



## Customary and Traditional Use Analysis WP26-77

### ISSUE

Proposal WP26-77, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests recognition of the customary and traditional use of wood bison in Units 12, 20, and 25 by the residents of Units 12, 20 and 25.

### Proponent Statement

The proponent states that wood bison were traditionally hunted for subsistence by Alaska Native people for thousands of years. Their use was interrupted only because they ceased to exist in Alaska, not because of a change in patterns of use. Evidence of their traditional use in northeast Alaska exists in oral histories.

The proponent continues that wood bison are currently being reintroduced to the Eastern Interior region and are listed as an experimental population under the Endangered Species Act (ESA). Although no hunting can be allowed until they are delisted, the Council believes their customary and traditional use nevertheless should be recognized. The reintroduction of wood bison provides a chance for cultural practices and use of wood bison to be revitalized in the future.

### Current Federal Regulations

*None*

### Proposed Federal Regulations

#### Customary and Traditional Use Determination—Wood bison

<i>Unit 12</i>	<i>Residents of Units 12, 20, 25</i>
<i>Unit 20</i>	<i>Residents of Units 12, 20, 25</i>
<i>Unit 25</i>	<i>Residents of Units 12, 20, 25</i>

### Extent of Federal Public Lands

Unit 12 is comprised of approximately 60% Federal public lands that consists of 36% National Preserve, 12% National Park, 11% U.S. Fish and Wildlife Service (USFWS) and 1% Bureau of Land Management (BLM) managed lands.

Unit 20 is comprised of approximately 21% Federal public lands that consist of 9% National Park, 6% National Preserve, 6% BLM land and less than 1% of USFWS managed lands.

Unit 25 is comprised of approximately 73% Federal public lands that consist of 57% USFWS, 14% BLM and 2% National Preserve managed lands.

## Background

Wood bison, *Bison bison athabasca*, once inhabited interior Alaska and Northwest Canada. Oral histories from northeast Alaska indicate that they were part of some Alaska Native subsistence harvests until they ceased to exist in Alaska approximately one century ago (Seaton and Rogers 2025: 1; Stephenson et al.: 2001).

There have been three species of bison present in Alaska at different times.

- 1.) Wood bison, *Bison bison athabasca* are the focus of this analysis are Wood bison, Holocene era, that once lived in Alaska, ceased to exist and have been reintroduced to Alaska (Seaton and Rogers 2025, Stephenson et al.: 2001).
- 2.) Steppe bison, *Bison priscus*, now extinct, which were Pleistocene megafauna that lived in Alaska (Smith et al. 2014).
- 3.) Plains bison, *Bison bison bison* imported to Alaska from the continental United States. These are located at Delta Junction, Copper River, Chitina River, and Farewell (ADF&G 2025a).

The State of Alaska has primary management authority for the reintroduction of wood bison to Alaska in cooperation with Ecological Services at the USFWS. Together, the agencies designed a unique approach to the ESA to bring wood bison back to Alaska. When the idea of reintroduction was first broached, some stakeholders opposed it because the restrictions on Endangered Species (ES) reintroduction can stop other activities such as development and future harvest (Seaton and Rogers 2025: 3, Mahara 2025: 1). The agencies crafted an ES designation specifically for wood bison reintroduction. This designation is guided by the 2014 10(j) rule set forth by the USFWS and the Alaska Department of Fish and Game (ADF&G) (Seaton and Rogers 2025: 1-2). This allows for the reintroduced wood bison to be designated as a Nonessential Experimental Population (NEP). According to a regulatory overview on wood bison provided by the USFWS to the Eastern Interior Council at its February 2025 meeting,

In order to relieve landowner concerns and regulatory burdens associated with reintroducing wood bison in Alaska, in 2014, the U.S. Fish and Wildlife Service created a special rule for wood bison under sections 10(j) and 4(d) of the Endangered Species Act (ESA). The 10(j) rules allowed us to supersede the generic prohibitions against take under the ESA, replacing them with specific rules for wood bison (USFWS 2025: 1).

This designation is unique because unlike other ESA designations, "...the continued existence of the species does not depend on the experimental [Alaska] populations" (Mahara 2025). These special rules for wood bison and their designation as a NEP made the introduction of the species much less restrictive than typical restorations of endangered species. If this population grows, these specific rules may allow for a legal harvest of wood bison based on sustained yield principles (Mahara 2025). There are two situations under which NEP status can be lifted. The first is if wood bison recover and are delisted under the ESA and the second is if reintroduction programs end and the USFWS and the State of Alaska move to end the NEP designation (Mahara 2025). There is no guarantee of a State or Federal wood bison hunt.

