Draft Wildlife Temporary Special Action Analysis
WSA26-05

ISSUE

Temporary Wildlife Special Action Request WSA26-05, submitted by Jimmy Coopchiak, a resident of the Traditional Village of Togiak, requests to establish a March caribou hunt for the 2026-2028 regulatory cycle on Federal public lands in the Cape Pierce area of Units 17A and 18 (**Map 1**). The proponent requests that eligibility for this hunt be limited to residents of Togiak, Twin Hills, Goodnews Bay, and Platinum.

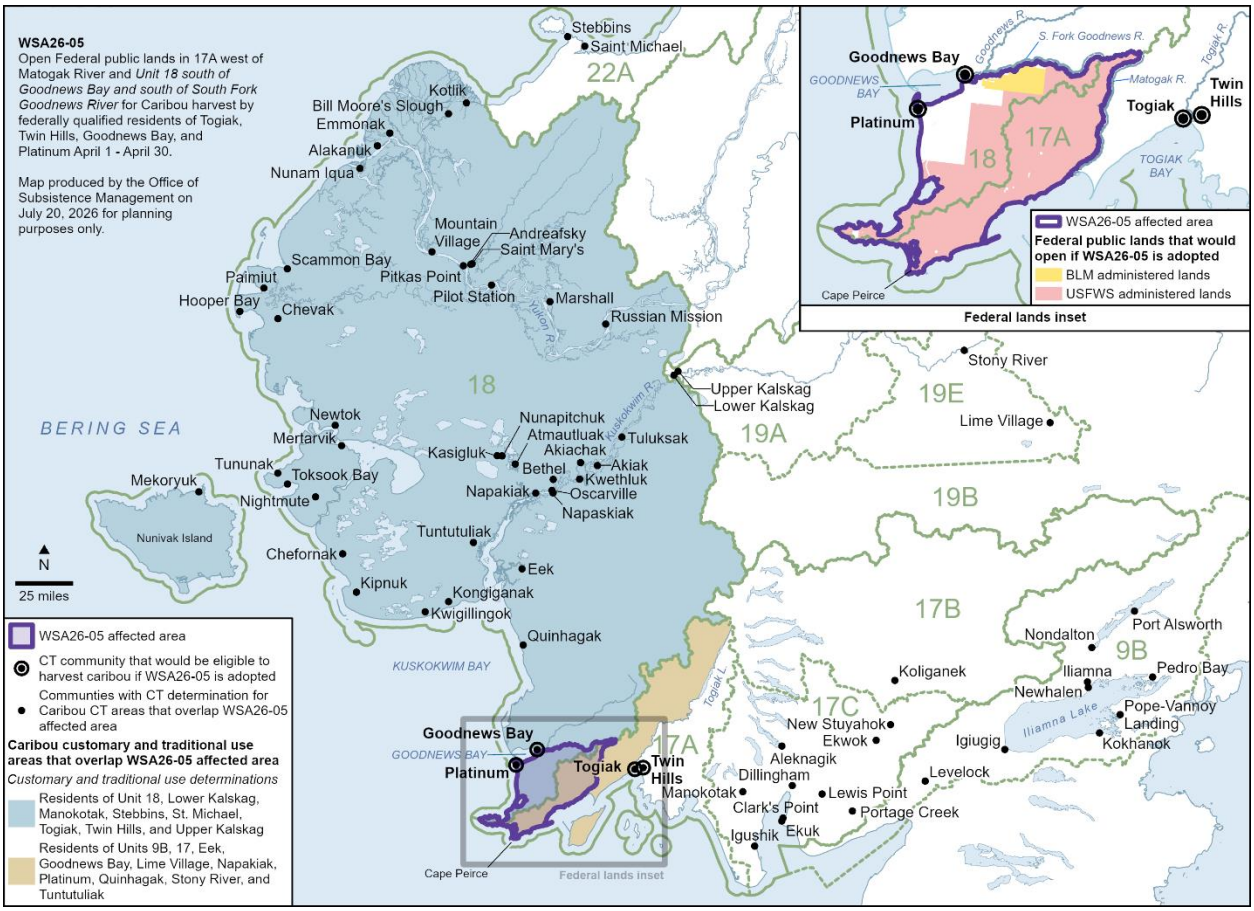
While the proponent's submitted request sought an April hunt, they later clarified that their intent was to establish a March hunt. Specifically, the proposed hunt would occur from March 1-31 with a harvest limit of one caribou in the portion of Unit 17A, west of the Matogak River and the portion of Unit 18, south of Goodnews Bay and south of South Fork Goodnews River. While not explicit in the submitted request, the proponent clarified this portion of Unit 18.

In an emergency situation, if necessary to ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons, the Board may immediately open or close public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for take for subsistence uses, or close public lands to take for nonsubsistence uses of fish and wildlife, or restrict the requirements for take for nonsubsistence uses. The applicable Federal regulations are found in 36 CFR 242.19(b) and 43 CFR 51.19(b) (Temporary Special Actions) and state that:

> *. . . After adequate notice and public hearing, the Board may temporarily close or open public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for subsistence take, or close public lands for the taking of fish and wildlife for nonsubsistence uses, or restrict take for nonsubsistence uses.*

Proponent Statement

The proponent states the summer 2026 photo census on Togiak National Wildlife Refuge (Togiak NWR), west of Togiak and south of Kanektok River, indicated that the resident caribou herd exceeds 1,400 animals. There were ~270 animals located on Cape Pierce and ~600 caribou around South Goodnews Bay and West of Togiak. The proponent states that caribou hunting has been closed since 2019 due to the low population of the Mulchatna Caribou Herd (MCH), and that the proposed hunt will provide increased subsistence opportunities for residents of Togiak, Twin Hills, Goodnews Bay, and Platinum. Unlike the MCH, the Cape Pierce resident herd does not migrate out of the area, allowing for a sustainable harvest while supporting the traditional use of caribou as an essential food and cultural resource. The proponent states that traditional knowledge indicates that this herd remains in the area year-round, and that this was confirmed by a March 2023 caribou collaring project conducted by the Togiak NWR and the Alaska Department of Fish and Game (ADF&G).



Map 1. Proposed hunt area, overlapping caribou Customary and Traditional Use determination areas, and communities federally qualified to harvest caribou under Federal subsistence regulations in these areas.

Current Federal Regulations

Unit 17—Caribou

Unit 17A, all drainages west of Right Hand Point—up to 2 caribou by State registration permit	*Season may be announced between Aug. 1 – Mar. 31*

Unit 18—Caribou

Unit 18, that portion to the east and south of the Kuskokwim River—up to 2 caribou by State registration permit	*Season may be announced between Aug. 1 – Mar. 15*

Proposed Federal Regulations

Unit 17—Caribou

*Unit 17A, all drainages west of Right Hand Point**, and east of the Matogak River**—up to 2 caribou by State registration permit*	*Season may be announced between Aug. 1 – Mar. 31*
Unit 17A, west of the Matogak River—1 caribou	***Mar. 1 – 31***

Federal public lands are closed to the harvest of caribou except by residents of Togiak, Twin Hills, Goodnews Bay, and Platinum hunting under this part for the 2026/27 and 2027/28 regulatory years.

Unit 18—Caribou

*Unit 18, that portion to the east and south of the Kuskokwim River**, and north of Goodnews Bay and north of the South Fork Goodnews River**—up to 2 caribou by State registration permit*	*Season may be announced between Aug. 1 – Mar. 15*
Unit 18, south of Goodnews Bay and south of South Fork Goodnews River—1 caribou	***Mar. 1 – 31***

Federal public lands are closed to the harvest of caribou except by residents of Togiak, Twin Hills, Goodnews Bay, and Platinum hunting under this part for the 2026/27 and 2027/28 regulatory years.

Relevant Federal Regulation

43 CFR 51.10 Federal Subsistence Board

(a) Powers and duties.

(1) The Board is empowered, to the extent necessary, to implement Title VIII of ANILCA, to:

(vi) Restrict the taking of fish and wildlife on public lands for nonsubsistence uses or close public lands to the take of fish and wildlife for nonsubsistence uses when necessary for the conservation healthy populations of fish or wildlife, to continue subsistence uses of fish and wildlife, or for reasons of public safety or administration. The Board may

also reopen public lands to nonsubsistence uses if new information or changed conditions indicate that the closure is no longer warranted;

(vii) Restrict the taking of a particular fish or wildlife population on public lands for subsistence uses, close public lands to the take of fish and wildlife for subsistence uses, or otherwise modify the requirements for take from a particular fish or wildlife population on public lands for subsistence uses when necessary to ensure the continued viability of a fish or wildlife population, or for reasons of public safety or administration. As soon as conditions warrant, the Board may also reopen public lands to the taking of a fish and wildlife population for subsistence users to continue those uses;

(viii) Establish priorities for the subsistence taking of fish and wildlife on public lands among rural Alaska residents;

(ix) Restrict or eliminate taking of fish and wildlife on public lands;

43 CFR 51.17 Determining priorities for subsistence uses among rural Alaska residents

(b) Whenever it is necessary to restrict the subsistence taking of fish and wildlife on public lands in order to protect the continued viability of such populations, or to continue subsistence uses, the Board shall establish a priority among the rural Alaska residents after considering any recommendation submitted by an appropriate Regional Council.

(c) The priority shall be implemented through appropriate limitations based on the application of the following criteria to each area, community, or individual determined to have customary and traditional use, as necessary:

(2) Customary and direct dependence upon the populations as the mainstay of livelihood;

(3) Local residence; and

(4) The availability of alternative resources.

(d) If allocation on an area or community basis is not achievable, then the Board shall allocate subsistence opportunity on an individual basis through application of the criteria in paragraphs (b)(1) through (3) of this section.

(e) In addressing a situation where prioritized allocation becomes necessary, the Board shall solicit recommendations from the Regional Council in the area affected.

Current State Regulations

Unit 17−Caribou

17A remainder, 17B, and 17C east of the east banks of the Wood River, Lake Aleknagik, Agulowak River, Lake Nerka, and the Agulukpak River	*Residents: 1 caribou by permit*	*RC503*	*No open season*
	Non-residents		*No open season*

Unit 18−Caribou

18	*Residents: 1 caribou by permit*	*RC503*	*No open season*
	Non-residents		*No open season*

Extent of Federal Public Lands

The proposed hunt area is comprised of approximately 84% Federal public lands that consist of approximately 79% U.S. Fish and Wildlife Service (USFWS) managed lands within Togiak NWR and approximately 5% Bureau of Land Management (BLM) managed lands (**Map 1**).

Customary and Traditional Use Determination

The proposed hunt area overlaps two Federal Customary and Traditional Use Determination areas for caribou. Residents of Units 9B, 17, Eek, Goodnews Bay, Lime Village, Napakiak, Platinum, Quinhagak, Stony River, and Tuntutuliak are eligible to hunt in Unit 17A, that portion west of the Izavieknik River, Upper Togiak Lake, Togiak Lake, and the main course of the Togiak River. Residents of Unit 18, Manokotak, St. Michael, Stebbins, Togiak, Twin Hills, Upper Kalskag, and Lower Kalskag are eligible to hunt in Unit 18 (**Map 1**). Residents of Eek, Goodnews Bay, Manokotak, Napakiak, Platinum, Quinhagak, Togiak, Tuntutuliak, and Twin Hills have customary and traditional use determinations for Unit 18 and that portion of Unit 17A discussed above.

Regulatory History

Mulchatna Caribou Herd

The proposed hunt area is within what is currently managed as part of the MCH range. Throughout the 1990s, the MCH grew significantly, peaking around 200,000 caribou in 1996, and its range expanded north and west from Units 9 and 17 into Unit 18 (OSM 2002). This expansion resulted in liberalization of harvest regulations. By 1997, both State and Federal hunt opportunities for the MCH extended from fall through spring, with liberal harvest limits and few restrictions.

The MCH population began declining in 2004, resulting in more restrictive harvest limits and season dates under both Federal and State regulations and the adoption of a registration permit (RC503). The details of regulatory actions taken in response to these population declines between 2006 and 2019 have been summarized in previous analyses (OSM 2022).

In August 2019, ADF&G issued emergency order 04-16-19, which decreased the harvest limit of the RC503 caribou registration permit hunt from two caribou to one caribou for the 2019/20 regulatory year. ADF&G issued this emergency order due to survey data indicating the MCH population was approximately 13,500 caribou, which was well below the minimum State objective of 30,000 caribou.

In November 2019, the Board approved Special Action Request WSA19-07 with modification to decrease the harvest limit for Mulchatna caribou from two caribou to one caribou across the range of the MCH for the 2019/20 regulatory year. The Board also delegated authority to the Togiak NWR Manager to open and close seasons throughout the range of the herd and to set sex restrictions in Units 9A, 9B, 9C, 17A, 17B and 17C for the 2019/20 regulatory year. The Board approved the request due to serious conservation concerns for the MCH and support from the affected Regional Advisory Councils and local users.

In December 2019, the Togiak NWR Manager closed caribou hunting to all users on Federal public lands across the range of the MCH for the remainder of the season. Agency staff determined no harvestable surplus existed and closed the season to promote herd recovery.

In January 2020, ADF&G issued emergency order 04-02-20, which closed the RC503 caribou registration permit hunt on January 31, 2020. ADF&G issued this emergency order because of declines in the MCH population.

In July 2020, the Board approved Special Action Request WSA20-04 with modification to delegate authority to the Togiak NWR manager to open/close seasons, announce harvest limits, and set sex restrictions across the range of the MCH for the 2020-2022 regulatory cycle. The Board approved the request because of conservation concerns for the MCH due to substantial population declines, because delegating authority to an in-season manager provided the management flexibility needed to respond quickly to changing conditions, and because of support from the affected Regional Advisory Councils and local users.

Also in July 2020, ADF&G issued emergency order 04-04-20, announcing a bulls-only hunt across the range of the MCH in Units 9A, 9B, 9C, 17A, 17B, 17C, 18, 19A, and 19B from Aug. 1-Sept. 20, 2020. The Togiak NWR manager and ADF&G determined that a limited bulls-only hunt would provide some harvest opportunity without compromising herd recovery, but that additional harvest, especially of cows, needed to be avoided to allow for herd growth.

In July 2021, ADF&G issued emergency order 04-05-21, announcing that the State and Federal caribou registration permit hunt for the MCH would not be offered that year.

