awareness that with this Administration and everything that's going on in the world, and our gas prices. We're seeing an increase in a lot of prices, so I think another concern we're going to have to look forward to is more overcrowding in our region. With trying to ensure that they harvest for their winters, urban hunters, so I think we have to keep that in mind, and just a safety concern because we're already overcrowded. I could imagine seeing that increase more in our region. As stated before, we are very conservative, especially (indiscernible) but I feel that even though, you know, we can't predict what the weather is going to be like anymore, nor how overcrowded we are going to be. We will ensure that we, as tribal citizens individually will ensure that we are having our conservation concerns right there and in mind.

Thank you.

CHAIRMAN CHRISTIANSON: Thank you for calling in today and sharing your testimony. That concludes the public testimony on this proposal, thank you. Council recommendations.

MS. CAMINER: Thank you, Mr. Chair. It's been many years since the Board recognized, and many members experienced the effects of climate change. At the time there was always something hanging over our heads, like how will we adapt to it. I think these

0651

1 proposals are a great example of how the Federal  
2 program has and will continue to adapt to our changing  
3 climate times. It's great that the program is that  
4 flexible. This is similar in a way to the past  
5 proposal. This allows Federally-qualified subsistence  
6 users a period of time to hunt without interference  
7 from other users in an area that has very high levels  
8 of competition, so provides as it should of subsistence  
9 priority and increasing opportunity. Federal harvest  
10 in the area is relatively low, and additional harvest  
11 resulting from this season change is not expected to  
12 lead to unsustainable levels of take.

13 Council doesn't feel that we should  
14 take anything away from subsistence users, we always  
15 like to try to maximize the opportunity. We don't  
16 expect a substantial increase by this timing change.

17  
18 Thank you very much.

19  
20 CHAIRMAN CHRISTIANSON: Thank you, Judy.  
21 Any questions for our -- Eastern Interior take no  
22 action. Alaska Department of Fish and Game.

23  
24 MR. MULLIGAN: Thank you, Mr. Chair.  
25 For the record, The Alaska Department of Fish and Game  
26 opposes the proposals as they all misalign State and  
27 Federal regulations. Thank you.

28  
29 CHAIRMAN CHRISTIANSON: Thank you, Ben.  
30 InterAgency Staff.

31  
32 MS. LAVINE: The InterAgency Staff  
33 Committee submitted the standard comment.

34  
35 CHAIRMAN CHRISTIANSON: Thank you.  
36 Board discussion with liaisons, any further questions,  
37 clarification needed.

38  
39 (No comments)

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

43  
44 MR. PENDERGAST: Mr. Chair.

45  
46 CHAIRMAN CHRISTIANSON: You have the  
47 floor, Kevin.

48  
49 MR. PENDERGAST: Thank you, Mr. Chair.

50

0652

1 Kevin Pendergast, BLM. I move to adopt Proposal WP26-  
2 28b and take no action on Proposals 29 and 30. If I  
3 get a second I'll explain why I intend to vote in  
4 support of my motion.

5

6 MR. STRIKER: Park Service seconds.

7

8 MR. PENDERGAST: Thank you. I've spent  
9 some time with this proposal also, obviously this is an  
10 area with a lot of competition. A lot of user groups  
11 potential for conflict but there are some bright spots  
12 as well. The Council has noted that subsistence users  
13 face difficulties meeting their subsistence needs and  
14 continuing with their subsistence uses of moose and  
15 other resources in the region. A large number of non-  
16 Federally-qualified users are competing for moose from  
17 the road system. Also observed increases in  
18 temperatures during the moose season has made meat care  
19 more difficult. Particularly when Federally-qualified  
20 subsistence user may feel forced to access areas  
21 further from the roads in order to avoid competition  
22 for moose. I'll just note, being familiar with some of  
23 these areas, a lot of folks can get pretty far from the  
24 road with the kind of vehicles they got these days so  
25 getting beyond that if you want to reduce competition  
26 is a chore. Though the overall moose population in  
27 Unit 13 has been decreasing and is below the State  
28 objective, this is mostly due to the population decline  
29 in Unit 13B, Units 13A, C and E, and this is the bright  
30 spot are within their population objectives.

31

32 Overall there isn't a conservation  
33 concern, bull to cow ratios are within State objectives  
34 so there's a harvestable surplus of legal bulls.  
35 Extending the Federal subsistence moose season on  
36 Federal land in Unit 13 by 10 days is expected to  
37 provide a meaningful preference for Federally-qualified  
38 subsistence users without significantly impacting moose  
39 population. Federal season starts 20 days earlier than  
40 the State community subsistence hunt and a month before  
41 the State general season. Federally-qualified  
42 subsistence users harvest less than 10%, roughly, of  
43 the harvest taken by State hunters.

44

45 Since 2000, Federally-qualified users  
46 have harvested on average about 59 moose per year and  
47 State hunters harvested an average of 698 moose per  
48 year. Again, extending the Federal season until the  
49 end of September is not expected to substantially  
50

0653

1 increase bull harvest and lead to conservation  
2 concerns. But, it does seem clear those extra 10 days  
3 are expected to provide Federally-qualified users with  
4 a meaningful preference from September 20th to the 30th  
5 when temperatures are cooler and better for hunting and  
6 meat care, these Federally-qualified users will be able  
7 to hunt moose on Federal lands without competition from  
8 non-Federally qualified users and this should help them  
9 continue with their subsistence uses of moose.

10

11 CHAIRMAN CHRISTIANSON: Thank you for  
12 that motion, any other board deliberation discussion.  
13 Roll call.

14

15 MS. LEONETTI: The motion is to adopt  
16 Wildlife Proposal 26-28b and take no action on Wildlife  
17 Proposal 26, 29, and 30. I'll say it again, the motion  
18 is to adopt Wildlife Proposal 26-28b. And take no  
19 action on Wildlife Proposal 26, 29, and 30.

20

21 BLM Member Pendergast.

22

23 MR. PENDERGAST: I vote in support.

24

25 MS. LEONETTI: Public Member, Payenna.

26

27 MR. PAYENNA: I support. As commented  
28 by BLM in deference to the RAC.

29

30 MS. LEONETTI: Public Member Woods.

31

32 MR. WOODS: Public Member Woods supports  
33 for reasons of accommodation of low harvest pressure  
34 and adequate moose populations observed by, commented,  
35 and observed by OSM that the bull/call ratio suggests  
36 that no conservation concerns and support extending the  
37 season, the Unit 13 to provide additional opportunity  
38 to Federally-qualified subsistence users and relatively  
39 small amount of Federal lands in Unit 13 further  
40 reduces potential impacts in Unit 13 moose.

41

42 Thank you.

43

44 MS. LEONETTI: Public Member, Pitka.

45

46 MS. PITKA: I vote to support adopting  
47 WP26-28b and take no action on WP26-29 and 30 in  
48 continuation of subsistence uses and also in deference  
49 to the Southcentral Regional Advisory Council, thank  
50

0654

1 you.

2

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

5

6 MS. BOARIO: Fish and Wildlife Service  
7 supports in deference to the RAC and for the reasons  
8 provided by the Bureau of Land Management.

9

10 MS. LEONETTI: BIA Member, John.

11

12 MS. JOHN: BIA votes to adopt WP26-28b  
13 and take no action on WP26-29 and WP26-30. This  
14 supports the BLM's motion and the Southcentral RAC  
15 recommendation, we concur with their justifications for  
16 these proposals.

17

18 MS. LEONETTI: Public Member, Oney.

19

20 MR. ONEY: Public Member Ray Oney moves  
21 to adopt WP26-28b, and take no action on WP26 and 30 as  
22 articulated by Southcentral RAC and BLM.

23

24 MS. LEONETTI: Park Service Member,  
25 Striker.

26

27 MR. STRIKER: Park Service supports in  
28 deference to the RAC and for the reasons articulated by  
29 the BLM.

30

31 MS. LAVINE: Forest Service Member  
32 Ingersoll.

33

34 MR. INGERSOLL: Forest Service supports  
35 in deference to the RAC for the reasons articulated by  
36 the Bureau of Land Management and to sustain a  
37 meaningful preference for subsistence users.

38

39 MR. LEONETTI: Chair Christianson.

40

41 CHAIRMAN CHRISTIANSON: I support in  
42 deference to the RAC and providing an additional  
43 opportunity for subsistence users to meet their needs.  
44 Thank you.

45

46 MS. LEONETTI: Mr. Chair, the motion  
47 passes unanimously.

48

49 CHAIRMAN CHRISTIANSON: Thank you. 26-

50 31.

1 MS. HOLMAN: All right, thank you Mr.  
2 Chair. Again for the record, Kendra Holman, Wildlife  
3 Biologist with OSM. This is a summary of the analysis  
4 for Wildlife Proposal WP26-31 and can be found starting  
5 on Page 901 of your meeting book. This proposal was  
6 submitted by Kirk Wilson and the proponents states that  
7 this proposal was initially submitted as a special  
8 action WSA2406. The Board adopted this special action  
9 with modification closing only Unit 13B moose hunting  
10 by non-Federally-qualified subsistence users for the  
11 '24/25 and '25/26 regulatory years.

12  
13 The food security situation for  
14 residents in Unit 13 is now more dire than it was when  
15 the special action was submitted. Without the Nelchina  
16 Caribou Herd, Federally-qualified subsistence users  
17 rely heavily on moose as an alternative resource.  
18 There's not much competition that people - - but there  
19 are so much competition that people are unable to  
20 continue their subsistence use of the species.

21  
22 The regulatory history as well as the  
23 biology and harvest are the exact same as they were on  
24 the previous proposals, if you would like me to go over  
25 any of that I can go back and do so but otherwise I  
26 will just move forward.

27  
28 The effects and justifications for this  
29 one, so if WP26-31 is adopted, unencumbered BLM lands  
30 within Unit 13 will be closed to moose hunting by non-  
31 Federally qualified users. These are lands depicted in  
32 the Unit 13 map included in the Federal Wildlife  
33 Regulation booklet, which is Figure 1 of on Page 906 of  
34 the meeting book. The encumbered BLM land s in Unit 13  
35 are not open to hunting under Federal regulation's and  
36 are not depicted on the Unit 13 map included in this.

37  
38 Closure for conservation of healthy  
39 moose populations may be warranted in Units 13B and 13D  
40 where the moose population has declined substantially  
41 according to ADF&G surveys in trend count areas.  
42 Figure 2 from WP26-28B 29-30 on Page 882 of your  
43 meeting book shows some of this information. The Unit  
44 13B moose population has suddenly declined 49% since  
45 2010 and is currently below recently reduced State  
46 management objectives. Bull/Cow ratios have remained  
47 within State management objectives. Fall calf/cow  
48 ratios have consistently been below objectives and are  
49 very low on 2023 at only 10 calf s per 100 cows.

1                   Additionally yearling bull/cow ratios  
2 have been considered below objectives, indicating few  
3 bulls may be available for harvest in the future.  
4 However, the State's general moose season in Unit 13  
5 has antler restrictions substantially mitigating  
6 conservation concerns, while the State's community hunt  
7 is any bull, ADF&G reduced, the any bull quota, if  
8 bull/cow ratio sorry to many things popping upon me -  
9 reduces the any bull quota, if bull/cow ratios are  
10 below management objective and implements antler  
11 restrictions once the quota is met. Further mitigating  
12 conservation concerns for the Unit 13 moose population.

13  
14                   Unit 13D's moose population estimate  
15 declined precipitously in 2023, while the estimate  
16 improved somewhat in 2024, it is still below management  
17 objectives. Additionally, the bull/cow ratio in 13D  
18 have consistently been extremely high since 2010,  
19 indicating that there are a surplus of bulls available  
20 for harvest. Closure for conservation concerns is not  
21 warranted in 13A and 13E where the moose populations  
22 have remained relatively stable and are within, or just  
23 below, management objectives. While the Unit 13C moose  
24 population estimate has consistently been within  
25 management objectives, the 2024 estimate decreased  
26 substantially while management objectives increased.  
27 However, similar to Unit 13D additional years of  
28 population estimates are needed before drawing a  
29 decisive conclusion on the status of Unit 13C moose  
30 populations.

31  
32                   Closure for continuation of subsistence  
33 uses of moose may be warranted in Unit 13B. Moose  
34 hunters and harvests are concentrated in Unit 13B under  
35 both Federal and State regulations. Tables 6 and  
36 Figure 4 on Page 888 and 889 of your meeting book have  
37 some of this information. Available evidence indicates  
38 that Federally-qualified subsistence users in Unit 13  
39 face significant challenges in harvesting sufficient  
40 moose and will face challenges to meeting subsistence  
41 needs due to recent closures to caribou harvests.

42  
43                   While OSM recognizes these challenges,  
44 OSM supports extending the moose season in Unit 13 as  
45 requested in proposal WP26-28b, rather than closing to  
46 non-federally qualified users to support the  
47 continuation of subsistence uses and a meaningful  
48 subsistence priority. Extending the season provides  
49 opportunity for users to hunt without any competition  
50

0657

1 from state hunters as the state hunt will be closed.  
2 The extended season also provides better hunting  
3 conditions due to the later onset of the rut in recent  
4 years in cooler weather, this makes meat storage in the  
5 field easier. Therefore, OSM considers extending this  
6 season more appropriate and beneficial than restricting  
7 to non-Federally qualified subsistence users.

8  
9 The OSM preliminary conclusion is to  
10 oppose this proposal.

11  
12 Thank you Mr. Chair, members of the  
13 Board, I'd be happy to address any questions.

14  
15 CHAIRMAN CHRISTIANSON: Thank you, any  
16 questions for Staff on this proposal.

17  
18 (No comments)

19  
20 CHAIRMAN CHRISTIANSON: Hearing none,  
21 seeing none, any written comment to this.  
22 E

23 MS. HOLMAN: MR. Chair there was one  
24 written public comment received it was from the Ahtna  
25 InterTribal resource commission supporting the closure  
26 of the BLM managed Federal public lands in Unit 13 to  
27 the harvest of moose by non-Federally qualified users.  
28 This action builds upon the emergency closure granted  
29 by Wildlife Special Action WSA 2406 which applied to  
30 BLM lands in Unit 13 during the 2024 season due to high  
31 levels of competition, safety concerns, and reduced  
32 subsistence opportunity.

33  
34 CHAIRMAN CHRISTIANSON: Thank you.  
35 Summary of tribal government and Alaska Native  
36 Corporation consultation.

37  
38 MR. LIND: Thank you, Mr. Chair. During  
39 the consultation sessions there were Ahtna tribes  
40 representatives in support of WP26-31. Thank you.

41  
42 CHAIRMAN CHRISTIANSON: Thank you.  
43 Tribal Alaska Native Organization testimony

44  
45 MS. LAVINE: Thank you, Mr. Chair. Karen  
46 Linnell.

47  
48 MS. LINNELL: Thank you, Mr. Chair.  
49 Again, for the record my name is Karen Linnell,  
50

0658

1 executive director of Ahtna InterTribal Resource  
2 Commission. That represents eight Federally recognized  
3 tribes that surround Unit 13, two corporations.

4  
5 I want to say that there is new  
6 information, and that is the information that was  
7 provided to you in Ahtna InterTribal Resource  
8 Commissions executive summary on our committee harvest  
9 system. This actually, the Southcentral RAC took this  
10 under consideration and had already taken action on  
11 this proposal when we gave our community harvest system  
12 report at their last meeting. Just the way it fell in  
13 the agenda, we were at the end and they took a motion  
14 to reconsider that proposal and are now in support of  
15 this closure based on the amount of effort that goes  
16 out there and still not being successful. I also  
17 showed you a graphic where the State community harvest  
18 system which allows 100 any bulls and that are spread  
19 out between the subunits. 13A West is closed and East,  
20 Lake Louise is open to any bulls. Each one is  
21 separated and that is how they do the allocation for  
22 the any bulls, is based on the bull/cow ratios and that  
23 kind of thing. Those things are also taken into  
24 consideration. The modification that was made last  
25 time to make it only 13B if you look at that map in  
26 your book, 13E and 13D have very little and 13C very  
27 little BLM lands open and available for hunting. For  
28 you folks to exclude those and allow for the  
29 communities to participate there and have less pressure  
30 by closing the lands I think is - - I didn't think it  
31 was warranted for this modification and I was  
32 disappointed in OSM for making that recommendation  
33 since the entire BLM lands is 6% of unit 13 that's  
34 available for hunting.

35  
36 Again in the last proposal there's over  
37 5,000 folks hunting in that area, not all of them are  
38 Federally-qualified. Those are folks that come from  
39 all over the state of Alaska and allowing rural  
40 residents to have this little sliver of land to hunt  
41 and to provide for their families and their communities  
42 is vital. We've had some closure for salmon, for  
43 chinook retention, we've had limitations on some of the  
44 other subsistence. We haven't been able to get any  
45 caribou, so this, for the moose it is important and its  
46 needed to allow for our folks to harvest. Our people  
47 used to hunt all over Unit 13, all over. Cantwell is a  
48 part of the Ahtna region, because we were there in the  
49 middle. The folks from Gulkana are very closely  
50

0659

1 related to the folks in Cantwell. I took my Auntie  
2 berrypicking on the Denali highway and she said we  
3 should keep going a little bit so we would go a little  
4 farther a little farther and then she said we are  
5 almost to Cantwell, I want to go see my Uncle Henry  
6 Peters, I haven't seen him in a very long time. We  
7 went to Cantwell and had tea with him. That's how  
8 close we are related to them. That piece is ours, but  
9 in the early 80's they started regulating the size bull  
10 we could get. It started with a 36" size bull and our  
11 Chief Roy Ewan said what am I supposed to do, carry  
12 around a tape measure. Then it went to 40" and then it  
13 went to 44" then it went to 48" then it went to 50".  
14 At 95 years old he got a moose and he got it taken away  
15 from him because it was an inch too small. It ended up  
16 being given away to people on the road kill list. They  
17 found out who shot it and they took it back to him.  
18 That's the kind of thing, an inch too small, for a 50-  
19 inch bull and a 90 year old man to harvest. This  
20 little sliver of land, they start to call us highway  
21 hunters because we have to follow the highway from this  
22 any bulls.

23

24 In our way we are not supposed to turn  
25 anything away, if it presents itself to you, you are  
26 supposed to take it. My husband and I got in a big  
27 fight one time over this. I broke my leg the year I  
28 lost both my uncles, my mom's brother and my dad's  
29 brother, on the same day, anyway, I broke my leg after  
30 a week after the potlatch and I was just starting to  
31 walk and I get off the knee scooter and I had to walk  
32 in a boot. We were headed home and my husband said  
33 hey, turn around, we came back out of the trail we  
34 didn't see anything, come pick me up. So I went back  
35 and he's like run over to fish camp we have to get some  
36 supplies and so I drove him to fish camp and we were  
37 leaving and this bull was walking down the driveway to  
38 me. My gun was in the back and so I was telling my  
39 husband, get out and shoot it, you have to shoot it.  
40 No, no you have to see if it's you have to shoot it,  
41 he's like what, he's, and I'm yelling at him and it's  
42 still coming to us, so I told him you can't turn it  
43 away, anyway that bull ended up being a 5 and 5, so it  
44 was completely legal, Mr. Mulligan. It presented  
45 itself to us and we couldn't turn it away. We don't  
46 look for the big bulls, we don't look for the biggest  
47 one I ever seen. I saw one last year, it was like a  
48 sheet of plywood walking. We looked at that thing and  
49 we watched it. We watched it for over an hour, we  
50

0660

1 weren't trying to get it, we were just watching it.  
2 That's not the tastiest piece, right, it's those mid-  
3 range, what we used to catch was about 36-40 inches.  
4 Those are the best tasting. And those - - any bulls  
5 are key and important to who we are and those big bulls  
6 are the breeders. I heard Mr. Reakoff talk about them  
7 chasing the little bulls out. They're moving because  
8 the big bulls are the ones that are breeding.

9  
10 Having this capability to have this  
11 open for Federally-qualified users to provide for their  
12 needs with an any bull regulation is important. We  
13 compete for draw tags for the any bulls under the State  
14 system and theirs - - we are competing with folks from  
15 all over the state so that's - - and in the last  
16 proposal you saw there's up to sometimes 78 groups and  
17 there I think last year there were 40 something. It  
18 gets pretty competitive and having that little bit of a  
19 rural priority is key to our success in being able to  
20 provide for our families and our communities.

21  
22 Thank you Mr. Chair.

23  
24 CHAIRMAN CHRISTIANSON: Thank you for  
25 that Karen. Any questions.

26  
27 MR. WOODS: Karen -- Public Member  
28 Woods, asking one question. Are you and your community  
29 and your representatives meeting their subsistence  
30 needs?

31  
32 MS. LINNELL: No. I had last year and  
33 the year before at least two communities that didn't  
34 get any moose so it was on the rest of us to help them  
35 out. They got some through road kill list in the  
36 winter and that kind of thing but yeah.

37  
38 MR. WOODS: I have been following Ahtna  
39 land for a long time and I met you and I really  
40 appreciate your engagement not only at a State level,  
41 Federal level, and a RAC level and here at the Federal  
42 Subsistence Board, what I'm reading is Ahtna  
43 InterTribal Resource Commission Committee harvest  
44 report indicates no moose harvest occurred in the  
45 Federal community harvest system for the last three  
46 years. With success locals are being out competed,  
47 their hunter questionnaire sites reduced, moose  
48 population, environmental conditions, access issues and  
49 an increased competition for reason of those. We have  
50

0661

1 the responsibility to address those issues and  
2 recommendations, to the RAC on working with the State  
3 of Alaska, this is a huge concern and we've addressed  
4 this over and over again. My suggestion would be a  
5 whole list of them, but we have action before us to  
6 help alleviate some of that problem. My suggestion is  
7 separate the registration hunt with a general hunt like  
8 they do in different areas in the state of Alaska and  
9 restrict State users one way or another.

10

11 Second, as we separate Federally-  
12 qualified subsistence users and non-Federally qualified  
13 subsistence users, that's in our purview. This is a  
14 tough call and I'm just regurgitating and addressing  
15 the immediate concerns and what's happening on the  
16 grounds right now, so thank you.

17

18 MS. LINNELL: Mr. Chair, just in  
19 response. The State permittees can right now hunt on  
20 Federal lands, but as a Federal permittee I cannot use  
21 that permit on State land. I can't. I have to get a  
22 State permit to hunt on State land. Why is it that we  
23 have it to where as a Federally-qualified user that I  
24 have my Federal permit but I still have to compete with  
25 folks with a State permit. It's not right. They want  
26 their cake and eat it too. I do apply for those and I  
27 did get my community harvest community subsistence  
28 harvest permit under the State, but you know, it's a  
29 ranking system based on longevity of use things like  
30 that as to whether you're eligible for that any bull  
31 tag.

32

33 MR. WOODS: I appreciate that.

34

35 MS. LINNELL: So some of our younger  
36 hunters are not eligible for that. Something to think  
37 about while you're deliberating over this, what and why  
38 does the State get to hunt on Federal lands, or State  
39 permittees. Also the unencumbered lands those are  
40 State selected, or I mean those are the encumbered  
41 lands are State selected lands and there's about 2  
42 million acres of State selected lands in Unit 13 that  
43 are managed under State regulation and I don't get that  
44 either because it's Federal land.

45

46 I'll stop there because that's another  
47 rant.

48

49 Thank you.

50

0662

1                   CHAIRMAN    CHRISTIANSON:   Thank   you,  
2   Karen.

3  
4                   MS.   INGERSOLL:  Mr.   Chair.   Thank   you  
5   for   your   wisdom   and   leadership   and   sharing   with   us  
6   today.   Question   is,   the   action   that   we   just   took   on  
7   WP26-28b,   does   that   help   and   does   it   change   any   of   your  
8   thoughts   and   positions   on   this   action   on   WP26-31?

9  
10                  MS.   LINNELL:  So   you   extended   it   by   10  
11   days.   You   know,   that'll   help   but   this   is   another   piece  
12   that   will   help.   Being   able   to   be   out   there   on   the   land  
13   and   do   things.   Weather   is   not   entirely   predictable,  
14   right,   and   you're   going   to   see   if   we   get   too   far   in   to  
15   the   end   of   September   that   they'll   be   in   the   rut   and  
16   that   meat   won't   be   as   good.   The   liver   will   be   bad,   and  
17   we   take   all   of   that.   The   stomach,   I   just   had   stomach  
18   the   other   day   at   the   potlatch   that   was   fantastic,   I'm  
19   getting   to   that   stage   where   I   get   to   have   it   as   an  
20   elder   and   I'm   loving   it.   Being   able   to   have   that   and  
21   to   use   it,   it's   important   that   we   have   those  
22   opportunities   and   as   rural   folks   we   know   too   when   it's  
23   not   right   --   right   time   to   go   out   so   if   it   gets   too  
24   close   -   -   if   the   weather   gets   cold   fast   they're   going  
25   to   move   more,   they're   going   to   get   into   the   rut   sooner.  
26   We   know   that   and   having   this   ability   to   have   that  
27   little   6   percent   of   the   Unit   13   as   a   -   -   for   Federal  
28   users   only   is   important,   so   thank   you.

29  
30                  CHAIRMAN    CHRISTIANSON:  Thank   you,  
31   Karen.   Any   other   tribal   Native   organization   testimony  
32   today.

33  
34                  MS.   LAVINE:  Yes,   Mr.   Chair.   Linda   Peat  
35   is   on   the   line.

36  
37                  MS.   PEAT:  Thank   you.   I   testified  
38   yesterday   but   I   just   want   to   come   on   here   and   say   that  
39   I   concur   with   what   Karen   just   testified   on   and   for   my  
40   village   only   one   family   got   one   moose.   That's   where,   I  
41   don't   know   for   how   long.   I   know   it's   at   least   two   or  
42   three   years   and   our   subsistence   needs   are   not   being  
43   met.   I'll   just   say   that   right   now.   The   gentlemen   that  
44   asked   the   question   about   our   subsistence   needs   being  
45   met,   they   are   not.   The   State   can   claim   all   they   want  
46   but   it   comes   down   to   the   people   and   the   actual,   not  
47   everybody   gets   a   moose   and   we're   lucky   that   people  
48   share   with   one   another   to   have   moose.   I   believe   God  
49   blessed   us   with   this   resource   and   with   our   land   and   the  
50

0663

1 area here that and for the Federal Subsistence Board is  
2 supposed to be protecting the rural areas. Here you  
3 guys are talking for BLM opening up for the public. I  
4 think that's kind of wrong there. And whatever I  
5 testified yesterday I stand on today, thank you.

6  
7 CHAIRMAN CHRISTIANSON: Thank you.  
8 Thank you for taking the time to call in today I  
9 appreciate your testimony. Any questions, comments.  
10 Any other tribal Native organization testimony today.

11  
12 (No comments)

13  
14 CHAIRMAN CHRISTIANSON: Hearing, seeing  
15 none, Advisory groups, SRC, State advisory, multi  
16 agency.

17  
18 MS. LAVINE: Thank you, Mr. Chair. The  
19 Wrangell-St. Elias National Park Subsistence Resource  
20 Commission did not support Wildlife Proposal 26-31 with  
21 a tie vote. Some Commission members were concerned  
22 about high levels of competition in Unit 13, detailed  
23 and public testimony and from their experiences moose  
24 hunting in this unit. Other Commission members felt  
25 that Unit 13 Federal lands were so small that a closure  
26 would not have an impact. These Commission members  
27 would prefer to see the season dates shift rather than  
28 close Federal land to non-Federally qualified hunters.  
29 Thank you Mr. Chair.

30  
31 CHAIRMAN CHRISTIANSON: Thank you. Any  
32 public testimony here or online please raise your hand  
33 -- take 5 minutes. 5 minute break. Technical, not  
34 from me for the record.

35  
36 (Off record)

37  
38 (On record)

39  
40 CHAIRMAN CHRISTIANSON: Could everybody  
41 have a seat please we're going to get started.  
42 Katya's going to give us a quick update on something  
43 and then we're going to get back to where we were.

44  
45 (Pause)

46  
47 CHAIRMAN CHRISTIANSON: And before  
48 Katya speaks, Mr. Reakoff is going to depart so he has  
49 a few words.

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0664

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

8

9 (Applause)

10

11 CHAIRMAN CHRISTIANSON: Safe travels  
12 Jack.

13

14 Katya, you have the floor.

15

16 MS. WESSELS: Thank you, Mr. Chair.  
17 Members of the Board. I just wanted to share a piece  
18 of good information. We received today, we received  
19 the appointments for the Regional Advisory Councils,  
20 that's 2025 appointments. The news release just went  
21 out so we're very happy about that and I just wanted to  
22 let you know because I'm sure you're not looking at  
23 your emails to see the news release. And also the most  
24 exciting thing is now we have -- on three Councils we  
25 have young leaders appointed into non-voting seats  
26 Southeast, Southcentral and YKDelta.

27

28 (Applause)

29

30 MS. WESSELS: So for everyone, please,  
31 spread the word for the other Councils that next year  
32 we'll be looking for the young leaders to get  
33 appointed. This year the application period is closed  
34 and we just had a couple of applications so next year  
35 we'll be looking for more.

36

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

38

39 CHAIRMAN CHRISTIANSON: Thank you,  
40 Katya. Thank you for the good news. Welcome aboard,  
41 we have one of them here, Shania, stand up and do a  
42 bow.

43

44 (Applause)

45

46 CHAIRMAN CHRISTIANSON: Welcome aboard.  
47 You just asked if we had a seat for you earlier. Hey,  
48 you got it, I just told them you got to watch what you  
49 ask for, you end up with a job here.

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0665

1 (Laughter)

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

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

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

CHAIRMAN CHRISTIANSON: Yes, you have the floor Mark.

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

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

0666

1                   We generally feel -- we genuinely feel  
2 for the hardships people are encountering with the  
3 decline of the Nelchina Herd, but based on the results  
4 of the previous closure we just don't see this proposal  
5 having the desired effect. Some of these proposals,  
6 Mr. Chairman, and I want to tell you and the rest of  
7 the Board with all due respect, they are dividing  
8 Alaskans and causing more harm than good in the long  
9 run when they pass. This Board should always explore  
10 other biologically allowable options other than  
11 disenfranchising Federally-qualified users. And I'm  
12 really happy that you did exactly that with the passage  
13 of Proposal WP26-28(b). You extended the moose season  
14 in Unit 13, you provided a meaningful preference, I'd  
15 say let's just see how that works.

16  
17                   I guess I'll leave it at that. But  
18 based on your actions on Proposals 26, 28(b), we ask  
19 that you vote down Proposal 26-31.

20  
21                   Thank you, Mr. Chairman.

22  
23                   CHAIRMAN CHRISTIANSON: Thank you for  
24 calling in. Any questions.

25  
26                   (No comments)

27  
28                   CHAIRMAN CHRISTIANSON: Next in the  
29 que, please. Thank you.

30  
31                   MS. LAVINE: Next in the que is Donald  
32 Mike.

33  
34                   MR. MIKE: Thank you, Mr. Chair. I  
35 support WP26-31 as articulated by the Ahtna InterTribal  
36 Resource Commission. And I'd like to read from their  
37 written public comments on the last paragraph, last  
38 sentence. It states: We urge the Federal Subsistence  
39 Board to adopt this proposal in full to ensure that  
40 Federal lands in Unit 13 fulfill the legal and moral  
41 obligation to support indigenous subsistence users.  
42 I'm reminded of past histories where the American  
43 government took over indigenous lands during the  
44 Colonial days that -- and then now we're facing with  
45 Unit 13 sliver of small hunting areas that reduce our  
46 Ahtna brothers and sisters to a small area to hunt.

47  
48                   Thank you.

49  
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0667

1                   CHAIRMAN CHRISTIANSON:       Thank you,  
2 appreciate you calling in to testify. Next in the que.

3  
4                   MS. LAVINE: Next in the que is Deanna  
5 Kosbruk.

6  
7                   MS. KOSBRUK: Yes, thank you, Mr.  
8 Chair. Board Members. Staff. For the record my name  
9 is Deanna Kosbruk. I am a tribal citizen of Gulkana  
10 Village and I'm just testifying personally. Just  
11 mentioned before from my leaders that we are not  
12 meeting our customary and traditional needs in our  
13 region and that should be alarming in itself. And the  
14 elder that was mentioned, Fred Ewan, that was my great-  
15 grandpa, just as many of my elders that have passed  
16 before me, they were strong until they were gone on  
17 this -- until they were done on this Earth, they  
18 ensured that they had a successful harvest for their  
19 family.