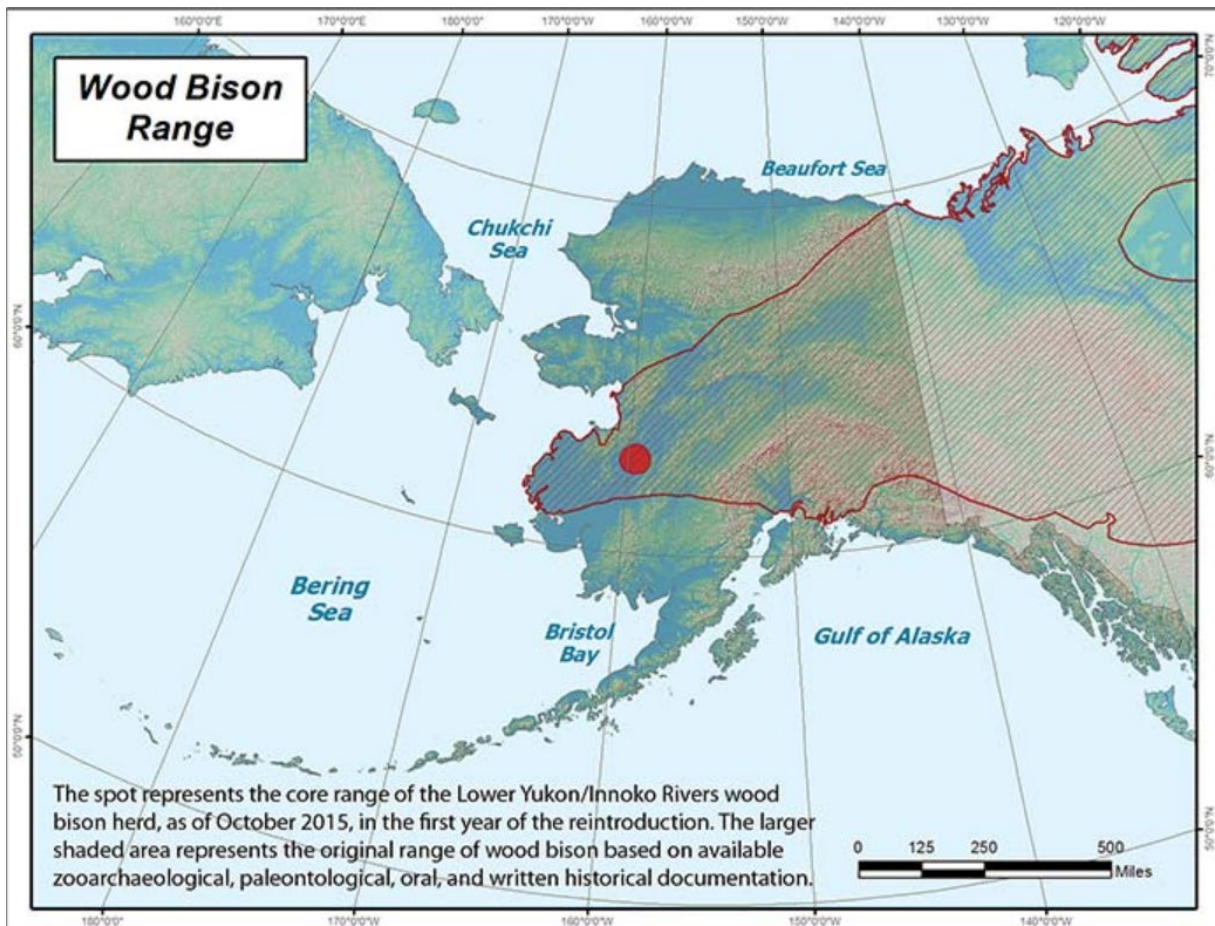
The Council, the proponent of this proposal, is not concerned with harvest and harvest regulations. The Council's proposal is about having their customary and traditional use acknowledged now, for the future. This is important to many rural Alaskans, who are unable to harvest species for a variety of reasons, because they see documentation of their uses in State and Federal fish and wildlife regulatory systems as critical to resuming access to these species, if and when it becomes possible.

As of now, in June 2025, there are no State or Federal hunts for wood bison in the Eastern Interior region. The Council's request for recognition of customary and traditional subsistence uses of wood bison in the Eastern Interior Region was made with full acknowledgment and awareness that there will be no harvest of this species under Federal subsistence regulations until wood bison are delisted from the ESA and if they someday inhabit Federal lands in sufficient numbers (EIRAC 2025: 100-102).

Stephenson et al. 2001 write that wood bison once inhabited Interior Alaska, were a subsistence resource for residents of that part of the state and the last reported sightings in Alaska occurred at the end of the 19<sup>th</sup> century. They were first listed as Endangered Foreign Fish and Wildlife under the 1969 Endangered Species Conservation Act. Because they were on this list, they were included as an endangered species under the 1973 ESA. In 2012, wood bison were reclassified as threatened due to the conservation efforts of Canada's National Wood bison Recovery team (Seaton and Rogers 2025; Mahara 2025). All the wood bison reintroduced to Alaska are from Canada where a remnant population survived after their disappearance from Alaska. For this reason, the recovery of these two populations is linked. Currently there are approximately 8,500 free-range wood bison in Canada. In Alaska, there are two reintroduced populations. As of 2023, there are approximately 72 bison in the Lower Innoko/Yukon area and in May 2025, 61 wood bison were released at Minto Flats (ADF&G 2025b). Planning is in progress for a potential release in the Yukon Flats (Seaton and Rogers 2025: 5). The reintroduction of wood bison to Alaska is guided by a required recovery plan that considers the health and recovery of the populations of wood bison in Alaska and Canada jointly; wood bison are listed range-wide (both Canada and Alaska) which means that the recovery of the herds is interdependent (Mahara 2025). For this reason, the USFWS plans to adopt Canada's 2018 Recovery Strategy which will also address the requirements of the ESA (Mahara 2025).

The State of Alaska, Division of Wildlife Conservation is leading an extensive public planning process regarding the (re)introduction of wood bison in three regions of the interior: the Upper and Lower

Tanana and the Yukon Flats (Bath: 2023a, 2023b and 2022). In general, public reaction to the reintroduction is mixed. While some rural community members, state hunting groups and conservationists strongly support reintroduction, Tanana Chiefs Conference (TCC), Doyon and some community leaders from each Unit and even some Council members do not support the reintroduction of wood bison (ADF&G 2005a, TCC 2024:16, EIRAC 2025).



**Map 1.** Estimated original range of wood bison based on available zooarchaeological, paleontological, oral, and written historical documentation (ADF&G 2025 based on data from Stephenson et al. 2001).

### Regulatory History

There is no Federal regulatory history for the subsistence harvest and/or use of Wood bison in Alaska.

