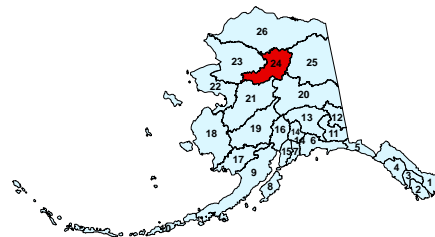
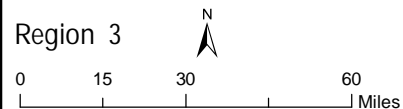


## Unit 24

Koyukuk

Region 3



### Game Management Units / Special Management Areas

- |   |  |   |
|---|--|---|
| <span style="display: inline-block; width: 15px; height: 10px; background-color: red; border: 1px solid black;"></span> Closed Areas          | <span style="display: inline-block; width: 15px; height: 10px; background-color: lightgreen; border: 1px solid black;"></span> National Parks                                      | <span style="display: inline-block; width: 15px; height: 10px; border: 1px dashed black;"></span> Military Boundary   |
| <span style="display: inline-block; width: 15px; height: 10px; background-color: pink; border: 1px solid black;"></span> Controlled Use Areas | <span style="display: inline-block; width: 15px; height: 10px; background-color: lightblue; border: 1px solid black;"></span> National Preserves & Other Federal Lands             | <span style="display: inline-block; width: 15px; height: 10px; border: 1px dotted black;"></span> Military Closure  |
| <span style="display: inline-block; width: 15px; height: 10px; background-color: yellow; border: 1px solid black;"></span> Management Areas   | <span style="display: inline-block; width: 15px; height: 10px; background-color: lightblue; border: 1px solid black;"></span> State Refuges, Sanctuaries, & Critical Habitat Areas | <span style="display: inline-block; width: 15px; height: 10px; background-color: gray; border: 1px solid black;"></span> Tangle Lakes Archaeological District |
| <span style="display: inline-block; width: 15px; height: 10px; background-color: purple; border: 1px solid black;"></span> Other State Lands  | <span style="display: inline-block; width: 15px; height: 10px; border: 2px solid red;"></span> Unit Boundary   | <span style="display: inline-block; width: 15px; height: 10px; border: 2px dashed red;"></span> Subunit Boundary  |
|   | <span style="display: inline-block; width: 15px; height: 10px; border: 1px solid black;"></span> City Boundary   | <span style="display: inline-block; width: 15px; height: 10px; border-bottom: 1px solid black;"></span> Roads   |
|   |  | <span style="display: inline-block; width: 15px; height: 10px; border-bottom: 1px dashed black;"></span> Railroads  |
|   |  | <span style="display: inline-block; width: 15px; height: 10px; border-bottom: 1px dotted black;"></span> Trails   |

**National Park Service  
U.S. Department of the Interior**



**Alaska Region**

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# **Sport Hunting and Trapping in National Preserves in Alaska**

*Environmental Assessment*

*August 2018*

### **Note to Reviewers**

If you wish to comment on this document, you are encouraged to do so through the NPS Planning, Environment, and Public Comment system at:  
<https://parkplanning.nps.gov/sporthuntingandtrapping>.

You may also mail or hand deliver comments to:

Sport Hunting and Trapping in National Preserves EA  
Alaska Regional Office, EPC  
240 West 5th Ave.  
Anchorage, AK 99501

Comments will not be accepted by fax, email, or by any method other than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment, including the personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee we would be able to do so.

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# 1. NEED FOR ACTION AND ISSUES ANALYZED

## 1.1 Need for Action

On October 23, 2015, the National Park Service (NPS) published a final rule (2015 rule) to amend its regulations for sport hunting and trapping in national preserves (NPs) in Alaska (80 FR 65325). The 2015 rule codified prohibitions on certain types of harvest practices that are otherwise permitted by the State of Alaska (State), and went into effect in January, 2016.

Since the publication of the 2015 rule, the Secretary of the Interior issued two Secretarial Orders regarding how the Department of the Interior should manage recreational hunting and trapping in the lands and waters it administers, and directing greater collaboration with state, tribal, and territorial partners in doing so. Consistent with those Secretarial Orders, the NPS has published a proposed rule that would remove sections of the 2015 rule, which prohibited certain sport hunting practices. Additional background information, including information related to the Secretarial Orders, is available in the preamble to the proposed rule at:

<https://www.federalregister.gov/documents/2018/05/22/2018-10735/alaska-hunting-and-trapping-in-national-preserves>.

Action is needed at this time to more closely align sport hunting regulations in national preserves in Alaska with State regulations, and to enhance consistency with harvest regulations on lands and waters surrounding national preserves in Alaska, in furtherance of Secretarial Orders 3347 and 3356.