20  
21                   In our area our conservation concerns  
22 are first and foremost so we only take what is needed  
23 and a lot of the times that is one moose for a family.  
24 And when I say, family, that's not a household, that's  
25 parents to their kids to their grandkids, that's what  
26 is shared, and that is because of our conservation  
27 concerns.

28  
29                   We understand that -- I understand the  
30 concerns of separation and -- but what I want to  
31 mention and what was brought up to me is that we have  
32 tribal citizens that will not qualify to hunt on these  
33 Federal lands. They may not agree with it but they  
34 understand why it is put forth. The proponents who had  
35 put this proposal forth is a non-Native but it was  
36 because of his connection to our tribal citizens that  
37 he had heard and saw the concerns that we were not  
38 meeting our customary and traditional needs. And,  
39 personally, I don't feel the need that I have to  
40 explain traditional practices to a body but when we  
41 harvest that's part of our healing that brings us  
42 together, it's practice for us to come together, it  
43 brings us back together as a family, as a tribe, to  
44 keep furthering our customaries and our traditions.

45  
46                   I just wanted to share that, you know,  
47 just recently we had our annual meeting and I was  
48 unaware that my coworker had caught a very good picture  
49 and I had an air pod in my ear, this was over a year  
50

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1 ago, and I was listening to a Federal Subsistence Board  
2 meeting while teaching my nephew how to cut a fish.  
3 That is what is important to us, is for us to be able  
4 to continue our practices and also understand our  
5 conservation concerns are still there, but also for you  
6 guys to understand the importance of our area and we  
7 are over populated during hunting seasons as you will  
8 continue to hear that, you know, there is a lot of  
9 competition, there's safety concerns, there is resource  
10 -- there's pressure on our resources out here that are  
11 taken from our tribes. So I just wanted to share that  
12 and thank you.

13

14 CHAIRMAN CHRISTIANSON: Thank you,  
15 appreciate you calling in today to share your lifeway.  
16 Next please.

17

18 MS. LAVINE: Next in the que is  
19 Madeline Demaske.

20

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

39

40 SCI fully understands and supports  
41 ANILCA's priority for subsistence use opportunity,  
42 however, the status of moose in this area does not  
43 require that non-subsistence hunting be restricted to  
44 protect the subsistence priority. According to Alaska  
45 Department of Fish and Game data the moose population  
46 in Unit 13 is stable. A closure of Bureau of Land  
47 Management land in Unit 13 to non-Federally-qualified  
48 users would not be necessary to ensure the continued  
49 viability of healthy moose populations. Further, data  
50

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1 also indicates that the proposed closure will not  
2 benefit subsistence use. In regulatory years 2020 to  
3 2021 and 2021 to 2022, Units 13A and 13B were closed  
4 to moose hunting by non-Federally-qualified users.  
5 More recently 13B was closed to non-Federally-qualified  
6 users for the 2024/2025, 2026 -- and 2026 regulatory  
7 years. My apologies. Harvest reporting data shows  
8 that none of these closures resulted in an increase in  
9 moose catch by Federally-qualified users. Accordingly  
10 the closure is also not necessary for the continuation  
11 of subsistence users.

12

13 As I stated yesterday and as a  
14 reminder, ANILCA does not authorize restricting non-  
15 Federally-qualified users due to perceived competition  
16 between user groups. The Ninth Circuit, Ninilchik  
17 Traditional Council versus United States found that:  
18 Although ANILCA emphasizes the importance of  
19 subsistence lifestyles it's other goals include the  
20 preservation of non-subsistence hunting opportunities  
21 which inherently result in competition. The proponents  
22 made no showing that this limited restriction standard  
23 has been satisfied, stating instead that the proposal  
24 is primarily intended to address competition.

25

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

31

32 Thank you for the opportunity to  
33 comment on this important proposal.

34

35 CHAIRMAN CHRISTIANSON: Thank you. Any  
36 more public testimony at this time Robbin.

37

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

43

44 (Pause)

45

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

49

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0670

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MR. MARSHALL: Okay, am I coming in?

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

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

CHAIRMAN CHRISTIANSON: You have the floor.

MR. MARSHALL: Thank you. I am testifying in support of WP26-31. I'm a -- I, of course, reside in Tazlina, Alaska. I'm a member of the Tazlina Village but more importantly I'm just a member of this community. And I'm testifying in support of it because I know that there's been significant challenges with the rural residents out here in filling their freezers with what is actually a staple diet, it's not like a side dish, this is something that people really rely on. And, you know, I've heard a lot of comment about that there aren't -- there isn't a shortage, well, I can tell you that there is because I know a lot of people who would normally rely on that moose meat are not getting moose, and those who are sharing it across a lot of families.

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

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

Thank you very much for your time.

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

MS. LAVINE: (Shakes head negatively)

0671

1                   CHAIRMAN CHRISTIANSON: That concludes  
2 the public testimony. Council recommendation on this.

3  
4                   MS. CAMINER: Thank you, Mr. Chair.  
5 Southcentral recommendations, we had quite a discussion  
6 over this as I imagine as you might as well, I'm sorry  
7 to be the one to bring some of the tough ones to you.

8  
9                   The person who did put in this proposal  
10 is actually on the RAC, he submitted it personally and  
11 as Deanna said long, long time resident of the area and  
12 who knows the people, knows the traditions and really  
13 respects the tradition of hunting and fishing and is  
14 doing his best to help everybody. Also wanted to  
15 remind you that this area, there's no caribou hunting  
16 and people clearly depended on caribou heavily for many  
17 years so moose is it at this point and it's very  
18 important to them.

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

42  
43                   The proponent stated that not all the  
44 communities with C&T for moose in Unit 13 are qualified  
45 to hunt in the Wrangell-St. Elias National Park and  
46 Preserve, that exclusion makes the BLM lands even more  
47 important. The Ahtna InterTribal Resource Commission  
48 community harvest report indicates no moose harvest  
49 have occurred in their Federal community harvest system  
50

0672

1 hunt for the last three years, despite substantial  
2 hunting effort, suggesting that locals basically are  
3 being out competed. This questionnaire also cites  
4 reduced moose populations, environmental conditions,  
5 access issues and increased competition as reasons for  
6 this lack of success.

7

8 And we discussed all of this quite  
9 thoroughly at our RAC meeting and felt that even though  
10 it might not be a conservation concern, certainly the  
11 conflict between users is a huge concern.

12

13 Thank you, very much.

14

15 CHAIRMAN CHRISTIANSON: Thank you,  
16 Judy. Eastern Interior did not consider.

17

18 MS. LAVINE: (Shakes head negatively)

19

20 CHAIRMAN CHRISTIANSON: Thanks. Next  
21 we'll move on to Alaska Department of Fish and Game.

22

23 MR. MULLIGAN: Thank you, Mr. Chair.  
24 For the record the Alaska Department of Fish and Game  
25 opposes this proposal as it views it unnecessary under  
26 Title VIII of ANILCA, especially now that you have just  
27 given Federally-qualified users an extra 10 days of  
28 opportunity where non-Federally-qualified users will  
29 not be in the field. There are no conservation  
30 concerns associated with the current management  
31 strategy of harvesting bulls as we've heard under a  
32 previous proposal where population objectives weren't  
33 quite there but bull to cow ratios were and you offered  
34 additional opportunity under that proposal.

35

36 For just a bit of history, the last --  
37 the 1st closure where there was multiple GMUs involved,  
38 so the closest one that we can compare to this one, was  
39 in 2020 when you -- the Board, I shouldn't say you --  
40 the Board closed 13A and B, prior to the closure the  
41 success rate for Federally-qualified users was 14.3  
42 percent but during the closure success fell in the  
43 first season to 10.2 and then in the second to 11.9  
44 percent. You guys have -- again sorry -- the Board has  
45 considered closures recently in 2024, passed a closure  
46 for only 13B but then in 2025 you denied a special  
47 action to close 13C. While some of the GMU 13 subunit  
48 moose populations are experiencing slight declines  
49 overall the population in the unit is stable. The  
50

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1 current levels of bull harvest do not pose a biological  
2 concern for the viability of moose populations in the  
3 unit given the bull to cow ratios observed during moose  
4 surveys annually. Federally-qualified users, even  
5 before the passage of 28(b) had almost a 20 day  
6 advantage with the State sea -- in addition to the  
7 State season and then also in addition to that there  
8 are private lands open to Federally-qualified users  
9 that may not be open to non-Federally-qualified users.  
10 We know we've heard a lot of information but just to  
11 put it on the record, for the information that we are  
12 gathering, we are meeting ANS for Unit 13 of 300 to 600  
13 animals. We have consistently met or exceeded the  
14 upper range of this amount since 2006 and this past  
15 season, which I believe was 2024, the ANS was near --  
16 the upper end of ANS was nearly reached with the  
17 harvest of 553 moose.

18  
19 Just some other points to make, with  
20 the closure of the Nelchina Caribou Herd we're actually  
21 seeing a decrease in non-Federally-qualified user  
22 participation. And then also to just make a point for  
23 your consideration is that even with the closure of  
24 moose hunting, if you do pass this, there are still  
25 other big game animals, like brown bear, black bears  
26 that are still going to be hunted and technically can --  
27 those non-Federally-qualified users can still hunt on  
28 those lands, there's no prohibition, only if they were  
29 moose hunting.

30  
31 Thank you, Mr. Chair.

32  
33 CHAIRMAN CHRISTIANSON: Thank you. Any  
34 questions for the State.

35  
36 (No comments)

37  
38 CHAIRMAN CHRISTIANSON: Hearing and  
39 seeing none, InterAgency Staff Committee.

40  
41 MS. LAVINE: Thank you, Mr. Chair. You  
42 can read our full comments in your meeting materials.  
43 The Federal Subsistence Board will need to consider a  
44 few key sections of ANILCA before taking action on  
45 proposals requesting closures and closure reviews.  
46 Specifically those sections pertaining to Council  
47 deference, that's Section .805(c) and those pertaining  
48 to limitations to closures or restrictions of  
49 subsistence and non-subsistence uses on Federal public  
50

0674

1 lands in Sections .815(c) and .816(b). These three  
2 sections speak to the heart of Board authority and  
3 require a careful balance between the Federal priority;  
4 the continuation of subsistence uses; the necessary  
5 conservation of subsistence fish and wildlife and  
6 unnecessary restrictions.

7

8 The ISC appreciates the Council's  
9 concerns for local hunters who face competition from  
10 non-Federally-qualified users and warmer weather  
11 affecting the safe handling of their harvest. The ISC  
12 also recognizes the efforts of the Council to provide  
13 local subsistence users additional opportunity without  
14 competition through their support of Wildlife Proposal  
15 26-28. In the case of 26-31, the ISC suggests the  
16 Council's recommendation may not meet the criteria for  
17 deference.

18

19 Thank you, Mr. Chair.

20

21 CHAIRMAN CHRISTIANSON: Thank you,  
22 Robbin. Board discussion, opportunity to ask questions  
23 of Chairs and Liaisons.

24

25 MR. INGERSOLL: From the Forest  
26 Service.

27

28 CHAIRMAN CHRISTIANSON: Yes, Jerry.

29

30 MR. INGERSOLL: Southcentral Council,  
31 did you look at alternatives short of a full closure  
32 here?

33

34 MS. CAMINER: Thank you for the  
35 question. Through the Chair, Forest Service. We just  
36 talked about the possibility of closures, not knowing  
37 whether the extensions were going to go through so it  
38 was another tool.

39

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

43

44 MS. CAMINER: Through the Chair. I  
45 cannot really answer that because the Council would  
46 have to discuss that.

47

48 MR. INGERSOLL: Thank you.

49

50

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1 MS. CAMINER: Thank you.

2

3 MR. INGERSOLL: For Alaska, are there  
4 -- I mean given that you're meeting the harvest goals,  
5 but that Federally-qualified subsistence users are  
6 reporting lesser success, are there any other tools  
7 that the State of Alaska would recommend to try to  
8 support Federally-qualified users within that, are  
9 there any other tools that we could use to achieve the  
10 purpose of continuing successful subsistence hunts?

11

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

14

15 MR. INGERSOLL: Or that you could  
16 employ, I mean are there.....

17

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

48

49 CHAIRMAN CHRISTIANSON: Thank you for

50

0676

1 that history Ben. Any other questions from the Board,  
2 it's our opportunity.

3

4 (No comments)

5

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

8

9 MR. PENDERGAST: Mr. Chair. After some  
10 careful consideration BLM moves to adopt Proposal 26-31  
11 and if I get a second I'll explain why I intend to vote  
12 to oppose my motion.

13

14 (Pause)

15

16 MS. BOARIO: Fish and Wildlife Service  
17 seconds.

18

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

46

47 At this time the available evidence  
48 does not support closing BLM lands in Unit 13 to the  
49 harvest of moose by non-Federally-qualified subsistence  
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1 users.

2

3

4 I would like to bring up for  
5 illustration that this Board passed Wildlife Special  
6 Action 24-06, which did close Federal lands in Unit 13B  
7 to the harvest of moose by non-Federally-qualified  
8 users for the 2024/25 and 2025/26 seasons but after a  
9 few years now we lack evidence that this closure has  
10 resulted in any meaningful preference. And while the  
11 Federal moose harvest has been declining over the last  
12 three years, so have the number of Federal hunters, the  
13 State moose harvest, and the number of State hunters.  
14 I'll also note that a closure to moose harvest by non-  
15 Federally-qualified users on these lands in Unit 13,  
16 which are generally in small areas close to the road  
17 will not stop non-locals from accessing Federal lands  
18 during the State moose season and will not prevent user  
19 group conflict. Again, the recent adoption of Wildlife  
20 Proposal 26-28(b), which extends the Unit 13 moose  
21 season by 10 days will provide a more meaningful  
22 preference as Federally-qualified subsistence users  
23 will be able to harvest moose on Federal lands well  
24 after the State season has ended. However, the  
25 evidence does not support closing Federal lands in Unit  
26 13 to the harvest of moose by non-Federally-qualified  
27 users.

27

28

Thank you.

29

30

CHAIRMAN CHRISTIANSON: Thank you,

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Kevin.

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Frank.

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ANILCA, Section .818(3) clarifies that  
nothing in this title shall be constructed as

1 authorizing the restriction of taking of fish and  
2 wildlife for a non-subsistence user on public lands  
3 unless necessary for the conservation of healthy  
4 populations of fish and wildlife for the reasons set  
5 forth in .816, but, for the continued subsistence uses  
6 of such populations or pursuant of other -- accept  
7 applicable law. ANILCA Section .816 allows a closure  
8 or restriction of Federal public lands to subsistence  
9 uses for Federal and -- fish and wildlife for reasons  
10 of public safety, administration or ensure the  
11 continued viability of particular fish and wildlife  
12 populations. This is the last one and it's real  
13 important for us: ANILCA Section .805(c) the Board  
14 must consider the recommendations of the Councils  
15 concerning the taking of fish and wildlife on public  
16 lands in a region and may choose not to follow  
17 recommendations only if not supported by substantial  
18 evidence, violates recognized principles of fish and  
19 wildlife conservation or would be detrimental to the  
20 satisfaction of subsistence needs.

21  
22 We heard testimony that the local  
23 villages and the Federally-qualified subsistence users  
24 weren't meeting those needs and I'll put it forward  
25 bluntly, is I am in support of this proposal for that  
26 specific reason. We have a list of huge responsibility  
27 when it comes to this type of action and I believe we  
28 take it seriously and I thank the BLM for bringing  
29 forth the concern because they are serious concerns and  
30 I'll stop and let the process and hopefully more  
31 comments and more input be litigated.

32  
33 Thank you.

34  
35 CHAIRMAN CHRISTIANSON: Any other Board  
36 discussion, deliberation.

37  
38 Kevin.

39  
40 MR. PENDERGAST: I thought it might be  
41 helpful to the discussion to also help folks understand  
42 that talking with BLM law enforcement about this, this  
43 is not, practically speaking, a very enforceable  
44 measure, were we to close these lands. The scale of  
45 use is such and the land pattern is broken up to a  
46 degree that to actually to try to go out and determine,  
47 you know, whether or not folks are legally hunting in  
48 the proper area is extraordinarily difficult, certainly  
49 beyond our resources to say we could effectively  
50

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1 manage. So, again, I would urge folks to consider --  
2 and I understand why it's an attractive proposal to  
3 many, but will it have the desired effect and I just --  
4 I don't think that the evidential bar has been met to  
5 say that that would be true.

6  
7 MR. WOODS: Mr. Chair. Reading through  
8 public comments, reading through all the information  
9 and statewide, hunting seasons have moved later in the  
10 year. We went through three or four proposals before  
11 this that the later the seasons are, the later harvest  
12 success rates are happening. We did that -- I agree  
13 with BLM and their analysis, that isn't going to fix  
14 the problem that we have in front of us, those are just  
15 statewide, and it always will be continuing to change.  
16 This proposal identifies specific reasons why the  
17 proposer is asking us to restrict hunting and fishing  
18 on Federal lands, and it looks like only a -- one thing  
19 I want to point out, is, part of the analysis is it  
20 will restrict Federally-qualified subsistence users  
21 from operating on certain properties too, so they took  
22 the initiative and you heard in public testimony that  
23 they took the initiative to address those areas that  
24 help and would also detrimentally affect those, that  
25 sacrifice for that small group, is better for the  
26 benefit of all. Those things are real important,  
27 number 1, because for me, it looks like they're willing  
28 to stop and help their neighbors on other Federal  
29 lands, it looks like the Wrangell National Park, maybe  
30 somebody else could -- but just in summary, for the  
31 purpose of this, the last statement I read, that  
32 violates recognized principles, fish and wildlife  
33 conservation, and detrimental to the satisfaction of  
34 subsistence needs is why I addressed this proposal the  
35 way I did.

36  
37 Thank you, Mr. Chair.

38  
39 MS. BOARIO: Thank you, Mr. Chair. A  
40 question for the Board also, just to stay focus on kind  
41 of the decision criteria in front of us, I mean a super  
42 valid point our colleagues at BLM are making about  
43 enforcement capacity or capability, I don't know if  
44 that is a relevant criteria to the decision before us  
45 and I'm just asking for a conversation perspective or  
46 an answer from, sorry, our solicitor?

47  
48 MR. PENDERGAST: Well, I would just add  
49 -- Kevin with BLM -- that's why I didn't include in my  
50

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1 motion, it's really provided for context and color, I'm  
2 not including it in my motion.

3

4 MS. BOARIO: I just wanted to make sure  
5 I was staying focused.

6

7 CHAIRMAN CHRISTIANSON: Yeah, I think  
8 enforcement is missing all across the state, I mean you  
9 come to every region and any place and you're lucky to  
10 see one.

11

12 MR. PENDERGAST: And.....

13

14 MS. BOARIO: This.....

15

16 CHAIRMAN CHRISTIANSON: Sara and then  
17 Kevin.

18

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

40

41 Thank you.

42

43 (Pause)

44

45 MS. DOEHL: Through the Chair. Let me  
46 first talk about the criteria for closures to non-  
47 Federally-qualified subsistence users. This has been  
48 touched on before by the ISC. I am going to start with  
49 Section -- ANILCA -- or Section .815(3) of ANILCA, I'll  
50

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1 start with that.

2

3

4 Member Frank Woods also discussed this,  
5 but ANILCA authorizes a restriction on the taking of  
6 fish and wildlife for non-subsistence uses on the  
7 public lands other than National Parks and Park  
8 Monuments unless necessary -- unless necessary for the  
9 conservation of healthy populations of fish and  
10 wildlife, or for the reasons set forth in Section .816  
11 of ANILCA, or to continue subsistence uses of such  
12 populations, or pursuant to other applicable law.

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The criteria referenced in .816 of ANILCA for closures other than -- for closures to subsistence uses of a particular fish or wildlife population, are only if necessary for reasons of public safety administration or to ensure the continued viability of such population.

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

I will also note that the Board has a policy on closures and that policy has additional -- discusses review of proposed closures and basically reiterates that and those sections of ANILCA and similar sections in the regulations. And, you know, the Board will base its actions on substantial evidence contained within the administrative record and on the best available information, complete certainty is not required. If the Board's action is inconsistent with a Council recommendation, then the Board will explain its rationale pursuant to the regulations, the comparable Forest Service and Interior regulations, the Interior one being at 43 CAR 51.10(e)(1), which I can also read so that everyone has it at top of mind and 10(e)(1) is -- speaks to the relationship between the Board and Regional Councils, and states the Board shall consider the reports and recommendations of the Regional Councils concerning the taking of fish and wildlife on public lands within their respective regions for subsistence uses. The Board may choose not to follow any Regional Council recommendation which it determines is not supported by substantial evidence, violates recognized principles of fish and wildlife conservation, would be detrimental to the satisfaction

0682

1 of subsistence needs, or in closure situations, for  
2 reasons of public safety or administration or to assure  
3 the continued viability of a particular fish or  
4 wildlife population. If a recommendation is not  
5 adopted the Board shall set forth the factual basis and  
6 the reasons for the decision in writing in a timely  
7 fashion.

8

9 CHAIRMAN CHRISTIANSON: Thank you. I  
10 think that gives us a side bar. I think Kevin wants to  
11 be recognized.

12

13 MR. PENDERGAST: Thank you. I  
14 appreciate that reading by the Solicitor and just to  
15 continue adding to the discussion here. Again, I think  
16 we've heard multiple times stated this afternoon that,  
17 you know, folks were unsure which of the various  
18 proposals might be passed or be successful, one of  
19 which was 28(b), which we did pass, all of which seem  
20 to be aimed at the same issue, which is competition in  
21 Unit 13. So, again, this Board has taken action this  
22 afternoon, decisive action in a targeted way to help  
23 address that situation, and I just don't see that we're  
24 presented with any new evidence that would support an  
25 additional closure on top of that and certainly not for  
26 conservation purposes so, you know, I just think one  
27 step at a time, and seeing how the 10 day extension  
28 plays and hopefully provides the needed affect would be  
29 BLM's position.

30

31 CHAIRMAN CHRISTIANSON: I'm ready for  
32 Board action. Please read into the record the motion  
33 and roll call please.

34

35 MS. LEONETTI: The motion is to adopt  
36 Wildlife Proposal 26-31.

37

38 BLM Member Pendergast.

39

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

42

43 MS. LEONETTI: BIA Member John.

44

45 MS. JOHN: BIA votes to adopt WP26-31  
46 in deference to the Southcentral RAC. We concur with  
47 the Council's justification regarding the importance of  
48 these Unit 13 Federal lands and their concerns about  
49 how sporthunting competition may be affecting moose

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1 harvest by subsistence users. The extensive testimony  
2 from the Ahtna InterTribal Resource Commission plus  
3 other rural residents regarding their difficulties with  
4 meeting their subsistence moose needs and how much  
5 competition is impacting these abilities is much  
6 appreciated. Our decision to vote for the closing of  
7 these Federal lands is carefully considered and is  
8 based on this valuable local knowledge. With the  
9 ongoing decline in the region's caribou herds moose  
10 have become a very important food source and we feel  
11 that adopting this proposal will be necessary to  
12 continue subsistence uses for Unit 13 rural residents.

13

14                   Quyana.

15

16                   MS. LEONETTI: Forest Service Member  
17 Ingersoll.

18

19                   MR. INGERSOLL: This is a tough one and  
20 I deeply appreciate the testimony of all of those who  
21 have come to it. Forest Service opposes in order to  
22 give the action that we just took on 28(b) a chance to  
23 work and see if that can help address the issue and  
24 then if it does not it would be timely then to bring a  
25 future proposal.

26

27                   MS. LEONETTI: Park Service Member  
28 Patton.

29

30                   MS. PATTON: Thank you, Mr. Chair and  
31 Members of the Board. For the record this is Eva  
32 Patton sitting in for our Director Don Striker who  
33 needed to step out. He did speak to me briefly before  
34 leaving that this is a very difficult decision.  
35 Hearing the public testimony and hearing from our  
36 Regional Advisory Council members and understanding  
37 that there are declines to many subsistence resources  
38 in this region, decline of the Nelchina Caribou Herd  
39 and that the effort that has been made in the past few  
40 years, as we heard from the community harvest, the  
41 Ahtna InterTribal community harvest, not getting any  
42 moose for significant effort. We've heard extensive  
43 testimony on, you know, great amount of user effort on  
44 these Federal public lands on an accessible road system  
45 and the importance of accessing those areas for  
46 subsistence. I do think, also, you know, that our  
47 Director is also looking to the criteria to be met in  
48 terms of a closure and the passage of the extension of  
49 the moose season by 10 days will afford a subsistence  
50

0684

1 opportunity and an opportunity to see the effects of  
2 that, if the hunt may be more successful and,  
3 therefore, would vote to oppose the closure and  
4 hopefully see that the extension of the moose season by  
5 10 days would afford for a subsistence opportunity and  
6 hopefully subsistence harvest success and as noted by  
7 our Forest Service Member here too to revisit whether  
8 that's successful in providing that opportunity in the  
9 future.

10

11

Thank you, Mr. Chair.

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MS. LEONETTI: Public Member Woods.

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

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

MS. LEONETTI: Fish and Wildlife Service Member Boario.

MS. BOARIO: Fish and Wildlife Service opposes for the reasons shared by my colleagues at BLM, Park Service and Forest Service and I share with everyone at the table the challenge and struggle with this one, and am hopeful as others have already said that the extension -- the season extension that we just passed for 26-28(b) will help with opportunity for Federally-qualified subsistence users in 13. I'm concerned about the continuing declines in 13B and 13D and also concerned that the closures that we put in place there the last two years did not result in more

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1 success leading me to support the -- again, the more  
2 time of 26-28(b) and I'm hoping that -- see how that  
3 goes.

4

5 Thank you.

6

7 MS. LEONETTI: Public Member Payenna.

8

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

13

14 MS. LEONETTI: Public Member Oney.

15

16 MR. ONEY: Public Member Ray Oney moves  
17 to support WP26-31 in deference to Southcentral RAC and  
18 articulated by Ahtna and the many people that have  
19 testified online and in person.

20

21 MS. LEONETTI: Public Member Pitka.

22

23 MS. PITKA: I vote to support WP26-31  
24 in deference to the Southcentral Regional Advisory  
25 Council. And in recognition that the decreased  
26 subsistence hunting success is a direct result of a  
27 lower population and the continuation of subsistence  
28 uses of wildlife and the conservation of healthy  
29 populations of that wildlife. Thank you.

30

31 MS. LEONETTI: Chair Christianson.

32

33 CHAIRMAN CHRISTIANSON: Really good  
34 discussion. I have to support the proposal in  
35 deference to the RAC and like you said, it's not that  
36 big of an area and hearing the permit that we did  
37 authorize to Ahtna, I know we did an extension in  
38 giving them opportunity, I was in favor, but as I  
39 listen to compelling testimony I was actually going to  
40 vote the other way but in deference mandated by  
41 Washington, D.C., that's why we have additional Board  
42 members up here is to weigh heavily on the rural  
43 preference and needs of the rural users, being those  
44 and value the Regional Councils work as they look at  
45 the same criteria we do as they look at these and have  
46 more firsthand realtime face to face interaction with  
47 the rural members and it is a highway and they live in  
48 a really heavily utilized area for lots of reasons, I  
49 mean everybody in the state drives through that region

50

0686

1 and so for that, a little reprieve won't hurt, I  
2 support.

3

4 MS. LEONETTI: Mr. Chair, the motion  
5 carries 6 to 4.

6

7 CHAIRMAN CHRISTIANSON: We'll take a  
8 five.....

9

10 (Applause)

11

12 CHAIRMAN CHRISTIANSON: .....minute  
13 break before we get to Southeast. Let's take five.

14

15 (Off record)

16

17 (On record)

18

19 CHAIRMAN CHRISTIANSON: It is Friday at  
20 4:00 o'clock and we only got Southeast left.

21

22 (Laughter)

23

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

28

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

35

36 Proposal 26-03 was submitted by the  
37 Southeast Council, they request to close Federal public  
38 lands in Unit 2 to deer hunting by non-Federally-  
39 qualified users; 04 was also submitted by the Southeast  
40 Council, it requests conducting an ANILCA Section .804  
41 subsistence user prioritization analysis for Unit 2  
42 deer; and WP26-05 was submitted by the Ketchikan Indian  
43 Community, it requests restricting non-Federally-  
44 qualified users to the harvest of one buck only in Unit  
45 2 with a season start date of August 15th. This  
46 proposal also requests restricting Federally-qualified  
47 users who do not reside on Prince of Wales to the  
48 harvest of two bucks in Unit 2 via a Section .804  
49 analysis.

50

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

8

9 In 2003 the Board adopted a proposal  
10 that opened the Unit 2 deer season earlier shifting the  
11 start date from August 1st to July 24th so that  
12 subsistence users would have several days to hunt early  
13 in the season without competition from non-Federally-  
14 qualified users. That same year the Board considered a  
15 proposal that requested a closure to non-Federally-  
16 qualified users from August 1st to September 1st along  
17 with a reduced harvest limit to reduce competition for  
18 a declining deer population. The Board ultimately  
19 adopted that proposal with modification instituting a  
20 closure to non-Federally-qualified users from August  
21 1st to the 21st, but rejecting the proposed harvest  
22 limit reduction. That closure was initially set to  
23 last for one year. The adoption of those two proposals  
24 in 2003 was controversial, and then in 2004 13  
25 proposals were submitted seeking to rescind, modify or  
26 enhance the changes enacted the previous year. The  
27 Board ultimately modified version of one of these  
28 proposals which retained the earlier season opening for  
29 subsistence users and an August 1st to 15th closure to  
30 non-Federally-qualified users. In 2006 the Board  
31 adopted a proposal to exclude the southeastern portion  
32 of Prince of Wales Island from the Unit 2 closure area  
33 aligning regulations more closely with ADF&G  
34 recommendations and providing greater opportunity for  
35 non-Federally-qualified users. In 2015 a proposal was  
36 submitted requesting to limit non-Federally-qualified  
37 users to the harvest of two deer on Federal lands in  
38 Unit 2 and extend the season through January 31st. At  
39 this time the Southeast Council supported the season  
40 extension but not the request to restrict non-  
41 subsistence users and reduce their harvest limit and  
42 the Board adopted this proposal with the Council's  
43 modification. In 2017 the Council submitted a proposal  
44 to limit non-Federally-qualified users to the harvest  
45 of two bucks on Federal lands in Unit 2 and shortened  
46 their season by at least a week after hearing extensive  
47 testimony that local subsistence users were having  
48 increasing difficulty meeting their needs due to  
49 competition and habitat loss. The Board adopted this  
50

1 proposal with modification reducing the harvest limit  
2 for non-Federally-qualified users but leaving the  
3 season length unchanged. That same year the Board also  
4 adopted the Southeast Council's proposal to expand the  
5 customary and traditional use determinations for deer  
6 in Units 1 through 5 so that all rural residents of  
7 these units would be eligible to hunt deer under  
8 Federal regulations throughout the Southeast. And as  
9 you know in February of 2025 the Board adopted NDP25-01  
10 reclassifying Ketchikan as a rural community.  
11 Ketchikan residents subsequently became Federally-  
12 qualified users with customary and traditional use  
13 determinations for Unit 2 deer gaining higher harvest  
14 limits and a longer hunting season. And this is  
15 important because Ketchikan residents were previously  
16 the primary group of non-Federally-qualified users  
17 hunting in Unit 2.

18  
19                   Looking at habitat, logging related  
20 habitat loss, predation by wolves and bears, winter  
21 severity and hunting pressure are the primary factors  
22 affecting deer populations in Unit 2. Since 1954  
23 Prince of Wales Island has experienced the highest  
24 levels of logging in the Southeast. Logging here has  
25 significantly reduced the available old growth winter  
26 habitat, expanded low value stem exclusion stands, and  
27 diminished overall habitat connectivity. ADF&G has  
28 estimated that more than 40 percent of Unit 2's  
29 original old growth forest has been logged over the  
30 past 50 years and that the legacy of these timber  
31 harvest will continue to negatively impact wildlife  
32 populations on the island.