### Current Events

At their December 16-18 meeting, the Council decided to defer this proposal because they learned that some residents of Units 12 and 20E are opposed to or have concerns about the re/introduction of wood bison. Prior to this Council meeting, the Wrangell St. Elias Subsistence Resource Commission (WRST SRC) discussed WP26-77 during their regular meeting in Tok during September 25-26, 2025. As noted by NPS at the December 2025 Council meeting, the SRC voted against supporting WP26-77

“...because they are concerned that recognizing a C&T would then lead to the reintroduction of wood bison...” and “it is also imperative that the Office of Subsistence Management conducts formal tribal consultation and public outreach to inform tribes and the public about these proposals” (EIRAC 2025b:104; WRST SRC 2025).

These and other specific reasons for opposition to WP26-77 stated at the WRST SRC meeting include:

- Recognizing customary and traditional use of wood bison sends a message of welcome that we don't want to send. (also EIRAC 2025a: 104)
- There has been no Tribal Consultation about reintroduction. (also EIRAC 2025a: 104)
- Management efforts in Upper Tanana should be focused on moose as they are in decline, they are our primary resource and because they are customary and traditional. There is very little salmon and caribou in this area.
- The introduction of species often causes problems.
- First Nations people from Canada said that introduced wood bison pushed moose away from traditional hunting areas and it is now extremely difficult to harvest moose.
- Wood bison are not customary and traditional in Unit 12 or Unit 20. There are no stories, no words, no place names.
- The people of the Upper Tanana have spoken at previous meetings and clearly stated that they do not want wood bison in their area (see Bath 2022, 2023a, 2023b).
- We need to see comments from the current residents of all affected: Units, 12, 20 and 25.
- Ahtna Intertribal Resource Commission withdrew their letter of support for WP26-77 in response to the local opposition they heard at the WRST SRC meeting (also EIRAC 2025b: 106, 112, 117).

In March 2025, the Alaska Board of Game adopted Proposal 88 to add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by the Department of Fish and Game.

## **Community Characteristics**

### Unit 12

The rural communities in Unit 12 include Chisana, Nabesna, Northway, Tanacross, Tetlin, Tok, Slana and Mentasta Pass. All these communities are on the Alaska Highway System.

The subsistence practices of these communities are a blend of Ahtna, Upper Tanana and Tanacross Athabascan traditions and those of Euroamerican settler/homesteaders. Subsistence harvests in these communities are dominated by large land mammals, fish, small land mammals, birds and plants (Godduhn and Kostick 2016:58-61, Holen et al. 2012, Marcotte 1991, Haynes et al. 1984).

### Unit 20

Unit 20 encompasses a wide swath of Alaska. The rural communities in Unit 20 include Anderson, Healy, Big Delta, Chicken, Clear, Delta Junction, Dot Lake, Ferry, Fort Greely, Healy Lake, Livengood, Lake Minchumina, Manley Hot Springs, Minto, Nenana, Rampart, Tanana, and Eagle. Three of these communities, Lake Minchumina, Rampart and Tanana are not on the Alaska Highway system and are accessible only by plane, boat, or snowmachine. The subsistence practices of these communities are diverse and are a blend of Han, Tanana, Gwich'in, Koyukon, and Ahtna Athabascan traditions and those of Euroamerican settler/homesteaders. Subsistence harvests in these communities are dominated by large land mammals, fish, small land mammals, birds and plants (Trainor et al. 2020, Brown et al. 2016, Brown et al. 2014, Holen et al. 2012, Holen et al. 2006).

### Unit 25

The rural communities in Unit 25 include Arctic Village, Venetie, Fort Yukon, Chalkyitsik, Canyon Village, Beaver, Birch Creek, Stevens Village, Central, Circle and Circle Hot Springs. Central, Circle and Circle Hot Springs are the only two Unit 25 communities on the Alaska Highway system. All the other communities are only accessible by plane, boat or snowmachine. The subsistence practices of these communities are diverse and are a blend of Gwich'in and Koyukon Athabascan traditions and those of Euroamerican settler/homesteaders. Subsistence harvests in these communities are dominated by large land mammals, fish, small land mammals, birds and plants (Trainor et al. 2020, Van Lanen et al. 2012, Sumida 1990, Sumida 1989, Sumida 1988, Sumida and Alexander 1985, Caulfield 1983).

### **Eight Factors for Determining Customary and Tradition Use**

A community or area's customary and traditional use is generally exemplified through these eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish

and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit some or all of the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process, and present recommendations for regulatory changes. In June 2016, the Board clarified that the eight-factor analysis applied when considering customary and traditional use determinations is intended to protect subsistence use, rather than limit it. The Board stated that the goal of the customary and traditional use determination analysis process is to recognize customary and traditional uses in the most inclusive manner possible.

It is important to note here that one of the eight factors for determining customary and traditional use specifically applies to wood bison in Alaska, and that is, 1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area. Wood bison have been absent from Alaska for at least 200 years, if not longer. Stephenson et al. 2001 present compelling oral histories regarding wood bison from Units 20 and 20E.

With or without oral histories, the absence of specific memories or records of past use of a species does not erase the possibility of customary and traditional uses of introduced and reintroduced species. Basic to the rural Alaskan subsistence lifestyle is that people must harvest what shows itself to them; they use what is there.

