

## Federal Subsistence Wildlife Proposal

**Proponent:** Southeast Alaska Subsistence Regional Advisory Council

**Issue:** Close Federal public lands to deer hunting by non-federally qualified users in Unit 2.

The Council also submitted a companion special action request for the 2025 deer season.

### Current Federal Regulations:

#### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct.15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.* Jul. 24 – Jan. 31

*Federal public lands on Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 - Aug. 15, except by Federally qualified subsistence users hunting under these regulations.*

*Non-federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

### Proposed Federal Regulations:

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## **Justification**

The Council believes this closure is necessary for the conservation of a healthy deer population in Unit 2 and to continue the subsistence uses of deer by Unit 2 residents. Prince of Wales Island (POW) residents are not meeting their subsistence needs for deer, which is one of the most harvested and utilized subsistence resources by POW communities. Increasing competition with non-federally qualified users over a dwindling resource is also a growing concern.

While biological data are lacking with no actual population estimates, traditional ecological knowledge (TEK) from POW residents and public comments received during Council meetings strongly attest to the significant decline of the Unit 2 deer population. Using harvest as index for population size, this TEK is corroborated by substantially decreasing reported deer harvest since 2015. Of particular alarm, the Unit 2 deer population has not positively responded to the mild winters over the past two years. Deer populations usually increase as a result of mild winters due to higher over winter survival rates because forage is more accessible. However, while Units 1, 3 and 4 saw an uptick in deer harvest in response to the mild winters, Unit 2 harvest slightly declined.

The Council views this proposal as a proactive measure to conserve the Unit 2 deer population before the situation becomes even more dire as one bad winter could devastate the population and greatly prolong recovery. While multiple, interactive factors such as predation, habitat loss, and weather have contributed to the decline of the Unit 2 deer population, hunting and harvest mortality are the most controllable factors. The Council is also concerned about the age structure of the deer population as hunters often harvest large bucks, which negatively impacts reproduction as does are less likely to breed with younger bucks.

The Council also has immense trepidation about the impacts of Ketchikan becoming a rural, federally qualified community on the deer population and subsistence users in Unit 2. However, the Council understands that restricting non-federally qualified users is necessary before restrictions to subsistence users may occur. The Council also submitted a request to conduct a §804 user prioritization analysis for Unit 2 deer.

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