
[EXTERNAL] WSA WP26-31

From AITRC Connect <connect@ahtnatribal.org>
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To Subsistence, OS <subsistence@ios.doi.gov>

■ 1 attachment (516 KB)
Signed WSA WP26-31.pdf;

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Dear Office of Subsistence Management,

On behalf of the Ahtna Intertribal Resource Commission, please find attached a signed Wildlife Special Action request asking the Federal Subsistence Board to implement Wildlife Proposal WP26-31 on an interim basis for the remainder of the 2026 Unit 13 moose season.

WP26-31 was adopted by the Board at its April 2026 meeting and would close unencumbered BLM lands in Unit 13 (13E and 13 remainder – 13A, 13B, 13C, 13D) to moose hunting by non-federally qualified users, limiting harvest on those lands to federally qualified subsistence users under Federal registration permit FM1301. Because the final rule implementing WP26-31 has not yet been published, BLM lands in Unit 13 remain open to all users under current regulations, and federally qualified subsistence users continue to face hunting pressure from non-federally qualified users during the height of the season.

AITRC requests interim implementation of WP26-31, effective immediately, so that the regulatory change the Board has already adopted is in effect through the Unit 13 season close on September 30, rather than taking effect only after the season ends.

The attached letter, signed by Donna Renard, Board of Directors Chair, provides full detail on current regulations, the proposed interim regulations, and the adverse effects of delay. Please let us know if any additional information is needed.

Thank you for your time and consideration.

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September 9, 2026

Anthony Christianson, Chair
Federal Subsistence Board
U.S. Fish and Wildlife Service
Office of Subsistence Management
1011E. Tudor Road, Mail Stop 121
Anchorage, Alaska 99503

Dear Chairman Christianson,

The Federal Subsistence Board adopted Wildlife Proposal WP26-31 at its April 2026 meeting, closing Bureau of Land Management (BLM) lands in Unit 13 to the hunting of moose by non-federally qualified users to ensure the continuation of subsistence uses for moose in that area. Due to delays in the Federal subsistence regulations being finalized and published, the Ahtna Intertribal Resource Commission is submitting this Wildlife Special Action as an interim measure to implement WP26-31 in Unit 13 for the remainder of the 2026 moose season.

Action request: Implement Wildlife Proposal WP26-31 as an interim closure of Bureau of Land Management lands in Unit 13 to moose hunting by non-federally qualified users, effective immediately for the remainder of the 2026 Unit 13 moose season.

Current regulations: Federal regulations currently allow the harvest of 1 antlered bull moose by Federal registration permit (FM1301) only in Unit 13E (one permit per household) and Unit 13 remainder, from August 1-September 20 and are open to all users; BLM lands are not currently closed to non-federally qualified users. The Board also adopted a companion proposal, WP26-28(b), at its April 2026 meeting extending the Unit 13 Federal moose season by 10 days to close September 30; that change is likewise pending publication of the final rule. State regulations provide a concurrent general season and a community harvest (any-bull permit) system in Unit 13 that draws substantial hunting pressure from resident and nonresident hunters from across the state.

Proposed regulations: Implement what the Federal Subsistence Board adopted in WP26-31: close all unencumbered BLM lands within Unit 13 - Unit 13E and Unit 13 remainder (13A, 13B, 13C, and 13D) to moose hunting except by federally qualified subsistence users hunting under Federal registration permit FM1301.

Unusual conditions: This request seeks interim implementation of a regulatory change the Board has already adopted; it is not based on a new or unanticipated change in resource abundance.

Adverse effects: Failure to adopt this Wildlife Special Action request would create uncertainty as to what regulations should be adhered to for the remainder of the season. The final rule could also take effect mid-season, creating confusion and enforcement difficulty for hunters already in the field and undermining the continuation of subsistence uses that WP26-31 was adopted to protect. Federally qualified subsistence users in Unit 13 continue to face intense competition from non-federally qualified users for the limited BLM lands available to them, and continued delay extends that competition through the heart of the season.

Request purpose: To ensure continuation of subsistence uses of moose in Unit 13, consistent with the Board's determination in adopting WP26-31.

Regulatory change timing: The goal is a seamless transition so that the WP26-31 regulatory change is in effect for the remainder of the 2026 Unit 13 moose season through its September 30 close, rather than taking effect only after the season has ended or disrupting hunters mid-season upon publication of the final rule.

Thank you for your time and consideration.

Respectfully,



Donna Renard
Board of Directors, Chair
Ahtna Intertribal Resource Commission