

WP26-31 Executive Summary	
General Description	Proposal WP26-31 requests that the Bureau of Land Management lands in Unit 13 be closed to moose hunting by non-federally qualified users. <i>Submitted by: Kirk Wilson</i>
Proposed Regulation	<p>Unit 13—Moose</p> <p><i>Unit 13E—1 antlered bull moose by Federal registration permit (FM1301) only; only 1 permit will be issued per household</i> <i>Aug. 1—Sep. 20</i></p> <p><i>Bureau of Land Management lands are closed to moose hunting except by federally qualified subsistence users hunting under these regulations.</i></p> <p><i>Unit 13, remainder—1 antlered bull moose by Federal registration permit (FM1301) only.</i> <i>Aug. 1—Sep. 20</i></p> <p><i>Bureau of Land Management lands are closed to moose hunting except by federally qualified subsistence users hunting under these regulations.</i></p>
OSM Conclusion	Oppose
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	Support
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	Did not consider
Interagency Staff Committee Comments	See full comment at the end of this analysis

WP26–31 Executive Summary	
ADF&G Comments	Oppose
Written Public Comments	1 Support See Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Wildlife Analysis WP26-31

ISSUE

Proposal WP26-31, submitted by Kirk Wilson, requests that the Bureau of Land Management (BLM) lands in Unit 13 be closed to moose hunting by non-federally qualified users.

Proponent Statement

The proponent states that this proposal was initially submitted as a special action (WSA24-06). The Board adopted the special action with modification, closing only Unit 13B to moose hunting by non-federally qualified subsistence users for the 2024/25 and 2025/26 regulatory years.

The food security situation for residents of Unit 13 is now more dire than when the special action was submitted. Without the Nelchina caribou herd, federally qualified subsistence users rely heavily on moose as an alternative resource, but there is so much competition that people are unable to continue their subsistence uses of the species.

People come from all over Alaska and beyond to hunt in Unit 13 because it is on the road system. We cannot compete with urban hunters. Often there are so many hunters that rural residents avoid important hunting areas entirely. The Federal lands available for hunting in Unit 13 are relatively small. However, having space to pursue subsistence hunting for moose safely and without conflict would be hugely beneficial for communities that are struggling.

The proponent also included a table showing that 22 – 40 moose-vehicle collisions were reported annually in the Copper Basin region 2021– 2024, while 8 – 30 road-killed moose were salvaged for human consumption each year over the same time period.

These numbers reflect a general decline in moose roadkill incidents, which may be indicative of broader population trends in Unit 13.

Roadkill salvage has become a critical source of wild protein for many rural subsistence users in the Unit 13 region. Some community members rely almost entirely on salvaged game due to limited access to moose and other traditional sources of wild meat.

This decline in available moose has significant consequences: 1) Nutritional Impacts: Reduced access to wild meat forces reliance on store-bought foods, which are often highly processed and nutritionally inferior. This shift contributes to worsening health outcomes in rural communities. 2) Cultural Erosion: moose harvesting is not only a means of subsistence but also a core part of traditional and cultural practices. Losing access to moose threatens the intergenerational transmission of cultural knowledge and skills. 3) Increased Competition: The growing presence of urban-based hunters in Unit 13 has

made it more difficult for local subsistence users to access customary hunting areas and successfully harvest a moose.

Per the Alaska National Interest Lands Conservation Act (ANILCA), federally qualified hunters are to have a priority over non-federally qualified hunters. This priority is diminished when non-federally qualified hunters are using State permits on Federal lands. As a federally qualified user, I am not able to use my Federal permit on State lands. Alaska Native peoples should have the right and should be encouraged to continue hunting and gathering in their traditional ways. Ensuring meaningful access to moose and other wild foods is essential to upholding these rights and passing on traditional knowledge.

The proponent concludes by asking that the Federal Subsistence Board consider these trends and their impact on the health, well-being, and cultural survival of rural communities. Continued support for regulatory protections, rural priority, and enforcement of subsistence rights is crucial. Without such measures, we will continue to see hardship among our communities and the erosion of Alaska Native ways of life.

Current Federal Regulations

Note: These are the codified Federal regulations

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit (FM1301) only; only 1 permit will be issued per household Aug. 1—Sep. 20

Unit 13, remainder—1 antlered bull moose by Federal registration permit (FM1301) only. Aug. 1—Sep. 20

Note: These are the 2024/25 and 2025/26 Federal regulations

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit (FM1301) only; only 1 permit will be issued per household Aug. 1—Sep. 20

Unit 13, remainder—1 antlered bull moose by Federal registration permit (FM1301) only. Aug. 1—Sep. 20

Federal public lands in Unit 13B are closed to moose hunting for the 2024/25 and 2025/26 regulatory years except by federally qualified subsistence users hunting under these regulations.

Proposed Federal Regulations

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit (FM1301) only; only 1 permit will be issued per household Aug. 1—Sep. 20

Bureau of Land Management lands are closed to moose hunting except by federally qualified subsistence users hunting under these regulations.

Unit 13, remainder—1 antlered bull moose by Federal registration permit (FM1301) only. Aug. 1—Sep. 20

Bureau of Land Management lands are closed to moose hunting except by federally qualified subsistence users hunting under these regulations.

Current State Regulations

Unit 13—Moose

Residents: One bull by permit, available only by application. See the Subsistence Permit Hunt Supplement for details. CM300 Aug. 20—Sept. 20

OR

Residents: One bull, with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on at least one side; HT Sept. 1—Sept. 20

OR

Residents: One bull by permit. (Unit 13D only) DM348 Sept. 1—Sept. 20

Nonresidents: One bull with 50-inch antlers or antlers with 4 or more brow tines on at least one side. DM335-DM339 Sept. 1—Sept. 20

Extent of Federal Public Lands

Please see analysis for WP26-28b/29/30 and **Figure 1**.

