

## Emergency Special Action Request WSA26-10 Federal Subsistence Board Vote

### Units 11 & 13 Moose

WSA26-10 requested extension of the 2026 moose season in Units 11 and 13 consistent with Wildlife Proposals WP26-28a and WP26-28b.

The Federal Subsistence Board (Board) unanimously **supported WSA26-10** to extend the Unit 13 moose season to close September 30, and **supported WSA26-10** by a vote of 10 in favor and 1 opposed to establish a may-be-announced moose season in Unit 11 from September 21-30 and to delegate authority to the Wrangell-St. Elias National Park and Preserve superintendent to open/close a season between September 21-30. The vote was conducted by email poll on September 8-9, 2026.

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

| FSB Member                     | Vote    | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Vote received via email on |
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| USFWS Regional Director Boario | Support | "The USFWS votes to support WSA26-10. The Board adopted WP268a (Unit 11 moose) with modification "to establish a may-be-announced moose season in Unit 11 from Sept. 21-30 and to delegate authority to the Wrangell St. Elias National Park (WRST) superintendent to open/close a season between Sept. 21-30 via delegation of authority letter only." WRST has already received their delegation of authority letter and their decision to open/close a season, between Sept. 21-30 will be based on the current moose population and consultation/coordination with others. We recognize the importance of needing to message out to the public as soon as possible in Unit 11 and support this implementation of the Board's decision from April 2026 of a "may be announced" season between the dates of Sept. 21-30. We additionally support extending the hunt in Unit 13 through September 30 based on Board's action in April 2026." | 9/9 @ 10:02 am             |

| <b>FSB Member</b>               | <b>Vote</b>                                 | <b>Justification</b>                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Vote received via email on</b> |
|---------------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Public Member Brower            | Support                                     | "I vote to approve WSA26-10 as justified by Rhonda [Pitka]"                                                                                                                                                                                                                                                                                                                                                                         | 9/8 @ 1:28 pm                     |
| USFS Regional Forester Buchanan | Support                                     | "USFS supports the approval of WSA26-10 for the reasons articulated by BIA Regional Director John."                                                                                                                                                                                                                                                                                                                                 | 9/9 @ 8:11 am                     |
| Chair Christianson              | Support                                     | "I support as justified by Rhonda [Pitka]."                                                                                                                                                                                                                                                                                                                                                                                         | 9/8 @ 11:24 am                    |
| BIA Regional Director John      | Support                                     | "BIA approves WSA26-10, as this action will ensure that WP26-28a and 28b can be implemented in accordance with the Board's previous decision on these proposals during the April 2026 Wildlife Regulatory Meeting. This emergency wildlife special action could allow extension of the subsistence moose season in Units 11 and 13 if approved by the in-season manager, which is consistent with the intents of WP26-28a and 28b." | 9/8 @ 11:40 am                    |
| Public Member Oney              | Support                                     | "I am in support of WSA26-10 as outlined in BIA Jolene John comments."                                                                                                                                                                                                                                                                                                                                                              | 9/8 @ 12:32 pm                    |
| Public Member Payenna           | Support                                     | "In concurrence with comments submitted by the BIA, I approve WSA26-10."                                                                                                                                                                                                                                                                                                                                                            | 9/8 @ 1:13 pm                     |
| BLM State Director Pendergast   | Support with modification (Support Unit 13; | "WSA26-10 contains two requests: (1) to extend the moose season in Unit 13 by 10 days, as was adopted via WP26-28b, and (2) to establish a may-be-announced moose season in Unit 11 (map below) from September 21st to 30th and to delegate authority to the Wrangell St. Elias Superintendent                                                                                                                                      | 9/9 @ 8:16 am                     |

| FSB Member | Vote            | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Vote received via email on |
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|            | Oppose Unit 11) | <p>open and close a season between Sept. 21-30 via delegation of authority letter only, as was adopted with NPS modification via WP28a.</p> <p>BLM's position on each of these requests follows. BLM supports emergency special action request to extend the Unit 13 moose season to September 30. Available data and information suggest that an emergency exists as referenced in 43 CFR 51.19, such that extending the Unit 13 moose season 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." The Board unanimously adopted WP26-28b to extend the Unit 13 moose season by 10 days because it will provide subsistence users with the meaningful opportunity to continue the subsistence uses of moose. The information provided by analysis, the Southcentral Regional Advisory Council, and other subsistence users further demonstrated that the regulatory change was urgent because subsistence users were experiencing difficulties harvesting moose and meeting their subsistence needs.</p> <p>BLM Opposes the request to use an emergency action to establish a may be announced moose season in Unit 11 from September 21st to 30th and to delegate authority to the Wrangell St. Elias Superintendent open and close a season between Sept. 21-30 via delegation of authority letter only. The Board adopted WP26-28a with modifications to provide subsistence users with additional opportunity to harvest moose when the most current data suggests there is a harvestable surplus. However, as referenced in 43 CFR 51.19, the Board only has the authority to implement short-term regulatory changes by emergency special action to "ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons." It would be incongruent with this</p> |                            |

| <b>FSB Member</b>             | <b>Vote</b> | <b>Justification</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Vote received via email on</b> |
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|                               |             | authority for the Board to establish a “may be announced” season by emergency action. I believe this request should only be considered through a regulatory proposal, as it was with WP26-28a, or through a temporary special action.”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                   |
| Public Member Pitka           | Support     | “I support WSA 26-10 for the continuity of subsistence uses. The board recognized the need for an extended season in Units 11 and 13 as warming fall temperatures delay the rut and harvest becomes more difficult during its April regulatory meeting.”                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 9/8 @ 11:22 am                    |
| NPS Regional Director Striker | Support     | “NPS approves WSA26-10 for the reasons articulated by BIA Regional Director John.”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 9/9 @ 8 am                        |
| Public Member Woods           | Support     | “The Board adopted WP26-28a (Unit 11 moose) with modification "to establish a may-be-announced moose season in Unit 11 from Sept. 21-30 and to delegate authority to the Wrangell St. Elias National Park (WRST) superintendent to open/close a season between Sept. 21-30 via delegation of authority letter only." WRST has already received their delegation of authority letter and their decision to open/close a season, between Sept. 21-30 will be based on the current moose population and consultation/coordination with others. We recognize the importance of needing to message out to the public as soon as possible in Unit 11 and support this implementation of the Board’s decision from April 2026.” | 9/9 @ 10:08 am                    |