

Federal Subsistence Board
Supplemental Work Session Materials
for August 2-3, 2023

Denali National Park Individual C&T
ICTP23-02



ICTP23-02 EXECUTIVE SUMMARY

General Description

Proposal ICTP23-02 submitted by Kevin Mayo and members of his household, requests an individual customary and traditional (C&T) use determination for moose, caribou, grouse, and ptarmigan in Game Management Unit 13 (GMU 13) in areas managed by the National Park Service where subsistence uses are allowed. Kevin Mayo already has an individual C&T determination for moose and caribou in GMU 13 in areas managed by the National Park Service where subsistence uses are allowed.

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 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

Moose, caribou, grouse, and ptarmigan in GMU 13 in areas managed by Denali National Park and Preserve where subsistence uses are allowed.

Caribou

*Unit 13E Residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, **Kevin Mayo and members of his household**, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters).*

Moose

*Unit 13E Residents of Unit 13, Chickaloon, McKinley Village, Slana, **Kevin Mayo and members of his household**, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters).*

Grouse

Unit 13 Residents of Units 11, 13, Chickaloon, Kevin Mayo and members of his household, 15, 16, 20D, 22 and 23.

Ptarmigan

Unit 13 Residents of Units 11, 13, Chickaloon, Kevin Mayo and members of his household, 15, 16, 20D, 22 and 23.

**Note: Names of individual do not appear in the regulation booklets, they are on a list maintained by the respective National Park Service subsistence manager.*

Table 1: Recommendations

Name	Recommendation
National Park Service	Support
Southcentral Subsistence Regional Advisory Council	Support
Eastern Interior Subsistence Regional Advisory Council	Support
Denali National Park Subsistence Resource Commission	Support
Public Comments	

STAFF ANALYSIS ICTP23-02

ISSUES

Proposal ICTP23-02, submitted by Kevin Mayo and members of his household family, request an individual customary and traditional use determination (C&T) for moose, caribou, grouse, and ptarmigan in GMU 13 in areas managed by Denali National Park and Preserve where subsistence uses are allowed.

DISCUSSION

The proponent has described a history of C&T use of moose, caribou, grouse, and ptarmigan in Denali National Park and Preserve, part of Unit 13E where subsistence uses are allowed. Kevin Mayo and his family are from Cantwell, which is a resident zone community of Denali National Park (Figure 1). In 2010, the Federal Subsistence Board (Board) determined that Kevin Mayo had substantial evidence to support the issuance of an individual C&T for moose and caribou; however, this C&T request for moose and caribou to the Board did not extend to his family members. Currently Mr. Mayo's family members are unable to harvest moose, caribou, grouse, and ptarmigan because they now reside in a rural community (Healy), which does not have a positive C&T for caribou, grouse, and ptarmigan (however, as previously noted Kevin Mayo currently has C&T for moose and caribou).

To be eligible to engage in subsistence uses, Federal subsistence regulations require that rural Alaska residents live in a community or area that has C&T for the desired species and harvest area (50 CFR 100.5(b)). They also state that the NPS may further regulate eligibility to engage in subsistence on NPS-managed lands (50 CFR 100.5(d)).

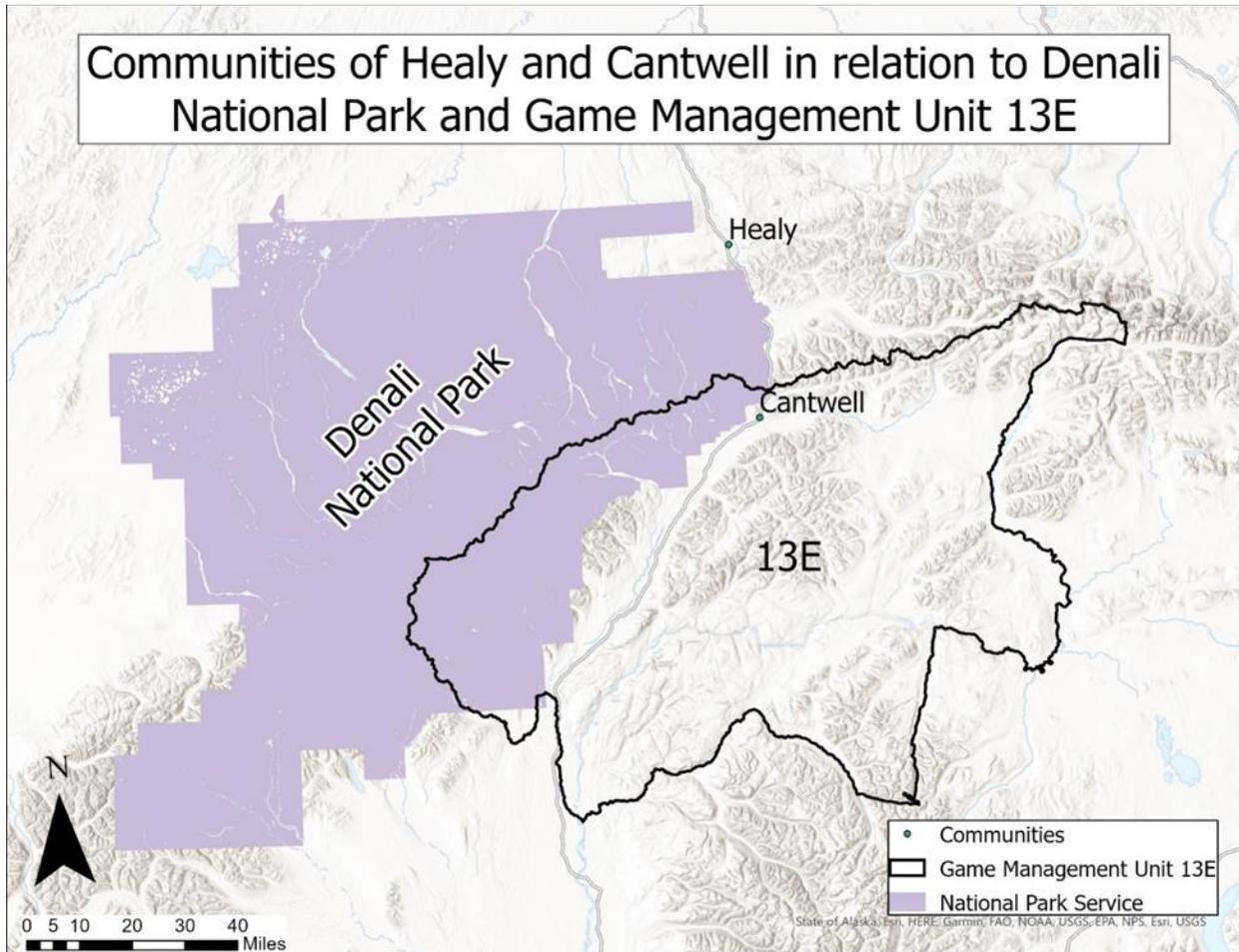
Kevin Mayo holds a National Park Service (NPS) subsistence use permit (13.440). Individuals residing outside of Denali National Park and Preserve's resident zone communities who have a personal or family history of using the Park additions established by ANILCA in 1980 for subsistence purposes at the time ANILCA was passed, may obtain a special subsistence use permit (36 CFR 13.440). They must provide documentation of their traditional 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 (NPSb 2010).

According to NPS regulations, to qualify as a local rural resident eligible to engage in subsistence uses within a National Park or National Monument, a person must live in a resident zone community, live within the boundaries of the park or monument, or hold a 13.440 subsistence eligibility permit (36 CFR 13.420, 430). If a person qualifies as a local rural resident as described in the previous sentence, but lives in a community or area without a C&T for the species they wish to hunt or fish, they may submit a proposal to the Board for an individual C&T.

Federal subsistence regulations allow the Board to make individual decisions for C&Ts in NPS managed National Park and National Monument areas where subsistence is authorized, but not in Preserves. NPS regulations include unique subsistence eligibility requirements for NPS lands.

Fewer people have subsistence eligibility in National Parks and National Monuments as compared to other Federal public lands. Requests for individual C&Ts are analyzed in the same way that a community or area request for a C&T is analyzed (FSB 1999: 224).

Figure 1: Communities of Healy and Cantwell in relation to Denali National Park and Game Management Unit 13E



Existing Federal Regulation

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

36 CFR 13.410 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 the applicable special regulations 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.*

50 CFR 100.16 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—Caribou

Unit 13E Residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters).

Customary and Traditional Use Determination—Moose

Unit 13E Residents of Unit 13, Chickaloon, McKinley Village, Slana, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters).

Customary and Traditional Use Determination—Grouse

Unit 13 Residents of Units 11, 13, Chickaloon, 15, 16, 20D, 22 and 23.

Customary and Traditional Use Determination—Ptarmigan

Unit 13 Residents of Units 11, 13, Chickaloon, 15, 16, 20D, 22 and 23.

Proposed Federal Regulation

Customary and Traditional Use Determination—Caribou

*Unit 13E Residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, **Kevin Mayo and members of his household**, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters).*

Customary and Traditional Use Determination—Moose

*Unit 13E Residents of Unit 13, Chickaloon, McKinley Village, Slana, **Kevin Mayo and members of his household**, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters).*

Customary and Traditional Use Determination—Grouse

Unit 13 Residents of Units 11, 13, Chickaloon, Kevin Mayo and members of his household, 15, 16, 20D, 22 and 23.

Customary and Traditional Use Determination—Ptarmigan

Unit 13 Residents of Units 11, 13, Chickaloon, Kevin Mayo and members of his household, 15, 16, 20D, 22 and 23.

Extent of Federal Public Lands

Unit 13E is comprised of approximately 23% Federal public lands and consists of 19% NPS and 4% Bureau of Land Management (BLM) managed lands.

Background

The community of Cantwell is located near the Alaska Range at the confluence of the Parks and Denali highways, which is north of Broad Pass and 28 miles south of Denali National Park and Preserve. The area is characterized by a continental climate with warm summers and cold, dark winters with an annual average snowfall of 78 inches and 15 inches of precipitation.

Traditional Ahtna territory centers on the Copper River Basin but also includes parts of the Susitna and upper Tanana drainages. Historically, Ahtna Athabaskans seasonally occupied areas to the east of the current village of Cantwell at Valdez Creek. In this area, caribou, moose, porcupine, migratory and upland birds, and berries continued to be harvested by local subsistence users.

Within Denali National Park, Cantwell subsistence users harvest moose and caribou on the southwest boundary just outside the designated Denali Wilderness. This area, where subsistence hunting is permitted under the federal program, is referred to by local subsistence users as the Cantwell Traditional Use Area (Holen et al 2014:36, 58).

Regulatory History

Requests for individual C&Ts began almost as soon as the 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 C&T proposals were held up for years because of a huge backlog of proposals for community C&Ts and lack of clarity as to whether individual C&Ts were within the purview of the Board (Norris 2002: 229-232). In 1999, the Board finally addressed several proposals for individual C&Ts. 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 three individual C&Ts 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). In 2010 and 2021, the Board approved additional individual C&Ts for Kevin Mayo of Healy (WP10-31) and Blaine Mayo (ICP21-01), respectively.

In January 2021 the Board adopted a revised policy on individual C&Ts to follow the procedures described in the NPS “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 provides for concurrent application for 13.440 Subsistence Eligibility Permits. Subsequently under this new policy, Blaine Mayo of Healy submitted Proposal ICTP21-01, which requests an individual C&T for moose in Unit 13E for himself, his wife, and children (NPS 2021). The Board approved this request during its August 2021 work session (FSB 2021).

Eight Factors for Determining Customary and Traditional Use

A community or area’s customary and traditional use is generally exemplified through these eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) 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; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) 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 the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these 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 some or all of 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.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process, and present recommendations for regulatory changes. In June 2016, the Board clarified that the eight-factor analysis applied when considering customary and traditional use determinations is intended to protect

subsistence use, rather than limit it. The Board stated that the goal of the customary and traditional use determination analysis process is to recognize customary and traditional uses in the most inclusive manner possible.

Integrated Discussion of the Eight Factors

Since 1964, the Cotter/Smith/Mayo families have hunted, harvested, and shared moose, caribou, grouse, and ptarmigan. According to Kevin Mayo, the family harvests moose, and caribou in late August and the first weekend in September before the meat gets ratty after the weather cools. Kevin Mayo feels that it is hard to justify harvesting caribou in the winter because caribou are too lean but most importantly for him, he does not feel it is a fair or ethical hunt. Caribou are under stress from winter weather and lack of food. During moose and caribou season, the Mayo family will also hunt grouse and ptarmigan from their hunting camp.

Historically the Cotter/Smith/Mayo families traveled to their hunting/trapping areas by foot, Coots, Weasels, off road vehicles (ORVs), and snowmachines. Today, Kevin Mayo's family continues to maintain a reoccurring pattern of use within the area by foot, ORVs and snowmachines. Once the family sets up their hunting camp, they walk about two miles to a hill where they sit and spot for animals with binoculars. Once they spot an animal, they walk to within shooting distance. After they shoot the animal (generally located within the New Park), they pack it out by foot to a designated ORV trail to camp.

Since 1971, the Mayo family has hunted in the area and in 1985 they established their current hunting camp. The Mayo family used to assemble and disassemble their tent every hunting season; however, about 15 years ago they built a permanent tent platform. The extended family prefers to hunt close to their camp. Typically, the Cotter/Smith/Mayo families remain at their camp until they harvest a moose. While hunting for moose, the family also opportunistically hunts for caribou, grouse, and ptarmigan.

For over four generations the Smith/Cotter/Mayo families have hunted and harvested animals by reasonable ground access in areas near their residence within Unit 13E. Kevin Mayo's extended family hunts moose, caribou, grouse, and ptarmigan together every hunting season in the Cantwell Creek and Foggy Pass area. The Mayo family's camp borders the New Park and is located on state land. To access the camp, the Mayo family uses ORVs and walks. According to Kevin, the family knows the area like the back of their hands.

Moose and caribou are gutted, skinned, and quartered in the field and then packed by foot to a designated ORV trail and transported to camp. The Mayo family uses all edible parts of the moose and caribou. Much of the moose and caribou meat is canned or stored in the freezer for preservation and some portions of the moose and caribou are processed by drying. Kevin uses the same handling techniques that he was taught by his father, grandfather, and great grandfather. Usually, the combination of a moose and a caribou will feed two to three families per year. The Mayo family uses the following methods for processing meat: vacuum sealer, smoker, meat grinder, pressure cooker, and sausage stuffer. Processing meat is a family event. Grouse and ptarmigan are brought back to camp and cleaned and immediately consumed. The breast is eaten by the family after marinating and grilling it over the campfire.

Knowledge, skills, and the use of hunting areas are passed from generation to generation. Kevin Mayo's grandparents learned how to hunt in the Cantwell areas and passed this knowledge on to their extended family. As a young child, Kevin Mayo accompanied his father, mother, and other relatives hunting and trapping, long before he was old enough to hunt and trap himself.

Kevin has hunted and trapped every year since 1982. He learned from his mom and dad, grandparents, and friends how to hunt, fish, trap, preserve, and process meat. Kevin continues these traditions by passing them on to his wife and children. Hunting, trapping, berry picking, and fishing are subsistence activities the Mayo family is dependent upon. Subsistence for the Mayo family is a family activity, and the next generation is learning these practices as well.

The most important aspect of grouse and ptarmigan hunting is that it provides an opportunity to introduce hunting to the kids. This activity is often overlooked in that it introduces kids the skills and knowledge of subsistence. Kids can practice aiming the .22 rifle and become familiar with using a gun. Grouse and ptarmigan hunting is one of the highlights for the kids, providing them with an immense amount of pride when they can provide food for the family while at camp.

Below is an excerpt from a joint interview with Blaine and Kevin Mayo on August 15, 2022.

"We have learned a lot over the years from hunting with our parents, each other, and our friends. We are never ones to push the knowledge that we have onto anyone saying our way is the only way, but we are always one for sharing whatever knowledge we 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.

Bird hunting is another huge part of our 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 have 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. Our kids love to go out to hunting. Moose camp and our winter camp is always on our 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 to our kids what we've learned from our parents and family. And they still learn from my parents and family, it's a beautiful thing!

As far as fishing goes, again, we've learned a lot from our parents, each other, our sister, and our grandparents. One of our more favorite fish are burbot. We try to pass on our fishing knowledge to our friends. Grayling, lake trout, salmon and other fish are always a blessing to have in the freezer or better yet on the plate. 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."

The Mayo family hunts are a family event, often including several generations who participate together in activities such as hunting, establishing camps, and processing harvested meat. Extended family members always share in the harvest. It is the Mayo's family tradition to share meat and equipment. If a family member or friend does not get enough meat during the season it is expected that the Mayo family will share their harvest with that person or household. For

example, Kevin's mom always shares moose and caribou meat with her sister, mother, and elders.

Kevin Mayo's great grandparents passed down their traditional subsistence lifestyle to their extended 5th generational family. It is this traditional subsistence lifestyle that Kevin Mayo wants to continue to pass on to his wife and children. Typically, the extended family harvests one moose per hunting season. The family never takes more than one moose or two caribou as a family per hunting season.

Moose has been and continues to be Kevin Mayo's family primary source of meat. The family utilizes a variety of subsistence resources such as berries, caribou, bear, ptarmigan, fish, and furbearers such as beaver, marten, fox, wolf, and lynx. In addition to wildlife, berries, and fish provide a substantial nutritional gain for the family. The subsistence activities also provide a significant social and family function involving all members of the multiple Mayo households. Multiple generations will participate in the fall, winter, and spring hunting, trapping, fishing, and processing activities together. Approximately fifty percent of the Mayo family's meat comes from moose. Typically, wildlife and other subsistence foods provide meals four out of seven days per week. The Mayo family enjoys eating moose, caribou, brown bear, grouse, and ptarmigan meat because it is low in fat, and it is traditionally harvested.

Hunting is a way of life for the Mayo family. They like to know where their meat comes from and how it was handled. They like to eat organic foods as much as possible and the animals they harvest are such. They fish, hunt, trap, harvest berries, and cut down firewood to provide for their family. Their subsistence way of life has been handed down through the generations and it is ingrained in their family's lives. Kevin Mayo feels that it is a blessing to have been raised in Cantwell and to have had the parents and grandparents he has had.

Effects of the Proposal

If adopted, this proposal would recognize Kevin Mayo and his household family's C&T use of moose, caribou, grouse, and ptarmigan in Unit 13E in areas managed by Denali National Park and Preserve where subsistence uses are allowed and would allow Mr. Mayo to pass his traditional subsistence lifestyle to his children. Because this C&T determination is for one household who has a history of moose, caribou, grouse, and ptarmigan in the area, the effects on other subsistence users should be minimal.

NPS CONCLUSION

Support Proposal ICTP23-02.

Justification

The proponents exhibit a clear long-term and consistent use of moose, caribou, grouse, and ptarmigan in Unit 13, in areas managed by Denali National Park and 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 and 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 wide diversity of wild foods that provide this family with cultural, economic, social, and nutritious benefits. All eight of the factors associated with C&T use are evident. Furthermore, this family's pattern of use is also evident through the Board's previous determination for Kevin Mayo for moose and caribou. There is substantial evidence to support the issuance of an individual C&T determination for moose, caribou, grouse, and ptarmigan within Unit 13 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.

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Personal communication in person with Kevin and Blaine Mayo by Amy Craver, Subsistence Coordinator, Denali National Park and Preserve. August 15, 2022.

**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?

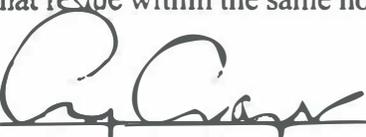
The analysis should include an integrated discussion of the eight factors. A factor-by-factor discussion is not required in the analysis and it is also not necessary that all eight factors be addressed to demonstrate a pattern of use. The eight factors provide a framework for examining the pattern of 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):

- 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:  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 Breanna 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

From: Mcdavid, Brooke M <brooke_mcdavid@fws.gov>
Sent: Tuesday, March 7, 2023 1:10 PM
To: Craver, Amy J <Amy_Craver@nps.gov>
Cc: Patton, Eva <eva_patton@nps.gov>; Jochum, Kim A <kim_jochum@nps.gov>; Wessels, Katerina <katerina_wessels@fws.gov>
Subject: EIRAC Recommendations for ICTP23-01 and -02

Hi Amy,

For your record, here is documentation of the EIRAC recommendation for ICTP23-01 and ICTP23-02:

The Eastern Interior Alaska Subsistence Regional Advisory Council unanimously supported Denali National Park and Preserve Individual Customary and Traditional Use Determination Proposals ICTP23-01 (Blaine Mayo) and ICTP23-02 (Kevin Mayo) at their Council meeting on March 2, 2023 in Fairbanks. In their justification the Council referenced the comments provided by the Denali Subsistence Resource Commission and the NPS conclusions, both of which were in support of the proposals. The Council felt that the proposal analyses completed and presented by NPS were thorough and the Council agrees that long-term and consistent patterns of use have been demonstrated by the Mayo brothers.

Please let me know if you have any questions.

Best,

Brooke

Amy Craver
Subsistence Manager/Cultural Anthropologist
Denali National Park and Preserve
907-342-2877

From: Gill, Jessica A <jessica_gill@fws.gov>
Sent: Monday, June 12, 2023 9:45 AM
To: Craver, Amy J <Amy_Craver@nps.gov>
Subject: RE: SCRAC Recommendations for ICTP23-01 and -02

Hi Amy,

Denali National Park and Preserve Individual C&T Analyses

Ms. Amy Craver, Subsistence Coordinator/Cultural Anthropologist, presented two individual customary and traditional use requests for Denali National Park and Preserve: ICTP 23-01 and ICTP 24-01. Member Opheim motioned to support both proposals, Member McLaughlin seconded. The motion passed unanimously. The Council supported these two proposals because they would benefit subsistence users and would not unnecessarily restrict other users and there are no conservation concerns.

Thank you!
Jessica

Jessica Gill (she/her)
Subsistence Council Coordinator
Office of Subsistence Management
U.S. Fish and Wildlife Service
907-310-6129 (cell)

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

**INDIVIDUAL CUSTOMARY AND TRADITIONAL USE DETERMINATION
RAC RECOMMENDATION**

To be completed by the relevant Subsistence Coordinator:

Date of Formal Action: 4/5/2023

Proponent Name: Kevin Mayo and Household

Proponent Request: ICTP23-02

Affected RAC: Western Interior

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

- There is sufficient evidence to support an individual customary and traditional use determination for (name) for (species) in (unit(s)/subunit(s))
- There is NOT sufficient evidence to support an individual customary and traditional use determination for (name) for (species) in (unit(s)/subunit(s))

Brief justification for above decision:

The Council does not believe that they have C&T for the specific area that the applicants are requesting an Individual C&T Use Determination on, and defers to the EIRAC and SCRAC, which have supported this request.

Signature of RAC Chair or Designee _____
Date 4/13/2023 _____

