

WSA24-02/03 Executive Summary

<p>General Description</p>	<p>Temporary Wildlife Special Action WSA24-02 requests closing the Federal caribou hunts on the Nelchina caribou herd in Units 11, 12 remainder and 13 to all users for the 2024/25 regulatory year. It also request an ANILCA §804 user prioritization analysis be conducted for the NCH. <i>Submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission.</i></p> <p>Temporary Wildlife Special Action WSA24-03 closing the Federal caribou hunts on the Nelchina caribou herd in Units 11, 12 remainder and 13 to all users for the 2024/25 regulatory year. It also request an ANILCA §804 user prioritization analysis be conducted for the NCH. <i>Submitted by the Bureau of Land Management Glennallen Field Office.</i></p>
<p>Proposed Regulation</p>	<p style="text-align: center;">Unit 11–Caribou</p> <p>1 bull by Federal registration permit May be announced.</p> <p><i>Federal public lands are closed to the take of caribou by all users for the 2024/25 regulatory year.</i> <i>No open season.</i></p> <p style="text-align: center;">Unit 12–Caribou</p> <p><i>Unit 12, that portion within the Wrangell-St. Elias National Park that lies west of the Nabesna River and the Nabesna Glacier. All hunting of caribou is prohibited on Federal public lands.</i> <i>No open season.</i></p> <p><i>Unit 12, that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 bull by Federal registration permit only. Federal public lands are closed to the harvest of caribou except by federally qualified subsistence users hunting under these regulations.</i> <i>Aug. 10–Sep. 30.</i></p> <p>Unit 12, remainder—1 bull Sep. 1–20.</p> <p>Unit 12, remainder—1 caribou may be taken by a Federal registration permit during a winter season to be Winter season to be announced.</p>

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	<p><i>announced. Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by the Tetlin National Wildlife Refuge Manager in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee</i></p> <p><i>Federal public lands are closed to the take of caribou by all users for the 2024/25 regulatory year.</i></p> <p>Unit 13–Caribou</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 70%;"><i>Units 13A and 13B—2 caribou by Federal registration permit only (FC1302).</i></td> <td style="width: 30%;"><i>Aug. 1–Sep. 30</i></td> </tr> <tr> <td></td> <td style="text-align: right;"><i>Oct. 21–Mar. 31</i></td> </tr> <tr> <td><i>Federal public lands are closed to the take of caribou by all users for the 2024/25 regulatory year.</i></td> <td style="text-align: right;"><i>No open season.</i></td> </tr> </table> <table style="width: 100%; border: none; margin-top: 10px;"> <tr> <td style="width: 70%;"><i>Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)</i></td> <td style="width: 30%;"><i>Aug. 1–Sep. 30</i></td> </tr> <tr> <td></td> <td style="text-align: right;"><i>Oct. 21–Mar. 31</i></td> </tr> <tr> <td></td> <td style="text-align: right;"><i>No open season.</i></td> </tr> </table>	<i>Units 13A and 13B—2 caribou by Federal registration permit only (FC1302).</i>	<i>Aug. 1–Sep. 30</i>		<i>Oct. 21–Mar. 31</i>	<i>Federal public lands are closed to the take of caribou by all users for the 2024/25 regulatory year.</i>	<i>No open season.</i>	<i>Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)</i>	<i>Aug. 1–Sep. 30</i>		<i>Oct. 21–Mar. 31</i>		<i>No open season.</i>
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<p>OSM Conclusion</p>	<p>Support Wildlife Special Action WSA24-02 with modification to provide an exception for traditional religious ceremonies and cultural/educational program permit harvest and to postpone a decision on the ANILCA §804 user prioritization analysis to the February 2025 Board Fisheries Regulatory meeting through Wildlife Proposal WP25-01.</p> <p>Take No Action on WSA24-03.</p>												

STAFF ANALYSIS
TEMPORARY SPECIAL ACTION
WSA24-02/03

ISSUES

Temporary Wildlife Special Action WSA24-02, submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission (WRST SRC), and WSA24-03, submitted by the Bureau of Land Management Glennallen Field Office (BLM Glennallen FO), request the Federal Subsistence Board (Board) close the Federal caribou hunts on the Nelchina caribou herd (NCH) in Units 11, 12 remainder, and 13 to all users for the 2024/25 regulatory year. Both proponents also request an Alaska National Interest Lands Conservation Act (ANILCA) §804 user prioritization analysis be conducted for the NCH.

DISCUSSION

The WRST SRC requests closing Federal public lands to the harvest of caribou due to a significant population decline over the last 3 years. They are concerned about the status of the herd and realize it may take a long time for them to recover. If this closure is enacted, it would affect their continuation of customary and traditional subsistence uses, so they are also requesting the §804 analysis be conducted, which would identify the communities that are most dependent on the NCH so when a harvestable surplus is available a limited subsistence hunt may occur.

The BLM Glennallen FO requests closing the same hunts for all users for the 2024/25 regulatory year as well as conducting an ANILCA §804 user prioritization analysis. They state the most recent population metrics are concerning because they are even lower than prior estimates when the NCH hunts were closed due to conservation concerns. The October 2023 estimate from Alaska Department of Fish and Game (ADF&G) was 7,800 animals, which is lower than the July 2023 estimate of 8,823, both of which are well below the ADF&G management objective of 35,000–40,000 caribou. The composition ratios of 25 bulls:100 cows and 3 calves:100 cows are also below the management objectives of 40 bulls:100 cows and 40 calves:100 cows and are very concerning. Severe weather conditions during the winters of 2021/22 and 2022/23 caused high overwinter mortality of both adults and calves, leading to a reduction in the overall population and lower than expected spring recruitments. Observed productivity of the herd has not been sufficient for population growth since 2021. Based on the most recent data, ADF&G determined there was no harvestable surplus available for the 2024/25 season and did not offer the Tier I registration or any drawing hunts for any user group. The proponent additionally states that an ANILCA §804 subsistence user prioritization determination will be needed once there is harvestable surplus available. This analysis will be necessary so a limited number of communities can continue customary and traditional uses of caribou.

The applicable Federal regulations for Temporary Special Actions are found in 36 CFR 242.19(b) and 50 CFR 100.19(b) and state that:

. . . After adequate notice and public hearing, the Board may temporarily close or open public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for subsistence take, or close public lands for the taking of fish and wildlife for nonsubsistence uses, or restrict take for nonsubsistence uses.

The applicable Federal regulations for Determining priorities for subsistence uses among rural Alaska residents (§804 analyses) are found in 26.CFR 242.17 and 50 CFR 100.17 and state:

(a) Whenever it is necessary to restrict the subsistence taking of fish and wildlife on public lands in order to protect the continued viability of such populations, or to continue subsistence uses, the Board shall establish a priority among the rural Alaska residents after considering any recommendation submitted by an appropriate Regional Council.

Existing Federal Regulation

Note: These are the 2024-2026 Federal regulations adopted by the Board at their meeting in April 2024. The codified regulations for Unit 13 caribou will become effective July 1, 2024, or after the final rule is published in the Federal Register.

Unit 11–Caribou

1 bull by Federal registration permit

May be announced.

Unit 12–Caribou

Unit 12, remainder—1 bull

Sep. 1–20.

Unit 12, remainder—1 caribou may be taken by a Federal registration permit during a winter season to be announced. Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by the Tetlin National Wildlife Refuge Manager in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee

Winter season to be announced.

Unit 13–Caribou

Units 13A and 13B— up to 2 caribou by Federal registration permit only (FC1302)

Aug. 1–Sep. 30

Oct. 21–Mar. 31

Unit 13, remainder—2 bulls by Federal registration permit only (FC1302) Aug. 1–Sep. 30

Oct. 21–Mar. 31

Proposed Federal Regulation

Unit 11–Caribou

~~1 bull by Federal registration permit~~

*~~May be announced.
No open season.~~*

Federal public lands are closed to the take of caribou by all users for the 2024/25 regulatory year.

