

<b>WP26-68 Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP26-68, requests to increase the harvest limit and extend the season for ptarmigan in Unit 23 to match State regulations. <i>Submitted by: Northwest Arctic Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Proposed Federal Regulations</b></p> <p><b>Unit 23– Ptarmigan (rock, willow, and white-tailed)</b></p> <p><i>Unit 23— 20 50 per day, 40 100 in possession</i> <span style="float: right;"><i>Aug. 10- <del>Apr.</del> 30 June 15</i></span></p>
<b>OSM Conclusion</b>	<b>Support</b>
<b>Northwest Arctic Subsistence Regional Advisory Council Recommendation</b>	<b>Support</b>
<b>North Slope Subsistence Regional Advisory Council Recommendation</b>	<b>Support</b>
<b>Interagency Staff Committee Comments</b>	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.
<b>ADF&amp;G Comments</b>	<b>Support</b>
<b>Written Public Comments</b>	<b>None</b>

**Wildlife Analysis  
WP26-68**

**ISSUE**

Wildlife Proposal WP26-68, submitted by the Northwest Arctic Subsistence Regional Advisory Council (Council), requests to increase the harvest limit and extend the season for ptarmigan in Unit 23 to match State regulations. Specifically, Proposal WP26-68 requests increasing the harvest limit to 50 per day, 100 in possession and extending the season to close June 15.

**Proponent Statement**

The proponent states that with the loss of caribou and salmon, users have needed to depend on other species to meet their subsistence needs. Aligning the Federal ptarmigan hunt to match the State hunt will help reduce confusion and increase opportunity. Hunters have indicated an increased ptarmigan population in Unit 23.

**Current Federal Regulations**

**Unit 23– Ptarmigan (rock, willow, and white-tailed)**

*Unit 23— 20 per day, 40 in possession. Aug. 10-Apr. 30*

**Proposed Federal Regulations**

**Unit 23– Ptarmigan (rock, willow, and white-tailed)**

*Unit 23— ~~20~~ 50 per day, ~~40~~ 100 in possession Aug. 10- ~~Apr. 30~~ June 15*

**Current State Regulations**

**Unit 23– Ptarmigan (rock, willow, and white-tailed)**

*Units 23 Residents and Nonresidents—50 per day, 100 in possession Aug 10-June 15*

## **Extent of Federal Public Lands**

Unit 23 is comprised of approximately 69% Federal public lands that consist of 42% National Park Service (NPS) managed lands, 18% Bureau of Land Management (BLM) managed lands and, 9% U.S. Fish and Wildlife Service (USFWS) managed lands.

## **Customary and Traditional Use Determination**

Rural residents of Units 11, 13, 15, 16, 20D, 22, 23, and Chickaloon have a customary and traditional use determination for ptarmigan in Unit 23.

*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 Kobuk Valley National Park (KOVA) and Cape Krusenstern National Monument (CAKR) include all NANA Regional Corporation communities (all Unit 23 communities except Point Hope). In order to be able to hunt ptarmigan in KOVA and CAKR, communities must have both a customary and traditional use determination for the species in the area and be resident zone communities. All the resident zone communities for KOVA and CAKR also have a customary and traditional use determination for ptarmigan in Unit 23.

## **Regulatory History**

Federal subsistence regulations for ptarmigan in Unit 23 have not changed since 1990, when the Federal subsistence management program began. At that time, the current regulation was adopted from State regulation.

In October 1999, the Alaska Board of Game (BOG) adopted Proposal 31 to increase the season and harvest limits for ptarmigan in Unit 23 to the current regulations (50/day, 100 in possession; Aug. 10-Jun. 15), effective July 1, 2000. The BOG discussed that ptarmigan were abundant and few were harvested in Unit 23. The regulatory change would not affect ptarmigan abundance but would provide additional opportunity and simplify regulations (BOG 1999).

## **Current Events**

The Cape Krusenstern Subsistence Resource Committee (SRC) met during the winter of 2025 and drafted a proposal to align Federal ptarmigan regulations with State regulations in Unit 23 to reduce regulatory complexity and confusion. However, the Cape Krusenstern SRC did not have a quorum to officially vote to submit the proposal (Creek 2025, pers. comm.).

In February 2025, the Kobuk Valley SRC voted to submit a proposal to align Federal ptarmigan regulations with State regulations in Unit 23 to reduce regulatory complexity and confusion. This proposal was considered by the Northwest Arctic Council during their winter 2025 meeting before the Council voted to submit this proposal, WP26-68 (Creek 2025, pers. comm.).

### **Biological Background**

There are three species of ptarmigan (rock, willow and white-tailed) found in Alaska. White-tailed ptarmigan range is primarily in the mountain ranges of southcentral and southeastern Alaska. Rock and willow ptarmigan are found in Unit 23 (ADF&G 2025a, ADF&G 2025b).

Willow ptarmigan is the most common and abundant ptarmigan species in Alaska, occurring in most alpine and subalpine unforested habitats throughout the state. Willow ptarmigans are commonly found in subalpine areas, montane valley bottoms and in willow-lined waterways (Merizon and Carroll 2023, ADF&G 2025a, ADF&G 2025b).

Rock ptarmigan is the second most abundance ptarmigan species in Alaska. Rock ptarmigans are larger than white-tailed but smaller than willow ptarmigan. Rock ptarmigan typically inhabit higher elevation habitat, more exposed rock faces, scree slopes, and alpine ridges. Alpine areas with abundant dwarf birch provide good habitat and are likely places to observe rock ptarmigan (Merizon and Carroll 2023). The summer range of rock ptarmigan abuts the willow ptarmigan range, but they appear to prefer very low herbaceous, and dwarf alpine plants that are intermingled with rock and gravel ridges along with alpine valleys (ADF&G 2025a, ADF&G 2025b).

Population dynamics of ptarmigan in Unit 23 are not well documented, although testimony provided during the Northwest Arctic Council meeting suggests that ptarmigan are abundant in at least one community, Ambler (NWARAC 2025). Unit 23 is part of the Western Rural region, which includes Units 17, 18, 22, 23, and 26A. Currently, no spring breeding surveys occur in this region for rock ptarmigan, while surveys for willow ptarmigan have only occurred along the Nome road system in Unit 22 (Carroll and Spivey 2024, Merizon and Carroll 2023).

### **Harvest History**

Rock and willow ptarmigan are an important subsistence resource for many hunters in the Western Rural region, which includes Unit 23 (Merizon and Carroll 2023). Harvest data for ptarmigan in Unit 23 is extremely sparse.

No hunter-harvested rock ptarmigan wings were collected in regulatory year (RY)20 and only 3 were collected in RY21 for the entire Western Rural region. Based on previous hunter surveys, ADF&G staff observations, and communication with Western Rural region hunters, the vast majority of ptarmigan harvested in this region are willow ptarmigan. Although rock ptarmigan are present, and often at high densities in localized areas, their habitat often remains far less accessible than willow ptarmigan habitat (Merizon and Carroll 2023).

From RY14 to RY21, all hunter-harvested willow ptarmigan wing samples collected from the Western Rural were from Unit 22C. In RY12 and RY13, 221 and 168 willow ptarmigan wing samples were collected, respectively, from Units 18, 22, 23, and 26A (Merizon and Carroll 2023).

ADF&G Division of Subsistence has periodically conducted surveys of household subsistence use of species over a single study year. **Table 1** shows estimated ptarmigan harvest and use during the most recent study year for each Unit 23 community. The estimated number of ptarmigan harvested by each community as a whole ranged from 1424 in Selawik to 53 in Kiana (ADF&G 2025c, **Table 1**).

Fluctuating ptarmigan populations and local abundance are reflecting in fluctuating ptarmigan harvests by communities from year to year (Magdanz et al. 2011). An average of 23% of surveyed households harvested ptarmigan across the region, and an average of 34% of households used ptarmigan (ADF&G 2025c, **Table 1**).

