

<b>ICPT21-01 Executive Summary</b>	
<b>General Description</b>	<p>Proposal ICPT21-01 requests an individual customary and traditional use determination for moose and in Unit 13E. In areas managed by the National Park Service where subsistence uses are allowed, customary and traditional use determinations may be made on an individual basis. <i>Submitted by Blaine Mayo, Tracy Mayo, Owen Mayo, Adelynn Mayo, and Ryland Mayo.</i></p>
<b>Proposed Regulation</b>	<p><b>Federal Regulation Regarding Individual Customary and Traditional Use Determinations for National Parks and Monuments</b></p> <p><i>§_16 Customary and traditional use process</i></p> <p><i>(a) The Board shall determine which fish stocks and wildlife populations that have been customarily and traditionally used for subsistence. These determinations shall identify the specific community's or area's use of specific fish stocks and wildlife populations. For areas managed by the national Park Service, where subsistence uses are allowed, the determinations may be made on an individual basis.</i></p> <p><b>Customary and Traditional Use Determination</b></p> <p><b>Unit 13E—Moose</b></p> <p><i>Rural residents of Unit 13, Chickaloon, McKinley Village, Slana and the area between mileposts 216-239 of the Parks Highway and Kevin Mayo, <b>Blaine Mayo, Tracy Mayo, Owen Mayo, Adelynn Mayo, and Ryland Mayo</b>*. No Federal subsistence priority for the residents of Denali National Park headquarters.</i></p> <p><i>*Note: Names of individuals do not appear in regulation booklets, they are on a list maintained by the respective National Park Service subsistence manager.</i></p>
<b>National Park Service Recommendation</b>	
<b>Southcentral Subsistence Regional Advisory Council Recommendation</b>	
<b>Eastern Interior Subsistence Regional Advisory Council Recommendation</b>	
<b>Denali National Park Subsistence Resource Commission Recommendation</b>	
<b>Public Comments</b>	

## **DRAFT STAFF ANALYSIS ICPT21-01**

### **Issues**

Proposal ICPT21-01, submitted by Blaine Mayo of Healy, requests an individual customary and traditional use determination for moose in Unit 13E in areas managed by the National Park Service where subsistence uses are allowed. This request also includes the following members of the Mayo household: Tracy Mayo, Owen Mayo, Adelynn Mayo, and Ryland Mayo. Mr. Mayo intends to continue his family's traditional subsistence lifestyle with his wife and children.

### **Discussion**

The proponent has described a history of customary and traditional use of moose in Unit 13E within Denali National Park. Mr. Mayo holds a National Park Service subsistence use permit (13.440 permit, 36 CFR §13.440).<sup>1</sup> He and his family are from Cantwell, which is a resident zone community of Denali National Park. Mr. Mayo is currently ineligible to harvest moose in this area because he now resides in a rural community (Healy) which does not have a customary and traditional use determination for moose in Unit 13E.

According to National Park Service regulations, if a person has a 13.440 subsistence eligibility permit, lives within the boundaries of the Park or lives in a resident zone community, that person must also live in a community or area that has a customary and traditional use determination for the desired species and harvest area (NPS 2010a:3). If a person has a 13.440 permit and lives in a community or area without a customary and traditional use determination for the species they wish to hunt, they may submit a proposal to the Federal Subsistence Board for an individual customary and traditional use determination.

Federal subsistence regulations allow the Board to make individual customary and traditional use determinations in NPS-managed National Park and National Monument areas where subsistence is authorized, but not in Preserves. National Park Service

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<sup>1</sup> Individuals residing outside of Denali National Park and Preserve's resident zone communities who have a personal or family history of using the Park additions established by ANILCA in 1980 for subsistence purposes at the time ANILCA was passed, may obtain a special subsistence use permit (36 CFR 13.440). They must provide documentation of their traditional subsistence use, without the use of aircraft for access. Eligible subsistence users for Denali National Park and Preserve must also comply with the Federal Subsistence Management Regulations regarding the harvest of fish and wildlife (NPS 2010b).

regulations include unique subsistence eligibility requirements for National Park Service lands. Fewer people have subsistence eligibility in National Parks and National Monuments as compared to other Federal public lands. Requests for individual customary and traditional use determinations are analyzed in the same way that a community or area request for a customary and traditional use determination is analyzed (FSB 1999: 224). Subsistence harvests are authorized only in the ANILCA additions to Denali National Park.