As noted by the Office of Subsistence Management (OSM),

There are many examples of species such as reindeer being introduced, reintroduced, or moving into new areas, and subsequently being adopted into the local subsistence round, so long as opportunity is provided. Moose began moving into the Seward Peninsula in the 1940s following major fires in the region, and harvest of this species grew as their population increased (Thomas 1982; SPRAC 2019a, 2019b; Braem et al. 2017; Tape et al. 2016). In another example, residents of Kaktovik began to hunt muskoxen after their reintroduction and were subsequently recognized by both the State and the Federal subsistence program as having customary and traditional use of the species. Muskoxen were first reintroduced to the Seward Peninsula in 1970 (Machida 1997), and over time, residents of Unit 22 have incorporated them into their seasonal round (OSM 2025: 6-7).

OSM noted similar practices on Kodiak Island,

The traditional subsistence economies of the Alutiiq/Sugpiaq were based on the harvest of marine and freshwater resources such as marine mammals, non-salmon fish, shellfish, sea or littoral birds and their eggs, and salmon (Sill et al. 2021, Clark 1998). The current subsistence practices of the rural residents of Kodiak and Afognak Islands still reflect the cultural traditions of the Alutiiq/Sugpiaq, as well as those of Eastern European, Asian, and American settlers. Commercial fishing and processing have also been an important industry in the area since the 1800s (Sill et al. 2021). Large land mammals have traditionally been secondary components of local subsistence economies on Kodiak and Afognak Islands, as only the Kodiak brown bear (*Ursus arctos middendorffi*) is native to this area (USFWS 2023). Deer, elk, and mountain goats were all introduced to the area in the early-to- mid-1900s (Sill et al. 2021). Deer in particular have been increasingly integrated into the seasonal round of subsistence harvest activities by Kodiak Island communities since their introduction in 1924 (Sill et al. 2021). Deer are now the most dominant and important large land mammal species utilized by Kodiak Island residents in their subsistence efforts (Svoboda and Crye 2020, Sill et al. 2021). Recent comprehensive subsistence harvest surveys conducted in Kodiak Island communities by ADF&G have consistently shown the importance of deer in terms of household utilization and overall bulk contribution to subsistence diets (OSM 2024).

In 2024, the anthropologist at Wrangell St. Elias National Park and Preserve interviewed two elders from the Upper Tanana region, one from Northway and one from Nabesna. Both had heard stories from elders about “an animal that some referred to as water buffalo in the Nabesna area” but neither included accounts of hunting or other uses of the animals (Cellarius 2025). These elders and others sometimes refer to wood bison as “buffalo”.

Comments on this draft received from the Alaska Department of Fish and Game, Division of Subsistence indicate that during more than 40 years of subsistence research in rural Alaska and more than 800 interviews conducted in Interior Alaska, no one has mentioned wood bison. A 2025 search of the Division of Subsistence Community Subsistence Resource Information System and a word search for bison and buffalo also yielded no results.

Currently, there appears to be only one source with information with oral histories about Alaskan wood bison. It is an interdisciplinary paper co-authored by Alaskans who were/are leaders in their fields, archaeologists, biologists, paleontologists. The first author of this paper is the late Robert O. Stephenson, a wildlife biologist with ADF&G. His obituary describes him as “...one of the first to integrate traditional knowledge with modern wildlife science” (Brainerd et al 2016: 13).

The “recent” use of wood bison as part of historic Athabascan subsistence harvests in Alaska was not well known by researchers until recently. In 1991, a resident of Fort Yukon told Robert O. Stephenson, ADF&G biologist and lead author of Stephenson et al. 2001, the stories his mother told him of the time when wood bison lived near Fort Yukon (Stephenson et al. 2001: 127). After this conversation, the

team of interdisciplinary researchers began to search for more people who might have knowledge of wood bison use. Initially, nine Alaskan Athabascan elders, residents of communities in Units 20 and 25 were interviewed. In Unit 20, the interviewees were residents of the communities of Tanana, Nenana and Minto and interviewees in Unit 25 were residents of Fort Yukon, Venetie, Chalkyistik, Birch Creek and Beaver (Stephenson et al. 2001: 127). The general results of this study, independently reviewed by non-participant researchers, follow:

Athabascan elders residing in the upper Yukon and Tanana River drainages in interior Alaska provided oral accounts referring to late Holocene [last 11,700 years] [wood] bison. Consistent oral narratives provided by multiple elders indicate bison were present and hunted in parts of interior Alaska within the last few hundred years. There are a number of persistent themes in the oral narratives that provide insight into the late Holocene distribution, human use, and disappearance of wood bison in Alaska (Stephenson et al. 2001: 127).

Thirteen Athabascan elders, both men and women, provided accounts of wood bison as an aspect of the historic subsistence harvests of their ancestors (Stephenson et al. 2001: 147). The accounts describe the subsistence harvest and use of wood bison in the upper Yukon drainage, the Tanana drainage and more specifically, “the flats along the Yukon River from the vicinity of Beaver east to the lower Chandalar, Porcupine and Black River drainages in the vicinity of Fort Yukon, the Hodzana River drainage northwest of Beaver, the Grayling Fork area in the upper reaches of the Black River and the flats adjacent to the Tanana River” (Stephenson et al. 2001: 128).

These oral history accounts demonstrate Traditional/Indigenous knowledges of wood bison a generation after wood bison ceased to exist Alaska. They indicate that wood bison were used for food, clothing, bedding, floor coverings; their hair was used for sewing and stitching cuts. Hunters harvested them with bows/arrows and spears and used snowshoes and dogs to pursue them. In some locations, drives were used to harvest large numbers of bison (Stephenson et al. 2001: 128-131,139). A couple of elders referred to the era of wood bison harvest as, “the skin clothes days” (Stephenson et al. 2001: 128,131).

