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FEDERAL SUBSISTENCE BOARD MEETING  
VIA TEAMS  
JUNE 3, 2026

MEMBERS PRESENT:

- Anthony Christianson, Chairman
- Raymond Oney, Public Member
- Rhonda Pitka, Public Member
- Frank Woods, Public Member
- Jill Klein, U.S. Fish and Wildlife Service
- Greg Risdahl, U.S. Forest Service
- Jolene John, Bureau of Indian Affairs
- Kevin Pendergast, Bureau of Land Management
- Don Striker, National Park Service

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P R O C E E D I N G S  
(Teams - 6/3/2026)  
(On record)

MS. LAVINE: Hello everyone again.  
We're just about ready to start. This is the Federal Subsistence Board meeting for Wildlife Special Actions 26-01, 26-02 and 26-03. We'll be beginning the meeting very shortly after roll call, call to order and welcome and review and adopt the agenda. There will be one opportunity for tribes and ANCSA corporations and the public to give testimony on all three -- two agenda items. There will be (drop out) for testimony.  
Interest in the Special Action Request we're going to have to (drop out) testimony we are receiving. Hopefully not necessarily the amount but the length of each. So stay tuned for more instructions a little further into the meeting.

12                           At this point in time I would like to  
pass the mic to OSM Director Crystal Leonetti.

13

14                           MS. LEONETTI: All right. Thank you,  
Robbin. Welcome everybody. This is Crystal Leonetti.  
15                           Ciisquq is my Yup'ik name. I'm the director for Office  
of Subsistence Management. I'll go ahead and get  
16                           started with roll call. Chair Tony Christianson.

17

18                           CHAIRMAN CHRISTIANSON: Present.

19

20                           MS. LEONETTI: Public Member Charlie  
Brower.

21                           (No response)

22                           MS. LEONETTI: Charlie, if you're on  
the phone, you may need to unmute. Robbin, remind us  
23                           how we unmute ourselves on the phone.

24                           MS. LAVINE: Thank you. To unmute you  
may press \*6 on your phone to unmute yourself. You can  
25                           also press the unmute button if you're on Teams.  
Thanks.

0003                           MS. LEONETTI: I'll come back to  
Charlie just in case he's still calling in or having  
1                           technical difficulties.  
2                           Public Member Chief Rhonda Pitka.  
3                           MS. PITKA: Hi, I'm here.  
4                           MS. LEONETTI: U.S. Fish and Wildlife  
Service.

5

6                           MS. KLEIN: Good afternoon, Crystal.  
This is Jill Klein. I'm the InterAgency Staff  
Committee member and I'll be sitting in today for  
7                           Member Sara Boario with the U.S. Fish and Wildlife  
Service.

8

9                           MS. LEONETTI: Thank you, Jill.

10                           National Park Service.

11                           MR. STRIKER: Don Striker is here.

12                           MS. LEONETTI: Thanks, Don.

13                           Bureau of Indian Affairs.

14                           MS. JOHN: Good afternoon. Jolene John  
is here.

15                           MS. LEONETTI: Hi, Jolene. U.S. Forest  
Service.

16

MR. RISDAHL: Good afternoon, Crystal.  
17 This is Greg Risdahl. I'm the Subsistence Program  
Leader for the Forest Service and InterAgency Staff  
18 Committee member. I am acting for Deputy Regional  
Forester Nicole Grewe today. Thank you.

19

MS. LEONETTI: Thank you, Greg. Bureau  
20 of Land Management.

21 MR. PENDERGAST: Kevin Pendergast is  
here.

22

MS. LEONETTI: Hi, Kevin. Public  
23 Member Frank Woods.

24 MR. WOODS: Public Member Frank Woods  
present. Thanks.

25

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1 MS. LEONETTI: Thanks, Frank. Public  
Member Ray Oney.

2

MR. ONEY: I'm here.

3

MS. LEONETTI: All right. Thanks, Ray.  
4 And Public Member Benjamin Payenna is excused from this  
meeting while he attends a walrus hunt. I'll come back  
5 and see if we have Charlie Brower.

6 (No response)

7 MS. LEONETTI: All right. I think  
Charlie will be joining us shortly. For now, Mr.  
8 Chair, we have a quorum. So I'll hand the gavel over  
to you. I'd also like to note actually before you take  
9 over, Tony, and just noting that you were muted there  
for a second.

10

We do have a few other folks on the  
11 line just to let everyone know we have Department of  
Interior Solicitor Lisa Doehl. We also have the U.S.  
12 Forest Service General Counsel Randall Lockyear. And  
we have Alaska Department of Fish and Game Federal  
13 Subsistence Coordinator Aaron Poetter. We also have  
the Northwest Arctic Regional Advisory Council  
14 Vice-Chair Pattee. For the other Regional Advisory  
Councils pertinent to these Special Actions the Council  
15 Coordinators will be reporting on behalf of those  
Councils. So thank you all for joining us.

16

Now, Mr. Chair, I'll hand the gavel  
17 over.

18

CHAIRMAN CHRISTIANSON: Thank you  
there, Crystal. I appreciate it gladly everybody

19 calling in today for the meeting. Yeah, this is a  
20 pretty big issue, you know, access to hunting caribou.  
21 So, again, just appreciate everyone taking the time out  
22 of their summer to call in and deal with this. With  
23 that I'll turn it over to the Staff who will also  
24 present the analysis and get the meeting started.

25 Thank you, Crystal.

26 MS. LEONETTI: So first up is to review  
27 and adopt the agenda. Tony, if you want to entertain a  
28 motion.

29  
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1 CHAIRMAN CHRISTIANSON: Yes, I'll open  
2 up the floor for a motion so we can adopt the agenda as  
3 presented to review and adopt. So if there's a motion  
4 from the Board member at this time to accept the agenda  
5 as presented, the floor is open.

6 MS. LAVINE: Mr. Chair, this is Robbin.

7 CHAIRMAN CHRISTIANSON: Yes, Robbin,  
8 you have the floor.

9

10 MS. LAVINE: I would like to request an  
11 amendment to the agenda to include testimony as item  
12 number 3. So testimony would be item number three at  
13 the beginning of the meeting and item number four would  
14 be Temporary Special Action Request 26-01. Item number  
15 five would be 26-02 and item number six would be 26-03.

16 Thank you, Mr. Chair.

17 CHAIRMAN CHRISTIANSON: Yeah, so if  
18 there's no objection from anybody, that will be the  
19 order of the agenda today. Any objection from the  
20 Board for the amended change to the agenda?

21

22 MR. WOODS: Move to adopt the agenda as  
23 amended.

24 CHAIRMAN CHRISTIANSON: Thank you.

25 MR. STRIKER: Second. Second, Park  
26 Service.

27

28 CHAIRMAN CHRISTIANSON: Anybody opposed  
29 to the motion to adopt the agenda as presented with the  
30 amendment?

31

32 (No opposition)

33

34 CHAIRMAN CHRISTIANSON: Hearing no  
35 opposition motion carries unanimous to accept the  
36 agenda and I'll turn it back over to Staff. Thank you.

37

MS. LAVINE: Thank you, Mr. Chair. Now  
23 is the opportunity for the public to provide testimony.  
24 We will open the floor to official representatives of  
25 tribes and ANCSA corporations. The floor is open for  
0006 official representatives of tribes and ANCSA  
corporations to give testimony on all three requests.

1 To enter the queue you may raise your hand or press \*5.  
2 So once again, if you are an official representative of  
3 a tribe or an ANCSA corporation, please press \*5 or  
4 raise your hand.

5 Mr. Chair?

6 CHAIRMAN CHRISTIANSON: Yes, Robbin?

7 MS. LAVINE: There is one person who  
8 has entered the queue and that is Liz.....

9 MS. PITKA: One second, Robbin.

10 MS. LAVINE: Oh, you're right. Yeah,  
11 you're right. Folks, I did not do things in specific  
12 order.

13 CHAIRMAN CHRISTIANSON: Yeah, we've got  
14 an analysis so we can take testimony.

15 MS. LAVINE: Right. Well, actually --  
16 so I am sorry. I missed a couple of steps. So the  
17 first thing that we're going to do is we will have  
18 Staff read the issue statements from each Special  
19 Action Request. After he provides the Special Action  
20 Request we will then open the floor.

21 Thank you, Mr. Chair.

22 MR. PLANK: Thank you, Robbin. Thank  
23 you, Mr. Chair. For the record, Tom Plank, wildlife  
24 biologist, Office of Subsistence Management. For all  
25 three of these Special Actions being considered today  
they refer to the Western Arctic Caribou Herd and they  
pertain to any or all the Units 22, 23 or 26A west of  
the Colville River Drainage, upstream from the Nuka  
River and drainages to the Chukchi Sea, south and west  
of and including the Cook and Keurig River Drainages,  
which for now on out we'll just refer to as Unit 26A  
southwest.

26 Your comments are important for the  
27 Board to consider, not only for your intended Special  
28 Action but also for all three of these Special Actions.  
29 Therefore we wanted to give all commenters a chance to  
30 get their comments in before we move on to  
31 consideration of these Special Actions.

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1                   So to start with Wildlife Special  
2 Action WSA26-01. It requests reducing a caribou  
3 harvest limit in Units 22, 23 and 26A southwest for the  
4 2026-2027 regulatory year.

5                   Wildlife Special Action WSA26-02  
6 requests closing Federal public lands in Unit 22 to  
7 caribou hunting by non-Federally qualified users for  
8 the 2026 through 2028 regulatory cycle.

9                   And Wildlife Special Action WSA26-03  
10 requests closing Federal public lands in Unit 26A  
11 southwest to caribou hunting by non-Federally qualified  
12 users for the 2026-2028 regulatory cycle.

13                   Thank you, Mr. Chair.

14                   CHAIRMAN CHRISTIANSON: Thank you for  
15 the analysis. Any questions from the Board for the  
16 issue statement here, this is your time to ask.

17                   (No comments)

18                   CHAIRMAN CHRISTIANSON: All right.  
19 We'll move on to the next agenda item hearing no  
20 questions from the Board.

21                   MS LAVINE: It's now time for  
22 testimony. We have two people in the cue. We have two  
23 official representatives of tribes and ANCSA  
24 corporations. The first in the queue is Liz. Liz, can  
25 you please introduce yourself.

26                   MS. CRAVALHO: Yes. Thank you. I know  
27 my last name can be a little stanching. My name is Liz  
28 C-R-A-V-A-L-H-O and I serve as the Vice President of  
29 Lands for NANA Regional Corporation. NANA represents  
30 or is the regional corporation for 11 villages in  
31 Northwest Alaska within Game Unit 23 and 10 of our 11  
32 villages -- village corporations merged with NANA, so  
33 we work quite closely with our communities' land  
34 management issues as well as subsistence.

35                   NANA supports all three of these  
36 actions and recognize the importance of the Western  
37 Arctic Caribou Herd to our people in our region and  
38 appreciate the effort that our RAC has put into these  
39 proposals alongside the North Slope Region and others.  
40 About 69 percent of our shareholders who live in the  
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41 region rely on 50 percent or more subsistence resources  
42 for their household diet and caribou is a significant

2 portion of this.

3 During my time this past year working  
4 with our team we've consistently heard the concern for  
5 the herd, the desire to ensure that we're protecting  
6 the herd and we believe that these actions are in  
7 alignment with those efforts. That's it.

8 Thank you, Mr. Chair.

9 MS. LAVINE: Thank you, Liz. Next in  
10 the queue is Doreen Leavitt.

11

12 MS. LEAVITT: Thank you. Good  
13 afternoon, everyone. My name is Doreen Leavitt and I  
14 am the Director of Natural Resources as well as the  
15 Tribal Council Secretary for Inupiat Community of the  
16 Arctic Slope, which is the Federally recognized  
17 regional tribe up here across the North Slope serving  
18 eight villages.

19

20 So this is the third time our hunters  
21 in the past couple years of our region have had to  
22 reduce their harvest. Reducing harvest on cows makes  
23 perfect sense even though many of our elders love and  
24 prefer them. As we all know, eating our traditional  
25 foods is not only healthier for us, but a part of our  
26 cultural being. Harvest of bulls shouldn't have a  
27 negative effect on the population and managing the  
28 limit of bulls makes more sense as well.

29

30 Our people do not just feed their own  
31 families. They feed the whole community, share with  
32 other communities and feed our elders and widows. We  
33 don't recommend reducing the amount of tutu, of caribou  
34 that we harvest, but reducing the harvest of cows, like  
35 I said, makes sense.

36

37 Thank you. That's all I had.

38

39 MS. LAVINE: Thank you, Doreen. Next  
40 in the queue is Kelsi Ivanoff. Kelsi, you can unmute  
41 yourself by pressing \*6 or the unmute feature. Thank  
42 you. Kelsi Ivanoff. Oh, there you are.

43

44 MS. IVANOFF: Hi. Sorry. I was signing  
45 up for public. I'm not tribal or ANCSA representative.

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2 MS. LAVINE: Thank you. Hang on just a  
3 moment then. Do we have any other official  
4 representatives of tribes or ANCSA corporations? If  
5 so, you can press \*5 to enter the queue or raise your  
6 hand.

7

8 (No comments)

9

10 MS. LAVINE: Seeing none, we'll proceed  
11 to public testimony. You'll have about 20 minutes to

6 join the queue. We will be closing the queue around  
1:45. We have a lot of interest in this -- these  
7 Special Actions, so we need to keep public testimony  
down to a total of 30 to 45 minutes of the meeting if  
8 possible. Please be aware that others wish to speak  
and limit your comments to the most important brief  
9 points. Only one comment per person will be permitted.  
10 Once you call on please state your name  
for the record, where you are from and which proposals  
11 you are commenting on. We are taking again public  
comment on Wildlife Special Actions 26-01, 26-02 and  
12 26-03. To join the queue and provide public testimony  
please press \*5 to raise your hand or raise your hand  
13 on Teams to join the queue. First in the queue is  
Kelsi Ivanoff.

14  
MS. IVANOFF: I'm from Unalakleet.  
15 That's where I was raised and that's where I am  
currently raising my daughter. I also have family in  
16 Kotzebue, Nulato and St. Michael.

17 I am speaking -- or I work for Native  
Peoples Action as their indigenous stewardship  
18 director. I also sit on the Seward Peninsula RAC. I  
just want to make this super short. I know you guys  
19 have a lot to talk about. I am speaking to all three  
proposals and in support of these.

20  
In our last meeting it was very clear  
21 that we need to take measures in our control. We know  
predators are an issue, but right now the human factor  
22 and climate is an issue -- right now the human factor  
is something that is in our control and I think we need  
23 to take action now before it becomes an even more dire  
situation because it already is.

24  
We heard the numbers on hunter-killed  
25 cows in our area was 4,000 cows killed last year.

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1 That's a possibility of 200,000 caribou in those cows'  
lifetime. So hearing those numbers was very alarming.  
2 One cow caribou can produce up to 50 offspring in her  
lifetime. Children, grandchildren, great-grandchildren  
3 and so forth.

4 So I think measures need to be taken to  
protect them. Right now you guys are taking a step in  
5 the right direction and I really -- again, this is more  
so on behalf of myself. I know I stated my  
6 affiliations, but this is my own testimony.

7 Thank you.

8 CHAIRMAN CHRISTIANSON: Thank you for  
taking the time to call in. Go ahead, Robbin. You run

9 it, please. Thank you.

10 MS. LAVINE: Right now we have no one  
11 else in the queue to provide public comments. If you  
12 are interested in providing public testimony directly  
13 to the Board on all three Special Action Requests, you  
14 can do so by pressing \*5 to raise your hand. Once  
15 again \*5 to raise your hand and this will be the only  
16 time the Board is accepting public testimony on these  
17 Special Action Requests.

18 (No comments)

19 MS. LAVINE: Mr. Chair, it appears no  
20 one else is signing up to provide testimony to the  
21 Board. I would like to note that Regional Advisory  
22 Council Member Tristan Pattee is on and he has a  
23 limited time to join us right now. I think he needs to  
24 hop off -- does he need to hop off by 2:00 or by 3:00?

25 MR. PATTEE: By 3:00.

26 MS. LAVINE: Then we've got time to, I  
27 imagine, have you address your comments in the order of  
28 the agenda. Thank you, Mr. Pattee. Excellent.

29 Anyone else interested in addressing  
30 the Board and providing comments on all three Special  
31 Actions, this is the last opportunity to provide public  
32 testimony directly to the Board. We have -- David  
33 Hansen has just entered the queue. David, please  
34 address the Board.

35  
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1 MR. HANSEN: This is David Hansen or  
2 Alex Hansen. I don't know if it's an appropriate time  
3 for me to jump in, but I'm the caribou biologist for  
4 Alaska Department of Fish and Game. I work directly  
5 with the Western Arctic Herd.

6 You got me?

7 MS. LAVINE: Yes, we do. I imagine  
8 that you can address the Board now as a member of the  
9 public. It's good to know you're on. There may be  
10 opportunities for the Board to call on you if you're  
11 amendable during their discussion.

12 MR. HANSEN: Yeah, either way. I just  
13 want to make a brief comment and then I'm certainly  
14 available throughout the duration of the meeting if  
15 there are questions. If I can briefly comment on  
16 26-01. Originally as this proposal was written and it  
17 was drafted primarily at the Western Arctic Caribou  
18 Herd Working Group was to reduce the bag limit to four  
19 caribou. That included the single cow bag limit.

20 So, upon further review as we've gone

13 through various meetings, including ACs, SRCs and RAC  
14 meetings, that proposal has been submitted as amended  
15 to 15 caribou total, removing the cow from the bag  
16 limit. So I just wanted to make it clear to folks out  
17 there and kind of speak my recommendation to the Board  
18 that that's kind of what we're hoping for and that  
19 tracks with recent emergency order closure that we  
20 requested through the Board of Game -- or, sorry,  
21 through the State process.

22 So in alignment with the State  
23 regulations, if the Board were to consider adopting  
24 that regulation, which would be 15 caribou per year and  
25 eliminate the cow season, that would allow us to be on  
0012 the same regulatory path between the State and the  
Federal side and eliminate confusion in our efforts to,  
you know, work on conservation.

22 Thank you.

23 MS. LAVINE: Mr. Chair, we have Qinugan  
24 from NSB Planning in the queue.

25 CHAIRMAN CHRISTIANSON: You have the  
0012 floor.

1 MS. LAVINE: Qinugan, you may unmute  
2 yourself. If you're joining by phone, you can press \*6  
3 to unmute.

4 MS. RODDY: This is Qinugan Roddy. Can  
5 you hear me?

6 MS. LAVINE: Yes.

7 CHAIRMAN CHRISTIANSON: Yes.

8 MS. RODDY: Okay. I just have a  
9 question. If the State of Alaska or if they are going  
10 to be taking off the permitting of commercial  
11 recreation permits in these areas as well and, if so,  
12 that should be the first that should be not -- that  
13 should be regulated more and I just wanted to ask that  
14 question. That's all.