33  
34                   In the 1990s ADF&G and U.S. Forest  
35 Service reported that deer populations would decline as  
36 old growth clearcutting continued with the population  
37 models projecting declines in deer carrying capacity of  
38 50 to 60 percent by the end of the logging rotation in  
39 2054. Long-term consequences of this habitat loss were  
40 expected to include diminished hunting opportunities  
41 and the inability to provide for subsistence needs with  
42 few areas within the road accessible logged portions of  
43 Unit 2 expected to be able to meet hunter demand by the  
44 end of the rotation. More recent U.S. Fish and  
45 Wildlife Service analysis from 2015 and 2016 projected  
46 a 21 to 33 percent decline in the Unit 2 deer  
47 population over the next 30 years due to habitat loss  
48 from prior logging, with future logging such as the  
49 proposed Twin Mountain Timber sale and severe winters  
50

1 expected to intensify these declines.

2

3

4 Predation has also been noted to  
5 influence deer numbers in Unit 2. Black bears commonly  
6 prey on fawns during the birthing season. Residents  
7 also report that deer abundance tends to decrease when  
8 wolf numbers rise and that wolf trapping can improve  
9 deer hunter success in the areas of trapping and high  
10 predator densities may depress deer populations or  
11 prolong recovery following severe winters.

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With this in mind between 1997 and 2024  
an estimated average of 1,045 Federally-qualified users  
and 950 non-Federally-qualified users harvested just  
over 2,600 deer from Unit 2 each year. The estimated  
harvest generally increased from 2006 to 2016 peaking  
in 2015 with over 4,000 deer harvested. However,  
harvest have declined well below the 2,700 animal  
objective since 2017. The lowest total harvest during  
the entire 28 year period for which we have data took  
place in 2023 and 2022 and total harvest increased  
somewhat during the 2024 hunting season. Overall there  
was a 45 percent reduction in average yearly harvest  
between that peak time from 2006 to 2016 and more

1 recently from 2017 to 2024, however, the difference in  
2 average yearly harvest between the earlier 1997 to 2005  
3 period and the more recent 2017 to 2024 is smaller,  
4 it's about 12 percent.

5  
6                 Recent declines in harvest coincide  
7 with declines in hunter numbers, reported hunter  
8 numbers as well as declines in deer harvested per  
9 hunter and declines in hunter success rate for all  
10 users. The number of days hunted per deer harvested  
11 has also increased for all users in recent years.  
12 While fewer hunters contribute to a lower harvest the  
13 increasing effort required to harvest fewer deer  
14 suggest the declining or less accessible deer  
15 population particularly in heavily used areas.  
16 Observation and knowledge shared by the Southeast  
17 Council and testifiers at Council meetings also point  
18 to a declining or less accessible Unit 2 deer  
19 population. The two buck harvest limit for non-  
20 Federally-qualified users that took affect in 2018 may  
21 have also reduced harvest for non-Federally-qualified  
22 users though it's full impact is unclear because  
23 participation in harvest by both Federally and non-  
24 Federally-qualified users have declined since this  
25 time.

26  
27                 Historically Ketchikan residents were  
28 the primary non-Federally-qualified users hunting deer  
29 in Unit 2, followed by non-resident hunters. Ketchikan  
30 residents accounted for over half of all non-Federally-  
31 qualified hunters and harvest from 1997 to 2024 with  
32 non-resident participation increasing substantially  
33 during this period. But like most other users,  
34 Ketchikan residents have also decreased their hunting  
35 and harvesting activities in Unit 2 since 2017. While  
36 deer hunting and harvest have been decreasing in Unit 2  
37 in recent years they've generally been increasing in  
38 Unit 1A. Deer populations in Unit 1A appear healthy  
39 and road construction on Ravina -- Gravina and  
40 Revillagigedo Islands have increased access.

41  
42                 So Proposals 25-04 and 26-05 ask the  
43 Board to make a Section .804 determination for Unit 2  
44 deer. An ANILCA Section .804 determination identifies  
45 which Federally-qualified subsistence users should  
46 retain a priority for the take of a limited resource  
47 when harvest restrictions are needed due to significant  
48 conservation concerns or the need to ensure the  
49 continuation of subsistence uses among a subset of  
50

1 users most dependent on the resource. Three criteria  
2 are used to make this determination: Customary and  
3 direct dependence upon the population as the mainstay  
4 of livelihood; local residency or proximity to the  
5 resource; and the availability of alternative  
6 resources. The customary and traditional use  
7 determination for Unit 2 deer currently includes all 34  
8 rural communities in the Southeast. Table 5 on Page  
9 523 of your meeting book shows recent population and  
10 economic information for these communities organized by  
11 wildlife management unit, it also provides an estimate  
12 of their distance from Unit 2. Most of the deer  
13 harvest and hunting effort, not surprisingly, in Unit  
14 2, comes from communities closest to the unit. From  
15 '97 to 2024 residents of Unit 2 and 1A accounted for an  
16 average of over 75 percent of all hunters and harvest  
17 taken from Unit 2 each year with Unit 2 residents  
18 accounting for the largest share, followed by Unit 1A  
19 residents. Unit 3 residents accounted for about five  
20 percent of hunters and harvest during this period.  
21 With more distant communities in Units 1C, 1D, 4 and 5  
22 accounting for only a small portion of overall hunting  
23 and harvest activity during this period.

24  
25 Table 7 and 8 on Pages 530 through 535  
26 show harvest and use data compiled from subsistence  
27 surveys. In units where multiple surveys have been  
28 conducted, Units 4 and 2 exhibited the highest average  
29 deer harvest per person and deer accounted for the  
30 largest share of total subsistence harvest. Similarly,  
31 communities in Units 4 and 2 generally used, attempted  
32 to harvest, successfully harvested, and shared deer at  
33 higher rates than communities in other units. Based on  
34 these hunting patterns and issues of proximity, Unit 2  
35 residents display the greatest dependence on Unit 2  
36 deer, followed by users in Unit 1A and 3. In  
37 appendices A and B break this information down by  
38 individual communities within these units.

39  
40 Criterion 3. In times of resource  
41 shortages some communities have greater access to  
42 alternative subsistence resources and store bought  
43 foods and goods and this is a consideration we make in  
44 the Section .804 process.

45  
46 So all rural residents of Units 1  
47 through 5 may hunt and harvest deer under Federal  
48 regulations wherever they apply but in practice most  
49 residents are likely limited by time and money to  
50

1 hunting in proximity -- reasonable proximity to their  
2 homes. Table 11 outlines current deer hunting  
3 opportunities under Federal regulations in Units 1  
4 through 5. This information also provides context for  
5 evaluating residents ability to meet their subsistence  
6 needs in their home units as well as potential sources  
7 of additional deer nearby and other wildlife resources.

8  
9 Unit 4 has the highest deer harvest  
10 limit under Federal regulations followed by Units 2,  
11 1C, 1A and 1B. Units 3 and 5A each only allow one buck  
12 per season and Unit 1D currently has no Federal open  
13 season. Units 2 and 4 also have the fewest alternative  
14 wildlife species available with deer being the only  
15 large ungulate available in Unit 2. Although Unit 3  
16 residents have a lower deer harvest limit in their home  
17 unit they have access to moose and elk and have  
18 historically traveled to Southern Admiralty Island in  
19 Unit 4 and portions of the mainland in Unit 1B to  
20 harvest deer. Unit 1A residents may harvest 4 bucks as  
21 well as goat, moose and black bear and also have a  
22 history of traveling to Unit 2 to hunt deer. Rural  
23 residents from more distant communities, as I said  
24 before, have not exerted much deer hunting pressure in  
25 Unit 2 over the past several decades.

26  
27 Ketchikan serves as the regional hub  
28 for southern Southeast Alaska giving residents of  
29 Ketchikan, Saxman and Metlakatla generally greater  
30 access to goods and services than Unit 2 residents.  
31 Many residents of Units 1C, 1D, 4, 5 and parts of Unit  
32 3 likely rely more on Juneau for these services. Units  
33 2 and 3 have fewer grocery stores and store bought  
34 foods are generally more limited and more expensive  
35 than in the Ketchikan Gateway Borough. Unit 2  
36 households have also exhibited some of the regions  
37 lowest median incomes and highest poverty rates during  
38 recent census periods.

39  
40 The OSM conclusion and it is a bit  
41 different than the Council's recommendation, is to  
42 oppose WP26-03 due to the existing closure and harvest  
43 limit restrictions for non-Federally-qualified users  
44 already in regulations; to support WP26-04 with  
45 modification to close only the Northwestern portion of  
46 Prince of Wales from July 24th to August 15th to non-  
47 prioritized subsistence users and reduce the harvest  
48 limit for these users to two bucks; and to take no  
49 action on WP26-05 due to the actions taken on the  
50

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1 previous two proposals.

2

3

4 Justification is that deer are the  
5 primary terrestrial food source for residents of Unit 2  
6 and they've consistently ranked among the most heavily  
7 used and shared resources here since harvest surveys  
8 began in the '80s. Reduced access to deer creates  
9 significant hardships for Unit 2 households with  
10 limited means to offset wild harvest with store bought  
11 foods. Many Unit 2 residents reported unmet  
12 subsistence users needs -- to meet their -- unmet  
13 subsistence needs for deer even before Ketchikan's  
14 rural status change and recent harvest data indicate it  
15 is taking all users longer to harvest fewer deer here.  
16 Unit 2 residents demonstrate the highest customary and  
17 direct dependence on Unit 2, live closest to the  
18 resource and generally have access to fewer alternative  
19 resources than non-Federally-qualified users residing  
20 in urban areas and nearby Federally-qualified users.

20

21

22 The long-term trend of declining deer  
23 habitat decreasing or less accessible deer populations  
24 and high hunter competition in the most road accessible  
25 portions of Unit 2 warrants adopting WP26-04 with  
26 modification. Restricting non-Federally-qualified  
27 users and non-prioritized subsistence users to the  
28 degree requested by the proponents is likely not  
29 necessary as most of the hunting pressure on Unit 2 is  
30 concentrated along roads and near communities in the  
31 area of the current early season closure to non-  
32 Federally-qualified users. The OSM modification should  
33 provide a meaningful compromise intended to promote a  
34 healthy Unit 2 deer population while ensuring the  
35 continuation of subsistence uses by residents of Unit 2  
36 without completely closing or restricting non-local  
37 hunting opportunities.

37

38

39

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

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

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Jerry.

MR. INGERSOLL: Forest Service. First  
of all, just want to acknowledge the amazing amount of  
analysis conducted in a very short period of time  
overlapping with the government shutdown. This is --

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1 this full Section 804 analysis is very impressive to  
2 have done it in record time and it's very thorough and  
3 so I want to thank Staff for that.

4

5 And then I want to ask, there was an  
6 iterative approach I understand in this between OSM and  
7 the Council, and so am I right in saying that the OSM  
8 conclusions were provided to Council before their last  
9 meeting and so the Council was then able to be informed  
10 by OSM's recommendations and develop their own final,  
11 which you didn't have a chance to review during this  
12 process, but there was a step-wise process to get to  
13 where they landed; is that right?

14

15 MR. ROBERTS: Yes. Through the Chair.  
16 We presented the OSM conclusion to the Council at their  
17 most recent meeting and they developed their own  
18 recommendation.

19

20 MR. INGERSOLL: Thank you.

21

22 CHAIRMAN CHRISTIANSON: Any other  
23 questions for Staff.

24

25 (No comments)

26

27 CHAIRMAN CHRISTIANSON: Did we receive  
28 any written public comment, thank you.

29

30 MR. ROBERTS: Yes. Through the Chair.  
31 During that initial open period for written public  
32 comments we received two comments. One supported WP26-  
33 03 and WP26-05 and did not take a position on 04. This  
34 person wrote that 03 supported that because deer  
35 populations in the most road accessible portions of  
36 Prince of Wales cannot support the current level of  
37 hunting pressure and local harvesters who primarily  
38 utilize these hunting areas are having a hard time  
39 harvesting sufficient deer. This commentor noted that  
40 for 05, he saw this as a reasonable compromise to  
41 address the situation being experienced by subsistence  
42 users on Prince of Wales without unnecessarily  
43 restricting non-local hunters.

44

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

48

49 CHAIRMAN CHRISTIANSON: Thank you.

50

1 Summary of tribal government and Alaska Native Corp.

2

3 MR. LIND: Thank you, Mr. Chair.

4 There was submission of a joint resolution 26-03 by  
5 four tribes, Craig Tribal Association, Klawock  
6 Cooperative Association, Hydaburg Cooperative  
7 Association and Organized Village of Kasaan and by  
8 reading this -- this information is also found in your  
9 supplemental materials under Tab 2. With approval from  
10 Chief Cook I'm just going to read the last part of the  
11 resolution.

12

13 It says: Now therefore, be it resolved  
14 that the four tribes hereby unanimously support the  
15 Craig Tribal Association February 28, 2025 proposal to  
16 establish differentiated deer harvest limits in Game  
17 Management Unit 2 and urge the Federal Subsistence  
18 Board to adopt these amendments.

19

20 Thank you, Mr. Chair.

21

22 CHAIRMAN CHRISTIANSON: Thank you. Any  
23 tribal or Alaska Native organization testimony.

24

25 MS. LAVINE: Mr. Chair. First in the  
26 room is Gloria Burns.

27

28 MS. BURNS: Gloria Burns, Ketchikan  
29 Indian Community President. Lifelong resident of  
30 Ketchikan. Born and raised. We submitted 05 and the  
31 reason why we submitted 05 was long before this newest  
32 iteration of attempting to have status as a Federally-  
33 qualified user we had had discussions with Craig just  
34 -- and we had heard from our relatives on the Island  
35 about the hardship that they were having as far as  
36 getting deer and there was the proposal that limited  
37 initially -- there was a time when Craig was doing a  
38 deer celebration, really coming around their deer and  
39 they were concerned just about the amount of hunters  
40 that were coming from Ketchikan and so they had wanted  
41 to limit the amount of -- and there had been a  
42 regulation that limited and said that you could hunt a  
43 certain amount in Ketchikan, if you got those then you  
44 couldn't, in turn, go over to Prince of Wales, and so  
45 we were familiar with what that looked like and then we  
46 -- when we went and pursued rural status we had the  
47 President at the time who was Trixie Bennett, stand up  
48 and say, you know, we really feel like the .804  
49 analysis is the way to address this and take care of it

50

1 so we submitted the proposal because Craig approached  
2 us and said, you know, you said that you would support  
3 us, are you going to support us and so we put that  
4 forward. Because we were hearing from people that they  
5 were not getting their catch when they went from  
6 Ketchikan over to Prince of Wales. And so when you  
7 kind of look at the numbers from 2014 to 2023 when you  
8 see a 59 percent decrease in Ketchikan hunters going  
9 over to Prince of Wales, and then you can alternatively  
10 see like a really great bag limit and a faster catching  
11 in our own Unit 1 and for us, really, what that meant  
12 were the hunters in Ketchikan both tribal and non-  
13 tribal were adjusting their hunting practices and going  
14 where it makes sense. Right now it's what a buck fifty  
15 for, you know, per shot, and so we really had to look  
16 at this is the reality. And since there seems to be an  
17 unwillingness to deal with the wolf population that the  
18 traditional and ecological knowledge of the people on  
19 that Island are making a difference, we really have to  
20 say that we maintain that the people closest to the  
21 resource need to have first access to the resource.  
22 And so we put this forward and we respect that OSM has  
23 come with a compromise but we really have to rely on  
24 the knowledge of the people who are sitting and  
25 hunting. We want access to our own land, to hunt the  
26 1,500,000 acres in Federal land on our island that  
27 nobody's making rules around and nobody's allowing real  
28 access to because the State gets to basically do what  
29 they want. And we really think that this .804 analysis  
30 and we really believe that going ahead and making the  
31 changes that Craig had recommended to us is in the best  
32 interest of the Federally-qualified user. And while we  
33 know it's going to hurt our own tribal citizens and  
34 people who have customarily hunted over on Prince of  
35 Wales, the reality is people are having a hard time  
36 feeding their family and above all else, we're trying  
37 to feed our family on our own land and they need to be  
38 able to feed their family on their land and if that  
39 means that their clan members from Ketchikan who no  
40 longer live in Hydaburg, Craig or Klawock can't hunt  
41 with them for a little bit well then so be it.  
42 Something has to come around and change.

43

44 So we're still in support of our  
45 proposal. We're in support regardless of whether  
46 anything that's going on and making sure that the  
47 people of Klawock, Hiktahunla and Kalisli have the  
48 ability to feed their families.

49

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0697

1                   CHAIRMAN CHRISTIANSON:       Thank you,  
2 Gloria. Any questions or comments, appreciate that  
3 support being a POW resident myself.

4  
5                   Next testifier Robbin.

6  
7                   MS. LAVINE: Sorry, I'm sorting through  
8 people who have signed up as representatives of tribal  
9 organizations and people who have signed up to speak on  
10 their own behalf. So I am going to move to next in the  
11 que is Clinton Cook. Thank you.

12  
13                  MR. COOK: Finally. The 100 hour wait.

14  
15                  (Laughter)

16  
17                  MR. COOK: Thank you, Federal  
18 Subsistence Members. Board Members. For the  
19 opportunity to speak on our vital resource that we rely  
20 on. We, as the Craig Tribe, we stand to support the  
21 three proposals, 03, 04, 05.

22  
23                  03 I'd like to speak a bit on as I also  
24 sit on the area committee ADF&G out of the Craig area  
25 and when we had the local ADF&G employee tell us they  
26 sold out of locking tags for non-residents at 300, they  
27 didn't know what to do. That puts immense pressure on  
28 our resource when you add that amount of people coming  
29 to Prince of Wales to harvest our deer. While Proposal  
30 04, we're also in agreement that a Section .804 review  
31 analysis of our deer should happen. I also attended  
32 the Southeast Alaska Regional Advisory Council meeting  
33 in Juneau, I don't remember the dates, but we  
34 extensively went through the deer issues with the four  
35 tribes on the Island represented, Ketchikan was present  
36 also to help make sure our harvestable deer was  
37 protected, and we appreciate what they do to make sure  
38 our rural priority for harvesting animals remains in  
39 tact. Wildlife Proposal 05 we also stand in support of  
40 that at the Craig Tribal Association. I know the OSM  
41 is not going to support or deny but we got to have that  
42 .804 analysis to make sure that our priorities are met  
43 before any outside qualified users come into our unit.  
44 That's the justifications we have.

45  
46                  And if you refer to your book on Pages  
47 520 and 521 you'll see the crash. The more specific  
48 crash I'd probably refer to as at the bottom of Page 20  
49 where everybody declined, Federally-qualified like  
50

0698

1 myself, non-Federally-qualified urban at large members  
2 of Alaska I'm assuming and the average, both in the  
3 steep descend since 2000 according to the data  
4 presented to us.

5

6 So we stand in support of these  
7 proposals.

8

9 Through the Chair, we appreciate the  
10 time spent with you and look forward to the next three  
11 or four proposals to speak on but we speak in favor of  
12 these proposals as presented.

13

14 Thank you.

15

16 CHAIRMAN CHRISTIANSON: Thank you, Mr.  
17 Cook, appreciate your testimony.

18

19 MS. LAVINE: Next in the que is Aaron  
20 Bean.

21

22 MR. BEAN: Good afternoon, Mr. Chair  
23 and Members of the Board. My name is Aaron Bean,  
24 again, here with the Craig Tribal Association. I'm  
25 speaking today on behalf of the Craig Tribal  
26 Association, one of the sovereign tribes on Prince of  
27 Wales Island and a long time proponent of the measures  
28 to conserve Unit 2 deer and protect local subsistence  
29 uses. The Craig Tribal Association strongly supports  
30 Wildlife Proposals WP26-03 and WP26-04 and urges the  
31 Board to adopt the Southeast Alaska Subsistence  
32 Regional Advisory Council's recommended modification.  
33 We also support the intent of WP26-05 and note that the  
34 Council's actions on WP26-03/04 fully address it. We  
35 ask the Board to follow the Council's recommendations  
36 rather than OSM's limited conclusions.

37

38 Deer are the single most important  
39 subsistence resource for our people in Craig, Klawock,  
40 Hydaburg, Kasaan and other Prince of Wales Island  
41 communities. Our families have relied on deer for food  
42 security in our region where store bought proteins are  
43 extremely expensive and sometimes unavailable.  
44 Traditional ecological knowledge from our elders,  
45 hunters and families along with years of public  
46 testimony at Council meetings shows a clear and ongoing  
47 decline in Unit 2 deer populations since approximately  
48 2015. Harvest data confirms this. Unit 2 has not seen  
49 a rebound in deer numbers and hunter success that has  
50

0699

1 occurred in other units 1, 2 -- or 1, 3 and 4 after  
2 recent mild winters. Local hunters are working harder  
3 than ever and struggling to meet their subsistence  
4 needs.

5  
6 This decline is driven by multiple  
7 factors including habitat loss from logging as  
8 discussed in the presentation, predation, weather and  
9 hunting pressure and competition from non-rural users  
10 is a factor which we must control. The recent change  
11 making Ketchikan a rural community has added  
12 significant new Federally-qualified subsistence users  
13 to Unit 2 without corresponding protections for local  
14 residents. As you know, our tribe, along with Shaan  
15 Seet Incorporated has requested reconsideration for  
16 that rural status change precisely because of its  
17 impacts on our deer. ANILCA Section .804 requires the  
18 Board to prioritize subsistence users based on  
19 customary and direct dependent, local residency and  
20 availability to alternative resources. The Southeast  
21 Council recommendation does exactly that through  
22 thoughtful data driven TEK and prioritization.

23  
24 I've outlined the table that the RAC  
25 went over and we -- I don't want to convolute what is  
26 being proposed but for the sake that I can say what the  
27 outcomes were, I don't know if that's appropriate  
28 because I'm not speaking on behalf of them, but on  
29 Table 14 of their meeting packet, non-Federally-  
30 qualified users limited to one buck season, starting  
31 August 15th through December 31st with Unit 2 closed  
32 August 1 through 14. I think during the meeting it was  
33 modified to July 24th through August 15th. Federally-  
34 qualified subsistence users from Units 1C, 1B, 4 and 5  
35 and Ketchikan limited to two bucks season started  
36 August 1 through December 31, closed July 24 through  
37 the 31st and January 1st through the 31st, no deer  
38 harvested. Unit 2 residents retain full opportunity  
39 and five deer and one doe October 15 through January  
40 31. This framework conserves the deer population,  
41 reduces competition and crowding, including  
42 roadblocking that our hunters have experienced and  
43 ensures the continuation of subsistence uses by people  
44 most dependent on the resources, exactly what ANILCA  
45 requires. The Council's approach also respects the  
46 non-local users still have the opportunity on State  
47 lands in other units. Our tribe has been fighting for  
48 these protections for years now. Remind everyone of  
49 the proposals submitted in 2015, WP16-01 and our  
50

0700

1 continuing ongoing work with the Unit 2 deer.

2

3

4 The Southeast Council's recommendation  
5 is balanced, locally driven solution our communities  
6 need at this time. We urge you to defer to the  
7 Council, adopt their modification, recommendation and  
8 give Prince of Wales, the Island residents a real  
9 chance at meeting our subsistence needs while our deer  
10 population continues to recover.

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

Thank you.

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

(Pause)

CHAIRMAN CHRISTIANSON: Robbin, do we have anybody else?

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

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

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

That's all I have for you and thank you

0701

1 very much, I really appreciate you guys.

2

3

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

5

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

8

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

13

14 (Laughter)

15

16 MR. ISAACS: Thank you. I am the  
17 Tribal Administrator for the Hydaburg Cooperative  
18 Association and my Tribal President wants me to share  
19 that she regrets the fact that a medical trip has kept  
20 her from being here to testify on behalf of Hydaburg  
21 Cooperative Association. Trust me, she's much better  
22 looking than me so you'd enjoy her testimony a lot  
23 better. But HCA supports WP26-03, 04 and 05.

24

25 And I want to share -- I mean you have  
26 a lot of testimony in your book, you have a lot of  
27 numbers, you have a lot of scientific knowledge that  
28 you rely on with all of the agency reports that you  
29 receive. I want to lend a little more of a human story  
30 to who we are and what we do.

31

32 A few years ago my son, one of my older  
33 boys was trapping wolves to help put food on the table  
34 and pay the bills and he said, hey, dad, do you want to  
35 go with me and, of course, any time your child invites  
36 you to go with him and do anything you say yes. Little  
37 did I know that guy could walk really fast through the  
38 woods and I was literally running trying to keep up  
39 with him but we were walking his trapping line and on  
40 his trapping line he would say, look at that, they got  
41 another one and I was like, okay, what is that, because  
42 I've never seen the effects of a wolf on the deer  
43 population in my entire life and he said, well, see how  
44 all of these bones are scattered all over and the hides  
45 spread out about 20 by 20 area and I said, yeah, and he  
46 goes, that means the wolves got them and we saw that  
47 three times on his trapping line. So not only do you  
48 have predator pressure on the deer population, you also  
49 have people that are not from our area that show up and

50

0702

1 harvest deer. We have anecdotal stories of people in  
2 Hollis waiting to board the ferry and vehicles in front  
3 of them have four and five and six deer piled up with  
4 fourwheelers in the back of their truck and you're  
5 wondering where your deer are at.

6  
7 When we don't harvest deer in our area,  
8 most notably in Hydaburg and the freezer runs out and  
9 it's time to put food on the table and you have to go  
10 to the store to buy a piece of meat it's a 45 minute  
11 drive, but I know the way your Board Chair drives it's  
12 about 28.

13  
14 (Laughter)

15  
16 MR. ISAACS: But for me, I drive the  
17 road twice a day going to work and going back home to  
18 Klawock where the actual grocery store is because I  
19 know she'll hear it, my boss, I'll tell her it takes me  
20 an hour and a half to drive home, one way. But that's  
21 a 45 minute drive, approximately 38 miles, and there's  
22 literally 99 turns in that road because my wife counted  
23 them because she used to work in Hydaburg as well.  
24 It's not a fun drive but yet think about every time you  
25 drive to Safeway, Costco, ANP, Three Bears to pick up  
26 an onion because your wife said, hey, we're having stir  
27 fry and I need an onion, it takes you an hour to go get  
28 it and an hour to come home. But then the price of the  
29 meat that you're putting on the table is three and four  
30 times what you experience here in an urban setting.  
31 And now couple that with the high unemployment.  
32 Earlier this morning you heard me testify that the  
33 unemployment is 28 percent in Hydaburg and when I  
34 checked in with my boss she said it's actually higher  
35 than that, Leslie, and I said, I know that's why I told  
36 them to look at the statistics and who's giving them to  
37 you because the unemployment rate in Hydaburg is very,  
38 very high. Some have it at almost 50 percent. And so  
39 when you're looking at trying to take care of your  
40 family you rely on subsistence ways of life, what I  
41 would just call our way of life. And as you've heard  
42 us talk about when you harvest an animal, a deer, you  
43 share it with your family so it's putting food on the  
44 table for multiple families and often times these are  
45 the families that don't have enough to go to the store  
46 and buy meat. Because quite literally if I go to work  
47 with less than a half a tank, or less than a quarter of  
48 a tank of gas in my truck I don't make it home because  
49 there's no gas station in Hydaburg. So I have to  
50

0703

1 actually plan my life around getting back to Klawock to  
2 fill up my gas tank in order just to drive to work  
3 which is two minutes away because trust me you could  
4 get across town in Hydaburg in two minutes, but if I  
5 don't make it back to Klawock, if I don't have the  
6 resources to fill up my tank to go out hunting and do  
7 these things then -- so not only am I looking at a  
8 small amount or level of income, but I'm paying \$6 a  
9 gallon for gas and I'm burning a quarter of a tank to  
10 get to Klawock to fill up my tank.

11

12 So you know I'm saying this and sharing  
13 this because this is the reality of who we are and what  
14 we do. But we've lived there for thousands and  
15 thousands and thousands of years and we're not going to  
16 go away. We will find a way to survive. But having  
17 access to these resources will make it much easier for  
18 us to survive.

19

20 And, so, again, on behalf of Hydaburg  
21 Cooperative Association, I want to be very clear that  
22 we support the rural -- we support WP26-03, 04 and 05,  
23 not that we want to exclude our friends and relatives  
24 or anybody outside of the area, it's just we have to  
25 find a way to survive where our nanas and our chanas  
26 lived so that we can raise our grandchildren on the  
27 land that their families come from so with that I'll  
28 close.

29

30 Haw'aa.

31

32 CHAIRMAN CHRISTIANSON: Thank you.  
33 Thank you for that Scooter -- I mean Leslie.

34

35 (Laughter)

36

37 CHAIRMAN CHRISTIANSON: Basketball  
38 name, Scooter.

39

40 (Laughter)

41

42 CHAIRMAN CHRISTIANSON: We used to be  
43 way faster.

44

45 (Laughter)

46

47 CHAIRMAN CHRISTIANSON: Does that  
48 conclude the tribal Native organization testimony.

49

50

0704

1 MS. LAVINE: (Nods affirmatively)

2

3 CHAIRMAN CHRISTIANSON: Thank you. We  
4 will move on to advisory group testimony, SRC, State  
5 Advisory or multiagency group.

6

7 MS. LAVINE: Mr. Chair, we received no  
8 comments on these proposals. Thanks.

9

10 CHAIRMAN CHRISTIANSON: Thank you.  
11 Public testimony here or online, please raise your hand  
12 to be recognized.

13

14 MS. LAVINE: Mr. Chair, next in the que  
15 is Ali Ginter.

16

17 MS. GINTER: Good afternoon Members of  
18 the Federal Subsistence Board, Mr. Chair, and thank you  
19 for the opportunity to speak today. My name is Ali  
20 Ginter, I am a resident of Ketchikan, a mother of four  
21 and I serve my communities in several roles including  
22 as a Councilwoman for Ketchikan Indian Community. I am  
23 here speaking on my own behalf and on behalf of my  
24 family.

25

26 Wudi Hani Yeil is my Tlingit name. I  
27 am Tlingit of the Kaachadi Clan, originally from  
28 Wrangell, and I'm also a child of the Tahltan people.

29

30 I am speaking today regarding WP26-05,  
31 04 and 03 and the proposed approach to address Unit 2  
32 deer concerns through a Section .804 prioritization  
33 analysis and harvest limitations. I want to be clear I  
34 support this proposal and I believe this is the legally  
35 appropriate avenue for addressing concerns about deer  
36 availability. Families in Craig and across Prince of  
37 Wales Island have voiced real concerns about declining  
38 deer numbers and access to an important subsistence  
39 resource. Those concerns deserve thoughtful action.  
40 At the same time families in Ketchikan also rely on  
41 subsistence resources to feed our households. For my  
42 family of six, salmon, whitefish and deer are not  
43 recreation they are meals, food security and part of  
44 how we provide for our children. That is why I  
45 appreciate this proposal, it focuses on the actual  
46 issue being raised, allocation and harvest pressure  
47 rather than attempting to strip rural status from an  
48 entire community. Revoking Ketchikan's rural status  
49 would not solve conservation concerns, it would only  
50

0705

1 harm families who depend on subsistence and create  
2 unnecessary division between Southeast communities as  
3 Ketchikan residents who are able to get their first two  
4 deers of the season in Unit 2 even prior to receiving  
5 rural status.

6  
7 This proposal is the better path  
8 because it addresses management concerns directly  
9 through the tools available to the Board while still  
10 recognizing that multiple rural communities rely on  
11 these resources as ANILCA clarifies.

12  
13 I also want to note that many families  
14 like mine are not seeking to spend significant money  
15 traveling to Prince of Wales Island to hunt deer.  
16 Ferry fares, fuel, lodging, time away from work and  
17 transport costs often defeat the purpose of  
18 subsistence. Most working families are simply trying  
19 to utilize law, opportunities -- lawful opportunities  
20 and practical ways to feed their households.  
21 Subsistence should never become a contest of one rural  
22 community versus another. We all understand what it  
23 means to stretch resources, care for family and depend  
24 on the land and waters around us.

25  
26 I respectfully ask the Board to support  
27 solutions like WP26-05, 04, and 03 that address the  
28 real management issues without punishing unrelated  
29 families or reopening rural status battles that only  
30 deepen division.