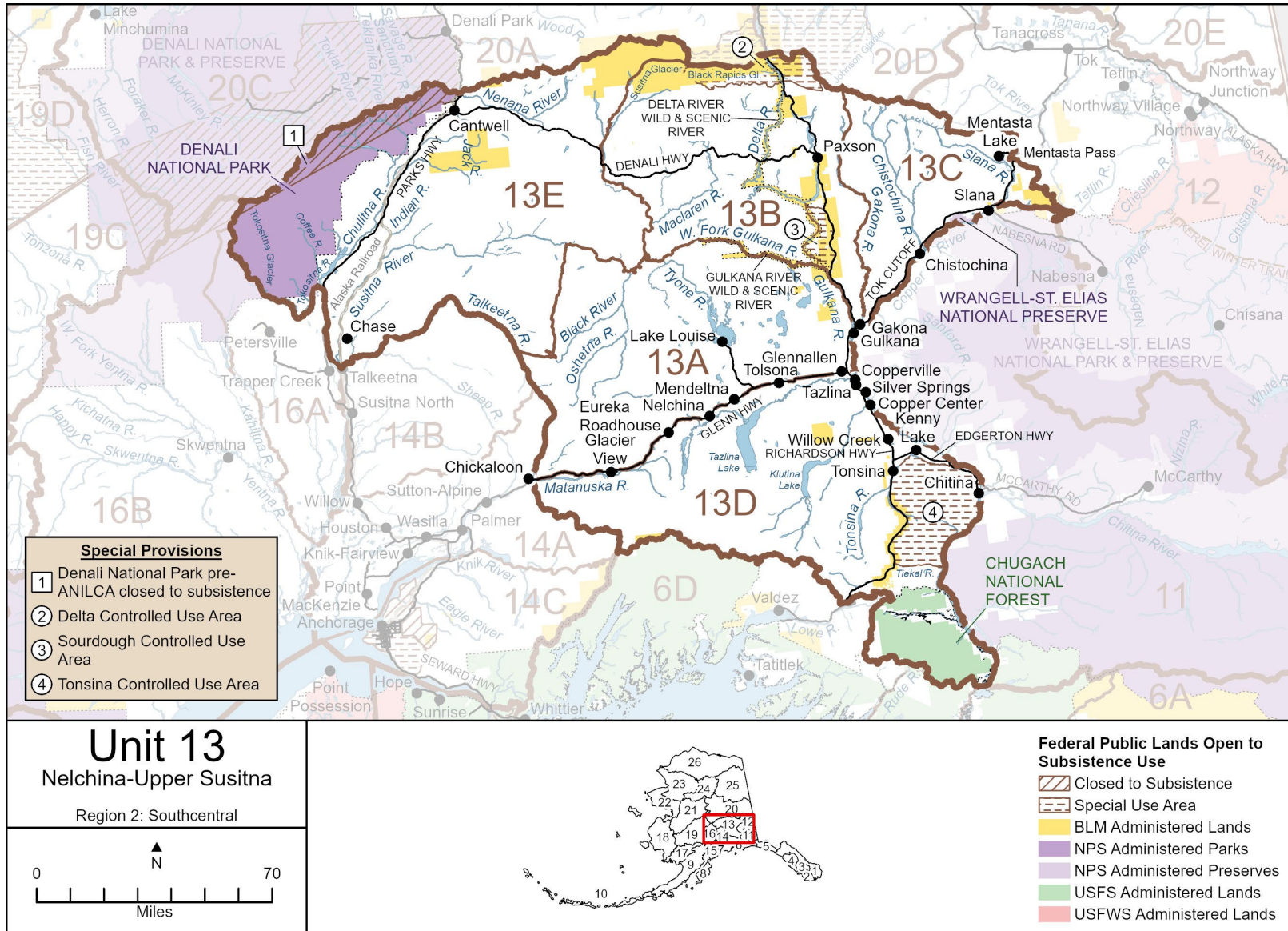


Figure 1. Federal public lands open to subsistence use in Unit 13.

Customary and Traditional Use Determination

Please see analysis for WP26-28b/29/30.

Regulatory History

Please see the Regulatory History section in the Proposal WP26-28b/29/30 analysis.

Current Events

In August 2025, the Federal Subsistence Board (Board) rejected Emergency Wildlife Special Action, WSA25-04, which requested closure of Federal public lands in Unit 13C to non-federally qualified users for the 2025 season. The Board rejected the request because there were no imminent conservation concerns for moose in Unit 13C or threats to the continuation of their subsistence uses necessitating a closure for the 2025 season. The Board recognized the small amount of Federal public lands in Unit 13C may be important for rural residents but felt that more evidence was needed to justify the requested restriction (FSB 2025).

Proposals WP26-28b/29/30 all request changes to the Unit 13 moose season. Proposal WP26-28b requests to extend the moose season in Unit 13 by 10 days, to close on September 30. Proposal WP26-29 requests to shift the moose season in Unit 13 five days later to Aug. 6-Sep. 25. Proposal WP26-30 requests to shift the moose season in Unit 13 ten days later to Aug. 11-Sep. 30.

In September 2025, ADF&G issued two emergency orders (R4-3-25; R4-5-25) changing the harvest limit for the community hunts in Units 13E and 13C from one bull moose to one bull moose with spike or fork antlers, or antlers 50-inches wide or wider, or antlers with four or more brow tines on at least one side (general season antler restrictions). The quotas of 24 any bulls for Unit 13E and 5 any bulls for Unit 13C were met, resulting in the harvest limit change (ADF&G 2025b, 2025c).

All Unit 13 caribou hunts (including Federal, State Tier I, and State community subsistence hunts) are closed for the 2025/26 season due to significant declines in the Nelchina Caribou Herd, and there were similar closures in 2024/25 and 2023/24 (ADF&G 2023, FSB 2024a). Closures to this important subsistence resource are likely to make harvest of moose especially critical. In 2023, only 38 moose were harvested by federally qualified subsistence users hunting under Federal subsistence regulations (FM1301), which is dramatically lower than the long-term average (see **Table 5** in WP26-28a/29/30). Increasingly unpredictable weather and warmer falls further contribute to hunting difficulties (OSM 2024), which was the case in 2023 (WRST SRC 2023).

