

## Emergency Special Action Request WSA26-09 Federal Subsistence Board Vote

Unit 25D remainder Moose

WSA26-09 requested targeted closure of Federal public lands to moose hunting by non-federally qualified users (NFQUs) along river corridors in Unit 25D remainder, September 10 – 20 in alignment with Wildlife Proposal WP26-75.

The Federal Subsistence Board (Board) **supported WSA26-09** by a vote of 8 in favor, 2 in opposition, and 1 abstaining by email poll on August 31, 2026.

**Table 1.** Tally of Board votes and justification

| FSB Member                                                                | Vote    | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Vote received via email on |
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| USFWS Subsistence Coordinator Klein on behalf of Regional Director Boario | Support | “The FWS supports emergency special action request WSA26-09, which essentially implements the Federal Subsistence Board’s (Board) decision and action in April 2026, which recognized that low moose, low-to-no salmon, and high user conflict were challenging the continuation of subsistence uses in Unit 25D. Due to delays in publishing the federal subsistence wildlife regulatory final rule with the Board’s action from April, it is necessary to support WSA26-09 for the continuation of subsistence—and to close federal public lands along the affected river corridors in Unit 25D. The State season starts Sept. 10, and this needs to be addressed before the season starts. Therefore, WSA26-09 is needed to continue subsistence uses until the new federal subsistence wildlife regulations are published in the federal register.” | 8/31 2:19 pm               |
| Public Member Brower                                                      | Support | “I support the special action WSA26-09”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 8/31 @ 1:22 pm             |

| <b>FSB Member</b>               | <b>Vote</b> | <b>Justification</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Vote received via email on</b> |
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| USFS Regional Forester Buchanan | Oppose      | "I am casting the vote for the US Forest Service and we are opposing the emergency special action request WSA26-09 in agreement with BLM that the available data and information do not suggest that an emergency exists as referenced in 43 CFR 51.19, such that an emergency closure to NFQU is required to 'ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons.'"                                                                                                                                                                                                                                                                                                                                       | 8/31 @ 10:53 am                   |
| Chair Christianson              | Support     | "I support this wildlife special action."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 8/31 @ 12:09 pm                   |
| BIA Regional Director John      | Support     | "BIA supports WSA26-09. This will ensure that the NFQSU closure can be in place until the regulations approved by the Board for WP26-75 can be enacted."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 8/31 @ 1:09 pm                    |
| Public Member Oney              | Support     | "I support WSA26-09"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 8/31 @ 12:35 pm                   |
| Public Member Payenna           | Support     | "I vote in favor"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 8/31 @ 7:46 pm                    |
| BLM State Director Pendergast   | Oppose      | "BLM opposes emergency special action request WSA26-09. Available data and information do not suggest an emergency exists as referenced in 43 CFR 51.19, such that an emergency closure to NFQU is required to 'ensure the continued viability of a fish or wildlife population, to continue subsistence uses, or for public safety reasons.' While Unit 25 D remainder does have low moose population density, and there is a documented conflict amongst user groups in the area, especially along the Yukon River corridor, this request is not time sensitive to the degree that an emergency closure is warranted. Such an emergency closure does not appear to be needed to ensure the continued viability of a fish or wildlife population, to continue subsistence uses, or for public safety." | 8/31 @ 8:56 am                    |

| <b>FSB Member</b>             | <b>Vote</b> | <b>Justification</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Vote received via email on</b> |
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| Public Member Pitka           | Abstain     | "I abstain"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 8/31 @ 12:02 pm                   |
| NPS Regional Director Striker | Support     | "The NPS supports this motion. Although initially opposed for the reasons articulated by the BLM, we were overruled by board majority. We believe it would be awkward at this point not to follow through with the clear board intent and that potential board opposition to this motion would cause unnecessary confusion."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 8/31 @ 4:05 pm                    |
| Public Member Woods           | Support     | "Action taken by the board last April 21st, 2026 closes the area after or mid season when the regulatory year ends. That Area is open right now due to the lack of timing and filing of the new regulations. We vetted and did a full analysis of the state and federal land that is in question? This action will be timely for 2026-2027 hunting seasons for federally qualified subsistence users to be affected? Anything that interferes with rural preference subsistence priority under ANILCA is in competition for resource and stops the success of that priority, anything biologically and interfering with that priority when state land is open and there is a lot of area open and the conflict of users is a statewide issue. I read the closing action taken and Public Member Woods votes to support because of other lands that are accessible to nonqualified subsistence users and agrees with TCC emergency order request 'Due to delays in the Federal subsistence regulations being finalized and published, the Tanana Chiefs Conference is submitting this Wildlife Special Action as an interim measure to implement WP26-75 in Unit 25D remainder ahead of the moose season opening on August 25, 2026.'" | 8/31 @ 11:41 am                   |