31  
32 Thank you for considering a balanced  
33 and constructive path forward.

34  
35 Gunalcheesh.

36  
37 CHAIRMAN CHRISTIANSON: Thank you.  
38 Thank you for your testimony, appreciate it.

39  
40 MS. GINTER: Thank you.

41  
42 MS. LAVINE: Next in the room is Becker  
43 -- sorry Spencer Beckham.

44  
45 CHAIRMAN CHRISTIANSON: He's fine, he  
46 shook it off. No, he's fine, he gave me the no que.

47  
48 MS. LAVINE: Okay. Then we will go  
49 online to Jessica Cox, Jessica unmute your line and  
50

1 address the Board.

2

3

4 MS. COX: Hi everyone. Thank you for  
5 the opportunity to allow me to testify publicly. My  
6 name is Jessica Cox. My grandparents were James Sline  
7 of Klawock and my grandmother was Frankie Douville  
8 Sline from Craig. This is difficult because I'm  
9 speaking a lot against my family but I'm also speaking  
10 for my family here on Prince of Wales. I'm currently a  
11 resident of Prince of Wales Island but I'm also a  
12 tribal member of Ketchikan Indian Community and I would  
13 like to support these proposals as they are written  
14 without modification.

15

16 Yesterday in public testimony it was  
17 said that Ketchikan and their grocery stores suffer  
18 when barges do not come in because of bad weather. I  
19 think that speaks in and for itself. When Ketchikan  
20 suffers the outlying communities suffer far more  
21 greatly. Ketchikan has several grocery stores, two  
22 which are national chains and two that are Alaskan  
23 chains, outlying communities, like Prince of Wales, we  
24 don't have that, and food sources here are a struggle  
25 on a good day, with good weather. Ketchikan has  
26 multiple -- I grew up going back and forth between  
27 Ketchikan and Prince of Wales Island, I understand, you  
28 know, what it means to live in both of these places and  
29 I have a lot of love and respect for Ketchikan and  
30 Prince of Wales Island. Because of that I felt the  
31 responsibility to stand up today and speak about the  
32 real consequences that Prince of Wales Island are  
33 experiencing because of the overhunting over here.  
34 With Ketchikan getting rural status I see that the  
35 impacts were felt almost immediately. The IFA was full  
36 every day, hunting pressure increased dramatically.  
37 During the morning commute to Craig you would see  
38 hunters leaving the night hunts almost on a daily  
39 basis. There would be deer carcasses frequently left  
40 on the side of the road with only the hamstrings and  
41 the backstraps removed. And I stopped and I spoke with  
42 a lot of these hunters because you can't go anywhere  
43 out there during hunting season where they're not  
44 already. I would get up at 4:00 or 5:00 o'clock in the  
45 morning, go out hunting, and they were already there.  
46 And surprisingly it's a lot of these people that aren't  
47 from the Native, you know, community, it's not against  
48 the Native community whatsoever. The non-Native  
49 community in Ketchikan is absolutely culturally  
50 connected to these food sources, that is a fact and

50

0707

1 that connection is important and it's valid, but it's  
2 also true that they don't rely on these resources to  
3 feed their families in the same way that the residents  
4 on Prince of Wales Island do. For many of these  
5 families, you know, this food is essential, it's not  
6 supplemental. Like Tribal Administrator Isaacs said,  
7 you know, we're not able to just go down to the grocery  
8 store, you know, without a 43 mile drive, instead we're  
9 out in the bay trying to catch fish because we can't  
10 afford to go on that drive every day.

11

12 I guess my final thoughts here are it  
13 might sound like just more hunting and fishing but when  
14 resources are limited, the challenges are going to be  
15 felt by the Prince of Wales residents, they're going to  
16 be the ones that feel the negative impacts, not  
17 Ketchikan.

18

19 Thank you.

20

21 CHAIRMAN CHRISTIANSON: Thank you for  
22 your testimony and calling in today. I appreciate that  
23 perspective from both places.

24

25 MS. LAVINE: Next in the que is  
26 Madeline Demaske.

27

28 MS. DEMASKE: Thank you, Mr. Chair and  
29 Members of the Federal Subsistence Board. Good  
30 afternoon. For the record my name is Madeline Demaske  
31 and I am speaking on behalf of Safari Club  
32 International.

33

34 We strongly oppose Wildlife Proposals  
35 26-03 and 26-05 which shut down or restrict blacktail  
36 deer hunting by non-Federally-qualified users on  
37 Federal public lands in Game Management Unit 2. Not  
38 only do these proposals lack Office of Subsistence  
39 Management support --sorry, it's been a long day --  
40 but they run counter to the directives set out in the  
41 Alaska National Interest Lands Conservation Act.

42

43 The Federal Subsistence Board may only  
44 close areas to non-Federally-qualified users to  
45 conserve deer populations or for the continuation of  
46 subsistence use. Neither closure criterion is met  
47 here. SCI fully understands and supports ANILCA's  
48 directive to prioritize subsistence use opportunity,  
49 however, ANILCA also preserves rights of non-  
50

1 subsistence hunters to share in hunting opportunities  
2 on public lands where the resource is healthy. The  
3 status of Sitka blacktail deer in GMU 2 do not require  
4 that non-subsistence hunting be restricted to protect  
5 the subsistence priority. Given the dense habitat of  
6 the Island, abundant surveys are difficult but deer  
7 pellet surveys provide an index of the deer population  
8 and do not indicate any conservation concerns. Harvest  
9 by non-Federally-qualified users is also strictly  
10 regulated to avoid any negative impacts on either the  
11 status of deer or subsistence use. Non-Federally-  
12 qualified users are restricted to a lower bag limit and  
13 a shorter season than Federally-qualified users.  
14 Federally-qualified users are also permitted to hunt  
15 does and are afforded the longest deer season in Alaska  
16 which extends from July 24th to January 31st. There  
17 are more opportunities afforded to Federally-qualified  
18 users in Game Management Unit 2 than any other hunting  
19 area in Alaska.

20  
21                   Unsurprisingly non-Federally-qualified  
22 users make up only four percent of overall harvest in  
23 Unit 2 with less than one percent harvesting two or  
24 more deer. Considering the small proportion of non-  
25 Federally-qualified users that harvest two or more deer  
26 restricting them to one buck would prevent  
27 approximately 18 bucks from being harvested annually  
28 because relatively few deer are harvested by non-  
29 Federally-qualified users closing Unit 2 to them is not  
30 necessary for the continued subsistence use of  
31 Federally-qualified users. Nor do the proponent (break  
32 in line) either of these arguments.

33  
34                   The proponents of Wildlife Proposal 26-  
35 03 state that the proposal is primarily intended to  
36 address competition among users. Competition is not an  
37 enumerated reason for restriction of non-subsistence  
38 uses under Section .815.

39  
40                   I hope to quickly address U.S. Fish and  
41 Wildlife Regional Director Boario's question during  
42 discussion of WP26-31 regarding Ninilchik.

43  
44                   In Ninilchik Traditional Council versus  
45 United States, the Ninth Circuit affirmed in part and  
46 reversed in part the Federal Subsistence Board's  
47 decision to impose a spike fork/50-inch restriction on  
48 subsistence use of moose in Unit 15. The Ninilchik  
49 Traditional Council argued this restriction violated  
50

1 ANILCA subsistence priority. However, the Court  
2 rejected that argument that the absolute priority must  
3 be accorded to the subsistence use of fish and wildlife  
4 and upheld this Board's interpretation of the term,  
5 priority, to allow, and I quote: The balancing of the  
6 competing aims of subsistence use, conservation and  
7 recreation while at the same time providing subsistence  
8 hunters with a meaningful use preference. They also  
9 stated -- the Ninth Circuit also stated: ANILCA  
10 provides for a number of important purposes all of  
11 which must be balanced by the Secretary of the  
12 Interior. Subsistence living, although at the heart of  
13 ANILCA is not a per se preemptive statutory priority.  
14 The Ninth Circuit's decision in Ninilchik has been  
15 interpreted to mean that although ANILCA emphasizes the  
16 importance of subsistence lifestyles, its other goals  
17 include the preservation of other opportunities for  
18 hunting. Allowing subsistence harvest and non-  
19 subsistence harvest inherently results in some measure  
20 of competition.

21  
22 There are several examples of the Board  
23 rejecting similar proposals to the ones before you now.

24  
25 For example, in January of 2023, this  
26 Board rejected three proposals that would have closed  
27 deer hunting to non-Federally-qualified users in  
28 Southeast Alaska. Each proposal stated perceived  
29 competition as the reason for requesting closure.  
30 Again, this Board rejected each proposal for failing to  
31 meet the criteria set forth in ANILCA.

32  
33 Accordingly, a closure or restriction  
34 to non-Federally-qualified users would not be necessary  
35 to ensure the continued viability of a healthy Sitka  
36 blacktail deer population in Unit 2, nor is it  
37 necessary to protect the subsistence priority  
38 opportunity.

39  
40 SCI respectfully urges this Board to  
41 reject Wildlife Proposals 26-03 and 05 because they  
42 fail to satisfy ANILCA.

43  
44 Thank you for the opportunity to  
45 comment on these proposals.

46  
47 CHAIRMAN CHRISTIANSON: Thank you,  
48 appreciate your testimony. Anybody else in the queue.

0710

1 MS. LAVINE: (Shakes head negatively)

2

3 CHAIRMAN CHRISTIANSON: Okay. That  
4 concludes the public testimony on this. Council  
5 recommendation.

6

7 MR. HERNANDEZ: Thank you, Mr. Chair.  
8 Don Hernandez for the Southeast RAC. First of all I  
9 might start off by saying that, you know, the Council  
10 reviewed a number of proposals that all related towards  
11 this .804 determination including the proposals from  
12 Ketchikan Indian Community, .803, we had our own and  
13 .804 and .805, we also included deliberations on  
14 Proposals 06 and 07, which you haven't mentioned but  
15 all of those proposals were considered in our  
16 determination on this rural prioritization. And our  
17 final recommendation is on Page 493 in your books in  
18 the form of a table, which actually makes it a lot  
19 easier to follow than what I'm going to read. I guess  
20 I also just want to preface by saying that in our  
21 recommendations, which I would strongly recommend that  
22 you follow, where we considered all of these different  
23 proposals and balanced them, differs somewhat from, you  
24 know, what other people have suggested and it differs  
25 from what the OSM's suggested modification is but we  
26 considered all of those and I really think we came up  
27 with the best balance. I just want to put that out  
28 there.

29

30 Also just to maybe summarize before I  
31 read through all the details here, it's important to  
32 note that nothing will change in this determination for  
33 hunters in Unit 2. Hunters from Ketchikan actually  
34 will have a slight benefit from what they've had prior  
35 to this determination and then other communities, and  
36 as you get further away, like the communities in Unit 3  
37 remain very close to the same, very slight reduction  
38 from what they had and the further you get away, like  
39 Units 4, 5, 1D, they're taking a little bit more of a  
40 restriction and then, of course, considering all of  
41 those we have to have more of a restriction on non-  
42 Federally-qualified than any Federally-qualified user  
43 has so that's kind of a synopsis of what we did.

44

45 Okay.

46

47 So maybe I'll start out, part of our  
48 deliberation was on Proposal WP26-03 and that's where  
49 the Council voted to support with a modification to  
50

50

0711

1 close all of Unit 2 from July 24th to August 15th to  
2 deer hunting by non-Federally-qualified users and  
3 reduce the harvest limit for non-Federally-qualified  
4 users to one buck. The original proposal was to  
5 eliminate all non-Federally-qualified users and we  
6 modified that to allow them one buck with a shortened  
7 season.

8

9

Okay.

10

11

12

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And then Wildlife Proposal 26-04, the Council also voted to support that with a modification. This proposal was to conduct the ANILCA .804 analysis for deer in Unit 2 prioritizing harvest limit and season length. The Council recommended to close all of Unit 2 from July 24th to July 31st and from January 1st to January 31st to deer hunting, Federally-qualified users from Units 1C, 1D, 4, 5 and Ketchikan and limit harvest by these Federally-qualified subsistence users to two bucks and to close all of Unit 2 from January 1st to January 31st to deer hunting by Federally-qualified subsistence users from Units 3, 1B, and the remainder of Unit 1A, which include Metlakatla and Saxman and limit harvest by these Federally-qualified subsistence users to four bucks. Like I say reading through it it sounds complicated but if you look at the graphic you'll see it's a lot easier to follow.

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

So our justification and rationale for the action that we took, Southeast Council felt that harvest and season restrictions for non-Federally-qualified users and Federally-qualified subsistence users residing outside of Unit 2 were justified due to the reports of declining deer populations and the difficulties many Unit 2 residents have been experienced in harvesting sufficient deer to meet their subsistence needs. These difficulties are due to low deer abundance as well as crowding which can lead to interference of hunting by other user groups. The Council pointed to public testimony and the OSM analysis citing substantial increases in deer hunter numbers in Unit 2 since 1997 as well as severe habitat loss due to logging which has significantly reduced deer carrying capacity. The Council felt that a one buck harvest limit would be sufficient for non-

1 Federally-qualified users given this situation because  
2 it would provide continued harvest opportunity, avoid  
3 unnecessary restrictions and would not greatly limit  
4 economic opportunities for Prince of Wales Island  
5 businesses that cater to non-local hunters. The  
6 Council also noted that there are additional  
7 opportunities for non-Federally-qualified users to  
8 harvest deer under State regulations on non-Federal  
9 lands in Unit 2 and they stated restricting non-  
10 Federally-qualified users was necessary given their  
11 recommended restrictions on Federally-qualified  
12 subsistence users via the .804 prioritization process.

13

14 Southeast Council carefully considered  
15 their recommendations on ANILCA Section .804  
16 restrictions by evaluating the customary and direct  
17 dependence of each eligible rural community on Unit 2  
18 deer as a mainstay of livelihood, local residency and  
19 proximity of each community to Unit 2 deer and the  
20 availability of alternative resources in each  
21 community.

22

23 The Council determined that residents  
24 of Units 1C, 1D, 4 and 5 do not traditionally show a  
25 high level of use for dependency on Unit 2 deer and  
26 have access to sufficient alternative resources. It  
27 was also noted that Unit 3 residents exhibit historic  
28 dependence on Unit 2 for deer harvest and a lack of  
29 alternative resources in part because Unit 3 has a low  
30 deer harvest limit, which is only two bucks, and the  
31 shortest deer season in the region which runs from  
32 August 1st only through the end of November. The  
33 Council also considered average community income and  
34 employment indicators for evaluating the availability  
35 of alternative resources when determining restrictions  
36 to Ketchikan versus nearby Unit 1A communities of  
37 Saxman and Metlakatla. They noted that Saxman has a  
38 relatively high poverty levels compared to Ketchikan.  
39 The Council also noted that the Ketchikan Indian  
40 Community recognized the need for restrictions in order  
41 to conserve Unit 2 deer and ensure the continuation of  
42 Unit 2 residents subsistence uses of deer. KIC was  
43 supportive of the Council's proposed regulations.

44

45 The Southeast Council recognized that  
46 doe harvest is fairly limited in Unit 2, but that  
47 harvest of doe harvest is a customary and traditional  
48 practice for many residents of Unit 2, providing an  
49 additional opportunity for Federally-qualified  
50

0713

1 subsistence users there to meet their subsistence  
2 needs. The Council voted to retain this doe harvest  
3 opportunity for Unit 2 residents, Unit 2 residents only  
4 while eliminating doe harvest for Federally-qualified  
5 subsistence users residing outside of Unit 2 to reduce  
6 potential impacts to the deer population. The January  
7 deer season was also retained for Unit 2 residents only  
8 for the same reasons. Testimony on Wildlife Proposal  
9 WP26-03,04 and 05 highlighted the high cost and limited  
10 amount of store bought food available on Prince of  
11 Wales Island and that many rural residents depend on  
12 securing their own protein through hunting and fishing.

13

14 The Councils actions on these proposals  
15 took this into consideration and made recommendations  
16 to restrict users based on the necessity to address  
17 conservation concerns for Unit 2 deer and to continue  
18 the subsistence uses of deer by rural residents of  
19 Prince of Wales Island. So given this, the Council  
20 took no action on WP26-05 due to our including that in  
21 the determination of the subsistence priority.

22

23 So be glad to answer any questions.

24

25 CHAIRMAN CHRISTIANSON: I'd just like  
26 to say I appreciate the work you did, you know, living  
27 in the region and then knowing that the analyst -- that  
28 you guys got to get the .804 and then look at it and  
29 work through that process and really tease out some of  
30 the bigger issues. It's kind of reassuring as well as  
31 we seen both testifiers today speaking in favor of  
32 this, being from both communities and user groups, that  
33 they found the compromise that you found in your thing  
34 and I would strongly encourage the Board to really  
35 weigh that as we make that decision today as we really  
36 have to value the work that you guys do in the region  
37 and having that firsthand account of the users and long  
38 history of doing Unit 2 stuff there, Don. I was  
39 looking at the map, it's still the same map from my  
40 subcommittee work that I did with you guys back in '06,  
41 I imagine before I was even a Board member so it's cool  
42 to see that that's still in there.

43

44 MR. HERNANDEZ: Yeah, thank you,  
45 Chairman Christianson. Yes, Tony and I worked together  
46 on a subcommittee that was formed by the Council, I  
47 think that was actually like 2004, it was like 22 years  
48 ago now where we came up with a lot of these  
49 recommendations that are still in practice at this  
50

0714

1 time. So that's when Tony and I first met. Okay,  
2 questions.

3

4

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

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MR. HERNANDEZ: Yes, you could probably  
be correct in that, I guess, depending on how you look  
at it. Only Federally-qualified users had that one day  
season open in July, the non-Federally-qualified, I  
think in regulation probably was listed as closing from  
the 1st to the 15th because prior to granting that  
additional opportunity for Federally-qualified  
subsistence users of that initial, that early season,  
the non-Federally-qualified regulation was August 1st  
to the 15th so that kind of remains the same I think.

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

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

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

MR. HERNANDEZ: I think that's right.

0715

1 MR. INGERSOLL: Okay.

2

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

6

7 MR. INGERSOLL: Sorry for my confusion,  
8 thank you, I understand now.

9

10 MR. HERNANDEZ: Yeah.

11

12 CHAIRMAN CHRISTIANSON: Did that answer  
13 your question Jerry?

14

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

16

17 CHAIRMAN CHRISTIANSON: Thank you.  
18 Okay, just making sure. This is also the opportunity,  
19 any other questions for the RAC on their  
20 recommendation.

21

22 (No comments)

23

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

26

27 MR. MULLIGAN: Thank you, Mr. Chair.  
28 For the record, Alaska Department of Fish and Game  
29 opposes the suite of proposals as we don't see them  
30 necessary under Title VIII of ANILCA for the  
31 conservation of deer populations in Unit 2 or for the  
32 continuation of subsistence uses. Currently, as you  
33 heard, in the OSM analysis there is significant  
34 opportunity for season and also bag limit for Unit --  
35 for Federally-qualified users are opposed to non-  
36 Federally-qualified users.

37

38 One thing I would like to point out  
39 that I feel is necessary is on Page 519, you'll look at  
40 that graph of harvest and our harvest objective. Now,  
41 to be specific the harvest objective that's in that  
42 graph is for our intensive management objectives, that  
43 is not for what -- or ANS, ANS is 1,500 to 1,600, which  
44 we have met every year except '23 since regulatory year  
45 '97. I just wanted to point that out. So that's for  
46 sustainability, that's not for subsistence needs,  
47 that's when we start looking at what we would need to  
48 do possibly for intensive management of that population  
49 to bring it back, not a conservation concern or a  
50

0716

1 harvest concern for folks meeting their subsistence  
2 needs.

3  
4                   You know as we look at the deer  
5 population in Unit 2, levels of harvest, as I said,  
6 it's remained stable since regulatory year and we've  
7 met that ANS, the CPUE, catch per unit effort for deer  
8 has maintained -- has been static for that amount of  
9 time and if you're looking for, you know, just parsing  
10 it out, you know, restricting this non-resident harvest  
11 only makes up roughly 4.3 percent and restricting the  
12 harvest you're only going to get a couple dozen bucks  
13 out of that closure. And as already has been  
14 mentioned, you know, that non-Federally-qualified users  
15 can already -- well, possibly still hunt on non-Federal  
16 lands, there's not much on the island but it will be  
17 there, but then also below ordinary high water is still  
18 a harvest opportunity for them as well. Not directly  
19 pertaining to our position on these proposals but just  
20 to let you know is that I know the blacktail foundation  
21 still has Forest Service money, they are raring to use  
22 on the Island to help rebound populations of the deer  
23 by doing some habitat work. I'm sure Member Ingersoll  
24 knows all about that and I talked to them quite  
25 frequently and they seem to be working with us and with  
26 the Forest Service, you know, often, to try to get that  
27 money being implemented. I think it's burning a hole  
28 in their pocket and they would really like to get that  
29 going.

30  
31                   But just overall, Fish and Game opposes  
32 these. We don't feel it's necessary at this time.

33  
34                   Thank you, Mr. Chair.

35  
36                   CHAIRMAN CHRISTIANSON: Thank you, Ben.  
37 And thank you for that statement. Go ahead, Jerry.

38  
39                   MR. INGERSOLL: Yeah, and thank you.  
40 We are working with the deer foundations and we  
41 appreciate the partnership and support. Thank you.

42  
43                   CHAIRMAN CHRISTIANSON: Yeah, I've seen  
44 those little partnerships work wonders in just creating  
45 corridors, like I mean it's just drastic improvement as  
46 far as allowing to get through that stem exclusion  
47 zones, you know, just to get them from the top to the  
48 bottom, they just weren't coming down because they  
49 couldn't get around and when they did a little bit of  
50

0717

1 that habitat adjustment stuff we seen deer start to be  
2 able to get through those stem excluded areas and it  
3 improved a little bit on ANCSA land, right, but still  
4 that's our battle, I guess, because tribal citizens is  
5 that the State lands are managed ANCSA lands and we  
6 have a large private land holding too in the area which  
7 is funny that, sometimes law enforcement's parked at  
8 the end of our own private land holding waiting on the  
9 24th to see if we're on State land or Federal land and  
10 it's still one of those things we see out there, that  
11 there is the ability to compromise our user group  
12 because on our own land we can criminalize ourself on  
13 the 24th. Just for the record, you know, you could put  
14 that out there. Because we try to avoid that here but  
15 it happens and it's a reality and we see them sitting  
16 there. So that's the kind of thing that we see.

17

18 Go ahead, Ben.

19

20 MR. MULLIGAN: Just a plug because  
21 something that hit my mind when I do have conversations  
22 with them is, you know, part of what they're going to  
23 be doing is pulling out some of that stem exclusion  
24 stage so non-traditional woody debris that needs to  
25 find a market, so if anybody on the Island has some  
26 ingenuity and some creativity and can think of a market  
27 to utilize those materials, that would help those guys  
28 out because I think that's part of what's hampering  
29 their ability to do that right now and it'll come out.  
30 So if someone wants to utilize it'll be there but I  
31 know that was kind of a place where they had some  
32 contention in doing that, is like, well, is that going  
33 to be marketable and can we move forward with it if  
34 it's not. So it's going to be there for the taking if  
35 someone can figure out a way to utilize it.

36

37 CHAIRMAN CHRISTIANSON: Thank you.  
38 We're looking for all the tools to help our landscape  
39 improve.

40

41 ISC.

42

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

45

46 The Federal Subsistence Board will need  
47 to consider a few key sections of ANILCA before taking  
48 action on proposals requesting closures and closure  
49 reviews. Specifically those actions pertaining to

50

0718

1 Council deference, Section .805(c) and those pertaining  
2 to limitations to closures or restrictions of  
3 subsistence and non-subsistence uses on Federal public  
4 lands in Sections .815(3) and .816(b). These three  
5 sections speak to the heart of Board authority and  
6 require a careful balance between the Federal priority,  
7 the continuation of subsistence uses, the necessary  
8 conservation of subsistence fish and wildlife and  
9 unnecessary restrictions.

10

11 Thank you, Mr. Chair.

12

13 CHAIRMAN CHRISTIANSON: Thank you,  
14 Robbin. That opens up the floor for Board discussion.  
15 Any other pointed questions for Council Chair or State  
16 reps, this is your opportunity to ask further  
17 questions.

18

19 (No comments)

20

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

23

24 MR. INGERSOLL: Mr. Chair.

25

26 CHAIRMAN CHRISTIANSON: Yes.

27

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

35

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

38

39 MR. INGERSOLL: Thank you. In  
40 deference to the Southeast Council and with full  
41 acknowledgement and honor of the work that they did to  
42 complete a Section .804 analysis in a really restricted  
43 timeframe and engage in dialogue and consultation with  
44 all of the affected tribal governments they have  
45 completed a tiered analysis that balances subsistence  
46 priority, conservation of the resource and providing  
47 that without fully closing to non-Federally-qualified  
48 users. That's a pretty impressive allocation of a  
49 restricted and somewhat declining resource. Not a  
50

0719

1 question of competition per se, but a question of  
2 allocation of resource to the people who need it most  
3 for food.

4

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

12

13 Thank you.

14

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

18

19 MR. PENDERGAST: Mr. Chair.

20

21 CHAIRMAN CHRISTIANSON: Yes.

22

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

26

27 MR. INGERSOLL: That's correct. It's  
28 fully reflected on the screen in front of us and on  
29 Page 493.

30

31 MR. PENDERGAST: And if a Board Member,  
32 you know, there's two proposals linked up now in the  
33 motion.

34

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

38

39 CHAIRMAN CHRISTIANSON: Any other  
40 questions, clarification, discussion.

41

42 (No comments)

43

44 CHAIRMAN CHRISTIANSON: Please read  
45 into the record and roll call.

46

47 MS. LEONETTI: The motion is to adopt  
48 Wildlife Proposal 26-03 and Wildlife Proposal 26-04,  
49 both as modified by the Southeast Alaska Regional  
50

0720

1 Advisory Council and take no action on Wildlife  
2 Proposal 26-05.

3

4 Forest Service Member Ingersoll.

5

6 MR. INGERSOLL: Support.

7

8 MS. LEONETTI: Park Service Member  
9 Striker.

10

11 MR. STRIKER: Park Service supports the  
12 motion in deference to the RACs. Excellent compromise  
13 proposal. And for the reasons summarized by Regional  
14 Forester Ingersoll.

15

16 MS. LEONETTI: BLM Member Pendergast.

17

18 MR. PENDERGAST: BLM is unable to  
19 support the motion with both moving together and given  
20 the complexity of the issue trying to untangle that, I  
21 think, is not going to be advisable. But just given  
22 the -- given the closure is already codified in  
23 regulation, you know, there's some concerns on my end  
24 with 26-03 so at this time I'll just oppose the motion.  
25 Thank you.

26

27 MS. LEONETTI: Public Member Payenna.

28

29 MR. PAYENNA: Public Member Payenna  
30 supports and noting the incredible amount of work that  
31 was conducted by the RAC and in agreement with comments  
32 made by Jerry.

33

34 MS. LEONETTI: Public Member Woods.

35

36 MR. WOODS: Public Member Woods  
37 supports Wildlife Proposal 26-03 and Wildlife Proposal  
38 26-04 as modified by Southeast Council and take no  
39 action on Wildlife Proposal 26-05 for the reasons set  
40 forth, not only in the OSM summary but all the  
41 information passed on. I'd like to -- I'm trying to  
42 address the Forestry's [sic] comment that we are not  
43 actually closing, we have addressed a lot of problems,  
44 supports seasons, limits, time, area, species, gender  
45 and limiting the conflicts that are going on in this  
46 region. It is huge. So I appreciate all the work that  
47 went into this and, yeah, I support the proposals I  
48 just listed. Thank you.

49

50

0721

1 MS. LEONETTI: Public Member Oney.

2

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

6

7 MS. LEONETTI: BIA Member John.

8

9 MS. JOHN: BIA votes to adopt WP26-03  
10 and 04 as modified by the Southeast RAC and take no  
11 action on 05, which supports the Forest Service's  
12 motion. The Council worked extensively and very  
13 impressively on these proposals and developed  
14 recommendations that addresses the needs of Unit 2  
15 residents by giving them the highest priority for  
16 harvesting deer on Prince of Wales Island. Their  
17 modifications also enable rural users from Units 1A, 1B  
18 and 3A to maintain their subsistence practices, plus  
19 provide opportunity for qualified users from the rest  
20 of Unit 1 to be accorded a subsistence priority that is  
21 in line with their current harvests. The RAC's  
22 recommendation will allow sporthunters to continue  
23 taking a deer in parts of Unit 2. We concur with the  
24 justifications of the Council on their recommendations  
25 and commend them for their diligent efforts on this  
26 complex matter. Quyana.

27

28 MS. LEONETTI: Fish and Wildlife  
29 Service Member Boario.

30

31 MS. BOARIO: Fish and Wildlife Service  
32 votes to support in deference to the Southeast Regional  
33 Advisory Council and because of the justification by  
34 the Forest Service. In light of testimony heard today  
35 there is a need to provide subsistence opportunity for  
36 people of Prince of Wales Island and continue  
37 subsistence uses. The recommendations provide for  
38 harvest limits and seasons for Federally-qualified  
39 subsistence users, non-Federally-qualified users and  
40 non-prioritize (indiscernible). As outlined in the OSM  
41 analysis, the recent reductions in the number of deer  
42 harvest per year by both Federally-qualified  
43 subsistence users and non-Federally-qualified users and  
44 the increasing time required to harvest by both user  
45 groups suggests that the Unit 2 deer population likely  
46 has declined, the population is less accessible and/or  
47 competition levels are impacting harvest success and  
48 efficiency. For these reasons we support the  
49 modifications presented by the Southeast Council to the  
50

0722

1 Board and thank everyone for their great work on this  
2 as well.

3

4 MS. LEONETTI: Public Member Pitka.

5

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

9

10 I vote to support WP26-03/04 and take  
11 no action on WP26-05 in deference to the Southeast  
12 Regional Advisory Council as justified by the Forest  
13 Service and BIA. Thank you.

14

15 MS. LEONETTI: Chair Christianson.

16

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

46

47 MS. LEONETTI: Mr. Chair, the motion  
48 carries nine to one.

49

50

0723

1 (Applause)

2

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

6

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

9

10 CHAIRMAN CHRISTIANSON: Well, Ashley, I  
11 got a question here because just considering what  
12 happened, the next few proposals look to change  
13 regulation on what we just adopted. So for me I would  
14 see us just walking through something that was going to  
15 change what we're doing and what we just passed, almost  
16 unanimously, as a Board, so I would almost suggest that  
17 -- and if the Board doesn't see it that way, speak up,  
18 but that we maybe take no action on the rest of the  
19 agenda items dealing with Unit 2 deer because we just  
20 set the regulation and I'd like to see that work if  
21 that's okay and I get concurrence here, that we get a  
22 motion by the Board to take no action on the rest of  
23 the Unit 2 deer proposals based on the recent Board  
24 action we just decided on.

25

26 MR. INGERSOLL: So moved.

27

28 CHAIRMAN CHRISTIANSON: Motion's been  
29 made.

30

31 MR. INGERSOLL: Okay.

32

33 CHAIRMAN CHRISTIANSON: We got a motion  
34 to take.....

35

36 REPORTER: Who seconded?

37

38 CHAIRMAN CHRISTIANSON: Forest Service  
39 made the motion, who made a second. Frank made the  
40 second.

41

42 MR. WOODS: (Nods affirmatively)

43

44 REPORTER: Thank you.

45

46 CHAIRMAN CHRISTIANSON: There's a  
47 motion to take no action on the remaining Unit 2 deer  
48 proposals, can you read them into the record and then  
49 we'll take a vote on it. Thank you.

50

0724

1 MS. LEONETTI: I just want to confirm  
2 with Ashley that I know which proposals those are.

3  
4 MS. BULWERK: Absolutely. That's going  
5 to be WP26-06, 07, 08 and the Wildlife Closure Review,  
6 which is 01, WCR26-01.

7  
8 MS. LEONETTI: Okay. So we have a  
9 motion on the floor to take no action on Wildlife  
10 Proposals 26-06/07, Wildlife Proposal 26-08, and  
11 Wildlife Closure Review 26-01. And we'll do a roll  
12 call.

