

WP26–27 Executive Summary	
General Description	Wildlife Proposal WP26-27 requests to change the caribou harvest limit in Units 13C, 13D, and 13E from “2 bulls” to “up to 2 caribou,” and that authority to determine harvest limit and sex be delegated to the in-season manager. <i>Submitted by the Bureau of Land Management.</i>
Proposed Regulation	Please see Proposed Regulation section of the analysis.
OSM Conclusion	Support Proposal WP26-27 with modification to delegate additional authority to define harvest area and to clarify and simplify the regulatory language.
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	Support as modified by OSM
Interagency Staff Committee Comments	The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.
ADF&G Comments	Oppose
Written Public Comments	1 Support See Written Public Comments on Wildlife Proposal and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Wildlife Analysis WP26-27

ISSUE

Wildlife Proposal WP26-27, submitted by the Bureau of Land Management (BLM) Glennallen Field Office (FO), requests to change the caribou harvest limit in Units 13C, 13D, and 13E from “2 bulls” to “up to 2 caribou,” and that authority to determine harvest limit and sex be delegated to the in-season manager.

Proponent statement

The proponent states this change is necessary to allow for more flexible management of caribou harvest during times of conservation concern. Currently the Federal in-season manager has authority to make in-season adjustments to harvest limits and sex restrictions in Units 13A and 13B, but not in the remainder of Unit 13 (**Figure 1**). Establishing a variable harvest limit will afford the in-season manager the ability to adjust harvest limits in response to fluctuations in the Nelchina Caribou Herd (NCH) population.

Current Federal Regulations

Note: These are the codified regulations adopted by the Federal Subsistence Board (Board) in February 2025 via adoption of WP25-01. They will be published in the Code of Federal Regulations once the fisheries final rule publishes in the Federal Register.

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 in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.

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 Wrangell-St. Elias National Park and Preserve Superintendent, Denali National Park and Preserve Superintendent, 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 in Unit 13C are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13D are closed to caribou hunting except by residents of Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina hunting under these regulations.

Federal public lands in Unit 13E are closed to caribou hunting except by residents of Cantwell, Chase, Denali Village (formerly McKinley Village), and the area between mileposts 216-239 of the Parks Highway (excluding residents of Denali Park Headquarters) hunting under these regulations.

Proposed Federal Regulations

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 in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.

*Unit 13, remainder—~~2 bulls~~ **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 Wrangell-St. Elias National Park and Preserve Superintendent, Denali National Park and Preserve Superintendent, 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 in Unit 13C are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13D are closed to caribou hunting except by residents of Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina hunting under these regulations.

Federal public lands in Unit 13E are closed to caribou hunting except by residents of Cantwell, Chase, Denali Village (formerly McKinley Village), and the area between mileposts 216-239 of the Parks Highway (excluding residents of Denali Park Headquarters) hunting under these regulations.

Current State Regulations

Unit 13–Caribou

No open season.

Extent of Federal Public Lands

Unit 13 is comprised of approximately 15% Federal public lands that consist of 6% National Park Service (NPS) managed lands, 6% BLM managed lands, and 2% U.S. Forest Service (USFS) managed lands. Portions of Chugach National Forest, Denali National Park and Preserve, and Wrangell-St. Elias National Park and Preserve are in Unit 13.

Unit 13A is comprised of approximately 2% Federal public lands that consist of all BLM managed lands.

Unit 13B is comprised of approximately 18% Federal public lands that consist of all BLM managed lands.

Unit 13C is comprised of approximately 3% Federal public lands that consist of 2% BLM and 1% NPS managed lands.

Unit 13D is comprised of approximately 12% Federal public lands that consist of 9% USFS and 3% BLM managed lands.

Unit 13E is comprised of approximately 26% Federal public lands that consist of 20% NPS and 6% BLM managed lands.

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. Most of the portion of Denali National Park located in Unit 13 is open to subsistence, and a smaller portion within Unit 13 is closed to subsistence. Denali National Preserve is open to subsistence.

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.

Customary and Traditional Use Determination

Rural 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.

Currently there is a §804 user prioritization in place for caribou in all of Unit 13. If a hunt is opened, this user prioritization would apply. Federal public lands in Unit 13B would be closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina.

Rural 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 caribou in Unit 13C.

In Unit 13C, the following communities were prioritized through a §804 analysis: Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona. If a caribou hunt is opened in the subunit, only these communities would be eligible.

