

Emergency Wildlife Special Action Analysis

WSA26-06

ISSUE

Emergency Wildlife Special Action WSA26-06, submitted by Katmai National Park and Preserve (NPP), requests to increase the caribou harvest limit from one to “up to 2” caribou for the fall 2026 hunt in Unit 9C, within Katmai National Preserve (**Figure 1**). The proponent notes that authority to set harvest limits needs to be delegated to the Federal in-season manager for this change to be implemented.

Proponent Statement

The caribou population that currently occupies Katmai National Preserve is locally referred to as the Kukalek Shelf Caribou population. Since 2020, the National Park Service (NPS) and the Alaska Department of Fish and Game (ADF&G) have documented a significant expansion of the Kukalek Shelf caribou population from approximately 300 animals in 2020 to more than 1,200 in 2025. The most recent calf to cow (38:100) and bull to cow (45:100) ratios indicate a healthy and fast-growing population.

Local communities (Kokhanok and Igiugig), ADF&G, and the NPS agree that this caribou population’s growth and corresponding potential impacts to habitat are a concern. The State of Alaska is currently planning to open a winter registration hunt on this population in Unit 9C on lands adjacent to Katmai National Preserve with an “up to 2” caribou harvest limit with permits only available in local communities. ADF&G has also expressed intentions of submitting a Federal special action request to change the harvest limit within Katmai National Preserve to “up to 2” caribou by State registration permit for the winter 2026/27 hunt in order to align State and Federal regulations. Doing so would help coordinate hunt objectives for this population across jurisdictions. It would position State and Federal managers to better achieve their objectives of slowing the herd’s growth rate and maintaining a moderate density that has less potential to have detrimental impacts on habitat.

This in turn would help maintain this important subsistence resource in the region at sustainable levels and provide for harvest over the long term. Doing so would go a long way towards helping to address food security issues in remote communities throughout the region. Local community and Tribal representatives voiced their support for this harvest limit change for both the fall and winter hunts during recent meetings on herd and hunt management.