In 2022, the Board adopted WP22-41, modifying Federal caribou seasons throughout the MCH range to may be announced seasons with a harvest limit of up to two caribou. This action also made permanent the temporary delegation of authority issued to the Togiak NWR manager via Special Action in 2020 (FSB 2022).

Also in 2022, the Alaska Board of Game (BOG) considered three State proposals related to the MCH. Proposal 19 requested to establish a new population and harvest objectives for the MCH in Units 9, 17, 18, and 19. Proposal 20 requested to establish a Tier II subsistence hunt and bag limit for the MCH. The BOG took no action on these proposals, reporting that there was currently insufficient data to act on them and that it would be premature given the status of the herd. The BOG adopted Proposal 21 with amendment to establish a second predator control area for MCH on Federal lands in Units 17A and 18, and they extended this plan to be in place until 2028.

In 2023, the BOG approved the implementation of a bear and wolf intensive management program in Units 17 and 18 outside of the proposed hunt area to increase abundance of the MCH. ADF&G has been conducting wolf and bear removals since 2023, and this is currently planned to continue through 2028.

In 2024, the BOG approved Proposal 6 to adopt a 3-year closure to caribou hunting in Unit 18. In 2025, the BOG rejected Proposals 29 and 30 and took no action on Proposal 31. Proposal 29 requested to review the population and harvest objectives for the MCH and Proposal 30 requested to implement a three-year moratorium on caribou hunting in Units 9, 17, and 19. The BOG took no action on Proposal 31, which requested to close the resident caribou season in Units 9B, 17, and 19, because this season was already closed.

<u>Units 17 and 18 Caribou Customary and Traditional Use Determinations</u>

Because this request asks that the Board prioritize a subset of federally qualified subsistence users for the proposed hunt, it is relevant to consider the regulatory history of Federal customary and traditional use determinations and ANILCA §804 closures in Units 17 and 18.

Federal customary and traditional use determinations for caribou in Units 17 and 18 have been in place since the start of the Federal Subsistence Management Program in 1990 but have been revised several times (see **Appendix 1**). Residents of Kwethluk have had a customary and traditional use determination for caribou in portions of Units 17A, 17B, and all of Unit 18 since this time. Residents of Unit 9B, Unit 17, Lime Village, and Stony River have had a customary and traditional use determination for caribou throughout Unit 17 for most of this time (see below).

In December 1991, the Federal Subsistence Board (Board) established a winter hunt for the Kilbuck Caribou Herd, which occupied Unit 18 south of the Kuskokwim River, and established a new customary and traditional use determination recognizing 18 communities as federally qualified to harvest from the Kilbuck Herd (**Appendix 1**). The Board also modified the existing determination for residents of Kwethluk to apply to all of Unit 18, except the Kilbuck Herd (57 Fed. Reg. 104. 22960. [May 29, 1992]).

In 1994, an additional caribou hunt and customary and traditional use determination was adopted via Temporary Special Action when the Western Arctic Caribou Herd began periodically occupying the northeast portion of Unit 18 (60 Fed. Reg. 27. 10318. [February 24, 1995]). This determination, which recognized 13 communities as federally qualified to harvest caribou in Unit 18 north of the Yukon River (**Appendix 1**), became permanent and was expanded to include four additional communities when the Board adopted Proposal 95-37 (60 Fed. Red. 115. 31549. [June 15, 1995]).

The Board also adopted Proposal 94-42 in 1994, which established a winter hunt in portions of Units 17A and 17C for the reintroduced Nushagak Peninsula Caribou Herd (NPCH). The Board closed the NPCH hunt to all users except residents of Aleknagik, Clark's Point, Dillingham, Ekuk, Manokotak, Togiak, and Twin Hills (59 Fed. Reg. 106. 29051. [June 3, 1994]). This Board action implemented an Alaska National Interest Lands Conservation Act (ANILCA) §804 prioritization among FQSUs without a formal ANILCA §804 analysis. The Board explained that these seven communities located in the vicinity of the herd had been integral to the reintroduction and management of the herd, that studies had shown caribou to be a key component of subsistence economies in four of the seven communities (Aleknagik, Clark's Point, Dillingham, and Manokotak), and that supporting the proposal was consistent with the Bristol Bay Subsistence Regional Advisory Council's (Bristol Bay Council) recommendation and the terms of the Nushagak Caribou Management Plan (FSB 1994).

In 1999, the Board acted on two proposals modifying customary and traditional use determinations for caribou in Unit 18. Proposal 99-37 requested to add all residents of Unit 18 to the existing determination for portions of Units 17A and 17B. Proposal 99-38 requested to establish a new determination in a portion of Unit 17A for residents of Eek and Quinhagak (OSM 1999b). The Board adopted a modified version of these proposals, recognizing residents of Eek, Quinhagak, Goodnews Bay, Platinum, Tuntutuliak, and Napakiak as federally qualified to harvest caribou in a portion of Unit 17A and that portion of Unit 17B within Togiak NWR. The Board also included residents of Bethel in the determination for that portion of Unit 17B (64 Fed. Reg. 126. 35783. [July 1, 1999]). Other Unit 18 communities were excluded from this determination because there was either a lack of available data on caribou harvest areas or because available data indicated caribou harvest occurred elsewhere (FSB 1999).

The Board made additional changes to Unit 17 caribou customary and traditional use determinations in 2000. Proposal 00-34 asked to add residents of Akiak and Akiachak to the existing determinations for Unit 17 and for portions of Units 17A and 17B. Proposal 00-35 examined whether residents of Napaskiak and Tuluksak, which were not considered in the analysis for proposal 99-37 (OSM 1999a), should have a customary and traditional use determination for caribou in Unit 17. The Board adopted modified versions of these proposals, establishing a new determination in a portion of Unit 17A for residents of Akiak, Akiachak, and Tuluksak, and adding these same communities to the existing determination for Unit 17B within Togiak NWR (65 Fed. Reg. 127. 40737. [June 30, 2000]).

By the early 2000s, the growing MCH had overtaken the Kilbuck Herd in Unit 18. In 2002, the Board adopted WP02-28a/b to modify Unit 18 caribou hunt areas and opportunities so they were not herd-specific and modified season dates to open earlier. This action also simplified customary and traditional use determinations to be unit-wide rather than herd- or area-specific. As a result, residents of Unit 18, St. Michael, Stebbins, Togiak, Twin Hills, Upper Kalskag, and Manokotak became federally qualified to

harvest caribou under Federal regulations throughout all of Unit 18. (68 Fed. Reg. 124. 38472. [June 27, 2003], **Appendix 1**).

In 2007, the customary and traditional use determinations for caribou in Unit 17 were revised such that the determination for "Unit 17" was modified to apply only to "Unit 17 remainder" (72 Fed. Reg. 247. 73433. [December 27, 2007], **Appendix 1**). This change meant that residents of Units 9B, 17, Lime Village, and Stony River were only eligible to harvest caribou under Federal subsistence regulations in Unit 17 remainder, as opposed to all of Unit 17. This appears to have been an administrative oversight that was corrected in 2016, when these communities were added to each customary and traditional use determination area in Unit 17 (81 Fed. Reg. 152, 52536. [August 8, 2016], **Appendix 1**).

By 2016, the NPCH had grown and there were concerns about overgrazing (OSM 2026). In 2016, the Board approved Special Action Request WSA16-02 to open Federal public lands in the NPCH hunt area to all users as long as the population did not fall below 900 animals. These actions removed the ANILCA §804 restrictions that limited harvest to only a subset of federally qualified subsistence users. These temporary regulations became permanent in 2018 when the Board adopted WP18-22 as modified by the Bristol Bay Council (FSB 2018).

Also in 2018, the Board adopted proposal WP18-23 as modified by the Office of Subsistence Management (OSM) and the Bristol Bay Council. This proposal expanded the pool of users federally qualified to harvest from the NPCH by adding residents of Units 9C and 9E to the existing customary and traditional use determination for caribou in Unit 17 remainder (FSB 2018).

Current Events

A public hearing to receive comments on this request is scheduled for October 27, 2026. The Yukon-Kuskokwim Delta and Bristol Bay Councils will also be considering this request during their fall meetings in late October.

The Togiak Fish and Game Advisory Committee (AC) submitted State Proposal 55, which requests establishing a registration permit hunt for caribou in the Cape Newenham and Goodnews Bay area of Unit 18 under State regulations. The proposal requests a Jan. 1-Feb. 28 season with a harvest limit of one caribou per household by registration permit with an annual harvest quota of 70 caribou. Only residents of Togiak, Goodnews, Twin Hills, Manokotak, and Platinum would be eligible. The BOG will consider this proposal in January 2027.

Biological Background

Caribou in the Cape Pierce area are currently managed as part of the MCH (**Map 2**). The MCH peaked at approximately 200,000 caribou in 1996 but declined to approximately 16,276 caribou in 2025. Since the decline, the MCH has segregated into multiple spatially distinct groups throughout its historic range. The current range of the core group of Mulchatna caribou has contracted substantially, encompassing a much smaller geographic area to the northwest of Cape Pierce (**Map 3**) (ADF&G 2026a, Landsiedel and Lichwa 2026).

Collar tracking indicates that the caribou in the Cape Pierce area are not mixing with the core group of the MCH. After 10 years of tracking the MCH and two years of tracking the Cape Pierce caribou, no mixing

of Cape Pierce and Mulchatna caribou have been documented. Additionally, the Cape Pierce caribou have distinct calving grounds and annual ranges that do not overlap with the core MCH groups, warranting consideration to manage them as separate populations (ADF&G 2024, 2025).

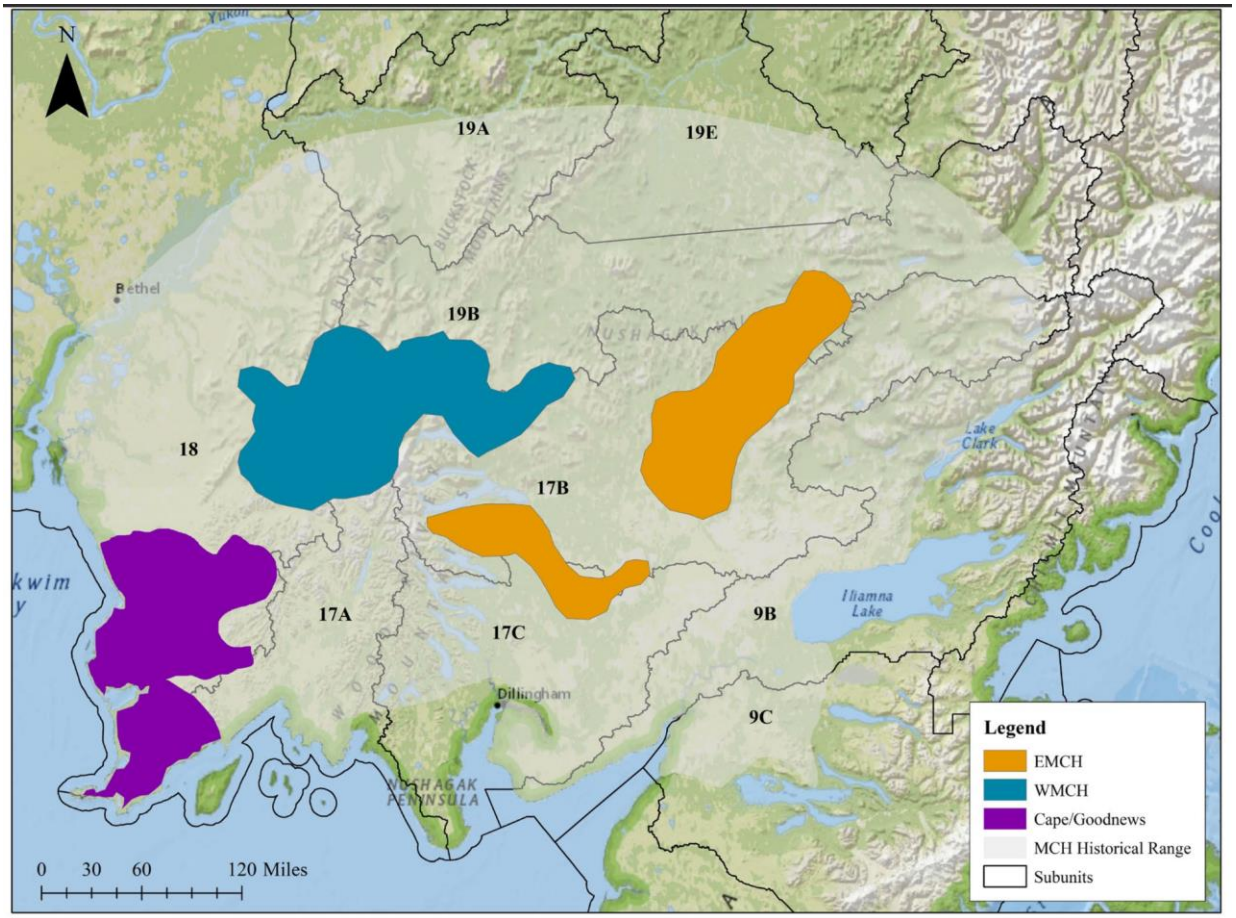
Caribou abundance in the Cape Pierce area has increased over the past six years. ADF&G (2022) estimated 25 caribou in the area circa 2019-2020. In March 2021, Togiak NWR staff observed ~175 caribou in the Slug River drainage (outlets just north of Cape Pierce). In July 2021, Togiak NWR conducted an aerial survey in the vicinity of Cape Newenham (west of Matogak River and South of Goodnews Bay, **Figure 1**), observing 71 caribou and noting many caribou were likely missed (Togiak NWR 2021, Cawlfield 2026, pers. comm.).

Since 2022, when radio-collaring of the Cape Pierce caribou began, ADF&G and the Togiak NWR have conducted aerial population surveys in June or July for the Cape Pierce herd by locating radio-collared caribou (**Map 4**). The Cape Pierce caribou group does not aggregate strongly or have enough collared individuals for a population estimate, so minimum counts are reported (ADF&G 2024).