**Table 1.** Five measures of ptarmigan use by residents of Unit 23, as estimated by subsistence surveys conducted between 2007 and 2018 (ADF&G 2025c).

Community	Survey Year	% HH Using	% HH Attempting to Harvest	% HH Harvesting	Estimated Total Number Harvested	Estimated Number of Ptarmigan Harvested per Person
Ambler	2012	55%	40%	38%	433	1.5
Buckland	2018	44%	42%	37%	370	0.6
Deering	2013	19%	19%	16%	158	1.2
Kiana	2021	21%	10%	7%	53	0.1
Kivalina	2007	29%	17%	17%	233	0.5
Kobuk	2012	60%	47%	47%	120	0.7
Kotzebue	2014	17%	14%	12%	949	0.3
Noatak	2007	30%	22%	16%	205	0.4
Noorvik	2012	33%	27%	25%	435	0.7
Selawik	2011	36%	30%	27%	1424	1.7
Shungnak	2012	35%	20%	17%	141	0.5
<b>Average</b>		<b>34%</b>	<b>26%</b>	<b>23%</b>	<b>411</b>	<b>0.6</b>

### Alternatives Considered

One alternative considered was to increase the ptarmigan harvest limit but not the season in Unit 23. Willow ptarmigans are univoltine, meaning they have a single clutch per year. Extending the hunting season into June has the potential to disrupt brooding and chick rearing, negatively affecting recruitment and ultimately, ptarmigan abundance (Fronstin 2025, pers. comm.). This alternative would result in Federal regulations remaining more restrictive than State regulations, but may prevent mortality of young chicks or entire ptarmigan families. However, users have been able to harvest ptarmigan on most Federal public lands in Unit 23 until June 15 under the more liberal State

regulations since 2000 with no resulting conservation concerns. Therefore, this conservative approach does not seem necessary and was not further considered.

### **Discussion and Effects**

If this proposal is adopted, the Unit 23 ptarmigan season will be extended and the harvest limit increased, increasing opportunity for federally qualified subsistence users under Federal regulations. No impacts to the ptarmigan populations or user groups are expected because federally qualified subsistence users have been able to harvest under the more liberal State regulations on most Federal lands in Unit 23 since 2000. However, CAKR and KOVA are only open to the resident zone communities of CAKR and KOVA hunting under the more restrictive Federal subsistence regulations for ptarmigan. If this proposal is adopted, these residents would be able to harvest under the more liberal harvest limits and seasons in CAKR and KOVA.

Additionally, adopting this proposal would decrease regulatory complexity and confusion by aligning State and Federal regulations as directed by Executive Order 14153 3(b)(xxii) to “ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands.” Currently Federal regulations are more restrictive than State regulations.

### **OSM CONCLUSION**

**Support Proposal WP26-68**

#### **Justification**

This proposal increases subsistence opportunity under Federal regulations. There are no conservation concerns as federally qualified subsistence users are already able to hunt ptarmigan on most Federal public lands in Unit 23 under the more liberal State regulations. State regulations have been liberalized since 2000 with no resulting or apparent conservation concerns. Additionally, Federal and State regulations for ptarmigan in Unit 23 would be aligned, reducing regulatory complexity.

### **LITERATURE CITED**

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## **SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS**

### **Northwest Arctic Subsistence Regional Advisory Council**

The Council **supported** WP26-68. The Council supports the increased subsistence opportunity as well as aligning State and Federal regulations, both of which are of benefit to subsistence users.

### **North Slope Subsistence Regional Advisory Council**

The Council **supported** WP26-68. The Council shared their desire to assist their neighboring region with harvesting more subsistence foods as they're facing food insecurity due to the declining Western Arctic Caribou Herd (WACH) population.

## **INTERAGENCY STAFF COMMITTEE**

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 DEPARTMENT OF FISH AND GAME COMMENTS**

**Support.** No written comment received.