13  
14 Forest Service Member Ingersoll.

15  
16 MR. INGERSOLL: Support.

17  
18 MS. LEONETTI: Public Member Pitka.

19  
20 MS. PITKA: Support.

21  
22 MS. LEONETTI: Fish and Wildlife  
23 Service Member Boario -- oh, I'll come back to her.

24  
25 BIA Member John.

26  
27 MS. JOHN: BIA supports.

28  
29 MS. LEONETTI: Public Member Oney.

30  
31 MR. ONEY: Public Member Ray Oney  
32 supports.

33  
34 MS. LEONETTI: Public Member Woods.

35  
36 MR. WOODS: Public Member Woods  
37 supports.

38  
39 MS. LEONETTI: Public Member Payenna.

40  
41 MR. PAYENNA: I support.

42  
43 MS. LEONETTI: BLM Member Pendergast.

44  
45 MR. PENDERGAST: Support.

46  
47 MS. LEONETTI: Park Service Member  
48 Striker.

49  
50

0725

1 MR. STRIKER: Support.

2

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

5

6 MS. KLEIN: Support.

7

8 MS. LEONETTI: Chair Christianson.

9

10 CHAIRMAN CHRISTIANSON: I support.

11

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

14

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

19

20 (Off record)

21

22 (On record)

23

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

26

27 (Pause)

28

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

32

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

34

35 CHAIRMAN CHRISTIANSON: Okay.

36

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

39

40 CHAIRMAN CHRISTIANSON: Thank you.

41

42 MS. BULWERK: All right. So we're  
43 going to go ahead to WCR26-02. For the record my name  
44 is Ashley Bulwerk, I'm a subsistence biologist for the  
45 Forest Service on the Tongass National Forest. Federal  
46 Wildlife Closure Review 26-02 can be found on Page 703  
47 of your meeting book and it's a standard review of the  
48 closure of the Federal public lands in Unit 5A East of  
49 the Dangerous River from September 16th to the 30th and  
50

1 West of the Dangerous River from October 8th to the  
2 21st for the harvest of moose by non-Federally-  
3 qualified users.

4  
5 For these hunts, only residents of Unit  
6 5A, which encompasses the community of Yakutat are  
7 considered Federally-qualified subsistence users,  
8 neither of these closures impact the Nunatak Bench  
9 area. A map of Unit 5A can be found on Page 705. The  
10 annual harvest quotas for the moose hunts in Unit 5A  
11 are set in partnership with the Alaska Department of  
12 Fish and Game and once the quotas are hit, the hunts  
13 are closed using special actions within the season.  
14 Since 2017 the quota for Unit 5A East and West has been  
15 30 bull moose each. No population surveys have been  
16 conducted since 2020 and data surveys are hard to  
17 compare and condition dependent. In Unit 5A West, each  
18 year from 2012 to 2025 the moose hunt has been closed  
19 for the season prior to the end of the Federal closure  
20 which indicates that only Federally-qualified  
21 subsistence users were allowed to harvest in this hunt.  
22 In Unit 5A East, which is farther from Yakutat and  
23 harder to access, from 2012 to 2024 the moose hunt had  
24 never been closed prior to the end of the Federal  
25 closure and had only been closed prior to the end of  
26 the season once. However, in 2025 Unit 5A East closed  
27 before the end of the season, but not before the end of  
28 the Federal closure.

29  
30 The moose harvest closure has now been  
31 met twice since 2012 in that section. An annual  
32 average harvest was 21 moose. From 2018 to 2024 the  
33 proportion of moose harvested by Federally-qualified  
34 subsistence users that took place in Unit 5A East  
35 during the Federal closure ranged from zero to 50  
36 percent, averaging 39 percent.

37  
38 The OSM conclusion is to modify the  
39 closure. To rescind the closure in Unit 5A East and  
40 retain the status quo for the closure in Unit 5A West  
41 and to replace the regulatory language that says:  
42 except by residents of Unit 5A with except by  
43 Federally-qualified subsistence users. Federally-  
44 qualified subsistence users account for 100 percent of  
45 the moose harvested in Units 5A West in most years as  
46 this moose population is closely managed by harvest  
47 quotas and these quotas are quickly met in Unit 5A West  
48 usually before the end of the Federal closure to non-  
49 Federally-qualified users. Maintaining the closure in  
50

1 5A West is necessary for the continuation of  
2 subsistence uses of moose as mandated by Title VIII of  
3 ANILCA. In Unit 5A East Federally-qualified  
4 subsistence users accounted for 43 percent of the moose  
5 harvest from 2012 to 2024. In recent years, 2021 to  
6 2024, 16 percent of the overall moose harvest from 5A  
7 East has taken place during the September closure  
8 window, which equates to two to four moose each year.  
9 Modifying the closure to rescind the closure in Unit 5A  
10 East may eliminate an unnecessary restriction on non-  
11 Federally-qualified users as little Federally-qualified  
12 subsistence use harvest occurs within the current Unit  
13 5A East closure dates and in most years the moose  
14 harvest quota for Unit 5A East is not met. The  
15 majority of moose harvest by all user groups in 5A East  
16 occurs outside of the closure dates, additionally the  
17 State moose season in Unit 5A East does not open until  
18 after the Federal closure ends.

19  
20 Therefore, as the Federal Subsistence  
21 Board's policy states that Federal public lands and  
22 waters should be reopened as soon as practicable once  
23 the conditions that originally justified the closure  
24 have changed to such an extent that the closure is no  
25 longer necessary, keeping a closure in Unit 5A East  
26 during a time with no competing uses is counter to the  
27 Board's closure policy and Section .815 of ANILCA.

28  
29 Lastly, the suggested language  
30 modification for the Unite 5A moose regulations to  
31 change the language that says: residents of Unit 5A to  
32 Federally-qualified subsistence users is consistent  
33 with other Federal wildlife closures and does not alter  
34 the current C&T of this closure. The current  
35 regulatory language just implies that there's an .804  
36 restriction in a place rather than a limited C&T  
37 determination.

38  
39 Thank you, Mr. Chair. I can take  
40 questions from the Board at this time.

41  
42 CHAIRMAN CHRISTIANSON: Thank you, Ash.  
43 Any questions from the Board on this proposal.

44  
45 (No comments)

46  
47 CHAIRMAN CHRISTIANSON: Hearing and  
48 seeing none, was there any written public comment.

0728

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

11  
12 CHAIRMAN CHRISTIANSON: Thank you.  
13 Summary of tribal government and ANCSA consultation.

14  
15 MR. LIND: Thank you, Mr. Chair. There  
16 were one support and one opposed to WCR26-02.

17  
18 (Pause)

19  
20 MR. LIND: Hang on.

21  
22 (Pause)

23  
24 MR. LIND: Forgive me, Mr. Chair. The  
25 Yakutat President, during the August consultation was  
26 in support and the Sealaska was the one opposing.  
27 Thank you, Mr. Chair.

28  
29 CHAIRMAN CHRISTIANSON: Thank you. And  
30 we might want to check for clarification on that  
31 because I think Sealaska supported the community.

32  
33 MS. GREDIAGIN: Mr. Chair. We received  
34 a written comment from Sealaska Heritage on this and I  
35 don't know if you guys wanted to hear that whole thing  
36 read, similar to the AC and SRC comments but we did  
37 receive that from the Sealaska Heritage to retain the  
38 status quo.

39  
40 CHAIRMAN CHRISTIANSON: Okay, yeah,  
41 that sounds appropriate, I didn't think it was  
42 opposition. I just remembered seeing that. Thank you.

43  
44  
45 MS. LAVINE: And, yes, Mr. Chair. Any  
46 of the letters from tribes or tribal resolutions should  
47 be under Tab 2 of your supplemental material binder.

48  
49 CHAIRMAN CHRISTIANSON: Thank you. So

50

0729

1 let the record reflect. Tribal Alaska Native  
2 organization testimony here or online.

3

4 MS. LAVINE: We have Cynthia Petersen  
5 online. Cynthia.

6

7 MS. PETERSEN: Hi, good evening. Thank  
8 you for this opportunity to speak tonight. I am sorry  
9 I am not there in person, I did have to leave, I had  
10 other things obligated here back in Yakutat that I  
11 needed to attend to. I currently serve as the  
12 President of the Yakutat Tlingit Tribe and I'm here on  
13 behalf of our tribe. I want to speak specifically to  
14 Wildlife Closure Review, WCR26-02.

15

16 The Yakutat Tlingit Tribe supports  
17 WCR26-02 -- lost connection.

18

19 MS. LAVINE: Cynthia.

20

21 MS. PETERSEN: Yes, I'm sorry, I lost  
22 connection, I had to go to a better connection, can you  
23 hear me now?

24

25 MS. LAVINE: Yes.

26

27 MS. PETERSEN: Okay, sorry about that.  
28 So I want to speak on behalf of WCR26-02. The Yakutat  
29 Tlingit Tribe supports retaining the status quo across  
30 Unit 5A. I want to also state that September is not  
31 just another season on the calendar for Yakutat, it's a  
32 critical window for moose harvest for our community.  
33 In Yakutat access is very limited, weather conditions  
34 change very quickly. We do not have extensive road  
35 systems. Harvest windows are narrow and once the  
36 opportunity passes it can't be recreated.

37

38 Even modest increases in non-local  
39 hunting pressure during peak periods can have  
40 disproportionate affects in remote communities like  
41 ours. For rural residents this is not about  
42 recreation, it's about winter food security. It's  
43 about making sure that our elders have food in their  
44 freezers to last them through the winter. That our  
45 children have food on their tables for breakfast, lunch  
46 and dinner as our school cannot provide a lunch program  
47 for our students.

48

49 We recognize that this is described as

50

0730

1 a standard review, but the impacts to our community is  
2 not standard. The rural subsistence priority under  
3 ANILCA requires more than biological sustainability, it  
4 requires meaningful opportunity for Federally-qualified  
5 users.

6  
7 The Southeast Alaska Subsistence  
8 Regional Advisory Council recommends retaining the  
9 status quo. 23 public comments also supported  
10 retaining the closure. We urge the Board to give  
11 substantial weight to those recommendations and to the  
12 lived experience of the communities most directly  
13 affected, which is Yakutat.

14  
15 Beyond this specific proposal I want to  
16 speak briefly about the capacity. In remote areas like  
17 Yakutat we see several gaps in Federal enforcement  
18 presence, monitoring and maintenance of subsistence  
19 access routes. Continuing resolution from staffing  
20 instability have real impacts on the ground. When  
21 roads, trails and access points are not maintained that  
22 directly affects subsistence opportunity. At the same  
23 time we also want to be clear we support this Federal  
24 Subsistence Management System and do not support a --  
25 acquiesce to the State management. Federal management  
26 better upholds the rural priority and provides a more  
27 appropriate framework for tribal engagement. However,  
28 where Federal capacity is limited, tribal governments  
29 should be empowered as partners and stewardship. The  
30 Yakutat Tlingit Tribe is ready and capable of assisting  
31 with this such as on the ground monitoring, harvest  
32 reporting, education and compliance presence,  
33 maintenance partnerships in key subsistence areas. We  
34 are already demonstrating this through co-management  
35 partnerships with the U.S. Forest Service at places  
36 like Strawberry Point and Heinke Island. When tribes  
37 are directly engaged, stewardship improves, compliance  
38 improves and traditional knowledge is incorporated into  
39 management decisions.

40  
41 In closing, we respectfully urge the  
42 Board to retain the current closure under WCR26-02 and  
43 affirm the Federal government's trust responsibility to  
44 protect the rural subsistence priority.

45  
46 Subsistence is not theoretical, it's  
47 our daily life, it's our way of life and how we survive  
48 here in Yakutat. The decisions made here determine  
49 whether our families can continue to put traditional  
50

0731

1 foods on the table. Subsistence is not a privilege for  
2 our people, it is a Federally-protected priority and we  
3 ask that you uphold it accordingly.

4  
5 Gunalcheesh. Thank you for your time.

6  
7 CHAIRMAN CHRISTIANSON: Thank you.  
8 Thank you for the time to call in and testify today,  
9 appreciate that. That concludes our tribal Native  
10 organization testimony. Next we have Advisory  
11 group.....

12  
13 MS. LAVINE: You received no comments.

14  
15 CHAIRMAN CHRISTIANSON: No comments for  
16 that. Public testimony online or here raise your hand.  
17 We have one in the back. Matt, you have the floor.

18  
19 MR. ANDERSTROM: Good afternoon and  
20 thank you for the opportunity to speak. My name is  
21 Matt Anderstrom, I serve as the Yakutat Tlingit Tribe  
22 Food Sovereignty Coordinator. I'm the President of ANB  
23 Camp 13, Yakutat AC member, Wrangell-St. Elias SRC  
24 member and a Federally-qualified subsistence user from  
25 Yakutat.

26  
27 I'm here to express strong opposition  
28 to Proposal WCR26-02 and support maintaining status  
29 quo. I'm also the father of five children. Four of  
30 them 18 and under and my youngest is 2 months old.  
31 I've hunted in this area for about 35 years and I've  
32 taught my older children how to hunt here as well.  
33 This is not just where we gather food, it's where  
34 knowledge and traditions are passed on. Our community  
35 moose hunting, it's not a recreational activity, it's  
36 essential to our food security, our culture and our way  
37 of life. Yakutat is a remote community with a high  
38 cost of living and limited access to affordable food.  
39 This year alone we've experienced two barge  
40 cancellations that disrupted food deliveries and  
41 reduced store availability. In those moments  
42 subsistence hunting is not optional, it is critical.  
43 The current Federal subsistence priority ensures that  
44 local residents who depend on this resource have a  
45 meaningful opportunity to harvest close to home.  
46 Removing that priority would increase competition on a  
47 limited moose population and reduce that opportunity  
48 for those who rely on it the most.

49  
50

1                   We're already seeing increased pressure  
2 on this resource. In the most recent season, Unit 5A  
3 closed earlier than expected, reflecting a noticeable  
4 increase in hunting activity in that area. Local  
5 observations indicate that this increase coincides with  
6 a new air taxi service that is flying hunters in to the  
7 area and promoting access. At the same time the U.S.  
8 Forest Service rental cabins were fully booked prior to  
9 the start of the season limiting access for local  
10 residents who rely on those cabins for subsistence  
11 hunting. Unit 5A East is the primary road access  
12 hunting area for local residents reached by crossing  
13 the Dangerous River. This makes it one of the few  
14 areas where families without resources for boats or  
15 aircraft can reasonably hunt. Increased competition in  
16 this area directly reduces access and opportunity for  
17 local subsistence users. Additionally, local hunters  
18 are reporting a noticeable increase in wolf activity  
19 with wolves being observed regularly in that area.  
20 This adds further concern about pressure on the moose  
21 population and long-term sustainability. There are  
22 also gaps in recent population data for both moose and  
23 wolves in this area. Making decisions that reduce  
24 subsistence opportunity without complete information  
25 raises concern. The Yakutat Tlingit Tribe has the  
26 personnel and the capacity to assist with population  
27 monitoring and we are willing to be a part of that  
28 effort moving forward. Traveling further to hunt is  
29 not a realistic options for many households due to the  
30 high cost of fuel, time and equipment.

31  
32                   If local harvest opportunities are  
33 reduced, some families will not be able to replace that  
34 food source. This proposal raises concerns regarding  
35 ANILCA's requirement to provide a priority for rural  
36 subsistence users and to ensure opportunity for our  
37 customary and traditional uses. Removing that priority  
38 in this context undermines those protections.

39  
40                   I respectfully urge the Board to reject  
41 Proposal WCR26-02 and to uphold the Federally-qualified  
42 subsistence priority in Yakutat and maintain the status  
43 quo.

44  
45                   Thank you.

46  
47                   CHAIRMAN CHRISTIANSON: Thank you,  
48 Matt. Any questions from the Board for Matt.

0733

1 (No comments)

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CHAIRMAN CHRISTIANSON: Thank you, and appreciate Yakutat and the cultural camp there this summer. It was wonderful to get to know the community and see that they truly do an extraordinarily subsistence lifestyle there being rural and limited. Thank you.

MS. LAVINE: Next in the queue is Sasha Anderstrom.

MS. ANDERSTROM: Hi, can you hear me.

CHAIRMAN CHRISTIANSON: Yes, you have the floor.

MS. ANDERSTROM: My name is Sasha Anderstrom, I'm from Yakutat, Alaska. I am the ANS Camp 13 First Vice President and also on the Tlingit and Haida Community Council here and I am also ANS Grand Camp Sergeant at Arms. I'm here talking on behalf of myself today in support of maintaining the status quo in Unit 5A for moose hunting.

The RAC Board, you know, they support maintaining the status quo as well. Fish and Game has not done any wildlife studies in the area since 2020 and so they haven't been able to verify, you know, if we have an issue with our population or not, especially with the wolf issues that we've had here, you know, climate changes, we've got the water table rising in our fields, which also adds to making it harder for our hunters to get to the moose, they have to go farther out, it becomes more expensive.

You know on the East side where OSM has recommended that we change it, this is -- you know, they mentioned that there's only maybe two to four moose harvested by the Federally-qualified subsistence users in that area. Four moose make a big difference for our community, that can feed a lot of people. And when we have somebody flying in hunters, when they did that this last season, they closed our season very quickly. And when they can do that starting at the same time as the, you know, Federally-qualified guys, they may not be able to get anything. That's taking the opportunity from them and then they're going to be potentially fighting for those same 30 moose on the

0734

1 West side that, you know, 60 other guys are already  
2 fighting for and there's only 30 total. There's no  
3 complete closure there to non-qualified users, we're  
4 just giving everybody that's a Federally-qualified  
5 subsistence user a shot, you know, what's four moose to  
6 them, it's nothing but it's everything to us here.

7

8 So I guess that's all I have today.

9

10 CHAIRMAN CHRISTIANSON: Thank you.  
11 Thank you for taking your time to call in and testify.  
12 Any other.

13

14 MS. LAVINE: (Shakes head negatively)

15

16 CHAIRMAN CHRISTIANSON: Thank you.  
17 That concludes our public testimony. Council  
18 recommendation on this.

19

20 MR. HERNANDEZ: Thank you, Mr.  
21 Chairman. Don Hernandez for the Southeast RAC. Our  
22 Council voted to retain status quo on this closure  
23 review for the harvest of moose by non-Federally-  
24 qualified users on Federal public lands in Unit 5A from  
25 September 16th to September 30th East of the Dangerous  
26 River and from October 8th to October 21st on the West  
27 side of the Dangerous River.

28

29 The Council heard significant tribal  
30 and public testimony supported by local knowledge  
31 regarding the use and importance of moose hunting for  
32 local Federally-qualified subsistence users in both  
33 Unit 5A West and Unit 5A East. This testimony  
34 emphasized the need to maintain the closures in both  
35 areas to help Federally-qualified subsistence users  
36 meet their needs for moose in an area where the price  
37 of store bought foods can be prohibitive and hunting  
38 competition from non-local users has been increasing.  
39 Council members and testifiers noted that air taxi  
40 services have recently expanded into areas historically  
41 relied upon by local families and they expected non-  
42 local competition for moose to continue and increase in  
43 the area as a result.

44

45 Though Federally-qualified subsistence  
46 users typically utilize the moose hunt in the more  
47 easily accessible Unit 5A West, testifiers noted that  
48 there are portions of Unit 5A East that are relatively  
49 accessible without a plane and these areas are a very

50

0735

1 important safety net for local hunters who are unable  
2 to harvest a moose within Unit 5A West. Further,  
3 testifiers voiced concerns over the lack of recent  
4 population surveys for Unit 5A moose explaining that  
5 locals had difficulty finding enough moose to meet  
6 their harvest quota in the previous season due to a  
7 significant increase in the population of wolves in the  
8 area. The Council also explained that while a Federal  
9 closure of Unit 5A East does not currently overlap with  
10 the State moose season in this area, there was no  
11 guarantee that the Board of Game would not expand the  
12 dates of that hunt in the future and if this were to  
13 happen it would be likely that better equipped non-  
14 local hunters would largely out compete local hunters  
15 for moose in this area.

16

17 So the Council stated that their  
18 support coincides with the considerable public and  
19 tribal testimony that was in support of retaining this  
20 closure to ensure much needed access to the resource by  
21 Federally-qualified subsistence users. Local TEK  
22 supports the need for this closure. Local residents  
23 consider there to be a conservation concern especially  
24 in light of recent increases of non-Federally-qualified  
25 users in the region. Retaining this closure will be  
26 beneficial to subsistence users. The Council felt that  
27 this closure would not unnecessarily restrict non-  
28 Federally-qualified subsistence users.

29

30 And just maybe a little bit more on  
31 that.

32

33 We did hear a lot of testimony on this  
34 wildlife closure as I guess we hear on all wildlife  
35 closures, you know, from the local users and I think I  
36 would have to say that the Council was very influenced  
37 by that testimony. You know, we felt that the local  
38 knowledge that we heard of just how -- especially in  
39 relation to this East of the Dangerous River, was  
40 really a lot more informative than anything we could  
41 gather from, you know, the statistics and published  
42 information. It was just -- it was really detailed and  
43 valuable information to the Council. So I just wanted  
44 to make that note.

45

46 CHAIRMAN CHRISTIANSON: Thank you, Don.  
47 Any questions for the RAC Chair.

48

49 (No comments)

50

0736

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

3

4 MR. MULLIGAN: Thank you, Mr. Chair.  
5 For the record, the Alaska Department of Fish and Game  
6 supports the OSM modification to only lift the closure  
7 in the portion of 5A. As you've heard from the OSM  
8 analysis, we rarely see the harvest objective being met  
9 in that area. Even if you do lift the closure there  
10 are still an additional two weeks on the front end  
11 where the State season does not start and also if you  
12 do choose to lift that portion, no additional harvest  
13 will go beyond the quota that we're already  
14 establishing under our registration permits. So it'll  
15 stay sustainable because it's not a harvest ticket,  
16 it's a registration, we establish that quota and in  
17 that -- in that area we have a three day reporting  
18 requirement so we keep tabs on that fairly quickly as  
19 folks are coming out of the field and believe that we  
20 can manage that without overharvesting.

21

22 Thank you.

23

24 CHAIRMAN CHRISTIANSON: Thank you, Ben.  
25 Question.

26

27 MR. INGERSOLL: Yeah, question for you.  
28 My understanding is the State season doesn't begin  
29 until October 1st, is that correct?

30

31 MR. MULLIGAN: That is correct, Member  
32 Ingersoll.

33

34 MR. INGERSOLL: And the current Federal  
35 closure is from September 16th to September 30th, so  
36 rescinding that closure, would that affect non-  
37 Federally-qualified users?

38

39 MR. MULLIGAN: I guess I'm -- let's --  
40 I'm getting -- I'm confused on what exactly you're  
41 asking?

42

43 MR. INGERSOLL: The closure doesn't  
44 coincide with the State season so I guess I'm a little  
45 confused as to how rescinding the closure would create  
46 this extra use?

47

48 MR. MULLIGAN: Well, it's still -- I  
49 mean it doesn't overall of the season but part of the  
50

0737

1 season so you would have folks able to come in during a  
2 portion of that because it's an October 1st through  
3 November 15th and I believe the closure currently is --  
4 oh, that's true.

5

6 MR. INGERSOLL: See, I don't think that  
7 the closure actually overlaps with the season.

8

9 MR. MULLIGAN: No. Sorry, I stand  
10 corrected, sir.

11

12 MR. INGERSOLL: Thank you.

13

14 MR. WOODS: Mr. Chair. I concur with  
15 the Forestry Department, that maybe it's -- so my  
16 understanding is you have a State hunter, registration  
17 permit number 50 or whatever it is, and then that  
18 season is open until closed?

19

20 MR. MULLIGAN: Member Woods. No, we  
21 have a set -- it's not -- may be announced or until  
22 closed. In our regulations it's October 1st to  
23 November 15th. But if we hit that quota before the end  
24 of the stated season length we have to close before the  
25 November 15th end date no matter.

26

27 MR. WOODS: Okay.

28

29 MR. MULLIGAN: So we could possibly go  
30 to the end of the season stated in our regulations but  
31 if we hit the quota we would close before that date?

32

33 MR. WOODS: No, thank you for that  
34 clarification and also the quota would help stir [sic]  
35 my decision. Thank you.

36

37 CHAIRMAN CHRISTIANSON: ISC.

38

39 MS. LAVINE: Thank you, Mr. Chair. The  
40 Federal Subsistence Board will need to consider a few  
41 key sections of ANILCA before taking action on  
42 proposals requesting closures and closure reviews.  
43 Specifically those sections that speak to the heart of  
44 Board authority and require a careful balance between  
45 the Federal priority, the continuation of subsistence  
46 uses; the necessary conservation of subsistence fish  
47 and wildlife and unnecessary restrictions.

48

49 The ISC acknowledges the Council's

50

0738

1 comments and tribal members testimonies both containing  
2 local knowledge and observations that provide valuable  
3 insights. The evidence presented suggests that there  
4 continues to be conservation concerns for moose in Unit  
5 5A West and though the increase of fly-in hunting  
6 observed in 2025 by non-Federally-qualified users has  
7 not yet resulted in conservation concerns for moose or  
8 significantly impacted the continuation of subsistence  
9 users of moose in Unit 5A East, Federally-qualified  
10 subsistence users are concerned that it may eventually  
11 reduce moose numbers in Unit 5A East to the point that  
12 subsistence uses will be negatively impacted. The ISC  
13 suggests the Council's recommendation to retain a  
14 closure in Unit 5A East may not meet the criteria for  
15 deference.

16

17 Thank you, Mr. Chair.

18

19 CHAIRMAN CHRISTIANSON: Thank you,  
20 Robbin. This is our opportunity for Board discussion  
21 with the Council Chair and Liaison.

22

23 (No comments)

24

25 CHAIRMAN CHRISTIANSON: Open the floor  
26 for Board action. Jolene, you have the floor.

27

28 MS. JOHN: Jolene, BIA. I did have a  
29 question, was curious after hearing the reports and  
30 wanted to ask Southeast Chair, Don, if you received any  
31 evidence or testimony from the tribal members or the  
32 area users, if their -- through the increased  
33 sporthunters that are arriving, if it's affecting  
34 already the subsistence user's ability to harvest  
35 moose?

36

37 MR. HERNANDEZ: I would say, yes, that  
38 was kind of the focus of a lot of the testimony and,  
39 yeah, there were a number of factors that they told us  
40 about and, you know, the increase in -- recent increase  
41 in fly-in hunting, which is kind of hard for locals to  
42 compete with because they can't afford, you know, that  
43 kind of expense to go out and hunt and, you know, they  
44 also depend on using some Forest Service cabins in the  
45 vicinity that get booked up like -- I think the  
46 characterization was that, you know, you can book a  
47 cabin I think on like January 1st or something and  
48 quite often these cabins will all be reserved like  
49 within a matter of minutes; things like that. And it  
50

0739

1 just kind of makes it hard to compete with, I guess, is  
2 the proper term, so, yes.

3

4

5 MR. PENDERGAST: Mr. Chair. Not a part  
6 of the world I'm intimately familiar with so trying to  
7 understand the facts on the ground. This is Kevin with  
8 BLM. Current closure in 5A East is September 16th to  
9 September 30th, and maybe this is a question to the  
10 Council, but, who is that closed to, the State hunt  
11 doesn't open until October 1st? So I mean I appreciate  
12 and acknowledge the passion around the issue but I  
13 think it's also important we separate fact from  
14 perception here as far as the actual dates.

14

15

16 MR. HERNANDEZ: So there's two areas in  
17 question here, the East side of the Dangerous and the  
18 West side of the Dangerous River and I think they got  
19 different closures you have to look at closely. I  
20 think the one that's most in contention is East of the  
21 Dangerous River which is further away from Yakutat. I  
22 think most people are agreeing to retain that closure  
23 and on the West closer to Yakutat. So on the East  
24 side, on the State regulations it does say October 1st  
25 is the opening and then you go back -- where is that  
26 one -- where is the East side mentioned -- yeah.

26

27

28 MR. PENDERGAST: It's late in the day  
29 to be doing calendar math, I apologize.

29

30

31 MR. HERNANDEZ: Yeah, I know.

31

32

33 MR. PENDERGAST: But, I mean, your  
34 question, Jerry, got me thinking. I think it's  
35 possible -- actually I think there is no -- effectively  
36 no closure in place in 5A East.

36

37

38 MR. INGERSOLL: My understanding is  
39 that the current Federal closure in 5A East is during a  
40 period that the State hunt is open so the current  
41 closure in 5A East does not close anything to anybody  
42 who could legally hunt and rescinding it would have no  
43 impact on anybody, and, that's said with all respect to  
44 the care that people have over who's using the resource  
45 and when but I think there may be a misunderstanding of  
46 what is currently closed and for whom.

46

47

48 MR. PENDERGAST: And I think that's  
49 right. And I'm getting up to speed along with the rest  
50 of the body here on this, but, that would seem to me to

50

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1 be an important point in this discussion.

2

3 MR. WOODS: A simple.....

4

5 CHAIRMAN CHRISTIANSON: One second,  
6 Frank. Ben wanted to be recognized and then Frank.

7

8 MR. MULLIGAN: Thank you, Mr. Chair.  
9 Yeah, I think what happened with us is, you know, we  
10 were looking at the whole area and the original closure  
11 review and we're looking at that October date and then  
12 we went through OSM's history and looking through our  
13 own and we couldn't even find where we had a September  
14 hunt historically. So just for the record the closure  
15 as we see it is September 16th to September 30th but  
16 now, for quite a few years, our hunt does not start  
17 until October 1st so technically we, as the State, do  
18 not have an open season East of the Dangerous River  
19 during the time that there is a closure.

20

21 CHAIRMAN CHRISTIANSON: Is there a  
22 Federal opportunity at this time -- there is a Federal  
23 opportunity so that's, I think, what we're getting at.

24

25 MS. LEONETTI: Lisa Grediagin has an  
26 answer.

27

28 CHAIRMAN CHRISTIANSON: So Frank next  
29 and then we'll call on Lisa.

30

31 MR. WOODS: No, I just need some  
32 clarification on the comment of time, because it's open  
33 until closed, the way I read it, and then a quota  
34 system, the motion that we're going to pass will  
35 clarify that language, at least in my brain, that after  
36 the quota is met then we have 5A East would be open  
37 until closed, right, and that would be a biological --  
38 biologist decision, when it gets up to 25, 30, right,  
39 so at that point we -- we utilize that same quota in  
40 our area for certain areas so as soon as we get to the  
41 threshold cut it off and it doesn't -- then it's  
42 closed, right, your biologist has the discretion to --  
43 when it gets close to that 30 permits and that quota  
44 system, at least the biologist has the option to close  
45 the season. So, thank you.

46

47 CHAIRMAN CHRISTIANSON: Okay, I got a  
48 closure going on upstairs.

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(Laughter)

CHAIRMAN CHRISTIANSON: I'm sorry.

MR. PENDERGAST: Well, you know, I'll just observe, for the record Kevin with BLM, that I think the fact of the matter is that there is no closure in place as a practical matter of fact in 5A East presently and in 5A West there's a one week -- one week at the beginning of the State season that is closed, that's the overlap there.

MS. GREDIAGIN: Thank you, Mr. Chair. This is Lisa Grediagin. And, yeah, I was just hoping to add a little bit of clarity to this question. And so this closure has been in regulation since 1991. It's gone through a lot of iterations on changing dates, dividing hunt areas. And so in 2018 the Board adopted the current closure dates of the September 16th to 30th in Unit 5A East and then that same year, later in 2018, the Yakutat AC had submitted a proposal to the Board of Game and then the Board of Game adopted a season date of starting at October 1st. And so this current iteration of this closure has been in regulation since 2018. And I think just through this last closure review is when OSM kind of realized that difference in State dates versus Federal closure dates. But I also wanted to just make the Board aware that this is not the only Federal closure where a State hunt is closed. You guys just voted to retain status quo on WCR26-18 for sheep in Unit 23 and that was due to severe conservation concerns for the sheep population even though the State hunt has been closed since 2014. And so it's definitely something to consider but I think this question on whether Federal closures during times -- you know, and another example is just what you did on the Unit 2 deer hunt where in regulation now it will say, Federal public lands are closed to non-Federally-qualified users from July 24th to August 15th even though the State hunt doesn't open until August 1st, you know, but we're still closing that time in July to non-Federally-qualified users when the State hunt is closed.

And so I understand the Council's and the users concerns that if this closure is lifted then it opens up the possibility of a State hunt whereas now I don't know if anyone is going to try to submit a proposal to open up a State hunt but hopefully that

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1 explains a little bit of the regulatory history on how  
2 this came to be, a little context on -- this isn't  
3 unprecedented to have a closure to non-Federally-  
4 qualified users when the State hunt is closed.

5

6 Thanks.

7

8 MR. PENDERGAST: This is Kevin with  
9 BLM. Then I need to ask you what you think the  
10 biological purpose of such a closure would be if  
11 there's no open hunt?

12

13 MS. GREDIAGIN: I mean speaking from  
14 OSM's perspective we supported rescinding this closure  
15 because harvest quotas were not being met and as far as  
16 retaining it when the State hunt is closed -- I mean I  
17 guess I'd have to think more about that because I think  
18 OSM was focused more on the quotas not being met and  
19 then getting more input from the Councils and the  
20 users, which we've heard pretty extensively on how  
21 important this hunt is to them and so I think --  
22 frankly I was reviewing the OSM justification that we  
23 needed to get more input from the Southeast Council on  
24 this and I think we just failed to update our  
25 justification after that. But I think after all the  
26 testimony we heard from the Yakutat residents and  
27 tribal representatives it's pretty clear this is an  
28 extremely important hunt for them.

29

30 I'm sorry, that maybe didn't directly  
31 answer your question.

32

33 MR. PENDERGAST: No, that's fair. I'm  
34 not trying to put you on the spot, I'm just trying to  
35 formulate my own thinking around the issue. Thank you.

36

37 MS. JOHN: Yeah, Mr. Chairman. This is  
38 going back to my earlier question and then reading this  
39 here. To maintain closure in both areas to help  
40 subsistence users meet their needs for moose and then  
41 air taxi service have recently expanded into the area,  
42 certainly would help this Board to have some kind of  
43 evidence that sportshunting is now affecting the  
44 ability of the subsistence users to harvest moose in  
45 order to justify maintaining the closure. I was hoping  
46 that the Council could speak to that then maybe  
47 something we need to consider trying to solidify here.

48

49 MR. HERNANDEZ: I'm sorry, Jolene, I

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0743

1 was reading through the regs here trying to make sense  
2 of this. What was that question again?

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MS. JOHN: I guess my main point is at some point it would be great if we could have some sort of evidence that subsistence users ability to hunt moose is being impacted by the increasing number of air taxi clients in order for us to really justify a closure in the future.

MR. HERNANDEZ: Okay. I would say that right now that's just anecdotal information, it would probably take some other kinds of investigations to quantify that, I guess, yeah. Something that might come out in the future though, yes.

MS. JOHN: Thank you.

MR. WOODS: So Mr. Chair, maybe for the RAC. Good work, a lot of work, the dates aren't important for me, but modify -- so OSM conclusion is to modify the closure -- rescind the closure for Unit 5A that has a 30 quota number, we keep it open, we want to open it up until that number gets set and it would be closed after -- whenever the biologist agrees, okay, we're close enough and whether we put dates on it it could be a Board modified proposal to set those numbers and dates and it would just clarify a passing of this Council, we're doing our due diligence to open or rescind a closure with a hard number, date or no date. Good catch Forestry.

There's nothing in writing right now.

There's nothing in writing right now that clarifies in my mind how we're supposed to manage and regulate that hunt other than the State's RM061, which isn't clear enough for me, it's beyond them dates. The second part is if we open it, it's going to be opened until closed, when you hit that 30 number and we're already doing that anyways, so I don't know maybe it's missed communication.

CHAIRMAN CHRISTIANSON: Frank, I think it isn't opened until the 1st anyway. So we're talking about a window that's closed and there is no hunting during that time, there is no open date, not Federally and not by the State so that's kind of why we're saying that it's kind of a moot subject but, you know, I could

1 also see the concerns of the local residents there,  
2 right, what we're hearing in testimony but as far as  
3 the opportunity. I guess the only fear would be that  
4 the State opened it up earlier or something but that  
5 would have to go through the wildlife proposal process  
6 and a public process and someone would have to be the  
7 champion of all that stuff, which, I don't think is the  
8 intent here and I'm not hearing that and it's managed  
9 by quota and a tight restricted window by the State,  
10 not the Federal Board. So I was just.....

11

12 MR. MULLIGAN: You got it Mr. Chair. I  
13 mean we don't -- it's not opened until closed, I mean  
14 Member Woods, that October to November timeframe is  
15 set. The quota applies there. And that changes based  
16 off of our adaptive management strategy of looking at  
17 the population. So for the State in 5A East October  
18 1st, that season opens for non- -- under State  
19 regulations, which could be Federally-qualified or non-  
20 Federally-qualified and if we do hit that quota before  
21 the November 15th we will shorten that season, if we  
22 don't hit it and we go all the way to November 15th,  
23 regardless of whether there's animals still left on the  
24 table, it shuts down on that date no matter what right  
25 now. And it would take, like Chair Christianson said,  
26 it would take a proposal to the Board of Game in order  
27 to change that and we recently just had our Southeast  
28 meeting in Wrangell and so those cycle every three  
29 years so we wouldn't be changing anything for a few  
30 more years, even if we wanted to.

31

32 MR. WOODS: That clarified, thank you,  
33 Ben.

34

35 CHAIRMAN CHRISTIANSON: I think we  
36 talked this one up and down, I don't want to call for  
37 question, I think we could just call for read it into  
38 the record.....

39

40 MS. LEONETTI: We need a motion.

41

42 CHAIRMAN CHRISTIANSON: I mean a motion  
43 so we can read it into the record.

44

45 (Laughter)

46

47 MR. INGERSOLL: There we go. Mr.  
48 Chair, Forest Service moves to modify the closure by  
49 rescinding the closure for Unit 5A East and retaining  
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0745

1 the status quo in Unit 5A West and to clarify the  
2 regulatory language as recommended by Office of  
3 Subsistence Management. If I get a second I'll explain  
4 why I intend to support this motion.

5

6 MR. PENDERGAST: BLM seconds.

7

8 MR. INGERSOLL: Thank you. Mr. Chair,  
9 in Unit 5A West I think there is agreement that the  
10 closure is still needed, that it reflects a genuine  
11 conservation concern. The State supports retaining  
12 that closure. And in practice that hunt is used 100  
13 percent by Federally-qualified users. On the other  
14 hand, in Unit 5A East, the current closure does not  
15 actually close anything. It is moot. It closes a  
16 period of time that is not open to hunt and the  
17 evidence is that in most years, in many years, that  
18 quota is not fulfilled even by the end of the State  
19 season so there is no evidence to suggest that we need  
20 the closure and the closure, in fact, has no effect.

21

22 Thank you.

23

24 CHAIRMAN CHRISTIANSON: Deliberation.

25 Discussion.

26

27

28 (No comments)

29

30 CHAIRMAN CHRISTIANSON: Please read  
31 into the record and roll call.

32

33 MS. LEONETTI: Okay. The motion is to  
34 modify the closure, which is Wildlife Closure Review  
35 26-02 as recommended by OSM.

36

37 Forest Service Member Ingersoll.

38

39 MR. INGERSOLL: Support.

40

41 MS. LEONETTI: Public Member Pitka.

42

43 MS. PITKA: I support, thank you.

44

45 MS. LEONETTI: Fish and Wildlife  
46 Service Member Boario.

47

48 MS. BOARIO: Fish and Wildlife Service  
49 supports.

50

0746

1 MS. LEONETTI: BIA Member John.

2

3 MS. JOHN: For this proposal the BIA  
4 votes to modify the closure and rescind it for Unit 5A  
5 East and retain it for 5A West as per the OSM  
6 modification. Southeast RAC received testimony from  
7 local tribal members and residents and used this to  
8 recommend retaining this closure for both subunits. We  
9 acknowledge the concerns expressed by the Council and  
10 subsistence users regarding the potential for future  
11 affects on their moose harvests if sporthunting  
12 pressure does indeed increase. Should there be future  
13 evidence of this a request to consider these closures  
14 again would be warranted.

15

16 MS. LEONETTI: Public Member Oney.

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

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21 MS. LEONETTI: Public Member Woods.

22

23 MR. WOODS: Public Member Woods moves  
24 to support.

25

26 MS. LEONETTI: Public Member Payenna.

27

28 MR. PAYENNA: I support also.

29

30 MS. LEONETTI: BLM Member Pendergast.

31

32 MR. PENDERGAST: BLM supports WCR26-02  
33 as modified by OSM to rescind the closure in Unit 5A  
34 East and retain the status quo for the closure in Unit  
35 5A West for the reasons stated by the Forest Service.

36

37 MS. LEONETTI: Park Service Member  
38 Striker.

39

40 MR. STRIKER: Park Service supports.

41

42 MS. LEONETTI: Chair Christianson.

43

44 CHAIRMAN CHRISTIANSON: I oppose in  
45 deference to the RAC.

46

47 MS. LEONETTI: Mr. Chair, the motion  
48 passes nine to one.

49

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0747

1                   CHAIRMAN CHRISTIANSON: Since it was  
2 moot. Next one, wolf, WP26-10. This is what they call  
3 the last one (makes howling sound)

4  
5                   (Laughter)

6  
7                   CHAIRMAN CHRISTIANSON: You have the  
8 floor.

9  
10                  MR. CROSS: Thank you, Mr. Chair. For  
11 the record my name is Robert Cross and I'm the  
12 Subsistence Program Manager for the Tongass National  
13 Forest with the U.S. Forest Service. Wildlife Proposal  
14 26-10 submitted by the Craig Tribal Association could  
15 be found in Volume II on Page 627 of your meeting book  
16 and requests to establish a guaranteed 47 day wolf  
17 trapping season by changing the end dates for wolf  
18 trapping in Unit 2 from March 31st to December 31st.

19  
20                  The proponent states that rural  
21 subsistence users in Unit 2 are losing harvest  
22 opportunity due to inconsistent season management.  
23 Although regulations currently allow for a five month  
24 wolf trapping season it is frequently closed by  
25 emergency order creating uncertainty for rural users  
26 who rely on predictable harvest opportunities. Data  
27 analysis indicates that there is a harvest surplus  
28 above the established population goal of 150 to 200  
29 wolves, yet rural users are not being provided  
30 consistent access to this resource. The proponent  
31 states that establishing a guaranteed 45 day season  
32 would provide rural subsistence users of Prince of  
33 Wales Island with a reliable predictable trapping  
34 opportunity during the most productive trapping period,  
35 and that would be November through December. The  
36 proponent states that this would enhance subsistence  
37 opportunity while still maintaining sustainable wolf  
38 population management and aligns with the wildlife  
39 management goals consistent with ANILCA.

40  
41                  Wolves continue to occupy important  
42 cultural and economic roles in Southeast Alaska.  
43 Wolves are also seen as a direct competitor for Unit 2  
44 deer, which is an important subsistence resource. Long  
45 time wolf trappers and hunters that participated in  
46 recent research on the Alexander Archipelago Wolf have  
47 explained that their trapping and hunting efforts  
48 continue to be motivated by an effort to achieve a  
49 healthy balance between wolf, deer and human  
50

1 populations. Because deer are the preferred primary  
2 prey for wolves in Unit 2, harvesters often use deer  
3 abundance and difficulty of harvest as an index of wolf  
4 populations and where wolf trapping needs to occur. An  
5 over abundance of wolves can have a similar impact to  
6 an over abundance of deer hunters, decreasing deer  
7 numbers, making deer more skittish and increasing  
8 competition for those that remain. Experienced hunters  
9 and trappers explain that when wolf numbers are too  
10 high, deer numbers decrease dramatically and there is  
11 inadequate subsistence harvest. In Unit 2 this issue  
12 is compounded by black bear predation, the loss of  
13 quality deer habitat due to logging and competition  
14 from non-local hunters. Accordingly the local  
15 objective is to ensure adequate deer abundance and deer  
16 proximity to communities for subsistence harvest.

17  
18 There are two dimensions to consider.  
19 Low abundance of deer from predation by wolves and deer  
20 becoming too wary or skittish and, therefore, difficult  
21 to harvest in the presence of active wolf packs. The  
22 preferred means of maintaining a balance is by  
23 subsistence hunting and trapping in places where  
24 communities normally access and hunt deer and other  
25 ungulates for subsistence purposes. Further, the  
26 preferred method of accomplishing these objectives is  
27 through heavy trapping and hunting in these key  
28 subsistence use areas near communities on a three year  
29 cycle, in which a substantial portion of the pack is  
30 removed. Experienced trappers note that packs with  
31 adequate prey and no other source of mortality can  
32 increase in size by about 200 percent if left alone for  
33 more than three years. However, current wolf trapping  
34 and hunting regulations make this approach difficult.  
35 Experienced wolf trappers noted that one issue with the  
36 current regulation is that they are based on survey  
37 methods that tend to produce inaccurately low  
38 population estimates and it was explained that wolves  
39 tend to follow the deer on Prince of Wales Island but  
40 wolf surveying methods seem to miss key areas  
41 frequented by wolves and deer.

42  
43 So there's a very thorough regulatory  
44 history in the analysis which starts on Page 632 of  
45 your materials so I'm not going to read it all out but  
46 I'll focus on a few notable items.

47  
48 In 1993, 2011 and 2020 the Alexander  
49 Archipelago Wolf was petitioned to be listed under the  
50

1 Endangered Species Act. The Fish and Wildlife Service  
2 subsequently found that the listing was not warranted.  
3 In 1997 the Board of Game and Federal Subsistence Board  
4 adopted harvest guideline levels to manage the Unit 2  
5 wolf population which established annual harvest quotas  
6 based on wolf population estimates. And then between  
7 2013 and 2018 seasons closed early with reported  
8 harvest well exceeding quotas in some years. In 2019  
9 the Board of Game established the Unit 2 wolf  
10 population objective range of 150 to 200 wolves and  
11 altered the management strategy to be based on  
12 population objectives instead of harvest quotas and  
13 harvest guideline levels. From 2021 through 2025 State  
14 and Federal wolf trapping seasons in Unit 2 were 31  
15 days closing December 15th via emergency order and  
16 special action respectively. In January of this year  
17 the Board of Game approved a change to the Unit 2  
18 population objective so it went from 150 to 200 to the  
19 new objective of 200 to 300 wolves due to improvements  
20 in wolf population estimates and to align with the  
21 current management strategy. The Board of Game also  
22 rejected proposals to extend the wolf trapping season  
23 to 45 days on Prince of Wales Island and also to add  
24 Unit 2 as an area for intensive management of wolves.  
25 Between 1997 and 2018 total trapper numbers in Unit 2  
26 ranged from four to 26 trappers per year and averaged  
27 14.5 trappers per year. Over the same period trappers  
28 living in Unit 2 accounted from 60 to 100 percent of  
29 the annual Unit 2 wolf harvest and averaged 89 percent.  
30 Most of the local non-resident harvest was by adjacent  
31 communities including Ketchikan, Petersburg, Wrangell  
32 and Sitka. From 2020 to 2024 Unit 2 trapping harvest  
33 averaged 69 wolves per year and recent estimates  
34 indicate a stable wolf population and managers consider  
35 harvest to be sustainably managed, however, levels of  
36 inbreeding still appear to be high in this population.

37  
38 So, again, from 2019 to present, ADF&G  
39 and the U.S. Forest Service manager set the trapping  
40 season based on most recent population estimates and  
41 catch rate to allow for sustainable harvest of wolves  
42 and so those population estimates are based off of hair  
43 board DNA studies run by ADF&G and that's with help  
44 from the U.S. Forest Service and also the Hydaburg  
45 Cooperative Association. And there's roughly 156  
46 sites, or 156 nodes and on each one of those nodes  
47 there's five hair boards associated with that and those  
48 go for about 10 weeks every fall to get the population  
49 estimate.  
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1 I also want to point out, there's a  
2 significant amount of ongoing research sponsored by our  
3 colleagues at the Alaska Department of Fish and Game  
4 and much of which will hopefully address concerns that  
5 we hear each year during the public meetings and also  
6 help to improve in-season management and so just a real  
7 brief summary of those.

8  
9 So one is that they're using cameras in  
10 association with the hair boards to determine hair  
11 board use rates by demographics and that's a concern  
12 that we've heard at these meetings where there's  
13 uncertainty as to whether maybe some of the age groups  
14 or sexes are not being captured on the hair board  
15 surveys as effectively as other demographics. There's  
16 also a post-doctoral research that's conducting a whole  
17 genome analysis over 500 wolves from GMUs 1 through 5  
18 to look at population structuring and then those  
19 findings will be used to investigate management options  
20 to maintain or increase genetic diversity and  
21 resilience in GMU 2 wolves and they may also learn  
22 about the number of wolves needed for a sustainable  
23 population in that area. And there's a Master's  
24 student and researchers from Canada collecting DNA from  
25 wolves in Coastal British Columbia to learn about gene  
26 flow and interbreeding between wolves in Southeast  
27 Alaska and wolves in adjacent British Columbia.

28  
29 And importantly it takes about eight to  
30 10 months to get a population estimate and so ADF&G has  
31 been sort of forced to use a single lab to process its  
32 samples and so there's newly developed markers that may  
33 allow managers to cut that processing time from months  
34 to weeks.

35  
36 And then a few more, there's a post-  
37 doctoral researcher sponsored by ADF&G that is looking  
38 at factors that that influence the current abundance  
39 modeling approach. And another sponsored PhD  
40 investigating whether images from a 100 trail cams  
41 systematically placed throughout Prince of Wales Island  
42 can be used to estimate and monitor wolf abundance.

43  
44 And then another concern that was heard  
45 is that the population estimate may not be completely  
46 accurate because of the differences in densities  
47 between Prince of Wales Island proper and the outlying  
48 islands and so there's an ADF&G sponsored PhD student  
49 that is looking up to 10 outer islands using acanine --  
50

0751

1 or using a dog to locate wolf scat and look at the  
2 differences in densities between those islands and the  
3 mainland -- or sorry, the main island.

4

5 And so I just wanted to bring those up  
6 because, you know, as you can tell there's a lot of  
7 effort by ADF&G and the Forest Service is helping where  
8 we can as well to support those efforts.

9

10 Okay.

11

12 And so the OSM conclusion is to oppose  
13 Proposal WP26-10. This proposal may decrease  
14 subsistence opportunity by shortening a potential 4.5  
15 month trapping season to 47 days, however, it's  
16 important to note that the four and a half month season  
17 has been shortened to 31 days by the State and Federal  
18 managers since 2021 to sustainably manage the  
19 population. Also based on testimony at the Southeast  
20 RAC meeting, I do believe the intent of the proposal is  
21 to actually have a minimum season length of 47 days and  
22 not to restrict the season length to 47 days. However,  
23 the establishment of a minimum season length with no  
24 harvest limit could impact the sustainability of this  
25 population. It's inconsistent with sound management  
26 principles and the conservation of healthy populations  
27 as required by ANILCA Section .802. And fluctuations  
28 in harvest effort and success necessitate the use of  
29 adaptive management.

30

31 And that concludes my presentation.

32

33 CHAIRMAN CHRISTIANSON: Thank you, Rob.  
34 Any questions from the Board for Rob.

35

36 Don.

37

38 MR. HERNANDEZ: Thank you. Through the  
39 Chair, this is Don Hernandez, Chair of the Southeast  
40 RAC. Rob, we didn't have any of the latest information  
41 from this season at our Council meeting, do you have  
42 the wolf harvest for this previous season, trapping  
43 season?

44

45 MR. CROSS: Yes, through the Chair,  
46 Chair Hernandez. So we did receive a -- what was  
47 categorized as a very preliminary wolf harvest estimate  
48 or total from the 2025 season from the Alaska  
49 Department of Fish and Game and that was from September

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0752

1 1st to -- September 1st through December 15th the total  
2 was 45 wolves for 2025 and, again, that's very  
3 preliminary.

4

5 CHAIRMAN CHRISTIANSON: Thank you. Any  
6 other questions. Was there any written public comment  
7 received.

8

9 MR. CROSS: Mr. Chair, there was no  
10 written public comment received during the open comment  
11 period.

12

13 CHAIRMAN CHRISTIANSON: Thank you.  
14 Summary of tribal government, Alaska Native corporation  
15 consultation.

16

17 MR. LIND: Thank you, Mr. Chair.  
18 During the February and April consultation sessions,  
19 Craig Tribal Association spoke in support and also  
20 submitted a joint resolution, 26-02. And they hereby  
21 unanimously supports the Craig Tribal Association  
22 proposal for a guaranteed 45 day wolf trapping season  
23 in Game Management Unit 2 and urge the Federal  
24 Subsistence Board to adopt this important regulatory  
25 change. That's all I have.

26

27 CHAIRMAN CHRISTIANSON: Thank you.  
28 Tribal leader, Alaska Native organization you have the  
29 floor.

30

31 MR. COOK: Thank you, Mr. Chair. Thank  
32 you to the Federal Subsistence Board for allowing us to  
33 speak on our rural priorities and subsistence needs.  
34 And I don't remember the guy before me but he was  
35 right, we're not trying to change the existing 130 day  
36 season, we want a guaranteed season for trappers so  
37 there's a little bit of language flawing in there, I  
38 don't know how it happened but I don't -- there's so  
39 much in the wolf thing I don't even hardly know where  
40 to start.

41

42 But I'll start with this, I also sit on  
43 the local ADF&G as I said earlier, the committee. It  
44 was disheartening to learn that the State was supposed  
45 to manage wolves from 150 to 200 wolves in Unit 2. The  
46 biologist for the State Dawson Dorf -- I can't find his  
47 name, Dorendorf, he admitted he was not managing the  
48 wolves as he was instructed to do, he was managing the  
49 wolves to a 250 to 300 count because he was afraid of

50

0753

1 the wolf being listed again as an endangered species.  
2 How is that fair to us as subsistence users when the  
3 State is flawing the numbers without even telling us.  
4 It's not okay. The bottom line is Craig Tribal  
5 Association in the end is not getting our subsistence  
6 wolf needs met for our customary and traditional uses  
7 of those wolves.

8  
9 I would like to see more data on the  
10 inbreeding. For now, to me, it's an accusation. I've  
11 never seen a five legged wolves or one with two or  
12 three years that says it's signs of inbreeding. The  
13 data's not there to prove it. So I don't think they  
14 should be talking about inbreeding if it ain't  
15 substantiated.

16  
17 The in-season co-management is a  
18 failure. We watch the weather patterns when the season  
19 opens and when the season is nearing a close I, as the  
20 tribal President, reach out to the in-season game  
21 management person who happens to be my local United  
22 States Forest Service Ranger, to ask him for extending  
23 our season due to inclimate weather conditions,  
24 hurricane force winds, freezing conditions, snowy  
25 conditions, within the same day of the email sent the  
26 answer is no, we will not extend the season so the  
27 tribe can meet their substantial -- or subsistence  
28 goals for the wolf harvest.

29  
30 Lastly, this one's -- I can't even  
31 believe this goes on, so back -- and I believe it was  
32 2023, we were worried about our outside islands and our  
33 archipelago, it ain't just Prince of Wales, we have  
34 large islands associa -- around us where we subsist on.  
35 We asked why are those islands not being counted for  
36 the wolf. We as subsistence users know how many wolves  
37 there are on these islands by the number of deer we're  
38 able to harvest basically. So instead of using  
39 traditional knowledge from various trappers and  
40 hunters, what happens, we get Barley, an Australian  
41 Shepherd that sniffs wolf poop. What a slap in the  
42 face to our traditional knowledge that we know of our  
43 own lands, our own homelands we know better. I seen  
44 the dog in Craig before I traveled to Anchorage to  
45 testify. They were having trouble getting it to load  
46 on to the boat. It's going to start its procession of  
47 sniffing wolf poop on May 8th on the outer islands  
48 instead of using the knowledge that my constituents in  
49 Unit 2 have to help us gain our subsistence goals on  
50

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1 wolf harvest.

2

3 We can go on and on and on about wolves  
4 and data and where it's been and where it's going and  
5 the bottom line is our subsistence needs for wolves are  
6 not being met due to the mismanagement of wolves in  
7 Unit 2.

8

9 Thank you.

10

11 MR. WOODS: Mr. Chair.

12

13 CHAIRMAN CHRISTIANSON: Thank you,  
14 Clint. Go ahead, Frank.

15

16 MR. WOODS: Thank you for your  
17 testimony. Have you read the -- let me see the  
18 Regional Council recommendation supports WP26-10 with  
19 modifications to keep the season and add to it, would  
20 that help meet your subsistence needs?

21

22 MR. COOK: I'm going to refer to my  
23 Chairman at the RAC too, but I believe it would help,  
24 it would be a start to give us a little lengthier  
25 season, that maybe the weather changes, we get some  
26 warm weather and we're not worried about people out on  
27 the water, you know, trying to get their wolf either  
28 trap gear in or stay out longer. So I think the  
29 extended season would definitely help our way of life  
30 to get those subsistence wolves. I don't know if it  
31 would match what we need. As the tribal President, we  
32 carry out various functions with culture every month at  
33 our tribe, we have regalia-making, languages throughout  
34 the year, and just by those numbers that we use for  
35 wolf -- my number as Craig Tribe would be upwards of 20  
36 wolves a year to meet my subsistence needs for my  
37 tribe. Multiply that times four, that's 80 wolves.  
38 There's four tribes on the Island, I can't speak for  
39 all of them. But I'd hope to think that their  
40 subsistence needs are similar to mine so I think it  
41 would enhance our numbers to meet the goal of  
42 subsistence.

43

44 Thank you for the question.

45

46 CHAIRMAN CHRISTIANSON: Thank you,  
47 President Clint.

48

49 Any other tribal or Native organization

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1 testimony.

2

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(No comments)

4

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

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8

MS. BURNS: (Coughing)

9

10

(Laughter)

11

12

13

CHAIRMAN CHRISTIANSON: Oh, there you are, sorry, there's a camera there and you're dressed in red, you were kind of -- you know how they say.

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16

(Laughter)

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MS. BURNS: (In Haida) My name is Gloria Burns. Also (In Haida) President of Ketchikan Indian Community. In Ketchikan we're seeing an increase of wolf all over the place and so as we're listening to the traditional and ecological knowledge that comes from the people closest to the land in Craig, I just want to point out that as a Federally-qualified user, Ketchikan Indian Community, in Ketchikan is not meeting our subsistence need. So I think that, you know, Craig is talking about how they need four per and what that would look on the Island well I want to say that Ketchikan has traditionally got wolf off of Prince of Wales. We have a new children's dance group and we had a canoe journey in 2027 [sic] and while I'm Haida and I prefer all of my things to be covered in sea otter, there is a very large population of Tsimshian people in Ketchikan who's clan crest and connection to the wolf is very important.

Additionally, the (In Native) Taant'a Kwaan, Teikweidi people are wolf people and rely on that. And because we've had to be creative about how we meet our traditional and customary usage and our subsistence needs, that has been done in great part by trading with the tribes on Prince of Wales to meet that need.

And so I was very disheartened as the RAC as well when I heard that they were managing above the amount of wolf for -- all of you know that when you're not eating the meat of an animal, it's a really sacred responsibility and trust that you have to go

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1 ahead and go through that process and that regalia is  
2 extremely important and precious and for any tribe to  
3 say, wait a second, it's not even just about the fact  
4 that we can't find a deer and we can't eat, but it's  
5 about the fact that the traditional regalia that we  
6 make and that we cloth our children in are not able to  
7 be met, it's a real serious situation.

8

9 And so I just want to say, you know,  
10 Ketchikan, we're the largest tribe in say Tlingit and  
11 Haida in Alaska and I would say that of the, you know,  
12 of the Tsimshian people, I think, what we have 2,000  
13 Tsimshian tribal citizens and I would say that the  
14 majority of them, you know, are not ravens or eagles,  
15 they're wolves or they're killer whales and they need  
16 access to this. And in order for them to have access  
17 to the wolves they need, we need to be able to  
18 promulgate rules on Unit 1 that encourage that and deal  
19 with what we know to be a large wolf population on our  
20 island as well and we need our neighbors who have been  
21 doing the hard work of providing that space for us to  
22 have that ability.

23

24 So I just wanted to say that Ketchikan  
25 is not meeting their subsistence need when it comes to  
26 wolves and we rely heavily on the hard work and the  
27 abilities and traditional knowledge of the people that  
28 are living on what is now in English known as Prince of  
29 Wales Island.

30

31 CHAIRMAN CHRISTIANSON: Thank you,  
32 Gloria. Any other tribal Native organization testimony  
33 today.

34

35 MR. BEAN: Good evening. Aaron Bean  
36 with the Craig Tribe again. Mr. Chair. Members of the  
37 Board. Thank you for your time.

38

39 The Craig Tribal Association strongly  
40 supports the approval of Proposal WP26-09 -- I'm sorry,  
41 wait I might be on the wrong -- okay, hang on a second  
42 -- okay, I gotcha. WP26-09 and WP26-10 and  
43 respectfully opposes the Office of Subsistence  
44 Management's recommendation to oppose them.

45

46 OSM's justification for opposition  
47 fails to address the core issue that prompted the Craig  
48 Tribe to submit these proposals to begin with. The  
49 State of Alaska has repeatedly used emergency order  
50

1 powers to close the wolf trapping season on Prince of  
2 Wales Island long before the regulatory season ends.  
3 We feel that it is patronizing and misleading to claim  
4 that these proposals decrease subsistence opportunity  
5 by shortening the potential 4.5 month season. When  
6 substantively it's been closed repeatedly long before  
7 that. In reality the season almost never open for  
8 anything close to 4.5 months because the State  
9 routinely shuts them down early. To suggest otherwise  
10 ignores decades of actual management practice and  
11 should be disregarded by the Board as a basis for  
12 denial. The assertion that these proposals are  
13 "inconsistent with current harvest management  
14 strategies" likewise rings hollow. The tribe has  
15 watched the State manage wolves on Prince of Wales  
16 Island for years and current approach has not delivered  
17 reliable subsistence opportunities for tribal citizens.  
18 Fluctuation and efforts, success, unreported mortality  
19 do not justify leaving season lengths entirely to the  
20 discretion of managers who have historically  
21 prioritized other interests, other than tribal  
22 subsistence needs. OSM's heavily reliance on the claim  
23 of "unreported and illegal harvest" is particularly  
24 alarming. We brought this up at the RAC level in  
25 Juneau this year. OSM cites a study Pearson and  
26 Russell dated from 2008 to assert that unreported human  
27 caused mortality equals 47 percent of human caused  
28 mortality. If you take a look at the study you can see  
29 that it's very flawed, it's outdated. It examines only  
30 55 radio collared wolves in Game Management 2 between  
31 1993 and 2004, well over 20 years ago. This sample is  
32 not random, it consisted of collared animals whose  
33 behavior and vulnerability to harvest may have been  
34 altered by the collars themselves. Detection of  
35 mortalities depended on location of these specific  
36 collared wolves introducing search effort and collared  
37 failure biases. The study area was limited to one  
38 island population within its own unique road access and  
39 human -- clearly using human use patterns,  
40 extrapolating 47 unreported mortality -- 47 percent  
41 unreported mortality rate from this narrow dated  
42 methodology compromised the data set to justify current  
43 Federal policy is scientifically indefensible and  
44 should be rejected on its face.

45  
46 The Board should not allow antiquated  
47 paper to override the lived experiences of the people  
48 of Prince of Wales Island. More fundamentally, it's  
49 important to note that the State of Alaska has never,  
50

1 truly fully recognized Alaska Native tribe subsistence  
2 rights. Has a documented history of criminalizing  
3 traditional Native lifeways. It's very existence -- at  
4 the very existence of the Federal Subsistence  
5 Management Program under ANILCA stems from the State's  
6 refusal to conform its Constitution to the statutes of  
7 Federal law. Congress enacted ANILCA as rural  
8 subsistence priority precisely because the State would  
9 not protect it. The failure has been repeated,  
10 confirmed by Federal courts in cases like Katie John,  
11 the Ninth Circuit held that the State's equal access  
12 provisions conflict with ANILCA and the Federal  
13 government must step in to protect subsistence uses on  
14 Federal lands and waters when the State does not.