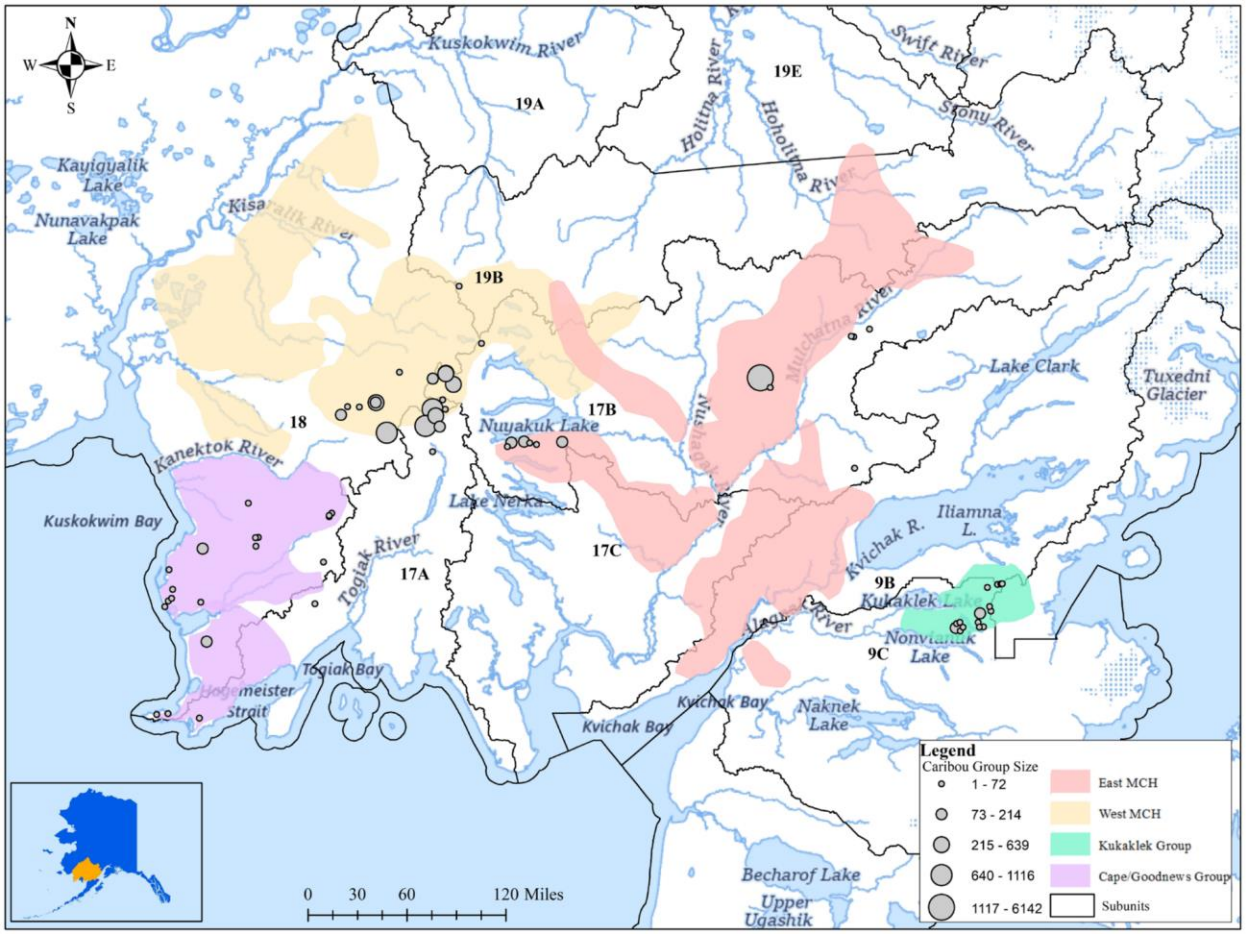
The survey area from 2022-2024 was the western coast of Togiak National Wildlife Refuge extending inland to the Matogak River and Arolik Lake. In 2025, the survey area was expanded to south of Kanektok River and west of the Togiak River (**Figure 1**). While the minimum count increased substantially in 2025 with the expanded survey area (**Table 1**), survey methodology also changed and likely accounts for some of the increase. Prior to 2025, collared caribou were primarily utilized to locate groups and estimate minimum counts. Groups without collars were observed incidentally while tracking collars. In 2025, increased survey time was spent surveying summer caribou habitat throughout the survey area for incidental caribou groups without collars, in addition to utilizing telemetry to locate groups containing a radio-collared cow. Minimum counts of caribou within the requested hunt area increased from 29 caribou in 2023 to 317 caribou in 2026 (**Table 1,** Cawlfield 2026, pers. comm.).

During 2022 and 2023 October composition surveys, ratios of 44 bulls:100 cows and 46 calves:100 cows were observed (Togiak NWR 2024) (**Table 1**). Unfortunately, no composition survey was conducted in 2025; one is planned for October 2026. Cape Pierce caribou calve in mid-May within the proposed Cape Pierce hunt area (Cawlfield 2026, pers comm.).

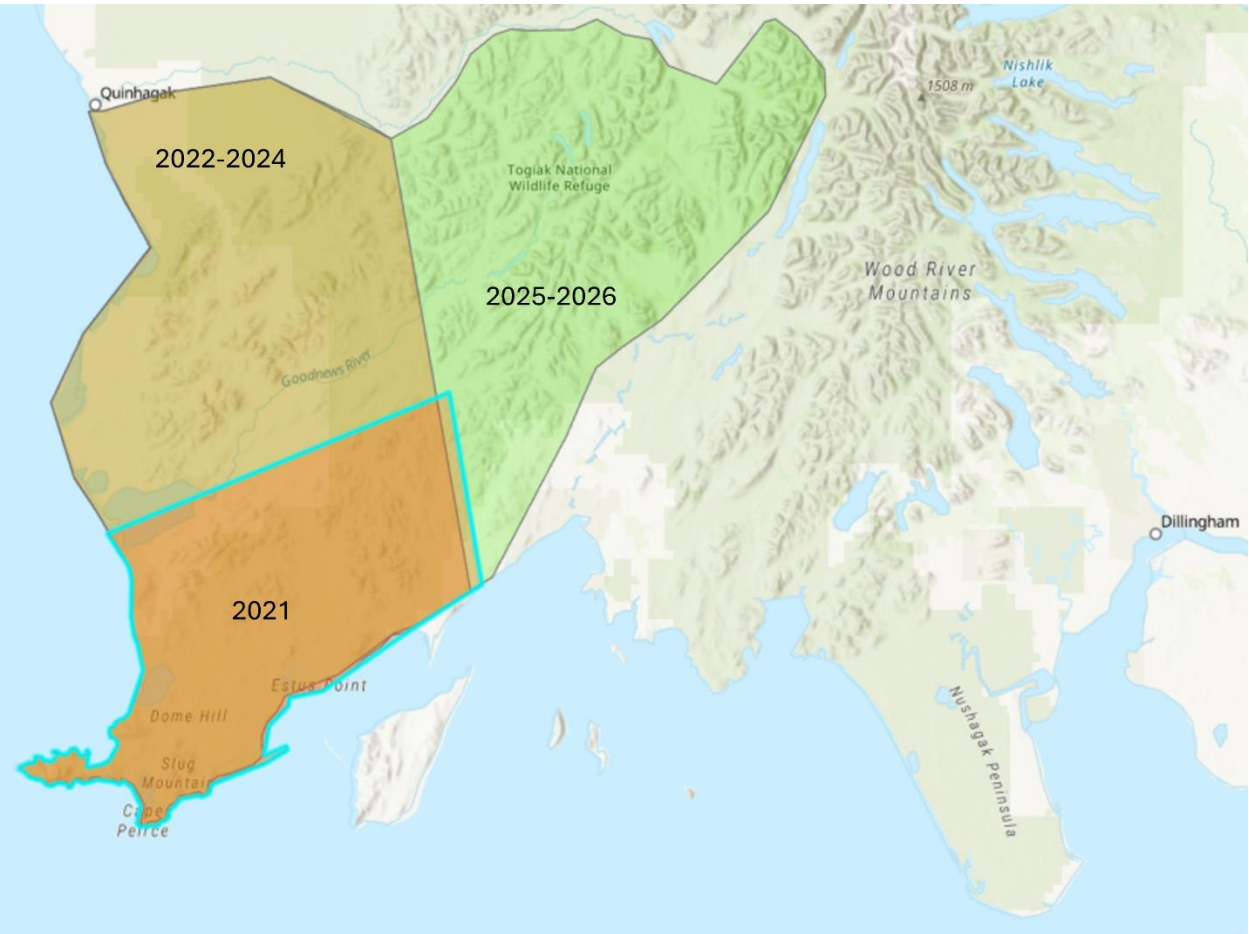
Map 2. Extent of the RC503 registration permit hunt area specific to the Mulchatna caribou herd in Southwestern Alaska. This permit area generally applies to both State and Federal regulations and includes the Cape Pierce area affected by this request. The area in Units 17A and 17C excluded from the RC503 permit area is for the Nushagak Peninsula Caribou herd (Landsiedel and Lichwa 2026).



Map 3. Summer range map of the Mulchatna caribou herd in 2023 depicting the east (EMCH) and west (WMCH) segments and outlying groups in portions of Units 17, 18, and 19. The Cape/Goodnews caribou group in purple overlaps with the are affected by this request (ADF&G 2025).



Map 4. Mulchatna caribou group locations across the range of the Mulchatna Caribou Herd 2024 photo survey in context with their calendar year 2021 annual range (ADF&G 2024).



Map 5. Map of caribou survey areas. The orange area outlined in blue is the 2021 survey area. The yellow area is the 2022-2024 survey area (also includes 2021 survey area). The green area is the expanded survey area in 2025 and 2026 (also includes 2021-2024 survey areas) (Cawlfield 2026, pers. comm.).

Table 1. Minimum counts and composition data for caribou within the Cape Pierce area (ADF&G 2022, 2023, 2024, 2025; Togiak NWR 2021, 2024; Cawlfield 2026, pers. comm.). Dashed lines indicate data was not collected or available.

	Minimum Count	Active Collars	Collars found	Bulls:100 Cows	Calves:100 Cows	Minimum Count within proposed hunt area
2021	71	-	-	-	-	71
2022	470	12	-	44	46	-
2023	639	19	-	44	46	29
2024	466	18	14	-	-	-
2025[a]	1,464	25	7	-	-	241
2026[a]	1,349	19	9	-	-	317

[a]Expanded survey area.

Cultural Knowledge and Traditional Practices

The proposed hunt area is within what is currently managed as the MCH range (ADF&G 2025, Van Lanen et al. 2018). However, the MCH range and population have fluctuated significantly over the past ~65 years, and both Traditional Ecological Knowledge (TEK) and population monitoring data indicate that several smaller herds have historically occurred throughout Units 9, 17, 18, and 19 (Van Lanen et al. 2018, Hinkes et al. 2005). For residents in the region, the fluctuating nature of caribou populations means that the MCH is perceived locally "not as a herd which exists as a large single mass, but more as a collection of diverse and both distinct and indistinct caribou subgroupings, with their own tterns of seasonal movements and locations" (Van Lanen et al. 2018: 93). Household subsistence surveys and participatory mapping data[1] spanning 1960 to 2015 offer important data about the highly variable presence, abundance, and migratory patterns of caribou herds in the proposed hunt area. These data are briefly summarized below.

From 1960-1989, local residents reported that caribou were scattered throughout the Cape Pierce, Cape Newenham, and Goodnews River drainage area, but that most caribou were concentrated further north and east in Units 17 and 19 (Van Lanen et al. 2018). Throughout the 1980s, the Kilbuck Mountains became an additional area with more concentrated caribou abundance, and many residents in Unit 18 and western Unit 17 relied on the Kilbuck Caribou Herd in this area for subsistence harvests (Van Lanen et al. 2018). However, it was also around this time that residents of Togiak and Twin Hills began seeing more caribou from the Togiak River to the Goodnews River, in the Kanektok and Arolik Rivers areas, and along the Bering Sea coastline south from Togiak Bay, Hagemeister Strait to Osviak, and Cape Pierce (Coiley-Kenner et al. 2003, Wolf et al. 1984). As caribou moved into the area from the north and east, many hunters in southern Unit 18 and Unit 17A were able to harvest caribou closer to home than in previous years (Brown et al. 2013, Coffing et al. 2001, Simon 2016).

From 1990-1999, the MCH grew rapidly and expanded their range north and west, overtaking the Kilbuck Caribou Herd in the process (Van Lanen et al. 2018). Residents report that during this time caribou became more concentrated year-round in the northern portion of the Cape Pierce / Cape Newenham region but remained more scattered further south to the coast (Van Lanen et al. 2018). Telemetry data from these years also documents the presence of caribou in the region but suggests the caribou in this area were scattered rather than concentrated (Van Lanen et al. 2018). From 2000-2015, the MCH population began declining and shifting its range north, and local residents reported that the Cape Pierce / Cape Newenham area once again became an area of scattered caribou abundance (Van Lanen et al. 2018). However, telemetry data indicate MCH caribou concentration in this area was high during the 2010s (Van Lanen et al. 2018, **Figures 1-4**).

Hunters interviewed in 2015 identified around one dozen low-density caribou populations within the larger MCH range, including a population near Cape Newenham along the shores of Hagemeister Strait and Chagvan Bay in Units 18 and 17A (Van Lanen et al. 2018). ADF&G biologists similarly have

[1] Van Lanen et al. (2018) produced Traditional Ecological Knowledge maps of caribou range areas, hunting areas, and environmental change with 32 respondents from Bethel, Dillingham, Eek, Ekwok, Igiugig, Koliganek, Kwethluk, Lime Village, Napaimute, New Stuyahok, Nondalton, Stony River, and Togiak.

reported subgroups of Mulchatna caribou, including in the Cape Newenham / Cape Pierce area and in Goodnews Bay up to the Kanektok River (ADF&G 2022, 2023, 2024, 2025; BBRAC 2023: 70). Unlike most other identified subgroups, the caribou in the Cape Newenham / Cape Pierce area rely year-round on low elevation, coastal areas rather than on mountainous, high elevation terrain (Van Lanen et al. 2018).