15 MS. LAVINE: Thank you. I do believe a  
16 lot of those questions will be addressed during the  
course of the meeting and through the analysis and then  
following discussion with the liaisons to the Board.

17 MS. RODDY: Okay. My recommendation is  
18 regulating the commercial req before regulating the  
19 subsistence users in those areas. Thank you.

20 MS. LAVINE: Thank you. Once again  
21 this is an opportunity to provide public testimony on  
22 all three Special Action requests. This will be your

17 only opportunity to provide your comments to the Board  
18 during this meeting. If you are interested in speaking  
19 directly to the Board, please raise your hand or press  
20 \*5.

19 (No comments)

20 MS. LEONETTI: Mr. Chair. I see that  
21 Charlie Brower has joined us. Charlie, are you here?  
22 You'll have to press \*5 to unmute or press the unmute  
23 button.

22 MS. LAVINE: It's \*6 to unmute.

23 MS. LEONETTI: Sorry. \*6. Charlie,  
24 are you able to unmute, I just want to make sure we can  
25 hear you. Uh-oh. I'll watch for him, Robbin. Thank  
0013 you.

1 MS. LAVINE: Thank you. Do we have  
2 anyone else who has not provided comments or testimony  
3 to the Board that wishes to do so now, you can raise  
4 your hand or press \*5.

3 Doreen Leavitt, if you wish, you can  
4 press \*6 to unmute yourself and finish your testimony.  
5 It sounds like you have a few more comments to provide  
6 to the Board. Doreen, are you there?

6 (No comments)

7 MS. LAVINE: Doreen did add to her  
8 testimony in the meeting chat that the ICAS is in  
9 support of Wildlife Special Actions 26-02 and 26-03 to  
10 close caribou hunting to non-Federally qualified  
11 hunters because of the status of the herd.

10 Thank you, Mr. Chair.

11 CHAIRMAN CHRISTIANSON: Thank you.  
12 Anything else from the Board.

12 (No comments)

13 CHAIRMAN CHRISTIANSON: Hearing none,  
14 what's next?

15 MS. LAVINE: Hearing none. We will  
16 proceed with Wildlife -- the analysis of Wildlife  
17 Special Action 26-01. I do believe that our Public  
18 Member Brower has joined us. Charlie, if you can press  
19 \*6 to unmute yourself, please do so now.

18 (No response)

19 MS. LAVINE: We'll work on that, Mr.  
20 Chair, but hopefully he's on and can hear. We are  
21 ready to proceed to agenda item number four, Wildlife  
Special Action 26-01.

MR. PLANK: Good afternoon, Mr. Chair.  
22 Members of the Board. My name is Tom Plank and I'm a  
Wildlife Biologist in the Office of Subsistence  
23 Management and I am also joined by Hannah Voorhees, an  
anthropologist for OSM and we will be presenting a  
24 summary of the analysis for Temporary Wildlife Special  
Action WSA26-01.

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1 WSA26-01 was submitted by the Western  
Arctic Caribou Herd Working Group and requests reducing  
2 the caribou harvest limit in Units 22, 23 and 26A  
southwest to four caribou per year, only one of which  
3 may be a cow for the 2026/27 regulatory year.

4 In 2025 the Western Arctic Caribou Herd  
Working Group assigned the management level critical,  
5 declining to the herd based on the current census and  
an adult cow survival rate of less than 80 percent. The  
6 Western Arctic Caribou Herd Working Group identified an  
immediate need to address the current herd decline by  
7 limiting the harvest of both bulls and cows to allow  
the herd population to stabilize and begin to recover.

8

9 The requested action is to ensure the  
viability of the Western Arctic Caribou Herd and to  
continue the subsistence uses of the caribou herd. The  
10 critical declining status of the Western Arctic Caribou  
Herd demonstrates the immediate need for a regulatory  
11 change before the next Federal Subsistence Board cycle  
as recovery is unlikely under existing regulations.

12

13 For the regulatory history there is  
very vast and it is included as an appendix, which  
starts on page 60, but in the interest of time I'm just  
14 going to touch on some of the most recent history for  
Western Arctic Caribou Herd.

15

16 In June 2023 the Board rejected the  
Wildlife Special Action WSA22-05 and WSA22-06, which  
requested the same harvest limit reduction as this  
17 request for the entire Western Arctic Caribou Herd  
range for the 2023-24 regulatory year. In 2024 the  
Board of Game adopted amended proposals that reduced  
18 the caribou bag limit in Units 22, 23 and the  
southwestern portion of 26A to the current 15 caribou  
19 per year, only one which may be a cow. The Board also  
adopted to establish a non-resident only drawing hunt  
20 with up to 300 permits for Unit 23.

21

22 In April of 2024 this Board adopted  
amended proposals that reduced the harvest limit to the

23 current 15 caribou per year, only one which may be a  
24 cow, and it also closed Unit 23 to caribou hunting by  
25 non-Federally qualified users from August 1st to  
0015 October 31st until the Western Arctic Caribou Herd  
exceeded 200,000 caribou.

1 In April of this year the Board also  
2 voted to maintain the status quo on Wildlife Closure  
3 Review WCR-2645 which address the Noatak Closure Area.  
4 And then last week ADF&G issued an  
5 emergency order closing the State resident hunting  
6 season for cow caribou in Units 22, 23 and 26A  
7 southwest. ADF&G's explanation states that given the  
8 long-term decline of Western Arctic Caribou Herd since  
9 2003 and decreases in harvestable surplus department  
10 estimate there was no harvestable surplus of cow  
11 caribou and, thus, harvest of cows is not warranted for  
12 regulatory year 2026-2027.

13 The Western Arctic Caribou Herd,  
14 Teshekpuk Caribou Herd and the Central Arctic Caribou  
15 Herd have ranges that overlap in Unit 26 and there  
16 could be considerable mixing of these three herds  
17 during the fall and winter. The Western Arctic Caribou  
18 Herd population has fluctuated over time from a low of  
19 75,000 in the 1970s to a peak of approximately 490,000  
20 in 2003. The herd has shown a decline in trends since  
21 the peak and the population estimate in 2025 was  
22 121,000.

23 To put that in perspective, the Western  
24 Arctic Caribou Herd has experienced a greater than 10  
percent decline each year just over the past five  
years. As for the composition data the Western Arctic  
Caribou Herd has exceeded the critical management level  
of 30 bulls per 100 cows since the 1970s. The  
long-term calving rate averages 70 calves per 100 cows.  
In 2025 the rate was up to 83 to 100 cows, but  
continues to fluctuate.

18 Recruitment has remained average at 17  
19 short yearlings per 100 adults. For the most part  
20 adult female survival has consistently been below the  
21 long-term average of 80 percent. Although factors  
22 contributing to this decline are not known with  
23 certainty, increased adult cow mortality and decreased  
24 calf recruitment and survival are likely playing a  
role.

25 From 1999 to 2018 the estimated total  
harvest from the Western Arctic Caribou Herd was about  
14,000 caribou per year ranging from 12-16,000 caribou

per year. Year specific harvest estimates have not  
25 been generated since 2018 in part because they were not  
0016 very accurate.

1  
2 Western Arctic Caribou Herd Working  
Group voted to place the herd in the critical decline  
3 level which prescribed a harvest of less than 6,000  
caribou when the herd is below 130,000. Household  
4 survey data demonstrates that local communities harvest  
parallel to the Western Arctic Caribou Herd  
5 availability rather than population trends.

6 Subsistence surveys from between 1964  
and 2021 show about 30 percent of caribou harvest in  
7 the range of the Western Arctic Caribou Herd has  
historically been cows. Local hunters account for  
8 approximately 95 percent of the total Western Arctic  
Caribou Herd harvest and residents of Unit 23 account  
9 for approximately 58 percent.

10 On average, 76 percent of the Western  
Arctic Caribou Herd harvested by non-locals are  
11 harvested in Unit 23 and between 2016 when the Federal  
land closures began in 2020, reported caribou harvest  
12 by non-local hunters in Unit 23 averaged 254 caribou.

13 The non-residents harvest was by  
harvest ticket until 2025 and is now by drawing permit  
14 in Unit 23. Although non-resident harvest information  
is generally considered reliable, these data after 2023  
15 were not received by us. A reported harvest by all  
user groups in Unit 22 since 2023 and for the other  
16 Unit 22 sub-units since 2016 is unavailable.

17 Similarly, recent reported caribou  
harvest information in Unit 26A Southwest is not  
18 available. With the 2025 population estimate of  
121,000 the harvestable surplus is roughly 5,500  
19 caribou. Actual harvest is unknown and could be much  
lower due to caribou being unavailable for harvest near  
20 local communities.

21 For this next section I'll go ahead and  
turn it over to Hannah Voorhees and she will take it  
22 from here.

23 MS. VOORHEES: Thank you, Tom. Next I  
will give a brief summary of the public hearing that  
24 was held for all three Special Action Requests. You  
can also look at page 13 in the analysis or summary.

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1 So a public hearing was held for all  
three requests on April 9th, 2026 by teleconference and  
2 in total 11 people testified. Three callers  
representing a mix of local and non-local residents  
3 voiced their support for WSA26-01. Those in favor said

4 that a harvest reduction has been needed for some time  
5 and should apply to all hunters. The importance of  
6 eliminating cow harvest and improving harvest reporting  
7 was also noted.

8 Two other callers did not state support  
9 or opposition to WSA26-01, but one asked the Board to  
10 honor the North Slope Council's recommendation.  
11 Another said there had not been enough information  
12 shared about the potential impacts on hunters. He said  
13 if this hunt is to be restricted, alternative resources  
14 and hunts should be made available to communities.

15 The next part of the analysis I'll  
16 present has to do with impacts to cultural knowledge  
17 and traditional practices. Limiting caribou harvest to  
18 four per year, only one of which may be a cow, per  
19 licensed hunter or registered hunter is likely to  
20 adversely impact many communities' overall harvest  
21 because some hunters provide for the wider community.

22 Subsistence surveys show that the  
23 average number of caribou harvested per local household  
24 had actually harvested caribou during survey years.  
25 These surveys are done by Division of Subsistence with  
0018 ADF&G. So the number of caribou harvested by local  
1 households that actually harvested caribou during these  
2 surveys was 8.1 in Unit 23, 8.7 in Point Lay and  
3 Wainwright, and 4.6 in Unit 22.

4 With high fuel prices and reduced  
5 harvest may mean that some hunters who provide for the  
6 wider community will not be able to justify the cost of  
7 hunting trips. Designated hunter permits could lessen  
8 these impacts as they allow a Federally qualified  
9 subsistence user to harvest for other Federally  
10 qualified subsistence users. However, these permits  
11 currently present some bureaucratic challenges to rural  
12 residents and may run counter to cultural norms.

13 As emphasized by local residents, in  
14 addition to regulatory changes there will be a need for  
15 continuous outreach and hunter education about why  
16 conservation is needed and how to translate the regs

17 into practice.

18 I'll turn it back over to Tom.  
19 MR. PLANK: Thank you, Hannah. Tom  
20 Plank, OSM. So next we're going to -- OSM considered  
21 several alternatives. I'll try to briefly get through  
22 these. I mean explain these to you all.

23 One alternative to consider was to  
24 eliminate cow harvest as supported by the Northwest

7 Arctic and Seward Pen Councils and the Kobuk Valley  
8 National Preserve, Cape Krusenstern and the Gates of  
9 the Arctic SRCs. Cow survival is the primary factor  
10 contributing to the Western Arctic Caribou Herd's  
11 decline. At several of the Council meetings ADF&G  
12 commented that an estimated 4,000 cows were being  
13 harvested per each year.

14 Another alternative to consider was to  
15 reduce the harvest limit to 10 caribou per year instead  
16 of the four caribou per year. Then an alternative was  
17 considered to use a differential harvest limit  
18 reduction across hunt areas.

19 The North Slope Council recommended  
20 reducing the harvest limit for the hunt areas affected  
21 in their region, which is Unit 26A Southwest and Unit  
22 23 Singoalik to 10 caribou per year, only one which may  
23 be a cow, while reducing the harvest limits in Unit 22  
24 and Unit 23 remainder to four caribou per year, only  
25 one which may be a cow, as proposed in this request.

26 I'd like to reference this to --  
27 there's a couple maps that show on Page 42 and 43 when  
28 considering this alternative. The maps on Page 42 show  
29 actual point locations of collared caribou by seasons  
30 since 2009 and a map on Page 43 are all location points  
31 for the last five years.

32 The next alternative considered was to  
33 establish a community harvest system. For the next one  
34 in Unit 23 Federal public lands are closed to  
35 non-Federally qualified users from August 1st to  
36 October 31st unless the Western Arctic Caribou Herd  
37 exceeds 200,000 caribou. Currently the Western Arctic  
38 Caribou Herd is far below the population threshold.  
39 One alternative considered was to extend the closure in  
40 Unit 23 to year round. Furthermore, the proponent

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1 expressed their support for WSA26-02 and WSA26-03.

2 The next alternative was a harvest  
3 limit restriction to non-Federally qualified users.  
4 This request only applies to Federal qualified users  
5 harvesting caribou under Federal regulations. So  
6 anyone harvesting on Federal public lands except  
7 National Parks and Federal lands in Unit 23 from August  
8 1st to October 31st could still harvest 15 caribou per  
9 year, one which may be a cow under the more liberal  
10 State regulations, negating the intended conservation  
11 impacts of this request.

12 Then the last alternative addressed

8 would be the extension to the 2027-28 regulatory years.  
9 This request, as it is, is only for the 2026-27  
10 regulatory year. Another Special Action Request would  
11 need to be submitted and approved to restrict Federal  
12 harvest for the 2027-28 regulatory years as a  
13 regulatory proposal could not be adopted until April  
14 2028 and be effective July 1st, 2028.

15 So if WSA26-01 is adopted, the Federal  
16 caribou harvest limits in Units 22, 23 and 26A  
17 Southwest would be reduced from 15 caribou per year,  
18 only one which may be a cow, to four caribou per year,  
19 only one which may be a cow for the 2026-27 regulatory  
20 year. The decreased harvest limit would reduce  
21 subsistence hunting opportunity and harvest under  
22 Federal regulations, but could help conserve the  
23 Western Arctic Caribou Herd and aid in its recovery.  
24 Which in turn could provide more subsistence hunting  
25 opportunities in the future.

26 Additionally, intentional harvest  
27 reduction to conserve the resources aligns with local  
28 cultural practices and values. All Alaska residents  
29 could still harvest 15 caribou per year under State  
30 regulations on Federal public lands in Units 22 and  
31 26(a), which could greatly limit the impact of adopting  
32 this request on both the Western Arctic Caribou Herd  
33 and subsistence users.

34 Federal regulations would also become  
35 more restricted than State regulations. And because  
36 Unit 23 Federal lands are closed to caribou hunting by  
37 non-Federally qualified users from August 1st to  
38 October 31st State regulations would not apply on  
39 Federal public lands in Unit 23 during this time,

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40 strengthening the conservation effects of this proposal  
41 harvest limit reduction within Unit 23.

42 National Park and Monuments, including  
43 those within Unit 23, are always subject to only  
44 Federal subsistence regulations. State regulations do  
45 not apply. Additionally a year-round closure applies  
46 to the Noatak Corridor Unit 23 as State regulations  
47 would not apply in this area above the mean high water  
48 mark. However, all users could still harvest caribou  
49 on the remaining Federal public lands in Unit 23 from  
50 November 1st to July 31st under the more liberal State  
51 regulations.

52 However, if both WSA26-02 and WSA26-03  
53 are approved, closing Federal lands in Units 22 and 26A  
54 southwest respectively in this conservation measure  
55 requested in WSA26-01 would be far more effective as

10 subsistence users could only harvest four caribou per  
11 year on Federal public lands under Federal regulations.  
12 And if Federal public lands remain open under the more  
13 liberal State regulation, subsistence users could still  
14 harvest 15 caribou and one cow, negating any  
15 conservation impacts of this request in Units 22 and  
16 26A southwest.

17 Another difference between State and  
18 Federal regulations in Units 22 and 26A Southwest is  
19 that calves may be harvested under State regulations  
20 while calf harvest is prohibited under Federal  
21 regulations.

22 In recent years no collared Western  
23 Arctic Caribou Herd have migrated into Unit 22.  
24 Therefore, any regulation changes in this unit are  
25 unlikely to affect Western Arctic Caribou Herd harvest.  
26 However, caribou movement and distribution are highly  
27 variable and portions of the Western Arctic Caribou  
28 Herd may return there in the future.

29 In contrast, collared Western Arctic  
30 Caribou Herd have continually been recorded year round  
31 in Unit 26A Southwest, highlighting the importance of  
32 protecting caribou cows and reducing harvest in this  
33 hunt area. If WSA26-01 is approved, all users could  
34 still harvest on Federal public lands under the more  
35 liberal State regulations.

36 So the OSM conclusion is to support

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1 Wildlife Special Action WSA26-01 with modifications to  
2 also eliminate the cow hunt and apply these harvest  
3 limit restrictions to the entire 2026-2028 wildlife  
4 regulatory cycle.

5

6 OSM supports measures to reduce  
7 conservation concerns for the Western Arctic Caribou  
8 Herd. The lengthy and precipitous decline of the  
9 Western Arctic Caribou Herd warrants strong measures to  
10 aid in recovery and conservation of this population.  
11 Current harvest rates, especially the taking of cows,  
12 could prolong or worsen the current decline and hamper  
13 recovery efforts.

14 Additionally, while causes of the  
15 decline are multi-faceted and uncertain, reducing human  
16 harvest is the most controllable factor. Specifically  
17 eliminating cow harvest and conserving as many cows as  
18 possible in the population is the most beneficial and  
19 controllable thing we can do.

20

21 OSM recognizes that eliminating cow  
22 harvest may significantly decrease food security for  
23 local users. Protecting cows now will help ensure more

13 caribou are available in the future. In addition to  
14 harvest restrictions and regulations there will be a  
15 need for continuous outreach in hunter education about  
16 why it is important to conserve cows and how to  
17 distinguish between cows and bulls.

18 Extending the harvest restriction to  
19 the entire 2026-2028 regulatory cycle helps ensure  
20 conservation measures for the Western Arctic Caribou  
21 Herd continue under Federal regulations. Western  
22 Arctic Caribou Herd populations are unlikely to recover  
23 in one or two years. A regulatory proposal to enact  
24 conservation measures and codified Federal regulations  
25 cannot be adopted until 2028. If further conservation  
26 measures are necessary before then, another Special  
27 Action could be submitted.

28 Thank you, Mr. Chair. Members of the  
29 Board. I would be happy to answer any questions you  
30 may have.

31 CHAIRMAN CHRISTIANSON: Thank you. Any  
32 questions from the Board for the analysis provided in  
33 the OSM conclusion.

34  
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1 (No comments)

2 CHAIRMAN CHRISTIANSON: Any further  
3 questions, comments.

4 (No comments)

5 CHAIRMAN CHRISTIANSON: Hearing none.  
6 What's the next agenda item, Robbin, sorry, I don't  
7 have my agenda on my lap.

8 MS. LAVINE: Thank you, Mr. Chair.  
9 Next on the agenda is summary of tribal and ANCSA  
10 corporation consultations. Orville.

11 MR. LIND: Can you hear me?

12 CHAIRMAN CHRISTIANSON: Yes.

13 MR. LIND: Okay. Thank you, Mr. Chair  
14 and Board members. There were no consultations on this  
15 WSA26-01, 02 or 03.

16 MS. LAVINE: Next on the agenda are  
17 Regional Advisory Council recommendations beginning  
18 with the Western Interior.

19

15 MS. PILCHER: Hello. This is Nissa  
Pilcher, Council Coordinator for the Western Interior  
Council, filling in for Chairman Reakoff.

16

17 The Council took up WSA26-01 and 02  
together and they chose to -- they recommended to defer  
to the home region for both. If I could back up, I'd  
18 also like to speak for Region 5, the Yukon-Kuskokwim  
Delta. They also took up WSA26-01 and 02 and they  
19 also deferred to the home region for both as well.

20 Thank you.

21 MS. LAVINE: Next comments are from --  
or recommendations are from the Seward Penn.

22

23 MS. CHAPA: Good afternoon. My name is  
Gisela Chapa. I'm the Council Coordinator for the  
Seward Peninsula Council and I am speaking on behalf of  
24 Chairman Green, who could not join us today. The Seward  
Peninsula Council supports WSA26-01 with the  
25 modification to change the caribou harvest limit to

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1 four bulls and zero cows per hunter per year in Units  
22, 23 and 26A Southwest.

2

3 The Council stresses that the Western  
Arctic Caribou population is in dire condition and  
eliminating cow harvest will help ensure the herd's  
4 future viability.

5 The Council at the time of the meeting  
received a concerning report indicating that 4,000 cows  
6 are estimated to be taken by hunters each year while  
the herd's current status does not support any  
7 harvestable surplus of females. Stressing that  
conserving cows is vital to the future of the herd.

8

9 The Council also further emphasized the  
need to reduce other causes of mortality such as  
predation, but concluded that human harvest is the only  
10 factor users can control to reduce cow mortality.  
Therefore, prohibiting cow harvest is a necessary  
11 measure.

12 The Council also acknowledged that this  
change in regulations will be an adjustment that  
ultimately benefits Federally qualified subsistence  
13 users in the long-term and four bulls should still  
provide sufficient subsistence opportunities.

14 Thank you.

15 MS. LAVINE: Next Regional Advisory  
16 Council is the Northwest Arctic.

17

MR. PATTEE: Thank you, Mr. Chair and

18 members of the Board. My name is Tristan Pattee. I  
19 live and am from Ambler. I am the Vice-Chair of the  
20 Northwest Arctic Subsistence Regional Advisory Council.

21 For WSA26-01 the Council voted to  
22 unanimously support with modification to eliminate the  
23 harvest of cows. The Council believes that this  
24 request is in the best interest of the Western Arctic  
25 Caribou Herd and to conserve the herd for future  
0024 generations.

1 The continued population decline of the  
2 Western Arctic Caribou Herd highlights the urgent need  
3 to implement sustainable practices so that the  
4 population may begin to recover. It is essential to  
5 protect our subsistence lifestyle and maintain the  
6 ability to pass on traditions and cultural knowledge to  
7 younger generations, ensuring the continuity of our way  
8 of life.

9 The current situation demands that we  
10 do everything possible to conserve the Western Arctic  
11 Caribou Herd and safeguard subsistence uses into the  
12 future. The Council noted that while these measures  
13 may be challenging in the short term, they will benefit  
14 us in the long term and are not intended to be a  
15 permanent change.

16 If we work together and act  
17 responsibly, the restrictions can be lifted once the  
18 herd rebounds. History shows that recovery is  
19 possible. The caribou population rebounded from 75,000  
20 in the 1970s and with collective action it can happen  
21 again. Given the current rate of decline the Council  
22 noted that there is a real fear that only a few years  
23 of hunting remain if the current level of take  
24 continues, which threatens our identity as caribou  
25 people.

1 Ultimately, while these changes may be  
2 difficult now they are a necessary investment for  
3 long-term benefit and the well-being of future  
4 generations.

5 For WSA26-02 the Council voted  
6 unanimously to support. For WSA26-03 the Council voted  
7 unanimously to support. The Council believes that in  
8 order for the continuation of subsistence uses and for  
9 the conservation of the Western Arctic Caribou Herd  
10 that this closure is necessary.

11 Thank you, Mr. Chair, and the members  
12 of the Board.

20

MS. LAVINE: Thank you, Mr. Pattee. I  
21 would note that the Western Interior had a few more  
22 comments that we did not get a chance to share. Nissa,  
23 would you like to pop back on?

MS. PILCHER: I sure would. Thank you  
24 for your patience with this, Members of the Board and  
25 those attending. The Council, in addition to deferring  
0025 as written, the Council believes that these requests,

1 which refers to WSA26-01 and 02, do not adequately  
protect the interests of subsistence users.

2

If this were to pass, there would be  
3 disparities between State and Federal regulations,  
4 making Federally-qualified subsistence users harvest  
5 limits significantly lower than the State bag limit and  
6 because not all of the Western Arctic Caribou Herd's  
7 range is included in this request. Additionally, the  
8 Council feels that the harvest of cows should be  
9 eliminated when the population is this low.

On a side note, WSA26-03 had not come  
10 out when the Western Interior Regional Advisory Council  
11 met. Thank you very much.

MS. LAVINE: Thank you, Nissa. Mr.  
12 Chair, Members of the Board, recommendation from the  
13 North Slope.

MS. CHAPA: Good afternoon again. My  
14 name is Gisela Chapa. Chairman Frantz was not able to  
15 attend, so I'm the Council Coordinator for the North  
16 Slope and I'll be sharing the Council's recommendation.

The Council supports WSA26-01 with the  
17 modification (drop out) the caribou harvest limit to 10  
18 caribou. Only one of which may be a cow per year per  
19 hunter in Units 26A southwest in the northwestern  
20 portion of Unit 23 which includes all drainages north  
21 and west of and including the Singoalik River Drainage.  
22 The Council supported changing the caribou harvest  
limits in Units 22 and 23 remainder to four caribou,  
only one which may be a cow per year per hunter as  
proposed in the submitted request.

The Council stated that imposing a  
23 caribou harvest limit of four caribou per year per  
24 hunter would greatly impact subsistence users of the  
25 communities of Wainwright, Point Lay and Point Hope and  
that a higher limit is necessary to ensure the  
continuation of subsistence uses of care.

22

Additionally, the Council stated that

23 the Western Arctic Caribou Herd does not generally  
24 occur in the southwestern portion of Unit 26A or  
25 northwestern portion of Unit 23 during the primary  
times of cow harvest as the entirety of the herd occurs  
further south.

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1 This modification demonstrates the  
2 Council's willingness to address the conservation  
3 concerns of the Western Arctic Caribou Herd while  
4 ensuring the subsistence needs of those three  
5 communities are met despite the impacts this harvest  
6 limit reduction presents to the subsistence users of  
7 the region.

8 The Council concluded that when  
9 management actions are needed to ensure the viability  
10 of the Western Arctic Caribou Herd population  
11 subsistence harvest limits should only be reduced after  
12 caribou harvest by non-Federally qualified users is  
13 addressed. To that end the Council submitted Wildlife  
14 Special Action 26-03, requesting closure of Federal  
15 public lands in Unit 25A southwest to caribou hunting  
16 by non-Federally qualified users for the 2026-2028  
17 regulatory cycle.

10

11 MS. LAVINE: Thank you, Gisela. Mr.  
12 Chair, Members of the Board. The next liaison to the  
13 Board who is providing comments is the Alaska  
14 Department of Fish and Game, Aaron Poetter.

15 MR. POETTER: Yeah, good afternoon, Mr.  
16 Chair and Members of the Board. Aaron Poetter with  
17 Alaska Department of Fish and Game.

18 Just to start out, I'd like to have the  
19 opportunity to speak to these Special Actions. So the  
20 Department, State of Alaska, we're opposed to all three  
21 special actions as written. As has already been  
22 mentioned we did -- we received a request from the  
23 Northwest Arctic Regional Advisory Council to reduce  
24 the State opportunity for caribou harvest to eliminate  
25 the harvest of cows.

19

20 We did recently issue an emergency  
21 order to that effect for the '26-'27 regulatory cycle  
22 -- regulatory year, which will begin in July of this  
23 year.

24 The elimination of cow harvest is  
25 consistent with what we have identified as a necessary  
step to hopefully stop the decline of the Western  
Arctic Herd and hopefully start a rebuilding process.

24

25 We have a regulatory -- obviously we  
have our own regulatory process through Board of Game,

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1 which is in cycle for Northwest Alaska this year. So  
2 in January the Board of Game will meet in Kotzebue to  
3 discuss proposals for which the Western Arctic Caribou  
4 Herd does have some proposals that have been submitted  
5 to our process.

6 We're really looking forward to getting  
7 everyone together to come to a consensus about next  
8 steps for management of this resource.

9 A couple other things to consider  
10 between for these Special Actions and what the Board  
11 may do and what will occur before the Board of Game  
12 meeting in January is that we do intend to conduct  
13 another photo census of the Western Arctic Herd to get  
14 another population estimate.

15 There will be another Western Arctic  
16 Caribou Herd Working Group meeting. We usually will  
17 get together to discuss the latest photo census and  
18 additional steps that may be necessary and to look at  
19 the most up-to-date information.

20 We would support regulatory alignment  
21 with what we have done through REO to leave the bull  
22 harvest at 15 per year with no cows. Of course we are  
23 always encouraging of regulatory alignment. And we do  
24 see the elimination of the cow harvest for now as to be  
25 an incremental step in the protection of this resource  
26 at the regular scheduled Federal Subsistence meeting  
27 back in April. There was a lot of talk about  
28 incremental management steps and what could be done.  
29 We believe what we've done fits that bill and is a good  
30 path forward.

31 So thank you. That's all I have.

32 MS. LAVINE: Thank you, Mr. Poetter.  
33 Mr. Chair, Members of the Board, the next item on the  
34 agenda is to hear from Advisory Group comments.  
35 Following that you will hear the InterAgency Staff  
36 Committee comments. Following the ISC comments that  
37 will be an opportunity to discuss with your liaisons to  
38 the Board, Council Chairs, the State Liaison and call  
39 on anybody you wish to answer questions.

40 If you do have questions for the  
41 representative of the Regional Advisory Councils or the  
42 State liaison, that would be a good time.

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1 Next in the queue or next on the agenda  
2 is Advisory Group comments.

3

3 MS. PATTON: Good afternoon Members of  
4 the Board. This is Eva Patton, Subsistence Program  
5 Manager, with the National Park Service. I will be  
6 providing the comments that were made by three of our  
7 National Park Service Subsistence Resource Commissions  
8 in the range of the Western Arctic Caribou Herd.

9 So all three Subsistence Resource  
10 Commissions were able to meet. The Special Action came  
11 up during their regularly scheduled and publicly  
12 noticed meetings. The Kobuk Valley National Park  
13 Subsistence Resource Commission and the Gates of the  
14 Arctic National Park Subsistence Resource Commission  
15 both votes to support WSA26-01 with modification to  
16 also eliminate cow harvest.

17 The Kobuk Valley SRC stated while  
18 they're concerned for those who may need a cow to put  
19 food on the table, the Western Arctic Caribou Herd  
20 population can't support it at this time. The future  
21 of the herd relies on taking a little more time to look  
22 for bulls. They also noted that it will be important to  
23 align State and Federal regulations and that there  
24 needs to be outreach and education about why there  
25 should be no harvest of cows.

26 The Gates of the Arctic SRC, which also  
27 supported WSA26-01 with modification to eliminate cow  
28 harvest, the Gates of the Arctic SRC said that while  
29 the Western Arctic Caribou Herd is declining there are  
30 no extra caribou and female caribou only have one calf.  
31 The Gates of the Arctic SRC would also like to avoid a  
32 full closure as occurred in the 1970s and it's vital to  
33 preserve the herd for future generations. Hunters  
34 should be able to tell the difference between a cow and  
35 a bull.

36 The Cape Krusenstern National Monument  
37 Subsistence Resource Commission also supported WSA26-01  
38 with the modification to eliminate cow harvest, but  
39 they didn't specify a limit on the bull harvest. So  
40 they stated that it's a difficult decision to eliminate  
41 the cow harvest and to reduce harvest overall. There's  
42 mixed feelings about that, but they feel that there's  
43 no choice given the continuous population decline and  
44 need to maximize the number of cows in the herd.

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45 Thank you, Mr. Chair. That concludes  
46 the comments for the SRCs.

47 MS. LAVINE: Mr. Chair, Members of the  
48 Council -- or Members of the Board, this is Robbin  
49 Lavine. I am the Subsistence Policy Coordinator for

4 the Office of Subsistence Management and the Chair of  
5 the InterAgency Staff Committee. I will provide the  
6 InterAgency Staff Committee comment on Wildlife Special  
7 Action 26-01.

8 The Federal Subsistence Board considers  
9 key sections of ANILCA Title VIII before taking action  
10 on proposals requesting closures or restrictions.  
11 Specifically those sections pertaining to Council  
12 deference and those pertaining to limitations to  
13 closures or restrictions of subsistence and  
14 non-subsistence uses on Federal public lands in  
15 Sections 815 and 816.

16 These three sections speak to the heart  
17 of Board authority and require a careful balance  
18 between the Federal priority, the continuation of  
19 subsistence uses, the necessary conservation of  
20 subsistence fish and wildlife and unnecessary  
21 restrictions.

22 In the case of Wildlife Special Action  
23 26-01, there are differing Council recommendations to  
24 consider when evaluating the criteria for deference.  
25 The Northwest Arctic and Seward Peninsula Subsistence  
26 Regional Advisory Councils supported WSA26-01 with  
27 modification to close to the harvest of cows.

28 The North Slope Regional Advisory  
29 Council supported WSA26-01 with modification to reduce  
30 harvest limits in Units 26A Southwest to 10 caribou,  
31 only one of which may be a cow. The North Slope  
32 recommendation to the Board includes information that  
33 the Western Arctic Caribou Herd does not generally  
34 occur in the southwest portion of Unit 26A during  
35 primary times for cow harvest. However, radio-collar  
36 and photo census data highlight the importance of this  
37 hunt area for the life cycle of the herd, including  
38 during the cow season, which opens July 16th.

39 The WACH core calving area is entirely  
40 within Unit 26A Southwest. The herd's summer range,  
41 which is critical for caribou cow health and

0030 reproduction in the fall, is mostly within Unit 26A.  
42 While this caribou herd spends more time in Unit 23  
43 than any other unit, as demonstrated by caribou collar  
44 data, Unit 26A is the next most used unit in their  
45 range. Forty percent of all GPS locations. Nearly  
46 every year some WACH caribou spend the entire winter  
47 within Unit 26A.

48 It's also important to note that this  
49 portion, Unit 26A Southwest, was separated out in  
50 previous regulatory decision-making as it was

7 considered core WACH habitat. However, the area to the  
8 east was omitted from Special Action Request and  
9 proposals restricting harvest due to overlap with the  
10 Teshekpuk and Central Arctic Caribou Herds, which are  
11 relatively healthy. The ISC recognizes there are North  
12 Slope communities that rely on the WACH for food  
13 security and cultural practices similar to other  
14 communities along the entire migratory range of the  
15 herd.

11

Thank you, Mr. Chair.

12

CHAIRMAN CHRISTIANSON: Thank you.  
13 Thank you for running the agenda for me as well,  
14 Robbin. I appreciate that today. So we've been  
15 presented with everything. Is there any other  
16 questions the Board has, any topics they'd like to get  
17 clarification on before we move for a Board action  
18 motion?

16

(No comments)

17

CHAIRMAN CHRISTIANSON: All right.  
18 Hearing none. We'll go ahead and open up the floor for  
19 the Board to make a motion.

19

MR. STRIKER: Mr. Chair. Don Striker  
20 with the Park Service. Following sort of the guidance  
21 from OSM as the lead in putting this relatively complex  
22 motion together, I would suggest that we take an  
23 approach of taking action on each aspect of WSA26-01  
24 and the potential modifications separately so that each  
25 Board member is able to clearly articulate  
26 recommendations on each aspect of this complicated one.

24

So my proposal to you would be that  
I'll start with the main motion, WSA26-01 as submitted  
25 by the Western Arctic Caribou Herd Working Group, and

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1 then address modifications to eliminate cow harvest,  
2 and then apply the restriction to the entire 2026-2028  
3 wildlife regulatory cycle, and then address the  
4 restriction to four caribou per year and take up any  
5 other further modifications that Board members want.

4

If that sounds good to you, I'll start  
with my first motion.

5

CHAIRMAN CHRISTIANSON: That sounds  
6 good to me. So just so the Board is aware what Mr.  
7 Striker is saying is we're going to make a main motion  
and then we're going to amend the motion, motion to  
amend.

8

MR. STRIKER: All right. So, Mr.  
9 Chair, I move to adopt Wildlife Special Action 26-01,  
as submitted by the Western Arctic Caribou Herd Working  
10 Group, to reduce the caribou harvest limits in Units  
22, 23 and 26A west of the Colville River Drainage  
11 upstream from the Nuka River and the drainage of the  
Chukchi Sea, south and west of and including the Kuk  
12 and Kugruk River Drainages -- in other words Unit 26A  
Southwest -- to four caribou per year, only one of  
13 which may be a cow.

14 Now if I get a second, I will request  
to address a modification proposed by the Northwest  
15 Arctic Subsistence Regional Advisory Council to  
eliminate cow harvest.

16

MR. PENDERGAST: BLM seconds.

17

MR. STRIKER: Thanks, Kevin. Mr.  
18 Chair, as my second motion I move to adopt the  
modification.....

19

MR. PENDERGAST: Wait.

