

**U.S. DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE  
ALASKA REGION**

**NATIONAL PARK/MONUMENT SUBSISTENCE INDIVIDUAL CUSTOMARY AND  
TRADITIONAL USE DETERMINATION ANALYSIS**

To be completed by the relevant Subsistence Coordinator:

Date: January 6, 2023  
Applicant Name: Kevin Mayo, Danielle Mayo, Breanna Mayo, Kayla Mayo, and Isaiah Mayo  
Analyst Name: Amy Craver

This analysis is in response to the following request:

- Individual Customary and Traditional Use Determination ONLY

*Please type a brief summary of the applicant's reported subsistence use pertaining to the request, as determined from information provided on the application and during the interview:*

See accompanying analysis.

For a National Park/Monument Subsistence Eligibility Permit (13.440), the analysis should address the following topics:

1. Synopsis of the applicant's pattern of use specifically in the National Park or Monument for which the permit is requested, including the following:
  - a. Species harvested: moose, caribou, grouse, and ptarmigan
  - b. Specific locations where the use occurred: GMU 13, in areas managed by Denali National Park and Preserve where subsistence uses are allowed.
  - c. Years during which the subsistence uses took place: 1982-2006; 2011-2022
  - d. Whether aircraft was used for access. No.
2. Does the pattern of use begin prior to the signing of the Alaska National Interest Lands Conservation Act (ANILCA)? Yes.
3. Does the applicant have a pattern of use established while as a resident of a resident zone community after the passage of ANILCA? Yes.

For an Individual C&T use determination, the analysis should address the following eight questions:

1. Does the applicant have a long-term, consistent pattern of use of these resources, excluding interruptions beyond their control? Please explain.
2. Does the applicant have a pattern of use for these resources recurring in specific seasons for many years? Please explain.
3. Does the applicant have a pattern of use of these resources consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics? Please explain.
4. Does the applicant exhibit consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the park unit? Please explain.
5. Does the applicant exhibit a means of handling, preparing, preserving, and storing fish or

- explain.
5. Does the applicant exhibit a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate? Please explain.
  6. Does the applicant exhibit a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation? Please explain.
  7. Does the applicant exhibit a pattern of use in which the harvest is shared or distributed within a definable community of persons? Please explain.
  8. Does the applicant exhibit a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to your household?

The analysis should include an integrated discussion of the eight factors. A factor-by-factor discussion is not required in the analysis and it is also not necessary that all eight factors be addressed to demonstrate a pattern of use. The eight factors provide a framework for examining the pattern of use of a resource. There are regional, cultural and temporal variations and the application of the eight factors will likely vary by region and by resource depending on actual patterns of use. The goal of customary and traditional use determination analyses is to recognize customary and traditional uses in the most inclusive manner possible.

As a result of this analysis (Select All that Apply):

- X There is substantial evidence to support the issuance of an Individual Customary and Traditional Use Determination.** Yes, moose, caribou, grouse, and ptarmigan in GMU 13, in areas managed by Denali National Park and Preserve where subsistence uses are allowed.
- There is NOT substantial evidence to support the issuance of an Individual Customary and Traditional Use Determination for (species location).

**Brief Justification:**

As is evidence in the analysis, the proponents exhibit a clear long-term and consistent use of moose, caribou, grouse, and ptarmigan in GMU 13, in areas managed by Denali National Park Sand Preserve where subsistence uses are allowed. This pattern has been repeated for many years and through several generations. Methods and means are characterized by efficiency of economy of effort and cost based on local characteristics. The pattern is consistent with past methods and means of harvests at or near the family's hunting camp within the Unit in question. Knowledge of handling, preparing, preserving, and storing moose meat is shared among and between generations, as is knowledge of the skills, values, and lore associated with hunting moose, caribou, grouse, and ptarmigan. Moose, caribou, grouse, and ptarmigan are regularly shared with family and community members such as elders. The proponents demonstrate a pattern of use that relates to reliance on a wild diversity of wild foods that provide this family with cultural, economic, social, and nutritious benefits. All eight of the factors associated with C&T determination are evident. Furthermore, this family's pattern of use is also evidence through the Federal Subsistence previous determination for Kevin Mayo for moose and caribou. For these reasons, I believe that there is substantial evidence to support the issuance of an individual C&T determination for moose, caribou, grouse and ptarmigan within GMU13 of Denali National Park and Preserves where subsistence is allowed for the proponents, including all members of the Kevin Mayo family that reside within the same household as Kevin Mayo.

Signature of Analyst: \_\_\_\_\_

*[Handwritten Signature]*

Date: \_\_\_\_\_

*[Handwritten Date: January 6, 2023]*

**U.S. Department of the Interior**

**National Park Service**

**Alaska Region**

**Individual Customary and Traditional (C&T) Use Determination**

**Subsistence Resource Commission (SRC) Recommendation**

To be completed by the relevant Subsistence Coordinator:

Date of Formal Action: January 11, 2023  
Proponent Name: Kevin Mayo and members of his household family  
Proponent Request: Moose, Caribou, grouse, and ptarmigan in Game Management Unit 13 (GMU 13) in areas managed by Denali National Park and Preserve where subsistence uses are allowed.  
Affected SRC: Denali Subsistence Resource Commission

This SRC has determined that (select all that apply):

- There is sufficient evidence to support an individual C&T use determination for Kevin Mayo and members of his household family: Danielle Mayo (wife), Isaiah Mayo (son), Kayla Mayo (daughter), and Branna Mayo (daughter) for moose, caribou, grouse, and ptarmigan in Game Management Unit 13 (GMU 13) in areas managed by Denali National Park and Preserve where subsistence uses are allowed.
  
- There is NOT sufficient evidence to support an individual C&T use determination for Kevin Mayo and members of his household family: Danielle (wife), Isaiah Mayo (son), Kayla Mayo (daughter), and Branna Mayo (daughter) for moose, caribou, grouse, and ptarmigan in Game Management Unit 13 (GMU 13) in areas managed by Denali National Park and Preserve where subsistence uses are allowed.

Brief justification for above decision:

According to the SRC, due diligence has been achieved documenting Kevin's family's pre-ANILCA history of using the Park additions established by ANILCA. The SRC believes that C&T requests need to be expedited so as to allow for subsistence customs and traditions to continue so that qualified families can carry on their participation in subsistence activities to future generations.

Signature of SRC Chair Justin L Mason Date 01/17/2023