Biological Background

Please see the Biological Background section in the Proposal WP26-28b/29/30 analysis.

Cultural Knowledge and Traditional Practices

Communities with a customary and traditional use determination for moose in Unit 13 fall within Units 11, 12, 13, 14, and 20 (**Table 1**). Units 11 and 13 coincide with the traditional territory of the Ahtna Athabascans (de Laguna and McClellan 1981). Unit 12 and portions of Unit 20 fall within the upper Tanana region, populated historically by speakers of Tanacross and Upper Tanana Athabaskan languages, with whom the Ahtna have historically maintained ties based on reciprocity and kinship (McKenna 1981, Reckord 1983, Haynes and Simeone 2007).

The communities of this region are highly reliant on harvest of fish and wildlife, with an average of 97% of households using subsistence resources (ADF&G 2025). Salmon, moose, and caribou are among the most heavily harvested subsistence resources in the Copper River Basin and are particularly important for local food security (de Laguna and McClellan 1981; Holen, et al. 2012, 2015; Kukkonen and Zimbleman 2012; La Vine et al. 2013; La Vine & Zimbleman 2014).

Moose are typically hunted in late summer through late winter (ADF&G 2017c, Haynes & Simeone 2007, Reckord 1983, Simeone 2006), with harvest surveys showing that August and September are the primary months for moose harvest (Holen et al. 2015). The traditional practices of drying and freezing meat, as well as the proper and respectful treatment of harvested resources such as moose and caribou, are described in several ethnographic accounts of the Ahtna (de Laguna & McClellan 1981, Reckord 1983, Simeone 2006).

Based on the most recent available data, communities with a customary and traditional use determination for moose in portions of Unit 13 harvested an average of 49.1 pounds of moose per person per survey year (ADF&G 2025, **Table 1**). The number of moose harvested varies widely across communities and across years, likely in relation to local ecological conditions, community preference, hunter effort and competition, and regulations. During the most recent subsistence surveys of communities within Unit 13 (1982 – 2022), harvest ranged from no moose harvested in Mendeltna to a high of 112.5 pounds of moose harvested per person in Tolsona (**Table 1**). Considering all communities with a customary and traditional use determination for moose in Unit 13, Tetlin had an even higher harvest of 142.6 pounds of moose per person (**Table 1**). Sharing of moose is widespread. For instance, although no residents of Mendeltna reported harvesting moose in 2013, 100% of the households reported using moose (Holen et al. 2015). For all communities with a customary and traditional use determination for moose in Unit 13, moose comprised an average of 23% of their total harvest by weight (**Table 1**).

Hunting Competition

Recent subsistence research, technical papers, and public testimony at special action hearings, Council meetings, and Board sessions provide a record of public sentiment on hunting pressure and competition in Unit 13. Southcentral Council members and local residents of Unit 13 have repeatedly voiced their concerns about competition and conflict with non-local hunters for large land mammals (e.g. Simeone 2006; SCRAC 2015, 2016, 2021, 2022a, 2022b, 2025; OSM 2019, 2020, 2024). In household surveys between 2009 and 2013, local residents in nearly all communities in the region reported that they faced

challenges hunting moose because of non-local residents (Kukkonen and Zimpelman 2012, La Vine et al. 2013, La Vine and Zimpelman 2014, Holen et al. 2015). Competition can lead local residents to stop trying to hunt moose altogether (Simeone 2006).

Many residents of communities with a customary and traditional use determination for moose in Unit 13 felt that the State community hunt (CM300) should be available to local residents only (Holen et al. 2012, 2015; Kukkonen and Zimpleman 2012; La Vine et al. 2013; La Vine and Zimpelman 2014; SCRAC 2022b). Public testimony on hunting competition in Unit 13 was provided at the public hearings for WSA19-03 and WSA 20-03, which requested caribou and moose hunting closures for non-federally qualified subsistence users. Local users testified that non-local hunters have more financial resources, more equipment, and are less dependent on moose and caribou than local residents, and that competition with the large number of other users makes it difficult for local users to provide for their families (OSM 2019, 2020). Some residents see the popularity of non-local hunting in Unit 13 as a safety issue (SCRAC 2015).

In 2024, a public hearing was held for WSA24-06, the special action request that led to the current temporary closure to moose hunting by non-federally qualified users on Federal public lands in Unit 13B only (OSM 2024). Residents of the region stated that local users are not seeing as many moose in their areas, are not seeing sufficient levels of calf recruitment, and that there are conservation concerns for moose populations. Individuals noted that bull:cow ratios are not the only relevant metric to understanding moose population concerns, but that data on moose and calf survival rates are also needed.

One individual shared that federally qualified subsistence users are unable to hunt in early August before the State hunt opens because moose are still at higher elevations and have not yet entered their more active period. They also noted that the number of moose harvested on Federal lands has declined over time, and that in 2023 was at its third lowest point in history. Residents stated that the increasing accessibility of rural Alaska areas and increasing urban population size poses threats to subsistence practices, and that ANILCA was created to address these concerns. Both the proponent and one other speaker highlighted that moose hunting will be especially critical considering the closure to caribou hunting in Unit 13. They reported that local users do not travel to other areas to harvest caribou and therefore are reliant on moose in their local areas.

Impacts of Recent Closures to Non-federally Qualified Users

In regulatory years 2020/21 and 2021/22, Federal lands in Units 13A and 13B were closed to moose and caribou hunting by non-federally qualified users (WSA20-03). Most recently, moose hunting was closed to non-federally qualified users on Federal public lands in Unit 13B for the 2024/25 and 2025/26 regulatory years (WSA24-06). Harvest reporting data do not clearly indicate that these closures resulted in increased numbers of federally qualified subsistence users harvesting moose on Federal lands (see **Table 5** in WP26-28b/29/30). The proponent of WSA24-06 stated that hunting conditions in Units 13A and 13B were safer during the previous closure (WSA20-03).