## **Existing Federal Regulation**

### Federal Regulation Regarding Individual Customary and Traditional Use Determinations for National Parks and Monuments

#### § \_\_.16 Customary and traditional use process

*(a) The Board shall determine which fish stocks and wildlife populations that have been customarily and traditionally used for subsistence. These determinations shall identify the specific community's or area's use of specific fish stocks and wildlife populations. For areas managed by the national Park Service, where subsistence uses are allowed, the determinations may be made on an individual basis.*

## **Customary and Traditional Use Determination**

### Unit 13E-Moose:

*Rural residents of Unit 13, Chickaloon, McKinley Village, Slana and the area between mileposts 216-239 of the Parks Highway and Kevin Mayo<sup>2</sup>. No Federal subsistence priority for the residents of Denali National Park headquarters.*

## **Proposed Federal Regulation**

### Federal Regulation Regarding Individual Customary and Traditional Use Determinations for National Parks and Monuments

#### § \_\_.16 Customary and traditional use process:

*(a) The Board shall determine which fish stocks and wildlife populations that have been customarily and traditionally used for subsistence. These determinations shall identify the specific community's or area's use of specific fish stocks and wildlife*

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<sup>2</sup> Names of individuals do not appear in regulation booklets, they are on a list maintained by the respective National Park Service subsistence manager.

populations. For areas managed by the national Park Service, where subsistence uses are allowed, the determinations may be made on an individual basis.

### **Customary and Traditional Use Determination**

#### Unit 13E-Moose:

*Rural residents of Unit 13, Chickaloon, McKinley Village, Slana and the area between mileposts 216-239 of the Parks Highway and Kevin Mayo, **Blaine Mayo, Tracy Mayo, Owen Mayo, Adelynn Mayo, and Ryland Mayo**<sup>3</sup>. No Federal subsistence priority for the residents of Denali National Park headquarters.*

### **Other Relevant Federal/National Park Service Subsistence Regulations**

#### Federal Regulation Regarding Individual Customary and Traditional Use Determinations for National Parks and Monuments

#### 36CFR§ 13.41 Applicability:

*Subsistence uses by local rural residents are allowed pursuant to the regulations of this Subpart in the following park areas:*

- (a) In national preserves;*
- (b) In Cape Krusenstern National Monument and Kobuk Valley National Park;*
- (c) Where such uses are traditional (as may be further designated for each park or monument in Subpart C of this part) in Aniakchak National Monument, Gates of the Arctic National Park, Lake Clark National Park, Wrangell-St. Elias National Park, and the Denali National Park addition.*

#### 36CFR§ 13.440 Subsistence permits for persons whose primary, permanent home is outside a resident zone:

*(a) Any rural resident whose primary, permanent home is outside the boundaries of a resident zone of a national park or monument may apply to the appropriate Superintendent pursuant to the procedures set forth in Sec. 13.51 for a subsistence permit authorizing the permit applicant to engage in subsistence uses within the national park or monument. The Superintendent shall grant the permit if the permit applicant demonstrates that,*

- (1) Without using aircraft as a means of access for purposes of*

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<sup>3</sup> Names of individuals do not appear in regulation booklets, they are on a list maintained by the respective National Park Service subsistence manager.

taking fish and wildlife for subsistence uses, the applicant has (or is a member of a family which has) customarily and traditionally engaged in subsistence uses within a national park or monument; or

(2) The applicant is a local rural resident within a resident zone for another national park or monument, or meets the requirements of paragraph (a)(1) of this section for another national park or monument, and there exists a pattern of subsistence uses (without use of an aircraft as a means of access for purposes of taking fish and wildlife for subsistence uses) between the national park or monument previously utilized by the permit applicant and the national park or monument for which the permit applicant seeks a subsistence permit.