The interdisciplinary study by Stephenson et al. in 2001 included Traditional/Indigenous Knowledge bearers, archeologists, paleontologists, biologists, and linguists. An important facet of the knowledge of wood bison includes the linguistic categories and other means of specifying between wood bison and muskoxen. The Reverend David Salmon of Chalkyitsik provided a detailed account summarized by researchers:

Gwich'in names for bison include *Dachantee aak'ii* which he translated as ‘cow in the forest’, and *Ch'atthaii dgahan choo*, which he translated as ‘large animal with a hump’. He indicates these terms could be applied to either muskoxen or bison, emphasizing that only bison occurred on the Yukon Flats. Rev. Salmon explained that these two animals were distinguished in conversation because of the distinctive shape of their horns and clarified any ambiguity regarding the name *Dachantee aak'ii*. He describes the characteristic downswept horns which ‘cover the head’ of a muskox,

contrasting them with the upwardly curving horns of bison. When referring to muskoxen the speaker would typically place an open palmed right hand above the ear, move it gently downward over the ear then then out and up in an arc, indicating the downswept curve and upturned end of the horn. When referring to a wood bison, a hunter would extend and slightly curve the first and second fingers, placing them against the upper temple, indicating the outward and upward curve of wood bison horns. The phrase '*Dachantee aak'ii viji viji noiinjik*' means 'cow in the forest with the horn that sweeps downward to protect the head.' In contrast, the phrase '*Dachantee aak'ii viji neekwaii gwanlii*' means 'cow in the forest with two short horns turning upward'. Rev. Salmon stated that even during the early 1900's, hunters discussing bison or muskoxen would qualify the term with the hand sign, adding that Gwich'in people in a large region extending from Fort McPherson [Canada] to Fort Yukon commonly used the term *Dachantee aak'ii* accompanied by the hand sign to denote wood bison (Stephenson et al. 2001: 129)

The stories Rev. Salmon told were stories he had heard from multiple elderly relatives who said Yukon Flats people depended on wood bison, likely before moose populated the area. He reported that mosquitoes did not irritate bison because of their long hair. He said they were a 'good animal' because they were an important source of food and other materials. He frequently repeated that the Yukon Flats "is their country...they belong to it" (Stephenson et al. 2001: 129). Rev. Salmon and several of his relatives have found bison bones in riverbeds in the Yukon Flats.

In addition to the linguistic data Rev. Salmon shared, other elders provided slightly different Gwich'in names and translations for bison: *Dachantee aak'ii* was translated as 'muskox among timber' and *Dachantee qwaak'ii*, 'the hefty one among timber' (Stephenson et al. 2001: 128). Other terms include, *Ch'itthay dighan* for big, humped animal or "humped meat," *Nan'aak'ii choo*, "large animal" or "big hefty one on the land" (Stephenson et al. 2001: 128).

Julia Tritt of Venetie provided another name for bison and provided details of wood bison harvest and use on the Yukon Flats:

The late Julia Tritt of Venetie recounted stories told by her grandfather and other elders about how 'buffalo' were hunted on the Yukon Flats. She referred to bison as the 'big animal' stating that elders often remarked on the animal's 'big head,' long tail and large size. She said hunters often found their large, round tracks in the snow. They were said to be fairly easy to hunt and kill with bow and arrow or spears, and dogs were also used to help bring them down. Bison were sometimes caught in, and often ruined, snares set for moose or caribou. These snares were often not strong enough to hold them. She said bison were 'good eating' and provided high quality food for people. Sewing thread was made by plaiting together several of the longest hairs, and a single bison hair was used to suture cuts on people. Mrs. Tritt said bison hides were hard to tan compared to those of other animals and were sometimes only partially

tanned and used to cover the floor in a dwelling. She said that bison eventually disappeared or left the country. Mrs. Tritt indicated these accounts pertained to the early 1800's and earlier (Stephenson et al.: 131).

Unlike Mrs. Tritt, other elders preferred bison hides to those of other animals:

Mrs. Virginia Titus provided stories regarding the presence of bison in interior Alaska that were conveyed to her by her father and grandfather...Her father travelled extensively between Tanana and Fort Yukon. Her father heard many stories about bison and their value to people in the 'skin clothes days' when animal skins were the only materials available for clothing. She was told that bison were once common and widespread in Alaska, although they were found mostly at low elevation and were scarce in the mountains. The flats in the Tanana and Yukon drainages were said to support bison in the early days. According to Mrs. Titus, bison were second only to moose as a source of food and were an important source of material for clothing and shelter as well. Bison had a 'big head', and the hides were tanned with the hair on to make warm robes and clothing. The hair was soft, and bison hides were preferred for clothing because they did not cause allergic reactions in people. Mrs. Titus said these stories described the presence of bison in the 1700s and into the early 1800s as well as earlier. Her grandfather said bison were hunted with bow and arrow, with spears, with the aid of snowshoes in winter, and with the aid of dogs. She adds that there was more snow in the early days, noting this may have increased the vulnerability of bison to hunters. She indicated that the disappearance of bison in this region was due to hunting stating, 'they were easy to kill, that's why they are not here'. Mrs Titus recalled the name for bison as '*nan'aak'ii choo*' which she translated as 'big animal'.

Another elder, Moses Cruikshank of Beaver provided an account of wood bison:

Mr. Moses Cruikshank of Beaver said there were many Gwich'in stories describing how bison inhabited the Yukon Flats in the old days when, 'big herds' of these animals occurred in the area. Large numbers of bison were sometimes killed in the fall when much of the meat was dried and 'used all winter long'. A story attributed to Chief Christian [from Arctic Village] relates to 'a mountain up in the Sheenjek River country' called 'Buffalo Shirt Mountain'. Mr. Cruikshank said a 'large herd of bison came through and covered the mountain like a shirt' at this location. Bison were hunted there for several years and were guided by fences down on the flats and driven over a cliff. Mr. Cruikshank said many bison were killed during this period. He noted that the taking of large numbers of bison by people at 'Buffalo Mountain' occurred sometime before Chief Christian was born and before firearms were generally available. Rev. Salmon indicates that Chief Christian was born about 1855 and was 93 years old when he died... Mr. Cruikshank further states that a strong bow was required

to kill bison and that bison hunting was sometimes dangerous (Stephenson et al. 2001: 130).