Environmental conditions may also make it difficult to assess the impacts of the previous closures to non-federally qualified subsistence users. For example, information from subsistence users and local managers indicates that people struggled to find moose in fall 2020, and that the start of the fall 2021 season was very hot, likely impacting moose harvest success rates and/or hunting effort (SCRAC 2021).

Table 1. Most recent available data from household subsistence surveys on estimated harvest of moose by communities with a customary and traditional use determination for moose in all or a portion of Unit 13 (ADF&G 2025). Note that data about moose harvest from subsistence surveys are not available for Healy Lake (ADF&G 2025).

Community	Survey Year	% of HH Using	% of HH Attempting to Harvest	% of HH Harvesting	Estimated number of Moose Harvested	Pounds of Moose Harvested per Person	Moose as Percentage of Total Harvest
Northway	2014	96%	66%	24%	17	76.8	25%
Tetlin	2004	94%	81%	55%	22	142.6	No data
Tok	2011	70%	55%	28%	48	76.9	38%
Tanacross	2004	57%	65%	51%	21	110.5	No data
Lake Louise	2013	70%	50%	10%	1	23.7	32%
Nelchina	2013	61%	61%	33%	6	57.4	45%
Glacier View	1982	63%	No data	20%	8	44.9	0%
Glennallen	2013	71%	40%	10%	8	17.1	17%
Mendeltna	2013	100%	80%	0%	0	0	0%
Tolsona	2013	88%	50%	25%	4	112.5	36%
Gulkana	2013	90%	52%	17%	5	24.7	17%
Paxson	2013	50%	75%	25%	2	39.1	18%
Gakona	2012	81%	48%	17%	7	28.6	17%
Chistochina	2022	83%	78%	33%	6	65.9	43%
Mentasta Lake	2022	100%	70%	15%	4	28.1	41%
Slana/Nabesna Rd	2023	56%	56%	12%	7	37.5	31%
Chitina	2012	67%	48%	4%	2	7.9	3%
Copper Center/Silver Springs	2010	66%	61%	18%	16	33	16%
Kenny Lake	2012	60%	38%	8%	5	15.3	11%
Tazlina	2013	77%	62%	11%	10	19.4	13%
Tonsina	2013	70%	35%	9%	2	17	9%
Cantwell	2012	73%	44%	24%	15	51.9	51%
Chase	2012	69%	63%	19%	3	43.5	22%
Chickaloon	1982	61%	No data	44%	8	95.2	0%
Denali Park	2015	61%	7%	0%	0	0	0%
Dot Lake	2011	93%	50%	14%	2	32.7	28%
Dry Creek	2011	100%	52%	37%	14	92.2	66%
Average		75%	55%	21%	9	49.1	23%

Harvest History

Please see the Harvest History section in the Proposal WP26-28b/29/30 analysis.

Alternative(s) Considered

One alternative considered was to only close some of the BLM managed lands in Unit 13, rather than all of them. In 2020, the Board limited the closure to moose and caribou hunting by non-federally qualified users to Units 13A and 13B only because those were the subunits where user conflicts, overcrowding, and safety concerns occurred. In 2024, the Board limited the closure to moose hunting by non-federally qualified users in Unit 13B due to conservation concerns and heavy harvest pressure in Unit 13B, warranting the closure for both the conservation of healthy populations of moose and to allow for continuation of subsistence uses (FSB 2024b).

Additionally, the moose populations in some subunits have declined substantially since 2010 and are well below State management objectives, while the moose populations in the other subunits have remained relatively stable and are within or just below management objectives (see **Figure 2** in WP26-28b/29/30). Hunting pressure and the amount of accessible BLM managed lands also varies by subunit. Reported harvest data shows that Units 13A, 13B, and 13E are the most heavily used by hunters under State regulations, while federally qualified subsistence users rely most heavily on Unit 13B and to a lesser extent, Unit 13D for moose hunting (see **Table 6** in WP26-28b/29/30). Very few Federal hunters and harvest occur in Units 13A and 13C, which may be a result of the little amount of Federal lands in these subunits. BLM lands comprise 18% of Unit 13B and much of it is accessible along the Richardson Highway and Delta and Gulkana rivers, while Unit 13A, for example, only contains 2% of less accessible BLM managed lands (see Extent of Federal Public Lands section in WP26-28b/29/30 analysis). Unit 13D is second to Unit 13B for the number of Federal hunters and harvest (see **Table 6** in WP26-28b/29/30). BLM managed lands only comprise 3% of Unit 13D, but these lands are in highly accessible areas along the Richardson Highway and within local communities' documented moose hunting areas (Holen et al. 2015).

Another alternative considered was to extend or shift the season as requested by Proposals WP26-28b/29/30, circumventing any unnecessary restrictions on NFQUS. This alternative may better allow for the continuation of subsistence uses and increased opportunity for FQSUs as the State hunt would be closed during the extended season, eliminating all competition with other users. Additionally, hunting conditions would be more conducive to harvest and meat care due to the rut and cooler weather. However, as the Federal harvest limit is any-bull, any increases in harvest could potentially contribute to conservation concerns by negatively affecting bull:cow ratios. However, while bull:cow ratios are below management objectives in some subunits, they are well above levels for biological concern (see **Figure 3** in WP26-28b/29/30). Additionally, Federal harvest has only comprised 7% of total moose harvest from Unit 13 on average (2001–2023), suggesting the expected small increases in harvest resulting from these proposed changes may not be biologically meaningful.

Discussion and Effects

If WP26-31 is adopted, unencumbered BLM lands in Unit 13 will be closed to moose hunting by non-federally qualified users. These are the BLM lands depicted in the Unit 13 map included in the Federal wildlife regulations booklet (**Figure 1**). The encumbered BLM lands in Unit 13 (i.e. lands selected for conveyance to other entities such as the State or Alaska Native corporations) are not open to hunting under Federal regulations and are *not* depicted in the Unit 13 map included in the Federal regulations booklet or in **Figure 1**.

Per ANILCA Title VIII, 50 CFR §100.19(b), and the Board's closure policy, Federal public lands may be closed to non-federally qualified users for the conservation of healthy wildlife populations, to continue subsistence uses of wildlife, or for public safety reasons. The proponent of this proposal primarily focuses on the continuation of subsistence uses, but also touches on public safety and, to a lesser extent, conservation concerns.

Closure for conservation of healthy moose populations may be warranted in Units 13B and 13D where the moose population has declined substantially according to ADF&G surveys in trend count areas (see **Figure 2** in WP26-28b/29/30). The Unit 13B moose population has steadily declined 49% since 2010 and is currently 32% below recently reduced State management objectives. While bull:cow ratios have remained within State management objectives, fall calf:cow ratios have consistently been below objectives and were very low in 2023 at only 10 calves:100 cows. Additionally, yearling bull:cow ratios have also consistently been below objectives, indicating few bulls may be available for harvest in the future (ADF&G 2011, 2012, 2013, 2014, 2015, 2016, 2017d, 2018, 2019, 2020a, 2021, 2022, 2023, 2024a, 2025; Robbins 2018; Hatcher 2024, pers. comm.; BOG 2025 as cited in Proposal WP26-28b/29/30). However, the State's general moose hunt in Unit 13 has antler restrictions, substantially mitigating conservation concerns. While the State's community hunt is any-bull, ADF&G reduces the any-bull quota if bull:cow ratios are below management objectives and implements antler restrictions once the quota is met, further mitigating conservation concerns for the Unit 13 moose population.

Unit 13D's moose population estimate declined precipitously in 2023. While the estimate improved somewhat in 2024, it is still below management objectives. However, minimum counts vary annually due to many factors and one poor survey year (in 2023) combined with the establishment of an additional count area and inclusion in predator control in 2022 warrant more years of data before drawing decisive conclusions on the status of the Unit 13D moose population. Additionally, the bull:cow ratios in Unit 13D have consistently been extremely high since 2010, averaging 81 bulls:100 cows, indicating there are surplus bulls available for harvest. While the calf:cow ratio in Unit 13D has historically been low, the 2023 estimate was quite high at 48 calves:100 cows (see Biological Background section in WP26-28b/29/30 analysis).

Closure for conservation reasons is not warranted in Units 13A or 13E where the moose populations have remained relatively stable and are within or just below management objectives. While the Unit 13C moose population estimate had consistently been within management objectives, the 2024 estimate decreased substantially, while management objectives increased. Therefore, the most recent

Unit 13C moose population estimate is well below (28%) current management objectives. However, similar to Unit 13D, additional years of population estimates are needed before drawing decisive conclusions on the status of the Unit 13C moose population (see **Figure 2** in WP26-28b/29/30).

Closure for continuation of subsistence uses of moose may be warranted in Unit 13B. Moose hunters and harvest are concentrated in Unit 13B under both Federal and State regulations (see **Figure 4, Table 6** in WP26-28b/29/30). Unit 13B also has the highest percentage of accessible BLM lands (i.e. along roads and rivers) in Unit 13. Moose harvest success rates are lower for users hunting under Federal subsistence regulations than under State regulations, although the amount of Federal lands is proportionally small and many FQSUs may harvest under State regulations. If WP26-31 is adopted, federally qualified subsistence users may experience less competition from non-federally qualified users along some road corridors, resulting in improved hunting conditions and possibly increased success in harvesting moose.

Closure for continuation of subsistence uses of moose does not appear to be warranted in the other subunits. Subunits 13A and 13E are both heavily used by people hunting moose under State regulations (see **Table 6** in WP26-28b/29/30), but BLM lands comprise only a very small portion of Unit 13A (2%) and Unit 13E (6%). Additionally, very few Federal hunters utilize, and very little Federal harvest occurs in these subunits. Therefore, closures in these subunits would likely afford few benefits to federally qualified subsistence users and could represent unnecessary restrictions to nonsubsistence uses. Proportionally, few Federal and State moose hunters report hunting in Unit 13C (**Table 6**), which also only contains 2% BLM lands, suggesting that a closure in this subunit would also afford few benefits to federally qualified subsistence users. However, the proponent for WSA25-04 indicated that hunters specifically target the Federal public lands in Unit 13C as they are easily accessible along the highway, and he has experienced difficulty reaching his preferred hunting locations in recent years because of crowding and competition from non-federally qualified users.

While local managers report that the highly accessible BLM lands in Unit 13D are important for local users, moose harvest success for federally qualified subsistence users appears higher in this subunit than for people hunting under State regulations (see **Table 6** in WP26-28b/29/30). Additionally, proportionally few people hunting under State regulations hunt in this subunit (see **Table 6** in WP26-28b/29/30). Therefore, a closure in subunit 13D for the continuation of subsistence uses does not appear warranted at this time.

When considering closures for one species, it is important to consider the entire subsistence harvest of a community or region. The harvest of large land mammals, especially moose and caribou, is critical to Athabascan cultural identity. Caribou have traditionally comprised a significant portion of people's total subsistence harvest, so the recent Federal and State closures to caribou hunting in Unit 13 are significant lost opportunities and threats to food security for Copper River Basin residents. There have also been closures to King Salmon harvest in the area during recent years. Augmenting opportunities to harvest moose will allow for the continuation of vital cultural practices and may help mitigate food security concerns, which relates to public safety.

Local users report that the large number of hunters and ATV use in Unit 13, especially in Units 13A and 13B, are driving moose away from preferred harvest areas (Holen et al. 2015, OSM 2024). Data collected in other areas show that moose become less active and rely on more densely vegetated areas in response to high hunter activity, which decreases visibility and likelihood of hunter success (Brown et al. 2018).

While Federal moose seasons open one month earlier than the State general season, both seasons close on September 20 (although Proposals WP26-28b/29/30 request later Federal season closing dates). As most moose are harvested in mid-September because of cooler weather and increased bull susceptibility to harvest due to rut, the longer Federal subsistence hunting season in August may not provide much subsistence priority. Testimony during the WSA24-06 public hearing stated the August season does not provide much Federal subsistence priority because moose are still in the high country, are not moving around, and are not accessible on Federal public lands (OSM 2024). Local users report that moose are displaying less active behavior and going into rut later in warmer falls. Moose may also be less active and harder to detect in response to heat stress during warmer weather. As a result, moose are more challenging to encounter and harvest, especially during the earlier season dates that are open only to federally qualified subsistence users. Local users report that it is now more common to harvest moose 2 – 4 weeks later than in previous years. This means that the ideal time to harvest moose occurs during the State hunting season.

Closure for safety concerns does not appear warranted. While safety concerns resulting from intense hunting pressure, overcrowding of hunters, disruption of hunts, and unsafe shooting practices have been repeatedly cited by all user groups (OSM 2020), these concerns primarily pertain to caribou hunting in Unit 13, not moose hunting. When caribou migrate across the BLM lands along the Richardson highway in Unit 13B, hunter activity is concentrated, creating public safety concerns. However, all Unit 13 caribou hunts are closed, which may greatly reduce the number of hunters in the area and associated safety concerns. Moose are not concentrated in time and space like migrating caribou. Additionally, non-federally qualified users would still be able to travel through, utilize, and camp on BLM managed lands. This closure could also further concentrate non-local hunters along road-accessible State managed lands. Closure along the Gulkana and Delta Rivers may cause user confusion and law enforcement concerns as moose could still be harvested on areas below the mean high-water mark, which are managed under State regulations.

The outcome of Proposals WP26-28b/29/30, which request to extend or shift the Federal moose season later in the year may affect the impact of adopting this proposal.

OSM CONCLUSION

Oppose Proposal WP26-31

Justification

A closure to moose hunting by NFQUs is not warranted at this time for either conservation concerns or the continuation of subsistence uses. Adequate bull:cow ratios and/or moose population estimates

coupled with the conservative harvest limits under State regulations (i.e. antler restrictions under the general hunt, and reductions in the any-bull quota if bull:cow ratios are below management objectives in the community hunt) indicate closure for conservation concerns is not necessary.

Available evidence indicates that federally qualified subsistence users in Unit 13 face significant challenges to harvesting sufficient moose and will face challenges to meeting subsistence needs due to recent closures to caribou harvest. While OSM recognizes these challenges, OSM supports extending the moose season in Unit 13 as requested by Proposal WP26-28b rather than closing to NFQUs to provide for the continuation of subsistence uses and a meaningful subsistence priority. Extending the season provides opportunity for users to hunt without any competition from State hunters as the State hunt will be closed. The extended season also provides better hunting conditions due to the later onset of rut in recent years and cooler weather that makes meat storage in the field easier. Therefore, OSM considers extending the season more appropriate and beneficial than restricting NFQUs.

LITERATURE CITED

- ADF&G. 2017. Overview of Use Patterns, Regulations, and Harvest History of Moose in Game Management Unit 13. Alaska Department of Fish and Game Division of Subsistence. Special Publication No. 2017-04. Anchorage, AK.
- ADF&G. 2023. Hunting and trapping emergency order NO. R4-01-23. Alaska Department of Fish and Game. June 30, 2023. Glennallen, AK.
- ADF&G. 2024. Community Subsistence Information System database. <https://www.adfg.alaska.gov/sb/CSIS/>. Accessed July 12, 2024. Anchorage, AK
- ADF&Ga. 2025. Community Subsistence Information System (CSIS), Alaska Department of Fish and Game, Div. of Subsistence. <https://www.adfg.alaska.gov/sb/CSIS/>. Retrieved: May 8, 2025.
- ADF&Gb. 2025. Unit 13E Community Hunt Moose Bag Limit Change. R-3-25. Alaska Department of Fish and Game. Glennallen, AK. <https://www.adfg.alaska.gov/static/applications/publicnotification/2025/orders/R4-3-25.pdf>. Accessed September 18, 2025.
- ADF&Gc. 2025. Unit 13C Community Hunt Moose Bag Limit Change. R-5-25. Alaska Department of Fish and Game. Glennallen, AK. <https://www.adfg.alaska.gov/static/applications/publicnotification/2025/orders/R4-5-25.pdf>. Accessed September 18, 2025.
- Brown, C. L., Kielland, K., Brinkman, T. J., Gilbert, S. L., & Euskirchen, E. S. 2018. Resource selection and movement of male moose in response to varying levels of off-road vehicle access. *Ecosphere*, 9(9), e02405. <https://doi.org/10.1002/ecs2.2405>
- 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.
- Easton, N.A. 2021. An ethnohistory of the Chisana River Basin. Wrangell-St. Elias National Park and Preserve, Copper Center, AK.

FSB. 2024a. Federal Subsistence Board closes Federal public lands to caribou hunting by all users in Units 11, 12 remainder, and 13 for 2024-2024. Federal Subsistence Board News Release, June 18, 2024.

FSB. 2024b. Federal Subsistence Board Extends Unit 12 Moose Season and Closes Federal Public Lands in Unit 13B to Moose Hunting by Non-Federally Qualified Users for 2024 and 2025 Seasons. Federal Subsistence Board News Release, Aug. 9, 2024.

FSB. 2025. Federal Subsistence Board Acts on Emergency Wildlife Special Action Request WSA25-04 Regarding Moose in Unit 13C. Federal Subsistence Board News Release, Aug. 20, 2025.

Haynes, T.L. and W.E. Simeone. 2007. Upper Tanana ethnographic overview and assessment, Wrangell St. Elias National Park and Preserve. ADF&G, Division of Subsistence. Technical Paper No. 325. Anchorage, AK.

Holen, D., S. M. Hazell, and D. S. Koster, eds. 2012. The harvest and use of wild resources by communities in the Eastern Interior, Alaska, 2011. ADF&G, Division of Subsistence. Technical Paper No. 372. Anchorage, AK.