## 1.2 Issues Analyzed in this Environmental Assessment

Issues related to the following resources and values are analyzed in detail in this environmental assessment (EA): wildlife; federal subsistence (subsistence) use; public use and experience; and wilderness character.

Issues related to archaeological or historic resources; fish and aquatic habitat; floodplains or wetlands; and threatened and endangered species were dismissed from detailed analysis for one or more of the following reasons:

- the environmental impacts associated with the issue are not central to the proposal or of critical importance;
- a detailed analysis of environmental impacts related to the issue is not necessary to make a reasoned choice between alternatives;
- the environmental impacts associated with the issue are not a significant point of contention among the public or other agencies; or
- there are not potentially significant impacts to resources associated with the issue.

## Appendix B – Summary of Methods of Take

**Table B-1. Methods of Take That Would be Allowed Under the Proposed Action (that are carried forward for detailed analysis)**

Prohibited under current State hunting regulations	Summary of exceptions to current State hunting regulation prohibitions (actions that would be allowed under the proposed action)
1- Using bait to harvest bears	<p><u>Where allowed generally (GMUs with national preserve overlap):</u></p> <p>GMUs 5, 9, 11, 12, 13*, 19, 20, 23, 24, and 25B, 25C April 15 - June 30, GMU 16* July 1 - October 15, April 15 - June 30, GMU 17 April 15 - May 31, GMU 19D East Predation Control Area: those portions of the Kuskokwim River drainage within GMU 19D upstream from Selatna River drainage and the Black River drainage. GMU 24C, *Bait restrictions (see State hunting regulations for more details)</p> <p><u>Conditions applicable to specific GMUs:</u></p> <p>-In GMUs 9, 11-13, 16, 17, 19-20, 24, and 25, a registered guide may operate up to ten bait stations at a time in each guide use area that they are registered to operate in. A guide contract is required for each hunter.</p> <p>- In GMUs 9, 11-13, 16, 17, 19, 20, 23-25, black bears (and brown bears where allowed-see GMUs listed below) may be taken at permitted bait stations the same day you have flown provided you are at least 300 feet from the airplane. This is NOT allowed on National Park Service lands.</p> <p>- In GMUs 11, 12, 13, 19D, 20C, 20E, 23, 24C, and 24D brown/grizzly bears may be taken at bear bait stations. Hunters must comply with seasons, bag limits, salvage, and sealing requirements for brown/grizzly bears (registration permits and locking-tags may be required in some areas, contact ADF&amp;G for details).</p>
2- Taking big game with the aid or use of a dog	Dogs may be used to hunt black bears under a permit issued by ADF&G.
3- Taking wolves from May 1 through August 9	<p><u>Wolf Seasons per 2017-2018 State hunting regulations and corresponding national preserve:</u></p> <p>GMU 9, 10: August 10- June 30 (Preserve in this GMU- Aniakchak, Lake Clark)</p>

Prohibited under current State hunting regulations	Summary of exceptions to current State hunting regulation prohibitions (actions that would be allowed under the proposed action)
	<p>GMU 12: August 10-May 31 (Preserve in this GMU- Wrangell-St. Elias)</p> <p>GMU 19: August 10-May 31 (Preserve in this GMU- Denali)</p> <p>GMU 20C, 21: August 10- May 31 (Preserve in this GMU- Denali and Yukon-Charley Rivers)</p> <p>GMU 22: August 1- May 31 (Preserve in this GMU- Bering Land Bridge)</p> <p>GMU 23: August 1 - Apr 30 (Preserve in this GMU- Noatak)</p> <p>GMU 24, 25: August 10- May 31 (Preserve in this GMU- Gates of the Arctic)</p>
4- Taking big game while the animal is swimming	Caribou may be taken while swimming in Noatak NP and portions of Bering Land Bridge NP and Gates of the Arctic NP (GMUs 23 and 26)



## Appendix C – Actions Dismissed from Detailed Analysis

Many of the prohibited actions in paragraph (g) of 36 CFR 13.42 are also prohibited by the State or other authorities, and therefore they would not occur under the proposed action. Other actions would only occur in limited cases under State hunting regulations. These actions, which include the following, are dismissed from detailed analysis in this EA:

- Shooting from, on, or across a park road or highway. (36 CFR 13.42 (g)(1))
  - Prohibited by the State
- Using any poison or other substance that kills or temporarily incapacitates wildlife. (36 CFR 13.42 (g)(2))
  - The Alaska Board of Game (BOG) has issued no authorizations since 2008, when it authorized U.S. Fish and Wildlife Service to use poison to remove invasive rats on Hawadax Island in Alaska Maritime National Wildlife Refuge. The State is unaware of any private citizen ever being authorized use of poison by the State (SOA 2018a).
- Taking wildlife from an aircraft, off-road vehicle, motorboat, motor vehicle, or snowmachine. (36 CFR 13.24 (g)(3))
- Taking big game by aircraft remains prohibited by 36 CFR 13.42(d) Using an aircraft, snowmachine, off-road vehicle, motorboat, or other motor vehicle to harass wildlife, including chasing, driving, herding, molesting, or otherwise disturbing wildlife. (36 CFR 13.42 (g)(4))
  - Prohibited by the State
- Using a machine gun, a set gun, or a shotgun larger than 10 gauge. (36 CFR 13.42 (g)(6))
  - Prohibited by the State
- Using the aid of a pit, fire, artificial salt lick, explosive, expanding gas arrow, bomb, smoke, chemical, or a conventional steel trap with an inside jaw spread over nine inches, except killer style traps with an inside jaw spread less than 13 inches may be used for trapping, except to take any species of bear or ungulate (36 CFR 13.42 (g)(7))
  - Prohibited by the State
- Using any electronic device to take, harass, chase, drive, herd, or molest wildlife, including but not limited to laser sights, electronically enhanced night vision scope, any device that has been airborne controlled remotely, and used to spot or locate game with the use of camera, video or other sensing device, radio or satellite communication,

cellular or satellite telephone, or motion detector in accordance with State restrictions (36 CFR 13.42 (g)(8))

- Prohibited by the State, except communications equipment may be used for safety.
- Using snares, nets, or traps to take any species of bear or ungulate (36 CFR 13.42 (g)(9))
  - Generally prohibited by the State. There is an exception that allows bears to be trapped under a formal predator control program, with a special permit. However, no formal predator control program for black bears currently exists.
- Taking black bears (including cubs and sows) with or without use of artificial light under customary and traditional use activities at den sites Oct 15 - Apr 30
  - This activity would occur in only one portion of one GMU that overlaps with one national preserve (GMU 24C). Only 2.85% of that one GMU overlaps with Gates of the Arctic NP. The State does not have data regarding number of cubs and sows harvested specifically, and black bears in GMU 24 are not required to be sealed, but in GMU 24C the State reported that four female black bears were harvested in 2012, and three male black bears were harvested in 2016, with no harvests in 2013, 2014, or 2015. Additionally, this activity is only authorized for customary and traditional use by resident hunters. Given both the low harvest rate and the small percentage overlap, this action is dismissed from detailed analysis.
- Taking coyotes (including pups) during an extended hunting season (current seasons would be extended between May 1 and August 9 per State regulations).
  - Coyotes are uncommon and seldom harvested in all GMUs that overlap with national preserves, except for Gates of the Arctic NP and Yukon-Charley NP, where they are lightly harvested (SOA 2014).

## Appendix D – Project Area Summary

**Table D-1. ANILCA National Preserve Areas, Wilderness Areas**

<b>NPS AREAS AND ACRES</b>	Aniakchak National Preserve	Bering Land Bridge National Preserve	Denali National Preserve	Gates of the Arctic National Preserve	Glacier Bay National Preserve	Katmai National Preserve (includes Alagnak Wild	Lake Clark National Preserve	Noatak National Preserve	Wrangell- Saint Elias National Preserve	Yukon-Charley Rivers National Preserve
Acres	458,124	2,632,522	1,304,242	948,203	58,406	359,819	1,294,116	6,548,727	4,306,002	2,236,875
Designated Wilderness <sup>1</sup>	0	0	0	0	0	60,000	348,000	5,821,000	1,866,000	0
Eligible Wilderness <sup>1</sup>	TBD	2,509,360	TBD	914,000	100	268,000	903,000	759,000	2,249,000	1,815,000

<sup>1</sup>Rounded to the nearest 1,000 acres. TBD indicates the acres are to be determined. The 100 eligible acres in Glacier Bay would be contiguous with designated wilderness in the park. Estimated eligible areas for Noatak and Yukon-Charley are from the 1986 GMPs and are not yet updated.

**Table D-2. Presence of Key Wildlife Species in Alaska National Preserves**

NPS AREAS AND SPECIES	Aniakchak National Preserve	Bering Land Bridge National Preserve	Denali National Preserve	Gates of the Arctic National Preserve	Glacier Bay National Preserve	Katmai National Preserve (includes Alagnak Wild River)	Lake Clark National Preserve	Noatak National Preserve	Wrangell- Saint Elias National Preserve	Yukon-Charley Rivers National Preserve
Wolves	✓	X	X	X	✓	✓	✓	X	X	X
Brown Bear	X	X	X	X	✓	X	X	X	X	X
Moose	X	X	X	X	✓	✓	✓	X	X	X
Caribou	X	✓	X	X	O	✓	X	X	X	X
Dall Sheep	O	O	X	X	O	O	X	X	X	X

Note: ANILCA Title II specifically identifies protecting habitat for and populations of certain wildlife species, but the Act is not limited to protecting only those species and habitat. Section 701 of ANILCA describes areas designated as wilderness in National Park System units. ANILCA Section 1301 required park area general management plans (GMPs) and ANILCA Section 1317 required wilderness area reviews for suitability or unsuitability, which are included with the GMP documents.