20

MR. STRIKER: Go ahead.

21

CHAIRMAN CHRISTIANSON: I'm sorry. Was  
22 there somebody trying to ask a question of Don?

23 MR. PENDERGAST: Mr. Chair, this is  
BLM. Just kind of point of order. I think we act on  
24 each amendment individually or.....

25

CHAIRMAN CHRISTIANSON: Yeah.

0032

1 (Indiscernible) last one, so you come back to each one,  
yeah, chronologically.

2

MR. STRIKER: I see. Thank you for  
3 ligating my confusion.

4

CHAIRMAN CHRISTIANSON: Okay. Thank  
you.

5

MR. STRIKER: So, Mr. Chair.....

6

CHAIRMAN CHRISTIANSON: There's an  
7 amendment to the original motion and he needs a second.  
We need a second for the amendment.

8

MS. LAVINE: Mr. Chair. Before we  
9 proceed can we hear from Solicitor Lisa Doehl? And  
then Jolene John also has her hand raised.

10

11 floor.  
12

13 MS. DOEHL: Yeah, I did not want to  
14 address the motion, rather the process.

15 CHAIRMAN CHRISTIANSON: So we could  
16 still use a second because it's just an amendment  
17 before we get deeper. It's only one in. So could I  
18 get a second and we could discuss it?

19 MR. RISDAHL: This is the Forest  
20 Service, Mr. Chair. We second the motion.

21 CHAIRMAN CHRISTIANSON: Thank you. So  
22 we have an amendment by Don Striker to the original  
23 motion. Now the floor is open for discussion on  
24 process. Go ahead.

25 MR. STRIKER: And maybe if I just  
26 finish reading that motion that got seconded. The full  
27 motion was to adopt the modification proposed by  
28 Northwest Arctic Subsistence Regional Advisory Council  
29 to eliminate the harvest of cows and the OSM  
30 modification to apply harvest restrictions for the  
31 entire 2026-2028 wildlife regulatory cycle. Just so  
32 that's on the record. That's the amendment.

33 CHAIRMAN CHRISTIANSON: Thank you.  
34 Questions on process. Ms. Johns, you have the floor.

0033  
1 Jolene.

2 MS. JOHN: Yeah, thank you, Mr.  
3 Chairman. My question is an ask for -- too of the  
4 National Park Service in terms of who this applies to.  
5 I think we need to get that clarified because we have  
6 multiple users we're addressing here.

7 CHAIRMAN CHRISTIANSON: So as far as it  
8 goes, Don, is the next couple just users?

9 MR. STRIKER: So the next modification  
10 that I would propose would address the users and modify  
11 the current proposal, which is only Federally-qualified  
12 subsistence users. The next modification that I will  
13 be proposing is to extend that to all users.

14 CHAIRMAN CHRISTIANSON: Does that help  
15 answer your question, Jolene?

16 MS. JOHN: Yes, it does. Thank you.

17 CHAIRMAN CHRISTIANSON: Thank you.  
18 Solicitor, did you have any other questions about  
19 process or comments about how we're leading this?

20 MS. DOEHL: Through the Chair, yes. I  
21 just wanted to, I guess, understand or be clear that

15 what was being considered was an amendment to the  
16 original motion and that the Board was deliberating on  
17 whether to amend the original motion with the amendment  
18 that was proposed.

19 CHAIRMAN CHRISTIANSON: 10-4.

20 MS. DOEHL: So there would be a vote on  
21 whether to amend the original motion followed by  
22 possibly another vote to do a different amendment that  
23 I understand might be proposed, but ultimately after  
24 all the votes on the amendments then there would be a  
25 vote on the motion with whatever amendments the Board  
26 decides it wants to move forward with.

27 MR. STRIKER: Exactly. Which I'll need  
28 a lot of help putting it together in that final motion.

29 MS. DOEHL: Okay.

30 CHAIRMAN CHRISTIANSON: So, yeah. So

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1 now we have two motions on the floor that have gotten a  
2 second and it's to amend the original. So we have the  
3 original -- we have the amended with a second. Don,  
4 you have the floor for the third.

5

6 MR. STRIKER: So I was going to just  
7 roll through the justification for this one and maybe  
8 vote on this amendment first, Mr. Chair, if that makes  
9 sense.

10 CHAIRMAN CHRISTIANSON: I think that's  
11 what the solicitor is asking us for. I appreciate  
12 that. Thank you.

13 MR. STRIKER: So the National Park  
14 Service intends to vote in favor of this amendment and  
15 we support eliminating cow harvest for all users across  
16 Units 22, 23 and 26 in deference to the Northwest  
17 Arctic and the Seward Pen Regional Advisory Council  
18 recommendations. Additionally, Kobuk Valley, Cape  
19 Krusenstern, Gates of the Arctic Subsistence Resource  
20 Commissions fully supported this important conservation  
21 action.

22 We heard a bunch about the lengthy and  
23 precipitous decline of the Western Arctic Caribou Herd  
24 and I think that warrants strong measures to make sure  
25 that we aid in the recovery and conservation of this  
26 population. Current harvest rates, especially taking  
27 cows, will prolong or worsen the current decline and  
28 hamper recovery efforts.

29 Additionally, while causes of the  
30 decline are multi-faceted and uncertain, reducing human  
31 harvest is the most controllable factor. We're at the

19 threshold of population viability being a concern for  
20 both the future of the caribou and subsistence  
21 communities that depend on it.

22 The support from the two RACs and the  
23 three SRCs clearly articulates that taking this step  
24 now to protect cows is necessary to ensure the  
25 continuation of subsistence for future generations.  
0035 Conserving as many cows as possible in the population  
1 by eliminating cow harvest is the most beneficial and  
2 controllable thing that we can do.

3 The Park Service recognizes that  
4 eliminating cow harvest may decrease food security for  
5 local subsistence users, especially in those areas  
6 where the caribou migration may occur during the rut.  
7 Protecting the cows now is essential to ensure  
8 reproduction so that the precipitous decline can be  
9 slowed and so that more caribou will be available to  
10 continue to sustain rural subsistence communities in  
11 the future. Protecting cow survival rates is crucial  
12 for population recovery.

13 We heard the State of Alaska recently  
14 issued an emergency order to close to the harvest of  
15 cows to all users across all three units as well. If  
16 adopted by the Federal Subsistence Board, this closure  
17 would be in effect for all users across all State,  
18 private and Federal lands in Unit 22, 23 and 26A  
19 Southwest.

20 This unified conservation effort will  
21 have clear benefit for the caribou throughout much of  
22 the range of the herd. It will also be helpful for  
23 clear messaging to all affected communities and a  
24 unified conservation message throughout the region.

25 Of course, in addition to the harvest  
26 restrictions we heard that we're going to need  
27 continuous outreach and hunter education about why it's  
28 important to conserve cows and the Park Service is  
29 fully committed to working with all of our partners to  
30 make sure that we're supporting this effort.

31 Finally, I'll just comment that, as  
32 noted by OSM, extending this harvest limit restriction  
33 to the entire 2026-2028 regulatory cycle helps ensure  
34 conservation measures for the herd continue under  
35 Federal regulations as the population is unlikely to  
36 recover in a year or two.

37

20 Thank you, Mr. Chair.

21 CHAIRMAN CHRISTIANSON: Thank you, Don.  
22 So we've got an amendment to the original motion with  
23 the justification for this amendment. Is there any  
24 questions for the Board before we vote on it and before  
25 we vote I'd like to just have Don read the amended  
0036 motion for the record so we know what we're voting on  
1 that. Thank you.

2 MR. STRIKER: All right. Give me a  
3 fraction of a second to consult with Eva to help get  
4 that.

5 (Pause)

6 CHAIRMAN CHRISTIANSON: Hello. Sorry.  
7 I lost you guys. I got cut out there.

8 MS. LAVINE: Hello, Mr. Chair. This is  
9 Robbin, Subsistence Policy Coordinator for OSM. Don is  
10 huddling with his staff.

11 CHAIRMAN CHRISTIANSON: Okay. Yeah, I  
12 just felt like I got cut lost there. While they're  
13 huddling I'm here struggling.

14 (Laughter)

15 MR. PENDERGAST: Mr. Chair, this is  
16 BLM. We finished everything up while you were off  
17 there.

18 CHAIRMAN CHRISTIANSON: That was like a  
19 one time in space. I was like, oh, I'm back.

20 MR. STRIKER: I think, Tony, what  
21 you're -- Mr. Chair, what you're waiting for is for me  
22 to restate the motion with the amendment included.

23 CHAIRMAN CHRISTIANSON: Yes, restate  
24 the amendment included. That will be the amended  
25 motion that we'll have to go back to the original  
26 motion for. So as we build each amendment we'll just  
27 read the justification into a quote on that and then  
28 make sure that we've put it in the record that we got  
29 it reflected all the way back to the original motion.  
30 So we'll be basically crafting the original motion as  
31 we go. So I think that's what we're doing here.

32 MR. STRIKER: So I think I can do this  
33 two different ways. What the Park Service is  
34 supporting is Wildlife Special Action WSA26-01 with  
35 modification to eliminate cow harvest and apply the  
36 harvest limit restrictions to the entire 2026-2028

wildlife regulatory cycle.

23

24 I think the new motion would be a move  
25 to adopt Wildlife Special Action 26-01 as submitted by  
the Western Arctic Caribou Herd Working Group to reduce  
the caribou harvest limits in Units 22, 23 and 26A west

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1 of the Colville River Drainage, upstream from the Nuka  
River and the drainages of the Chukchi Sea, south and  
2 west of and including Kuk and Kougarok River drainages,  
Unit 26A Southwest, to four caribou per year. And to  
3 ensure that this harvest limit restriction applies to  
the entire 2026-2028 wildlife regulatory cycle.

4

Hopefully somebody wrote that down.

5

MR. PENDERGAST: Mr. Chair.

6

CHAIRMAN CHRISTIANSON: You have the  
7 floor.

8

9 MR. PENDERGAST: This is BLM. I would  
like to try to clarify here. I think all we're  
10 considering at the moment is the modification. So we  
can just focus on that and have our vote. I mean at  
the end we'll have a final main motion, which will have  
been likely modified, which we'll have to piece  
11 together based on whatever modification is asked, but I  
don't know that we need to do that at each step.

12

13 I was just going to suggest that maybe  
we just focus on each modification, vote on that.  
Right now the modification on the floor is elimination  
14 of cow harvest and elimination of the OSM mod for  
extending it through '28. That's my understanding.

15

16 MS. LEONETTI: That's right. Mr.  
Chair, this is Director Crystal Leonetti. Kevin is  
right. The amendments, according to Roberts Rules of  
17 Order should be taken up as a stand-alone amendment.  
So there can be numerous primary amendments to the main  
18 motion. They have to be discussed and voted on  
individually, one at a time, followed at the very end  
19 by a vote on the main motion, which would then include  
each of the amendments, either rejected or adopted.

20

21 So this current amendment by the Park  
Service is to eliminate cow harvest across Units 22, 23  
and 26A Southwest and extending that action through the  
22 2028 regulatory year.

23

Is that right, Don? I just want to  
make sure we got that correct.

24

MR. STRIKER: Spot on. Thank you.

25

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1

MS. LAVINE: Mr. Chair. We have a number of people -- a number of Board members who wish to address the Chair. We have Jill Klein and we have Charlie Brower.

3

4

MS. KLEIN: Hi. Thank you. This is Jill with U.S. Fish and Wildlife Service. I just wanted to clarify per Member Jolene John's question about who this applies to. I thought that Member Striker had added that this would also be for all users and that that was part of the amendment. I just wanted to clarify that.

7

8

CHAIRMAN CHRISTIANSON: Jill, that will be part of the amendment, but we're not there yet. We're passing this amendment understanding that we're going to amend it at another time. We're going to vote on each of them as we go.

10

11

MS. KLEIN: Okay. So not assigning a current -- who this applies to is necessary at this time.

12

13

CHAIRMAN CHRISTIANSON: Not at this time. We're going to do that here in about one minute when we vote on this.

14

15

MS. KLEIN: Okay. Thank you.

16

CHAIRMAN CHRISTIANSON: Who else wanted the floor? Just Jolene?

17

MS. LAVINE: Charlie, did you wish to address the Chair or the Board?

18

19

(No response)

20

CHAIRMAN CHRISTIANSON: Hearing none, let's do a Board vote. Could you do roll call on this, please.

21

22

MS. LAVINE: Yes.

23

CHAIRMAN CHRISTIANSON: And for the record please read the amended motion into the record.

24

MS. LEONETTI: Okay. So the amendment to the main motion is to eliminate cow harvest across Units 22, 23 and 26A Southwest. There was a geographic

25

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1 description that Don read into the record with that.  
2 And extend the action through the 2027-2028 regulatory  
3 year. I'll just pause and double check with Mr.  
4 Striker that I got that correct.

5

6 MR. STRIKER: Yes, you did, even though  
7 I butchered some of my pronunciations, I think. So I  
8 appreciate your abbreviated version.

9

10 MS. LEONETTI: Okay. Thank you. All  
11 right. Roll call vote. I will start with Public Member  
12 Rhonda Pitka.

13

14 MS. PITKA: Public Member Rhonda Pitka  
15 votes to support. Thank you.

16

17 MS. LEONETTI: Thank you. And Public  
18 Member Charlie Brower.

19

20 MR. BROWER: Hello. Can you hear me?

21

22 MS. LEONETTI: Yes.

23

24 MR. BROWER: Support. To support.

25

26 MS. LEONETTI: Thank you. U.S. Fish  
27 and Wildlife Service.

28

29 MS. KLEIN: Hi, this is Jill. We  
30 support.

31

32 MS. LEONETTI: Thank you. Bureau of  
33 Indian Affairs.

34

35 MS. JOHN: Yeah, BIA votes to support,  
36 which includes elimination of the current harvest of  
37 cows and defers to the RAC recommendations that the  
38 Seward Peninsula and the Northwest Arctic, plus the  
39 extension into the future. We feel that the importance  
40 of harvesting cow caribou and focusing on harvest on  
41 bulls leads to help conserve the caribou population  
42 subsistence hunters should target the bulls whenever  
43 possible.

44

45 MS. LEONETTI: Thank you. Public  
46 Member Ray Oney.

47

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

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1 MS. LEONETTI: Thank you. Public  
2 Member Frank Woods.

3

4 MR. WOODS: Public Member Frank Woods

3 votes to support.

4 MS. LEONETTI: Thank you. Bureau of  
Land Management.

5

6 MR. PENDERGAST: I support the  
modification in deference to the RACs. It's clear that  
7 the Western Arctic Caribou Herd population is at a  
critical declining level. One of the main factors  
8 causing the herd's decline -- and we've heard this in  
other cases as well -- is high cow mortality.  
9 Subsistence users have expressed, as we often hear,  
that cows are typically preferred especially during the  
rut when bull meat is less palatable.

10

11 So we're all in agreement here -- the  
RACs, State of Alaska -- eliminating cow harvest will  
12 have one of the biggest impacts in helping the herd  
recover. As we know, Fish and Game submitted an  
13 emergency order I believe just last week to this very  
end. So this is a clear action we can and should take  
at this time. That's why I support it.

14

15 MS. LEONETTI: Thank you. National  
Park Service.

16 MR. STRIKER: Park Service supports for  
reasons I already articulated. Thank you.

17

18 MS. LEONETTI: Thank you. U.S. Forest  
Service.

19

20 MR. RISDAHL: The U.S. Forest Service  
also supports in deference to the RACs and SRCs and all  
the information and justifications that have been given  
21 by our colleagues with the Park Service and BIA. Thank  
you.

22

23 MS. LEONETTI: Thank you. Chair Tony  
Christianson.

24

25 CHAIRMAN CHRISTIANSON: I support as  
stated on the record here by the Board members.

26

MS. LEONETTI: Thank you. Mr. Chair,

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1 the amendment to the main motion passed unanimously.

2

3 CHAIRMAN CHRISTIANSON: Thank you. Now  
the floor is open for any other Board actions.

4

5 MR. PENDERGAST: Mr. Chair.

6

7 CHAIRMAN CHRISTIANSON: Yes, you have  
the floor, Don.

8

9 MR. PENDERGAST: This is Kevin  
Pendergast with BLM. Mr. Chair, I move to defer the

7 request -- the main Wildlife Special Action Request to  
8 restrict Federal harvest limits until the fisheries  
9 regulatory meeting in February. If I get a second,  
I'll explain why I support my motion.

10 MR. STRIKER: Park Service seconds.

11 MR. PENDERGAST: Thank you. Mr. Chair,  
12 first the data suggests that the primary cause -- and  
13 we've just been talking about this -- the primary cause  
14 of the herd's decline has been high cow mortality  
rates. We just took clear action to address this and  
voted to eliminate cow harvest. This was the action  
that is expected to best help with herd recovery.

15 Meanwhile, bull:cow ratios are high.  
16 In 2024 it was estimated there were 44 bulls to every  
17 100 cows. Despite the overall herd status this clearly  
18 suggests that there's a harvestable surplus of bulls.  
It would be very valuable to us to first see the impact  
of the action we've taken, eliminate cow harvest,  
before restricting further harvest of bulls.

19 Second, restricting Federal harvest  
20 limits would result in a misalignment in regulations  
21 and this can be a detriment to Federal subsistence  
22 users. The intent of our program is to provide a  
23 priority for subsistence users overall other uses and  
24 we need to be cautious about restricting Federal users  
25 before the State has implemented similar restrictions  
on sport users.

26 There may also be unexpected  
27 consequences on the ground by restricting Federal  
28 subsistence users. When you look at the map, it's a  
29 little patchwork. There's a lot of different land  
30 ownership happening and it's not monolithic certainly

0042  
31 in terms of Federal lands. So there may be -- this  
32 could lead to overcrowding on State lands, including  
33 gravel bars where the harvest limits are more liberal.

34 Also, restrictions on Federal lands  
35 would disproportionately effect residents of  
36 communities largely surrounded by Federal lands  
37 compared to residents of communities with access to  
38 State lands.

39 The Board of Game will act on a similar  
40 proposal in January and that would set us up very  
41 nicely in our fisheries meeting in February to take  
42 this up and take appropriate action at that time. At  
43 that point we'd be more able to clearly consider  
44 harvest restrictions without compromising a preference

9 for Federal users.  
10 Thank you, Mr. Chair.  
11 CHAIRMAN CHRISTIANSON: Thank you,  
12 Kevin. Any questions or comments from the Board on the  
13 motion to defer?  
14 MR. BROWER: Mr. Chair.  
15 CHAIRMAN CHRISTIANSON: Yes, you have  
16 the floor, Charlie.  
17 MR. BROWER: Your amendment to this is  
18 to defer WSA26-01 in January?  
19 CHAIRMAN CHRISTIANSON: I think the  
20 intent here now, Charlie, is that we've amended the  
21 motion with the ISC recommendation to just bull only,  
22 but not to mess with the harvest limit. So right now  
23 if we deferred any further Board action to the next  
24 meeting we would now be making a Federal regulation for  
25 15 bull harvest, which would align with the State and  
0043 give us time to look at the ratios and user status and  
1 access. So that's where we're at right now and that's  
2 what Kevin is representing.  
3 MR. BROWER: Thank you.  
4 CHAIRMAN CHRISTIANSON: Any other Board  
5 questions, clarifications, discussion, deliberation?  
6 MR. BROWER: Question.  
7 CHAIRMAN CHRISTIANSON: Hearing none,  
8 roll call. Roll call, please.  
9 MS. LEONETTI: Okay. So I'm going to  
10 state the amendment as I understand it. It is to amend  
11 the main motion to defer bull harvest reduction or  
12 restriction when it's -- until the February fisheries  
13 regulatory Federal Subsistence Board meeting.  
14 I'll pause and make sure with Mr.  
15 Pendergast. Is that correct?  
16 MR. PENDERGAST: That's correct. I  
17 just wish to make clear that the overall effect if we  
18 take this action would still be to have eliminated cow  
19 harvest for this upcoming season and then we can take  
20 up the bull issue if we choose in the fisheries cycle.  
21 MS. LEONETTI: Correct. Because if  
22 this one either fails or passes we still have to vote  
23 on the main motion, which would include the first  
24 amendment which did pass. So that's still in effect.  
25 MR. PENDERGAST: Yes. Thank you.

14 CHAIRMAN CHRISTIANSON: And I think  
15 really the justification here for the Board is that if  
16 we went further and started to be more restrictive,  
17 we'd be more restrictive than the State hunting regs  
18 and I think we're trying to avoid that. So I  
19 appreciate the effort by the Board here to not take  
20 away the harvest amount with the surplus available.

21 MS. LEONETTI: Mr. Chair, are we ready  
22 for the roll call now?

23 CHAIRMAN CHRISTIANSON: Roll call,  
24 please.

25 MS. LEONETTI: Okay. I'm going to  
0044 start out with Bureau of Indian Affairs.

1 MS. JOHN: So the Bureau of Indian  
2 Affairs votes in opposition to this amendment to defer,  
3 reducing the bull harvest until the future Board of  
4 Game meetings, which is not a certain future action  
5 that may or may not take. Certainly we're currently  
6 concerned about the caribou conservation issues and its  
7 population. This is just going to exacerbate it if we

8 delay it any longer.

9 MS. LEONETTI: Thank you. Public  
10 Member Ray Oney.

11 MR. ONEY: Support.

12 MS. LEONETTI: Thank you. Public  
13 Member Frank Woods.

14 MR. WOODS: Public Member Woods moves  
15 to support.

16 MS. LEONETTI: Thank you. BLM.

17 MR. PENDERGAST: BLM supports.

18 MS. LEONETTI: Thank you. National  
19 Park Service.

20 MR. STRIKER: Park Service supports for  
21 the reasons so carefully articulated by my colleague  
22 from BLM.

23 MS. LEONETTI: Thank you. U.S. Forest  
24 Service.

25 MR. RISDAHL: The Forest Service  
opposes this amendment and we do because we feel that  
this herd has been in decline for a long time as the  
State has stated since 2003. We agree with the  
Regional Advisory Councils and the SRCs that this

17 should happen now. We should not wait any longer.  
18 It's critical that we try to reduce this decline as  
19 soon as we can. We've all agreed that the cow harvest  
20 initially needs to be reduced, but I believe that the  
21 bull harvest should also be reduced.

22 The State has also noted that the  
23 average harvest of this herd is around 14,000 a year  
24 and the harvestable surplus is 5,500. If we continue  
25 with the harvest limit as it is, we're very likely to  
0045 overshoot that 5,500. The time to act in my opinion is  
now. We're going along also with what the BIA has  
suggested.

24 Thank you.

25 MS. LEONETTI: Thank you. Public

0045

1 Member Charlie Brower.

2 MR. BROWER: Oppose.

3 MS. LEONETTI: Thank you. Public

Member Rhonda Pitka.

4

MS. PITKA: I oppose as justified by  
5 the Forest Service and the BIA. Thank you.

6 MS. LEONETTI: Thank you. And the Fish  
and Wildlife Service.

7

MS. KLEIN: The Fish and Wildlife  
8 Service supports deferral of the reduction of bulls for  
the reasons articulated by the BLM and also based on  
9 the recent action by this Board to eliminate the  
harvest of cows to address conservation concerns.

10

We also recognize the patchwork nature  
11 of Federal, State and corporation lands in the  
Northwest, Seward Peninsula and Arctic regions. We  
12 think that lends itself to the importance of a  
coordinated regulatory framework management actions and  
13 messaging and deferring it until the fisheries  
regulatory meeting in February 2027. It will still  
14 allow the Board to take these up before the next  
Federal wildlife cycle.

15

16 So we support.

16

MS. LEONETTI: Thank you. Chair Tony  
17 Christianson.

18 CHAIRMAN CHRISTIANSON: I support based  
on what Fish and Wildlife just stated for the record.

19

MS. LEONETTI: Okay. Mr. Chair, the  
20 motion -- the amended -- the amendment to the main  
motion passes 6-4.

21

CHAIRMAN CHRISTIANSON: You mean I had  
22 to break a tie?

23 MS. LEONETTI: You did.

24 CHAIRMAN CHRISTIANSON: That was a  
tough one. All right. We'll go back to the main  
25 motion that's been amended to vote on it. So can we

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1 get that main motion with the amended that we supported  
back on the record so we can pass that or to get it  
2 dealt with. Thank you.

3 So what we did was we deferred the  
second two possible amendments. What we have to do,  
4 like you said, Crystal, is we need to restate what the  
original motion is, what the amendment that we voted up  
5 to make it a 15 bull only hunt.

6 MS. LEONETTI: Okay. So the main  
motion was to adopt Wildlife Special Action 26-01. The  
7 amendments to the main motion include elimination of  
cow harvest across the units described through the  
8 2027-2028 regulatory year, but not to limit the bull  
harvest, but for the Board to take that up in the  
9 February meeting.

10 I think asking for any more discussion  
at this point, Mr. Chair, and then going from there.

11

CHAIRMAN CHRISTIANSON: Yep, that's  
12 where we're at. Any other discussion based on the  
motion to defer we just passed for the other intent of  
13 this regulatory meeting. We're back to the main  
motion. The floor is open if any other Board  
14 discussion or deliberation needs to occur. This is  
your opportunity.

15

(No comments)

16

CHAIRMAN CHRISTIANSON: Hearing none.  
17 We'll go ahead and do roll call on the original motion.

18 MS. JOHN: Hello. This is Jolene.  
Sorry, Mr. Chairman.

19

CHAIRMAN CHRISTIANSON: You have the  
20 floor.

21 MS. JOHN: Is this the time where they  
would have also made a motion regarding the users that  
22 were to be affected?

23 MR. STRIKER: So that would have been  
necessary if we didn't delay. There's no restriction  
24 on bag limit now, so it becomes kind of moot.

25 CHAIRMAN CHRISTIANSON: Basically all

0047

1 we're doing is taking the cow out of this.

2 MS. LEONETTI: Lisa Doehl.

3 MS. DOEHL: Thank you. Yeah, so as I  
4 understand it the Board just voted on a potential  
5 amendment and they voted to amend the main motion to  
6 basically defer consideration of whether to make any  
7 changes whatsoever to the bull harvest. And then the  
8 previous amendment was to amend the main motion to  
9 eliminate the cow harvest.

10 I would remind the Board these are  
11 Special Actions or this is WSA26-01 Special Action  
12 Request. So it's for a Temporary Special Action. But  
13 I guess the vote will -- the issue before the Board is  
14 for WSA26-01 is whether to eliminate the cow harvest  
15 through the '27-'28 regulatory year and to defer a  
16 decision on whether to make any changes to the existing  
17 regulations on the bull harvest limits that are already  
18 in place until the February fisheries regulatory  
19 meeting. I think Ciisquq just did a good job of  
20 writing it up.

21 MS. LEONETTI: Justin is doing that and  
22 he's doing an awesome job. Thank you, Justin.

23 MR. KOLLER: My pleasure.

24 MS. DOEHL: I mean the Board could  
25 always -- if someone wanted to make a motion to do an  
26 amendment, that is still possible before the vote on  
27 the motion, but otherwise this is my understanding of  
28 what it is. Again, Board Members can change it.

29 MR. BROWER: Mr. Chair.

30 CHAIRMAN CHRISTIANSON: Charlie, you  
31 have the floor.

32 MR. BROWER: Oh, sorry. So I have the  
33 same concern as BIA Jolene on the future for female.  
34 We're in this motion or is there another motion or a  
35 special action that would -- or amendment or a motion  
36 to see who is qualified on the cow users?

37 CHAIRMAN CHRISTIANSON: Yeah, Charlie,  
38 to answer your question we're not touching any of the  
39 user groups that have access. The only thing we're

0048  
40 doing is eliminating the cow hunt if we accept the  
41 motion as amended and not teasing out any user group.  
42 That all user groups would have to hunt bulls only in  
43 the units described in the analysis.

44 MR. STRIKER: So, Mr. Chair -- Don  
45 Striker, Park Service. As I'm sitting here thinking, I

5 think maybe Charlie and Jolene are right. We need  
another motion to amend, to clarify, that the closure  
to cows is for all users.

6

MR. PENDERGAST: Mr. Chair.

7

CHAIRMAN CHRISTIANSON: Yes, go ahead.

8

9 MR. PENDERGAST: Noted what you said,  
Don. This is Kevin with BLM. I'll be very careful  
with my words and try not to confuse a pretty complex  
10 motion here. The original special action request has  
been modified in a few ways. The original action was  
11 not specific to user groups and we have not changed  
that aspect of it. So I think it's clear the only  
12 thing that is on the table is closure to cow harvest  
and extension of this through the '27-'28 regulatory  
13 year and deferring action on bull harvest until  
February. So I don't see any need to go into talking  
14 more about user groups unless I'm missing something.

15 MS. DOEHL: Mr. Chair.

16 CHAIRMAN CHRISTIANSON: Lisa.

17 MS. DOEHL: This is Lisa Doehl,  
attorney. I hear what folks are saying. I think there  
18 seems to be some confusion, so I think it would be good  
to have some clarification as to the amendment to  
19 eliminate the cow harvest. Was it just for Federally-  
qualified users or was it for both Federally-qualified  
20 and non-Federally qualified users? Because in terms of  
the original motion -- I'm not sure that was clear to  
21 everyone as well the way it was addressed in OSM  
proposal was that it -- the original motion was a  
22 restriction on Federally-qualified users but would not  
restrict non-Federally qualified users.

23

24 It sounds like some folks are unclear  
and I think when there's a final decision it might  
benefit from having clarity for everyone whom others  
25 might be unclear.

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1 MR. BROWER: Thank you.

2 CHAIRMAN CHRISTIANSON: I think if we do  
pass this, you know, and it says a bulls only hunt for  
3 all users, that's pretty clear you can't shoot a cow.  
Thank you. Any questions from the Board for the Staff  
4 on this proposal?

5 MS. LEONETTI: Right. Mr. Chair, this  
is Crystal Leonetti, Director OSM. I am going to -- I  
6 think to make it hopefully helpful to everyone. So the  
State issued an emergency order to eliminate cow  
7 harvest for the rest of the regulatory year until

8 they're able to take it up again in the January Board  
of Game meeting. That essentially takes care of  
9 non-Federally qualified users.

10 And then if this motion passes, it  
eliminates the cow harvest on Federally-managed lands  
of these units. So then it essentially takes care of  
11 everyone until that January Board of Game meeting.

12 If you're okay, Mr. Chair, if Aaron  
Poetter is still on or Ben Mulligan -- just to make  
13 sure that I'm stating that correctly or state it more  
clearly than I did. That would be helpful.

14  
15 MR. POETTER: Yeah. Through the Chair,  
Aaron Poetter for the record. Those statements are  
accurate. Our non-residents are -- may only harvest  
16 bulls in any non-resident opportunities and the EO that  
we just issued did eliminate the harvest of the cows  
17 from our State hunts for Unit 22, 23 and 26A.

18 So your action would eliminate the cow  
harvest for the remainder or on Federal public lands  
19 consistent with what we put forward. So, yes, that  
would close up all the opportunities for the harvest of  
20 cows.

21 Thank you.

22 CHAIRMAN CHRISTIANSON: Any other Board  
questions, comments, deliberation. The floor is open  
23 for Board action if there's need.

24 (No comments)

25 CHAIRMAN CHRISTIANSON: Again, hearing

0050

1 none. Back to the original motion as read into the  
record with the amendment with the idea that we'll be  
2 picking this up here this later winter, early spring,  
which gives us an opportunity to let the State do their  
3 thing.

4 We've heard from a lot of experts  
across a lot of Regional Advisory Council meetings also  
5 about if we want to help this herd, we've got to give  
those caribou time to make some babies. So I'm in  
6 support of this action based off of just what they  
could do for the herd's potential.

7  
8 Roll call, please.

9 MS. LEONETTI: Okay. So the amended  
main motion would be that the Board -- it's to adopt  
Special Action Request WSA26-01 with a modification to  
10 eliminate cow harvest through the 2027-2028 regulatory  
year and keep the current bull harvest limits in place  
11 deferring the bull harvest reductions, restrictions

12 until the February fisheries regulatory meeting. I  
13 will start with BLM.

14 MR. PENDERGAST: BLM supports.

15 MS. LEONETTI: Thank you. National  
16 Park Service.

17 MR. STRIKER: Park Service supports.

18 This is the right combination in our opinion. We take  
19 the most impactful conservation effort in concert with  
20 the State. I think as we move forward on the  
21 conservation actions that we're going to need to be  
22 taking it's terribly important that we not  
23 over-complicate this for this user community that's  
24 going to be impacted. This gives us the time to try to  
25 make sure that we stay aligned and that we do our  
26 messaging together.

27 Thank you.

28 MS. LEONETTI: Thank you. U.S. Forest  
29 Service.

30

31 MR. RISDAHL: Well, I still believe  
32 that we should be acting more quickly, but in light of  
33 the way the Council -- or the way the Board is going,  
34 we will support it as well. As you know, we are not

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1 deferring to the Councils here and this is their --  
2 this is their proposal. They're the most concerned.  
3 Those are the folks that are going to be affected by  
4 this. They're the most concerned about the  
5 conservation of this herd and I feel that we may be  
6 making the decision based on something different. I'm  
7 not necessarily supportive of that, but in this case,  
8 as I said, I will support this amendment on the main  
9 motion.

10 Thank you.

11 MS. LEONETTI: Thank you. Public  
12 Member Charlie Brower.

13

14 MR. BROWER: I support as put in by the  
15 North Slope Regional Advisory Council and I support.

16 MS. LEONETTI: Thank you. Public  
17 Member Rhonda Pitka.

18

19 MS. PITKA: I support the motion but  
20 I'm also concerned that the conservation efforts will  
21 not be enough and will be too little too late. That's  
22 why I voted the way that I did earlier. I do support  
23 this though, thank you.

24

25 MS. LEONETTI: Thank you. Fish and  
26 Wildlife Service.

27

16 MS. KLEIN: We support the motion as  
17 amended and, yeah, just want to acknowledge the  
18 conservation concerns, you know, we're still hearing  
19 from some of our other Board Members and in response to  
20 the requests from the Regional Advisory Councils, their  
21 acknowledgement of this conservation concern but we do  
22 feel positive about the step we're taking for  
23 conservation by eliminating the harvest of cows. And  
24 also wanted to acknowledge with respect to the deferral  
25 and just the comments by Western Interior Regional  
0052 Advisory Council and even though they took no action,  
just wanted to acknowledge their comments with respect  
to trying not to have disparities between State and  
Federal users and just acknowledging the dual  
management situation that we're in. We support.

24 MS. LEONETTI: Thank you. BIA.

25 MS. JOHN: The BIA votes to adopt WSA-  
0052

1 01 with the amendments as stated by the Office of  
Subsistence Management. We feel it's pretty important  
2 that the eliminating the cow harvest is critical  
towards the conservation of this herd and that's how we  
3 vote.

4 Thank you.

5 MS. LEONETTI: Thank you. Public  
Member Ray Oney.

6  
7 MR. ONEY: Public Member Ray Oney moves  
to support the main motion as amended.

8 MS. LEONETTI: Thank you. Public  
Member Frank Woods.

9  
10 MR. WOODS: Public Member Woods  
supports with the concern that we might not be taking  
11 enough conservation efforts but I think with the time  
limit we have -- or not time limit, that the timing we  
12 have in February we'll be able to act on our own with  
the State's regulation changes.

13 Thank you.

14 MS. LEONETTI: Thank you. Chair Tony  
Christianson.

15  
16 CHAIRMAN CHRISTIANSON: I support as  
stated.

17 MS. LEONETTI: Thank you. Mr. Chair,  
the main motion as amended passes unanimously.

18  
19 CHAIRMAN CHRISTIANSON: I think that  
concludes the business for the day. Appreciate  
20 everybody walking through this one and making sure we  
get the record straight and patience in making sure we

21 have the process and all the discussion, justification  
and deliberation so thank you, again, for running the  
22 agenda. I came off the water but I couldn't -- I was  
out there bouncing around for 10 days so.....

23 MS. LAVINE: Mr. Chair.  
24 MR. PENDERGAST: Yeah, we have two more  
motions.

25  
0053  
1 MS. PITKA: Tony, we have two more  
motions.  
2  
CHAIRMAN CHRISTIANSON: See, I told you  
3 I got.....  
4 (Laughter)  
5 MR. STRIKER: Nice try.  
6 CHAIRMAN CHRISTIANSON: Good try, yep.  
7 We'll go back to the other motion and talk about it and  
discuss it, thank you. Could you read it for the  
8 record.

9 Robbin, or Crystal, can you read the  
next one into the record please.

10 MS. LAVINE: Yes, Mr. Chair. Next on  
the agenda is temporary Wildlife Special Action Request  
11 26-02.

12 MR. PLANK: Thank you, Robbin. Thank  
you, Mr. Chair. Again, apologize Mr. Chair that you  
13 have to endure me talking some more. This is Tom  
Plank, Wildlife Biologist with OSM. And I am joined by  
14 Hannah Voorhees, Anthropologist with OSM and we will be  
presenting a summary of analysis for temporary Wildlife  
15 Special Action, WSA26-02.