Holen, D., S. M. Hazell, and G. Zimpelman, eds. 2015. The harvest and use of wild resources in selected communities of the Copper River Basin and East Glenn Highway, Alaska, 2013. ADF&G, 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. ADF&G, Division of Subsistence, Technical Paper No. 370. Anchorage, AK.

La Vine, R., M. Kukkonen, B. Jones, and G. Zimpelman, editors. 2013. Subsistence harvests and uses of wild resources in Copper Center, Slana/Nabesna Road, Mentasta Lake, and Mentasta Pass, Alaska, 2010. ADF&G, Division of Subsistence. Technical Paper No. 380. Anchorage, AK.

La Vine, R. and G. Zimpelman, editors. 2014. Subsistence harvests and uses of wild resources in Kenny Lake/Willow Creek, Gakona, McCarthy, and Chitina, Alaska, 2012. ADF&G, Division of Subsistence. Technical Paper No. 394. Anchorage, AK.

McKenna, R. 1981. Tanana. Pages 562-576 in J. Helm, ed. Handbook of North American Indians. Subarctic: Volume 6. Smithsonian Institution. Washington, D.C.

OSM. 2019. Staff analysis WSA19-03. Office of Subsistence Management. Anchorage, AK.

OSM. 2020. Staff analysis WSA20-03. Office of Subsistence Management. Anchorage, AK.

OSM. 2024. Staff analysis WSA24-06. Office of Subsistence Management. Anchorage, AK.

Reckord, H. 1983. Where raven stood: Cultural resources of the Ahtna region. University of Alaska Fairbanks, Occasional Paper Number 35. Anthropology and Historic Preservation Cooperative Park Studies Unit. Fairbanks, AK.

SCRAC. 2015. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings, October 21, 2015. Copper Center, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

SCRAC 2016. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings, October 17-18, 2016. Anchorage, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

SCRAC. 2021a. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings, February 25, 2021. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

SCRAC. 2021b. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings, October 13-14, 2021. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

SCRAC 2022a. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings, October 12-13, 2022. Anchorage, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

SCRAC. 2022b. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings, February 10, 2022. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

SCRAC 2025. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings, March 12. Cordova, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

Simeone, W. E. 2006. some ethnographic and historical information on the use of large land mammals in the Copper River Basin. Resource Report, NPS/AR/CRR-2006-56. National Park Service, Alaska Region. Copper Center, AK.

WRST SRC. 2023. Wrangell-St. Elias National Park Subsistence Resource Commission Meeting Transcript. September 28, 2023. Copper Center, Alaska.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southcentral Alaska Subsistence Regional Advisory Council

Support. The Council recognized that extending the Unit 13 moose season, as the recommended for Proposal WP26-28b, would provide additional opportunity to subsistence users. However, they noted that there is an extreme level of competition with State users for moose in this area. Non-federally qualified users arrive in large numbers with high-powered off-road vehicles, outcompeting locals. Federally qualified subsistence users do not have comparable equipment and are not able to access areas where they feel they can safely hunt. If locals can get far enough off the road system to hunt safely, meat care becomes problematic. The increased amount of time to get meat out of the field, combined with warmer fall weather, makes safe handling of harvested meat a concern. This competition is also eroding local cultural practices, as most wildlife is now coming from road-kill list. This makes passing along knowledge and tradition almost impossible and makes it very difficult to keep a culture alive. The proponent stated that not all the communities with C&T for moose in Unit 13 are qualified to hunt in the Wrangell—St. Elias National Park and Preserve. That exclusion makes these BLM lands even more important. The Ahtna Intertribal Resource Commission Community Harvest report indicates no moose harvests have occurred in their Federal community harvest system for the last three years despite substantial hunting effort, suggesting locals are being outcompeted. Their hunter questionnaire cites reduced moose populations, environmental conditions, access issues, and increased competition as reasons for this lack of success.

INTERAGENCY STAFF COMMITTEE COMMENT

The Federal Subsistence Board (Board) will need to consider a few key sections of ANILCA before taking action on proposals requesting closures and closure reviews. Specifically, those sections of Title VIII pertaining to Council Deference and the limitations to closures or restrictions of subsistence and nonsubsistence uses on federal public lands.

ANILCA Section 815(3) clarifies that “nothing in this title shall be construed as...authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on public lands unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in 816, to continue subsistence uses of such populations, or pursuant to other applicable law.”

ANILCA Section 816(b) allows for closure or restriction of Federal public lands to subsistence uses of fish and wildlife for “for reasons of public safety, administration, or to assure the continued viability of a particular fish or wildlife population.”

ANILCA Section 805(c) the Board must consider the recommendations of the Councils “concerning the taking of fish and wildlife” on public lands in their regions and may choose not to follow such a recommendation only if it is not supported by substantial evidence, violates recognized principles of fish and wildlife conservation, or would be detrimental to the satisfaction of subsistence needs.

These three sections speak to the heart of Board authority and require a careful balance between the federal priority, the continuation of subsistence uses, the necessary conservation of subsistence fish and wildlife, and unnecessary restrictions. The ISC appreciates the Council's concerns for local hunters who face competition from non-federally qualified users and warmer weather affecting the safe handling of their harvest. The ISC also recognizes the efforts of the Council to provide local subsistence users additional opportunity without competition through their support of WP26-28a. In the case of WP26-31, the ISC suggests the Council recommendation may not meet the criteria for deference.

ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

Wildlife Proposal WP26-31

This proposal would close federal public land in Game Management Unit (GMU) 13 to moose hunting by non-federally qualified users (NFQU).

Position

The Alaska Department of Fish & Game (**ADF&G**) **OPPOSES** this proposal. At this time, ADF&G can find no reason to enact this closure under the Alaska National Interest Lands Conservation Act (ANILCA). There is no evidence to substantiate the proponents claim that there are conservation concerns for the moose population in GMU 13, the closure is needed to ensure the continuation of subsistence uses or there are public safety issues that would be alleviated by enacting this closure.