15  
16 More recently, in August 20 of 2025,  
17 the Ninth Circuit in United States v. Alaska, case  
18 number 24-2251 reaffirmed that Federal authority over  
19 subsistence fishing on navigable waters and rejected  
20 the State's attempt to limit Federal oversight. The  
21 State petitioned the U.S. Supreme Court review, the  
22 petition was denied in January of '26. These rulings  
23 are not opinions, they are binding Federal law. OSM's  
24 process exists because the State has no business  
25 unilaterally managing subsistence resources on Federal  
26 lands in a manner that disregards ANILCA.

27  
28 Wolves hold a central part of Haida and  
29 Tlingit social organization of world views. A Haida  
30 and Tlingit society have structured moieties, raven,  
31 and wolf and eagle with specific clans and house  
32 tracing decent to the wolves. Wolves are viewed as  
33 relatives and protectors in our culture. As elders  
34 from Craig and other communities throughout Southeast  
35 Alaska describe rituals of respect. Before and after a  
36 harvest of a wolf, a hunter talks to the wolf, they  
37 explain their presence, they ask for protection, they  
38 share water and salt with the animal as it's closing  
39 its eyes or it helps -- or the person helps close the  
40 wolf's eyes. We are not poachers. So I got to say  
41 that again, we are not poachers. This is not a sport.  
42 It's an act of reciprocity. Wolves are never taken  
43 causally, the act honors the animal and maintains  
44 balance in our ecosystem, one ecosystem that is not  
45 being acknowledged now as we've testified and we've  
46 been trying to push for this for awhile, we think that  
47 there's far more wolves than what the State claims  
48 there is.

49  
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1                   These protocols reflect the ancient  
2 continuous relationship between our people and the  
3 wolves. Documented archaeologically back to the time  
4 of the mammoths on Prince of Wales Island. Approving  
5 these proposals would align Federal management with  
6 ANILCA's mandate with tribes customary and traditional  
7 uses. ADF&Gs own 2008 customary and traditional use  
8 worksheet for wolves in Game Management Unit 1, 3, 4  
9 and 5, special publication number BOG2008-09 confirms  
10 that wolves have long been taken and used for  
11 subsistence by residents of Southeast Alaska Native  
12 communities, including those areas in Craig and on  
13 Prince of Wales Island. This finding is further  
14 supported by the landmark 1946 Schmidt and Haas report,  
15 the commission of Indian Affairs, which documented the  
16 promissory rights of traditional territories of the  
17 Natives in Southeast Alaska, including the extensive  
18 use of resources throughout Prince of Wales Island by  
19 region of the ancestors. The same region by the  
20 ancestors of Craig's tribal citizens today.

21  
22                   These proposals do not undermine  
23 sustainability, they'll restore predictability and  
24 fairness to a system that has repeatedly failed  
25 subsistence users.

26  
27                   As the Southeast Alaska Regional  
28 Advisory Council has requested, we urge managers to  
29 incorporate traditional ecological knowledge and direct  
30 input from localsubsistence users when seasonlengths --  
31 when -- sorry, this isn't written right, let me read  
32 this -- we direct input from local subsistence users  
33 when setting season lengths each year. If the  
34 government had followed this directive to begin with we  
35 wouldn't be here today.

36  
37                   The Craig Tribe thanks you for your  
38 time. We ask that you please approve these proposals  
39 and doing so this will help honor ANILCA, respect our  
40 tribal sovereignty and ensures that the Federal  
41 government, not the State, fulfills its trust  
42 responsibility to protect subsistence opportunity for  
43 Alaska Native people.

44  
45                   Thank you.

46  
47                   And I'll just add that we would also  
48 like to just put a note and, I guess, mention it, that  
49 we've been in talks with OSM and the State throughout  
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0760

1 this process and one thing that I think is lacking is  
2 that resources for the tribes on Prince of Wales Island  
3 to help supplement or work with the State to gather a  
4 little more accurate data, as much as I appreciate some  
5 of the methodology that they're using, I think that  
6 there's probably better ways to be collecting this data  
7 and finding a more accurate number. I drafted a  
8 previous comment but I think it was covered in -- I  
9 don't believe adding, at the rate, historically, that  
10 has been -- that wolves are harvested, adding an  
11 additional 15 days on average would likely result in 15  
12 wolves, is still within the error bars of the State's  
13 management. So in other words, if they're managing for  
14 300 and they're harvest -- we're not harvesting  
15 anything near that, I don't see how that would be a  
16 conservation concern because I know that's one of the  
17 things in ANILCA that you guys look at is so long as it  
18 doesn't present a conservation concern but, clearly,  
19 this would fall within what the State says is out there  
20 anyway, although we disagree with the amount, we  
21 believe there's far more. Just for your information.

22

23 Thank you for your time.

24

25 CHAIRMAN CHRISTIANSON: Thank you,  
26 Aaron, appreciate your testimony. Next.

27

28 MR. JONES: Hi, thanks again, Mike  
29 Jones, Organized Village of Kasaan. Kasaan supports 47  
30 days as a start, not closing the 137 day State season  
31 and season management does not work, Kasaan needs 20  
32 wolves to meet our needs. The mismanagement to the  
33 numbers -- there is mismanagement to the numbers of the  
34 population, we believe, and there's no signs to the  
35 inbreeding and finally, let's send in the poop sniffing  
36 dog Barley and Lassie to save our subsistence needs.  
37 So that's all I got.

38

39 Thank you all so much for all your  
40 consideration and your time today. Thanks.

41

42 CHAIRMAN CHRISTIANSON: Thank you, Mr.  
43 Jones. Any more tribal or Alaska Native organizations.

44

45 (No comments)

46

47 CHAIRMAN CHRISTIANSON: Next, Advisory  
48 group, SRC, State, multiagency.

49

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0761

1 MS. LAVINE: We received no comments.

2

3 CHAIRMAN CHRISTIANSON: Thank you.  
4 Public testimony, here or online, please raise your  
5 hand to be recognized.

6

7

8 (No comments)

9

10 CHAIRMAN CHRISTIANSON: Seeing or  
11 hearing none we'll go to Council recommendation on this  
12 proposal.

13

14 MR. HERNANDEZ: Thank you, Mr. Chair.  
15 Don Hernandez for the Southeast RAC. Wildlife Proposal  
16 26-10. The Council voted to support with a  
17 modification. The proposal to establish a 45 day  
18 guaranteed season for trapping wolves in Unit 2, the  
19 modification was that the Council voted to retain the  
20 codified season dates in regulation, which means that  
21 March 31st date, we wanted to maintain that in  
22 regulation. We didn't want to change it to December  
23 15th. However, we wanted to have stipulate that the  
24 season must be at least 40 days long, stating that the  
25 season cannot close any earlier than December 24th. So  
26 kind of a wording issue there to maintain that March  
27 31st as the official season date but recognizing that  
28 through all this special action it's been closing  
29 earlier so we want to put into regulation that it  
30 cannot close earlier than December 24th.

31

32 Okay.

33

34 So our justification for that is  
35 Southeast Council believes that the Unit 2 wolf  
36 population is healthy, and that a 40 day trapping  
37 season would not create a conservation concern or  
38 result in overharvest. The recommendation was based on  
39 local knowledge of wolf populations and trapping  
40 practices from Council members as well as from tribal  
41 testimony during the meeting. The Council believes  
42 that subsistence needs for wolves are not being met in  
43 Unit 2 and the guaranteed 40 day season will benefit  
44 subsistence users by providing more opportunity helping  
45 them meet their needs.

46

47 Also, I want to add, I hope the Board  
48 has received a letter that was written at our last  
49 meeting. I k now it's been in the works and I hope

50

1 you've received it by now. But the letter was sent  
2 through the Board to the -- directed to the Regional  
3 Forester, to direct his in-season manager to not  
4 automatically close the hunting season when they close  
5 the trapping season, as has been done, for the last  
6 number of years, so it could possibly offer some  
7 additional opportunity for subsistence harvest through  
8 hunting and as we've heard from the Staff that, you  
9 know, hunting -- take by hunting in a very small  
10 number, but it would offer maybe some opportunity for  
11 subsistence people who are out there doing other  
12 activities, which would be mid-winter, you know,  
13 there's not a lot of activity out there but there are  
14 some people out trapping marten and mink and otter and  
15 they might encounter a wolf. There's very little deer  
16 hunting happening in that late winter, most of the  
17 wolves that are taken during the hunting season  
18 probably are in conjunction with people out deer  
19 hunting who would encounter a wolf. So we'd really  
20 like the District Ranger to seriously consider that  
21 letter and we wanted to bring that to the attention of  
22 the Board.

23

24 So, yeah, that concludes the Council's  
25 comments.

26

27 Maybe just to anticipate a question  
28 that might have arisen or might arise here after all  
29 the tribal testimony. You know, what the Council heard  
30 in regards to subsistence users not meeting their  
31 needs, it's kind of a new situation that we hadn't  
32 really heard about prior to this past year, but  
33 basically now that these seasons have gotten so short,  
34 you know, 30 day season, it's kind of turned wolf  
35 trapping into kind of like a trapping derby. You know  
36 there's a lot of really successful trappers out there  
37 and, you know, the way trapping works they're doing it  
38 to make money as well. You know wolf pelts are still  
39 worth a fair amount of money. And, you know, it just  
40 kind of diminishes the opportunity for people who want  
41 to harvest a wolf to do their traditional handicrafts  
42 and, you know, regalia, so that's kind of been the  
43 situation here recently with these compressed seasons.  
44 So we do want to try and offer some more opportunity  
45 for somebody other than a hardcore professional trapper  
46 to harvest a wolf. So that's what we're looking for.

47

48 Thank you.

49

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0763

1 CHAIRMAN CHRISTIANSON: Jerry.

2

3

4 MR. INGERSOLL: Question. Just so I  
5 understand when you say a guaranteed season, that would  
6 -- removes the authority of the Federal in-season  
7 manager to close the season early no matter how many  
8 wolves were harvested and no matter what the  
9 conservation concern might be, correct?

9

10 MR. HERNANDEZ: That would be correct,  
11 yes.

12

13

14 MR. INGERSOLL: Thank you. Question.  
15 With the permission of the Chair, question for Staff,  
16 could the in-season manager, if they were presented  
17 with substantial evidence that a conservation concern  
18 hadn't been reached yet, under current rules, have a  
19 longer season than 30-something days.

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MR. CROSS: For the record, again,  
Robert Cross with the U.S. Forest Service. Through the  
Chair. Member Ingersoll. Yes, that's correct. So  
the in-season manager, which would be the Ranger of  
Prince of Wales Island has been delegated authority by  
the Federal Subsistence Board to close, reopen or  
adjust Federal hunting and trapping seasons on Prince  
of Wales Island, so, yes, they could leave it open  
longer.

MR. INGERSOLL: Thank you.

CHAIRMAN CHRISTIANSON: Thank you, Don.  
State of Alaska.

MR. MULLIGAN: Thank you, Mr. Chair.  
For the record the Alaska Department of Fish and Game  
opposes the proposal as it would misalign State and  
Federal regulations. This proposal came up at our  
Southeast meeting in Wrangell, while the Department was  
neutral on that, the Board of Game chose to take no  
action on this very similar proposal.

Thank you.

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

MS. LAVINE: Thank you, Mr. Chair.  
ANILCA .802 states -- oh, I'm sorry, go ahead.

0764

1                   CHAIRMAN CHRISTIANSON:       Go ahead,  
2 sorry.

3  
4                   MR. HERNANDEZ:    Thank you, Mr. Chair.  
5 Through the Chair. I was wondering if I could ask the  
6 State some questions on their management. And I'd like  
7 to preface that by saying that at our Council meeting,  
8 you know, we had been informed about the new management  
9 strategy that was adopted by the State and our Council  
10 obviously had questions to ask about that and the State  
11 was not able to send anybody to our meeting from  
12 wildlife to answer questions so I mean there are --  
13 there is maybe an important question the Council might  
14 like to have, you know, on the record if that's  
15 appropriate.

16  
17                   CHAIRMAN CHRISTIANSON:   Yes.

18  
19                   MR. HERNANDEZ:    Okay. First of all, I  
20 guess I should disclose that for the past three years I  
21 have been a temporary part-time employee of the  
22 Department of Fish and Game. I've been running one of  
23 your hair board studies collecting wolf hair DNA on the  
24 north end of Prince of Wales for the past three years  
25 so I've been involved in that.

26  
27                   So I guess the Council would really  
28 like to hear a firm rationale to why the State, you  
29 know, felt it was necessary to change their management  
30 strategy, a strategy that was, you know, brought before  
31 the Council to be considered and the Council bought  
32 into that original management strategy. We were fully  
33 engaged in that. And then just as some background,  
34 I'll point out that under the old management strategy  
35 that we had been operating under, you know, the 150 to  
36 200 wolves, all of the harvest during that period fell  
37 within the upper range of that -- I guess I -- yeah,  
38 the upper range of that management strategy, it was  
39 over 200 -- the population stayed over 200 wolves, well  
40 over 200 wolves, by that strategy, you know, there  
41 should have been at least a two month season at least  
42 and it was always kind of limited to 30 days. So then  
43 it kind of appears to the Council whereas the old  
44 management strategy kind of dictated the length of the  
45 season depending on the population estimate, this new  
46 management strategy seems to dictate the management  
47 strategy based on the season length more or less. So I  
48 don't know, we'd kind of like an explanation to what  
49 your rationale was for changing that management  
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1 strategy.

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4 MR. MULLIGAN: Through the Chair. I'm  
5 just going to be candid with you, I'd love to be able  
6 to give it to you but at this point in time I do not  
7 have the details. I was not involved at that meeting,  
8 I was not at the Board of Game meeting in Wrangell.  
9 The appropriate venue would have been at the RAC  
10 meeting but as we informed you guys, when you set your  
11 date, Staff could not attend. I mean I would encourage  
12 to work with our area Staff who are the experts on that  
13 and the regional Staff who could answer that question.  
14 I know that's not the answer you wanted to get but by  
15 putting us on the spot here didn't help either. Like I  
16 said, the appropriate venue is to get those experts in  
17 the room who helped craft that. At this time I just  
18 can't give you that answer.

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MR. HERNANDEZ: Appreciate that. I  
also should let the Board know that our Council Chair  
was scheduled to attend that Board of Game meeting and  
could have interacted with some of the Staff there but  
we were told there was no funding to send RAC members  
to, you know, State Board of Game meetings so nobody  
was there in person, I called into the meeting, you  
know, you get an opportunity to give your testimony and  
if they don't ask you any questions you're kind of done  
so didn't really have that opportunity to engage with  
the biologists who were there at the meeting  
unfortunately. You know, one of whom was my, you know,  
boss, at the time, I was working for him and, you know,  
we've had a lot of discussions about wolf management,  
you know, you've got really good people working for  
you, you know, they do some really good work. I'm  
really pleased to be a part of that whole study but,  
you know, we don't always get the chance to engage as  
much as we'd like so it's unfortunate.

MR. MULLIGAN: Through the Chair. I  
think the Department and specifically for the Southeast  
RAC we have a long history of getting our folks, not  
only just online but they travel to your meetings  
whenever possible and I know that -- so the default is  
to try to get there, to be there for you guys, in this  
case we just had a conflict and it didn't work out with  
it. I appreciate the sentiment. I -- given the nature  
of my position, I am a generalist of all things and a  
master of none and I do want -- honestly not to think I  
was flippant about that, I would really -- I mean would

0766

1 want to be able to give you the details that you need,  
2 I just personally can't do that myself at this meeting  
3 so I apologize.

4  
5 MR. HERNANDEZ: Okay, thank you very  
6 much.

7  
8 CHAIRMAN CHRISTIANSON: Thank you. Any  
9 other questions for our RAC Chair.

10  
11 (No comments)

12  
13 CHAIRMAN CHRISTIANSON: ISC.

14  
15 MS. LAVINE: Thank you, Mr. Chair.  
16 ANILCA .802 states that it is the policy of Congress to  
17 manage fish and wildlife populations consistent with  
18 sound management principles and the conservation of  
19 healthy populations. ANILCA .815 states that nothing  
20 in this title shall be construed as permitting the  
21 level of subsistence users of fish and wildlife within  
22 a conservation unit to be inconsistent with the  
23 conservation of healthy populations. A guaranteed  
24 season length with no harvest limit regardless of  
25 harvest or population size would violate recognized  
26 principles of sound wildlife management and is  
27 therefore counter to ANILCA's conservation mandate.

28  
29 In addition, in-season management  
30 flexibility would be limited if a guaranteed season  
31 length with no harvest limit were adopted into  
32 regulation, thus, the Board would also have to delegate  
33 authority to the in-season manager to set a harvest  
34 quota because there is no harvest limit for wolves in  
35 Unit 2. Due to the limited in-season management  
36 authority proposed by this regulation, the in-season  
37 manager would have to elevate action back to the Board  
38 each season if a conservation concern were to arise.

39  
40 In summary, implementing a minimum  
41 season length for Prince of Wales wolves in regulation  
42 would take management flexibility away from in-season  
43 managers, could potentially create conservation  
44 concerns and may result in a fourth Endangered Species  
45 Act listing petition with the U.S. Fish and Wildlife  
46 Service. It would also result in additional work by  
47 the State and Federal in-season managers and  
48 unnecessarily jeopardize the management partnership  
49 between ADF&G and the U.S. Forest Service as well as  
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0767

1 creating confusion among users.

2

3

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.

7

8

9

(No comments)

10

11

12

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

13

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16

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.

17

18

19

MR. STRIKER: Park Service seconds.

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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 suggests that the wolf population is higher than what they would like and specifically that they need more wolf pelts for ceremonial and other traditional subsistence uses. And that speaks to me.

31

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34

And we oppose this motion because it is fundamentally inconsistent with Federal law and ANILCA and with sound principles of conservation management.

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45

ANILCA Section .802 says the Program must be implemented consistent with sound management principles and the conservation of healthy populations. ANILCA Section .805 give deference to the RACs unless their recommendation violates recognized principles of fish and wildlife conservation. ANILCA Section .815 states that nothing in this title shall be construed as permitting the level of subsistence uses of fish and wildlife to be inconsistent with the conservation of healthy populations.

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50

The Endangered Species Act ultimately charges us with preventing populations from becoming listed as threatened or endangered, of conserving the

0768

1 population so that they do not become endangered and  
2 we've had three petitions for listing of the Alexander  
3 Archipelago wolf. The reason those petitions have not  
4 been successful and the wolf is not now listed is  
5 because of the demonstrated robust conservation  
6 management that has been implemented between the State  
7 and the Forest Service and we expect another petition  
8 and another petition after that. And the way that we  
9 protect our continued ability to harvest wolves and use  
10 wolves and prevent their listing is by demonstrating  
11 through the Endangered Species Act and in consultation  
12 with the Fish and Wildlife Service that we are taking  
13 active measures to prevent that population from  
14 becoming endangered.

15

16 The Board of Game has rejected some  
17 more proposals. And it's worth pointing out that most  
18 wolf harvest on Prince of Wales Island in Unit 2 is  
19 actually not on the Federal lands and so in order to  
20 manage this population successfully we must do it  
21 together.

22

23 Finally, this proposal would remove the  
24 authority of the in-season manager to manage the  
25 population based on emergencies. It would set in our  
26 rules an unlimited harvest, without an ability to close  
27 it in-season and that's a fundamental violation of  
28 wildlife conservation principles. That's why we must  
29 oppose this motion.

30

31 CHAIRMAN CHRISTIANSON: Any Board  
32 discussion, deliberation.

33

34 (No comments)

35

36 CHAIRMAN CHRISTIANSON: Read in the  
37 motion and roll call please.

38

39 MS. LEONETTI: The motion is to adopt  
40 Wildlife Proposal 26-10.

41

42 Forest Service Member Ingersoll.

43

44 MR. INGERSOLL: Oppose.

45

46 MS. LEONETTI: Park Service Member  
47 Striker.

48

49 MR. STRIKER: Park Service is nay on

50

0769

1 the motion. Park Service opposes WP26-10 with apologies  
2 to the RAC for the reasons I think very, very well  
3 articulated by the Forest Service. We just can't.

4

5 MS. LEONETTI: Public Member Pitka.

6

7 MS. PITKA: I vote to oppose WP26-10,  
8 it violates recognized principles of fish and wildlife  
9 conservation and would cause a species to get listed on  
10 the ESA. Thank you.

11

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

14

15 MS. BOARIO: Fish and Wildlife Service  
16 opposes for the reasons the Forest Service stated and I  
17 apologize that I don't have our species status  
18 assessment for the Alexander Archipelago Wolf with me  
19 or memorized. But I feel like I remember that -- first  
20 of all, I know the geography for the Alexander  
21 Archipelago wolf is far larger than just Prince of  
22 Wales in determining the listing status and I don't  
23 believe that we determined that they were a distinct  
24 population segment so I just -- while I oppose I'd be  
25 really cautious about how we're portraying a potential  
26 listing and the impact on Prince of Wales Island. I  
27 apologize that I can't doublecheck that but I really  
28 think that might be speculating a bit too far. But I  
29 do oppose and wish I had the exact information to be  
30 really clear about that.

31

32 Thank you.

33

34 MS. LEONETTI: BIA Member John.

35

36 MS. JOHN: BIA votes to adopt WP26-10  
37 with the Southeast Regional Advisory Council  
38 modification.

39

40 We concur with the Council's  
41 justification and use of the local hunters and trappers  
42 expertise regarding wolf abundance in developing their  
43 recommendation. Testimony from Unit 2 tribes and the  
44 other users about their inability to meet wolf pelt  
45 needs for traditional handicrafts also supports this.  
46 We appreciate the Councils extensive efforts to develop  
47 this proposal for the benefit of Federal subsistence  
48 users on Prince of Wales Island.

49

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0770

1 MS. LEONETTI: Public Member Oney.

2

3 MR. ONEY: Public Member Ray Oney moves  
4 to adopt 26-10.

5

6 MS. LEONETTI: Public Member Woods.

7

8 MR. WOODS: Boy Public Member Woods  
9 moves to oppose 26-10. I would have loved to have some  
10 sort of recommendation from tribal to make the  
11 modification that the RAC came up with. Those things  
12 would have been -- not only helped, I think, the  
13 process, but also recognized that we don't want to go  
14 into a species of concern or the Endangered Species Act  
15 or conservation concerns starts triggering, reeling  
16 back our subsistence opportunities. Those things are  
17 real, what the Forestry pointed out are glaring facts  
18 for me and I commend the RAC for sitting down with  
19 ADF&G and working out, at least, some of the issues,  
20 here at this table, that means a lot and that's a  
21 beginning of a longstanding solution because right now  
22 the problems I see are temporary. Because if you don't  
23 have a handle on the harvest -- number 1, 45 wolves got  
24 caught this year and if we're not sitting at the table  
25 negotiating with the State and the Feds, like I pointed  
26 out as tribal entities and we're always arguing and  
27 fighting amongst each other, the opposition will have  
28 their way and the opposition is to go until it's all  
29 gone. I say that with grace because number 1 I sit on  
30 the table, where I sit in an area where all the caribou  
31 is gone, we have no options but to go to the Federal  
32 government and beg for a caribou. We heard testimony  
33 time and time again that this process does not feed us,  
34 that this process does not work and we complain and we  
35 sit at the table but we don't talk to one another. The  
36 hardest thing as a subsistence user is to admit that I  
37 might be wrong, that I might not have the answers. I  
38 sat with a biologist, the concern -- well, we have the  
39 opposite problem as the Southeast, we have too many  
40 wolves, and unlike Southeast those wolves have eaten  
41 everything. You look for a State hunt on Federal land,  
42 the Mulchatna went from 200,000 to 13,000 and now we go  
43 to the State and ask them and beg them for a caribou,  
44 I'm saying this because I think this is going to be an  
45 ongoing issue for the rest of the history of the state  
46 of Alaska.

47

48 And I want our young people to be fully  
49 engaged and I respect everybody's position here whether  
50

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1 it's right or wrong, whether I disagree or disagree  
2 [sic] and that's the main point here is that we all  
3 come with the best information that we have and what I  
4 read is I didn't agree with. I would love to have the  
5 recommendation like BIA pointed out, that I would agree  
6 to that, but as I'm looking at the screen, I'm voting  
7 on WP26-10 with no modification so I have to vote it  
8 down, Mr. Chair. Thank you.

9

10 MS. LEONETTI: Public Member Payenna.

11

12 MR. PAYENNA: I respect all the public  
13 testimony that was given but I'm afraid I will have to  
14 agree with the Forest Service and oppose the motion.

15

16 MS. LEONETTI: BLM Member Vickers.

17

18 MR. VICKERS: Oppose 26 -- WP26-10.  
19 BLM recognizes concerns of the different stakeholders  
20 here. Southeast Alaska Council members, tribal  
21 members here and other Federally-qualified subsistence  
22 users have shared TEK and that there should be more  
23 opportunity to harvest wolves under Federal  
24 regulations.

25

26 I greatly appreciate hearing more about  
27 the cultural significance of wolves to the tribes of  
28 Southeast and am disheartened to hear that their  
29 subsistence needs are not being met.

30

31 There are many reasons that the  
32 subspecies of wolf must be managed with caution. The  
33 harvest rates are relatively high and a guaranteed  
34 season length could potential lead to overharvest,  
35 especially if there are successive years with high  
36 harvest numbers. BLM appreciates U.S. Forest Service  
37 working closely with Alaska Department of Fish and Game  
38 and other stakeholders to culminate adaptive management  
39 actions. Unfortunately the data does not support  
40 setting a minimum season or a guaranteed season length.  
41 U.S. Forest Service in-season manager should maintain  
42 delegated to set season length with input from local  
43 subsistence users to ensure that they are meeting their  
44 subsistence needs.

45

46 Thank you.

47

48 MS. LEONETTI: Chair Christianson.

49

50

1                   CHAIRMAN CHRISTIANSON: I support in  
2 deference to the RAC. I think I probably got some of  
3 the longer history working on this project being the  
4 original hair board study guy with the HCA and sitting  
5 at the State and Federal as we tried to figure out this  
6 plan, talk about a mistrust between agencies to start  
7 with and put yourself in the middle as an Indian, we're  
8 still doing the same thing, we're still plucking  
9 feathers from a turkey and trying to feed it to  
10 ourselves. It's a tough one.

11  
12                   I live there. We have seen it put in  
13 the area biologists hands when we operated out of fear  
14 and we eroded trust especially with this specific  
15 species with the rural user really bad. It's still a  
16 really highly contentious issue as you could hear today  
17 but when you're operating in a vacuum where special  
18 interest groups are driving the agenda here and we keep  
19 repeating it. I don't like operating in fear and we  
20 got to put ourselves -- or don't change the game or  
21 push the bus down the road for your people, you sit  
22 back and wait for the wreck to happen, you grab the  
23 wheel, you drive it and you go forward.

24  
25                   Like I say, I got a lot of history with  
26 this, close to home for that I support.

27  
28                   MS. LEONETTI: Okay, Mr. Chair, the  
29 motion fails three in support, seven opposed.

30  
31                   CHAIRMAN CHRISTIANSON: Let's take a  
32 five minute break, thank you. And good job, thank you  
33 guys for getting through the wildlife, we've got next  
34 on the agenda consensus agenda to be adopted.

35  
36                   (Off record)

37  
38                   (On record)

39  
40                   CHAIRMAN CHRISTIANSON: Next up is the  
41 consensus agenda and adoption.

42  
43                   MS. GREDIAGIN: All right, thank you,  
44 Mr. Chair. This is Lisa Grediagin, the Wildlife  
45 Division Supervisor at OSM. I will be super speed  
46 reading all the consensus agenda proposals and closure  
47 reviews along with the recommendations into the record.  
48 These are the proposals and closure reviews for which  
49 there is agreement among the Federal Subsistence  
50

0773

1 Regional Advisory Councils, the Federal InterAgency  
2 Staff Committee and the Alaska Department of Fish and  
3 Game concerning Board action. The following are the  
4 consensus agenda proposals and closure reviews.

5  
6 Wildlife Proposal 26-02 requests to  
7 prohibit the take of large land mammals in Units 1  
8 through 5 from civil sunset until civil sunrise. The  
9 recommendation is to oppose.

10  
11 WP26-09 requests to move the starting  
12 date for the wolf trapping in Unit 2 from November 15th  
13 to December 15th. The recommendation is to oppose.

14  
15 WP26-11 requests the closure of Federal  
16 public lands on Hawkins Island and Hinchinbrook Island  
17 in Unit 6C to hunting for black bears by non-Federally-  
18 qualified users and to require a Federal registration  
19 permit. The recommendation is to oppose.

20  
21 WP26-18/19/20 and 23 requests  
22 prohibiting trap or snare usage in designated areas on  
23 the Kenai Peninsula in Unit 7 unless they meet certain  
24 criteria. All proposals request to limit trapping  
25 within a certain distance around and along campgrounds,  
26 beaches, roads and trails within 100 or 50 yards,  
27 depending on location. WP26-21 requests to make active  
28 trapping sites mandatory at all access points to  
29 operating traplines. The recommendation is to support  
30 WP26-19 as modified by OSM and to take no action on the  
31 remaining proposals.

32  
33 WP26-25/26 requests to increase the  
34 harvest for brown bears in Unit 13 to two bears. The  
35 recommendation is to support.

36  
37 WP26-35 requests to extend the fall  
38 season for caribou in Unit 9D to October 21st. The  
39 recommendation is to support.

40  
41 WP26-36 requests to shorten the  
42 wolverine hunting season in Unit 9 to match the State  
43 season of September 1st to the last day of February.  
44 The recommendation is to support.

45  
46 WP26-37 requests to remove the firearm  
47 restrictions for beaver trapping in Units 9 and 17.  
48 The recommendation is to support as modified by OSM.

49  
50

1                   WP26-38 requests to increase the  
2 harvest limit from brown bears in Unit 17 from one to  
3 two bears and eliminate the State registration  
4 requirement. Proposal WP26-39 requests to extend the  
5 brown bear season in Unit 7 to yearround. The  
6 recommendation for both proposals is to support.

7  
8                   WP26-40 requests to close Federal  
9 public lands in portions of Unit 17A and 17C to caribou  
10 hunting by non-Federally-qualified users and Federally-  
11 qualified subsistence users except those Federally-  
12 qualified subsistence users residing in Togiak, Twin  
13 Hills, Manokotak, Aleknagik, Dillingham, Clark's Point  
14 and Ekuk regardless of the population size of the  
15 Nushagak Peninsula Caribou Herd. The recommendation is  
16 to oppose.

17  
18                   Wildlife Closure Review 26-07 reviews  
19 the Federal public lands closure in portions of Unit  
20 17A and 17C to the taking of caribou except by  
21 Federally-qualified subsistence users unless the  
22 Nushagak Peninsula Caribou Herd population estimate  
23 exceeds 900 caribou. The recommendation is to retain  
24 status quo.

25  
26                   WP26-46 requests to increase the  
27 harvest limit for ptarmigan in Unit 18 from 15  
28 ptarmigan per day, 30 in possession to 25 ptarmigan, 50  
29 in possession. The recommendation is to support.

30  
31                   WP26-52 requests to align the harvest  
32 limit and season length for brown bear in Unit 22 with  
33 State regulations. The recommendation is to support.

34  
35                   WP26-55 and 56 requests to extend the  
36 fall season dates and establish a winter season for  
37 moose in a portion of Unit 22A. WP26-55 also requests  
38 requiring a State registration permit. The  
39 recommendation is to support WP26-55 and to take no  
40 action on WP26-56.

41  
42                   WP26-57 requests to establish a Federal  
43 registration moose permits in Unit 22A, that portion  
44 north of the Egavik Creek drainage and Unit 22A  
45 Remainder. The recommendation is to oppose.

46  
47                   WP26-58 requests to eliminate the  
48 Federal moose permit FM2202 and to change the harvest  
49 limit from one bull to one antlered bull for the winter  
50

0775

1 moose hunt in Unit 22B west of the Darby Mountains.  
2 The recommendation is to support.