Unit 12–Caribou

Unit 12, remainder—1 bull

~~Sep. 1–20. No open season.~~

Unit 12, remainder—1 caribou may be taken by a Federal registration permit during a winter season to be announced. Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by the Tetlin National Wildlife Refuge Manager in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee

~~Winter season to be announced.~~

Federal public lands are closed to the take of caribou by all users for the 2024/25 regulatory year.

Unit 13–Caribou

Units 13A and 13B—2 caribou by Federal registration permit only (FC1302)

~~Aug. 1–Sep. 30~~

~~Oct. 21–Mar. 31 No open season.~~

Federal public lands are closed to caribou hunting by all users for the 2024/25 regulatory year.

Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)

Aug. 1–Sep. 30

Oct. 21–Mar. 31 No

Federal public lands are closed to the take of caribou by all users for the 2024/25 regulatory year. *open season.*

Relevant Federal Regulation

50 CFR 100.17 Determining priorities for subsistence uses among rural Alaska residents.

(d) In addressing a situation where prioritized allocation becomes necessary, the Board shall solicit recommendations from the Regional Council in the area affected.

Existing State Regulation

Unit 11–Caribou

No State season

Unit 12–Caribou

Residents – that portion west of the Glenn Highway (Tok cutoff) and south of the Alaska Highway within the Tok River drainage—1 bull *HT* *Sep. 1–Sep. 20*

Residents – that portion west of the Glenn Highway (Tok cutoff) and south of the Alaska Highway, excluding the Tok River drainage (Macomb Herd)—1 bull *RC835* *Aug 10–Aug 27*

Residents and Nonresidents – Unit 12 remainder *No open season*

Unit 13–Caribou

Note: ADF&G did not offer registration or subsistence permits during the fall 2023 application period, effectively closing the season without an Emergency Order (EO).

Residents – One caribou by permit per household, available only by application. See Subsistence Permit Hunt Supplement for details RC561 *No open season.*

Residents – One caribou by permit per household, available only by application. See Subsistence Permit Hunt Supplement for details RC562 *No open season.*

Residents – One caribou by permit per household, available only by application. See the Subsistence Permit Hunt Supplement for details CC001 *No open season.*

Nonresidents *No open season.*

Extent of Federal Public Lands

Unit 11 is comprised of approximately 87% Federal public lands and consists of 84% National Park Service (NPS) managed lands and 3% U.S. Forest Service (USFS) managed lands (**Figure 1**).

Unit 12 is comprised of approximately 60% Federal public lands and consists of 48% NPS managed lands, 11% US Fish and Wildlife Service (USFWS) managed lands, and 1% BLM managed lands (**Figure 1**).

Unit 13 is comprised of approximately 13% Federal public lands and consists of 6% NPS managed lands, 5% BLM managed lands, and 2% U.S. Forest Service (USFS) managed lands (**Figure 1**).

Federal public lands within Denali National Park, as it existed prior to the passage of Alaska National Interest Lands Conservation Act (ANILCA) in December 1980, are closed to all hunting and trapping. Federal public lands within the ANILCA additions to Denali National Park, as well as Federal public lands within Wrangell-St. Elias National Park, are closed to hunting and trapping except to resident zone communities and those households holding subsistence use permits issued under 36 CFR 13.440.

BLM manages additional lands within Unit 13 that are selected for conveyance by the State of Alaska or Native Corporations and are not currently available for Federal subsistence because of the land selection status. If these land selections are relinquished, they would become Federal public lands under the authority of Title VIII of ANILCA.

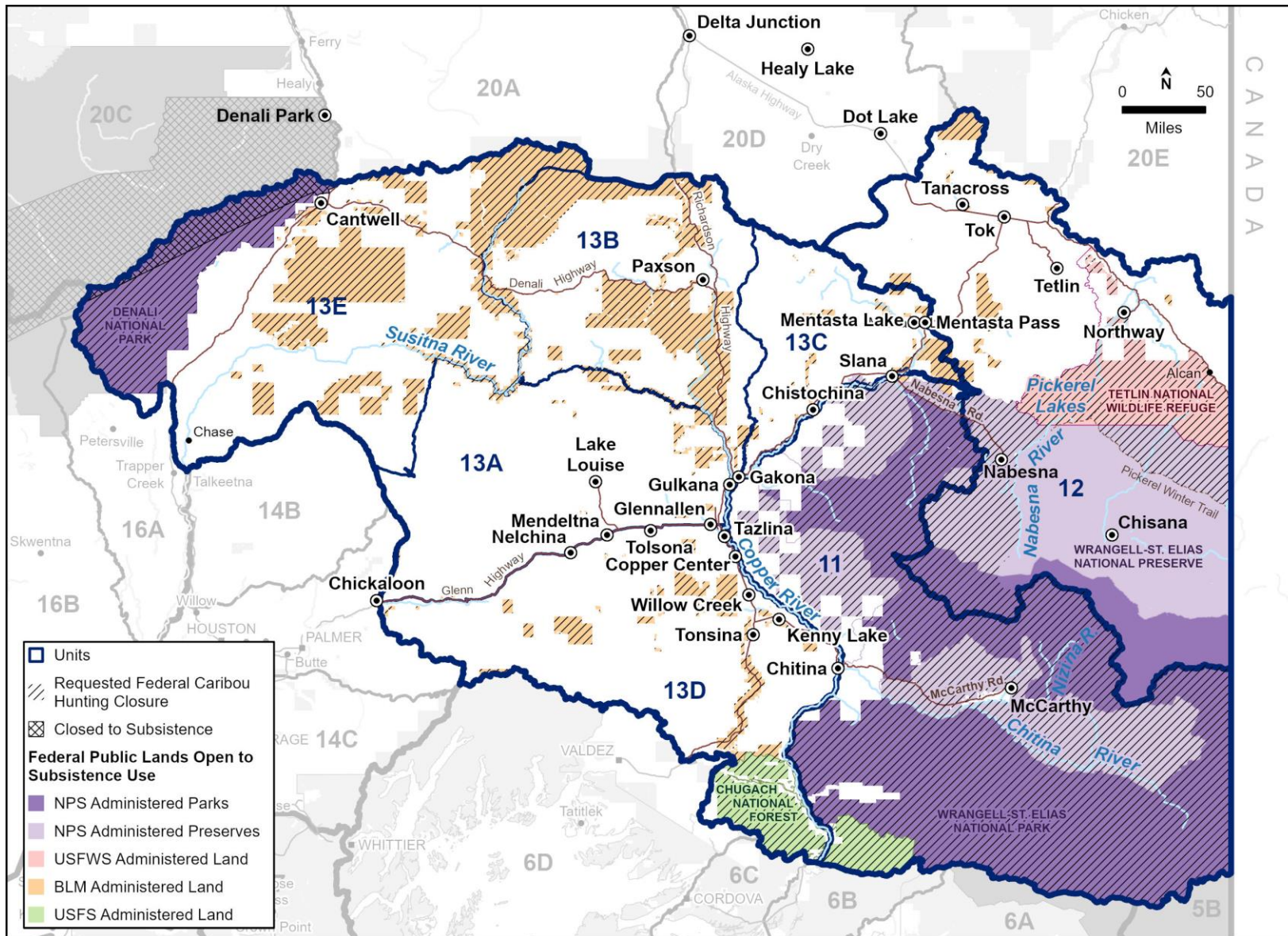


Figure 1. Federal public lands included in the requested Nelchina caribou hunting closures in Units 11, 12, and 13.

Customary and Traditional Use Determinations

Unit 11

Residents of Units 11, 12, 13A–D, Chickaloon, Healy Lake, and Dot Lake have a customary and traditional use determination for caribou in Unit 11, north of the Sanford River.

Residents of Units 11, 13A–D, and Chickaloon have a customary and traditional use determination for caribou in Unit 11, remainder.

Unit 12

Residents of Unit 12, Chistochina, Dot Lake, Healy Lake, and Mentasta Lake have a customary and traditional use determination for caribou in Unit 12.

Unit 13

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, 20D (excluding residents of Fort Greely), and Chickaloon have a customary and traditional use determination for caribou in Unit 13B.

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, Chickaloon, Dot Lake, and Healy Lake have a customary and traditional use determination for to harvest caribou in Unit 13C.

Residents of Units 11, 12 (along the Nabesna Road), 13, and Chickaloon have a customary and traditional use determination to harvest for caribou in Unit 13A and 13D.

Residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, and the area along the Parks Highway between mileposts 216-239 (excluding the residents of Denali National Park Headquarters) have a customary and traditional use determination to harvest caribou in Unit 13E.

National Park Service Resident Zones

Only people living within a national park or monument, people living in resident zone communities and those households holding subsistence use permits issued under 36 CFR 13.440 can hunt in national parks and monuments. The resident zone communities for Wrangell-St. Elias National Park are: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway/Northway Village/Northway Junction, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and Yakutat.

The resident zone communities for Denali National Park are Cantwell (limited to the area within a 3-mile radius of the Cantwell post office as shown on a map available at the park visitor center), Minchumina, Nikolai, and Telida.

Regulatory History

The following regulatory history is abbreviated for the purposes of this temporary special action. A full description of Federal and State regulatory actions relevant to the NCH can be found in the OSM analysis of Wildlife Proposal WP24-09 (OSM 2023a).

The NCH is an important resource for many rural and non-rural users. Its proximity to the Glenn and Richardson highways enhances accessibility of the NCH to Anchorage and Fairbanks residents (Tobey 2003). A State Tier II system for NCH harvest was established in 1990 for Unit 13.

Between 1998 and 2008, the Board adjusted seasons, harvest limits, and opportunities to hunt on Federal public lands dependent on regulatory proposals, requests from the public, and herd assessment by managers. Season length and harvest limits changed in concert with the population estimates of the NCH. When population metrics allowed for additional harvest, requests were adopted to allow for more Federal harvest.

In 2009, the Board of Game (BOG) eliminated the State Tier II hunt but added two new hunts: a Tier I hunt and a Community Harvest hunt for residents of Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Copper Center. The harvest limit for each was one caribou (sex to be announced annually) with season dates of Aug. 10–Sep. 20 and Oct. 21–Mar. 31 and a harvest quota of 300 caribou, each. A federally qualified subsistence user could opt into the State community harvest system or use a State registration permit to harvest one caribou under State regulations and then get a Federal permit to harvest an additional caribou within Unit 13 since the Federal harvest limit was two caribou. However, State regulations stipulate that Tier I and community harvest system permit holders may not hunt moose or caribou under State or Federal regulations outside of Unit 13 and the Copper Basin Community Hunt area, respectively (ADF&G 2019a).

In 2012, the Board adopted Wildlife Proposal WP12-25, which added an additional nine days to the beginning of the fall caribou season in all of Unit 13 to provide more opportunity to federally qualified subsistence users. The season was extended from Aug. 10–Sep. 30 to Aug. 1–Sep. 30 (OSM 2012).

Between 2016 and 2019, the Board and ADF&G both acted to expand hunting opportunity of the NCH as populations reached the upper end of management objectives. Special actions were approved to extend seasons and increase harvest limits.

In 2018, Wildlife Proposal WP18-19 was submitted by the Ahtna Intertribal Resource Commission (AITRC) requesting they be allowed to distribute Federal registration permits to Ahtna tribal members for the Federal caribou season in Unit 13. In addition, the proponent requested that the Ahtna Advisory Committee (which was to be formed) be added to the list of agencies and organizations consulted by the BLM Glennallen Field Office Manager, when announcing the sex of caribou taken in Units 13A and 13B each year. The Board voted to defer WP18-19 pending development of a framework for a community harvest system (OSM 2018).

In July 2019, the Board rejected Wildlife Special Action WSA19-03, which requested closure of Federal public lands in Unit 13 to caribou and moose hunting by non-federally qualified users for the 2019/20 season. The Board determined a closure was not warranted for conservation, continuation of subsistence uses, or safety reasons, as these populations were routinely monitored, and annual biological data was used to inform management plans and to establish sustainable harvest guidelines. Federal harvest rates remained consistent compared to annual overall harvest rates and the Board believed the closure would not alleviate public safety concerns as non-federally qualified users would still be able to cross Federal public lands to access State and private lands.

In 2020, the Board adopted several proposals and special actions affecting caribou in Unit 13. First, in April the Board adopted deferred proposal WP18-19 with modification, establishing a community harvest system for moose and caribou in Unit 13.

In July 2020, the Board acted on two Wildlife Special Action requests regarding caribou hunting in Unit 13, WSA20-01 and WSA20-03. WSA20-01 requested a continuous caribou season in Unit 13 from Aug. 1-Mar. 31 and that the harvest limit in Unit 13, remainder be changed from two bulls to two caribou for the 2020/21 and 2021/22 seasons. The Board approved the change in harvest limit to provide additional subsistence opportunity because there was no conservation concern. However, they did not approve the continuous season due to concerns of harvesting bulls during the rut when they may be unpalatable. This action was consistent with the Southcentral Alaska and Eastern Interior Alaska Subsistence Regional Advisory Councils' (Council) recommendations.

WSA20-03 requested closure of Federal public lands in Unit 13 to the hunting of moose and caribou by non-federally qualified users for the 2020/21 season. The Board approved closure of Federal public lands in only Units 13A and 13B to moose and caribou hunting by non-federally qualified users for the 2020/21 and 2021/22 seasons. The Board supported the closure for reasons of public safety and continuation of subsistence uses. The Board limited the closure to Units 13A and 13B because this is the area where the most overcrowding, disruption of hunts, and serious safety concerns have occurred. The Board extended the special action to the 2021/22 season as a regulatory proposal would not become effective until July 1, 2022, which reduced the administrative burden associated with processing additional requests.

Also in July 2020, the Board approved Wildlife Special Action WSA20-02 with modification regarding the AITRC administered community harvest system. In April 2022, the Board adopted Wildlife Proposal WP22-36, which codified these temporary regulations.

In 2022, the Board adopted Wildlife Proposal WP22-35 which established a may be announced season on the NCH in Unit 11 with a harvest limit of one bull by federal registration permit. This proposal also delegated authority to the superintendent of Wrangell-St. Elias National Park and Preserve to announce season dates, harvest quotas and number of permits, define harvest areas and to open and close the season. This season was established because the NCH migrates through Unit 11, and this hunt could allow for some subsistence harvest opportunity within the unit. Although precautions needed to be taken, as this area was closed to the harvest of caribou to protect the Mentasta Caribou Herd which is experiencing conservation concerns. To date, this season has not been announced.

In 2022, ADF&G took action to lessen a steep decline in the NCH population by changing harvest limits. Severe winter conditions resulted in a low population estimate with a lower-than-expected harvestable surplus. ADF&G established the resident caribou harvest limit in Unit 13 as one bull, with a harvest quota of 1,000 bull caribou (615 allocated to State harvest and 385 for Federal harvest). These low harvest quotas led to both State registration hunts being closed by EO when quotas were exceeded. ADF&G requested the BLM in-season manager restrict harvest under Federal regulations to bulls only, which the manager opted not to do.

On June 30, 2023, the State announced the closure of all NCH hunts for the 2023/24 season via EO R4-01-23. This EO closed the two Tier I registration hunts (RC561 and RC562) and the community subsistence hunt (CC001). The resident youth hunt (YC495) and resident drawing hunt (DC485) were not offered during the drawing application period of 2022 (ADF&G 2022), as ADF&G determined the NCH population was too low to offer these opportunities.

Starting in July 2023, the Board acted on several special action requests regarding caribou in Unit 13. Adoption of WSA23-01/03 closed all caribou hunting during the fall season in Unit 13. WSA23-01 was submitted by ADF&G and WSA23-03 was submitted by the BLM. In October, adoption of WSA23-04 with modification, submitted by the BOG, closed the winter caribou hunts in Units 11, 12, and 13. WSA23-02 was submitted by ADF&G at the same time, but was not acted upon due to WSA23-04 being more inclusive of NCH harvest areas. All of these requests asked to close the hunts due to substantial conservation concerns over low NCH population estimates. The Board modified WSA23-04 to provide an exception for traditional religious ceremonies and cultural/educational program permit harvest.

In April 2024, the Board adopted Wildlife Proposal WP24-09, which delegated authority to the BLM Glennallen FO manager to manage the Federal caribou hunts in Units 13A and 13B and added AITRC to the list of entities for consultation via a delegation of authority letter. It also changed the Units 13A and 13B harvest limits from “two caribou” to “up to two caribou.” Adoption of WP24-09 expanded the in-season manager’s authority, allowing for greater management flexibility and more timely responses to changing hunt and herd conditions.

Current Events

The Office of Subsistence Management (OSM) submitted regulatory proposal, WP25-01 for the 2025 fisheries regulatory cycle (**Appendix 1**). The proposal requests changing all NCH hunts to may be announced seasons, delegating authority to Federal in-season managers to manage the NCH hunts and conducting a §804 user prioritization analysis for the NCH. OSM submitted this proposal outside of the normal wildlife regulatory cycle due to severe conservation concerns for the NCH coupled with the importance of caribou to local subsistence users. Conducting a §804 analysis as part of the fisheries regulatory cycle allows for Council recommendation as required by Federal regulation §100.17(d), provides more regulatory options and opportunity for public input, and enables more timely regulatory action rather than waiting an additional year for the wildlife regulatory cycle.

Public Hearing

The Office of Subsistence Management held a public hearing for these special action requests on May 1, 2024, by teleconference. Two people testified, and both were in support of the closure. The first caller, a year-round resident of the Cantwell area on the Denali Highway and a federally qualified subsistence user in Unit 13, shared that when he first started living in the range of the Nelchina herd five years ago, he saw thousands of caribou per year, but in the last two years he has seen fewer than 100. He believes that a total closure is necessary until the herd recovers and is also in support of a Section 804 user prioritization, which should give preference to communities without a grocery store. The second caller represented the Alaska chapter of Backcountry Hunters and Anglers; the group supports the closure, recognizes rural subsistence challenges, and also supports exploration of user prioritization in the area.

Tribal Consultation

The Office of Subsistence Management held both a tribal and an Alaska Native Claims Settlement Act (ANCSA) corporation consultation for these special action requests on May 10, 2024, by teleconference. During the tribal consultation a representative with Ahtna Intertribal Resource Commission, described how tribal members harvest caribou from the NCH opportunistically when the animals migrate close to their area. She mentioned how caribou migration has been interrupted due to an increase in vehicle traffic due to an increase in human population. She expressed concern over the low number of caribou remaining on the landscape, comparing this population decline to one that occurred in the 1970s. She was concerned about the recovery time of the population, as the crash from the 1970s took fifteen years to recover fully. She also stated she felt this crisis could have been avoided by incrementally restricting harvest on the NCH, rather than the all-or-nothing approach that we are currently in. She did express hope in the fact that the BLM Glennallen Field Manager has recently been delegated authority to make in-season management decision regarding the NCH. She feels this is a positive step that could help slowly allow harvest by subsistence users when a surplus is available.

During the ANCSA corporation consultation held May 10, 2024, one caller from Northway Village testified. He described how village residents hunt caribou and how difficult it can be depending on whether the caribou are on State or Federal public lands. He mentioned how harvest of caribou, which has always been secondary to moose in harvest by locals, is currently less than it used to be, although he did not know why. Moose are very important to residents of Northway Village, with caribou usually taken when people are unable to harvest enough moose. He also voiced concerns over being able to take a caribou for a potlatch ceremony if harvest were still restricted on the NCH.

Biological Background

The NCH calving grounds and summer range lie within Unit 13. The rut also generally occurs within Unit 13 from late September through mid-October. About 60-95% of the NCH overwinters in Unit 20E, although Nelchina caribou also overwinter in Unit 12 and across northern portions of Units 11 and 13 (Schwanke and Robbins 2013). Winter competition with the Fortymile Caribou herd (FCH) in Unit 20E may be impacting the NCH and range conditions. While the calving season and location of the NCH

calving grounds remains static, use of other seasonal ranges varies with resource availability and snow cover (Schwanke and Robbins 2013).

State management goals and harvest objectives are based on the principle of sustained yield (Robbins 2015). Since the 1990s, ADF&G has aimed to maintain a fall, post-hunt population of 35,000–40,000 caribou, with minimum ratios of 40 bulls:100 cows and 40 calves:100 cows (Hatcher and Robbins 2021). The goal is to provide for the harvest of 3,000–6,000 caribou annually.

The State manages the NCH for maximum sustained yield, principally by annual adjustments in harvest quotas. The population of the NCH has fluctuated over time, influenced primarily by harvest (Schwanke and Robbins 2013). Between 2003 and 2023, the NCH summer and fall population estimates ranged from 6,983–53,500 caribou and averaged 36,896 caribou (**Figure 2**). The herd has exceeded State population objectives many times, and harvest regulations have been liberalized to quickly reduce the population in an effort to preserve habitat conditions. Population increases in the NCH may be attributable to reduced predator numbers as a result of the Intensive Management program to benefit moose in Units 12, 13, and 20 (Schwanke and Robbins 2013; ADF&G 2017, 2019a). The current predator control program was initiated in Unit 13 in 2000 (ADF&G 2023c). Activity under the program was suspended during 2012, 2015–2017, and 2019–2021, all coinciding with population estimates of the NCH at or above management objectives (ADF&G 2023c).

In October 2018, following a period of higher-than-expected population levels and associated liberalized harvest from 2010–2017, the NCH was estimated to be only 33,229, which is below the minimum State population objective (**Figure 2**). A combination of a liberal hunt, severe winter conditions in the eastern part of their range that resulted in high over-winter mortality, emigration of some animals to the FCH, and lower than anticipated productivity reduced the NCH from the 2017 fall estimate of 41,411 (Rinaldi pers. comm. 2019). In the summer of 2019, the NCH population estimate peaked at 53,500 caribou (ADF&G 2019b).

However, the NCH population estimate has declined precipitously since then to only 6,983 caribou in October 2023 (**Figure 2**), which is the lowest estimate since 2003 (ADF&G 2023a, 2023b). Factors contributing to this recent decline include deep snow across the range of the NCH during the winter from 2021–2024 which led to increased adult mortality. Spring thaw has also been occurring later, delaying green-up, migration, and calving, which has led to low calf recruitment over the past two seasons. Preliminary indicators suggest winter conditions during 2023–2024 have been milder, which may lead to greater over-winter survival. Smaller cohorts in 2021 and 2022 have the potential to slow population growth and recovery for the NCH as well (ADF&G 2023b).

Bull:cow and calf:cow ratios have fluctuated greatly over time. Between 2003 and 2023, the bull:100 cow ratio ranged from 23–64 bulls:100 cows and averaged 38 bulls:100 cows with the lowest estimate occurring in July 2023. Fall composition results were inconclusive, as the caribou were still sexually segregated during the survey, so the summer bull:cow ratio was used in the calculation of the fall population estimate (ADF&G 2024). The fall calf:100 cow ratio for the same timeframe ranged from 3–55 calves:100 cows and averaged 35 calves:100 cows (**Table 1**). Once again, the composition survey

conducted in October 2023 resulted in the lowest observed calf:100 cow ratio of 3 calves:100 cow, indicating an anticipated low recruitment for 2024.

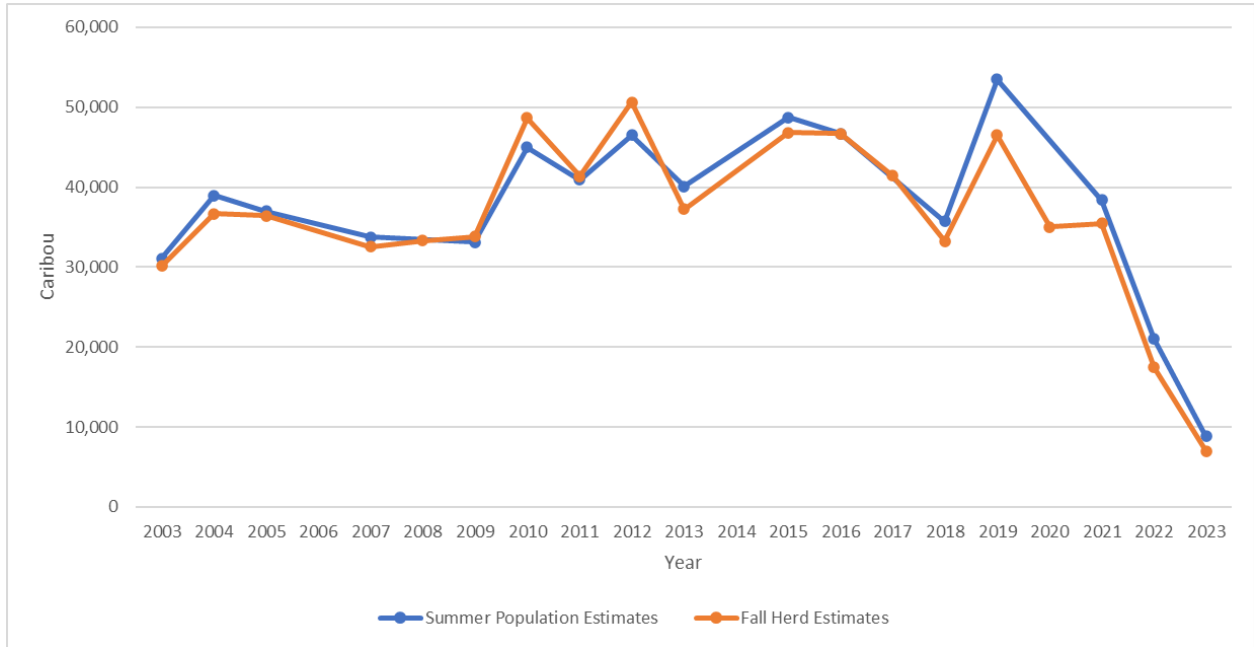


Figure 2. Summer and fall population estimates for the NCH (ADF&G 2024). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

Table 1. Population estimates and fall composition metrics of the NCH (Tobey and Kelleyhouse 2007; ADF&G 2008, 2010b, 2019a, 2023a, 2023b, 2024; Schwanke 2011; Schwanke and Robbins 2013; Robbins 2015, pers. comm.; Rinaldi 2019, pers. comm; Hatcher 2021, pers. comm;).

Year	Bulls:100 cows ^a	Calves:100 cows ^a	Summer Estimates ^b	Fall Estimates
2003	31	35	31,114	30,141
2004	31	45	38,961	36,677
2005	36	41	36,993	36,428
2006	23 ^c	40 ^c		
2007	34	35	33,744	32,569
2008	39 ^c	40 ^c		33,288
2009	42	29	33,146	33,837
2010	64	55	44,954	48,653
2011	58	45	40,915	41,394
2012	57	31	46,496	50,646
2013	30	19	40,121	37,257
2014	42	45		
2015	36	45	48,700	46,816
2016	57	48	46,673	46,673
2017	35 ^c	35 ^c		41,411
2018	40	20	35,703	33,229
2019	32	41	53,500	46,528
2020	28 ^c	17 ^c		35,000
2021	38	45	38,400	35,500
2022	26	16	21,000	17,433
2023	25 ^d	3	8,823	6,983
Average	38	35	37,453	36,340

^a Fall composition counts

^b Summer photocensus

^c Modeled estimate

^d Summer ratio

Cultural Knowledge and Traditional Practices

The range of the Nelchina herd falls largely within the traditional territory of the Ahtna Athabascans (de Laguna and McClellan 1981). The winter range of the herd, though variable, also extends east and north into the upper Tanana region, populated historically by speakers of Tanacross and Upper Tanana Athabascan languages, with whom the Ahtna have historically maintained ties based on reciprocity and kinship (McKenna 1981, Reckord 1983, Haynes and Simeone 2007). Archaeological evidence and historical accounts indicate that caribou have been a primary subsistence resource for both groups for

generations (de Laguna and McClellan 1981, McKennan 1981, Simeone 2006, Haynes and Simeone 2007).

Caribou continue to be a vital resource for communities within the range of the Nelchina herd (Haynes and Simeone 2007, Holen et al. 2012, Kukkonen and Zimpelman 2012, La Vine et al. 2013, La Vine and Zimpelman 2014, Holen et al. 2014, Holen et al. 2015, Godduhn and Kostick 2016, Brown et al. 2017). **Table 2** lists communities with a customary and traditional use determination for caribou in hunt areas within the closure request area.

ADF&G's Division of Subsistence conducts household subsistence harvest surveys every 10 to 15 years, which document communities' patterns of resource use. In the most recent comprehensive subsistence surveys of communities in **Table 2**, the percentage of the total wild food harvest composed of large land mammals ranged from 12% to 72%, depending on the community (Holen et al. 2012, CSIS 2024).¹ Caribou made up 0% to 23% of communities' total wild food harvest by edible weight (Holen et al. 2012, CSIS 2024). Even in communities that reported no harvest during the study year, caribou were still widely received and used. For example, while Tolsona reported no caribou harvest during the 2013 study year (the most recent survey year for the community), 25% of Tolsona households reported using caribou in 2013 (Holen et al. 2015, CSIS 2024).

Harvest and search areas illustrate a pattern of hunting primarily along nearby road corridors, valley floors, and hills close to home (Haynes and Simeone 2007, Holen et al. 2012, Kukkonen and Zimpelman 2012, La Vine et al. 2013, La Vine and Zimpelman 2014, Holen et al. 2014, Holen et al. 2015, Godduhn and Kostick 2016, Brown et al. 2017). In the most recent surveys for Copper River Basin communities (2009 to 2015), residents harvested caribou every month except April through July. The greatest percentage of the estimated harvest took place in September (41%), October (26%), and November (12%) (La Vine et al. 2013, La Vine and Zimpelman 2014, Holen et al. 2014, Holen et al. 2015, Brown et al. 2017).

During the most recent survey years for upper Tanana region communities (2010 to 2014), residents harvested caribou every month except May and June. The greatest percentage of the estimated harvest occurred in November (23%), followed by August (22%), and March (15%) (La Vine et al. 2013, Holen et al. 2012, Godduhn and Kostick 2016). Timing of harvest was constrained by regulatory seasons and when migration occurred during each survey year.

In subsistence surveys, many respondents in Copper and upper Tanana river region communities had concerns about the number of caribou and other large land mammals taken by non-local hunters (e.g. Holen et al. 2015). Respondents noted that an influx of urban hunters, which causes traffic pressure on the roads and increases in the use of off-road vehicles, has decreased federally qualified subsistence users' access, efficiency, and caribou hunting success rates; these processes are also driving caribou further from road corridors (Holen et al. 2012, Kukkonen and Zimpelman 2012, La Vine et al. 2013, La Vine and Zimpelman 2014, Holen et al. 2015, Godduhn and Kostick 2016). Some community members have also

¹ A handful of communities were last surveyed in the 1980s. These are excluded from the summary due to the age of the results. Delta Junction has not been surveyed by ADF&G, Division of Subsistence (CSIS 2024).

noted that warmer weather is extending longer into the hunting season and altering the timing of yearly biological cycles and herd migrations (Kukkonen and Zimpelman 2012; La Vine et al. 2013; La Vine and Zimpelman 2014, Holen et al. 2015).

Table 2. Communities with a customary and traditional use determination for caribou in hunt areas within the closure request area. Note that additional, dispersed residents also have C&T within portions of the closure request area.

Community	Unit in Which Community is Located	Estimated Population in 2022 (ADLWD 2022)
McCarthy	11	114
McCarthy Road	11	No data
Northway	12	223
Tanacross	12	141
Tetlin	12	140
Tok	12	1,324
Mentasta Pass	12	No data
Lake Louise	13A	40
Mendeltna	13A/D	46
Nelchina	13A/D	46
Glacier View/Sheep Mountain	13A/D	251
Glennallen	13A/D	427
Tolsona	13A/D	12
Gulkana	13B	89
Paxson	13B	26
Chistochina	13C	56
Gakona	13C	181
Mentasta Lake	13C	118
Slana/Nabesna Rd	13C/11/12	93
Chitina	13D	97
Copper Center/Silver Springs	13D	421
Kenny Lake/Willow Creek	13D	294
Tazlina	13D	257
Tonsina	13D	51
Cantwell	13E	196
Chickaloon	14B	246
Denali Park	20C	149
Delta Junction	20D	983
Dot Lake	20D	48
Healy Lake	20D	22

Harvest History

The NCH is a popular herd to hunt and experiences heavy harvest pressure due to its road accessibility and proximity to Fairbanks and Anchorage. Harvest quotas are adjusted annually in response to population estimates to achieve State management objectives and keep the herd within sustainable levels (Schwanke and Robbins 2013). In recent years, caribou migration patterns have made caribou largely unavailable on Federal public lands during the fall Federal season (Aug. 1– Sep. 30) with their presence peaking during October when the season is closed for the rut (BLM 2020, OSM 2023b).

Over 95% of total NCH harvest occurs in Unit 13. Between 2001 and 2022, harvest from the NCH under State regulations ranged from 519–5,785 caribou/year (**Table 3**). Over the same period, caribou harvest under Federal regulations in Unit 13 ranged from 102–610 caribou/year (**Table 3**). Federal harvest (FC1302) accounts for 14% of the total Unit 13 caribou harvest on average. Fluctuations in Unit 13 caribou harvest parallels changes in abundance and population estimations. No Federal or State harvest of Nelchina caribou has occurred since 2022/23 as all hunts were closed due to conservation concerns in 2023.

Federal FC1302 permits issued from 2019–2022 averaged 2,746, which is comparable to the long-term average (2001-2022) of 2,762 permits (**Table 4**). The 2022/23 reported Federal harvest of 166 caribou was much lower than the long-term average (2001–2022) of 371 (OSM 2023b). The lower 2022/23 Federal subsistence harvest may be because of lower abundance of caribou or because they migrated through Federal public lands during October when the season was closed.

Between 2001 and 2022, the number of Federal subsistence hunters and harvest success rates for the FC1302 hunt have shown substantial annual variation (**Table 4**). Between 2001 and 2022, Federal subsistence hunter numbers ranged from 898 to 1,560 with an average 1,326 per year. Harvest for the same time frame ranged from 102 to 610 caribou with an average success rate of 28%. (OSM 2023b). Success rates for caribou harvest depend largely on caribou availability (a function of migration timing) rather than abundance, and availability likely explains some of the substantial annual variation. Of note, federally qualified subsistence users may also harvest under State regulations, and those harvests are not reflected in the data above or in **Table 4**. The data described above and in **Table 4** only considers harvests under Federal regulations (FC1302).

In Unit 12, no Nelchina caribou harvest has occurred under State regulations since 2001 as the State season has been closed. State harvest of NCH caribou in Unit 12 does not occur. Opportunities for caribou harvest of the Macomb herd do exist in a small portion of Unit 12 by registration permit (RC835). Other opportunities for caribou exist in small portion west of the Glenn and south of the Alaska Highway by harvest ticket. These caribou are believed to be small satellite herds associated with the Macomb herd. No harvest of caribou had occurred in Unit 12 remainder under state regulations since 2001, when the may be announced winter season was removed from regulation. In Unit 12 remainder, Federal permit FC1202 allows for harvest of caribou on Federal public lands during a may be announced winter season. This hunt has been announced annually since 1998, while not being offered only three years since inception (OSM 2023b). In-season management for this hunt has been delegated to the Tetlin National Wildlife Refuge Manager and includes announcing the sex of the caribou that may be taken as well as the

season dates. While this hunt sees less participation than the Unit 13 hunt, with a smaller pool of federally qualified subsistence users and no corresponding State hunt, annual harvest averages 28 caribou (**Table 5**). FC1202 also allows for the harvest of cows during the winter when they may be pregnant. Cow harvest has comprised between 0–100% of FC1202 harvest from 2001–2022, averaging 40% (OSM 2023b). Harvest of a pregnant cows would negatively affect the productivity of the herd and hamper recovery, although the in-season manager has the authority to limit harvest to bulls-only.

In Unit 11 no Federal caribou harvest has occurred due to conservation concerns over the Mentasta caribou herd. No caribou hunt exists in State regulations. While a may be announced season and Federal permit (FC1108) were established under Federal regulations in 2022 to provide opportunity if Nelchina caribou were available, the season has never been announced.

Table 3. Total harvest of Nelchina caribou in Unit 13. Showing State harvest quota, State harvest, and Federal harvest (Tobey and Kelleyhouse 2007; Schwanke and Robbins 2013; Robbins 2015, pers. comm.; BLM 2020; OSM 2023b).

Regulatory Year	Harvest Quota	State Harvest	Federal Harvest (FC1302)	Total Unit 13 Harvest
2001		1,479	498	1,977
2002		1,315	337	1,652
2003		995	322	1,317
2004		1,226	335	1,561
2005		2,772	610	3,382
2006		3,043	570	3,613
2007		1,314	385	1,699
2008		1,315	273	1,588
2009		753	349	1,102
2010	2,300	1,899	451	2,350
2011	2,400	2,032	395	2,427
2012	5,500	3,718	537	4,255
2013	2,500	2,303	279	2,582
2014	3,000	2,712	237	2,949
2015	5,000	3,402	595	3,997
2016	N/A ^a	5,785	491	6,276
2017	6,000	4,529	358	4,887
2018	1,400	1,411	370	1,781
2019	3,450	2,735	102	2,837
2020	5,090	3,770	306	4,076
2021	1,250	1,505	220	1,725
2022	615	519	166	685
2023	0	0	0	0

^a Original quota of 4,000 caribou was lifted and no adjusted quota was announced.

Table 4. The number of permits issued, permits used, and caribou harvested under permit FC1302 Federal caribou hunt in Unit 13 (OSM 2023b).

Regulatory Year	Permits Issued	Hunted	Harvested Male	Harvested Female	Harvested Unknown Sex	Total Harvested
2001	2,565	1,469	489	3	6	498
2002	2,507	1,379	323	2	12	337
2003	2,574	1,240	317	2	3	322
2004	2,555	1,337	248	85	2	335
2005	2,557	1,499	365	238	7	610
2006	2,631	1,317	318	238	14	570
2007	2,399	1,092	259	120	6	385
2008	2,532	1,229	180	89	4	273
2009	2,576	1,339	342	7	0	349
2010	2,852	1,535	316	129	6	451
2011	2,980	1,425	281	113	1	395
2012	2,953	1,518	326	203	8	537
2013	2,781	1,303	210	68	1	279
2014	2,943	1,395	177	59	1	237
2015	3,061	1,560	444	147	4	595
2016	3,151	1,530	299	192	0	491
2017	3,071	1,526	208	148	2	358
2018	3,082	1,433	232	135	3	370
2019	2,785	898	80	21	1	102
2020	2,915	1,194	193	112	1	306
2021	2,606	945	149	71	0	220
2022	2,676	1,015	115	51	0	166
2023	0	0	0	0	0	0
AVERAGE (2001-2022)	2,761	1,326	267	102	4	372

Table 5. The number of permits issued, permits used, sex and total caribou harvested under permit FC1202 Federal caribou hunt in Unit 12 (OSM 2023b).

Regulatory Year	Permits Issued	Hunted	Male	Female	Unknown Sex	Total Harvest
2001	41	18	1	0	0	1
2002	2	2	0	0	0	0
2003	102	44	13	0	0	13
2004	114	49	18	1	0	19
2005	78	39	6	10	0	16
2006	53	30	0	3	0	3
2007	88	34	11	5	2	18
2008	147	66	15	13	0	28
2009	111	49	18	0	2	20
2010	120	75	31	23	0	54
2011	103	61	37	9	3	49
2012	152	100	35	35	1	71
2013	113	68	15	21	4	40
2014	116	59	15	22	0	37
2015	126	75	14	35	0	49
2016	114	47	3	3	0	6
2017	128	36	6	4	0	10
2018	88	43	10	1	0	11
2019	158	96	20	33	1	54
2020	149	79	23	33	0	56
2021	130	61	16	11	1	28
2022	108	62	3	19	0	22
2023	0	0	0	0	0	0
AVERAGE (2001-2022)	106	54	14	13	1	28

Other Alternatives Considered

One alternative considered was to delegate authority to manage the NCH hunts in Units 11, 12, and 13 to Federal in-season managers through delegation of authority letters (DALs). Specifically, the authority delegated to the BLM Glennallen FO manager through WP24-09 could be expanded to all of Unit 13. (Note: this could also be done administratively). Authority to fully manage the Unit 12 remainder caribou hunt could be delegated to the Tetlin National Wildlife Refuge manager, while the WRST superintendent already has delegated authority to manage the Unit 11 caribou hunt. Issuing these comprehensive DALs would provide management flexibility and the ability to respond in a timely manner to changing hunt and herd conditions. OSM considers this a viable, long-term solution for managing the Nelchina caribou hunts on Federal public lands when the herd population increases. However, OSM did not further consider this alternative because there is currently not any harvestable surplus to suggest that in-season management would be needed this year for any of the Nelchina caribou hunts. If a proposal were submitted to effect

this alternative, the full regulatory process would also allow adequate public notice and input from the affected Regional Advisory Councils and other entities.

Another alternative considered was to extend the closure through the 2025/26 regulatory year. This extension would allow more time for the NCH to recover and would reduce the administrative burden on subsistence users of submitting special action requests and awaiting the process. However, it could curtail subsistence harvest opportunity if the NCH recovers sufficiently to allow for any harvest next year.

Effects

If this special action request is approved by the Board, there will be no harvest of caribou from the NCH on Federal public lands in Units 11, 12 remainder, or 13 by any users for the 2024/25 season, including harvest under Federal registration permits FC1108, FC1202, FC1302 or the AITRC administered community harvest system. This would be a major reduction in an important subsistence resource available to federally qualified subsistence users.

The Glennallen FO typically starts issuing permits for the FC1302 caribou hunt in Unit 13 on July 1st of each year. Closing the hunt in June before any permits are issued would reduce confusion and reduce the administrative burden on Federal agency staff. Last year, the Federal fall hunts were not closed until late July, after permits had already been issued, leading to some confusion over the permits' validity.

A closure in Units 11, 12 remainder, and 13 to caribou hunting may lead to an increase of hunters, both federally qualified subsistence users and non-federally qualified users, traveling to other regions to harvest caribou. This may result in more users traveling to the Upper Tanana area to hunt the FCH in Units 20 and 25, or for those with C&T to hunt the Chisana caribou herd in the southeast portion of Unit 12.

While this closure will substantially reduce subsistence harvest opportunity and create hardships for many federally qualified subsistence users, eliminating harvest will help conserve the NCH and could aid in its recovery. Any population increase may provide for more subsistence opportunity in the future.

Approval of a §804 user prioritization would not have any functional effect on the NCH or federally qualified subsistence users for the 2024/25 regulatory year as the hunt would be closed to all users.

OSM CONCLUSION

Support Wildlife Special Action WSA24-02 **with modification** to provide an exception for traditional religious ceremonies and cultural/educational program permit harvest and to postpone a decision on the ANILCA §804 user prioritization analysis to the February 2025 Board Fisheries Regulatory meeting through Wildlife Proposal WP25-01.

Take No Action on WSA24-03.

Justification

Severe conservation concerns warrant a closure to caribou hunting on Federal public lands in Units 11, 12 remainder, and 13 by all users. The NCH population has drastically declined and is well below population objectives. No harvestable surplus is available. Supporting WSA24-02 will promote the recovery of the NCH by eliminating additive mortality, which will help maintain the current population, and bolster productivity and recruitment of the herd. While this closure negatively impacts federally qualified subsistence users in the short-term, it will help ensure the continued viability of the NCH and subsistence opportunity in the future.

Allowing caribou harvests for memorial potlatches and cultural programs supports cultural continuation and handing down of knowledge through generations. The potential harvest of a few caribou for funerary or educational purposes would not pose any conservation concerns but could greatly benefit federally qualified subsistence users. (Note: Traditional religious ceremony harvests are exempted from Federal lands closures per Federal regulation §100.26(m), although explicitly including the exception here removes any ambiguity and reduces confusion).

Urgent action is needed to close Federal public lands to the harvest of the NCH and is necessary for conservation purposes. The process for the ANILCA §804 user prioritization of the NCH is a very involved process that requires more time. A full, comprehensive analysis for the §804 user prioritization will be conducted through the regulatory process that will allow for Council recommendations as required by Federal regulation and will provide additional opportunity for input by the public, the 30 affected communities, and Tribes. As Federal hunts on the NCH would be completely closed for the 2024/25 regulatory year, postponing a decision on the §804 analysis until February 2025 has no functional effect on subsistence users or the NCH.

Literature Cited

ADF&G. 2001. Caribou management report of survey-inventory activities 1 July 1998–30 June 2000. C. Healy, editor. Project 3.0. Juneau, Alaska.

ADF&G. 2008. Caribou Annual Survey and Inventory. Federal Aid Annual Performance Report Grant W-33-6, Anchorage, AK.

ADF&G. 2010a. Overview of Nelchina Caribou Herd Regulation and Harvest History. Special Publication No. BOG 2010-05.

ADF&G. 2010b. Hunting and Trapping Emergency Order No. 04-1-10. ADF&G. Glennallen, AK.

ADF&G. 2017. Harvest General Reports database.

https://secure.wildlife.alaska.gov/index.cfm?adfg=harvest.main&_ga=1.109733509.1089519111.1465854136, accessed March 6, 2017. Anchorage, AK.

ADF&G. 2019a. 2019-2020 Alaska Subsistence Permit Hunt Supplement. <http://hunt.alaska.gov>.

ADF&G. 2019b. Hunting and Trapping Emergency Order No. 04-09-19. ADF&G. Glennallen, AK.

ADF&G. 2022. 2023-2024 Alaska Drawing Permit Hunt Supplement. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.adfg.alaska.gov/static/applications/web/nocache/license/huntlicense/pdfs/2023-2024_draw_supplement.pdf76BD9B2BDE28FD6331C233465A4691EA/2023-2024_draw_supplement.pdf. Accessed July 8, 2023.

ADF&G. 2023a. Tab 7.1 Proposals for Other Regions Excluding Reauthorizations. ADF&G Southcentral Region Board of Game Meeting. March 17–22, 2023 Soldotna, AK.
<http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-17-2023&meeting=kenai> Accessed March 30, 2023.

ADF&G. 2023b. Feasibility Assessment for Maintaining or Increasing Sustainable Harvest of Nelchina Caribou in Game Management Unit 13. ADF&G Southcentral Region Board of Game Meeting. March 17–22, 2023 Soldotna, AK.

ADF&G. 2023c. Annual Report on Intensive Management for Moose with Predation Control in Unit 13. ADF&G, Division of Wildlife Conservation.

ADF&G. 2024. 2023 Nelchina Caribou Herd Fall Composition Survey and Fall Population Estimate Memorandum. ADF&G, Division of Wildlife Conservation. Glennallen, AK. Apr. 7, 2024.

BLM. 2020. Bureau of Land Management, Glennallen Field Office Agency Report. Southcentral Subsistence Regional Advisory Council meeting. March 4-5, 2020. Anchorage, AK.

Brown, C. L., M.L. Kostick, C.B.M. McDavid, C.R. McDevitt, A. Trainor, and J. Park. 2017. Harvest and Use of Subsistence Resources in 4 Communities in the Nenana Basin, 2015. Technical Paper No. 429. Fairbanks, AK.

CSIS (Community Subsistence Information System). 2023. Alaska Department of Fish and Game, Division of Subsistence. <http://www.adfg.alaska.gov/sb/CSIS/>. Accessed September 11, 2023.

de Laguna, F. and C. McClellan. 1981. Ahtna. Pages 641-663 in J. Helm, ed. Handbook of North American Indians. Vol. 6, Subarctic. Smithsonian Institution, Washington DC.

Godduhn, A. R. and M.L. Kostick. 2016. Harvest and use of wild resources in Northway, Alaska, 2014, with special attention to nonsalmon fish. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 421. Fairbanks, AK.

Hatcher, H. 2021. Wildlife biologist. Personal communication: email. ADF&G. Glennallen, AK.

Hatcher, H. L., and W. F. Robbins. 2021. Nelchina caribou herd management report and plan, Game Management Unit 13: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-16, Juneau.

Haynes, T.L. and W.E. Simeone. 2007. Upper Tanana Ethnographic Overview and Assessment, Wrangell St. Elias National Park and Preserve. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 325. Anchorage, AK.

Holen, D., S. M. Hazell, and D.S. Koster. 2012. Subsistence harvests and uses of wild resources by communities in the Eastern Interior of Alaska , 2011. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 372. Anchorage, AK.

Holen, D., S.M. Hazell, J.M. Van Lanen, J.T. Ream, S.P.A. Desjardins, B. Jones, and G. Zimpelman. 2014. The harvest and use of wild resources in Cantwell, Chase, Talkeetna, Trapper Creek, Alexander/Susitna, and Skwentna, Alaska, 2012. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 385. Anchorage, AK.

Holen, D., S. M. Hazell, and G. Zimpelman, editors. 2015. The Harvest and Use of Wild Resources in Selected Communities of the Copper River Basin and East Glenn Highway, Alaska, 2013. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 405. Anchorage, AK.

Kukkonen, M. and G. Zimpelman. 2012. Subsistence Harvests and Uses of Wild Resources in Chistochina, Alaska, 2009. Anchorage: Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 370. Anchorage, AK.

La Vine, R., M. Kukkonen, B. Jones, and G. Zimpelman. 2013. Subsistence Harvests and Uses of Wild Resources in Copper Center, Slana/Nabesna Road, Mentasta Lake, and Mentasta Pass, Alaska, 2010. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 380. Anchorage, AK.

La Vine, R. and G. Zimpelman. 2014. Subsistence Harvests and Uses of Wild Resources in Kenny Lake/Willow Creek, Gakona, McCarthy, and Chitina, Alaska, 2012. Alaska Department of Fish and Game Division of Subsistence. Technical Paper No. 394. Anchorage, AK.

McKennan, R. A. 1981. Tanana. Pages 562 to 576 in J. Helm, ed. Handbook of North American Indians. Vol. 6, Subarctic. Smithsonian Institution, Washington DC.

OSM. 2012. Staff analysis WP12-25. Pages 589–603 in Federal Subsistence Board Meeting Materials April 6–April 10, 2012. Office of Subsistence Management, FWS. Anchorage, AK. 1020 pp.

OSM. 2018. Staff analysis WP18-19. Pages 736-802 in Federal Subsistence Board Meeting Materials April 10-13, 2018. Office of Subsistence Management, FWS. Anchorage, AK. 1488pp.

OSM. 2023a. Staff Analysis WP24-09. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM. 2023b. Federal permits database. Office of Subsistence Management, USFWS. Anchorage, AK. Accessed April 17, 2023.

Reckord, H. 1983. That's the way we live: Subsistence in the Wrangell-St. Elias National Park and Preserve. University of Alaska Fairbanks, Occasional Paper Number 34. Anthropology and Historic Preservation Cooperative Park Studies Unit. Fairbanks, AK.

Rinaldi, T.A. 2019. Wildlife biologist. Personal communication: email. ADF&G. Palmer, AK.

Robbins, W.F. 2014. Unit 13 moose. Chapter 12, Pages 12-1 through 12-14 in P. Harper and L.A. McCarthy, editors. Moose management report of survey and inventory activities. 1 July 2011-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2014-6, Juneau, AK.

Robbins, W.F. 2015. Wildlife biologist. Personal communication. Phone, email. ADF&G. Glennallen, AK.

Schwanke, R.A. 2011. Unit 13 and 14B caribou management report. Pages 90-108 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2008 –30 June 2010. ADF&G. Juneau, AK.

Schwanke, R.A. and W.F. Robbins. 2013. Unit 13 and 14B caribou management report. Pages 104-124 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2010 –30 June 2012. ADF&G. ADF&G/DWC/SMR-2013-3, Juneau, AK.

Simeone, W.E. 2006. Some Ethnographic and Historical Information on the Use of Large Land Mammals in the Copper River Basin. National Park Service Resource Report, NPS/AR/CRR-2006-56. Copper Center, AK. 56 pages.

Tobey, R. W. 2003. Units 13 and 14B caribou management report. Pages 108-124 in C. Healy, editor. Caribou management report of survey and inventory activities 1 July 2000 – 30 June 2002. ADF&G. Juneau, Alaska.

Tobey R. W. and R. Kelleyhouse. 2007. Units 13 and 14B caribou management report. Pages 83-99 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2004-30 June 2006. ADF&G. Juneau, AK.

Appendix 1

Wildlife Proposal WP25-01

Submitter

Office of Subsistence Management
1011 E. Tudor Rd. M/S 121; Anchorage, AK 99503
Subsistence@fws.gov

Issue

This proposal requests changing all Nelchina caribou herd (NCH) hunts to may be announced seasons, delegating authority to Federal in-season managers to manage the NCH hunts, and conducting a §804 user prioritization analysis for the NCH.

Proposed Federal Regulations

Unit 11–Caribou

1 bull by Federal registration permit

May be announced.

Federal public lands are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis).

Unit 12–Caribou

Unit 12, remainder—1 bull

*May be announced
between Sep. 1–20.*

Unit 12, remainder—1 caribou ~~may be taken by a~~ Federal registration permit ~~during a winter season to be announced.~~

*Winter season ~~to~~
may be announced
between Oct. 1–Apr.
30.*

*Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by The Tetlin National Wildlife Refuge Manager, in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, **Office of Subsistence Management**, and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee **may announce season dates, harvest quotas, open/close seasons, and for the winter season, set sex restrictions.***

Federal public lands are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis).

Unit 13–Caribou

Units 13A and 13B— up to 2 caribou by Federal registration permit only (FC1302)

May be announced between Aug. 1– Sep. 30

The Glennallen Field Office Manager, in consultation with the Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons, and set sex restrictions and harvest limits.

May be announced between Oct. 21– Mar. 31

Federal public lands are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis).

Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)

May be announced between Aug. 1– Sep. 30

The Glennallen Field Office Manager, in consultation with the Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource Commission, and Chair of the affected Councils, may announce season dates, harvest quotas, open/close seasons.

May be announced between Oct. 21– Mar. 31

Federal public lands are closed are closed to caribou hunting except by residents of (communities to be determined via a §804 analysis).

Justification

Regulatory action outside of the normal wildlife regulatory cycle is warranted due to severe conservation concerns for the Nelchina caribou herd coupled with the importance of caribou to local subsistence users. The NCH population has drastically declined and is well below population objectives. No harvestable surplus is currently available, although allowing limited harvest for communities most dependent on the herd as soon as biologically sustainable is important for the continuation of subsistence uses.

Several special action requests (WSA24-02 and WSA24-03) were submitted for the 2024/25 regulatory year requesting a §804 user prioritization analysis for the Nelchina herd. Conducting §804 analyses as part of a special action request is difficult due to the limited timeline and opportunities for input. It is imperative that affected Councils be given the opportunity to provide their recommendations on the §804

analysis and that the public be given the opportunity to provide testimony at the Council meetings. It is also critical that affected Tribes and ANCSA Corporations be given additional opportunity for consultation on the §804 analysis.

Submitting this proposal as part of the fisheries regulatory cycle allows adequate opportunity for comment, provides more regulatory options and flexibility, and enables more timely regulatory action rather than waiting an additional year for the wildlife regulatory cycle and processing additional special action requests.