X means this key species was specifically noted in ANILCA for this area

O means this key species was not specifically noted in ANILCA for this area

✓ means this species is present in the area, but not highlighted in ANILCA as a key species

## Basic Information | Directions and Transportation



### Things To Do

(/gaar/planyourvisit/things2do.htm)

Learn about backpacking, birding, camping, and floating in the park

### Safety

(/gaar/planyourvisit/safety.htm)

Learn about safety concerns of your trip in northern Alaska's premier wilderness

Gates of the Arctic National Park and Preserve is a vast and essentially untouched wilderness park – with no roads, no trails, and no established campsites. The park has no set routes in place and visitors may wander at will across 8.4 million acres of superlative natural beauty. This is a place for discovery and exploration.

There are no established services within the park boundaries and only limited means of communication work effectively to contact anyone for assistance. Cell phones don't work here.

Visitors to the park should be PROFICIENT in outdoor survival skills, and be prepared to care for their own life and their partner(s) if an emergency arises.

The terrain is challenging: there are no established trails and the dense vegetation, tussocks, boggy ground, and frequent stream and river crossings can significantly slow progress across the landscape. Experienced hikers consider six miles a good day's travel in Gates of the Arctic National Park and Preserve.

If visitors are not proficient in wilderness back country skills, we recommend that they contact an outfitter, guide service, or air taxi operator for assistance.

For those visitors who don't have the time, or the backcountry skills to mount an expedition into the park, there are other options. Local air taxis provide flight-seeing trips, day trips or overnight camp outs at remote locations. Imagine a day spent fishing at an alpine lake, or watching the caribou up in the northern valleys, or sitting alongside a wild river listening to the wind in the boreal forest. Air taxis will also take visitors into neighboring Kobuk Valley National Park to get their passport stamp.

Whatever trip option you choose, be prepared for the experience of a lifetime.

Traveling in a remote wilderness park requires visitors to be self sufficient and flexible.

- You need to arrive at your jumping off point with everything you need for a safe and comfortable trip.
- Bush travel requires flexibility. There are many reasons for delays going in and out of the park. You should take enough food to remain in the park several extra days. It is also a good idea to have a back up route plan with maps just in case.
- Before you leave for your trip, contact the Park and Preserve for updates and advisories.
- Visitors in the park must practice [minimum impact techniques \(/gaar/planyourvisit/bcorientation.htm\)](/gaar/planyourvisit/bcorientation.htm), adhere to [Leave No Trace \(http://Int.org/programs/principles.php\)](http://Int.org/programs/principles.php) principles, follow backcountry safety guidelines, and be aware of the fragile ecosystems and private lands within the park.
- Before you go into the backcountry, stop by the Bettles Ranger Station, Coldfoot Arctic Interagency Visitor Center, Marion Creek Ranger Station (near Coldfoot), or Anaktuvuk Pass Ranger Station for a backcountry orientation.
- We request that you fill out the voluntary Back Country Registration Form.
- You will also have the opportunity to check out Bear Resistant Food Containers (BRFCs) at these locations. BRFCs are the easiest way to meet the mandatory food storage regulations for all overnight visitors in the Park.

Also visit our [Backpacking & Hiking](#) and [Wild & Scenic Rivers](#) pages to plan your trip.

[Visit the Basic Information page \(/gaar/planyourvisit/basicinfo.htm\)](/gaar/planyourvisit/basicinfo.htm) for operating hours and seasons, permits and reservations, and bringing pets to the park.

Lots of information for your visit, all packed into easily downloadable and printable PDF files! Please feel free to phone (907-692-5494) or [email us \(/common/utilities/sendmail/sendemail.cfm?](/common/utilities/sendmail/sendemail.cfm?o=4C84DAA9A2C5A6AF9DAF1CBDC61EA5AB498F4B8E48BF83917F11BE9450D189A9&r=/gaar/planyourvisit/index.htm)

[o=4C84DAA9A2C5A6AF9DAF1CBDC61EA5AB498F4B8E48BF83917F11BE9450D189A9&r=/gaar/planyourvisit/index.htm\)](/common/utilities/sendmail/sendemail.cfm?o=4C84DAA9A2C5A6AF9DAF1CBDC61EA5AB498F4B8E48BF83917F11BE9450D189A9&r=/gaar/planyourvisit/index.htm) if you have any questions that are not answered by this material.