TEK presented by Van Lanen et al. (2018) and knowledge shared during Bristol Bay and Yukon-Kuskokwim Delta Council meetings suggest that the Cape Newenham / Cape Pierce caribou population became established when the MCH expanded in the 1990s (YKDRAC 1995, 2002, 2023; Van Lanen et al. 2018; BBRAC 1999, 2002, 2003, 2004, 2022, 2026). However, some residents have suggested this population originated from the Nushagak Peninsula, rather than from the Mulchatna herd. For instance, one Bristol Bay Council member from Togiak described that the caribou in the Cape Newenham / Cape Pierce area migrated from the Cape Constantine area of the Nushagak Peninsula in 1993 (YKDRAC 2002: 78). This Council member stated the herd began growing because residents of Goodnews Bay had opted not to hunt in the area:

> The Cape Constantine Herd over there is overflowing toward our village…In fact, we have two herds over there right now. One is by Cape Nunahan [Newenham] that started about nine years ago, started with only 12 [animals] in the herd. So I talked to Goodnews Bay to leave those alone. Today we have over 80 animals in that group. So those are the residents we're talking about right now. The Mulchatna and the Kilbuck hardly come by there or are around anymore, but they both have the same dialect now. They both understand each other (YKDRAC 2002: 78).

Similarly, a member of the Bristol Bay Council reported that caribou in the Cape Pierce area moved into the area from the Nushagak Peninsula and grew from an estimated 60 or 70 animals in 2002, to an estimated 200 animals in 2003:

> The past years, you know, remember we were fighting about the caribous between Twin Hills, and I suspected those are from the [Nushagak] Peninsula Herd, and then soon some of them moved down around Osviak. You can tell a difference between a migrant caribou and then a resident caribou. Those caribous around there across from Goodnews Bay, over that area, those are still from the Peninsula down there because they don't go anywhere. I think we started out with 12 or 25 and now there's over 200 in that group there (BBRAC 2003: 74).

More recently, a Bristol Bay Council member asserted that these caribou may be Mulchatna caribou that interbred with feral domestic reindeer:

> We, you know, there's that herd in the peninsula, that Nushagak peninsula, and then and then back home we would prefer go down to Newenham area for the caribou down there. I know they're…they've been there for a while. When they…there are some reindeer left from that herd they had in Hagemeister. And then they had [the reindeer] fenced in and then they took off somewhere. So, I think that…I think [the caribou] went down that way.

> And then some of that Mulchatna herd, I think maybe was still down there (BBRAC 2026: 24).

Of note, refuge biologists have stated that radio-collar data suggested it was unlikely these caribou were from the NPCH (BBRAC 2003: 75) and that it was likely that these animals were a mix of Kilbuck and Mulchatna caribou (BBRAC 1996: 68). These varying opinions echo perceptions documented by Van Lanen et al. (2018), who report that residents of Unit 18 communities often describe unclear distinctions between Mulchatna caribou, Kilbuck caribou, and feral reindeer inhabiting the Kuskokwim and Kilbuck mountains.

Other residents in the region assert that caribou inhabiting mountainous areas are original MCH caribou, but that lowland caribou are feral reindeer hybrids (Van Lanen et al. 2018). Caribou in low elevation areas are described as having smaller bodies, smaller antlers, and aggregating in smaller groups than caribou found in higher-elevation areas (Van Lanen et al. 2018). Some people believe caribou found in lower elevation areas are barren ground caribou (*Rangifer tarandus granti*) while caribou occupying higher elevation areas are woodland caribou (*Rangifer tarandus caribou*) (Van Lanen et al. 2018).

While perspectives differ on the origin of these caribou, the timing of caribou arriving to the Cape Pierce / Cape Newenham area described by Council members aligns with information shared by refuge staff familiar with the region (BBRAC 2022: 151) and with the proponent's statement that they have been hunting in this area for 20-30 years:

> My people have been hunting that area for as long as I can remember. I think I started hunting that area 20 to 30 years ago and I've been traveling with older elders back…the older people that know that area (FSB 2026: 347).

Van Lanen et al.'s (2018) documentation of Mulchatna caribou TEK highlights that subpopulations of caribou are "key to the long-term resilience both of the caribou population and the subsistence caribou hunting culture" (Van Lanen et al. 2018: 97). During periods of population decline and range contraction, smaller caribou subpopulations provide critical access to sustain some level of caribou hunting and harvest (Van Lanen et al. 2018), as evidenced by the proponent's request and similar requests made to Federal and State staff at Bristol Bay Council meetings (BBRAC 2024, 2026).

Weather has become an increasingly important factor in when and where hunters seek caribou in recent years, as hunters have reported that weather has generally gotten warmer over the past several decades (FSB 2024). Local hunters have explained that, "In addition to trends towards warmer temperatures during late-fall and early-spring, study respondents reported large-scale changes in snow and ice cover throughout the duration of winter, and that the normal freezing of waterbodies such as lakes and rivers has now also become unreliable" (Van Lanen et al. 2018: 140). These changing weather patterns can lead to changes in caribou migration patterns and make well-established methods of accessing caribou more difficult and dangerous. For example, hunters may not cross the Wood River or Nushagak River when ice conditions are unsafe (Van Lanen et al. 2018). This prevents hunters from Manokotak, Aleknagik, and Dillingham from hunting along the Nushagak River and its tributaries (Van Lanen et al. 2018). Likewise, ice cover is not as reliable from year-to-year on the Osviak, Matogak, Quigmy, Togiak,

and Negukthilik rivers and their tributaries, making it challenging for residents of Togiak and Twin Hills residents to hunt even in these relatively accessible areas (Van Lanen et al. 2018).

Ultimately, both TEK and population monitoring data collected from the 1990s-2015 document consistent presence of caribou in the Cape Pierce / Cape Newenham area. Some residents describe the Goodnews River drainage and coastal areas of southern Units 17A and 18 as wintering grounds, saying that these areas provide habitat with shallower and windblown snow for migratory caribou (Van Lanen et al. 2018). For instance, one Togiak elder stated that, "many of them migrate down from the north in winter [during February], they come from the Bethel and Eek area, and then they go back up north in springtime" (Van Lanen et al. 2018: 135). However, telemetry data and surveys conducted since 2022 indicate that caribou in this area do not appear to be migrating towards or mixing with the larger Mulchatna herd and confirm that caribou occur from Cape Newenham north through the Goodnews drainage up to the Arolik River near Quinhagak (ADF&G 2022, 2023, 2024, 2025; BBRAC 2022, 2023, 2025; YKDRAC 2023). Based on these data, ADF&G (2025) stated it may be prudent to no longer consider this group to be part of the Mulchatna herd.

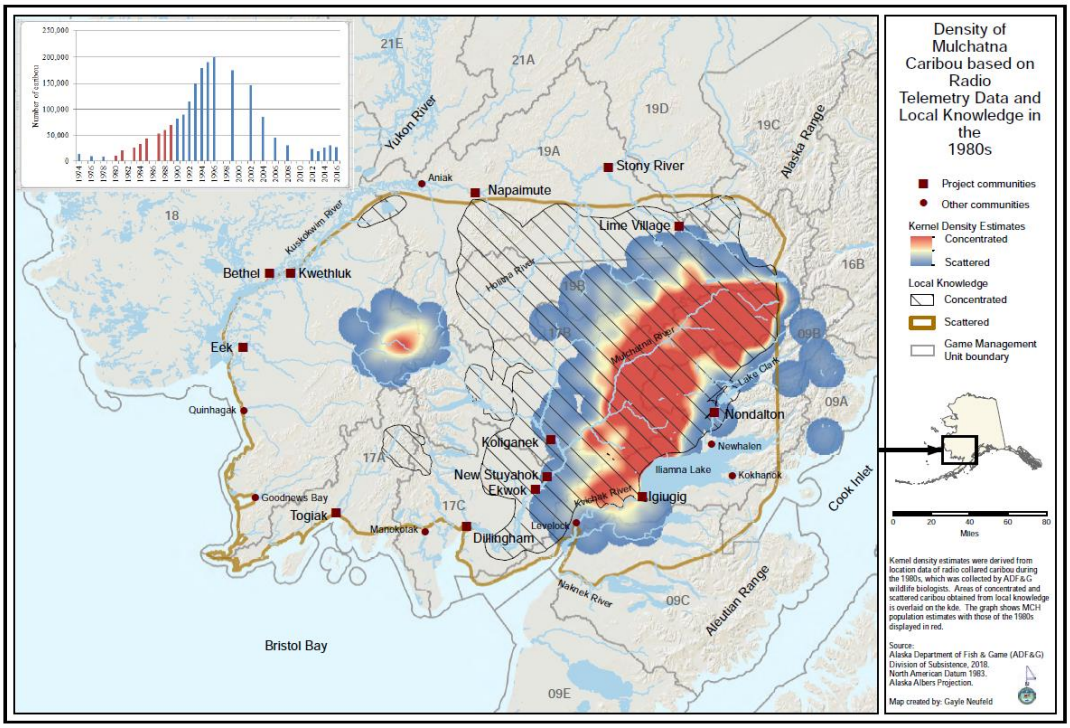


Figure 1. Map of caribou range use from 1980-1989 based on radio telemetry and TEK. Reproduced from Van Lanen et al. (2018).

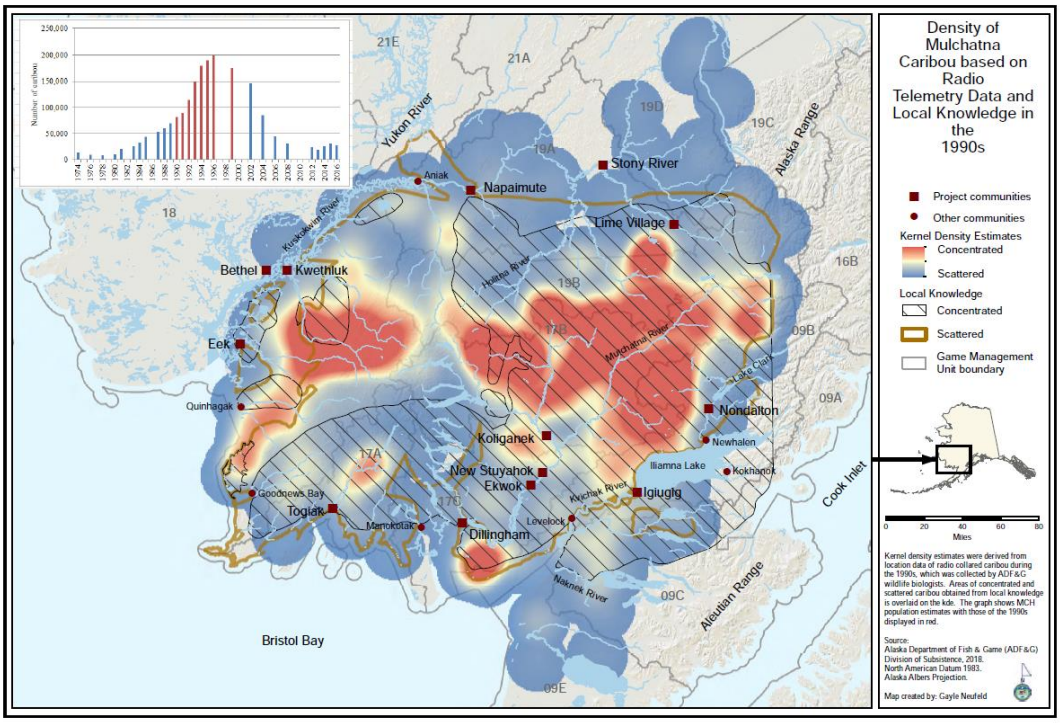


Figure 2. Map of caribou range use from 1990-1999 based on radio telemetry and TEK. Reproduced from Van Lanen et al. (2018).

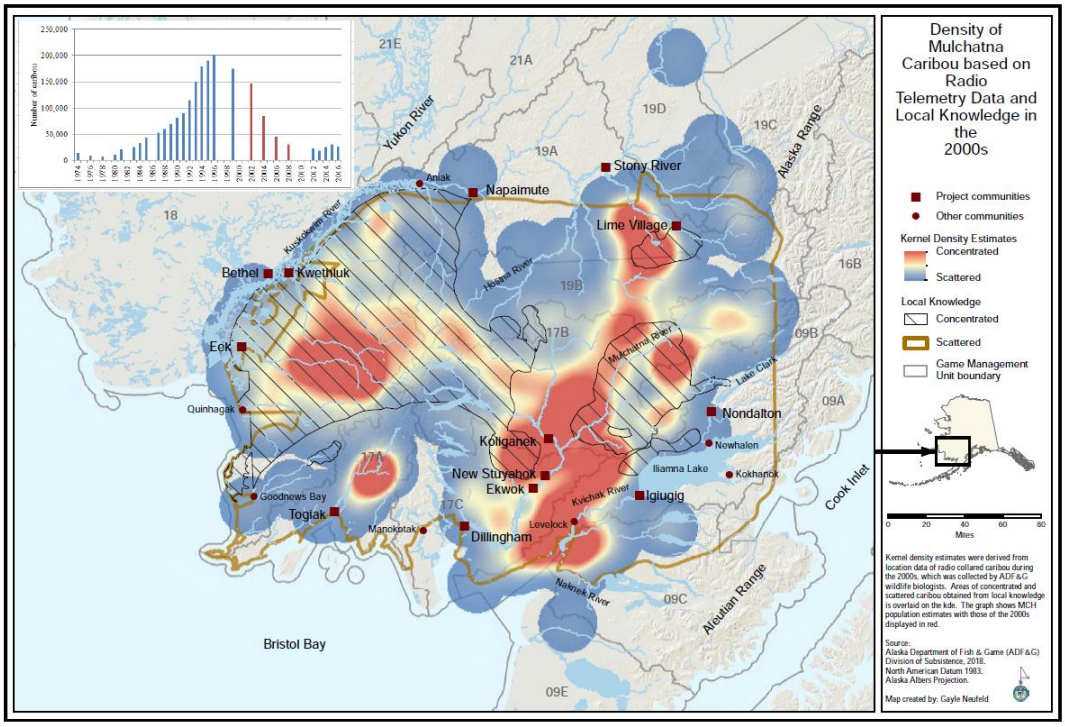


Figure 3. Map of caribou range use from 2000-2009 based on radio telemetry and TEK. Reproduced from Van Lanen et al. (2018).