### Extent of Federal Public Lands/Waters

Federal public lands comprise approximately 23% of Unit 13E; 19.4% managed by the National Park Service and 3.9% managed by the Bureau of Land Management.

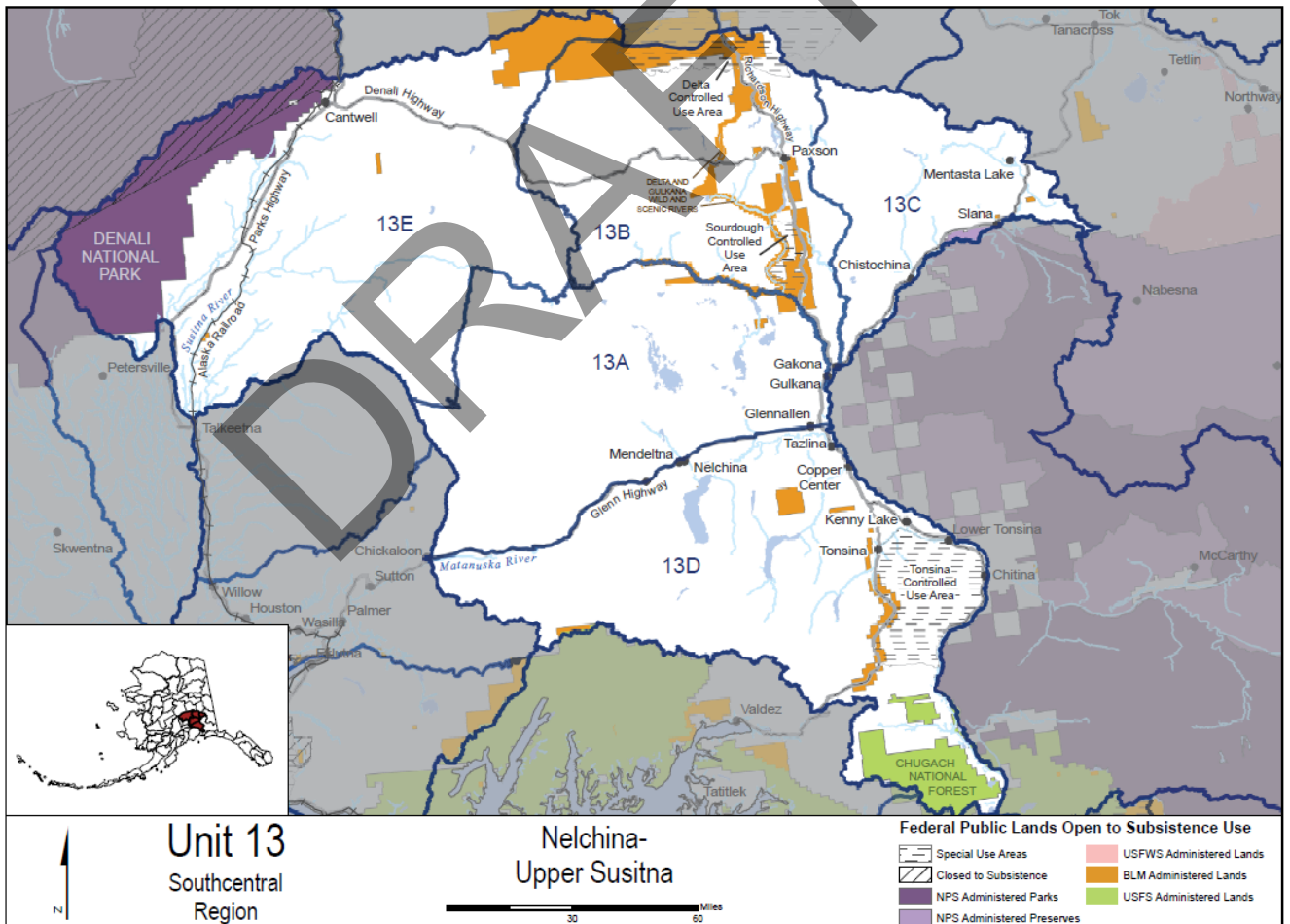


Figure 1. Map of Unit 13E and surrounding area (U.S. Fish and Wildlife Service 2021)

## **Regulatory History**

Requests for individual customary and traditional use determinations began almost as soon as the Federal Subsistence Board assumed management authority for subsistence on Federal public lands in 1990. Because of the proximity of the Parks Highway to Denali National Park, many of the first requests came from residents of this area (Norris 2002: 229). Cantwell is the only resident zone community on the highway, yet there are many people who have conducted subsistence harvests in the Park who also live along the highway outside of Cantwell (Norris 2002: 229). Many of the initial individual customary and traditional use proposals were held up for years because of a huge backlog of proposals for community customary and traditional use determinations and lack of clarity as to whether or not individual customary and traditional use determinations were within the purview of the Federal Subsistence Board (Norris 2002: 229-232). In 1999, the Board finally addressed several proposals for individual customary and traditional use determinations. The Department of the Interior's Office of the Solicitor affirmed that the Board "had sufficient legal authority under ANILCA to make customary and traditional use determinations for NPS administered lands on an individual basis" (Norris 2002: 232). Later in 1999 the Board recognized one individual customary and traditional use determination for Denali National Park and several from Wrangell St. Elias National Park (Norris 2002: 232, FSB 1999: 222-243). The Board also denied some of these proposals due to lack of sufficient information exemplifying the eight factors (Norris 2002: 232; FSB 1999: 222-243).

Mr. Blaine Mayo submitted a proposal to the Office of Subsistence Management in 2019 seeking an individual Customary and Traditional Use Determination for moose in Unit 13E. Family members were not included in this proposal. The proposal was deemed invalid because the proponent did not possess a 13.440 subsistence eligibility permit, a requirement stipulated in the Federal Subsistence Board's policy for Individual Customary and Traditional Use Determinations. In January of 2021 the Federal Subsistence