[List of Outfitters, Guides, and Air Taxi Operators \(/gaar/getinvolved/do-business-with-us.htm\)](/gaar/getinvolved/do-business-with-us.htm)

Last updated: November 23, 2018

## CONTACT THE PARK

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Fairbanks, AK 99701

**Phone:**

907459-3730



[www.nps.gov](http://www.nps.gov)  
National Park Service  
U.S. Department of the Interior



## Recreation Visitors by Month Gates of the Arctic NP & PRES

*Ex. F*

Bookmark this report: [https://irma.nps.gov/Stats/SSRSReports/Park%20Specific%20Reports/Recreation%20Visitors%20By%20Month%20\(1979%20-](https://irma.nps.gov/Stats/SSRSReports/Park%20Specific%20Reports/Recreation%20Visitors%20By%20Month%20(1979%20-)

Year	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Total
2019	0	0	74	91	454	647							1,266
2018	15	0	280	155	226	1,949	2,797	2,980	1,153	36	0	0	9,591
2017	198	119	280	155	355	2,364	3,145	3,533	1,013	15	0	0	11,177
2016	306	310	389	172	164	1,349	3,026	3,137	1,027	29	18	120	10,047
2015	137	138	272	68	354	2,071	2,968	3,393	1,100	0	0	244	10,745
2014	501	501	928	218	342	2,508	3,195	3,665	720	12	12	67	12,669
2013	230	302	127	5	215	2,175	3,377	3,882	606	0	0	93	11,012
2012	249	148	196	50	10	2,447	3,432	3,412	738	10	78	129	10,899
2011	70	70	182	15	51	2,832	3,713	3,716	860	2	25	87	11,623
2010	134	102	99	0	456	2,547	3,191	3,419	760	10	17	105	10,840
2009	19	81	80	12	41	2,533	3,471	3,020	659	0	0	59	9,975
2008	39	0	44	0	538	2,788	3,777	3,597	545	0	0	69	11,397
2007	1	2	8	0	349	2,926	3,473	3,588	585	0	3	7	10,942
2006	24	0	14	11	113	2,495	3,487	3,263	565	5	0	5	9,982
2005	0	4	4	1	269	2,822	3,128	2,929	302	0	0	0	9,459
2004	0	10	35	31	234	2,698	3,422	3,338	512	0	0	2	10,282
2003	0	1	8	11	38	1,952	2,422	536	85	11	5	6	5,075
2002	5	20	27	13	109	1,537	2,364	2,196	331	31	13	2	6,648
2001	38	45	56	28	93	1,457	2,077	316	80	83	130	102	4,505
2000	19	49	62	0	334	4,330	5,959	318	150	6	0	51	11,278
1999	70	64	210	81	249	1,885	2,548	2,414	435	91	62	57	8,166
1998	19	43	92	41	204	2,269	3,051	1,884	432	105	74	52	8,266
1997	11	49	60	51	18	1,697	2,546	2,374	86	24	16	17	6,949
1996	15	30	37	35	29	1,456	2,483	2,178	101	20	27	37	6,448
1995	12	51	51	43	22	1,461	2,746	2,393	249	15	23	8	7,074
1994	8	8	38	32	32	182	526	795	55	19	19	12	1,726

### Additional Calculations

Prepared from NPS Data

Jan. thru Apr.	Oct. thru Jan.	Total
752	36	788
1,177	15	1,192
615	167	782
2,148	244	2,392
664	91	755
643	93	736
337	217	554
335	114	449
192	132	324
83	59	142

**average 811**



1993	9	14	38	20	55	269	720	983	107	15	6	9	2,245
1992	16	18	39	65	75	399	647	732	93	19	6	7	2,116
1991	15	16	36	22	52	152	382	403	43	23	8	2	1,154
1990	2	2	33	19	19	138	337	413	47	0	0	0	1,010
1989	0	21	20	27	20	88	332	246	60	4	3	1	822
1988	0	9	20	12	33	84	547	505	42	6	0	0	1,258
1987	14	16	19	21	46	133	296	444	40	18	11	2	1,060
1986	9	22	67	103	30	116	816	1,490	107	19	12	10	2,801
1985	48	8	21	74	11	213	351	525	64	2	10	54	1,381
1984	20	66	58	63	41	402	447	965	295	61	12	10	2,440
1983	5	5	11	30	75	279	701	673	279	45	22	13	2,138
1982	40	44	42	28	35	109	357	486	135	35	35	35	1,381



# Promises to Keep

## Subsistence in Alaska’s National Parks

National Park Service  
U.S. Department of Interior



Stephen Foster Collection  
University of Alaska Fairbanks, Archives #69-92-48

Lake Minchumina, early 1900s.