It is noteworthy that the residents of Venetie described this same placename to a United States Geological Survey engineer in 1956. The engineer was there specifically to document placenames and was told that the English name of a nearby mountain was “Buffalo Shirt”. The residents explained that buffalo had been hunted there by being “driven over an escarpment”. The engineer reported that the people made it extremely clear that they had never seen buffalo but they were highly aware of the difference between buffalo/bison and muskoxen (Stephenson et al. 2001: 139).

This place name demonstrates the power of customary and traditional uses, no longer practiced, written on the land and remembered through oral histories. Its mention by the people interviewed in the 1990’s shows that the body of Traditional/Indigenous knowledges of wood bison, of life, is discussed and shared across miles, communities and time. This tells us that it was important to keep, not for researchers, but for the identity of those who hold and share the customary and traditional knowledge of this species that sustained their ancestors.

It is important to note here that not all rural Alaskans are in favor of the reintroduction of wood bison. ADF&G Division of Wildlife Conservation has conducted extensive outreach with residents of the Upper and Lower Tanana and Yukon Flats regions. Three workshops were held in 2023 in Tok and Fairbanks. Some participants supported the reintroduction of wood bison in their area. Others were concerned about the effects of wood bison on other species such as muskrats, berries, mushrooms and other plants. A representative from Northway stated opposition and for some, harvest allocation was an issue of concern. Others expressed concerns about an influx of outside people arriving to harvest wood bison and some mentioned co-management (Bath 2023a, Bath 2023b, Bath 2022). Tribal co-management of wood bison was discussed by the Council in the 1990’s (EIRAC 1995: 133, EIRAC 1997: 124-130, EIRAC 1998a: 25, EIRAC 1998b: 258-259, 272-289).

In 2024, Tanana Chiefs Conference passed Resolution 2024-27 that articulated issues like those voiced in the workshops. These include concern from Doyon that “ADF&G exaggerated potential benefits to locally affected communities and failed to address allocation, impact to resource development, and trespass issues”. The resolution states that “The Innoko herd was reintroduced over 10 years ago, yet the promises made by ADF&G regarding the benefits to tribes have not been realized and it has yet to be determined if wood bison herds can be successfully established”. Regarding oral histories, the resolution is clear that “Wood bison are not part of the oral history or stories of the Nenana Tribe, whose local elders tell stories of their grandparents’ way of life that do not include wood bison...”. The entire 3-page resolution is attached as **Appendix 1**.

## **Discussion and Effects**

If this proposal is adopted, the customary and traditional use of wood bison in Units 12, 20, and 25 will be recognized for residents of Units 12, 20 and 25. The proponent, the Council, has no expectation of a wood bison hunt at this time.

## OSM PRELIMINARY CONCLUSION

### Support Proposal WP26-77

#### Justification

The oral histories in Stephenson et al. 2001 provide compelling data regarding traditional knowledges and the customary and traditional uses of wood bison. These oral histories chronicle the historic but interrupted customary and traditional use of wood bison by the residents of Units 20 and 25. Although very little information regarding customary and traditional use of wood bison in Unit 12 has been identified, wood bison occurred historically in present-day Unit 12, and, as demonstrated with other resources across Alaska, customary and traditional uses of other introduced and reintroduced species have been recognized because rural Alaskans harvest what is available to them.

#### LITERATURE CITED

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## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

### Eastern Interior Alaska Subsistence Regional Advisory Council

The Council voted to **defer** WP26-77 **until further consultation with Tribes and communities in the region has been conducted.**

The Council wants to wait to make a recommendation to the Board so they can gather additional input from affected users. The Council submitted this proposal and continues to support recognition of customary and traditional use (C&T) of wood bison in the region. However, after hearing public testimony during their meeting, they would like the opportunity to refine the original proposal by incorporating additional feedback from Tribes and communities. The Council noted that more outreach is needed regarding the intent of the proposal, citing confusion on behalf of some Tribes and the public on whether recognition of C&T indicates support for reintroduction efforts, especially in Unit 12. The Council noted that the reintroduction of wood bison is an on-going divisive issue in the region but that reintroduction efforts being led by the State are distinctly separate and not impacted by a Federal C&T finding. It is the hope of the Council that additional outreach and consultation will help clear up misunderstandings and ultimately result in greater consensus for this proposal among affected users.

### 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 DEPARTMENT OF FISH AND GAME COMMENT

**Oppose.** The Alaska Department of Fish & Game (ADF&G) **OPPOSES** this proposal. There are no provisions within Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) that gives the Federal Subsistence Board (FSB) regulatory authority over species listed under the Endangered Species Act (ESA). Until such a time as wood bison are delisted in Alaska the FSB cannot promulgate regulations governing the harvest of wood bison.

#### **Background**

Wood bison are a subspecies of bison with an original range that included Interior Alaska and Northwest Canada. According to Alaska Native oral history from the area that includes Tanana Village to Fort Yukon, wood bison herds disappeared from Interior Alaska in the past few hundred years; the last individuals were seen and killed around 1918. While it is unknown exactly why wood bison disappeared from Alaska, the most plausible theories suggest that climate-induced habitat change and hunting by humans were the primary causes. Their absence has left an open niche for a large, lowland grazer in the ecosystem of present-day Interior Alaska.

In 1993, ADF&G shared with the public what was known about wood bison and asked for comment, through a feasibility study, whether the state should pursue restoration of wood bison in Alaska. The

comments were overwhelmingly supportive of the effort, which set the course for the State to restore wood bison in portions of its former range in Alaska.

There are currently 5 wild, free-ranging bison populations in Alaska, maintained for the public trust by ADF&G. Four of the 5 populations are the plains bison subspecies, which were established from a 1928 importation from the National Bison Range in Montana. There is currently only one free-ranging population of the wood bison subspecies in the United States, which is in Alaska and was sourced from a disease-free population at Elk Island National Park in Canada.

Plains and wood bison historically hybridized in central Alberta, Canada, with wood bison occupying the range to the north, in northern Canada and Alaska, and plains bison occupying the range to the south in the Great Plains, contiguous United States, and northern Mexico. Despite historical geographic differences, both subspecies of bison are generalist grazers and serve similar ecosystem functions. The 5 bison populations in Alaska demonstrate large variability in performance, from the highest that can be expected for an Alaska big game population of any species to the lowest. Having bison in Alaska for almost 100 years has shown that bison can do well in Alaska if they develop a pattern of use in suitable habitat and environmental conditions. Experimental wood bison populations that become established in suitable habitat and environmental conditions within their original range in Alaska have a high probability of long-term success.

Because wood bison are listed as a threatened species under ESA, their restoration is guided by 2 main documents, the 2013 EA and the federal Nonessential Experimental Population 10(j) Rule. The United States Fish and Wildlife Service (USFWS) listed wood bison as endangered throughout its range under the precursor to the ESA in 1969. The status was changed to threatened in 2012. ESA requires a range of protections for listed species and their habitats. Concerns about these protections and associated management requirements resulted in some opposition to restoring wood bison in Alaska, primarily related to potential restrictions on development. In response to these concerns, ADF&G worked with USFWS to develop a federal rule, published in 2014. This rule designated wood bison in Alaska as a nonessential experimental population, or NEP, under ESA section 10(j). The rule includes provisions under ESA section 4(d), which allow certain kinds of take, including hunting, to provide for the conservation of the species. The federal rule also gives ADF&G primary management responsibility for leading and implementing the restoration effort.

The final rule for the 10(j) NEP under ESA was published 7 May 2014 by USFWS and titled “Endangered and Threatened Wildlife and Plants: Establishment of a Nonessential Experimental Population of Wood Bison in Alaska” (Federal Register 2014). The full text of the final rule can be viewed at <http://www.fws.gov/policy/library/2014/2014-10506.pdf>.

The federal rule includes the following provisions:

- Regulated hunting under sustained yield principles is allowed.
- Activities such as resource development, hunting, trapping, and recreation are allowed within the range of wood bison.
- Designation of “critical habitat” under the ESA is not allowed (this provides additional assurance that other land uses will not be affected by the presence of wood bison).
- If a reintroduction effort fails, or in the unlikely event that litigation changes their legal status, the animals may be removed from the landscape.
- ADF&G will be the lead agency in reintroductions and, using scientific knowledge and experience, will have primary responsibility for bison management.
- Management of wood bison in the NEP area will be guided by provisions in:
  1. The federal final rule: <http://www.fws.gov/policy/library/2014/2014-10506.pdf> .

2. The associated final environmental assessment: [http://www.adfg.alaska.gov/static/species/speciesinfo/woodbison/pdfs/environmental\\_assessment\\_designation\\_experimental\\_population\\_wood\\_bison\\_interior\\_alaska\\_2013.pdf](http://www.adfg.alaska.gov/static/species/speciesinfo/woodbison/pdfs/environmental_assessment_designation_experimental_population_wood_bison_interior_alaska_2013.pdf).
3. The ADF&G environmental review: [http://www.adfg.alaska.gov/static/species/speciesinfo/woodbison/pdfs/er\\_no\\_appendices.pdf](http://www.adfg.alaska.gov/static/species/speciesinfo/woodbison/pdfs/er_no_appendices.pdf).
4. Site-specific management plans for wood bison restoration developed through the use of a public planning process.

In 2025, the Alaska Board of Game (BOG) passed Proposal 88 which added wood bison to the list of game species that can be taken by permit and used within the state for the teaching and preservation of historic or traditional Alaskan cultural practices, knowledge, and values. There is currently no harvestable surplus for wood bison in either reintroduced herd. A primary goal of restoring wood bison in Alaska is to provide for the opportunity for harvest, but it will be many years before the wood bison populations grow enough that this permit would be able to be considered. A cultural and education permit differs from a permit for certain religious ceremonies. Under 5 AAC 92.019 the purpose of such a permit is, "...for use in this state as food in customary and traditional Alaska Native funerary or mortuary religious ceremonies 12 months preceding the ceremony is authorized if consistent with sustained yield principles." A permit for religious ceremonies also requires that a customary and traditional use determination has been approved by the BOG. At this time no such determination has been made.

#### **Impact on Federally Qualified Users**

If adopted, impact on FQUs would depend on subsequent actions taken by the FSB.

#### **Impact on Other Users**

If adopted, impact on other users would depend on subsequent actions taken by the FSB.

#### **Opportunity Provided by State**

**State customary and traditional use findings:** The Alaska Board of Game (BOG) has yet to make a customary and traditional use findings for wood bison in any of the GMUs in which they have been reintroduced.

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

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.

There is currently no ANS for wood bison in Alaska.

Under state regulation 5 AAC 92.034(10) wood bison are listed under species eligible for the issuance of a cultural and education permit for the taking, and use within this state, of game for the teaching and preservation of historic and traditional Alaskan cultural practices.

#### **Conservation Issues**

If adopted, there are no known conservation concerns.

**WRITTEN PUBLIC COMMENTS**

1. Ahtna Intertribal Resource Commission (withdrawn)

## APPENDIX 1

RESOLUTION 2024 - 27  
Tanana Chiefs Conference Full Board of Directors



## OPPOSING THE RELEASE OF WOOD BISON IN THE LOWER TANANA

- WHEREAS,** Tanana Chiefs Conference (TCC) is an Alaska Native tribal health and social services consortium established by the Interior Alaska tribes and tribal communities, to provide a unified voice in advancing sovereign tribal governments through the promotion of physical and mental wellness, education, socioeconomic development and culture of the Interior Alaska Native; and
- WHEREAS,** Alaska Fish and Game (ADF&G) designated the Lower Tanana River area as one of the approved locations for the release of bison in the 2013 Environmental Assessment and associated 10(j) rule for wood bison in Alaska; and
- WHEREAS,** In 2023, the ADF&G resumed the concept of restoring bison in the lower Tanana drainage, initiating a site-specific public planning process; and
- WHEREAS,** The Environmental Assessment that was developed in cooperation with the US Fish and Wildlife Service that ADF&G is using to guide restoring the bison is obsolete from over 10 years ago in 2013, had a narrow focus and is not integrated with environmental consequences or impacts; and
- WHEREAS,** The Environmental Assessment states that the State of Alaska will not consider reintroducing wood bison to Alaska in the absence of Federal regulatory assurance to land owners and land managers that such action will not adversely affect resource development activities, and ADF&G will develop site specific wood bison management plans in cooperation with other State and Federal agencies, land owners, local residents, wildlife conservation, and other stakeholders; and
- WHEREAS,** Doyon, Limited in January 2024 expressed concern regarding the ADF&G's wood bison project, stating that ADF&G exaggerated potential benefits to locally affected communities and failed to address allocation, impact to resource development, and trespass issues; and
- WHEREAS,** The Innoko herd was reintroduced over 10 years ago, yet the promises made by ADF&G regarding the benefits to Tribes have not been realized and it has yet to be determined if wood bison herds can be successfully established; and

**RESOLUTION 2024 - 27**  
**Tanana Chiefs Conference Full Board of Directors**



- WHEREAS,** The Tribes in the Tanana Chiefs Conference region are currently facing food security concerns due to the Yukon River salmon disaster and not being able to fish for the last four years. Tribes face difficulties with the high cost of living, and substituting salmon with other local animals due to the lack of moose or increased competition from outside hunters; and
- WHEREAS,** Trespass of outside hunters on our traditional lands, which the State fails to address. Adding additional animals to be hunted will make trespass harder to control, placing the burden on Tribes and corporations; and
- WHEREAS,** The release of wood bison into the Lower Tanana area would increase pressure from outside hunters, leading to trespass issues and reducing the ability for Tribes to harvest traditional foods on their lands; and
- WHEREAS,** Wood bison are not part of the oral history or stories of the Nenana Tribe, whose local elders tell stories of their grandparents' way of life that do not include wood bison; and
- WHEREAS,** The State of Alaska passed House Bill 123 that codifies in law the state recognition of federally recognized Tribes, and ADF&G did not conduct proper government-to-government consultation with Tribes regarding the release of wood bison into the Lower Tanana area in align with the ADF&G Tribal Consultation policy signed in 2002; and
- WHEREAS,** in 2002, ADF&G implemented a policy on "Government-to-Government Relations With the Federally Recognized Tribes of Alaska," that states the Department and Boards are committed to consulting with tribes in Alaska prior to taking action or undertaking activities that affect a Tribe or Tribes and shall favor meaningful participation of the affected Tribe; and
- WHEREAS,** It is a management failure to introduce additional animals into an ecosystem when ADF&G is failing to adequately manage the current animal populations on our traditional lands.

**RESOLUTION 2024 - 27**  
**Tanana Chiefs Conference Full Board of Directors**



**NOW THEREFORE BE IT RESOLVED** that the Tanana Chiefs Conference Full Board of Directors opposes the release of wood bison into the Lower Tanana area and calls upon ADF&G to cease any further actions on this effort until ADF&G has:

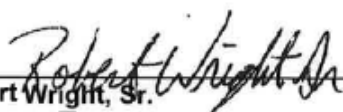
1. Conduct proper government-to-government consultation with Tribes in alignment with the Tribal Consultation Policy signed in 2002 regarding the determination of the release, allocation, and traditional and ceremonial use of the wood bison, and provides a report with how the Tribal consultation will be incorporated; and
2. Conduct an updated Environmental Assessment that evaluates the potential environmental and cultural effects in the three areas where wood bison are targeted for reintroduction and includes legacy data over the past decade on the Innoko wood bison herd and integrate that data into the development of alternatives, and invite Tribes to be cooperative agencies; and
3. Completes thorough assessments of potential and long term impacts of wood bison on the ecosystem, and that data is shared with Tribes; and
4. It has been proved through the Innoko herd that wood bison herds can be successfully reestablished and there are successful hunts that benefit the food security of local Tribes; and



**BE IT FINALLY RESOLVED** that the Tanana Chiefs Conference Full Board of Directors agrees that ADF&G should allocate more resources toward addressing the decline in the moose population over the past four years, and stands in unity with Doyon, Limited's position that a more efficient use of state resources would be to focus on existing fish and wildlife within the state rather than continuing ADF&G's project to import an animal that has historically failed.

**CERTIFICATION**

I hereby certify that this resolution was duly passed by the Tanana Chiefs Conference Full Board of Directors on March 13, 2024 at Fairbanks, Alaska and a quorum was duly established.

  
 Robert Wright, Sr.  
 Secretary/Treasurer

**Submitted by:** Nenana Native Association & Manley Traditional Council