Board adopted a revised policy to follow the procedures described in the "Standard Operating Procedures for Issuance of Subsistence Eligibility Permits and Individual Customary and Traditional Use Determinations." The new policy allows for proposals to be submitted on a continuous basis, and also provides for concurrent application for 13.440 Subsistence Eligibility Permits.

### **Eight Factors for Determining Individual C&T Use Determination**

For an Individual C&T use determination, the analysis should address the following 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 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? Please explain.

The Board makes customary and traditional use determinations based on a holistic application of the above eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the

imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

Specific information on each of the eight factors is not required because an individual seeking a customary and traditional use determination only must “generally exhibit” the eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)).

### **Integrated Discussion of the Eight Factors**

To address the eight factors listed above, NPS staff conducted multiple interviews with Blaine Mayo, his brother, Kevin Mayo, and father Scott Mayo. Below is historic and contemporary analysis of the subsistence activities conducted by Blaine Mayo’s family:

*Do the applicants have a long-term, consistent pattern of use of these resources, excluding interruptions beyond their control? Please explain.*

The Cotter/Smith/Mayo extended families have depended upon moose in the Cantwell area as their primary source of sustenance for four generations and have regularly and consistently hunted in Unit 13 for 55 years. Blaine Mayo’s great grandfather, Alywn Smith, came to Alaska in 1937 on a steamship, initially settled in Anchorage, left the state during World War II, and then returned to Anchorage after the war. In 1964, he moved to Cantwell and married into a local Native family (Nellie Norton, sister of Bud Carlson). Soon after he arrived in Cantwell Herman began hunting and trapping on a regular basis in the Cantwell Creek area. Immediately after arriving in Cantwell, Herman, his brothers, and his father formed a corporation and invested in business opportunities within the community of Cantwell. Herman continued his subsistence hunting, fishing, and trapping activities near the Denali Park boundary for many years (Mayo 2009).