Alaska’s abundance of natural resources form the backbone of life and economy of many people of Alaska. Today, as in the past, many Alaskans live off the land, relying on fish, wildlife and other wild resources. Alaska Natives have used these subsistence resources for food, shelter, clothing, transportation, handicrafts and trade for thousands of years. Subsistence, and all it entails, is critical to sustaining both the physical and spiritual culture of Alaska Native peoples. It is an important tradition for many non-Natives as well.

When the first Europeans visited Alaska’s shores during the 1740s, all the local residents they met were engaged in a subsistence lifestyle. As the population grew through the territorial days, many new and conflicting demands were made on Alaska’s natural and cultural resources. Development in various forms, such as harvesting marine and inland furbearers, commercial fisheries, mining operations, agriculture, development of military bases, along with establishment of cities and towns often impacted local resources and subsistence activities. By the time Alaska gained statehood in 1959, subsistence patterns in some of Alaska’s more populated areas had been greatly affected.

In the years that followed statehood, the pace of change accelerated and developments abounded in Alaska’s remote areas. In response, rural residents began to organize, and before long they petitioned government officials in hopes of retaining some protection for their land base and their subsistence way of life. In deliberations leading to the Alaska Native Claims Settlement Act (ANCSA) of 1971, the U.S. Congress acknowl-

edged the importance of subsistence hunting and fishing to Alaska Natives, but provided no specific protection on federal public lands.

Nine years later, Congress formally recognized the social and cultural importance of protecting subsistence uses by both Native and non-Native rural residents when it passed the Alaska National Interest Lands Conservation Act (ANILCA). This legislation created millions of acres of new national park and preserve additions in Alaska.

Subsistence users have a unique connection to the land, fostered by tradition and lifelong experience. National Park Service Native Liaison and Heritage Specialist Herbert Anungazuk elegantly describes the cultural importance and relationship of traditional ecological knowledge to Native cultures. “Since dawn immemorial, the land and the sea was our classroom of survival, and it was the observant elder and hunter who shared the knowledge they gained from their special moments with the

elders and from their observations as a hunter. These stories of the people and the land and the sea are inseparable. They are part of the quest to survive.”

Subsistence resource commissions have been established for most national parks and monuments in Alaska to provide meaningful participation and involvement of local subsistence users in planning and management decisions affecting subsistence. With the passage of ANILCA, the American people made a promise

that is imperative to keep: to preserve and protect some of our nation’s most splendid natural ecosystems and treasured landscapes while providing the opportunity for those engaged in a traditional subsistence way of life to continue to do so. As Carol Jorgensen, Tlingit Indian and former Subsistence Regional Advisory Council Coordinator stated, “Subsistence... is the very blueprint within our souls that describes who we are as a people, and how we depend on our brothers and sisters of earth, air and water.”

**Ex. G**  
*“Subsistence defines us. We battle the elements and sometimes risk our life to get the foods we crave. It is not an easy life, but it is ours.”*  
**Arthur Lake,**  
Kwigillingok Tribal Member



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The subsistence lifestyle calls on all members of the community to participate and share the natural resources harvested.



© Paul Starr

Seasonal cabins are commonly used when trapping.



© Julie Collins

Berries are used to make juice, jam and syrup.



© Julie Collins

Some methods of harvest have changed over the years but many remain intact. Nets and hand lines are efficient means of harvesting fish.



© Terry Holmes

## Living Cultures

In Alaska, areas that are now called national parks and wilderness areas encompass some of the oldest inhabited land in North America. Archeologists theorize that humans entered the North American continent between 25,000 and 28,000 years ago, crossing over the now submerged landmass called the Bering Land Bridge. More recently, radiocarbon dated sites put humans on the Alaska landscape 12,000 to 14,000 years

ago. Most importantly, Alaska Natives have maintained an intricate and vital connection to the land for countless generations, and that connection continues to be essential for their cultural, spiritual and economic way of life.

Regardless where you go in Alaska, Native cultures have evolved as part of ecosystems and landscapes they inhabit. This relationship and connection to the land, water and resources has remained unbroken. ANILCA recognized the importance and significance of the cultural and subsistence components in Alaska’s ecosystems and incorporated protections into the law to ensure the opportunity for both Native and non-Native Alaskans to engage in a subsistence way of life.

Traditional ecological knowledge is the system of knowledge gained by experience, observation and analysis of natural events that is shared among members of a community. In subsistence that knowledge is used to find, harvest, process, store and sustain natural resources that are needed for food, clothing and shelter. Subsistence users are taught at a very young age that they are not to waste subsistence resources, especially fish and wildlife. Alaska Natives are to take only what is needed and when it is needed. They are to treat all living things with respect, and they are not to damage the land without cause. Subsistence is a living tradition based on a deep respect for wildlife and for sharing resources with others in their community.



© Sue Entwinger

Above:  
An elder teaches young people how to prepare moose stomach, passing down time-honored traditions.



© Sue Entwinger

Left:  
Children get involved in subsistence harvest at an early age. Here these children are spotting for sheep.

*“Subsistence is a way that Native peoples of Alaska have preserved their cultures. This way of life is not confined to the land. It stretches out to the sky and...the waters and rivers. The creatures of the earth give themselves to the people, who in turn share with family and friends, shaping relationships that celebrate life.”*

**Helga Eakon,**  
U.S. Fish and Wildlife Service  
Interagency Coordinator



# Subsistence in Alaska's National Parks



National Park Units with Subsistence hunting and fishing

National Park Units where Subsistence hunting and fishing are not permitted

“Since dawn immemorial, the land and the sea was our classroom of survival, and it was the observant elder and hunter who shared the knowledge they gained from their special moments with the elders and from their observations as a hunter. These stories of the people and the land and the sea are inseparable. They are part of the quest to survive.”

Herbert Anungazuk,  
National Park Service  
Native Liaison and Heritage Specialist



No part of an animal is wasted; hides are used for clothing, oil and meats for consumption.



Winter is also an active time for trapping.



Fish are harvested year-round in many parts of Alaska.



“The subsistence lifestyle is a learned thing, and there’s quite a bit of knowledge of animals and seasons... watching the animals, if some population is low you don’t hunt those. I’m teaching my kids these things and they are learning this knowledge. Maybe only one will stay [in Wiseman], maybe both will. But that one will then pass that knowledge on, that’s the way the subsistence lifestyle is propagated.”

Jack Reakoff,  
Wiseman Resident

## Seasonal Subsistence Uses

Changing economic and social opportunities in some communities have influenced the level of use and dependence on subsistence resources. Still, many subsistence users depend upon the land for nearly every aspect of their lives. Each summer and fall they plant gardens, fish, harvest moose or other game and gather berries. During winter months they travel by dog team, snowmachine and

snowshoes. They harvest wild fur animals for income, meat and clothing. Hides and fur can be sewn into comfortable and warm clothing to ward off the severe Alaska cold. The land provides wood for firewood, drying racks and cabin logs, as well as for making sleds and snowshoes. The land also provides sod and mosses to insulate shelters and bark for baskets, dyes and handicrafts.



Fishwheels, like this one on the Copper River, are an effective way to catch fish.



Fall is prime berry picking season.



Although dog teams are still used in some areas, most subsistence users prefer snowmachines for travel in winter.



Fur is used to make warm clothing.

## Timeline

**Pre-1867**  
For thousands of years, Alaska Natives harvest fish and wildlife resources



Medfra fish camp in 1964.

**1959**  
Alaska becomes a state.

**1867-1958**  
Following the Alaska Purchase, the federal government manages Alaska's fish and wildlife resources. However, harvesting by Natives was specifically exempted from fish and game laws enacted in 1902, 1924 and 1925.

**1980**  
Congress passes the **Alaska National Interest Lands Conservation Act**, creating 104 million acres of new parks, preserves and wildlife refuges. Title VIII of ANILCA protects subsistence needs of rural Alaskans.

**1990**  
The federal government begins managing subsistence hunting and trapping on Alaska's federal public lands.

**1999**  
Federal subsistence management expands to include fisheries on most federally managed waters



[http://www.newsminer.com/features/outdoors/activists-debate-native-hibernating-bear-hunting/article\\_095ba4ec-fcfb-11e7-bb3e-230e8281fc17.html](http://www.newsminer.com/features/outdoors/activists-debate-native-hibernating-bear-hunting/article_095ba4ec-fcfb-11e7-bb3e-230e8281fc17.html)

## Activists debate Native hibernating bear hunting

Sam Friedman [sfriedman@newsminer.com](mailto:sfriedman@newsminer.com) Jan 19, 2018

FAIRBANKS — Congressional debate about Alaska hunting rules in April brought a spotlight on a little-understood Alaska Native technique of hunting bears in dens.

At a November meeting in Anchorage, the issue pitted Alaska Native students fresh from a class on how to defend traditional hunting practices against animal rights activists from Florida drawn to Alaska by an obscure piece of law that says it's permissible under certain conditions to kill bear cubs.

Harvesting a bear during its winter hibernation is a way to get fresh bear meat in the winter. It is recognized under Alaska subsistence hunting rules as a "customary and traditional use" of black bears in six Alaska game management units in the western and northern Interior.

The hunt used to be more widely practiced, including in the Tanana Valley. In his 1986 oral history autobiography, Minto Chief Peter John — who was born in 1900 — described hunting bears in dens with a .22-caliber rifle and even with an ax.