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

In Unit 13A, the following communities were prioritized through a §804 analysis: Chickaloon, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona. Similarly, in Unit 13D, the following communities were prioritized: Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina. If a caribou hunt is opened in the subunit, only these communities would be eligible.

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

In Unit 13E, the following communities were prioritized through a §804 analysis: Cantwell, Chase, Denali Village (formerly McKinley Village), and the area between mileposts 216-239 of the Parks Highway (excluding residents of Denali Park Headquarters. If a caribou hunt is opened in the subunit, only these communities would be eligible.

Under the guidelines of Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.

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. Because resident zone communities must also have a customary and traditional use determination for caribou in the area to be eligible to hunt them within the park, Cantwell is the only community that is eligible to subsistence hunt in the portion of Denali National Park in Unit 13E.

Additionally, Kevin Mayo, Blaine Mayo, and members of their households have individual customary and traditional use determinations for caribou in Unit 13 in areas managed by the National Park Service where subsistence uses are allowed. Names of individuals do not appear in regulation, but they are on a list maintained by Denali National Park and Preserve. These individuals have a long family history of hunting in Denali National Park and Preserve, but currently reside in Healy. Healy does not have a customary and traditional use determination for caribou in Unit 13. Kevin and Blaine Mayo and members of their households were included in the §804 user prioritization.

Regulatory History

The following regulatory history is abbreviated for the purposes of this proposal. A full description of Federal and State regulatory actions relevant to the Nelchina Caribou Herd (NCH) can be found in the Office of Subsistence Management (OSM) analysis of Wildlife Proposal WP24-09 (OSM 2023).

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 for 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 State of Alaska 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. As the Federal harvest limit was two caribou, 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. 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 Alaska Department of Fish and Game (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 FO 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. However, 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 Emergency Order (EO) when quotas were exceeded (ADF&G 2022b & 2022c). 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 2022a), as ADF&G determined the NCH population was too low to offer these opportunities. Since these are all registration and drawing permits, ADF&G does not have to issue an EO to close these hunts each season; they just do not offer the permits. Hence, the State hunts will be closed until ADF&G decides there is a harvestable surplus and offers Tier II permits (BOG 2025). Indeed, the State hunt has remained closed since 2023.

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.

In June 2024, the Board considered WSA24-02, submitted by the WRST Subsistence Resource Commission, which requested closure of Federal public lands in Units 11, 12 remainder, and 13 to caribou hunting by all users for the 2024/25 regulatory year and asked that an ANILCA §804 user prioritization analysis be conducted for the NCH. The Board also considered WSA24-03, submitted by the BLM Glennallen FO, which made the same request. Both requests were due to continued decline of the NCH population. The Board approved WSA24-02 with modification to provide exceptions for traditional religious ceremonies and cultural/educational program permit harvest and to postpone a decision on the §804 user prioritization analysis until the February 2025 Board fisheries regulatory meeting.

In January 2025, the BOG considered Proposal 49, requesting a six-year closure to harvest of Nelchina caribou, or until the herd reaches the midpoint of population objectives. The ADF&G uses an adaptive management strategy to allow for harvest when a harvestable surplus is available. The BOG felt this was the best management strategy for the NCH rather than a six-year moratorium on harvest and opposed this proposal.

In February 2025, the FSB adopted WP25-01 as modified by the Southcentral and Eastern Interior Alaska Councils. This proposal was submitted by OSM in response to the Board’s action on WSA24-02, which postponed a decision on the §804 analysis. Proposal WP25-01 requested conducting a §804 user prioritization analysis that specified which communities would be eligible to hunt for Nelchina

caribou, changing all Nelchina caribou hunts in Units 11, 12, and 13 to “may be announced” seasons, and delegating authority to Federal in-season managers to manage the hunts in unit-specific regulations. The modification added communities to the OSM preliminary conclusion, which the two Councils felt relied on the NCH.

Biological Background

The NCH calving grounds and summer range both lie within Unit 13. The rut generally occurs within Unit 13 from late September through mid-October. Recently, the NCH has shown much annual variability in their winter range, with portions of the herd overwintering in Units 11, 12, 13, 20E, or sometimes even migrating into Canada (ADF&G 2023b, Hatcher 2024, pers. comm.). 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). When the NCH overwinters in Unit 20E, competition with the Fortymile Caribou Herd (FCH) may occur.