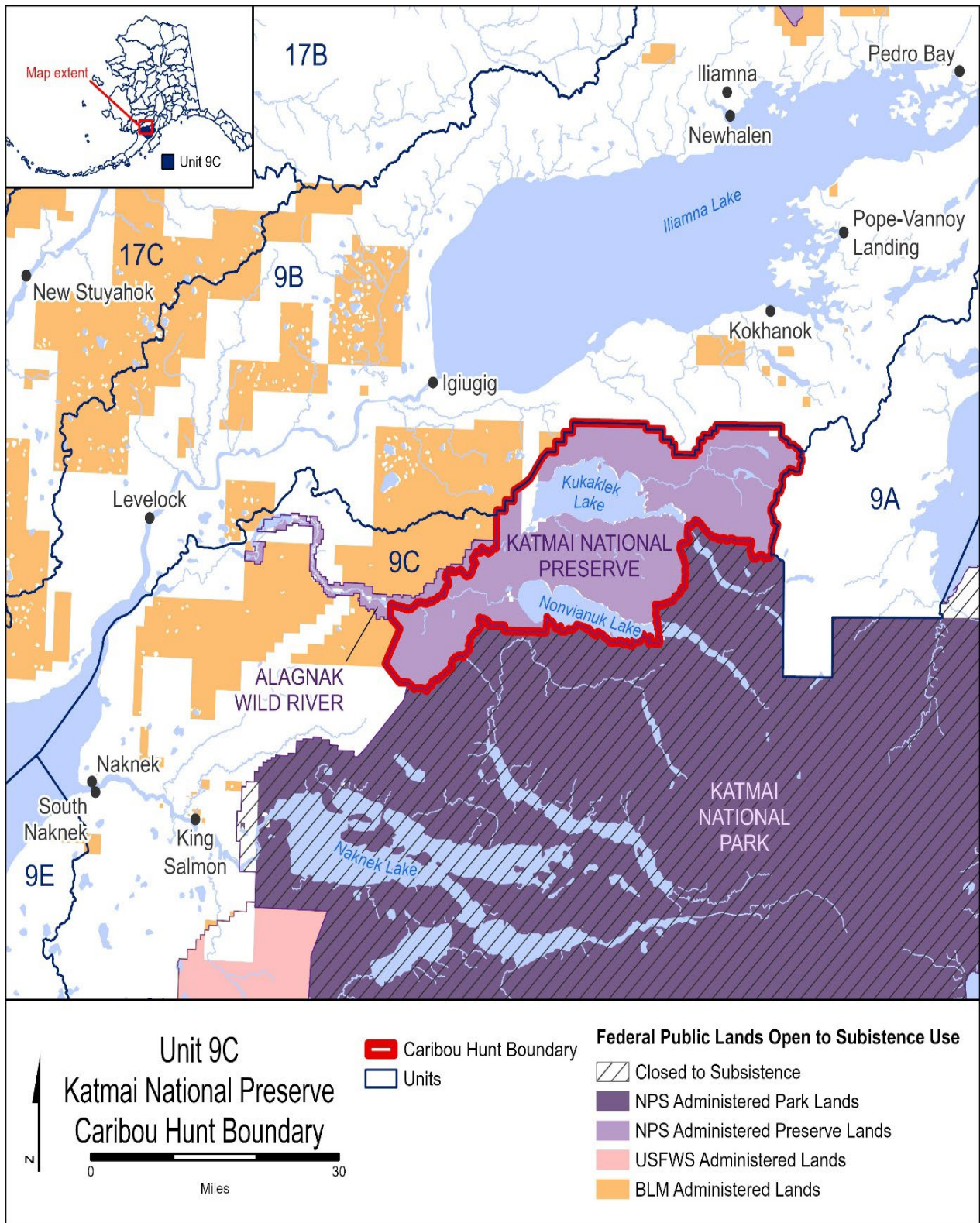


Figure 1. Map of Unit 9C, within Katmai National Preserve, the hunt area affected by this special action.

The applicable Federal regulations are found in 43 CFR 51.19(a) and 36 CFR 242.19(a) (Emergency Special Actions) and state that:

“...In an emergency situation, if necessary to ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons, the Board may immediately open or close public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for take for subsistence uses, or close public lands to take for nonsubsistence uses of fish and wildlife, or restrict the requirements for take for nonsubsistence uses.”

Current Federal Regulations

Unit 9C—Caribou

Unit 9C, that portion within Katmai National Preserve – 1 caribou by Federal Registration permit

Federal public lands are closed to the taking of caribou except by residents of Igiugig and Kokhanok hunting under these regulations.

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

Proposed Federal Regulations

Unit 9C—Caribou

*Unit 9C, that portion within Katmai National Preserve – **up to 2 ±** caribou by Federal registration permit **during the 2026 fall hunt.***

OR

1 caribou by Federal registration permit during the 2026/27 winter hunt.

Federal public lands are closed to the taking of caribou except by residents of Igiugig and Kokhanok hunting under these regulations.

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

Current State Regulations

Note: These are the State regulations in Unit 9C for the 2025/26 regulatory year. An emergency order is expected in July 2026, announcing caribou season openings. However, State regulations do not apply in the affected hunt area due to the Federal lands closure.

Unit 9—Caribou

*Residents: Unit 9C, that portion within the Alagnak River drainage – No open season
One caribou by permit (RC503)*

*Residents: Unit 9C, that portion north of the north bank of the Naknek No open season
River and south of the Alagnak River drainage – 2 caribou by permit
(RC503)*

*Residents: Unit 9C, south of the north bank of the Naknek River – 1 Aug. 10 – Oct. 10
caribou by permit (TC505).
Nov. 1 – Feb. 28*

Both residents and nonresidents: Unit 9C remainder No open season

Extent of Federal Public Lands

Unit 9C is comprised of approximately 86% Federal public lands that consist of 78% NPS, 4% U.S. Fish and Wildlife Service (USFWS), and 4% Bureau of Land Management (BLM) managed lands. The majority of NPS managed lands are within Katmai National Park and are closed to all hunting, including subsistence uses (**Figure 1**).

The area affected by WSA26-06, Katmai National Preserve, is comprised of 100% Federal public lands and consists of 100% NPS managed lands.

Customary and Traditional Use Determination

Rural residents of Units 9B, 9C, 17 and Egegik have a customary and traditional use determination for caribou in Unit 9C.

Regulatory History

Caribou in the northern portion of Unit 9C, including Katmai National Preserve have historically been managed as part of the Mulchatna Caribou Herd, along with Units 9A, 9B, 17, 18, 19A, and 19B. Due to severe population declines and conservation concerns for the Mulchatna herd, these hunts have been restricted since 2019, and completely closed since 2021 under State and Federal regulations.

In April 2024, the Federal Subsistence Board (Board) considered Wildlife Proposal [WP24-15](#) to establish a hunt for a resident caribou herd within Katmai National Preserve in Unit 9C for the residents of Igiugig only. The proposed season dates were Aug. 1-Sept. 30 and Nov. 1-Mar. 31 with a harvest limit of one caribou by Federal registration permit. Local residents attested that caribou remain in this area year-round and that their numbers were increasing substantially. The Board adopted Proposal WP24-15 as modified

by OSM to establish a “may be announced” season and delegate authority to the Katmai NPP superintendent to manage the hunt via delegation of authority letter (DAL) only (**Appendix 1**), and limit eligibility to harvest caribou in the area to residents of Igiugig and Kokhanok via an ANILCA Section 804 user prioritization. Section 804 prioritizations identify which federally qualified subsistence users should have a priority for the take of a limited resource in a particular area, when it is determined that harvest restrictions are needed due to significant conservation concerns or the need to ensure the continuation of subsistence uses among a subset of users most dependent on the resource. Three criteria are used to make these determinations: (1) Customary and direct dependence upon the populations as the mainstay of livelihood; (2) Local residency/proximity to the resource; and (3) Availability of alternative resources.

The Section 804 prioritization adopted under WP24-15 determined that out of the 23 communities with a customary and traditional use determination for caribou in this unit, the residents of Igiugig and Kokhanok exhibited the greatest proximity to, and dependence upon, the Kukaklek (*Qukaqliq*) Shelf Caribou Herd. The DAL associated with this hunt includes the authority to announce, open, and close a season between Aug. 1 - Sept. 30 and Nov. 1 – Mar. 31, to announce the annual harvest quota, determine the number of permits issued annually, set sex restrictions, and set permit conditions.

Current Events

ADF&G expects to issue an Emergency Order in July 2026 announcing a winter 2026/27 caribou season for the Kukaklek Shelf caribou population in Unit 9C with a harvest limit of 2 caribou by State registration permit. ADF&G also plans to submit a corresponding Federal special action.

Biological Background

Katmai NPP and ADF&G have been working together to radio collar some of the Kukaklek Shelf caribou and gather more biological information (BBSRAC 2023). Based on observations from Katmai National NPP, the Kukaklek Shelf Caribou Herd tends to stay close to the Kukaklek Bench and does not migrate. Flights are conducted to do minimum count surveys of the herd by getting photo images for counts based on the radio collar locations. Since 2021, Katmai NPP has conducted minimum counts of these caribou in and around Katmai NPP during late winter, prior to calving. Counts have ranged from 306 to 821 caribou (**Table 1**), with no survey conducted in 2023 (Skora 2026, pers. comm.). Fall composition surveys between 2023 and 2025 included minimum counts ranging from 398 to 1,134 caribou (Vande Voort 2025). Between 2023 and 2025, fall composition ratios ranged from 34-45 bulls:100 cows and 37-43 calves:100 cows (**Table 1**, Vande Voort 2025).

ADF&G placed radio collars on eight caribou near Kukaklek and Nonvianuk Lakes within Katmai National Preserve to determine if the Mulchatna Caribou Herd is still one herd or if it has separated into separate, distinct herds (BBSRAC 2020; Patterson 2023). Additionally, the potential for caribou in Katmai National Preserve to be a non-migratory population (Kukaklek Shelf caribou) that is not part of the Mulchatna Caribou Herd was voiced during Tribal consultation for WSA19-07 and several Bristol Bay Council meetings (BBSRAC 2020, 2022, 2023). Between October 2024 and 2025, radio-collared Kukaklek Shelf caribou did not move west of Iliamna Lake, indicating this herd is not mixing with Mulchatna caribou (Vande Voort 2025) and supporting local reports that the herd does not migrate.

Information continues to be gathered regarding the locations of the herd throughout the year with additional collar deployment and data collection.

Table 1. Kukaklek Shelf Caribou fall composition and winter minimum population count data from ADF&G and Kamai NPP surveys (Skora 2026, pers. comm., Vande Voort 2025). Dash lines indicate data was not collected or not available.

Year	Calves: 100 Cows	Bulls: 100 Cows	Composition sample size	Winter Minimum Count
2021	-	-	-	312
2022	-	-	-	306
2023	43	44	435	-
2024	37	34	398	425
2025	38	45	1,134	821
2026	-	-	-	792

Cultural Knowledge and Traditional Practices

Archaeological surveys and historical accounts document the primacy of the ocean in feeding the people of the Alaska Peninsula, but they also describe the importance of caribou, particularly for those communities of the western Bristol Bay portion of the peninsula (Lantis 1984; Morseth 2003; VanStone 1984a; VanStone 1984b). As early as 8,000 years ago, people of the Paleo-Arctic cultural tradition occupied sites near the Kvichak River (Morris 1985), located about 75 miles from the contemporary Katmai NPP area. Archaeologists believe that these Kvichack River sites may have been used as seasonal caribou hunting camps, as the sites were located on dunes suitable for observing migrating herds (Morris 1985). Around 6,000 years ago, people of the Ocean Bay cultural tradition occupied sites in the Naknek Area along the Brooks River, just about 30 miles from contemporary Katmai NPP (Morris 1985). Inhabitants of these Naknek Area sites harvested caribou seasonally in the interior of the Upper Alaska Peninsula and may have used Katmai Pass as a travel corridor between the Pacific Coast and the Upper Alaska Peninsula (Morris 1985). By about 2,400 years ago, subsistence and settlement patterns in the Bering Sea and Alaska Peninsula Regions were clearly based on the harvest of three key resources: marine mammals, salmon, and caribou (Shaw 1998, Gillispie 2018). During this period, migrating caribou were likely harvested during the fall in upland areas adjacent to permanent coastal villages, or in seasonal camps further inland that were accessed via Katmai Pass (Morris 1985, Shaw 1998, Gillispie 2018).

Historically, a large caribou population roamed the coast of the Bering Sea from Bristol Bay to Norton Sound (Skoog 1968, Holen et al. 2005, Aderman 2015). Numerous large herds were observed 150 to 250 miles away from the current site of Katmai NPP, near the headwater lakes of the Igushik River in the early 1800s (VanStone 1988), and near Cape Newenham in the late 1800s (Petroff 1884). Scattered caribou were also observed in the Lake Iliamna area in the early 1800s, about 70 miles from contemporary Katmai NPP (Holen et al. 2005). The Mulchatna herd peaked in the 1860s and began to decline in the 1870s (Holen et al. 2005). By 1880, the herd was no longer migrating north into the Yukon and

Kuskokwim river drainages (Holen et al. 2005). Commercial reindeer herding was introduced to the Bristol Bay area in the early 1900s, and a reindeer station was located near Kokhanok (Holen et al. 2005). The Mulchatna herd increased somewhat in the 1930s, but it began declining again by the late 1930s (Holen et al. 2005). The Bristol Bay reindeer industry failed by the mid-1940s (Ackerman 2015), and many reindeer joined the nearby Mulchatna and Alaska Peninsula caribou herds over time (Krieg et al. 2009).