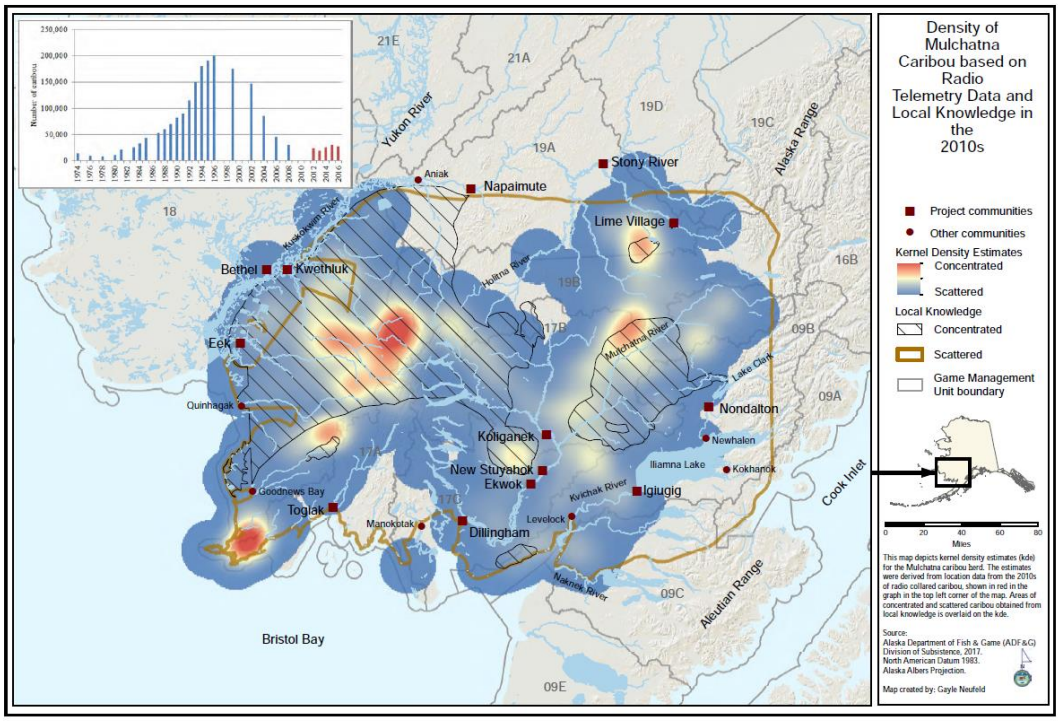


Figure 4. Map of caribou range use in 2010s based on radio telemetry and TEK. Reproduced from Van Lanen et al. (2018).

Harvest History

Legal caribou hunting within the area covered by this request has been closed since 2021 under both State and Federal regulations, due to the decline of the MCH. Harvest in this area has been by RC503 registration permit under both State and Federal regulations (**Map 2**). Data on harvest patterns documented in household subsistence surveys are discussed in the following section.

Section 804 User Prioritization

ANILCA §804 mandates that the taking on Federal public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes. ANILCA §804 further requires that whenever it is necessary to restrict the taking of populations of fish and wildlife on such lands for subsistence uses in order to protect the continued viability of such populations, or to continue subsistence uses, such a priority shall be implemented through appropriate limitations based on the application of three criteria.

These three criteria are: (1) customary and direct dependence upon the populations as the mainstay of livelihood, (2) local residency, and (3) the availability of alternative resources. This proponent asks the Board to prioritize residents of Togiak, Twin Hills, Goodnews Bay, and Platinum for the proposed hunt However, an analysis based on §804 of ANILCA considers all federally qualified subsistence users and identifies which communities or areas have a priority for the take of a resource in a particular area. The

goal of this portion of the analysis is to help the Board identify those federally qualified subsistence users that may meet the criteria for prioritization for the proposed hunt.

Dependence on the resource

Residents of nine communities have a Federal customary and traditional use determination for caribou in both the Unit 17 and Unit 18 portions of the proposed hunt area, and an additional 52 communities are federally qualified to hunt in only one of the two units within the proposed hunt area (**Table 2**). Eligible communities extend from the southern reaches of Unit 22, across Unit 18 and into the southwestern corner of Unit 19, throughout Unit 17, and in Units 9B, 9C, and 9E (**Map 1**). These communities comprise diverse cultural groups and traditions, including Central Yup'ik, Tanaina Athabascan, Alutiiq, Dena'ina Athabascan, Russian Orthodox, and Euro-American groups (ACCED 2026). The vast geographic expanse of federally qualified subsistence users for this area reflects both the extensive distances people will travel to harvest caribou (e.g., Krieg et al. 1996, 1998; Holen et al. 2011, OSM 2018) and, for Unit 18, the adoption of a unit-wide customary and traditional use determination that includes Kuskokwim River and Yukon River drainage communities (see **Regulatory History**).

Archaeological, historical, and contemporary sources demonstrate that caribou have long been a critical subsistence resource for residents in western and southwestern Alaska (Lantis 1984; VanStone 1984a; Ackerman 1979, 1980, 1996, 2001; Morseth 2003; Boraas 2004; Gaul 2007; Britton et al. 2013; Branson 2014; Gigleux et al. 2017). Historically, a large caribou herd ranged from the coast of the Bering Sea from Bristol Bay to Norton Sound (Skoog 1968, Aderman 2015). Archaeological excavations conducted near Togiak suggest that caribou were important to people living in the area from 1000–1700 A.D. (Kowta 1963, Aderman 2015). Numerous large caribou herds were observed near the headwater lakes of the Igushik River in the early 1800s (VanStone 1988), and large numbers of caribou were also observed near Cape Newenham in the late 1800s (Petroff 1884). However, caribou were absent in the Togiak and Goodnews drainages as early as the 1900s (Aderman 2015). Around this time, reindeer herding was brought to the region, but the industry failed by the mid-1940s (Willis 2006, Aderman 2015).

Historically, people in Western and Southwestern Alaska hunted caribou in the spring and fall with the occasional summer harvest. Historical accounts suggest that caribou were an important subsistence resource for food and the creation of winter clothing. Caribou were traditionally caught using snares, surrounds, guide fences, bow and arrow, stalking, spears, and dogs (Hosley 1981; Snow 1981; Townsend 1981). Extensive data documents that caribou have continued to be a critical subsistence resource for communities throughout this region (e.g., Evans et al. 2013; Fall et al. 2006; Holen et al. 2005, 2011, 2012; Kari 1983, 1985; Krieg et al. 1996, 1998, 2009; Simon 2016). Caribou and other large land mammals are often harvested by younger hunters and shared broadly across the community and sharing networks due to the physically demanding nature of this hunting (Ikuta et al. 2016).

The primary sources of data available to assess communities' customary dependence on caribou for the purposes of an ANILCA Section 804 user prioritization include ADF&G Division of Subsistence household harvest surveys. Harvest reports from State and Federal hunts may also provide useful insight but are not considered in this analysis because they are not currently available for all communities and hunt opportunities. Household harvest data are particularly relevant to consider because they provide data

not only on harvest, but also on the use and sharing of a resource and the relative contribution of that resource to a community's overall subsistence harvest.

However, household harvest data are limited in some ways. Periodic surveys provide only a snapshot of a community's subsistence practices, and some communities have never been surveyed. Additionally, these data may not capture how a community's use of caribou varies due to caribou population dynamics, migration patterns, weather, and changes in hunting regulations. Importantly, these data do not provide information about use of caribou in a specific area, but overall use of caribou regardless of hunt area. Given these factors, community harvest data should be considered an important but incomplete source of data regarding a community's customary dependence on caribou.

Subsistence harvest surveys in communities whose residents are federally qualified for the proposed hunt span from 1973 to 2023 (**Appendix 2**). Of the 61 federally qualified communities, 45 have been surveyed at least once. Sixteen communities, including Goodnews Bay and Platinum, have either never been surveyed or have been surveyed but were not asked to provide information about their use of caribou (**Appendix 2**). To evaluate dependence on caribou, this analysis considered communities individually and by geographic region. Geographic regions include Norton Sound (i.e., Stebbins and St. Michael), Yukon River drainage, Kuskokwim River drainage, the proposed hunt area (i.e., Togiak and Twin Hills), Nushagak Peninsula and River drainage, and the Alaska Peninsula (**Table 2**). Of note, most surveyed communities in the Yukon and Kuskokwim River drainages were surveyed after the MCH began declining. In contrast, earlier data is available from communities in other regions.

Based on household use of caribou, Togiak and Twin Hills demonstrated the greatest reliance on caribou (82% of households, **Table 3**). The next most reliant on caribou were communities within the Alaska Peninsula region (78% of households), followed by communities on the Nushagak Peninsula and River drainage (70% of households), communities in the Kuskokwim River drainage (47% of households), Norton Sound communities (29% of households), and Yukon River drainage communities (7% of households) (**Table 3**). Based per person harvest of caribou, communities within the Alaska Peninsula area demonstrate the greatest reliance on caribou (59 lbs./person), followed by the Nushagak Peninsula and River drainage communities (47 lbs./person), surveyed communities in the proposed hunt area (31 lbs./person), communities within the Kuskokwim River drainage (22 lbs./person), and Norton Sound communities (5 lbs./person). Yukon River drainage communities demonstrated the lowest reliance (2 lbs./person) (**Table 3**).

When considering communities individually, seventeen communities demonstrate high dependence on caribou, as evidenced by an average[2] of ≥70% of households using caribou. These communities include: Igiugig, Levelock, New Stuyahok, Akiachak, Ekwok, Newhalen, Oscarville, Twin Hills, Koliganek, Kokhanok, Kwethluk, Lime Village, Napaskiak, Iliamna, Akiak, Togiak, and Napakiak (**Table 2**). Notably, no Yukon River drainage communities met this criterion. Eleven communities located predominantly in the Kuskokwim River drainage and Nushagak Peninsula / River drainage areas demonstrate moderate dependence on caribou, as evidenced by an average of 40-70% of households using

[2] For analyses of household harvest data at the community level, averages were calculated based on all survey years. For communities with only one survey year available, that data was used in lieu of an average.

caribou. These communities include Manokotak, Tuluksak, Clark's Point, Quinhagak, Aleknagik, Port Alsworth, Eek, Nondalton, Bethel, St. Michael, and Stony River (**Table 2**). Communities that demonstrate lesser dependence on caribou (i.e., <40% of households using caribou) include Pedro Bay, Dillingham, Upper Kalskag, Lower Kalskag, Scammon Bay, Tuntutuliak, Stebbins, Kotlik, Russian Mission, Emmonak, Marshall, Pilot Station, Mountain Village, Alakanuk, Chevak, Hooper Bay, and Nunam Iqua (**Table 2**). These communities are predominantly in the Yukon River drainage area.

Based on average harvests of ≥80 lbs. of caribou per person, six communities demonstrate high dependence on caribou. These communities include Lime Village, Igiugig, Koliganek, Levelock, Akiachak, New Stuyahok (**Table 2**). Based on average harvests of 20-80 lbs. of caribou per person, twelve communities demonstrate moderate dependence on caribou. These communities include New Halen, Iliamna, Ekwok, Nondalton, Quinhagak, Clark's Point, Kokhanok, Aleknagik, Twin Hills, Togiak, Manokotak, and Oscarville (**Table 2**). Communities with an average caribou harvest of < 20 lbs. per person include Napakiak, Akiak, Stony River, Napaskiak, Eek, Dillingham, Pedro Bay, St. Michael's, Kwethluk, Nunam Iqua, Bethel, Upper Kalskag, Tuluksak, Port Alsworth, Lower Kalskag, Tuntutuliak, Kotlik, Stebbins, Marshall, Scammon Bay, Russian Mission, Pilot Station, Alakanuk, Emmonak, Mountain Village, Chevak, and Hooper Bay (**Table 2**).

The relative contribution (in pounds) of caribou compared to other subsistence foods varied across communities and across years, ranging from 0% in years where caribou were not harvested to a maximum of 27.6% in Igiugig in 1992. However, this data is somewhat limited as it is not available for all survey years (**Appendix 2**). For the years this data is available, caribou comprised an average of 11.4% of total subsistence harvest in Togiak and Twin Hills. This was higher than the average relative contribution of caribou in Nushagak River drainage / Peninsula communities (9.4%), Alaska Peninsula communities (8.5%), Kuskokwim River drainage communities (4.4%), Norton Sound communities (1.25%), or Yukon River drainage communities (0.27%).

In addition to caribou use and harvest metrics, data on hunting and harvesting areas also provide relevant information to consider for this proposal. Hunters in this region often search for caribou in a wide area surrounding their communities (e.g., Krieg et al. 1996; Krieg et al. 1998; Holen et al. 2011, OSM 2018), because caribou populations and migration patterns regularly fluctuate (Behnke 2000, Gunn 2003). TEK maps produced by Van Lanen et al. (2018) demonstrate that residents in the region have been hunting caribou in the Cape Pierce / Cape Newenham area since at least the 1960s, with year-round hunting in this area occurring beginning in the 1990s. However, these data are not specific to individual communities.

Other subsistence studies have found that residents of Togiak historically hunted caribou along the Togiak River drainage, Goodnews River, the coastline south of Togiak to Osviak, corridors to the Nushagak Peninsula, and the Nushagak, Aleknagik, and Mulchatna Rivers, sometimes giving seal oil to the households that helped them hunt in more distant areas (Krieg et al. 2007, Coiley-Kenner et al. 2003). However, this travel became less necessary as caribou became more available closer to Togiak (Krieg et al. 2007). For instance, Fall et al. (2012) documented that Togiak residents hunted caribou along the Togiak River corridor and to the west of the community as far as Goodnews Bay. Similarly, residents of

Twin Hills reported that from 1980-2000, they hunted caribou within the Togiak River drainage and along the Goodnews, Nushagak, and Kvichak Rivers (Coiley-Kenner et al. 2003).

In the mid-1990s, residents of Quinhagak hunted for caribou in the upper Kanektok River (Rearden and Fienup-Riordan 2013). In 2013, caribou hunting occurred in the areas immediately around and north of Quinhagak and in nearby mountains to the east, though overall subsistence activities included extensive travel across the Yukon-Kuskokwim Delta, including in the vicinity of Goodnews Bay (Ikuta et al. 2016).

Residents of Manokotak reported relying on a more extensive caribou hunting area from 1980-2000, extending from the Kulukak River in the west, northeast to the Newhalen River, up the Nushagak and Mulchatna Rivers, south past Clark's Point, and on the Nushagak Peninsula (Coiley-Kenner et al. 2003). However, in 2001-2002, residents of Manokotak hunted for caribou exclusively in the range of the NPCH (Holen et al. 2005, Coiley-Kenner et al. 2003). During this same year, other residents of Units 17B hunted completely within the Nushagak River watershed (Holen et al. 2005).