State management goals and harvest objectives are based on the principle of sustained yield (maximum harvestable amount while maintaining herd viability) (Robbins 2015). Since the mid-1990s, ADF&G has experimentally managed the NCH using hunter harvest to maintain the herd below carrying capacity of the range. This experimental management regime proves difficult to maintain if annual composition or count data are not collected. Harvest quotas in subsequent years must be adjusted to compensate for miscalculations in abundance made from a lack of data (Hatcher and Robbins 2021). The goal is to prevent overuse of the NCH range and large swings in abundance, which may lead to drastic declines and extended recovery periods. ADF&G’s management objectives are 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, and to provide for the harvest of 3,000–6,000 caribou annually (Hatcher and Robbins 2021).

Despite the stringent harvest management, population of the NCH has fluctuated over time, influenced primarily by harvest (Schwanke and Robbins 2013). Between 2003 and 2024, the NCH summer minimum count and fall population estimates ranged from 6,983–53,500 caribou and averaged 35,218 caribou (**Figure 2, Table 2**). The herd has exceeded State population objectives many times, and harvest regulations have been liberalized to quickly reduce the population to preserve habitat conditions. NCH population increases may be a result of a series of mild winters, favorable growing seasons, relatively low harvest rates (Hatcher 2024, pers. comm.), as well as the Intensive Management programs for the FCH in Unit 12 and for moose in Unit 13 with wolf predation control, as there may be less predation on Nelchina caribou and neonate calves (ADF&G 2023c). Brown bear predation is usually a more frequent source of mortality on caribou neonates, whereas wolf predation typically occurs later in the caribou life cycle. While brown bears are not a target of the Intensive Management program in either Unit 12 or 13, harvest regulations have been loosened to allow for increased harvest (ADF&G 2023b). Both wolf and brown bear populations are currently low enough that further removal would not positively affect the caribou population (ADF&G 2023b). The Unit 13 predator control program was initiated in 2000 and is currently active. The Unit 12 program was originally established in 2004, although this program is currently inactive (ADF&G 2023c).

In 2019, the NCH summer minimum count peaked at 53,500 caribou (ADF&G 2019b). The NCH abundance has declined precipitously since then to only 6,983 caribou (minimum count estimate) in October 2023 (**Figure 2**), which is the lowest estimate since 2003 (ADF&G 2023a, 2024a). ADF&G also performed a Rigest estimate from the 2023 summer minimum count and estimated 8,344 animals (ADF&G 2024b). In July and October 2024, the minimum count increased to 12,098 caribou and 11,738 caribou (12,526 Rigest), respectively, which is still well below management objectives (ADF&G 2024a & 2024b). Factors contributing to this recent decline are believed to include severe winters, late springs, and early/deep snows across the range of the NCH from 2021–2023. The severe and variable winter weather, such as deep snow, led to higher than usual overwinter mortality of both adults and calves for two winters in a row (2021/22 and 2022/23) (Hatcher 2024, pers. comm., ADF&G 2023b). Later spring thaws may delay migration to the calving grounds (ADF&G 2017). The late arrival of spring in 2021 and 2022 may have affected caribou migrations, as calving occurred later than normal in both springs. The FCH, which shares winter range with the NCH, also calved later than normal in the spring of 2022 (ADF&G 2023b). The winter of 2023/24 saw NCH caribou wintering outside of the Copper Basin, where there was much less snow, and the herd was able conserve energy by not having to travel great distances. While calf survival rates were low from 2021–2023, hampering recovery, they were relatively high for 2024, with an estimated 27% surviving to spring 2024 (ADF&G 2023b, 2024b).

Bull:cow and calf:cow ratios have fluctuated greatly over time. Between 2003 and 2024, the fall bull:cow ratio ranged from 23–64 bulls:100 cows and averaged 38 bulls:100 cows, with two of the three lowest estimates occurring in July 2023 and October 2024 (**Table 2**). The summer observation was used in the fall 2023 estimate as the fall composition results were inconclusive, because the caribou were still sexually segregated during the survey (ADF&G 2024a). The fall calf:100 cow ratio for the same timeframe ranged from 3–55 calves:100 cows and averaged 35 calves:100 cows (**Table 2**). The composition survey conducted in October 2024 showed a substantial increase in the calf:cow ratio from the low in 2023, and increased calf weight and height, which may lead to increased recruitment for 2025.

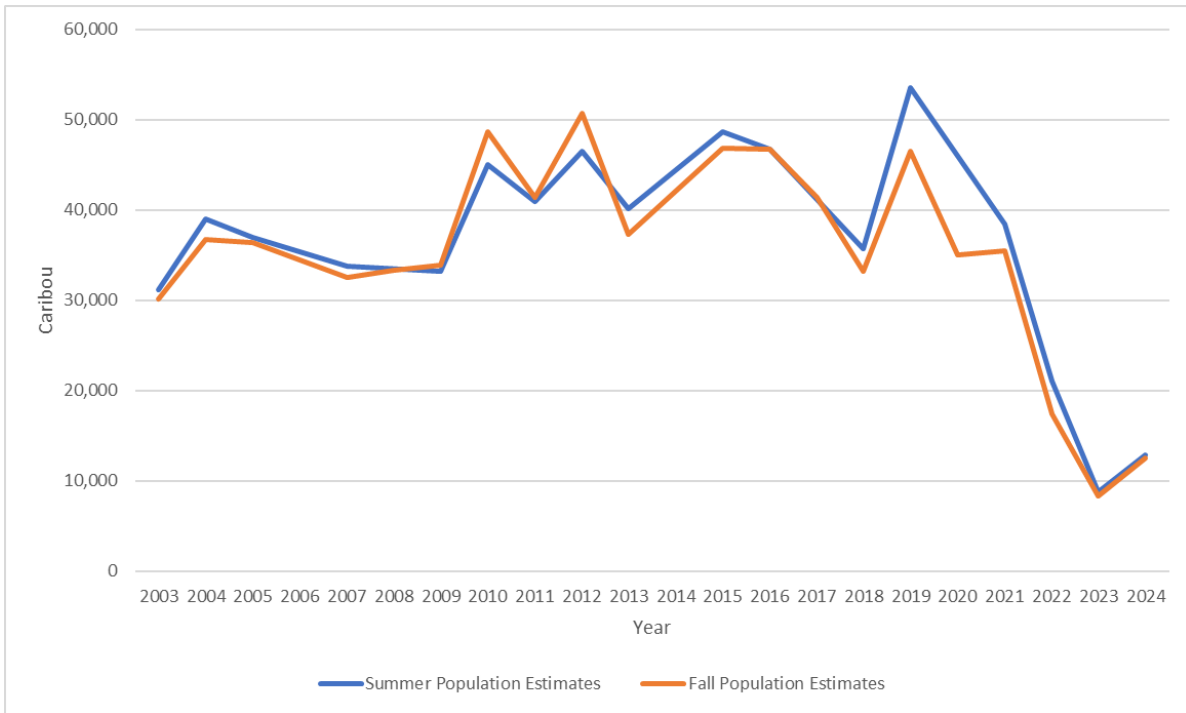


Figure 2. Summer and fall population estimates for the NCH (ADF&G 2024a & 2024b). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

Table 1. Population estimates and fall composition metrics of the NCH (Tobey and Kelleyhouse 2007; ADF&G 2008, 2010b, 2019a, 2023a, 2023b, 2024a, 2024b; 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
2024	26	41	12,910	12,526
Average	38	35	36,009	35,149

^a Fall composition counts

^b Summer photocensus

^c Modeled estimate

^d Summer ratio

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 2023).

The Mentasta Caribou Herd range partially overlaps with the NCH range. The herd traditionally calves and summers along the northern and western slopes of the Wrangell Mountains in Unit 11 (Hatcher 2020; Putera and Miller 2018). Mentasta herd numbers are low, and all harvest has been closed since the 1990s. Federal harvest limits for NCH hunts in Units 11 and 12 remainder include provisions designed to minimize incidental harvest of Mentasta caribou, including a bulls-only harvest limit in Unit 11, harvest limits of a single caribou in both units, and delegations of authority to close areas when Mentasta caribou are present. Recent collar data indicate Mentasta caribou mix with the NCH, including in Unit 13.

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 approximates the long-term average (2001–2022) of 2,762 permits (**Table 4**). However, the 2022/23 reported Federal harvest of 166 caribou was much lower than the long-term average (2001–2022) of 371 caribou (OSM 2023). 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 2023). 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).

Table 3. Total harvest of Nelchina caribou in Unit 13, including State harvest quota, State harvest, and Federal harvest (Tobey and Kelleyhouse 2007; Schwanke and Robbins 2013; Robbins 2015, pers. comm.; BLM 2020; OSM 2023). Note hunts were closed in 2023 and 2024.

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, 2024	0	0	0	0

Table 4. The number of permits issued, permits used, and caribou harvested under permit FC1302 Federal caribou hunt in Unit 13 (OSM 2023). Note hunts were closed in 2023 and 2024.

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, 2024	0	0	0	0	0	0
AVERAGE (2001-2022)	2,762	1,327	267	102	4	372

Alternative(s) Considered

Proposal WP26-01 requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and to rescind the associated DALs. While the delegated authority for Unit 13 caribou was already transferred into unit-specific regulations via Proposal WP25-01, Proposal WP26-01 contains some additional clarifying, boiler plate language that should apply to all delegated authority in unit-specific regulations. Specifically, Federal regulations for delegated authority (§ __.10(d)(6)) specify the Board may delegate authority “within frameworks established by the Board.” To clarify this in the unit-specific regulations, the phrase “within the regulatory parameters set by the Board” was added.

An alternative offered by NPS staff would protect the Mentasta Caribou Herd, which ranges into Unit 13C. Rather than changing the harvest limit in Unit 13C to “up to two caribou,” maintaining it as “up

to two bulls” would provide the management flexibility this proposal is requesting, while also addressing conservation concerns associated with the incidental harvest of female Mentasta caribou. Allowing the harvest of “up to two caribou” of either sex in Unit 13C has the potential to jeopardize the sustainability and long-term conservation of the Mentasta Caribou Herd, although Federal lands only comprise 3% of Unit 13C. This proposed change may reduce the effectiveness of existing Federal regulations in Unit 13C that are intended to minimize incidental take of Mentasta cow caribou. However, the in-season manager would be given the ability to “define harvest areas,” which would allow for different harvest regulations, such as harvest limits, in different subunits.

Discussion and Effects

If this proposal is adopted, the Unit 13 remainder harvest limit for caribou will become “up to 2 caribou,” and the BLM Glennallen FO Manager will be delegated authority to set the harvest limit and sex restriction for caribou in Unit 13 remainder. Adopting this proposal will also align Unit 13 remainder caribou regulations with Units 13A and 13B, reducing regulatory complexity and confusion.

Delegating authority will allow for responsive, in-season management actions to protect the NCH population from possible overharvest or to allow additional subsistence harvest opportunity as conditions allow. Currently, no NCH hunts are occurring due to conservation concerns, but as the herd recovers and population levels allow for some harvestable surplus, the management flexibility provided by this proposal will be useful. For example, during times of population decline and conservation concern, the ability to restrict the harvest limit to only one caribou or one bull could help protect the NCH from further declines, while still allowing some harvest opportunity for federally qualified subsistence users.

OSM CONCLUSION

Support Proposal WP26-27 with modification to delegate additional authority to define harvest areas and to clarify and simplify the regulatory language.

The draft regulations read:

Unit 13–Caribou

Units 13 A 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~~ **after coordination** with ~~the~~ **Wrangell-St. Elias National Park and Preserve, Denali National Park and Preserve**, Alaska Department of Fish and Game, Office of Subsistence Management, Ahtna Intertribal Resource*

May be announced between Oct. 21– Mar. 31

*Commission, and Chair of the affected Councils, ~~may~~ **is authorized within the regulatory parameters set by the Board, to announce season dates, harvest quotas, open/close seasons, **define harvest areas**, and set sex restrictions and harvest limits.***

Federal public lands in Unit 13A are closed to caribou hunting except by residents of Chickaloon, Chitina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Lake Louise, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13B are closed to caribou hunting except by residents of Chitina, Chickaloon, Chistochina, Copper Center/Silver Springs, Gakona, Glacier View, Glennallen, Gulkana, Kenny Lake/Willow Creek, Lake Louise, McCarthy, Nelchina, Paxson, Sheep Mountain, Slana, Tazlina, Tolsona, and Tonsina hunting under these regulations.

~~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 Wrangell-St. Elias National Park and Preserve Superintendent, Denali National Park and Preserve Superintendent, 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 in Unit 13C are closed to caribou hunting except by residents of Chistochina, Gakona, Glennallen, Gulkana, Mentasta Lake, Mentasta Pass, Slana/Nabesna Road, Tazlina, and Tolsona hunting under these regulations.

Federal public lands in Unit 13D are closed to caribou hunting except by residents of Chitina, Copper Center, Glennallen, Kenny Lake/Willow Creek, Tazlina, Tolsona, and Tonsina hunting under these regulations.

Federal public lands in Unit 13E are closed to caribou hunting except by residents of Cantwell, Chase, Denali Village (formerly McKinley Village), and the area between mileposts 216-239 of the Parks Highway (excluding residents of Denali Park Headquarters) hunting under these

regulations.

Justification

Delegating authority to manage the NCH hunt provides management flexibility to quickly respond to changing herd and hunt conditions, optimizing conservation and subsistence opportunity. Adopting WP26-27 will allow for quick in-season management decisions to be made for protection of the NCH when a conservation concern arises in Unit 13 remainder. Similarly, changing the harvest limit to ‘up to 2 caribou’ balances conservation and subsistence opportunity. This proposal aligns harvest limits and delegated authority for caribou across Unit 13, creating consistency in management and subsistence opportunity.

Changing the harvest limit and delegated authority results in the regulations for all subunits in 13 being exactly the same, nullifying the need for separate hunt areas. Combining the hunt areas reduces regulatory complexity. Delegating additional authority to define harvest areas allows the in-season manager to announce different harvest limits for different hunt areas to protect Mentasta caribou. As Unit 13 caribou are managed under one Federal permit, any differences can be noted on the permit. Clarifying the delegated authority language ensures compliance with and consistency across Federal regulations.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southcentral Alaska Subsistence Regional Advisory Council

Support as modified by OSM. The Council stated this proposal would provide additional management flexibility to the Federal manager when the Nelchina herd recovers to a level at which harvest could be sustained again. It also includes a requirement for the manager to work with Ahtna Intertribal Resource Commission in addition to the State manager and OSM when making in-season decisions. This modification would also allow the manager to implement the recommendation of the Wrangell-St. Elias National Park Subsistence Resource Commission to define harvest areas.

Eastern Interior Alaska Subsistence Regional Advisory Council

Did not consider.

INTERAGENCY STAFF COMMITTEE COMMENT

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

Wildlife Proposal WP26-27

This proposal seeks to change the caribou harvest limit in Game Management Units (GMU) 13C, 13D, and 13E from “2 bulls” to “up to 2 caribou,” and that authority to determine harvest limit and sex be delegated to the in-season manager.

Position

The Alaska Department of Fish & Game (ADF&G) **OPPOSES** this proposal. At this time the Nelchina caribou herd (NCH) has not recovered to a level in which any proposed liberalization of the federal regulations should be considered. In addition, ADF&G has had difficulties with the Bureau of Land Management (BLM) Glenallen Field Office conducting the consultation requirement when carrying out its authorities under the existing delegation of authority letter and therefore lacks the confidence that the BLM in-season manager would not utilize this provision prematurely.

ADF&G’s management objectives are 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. Preliminary data from 2025 indicates a bull to cow ratio and population estimate continue to be below management objectives. Under state regulations hunting has been closed and will not offer caribou hunting opportunity in GMU 13 until such time as harvestable surplus is available to provide for sustainable opportunity. Passage of this proposal

is seen as contrary to Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and recent directives from the President and Secretary of the Interior because it is not necessary.

For multiple years area and regional ADF&G staff have had issues with communication regarding federal hunts for the NCH and the BLM Glenallen Field Office. This issue came to a head as the herd began to decline and consultation became even more important. In 2022, last minute consultation did occur but not until BLM had already issued permits for the federal hunt so it was too late for BLM to consider the conservation measures ADF&G was making to NCH management. Then in 2023, communication did happen earlier, but multiple BLM staff reached out to area/regional ADF&G staff, so it was uncertain about who was actually making decisions from BLM.

ANILCA §1314(a) explicitly states: "Nothing in this Act is intended to enlarge or diminish the responsibility and authority of the State of Alaska for management of fish and wildlife on the public lands except as may be provided in Title VIII..." Title VIII provides only a narrow exception allowing the Secretary to restrict State-authorized harvest when necessary to meet the needs of federally qualified rural residents. Section 802(2) establishes the policy that "nonwasteful subsistence uses of fish and wildlife and other renewable resources shall be the priority consumptive use of all such resources on the public lands of Alaska **when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population...**" [emphasis added]. Section 804 reiterates this policy and establishes criteria to implement a priority when the above conditions are met. It does not authorize wholesale replacement of State management. Per §815(3) of ANILCA, "...restriction on nonsubsistence uses are only authorized when necessary for the conservation of healthy wildlife populations or to continue subsistence uses."

Executive Order 15153, Sec. 3(b)(xxii) directs the Department of the Interior to conduct meaningful consultation with State fish and wildlife agencies prior to enacting land management plans or regulations affecting hunting and fishing opportunities on public lands. This directive was reinforced by Secretarial Order 3447, which calls for removing unnecessary barriers to hunting and fishing, expanding access where compatible, improving coordination with State agencies, and ensuring transparent review of any proposed restrictions.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission