



# Ahtna Intertribal Resource Commission

PO Box 613 – Glennallen, Alaska 99588  
Phone: (907) 822-4466 Fax: (907) 822-4406

[www.ahtnatribal.org](http://www.ahtnatribal.org)  
[connect@ahtnatribal.org](mailto:connect@ahtnatribal.org)

**June 30, 2025**

Federal Subsistence Board  
c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503

**Dear Federal Subsistence Board Members,**

On behalf of the Ahtna Intertribal Resource Commission (AITRC), thank you for the opportunity to submit comments on the proposed regulatory changes for the 2026–2028 Federal Subsistence Wildlife cycle WP26. AITRC represents the eight federally recognized Tribes of the Ahtna Region, working in partnership to protect and strengthen the Ahtna people's continued customary and traditional use of wildlife and natural resources across our territory.

The enclosed comments reflect the unified input of AITRC's member Tribes, professional staff, and our Fish and Wildlife Committee. These positions are grounded in generations of ecological knowledge and lived experience managing and relying upon species such as moose, caribou, bear, and Dall sheep. The proposals we support — and the conditions we recommend — aim to ensure subsistence resources remain accessible, sustainable, and managed in a way that reflects the priorities of the Indigenous communities who depend on them.

We appreciate the Board's continued engagement with Tribal voices and hope these comments assist in your deliberations. Thank you for your service and for considering the perspectives of AITRC and the Ahtna people.

Tsin'aen,

**Karen Linnell**

Executive Director

Ahtna Intertribal Resource Commission (AITRC)

## **WP26-01: Move delegated authority to letters in unit specific regulations**

### **Position: Support with Conditions**

#### **Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports the overarching goal of expanding delegated authority to local Federal land managers for timely decision-making on wildlife Special Action Requests. Delegating authority to in-region managers can help ensure more responsive management and quicker resolution of emergency or conservation-related issues, especially when resource conditions change rapidly.

However, AITRC recommends that any delegation of authority must be paired with meaningful consultation protocols. Specifically:

- **Tribal Consultation:** Local land managers must be required to consult with affected Tribes and Tribal consortia (such as AITRC) prior to acting on wildlife special action requests that impact subsistence species, timing, or access. This ensures local knowledge and cultural priorities are considered in decisions that affect Tribal citizens.
- **Transparency and Accountability:** All delegated actions taken by field staff should be clearly documented and made publicly available in a timely manner, with specific justifications. This transparency supports public trust and ensures that decisions align with ANILCA's intent to prioritize subsistence uses.
- **Consistency Across Units:** Delegated authority should be applied consistently across all relevant Federal units. Disparities in how or where authority is delegated can lead to uneven outcomes and confusion among users.
- **Scope Limitations:** We support the idea that delegated authority remains limited to certain actions (e.g., adjusting seasons, closing areas, or modifying harvest limits) and does not extend to more controversial regulatory changes that require full Board review.

**AITRC strongly recommends the inclusion of language requiring consultation with the Ahtna Intertribal Resource Commission (AITRC) whenever delegated in-season decisions are made for wildlife populations that affect or occur within the Ahtna Traditional Use Territory.**

This amendment would align WP26-01 with the precedent set by WP25-01, which AITRC supported, and which acknowledged the importance of consultation during Nelchina Caribou Herd management actions. Specifically, WP25-01 underscored:

- The necessity of responsive and adaptive in-season decision-making (e.g., harvest limits, season adjustments, sex restrictions);
- The critical role that AITRC plays as a regional subsistence management partner under the cooperative agreement established with the U.S. Department of the Interior;
- The inadequacy of static harvest regulations in the face of shifting wildlife population dynamics.

**AITRC requests that the final language for WP26-01 include the following provision in the Unit-Specific Regulations:**

#### **“Unit 11—Moose**

Unit 11, that portion south and east of a line running along the north bank of the Chitina River, the north and west banks of the Nizina River, and the west bank of West Fork of the Nizina River, continuing along the western edge of the West Fork Glacier to the summit of Regal Mountain—1 bull by Federal registration permit. However, during the period Aug. 20 - Sep. 20, only an antlered bull may be taken.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Chugach National Forest, **Ahtna Intertribal Resource Commission**, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set harvest quotas and season dates for the winter season.”

#### **“Unit 12**

Caribou 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.

The Wrangell-St. Elias National Park and Preserve superintendent after coordination with ADF&G, OSM, Tetlin NWR, **Ahtna Intertribal Resource Commission**, and the Chair of the affected Council(s) is authorized within the regulatory parameters set by the Board, to set or open/close the season, announce the harvest quota, the number of permits, and the reporting period.”

This consultation requirement reflects the importance of Indigenous knowledge systems, ensures transparent and inclusive decision-making, and advances the legal intent of ANILCA to prioritize rural and federally qualified users.

By formally embedding AITRC consultation into the in-season decision-making framework, WP26-01 will better support responsive conservation management while maintaining community trust and local relevance. We urge the Federal Subsistence Board to adopt this language as a condition of approving WP26-01.

In conclusion, AITRC supports this proposal, provided that Tribal consultation is mandatory and not discretionary. This change, if implemented with Indigenous participation, has the potential to improve both the responsiveness and cultural appropriateness of wildlife management decisions on Federal lands.

#### **WP26-24: Unit 11 Brown Bear – Increase Harvest Limit from 1 to 2**

##### **Position: Support with Monitoring Conditions**

##### **Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports the proposal submitted by the Eastern Interior Alaska Regional Advisory Council to increase the brown bear harvest limit in Unit 11 from one to two bears per regulatory year. This proposed change would provide greater flexibility and opportunity for federally qualified subsistence users.

Brown bears are an important part of Ahtna cultural traditions. However, AITRC recommends that any regulatory change to increase harvest opportunity be accompanied by the following conditions:

- **Regular Population Monitoring:** While no conservation concerns are currently identified, AITRC recommends that bear population data be reviewed at least every 3–5 years to assess harvest impacts and maintain long-term sustainability.
- **Spatial Tracking of Harvest Pressure:** Areas near the Nabesna Road and McCarthy Road are more accessible and subject to higher hunting effort. Targeted monitoring in these zones is advised to avoid local depletion or overharvest.
- **Tribal Consultation:** Future management actions related to brown bear harvest in Unit 11 should involve consultation with Ahtna Tribes and organizations. Local input is critical for adaptive management and maintaining cultural and ecological integrity.

Increasing the harvest limit aligns with the need for flexible and responsive subsistence regulations, especially as rural communities face rising costs of living, limited store-bought food access, and variable wildlife availability. With appropriate safeguards, AITRC views this proposal as a beneficial and balanced step forward.

#### **WP26-25: Unit 13 Remainder – Increase Brown Bear Harvest Limit from 1 to 2 Bears**

##### **Position: Support with Continued Monitoring**

##### **Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports the proposal to increase the brown bear harvest limit from one to two bears per year for federally qualified subsistence users in Unit 13. Allowing an increased harvest aligns Federal regulations with the State's updated limit and provides consistent opportunity.

Unit 13 encompasses a wide geography including critical subsistence areas around Gulkana, Tazlina, Copper Center, Chistochina, and Cantwell. Many of these areas see limited brown bear harvest pressure due to low accessibility, but in road-accessible zones, higher take may occur. Therefore, AITRC recommends the following:

- **Monitoring by Subunit or Access Zone:** While overall conservation concerns are minimal, harvest data should be reviewed with attention to areas where effort may be concentrated.
- **Tribal Engagement in Data Collection:** AITRC encourages greater inclusion of local Tribal observers and hunters in monitoring brown bear harvest data to better understand local population trends and ensure sustainable use.
- **Cultural Protocols and Education:** As harvest opportunity increases, AITRC supports outreach efforts to ensure respectful and complete use of harvested bears, in line with Ahtna values of gratitude and conservation.

Given the size of Unit 13 and the low percentage of Federal lands, we view this proposal as a reasonable adjustment that enhances food security while respecting the balance of human and ecological needs. We request continued coordination between Federal managers, AITRC, and Ahtna communities to ensure long-term success.

## **WP26-26: Unit 13A – Increase Brown Bear Harvest Limit from 1 to 2 Bears**

### **Position: Support with Localized Oversight**

#### **Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports the Southcentral Regional Advisory Council's proposal to increase the brown bear harvest limit in Unit 13 from one to two bears annually for federally qualified subsistence users. This change aligns Federal regulations with the State of Alaska's recent regulatory update (Board of Game Proposal 57) and removes an unnecessary discrepancy that could create confusion or limit access for federal subsistence users.

Unit 13A contains lands used by residents of Cantwell and surrounding Ahtna communities who have deep-rooted subsistence ties to the region. Increasing the harvest limit supports:

- **Food Security and Cultural Continuity:** Bears are used for both nutritional and cultural purposes, and an expanded harvest limit offers flexibility for families to meet annual needs or respond to traditional harvest opportunities.
- **Regulatory Alignment:** Matching Federal and State rules simplifies compliance and enforcement, particularly in mixed-jurisdiction areas such as Denali National Park and Preserve, where a sealing requirement and harvest cap remain in place.
- **Low Conservation Risk:** No biological concern has been identified for brown bear populations in this unit. Harvest remains relatively low, especially on federal lands, due to limited access.

AITRC recommends continued population monitoring, with attention to harvest activity near transportation corridors. We also encourage outreach to educate hunters on respectful and complete bear utilization. With these considerations in place, we view the proposal as a sensible adjustment that upholds the intent of ANILCA to prioritize rural and Indigenous subsistence users.

## **WP26-27: Unit 13 Caribou – Change Harvest Limit**

### **Position: Support with Population Safeguards**

#### **Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports WP26-27, which would modify the harvest limit in Unit 13 remainder from "2 bulls" to "up to 2 caribou" under the Federal registration permit (FC1302). This change provides consistency across Unit 13 and restores necessary in-season flexibility to the delegated Federal manager in response to real-time biological conditions and subsistence needs.

This proposal is aligned with AITRC's long-standing involvement in cooperative management of the Nelchina Caribou Herd and reflects both:

- **Ecological Responsiveness:** Allowing the manager to set the sex and number of animals, ensures more balanced and adaptive herd management. There are years when bull-to-cow ratios are skewed, and a strict "2 bulls" limit may be biologically inappropriate.
- **Cultural and Practical Alignment:** For many Ahtna families, harvesting two bulls may not always be viable based on travel costs, season timing, or group size. Granting the flexibility to harvest a cow under certain circumstances supports traditional harvest patterns, nutritional needs, and safety considerations — especially for elders and single-person hunting households.

We also note that the proposal maintains strong safeguards by requiring continued consultation with AITRC, ADFG, OSM, and RAC Chairs, preserving Indigenous oversight in any regulatory adjustment. AITRC

recommends approval of this change as it strengthens local and Tribal co-management while allowing the herd to be managed with integrity, both ecologically and culturally.

**WP26-28a: Extend moose season in Units 11 to close on Sep 30.**

**Position: Support**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) strongly supports WP26-28a to extend the Federal moose hunting season in Unit 11 to close on September 30. Moose hunting is a critical subsistence activity for Ahtna families across the region, and this proposal addresses multiple barriers currently affecting harvest success:

- **Climate Shift and Seasonal Timing:** Warmer fall weather and delayed rut activity have made traditional August and early September hunts less effective. Extending the season provides additional days during a more biologically appropriate period and improves the chance of a successful harvest.
- **Access and Safety:** In many parts of Unit 11, particularly remote areas like the Slana River drainage and Wrangell-St. Elias backcountry — travel and water access become more reliable in late September. A longer season increases safe, effective hunting opportunities for elders, youth, and families who depend on this resource.
- **Food Security and Cultural Continuity:** The ability to provide moose meat remains foundational to Ahtna households. Extending the season strengthens food security and upholds traditional values of shared harvest and intergenerational hunting knowledge.

AITRC recommends continued use of antlered bull-only provisions as a biological safeguard during the extended period. We also encourage future efforts to explore additional late-season opportunities (e.g., limited winter hunts) in consultation with Ahtna Tribes.

With strong community support and no biological concerns, we urge the Federal Subsistence Board to adopt WP26-28a and improve the reliability and accessibility of this essential subsistence hunt.

**WP26-28b: Extend moose season in Units 13 to close on Sep 30.**

**Position: Support**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports WP26-28b to extend the Federal moose hunting season in Unit 13 from the current September 20 closure to September 30. This modest extension directly benefits Ahtna communities throughout Unit 13 — including Gulkana, Tazlina, Copper Center, Cantwell, and Chistochina — by improving flexibility and increasing the chances of harvest success during the fall season.

Our support is based on the following key considerations:

- **Seasonal Mismatch and Rut Timing:** In recent years, the peak of the moose rut has increasingly occurred after September 20, likely due to climate-driven shifts in weather and photoperiod patterns. Extending the season provides a better alignment with rut activity, which is essential for effective and humane harvesting.

- **Low Conservation Risk:** Available biological data indicate that moose populations in Unit 13 are stable, and a season extension limited to antlered bulls does not pose a conservation concern. Continued monitoring and existing antler restrictions will ensure sustainable harvest levels.

**Subsistence Priority and ANILCA Mandate:** The proposal strengthens rural subsistence opportunities consistent with ANILCA Section 804, helping ensure that federally qualified users are able to meet their nutritional and cultural needs in the face of unpredictable environmental and economic pressures.

AITRC recommends adoption of WP26-28b and encourages continued coordination between Federal managers and local Tribes to assess harvest success, hunter access, and population trends throughout the extended season.

#### **WP26-29: Unit 13 Moose – Shift Season 5 Days Later**

**Position: Support**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports WP26-29, which proposes shifting the Unit 13 Federal subsistence moose season five days later, from August 1–September 20 to August 5 – September 25. This change is justified by both harvest data and shifting ecological conditions and would better align Federal regulations with delayed rutting behavior and local harvest success patterns.

The data provided with the proposal clearly shows that the majority of moose are harvested by federally qualified users during the final week of the current season. A later start and end date would increase alignment with this peak activity window, especially as the timing of the rut continues to shift due to climate change.

#### **WP26-30: Unit 13 Moose – Shift Season 10 Days Later**

**Position: Support**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports WP26-30, which proposes shifting the Unit 13 Federal subsistence moose season 10 days later, from August 1–September 20 to August 11–September 30. The proposal is backed by multiple years of harvest data showing that most federally qualified users are successful during the final 7–10 days of the current season. Shifting the season later increases the likelihood of success for Ahtna hunters and addresses shifting ecological patterns caused by climate change.

We also acknowledge that Unit 13 moose have become even more critical in recent years due to limited caribou access and ongoing food security challenges in rural communities.

#### **WP26-31: Unit 13 Moose – Close BLM Lands to Non-Federally Qualified Users**

**Position: Strong Support**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) strongly supports WP26-31, which proposes a permanent closure of BLM-managed Federal public lands in Unit 13 to the harvest of moose by non-federally qualified users. This action builds upon the emergency closure granted under Wildlife Special Action WSA24-06, which applied to BLM lands in Unit 13B during the 2024 season due to high levels of competition, safety concerns, and reduced subsistence opportunity.

We urge the Federal Subsistence Board to adopt WP26-31 as a necessary and legally justified continuation of that emergency closure. The WSA24-06 justification clearly affirmed:

- That competition from non-local hunters on Federal lands has created “a significant disadvantage to federally qualified subsistence users,”
- The situation presents a public safety concern due to crowding and interference,
- And that closure was necessary to preserve the subsistence priority mandated under Title VIII of ANILCA.

These findings directly support the rationale for making the closure permanent and comprehensive, applying to all BLM lands in Unit 13, not just 13B.

**Key Reasons for AITRC’s Strong Support:**

- **Displacement and Unsafe Conditions:** Ahtna subsistence users have repeatedly reported being pushed out of traditional hunting areas by large numbers of State-licensed hunters operating legally on Federal land. These conflicts compromise local families and severely limit their harvest success.
- **Loss of Nelchina Caribou = Moose Dependence:** With the curtailment of Federal caribou opportunity in Unit 13, moose have become the primary and often only large game option available to Ahtna citizens. The Board’s own findings in WSA24-06 recognize that this shift intensifies subsistence needs for moose.
- **Legal and Cultural Mandate:** ANILCA Section 804 requires prioritizing rural and Alaska Native subsistence users when resources are limited or competition exists. Maintaining open Federal lands for non-qualified users directly contradicts this legal requirement and continues to harm Ahtna cultural practices and food security.
- **Consistency with Precedent:** The Federal Subsistence Board has previously closed lands under similar conditions in Units 23, 26A, and other regions where excessive outside pressure limited rural access. The justification for WSA24-06 meets or exceeds those same thresholds.

In summary, WP26-31 is a measured, lawful, and culturally essential response to conditions that AITRC and its member Tribes have raised for over a decade. We urge the Federal Subsistence Board to adopt this proposal in full to ensure that Federal lands in Unit 13 fulfill their legal and moral obligation to support Indigenous subsistence users.

**WP26-71: Unit 12 Brown Bear – Increase Harvest Limit**

**Position: Support**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports WP26-71 to increase the brown bear harvest limit in Unit 12 from one to two bears per regulatory year for federally qualified subsistence users. This proposed change is consistent with the State of Alaska’s existing regulation, provides greater regulatory clarity, and ensures that rural residents have equitable and flexible opportunities to meet their subsistence needs.

AITRC's support is grounded in the following considerations:



- **Regulatory Consistency:** The State already allows resident hunters to harvest two brown bears in Unit 12, and aligning Federal regulations reduces confusion for federally qualified users and enhances harvest reporting accuracy.
- **No Conservation Concern:** The proposal explicitly states that there are no known conservation issues with the brown bear population in Unit 12. With adequate biological monitoring and sealing requirements in place, this increase is sustainable.
- **Limited Access = Low Risk of Overharvest:** Much of Unit 12 includes remote terrain where harvest pressure is naturally low.

AITRC recommends continued harvest monitoring and Tribal consultation in the event of any future concerns but supports this regulation change as a reasonable and beneficial update to enhance subsistence use while safeguarding conservation.

#### **WP26-74: Unit 12 Sheep – Modify Customary and Traditional Use Determination**

**Position: Oppose**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) respectfully opposes WP26-74, which seeks to broaden Customary and Traditional (C&T) Use Determinations for sheep hunting in Unit 12 beyond currently eligible rural communities. While the proposer raises understandable frustrations about inconsistencies in permit distribution and changing game patterns, the request does not meet the established criteria for C&T use as defined under Federal Subsistence Management regulations.

C&T determinations are intended to reflect long-standing, intergenerational patterns of use by rural communities, not generalized access or individual preference. The proposal lacks supporting documentation demonstrating a community-wide pattern of consistent, customary, and traditional sheep harvest from Unit 12 by the applicant's residence (Chitina). In contrast, current communities maintain well-documented histories of sheep harvest in Unit 12 based on:

- **Intergenerational Knowledge Transfer:** Families in these communities have hunted sheep across generations, often on foot or by traditional travel routes.
- **Geographic Proximity:** These communities lie adjacent to the Wrangell and Mentasta ranges where sheep are most accessible.
- **Cultural Significance:** Sheep hunting continues to be woven into local food systems, seasonal calendars, and ceremonial practices.

AITRC recognizes that changes in climate, wildlife abundance, and access infrastructure have altered wildlife patterns. However, expanding C&T eligibility should be based on regional tribal consultation, harvest documentation, and ethnographic records, not solely anecdotal accounts or personal narratives, no matter how heartfelt.

#### **WP26-77: Units 12, 20, and 25 – Recognize Customary and Traditional Use of Wood Bison**

**Position: Support**

**Comment:**

The Ahtna Intertribal Resource Commission (AITRC) supports WP26-77, which seeks to recognize the customary and traditional (C&T) use of wood bison by residents of Units 12, 20, and 25. While wood bison are currently listed as an experimental population under the Endangered Species Act and are not

yet open to harvest, the recognition of their historic and cultural significance to Alaska Native peoples is both timely and necessary.

**AITRC's Rationale for Support:**

- **Documented Traditional Use:** The proposal appropriately cites both oral histories and archaeological evidence demonstrating Alaska Native reliance on wood bison for subsistence purposes prior to their extirpation from the region. The interruption of use was due to external ecological decline — not a cultural shift — and therefore should not invalidate longstanding relationships between communities and this species.
- **Cultural Revitalization:** Acknowledging C&T use rights now ensures that Alaska Native and rural communities will be eligible to participate in any future harvest as part of cultural and nutritional revitalization efforts. This is critical to preserving Indigenous food systems, land-based practices, and language connected to bison hunting and use.
- **Future-Proofing Access:** Establishing C&T determinations ahead of delisting provides a proactive framework that ensures rural and Tribal communities will not be excluded once harvest becomes legally permissible.
- **Respect for Regional Sovereignty:** The inclusion of Units 12, 20, and 25 reflects the geographic scope of traditional wood bison range and use. AITRC encourages continued collaboration with Tribal organizations across these units to guide any future management frameworks, including education, ceremonial harvest, and conservation-based stewardship.

This proposal affirms that wildlife policy can both honor the past and prepare for a more inclusive future. We thank the Eastern Interior Alaska Regional Advisory Council for submitting this forward-looking proposal and urge the Federal Subsistence Board to adopt WP26-77.