As a young child Blaine, accompanied his father, mother, and other relative’s moose hunting, long before he was old enough to hunt himself. Blaine Mayo started hunting moose when he was fourteen years old and continues to hunt with his father, brother, wife, Tracy Mayo, and children: Owen Mayo, Adelynn Mayo, and Ryland Mayo (Mayo 2021).

Blaine Mayo moved to Healy in 2018. Prior to 2004 Blaine Mayo lived in Cantwell and routinely received Federal subsistence moose permits for GMU 13E. Blaine did not apply for a permit hunt in 2005-2018 because he was living part time in Wasilla and Healy while he worked at the Usibelli Coal Mine in Healy. Although Blaine was not qualified for a Federal subsistence moose permit between 2005-2018, he continued to actively participate in his family’s traditional moose hunting traditions by helping with the butchering, packing, and processing of the moose (Mayo 2021).



*Do the applicants have a pattern of use for these resources recurring in specific seasons for many years? Please explain.*

The family typically harvests moose in September after the weather cools. This pattern of use has recurred since 1964 (Mayo 2021).

*Do the applicants 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.*

The Cotter/Smith/Mayo travel to their hunting area to hunt moose by foot and off-road vehicles (ORV) and all-terrain vehicles (ATV) such as Coots and Weasels. The Cotter/Smith/Mayo family continues to maintain a reoccurring pattern of use within the area using traditional methods and means which are characterized by efficiency and economy of effort. According to Mayo, one of the main benefits for using a Coot and a trailer is that the Mayo family can haul all their family and gear to camp in one load. Once the family sets up their camp, they walk about two miles to a hill where they sit and spot for a moose with binoculars. Once they spot moose, they walk to within shooting distance of the moose. After they shoot the moose (generally located within the traditional use area), they pack out the moose by foot to a designated ORV trail to camp and then return with the Coot to haul out the moose. Once the moose is at camp, they hang sections of meat from a meat pole and cover it with a tarp (Mayo 2009).

Blaine Mayo's grandfather, Herman Cotter, started using a Bombardier around '68/ '69, which is a beefed-up snow machine like vehicle with an open cab and skies that run on an elaborate track. Herman also used Snow Tracs, which looks like a miniature Bombardier with metal cleated tracks. In the '70s Cotter started using a Swamp Buggy. The benefit of a track vehicle is that it is easier on the environment than 4-wheelers. Historically, and to this day, subsistence hunters use motorized vehicles to pack out their meat (Mayo 2009).

In the past, the Mayo family used to put their tent up and take it down after every hunting season; however, fifteen years ago, they built a tent platform. Generally, the extended family prefers to hunt close to their camp. If they hunt a distance from camp it is difficult to salvage the moose and the likelihood of bears getting into the moose meat increases. Typically, the Cotter/Smith/Mayo families remain at their camp until they get their moose. This is partially because the weasel vehicles require a lot of maintenance and it is better to use them as little as possible and the family enjoys the social aspects related to spending extended time at hunting camp (Mayo 2009).

*Do the applicants 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.*

The Mayo's use all edible parts of the moose. Much of the meat is canned or stored in the freezer to preserve it and some portions of the moose are processed by drying. Mr. Mayo uses the same handling techniques that he was taught by his father, grandfather, and great grandfather.