3

4 WP26-59 requests to shift the fall  
5 moose season in Unit 22B west of the Darby Mountains  
6 from September 1st to the 14th to September 6th to  
7 20th. The recommendation is to oppose.

8

9 WP26-60 request to align State and  
10 Federal regulations for moose in Unit 22D. The  
11 recommendation is to support.

12

13 WP26-62a requests that the Board  
14 recognize the customary and traditional use of muskoxen  
15 in Unit 22A by residents of St. Michael, Shaktoolik,  
16 Stebbins, and Unalakleet. The recommendation is to  
17 support as modified by OSM.

18

19 WCR26-09a reviews the closure to moose  
20 hunting by non-Federally-qualified users from September  
21 21st to October 31st in the northern portion of Unit  
22 22A. WCR26-09c reviews the closure to moose hunting by  
23 non-Federally-qualified users from October 1st to  
24 October 31st in Unit 22A Remainder. The recommendation  
25 is to rescind both of these closures.

26

27 Wildlife Closure Review WCR26-16  
28 reviews a closure to the harvest of moose by non-  
29 Federally-qualified users in Unit 22E. The  
30 recommendation is to retain status quo.

31

32 WP26-67 requests to extend the trapping  
33 season for muskrat to yearround in Unit 23 to match  
34 State regulations. The recommendation is to support.

35

36 WP26-68 requests to increase the  
37 harvest limit and extend the season for ptarmigan in  
38 Unit 23 to match State regulations. The recommendation  
39 is to support.

40

41 WP26-68 requests to increase the  
42 harvest limit and extend the season for ptarmigan in  
43 Unit 23 to match State regulations. The recommendation  
44 is to support.

45

46 WP26-70 requests allowing the sale of  
47 handicrafts and incorporate any non-edible parts of  
48 black bear except gall bladders from black bears  
49 harvested Units 20E, 25A and 25B. The recommendation  
50

0776

1 is to support.

2

3 WP26-71 requests increasing the harvest  
4 limit for brown bear in Unit 12 to two bears. The  
5 recommendation is to support.

6

7 WP26-72b requests increasing the  
8 harvest limit for brown bear in Unit 22E to two bears.  
9 The recommendation is to support.

10

11 WP26-73 requests an increase in the  
12 harvest limit for brown bears in Unit 25B to two bears.  
13 The recommendation is to oppose.

14

15 WP26-74 requests that the Board  
16 recognize the customary and traditional uses of sheep  
17 in Unit 12 by residents of Chitina and Kenny Lake. The  
18 recommendation is to oppose.

19

20 WP26-78 requests changing the boundary  
21 between Units 25C and 25D to align with Federal  
22 regulations. The recommendation is to support.

23

24 WCR26-22 reviews the closure to moose  
25 hunting in Unit 25D West except by residents of 25D  
26 West and Birch Creek. The recommendation is to retain  
27 the status quo.

28

29 WCR26-25 reviews the closure in Unit  
30 26C to the harvest of muskox except by residents of  
31 Kaktovik. The recommendation is to retain the status  
32 quo and clarify regulatory language as recommended by  
33 OSM.

34

35 (Laughter and applause)

36

37 MS. GREDIAGIN: So thank you, Mr.  
38 Chair, that concludes the consensus agenda and I would  
39 also like to take this opportunity to give a big thank  
40 you to all of the OSM analysts for their great work on  
41 analyzing and presenting all the proposals and closure  
42 reviews.

43

44 (Applause)

45

46 MS. GREDIAGIN: I'd also like to take  
47 this opportunity to give a big thank you for Robbin for  
48 her super woman coordination of this entire meeting as  
49 well as the entire OSM Team for all their assistance

50

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1 and support in putting on this meeting.

2

3 Thank you, Mr. Chair.

4

5 (Applause)

6

7 CHAIRMAN CHRISTIANSON: Thank you for  
8 being a machine gun today.

9

10 (Laughter)

11

12 CHAIRMAN CHRISTIANSON: We're firing on  
13 all cylinders at 8:30. The consensus agenda as  
14 presented by Staff.

15

16 MS. JOHN: Mr. Chairman.

17

18 CHAIRMAN CHRISTIANSON: Yes, you have  
19 the floor.

20

21 MS. JOHN: The Bureau of Indian Affairs  
22 really appreciates everything that the Staff, the  
23 committees, the Fish and Game for thank goodness having  
24 a consensus agenda, otherwise we would have been here  
25 for a few more days. That was a lot of hours of work  
26 that everyone put into that and in careful evaluation.

27

28 So BIA moves to accept the actions for  
29 the 2026/2028 Federal Subsistence Wildlife Regulatory  
30 Proposals and closure reviews as listed on the  
31 consensus agenda and as described in the associated  
32 documents.

33

34 MR. INGERSOLL: Forest Service seconds.

35

36 CHAIRMAN CHRISTIANSON: Motion been  
37 made and seconded to accept the consensus agenda as  
38 presented and read into the record. Hearing or seeing  
39 no more further deliberation, is there any opposition  
40 to the consensus agenda as presented.

41

42 (No opposing votes)

43

44 CHAIRMAN CHRISTIANSON: Hearing none,  
45 motion carries unanimously to accept the consensus  
46 agenda as presented. Thank you.

47

48 Oh, they said to do the shark one.

49

50

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1 (Makes sound)

2

3 CHAIRMAN CHRISTIANSON: Oh, that's how  
4 it goes, no, I'm off sorry.

5

6 (Laughter)

7

8 CHAIRMAN CHRISTIANSON: RFR25-01.....

9

10 MS. LEONETTI: And 02.

11

12 CHAIRMAN CHRISTIANSON: .....and 02.

13

14 MR. ROBERTS: Good evening, Mr. Chair.  
15 Members of the Board. I'm Jason Roberts an  
16 Anthropologist at OSM. RFR25-01 and -02 requests that  
17 the Board reconsider its decision to adopt NDP25-01.  
18 This decision changed the status of the Ketchikan area  
19 from non-rural to rural within the Federal Subsistence  
20 Management Program. The Board's decision on this  
21 proposal went into effect when it was published in the  
22 Federal Register on July 18th, 2025. Due to the  
23 inclusive nature of customary and traditional use  
24 determinations in the Southeast region, Ketchikan  
25 residents immediately became Federally-qualified  
26 subsistence users for most resources in Units 1 through  
27 5 following this change in rural status.

28

29 Moving on to a bit about the process  
30 here.

31

32 So request for reconsideration first go  
33 through this administrative process in which the Board  
34 determines if the request for reconsideration meets the  
35 regulatory threshold for the Board to reconsider its  
36 decision and that's what the Board is deciding right  
37 now. There is no public process at this stage. If the  
38 Board determines that all or part of a request for  
39 reconsideration meets the criteria set forth in  
40 regulation then OSM will initiate a public process on  
41 the request and provide further information on the  
42 steps and the process and issues to be discussed based  
43 on direction from the Board. This process should occur  
44 over the next regulatory cycle during which time the  
45 Southeast Council, tribal and ANCSA organizations, the  
46 State and the public will have opportunities to provide  
47 input on the request for reconsideration and the Board  
48 would consider all of this input and make a final  
49 decision most likely at its 2027 regulatory meeting.

50

1                   So by regulation, the Board will accept  
2 a request for reconsideration only if it means at least  
3 one of the following criteria on that slide there. The  
4 request is based upon information not previously  
5 considered by the Board. The request demonstrates that  
6 the existing information used by the Board in its  
7 decision is incorrect, and/or the request demonstrates  
8 that the Board's interpretation of information,  
9 applicable law or regulation was in error or contrary  
10 to existing law. And it's the proponent's  
11 responsibility to provide sufficient evidence to  
12 demonstrate that the request meets at least one of  
13 these criteria.

14  
15                   So moving on to the next slide.

16  
17                   So OSM received two requests for  
18 reconsideration. One from the Craig Tribal Association  
19 and one from Shaan Seet Incorporated. Both requests  
20 for reconsideration were identical, there were no  
21 differences in the claims or supporting information  
22 provided. The RFRs make seven distinct claims. Each  
23 claim appears to target threshold criterion three  
24 stating that the Board's interpretation of information,  
25 applicable law, or regulation was in error or contrary  
26 to existing law. One of the claims also appears to  
27 target threshold criterion one that the claim is based  
28 on information not previously considered by the Board.

29  
30                   The proponents request for  
31 reconsideration and supporting information can be found  
32 in your supplementary materials book as well as on our  
33 website under the supplementary materials heading. The  
34 Board has been provided with these materials as well as  
35 background information on the Ketchikan rural  
36 determination made in 2025.

37  
38                   OSM did not provide a specific  
39 recommendation to the Board on whether the request for  
40 reconsideration meet the threshold criteria. This  
41 concludes the Staff presentation.

42  
43                   Thank you.

44  
45                   CHAIRMAN CHRISTIANSON: Thank you for  
46 that and I believe -- so, yeah, now we're open for  
47 Board motion, discussion and action. And yesterday we  
48 did have an executive session to look at this and I  
49 think Robbin has the floor for a second.  
50

0780

1 MS. LAVINE: Thank you, Mr. Chair.  
2 Last night there was an executive session of the full  
3 Board that has been present for this entire meeting,  
4 some members of the ISC, the OSM or Federal Subsistence  
5 Management Program solicitor and some OSM Staff. This  
6 was an opportunity for the solicitor to provide  
7 guidance and an overview of requests for  
8 reconsideration in regulation and it was a good  
9 discussion. We stayed longer than I think we would  
10 have wished and that's it. Thank you, Mr. Chair.

11

12 CHAIRMAN CHRISTIANSON: Thank you.  
13 Appreciate that Robbin. With that we have this ahead  
14 of us, looking for a Board to make a motion to this  
15 request.

16

17 MR. INGERSOLL: Mr. Chair.

18

19 CHAIRMAN CHRISTIANSON: You have the  
20 floor.

21

22 MR. INGERSOLL: Forest Service moves to  
23 accept the request for reconsideration and refer them  
24 to Staff for further consideration. If I get a second  
25 I'll explain why I intend to support my motion.

26

27 MR. VICKERS: BLM seconds.

28

29 MR. INGERSOLL: I support my motion  
30 based on the questions around the information not  
31 previously considered by the Board and specifically  
32 whether formal statements by Federally-recognized  
33 tribal governments containing traditional ecological  
34 knowledge were fully provided to the Board and  
35 considered by the Board in their previous decision.

36

37 Thank you.

38

39 CHAIRMAN CHRISTIANSON: I see concern  
40 down here, we got a motion and second -- you're making  
41 a motion to accept?

42

43 MR. INGERSOLL: Correct.

44

45 CHAIRMAN CHRISTIANSON: Okay. Just  
46 making sure there's clarification, I seen some  
47 questions in eyes here. Okay, there's a motion on the  
48 floor here to accept the RFR, the Forest Service  
49 seconded it [sic]. Further discussion or deliberation

50

0781

1 before we go to a vote.

2

3 (No comments)

4

5 CHAIRMAN CHRISTIANSON: This is it, we  
6 have a motion on the floor. Like I said a lot of us --  
7 all right, roll call, please.

8

9 MS. LEONETTI: Okay, the motion is to  
10 accept Request for Reconsideration 25-01-02 and refer  
11 it to Staff for analysis.

12

13 Forest Service Member Ingersoll.

14

15 MR. INGERSOLL: Support.

16

17 MS. LEONETTI: BLM Member Vickers.

18

19 MR. VICKERS: BLM opposes. When we  
20 considered NDP25-01 in February 2025 the Board did not  
21 receive the tribes letters and resolutions containing  
22 information TEK on Prince of Wales deer population and  
23 harvest trends, yet the content for the letters and  
24 resolutions was considered by the Board in acting on  
25 NDP25-01. Southeast Alaska Council recommendation  
26 noted that potential impacts on Unit 2 resources was a  
27 factor in its opposition to the proposal, the  
28 InterAgency Staff Committee stated that the deer  
29 potential for overharvest shouldn't be considered a  
30 factor in determining rural characteristics of a  
31 community. Several Board members mentioned potential  
32 overharvest of deer in their justifications and asked  
33 questions of Staff during discussions.

34

35 Therefore, while the tribes resolutions  
36 should have been given to the Board, the claim does not  
37 meet the threshold of criterion one because information  
38 in the TEK resolutions was information previously  
39 considered by the Board.

40

41 MS. LEONETTI: Park Service Member  
42 Striker.

43

44 MR. STRIKER: Park Service is opposed  
45 for the reasons so well articulated by my colleague  
46 from the BLM.

47

48 MS. LEONETTI: Fish and Wildlife  
49 Service Member Boario.

50

1 MS. BOARIO: Fish and Wildlife Service  
2 is opposed similar to my colleague with BLM,  
3 specifically regarding criterion one. Tribal  
4 resolutions and letters are important and I am glad to  
5 have received them and have read through them for this  
6 request for reconsideration. I find that the  
7 information within them was summarized for and  
8 considered by the Board during our decisionmaking  
9 process last year. Further, regarding criterion two  
10 and three, I don't believe there is a demonstrated  
11 legal error with regard to ANILCA's requirements  
12 relating to the subsistence priority and ANILCA .810.  
13 Likewise, I don't think there is a demonstrated  
14 violation of the Administrative Procedure Act. I think  
15 the Board properly considered the factors in its non-  
16 rural determination policy, a policy that was revised  
17 after an extensive multi-year public process. Revised  
18 regulations for the rural determination process were  
19 published in the Federal Register in 2015 and the Board  
20 officially adopted the new policy in 2017. This new  
21 policy removed specific guidelines for rural  
22 determinations including requirements regarding  
23 population and instead took a comprehensive approach  
24 that considers many factors which the Board did.

25  
26 Thank you.

27  
28 MS. LEONETTI: BIA Member John.

29  
30 MS. JOHN: The BIA votes to oppose the  
31 motion and to not consider further action on the  
32 request for reconsideration that were submitted to the  
33 Federal Subsistence Board by the Craig Tribal  
34 Association and Shaan Seet Incorporated pertaining to  
35 the Board's 2025 decision to designate the Ketchikan  
36 area as rural.

37  
38 We do not feel that these RFRs should  
39 be accepted for threshold analysis because they are not  
40 based upon information not previously considered by the  
41 Board, do not demonstrate that the information used by  
42 the Board is incorrect, nor do they demonstrate that  
43 the Board's interpretation of information applicable  
44 law or regulation is in error or contrary to existing  
45 law.

46  
47 We greatly appreciate the traditional  
48 and local knowledge about subsistence practices on  
49 Prince of Wales Island that has been provided to the  
50

0783

1 Southeast RAC and the Board during this rural  
2 determination process. BIA also acknowledges the  
3 tribes and the corporations ongoing concerns regarding  
4 the ability of Unit 2 residents to meet their deer  
5 subsistence needs. The Board has worked with the  
6 Southeast RAC to implement regulations and have  
7 continued to address them during this meeting.

8

9 Gunalcheesh. Haw'aa. To the Craig  
10 Tribal Association and Shaan Seet Incorporated and  
11 others for the dedicated efforts to help the Prince of  
12 Wales rural residents your important cultural  
13 traditions.

14

15 MS. LEONETTI: Public Member Pitka.

16

17 MS. PITKA: I vote to oppose the motion  
18 to accept the reconsideration. Based on a lot of the  
19 discussion already put forward, we had exhaustive  
20 discussions about the Ketchikan rural determination  
21 during our last Board meeting, we took into account a  
22 lot of traditional ecological knowledge. We spent a  
23 lot of time on this. We listened very carefully to the  
24 Southeast Regional Advisory Council and all of their  
25 exhaustive work on this. We went through the entire  
26 public process and it felt like we were there for days.  
27 I felt like we had a very detailed discussion based on  
28 those parameters.

29

30 Thank you.

31

32 MS. LEONETTI: Public Member Oney.

33

34 MR. ONEY: Public Member Ray Oney moves  
35 to oppose as articulated by BLM.

36

37 MS. LEONETTI: Public Member Woods.

38

39 MR. WOODS: Public Member Woods moves  
40 to oppose to the lengthy conversations and thresholds  
41 that were used to come to the decision. We were  
42 working under pretty long days and a lot of information  
43 but in that regard I think we did due diligence and  
44 this Board acted appropriately and for that, and along  
45 with the reasons of BLM and other members that just  
46 stated, I oppose to bringing this to reconsideration.

47

48 MS. LEONETTI: Public Member Payenna.

49

50

0784

1 MR. PAYENNA: I would have to agree  
2 with comments submitted prior to me by BLM, BIA and the  
3 Fish and Wildlife Service and oppose the motion.

4  
5 MS. LEONETTI: Chair Christianson.

6  
7 CHAIRMAN CHRISTIANSON: I support the  
8 proposal as stated by the U.S. Forest Service, as one  
9 of the original dissenters of this, you know, and  
10 supporting the rural residents of Prince of Wales  
11 Island in the initial and will continue to do that,  
12 thank you. And in deference to the RAC and the 7 to 3  
13 vote that they made in this and describing what rural  
14 and non-rural looks like in the region that they so  
15 diligently and so charismatically represent and do  
16 exactly like we do here, exhaust all avenue and work  
17 through the system until they figure it out, and so  
18 hat's off to you guys and thank you to the Forest  
19 Service for that motion.

20  
21 MS. LEONETTI: Mr. Chair, the motion  
22 fails two in favor, eight opposed.

23  
24 CHAIRMAN CHRISTIANSON: Thank you.  
25 Appreciate everybody with that. I think we have one  
26 more thing on our agenda.

27  
28 MS. LEONETTI: Council correspondence.

29  
30 CHAIRMAN CHRISTIANSON: Council  
31 correspondence, yes, or what is next.

32  
33 MS. LEONETTI: Council correspondence  
34 is going to -- Robbin.

35  
36 MS. LAVINE: The Council correspondence  
37 to the Board, this is just an update and if you all  
38 look in front of you I have passed out the -- actually  
39 I've already passed out the spreadsheets. The  
40 spreadsheets in front of you document the  
41 correspondence to the Board or through the Board to the  
42 Secretaries and to some of the Board agencies and where  
43 these correspondences are in regards to replies, right.  
44 So I do want you to note that the letters from  
45 Southeast regarding wolves is pending and should be  
46 coming before you soon. I want you guys to keep your  
47 eyes open for some of these new letters that start with  
48 the call number 2026, you will be working through your  
49 ISC member to begin to consider responses and actions  
50

0785

1 in regards to these letters. And you will be  
2 addressing this correspondence along with annual  
3 reports and your Board replies during the summer work  
4 session.

5

6 CHAIRMAN CHRISTIANSON: I don't speak  
7 Yup'ik, I speak Haida.

8

9 (In Native)

10

11 CHAIRMAN CHRISTIANSON: And it's a good  
12 day to be here. Next. WP25-02 Unuk River.

13

14 MR. CROSS: Thank you, Mr. Chair. For  
15 the record my name is Robert Cross with the Forest  
16 Service. Federal Fisheries Proposal 25-02 can be found  
17 in Volume III on Page 1467 of your meeting book and  
18 requests closing the Federal waters of the Unuk River  
19 to non-Federally-qualified users.

20

21 The proponent, the Southeast Alaska  
22 Regional Advisory Council states that a closure to non-  
23 Federally-qualified users will help the Unuk River  
24 eulachon population recover while continuing to provide  
25 harvest opportunities to Federally-qualified  
26 subsistence users. In 2005 the eulachon population in  
27 District 1 containing the Unuk River collapsed  
28 resulting in State and Federal closures to eulachon  
29 fishing between 2005 and 2020. A limited Federal  
30 subsistence fishery occurred on the Unuk River from  
31 2021 to 2025 for Federally-qualified subsistence users  
32 and will occur again in 2026. All closures since 2005  
33 for District 1 eulachon harvest have been conducted  
34 using in-season management actions. If this proposal  
35 is adopted it would set into regulation the special  
36 actions that the Federal in-season managers have been  
37 implementing on a yearly basis.

38

39 This system has an active monitoring  
40 project for eulachon escapement. From 2005 to 2009  
41 less than 100 fish were observed in the Unuk River  
42 system. From 2011 to present eulachon were observed in  
43 both the Unuk River and other nearby areas in Unit 1  
44 but numbers have been variable and remain much lower  
45 than those observed prior to 2005, or prior to the  
46 collapse. Due to the upcoming of Ketchikan's non-rural  
47 status, this proposal was deferred by the Federal  
48 Subsistence Board in the last fisheries cycle so that  
49 the Southeast Regional Advisory Council could take into  
50

0786

1 account this large change to the basis on which the  
2 proposal was submitted and deliberated. Now that  
3 Ketchikan is a rural community this closure would have  
4 very minimal affect to reducing harvest within this  
5 fishery.

6  
7 The OSM conclusion is to support  
8 Proposal FP25-02 with modification to close all Federal  
9 public waters of District 1 to the harvest of eulachon  
10 except by Federally-qualified subsistence users in the  
11 Unuk River. The general cycle for eulachon is roughly  
12 five years for their lifespan, therefore, while the  
13 recent increases in returns are encouraging we're  
14 hoping to see improved returns over a generational  
15 cycle before we increase harvest. Further, public  
16 comments highlighted that the current five gallon per  
17 household annual limit is far below subsistence harvest  
18 needs in most households, therefore, restricting non-  
19 Federally-qualified users is the first step in  
20 providing subsistence priority for this resource and  
21 continued reduced returns or increased harvest may  
22 necessitate a future .804 restriction.

23  
24 And that's the end of my presentation.

25  
26 CHAIRMAN CHRISTIANSON: Thank you, Mr.  
27 Cross. Any summary of written public comment.

28  
29 MR. CROSS: One public comment was  
30 received on this proposal during the initial public  
31 comment period in 2024 and it can be found in Tab 4 of  
32 your supplemental materials. The comment from the  
33 coordinator of the Tongass Women for the Forest was  
34 neutral on FP25-02. It expressed concerns that were  
35 outside of the scope of the Federal Subsistence  
36 Management Program.

37  
38 CHAIRMAN CHRISTIANSON: Thank you, Rob.  
39 Summary of tribal, ANCSA Corporations consultations.  
40 Orville.

41  
42 MR. LIND: Thank you, Mr. Chair. There  
43 were none. Thank you.

44  
45 CHAIRMAN CHRISTIANSON: Thank you,  
46 Orville. Tribal, Native organization testimony.

47  
48 Gloria.

49  
50

1 MS. BURNS: Yeah, I guess I just wanted  
2 to make a comment. The Unuk River is important to the  
3 customary and traditional food usage of the Ketchikan  
4 Indian community. We've been doing a great deal of  
5 monitoring on that river. I do want to express that  
6 Louie Wagner, who sits on the RAC from Metlakatla,  
7 who's actually Tongass, he's actually a Tlingit from  
8 the Ketchikan area, had expressed that the eulachon  
9 came in really, really, really thick and were missed by  
10 Mr. Hyde, that he left and the eulachon came in and it  
11 was like the old days, you could walk across it and so  
12 there has to be some change in how we're getting this  
13 data. And I want to say that the way that it's being  
14 managed as far as subsistence use is not in line with  
15 the customary and traditional way in which the people  
16 of Ketchikan and Metlakatla traditionally got eulachon  
17 in that area. It's a dangerous river, nobody takes  
18 their boat up by themselves and scoops out one bucket  
19 of eulachon. The way that eulachons have always been  
20 harvested in a traditional customary way for us is that  
21 a couple of boats who knew how to do it went up, they  
22 got the eulachon and then they would come to Ketchikan,  
23 you would then bring your buckets to the boat, you  
24 would grab your eulachons out of the boat at spring and  
25 you would take and put it up and you'd give the boat  
26 captain some cash, right, and for essentially gas. And  
27 then they would go ahead, I think they also went over  
28 to Prince of Wales at one time and did that and then  
29 they would bring it to Metlakatla and do that. And so  
30 when we're talking about the idea that -- you know, and  
31 so I agree, you know, limit to non-Federally-qualified  
32 users but it is never going to meet the need of the  
33 subsistence user because we're not harvesting it the  
34 way the subsistence user harvested it. And so I look  
35 forward to us submitting a proposal that meets the  
36 needs because the reality is one bucket does not meet  
37 the needs and we're not actually seeing what's going on  
38 in that area.

39  
40 And so I think this continued  
41 conversation as though one bucket for people who never  
42 go up there is ridiculous because it's not the way in  
43 which way we harvested it ever and so forcing us to  
44 harvest like people -- it doesn't make any sense and I  
45 just wanted to say that because it continues to  
46 frustrate both Ketchikan and Metlakatla about the way  
47 in which we're looking at that resource.

48  
49 And I want to say my Noni's turning 97  
50

0788

1 this year, she knows the difference between an eulachon  
2 from the Unuk River and an eulachon from the Stikine or  
3 one of these big fat eulachon from Anchorage and she  
4 wants to eat an eulachon from the Unuk River. She  
5 likes the way the eggs taste, she likes the way the  
6 tail is, I know the head's pretty good too, but she  
7 knows exactly when you try to pawn off a Stikine River  
8 eulachon or an eulachon from Anchorage on her and it's  
9 a taste that she wishes for constantly. And we  
10 maintain that the resource is close, we know you have  
11 to have that five, you know, that five years to know  
12 that it's abundant but we do have concerns in the way  
13 that the idea that we're ever going to harvest it in  
14 the way that's being proposed.

15  
16 CHAIRMAN CHRISTIANSON: Thank you.  
17 Appreciate your testimony. Any other tribal, Native  
18 organization like to speak.

19  
20  
21 (No comments)

22  
23 CHAIRMAN CHRISTIANSON: Hearing or  
24 seeing none, tribal, Advisory group testimony, State,  
25 AC, SRC, working group.

26  
27 (No comments)

28  
29 CHAIRMAN CHRISTIANSON: Hearing and  
30 seeing none, anybody in the public would like to speak  
31 to this proposal, online or in the house, raise your  
32 hand.

33  
34 (No comments)

35  
36 CHAIRMAN CHRISTIANSON: Thank you.  
37 Hearing none or seeing none, Regional Advisory Council  
38 Chair recommendation on this.

39  
40 MR. HERNANDEZ: Thank you, Mr.  
41 Chairman. Don Hernandez, again, for the Southeast RAC.  
42 The Council voted to support with a modification to the  
43 proposal to prohibit closing Federal -- prohibit to  
44 closing, that doesn't make sense -- proposal to close  
45 Federal public waters of the Unuk River to the harvest  
46 of eulachon except by Federally-qualified subsistence  
47 users harvesting in the Unuk River. Modification would  
48 be to close the entire District 1 to the harvesting of  
49 eulachons. The Justification in the Southeast  
50

0789

1 Council's intent in submitting the proposal was to  
2 protect subsistence use of eulachon population during a  
3 time of conservation concern. The proposed action with  
4 modification will protect the population by eliminating  
5 competing non-subsistence uses. The recommendation was  
6 made using both biological information from the  
7 Monitoring Program and local knowledge from a long time  
8 user on the Council. The proposed closure will be  
9 beneficial to subsistence users by providing for a  
10 limited harvest and promoting sharing amongst the  
11 community while restricting competing non-subsistence  
12 uses. The Council believes that this action will not  
13 necessarily restrict other uses as there is very little  
14 historical use by non-Federally-qualified users such as  
15 Juneau residents or non-residents.

16

17 Thank you.

18

19 CHAIRMAN CHRISTIANSON: Thank you. One  
20 question there, you guys said you had a consideration  
21 to do the whole unit one?

22

23 MR. HERNANDEZ: Yes, thank you. There  
24 was some testimony that eulachon, which were believed  
25 to, maybe originate in the Unuk River tend to migrate  
26 in some years and show up in other river systems and so  
27 in order to protect the whole run we decided it was  
28 appropriate to close the entire unit where eulachons  
29 may possibly be present from associated with the Unuk  
30 River.

31

32 CHAIRMAN CHRISTIANSON: Thank you.  
33 Yeah, I knew that, I just wanted to get that on the  
34 record as well. Because we see that in other areas, in  
35 other rivers, they sometimes just move to an adjacent  
36 stream or something for a year because the water  
37 quality was not sufficient. So, okay, thank you.

38

39 CHAIRMAN CHRISTIANSON: Alaska  
40 Department of Fish and Game's not here.

41

42 Do they oppose, yes. For the record  
43 they oppose.

44

45 InterAgency Staff Committee.

46

47 MS. LAVINE: The InterAgency Staff  
48 Committee did not provide a new comment to the deferred  
49 proposal. Thank you, Mr. Chair.

50

0790

1                   CHAIRMAN CHRISTIANSON:       Thank you,  
2 Robbin.   Board discussion, this is your opportunity to  
3 ask questions of the Chair, Liaison.

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

6  
7                   MR. INGERSOLL:   Mr. Chair.

8  
9                   CHAIRMAN CHRISTIANSON:       You have the  
10 floor.

11  
12                   MR. INGERSOLL:   Forest Service proposes  
13 to adopt request FP25-02 as modified by the Southeast  
14 Council.   If I have a second I'll explain my reasons  
15 for supporting the motion.

16  
17                   MR. STRIKER:   Park Service seconds.

18  
19                   MR. INGERSOLL:   Thank you.   There are  
20 some indications that the Unuk River eulachon run is  
21 beginning to recover and we are hoping that that  
22 recovery continues each year.   There continues to be a  
23 severe conservation concern and we believe this would  
24 be the first step towards providing more subsistence  
25 use than we currently are and we first need to close to  
26 non-subsistence users in order to be able to support an  
27 increased subsistence use when and if, which we hope  
28 will be soon, the run recovers.

29  
30                   Thank you.

31  
32                   CHAIRMAN CHRISTIANSON:       Thank you.  
33 Motion on the floor and seconded.   Any further debate,  
34 discussion, deliberation.

35  
36                   CHAIRMAN CHRISTIANSON:       Hearing and  
37 seeing none, any opposition to this motion as  
38 presented.

39  
40                   (No opposing votes)

41  
42                   CHAIRMAN CHRISTIANSON:       Hearing and  
43 seeing none motion carries unanimous for reasons stated  
44 by the Forest Service.

45  
46                   MR. INGERSOLL:   It was as actually as  
47 modified by the Southeast RAC and in deference to the  
48 RAC -- sorry.

49  
50

0791

1 CHAIRMAN CHRISTIANSON: Yes, thank you.  
2 Thank you for that clarification for the record. So  
3 moved.

4  
5 MS. LAVINE: The final item on the  
6 agenda is just to confirm upcoming Board meetings. The  
7 next one will be June 3rd, 2026. The Federal  
8 Subsistence Board will meet via teleconference Teams on  
9 Wildlife Special Actions 26-01, 02 and 03. August 4th  
10 and 5th, 2026 the Federal Subsistence Board will hold  
11 its summer work session here in Anchorage to discuss  
12 annual reports, Council letters and nominations as well  
13 as maybe a few other agenda items. And the Federal  
14 Subsistence Board fisheries regulatory meeting is  
15 scheduled for the week of February 1st through 5th of  
16 2027, venue still to be decided.

17  
18 And that is all, thank you, Mr. Chair.

19  
20 MR. STRIKER: Mr. Chair, quick  
21 question. Did we learn who won the art competition?

22  
23 MS. LAVINE: Mr. Chair, we did, and for  
24 awhile we had two winners, the first and the second  
25 listed at the back and I do not recall their names but  
26 the very first one was a beautiful picture of a sheep,  
27 dall sheep, yes. And then the second was a beautiful  
28 picture of two caribou and all of them were stunning  
29 and so the great thing is also that the remainder of  
30 the artwork that you actually saw will go into  
31 different locations in the next wildlife handbook.

32  
33 Thank you.

34  
35 CHAIRMAN CHRISTIANSON: Entertain a  
36 motion to adjourn.

37  
38 MS. PITKA: I make a motion to adjourn.

39  
40 CHAIRMAN CHRISTIANSON: Is there a  
41 second.

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

45  
46 CHAIRMAN CHRISTIANSON: Full  
47 concurrence, adjourn.

48  
49 (No opposing votes)  
50

0792

1                           CHAIRMAN   CHRISTIANSON:        Good job  
2 everybody. Appreciate all the hard work by the Staff,  
3 what a dedicated team, Haw'aa.

4

5

(Off record)

6

7

(END OF PROCEEDINGS)

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