16 WSA26-02 was submitted by the Bering  
Landbridge National Preserve, which I will be calling  
17 BELA throughout the rest of this presentation, and it  
requests closing Federal public lands in Unit 22 to  
18 caribou hunting by non-Federally qualified users for  
the 2026 to 2028 regulatory cycle. The proponents  
19 submitted this special action due to the continued  
decline in the Western Arctic Caribou Herd and the  
20 Western Arctic Caribou Herd Working Group assigned a  
manage level to critical declining. Additionally, the  
21 Working Group proposed a total moratorium on hunting  
Western Arctic Caribou Herd if the population falls  
22 below 75,000 animals with hunting only to resume when  
the population again reaches 100,000 caribou. The  
23 proponent states that at the current rate of decline  
approximately 10 percent per year, the herd will drop  
24 below 100,000 by 2027. The proponent commented that  
most of the Unit 22 and a small part of Unit 23 on the

25 Seward Peninsula are considered the winter range of the  
0054

1 Western Arctic Caribou Herd, although collared animals  
2 from the herd have not made use of the Seward Penn for  
3 six years now, some remnant groups of Western Arctic  
4 Caribou Herd have been observed there, particularly  
5 around BELA. The portion of Unit 23 that coincides  
6 with the southeastern portion of BELA is already closed  
7 to caribou hunting by non-Federally-qualified users,  
8 August 1st to October 31st. The dates of the closure  
9 in Unit 23 are tied to a specific user conflict issue  
10 that are not necessary for Unit 22. The proponent  
11 believes that the action is necessary for the  
12 continuation of subsistence uses of the Western Arctic  
13 Caribou Herd by Federally-qualified subsistence users  
14 in Unit 22 and is consistent with the existing closures  
15 to non-Federally-qualified users in Unit 23.

16 Further restrictions on caribou harvest  
17 under both State and Federal management systems are  
18 expected in response to the continued decline in the  
19 Western Arctic Caribou Herd. The State Board of Game  
20 will next take up State hunting regulations for this  
21 region under its regular cycle in 2027 and the Federal  
22 Subsistence Board is scheduled to take up Federal  
23 hunting regulations in 2028 and BELA Staff intends to  
24 submit a similar closure proposal for that cycle.

25 And we've already gone over the  
regulatory history and the biology and the harvest for  
the Western Arctic Caribou Herd so I will not go over  
that again. If you have questions feel free to ask.  
And for the next section I will turn it over to Hannah  
Voorhees.

MS. VOORHEES: Thank you, Tom. Next  
I'll give a brief summary of the public hearing  
pertaining to WSA26-02 but also WSA26-03 so I'll read  
this here and I won't repeat it in the next  
presentation.

Earlier a public hearing was held on  
April 9th, 2026 by teleconference for all three special  
actions.

Four callers were in support of WSA26-  
02 and six were opposed. For WSA26-03 three callers  
expressed their support and six were opposed.

Those in support of the closures were  
from the region. Those in opposition included air

0055  
1 transporters, a representative of ADF&G, non-local

residents and a leader of a sport hunting group.

2

3 Callers in support of the closure said  
4 that such measures -- closures -- said that such  
5 measures are justified because the herd is in critical  
6 declining status and emphasized that Federally-  
7 qualified subsistence users have already taken a  
8 substantial reduction to their harvest limit.

9 Speakers in opposition to these two  
10 special actions argue that non-Federally-qualified  
11 users took a very small number of bulls and argue that  
12 they are not contributing to the herd's decline. They  
13 thought that fine-tuning harvest could better be  
14 managed by the Board of Game. Those in opposition also  
15 emphasized the negative impacts on transport and  
16 guiding incomes and hunters long planned trips if these  
17 closures go into place. They favor limiting cow  
18 harvest over closing to non-Federally-qualified users.

11

And I'll turn it back over to Tom.

12

13 MR. PLANK: Thank you, Hannah. So the  
14 next part is we had several alternatives that we did  
15 consider for this if the Board would like to consider.

14

15 One alternative considered was to  
16 implement a population threshold similar to the Unit 23  
17 closure. Specifically the Federal public lands would  
18 be closed to the caribou hunting except by Federally-  
19 qualified subsistence users unless the Western Arctic  
20 Caribou Herd population exceeds 200,000 caribou,  
21 however, since this closure would only be implemented  
22 for two years and the Western Arctic Caribou Herd  
23 population will not rebound to 200,000 caribou in that  
24 time period, this alternative was not considered  
25 further.

20

21 Another alternative considered is to  
22 limit the time period of the closure, similar to the  
23 existing closure in Unit 23 and that is from August 1st  
24 to October 31st.

23

24 Another alternative considered is to  
25 limit the closure of Federal lands in Unit 22 to the  
26 northern Seward Peninsula, specifically Units 22B  
27 through 22E and to exclude 22A from the closure. The  
28 Western Arctic Caribou Herd have not frequent the

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1 middle or southern portion of Unit 22A since at least  
2 2009 and remaining resident herds are not reported to  
3 occur in Unit 22A.

3

If Temporary Wildlife Special Action,

4 WSA26-02 is approved, Federal public lands in Unit 22  
5 will be closed to the harvest of caribou by non-  
6 Federally qualified users for the 2026 through 2028  
7 regulatory cycle. Only Federally-qualified subsistence  
8 users, those with a customary and traditional use  
9 determination for caribou in Unit 22 would be allowed  
10 to harvest caribou on Federal public lands in Unit 22  
11 as calf harvest is permitted in Unit 22 under State  
12 regulations but prohibited under Federal regulations.  
13 Approving WSA26-02 would also eliminate the calf  
14 harvest on Federal public lands. This may increase  
15 hunting pressure on State or privately owned lands.  
16 State managed lands comprise of about 56 percent of  
17 Unit 22 and also encompass many of the villages in the  
18 unit. If this request is adopted, user conflict and  
19 concerns about the affects of non-local users may  
20 increase on State managed lands. If this special  
21 action request is approved those with history of  
22 residency and family connections to Unit 22 who are now  
23 residing in non-rural areas would not be able to  
24 harvest caribou on Federal public lands in Unit 22 as  
25 they are not Federally-qualified subsistence users.  
Non-Federally-qualified subsistence users who are  
Native corporation shareholders would still be able to  
hunt on Native corporation lands under State  
regulations if permission is granted by the land owner.

17 Harvest by non-Federally-qualified  
18 subsistence users on Federal public lands would  
19 decrease. Non-Federally-qualified subsistence users  
20 would still be able to access and harvest caribou on  
21 the gravel bars above the mean high water mark within  
22 Federal public lands as they are considered State  
23 lands.

21 So the OSM's conclusion is to support  
22 Temporary Wildlife Special Action, WSA26-02. ANILCA  
23 Title VIII requires that the Federal land managers give  
24 subsistence use of fish and wildlife priority over  
25 other consumptive uses. ANILCA .815(3) stipulates that  
restrictions on non-subsistence uses are authorized, if  
necessary, for conservation of healthy population of  
fish and wildlife or to continue subsistence use of  
wildlife population. OSM considers this closure

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1 necessary for both of these reasons as outlined.

2 OSM supports measures to reduce  
3 conservation concerns for the Western Arctic Caribou  
4 Herd and as we've already talked over, in length here,  
5 especially considering the lengthy and precipitous  
decline of the caribou, and OSM considers closure to  
non-subsistence uses as necessary for the conservation  
of healthy caribou populations and furthermore many

6 subsistence users have expressed concerns over food  
7 security and ability to meet their subsistence needs if  
8 harvest limits are reduced, indicating that need for  
9 closure to continue -- indicating the need for closure  
10 to continue subsistence uses. And OSM does recognize  
11 that the radiocollared Western Arctic Caribou Herd cows  
12 and the bulk of the Western Arctic Caribou Herd have  
13 not migrated to the Seward Peninsula since 2019,  
14 however, caribou still occur on the Seward Peninsula  
15 and caribou harvest in Unit 22 is still managed as part  
16 of the Western Arctic Caribou Herd.

11

12 Thank you, Mr. Chair. Members of the  
13 Board. We'd be happy to answer any questions you all  
14 may have.

13

14 CHAIRMAN CHRISTIANSON: Any questions  
15 for Staff on this analysis.

15 (No comments)

16 CHAIRMAN CHRISTIANSON: And I like your  
17 voice.

17

(Laughter)

18

19 CHAIRMAN CHRISTIANSON: Hearing no  
20 questions for this, next agenda item, please, Robbin.

21 MS. LAVINE: Next on the agenda are  
22 Regional Advisory Council recommendations -- oh,  
23 actually next on the agenda we have summary of tribal  
24 and ANCSA Corporation consultations.

22

23 MR. LIND: Thank you, Robbin. Mr.  
24 Chair. Board Members. There were no consultations on  
25 this 26-02. Thank you.

24

25 MS. LAVINE: Thank you, Mr. Chair.  
0058 Members of the Board. Next on the agenda are the

1 Regional Advisory Council recommendations.

2 Nissa.

3 MS. PILCHER: This is Nissa Pilcher  
4 once again reading the Yukon-Kuskokwim Delta Regional  
5 Advisory Council for WSA26-02. Defer to the home  
6 region as well as Western Interior Regional Advisory  
7 Council.

8 The Northwest Arctic Regional Advisory  
9 Council voted unanimously to support WSA26-02 and I do  
10 reference Vice Chair Pattee's earlier testimony on  
11 that.

8

Thank you.

9

MS. LAVINE: Gisela.

10

MS. CHAPA: Good afternoon, Gisela Chapa for the record, I'm the Council Coordinator for the Seward Peninsula and the North Slope Regional Advisory Councils.

12

And the Seward Peninsula Council supports WSA26-02 because of the substantial conservation concerns of the Western Arctic Caribou Herd and acknowledged that while it will be an adjustment for some it will be beneficial in the long run.

13

The North Slope Regional Advisory Council also supports WSA26-02. The Council believes it is important to provide a subsistence priority and support subsistence users in Unit 22 due to the decline of the Western Arctic Caribou Herd.

14

Thank you.

15

MS. LAVINE: Thank you, Gisela. Next on the record is the Alaska Department of Fish and Game, liaisons to the Board.

16

MR. POETTER: Yeah, thank you. For the record, Aaron Poetter with the Alaska Department of Fish and Game.

17

As mentioned previously we don't have a whole lot more to provide to this special action

0059

request. The Department is -- the State is opposed to restriction of Federal public lands to Federally-qualified users only. As stated in the analysis, 95 percent of the harvest is conducted by Federally-qualified users already so the vast majority of harvest is coming from local users, those who are not Federally-qualified or non-resident make up such a small portion of the harvest that success or failure of management actions that are taken for restoration of the herd will be dependent on Federally-qualified users as it is anyway.

1

So we don't feel that it is necessary to restrict Federal public lands due to the disparity of harvest.

2

Thank you. MS. LAVINE: Thank you. Mr. Chair, next on the agenda are advisory group comments. Eva.

3

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11

12 MS. PATTON: Thank you, Mr. Chair and  
13 Members of the Board. For the record, Eva Patton, the  
14 National Park Service Subsistence Program Manager and I  
15 will be reading the Cape Krusenstern Subsistence  
16 Resource Commission comments on this proposal.

17 So the Cape Krusenstern Subsistence  
18 Resource Commission was able to meet with quorum to  
19 make recommendations on this special action and they  
20 voted to support WSA26-02 in support of their fellow  
21 subsistence communities across the way in Unit 22 that  
22 depend on that small group of resident caribou that are  
23 in that area.

24 And that was the only SRC  
25 recommendation on this special action. Thank you, Mr.  
26 Chair.

27 MS. LAVINE: Thank you. Mr. Chair.  
28 Members of the Board. Next is the InterAgency Staff  
29 Committee recommendation which I will provide.

30 The Federal Subsistence Board considers  
31 key sections of ANILCA, Title VIII, before taking  
32 actions on proposals requesting closures or  
33 restrictions. Specifically, those sections of Title  
34 VIII pertaining to Council deference, which is Section  
35 .805(c) and those pertaining to limitations to closures  
0060  
1 or restrictions of subsistence and non-subsistence uses  
2 on Federal public lands in Sections .815(3) and  
3 .816(b). These three sections speak to the heart of  
4 Board authority and require a careful balance between  
5 the Federal priority, the continuation of subsistence  
6 uses, the necessary conservation of fish and wildlife  
7 and unnecessary restrictions.

8 Although the Western Arctic Caribou  
9 Herd Working Group was unable to provide a comment on  
10 WSA26-02, the WACH management plan states that closure  
11 to Federal public lands to non-qualified users may be  
12 necessary during times of critically declining  
13 population levels. Based on the most recent photo  
14 censuses conducted in 2025 the WACH is currently below  
15 the critical population threshold of 130,000. While  
16 the Unit 22 caribou are managed as part of the WACH  
17 there are unique aspects of the caribou occurring on  
18 the Seward Peninsula that are important to consider for  
19 26-02. Although collared WACH animals have not used  
20 the historic winter range in Unit 22 since 2019 small  
21 remnant groups continue to occur across the Seward  
22 Peninsula, including within the Bering Landbridge

13 National Preserve. These isolated groups are all that  
14 remain for local subsistence opportunity in the region  
15 where caribou are increasingly scarce. The population  
16 demographics of these remanent groups of caribou are  
17 unknown, thus, both cow and bull harvest could affect  
18 population vigor and productivity. Further, as noted  
19 in the analysis there is a lack of available data due  
20 to low harvest reporting by Alaska residents and non-  
21 residents since 2023 in Unit 22. Because of this lack  
22 of information potential biological impact from the  
23 WACH from harvest by non-Federally-qualified users are  
24 poorly understood. Given the absence of population  
25 demographic information including bull/cow ratios,  
0061 calf/cow ratios and percentage of calves for these  
1 small caribou groups in Unit 22, a cautious approach  
2 may be necessary to help protect the overall viability  
3 of the WACH and to ensure long-term subsistence  
4 opportunities can continue in the region.

22 Thank you, Mr. Chair.

23 And, Mr. Chair, upon completion of the  
24 ISC comments, now is the time for Board discussion with  
25 Council Chairs or representatives, the State liaison or  
0061 anyone else that you wish to ask questions of and have  
1 discussion with.

0061

1 Thank you.

2 CHAIRMAN CHRISTIANSON: Thank you,  
3 Robbin. Could you remind me where we are on the  
4 agenda, sorry.

5 MS. LAVINE: Now is the time for Board  
6 discussion and this is an opportunity generally to talk  
7 with the liaisons of the Board but you can also ask  
8 questions of Staff or people who have provided comments  
9 previously.

7 Thank you.

8 CHAIRMAN CHRISTIANSON: Thank you for  
9 that, Robbin. And as Robbin stated, this is our  
10 opportunity now to open up the floor for the Board with  
11 pointed questions, if not the floor is open for Board  
12 action.

11 MR. WOODS: Mr. Chair. Adopt WSA26-02,  
12 we already did that or do we need to adopt to bring it  
13 up to the table?

13 CHAIRMAN CHRISTIANSON: Yeah, this is  
14 our time now, this is WSA-02 so we're voting on a new,  
15 different action.

15 MR. STRIKER: Mr. Chair, if there's no  
16 other Board questions, the National Park Service moves  
17 to adopt Temporary Wildlife Special Action WSA26-02,  
closing Federal public lands in Unit 22 to caribou  
hunting by non-Federally-qualified users for the 2026

18 to 2028 regulatory cycle. And with a second I'll give  
a brief justification of why I intend to support this  
19 motion.

19

MR. WOODS: Second.

20

MR. STRIKER: Thank you. I think we  
21 just heard really, really carefully articulated  
explanations from both OSM and the ISC what their  
22 recommendations, that outline -- that the Board can  
take this action when necessary for the conservation of  
23 healthy population of fish and wildlife or to continue  
subsistence use of wildlife population.

24

The Park Service, I think, considers  
25 this closure necessary for both of those reasons as

0062

1 outlined so well by OSM and the ISC and I don't see the  
need to reiterate that explanation. I will call your  
2 attention, Board Members, to some of the additional  
things that Robbin brought up with the small residual  
3 herd that's left in the Seward Peninsula portion, you  
know, the main herd's not coming down here anymore but  
4 that leaves really, really, really low opportunity for  
the Federally-qualified rural subsistence users and we  
5 just think that's important to give this additional  
level of protection to that continued subsistence use.

6

Thank you.

7

MS. PITKA: Really quick for  
8 clarification, who seconded the motion?

9

MS. LEONETTI: Public Member Frank  
Woods, I believe.

10

MR. WOODS: Yeah, Public Member Woods.  
11 I was just going through process and how to -- moving  
this, I agree with all that was said.

12

CHAIRMAN CHRISTIANSON: Any further  
13 deliberation or discussion, this is your opportunity  
for the Board.

14

(No comments)

15

CHAIRMAN CHRISTIANSON: Hearing none,  
16 we'll call for roll call, please, Crystal.

17

MS. LEONETTI: Mr. Chair. Director OSM  
Crystal Leonetti, I just have a quick question, did  
18 Frank Woods finish his comment or question?

19

MR. WOODS: Yes, I got it answered, I

was just walking on process here, thank you.

20

MS. LEONETTI: Okay.

21

MR. PENDERGAST: Mr. Chair.

22

CHAIRMAN CHRISTIANSON: Yes, you have  
the floor.

23

24

MR. PENDERGAST: Yeah, I apologize, I  
couldn't find my mute button fast enough. But Kevin  
Pendergast, BLM. Mr. Chair, I would like to make a

25

0063

1 motion to modify WSA26-02 to exclude BLM lands in Unit  
22 from the closure to non-Federally-qualified users.  
2 If I get a second I'll explain why I intend to support  
my motion.

3

MS. KLEIN: Fish and Wildlife seconds.

4

MR. PENDERGAST: Thank you. I also  
5 appreciate, you know, the articulate comments and the  
analysis Staff has done, you know, the concerns about  
6 the herd in general and before I walk into some kind of  
more detailed comments I just want to note that up  
7 front and also note that there's a pretty good BLM land  
footprint in Unit 22 in particular and I also feel like  
8 this Board is just taking strong action, you know, in  
support of the herd by eliminating cow harvest, which  
9 we all -- I think general consensus is that, like  
that's kind of the first strongest action we can take.

10

So I do recognize that the Western  
11 Arctic Caribou Herd population is at that critical  
level as we've heard and that residents of Unit 22  
12 depend on caribou for subsistence uses, however, the  
data before us does not support closing BLM lands in  
13 Unit 22 to the harvest of caribou by non-Federally-  
qualified users and because there's so much BLM lands  
14 in that area, I know people may be concerned about  
confusion but I think given the patchwork of lands  
15 across the area and the size of the lands in question,  
it's pretty approachable. Data shows, as I mentioned  
16 before that there's a harvestable surplus of bulls and  
that the low harvest levels in Unit 22 have not been  
17 significantly contributing to conservation concerns.  
The data shows that the bull/cow ratio has been high in  
18 2024. As we heard there were 44 bulls to every 100  
cows which is well above management plan objectives of  
19 30 to 100, again, suggesting there's a harvestable  
surplus of bulls.

20

21 Now, that doesn't remove all concern  
for the herd but we've taken some strong action and we  
should see how that bears out.

22

23 Meanwhile data also suggests that the  
harvest levels have accounted for just five percent --  
24 sorry, non-Federally-qualified user harvest levels have  
accounted for just five percent of the total harvest  
throughout the range and very low numbers in Unit 22  
25 specifically, extrapolating the available harvest

0064

1 report data, for instance, from 2016 to 2020, suggests  
that non-Federally-qualified users harvested an  
2 estimated 19 caribou a year in Units 22 Delta and Bravo  
during those years. In comparison community  
3 subsistence surveys, from 1998 to 2017 suggests that  
residents of Unit 22 harvested over 200 per community  
4 per year. So, you know, comparing that 19 for non-  
Federally-qualified users to the hundreds mark is just  
5 not persuasive for me to want to close these lands to  
non-Federally-qualified users.

6

7 And, again, I'll note the Board of Game  
and this Board just eliminated cow harvest, this should  
8 be expected to have a sizeable impact on herd recovery  
more than potentially any other action that we can  
take. Meanwhile, residents are limited to one bull  
9 caribou in Unit 22. I'll also note that Fish and Game  
and Park Service have started a study, my understanding  
10 is, recently, on caribou in Unit 22, I look forward to  
more insights gained from that. In the meantime for  
11 reasons I've expressed, I just can't support, you know,  
a broad base closure across the entire unit, so, again,  
12 looking for that amendment to exclude BLM lands from  
this closure.

13

Thank you.

14

15 CHAIRMAN CHRISTIANSON: So now we have  
on the floor a motion with a second to amend the  
original motion to exclude BLM lands in that Unit 22 so  
16 is there any further Board discussion or deliberation  
before we vote on this motion.

17

MR. WOODS: Public Member Woods here.

18

19 CHAIRMAN CHRISTIANSON: You have the  
floor.

20

21 MR. WOODS: Well, listening to BLM and  
I understand their concern but with the information I  
got is it's below the threshold for sustainability of

130,000 and the conservation impacts and the closure  
22 are connected to whether or not harvest limits are  
restricted, OSM and all the RACs and all the  
23 recommended -- we do the opposite -- that we take  
action to restrict non-qualified subsistence users  
24 since there's very little -- have very little impact on  
conservation concern, I get that.

25  
0065

1                   Number 1, it looks like a lot of State  
land around there, which, you know, gives the  
2 opportunity for non-qualified subsistence users to come  
in and harvest on State land and also corporation land,  
3 is that -- I think I heard that at the beginning of  
OSM's comments and Staff analysis.

4  
5                   For me, I'm going to be voting no on  
the amendment because I think as a herd, just like the  
Mulchatna Herd in my range, it impacts a lot of  
6 different things because that range now is bigger than  
we can actually manage and we're not managing the  
7 resource we're managing the harvest on people and just  
satisfy the subsistence use, I think -- I understand  
8 BLM's concern and U.S. Fish and Wildlife has a little  
portion of land but I think the more we look at this  
9 the populations are decreasing and we're in preserve  
and I agree with -- we took action on doing cow --  
10 elimination of cow hunts and I appreciate -- while I  
appreciate the amendment but for me I look at the whole  
11 -- I'm looking at the map now and it's pretty  
extensive, there's a lot of State land that wouldn't  
12 impact none of the non-qualified subsistence users  
access to resource.

13  
14                   So thank you.

15                   CHAIRMAN CHRISTIANSON: Any other  
further Board discussion, comments, deliberation.  
16                   MS. LEONETTI: Lisa Doehl has her hand  
up and then Greg Risdahl.

17                   CHAIRMAN CHRISTIANSON: Lisa.

18                   MS. DOEHL: Thank you. Through the  
19 Chair, first maybe I missed it, but was there a second  
on that motion?

20                   MS. LEONETTI: To the amendment, yes.

21                   MS. DOEHL: Yes, okay. Sorry, I must  
22 have missed it. And then I don't think I need to say

23 it because you guys just went through it on the last  
proposal but this -- it should follow the same process,  
24 in other words, voting on the motion to amend the main  
motion with this amendment. But looks -- yeah.

25 MS. LEONETTI: Greg Risdahl you have  
0066  
1 your hand up.

2 MR. RISDAHL: Yeah, thank you. I am  
not going to vote in support of this amendment and I am  
3 not going to vote in support because of the reasons  
already stated on the main motion that were given in  
4 the OSM analysis and by the ISC comment. I also  
believe that leaving the BLM lands open will be far  
5 more confusing to Federally-qualified users. If you  
have closed lands on some Federal lands and open lands  
6 on others. And I also feel that the Board has not done  
enough to preserve the subsistence priority today. I  
7 think we're putting it off once again so I'll be voting  
no on this amendment.

8  
Thank you.

9  
CHAIRMAN CHRISTIANSON: Any other Board  
10 comments, deliberation. This is on the amendment, we  
still have another run on this one so roll call please,  
11 hearing none.

12 Roll call.

13 MS. LEONETTI: Okay. I'm going to read  
the amendment, this vote is on the amendment to the  
14 main motion, which is to exclude BLM lands. The main  
motion is to close public -- Federal public lands in  
15 Unit 22 to caribou hunting by non-Federally qualified  
users for the 2026 to 2028 regulatory cycle, the  
16 amendment that we're voting on now is to exclude BLM  
lands.

17  
So I'll start with Public Member Frank  
18 Woods.

19 MR. WOODS: Public Member Frank Woods  
votes no,

20  
MS. LEONETTI: Thank you. BLM Member  
21 Pendergast.

22 MR. PENDERGAST: BLM supports for  
reasons already stated.

23  
MS. LEONETTI: Park Service opposes.  
24 This is a creative idea, I would just have to give more  
though to further fracturing the rules for people on  
25 the ground with individual Bureau sort of ownership of  
0067

1 Federal lands at this point.  
2 Thank you.  
3 MS. LEONETTI: Thank you. U.S. Forest  
4 Service.

5 MR. RISDAHL: Forest Service opposes  
6 the amendment.

7 MS. LEONETTI: Thank you. Public  
8 Member Charlie Brower.

9 MR. BROWER: Oppose.

10 MS. LEONETTI: Thank you. Public  
11 Member Rhonda Pitka.

12 MS. PITKA: Oppose, thank you.

13 MS. LEONETTI: Thank you. Fish and  
14 Wildlife Service.

15 MS. KLEIN: I think for the reasons  
16 mentioned by the Park Service we would oppose just  
17 because of, again, the kind of patchwork nature of the  
18 landscape in Unit 22 and thinking about what that might  
19 be, not really satisfactory to the subsistence or non-  
20 subsistence users in the area. And, yeah, so for those  
21 reasons I think we'll oppose.

22 MS. LEONETTI: Thank you. BIA.

23 MS. JOHN: BIA votes to oppose this  
24 amendment which would exclude BLM lands from this  
25 Federal closure.

26 MS. LEONETTI: Thank you. Public  
27 Member Ray Oney.

28 MR. ONEY: Public Member Ray Oney moves  
29 to oppose.

30 MS. LEONETTI: Thank you. And Chair  
31 Tony Christianson.

32 CHAIRMAN CHRISTIANSON: I oppose as  
33 stated.

34 MS. LEONETTI: Okay, Mr. Chair, the  
35 amendment fails.

36 CHAIRMAN CHRISTIANSON: Thank you.  
37 We're back to the original motion, any further  
38 discussion or deliberation on this motion. If hearing  
39 none we'll go ahead and move for Board action. This is  
40 your opportunity to speak to this motion.

5

(No comments)

6

CHAIRMAN CHRISTIANSON: Hearing or  
7 seeing none, roll call, please, Crystal. Thank you.

8 MS. LEONETTI: Thank you. The motion  
is to close Federal public lands in Unit 22 to caribou  
9 hunting by non-Federally-qualified users for the 2026  
to 2028 regulatory cycle.

10

I'll start with National Park Service.

11

MR. STRIKER: The Park Service supports  
12 for reasons already specified.

13 MS. LEONETTI: U.S. Forest Service.

14 MR. RISDAHL: The Forest Service also  
supports closing in Unit 22 for the reasons I already  
15 mentioned. Thank you.

16 MS. LEONETTI: Public Member Charlie  
Brower.

17

MR. BROWER: Support, North Slope  
18 Borough Regional Advisory Council and Northwest. Thank  
you.

19

MS. LEONETTI: Thank you. Public  
20 Member Rhonda Pitka.

21 MS. PITKA: I vote to support as  
articulated by the Park Service. Thank you.

22

MS. LEONETTI: U.S. Fish and Wildlife  
23 Service.

24 MS. KLEIN: We vote to support also as  
articulated by the National Park Service and in  
25 deference to the Councils who supported this and just

0069

1 with the acknowledgement that the Western Arctic  
Caribou Working Group management plan does say at this  
2 critical declining level that restrictions or closures  
may be necessary to non-Federally-qualified users.

3

MS. LEONETTI: BIA.

4

MS. JOHN: Yeah, the BIA votes to adopt  
5 WSA26-02. Such a closure is necessary to conserve the  
dwindling caribou population in this unit and to help  
6 subsistence users in the area's communities with their  
needs for this resource. This closure is supported by  
7 the available data as well as the knowledge of rural  
residents in the Seward Peninsula region. Our vote  
8 also gives deference to the recommendations of the

9 Seward Peninsula, the Northwest Arctic, and the North  
10 Slope Regional Advisory Councils on this special action  
11 request as well.

12 MS. LEONETTI: Public Member Ray Oney.

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

15 MS. LEONETTI: Public Member Frank  
16 Woods.

17 MR. WOODS: Public Member Woods votes  
18 to support.

19 MS. LEONETTI: Bureau of Land  
20 Management.

21 MR. PENDERGAST: BLM opposes for the  
22 reasons already stated. While we appreciate the  
23 concerns expressed and really thought about this, just  
24 don't see the information that supports a closure  
25 specifically as the appropriate tool at this time.

26 Thank you.

27 MS. LEONETTI: And Chair Tony  
28 Christianson.

29 CHAIRMAN CHRISTIANSON: I support the  
30 closure as stated.

31 MS. LEONETTI: Mr. Chair, the motion  
32 passes.

0070 CHAIRMAN CHRISTIANSON: Thank you.  
1 We'll move on to next on the agenda.

2 MS. LAVINE: Thank you, Mr. Chair.  
3 Next on the agenda is Wildlife Special Action Request,  
4 WSA26-03.

5 MR. PLANK: Thank you, Robbin. Thank  
6 you, Mr. Chair and Members of the Board. For the  
7 record Tom Plank, Wildlife Biologist, OSM with Hannah  
8 Voorhees, Anthropologist for OSM and we are presenting  
9 a summary of analysis for Temporary Wildlife Special  
10 Action, WSA26-03.

11 WSA26-03 was submitted by the North  
12 Slope Subsistence Regional Advisory Council and  
13 requests closing Federal public lands in Unit 26A  
14 southwest to caribou hunting by non-Federally-qualified  
15 users for the 2026 through 2028 regulatory cycle.

16 The proponents submitted this special

12 action due to the continued decline of the Western  
13 Arctic Caribou Herd and the Western Arctic Caribou Herd  
14 Working Group assigning the management level to  
15 critical declining and also in response to Wildlife  
16 Special Action Request, WSA26-01.

17 Because Wildlife Special Action WSA26-  
18 01 would greatly impact residents of the community of  
19 Wainwright, Point Lay and Point Hope, the North Slope  
20 Regional Advisory Council considers the closure of  
21 Federal public lands in the southwest portion of Unit  
22 26A to non-Federally-qualified users to be necessary  
23 for the continuation of subsistence uses of caribou.  
24 The Council also notes that non-Federally-qualified  
25 subsistence users frequently fly in to hunting sites  
26 located directly along the Western Arctic Caribou  
27 Herd's migratory pathways and believes that the closure  
28 will directly benefit the herd. The Council asserts  
29 that Federally-qualified subsistence users should not  
30 be the only users to take action to ensure the  
31 continued viability of this caribou herd and at the  
32 subsistence users should be given priority over the use  
33 of non-Federally-qualified users as stated in ANILCA.

34 I would like to reference the maps on  
35 Page 6 and 7 in considering this special action. We've  
36 already looked at these before so I'll just kind of  
37 briefly go over it again. The map on Page 6 shows the  
0071  
38 actual point locations of collared caribou by season  
39 since 2009 and the map on Page 7 is all location points  
40 for the last five years and they show that the Western  
41 Arctic Caribou Herd occupies Unit 26A southwest year-  
42 round and their calving grounds primarily occur in this  
43 area and portions of the insect relief in late summer  
44 use area have also historically occurred in Unit 26A  
45 southwest and the Western Arctic Caribou Herd have been  
46 increasing their winter use in Unit 26A southwest in  
47 recent years.

48 I will skip over the regulatory  
49 history, the harvest history. Hannah already addressed  
50 the cultural knowledge and traditional practices.

51 And the alternatives considered were  
52 the same alternatives that you already considered in  
53 WSA26-02 so for brevity of time, basically the --  
54 implement population threshold, implement a time period  
55 and so with those, if you have any questions feel free  
56 to ask but I'll go ahead and go directly to possible  
57 effects.

12

13                   If Temporary Wildlife Special Action,  
14 WSA26-03 is approved Federal public lands in Unit 26A  
15 southwest will be closed to the harvest of caribou by  
16 non-Federally-qualified users for the 2026 to 2028  
17 regulatory year. Only Federally-qualified subsistence  
18 users, those with a customary and traditional use  
19 determination for caribou in Unit 26A would be able to  
20 harvest caribou on Federal public lands in Unit 26A  
21 southwest. This may increase hunting pressure on State  
22 or privately owned lands. State managed lands comprise  
23 of about 30 percent of Unit 26A southwest and also  
24 encompasses many other villages in the unit. If this  
25 special action is approved user conflicts and concerns  
0072 about the affects of non-local hunters may increase on  
State managed lands. Additionally, those with a  
history of residency and family connections in Unit 26A  
who are now residing in non-rural areas would not be  
able to harvest caribou on Federal public lands in Unit  
26A southwest as they are not Federally-qualified  
subsistence users. Non-Federally-qualified users who  
are Native Corporation shareholders would still be able  
to hunt on Native Corporation lands under State  
regulation if permission is granted by the land owner.  
Harvest of non-Federally-qualified users on Federal  
public lands would decrease, non-Federally-qualified  
users would still be able to access and harvest caribou

1 on gravel bars below the mean high water mark within  
2 Federal public lands as they are considered State  
3 lands.

4                   So the OSM's conclusion is to support  
5 Temporary Wildlife Special Action, WSA26-03. Again,  
6 ANILCA Title VIII requires that Federal land managers  
7 give subsistence use of Federal fish and wildlife  
8 priority over other consumptive uses. ANILCA .815(3)  
9 stipulates that restrictions on non-subsistence use are  
10 authorized if necessary for the conservation of healthy  
11 population of fish and wildlife or to continue  
12 subsistence use of wildlife population. OSM considers  
13 this closure necessary for both of these reasons as  
outlined below.

1                   OSM supports measures to reduce  
2 conservation concerns for the Western Arctic Caribou  
3 Herd and, again, as we've all discussed due to the  
4 lengthy and precipitous decline of the Western Arctic  
5 Caribou Herd. With the continued decline of the  
6 caribou herd and the concurrent WSA26-01 request to  
7 reduce harvest limits for Federally-qualified  
8 subsistence users it is appropriate to also restrict  
9 non-subsistence use in Unit 26A southwest. OSM

14 considers closures to non-subsistence use as necessary  
15 for the conservation of healthy caribou populations and  
16 Unit 26A southwest is an important and frequently  
17 occupied part of the Western Arctic Caribou Herd range  
18 year-round. Furthermore, many subsistence users have  
19 expressed concerns over food security and ability to  
20 meet their subsistence needs if harvest limits are  
21 reduced indicating a need for closures to continue  
22 subsistence use.

18 Thank you, Mr. Chair. Members of the  
19 Board. Be happy to answer any questions you have.

20 CHAIRMAN CHRISTIANSON: Thank you. Any  
21 questions from the Board for Staff on this proposal.

22 (No comments)

23 CHAIRMAN CHRISTIANSON: Hearing none,  
24 next on the agenda Robbin.

25 MS. LAVINE: Next on the agenda are  
0073 Regional Advisory Council recommendations.

1 Nissa.

2 MS. PILCHER: Hello, everyone, this is  
3 Nissa Pilcher, Council Coordinator for the Northwest  
4 Arctic Regional Advisory Council. The Council did vote  
5 unanimously to support WSA26-30 [sic]. As Vice Chair  
6 Pattee read earlier, the Council believes that in order  
7 for the continuation of subsistence uses and for the  
8 conservation of the Western Arctic Caribou Herd that  
9 this closure is necessary. Thank you.

10 Oh, also the Yukon-Kuskokwim Delta  
11 Regional Advisory Council and the Western Interior  
12 Regional Advisory Council did not comment on this  
13 Special Action Request.

14 MS. LAVINE: Gisela.

15 MS. CHAPA: Good afternoon. Again,  
16 Gisela Chapa. I am the Council Coordinator for the  
17 North Slope Regional Advisory Council. This Council  
18 was the proponent of WSA26-03 and do not have Council  
19 recommendations and also Seward Peninsula did not  
20 consider WSA26-03.

21 MS. LAVINE: Thank you. Mr. Chair,  
22 Members of the Board, next on the agenda is the Alaska  
23 Department of Fish and Game comments. Aaron.

24 MR. POETTER: Thank you. Again, Aaron  
25 Poetter for the record. Again, the State of Alaska is

17 opposed to this Special Action Request to close Federal  
18 public lands in 26(A). We find it unnecessary as a  
19 management action in order to help the decline of this  
20 herd. The non-Federally-qualified harvest is minimal  
at best. There are bulls available for harvest in  
maintaining healthy management metrics of this herd.  
We don't feel it is necessary at this time.

20

Thank you.

21

22 MS. LAVINE: Thank you, Aaron. Mr.  
23 Chair, next on the agenda are advisory group comments.  
24 Eva.

25 MS. PATTON: Thank you, Mr. Chair and  
members of the Board. For the record, Eva Patton,  
National Park Service. We did not have any Subsistence  
0074

1 Regional Advisory Council comments on this proposal.  
It is outside of their region. Thank you, Mr. Chair.

2

3 MS. LAVINE: Thank you, Eva. Mr.  
4 Chair, Members of the Board, next in the queue is the  
InterAgency Staff Committee comment, which I will give.

4

5 The Federal Subsistence Board considers  
6 key sections of Title VIII before taking action on  
7 proposals or special actions requesting closures.  
8 Those are Sections .805(c), .815(3) and .816(b). These  
9 three sections speak to the heart of Board authority  
and require a careful balance between the Federal  
priority, the continuation of subsistence uses, the  
necessary conservation of subsistence fish and wildlife  
and unnecessary restrictions.

9

10 There are nuances in the available data  
11 on the Western Arctic Caribou Herd in Unit 26A  
12 southwest. Although the WACH working group was unable  
13 to provide a comment on Wildlife Special Action 26-03,  
14 the Western Arctic Caribou Herd Working Group  
15 Management Plan states that closure of Federal public  
16 lands to non-qualified users may be necessary for  
17 critical declining population levels.

18 Analysis for 26-01 and 26-03  
demonstrate that the lands in Unit 26A southwest are  
particularly important to the WACH and the residents  
who depend on caribou for subsistence. The WACH is  
generally present in Unit 26A throughout the year.  
Calving occurs in Unit 26A southwest and bulls  
typically summer there as well.

Residents of Wainwright and Point Lay  
rely on both edible and non-edible materials from

19 caribou to meet their subsistence needs. Estimates  
20 produced from subsistence surveys suggest that  
21 residents of Wainwright harvest more caribou from the  
22 WACH than most other communities. However, stated in  
23 the analysis for 26-01, harvest data from 26A is  
24 limited and recent harvest report data in 26A southwest  
25 is unavailable.

23 An extrapolation of harvest report data  
24 from other units suggest that prior to 2023 the  
25 non-Federally-qualified users harvest levels in Unit  
26A southwest were relatively low. In 2024, the Board  
0075 adopted a closure to the harvest of caribou by

1 non-Federally-qualified users in Unit 23, but it is  
2 unknown if this has affected non-Federally-qualified  
3 user harvest levels in 26A southwest, as well as in  
4 other units.

3 Thank you, Mr. Chair.

4  
5 Mr. Chair, with the completion of the  
6 InterAgency Staff Committee comments, now is the time  
7 for Board discussion with the State Liaison, the  
8 Chairs, and to call on Staff if they have any  
9 questions.

7 Thank you, Mr. Chair.

8  
9 CHAIRMAN CHRISTIANSON: Thank you,  
10 Robbin. Appreciate you running the agenda today. As  
11 she stated, this is our opportunity now for Board  
12 action on this Wildlife Special Action Request.

11 MR. PENDERGAST: Mr. Chair.

12 CHAIRMAN CHRISTIANSON: You have the  
13 floor.

13  
14 MR. PENDERGAST: Kevin Pendergast BLM  
15 making a motion based on our -- well, I guess we've got  
16 all the lands in this area. Mr. Chair, I would like  
17 to make a motion to defer WSA26-03 until the fisheries  
18 regulatory meeting coming up here in February 2027. If  
19 I get a second, I will explain why I intend to support  
20 my motion.

17 MR. STRIKER: Park Service seconds.

18  
19 MR. PENDERGAST: Thank you. A couple  
20 detailed notes and then I will make some general  
21 remarks. The available data again suggests that the  
22 primary cause of the herds' decline has been high cow  
23 mortality rates. We have taken decisive action today

21 to address that as an initial step. We should expect  
22 that this is one of the best steps we can take to help  
23 with herd recovery.

23 Coming up in January the Board and Game  
24 meets and they will be taking up further action with  
25 respect to this herd. And then in February we would  
0076 have the opportunity to act further. I want make it  
clear here, you know, we can still take action and we

1 have taken an initial step today. We will learn more.  
2 There's another photo census coming up. We should have  
3 that data by February and we'll know what the State has  
4 done at that time.

3

4 If warranted, we can take additional  
5 actions at that time, so I just don't see the need for  
6 the closure at this time. While fully respecting and  
7 appreciating the concerns already articulated by the  
8 RAC's, not discounting any of that, we may well act on  
9 those things just a little bit later.

7 So at this time my motion would be to  
8 go ahead and just defer this until February.

8

9 Thank you.

9

10 CHAIRMAN CHRISTIANSON: Board discussion  
11 and deliberation. Comments on this one.

11 MR. WOODS: The report, Mr. Chair.

12 CHAIRMAN CHRISTIANSON: Yes, Frank, you  
13 have the floor.

13

14 MR. WOODS: Yeah, in reading OSM's  
15 report and the alternative, the alternative waits for a  
16 population to go up to 200,000 to have thresholds.  
17 That isn't going to happen in the next two years it  
18 looks like or until the population rebounds and the  
19 action today helped with the cow hunt. It's already  
20 managed for the critical declining level of this  
21 caribou population. So I'm going to oppose the  
22 amendment just not only for the -- it's a numbers game  
23 for me.

19

20 I appreciate BLM wanting to defer and  
21 wait for the State to act on it, but I think we have  
22 action today that would restrict the minimal impact on  
23 non-Federally qualified subsistence users under Title  
24 VIII and the reasons not only for the local RAC  
25 committees that have proponents of this, but also the  
26 reasoning behind it is we need to do something for this  
27 season and that's why we're meeting today. So thank  
28 you.

23

24 MS. LAVINE: Mr. Risdahl has his hand

up.

25

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MR. RISDAHL: Thank you, Mr. Chair. I would also like to state that the Forest Service will be opposing the deferral of this for the same reasons that I had given essentially for WSA26-01.

3

4

I think we should be supporting the Councils and the entities that are the primary individuals who are taking this hit. I think this population needs all the help it can get at this point in time. We've waited a very long time to do something about it and I don't think we should be waiting any longer.

7

Thank you, Mr. Chair.

8

9

MR. PENDERGAST: Mr. Chair.

10

CHAIRMAN CHRISTIANSON: Yes.

11

MR. PENDERGAST: Since we are in discussion phase here. I definitely appreciate the comments of my colleagues on the Board. The reason we are seeking to defer is not to quote/unquote wait for the State to act. It's because we have taken strong action and there's kind of a measured approach here that I would like to see where we take an action, we learn some more, the State acts.

15

We have the opportunity to see what they did and get into alignment with that if we think that is the appropriate action. You know, just approaching it that way. That's the rationale here as opposed to kind of just throwing everything at it and the wondering what worked later. That's what informs my thinking around this. I just wanted to share that.

19

Thank you.

20

MR. STRIKER: Mr. Chair, Park Service here. I appreciate that comment. I'll be supportive of your motion. This is different than what we just did in Unit 22. My concern in 22 was that -- you know, 26 has a much larger population of Western Arctic Caribou Herd and the population is known there.

23

24

There's a photo census and it's incredibly important when we are taking actions like will be proposed in the fall that we are in alignment on messaging with the State. This is a complex thing

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1

out there on the landscape whenever we are talking

2 about additional actions and I think alignment really  
3 goes a long way to making sure that we are successful  
4 with whatever it is that we do do.

5

6 We don't just wave a magic wand and all  
7 of a sudden assume that everybody is going to be  
8 complying with whatever actions we do take. So I  
9 appreciate your measured and thoughtful approach to  
10 this suggestion.

11

12 CHAIRMAN CHRISTIANSON: Other Board  
13 comments or deliberation on this recommendation to  
14 defer.

15

16 (No comments)

17

18 CHAIRMAN CHRISTIANSON: Hearing none.  
19 Let's do roll call on the motion to defer this action.

20 MS. LEONETTI: So the motion on the  
21 floor is to defer Special Action Request 26-03. Start  
22 with Public Member Frank Woods.

23 MR. WOODS: Public Member Woods votes no  
24 for motion to defer.

25

26 MS. LEONETTI: Thank you. Public  
27 Member Ray Oney.

28 MR. ONEY: Public Member Ray Oney votes  
29 no to defer.

30

31 MS. LEONETTI: Thank you. Bureau of  
32 Indian Affairs.

33 MS. JOHN: I respectfully request to be  
34 delayed till the end.

35

36 MS. LEONETTI: Are you supporting the  
37 motion or.....

38 MS. JOHN: Can you call on me later,  
39 please.

40

41 MS. LEONETTI: Oh, I see. Thank you.  
42 Fish and Wildlife Service.

43 MS. KLEIN: We support to defer for the  
44 reasons articulated by both the BLM and the Park  
45 Service.

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1 reasons articulated by both the BLM and the Park  
2 Service.

3

4 MS. LEONETTI: Public Member Rhonda  
5 Pitka.

6 MS. PITKA: I vote to oppose the  
7 deferral.

8

6 MR. BROWER: Thank you. Public Member  
Charlie Brower.  
7 MR. BROWER: Oppose.  
8 MS. LEONETTI: U.S. Forest Service.  
9 MR. RISDAHL: Forest Service votes to  
oppose.  
10  
11 MS. LEONETTI: National Park Service.  
12 MR. STRIKER: Park Service supports  
motion to defer.  
13 MS. LEONETTI: Bureau of Land  
Management.  
14  
15 MR. PENDERGAST: I support for the  
reasons stated already.  
16 MS. LEONETTI: Bureau of Indian  
Affairs.  
17  
18 MS. JOHN: BIA opposes the motion to  
defer.  
19 MS. LEONETTI: Chair Tony Christianson.  
20 CHAIRMAN CHRISTIANSON: I oppose.  
21 MS. LEONETTI: Mr. CHAIRMAN, the motion  
fails, which means that another motion for the Special  
22 Action Request can be entertained.  
23 CHAIRMAN CHRISTIANSON: The table is  
open for Board action accepting motions for this  
24 Wildlife Special Action. So I'm entertaining somebody  
to support.  
25  
0080  
1 MR. PENDERGAST: Mr. Chairman.  
2 CHAIRMAN CHRISTIANSON: Yes.  
3 MR. PENDERGAST: BLM. Mr. Chairman,  
I'd like to make a motion to adopt WSA26-03. If I get  
4 a second, I will start the discussion by explaining why  
I intend to oppose my motion.  
5  
6 MR. BROWER: Second.  
7  
8 CHAIRMAN CHRISTIANSON: The motion has  
been made. Thank you, Kevin. You have the floor.  
9 MR. PENDERGAST: Okay. Thank you. I  
would like to be efficient here since we've been  
10 talking about the same herd for three Special Actions  
here and I don't want to keep repeating myself. I do  
11 acknowledge, again, that the Western Arctic Caribou  
Herd is at that critical level. Residents of 26 Alpha,  
particularly those of Wainwright and Point Lay, largely  
depend on caribou for subsistence uses.

12

13 I've heard firsthand many times from  
14 working with folks out there at the NPR-A how important  
15 caribou are and I fully understand that. However, the  
16 available data we've got, it just doesn't support a  
17 closure at this time to non-Federally qualified users.  
18 It might in the future. It just doesn't now.

19 Harvest report data is unavailable in  
20 this area, but our available data suggests that  
21 Federally-qualified users harvest significantly more  
22 caribou in 26 Alpha Southwest than non-Federally  
23 qualified users. Community subsistence surveys  
24 demonstrate that residents of Point Lay harvested an  
25 estimated 365 caribou. This is in 2012. And residents  
26 in Wainwright harvested 793 in 2023 as a couple of data  
27 points. Taken together you could average those to like  
28 575 caribou per year.

29

30 You know, the data is a little spotty,  
31 but roughly extrapolating available harvest report data  
32 in the analysis that we've got suggests that  
33 non-Federally qualified users on average harvested  
34 fewer than 40 in Units 22 Alpha, Charlie, and Echo,  
35 Unit 24 and Unit 26 Alpha.

36 Only a portion of this average of 40

0081

1 would have been harvested in 26 Alpha Southwest. So 40  
2 across multiple units. Just a subset of that in 26  
3 Alpha. At the same time available data does not  
4 suggest there is a user group conflict in 26 Alpha  
5 Southwest.

6 We've got a 2016 paper which is  
7 referencing an analysis that says the residents of 26  
8 harvested in the summer months in July and August when  
9 caribou are generally near the communities. On the  
10 other hand about 85 percent of non-Federally qualified  
11 users would be harvesting in August to early October.  
12 Most of those by plane.

13 Taken together it does not appear that  
14 there has been much conflict between residents in the  
15 area when harvesting -- with non-Federally qualified  
16 users -- when harvesting from this herd.  
17 So just given the data we've got, you know, and the  
18 other action we've already taken, we oppose at this  
19 time.

20

21 Thank you.  
22 CHAIRMAN CHRISTIANSON: Thank you,  
23 Kevin. Any other Board questions or deliberation,  
24 comments.

25

26 (No comments)  
27 CHAIRMAN CHRISTIANSON: Hearing or

28

17 seeing none, we will go ahead and call for a Board roll  
18 call on this Special Action.

18 MS. LEONETTI: The motion is to adopt  
19 Special Action Request 26-03. Sorry, I muted myself.  
20 I will start again. The motion is to adopt Wildlife  
21 Special Action 26-03, which is to close Federal public  
22 lands in Southwest portion of Unit 26A to caribou  
23 hunting by non-Federally qualified users for the  
24 2026-2028 regulatory cycle. I'll start with Public  
25 Member Charlie Brower.

22 MR. BROWER: Support.

23 MS. LEONETTI: Public Member Rhonda  
24 Pitka.

25 MS. PITKA: I support. Thank you.

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1

MS. LEONETTI: U.S. Fish and Wildlife  
2 Service.

3 MS. KLEIN: Hi. Sorry. This is Jill  
4 with Fish and Wildlife Service. I think we will  
5 support even though I understand the -- and support the  
6 comments raised by Member Pendergast, but I think it's  
7 also important to protect the herd across the various  
8 range -- units of the herd and of the range. So would  
9 support this.

7 Thank you.

8 MS. LEONETTI: Thank you. Bureau of  
9 Indian Affairs.

10 MS. JOHN: The BIA votes to adopt this  
11 Special Action in deference to the North Slope RAC.  
12 Prohibiting Federal land caribou under hunting under  
13 safe regulations in Unit 26A and provide additional  
14 protection for the caribou that these rural communities  
15 depend on.

13 The caribou is currently being managed  
14 at the critical declining level. It's important that  
15 we recommend restricting harvest to residents only.  
16 ANILCA Section .815-3 stipulates that restrictions on  
17 non-subsistence usage are authorized if necessary for  
18 the conservation of healthy population of fish and  
19 wildlife or to continue subsistence uses of wildlife  
20 populations.

17

18 Title VIII also requires that we give  
19 subsistence users a priority over others so, I feel  
20 that is appropriate to also limit non-subsistence  
21 hunting activities in Unit 26A. Our BIA vote on this  
22 Special Action Request is based on these reasons.

20

Quyana.

21

MS. LEONETTI: Thank you. Public

22 Member Ray Oney.

23

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

24

MS. LEONETTI: Thank you. Public

25 Member Frank Woods.

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1

MR. WOODS: Public Member Woods votes  
2 to support for all the reasons and deferring to the  
RAC.

3

MS. LEONETTI: Thank you. Bureau of  
4 Land Management.

5

MR. PENDERGAST: BLM opposes.

6

MS. LEONETTI: Thank you. National Park  
Service.

7

MR. STRIKER: Park Service opposes for  
8 the reasons laid out by Kevin. A closure is a big  
action and we have to have substantial evidence that's  
9 going to do something. Thank you.

10

MS. LEONETTI: Thank you. U.S. Forest  
Service.

11

MR. RISDAHL: U.S. Forest Service  
12 supports in deference to the RACs and for the reasons  
I've already given. Thank you.

13

MS. LEONETTI: Thank you. And Chairman  
14 Tony Christianson.

15

CHAIRMAN CHRISTIANSON: I support this  
16 and I'm glad for the support that we do have there to  
try to count the viability of the herd and the  
continuation of subsistence uses. You know, we look  
17 back historically giving the caribou opportunity to  
freely travel, looking at the hardships we see on the  
18 landscape and food security issues. Helping these  
rural communities along with the high cost of living  
19 that is sky rocketing. These are things that we can do  
to provide that opportunity for those and looking into  
20 the future that this herd can get back to a higher  
sustainable harvest level.

21

So for that I support this.

22

MS. LEONETTI: Thank you. Mr. Chairman,

23 the motion passes.

24 CHAIRMAN CHRISTIANSON: Thank you. I  
25 appreciate all the work today, you guys. You know, the  
0084 layered Special Action, but I appreciate all the work  
1 by the Board to get the record straight and  
justifications down.

2

I look forward to hoping this herd can  
3 get back to a very sustainable harvest level based on  
the Board action today and providing ample opportunity  
4 for subsistence users to get their needs met again in a  
changing landscape and economic hardship.

5

Thank you, Board Members, and I  
6 appreciate it. If there is a motion to adjourn, I will  
entertain.

7

MS. PITKA: This is Rhonda. I'll make  
8 the motion to adjourn.

9 MR. ONEY: Ray Oney second.

10 CHAIRMAN CHRISTIANSON: No opposition to  
adjourn. Have a good day, everybody. Enjoy the  
11 summer. It's coming in and we got sunshine out here in  
Juneau. So I'm going down to a celebration and hoo-hah  
12 it up with all the Tlingit relatives here.

13 (Off record)

14 (END OF PROCEEDINGS)

15

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1 C E R T I F I C A T E

2 UNITED STATES OF AMERICA )

) ss.

3 STATE OF ALASKA )

4 I, Salena A. Hile, Notary Public in and for the  
state of Alaska and reporter of Computer Matrix Court  
5 Reporters, LLC, do hereby certify:

6 THAT the foregoing is a full, true and correct  
Transcript of the FEDERAL SUBSISTENCE BOARD MEETING  
7 taken electronically by our firm on the 3rd day of June  
2026;

8

9            THAT the transcript is a true and correct  
10 transcript requested to be transcribed and thereafter  
11 transcribed by under my direction and reduced to print  
12 to the best of our knowledge and ability;

13            THAT I am not an employee, attorney, or party  
14 interested in any way in this action.

15

16            DATED at Anchorage, Alaska, this 14th day of  
17 June 2026.

18

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Salena A. Hile  
Notary Public, State of Alaska  
My Commission Expires: 09/16/26