*Do the applicants 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.*

Knowledge, skills, and the use of hunting areas are passed from generation to generation. Blaine Mayo's grandparents learned how to hunt in the Cantwell areas and passed this knowledge on to their extended family. Blaine has hunted moose every year since he turned 14 years old. Blaine continues these traditions with his family and is passing them on to his wife and children. Hunting, trapping, berry picking, and fishing are significant values upon which the Mayo family is dependent upon. Moose hunting is a family event, participated and shared by all the family members within and between households. Typically, the extended family harvests one moose per hunting season. The family never take more than one moose as a family per hunting season (Mayo 2009).

Blaine's great grandparents passed down their traditional subsistence lifestyle to their extended multi-generational family. It is this traditional subsistence lifestyle that wants to continue to pass down to his wife and children.

According to Blaine,

*"I have learned a lot over the years of hunting with my parents, brother and friends. I'm never one to push the knowledge that I have onto anyone saying my way is the only way but I'm always one for sharing whatever knowledge I have. There are literally a thousand different ways skin an animal. Whenever we harvest an animal, we all know our places and go from there, it's like clockwork. If there's any questions, I'll step in or someone will suggest something different to me. I'll explain verbally to people on how I skin and break down an animal then in the field I can demonstrate. Bird hunting is another huge part of my life. Ptarmigan and spruce hens were always part of moose and caribou hunting. When we went out to moose camp or caribou hunting, we always had a .22 to harvest birds. Hunting is more than just going out and shooting an animal, it's a huge part of our lives. It's amazing family time, camping, making of memories and showing our kids what we grew up doing. I have*

*three amazing kids; the twins are 5 and our youngest is almost 4. They love to go out to hunting. Moose camp and our winter camp is always on their minds. We've showed them how to call moose, to look for paddles in the brush, how to fish the creeks, lakes and how to ice fish. It's truly a blessing to be able to pass down what I've learned from my parents and family down to my kids. And they still learn from my parents and family, it's a beautiful thing (Mayo 2021)!*

*As far as fishing goes, again, I've learned a lot from my parents, brother, sister and my grandparents. One of my more favorite fish to break down are burbot. I learned that specifically from my dad. I try to pass on my knowledge with breaking down burbot to my friends, but they would rather me just do it, which I'm fine with. Grayling, lake trout, salmon and other fish are always a blessing to have in the freezer or better yet on the plate. Explaining on how to catch fish in the summer, fall and winter are always an interesting topic. I'll go over depths, bait and what to look for in a lake, creek, or river to where to catch fish. Hunting, fishing, cutting down trees for firewood, being out in the wilderness are ingrained into our lives, it's what we do! Wouldn't change a thing (Mayo 2021).*

The Mayo family hunts together as a family event, often including several generations who participate together in the hunts, establishing camps, and processing harvested meat.

*Do the applicants exhibit a pattern of use in which the harvest is shared or distributed within a definable community of persons? Please explain.*

It is the Mayo's family lifestyle to share moose and equipment. If a family member or friend does not get enough meat for the season it is expected that the Mayo family will share their harvest with that person or household. For example, Blaine's mom always shares moose meat with her sister, mother, and elders (Mayo 2009).

### **Effects of the Proposal**

If adopted, this proposal would recognize Blaine Mayo, Tracy Mayo, Owen Mayo, Adelynn Mayo, and Ryland Mayo's customary and traditional uses of moose in Unit 13E and would allow Mr. Mayo to share his traditional subsistence lifestyle with his wife and children. As described above, there is a documented history of the Cotter/Smith/Mayo extended family sharing in the traditional subsistence lifestyle, including the harvest, use, and preservation of moose from Federal Public Lands in Unit 13E. To facilitate preservation of these family traditions, this determination request includes the next generation of the Mayo family. Because this customary and traditional use determination

is for members of a single household who have a history of moose harvests in this area, the effects on other users should be minimal.

## **NPS PRELIMINARY CONCLUSION**

**Support** Proposal ICTP21-01.

### **Justification**

Mr. Mayo and his household possesses a National Park Service subsistence eligibility permit (13.440 permit) for Denali National Park. Mr. Mayo and the members of his household provided substantial information regarding their family's customary and traditional use of moose that exemplify the eight factors for customary and traditional use determinations. As evidenced in the analysis, the proponents exhibit a clear long-term and consistent pattern of use of moose in Unit 13E. 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 harvest 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 in the area. Moose meat is regularly shared within the family and within the broader Cantwell and Healy communities. The proponents demonstrate a pattern of use that relates to reliance on a wide diversity of wild foods that provides the family with cultural, economic, social, and nutritional benefits. Furthermore, this family's pattern of use is also evidenced through the Federal Subsistence Board's previous determination for Blaine Mayo's brother, Kevin Mayo, in 2010. For these reasons, there is substantial evidence to support the issuance of an Individual Customary and Traditional Use Determination for the proponents, all members of the same household and nuclear family unit.

## **LITERATURE CITED**

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DRAFT

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

**NATIONAL PARK/MONUMENT SUBSISTENCE ELIGIBILITY PERMIT\* & INDIVIDUAL CUSTOMARY  
AND TRADITIONAL USE DETERMINATION ANALYSIS**

*(\*For determination of subsistence eligibility under the provisions of 36 CFR 13.440.)*

To be completed by the relevant Subsistence Coordinator:

Date: February 4, 2021

Applicant Name: Blaine Mayo, Tracy Mayo, Owen Mayo, Adelyn Mayo, Ryland Mayo

Analyst Name: Amy Craver

This analysis is in response to the following request (Choose One):

- Subsistence Eligibility Permit ONLY
- Individual Customary and Traditional Use Determination ONLY
- Subsistence Eligibility Permit AND Individual Customary and Traditional Use Determination

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:

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

1. Synopsis of the applicant's pattern of use<sup>4</sup> specifically in the national park or monument for which the permit is requested, including the following:
  - a. Species harvested,
  - b. Specific locations where the use occurred,
  - c. Years during which the subsistence uses took place, and
  - d. Whether aircraft was used for access.
2. Does the pattern of use begin prior to the signing of the Alaska National Interest Lands Conservation Act (ANILCA)?

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<sup>4</sup> There may be variation by region and/or park on what constitutes a "pattern of use." Generally, there should exist evidence of repeated past attempts to access and harvest subsistence resources within the boundaries of the park or monument. SRCs may be consulted in defining a "pattern of use" for their region.

3. Does the applicant have a pattern of use established while as a resident of a resident zone community after the passage of ANILCA?

For an Individual C&T use determination, the analysis should address the following 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 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? Please explain.

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):

- There is substantial evidence to support the issuance of a Subsistence Eligibility Permit
- There is substantial evidence to support the issuance of an Individual Customary and Traditional Use Determination for moose in Unit 13E.

- There is **NOT** substantial evidence to support the issuance a Subsistence Eligibility Permit
- There is **NOT** substantial evidence to support the issuance an Individual Customary and Traditional Use Determination for (species and location) \_\_\_\_\_

**Brief Justification:**

As is evidenced in the analysis, the proponents exhibit a clear long-term and consistent pattern of use of moose in Unit 13E. 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 harvest 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 in the area. Moose meat is regularly shared within the family and within the broader Cantwell and Healy communities. The proponents demonstrate a pattern of use that relates to reliance on a wide diversity of wild foods that provide this family with cultural, economic, social, and nutritional benefits. All eight of the factors associated with determining Customary and Traditional Uses are evident. Furthermore, this family's pattern of use is also evidenced through the Federal Subsistence Board's previous determination for Blaine Mayo's brother, Kevin Mayo. For these reasons I believe that there is substantial evidence to support the issuance of an Individual Customary and Traditional Use Determination for the proponents, all members of the same household and nuclear family unit.

Signature of Analyst:  Date: 2/4/2021

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