The population of the Mulchatna herd generally increased from the late-1940s to the mid-1990s (Landsiedel and Lichwa 2026), but herd migration patterns regularly fluctuated during this period, with corresponding impacts on area residents' ability to access and harvest caribou (Holen et al. 2005, Krieg et al. 2009). The herd experienced a precipitous decline following its mid-1990s peak, primarily due to overgrazing (Landsiedel and Lichwa 2026). During some of the more recent subsistence surveys conducted in Units 9 and 17, many residents were experiencing the impacts of this Mulchatna population decline, as caribou were less available and harvest regulations were more restrictive (Holen et al. 2005, 2011, 2012; Fall et al. 2006, Krieg et al. 2009, Jones et al. 2024). Some residents were relying more on moose to help compensate for the lack of caribou (Krieg et al. 2009).

There are currently 23 communities with a customary and traditional use determination for caribou in Unit 9C. Collectively, about 6,000 people lived in these communities in 2025 (**Table 2**). Dillingham is the largest of these communities, and it functions as the hub of transportation, health care, and trade in the larger Bristol Bay region (**Table 2**). Human populations in the region steadily increased from about 1960 to 2000, but they have generally decreased since this time (**Table 2**). Commercial fishing and fish processing have been important to the regional economy since the late 1800s (ADCCED 2025). Sport fishing and hunting, as well as support services for these industries have also become important sources of income and employment in the area. Federal, State, local, and/or Tribal governments also have a significant presence and provide employment in many of the communities in the region (Krieg et al., 2009).

As a result of the ANILCA Section 804 restriction adopted in 2024, only the residents of Igiugig and Kokhanok may hunt caribou in the Katmai National Preserve. These two communities reside in close proximity to the Preserve and were determined to exhibit the greatest dependence on the Kukaklek (*Qukaqliq*) Shelf Caribou Herd. Igiugig and Kokhanok are both small, primarily Alaska Native communities located in the traditional territory of the Aglurmiut Central Yup'ik (Krieg et al. 2009). Both communities have been extensively involved in the commercial fishing and reindeer herding industries, and they each have long histories of harvesting subsistence resources from the area that is now the Katmai National Park and Preserve (Krieg et al. 2009, OSM 2024). The harvest of wild resources remains a key component of the economies of Igiugig and Kokhanok, and both communities rely on a wide diversity of resources such as: salmon, non-salmon fish, large land mammals (e.g. caribou and moose), marine mammals (e.g. seals and sea lions), migratory waterfowl (e.g. ducks and geese), other birds (e.g. ptarmigan and grouse), furbearers, berries, greens, and wood (Holen et al. 2005, Krieg et al. 2009, BBRAC 2023). However, fish and large land mammals like caribou typically account for the greatest proportion of each community's subsistence harvests (OSM 2024).

Igiugig residents have used, harvested, and given caribou away at greater rates than residents of Kokhanok during subsistence studies periodically conducted since 1973 (**Table 3**). During the most recent subsistence study conducted in 2005, caribou accounted for about 17% of the total per person subsistence harvest in Igiugig, but only 3% of the per person harvest in Kokhanok (Krieg et al. 2009). During this study period, Kokhanok residents noted that the harvest of large land mammals was much lower than it had been recently due to the lack of caribou migrating through the area (Krieg et al. 2009). Moose were also more difficult to find near Kokhanok and were more available near Igiugig and Levelock (Krieg et al. 2009). As one community member explained:

[Kokhanok] residents no longer saw caribou around the village. Caribou were sometimes found south of the village, the respondent said, in the mountains towards Katmai National Park and Preserve, or to the west towards Igiugig. The respondent added that when they did migrate east, the caribou usually traveled on the north side of the lake instead of on the south shore, towards Kokhanok. Therefore, to reach the caribou, Kokhanok residents said they had to travel close to Katmai National Park and Preserve, or to the north side of Iliamna Lake and then towards the Mulchatna River (Krieg et al. 2009: 105).

The rising cost of fuel and the unpredictability of weather conditions were also key concerns for many Kokhanok residents in 2005, as both issues limited their ability to travel to find and harvest subsistence resources like caribou (Krieg et al. 2009). Hunters in the Bristol Bay region have typically searched for caribou in wide areas surrounding their communities (Krieg et al. 1996; Krieg et al. 1998; Holen et al. 2011, OSM 2018), because caribou populations and migration patterns regularly fluctuate (Behnke 2000, Gunn 2003). Weather has become an increasingly important factor in when and where hunters seek caribou in recent years, as hunters have reported that weather has generally gotten warmer over the past several decades (FSB 2024). Local hunters have explained that “In addition to trends towards warmer temperatures during late-fall and early-spring, study respondents reported large-scale changes in snow and ice cover throughout the duration of winter, and that the normal freezing of waterbodies such as lakes and rivers has now also become unreliable” (Van Lanen et al. 2018: 140). These changing weather patterns can lead to changes in caribou migration patterns and make well-established methods of accessing caribou more difficult and dangerous (Van Lanen et al. 2018). Caribou harvests have increased and decreased in tandem with the availability of adequate snow and ice cover for travel, as well as the size of caribou populations and the length of the hunting season (Aderman 2015, Van Lanen et al. 2018).

Table 2. Population of communities with customary and traditional use determination for caribou in Unit 9C from 1960 – 2025 (ADCCED 2025, ADLWD 2025). *(Dashed lines indicate data was not collected or not available).

Community	1960	1970	1980	1990	2000	2010	2020	2025
Aleknagik	231	128	154	185	221	219	211	210
Clark's Point	138	95	79	60	75	62	67	55
Dillingham	424	914	1,563	2,017	2,466	2,329	2,249	2,059
Egegik	-	-	-	-	2	2	-	-
Ekwok	106	103	77	77	130	115	111	106
Igiugig	36	36	33	33	53	50	68	66

Community	1960	1970	1980	1990	2000	2010	2020	2025
Iliamna	47	58	94	94	102	109	108	110
King Salmon	227	202	545	696	442	374	307	298
Kokhanok	57	88	83	152	174	170	152	136
Koliganek	100	142	117	181	182	209	183	183
Levelock	88	74	79	105	122	69	69	69
Manokotak	149	214	294	385	399	442	488	467
Naknek	249	178	318	575	678	544	470	426
New Stuyahok	145	216	331	391	471	510	512	454
Newhalen	63	88	87	160	160	190	168	163
Nondalton	205	184	173	178	221	164	133	121
Pedro Bay	53	65	33	42	50	42	43	40
Portage Creek	0	60	48	5	36	2	4	4
Pope-Vannoy Landing	0	0	0	0	8	6	6	5
Port Alsworth	0	0	22	55	104	159	186	168
South Naknek	142	154	145	136	137	79	67	63
Togiak	220	383	470	613	809	817	817	718
Twin Hills	0	67	70	66	69	74	103	106
Total	2680	3449	4815	6206	7111	6737	6522	6027

Table 3. Harvest and use of caribou in Igiugig and Kokhanok based on subsistence surveys conducted between 1973 and 2005 (Holen et al. 2005, Krieg et al. 2009). *(HHs stands for “Households.” Dashed lines indicate data was not collected or is not available for the particular study year).

Community	Study Year	HHs* Using Caribou (%)	HHs Harvesting Caribou (%)	HHs Giving Caribou (%)	HHs Receiving Caribou (%)	Caribou Harvest per person (lbs.)
Igiugig	1973	-	83	-	-	248
Igiugig	1983	-	33	-	67	16
Igiugig	1992	100	100	90	70	200
Igiugig	2001	100	91	82	36	128
Igiugig	2005	100	58	75	83	91
Average		100	73	82	64	137
Kokhanok	1973	-	11	-	-	21
Kokhanok	1983	-	5	-	47	1
Kokhanok	1992	97	64	64	72	118
Kokhanok	2001	94	25	13	88	22
Kokhanok	2005	80	26	26	63	21
Average		90	26	34	68	37

Harvest History

No legal caribou harvest occurred in Unit 9C between 2021 and 2023 as both State and Federal caribou hunts have been closed due to conservation concerns for the Mulchatna Caribou Herd.

Legal harvest of Kukaklek Shelf caribou began in Regulatory Year (RY) 2024/25 when the Federal hunt was established within Katmai National Preserve via adoption of WP24-15. Ten and 13 permits were issued for the 2024/25 and 2025/26 hunts, respectively with 95% of the harvest occurring during the winter hunt (**Table 4**). Harvest success for this hunt is high at 90% in RY2024 and 100% in RY2025 (OSM 2026).

Table 4. Kukaklek Shelf Caribou harvest data for RY 2024-2025 (OSM 2026). Dash lines indicate data was not collected or not available.

Regulatory Year	Permits Issued (FC096)	Bull Harvest	Cow Harvest	Unknown Harvest	Fall Harvest	Winter Harvest	Total Harvest
2024/25	10	4	5	-	-	9	9
2025/26	13	9	-	4	1	12	13

Alternative(s) Considered

Modify or Rescind the Section 804 Harvest Restriction: Harvest of Kukaklek Shelf caribou is currently limited to residents of Igiugig and Kokhanok via ANILCA Section 804 harvest restrictions. However, there are an additional 21 other communities that have a customary and traditional use determination for caribou in this area and would qualify to harvest these caribou under Federal regulations if the Section 804 restriction were to be rescinded. Since the size of the Kukaklek herd has recently increased to a degree that might cause habitat degradation due to overgrazing, it is likely worth changing the current Section 804 harvest restrictions to allow more federally qualified subsistence users to access and harvest this resource. The conditions that initially warranted these harvest restrictions appear to have changed substantially.

The current 804 restrictions could potentially be modified to allow a limited number of additional communities to harvest Kukaklek caribou, or they could be completely rescinded to allow all communities with a customary and traditional use determination harvest these caribou. The analysis conducted for the proposal that was adopted to establish the current Kukaklek hunt (WP24-15) previously identified Igiugig, Iliamna, King Salmon, Kokhanok, Levelock, Naknek, Newhalen, and South Naknek as communities with clearly demonstrated harvest and use of Unit 9C caribou (OSM 2024). This analysis could be used to help identify the best way to modify the current restrictions to allow some additional communities to harvest Kukaklek caribou. However, implementing or modifying Section 804 harvest restrictions has generally been considered outside the scope of an emergency special action due to the timing constraints associated with this process, and the need for greater Council and public input on decisions that might restrict harvest opportunities for federally qualified subsistence users. The current situation may warrant revisiting this stance, as any modifications to the 804 restrictions considered in this analysis would be made to increase harvest opportunities for federally qualified subsistence users. This

alternative could also be considered as a follow-up temporary special action or formal regulatory proposal.

Discussion and Effects

If this request is approved, the harvest limit for the Kukaklek Shelf caribou hunt within Katmai National Preserve would increase to “up to 2” caribou for less than 60 days during the may-be-announced fall hunt, Aug. 1-Sept. 30, for the 2026/27 regulatory year. However, authority to set harvest limits would need to be delegated to the Federal in-season manager for this change to be implemented. While the harvest limit for the winter hunt, when the vast majority of Kukaklek Shelf caribou have been harvested, would remain the same, a temporary special action is expected in July 2026, from ADF&G, to increase the winter harvest limit. Timing constraints prevented these requests from being submitted and analyzed together.

The establishment of the Federal subsistence harvest regulations for this herd was based on limited information and a population of approximately 300 caribou. The Kukaklek Shelf Caribou Herd population has more than doubled since surveys began in 2021, raising concerns over this herd’s growth rate and its potential impact on its habitat. The herd has grown quickly creating viability and sustainability concerns. Raising the harvest limit for residents of Igiugig and Kokhanok would provide additional opportunity for federally qualified subsistence users and could help slow the growth of the herd. However, modifying or rescinding the ANILCA Section 804 restriction currently in place would significantly expand the pool of federally qualified subsistence users eligible to hunt Kukaklek caribou, and likely have a greater effect on herd size management and habitat conservation.

OSM CONCLUSION

Support Emergency Wildlife Special Action WSA26-06.

Justification

Additional harvest of Kukaklek Shelf caribou is warranted because the herd has grown significantly in recent years and there are now concerns about the potential for habitat degradation due to overgrazing. Increasing the harvest limit for Kukaklek caribou would also provide additional opportunity for federally qualified subsistence users residing in Igiugig and Kokhanok, and it would potentially help mitigate food security concerns in these communities. OSM also supports delegating additional authority to the Katmai NPP superintendent to set harvest limits for the 2026/27 regulatory year so that this change can be effectively implemented.

Modifying or rescinding the ANILCA Section 804 determination currently in place for this hunt could also be used to significantly expand the pool of federally qualified subsistence users eligible to hunt Kukaklek Shelf caribou and thereby increase harvest.

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APPENDIX 1



Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

JUN 20 2024

FOREST SERVICE

In Reply Refer To:
OSM.B24042

Superintendent
Katmai National Park and Preserve
1000 Silver Street, Building 603
King Salmon, Alaska 99613

Dear Superintendent:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the superintendent of Katmai National Park and Preserve (Katmai) to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of a wildlife population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Unit 9C, Katmai National Preserve for the management of caribou on these lands.

It is the intent of the Board that actions related to management of caribou by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), representatives of the Office of Subsistence Management (OSM), and the Chair of the affected Council(s) to the extent possible. The OSM will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local Tribes, and Alaska Native corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. Delegation: The superintendent of Katmai National Park and Preserve is hereby delegated authority to issue emergency or temporary special actions affecting caribou on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and

50 CFR 100.10(d)(6), which state: “The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board.”

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

- Announce the annual harvest quota.
- Announce and open/close a season between August 1 to September 30 and November 1 to March 31.
- Determine the number of permits issued annually.
- Set sex restrictions.
- Set permit conditions. Permit conditions must be approved by OSM and in accordance with the current OMB information collection.

This delegation also permits you to close and reopen Federal public lands to non-subsistence hunting, but does not permit you to specify permit requirements or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve caribou populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations, shall be directed to the Board.

The Federal public lands subject to this delegated authority are those within Unit 9C, Katmai National Preserve.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 50 CFR 100.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected federally qualified subsistence users and non-federally qualified users. Requests not within your delegated authority will be forwarded to the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Consultation Policies (Federal Subsistence Board Government-to-Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).

You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of federally qualified subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

Sincerely,



Anthony Christianson
Chaircc: Federal Subsistence Board

Superintendent

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cc: Federal Subsistence Board
Office of Subsistence Management
Chair, Bristol Bay Subsistence Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director for Wildlife Conservation, Alaska Department of Fish and
Game
Interagency Staff Committee
Administrative Record