Today, finding bears in dens remains important along the Koyukuk River, said Ricko DeWilde, the owner of HYDZ, an Alaska Native-inspired clothing design business in Fairbanks. DeWilde grew up outside of Huslia and returns to the Koyukuk River area for fall hunts, including the search for denning bears.

"We start hunting them around when the leaves fall and they den up. Later on, we'll check around the rivers for places we think they might be in," he said.

"Families might check 80 to 100 dens and they might get lucky and maybe get one to five bears."

Bears are among the most respected of animals among the Koyukon Athabascan people, and there are rules for what parts of the bear women are allowed to eat, he said. Even talking about bears is frowned upon among some people, he said.

In November, DeWilde was one of 20 students who took a class, Introduction to the Board of Game, offered by the University of Alaska Fairbanks and Tanana Chiefs Conference during the meeting. At the meeting, he testified against a proposal from animal rights organization OneProtest that would have made it illegal for hunters to kill bear cubs, which in practice would have ended den hunting.

The proposal, according to DeWilde and others who testified, was based on the misconception that hunters target young bear cubs. In fact, hunters try not to get dens with cubs, but are obligated to kill the cubs if they find them in a den with a sow.

In April 2017, animal rights advocates around the world turned their attention to Alaska because of an act of Congress that removed some hunting restrictions on federal wildlife refuges in Alaska. The law didn't affect subsistence, so it actually didn't change the rules for killing bear cubs.

Volunteers with OneProtest, which is based in Jacksonville, Florida, researched the issue and learned that under a few conditions it's legal to kill sows with cubs in Alaska, an idea the activists found particularly "barbaric." A petition organized by the group to outlaw cub hunting in Alaska received nearly 30,000 signatures.

OneProtest was founded to ban bear hunting in Florida, and now has several animal welfare campaigns across the country. In addition to its Alaska campaign, the group has tried to stop bear hunting in New Jersey and to close Mexico's San Juan de Aragon zoo for poor treatment of animals.

Two OneProtest volunteers traveled to Anchorage in November to ask Alaska's Board of Game to eliminate the two exceptions for Alaska's prohibition on killing bear cubs: Alaska's rules allow the killing of cubs in the Yukon Flats north of Fairbanks under a provision the OneProtest volunteers learned was created because of nuisance bears. In a second, and geographically larger area, the rules allow the killing of cubs in bear den hunts.

The Board of Game voted OneProtest's proposal down unanimously, which is the board's usual reaction to proposals from environmental groups. But in a scene unusual in the long and contentious history between animal rights activists and Alaska hunters, the two groups met and found some common ground.

DeWilde, who shook his head and dismissed the OneProtest activists as "super bunny huggers" during their testimony, later talked to them in the hotel lobby.

“They were really open-minded, it turned out. You could tell they really respected the way we live and the respect we had for the animal. There’s a lot that goes into harvesting that animal (bears). That is the most respected animal.”

After the meeting, OneProtest updated its campaign website ([oneprotest.org/](http://oneprotest.org/)

bearcubs) with information about its Alaska trip, and created a video apology. The OneProtest activists said they were moved not only by UAF students, including DeWilde, but also by the regional advisory committees from Yupik communities in western Alaska.

“To the Alaskan Native peoples, pitsaqenrita (Yupik for ‘I’m sorry’). We apologize for any offense our initial misunderstanding caused,” a message at the end of the video stated..

Alaska Fish and Game Commissioner Sam Cotten noticed the interaction between the groups and wrote about it in an opinion column published last month in the Daily News-Miner and newspapers in Anchorage and Juneau. He praised the work of students from the UAF Introduction to the Board of Game class.

“They’ve earned lasting respect from the Alaska Board of Game — and from an Outside group representing different cultural values that ... may have received the greatest education of all,” Cotten wrote.

Back in Florida, one of the OneProtest activists who came to Anchorage said it’s true their trip to Alaska was educational but disagreed with Cotten’s carpetbagger characterization of their group. The group has supporters in Alaska, including a woman in Anchorage who testified with them at the Board of Game meeting, he said.

“Unfortunately, Sam Cotten’s article was factually correct but it left out some important information,” said OneProtest activist Robert Evans. “There were other Alaskans who were supporting this.”

Evans said he’s still interested in working to change Alaska hunting rules in the future, but might take on a different topic, such as Alaska’s predator control policies. If he could do it again, he said, he’d also try to work with Alaska’s regional advisory committees instead of writing his own proposal.

“We would have done more at the grass roots to have the advisory panels do the proposal rather than us,” he said. “It’s got to be coming from Alaskans. There can’t be any perception, even though that wasn’t the case here, that it’s coming from an outside source.”

*Contact Outdoors Editor Sam Friedman at 459-7545. Follow him on Twitter: @FDNMoutdoors*