Although subsistence harvests often focus on easily accessible areas, hunters from some communities will travel long distances to hunt caribou where they are available. For instance, in 2013, residents of Scammon Bay and Pilot Station traveled southeast towards Bethel, Kwethluk, and Napaskiak to hunt for caribou along the Kwethluk River (Ikuta et al. 2016). Residents of Eek and Tuntutuliak, meanwhile, hunted primarily along the Emmonak and Eek Rivers (Ikuta et al. 2016). Similarly, in 2005, residents of New Stuyahok hunted caribou in an extensive area that encompassed portions of the Mulchatna, Nuyakuk, and Nushagak Rivers, and residents of Kokhanok hunted caribou on the western shores of Iliamna Lake as far as the Kaskanak Flats and north towards Lake Clark National Park, and into Katmai National Park and Preserve (Krieg et al. 2009). In contrast, residents of Koliganek reported hunting caribou primarily in accessible areas along the Nushagak River in this same year (Krieg et al. 2009).

Local residency

The communities of Togiak, Twin Hills, Goodnews Bay, and Platinum are the closest to the proposed hunt area and have direct access to the caribou population identified in the Cape Pierce / Cape Newenham area (**Map 1**). Quinhagak is further north and west and Manokotak is further east, but both of these communities are somewhat proximate to the proposed hunt area (**Map 1**) and have historical and cultural ties with the community of Togiak and Twin Hills (BBRAC 1996). The next most proximate to the proposed hunt area includes the remaining communities within the Kuskokwim River drainage and communities within the Nushagak Peninsula / River drainage (**Map 1, Table 2**). Eligible communities that are farthest from the proposed hunt area include Kuskokwim River drainage communities in Units 19E (Stony River and Lime Village), Unit 18 communities within the Yukon River drainage, the communities of Stebbins and St. Michael, and communities in Unit 9B (**Map 1, Table 2**).

Availability of other resources

Residents of Unit 9B and Unit17 are federally qualified to hunt caribou in the proposed hunt area, but they also have access to other Federal caribou hunting opportunities Units 9 and 17 (**Table 4)**. However,

other than the NPCH hunt opportunity in portions of Units 17A and 17C, these opportunities are all may-be-announced hunts.

Beyond caribou, moose have become more abundant in the region as willow habitat expands, and in some cases has replaced caribou as the top harvested ungulate by Bristol Bay and Yukon-Kuskokwim Delta communities (Van Lanen et al. 2018; Fall et al. 2006; Kari 1983; Charnley 1983). Both State and Federal hunts provide important access to moose hunting opportunities. Under current Federal subsistence regulations, residents of Unit 9B are federally qualified to harvest moose in Units 9A, 9B, 9C, and 9E, with both fall and winter hunt opportunities. Residents of Unit 17 are federally qualified to harvest moose throughout Unit 17. Additionally, residents of some Unit 18 communities (Goodnews Bay, Kwethluk, Platinum, Akiachak, and Akiak) and Unit 9 communities (Levelock and Nondalton), are federally qualified to harvest moose in portions of Unit 17. There are both fall and winter moose hunting opportunities in Unit 17. Residents of Unit 18, Upper Kalskag, and Lower Kalskag are federally qualified to harvest moose throughout Unit 18. Residents of St. Michael and Stebbins are also federally qualified to harvest moose in a portion of Unit 18. Current Federal moose hunting opportunities in Unit 18 occur during the fall season and may-be-announced winter seasons.

Access to other, non-wild foods may also be considered for determining ANILCA §804 user prioritization. Communities eligible to participate in the proposed hunt are generally all remote and have limited road systems. Dillingham and Bethel are both larger communities that function as hubs for transportation, healthcare, and trade. Residents of these communities likely have relatively greater access to store-bought foods than residents of smaller eligible communities.

Conclusion

The proponent requests that residents of Togiak, Twin Hills, Goodnews Bay, and Platinum be prioritized for the proposed Federal hunt opportunity. Based on available data, there is evidence to support this request. Households in Togiak and Twin Hills demonstrate high use of caribou and moderate per person harvest of caribou. Additionally, caribou have comprised a larger proportion of subsistence harvests than in some other communities. Residents of these communities and of Goodnews Bay and Platinum have historically hunted in the proposed hunt areas. These communities are in closest proximity to the proposed hunt and have limited access to other caribou hunt opportunities and non-subsistence resources.

Residents of Quinhagak and Manokotak may also meet the criteria for prioritization. These communities demonstrate moderate dependence on caribou, are the next most proximate to the proposed hunt area, and have hunted for caribou near the proposed hunt area. Additionally, these communities have limited access to other caribou hunt opportunities and non-subsistence resources.

Table 2. Communities whose residents have a customary and traditional use determination (C&T) for those portions of the proposed hunt within Unit 17 and/or Unit 18, 2025 population estimates, and household (HH) and per person use of caribou in those communities. Bolded communities are those the proponent requests be prioritized for the proposed hunt. N/A indicates that community has never been surveyed by ADF&G Division of Subsistence. Dashes indicate that metric was not recorded in available household subsistence surveys.

Area	Community	Unit	Unit 17 C&T	Unit 18 C&T	2025 Population Estimate[1]	Avg. % HH Using Caribou[2]	Avg. Lbs. Harvested / Person[2]
Norton Sound	Stebbins	22A		✓	655	16.8	2.7
	St. Michael	22A		✓	444	48.0	10.6
Yukon Drainage	Alakanuk	18		✓	721	2.4	0.4
	Chevak	18		✓	877	2.2	0.0
	Emmonak	18		✓	852	7.3	0.0
	Hooper Bay	18		✓	1,286	0	0
	Kotlik	18		✓	640	11.3	2.9
	Marshall	18		✓	464	6.5	2.1
	Mountain Village	18		✓	591	6.4	0
	Nunam Iqua	18		✓	229	-	9.5
	Pilot Station	18		✓	634	6.4	0.6
	Scammon Bay	18		✓	611	19.8	2.1
	St. Mary's	18		✓	523	N/A	N/A
	Russian Mission	18		✓	410	10.9	1.8
Kuskokwim Drainage	Akiachak	18		✓	724	95.1	85.9
	Akiak	18		✓	492	77.8	18.6
	Atmautluak	18		✓	371	N/A	N/A
	Bethel	18		✓	5,948	54.7	9.0
	Chefornak	18		✓	524	N/A	N/A
	Eek	18	✓	✓	410	60.9	17.5
	Kasigluk	18		✓	661	N/A	N/A
	Kipnuk[3]	18		✓	724	N/A	N/A
	Kongiganak	18		✓	526	N/A	N/A
	Kwethluk	18		✓	823	87.1	10.4
	Kwigillingok[3]	18		✓	356	N/A	N/A
	Lime Village	19E	✓		13	85.7	158.8
	Lower Kalskag	19		✓	235	20.1	6.3
	Mertarvik	18		✓	267	N/A	N/A
	Mekoryuk	18		✓	195	N/A	N/A
	Napakiak	18	✓	✓	321	75.0	19.8
	Napaskiak	18		✓	501	85.7	17.7
	Newtok	18		✓	0	N/A	N/A
	Nightmute	18		✓	292	N/A	N/A
	Nunapitchuk	18		✓	567	N/A	N/A
	Oscarville	18		✓	75	91.7	21.7
	Quinhagak	18	✓	✓	791	65.1	42.1

Area	Community	Unit	Unit 17 C&T	Unit 18 C&T	2025 Population Estimate[1]	Avg. % HH Using Caribou[2]	Avg. Lbs. Harvested / Person[2]
	Stony River	19E	✓		62	46.9	17.8
	Toksook Bay	18		✓	628	N/A	N/A
	Tuluksak	18		✓	486	67.6	8.3
	Tuntutuliak	18	✓	✓	505	19.4	3.9
	Tununak	18		✓	374	N/A	N/A
	Upper Kalskag	19		✓	192	30.9	8.4
Proposed hunt area	**Goodnews Bay**	**18**	✓	✓	**243**	**N/A**	**N/A**
	Platinum	**18**	✓	✓	**62**	**N/A**	**N/A**
	Togiak	**17A**	✓	✓	**718**	**76.6**	**28.3**
	Twin Hills	**17A**	✓	✓	**106**	**91.7**	**35.1**
Nushagak Peninsula & Drainage	Aleknagik	17C	✓		210	61.9	35.4
	Clark's Point	17C	✓		55	66.2	42.0
	Dillingham	17C	✓		2,059	32.9	13.3
	Ekwok	17C	✓		106	95.0	60.1
	Koliganek	17B	✓		183	90.4	105.8
	Manokotak	17C	✓	✓	467	69.0	22.0
	New Stuyahok	17C	✓		454	95.9	83.7
Alaska Peninsula	Igiugig	9B	✓		66	100.0	108.6
	Iliamna	9B	✓		110	82.9	63.6
	Kokhanok	9B	✓		136	90.3	40.6
	Levelock	9B	✓		69	100.0	105.6
	Newhalen	9B	✓		163	55.7	76.6
	Nondalton	9B	✓		121	94.0	55.8
	Pedro Bay	9B	✓		40	34.2	13.1
	Port Alsworth	9B	✓		168	61.7	7.3
Total Eligible		**-**		**-**	**31,341**		
Total (Proposed Prioritized)					**1,129**		

[1]ADLWD 2026

[2]ADF&G 2026b

[3]Currently evacuated due to impacts of Typhoon Halong.

Table 3. Average percentage of surveyed households (HH) harvesting caribou and estimated pounds of caribou harvested per person by communities eligible to participate in the proposed hunt, based on household subsistence surveys conducted between 1973 – 2023 (ADF&G 2026b).

Area	% HH Using	Lbs. / Person
Norton Sound	29	5
Yukon River Drainage	7	2
Kuskokwim River Drainage	47	22
Proposed Hunt Area	82	31
Nushagak Peninsula & River Drainage	70	47
Alaska Peninsula	78	59

Table 4. Federal caribou hunting opportunities in Unit 9 and Unit 17 and federally qualified subsistence users (FQSUs) who are eligible to hunt under these opportunities.

Harvest Opportunity	Open Season	FQSUs
Unit 9A- up to 2 caribou by State registration permit	Aug. 1 – Mar. 15, may be announced	Residents of Units 9B, 9C, and 17
Unit 9B—up to 2 caribou by State registration permit	Aug. 1 – Mar. 31, may be announced	Residents of Units 9B, 9C, and 17
Unit 9C, that portion within the Alaganak River drainage excluding Katmai National Preserve—up to 2 caribou by State registration permit	Aug. 1 – Mar. 15, may be announced	Residents of Units 9B, 9C, 17, and Egegik
Unit 9C, that portion within the Alaganak River drainage excluding Katmai National Preserve—up to 2 caribou by State registration permit *Open only to residents of Igiugig and Kokhanok*	Aug. 1 – Sept. 30 or Nov. 1 – Mar. 31, may be announced	Residents of Units 9B, 9C, 17, and Egegik
Unit 9C, that portion draining into the Naknek River from the north, and Graveyard Creek and Coffee Creek—up to 2 caribou by State registration permit	Aug. 1 – Mar. 15, may be announced	Residents of Units 9B, 9C, 17, and Egegik
Unit 17A, all drainages west of Right Hand Point—up to 2 caribou by State registration permit	Aug. 1 and Mar. 31, may be announced between	*Residents of Units 9B, 9C, 9E, 17, Akiachak, Akiak, Eek, Goodnews Bay, Kwethluk, Lime Village, Napakiak, Platinum, Quinhagak, Stony River, Tuluksak, and Tuntutuliak

Harvest Opportunity	Open Season	FQSUs
Unit 17A and 17C, that portion of 17A east of the Ungalikthluk River and South of the Buchia Ridge, and within the lower Kulukak River drainage south of Buchia Ridge and within the Kanik River drainage downstream of the Tithe Creek, that portion of 17C south of the Igushik River and south of and including the Tuklung River drainage—up to 5 caribou by Federal registration permit (FC1702) *Closed to non-federally qualified users unless population estimate exceeds 900 caribou.*	Aug. 1 – Mar. 31	Residents of Units 9B, 9C, 9E, 17, Lime Village, and Stony River
Unit 17A remainder and 17C remainder—Selected drainages, a harvest limit of up to 2 caribou by State registration permit will be determined at the time the season is announced.	Season may be announced between Aug. 1 – Mar. 31	Residents of Units 9B, 9C, 9E, 17, Lime Village, and Stony River
Units 17B and that portion of Unit 17C east of the Wood River and Wood River Lakes—2 caribou by State registration permit.	Season may be announced between Aug. 1 – Mar. 31	*Residents of Units 9B, 9C, 9E, 17, Kwethluk, Lime Village, and Stony River

*Multiple C&T areas overlap with portions of this hunt area. Not all FQSUs are eligible to hunt in the entire hunt area.

Alternative(s) Considered

Expand the pool of eligible users: The Board may wish to consider expanding the pool of prioritized federally qualified subsistence users beyond those proposed. In particular, residents of Quinhagak and Manokotak demonstrate dependence on caribou as a mainstay of livelihood and are somewhat proximate to the proposed hunt area. Alternatively, the Board may wish to prioritize residents of the nine communities who are federally qualified to harvest caribou in both the Unit 17 and Unit 18 portions of the proposed hunt area, which would provide greater access to caribou harvest opportunities for federally qualified subsistence users. However, it is unclear whether these communities have reasonable access to the proposed hunt area, and additional input from the Council and the public on this alternative would be warranted.

Delegate authority to administer hunt: The Board may wish to consider delegating authority to the Togiak NWR to administer this hunt, including setting an annual harvest quota, closing the season, setting sex restrictions, defining harvest zones, determining the number of permits to issue annually, and determining the number of permits available by community (**Appendix 3**). Delegating this authority would allow for

more effective harvest management of the caribou population by enabling the manager to ensure that harvest is sustainable in response to annual herd status, hunt conditions, and harvest pressure. It would also allow for equitable permit distribution to eligible communities. Togiak NWR indicated administration of the Nushagak caribou hunt is working well, and support modeling the Cape Pierce hunt after the Nushagak caribou hunt (Cawlfied 2026, pers. comm.).

Establish a Federal Permit: The Board likely should require a Federal registration permit for this hunt. Currently, there are no State caribou hunting opportunities in the proposed area, so no State permits are being issued. Requiring a Federal registration permit will ensure that permits can be issued and harvest can be monitored.

Limit to bulls-only: Another alternative considered was to change the harvest limit to bulls-only. Cow survival can be the primary factor affecting herd trajectory (Prichard 2009), so take of cow caribou may curtail the growth of this herd. Distinguishing bulls from cows could require hunters to spend much more time to verify sex before taking a shot. Delegating authority to the in-season manager for this determination to be made on annual basis depending on harvest pressure, herd status, and hunt conditions provides more management flexibility. Delegating this authority may also provide more subsistence opportunity in the event that there are sufficient bulls, but not cows, available for harvest. If this authority is not delegated and there are conservation concerns for the population, the hunt may otherwise need to be closed.

Align with proposed State hunt: Another alternative considered was to align this proposed Federal hunt with the State hunt proposed by Proposal 55. This could reduce regulatory complexity and reduce the need for users to differentiate land status. However, the State proposal only covers Unit 18 since Unit 17 is part of a different BOG cycle. Additionally, the outcome of Proposal 55 is uncertain and will not be known until late January 2027, just before the Board considers WSA26-05 in early February 2027. If a State hunt is established, it will not be effective until the 2027/28 regulatory year, while this request would be effective during the 2026/27 regulatory year.

Discussion and Effects

Adopting this Special Action Request as proposed would establish a new Federal caribou hunt opportunity on Federal public lands in the southwestern portions of Units 17A and 18 for the 2026-2028 regulatory cycle. However, this opportunity would be closed to all users except residents of Togiak, Twin Hills, Goodnews Bay, and Platinum via §804 prioritization. Caribou hunting has been closed in this area since 2021 due to declines in the Mulchatna Caribou Herd population. As such, adopting this proposal would provide increased opportunity for residents of prioritized communities to an important subsistence resource. Harvest pressure for the proposed hunt is likely to be low given the limited number of communities whose residents would potentially be eligible to participate in this hunt.

As submitted, this request would allow for the harvest of any caribou during March. Harvest of cow caribou may curtail growth of this herd, potentially causing conservation concerns. Historically, most of the Nushagak caribou harvest (~68%) has occurred during March due to improved hunter access to the herd via snowmachine, and harvest is greatly dependent on snow conditions affecting access (Aderman

and Lowe 2012, Aderman 2023, pers. comm). Access to and harvest of the Cape Pierce herd could reasonably be expected to be similar. A March hunt provides longer daylight hours, and depending on the winter, good access to the hunt area via snowmachine and safer river crossings. Additionally, as no permit would be required for this hunt, Federal hunters would use a State harvest ticket. This would make tracking harvest difficult, which is important for a new hunt on a small herd.

Adopting WSA26-05 as submitted would misalign State and Federal regulations, increasing regulatory complexity. While State caribou hunts are currently closed in this area, adoption of Proposal 55 would open a State hunt the southwestern portion of Unit 18 for the 2027/28 regulatory year. However, the Federal lands closure to non-federally qualified users implemented by WSA26-05 would curtail opportunity for anyone hunting under State regulations in this area.

If adopted, these regulations would be in place through the 2028 regulatory year. A formal regulatory proposal would need to be submitted during the next Federal wildlife regulatory cycle in early 2027 to request the Board establish this opportunity in codified regulations.

OSM PRELIMINARY CONCLUSION

Support Temporary Special Action Request WP26-05 **with modification** to require a Federal registration permit and to delegate authority to the Togiak NWR manager to set an annual harvest quota, close the season, set sex restrictions, define harvest zones, determine the number of permits to issue annually, and determine the number of permits available by community (**Appendix 3**).

The draft regulations read:

Unit 17—Caribou

*Unit 17A, all drainages west of Right Hand Point**, and east of the Matogak River**—up to 2 caribou by State registration permit*	*Season may be announced between Aug. 1 – Mar. 31*
Unit 17A, west of the Matogak River—1 caribou by Federal registration permit	***Mar. 1 – 31***

Federal public lands are closed to the harvest of caribou except by residents of Togiak, Twin Hills, Goodnews Bay, and Platinum hunting under this part for the 2026/27 and 2027/28 regulatory years.

Unit 18—Caribou

*Unit 18, that portion to the east and south of the Kuskokwim River**, and north of Goodnews Bay and north of the South Fork Goodnews River**—up to 2 caribou by State registration permit*	*Season may be announced between Aug. 1 – Mar. 15*
Unit 18, south of Goodnews Bay and south of South Fork Goodnews River—1 caribou by Federal registration permit	***Mar. 1 – 31***

Federal public lands are closed to the harvest of caribou except by residents of Togiak, Twin Hills, Goodnews Bay, and Platinum hunting under this part for the 2026/27 and 2027/28 regulatory years.

Justification

Caribou hunting opportunities have been very limited in this region since 2019 due to declines in the MCH, and only recently is there sufficient population data to make informed management decisions regarding the Cape Pierce caribou. Caribou are a critical subsistence resource in the region, and available evidence supports prioritization of Togiak, Twin Hills, Goodnews Bay, and Platinum given the small size of the caribou population in the proposed hunt area. Adopting temporary regulations to permit hunting of caribou in the Cape Pierce area of Units 17A and 18 would provide opportunity for the continuation of subsistence uses of caribou by residents of these communities while also balancing conservation needs. Conservation concerns are mitigated by delegating authority to the in-season to administer the hunt and requiring a Federal permit to track harvests.

Extensive Traditional Ecological Knowledge and long-term monitoring data indicate that caribou have been present in the Cape Pierce / Cape Newenham area since at least the early 1990s, and more recent monitoring data indicates these caribou appear to be separate from the MCH. The range of the MCH has contracted and shifted north, and there are now several smaller groups of caribou throughout the larger Mulchatna range. In the past, the Board adopted Federal subsistence hunts for specific, smaller caribou herds as caribou migrated into new areas, with corresponding customary and traditional use determinations or ANILCA §804 user prioritizations. Given the fluctuations in caribou populations in this region over both the short and long term, it is appropriate for the Board to continue to establish and modify Federal subsistence hunting opportunities in relation to these changes to keep up with these fluctuations.

Available data supports prioritizing residents of Togiak, Twin Hills, Goodnews Bay, and Platinum for the proposed hunt. Residents of Togiak and Twin Hills demonstrate reliance on caribou as a mainstay of livelihood, are in the closest proximity to the proposed hunt area, and they also have limited access to non-subsistence foods. Both these communities are federally qualified to harvest from the NPCH, which is an opportunity not available to some other communities that could be eligible to participate in this hunt.

However, changing weather conditions have made it difficult to travel to the Nushagak Peninsula Caribou Herd hunt area in recent years, so feasible access to this opportunity may be limited.

While there is little quantitative data available regarding the harvest practices and dependence on caribou by residents of Goodnews Bay and Platinum, these communities are closest to the proposed hunt area and have relatively limited access to non-subsistence foods. Qualitative data and discussions at Council meetings suggests residents of these communities have customarily harvested caribou in the proposed hunt area when they have been available. Additionally, these communities have limited access to other Federal caribou hunting opportunities as they are not federally qualified to harvest from the NPCH in Unit 17, remainder. OSM hopes to receive additional information on the caribou harvest practices of these communities at the upcoming public hearing on this proposal.

While some other eligible communities appear to demonstrate greater reliance on caribou as a mainstay of livelihood, these communities are relatively far from the proposed hunt area and in some cases are eligible to harvest caribou from either the NPCH and/or Northern Alaska Peninsula Caribou Herd.

The population of caribou in the proposed hunt area appears to be small but healthy and growing, and the limited scope of the proposed hunt is unlikely to pose conservation concerns. Adopting this proposal with modification to delegate authority to an in-season manager provides management flexibility to address conservation concerns should they arise. Requiring a Federal registration permit will ensure adequate permitting and harvest monitoring.

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APPENDIX 1
CUSTOMARY AND TRADITIONAL USE DETERMINATIONS REGUALTORY HISTORY

Table A1-1. Changes in Federal caribou Customary and Traditional Use Determinations in Unit 17. Bold text indicates changes in regulations for the given year.

Year Implemented	Determination Area	Eligible Users
1990-1991	Unit 17	Residents of GMU 9B and 17 and residents of Lime Village and Stony River
	Unit 17A, B – those portions north and west of a line beginning from the GMU 18 boundary at the northwest end of Nenevok Lake to the southern point of upper Togiak Lake, and northeast to the northern point of Nuyakuk Lake, northeast to the point where the GMU 17 boundary intersects the Shotgun Hills	Residents of Kwethluk
1999-2000	Unit 17	Residents of Units 9B and 17 and residents of Lime Village and Stony River
	Unit 17A that portion west of the Izavieknik River, Upper Togiak Lake, Togiak Lake, and the main course of the Togiak River	**Residents of Goodnews Bay, Platinum, Quinhagak, Eek, Tuntutuliak, and Napakiak**
	Unit 17A, B – those portions north and west of a line beginning from the GMU 18 boundary at the northwest end of Nenevok Lake to the southern point of upper Togiak Lake, and northeast to the northern point of Nuyakuk Lake, northeast to the point where the GMU 17 boundary intersects the Shotgun Hills	Residents of Kwethluk
	Unit 17B that portion of Togiak National Wildlife Refuge within 17B	**Residents of Bethel, Goodnews Bay, Platinum, Quinhagak, Eek, Tuntutuliak, and Napakiak**
2000-2001	Unit 17	Residents of Units 9B and 17 and residents of Lime Village and Stony River

Year Implemented	Determination Area	Eligible Users
	Unit 17A that portion west of the Izavieknik River, Upper Togiak Lake, Togiak Lake, and the main course of the Togiak River	Residents of Goodnews Bay, Platinum, Quinhagak, Eek, Tuntutuliak, and Napakiak
	Unit 17A that portion north of Togiak Lake that includes Izavieknik River drainages	**Residents of Akiak, Akiachak, and Tuluksak**
	Unit 17A, B – those portions north and west of a line beginning from the GMU 18 boundary at the northwest end of Nenevok Lake to the southern point of upper Togiak Lake, and northeast to the northern point of Nuyakuk Lake, northeast to the point where the GMU 17 boundary intersects the Shotgun Hills	Residents of Kwethluk
	Unit 17B that portion of Togiak National Wildlife Refuge within 17B	Residents of Bethel, Goodnews Bay, Platinum, Quinhagak, Eek, **Akiak, Akiachak, Tuluksak,** Tuntutuliak, and Napakiak
2007	Unit 17 **remainder**	Residents of Units 9B, 17, Lime Village, and Stony River
	Unit 17A that portion west of the Izavieknik River, Upper Togiak Lake, Togiak Lake, and the main course of the Togiak River	Residents of Goodnews Bay, Platinum, Quinhagak, Eek, Tuntutuliak, and Napakiak
	Unit 17A that portion north of Togiak Lake that includes Izavieknik River drainages	Residents of Akiak, Akiachak, and Tuluksak
	Unit 17A, B – those portions north and west of a line beginning from the GMU 18 boundary at the northwest end of Nenevok Lake to the southern point of upper Togiak Lake, and northeast to the northern point of Nuyakuk Lake, northeast to the point where the GMU 17 boundary intersects the Shotgun Hills	Residents of Kwethluk
	Unit 17B that portion of Togiak National Wildlife Refuge within 17B	Residents of Bethel, Goodnews Bay, Platinum, Quinhagak, Eek, Akiak,

Year Implemented	Determination Area	Eligible Users
		Akiachak, Tuluksak, Tuntutuliak, and Napakiak
2016-2017	Unit 17 remainder	Residents of Units 9B and 17 and residents of Lime Village and Stony River
	Unit 17A that portion west of the Izavieknik River, Upper Togiak Lake, Togiak Lake, and the main course of the Togiak River	Residents of **Unit 9B, Unit 17**, Eek, Goodnews Bay, **Lime Village,** Napakiak, Platinum, Quinhagak, **Stony River,** Tuntutuliak, and
	Unit 17A that portion north of Togiak Lake that includes Izavieknik River drainages	Residents of **Units 9B, 17,** Akiak, Akiachak, **Lime Village, Stony River,** and Tuluksak
	Unit 17A, B – those portions north and west of a line beginning from the GMU 18 boundary at the northwest end of Nenevok Lake to the southern point of upper Togiak Lake, and northeast to the northern point of Nuyakuk Lake, northeast to the point where the GMU 17 boundary intersects the Shotgun Hills	Residents of **Units 9B, 17,** Kwethluk, **Lime Village, and Stony River**
	Unit 17B that portion of Togiak National Wildlife Refuge within 17B	Residents of Units **9B, 17,** Akiachak, Akiak, Bethel, Eek, Goodnews Bay, **Lime Village,** Napakiak, Platinum, Quinhagak, **Stony River**, Tuluksak, and Tuntutuliak
2018-2019	Unit 17 remainder	Residents of Units 9B, **9C, 9E**, and 17 and residents of Lime Village and Stony River
	Unit 17A that portion west of the Izavieknik River, Upper Togiak Lake, Togiak Lake, and the main course of the Togiak River	Residents of Units 9B, 17, Lime Village, Stony River, Goodnews Bay, Platinum, Quinhagak, Eek, Tuntutuliak, and Napakiak

Year Implemented	Determination Area	Eligible Users
	Unit 17A that portion north of Togiak Lake that includes Izavieknik River drainages	Residents of Units 9B, 17, Akiak, Akiachak, Lime Village, Stony River, and Tuluksak
	Unit 17A, B – those portions north and west of a line beginning from the GMU 18 boundary at the northwest end of Nenevok Lake to the southern point of upper Togiak Lake, and northeast to the northern point of Nuyakuk Lake, northeast to the point where the GMU 17 boundary intersects the Shotgun Hills	Residents of Units 9B, 17, Kwethluk, Lime Village, and Stony River
	Unit 17B that portion of Togiak National Wildlife Refuge within 17B	Residents of Units 9B, 17, Lime Village, Bethel, Goodnews Bay, Platinum, Quinhagak, Stony River, Eek, Akiak, Akiachak, Tuntutuliak, Tuluksak, and Napakiak

Table A1-2. Changes in Federal Customary and Traditional Use Determinations for caribou in Unit 18. Bold text indicates changes in regulations for the given year.

Year Implemented	Determination Area	Eligible Users
1990-1991	Unit 18	Residents of Kwethluk
1992-1993	**Unit 18 Kilbuck Herd only**	**Residents of Tuluksak, Akiak, Akiachak, Kwethluk, Bethel, Oscarville, Napaskiak, Napakiak, Kasigluk, Atmauthluak, Nunapitchuk, Tuntutuliak, Eek, Quinhagak, Goodnews Bay, Platinum, Togiak, Twin Hills**
	Unit 18 except Kilbuck Herd	**Residents of Kwethluk**
1994 (Temporary	Unit 18 Kilbuck Herd only	Residents of Tuluksak, Akiak, Akiachak, Kwethluk,

Year Implemented	Determination Area	Eligible Users
Special Action)		Bethel, Oscarville, Napaskiak, Napakiak, Kasigluk, Atmauthluak, Nunapitchuk, Tuntutuliak, Eek, Quinhagak, Goodnews Bay, Platinum, Togiak, Twin Hills
	Unit 18 north of the Yukon River	**Residents of Tuluksak, Akiak, Akiachak, Kwethluk, Bethel, Oscarville, Napaskiak, Napakiak, Kasigluk, Atmauthluak, Nunapitchuk, Tuntutuliak, Eek, Quinhagak, Goodnews Bay, Platinum, Togiak, Twin Hills**
	Unit 18 except Kilbuck Herd	Residents of Kwethluk
2000-2001	**Unit 18**	**Residents of Kwethluk, Akiachak, Akiak, Eeek, Goodnews Bay, Mountain Village, Napaskiak, Platinum, Quinhagak, St. Marys, and Tuluksak**
	Unit 18 south of the Yukon River (Kilbuck Herd only)	Residents of Tuluksak, Akiak, Akiachak, Kwethluk, Bethel, Oscarville, Napaskiak, Napakiak, Kasigluk, Atmautluak, Nunapitchuk, Tuntutuliak, Eek, Quinhagak, Goodnews Bay, Platinum, Togiak, and Twin Hills
	Unit 18 north of the Yukon River (except Kilbuck Herd)	Residents of Alakanuk, Andreafsky, Chevak, Emmonak, Hooper Bay, Kotlik, Kwethluk, Marshall, Mountain Village, Pilot Station, Pitka's Point,

Year Implemented	Determination Area	Eligible Users
		Russian Mission, St. Mary's, St. Michael, Scammon Bay, Sheldon Point, and Stebbins
	Unit 18 remainder	Residents of Kwethluk
2002-2003	**Unit 18**	**Residents of Unit 18 and residents of St. Michael, Stebbins, Togiak, Twin Hills, Upper Kalskag, and Manokotak**
2016-2017	Unit 18	Residents of Unit 18 and residents of St. Michael, Stebbins, Togiak, Twin Hills, Upper Kalskag, **Lower Kalskag**[1], and Manokotak

[1]Lower Kalskag was historically located in Unit 18 and therefore was included in earlier determinations for the Unit. The modification made in 2016 re-added Lower Kalskag, now located in Unit 19, to the determination.

APPENDIX 2
HOUSEHOLD CARIBOU HARVEST AND USE BY COMMUNITY

Table A2-1. Household harvest and use of caribou by community of residence, as documented in ADF&G Division of Subsistence surveys (CSIS 2026). N/A indicates that no Division of Subsistence household surveys have been conducted for that community, or that previous surveys conducted in that community did not collect data on caribou harvest and use. Dashes indicate no data was reported for that metric.

Area	Community	Year	Households Using Caribou (%)	Households Harvesting Caribou (%)	Households Giving Caribou (%)	Households Receiving Caribou (%)	# Caribou Harvested	Caribou Harvest Per Person (lbs)	% of Total Harvest that is Caribou
Norton Sound	St. Michael	2003	68	18	16	57	48	15.9	-
		2006	27	2	7	26	17	5.2	2.2
	Stebbins	1980	-	-	-	-	0	0	0
		2002	5	-	-	5	0	0	-
		2006	36	2	13	34	21	4.9	1.0
		2013	9	3	3	6	26	6.1	1.8
Yukon Drainage	Alakanuk	1980	0	0	0	0	0	0	0
		2023	2	1	0	1	4	0.7	0.2
	Chevak	2021	2	0	0	2	0	0	0
	Emmonak	1980	0	0	0	0	0	0	0
		2008	7	0	0.9	7.3	0	0	0
	Hooper Bay	2021	0	0	0	0	0	0	0
	Kotlik	1980	0	7	0	0	8	4.3	0.9
		2023	11	1	1	10	7	1.6	0.4
	Marshall	2010	7	2	2	4	6	2.1	0.5
	Mountain Village	1980	0	0	0	0	0	0	0
		2010	6	0	0	6	0	0	0
	Nunam Iqua	1980	0	14	0	0	7	9.5	0.7
	Pilot Station	2013	6	1	1	5	3	0.6	0.4
	Scammon Bay	2013	20	4	6	16	10	2.1	0.5
	Saint Mary's	N/A							

Area	Community	Year	Households Using Caribou (%)	Households Harvesting Caribou (%)	Households Giving Caribou (%)	Households Receiving Caribou (%)	# Caribou Harvested	Caribou Harvest Per Person (lbs)	% of Total Harvest that is Caribou
	Russian Mission	2011	11	4	4	7	5	1.8	0.6
Kuskokwim Drainage	Akiachak	1998	95	83	65	53	374	85.9	6.5
	Akiak	2010	78	37	33	56	55	18.6	3.0
	Atmautluak	N/A							
	Bethel	2011	55	16	22	41	446	9.4	-
		2012	55	13	15	45	374	8.6	5.2
	Chefornak	N/A							
	Eek	2013	61	27	27	34	47	17.5	7.2
	Kasigluk	N/A							
	Kipnuk	N/A							
	Kongiganak	N/A							
	Kwethluk	1986	-	2	0	28	3	0.6	0.1
		2010	87	39	32	65	111	20.2	5.5
	Kwigillingok	N/A							
	Lime Village	2007	86	43	43	71	28	158.8	17.0
	Lower Kalskag	2003	35	29	21	18	47	20.0	-
		2004	10	5	2	5	7	3.6	-
		2005	13	0	0	13	0	0	-
		2009	22	3	5	19	4	1.6	0.8
	Mertarvik	N/A							
	Mekoryuk	N/A							
	Napakiak	2011	75	32	30	47	45	19.8	4.1
	Napaskiak	2011	86	41	39	52	60	17.7	1.0
	Newtok	N/A							
	Nightmute	N/A							
	Nunapitchuk	N/A							
	Oscarville	2010	92	50	50	42	10	21.7	4.2
	Quinhagak	1982	0	25	0	0	196	62.1	8.1

Area	Community	Year	Households Using Caribou (%)	Households Harvesting Caribou (%)	Households Giving Caribou (%)	Households Receiving Caribou (%)	# Caribou Harvested	Caribou Harvest Per Person (lbs)	% of Total Harvest that is Caribou
		2013	65	29	23	43	125	22.2	7.6
	Stony River	2003	53	29	24	35	14	35.2	-
		2004	60	20	0	40	6	32.5	-
		2005	33	0	0	33	0	0	-
		2009	42	8	0	33	2	3.4	0.6
	Toksook Bay	N/A							
	Tuluksak	2010	68	22	24	52	29	8.3	2.3
	Tuntutuliak	2013	19	8	6	13	12	3.9	1.1
	Tununak	N/A							
	Upper Kalskag	2003	53	35	29	29	42	22.3	-
		2004	30	6	6	24	4	2.8	-
		2005	26	15	9	15	16	7.8	-
		2009	15	2	4	13	1	0.8	0.2
Proposed hunt area	**Goodnews Bay**	**N/A**							
	Platinum	**N/A**							
	Togiak	**1999**	**71**	**47**	**41**	**45**	**178**	**36.6**	**14.9**
		2001	**0**	**0**	**0**	**0**	**106**	**22.6**	**-**
		2008	**83**	**30**	**36**	**65**	**136**	**25.5**	**8.4**
	Twin Hills	**1999**	**92**	**75**	**67**	**67**	**25**	**54.2**	**10.9**
		2001	**0**	**0**	**0**	**0**	**8**	**15.9**	**-**
Nushagak Peninsula & Drainage	Aleknagik	1989	84	55	61	61	57	60.5	13.3
		2001	89	47	28	53	48	45.8	-
		2008	13	0	0	13	0	0.0	0.5
	Clark's Point	1989	77	41	47	65	18	48.2	13.3
		2001	86	57	57	43	28	71.2	-
		2008	36	9	9	18	2	6.5	0.5

Area	Community	Year	Households Using Caribou (%)	Households Harvesting Caribou (%)	Households Giving Caribou (%)	Households Receiving Caribou (%)	# Caribou Harvested	Caribou Harvest Per Person (lbs)	% of Total Harvest that is Caribou
	Dillingham	1984	70	22	15	54	379	27.9	11.5
		2001	14	6	7	8	344	21.1	-
		2010	36	5	9	29	63	4.1	2.0
		2021	12	9	5	12	0	0.0	-
	Ekwok	1987	83	62	38	59	57	80.4	10.1
		2001	97	31	16	78	28	39.8	-
	Koliganek	1987	91	74	60	62	186	150.0	18.1
		2001	91	57	44	65	93	75.7	-
		2005	89	61	57	46	91	91.5	10.2
	Manokotak	1985	89	32	46	65	44	21.5	5.6
		1999	88	49	63	65	130	49.3	13.9
		2001	88	42	32	53	68	27.9	-
		2008	49	8	7	44	20	8.1	2.7
		2023	31	6	7	29	12	3.0	1.3
	New Stuyahok	1987	98	82	58	69	253	107.6	15.4
		2001	98	66	63	73	260	79.9	-
		2005	92	59	41	61	178	63.5	16.3
Alaska Peninsula	Igiugig	1983	0	33	0	67	7	15.8	2.6
		1992	100	100	90	70	62	200.0	27.6
		2001	100	91	82	36	23	127.8	-
		2005	100	58	75	83	24	90.8	16.8
	Iliamna	1983	0	20	0	10	16	17.3	4.2
		1991	96	70	65	61	107	164.0	19.3
		2001	76	43	48	57	40	66.2	-
		2004	77	8	23	69	3	7.0	1.5
	Kokhanok	1983	0	5	0	47	1	1.5	0.2
		1992	97	64	64	72	137	118.1	11.7
		2001	94	25	13	88	20	22.1	-

Area	Community	Year	Households Using Caribou (%)	Households Harvesting Caribou (%)	Households Giving Caribou (%)	Households Receiving Caribou (%)	# Caribou Harvested	Caribou Harvest Per Person (lbs)	% of Total Harvest that is Caribou
		2005	80	26	26	63	21	20.5	3.0
	Levelock	1988	100	74	85	85	86	118.0	9.4
		1992	100	77	79	79	86	116.5	13.2
		2001	100	53	41	65	28	67.9	-
		2005	100	64	57	64	27	120.0	22.8
	Nondalton	1973	0	60	0	0	115	111.6	13.9
		1980	0	71	0	0	78	69.4	6.7
		1981	0	68	0	0	81	61.1	8.3
		1983	0	86	0	5	203	108.7	9.3
		2001	94	27	36	91	23	22.8	-
		2004	53	13	29	47	18	16.6	4.6
		2021	21	0	3	21	0	0.0	0
	Newhalen	1983	0	36	0	0	24	28.3	3.7
		1991	100	81	69	77	154	146.5	19.6
		2001	94	65	53	82	71	72.1	-
		2004	88	44	60	68	49	59.4	8.6
	Pedro Bay	1982	0	6	0	0	6	15.0	1.7
		1996	54	15	23	39	15	34.9	8.8
		2001	21	9	9	21	0	0.0	-
		2004	28	6	6	28	1	2.5	0.8
	Port Alsworth	1983	-	23	0	8	6	12.8	3.5
		2001	90	10	20	90	4	5.6	-
		2004	86	9	23	86	6	9.4	7.1
		2021	9	3	3	6	1	1.4	1.2

APPENDIX 3

Refuge Manager
Togiak National Wildlife Refuge
P.O. Box 270 MS 569
Dillingham, Alaska 99576

Dear Refuge Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the manager of the Togiak National Wildlife Refuge to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of a wildlife population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Unit 17A, west of the Matogak River and the portion of Unit 18, south of Goodnews Bay and south of South Fork Goodnews River for the management of caribou on these lands.

It is the intent of the Board that actions related to management of caribou by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), the Office of Subsistence Management (OSM), Bureau of Land Management (BLM) Anchorage Field Office, and the Chair of the affected Federal Subsistence Regional Advisory Council(s) to the extent possible. OSM will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local Tribes, and Alaska Native corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1.Delegation: The manager of the Togiak National Wildlife Refuge is hereby delegated authority to issue emergency or temporary special actions affecting caribou on Federal lands as outlined under the Scope of Delegation. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 43 CFR 51.19.

2.Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 43 CFR 51.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board."

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 43 CFR 51.26:

- Set annual harvest quota
- Set sex restrictions

- Close season
- Define harvest zones
- Set number of permits issued annually
- Determine number of permits available by community

This delegation also permits you to close and reopen Federal public lands to non-subsistence hunting but does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve caribou populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations or adjustments to methods and means of take, shall be directed to the Board.

The Federal public lands subject to this delegated authority are those within Unit 17A, west of the Matogak River and the portion of Unit 18, south of Goodnews Bay and south of South Fork Goodnews River.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until June 30, 2028.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate as a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 43 CFR 51.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected federally qualified subsistence users and non-federally qualified users. Requests not within your delegated authority will be forwarded to the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Consultation Policies (Federal Subsistence Board Government-to-Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).

You will immediately notify the Board through OSM Director and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation

unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 43 CFR 51.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of federally qualified subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. <u>Support Services:</u> Administrative support for regulatory actions will be provided by OSM.

Sincerely,

Anthony Christianson
Chair

Enclosure

cc: Federal Subsistence Board
Office of Subsistence Management
Chair, Bristol Bay Subsistence Regional Advisory Council
Chair, Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Deputy Commissioner, Alaska Department of Fish and Game
Federal Subsistence Liaison, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record