

Emergency Special Action Request WSA26-12 Federal Subsistence Board Vote

Unit 13 Moose

WSA26-12 requested closure of Bureau of Land Management (BLM lands) in Unit 13 to moose hunting by non-federally qualified users for the 2026 season consistent with Wildlife Proposal WP26-31.

The Federal Subsistence Board (Board) **opposed WSA26-12** by a vote of 2 in favor, 8 opposed, and 1 absent by email poll on September 15, 2026.

Table 1. Tally of Board votes and justification

FSB Member	Vote	Justification	Vote received via email on
USFWS Regional Director Boario	Oppose	“The FWS votes to oppose special action request WSA26-12. While this request is intended to implement the Board’s actions from April 2026, it was submitted during the Unit 13 moose hunting season, which is currently underway. This could cause confusion and conflict in the field. This is unlike previous special actions implementing the Board’s decisions before the beginning of a hunting season. We echo the justification provided by BLM for WSA26-10 in Unit 13: the Board recently supported a 10-day extension for the moose hunt in Unit 13, which will provide additional subsistence opportunity.	09/15/2026 at 12:29 PM
Public Member Brower	Absent	n/a	Not able to respond.
USFS Regional Forester Buchanan	Oppose	“USFS opposes WSA26-12, a request to close Federal public lands in Unit 13 for the remainder of the State moose season, ending September 20, for the same rationale laid out by BLM.”	09/15/2026 at 11:49 AM
Chair Christianson	Support	“As justified during Board action at the April meeting.”	09/15/2026 at 10:46 AM

FSB Member	Vote	Justification	Vote received via email on
BIA Regional Director John	Oppose	“BIA votes to oppose the special action request WSA26-12. This Board approved WP26-31 in April 2026, although a publication delay in the Federal Register has temporarily prevented its enactment in a timely manner. As mentioned, hunters may already be in the field and preparing to travel to the area. Despite awareness of past in-season closures, this emergency closure may have the potential to create confusion and conflict. BIA appreciates the Ahtna Intertribal Resource Commission for looking out for the continued subsistence uses for Unit 13 rural residents.”	09/15/2026 at 3:52 PM
Public Member Oney	Oppose	For the reasons given by BIA.	09/15/2026 at 4:20 PM
Public Member Payenna	Oppose	For the rationale given by Member Woods.	09/15/2026 at 3:55 PM
BLM State Director Pendergast	Oppose	“BLM opposes WSA26-12, a request to close Federal public lands in Unit 13 for the remainder of the State moose season, ending September 20, for two reasons. First, 43 CFR 51.19(c) states that the Board may reject a request for either an emergency or a temporary special action if the Board concludes that there are no time-sensitive circumstances necessitating a regulatory change before the next regular proposal cycle. WSA26-12 is not time-sensitive. This request was received by email on 9/15/2026, and the State season ends on 9/20/2026. It would not be possible to notify the public and enforce the closure within this short timeframe. Second, as referenced by 43 CFR 51.19(a), the available data does not support using an emergency special action to close public lands in Unit 13 to ensure the continued viability of moose, continue subsistence uses of moose, or protect public safety. I recognize that there is significant competition for moose in Unit 13 and that most hunters are nonfederally qualified subsistence users using the road system. The Board recently approved emergency special action WSA26-10, implementing a season extension	09/15/2026 at 11:21 AM

FSB Member	Vote	Justification	Vote received via email on
		through September 30, to provide federally qualified subsistence users with a meaningful priority and support the continued subsistence uses of moose. During those final 10 days of September, subsistence users will be able to hunt moose on Federal public lands in Unit 13 without competition from nonfederally qualified users. Using an additional emergency special action to close public lands for the remainder of the State season cannot be justified. There is no conservation concern for moose in Unit 13, and past closures have not demonstrated increases in harvest rates by federally qualified subsistence users.”	
Public Member Pitka	Support	“I support WSA26-12 to ensure the continuation of subsistence uses. WP26-31 passed during the FSB’s April meeting but was delayed in implementation. The Board fully intended for the closure, but it was never published in the Federal Register.”	09/15/2026 at 10:45 AM
NPS Regional Director Striker	Oppose	“NPS opposes WSA26-12 for the reasons articulated by RD Pendergast.”	09/15/2026 at 11:23 AM
Public Member Woods	Oppose	“FSB Member Woods opposes, understanding that the season is already open and that the regulatory change would hinder not only hunters but also managers and enforcement through this special action. I concur with Member Boario’s reasons for opposing and vote in confidence and common sense: ‘While this request is intended to implement the Board’s actions from April 2026, it was submitted during the Unit 13 moose hunting season, which is currently underway. This could cause confusion and conflict in the field. This is unlike previous special actions implementing the Board’s decisions before the beginning of a hunting season. We echo the justification provided by BLM for WSA26-10 in Unit 13: the Board recently supported a 10-day extension for the moose hunt in Unit 13, which will provide additional subsistence opportunity.’”	09/15/2026 at 1:11 PM