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.

It should be recognized that this closure has been enacted in the past for the hunting of moose in GMU 13 without showing any success regarding increased harvest rates by federally qualified users (FQU). Closures to non-federally qualified users (NFQU) on federal public land over this timeframe came after FQUs had the second highest success rates of hunting under the federal regulations since 2006. From there, subsequent success rates under the closures have not been able to meet the high success rate before the closure.

Background

The moose population in GMU 13 is not at a level where a restriction is necessary for either conservation or the continuation of subsistence uses. ADF&G is not contemplating any restrictions currently under state regulations. While some of GMU 13 subunits' moose populations are experiencing slight declines, overall, the population in GMU 13 is doing well. The current levels of bull harvest do not pose a biological concern for the viability of healthy moose populations in Unit 13, given the bull-to-cow ratios observed during moose surveys annually.

It should be recognized that there was already a closure just a few years ago for the hunting of moose in GMU 13 during regulatory years (RY) 2020 and 2021 without showing any success regarding increased harvest rates by FQUs. Closures to NFQUs on federal public land over this timeframe came after federally qualified users (FQU) had the second highest success rate of hunting under the federal harvest permit (FM1301) since 2006 at 14.3%. From there, the success rates under the closure for RY20–21 were 10.2% and 11.9% respectively, which was right at or below the long-term average (Figure 1).

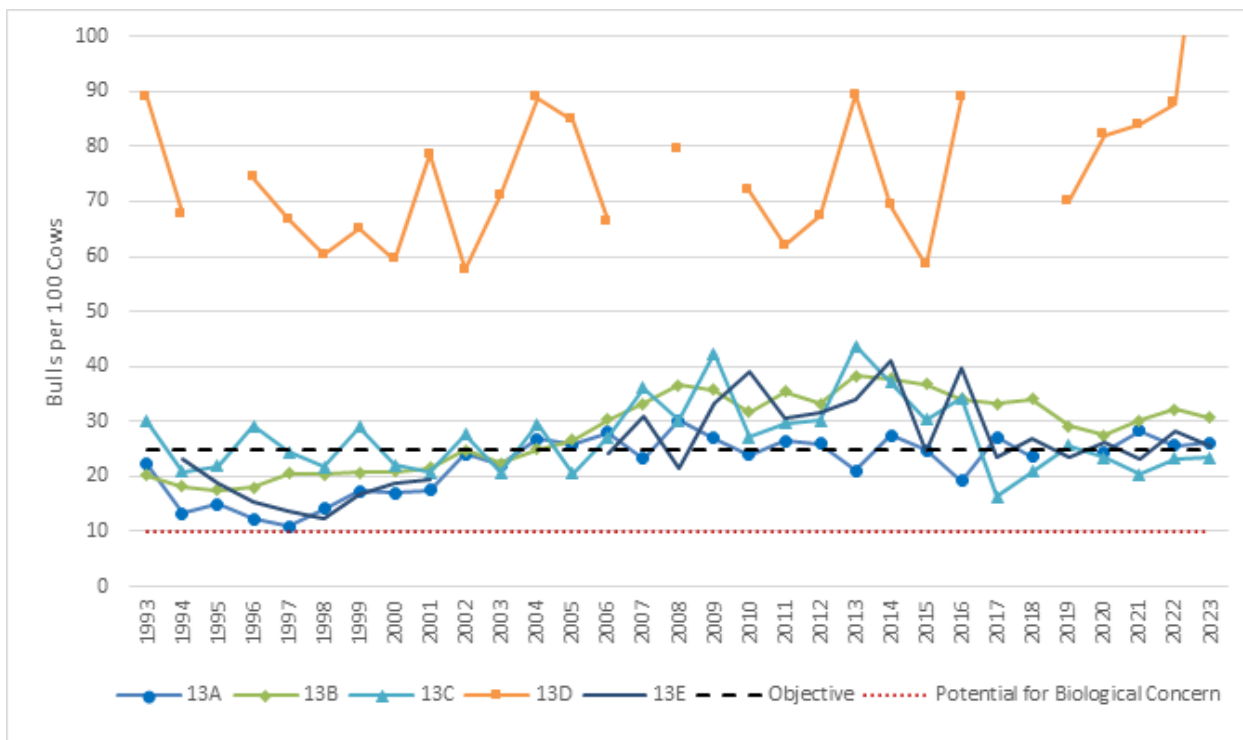


Figure 1.-Moose bull:cow ratios in GMU13, RY93-23.

Federally qualified users currently have almost a 20-day advantage before the state season opens and participate in subsistence and general season hunts for moose offered by the state, which allow these hunters to access wildlife resources on all public lands in Unit 13. They may choose to hunt state and/or private lands in addition to federal public land by participating in the general harvest hunt or the Community Subsistence Harvest opportunity (CM300).

Impact on Federally Qualified Users

If adopted, FQUs would have exclusive opportunity to hunt for moose on federal public land in GMU 13.

Impact on Other Users

If adopted, NFQU will be precluded from hunting moose on federal public lands in GMU 13 during the state moose hunting season (August 20-September 20), though that will not prevent NFQUs from accessing/crossing federal public lands, during open moose seasons, for other reasons/activities.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game (BOG) has made positive customary and traditional use findings for moose in GMU 13.

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the BOG to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This Amount Reasonably Necessary for Subsistence (ANS).

The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

An ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for moose in Unit 13 is 300–600 animals. We have consistently exceeded the upper range of this amount every year since 2006, and this past season the upper end of the ANS was nearly reached with a harvest of 553 moose. This decline in total harvest was expected as the number of moose hunters hunting under state and/or federal regulations decreased with the closure of caribou hunting in Unit 13.

Conservation Issues

There are currently no conservation concerns for moose in GMU 13.

Enforcement Issues

If adopted, it would be the responsibility of federal agencies to enforce the restriction.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission