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FEDERAL SUBSISTENCE BOARD

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SPECIAL ACTION MEETING

4

July 17, 2025

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MEMBERS PRESENT:

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Rhonda Pitka, Acting Chairman

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Benjamin Payenna, Public Member

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Sara Boario, U.S. Fish and Wildlife Service

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Dave Alberg, National Park Service

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Kevin Pendergast, Bureau of Land Management

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Glenn Chen, Bureau of Indian Affairs

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Nicole Grewe, U.S. Forest Service

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P R O C E E D I N G S

(FSB - 07/17/2025)

(On record - 12:55 p.m.)

MS. LAVINE: Hello, everyone. This is Robbin LaVine. I'm the Subsistence Policy Coordinator for the Office of Subsistence Management. We are waiting for all of our Board members to join us for this public meeting on Wildlife Special Actions 25-01, 25-02 and 25-03.

If you can keep your phones and your team mikes muted until we begin, we'd appreciate it. If you're calling in by phone, you can press \*6 to mute and unmute yourself. That's \*6 and we will beginning shortly.

Thank you.

MR. ALBERG: Good afternoon, everyone. This is Dave with NPS just doing a quick microphone check.

MS. LAVINE: We can hear you, Dave. This is Robbin.

MR. ALBERG: Awesome. Hey, Robbin, I hope you're well and I hope everybody else is doing all right. Look forward to the meeting today.

MS. LAVINE: Thanks. Good to have you on. At the moment I believe we have Rhonda Pitka, Sara Boario, Dave Alberg. Who else do we have on from our Federal Subsistence Board?

MS. JOHN: This is Jolene John, BIA Alaska Region, but Glenn Chen will be representing me as I'll be in and out.

MS. LAVINE: Jolene, thanks for calling in. Kevin, I did hear you say that you're on as well?

KEVIN: Yes.

MS. LAVINE: Hi, Kevin.

KEVIN: Robbin, Eva is here with me as

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1 well.

2

3 MS. LAVINE: Thank you. Do we have  
4 public members Benjamin on?

5

6 (No response)

7

8 MS. LAVINE: Ray Oney on?

9

10 (No response)

11

12 MS. LAVINE: Or Charlie?

13

14 (No response)

15

16 MS. LAVINE: We'll wait a little bit  
17 longer.

18

19 REPORTER: Robbin, this is Nathan. I'm  
20 good to go when we get started.

21

22 MS. LAVINE: Thank you, Nathan.

23

24 MADAME CHAIR PITKA: Hi, this is Rhonda  
25 Pitka. It is 1:00 p.m. Can we start the roll call,  
26 please.

27

28 MR. LIND: Madame Chair, this is  
29 Orville. Waiting for a couple more people to join us.

30

31 MADAME CHAIR PITKA: Thank you so much,  
32 Orville. I appreciate that.

33

34 MS. LAVINE: Hello, everyone. This is  
35 Robbin LaVine, Subsistence Coordinator for the Office  
36 of Subsistence Management. Thank you all for calling  
37 in. This is the public meeting for Wildlife Special  
38 Actions 25-01, 25-02 and 25-03 pertaining to Unit 2  
39 deer. We are still waiting for a number of individuals  
40 to join us. If you can have some patience, we should  
41 be starting shortly.

42

43 (Pause)

44

45 MS. LAVINE: Hello, everyone. This is  
46 Robbin LaVine, Subsistence Policy Coordinator with OSM.  
47 Have public members Ray, Ben or Charlie joined us in  
48 the last few minutes? If you call in, you can press \*6  
49 to unmute your phones and say hello.

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1 MR. GALLEGOS: This is Tony Gallegos,  
2 Cultural Resource Director for Ketchikan Indian  
3 Community calling in.

4  
5 MS. LAVINE: Hi, Tony. Good to have  
6 you on.

7  
8 (Pause)

9  
10 MS. LAVINE: Hello, everyone. This is  
11 Robbin LaVine, Subsistence Policy Coordinator for the  
12 Office of Subsistence Management. This is the Federal  
13 Subsistence Board meeting for Wildlife Special Actions  
14 25-01, 25-02 and 25-03 pertaining to Unit 2 deer. This  
15 meeting has been scheduled to start at 1:00 pm. We  
16 thank you for your patience. I believe we may have  
17 enough people to determine if we have a quorum.

18  
19 Madame Chair, what say you?

20  
21 MADAME CHAIR PITKA: I suggest that we  
22 take a roll call and see who we have on.

23  
24 MS. LAVINE: Thank you, Madame Chair.

25  
26 MADAME CHAIR PITKA: Thank you very  
27 much.

28  
29 MS. LEONETTI: Okay. With that then I  
30 will do a roll call. This is Crystal Leonetti.  
31 Ciisquq is my Yup'ik name. I am the Director for the  
32 Office of Subsistence Management. Welcome everyone.

33  
34 For the roll call. Tony Christianson,  
35 the Chair, is excused. Rhonda Pitka.

36  
37 MS. PITKA: Here.

38  
39 MS. LEONETTI: Charlie Brower.

40  
41 (No response)

42  
43 MS. LAVINE: Madame Chair, Charlie  
44 Brower has unfortunately just had to board a plane and  
45 will not be able to join us at this time. Thank you,  
46 Madame Chair.

47  
48 MS. LEONETTI: Thank you, Robbin.  
49 Benjamin.

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1 MR. PAYENNA: Here.

2

3 MS. LEONETTI: Ray Oney.

4

5 (No response)

6

7 MS. LEONETTI: He may be joining  
8 shortly. Frank Woods is excused. For BIA, Bureau of  
9 Indian Affairs, Glenn Chen.

10

11 MR. CHEN: Yes, Glenn Chen is here and  
12 I'll be representing Jolene John for the BIA.

13

14 MS. LEONETTI: Thank you, Glenn. For  
15 Bureau of Land Management, Kevin Pendergast.

16

17 MR. PENDERGAST: Here.

18

19 MS. LEONETTI: Hi, Kevin. Welcome.  
20 For the Forest Service, Nicole Grewe.

21

22 MS. GREWE: Hello. Nicole Grewe here.  
23 I'm Forester for Region 10. Thank you.

24

25 MS. LEONETTI: Hi, Nicole. Welcome.  
26 Thank you. Fish and Wildlife Service, Sara Boario.

27

28 MS. BOARIO: Good afternoon, Ciisquq.  
29 This is Sara Boario, Regional Director for the Fish and  
30 Wildlife Service.

31

32 MS. LEONETTI: Thank you, Sara. And  
33 National Park Service, David Alberg.

34

35 MR. ALBERG: Good afternoon, everybody.  
36 David Alberg here for Park Service.

37

38 MS. LEONETTI: Excellent. I'd also  
39 like to note we have liaisons to the Board today from  
40 Alaska Department of Fish and Game, Deputy Commissioner  
41 Ben Mulligan, as well as the Southeast Regional  
42 Advisory Council Chair Don Hernandez.

43

44 So welcome, and I'll turn it back over  
45 to you, Rhonda. Madame Chair, we do have a quorum.

46

47 MADAME CHAIR PITKA: Thank you very  
48 much and thank you, everybody, for calling in. Right  
49 now I believe Robbin has some housekeeping items.

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1 MS. LAVINE: Yes. Thank you, Madame  
2 Chair. Good afternoon everybody. Once again this is  
3 Robbin LaVine, Subsistence Policy Coordinator. Before  
4 we begin I wanted to note that these three Special  
5 Action Requests were submitted in anticipation in a  
6 change in status for the community of Ketchikan from  
7 nonrural to rural.

8  
9 Our regulations specialist Justin can  
10 give us an update on that final rule. Justin.

11  
12 MR. KOHLER: Thanks, Robbin. Good  
13 afternoon, Madame Chair, Members of the Board. My name  
14 is Justin Kohler. I'm the Regulations Specialist at  
15 the Office of Subsistence Management. The Board's  
16 actions from the February regulatory meeting need to be  
17 enacted by publishing a final rule in the Federal  
18 Register. That final rule is currently out for public  
19 inspection at federalregister.gov and scheduled to  
20 publish tomorrow.

21  
22 So the regulation changes adopted by  
23 the Board at the February meeting, including the  
24 Ketchikan Rural Determination, will be effective upon  
25 publishing. So beginning tomorrow residents of  
26 Ketchikan will be able to harvest fish and wildlife  
27 under Federal subsistence regulations.

28  
29 That's the update.

30  
31 Thank you, Madame Chair.

32  
33 MADAME CHAIR PITKA: Thank you very  
34 much, Mr. Kohler.

35  
36 MS. LAVINE: A couple more housekeeping  
37 items. Three Special Actions were submitted. Wildlife  
38 Special Action 25-01, 02, 03. I just want to note that  
39 Wildlife Special Actions 25-01 and 03 have been  
40 analyzed together because they're connected. So only  
41 two analyses will be presented.

42  
43 I want to note that there will be an  
44 opportunity for testimony after each analysis. The  
45 Chair will announce those opportunities when we get to  
46 that point in the meeting. So please keep your ears  
47 peeled and, again, there will be two separate  
48 opportunities to provide testimony. Once for Wildlife  
49 Special Actions 25-01 and 03 and, secondly, for  
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1 Wildlife Special Action 25-02.

2

3 Thank you, Madame Chair.

4

5 MADAME CHAIR PITKA: Thank you very  
6 much. I appreciate everybody calling in. Right now is  
7 the time to review and adopt the agenda. So I'm asking  
8 for a motion to adopt the agenda.

9

10 MR. PAYENNA: So moved.

11

12 MS. BOARIO: Madame Chair. Fish and  
13 Wildlife Service moves.

14

15 MADAME CHAIR PITKA: Thank you, Fish  
16 and Wildlife Service. I believe I heard somebody  
17 online.

18

19 MR. PAYENNA: That was me making a  
20 motion. I didn't hear anybody else making it.

21

22 MADAME CHAIR PITKA: Okay. Would you  
23 like to second the motion?

24

25 MR. PAYENNA: That works.

26

27 MADAME CHAIR PITKA: Thank you very  
28 much, Mr. Payenna. We have a motion and a second.  
29 All in favor say aye to adopt the agenda.

30

31 IN UNISON: Aye.

32

33 MADAME CHAIR PITKA: Okay. It sounds  
34 like the motion passed. Now we are at Wildlife  
35 Temporary Special Action Request WSA-25-01/03. We are  
36 at presentation of the analysis by Jason Roberts.

37

38 MR. ROBERTS: All right. Hello,  
39 everyone. I'm Jason Roberts. I'm an anthropologist  
40 with the Office of Subsistence Management. Wildlife  
41 Special Action WSA25-01 requests closing Federal public  
42 lands in Unit 2 to deer hunting by non-Federally  
43 qualified users for the 2025/26 regulatory year due to  
44 ongoing conservation concerns and the need to continue  
45 subsistence uses among Federally qualified subsistence  
46 users.

47

48 Wildlife Special Action WSA25-03  
49 requests conducting an ANILCA Section .804 subsistence

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1 user prioritization analysis for Unit 2 deer for the  
2 2025/26 regulatory year due to ongoing conservation  
3 concerns and the need to continue subsistence uses  
4 along a subset of local subsistence users who are most  
5 dependant upon the resource.

6  
7               These two Special Action Requests were  
8 analyzed together because they are related.  
9 Restrictions to non-Federally qualified users are  
10 enacted before restricting Federally qualified users  
11 via Section .804. Both requests were submitted by the  
12 Southeast Regional Advisory Council.

13  
14               The proponent states that a closure to  
15 non-Federally qualified users in an .804 analysis for  
16 the 2025 regulatory year is necessary for the  
17 conservation of a healthy deer population in Unit 2 and  
18 to continue the subsistence uses of deer for Unit 2  
19 residents.

20  
21               The proponent explains that deer are  
22 one of the most important subsistence resources for  
23 Prince of Wales Island residents, but residents have  
24 not been meeting their subsistence needs for deer in  
25 recent years. The proponent notes that recent  
26 reductions in the Unit 2 deer population are  
27 exacerbated by substantial competition with  
28 non-Federally qualified users and other non-local users  
29 who come to Unit 2 to hunt.

30  
31               The proponent is also concerned about  
32 the age structure of the deer population as many  
33 hunters often target large bucks, which negatively  
34 impacts reproduction because does are less likely to  
35 breed with younger bucks.

36  
37               The proponent argues that biological  
38 data are lacking with no actual population estimates,  
39 and that tracking of the Unit 2 deer population has  
40 been limited to reported hunter participation and  
41 harvest data in recent years. However, traditional  
42 ecological knowledge from Prince of Wales residents and  
43 public comments received during Southeast Council  
44 meetings strongly attest to a substantial decline of  
45 the Unit 2 deer population.

46  
47               Using harvest as index for population  
48 size, this traditional knowledge is corroborated by  
49 substantial declines in reported deer harvest taken  
50



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1 from Unit 2 since approximately 2015. Of particular  
2 concern to the proponent, the Unit 2 deer population  
3 does not appear to have positively responded to the  
4 mild winters of the past two years.

5  
6 The proponent further explains that the  
7 recent designation of Ketchikan as a rural community  
8 within the Federal Subsistence Management Program could  
9 have detrimental impacts on Unit 2 deer populations and  
10 local hunter opportunity as without any accompanying  
11 regulatory changes Ketchikan residents will soon have  
12 or will have expanded hunting seasons and higher  
13 harvest limits in Unit 2 as Federally qualified users.

14  
15 The proponent also notes that during  
16 deliberations on Ketchikan's rural status, Ketchikan  
17 residents and members of the Federal Subsistence Board  
18 suggested that the .804 subsistence user prioritization  
19 process was an appropriate and effective measure to  
20 deal with the negative impacts that Ketchikan's change  
21 in rural status might have on local subsistence users  
22 and the continuation of subsistence uses, particularly  
23 regarding Unit 2 deer population.

24  
25 The proponent views WSA25-01 and  
26 WSA25-03 as proactive measures to conserve the Unit 2  
27 deer population and continues subsistence uses for  
28 local users before the situation gets worse, as one bad  
29 winter could devastate the deer population and greatly  
30 prolong recovery. The proponent explains that while  
31 multiple, interactive factors such as predation,  
32 habitat loss, and weather have contributed to the  
33 decline of the Unit 2 deer population, hunting and  
34 harvest mortality are the most controllable factors.

35  
36 So looking at the regulatory history.  
37 In 2002 WP03-04 was submitted by the Southeast Council  
38 requesting to extend the deer hunting season in Unit 2  
39 to increase hunting opportunities for residents earlier  
40 in the season. The Board adopted this proposal to  
41 provide greater subsistence harvest opportunity,  
42 extending the deer hunting season for subsistence users  
43 in Unit 2 from August 1st to December 31, to July 24th  
44 to December 31st.

45  
46 Also in 2002 Craig Community  
47 Association and Klawock Cooperative Association  
48 submitted Wildlife Proposal 03-05 requesting to close  
49 Federal public lands in Unit 2 to the harvest of deer  
50

0010

1 by non-Federally qualified users from August 1st to  
2 September 1st and to reduce the harvest limit for  
3 non-Federally qualified users in Unit 2 to two bucks.  
4 This proposal was submitted to conserve the deer  
5 population and continue subsistence uses as the  
6 proponents noted increasing competition for a declining  
7 deer population.

8  
9 In the analysis of WP03-05, it was  
10 noted that August and November were generally the two  
11 months when the greatest amount of deer harvest took  
12 place in Unit 2. It was also noted that August was the  
13 preferred time for hunting by Ketchikan residents,  
14 followed by mid-October to late November. The  
15 Southeast Council supported this proposal with  
16 modification to establish a closure to non-Federally  
17 qualified users on the Federal lands of Unit 2 from  
18 August 1st to August 10th.

19  
20 The Board subsequently adopted this  
21 proposal with further modification, enacting a one-year  
22 closure to non-Federally qualified users hunting deer  
23 on Federal lands in Unit 2 from August 1 to August 21.  
24 The Board cited the need to continue subsistence uses  
25 of deer.

26  
27 The adoption of these two proposals was  
28 controversial and in 2004 a total of thirteen proposals  
29 were submitted by various stakeholders requesting to  
30 either maintain, enhance, reduce or rescind the  
31 regulatory changes adopted under WP03-04 and WP03-05.  
32 One of these proposals was submitted by the Southeast  
33 Council and requesting to maintain the season date  
34 extension and the early season closure.

35  
36 The Board subsequently adopted this  
37 proposal with the Southeast Council's modification to  
38 maintain the closure to non-Federally qualified users  
39 from August 1st to August 15th, citing the continuation  
40 of subsistence uses. And took no action on the other  
41 twelve proposals.

42  
43 In 2006 the Board adopted Proposal  
44 WP06-08 to exclude the southeastern portion of Prince  
45 of Wales Island from the Federal closure area to  
46 non-Federally qualified users in Unit 2. This decision  
47 made the closure more consistent with prior ADF&G  
48 recommendations and ensured opportunity for State  
49 residents as well as other hunters.

50

0011

1                   In 2015, the Craig Tribal Association  
2 submitted proposal WP16-01, requesting to limit  
3 non-Federally qualified users to the harvest of two  
4 deer on Federal public lands in Unit 2, and to extend  
5 the Federal deer season in Unit 2 to run through  
6 January 31. The outcome of this proposal was that the  
7 Board adopted WP16-01 with modification extending the  
8 deer season through January 31, but not enacting a  
9 reduction in harvest limit for non-Federally qualified  
10 users.

11  
12                   In 2017 the Southeast Council submitted  
13 proposal WP18-01, requesting that non-Federally  
14 qualified users be limited to the harvest of two bucks  
15 on Federal public lands in Unit 2, and that the season  
16 for non-Federally qualified users hunting in Unit 2 be  
17 reduced by a week or more.

18  
19                   The Southeast Council submitted this  
20 proposal after hearing extensive testimony from Prince  
21 of Wales Island residents that they were having to work  
22 harder to meet their subsistence needs for deer due to  
23 competition and changing habitat conditions.

24  
25                   The Council voted to support the  
26 harvest limit reduction for non-Federally qualified  
27 users but did not support the season length reduction.  
28 The Board adopted this proposal as modified by the  
29 Council, citing the continuation of subsistence uses as  
30 justification.

31  
32                   At its recent February 2025 regulatory  
33 meeting the Board adopted proposal NDP25-01, changing  
34 the status of Ketchikan to a rural community within the  
35 Federal Subsistence Management Program. Ketchikan  
36 residents were previously one of the key groups of  
37 non-federally qualified users hunting deer in Unit 2.

38  
39                   As you heard, Ketchikan residents are  
40 becoming Federally qualified users with a customary and  
41 traditional use determination for deer in Unit 2  
42 starting tomorrow. This change will increase the deer  
43 harvest limits and season length on Federal public  
44 lands in Unit 2 for all Ketchikan residents.

45  
46                   As a result at their March 2025  
47 meeting, the Southeast Council voted to submit the  
48 Wildlife Special Actions under consideration today as  
49 well as formal regulatory proposals requesting a  
50

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1 codified closure to deer hunting by non-federally  
2 qualified users on Federal public lands in Unit 2 and  
3 an .804 analysis for Federally qualified users. These  
4 proposals were submitted for the same reasons as the  
5 current special actions. Wildlife Proposal WP26-05,  
6 submitted by the Ketchikan Indian Community, also  
7 requests similar regulatory changes.

8

9 A public hearing on the Special Actions  
10 under consideration today took place in Klawock on May  
11 12th. About 68 people attended this hearing in person,  
12 online, or via phone. Nineteen attendees provided  
13 testimony. Testifiers in favor of WSA25-01 and WSA25-03  
14 noted that the Unit 2 deer population had declined in  
15 recent years due to several interrelated factors that  
16 included habitat loss associated with logging,  
17 predation by wolves and bears, and insufficient  
18 enforcement of hunting regulations.

19

20 As a result, it was becoming harder and  
21 more time consuming to harvest sufficient deer to meet  
22 local subsistence needs. Some of these testifiers noted  
23 that these issues would likely be compounded by  
24 Ketchikan's recent rural status change.

25

26 Those in favor of WSA25-03 specifically  
27 noted that local users should have priority in these  
28 situations. Testifiers who opposed WSA25-01 and  
29 WSA25-03 noted that there would be significant, broader  
30 economic impacts resulting from a full closure to a  
31 non-Federally qualified users and restrictions to  
32 non-local Federally qualified users in Unit 2 because  
33 many lodges, guides, outfitters and businesses depended  
34 on revenues from non-local clients.

35

36 Testifiers opposed to these Special  
37 Actions also noted that participation by non-local  
38 Federally qualified users had declined in recent years,  
39 that logging related habitat loss and closure of  
40 logging roads was the primary reason for declining  
41 access to Unit 2 deer populations and that predation by  
42 wolves and bears was the primary issue that needed to  
43 be addressed to help rebuild Unit 2 deer populations  
44 and improve hunter success.

45

46 They also noted that hunter competition  
47 and deer population issues were only a problem along  
48 the most accessible portions of the Prince of Wales  
49 road system but not elsewhere.

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1                   Logging, associated habitat loss, wolf  
2 and bear predation, hunting, and winter weather are the  
3 main factors impacting Unit 2 deer populations. Since  
4 1954 Prince of Wales has been the site of the most  
5 logging activity in the Southeast region. Logging in  
6 the area has substantially reduced the amount of old  
7 growth forest available for deer to utilize in the  
8 winter, substantially increased the amount of  
9 undesirable stem-exclusion stage forest, and led to an  
10 overall decrease in habitat connectivity.

11  
12                   Old-growth forests are considered the  
13 primary deer winter range in Southeast Alaska.  
14 However, ADF&G estimates that over 40 percent of the  
15 old growth forest once present in Unit 2 has been  
16 logged in the past 50 years, and that the lasting  
17 legacy of previous timber harvest will continue to have  
18 negative impacts on wildlife populations in this area.

19  
20                   In 1999 Hicks noted that as clear-cut  
21 logging continues to reduce old-growth habitat in  
22 portions of Unit 2, deer populations are expected to  
23 decline. Population models indicate declines in  
24 carrying capacity of 50 to 60 percent by the end of the  
25 logging rotation in 2054.

26  
27                   Long-term implications of habitat loss  
28 include the inability to provide for subsistence needs  
29 and the loss of deer hunting opportunities. U.S. Forest  
30 Service and ADF&G habitat models predict the forest's  
31 capacity to support deer in average winter conditions  
32 will decline by nearly half by the end of the logging  
33 rotation.

34  
35                   Because of the extensive loss of  
36 critical winter habitat in some areas, declines may  
37 substantially exceed 60 percent following severe  
38 winters. By 2054, we expect few areas will meet  
39 projected hunter demand within road accessible areas  
40 and logged portions of Unit 2.

41  
42                   More recently the U.S. Fish and  
43 Wildlife Service noted that habitat loss from past  
44 timber harvests in Unit 2 will result in a 21-33  
45 percent decline of the deer population over the next 30  
46 years, with future timber harvest exacerbating these  
47 declines.

48  
49                   Predation is also a factor affecting  
50

0014

1 the deer population in Unit 2. Black bears are known to  
2 target young fawns during the birthing season. Unit 2  
3 residents have also reported that deer abundance  
4 typically decreases as the density of wolves increases  
5 and that wolf trapping can increase the success rates  
6 of deer hunters in the area of trapping. High densities  
7 of these predators may reduce deer populations or  
8 increase the time needed for deer populations to  
9 recover after severe winters.

10

11 According to studies by Gilbert and  
12 Farmer hunting and malnutrition appear to be greater  
13 sources of deer mortality than predation by black bears  
14 and wolves.

15

16 Looking at population management and  
17 harvest history issues. Managing Sitka black-tailed  
18 deer and deer harvest is difficult because there are no  
19 methods to directly count deer in Southeast Alaska. The  
20 Alaska Department of Fish and Game and the U.S. Forest  
21 Service has long relied on indices such as deer pellet  
22 counts, aerial surveys, and harvest reporting data to  
23 assess deer population trends.

24

25 The Unit 2 deer population was roughly  
26 estimated at approximately 55,000 deer in previous  
27 reports in the early 2000's and the Alaska Board of  
28 Game currently has a population objective of 71,000  
29 deer for Unit 2 with a yearly harvest objective of  
30 2,700. However, deer pellet counts and aerial surveys  
31 were discontinued prior to 2020 in an effort to  
32 transition to more accurate estimation techniques.  
33 There are currently no population estimates available  
34 to conclusively determine if these population  
35 objectives are being met.

36

37 Currently, hunter self-reported harvest  
38 and effort information is the only quantitative index  
39 available to track deer population trends in Unit 2.  
40 However, hunter self-reported harvest and effort data  
41 should be interpreted cautiously as reporting rates are  
42 often too low to generate accurate statistical  
43 estimates and deer harvest is influenced by factors  
44 other than just deer abundance.

45

46 Southeast Council members have also  
47 noted that calculations of hunter effort and harvest  
48 success based on reporting data may be misleading  
49 because subsistence users often only document their  
50

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1 successful hunts. Additionally, ADF&G also believes  
2 that Unit 2 has one of the highest illegal and  
3 unreported harvests in the region and unreported  
4 harvest has previously been estimated to be equal to  
5 the Unit 2 reported harvest.

6  
7 So all of this is to say that there's  
8 uncertainty in the data and the Board should keep this  
9 in mind during their deliberations.

10

11 Between 1997 and 2023 an estimated  
12 average of 1,054 Federally qualified users and 954  
13 non-Federally qualified users harvested about 2,600  
14 deer each year from Unit 2. The estimated total harvest  
15 by all users in Unit 2 averaged about 2,200 deer per  
16 year from 1997 2005, then increased from 2006 to 2016,  
17 averaging about 3,500 deer per year, and peaking at  
18 historically high levels in 2015.

19

20 Unit 2 estimated deer harvest declined  
21 again more recently, averaging about 1,900 deer per  
22 year from 2017-2023. The lowest total estimated harvest  
23 during this twenty-seven-year period occurred in 2023  
24 and the second lowest total estimated harvest occurred  
25 in 2022. Total harvest increased somewhat during the  
26 most recent 2024 hunting season. This information is  
27 shown in more detail in Figures 2 and 3 on page 25 and  
28 Appendix A on page 86.

29

30 Overall there is a 45 percent reduction  
31 in average yearly harvest between the 2006-2016 and  
32 2017 2023 time periods. This difference in average  
33 yearly harvest is quite a bit smaller if you compare  
34 1997 2005 and 2017 2023. It's a reduction of about 12  
35 percent.

36

37 The recent decline in average yearly  
38 harvest also coincides with a similar decline in the  
39 average yearly number of hunters as well as declines in  
40 the average number of deer harvested per user and  
41 declines in hunter success rate for all users. The  
42 number of days reported hunted per successful deer  
43 harvested has also increased from both user groups in  
44 recent years.

45

46 While declining hunter numbers may  
47 partially explain decreases in harvest, increasing  
48 amounts of effort required to harvest fewer deer would  
49 seem to suggest a declining, or at least less  
50

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1 accessible, deer population which may be making it  
2 increasingly difficult and time-consuming for hunters  
3 to harvest sufficient deer to justify their efforts and  
4 expenditures.

5  
6 This could particularly be the case for  
7 an aging Prince of Wales population that must expend  
8 greater effort to hike through secondary growth forest  
9 to find deer. Observations and local knowledge shared  
10 by Southeast Council members and public testifiers at  
11 Southeast Council meetings also point to a declining or  
12 less accessible Unit 2 deer population.

13  
14 The two buck harvest limit for  
15 non-Federally qualified users that took effect in Unit  
16 2 in 2018 may have also reduced the overall harvest by  
17 non-Federally qualified users, but the extent of that  
18 change is unclear because participation in harvest by  
19 both non-Federally qualified users and Federally  
20 qualified users have followed a similar decreasing  
21 pattern since this time.

22  
23 Ketchikan residents were previously the  
24 primary group of non-Federally qualified users hunting  
25 deer in Unit 2, accounting for about 59 percent of all  
26 non-Federally qualified users and 69 percent of all  
27 non-Federally qualified users' harvests from 1997 to  
28 2023. But, like others, the number of Ketchikan  
29 residents hunting and harvesting deer in Unit 2 has  
30 decreased substantially in recent years.

31  
32 All right. Getting to the second half  
33 of this 03 portion of this analysis. An ANILCA Section  
34 804 analysis identifies which Federally qualified  
35 subsistence users should have a priority for the take  
36 of a limited resource in a particular area when it is  
37 determined that harvest restrictions are needed due to  
38 significant conservation concerns or the need to ensure  
39 the continuation of subsistence uses among a subset of  
40 users most dependent on the resource.

41  
42 So when we're asked to do this, we try  
43 to do this according to three criteria outlined in  
44 ANILCA Section .804 and that is customary and direct  
45 dependents on the resource as a mainstay of livelihood,  
46 local residency and proximity to the resource, and then  
47 availability of alternative resources.

48  
49 So the customary and traditional use  
50



0017

1 determination for deer in Unit 2 includes all rural  
2 residents of Units 1 through 5. So that means as of  
3 Friday there will be 33 rural communities throughout  
4 Southeast Alaska with customary and traditional use  
5 determinations for deer in Unit 2.

6  
7 So all 33 communities were included in  
8 this Section .804 analysis. Table 5 on page 29 shows  
9 recent population and economic information for each of  
10 these communities and it's organized by Wildlife  
11 Management Unit. It also provides an estimate of how  
12 far each community is from Unit 2.

13  
14 Due to general similarities in hunting  
15 patterns, proximity and, of course, the time  
16 constraints associated with this Special Action process  
17 OSM made final .804 priority recommendations on a  
18 Management Unit basis and did not provide more specific  
19 recommendations for individual communities within each  
20 Management Unit. That may be something we can go back  
21 and do for the formal proposals, but didn't really have  
22 time to get that detailed in it this time.

23  
24 So most of the deer harvest and hunter  
25 effort in Unit 2 is still attributable to hunters  
26 residing in closest proximity to the unit. From  
27 1997-2023 residents of Unit 2 and Unit 1A accounted for  
28 a combined average of 75 percent of all hunters and 83  
29 percent of all harvests taken from Unit 2 each year.  
30 Residents of Unit 2 accounted for the greatest overall  
31 number of hunters and harvests each year during this  
32 period.

33  
34 Residents of Unit 3 accounted for about  
35 5 percent of hunters and harvests taking place in Unit  
36 2 during this period. Residents of more distant  
37 communities in Units 1C, 1D, 4 and 5 combined to  
38 account for about 3 percent of all deer hunters and 3  
39 percent of all deer harvests in Unit 2 each year.

40  
41 It's important to note that rural  
42 residents of Units 1C, 1D, 4 and 5 did not gain  
43 customary and traditional use determinations for deer  
44 in Unit 2 until 2018, but residents of these units were  
45 still able to hunt deer in Unit 2 under State  
46 regulations before this time. So that information is  
47 broken down in more detail on Table 6 on pages 33 and  
48 34.

49  
50

0018

1                   Tables 7 and 8 on page 36 and 40 it  
2 shows the average estimated total pounds of subsistence  
3 resources harvested per person and each unit ranged  
4 from a high of 354 pounds in Unit 5 to a low of 163  
5 pounds in Unit 1A. However, in units where more than  
6 one comprehensive survey has been conducted, Units 4  
7 and 2 exhibited the highest average deer harvest per  
8 person and deer accounted for the greatest percentage  
9 of total subsistence harvest in these units.

10

11                   Unit 5 exhibited the lowest average  
12 deer harvest per person as moose are the primary large  
13 mammal species targeted in that area. On average,  
14 residents of communities in Units 2 and 4 generally  
15 used, harvested, successfully harvested, and shared  
16 deer at higher rates than residents of communities  
17 located in other units.

18

19                   Based upon these hunting patterns and  
20 issues of proximity Federally qualified users in Unit 2  
21 display the greatest degree of customary and direct  
22 dependents on Unit 2 deer. It's not exactly  
23 surprising. Followed by subsistence users in Units 1A  
24 and 3.

25

26                   Criterion 3 of the Section .804 process  
27 requires us to evaluate the availability of alternative  
28 resources. So in situations of resource shortages some  
29 communities have better access to alternative  
30 subsistence resources as well as store-bought foods and  
31 goods. This is an important consideration made during  
32 the ANILCA Section .804 process.

33

34                   Table 10 on page 59 provides a  
35 description of the current deer hunting opportunities  
36 available for Federally qualified users hunting under  
37 Federal subsistence regulations in Units 1 through 5.  
38 So this table is provided as a point of comparison for  
39 understanding rural residents ability to meet their  
40 needs for deer in their home units, as well as likely  
41 potential sources of additional deer and alternative  
42 wildlife resources.

43

44                   Unit 4 has the highest deer harvest  
45 limit provided under Federal Subsistence Regulations,  
46 followed by Unit 2, Unit 1C, 1A, and 1B. Units 3 and 5A  
47 currently have a deer harvest limit of only one buck  
48 per season, while there are no Federal open deer season  
49 in Unit 1D. Units 2 and 4 also had the fewest available  
50

0019

1 alternative wildlife resources to potentially offset a  
2 decline in deer harvest. Deer are the only large  
3 ungulate available in Unit 2.

4  
5 Unit 3 residents have a substantially  
6 lower deer harvest limit in their home unit. Unlike  
7 Unit 2 residents, they can also harvest moose and elk  
8 in Unit 3. Unit 3 residents also have a history of  
9 traveling to southern Admiralty Island in Unit 4 and  
10 parts of the mainland in Unit 1B to harvest deer. Unit  
11 1A residents may harvest four bucks in their home unit,  
12 as well as goat, moose, black bear. The residents of  
13 Unit 1A also have a history of traveling to Unit 2 to  
14 harvest deer.

15  
16 As noted earlier in the analysis, rural  
17 residents of more distant communities in Units 1C, 1D,  
18 4, and 5A have not exerted much deer hunting pressure  
19 in Unit 2 over the past several decades for which  
20 hunter harvest data has been collected.

21  
22 In this area Ketchikan functions as a  
23 regional hub in the southern portion of Southeast  
24 Alaska, and residents of Ketchikan and Saxman generally  
25 have greater access to commercial goods and services  
26 than their neighbors in Unit 2. Metlakatla residents  
27 also have easier access to Ketchikan than residents of  
28 Unit 2.

29  
30 Due to issues of proximity, many  
31 residents of Units 1C, 1D, 4, and 5 likely use Juneau  
32 as their regional hub. Likewise, residents of Unit 3  
33 may also use Juneau as a regional hub as much or more  
34 than Ketchikan.

35  
36 There are fewer grocery stores  
37 available in Units 2 or 3, and store-bought food  
38 options are generally more limited and more expensive  
39 than they are in the Ketchikan Gateway Borough.  
40 Households in Unit 2 have also exhibited some of the  
41 lowest average median incomes and highest poverty rates  
42 in the region over the past three census analysis  
43 periods.

44  
45 These economic factors suggest, taken  
46 together, that Unit 2 residents have less access to  
47 store-bought foods and related alternative economic  
48 resources than their neighbors, particularly those  
49 residing in the Ketchikan Gateway Borough.

50

0020

1                   So there are several alternative  
2 options for consideration that we outlined on pages 63  
3 and 64 of the analysis. I also come up with a couple  
4 other options after the analysis had already been sent  
5 for publication that I could discuss later if needed,  
6 but the Board may wish to consider these alternatives  
7 during their deliberations.

8  
9                   The OSM conclusion is to oppose  
10 WSA25-01 due to the existing closures and harvest limit  
11 restrictions already in codified regulations and to  
12 support WSA25-03 with modification to close only the  
13 northwestern portion of Prince of Wales Island from  
14 July 24th to August 15th to non-prioritized Federally  
15 qualified users and to reduce the non-prioritized  
16 Federally qualified user harvest limit to two bucks for  
17 the 2025/26 season.

18  
19                   This special action would become  
20 effective one day after the publication of the  
21 regulatory change in the Federal Register establishing  
22 Ketchikan as a rural community if it were to be  
23 adopted.

24  
25                   The justification. Deer are the most  
26 significant terrestrial source of meat for residents of  
27 the communities that compose Unit 2. Likewise, deer  
28 have consistently ranked as one of the top resources  
29 harvested, utilized, and shared by Unit 2 residents  
30 since harvest surveys began in the 1980s. Reduced  
31 access to deer can represent a substantial hardship for  
32 Unit 2 households with limited means to replace wild  
33 food harvests with expensive store-bought foods.

34  
35                   Many Unit 2 residents were already  
36 reporting that they were not meeting their subsistence  
37 needs for deer before Ketchikan's rural status change  
38 and recent harvest data indicate it is taking both  
39 Federally qualified and non-Federally qualified users  
40 longer to harvest fewer deer in Unit 2. Unit 2  
41 residents exhibit the greatest degree of customary and  
42 direct dependence on Unit 2 deer populations as a  
43 mainstay of livelihood.

44  
45                   Likewise, Unit 2 residents reside in  
46 closest proximity to Unit 2 deer populations and, on  
47 average, do not possess the same level of access to  
48 alternative resources as non-Federally qualified users  
49 residing in urban areas and nearby Federally qualified  
50

0021

1 users residing in Units 1A and 3. Federally qualified  
2 users residing in Units 1C, 1D, 4, and 5 have exhibited  
3 relatively limited deer hunting and harvest in Unit 2  
4 since this data began being collected.

5

6 According to the criteria provided in  
7 ANILCA Section .804 Unit 2 residents should have  
8 priority access to Unit 2 deer in situations where it  
9 is deemed necessary to restrict other users taking of  
10 this population due to substantial conservation  
11 concerns and/or the need to continue subsistence uses.

12

13 Given the subsistence priority mandated  
14 by ANILCA, closures or restrictions to non-Federally  
15 qualified users should be implemented before closures  
16 or restrictions to Federally qualified subsistence  
17 users may be implemented. However, Ketchikan's recent  
18 rural status change presents a unique circumstance in  
19 which to apply this consideration, as Ketchikan  
20 residents previously accounted for the majority of non-  
21 Federally qualified users hunting deer in Unit 2.

22

23 The 2003 August closure and 2018  
24 harvest limit restrictions implemented for non-  
25 Federally qualified users were primarily intended to  
26 limit Ketchikan residents' harvest of Unit 2 deer, and  
27 thereby help conserve the Unit 2 deer population and  
28 continue subsistence uses of that population.

29

30 Because the current customary and  
31 traditional use determination for deer in Units 1-5 is  
32 written to be inclusive of all rural residents,  
33 Ketchikan residents will be able to immediately harvest  
34 deer in Unit 2 under Federal regulations once they are  
35 listed as rural in the Federal Register.

36

37 As a result, any regulation intended to  
38 continue limiting Ketchikan residents' harvest of Unit  
39 2 deer for the purposes of conservation or the  
40 continuation of subsistence uses, should restrict non-  
41 Federally qualified users before restricting a subset  
42 of Federally qualified users through the ANILCA Section  
43 .804 process. However, non-Federally qualified users  
44 are already restricted in codified regulations.

45

46 The long-term trend of declining deer  
47 habitat, decreasing or less accessible deer populations  
48 and high hunter competition in the most road-accessible  
49 portions of Unit 2 warrants adopting Special Action

50

0022

1 WSA25-03 with modification. However, restricting  
2 non-Federally qualified users and non-prioritized  
3 Federally qualified users to the degree requested by  
4 the proponents is not necessary, as most of the hunting  
5 pressure on Unit 2 is concentrated along roads and near  
6 communities in the area of the current early season  
7 closure to non-Federally qualified users.

8  
9 The OSM modification represents a  
10 meaningful compromise intended to maintain a healthy  
11 Unit 2 population while ensuring the continuation of  
12 subsistence uses by Federally qualified subsistence  
13 users residing in Unit 2 without completely closing or  
14 unnecessarily restricting non-local hunting  
15 opportunities.

16  
17 Under the OSM modification, non-  
18 Federally qualified users will still be able to harvest  
19 two bucks in Unit 2 following the early season closure  
20 in August. Non-prioritized Federally qualified users  
21 who reside in Units 1, 3, 4, and 5 will also be able to  
22 harvest two bucks, as well as hunt during the  
23 Federal-only January season.

24  
25 This January season will provide some  
26 level of subsistence priority for these non-prioritized  
27 Federally qualified users. All of these measures will  
28 be re-evaluated following the 2025/26 regulatory year  
29 through several 2026 wildlife proposals that are  
30 requesting codified changes similar to those examined  
31 in this analysis.

32  
33 The Board maintained the current early  
34 season closure and harvest restrictions for non-  
35 Federally qualified users hunting in Unit 2 in 2022 and  
36 OSM's recommendation on the current review of that  
37 closure is also to maintain these restrictions.  
38 However, the benefits of these restrictions in terms of  
39 maintaining a healthy Unit 2 deer population and  
40 ensuring the continuation of local subsistence uses  
41 will be functionally stymied as they primarily targeted  
42 Ketchikan residents who will become Federally qualified  
43 subsistence users on Friday.

44  
45 Ketchikan obtaining rural status  
46 triggered the submission of these special action  
47 requests. Additionally, Ketchikan Indian Community, the  
48 proponent of the rural status change, agreed that they  
49 would support necessary .804 restrictions if Ketchikan  
50

0023

1 gained rural status, particularly for Unit 2 deer.

2

3

4 Several Board members also suggested  
5 that an .804 subsistence user prioritization would be  
6 an appropriate and effective measure to deal with the  
7 potential negative impacts that Ketchikan's change in  
8 rural status could have on local subsistence resources  
9 and the continuation of subsistence uses, particularly  
10 Unit 2 deer.

10

11

12

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49

50

KIC recently submitted Proposal  
WP26-05, requesting similar actions to address this  
issue. However, this proposal cannot be effectuated  
until the 2026 regulatory year. If adopted, WSA25-03  
as modified by OSM could remain in effect no longer  
than the end of the current regulatory cycle.

In the future it may be necessary to  
consider whether longer term harvest restrictions such  
as reductions in harvest limits for local subsistence  
users and/or the elimination of doe harvests will be  
required for the conservation of Unit 2 deer  
populations and the continuation of the subsistence  
uses of these deer by those most dependent on them.

Overall, data presented in this  
analysis suggests that finding deer in traditional  
hunting areas has become difficult due to  
logging-related reductions in deer habitat and  
associated population declines, predation, high levels  
of competition in the most accessible hunting areas,  
generally wetter and less predictable weather, and  
declining road access.

Deer habitat and deer populations on  
Prince of Wales Island will likely continue to be  
impacted by the legacy of logging for the next several  
decades.

So that concludes my lengthy  
presentation and I can answer any questions if you have  
them.

MADAME CHAIR PITKA: Thank you very  
much, Mr. Roberts. Does anybody have any questions at  
this time. Board members.

MS. BOARIO: Madame Chair. Fish and  
Wildlife Service.

0024

1 MADAME CHAIR PITKA: Yes. Please go  
2 ahead.

3  
4 MS. BOARIO: Thank you, Madame Chair.  
5 Thank you, Jason. I'm hoping you can help me make sure  
6 I'm reading this correctly. On page 24 of the analysis  
7 there's a full paragraph there at the top talking about  
8 that Ketchikan residents make up about 44 percent of  
9 the NFQU deer hunters and I see a little bit more of  
10 the harvest over the last couple years.

11  
12 Do you have a sense -- can OSM clarify  
13 where the remainder of the NFQUs are coming from  
14 generally? And I just want to confirm that those  
15 non-Ketchikan NFQUs would still be unable to hunt under  
16 the current closure in Unit 2 from August 1 to 15,  
17 correct?

18  
19 MR. ROBERTS: Okay. So let me start  
20 with your first question. You'll have to repeat the  
21 second one because I was thinking while you were  
22 talking. So if you look at Table 6 it breaks down  
23 where the other non-Federally qualified users hunting  
24 in Unit 2 are coming from.

25  
26 So users from Ketchikan make up the  
27 majority of those at least in the past non-Federally  
28 qualified users, but you also have, depending on the  
29 time period, users from Unit 6, Unit 8, 14(c), other  
30 places in Alaska and then residents from the Lower 48  
31 making up the remainder.

32  
33 So I believe on Page 33 we talk about  
34 that in a bit more detail. Non-Federally qualified  
35 users from outside Units 1 through 5 accounted for a  
36 combined average about 16 percent of all hunters and 9  
37 percent of all harvest taking place in Unit 2 on  
38 average for that whole 1997 to 2023 period.

39  
40 So I think your second question was if  
41 the remaining non-Federally qualified users outside of  
42 the Ketchikan residents who are becoming Federally  
43 qualified would still be subject to that early season  
44 closure and harvest restriction. That would be yes.

45  
46 MS. BOARIO: Thank you. Yeah. I just  
47 was -- there were a number of different numbers and  
48 different places and I'm just -- here it says they're  
49 accounting for about 44 percent, which means there's  
50



0025

1 more than 50 percent of those NFQU deer hunters coming  
2 from elsewhere. That's all I was trying to understand.

3

4 MR. ROBERTS: Yeah, I'd have to look.  
5 That may be more recent average. What page were you on  
6 again, 24?

7

8 MS. BOARIO: 24. And I believe it's  
9 correspondence. It's like with Churchwell, which I  
10 think -- and maybe when the State testifies they might  
11 be able to speak to it more too. I think it looks like  
12 that's someone from Fish and Game. So I was just  
13 making sure I was reading that correctly and  
14 understanding the implications.

15

16 Thank you, Jason. Sorry. I know  
17 there's a lot packed in here.

18

19 MR. ROBERTS: Yeah. So that is for  
20 2018-2023 that Ketchikan hunters accounted for 44  
21 percent. So that's not the whole time period. It's  
22 more recent.

23

24 MS. BOARIO: Yeah. Thank you.

25

26 MR. ROBERTS: Yep.

27

28 UNIDENTIFIED SPEAKER: Are non-Board  
29 members allowed to comment or ask questions now?

30

31 MADAME CHAIR PITKA: No, this time is  
32 reserved for Board members. My apologies. Do any  
33 Board members have any questions on the analysis?

34

35 MR. ALBERG: No questions from Park  
36 Service.

37

38 MADAME CHAIR PITKA: I thank you for  
39 your questions, Member Boario. And thank you for the  
40 presentation and the answers. Now we'd like to move on  
41 to the summary of Tribal Consultation with Mr. Orville  
42 Lind.

43

44 MR. LIND: Thank you, Madame Chair.  
45 How am I coming in? Loud and clear?

46

47 MADAME CHAIR PITKA: Loud and clear.  
48 Thank you very much.

49

50

0026

1 MR. LIND: Good afternoon, Board  
2 members, delegates and public members. My name is  
3 Orville Lind. I'm the Native Liaison for the Office of  
4 Subsistence Management. I'm here to give you the  
5 summary of the tribal consultation held in person in  
6 the community of Hydaburg, which was a great  
7 experience.

8  
9 We don't normally get to do that and we  
10 never get to respond to the request to have  
11 consultations in person. So that was a real good one.  
12 It was an honor to be with residents of Craig and  
13 Klawock and Ketchikan. We actually had one person  
14 online calling in from the Tlingit and Haida Council.  
15 We had two representatives from Hydaburg that were  
16 there and representatives from Ketchikan Indian  
17 Community, like I said, and Kasaan and the Craig Tribal  
18 Chief was actually there.

19  
20 I also attended a public hearing a  
21 couple days before which a lot of folks showed up. Got  
22 to meet a lot of people so connections were made.  
23 Anyway, for the summary there was -- a Ketchikan Indian  
24 Community representative stated that there should be  
25 further consultation in Ketchikan for any actions  
26 involving restricting subsistence rights and that  
27 Ketchikan Indian Community would appeal to the  
28 Department of Interior or USDA if no consultation and  
29 further restrictions that would occur.

30  
31 They supported -- they were in  
32 opposition, I'm sorry, of Wildlife Special Action  
33 25-01.

34  
35 As we go to the Kasaan representative  
36 he was in support of Wildlife Special Action 01 and 03.

37  
38 The Craig Tribal Chief was in support  
39 of Special Action 25-01 and shared also that the tribes  
40 in Unit 2 that rely on deer deer are concerned that the  
41 deer population is in decline. They were also in  
42 support of Wildlife Special Action 25-03. Noting that  
43 they are concerned about the potential impacts of the  
44 influx of newly Federal qualified hunters from  
45 Ketchikan on Unit 2 deer populations and local harvest  
46 opportunities.

47  
48 The Craig tribe also asked for further  
49 consultation with the Federal Subsistence Board on  
50

0027

1 Prince of Wales Island. The Craig tribe also stated  
2 that Special Action 25-01 has nothing to do with  
3 physical responsibilities of guiding businesses. It  
4 has everything to do with protecting subsistence use  
5 and populations. The tribe also noted that closing  
6 Federal lands in Unit 2 would not completely restrict  
7 non-local hunting in Unit 2 because there are private  
8 and corporate lands that would continue to allow  
9 hunting there.

10

11 We also had another representative from  
12 Craig in support of 01 and 03. Supports the Federal  
13 Subsistence Board closing the 25-26 year season to  
14 non-Federal qualified users. He also stated that there  
15 was a 50 percent decline in deer population due to  
16 habitat loss and predation.

17

18 Elders from Craig said they are having  
19 to travel further and work harder to get fewer deer.  
20 He also stated that Ketchikan gained rural status  
21 before the end of the Unit 2 deer noting that  
22 harvesting does -- is a traditional practice on Prince  
23 of Wales Island. Restricting doe harvest may  
24 necessarily be for conservation and current  
25 circumstances.

26

27 Again, the Craig representative was in  
28 favor of supporting 01 and 03 with modification to  
29 maintain four bucks/one doe for Prince of Wales  
30 residents, two bucks for non-local Federal qualified  
31 users and one buck for non-Federal qualified users.

32

33 He shared that these proposals are  
34 supported by the Traditional Ecological Knowledge  
35 harvest data, the data on the habitat and they said  
36 that Craig Tribe wanted to hold a  
37 government-to-government consultation in Craig so that  
38 the Office of Subsistence Management and the Federal  
39 Subsistence Board would gather further TEK or  
40 Traditional Ecological Knowledge from elders who could  
41 not make the meeting in Hydaburg.

42

43 He believes that there will be a  
44 significant influx of hunters from Ketchikan coming to  
45 hunt deer under Federal subsistence regulations in Unit  
46 2 now if Ketchikan has rural status. He opposed KIC's  
47 tactic of talking about the rural determination and  
48 rights as newly rural communities.

49

50

0028

1 I'm sorry. Let me go back. He believes  
2 that there will be a significant influx of hunters from  
3 Ketchikan coming to hunt deer under Federal subsistence  
4 regulations in Unit 2 now that Ketchikan has -- becomes  
5 rural status. He opposes KIC's tactic of talking about  
6 the rural determination and their rights as a newly  
7 rural community and focus a special action just on the  
8 Unit 2 deer population and the need to conserve that  
9 population and maintain subsistence priorities for the  
10 Unit 2 residents who are most dependent on it.

11  
12 So, to recap quickly, for Wildlife  
13 Special Action 25-01 and 03 the Ketchikan Indian  
14 Community opposes 03. Kasaan supported 01 and 03. The  
15 tribal representatives support 01 and 03. That  
16 concludes the summary for Wildlife Special Action 01  
17 and 03.

18  
19 Thank you, Madame.

20  
21 MADAME CHAIR PITKA: Thank you very  
22 much, Mr. Lind. Does anybody have any questions on the  
23 tribal consultation.

24  
25 (No response)

26  
27 MADAME CHAIR PITKA: Okay. Hearing no  
28 questions.....

29  
30 MR. LIND: Thank you.

31  
32 MADAME CHAIR PITKA: .....I'd like to  
33 open the floor to tribes and ANCSA corporation  
34 testimony at this time. Any individual authorized to  
35 speak on behalf of their tribe or ANCSA corporation.  
36 \*5 to raise or lower your hands. \*6 to mute and unmute  
37 your phone. Thank you.

38  
39 MS. BURNS: Chairwoman Pitka.

40  
41 MADAME CHAIR PITKA: Yes.

42  
43 MS. BURNS: Ketchikan Indian Community  
44 would like to give remarks when it's appropriate.

45  
46 MADAME CHAIR PITKA: Yes. You may do  
47 so right now. Thank you.

48  
49 MS. BURNS: Thank you. (In Haida)

50

0029

1 Dolores Churchill (in Haida) Illoxilee Stang Gloria (in  
2 Haida). First I want to thank this Board for righting  
3 a terrible wrong that was placed upon my community with  
4 ANILCA and having us having been left out of the  
5 Federally qualified users. It's really exciting. I  
6 think I cried again when I heard that it was going to  
7 be published in the registry.

8  
9 My name is -- my English name is Gloria  
10 Burns. I am the president of Ketchikan Indian  
11 Community. I have spoken before all of you in person  
12 before. I wanted to give a few remarks of course here  
13 as the official representative of Ketchikan Indian  
14 Community where a sovereign tribal government whose  
15 citizens have lived, hunted, fished and gathered across  
16 this region since time immemorial. We are not  
17 stakeholders, we are not user groups. We're indigenous  
18 stewards and sovereign rights holders.

19  
20 We want to assert clearly subsistence  
21 is not a favor. It is a protected right recognized  
22 under ANILCA and rooted in our tribal sovereignty. We  
23 want to be very clear that we represent the indigenous  
24 people of our area and we consider many or all of these  
25 areas we are talking about today as traditional hunting  
26 and fishing areas of our people.

27  
28 We also respect that they are the  
29 traditional hunting and fishing areas of other tribes  
30 and indigenous people. As such we are willing to  
31 accept and support their needs to protect their food  
32 source and to conserve their natural resources in this  
33 area. So when Craig Tribal came to us and had a  
34 conversation about the hardship that their elders are  
35 having accessing food because of a lack of being able  
36 to get off that road system, we of course spoke with  
37 them.

38  
39 So it's been very hard to separate  
40 ourselves from some of the derogatory and  
41 confrontational language that we tend to feel is coming  
42 out of the RAC and that Ketchikan is bad for  
43 everybody's conversation. At the same time we want our  
44 family on Prince of Wales to be able to eat and we want  
45 to be able to eat as well.

46  
47 I want to say before I go on with the  
48 rest of my remarks a couple of things that struck me  
49 was that because there is -- that it's going down and  
50

0030

1 people are having a hard time. We really want you to  
2 -- Ketchikan Indian Community has the largest elder  
3 growing population of any tribe in the state of Alaska.  
4

5 So if Craig and Prince of Wales are  
6 saying, hey, wait a second, our elders are having a  
7 hard time accessing their foods, that should be  
8 forefront of all of our minds whether or not we're  
9 indigenous or not that those folks are going to  
10 struggle.  
11

12 I want to say that the men in my family  
13 don't hunt off a road. They're young and they have  
14 capability, so they go off the road and they go off the  
15 road for a very long time to get what we need to feed  
16 our family. The same way when my family used to  
17 harvest cedar bark. We don't harvest off the side of  
18 the road. We go very far in because you leave those  
19 resources to those who are less able because we take  
20 care of each other.  
21

22 I just want to put in people's minds as  
23 we think about who really can access what's going on.  
24 By a vote of the Council we did put in a proposal that  
25 very much mirrored Craig. Because when we were going  
26 down this path of rural status, which is a fight that's  
27 been fought many times since ANILCA. The right to have  
28 our area back, not to have governmental genocide by  
29 denying us of our food and our connection to the land.  
30

31 We really understood the fear of our  
32 loved ones who are just trying to feed themselves. So  
33 while we know that we're over there hunting and fishing  
34 in those same areas we're trying to find a way to  
35 support those qualified users before anybody else  
36 because subsistence is not -- it's a right. It's a way  
37 of being. It's who we are. The Tongass is us and we  
38 are the Tongass and we have to take care of those  
39 things.  
40

41 So we did put on the record that we  
42 supported Craig's proposal separate of all the -- you  
43 know, the stuff everybody else is saying and the way it  
44 feels like it's trying to be used to circumvent the  
45 decision to make us qualified Federal users. But we  
46 support that idea that an .804 in theory, when the  
47 appropriate analysis is done because a fundamental  
48 human right is the right to feed yourself.  
49  
50

0031

1 I want to go on the record and say  
2 something. Just because there is a store in Ketchikan  
3 doesn't mean my people are eating meat. They're eating  
4 Top Ramen when they can't access their fish and their  
5 deer meat. So I want to say like this idea that  
6 somehow the people in my area who are Native are  
7 accessing this food at a store at a greater rate than  
8 somebody on Prince of Wales is I believe absolutely  
9 false.

10  
11 People on Prince of Wales are paying  
12 money to get on a boat to come over here and shop here.  
13 Meanwhile we have not grown in income, we have not  
14 grown in population the size which we all presented  
15 when we became (indiscernible). I just have to say  
16 that.

17  
18 We respect OSM's recommendations and we  
19 understand the careful reasoning behind each of it, but  
20 we also want to affirm our position as right holders,  
21 not stakeholders. We do think that we have to create a  
22 system or be ready to move nimbly when people's access  
23 to their traditional and customary food is in jeopardy.  
24 We're very concerned that the data is not accurate.

25  
26 I think that one of the things that  
27 we're going to find is that the people from Ketchikan  
28 have been hunting the way they always hunt in the  
29 places that they always hunt. They're just not  
30 reporting it because they still have to feed their  
31 families.

32  
33 So when we're looking at how many deer  
34 are being taken I think that a lot more has to be  
35 invested into making sure to take care of that. You  
36 know, my area and my family, it's not customary to take  
37 a doe ever. My grandmother ate her first doe at 96 I  
38 think two weeks ago. She said, gee, this is so soft.  
39 I've never had a doe before. She had never eaten from  
40 a doe before. That was what somebody had brought her  
41 from Prince of Wales.

42  
43 I want to say that we supported 1 and 2  
44 by a vote of Council because we really want to say that  
45 subsistence rights have to be first. I also said when  
46 I was in Klawock that we're not particularly interested  
47 in weighing in and creating an economic downturn for  
48 the people at Prince of Wales, so we wanted to be  
49 careful how we said that.

50

0032

1                   The reality is I look at the fish  
2 collapses in other places and whatnot. I don't want  
3 our relations in Prince of Wales or ourselves, who are  
4 going to be in the registry tomorrow, to be worried  
5 about that. We support the idea of the .804 -- excuse  
6 me, is it .801 or .804? .804. Because we intend to  
7 take advantage of that here in Ketchikan when should  
8 something come about to jeopardize our ability to  
9 access our traditional foods.

10  
11                   So one of the concerns though was that  
12 the way it was put together it almost felt like it was  
13 like approve this and we can prove that Ketchikan  
14 really isn't rural. So, of course, we support -- well,  
15 we support it in theory and by resolution we said we  
16 support the idea of an .804 analysis and if the .804  
17 analysis justifies a closure, then of course we support  
18 it.

19  
20                   I think that based upon the previous  
21 data there's some conversation amongst leadership  
22 wondering how clear that is. But according to  
23 resolution we do support an .804 and the carve-out  
24 seems to be a reasonable compromise knowing that it is  
25 only going to be really for this timeframe and it will  
26 be re-evaluated -- when?

27  
28                   UNIDENTIFIED SPEAKER: August.

29  
30                   MS. BURNS: In August I believe. So I  
31 wanted to -- I just really wanted to emphasize that  
32 just because there is a grocery store doesn't mean  
33 you're not lactose intolerant, wheat intolerant, unable  
34 to eat red meat. (Indiscernible) sitting with me right  
35 now she can't eat anything but deer meat. She can't --  
36 she can't eat any other meat. Her body wasn't prepared  
37 to do that. Our bodies are made differently.

38  
39                   So for me I can't get past this real  
40 frustration I had where it almost felt like we were  
41 trying our rural status by just some of the  
42 conversation that happened.

43  
44                   I want to remind everybody too on the  
45 record that Ketchikan Indian Community is a landless  
46 community which meanwhile everybody else got their  
47 settlement for ANCSA except for our five communities.  
48 We never received the economic benefits of a  
49 corporation that could provide extra money. At the  
50



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1 same time our ability -- our wages didn't go up. Our  
2 population remains stagnant and we have no access  
3 legally to our food. So we're so excited about that.  
4 We're so encouraged by that.

5

6 So while I'm speaking with passion we  
7 do support -- we do support Prince of Wales' ability to  
8 make that determination to feed their own people. I  
9 had a bunch of other things to say, but I just got so  
10 frustrated by this idea that somehow because there's a  
11 grocery store on here that I'm not seeing people starve  
12 that I kind of went off track.

13

14 I want to say that our relationship  
15 with the land pre-dates Statehood, codified regulation,  
16 agency rulemaking. We do not need to be told we are  
17 rural. We have always been rural and we have always  
18 been here. We unequivocally will -- now that we sit on  
19 this Fed -- well, tomorrow we'll sit on this Federal  
20 registry to have what should never have been taken from  
21 us restored.

22

23 We will fight tooth and nail to make  
24 sure that that never goes away, but we're never going  
25 to be -- we're never -- it is not the intention of this  
26 tribal council to ever take food out of the mouths of  
27 our relatives in Klawock and (indiscernible) and  
28 (indiscernible) and Gusta Ann (ph). So we know that in  
29 a food crisis they need to be priority because their  
30 mouths are closest. They're going to feel it the most.

31

32 Haw'aa.

33

34 MADAME CHAIR PITKA: Thank you.

35

36 MS. BURNS: After me I was wondering if  
37 Charles Edwardson, who sits on the council, could go  
38 after. Just know that I'm the official statement.

39

40 MADAME CHAIR PITKA: Yes, he can.

41 Thank you.

42

43 MS. BURNS: Thank you.

44

45 MADAME CHAIR PITKA: I appreciate your  
46 comments.

47

48 MR. EDWARDSON: Thank you, everyone.  
49 Charles Edwardson, Tribal Council member for Ketchikan  
50

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1 Indian Community. During discussions for many, many  
2 months and many, many years a lot of the arguments we  
3 heard either for or against our rural status have been  
4 heard.

5  
6 In one fashion or another in multiple  
7 meetings, multiple hearings, public testimonies have  
8 ultimately led to a 7-3 decision by the Federal  
9 Subsistence Board in favor of our rural status, which  
10 we fully support, of course. When they made that  
11 decision there was no special rules considered in their  
12 decision. All of these arguments about access to  
13 grocery stores and things of that nature have been  
14 made, considered, weighed very carefully and a 7-3  
15 decision was the result.

16  
17 Though we accept this outcome and the  
18 LSM's great work, we emphasize that our right to  
19 self-determination and access to traditional territory  
20 remains undiminished. I believe our president had  
21 stated that earlier.

22  
23 I would like to reemphasize because our  
24 support is contingent upon us getting in the Federal  
25 Registry before any actions are taken that will affect  
26 Ketchikan Indian Community and our rural residents'  
27 access to traditional and customary foods. We need to  
28 make that really clear. It's contingent upon us being  
29 in the Federal Registry. Our support comes by a full  
30 council vote.

31  
32 This is some really great work by the  
33 OSM and the FSB and we do respect the rights and the  
34 opinions of the RAC. We are just on the opposite side.  
35 It's not that we don't respect their work or them.

36  
37 With all that said we do have a final  
38 remark and this will be for the record. KIC is a  
39 sovereign tribal nation and our relationship with these  
40 lands does not begin or end with Federal designation.  
41 Our relationship with the land predates Statehood,  
42 codified regulations and agency rulemaking. We do not  
43 need to be told we're rural. We've always been rural.

44  
45 Again, our president has touched on all  
46 this, but I wanted to emphasize therefore we state  
47 unequivocally if any special rules, conditions or  
48 constraints are imposed uniquely on KIC or Ketchikan's  
49 residents following a rural status designation, the  
50

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1 rules not applied equally to other rural communities,  
2 KIC will challenge them under Federal law and invoke  
3 all appropriate administrative and legal remedies. Our  
4 tribal sovereignty for traditional and customary use  
5 access and similar rights are not negotiable.  
6

7 We appreciate OSM's balanced review of  
8 these proposals and thank the Board for its continued  
9 attention to this issue. Our tribal council thanks  
10 you, OSM staff for their professionalism and analysis  
11 and express appreciation to the Board for its time and  
12 service.  
13

14 I would like to say with the 7-3 of the  
15 Federal Subsistence Board decision immediately after  
16 that the RAC came forward with these proposals, 1, 2  
17 and 3. That was what we felt that was retaliative. I  
18 know it was regulatory nature, I know it was their job,  
19 but as a tribe we felt singled out, as we still do,  
20 with this I think unhealthy obsession with Ketchikan by  
21 the RAC and it's just got to stop.  
22

23 That's what I'll say. We appreciate  
24 your time and we look forward to the rest of the  
25 proceedings. These are well thought out and are  
26 supported. We just wanted to get a few things off our  
27 chest so we tend to get passionately at times, but wish  
28 everybody a great day.  
29

30 Thank you.  
31

32 MADAME CHAIR PITKA: Thank you very  
33 much, Mr. Edwardson. I appreciate your comments. I'm  
34 having difficulty seeing raised hands right now.  
35 Robbin, can you help me out, please.  
36

37 MS. LAVINE: Certainly. For those of  
38 you who are joining by phone you can raise your hand by  
39 pressing \*5. So raise your hand by pressing \*5. I  
40 would also note that I think we are still looking for  
41 those official representatives of tribes and ANCSA  
42 corporations. So if you are a representative of your  
43 tribe or your ANCSA corporation and you have some  
44 comments to share, you can raise your hand on Teams or  
45 by pressing \*5.  
46

47 I see we do have a hand raised. The  
48 last four digits of your number is 0207. Please  
49 address the Board.  
50

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1 MR. HERNANDEZ: Thank you. That was  
2 me, Don Hernandez. Can you hear me okay?

3  
4 MADAME CHAIR PITKA: Yes, Mr.  
5 Hernandez. Are you representing a tribe right now?

6  
7 MR. HERNANDEZ: No, I'm not  
8 representing a tribe, but I do want to testify as an  
9 individual.

10  
11 MADAME CHAIR PITKA: Oh, okay. We'll  
12 take your testimony when we come to public testimony.  
13 I'll write you down, okay, thank you.

14  
15 MR. HERNANDEZ: Okay. Thank you,  
16 Rhonda.

17  
18 MADAME CHAIR PITKA: Okay. Tribal and  
19 ANCSA corporation testimony. I'm seeing a number of  
20 people on here, but I'm not sure who to go to next.

21  
22 MS. LAVINE: Once again if you are an  
23 official representative of a tribe or ANCSA  
24 corporation, you can raise your hand on teams or by  
25 pressing \*5 on your phone. Madame Chair, I see no more  
26 raised hands.

27  
28 MADAME CHAIR PITKA: Okay. Thank you.  
29 I'd like to thank Ketchikan Indian Community for their  
30 comments today. At this time I'd like to open the  
31 floor to public testimony. Mr. Hernandez, would you  
32 like to testify now?

33  
34 MR. HERNANDEZ: Yes. Yeah, that would  
35 be fine.

36  
37 MADAME CHAIR PITKA: Please go ahead.  
38 Thank you.

39  
40 MR. HERNANDEZ: Okay. As I said, my  
41 name is Don Hernandez and I am the Chair of the  
42 Southeast RAC and I understand there will be an  
43 opportunity for the RAC Chair to get involved in the  
44 discussion later.

45  
46 I do want to give some personal  
47 testimony and I want to preface that by saying that the  
48 RAC has not really had an opportunity to have a  
49 thorough discussion on these Special Action Requests,  
50

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1 so I don't really think it's appropriate for me as the  
2 RAC Chair to give too much in the way of comments on  
3 the Special Action Request.  
4

5                   However, later on in the discussion if  
6 you want to have some maybe background information of  
7 what the Council has done leading up to this point,  
8 then I might be able to provide that. I just want to  
9 stress that the Council has not really come to any kind  
10 of discussion or conclusion on these requests at this  
11 time.  
12

13                   We will obviously be engaged in that  
14 during the proposal process in our October meeting  
15 where we have, you know, sister proposals kind of  
16 nearing some of these requests as well as other  
17 proposals from other entities that will be deliberating  
18 on at that time. So those are my personal observations  
19 as a long-time resident and subsistence harvester on  
20 Prince of Wales Island.  
21

22                   I would like to commend the staff on  
23 being able to put together such a thorough analysis of  
24 these requests in a relative short period of time. I  
25 think they really did an excellent job there. However,  
26 I do disagree with their recommendations.  
27

28                   So on the first Special Action Request,  
29 which is the closure to non-subsistence users I  
30 disagree with their conclusion to oppose that. I base  
31 that on a number of different factors. Some of what  
32 I'm basing that on comes from the analysis itself and  
33 also I attended the public hearing in Klawock and I  
34 also listened in to the Tribal Consultation from  
35 Hydaburg and some of the issues that were brought  
36 forward then I think are significant.  
37

38                   Now that Ketchikan is going to be  
39 designated as rural the non-Federally qualified users  
40 are going to be primarily non-residents to Alaska. At  
41 the public hearing in Klawock I was a bit surprised to  
42 hear the number of businesses, lodges and whatnot who  
43 were opposed to this Special Action Request, a closure  
44 to non-Federally qualified.  
45

46                   What surprised me was I didn't really  
47 realize that there were so many operations starting to  
48 happen here on Prince of Wales Island. In looking  
49 through the analysis I saw that the number of  
50

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1 non-resident hunters now outnumber the number of  
2 hunters from both Wrangell and Petersburg who are  
3 traditional users of this unit, Unit 2.

4  
5 I also see that that component of  
6 non-resident hunters, which is taking advantage of the  
7 opportunities that are being offered by these -- I  
8 won't call them guiding operations. They're  
9 outfitters. They're people that, you know, provide a  
10 place to sleep and some form of transportation for  
11 hunters and we've all witnessed the explosive growth of  
12 that component industry in our fishing operations. Now  
13 obviously these businesses are trying to extend their  
14 seasons by offering hunting opportunities.

15  
16 Whereas we see some declining uses by  
17 subsistence hunters in Unit 2, both locals and from  
18 Ketchikan, who are now going to be subsistence hunters.  
19 The non-resident outfitted hunters is increasing and  
20 has potential for tremendous increase in the future. I  
21 see that as an issue that needs to be addressed. Now  
22 that we are entering into this .804 prioritization I  
23 think it's time to address that.

24  
25 Another important factor that was  
26 brought out both from the analysis and in the -- I  
27 heard this in the Tribal Consultation in Hydaburg. The  
28 analysis shows that fully 22 percent of Unit 2 is  
29 non-Federal lands. That's almost a quarter of the land  
30 in Unit 2 that is not under Federal management. It's  
31 private and State lands. I don't know the exact  
32 number, but I think it amounts to hundreds of thousands  
33 of acres. So those lands are not going to be subject  
34 to Federal management. No subsistence priority.  
35 You're under State management.

36  
37 And then at the Tribal Consultation it  
38 was brought out by one of the tribal entities that,  
39 yeah, maybe we ought to be taking a look at the  
40 opportunities for non-Federally qualified hunters to  
41 use these -- he was talking about private corporation  
42 lands as a good access for people that are not  
43 qualified for subsistence management.

44  
45 So I think that's something that we  
46 really to -- the Board really needs to take a look at  
47 here going into the future. Another aspect of this as  
48 far as the .804 prioritization, in my kind of long  
49 tenure as being on the Council for over 20 years and  
50

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1 discussing these issues and we've always kind of talked  
2 about what .804 actually means in ANILCA.

3

4 My understanding was always that, you  
5 know, pretty basically if you're going to start  
6 restricting subsistence harvesters then you have to  
7 eliminate the competition essentially from  
8 non-Federally qualified users. In reading Section .804  
9 it obviously talks about the prioritization amongst  
10 subsistence qualified users, but nowhere does .804 talk  
11 about prioritizing including non-Federally qualified  
12 users.

13

14 So you either have to essentially  
15 restrict non-Federally qualified or not restrict. As  
16 far as I'm concerned the Staff recommendation really  
17 doesn't do much of a restriction at all on  
18 non-Federally qualified now. They still have a two  
19 buck limit and the only stipulation is that they would  
20 have a shorter season.

21

22 I'll compare that to what the  
23 prioritization did have to say about residents of Unit  
24 3 and residents of Unit 1. I agree and I think there  
25 was pretty much consensus with everybody that newly  
26 classified rural residents of Ketchikan would be a huge  
27 impact on subsistence uses too. It's justified that  
28 they would have their take of deer limited in Unit 2.

29

30 However, to include the residents of  
31 Unit 3, which would be essentially Wrangell, Petersburg  
32 and Kake, and also the other residents of Unit 1,  
33 residents of Saxman and Metlakatla, who have always had  
34 the same hunting opportunities as Unit 2 residents, to  
35 place a restriction on them because Ketchikan is now  
36 going to be rural I think is unjustified.

37

38 Issues like this I anticipate a huge  
39 amount of discussion at the Council meeting in October  
40 on issues such as this. We're going to be meeting in  
41 Wrangell. We have Council members from Petersburg and  
42 Metlakatla, so I'm sure there's going to be a robust  
43 discussion on issues like that. I think it's a little  
44 unwise for the Board at this time to include those  
45 residents in a restriction on this prioritization.

46

47 So I guess those are my thoughts on the  
48 .804 determination. I think you want to take up the  
49 doe hunt as maybe a separate comment period. So I do

50

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1 have a few thoughts on that as well, but I think I'll  
2 have another opportunity later. So that's what I have  
3 to say for now. I don't know if anybody has any  
4 questions for that. I'd be glad to try and answer them  
5 if they do.

6  
7 MADAME CHAIR PITKA: Thank you very  
8 much, Mr. Hernandez. I appreciate your comments. I  
9 see one more hand up from -- it looks like Jim Willems.

10  
11 MR. WILLEMS: Thank you for allowing me  
12 to speak. I'm speaking on behalf of non-resident deer  
13 hunters. Not just non-residents to the state, but  
14 non-residents of the community, which I think, as near  
15 as I can tell, this affects people that live in  
16 Anchorage or Kodiak or whatever.

17  
18 I'm extremely disappointed with this  
19 presentation. I haven't heard anything about the  
20 monetary cost to the communities on Prince of Wales and  
21 the potential millions of dollars that will be lost to  
22 these communities. I wasn't even going to talk about  
23 that, but I was sure hoping somebody would talk about  
24 it. The transporters, the lodging people, the  
25 outfitters, grocery stores, liquor stores, you're  
26 hurting them in the pocket book.

27  
28 I don't mean to be rude, but I don't  
29 hear anybody on this presentation that will be affected  
30 negatively by the dollar amount that is lost. So I  
31 wanted to bring that up. The other thing I want to  
32 bring up is you look at less than four percent of the  
33 potential population of deer on Prince of Wales is  
34 harvested each year by licensed hunters. That is  
35 insignificant to anybody in the wildlife management  
36 world.

37  
38 I'm kind of surprised that you really  
39 think this is going to make a difference on the  
40 population. Large ungulates in a lot of states the  
41 quota is 20-plus percent and in some places up to 30  
42 percent just to control the population. Eliminating a  
43 less than a percent of the harvest -- or the population  
44 by legal harvest will make no difference that you can  
45 tell whatsoever.

46  
47 I'm also very, very disappointed that this is  
48 happening literally one week before the season opens  
49 you're potentially telling people that have purchased  
50



0041

1 airline tickets and made reservations and even  
2 purchased licenses that, yeah, we're just going to  
3 close the hunt. You can't come and hunt with us this  
4 year. That is very disappointing.

5

6 The comment about deforestation is  
7 going to cause a decrease in deer population. That is  
8 contrary to anything -- any deer management practice  
9 anywhere in the United States. Before you even talk  
10 about, well, they need the old growth forest to get  
11 away, you know, tell that to the deer on Kodiak that  
12 live in wide-open grasslands.

13

14 I personally think, and I think a lot  
15 of biologists believe, that deforestation will increase  
16 the population because it will open up a whole lot more  
17 food sources for the deer. I think we saw that in the  
18 '80s and '90s when the population expanded so greatly.  
19 That was towards the end of some of the major  
20 deforestation projects. I think that was related to  
21 more deer on the mountains.

22

23 Somebody mentioned road closures. I  
24 would expect that road closures are a more important  
25 factor to the lower harvest than probably anything else  
26 anybody has talked about. Let's face it, the majority  
27 of the subsistence hunters shoot their deer off the  
28 road or close to the road. When you close a bunch of  
29 forest roads you don't allow these people access to a  
30 lot of places.

31

32 You know, the subsistence hunters they  
33 don't hunt as hard. They don't have the investment.  
34 You know, when you spend a few thousand dollars to get  
35 up there and a thousand dollars to stay, you're going  
36 to go above and beyond what the local guys do to go out  
37 and kill a deer. You're going to kill that deer  
38 farther in where the local people aren't hunting at  
39 all. So by me killing one of those deer that's not  
40 going to increase the harvest to a subsistence hunter  
41 one iota.

42

43 The final thing I'll say is this isn't  
44 going to work. It's going to make -- I get the feeling  
45 that a lot of people on this phone call are going to  
46 feel really good when they do away with the  
47 non-resident hunting and think we really did something.  
48 It won't affect anything. You have roughly 800  
49 non-resident hunters that kill, what, five or six

50

0042

1 hundred bucks. Maybe one percent of the population.

2

3 Your harvest rate is obviously going to  
4 go down because you're not going to kill those five or  
5 six hundred bucks. Then you're going to look at this  
6 and say, see, the population is worse. We're not  
7 killing as many deer as we were even two years ago so  
8 it's even worse. So you're going to double down on it  
9 rather than looking at it and say, you know what, this  
10 was a bad idea. We shouldn't have done it to begin  
11 with.

12

13 The main thing I want you to take away  
14 from this is it's not going to work. It's not going to  
15 increase the population by non-residents not killing  
16 five or six hundred bucks. That will not affect the  
17 population one iota.

18

19 In the analysis -- of course you can  
20 create an analysis to show the results you want, but I  
21 don't see it. One of the statements in the analysis is  
22 that non-residents kill more mature bucks which leads  
23 does to not be bred. That's the most ridiculous thing  
24 I've ever heard. Every single doe on that mountain  
25 will get bred. She may not get bred the first month of  
26 the rut, but she will be bred before winter comes. It  
27 always happens. They always have fawns.

28

29 So I see a whole bunch of people  
30 patting themselves on the back that we're doing a good  
31 thing here, but, man, I don't see any of you saying,  
32 you know, what if this doesn't work and could this be a  
33 bad thing. Honestly, I believe this is a really bad  
34 thing because it sets a precedent. Closing down  
35 hunting opportunities that -- when it doesn't work  
36 you're going to double down on it and you're not going  
37 to say we were wrong. You're just going to say it is  
38 what it is.

39

40 So thank you for your time.

41

42 MADAME CHAIR PITKA: Thank you very  
43 much, Mr. Willems. I'm sorry, I did not catch what  
44 group you were representing.

45

46 MR. WILLEMS: I represent bow hunters  
47 in general, but I am also a director on the Pope &  
48 Young Club. Prince of Wales Island is a destination  
49 for a lot of bow hunters. Not a lot. Obviously

50

0043

1 there's only 800 or so non-resident hunters total.

2

3 It has been a destination for a lot of  
4 people I know and we spend a ton of money getting there  
5 and doing the hunt. Somebody has to stand up for us  
6 and I haven't heard a single person stand up for the  
7 non-resident hunters, which is incredibly  
8 disappointing. Incredibly.

9

10 MADAME CHAIR PITKA: Thank you very  
11 much for your comments today. Do I have any other  
12 hands raised for public testimony?

13

14 (No comments)

15

16 MS. LAVINE: Hello, everybody. This is  
17 Robbin LaVine. If you are interested in providing  
18 public testimony to the Board, you can do so by  
19 pressing \*5. You can raise and lower your hand. So,  
20 once again, if you want to address the Board and  
21 provide public testimony you can press \*5 to do so.

22

23 We have another person who has just  
24 raised your hand. Since there is no other the person  
25 who has just raised their hand please introduce  
26 yourself to the Board.

27

28 MS. PHILLIPS: Hello. My name is  
29 Patricia Phillips. I live in Pelican, Alaska.

30

31 MS. LAVINE: Please proceed. Thank  
32 you.

33

34 MS. PHILLIPS: Thank you. I'm speaking  
35 as a member of the public, but I also serve on the  
36 Southeast Regional Advisory Council. I would just  
37 state that though the RAC did submit these proposals,  
38 had the analysis been brought back to them in a timely  
39 manner that there would have been a more robust  
40 conversation and an analysis could have been done on  
41 those conversations.

42

43 I would like to say that as an  
44 individual I support the analysis of Staff.

45

46 Thank you.

47

48 MADAME CHAIR PITKA: Thank you very  
49 much, Ms. Phillips. I appreciate your comment. Are

50

0044

1 there any further -- is there any further public  
2 testimony?

3

4 MS. LAVINE: Once again you can press  
5 \*5 to raise or lower your hand. If you want to address  
6 the Board, please press \*5.

7

8 (No comments)

9

10 MS. LAVINE: Madame Chair, there are no  
11 further hands raised. Thank you.

12

13 MADAME CHAIR PITKA: Thank you so much.  
14 I appreciate all of the public comments today and the  
15 tribal comments also. At this time I believe we are at  
16 the Alaska Department of Fish and Game comments. Is  
17 Mr. Mulligan available to do the comments or is it  
18 going to be Mr. Burch?

19

20 MR. MULLIGAN: Madame Chair, this is  
21 Ben Mulligan. Can you hear me okay?

22

23 MADAME CHAIR PITKA: Yes, thank you.  
24 Loud and clear.

25

26 MR. MULLIGAN: Thank you, Madame Chair.  
27 For the record my name is Ben Mulligan, Deputy  
28 Commissioner for the Alaska Department of Fish and  
29 Game. I'll start with 01-03. The Alaska Department of  
30 Fish and Game opposes WSA25-01 and took no position on  
31 03. We oppose WSA25-01 because we can find no  
32 justification under ANILCA Title VIII for the Board to  
33 approve this closure.

34

35 If enacted, it would unnecessarily  
36 deprive non-Federally qualified users of sustainable  
37 deer hunting opportunity contrary to the terms of Title  
38 VIII. Currently, non-Federally qualified users are  
39 only allowed to harvest two bucks and any additional  
40 restrictions on this group will have negligible impacts  
41 on the Prince of Wales deer population.

42

43 Federally qualified users have  
44 indicated there have been impacts to their ability to  
45 carry out their subsistence activities. However,  
46 measures of subsistence have never been Federally  
47 defined. Until that occurs it is extremely challenging  
48 to measure those impacts.

49

50

0045

1                   What ADF&G has been able to measure is  
2 the number of hunters and harvests which have  
3 fluctuated over the last three decades, but the current  
4 number of hunters and harvests similar to that of three  
5 decades ago, but lower than decades ago when there was  
6 a record deer harvest on the island. We will say that  
7 it is not a realistic expectation that deer populations  
8 be managed for the record harvest numbers observed in  
9 and around 2015.

10

11                   The catch per unit effort measure that  
12 the Department uses calculated at the number of days  
13 hunted to harvested year is our best index to measure  
14 the size of the deer population in Unit 2. The CPUE  
15 of this decade is similar to values observed three  
16 decades ago when there were no restrictions. As you  
17 can see in the charts provided by ourselves and OSM  
18 that population rebounded into a record population.

19

20                   To note, just as an addition since it's  
21 been brought up at the public hearing and at this  
22 hearing, we ran -- the comment that all non-Federally  
23 qualified user opportunity needs to be eliminated  
24 before restrictions to Federally qualified users take  
25 place and we can find nowhere in ANILCA where that  
26 statement can be confirmed.

27

28                   Under Section .804 the taking on public  
29 lands of fish and wildlife for nonwasteful subsistence  
30 uses shall be accorded priority over the taking on such  
31 lands of fish and wildlife for other purposes should be  
32 interpreted as just a general statement. that gives a  
33 priority to subsistence under certain criteria. The  
34 rest of Section .804 explains how and when the  
35 subsistence priority is to be implemented.

36

37                   Just some other notes during testimony  
38 and just some things to point out that we've been  
39 hearing is, you know, the timing of passing this  
40 Special Action similar to actions we've seen on Special  
41 Action Requests in the past and this is coming right on  
42 the heels of the start of the deer season in Unit 2.

43

44                   It creates a troublesome aspect beyond  
45 just the biologic, which we see no justification for,  
46 so it should be considered if you guys are going to  
47 take this action considering there's no conservation  
48 concern is that economic concern for the communities.

49

50

0046

1                   If you do pass this, we will push to  
2 have you guys -- I mean do full communication. You've  
3 got to put something out to let folks know or else they  
4 won't know and the possibility of creating criminals is  
5 there.

6  
7                   One item that I was going to mention in  
8 general now, but it applies across the board, is that  
9 -- and I've talked to OSM leadership about this and  
10 they're working on it and actually saw some changes  
11 already -- the lack of timely information on these  
12 Special Actions. I understand there's been some  
13 challenges. I'm recognizing that and it makes it  
14 difficult, but the information needs to be put out  
15 before a week ahead of the meeting.

16  
17                   I don't think most of the public knew  
18 what the analysis was going to say and probably still  
19 doesn't to this day considering when it came out. We  
20 submitted our comments to OSM on June 13th and those  
21 comments were just made available through the Board on  
22 -- I think it was Wednesday.

23  
24                   From the aspect of, you know, this  
25 being a public process and having an informed public is  
26 important, the Board needs to start realizing that --  
27 you know, I know what we get chastised for. For not  
28 being transparent enough and getting the stuff out when  
29 we get it out, which is way before the timeframe in  
30 which this came out, that that should be strived for.  
31 I will say it's been recognized and I know they're  
32 going to work on it, but I had to bring that up.

33  
34                   Some other items that I heard that I  
35 wanted to just briefly bring up because it seems like  
36 the conversation has been that, you know, with  
37 Ketchikan going rural that all of a sudden all of  
38 Ketchikan will come over. You know, we looked at that  
39 and I think the one thing that wasn't mentioned is an  
40 aspect of how you're hunting is going on in Unit 1A,  
41 which is the unit in which Ketchikan resides. You  
42 know, for the last regulatory year, which was 2024,  
43 Unit 1A hunters has experienced the highest level of  
44 deer harvest ever recorded and a low average number of  
45 harvest days. So you have to take those factors in.

46  
47                   I don't think you can comfortably  
48 assume that all the -- all of Ketchikan is going to  
49 dump over into the island. We know from data just --  
50

0047

1 you know, let's say just for that same regulatory year,  
2 you know, Unit 2 hunters coming from Ketchikan was 234.  
3 The previous regulatory year was 292. The previous one  
4 to that was 289, but that's coming from a high in 2015  
5 of seven to eight hundred eight-four. So that number  
6 has dropped precipitously. Some of it probably has to  
7 do with coming out of that record peak on the island,  
8 but also probably has to do with how abundant the  
9 closer deer population is.

10

11 With that, Madame Chair, we oppose  
12 WSA-25-01 and we appreciate the opportunity.

13

14 Thank you.

15

16 MADAME CHAIR PITKA: Thank you very  
17 much. Just to be clear you have no stand on 25-03?

18

19 MR. MULLIGAN: Madame Chair, that is  
20 correct.

21

22 MADAME CHAIR PITKA: Thank you. I  
23 appreciate that. At this time I'd like to take the  
24 Interagency Staff Committee recommendations.

25

26 MS. LAVINE: Thank you, Madame Chair.  
27 Members of the Board. For the record this is Robbin  
28 LaVine, Subsistence Policy Coordinator and Chair of the  
29 Interagency Staff Committee recommendation is to oppose  
30 WSA25-01/03. So both.

31

32 The Southeast Alaska Subsistence  
33 Regional Advisory Council submitted three special  
34 action requests in anticipation of a possible increase  
35 in harvest pressure if or when Ketchikan is designated  
36 as a rural community. Once rural, Ketchikan hunters  
37 would be able to harvest under more liberal Federal  
38 subsistence hunting regulations.

39

40 The Council expressed concern that this  
41 scenario could increase competition for deer on Prince  
42 of Wales Island result in fewer deer being available  
43 for harvest by the much smaller Prince of Wales Island  
44 communities, and reduce the Sitka black-tailed deer  
45 population to levels triggering long-term conservation  
46 concerns.

47

48 OSM analyzed WSA25-01 and WSA25-03  
49 together because restrictions to non-Federally

50

0048

1 qualified users are often considered before limiting  
2 Federally qualified subsistence users through the  
3 Section .804 prioritization process.  
4

5               The ISC acknowledges the concerns and  
6 uncertainty that this change in Ketchikan's status  
7 brings, shared by both the Council and the smaller  
8 communities of Prince of Wales Island. However, the  
9 impacts of this change are not yet known and existing  
10 data do not support such measures as closures or  
11 prioritization at this time.  
12

13               Although it is widely believed by  
14 biologists, managers, and Federally qualified  
15 subsistence users from Prince of Wales Island that the  
16 local deer population has been declining in recent  
17 years, data show that subsistence users have continued  
18 to harvest deer at comparable levels and that the  
19 overall harvest has not decreased substantially. This  
20 indicates that the Prince of Wales Island deer  
21 population is managed successfully under current  
22 regulations.  
23

24               Ketchikan hunters have always been  
25 eligible to hunt on Prince of Wales Island under State  
26 regulations, yet they have averaged less than one deer  
27 per hunter from Ketchikan. Thus, it seems unlikely that  
28 there will be a significant increase in harvest, even  
29 under the more liberal limits for Federally qualified  
30 subsistence users.  
31

32               In addition, State and Federal managers  
33 maintain liberal annual harvest limits, four bucks per  
34 person under State regulations and five deer per person  
35 under Federal regulations, demonstrating a lack of  
36 imminent conservation concern.  
37

38               Finally, non-Federally qualified users  
39 are already restricted to a two-buck bag limit on  
40 Federal public lands in Game Management Unit 2 by the  
41 Federal Subsistence Board and their efforts make up a  
42 small portion of the overall harvest. For the  
43 aforementioned reasons, the ISC does not recommend  
44 closing deer hunting to non-Federally qualified users  
45 on Prince of Wales Island at this time.  
46

47               A Section .804 prioritization may be  
48 conducted to protect the continuing viability of a fish  
49 or wildlife population or to continue subsistence uses  
50



0049

1 of such populations, typically when there is a shortage  
2 of subsistence resources. As noted above, hunter effort  
3 and harvest data do not warrant a closure to  
4 non-Federally qualified users for conservation  
5 concerns, nor for the continuation of subsistence uses.  
6

7 Further, if additional restrictions are  
8 not applied to non-Federally qualified subsistence  
9 users, the ISC does not recommend conducting a Section  
10 .804 prioritization among Federally qualified  
11 subsistence users at this time.  
12

13 We do not yet know the impact, if any,  
14 of designating Ketchikan as rural. Management agencies  
15 need to collect additional data on the number of  
16 hunters and deer harvested on Prince of Wales Island,  
17 specifically after Ketchikan becomes rural, to start  
18 understanding the impact of this regulation change.  
19

20 It further is relevant that the Federal  
21 Subsistence Management Program does not conduct Section  
22 .804 prioritizations by special action as a matter of  
23 course. Special actions are undertaken in cases of  
24 emergencies or time-sensitive circumstances that  
25 necessitate a regulatory change before the next cycle.  
26 Section .804 analyses are in-depth and time intensive,  
27 benefitting tremendously from Council input and the  
28 public process and thus should be conducted during the  
29 regulatory cycle.  
30

31 Waiting to further restrict deer  
32 harvest on Prince of Wales Island will allow for the  
33 opportunity to collect hunter use and harvest data and  
34 begin to determine if, and to what extent, Ketchikan's  
35 change in status may affect the Unit 2 deer population.  
36 If a problem becomes apparent during the 2025 hunting  
37 season, for example, excessive harvest, then the Board  
38 or in-season manager can adjust hunt opportunities  
39 under emergency special actions.  
40

41 Given the uncertainty about the impacts  
42 of redesignating Ketchikan as rural and the Board or  
43 in-season manager's ability to address emergent  
44 problems through special actions, the ISC believes  
45 implementing an .804 prioritization now is pre-mature.  
46

47 The recommended course of action is  
48 for the Board to instead consider Wildlife Proposal  
49 WP24-06 during the upcoming regulatory cycle in April  
50

0050

1 of 2026, which requests the Board conduct an .804  
2 analysis for Southeast Alaska's rural communities.

3

4 Thank you, Madame Chair.

5

6 MADAME CHAIR PITKA: Thank you very  
7 much, Ms. LaVine. I appreciate the ISC comments. At  
8 this time we have Board discussion with the Council  
9 Chair and the State Liaison. This is the time where we  
10 ask questions.

11

12 MS. BOARIO: Madame Chair.

13

14 MADAME CHAIR PITKA: Yes, please,  
15 Member Boario.

16

17 MS. BOARIO: Thank you very much,  
18 Madame Chair. Fish and Wildlife Service. Mr.  
19 Mulligan, thank you for your testimony and for the  
20 written testimony from the State as well. I was  
21 wondering, the information on Unit 1A, I appreciated  
22 that extra context on the trends there.

23

24 I'm wondering when the State starts to  
25 get information or data points back from like the fall  
26 hunt around Unit 1A and 2. I mean I think it goes --  
27 the Federal hunt goes into January, but I'm wondering  
28 how you guys start to look at data and when that's  
29 available. I'm thinking, of course, what we might be  
30 able to look at what's new at the April meeting.

31

32 MR. MULLIGAN: Through the Chair,  
33 Member Boario. I'm not making a definitive assumption  
34 on that one without being able to get a clear date from  
35 Staff. I would say in order to process that  
36 information -- because a lot of that you've got to  
37 realize is coming in on harvest tickets and so we've  
38 got to basically compile that and process it. So I'd  
39 say late spring. If we can, we will provide it in our  
40 comments in April, but I mean it's not going to be in  
41 time for you guys to get it in your books and all that.

42

43 MS. BOARIO: Okay. That's super  
44 helpful. I appreciate that. I have a second question  
45 too. In the written testimony the State writes  
46 degraded habitats are believed to have a much greater  
47 impact on the POW deer population than harvest.

48

49 I'm wondering if you could speak a

50

0051

1 little bit more to the impacts of habitat on the deer  
2 population. Specifically, I'm just curious more about  
3 the herds group as well and maybe the efforts that have  
4 been made to date and what might be coming in the  
5 future around the habitat piece.

6  
7 MR. MULLIGAN: Thank you for that  
8 question. Through the Chair, Member Boario. As we see  
9 from the -- I mean the gentleman was right. You know,  
10 when you first have that harvest things do get better,  
11 but that secession as the forest kind of populates  
12 itself that we have issues and that herds group is  
13 working and that was one of the things actually I  
14 forgot to mention.

15  
16 Through the Forest Service the mule  
17 deer now -- Black Tail Foundation received that funding  
18 and I believe work is going to be done. Now how that  
19 gets measured I can't answer that off the top of my  
20 head. I know that work is just now getting underway,  
21 so there's no way to really quantify or evaluate it at  
22 this time.

23  
24 MS. BOARIO: Okay. Thank you very  
25 much. That's it for me, Madame Chair.

26  
27 MADAME CHAIR PITKA: Thank you very  
28 much. I appreciate the questions. I have a lot of  
29 feedback on the line. If you're not speaking could you  
30 please mute your line. Okay. It sounded like a wind  
31 tunnel for a minute.

32  
33 I had a question on the numbers of the  
34 deer. So, Mr. Mulligan you mentioned that it was an  
35 estimate. So when was the last time your studies were  
36 taken on those populations? Thank you.

37  
38 MR. MULLIGAN: Madame Chair. I'd have  
39 to check in with staff. I've got them on Teams, so let  
40 me see if I can get an answer, but if not it's probably  
41 -- I know we've said we do population estimates based  
42 off of harvest. So if you're looking for an actual  
43 survey, I couldn't answer that.

44  
45 I know it was mentioned in the Forest  
46 Service staff analysis. Doing an actual survey is  
47 extremely challenging given the physical  
48 characteristics of the island. So I may be able to  
49 answer that a little later, but not off the top of my  
50

0052

1 head.

2

3 MADAME CHAIR PITKA: Thank you for the  
4 attempt. I appreciate it. I always have like really  
5 hard questions for you. Is there any other discussion  
6 right now?

7

8 MR. CHEN: Madame Chair, BIA.

9

10 MADAME CHAIR PITKA: Please go ahead,  
11 Mr. Chen.

12

13 MR. CHEN: Thank you, Madame Chair.  
14 Mr. Mulligan, you cited some information about recent  
15 harvest numbers for Unit 1A and we find those to be  
16 very interesting because that corroborates a number of  
17 comments and information provided by folks from  
18 Ketchikan that the deer are quite abundant on their own  
19 island and that their own hunters are spending more  
20 time on their own island to get deer rather than going  
21 to Prince of Wales. So we appreciate that.

22

23 Thank you.

24

25 MADAME CHAIR PITKA: Thank you. Are  
26 there any.....

27

28 MR. MULLIGAN: Madame Chair.

29

30 MADAME CHAIR PITKA: Yes, please go  
31 ahead.

32

33 MR. MULLIGAN: Sorry to interrupt you.  
34 Just heard back from -- oh, for the record, just  
35 because I'm on the phone, this is Ben Mulligan from the  
36 Alaska Department of Fish and Game again. The last  
37 time we did pellet counts was sometime around 2019,  
38 2020, for the record.

39

40 MADAME CHAIR PITKA: Thank you so much.  
41 I appreciate that.

42

43 MR. HERNANDEZ: Madame Chair. This is  
44 Don Hernandez. Can I weigh in on some of this perhaps?

45

46 MADAME CHAIR PITKA: Yeah, it's Council  
47 -- please.

48

49 MR. HERNANDEZ: I mean this relates to

50

0053

1 a lot of what the Southeast Regional Council has been  
2 dealing with over the years. Population estimates and  
3 -- there are no population estimates reliable. Fish  
4 and Game bases their relative populations on hunter  
5 success numbers and various factors like that. They're  
6 influenced a lot by participation and whatnot.

7

8                   There's extensive local knowledge that  
9 has been heard at Council meetings for years. People  
10 have long experiences of hunting all over Prince of  
11 Wales Island. You really have to take into  
12 consideration what they are saying as well. When  
13 you're out in the field and you're observing and you're  
14 hunting and you're seeing deer sign and you're keeping  
15 track of how many does you see and how many bucks and  
16 where and all of those factors. That's really valid  
17 information.

18

19                   When the Council says they're seeing  
20 problems with the deer population based on local  
21 knowledge, I think you really have to pay attention to  
22 that. Also in regards to Ketchikan and their more  
23 recent years drastic increase in deer harvest, that  
24 situation kind of mirrors what has happened on Prince  
25 of Wales Island in the past. It's mainly driven by  
26 access.

27

28                   When you have increased access to areas  
29 that have not been available to deer hunters in the  
30 past, which is the case on Revillagigedo Island right  
31 now. They just opened up a whole lot of new road  
32 systems to folks. Yes, you see a really good increase  
33 in the deer harvest. It does not necessarily relate to  
34 the overall population. It's just hunter success,  
35 accessing new areas.

36

37                   We have a long history of this on  
38 Prince of Wales Island where for, you know, 30 years  
39 every year there were new areas being opened to access  
40 for hunters and new logging roads reaching into areas  
41 that had never been hunted before. It kept the success  
42 rate high for a number of years until that roading  
43 ended, the cancelling of Pope contracts and, you know,  
44 no more new access. It is a -- it's a false and  
45 misleading characterization of population if you merely  
46 look at hunter success rates. It could be very  
47 misleading and you should not fall into that trap.

48

49                   What's happening on Prince of Wales

50

0054

1 Island and it will happen on Revillagigedo Island as  
2 well is a lot of deer get shot in new areas opened up  
3 to access due to logging. When those clearcuts start  
4 growing over there's no longer good access for hunting  
5 and then you get into the stem exclusion phase. All of  
6 a sudden you'll find yourself in a situation where what  
7 happened to all the deer.

8  
9 So I really think we've got to take  
10 that into consideration here. I'm glad that folks on  
11 Ketchikan are having good success in their home area  
12 and it's taking pressure off of Prince of Wales. It's  
13 probably going to change in the future. You know, for  
14 this season the status quo will probably remain the  
15 same. I think we're okay there.

16  
17 Just as a general comment on judging  
18 populations, like I say, don't fall into these  
19 misconceptions. It's very dangerous. So thanks.

20  
21 MADAME CHAIR PITKA: Thank you, Mr.  
22 Hernandez. I appreciate that comment. Does anybody  
23 else have any other discussion with the State Liaison  
24 or the Board Chair?

25  
26 (No comments)

27  
28 MADAME CHAIR PITKA: Hearing none, I  
29 would like to open the floor for a Board motion on  
30 WSA25-01.

31  
32 MS. GREWE: I have my hand raised,  
33 Madame Chair. I don't know if you can see that. This  
34 is Nicole Grewe.

35  
36 MADAME CHAIR PITKA: I can only see one  
37 hand raised. Thank you so much. Please proceed.

38  
39 MS. GREWE: Sure. Thank you. This is  
40 Acting Regional Forester Nicole Grewe with the Forest  
41 Service. Madame Chair, because Office of Subsistence  
42 Management analyzed Wildlife Special Actions 25-01 and  
43 25-03 together I move to adopt both 25-01 and 25-03.  
44 If I get a second, I'll explain why I intend to oppose  
45 my motion for both special actions.

46  
47 I'll take a pause there and wait for a  
48 second.

49  
50

0055

1 MS. BOARIO: Fish and Wildlife Service  
2 seconds.

3  
4 MADAME CHAIR PITKA: Thank you, Member  
5 Boario. Okay, proceed.

6  
7 MS. GREWE: Thank you. Madame Chair  
8 and members of the Board. First I would like to thank  
9 the Southeast Alaska Subsistence Regional Advisory  
10 Council for their genuine concern about the health of  
11 the Sitka blacktail deer population on Prince of Wales  
12 Island and for the Federally qualified subsistence  
13 users in the small communities of Prince of Wales  
14 Island.

15  
16 However, the Forest Service believes  
17 this is premature to approve a Special Action Request  
18 to specifically restrict Ketchikan community hunters  
19 preemptively. This is because the impacts of the  
20 change in Ketchikan's status are not yet known and  
21 existing data do not support implementing agency  
22 regulations at this time.

23  
24 There's a couple bullets under that  
25 statement. There have been no significant changes of  
26 hunter effort or harvest in recent years and there are  
27 currently no extenuating circumstances that indicates  
28 an emergency conservation issue has suddenly arisen.

29  
30 Specifically regarding 25-01, though it  
31 is widely believed that the Prince of Wales deer  
32 population has been declining over the years State and  
33 Federal wildlife managers believe the primary cause of  
34 decline is from the loss of deer habitat, stem  
35 exclusion, lack of habitat connectivity and harsh  
36 winters.

37  
38 Nevertheless, the data shows that  
39 subsistence users have continued to harvest deer.  
40 Comparable levels over the long term dating as far back  
41 as the '90s. Additionally, both Federal and State deer  
42 harvest limits have been liberal for many years with a  
43 five-year limit under Federal regs and a four buck  
44 limit under State regs.

45  
46 Non-Federally qualified users are  
47 already restricted to a two buck bag limit on Federal  
48 public lands in Game Management Unit 2 by Federal  
49 Subsistence Board. This indicates the Prince of Wales  
50

0056

1 deer population has been managed successfully under  
2 current regulations, including the existing restriction  
3 limiting non-Federally qualified subsistence users to  
4 two bucks.

5  
6 The total deer harvest by non-Federally  
7 qualified users on Prince of Wales makes up a  
8 relatively small proportion of the overall annual  
9 harvest. They typically take about only one to two  
10 bucks per year per hunter. Moreover, if Ketchikan is  
11 re-designated as rural, making residents of Ketchikan  
12 eligible to hunt under Federal regulations, the  
13 proportion of harvest attributable to non-Federally  
14 qualified users is likely to get smaller.

15  
16 Ketchikan hunters have always been  
17 eligible to hunt on Prince of Wales under State  
18 regulations, yet they've averaged less than one deer  
19 per hunter. Given all of this, as well as the  
20 uncertainty about the effects of redesignating  
21 Ketchikan as rural, I cannot say that additional  
22 restrictions on non-Federally qualified users are  
23 necessary at this point in time. The best approach  
24 here is to wait and see if there's a sudden increase of  
25 hunters or deer harvests that may require additional  
26 restrictions on non-Federally qualified users.

27  
28 For this reason the Forest Service  
29 believes that it's not necessary to close deer hunting  
30 on Prince of Wales to non-Federally qualified users at  
31 this time and, therefore, the Forest Service opposes  
32 25-01. Likewise, the Forest Service also believes it  
33 is premature to conduct a Section .804 prioritization  
34 among rural communities as requested in Wildlife  
35 Special Action 25-03.

36  
37 As we shared in the justification to  
38 oppose 25-01, long-term hunter effort and harvest data  
39 do not warrant a closure on non-Federally qualified  
40 users for conservation concerns or the continuation of  
41 subsistence uses at this time. Nor is the Section 84  
42 prioritization analysis necessary for maintaining the  
43 continued viability of deer population or to continue  
44 such subsistence uses.

45  
46 Again, we don't know what the impact  
47 will be, if any, on designating Ketchikan as rural.  
48 State and Federal managers first need to collect the  
49 data on the number of hunters and deer harvested on  
50



0057

1 Prince of Wales after Ketchikan becomes rural before  
2 they can begin to understand the effects of such a  
3 regulatory change.

4

5 Moreover, as the Interagency Staff Committee  
6 pointed out that the Federal Subsistence Management  
7 Program generally does not conduct Section 84  
8 prioritizations by Special Action as a matter of course  
9 and routine. Special Actions are undertaken in cases  
10 of emergencies or time sensitive circumstances that  
11 necessitate a regulatory change in quick manner.

12

13 The Forest Service believes waiting  
14 until after the '25 deer season takes place will allow  
15 wildlife managers to collect hunter effort and harvest  
16 data after Ketchikan hunters have had the opportunity  
17 to hunt under Federal subsistence regulations. This  
18 data will provide a baseline of information about how  
19 Ketchikan's change in status affects the Unit 2 deer  
20 population on Prince of Wales.

21

22 If a conservation concern becomes  
23 apparent during a season, such as a greatly increased  
24 deer harvest, that an in-season manager can always  
25 adjust hunting parameters through an emergency special  
26 action.

27

28 Given the uncertainty about the effects  
29 of reclassifying Ketchikan as rural and the Board or  
30 the in-season manager's ability to address emergent  
31 conservation concerns, the Forest Service agrees with  
32 the ISC's recommendation that implementing an .804  
33 prioritization is premature. Instead, the better  
34 course is to tackle this issue during the ordinary  
35 regulatory cycle for wildlife in 2026 when the Board  
36 can benefit from Council input and full public process.

37

38 The Council has already submitted  
39 Wildlife Proposal 26-04, which requests that the Board  
40 conduct a Section .804 analysis.

41

42 Thank you, Madame Chair and members of  
43 the Board.

44

45 MADAME CHAIR PITKA: Thank you very  
46 much. I appreciate that. Now we're under Board  
47 discussion.

48

49 (No comments)

50

0058

1 MADAME CHAIR PITKA: Hearing none. Can  
2 we please get a roll call vote.

3

4 MS. LEONETTI: Okay. We'll start with  
5 Ben Payenna. Ben, if you're on the phone, you may have  
6 to unmute.

7

8 MS. LAVINE: Madame Chair, I just got a  
9 text from Ben Payenna -- this is Robbin LaVine -- who  
10 said his phone was dropped. He's trying to hop back  
11 on.

12

13 MADAME CHAIR PITKA: Okay. We'll come  
14 back to him at the end. Thank you.

15

16 MS. LEONETTI: Thank you, Robbin.  
17 Bureau of Indian Affairs, Glenn Chen.

18

19 MR. CHEN: The BIA votes to reject  
20 WSA25-01 and WSA25-03. We concur with the  
21 justification provided by the U.S. Forest Service.  
22 Thank you.

23

24 MS. LEONETTI: Thank you, Mr. Chen.  
25 Forest Service, Nicole Grewe.

26

27 MS. GREWE: Sorry, I had my mute button  
28 on and I just spoke my piece, but I'll do it again.  
29 Forest Service opposes both WSA25-01 and WSA25-03.  
30 Thank you.

31

32 MS. LEONETTI: Thank you, Ms. Grewe.  
33 Bureau of Land Management, Kevin Pendergast.

34

35 MR. PENDERGAST: That's correct. Thank  
36 you. BLM votes to oppose Wildlife Special Action 25-01  
37 and 03 for the reasons stated by the Forest Service.  
38 Thank you.

39

40 MS. LEONETTI: Thank you, Mr.  
41 Pendergast. Fish and Wildlife Service, Sara Boario.

42

43 MS. BOARIO: The U.S. Fish and Wildlife  
44 Service agrees with the justification made by the  
45 Forest Service and the Interagency Staff Committee and  
46 so opposes WSA25-01. There is a current closure in  
47 place to non-Federally qualified users in the Federal  
48 subsistence regulations and an additional larger  
49 closure is not needed at this time.

50

0059

1 As noted in the OSM analysis, a  
2 percentage of nFqu's outside of Ketchikan are unable  
3 and remain unable to hunt under the current closure in  
4 Unit 2 from August 1 through 15. While Ketchikan was  
5 initially included in that closure because of their  
6 non-rural status prior to the FSB action to designate  
7 Ketchikan as rural, we also agree that it is prudent to  
8 wait to see what the impacts of this decision may be  
9 before additional closures are implemented.

10  
11 I'll be interested to see what we learn  
12 about harvest in Unit 1A and 2 this upcoming season as  
13 well recognizing that it is a time crunch for the State  
14 and potentially have this for our April 2026 meeting  
15 where we can take this up with the benefit of a full  
16 public process. I appreciate the concerns about the  
17 timing of this public session that have been voiced  
18 today as well.

19  
20 The U.S. Fish and Wildlife Service also  
21 opposes WSA25-03. During our last regulatory meeting  
22 when we took up the proposal to review the request for  
23 Ketchikan to become rural I said we should be ready to  
24 take up the .804 -- and I appreciate the Southeast RAC  
25 submitting this as a Special Action Request to the  
26 Board and their efforts to address possible  
27 conservation and subsistence concerns in a timely  
28 manner.

29  
30 We do have the same and similar request  
31 to conduct an .804 user prioritization analysis  
32 submitted to the Board for our April 2026 wildlife  
33 meeting. As we heard from OSM the publication of the  
34 final rule is tomorrow and we will not have seen the  
35 impacts of Ketchikan becoming rural. I commend OSM for  
36 beginning the .804 analysis, but more time is prudent  
37 to make this decision as part of the full public  
38 regulatory process.

39  
40 Thank you.

41  
42 MS. LEONETTI: Thank you, Ms. Boario.  
43 National Park Service, David Alberg.

44  
45 MR. ALBERG: Madame Chair. The  
46 National Park Service opposes WSA25-01 and WSA25-03 for  
47 the reasons stated by the Forest Service. We  
48 acknowledge the concerns and uncertainty that this  
49 change in Ketchikan's status causes for the Southeast  
50

0060

1 Alaska Subsistence Regional Advisory Council and the  
2 smaller communities of Prince of Wales Island.

3

4 There is no current conservation  
5 concern for the Prince of Wales deer population;  
6 however, with the Board, the NPS stands ready to  
7 address Special Actions if they were to become  
8 necessary.

9

10 MS. LEONETTI: Thank you, Mr. Alberg.  
11 Chair Rhonda Pitka.

12

13 MADAME CHAIR PITKA: I also oppose the  
14 Special Action 25-01 and 03 in concurrence with the  
15 justification provided by the U.S. Forest Service.  
16 Thank you all today.

17

18 MS. LEONETTI: Thank you, Madame Chair.  
19 And I will come back to Mr. Payenna. Was he able to  
20 join again?

21

22 MR. PAYENNA: Can you hear me now?

23

24 MS. LEONETTI: Yes. Go ahead.

25

26 MR. PAYENNA: Sorry. I couldn't get  
27 unmuted earlier and it dropped. I will also vote to  
28 oppose 25-01 and 03.

29

30 MS. LEONETTI: Thank you, Mr. Payenna.  
31 Madame Chair, the motion to support Wildlife Special  
32 Action 25-01 and 03 fails unanimously.

33

34 MADAME CHAIR PITKA: Thank you so much.  
35 I appreciate everybody's thoughtfulness and discussion  
36 and comments today.

37

38 Now we are on Wildlife Temporary  
39 Special Action Request WSA25-02. I would like the  
40 presentation of analysis by Mr. Jason Roberts. Thank  
41 you.

42

43 MR. ROBERTS: All right. Hopefully  
44 this one will be a little quicker than the last one.  
45 This is Jason Roberts, anthropologist with OSM for the  
46 record.

47

48 Wildlife Special Action WSA25-02  
49 submitted by the Southeast Alaska Regional Advisory

50

0061

1 Council requests eliminating the Federal doe hunt in  
2 Unit 2 for the 2025/26 regulatory year if the final  
3 rule establishing Ketchikan as a rural community  
4 publishes before the end of the 2025/26 Unit 2 deer  
5 season. As we heard earlier, it is going to happen  
6 tomorrow.

7  
8 The proponent notes that there are  
9 existing conservation concerns regarding the Unit 2  
10 deer population, and that those concerns will increase  
11 significantly with the addition of thousands Federally  
12 qualified subsistence users from Ketchikan. Before the  
13 Federal Subsistence Board's recent decision to change  
14 Ketchikan to a rural status community, Ketchikan  
15 residents could only harvest two bucks on Federal  
16 public lands in Unit 2.

17  
18 However, with the recent change in  
19 Ketchikan's rural status, Ketchikan residents will  
20 become Federally qualified subsistence users and they  
21 will be able to harvest up to five deer in Unit 2, one  
22 of which may be a doe. The proponents argue that doe  
23 harvest is a customary and traditional practice for  
24 Prince of Wales Island residents and while the current  
25 level of doe harvest is sustainable, the increased doe  
26 harvest expected by Ketchikan residents will not be  
27 sustainable.

28  
29 They also note that restricting female  
30 harvest when there is a conservation concern is a  
31 recognized principle of wildlife management. The  
32 proponent views this request as a proactive measure to  
33 conserve the Unit 2 deer population before the  
34 situation becomes even worse, as one bad winter and  
35 excessive doe harvest could devastate the population  
36 and greatly prolong recovery.

37  
38 The proponent explains that multiple  
39 interactive factors such as predation, habitat loss,  
40 and weather have contributed to the decline of the Unit  
41 2 deer population. However, they note that hunting and  
42 harvest mortality, particularly of does, are the most  
43 controllable factors.

44  
45 While the proponent recognizes that  
46 eliminating doe harvest may hurt Prince of Wales'  
47 subsistence users whose subsistence needs for deer are  
48 already not being met, regulatory mechanisms do not  
49 currently allow for doe harvest by only a subset of  
50

0062

1 subsistence users.

2

3

4 So the first Federal regulation  
5 allowing for the legal harvest of a female deer in Unit  
6 2 was in 1995. Proposal P95-01 allowed for the harvest  
7 of one antlerless deer, with a season of October 15th  
8 to December 31st. Since then Federal regulations have  
9 provided for the harvest of one female or antlerless  
10 deer, with a season of October 15th to the end of the  
11 hunting season.

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0063

1 practice on Prince of Wales and that sometimes  
2 residents must make the choice between taking a doe or  
3 going hungry.  
4

5                   So the number of breeding females in a  
6 wildlife population generally determines the  
7 reproductive capacity of the population, and high rates  
8 of female mortality can result in population decline.  
9 As such, a recognized principle of wildlife management  
10 to conserve wildlife populations by restricting harvest  
11 of females.  
12

13                   However, research indicates that the  
14 overall abundance and productivity of deer in Unit 2 is  
15 determined by a complex combination of factors  
16 including habitat quality, predation, weather, and  
17 harvest. Throughout Prince of Wales decades of logging  
18 have created various-aged timber stands along with an  
19 extensive network of roads to support logging  
20 operations. Prince of Wales has sustained the highest  
21 rates of logging in the region.  
22

23                   While recent clearcuts can provide  
24 improved forage for deer, these logged forests are  
25 increasingly entering the stem exclusion stage right  
26 now on Prince of Wales and severely reduces their  
27 carrying capacity for deer. About 1,500 square  
28 kilometers of forest on Prince of Wales is expected to  
29 enter the stem exclusion stage over the next 20 years,  
30 representing about one-third of the old growth  
31 available before industrial logging. So the population  
32 and productivity of deer in Unit 2 is expected to  
33 decline for the foreseeable future.  
34

35                   Clearcuts and post-disturbance forest  
36 generally increase the risk of death for all sex and  
37 age groups of deer, with larger scale features like  
38 topography playing a larger role for adult and yearling  
39 females. Farmer and colleagues reported that dense  
40 clearcuts increased the risk of mortality by 341  
41 percent, likely due to reduced visibility and lack of  
42 forage.  
43

44                   For adult male deer, hunting was found  
45 to be the largest source of mortality and was strongly  
46 associated with the use of roads. Despite a small  
47 reported harvest of does in Unit 2, radio collar  
48 studies suggest that hunting is a more significant  
49 cause of mortality of female deer here than what is  
50

0064

1 reported.

2

3

4 Predation is frequently reported by  
5 Unit 2 residents as another driving factor in Unit 2  
6 deer population dynamics. Black bears are known to  
7 target young fawns during the birthing season. Unit 2  
8 residents have also reported that deer abundance  
9 typically decreases as the density of wolves increases.

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A comprehensive review of predator-prey dynamics in deer populations found that deer density in relation to the habitat carrying capacity was the key consideration in whether predation was a limiting factor in deer populations. For deer populations near carrying capacity, predation mortality tends to be compensatory and that it reduces mortality from other reasons so that overall mortality does not necessarily change. If predation is reduced, other mortality factors like malnutrition will likely replace it.

Based on data from harvest reports, relatively few does are harvested in Unit 2 each year. From 1997 to 2017, an estimated average of 77 does were harvested each year by Federally qualified users representing just 3 percent of the total estimated deer harvest during this period. However, the estimated number of does harvested has declined since this time.

From 2018 to 2023, Federally qualified users harvested an estimated average of 42 does each year or about 2 percent of the total overall harvest. The reason for this decline is unknown, but it is partially explained by a corresponding but lesser decline in the number of Federally qualified hunters.

However, Unit 2 is, as I stated before, believed to have one of the highest rates of unreported and illegal harvests in the region. The amount of unreported and illegal harvest has been estimated to be about equal to the reported harvest. This means that the actual average deer harvest in Unit 2 may have been closer to 5,302 deer per year from 1997-2023, and that the amount of does harvested each year is also likely higher than what can be estimated from reported harvest data.

Under the current regulation, harvest ticket number five must be used when harvesting a doe.



0065

1 This provision is intended to provide a mechanism to  
2 limit each hunter to a single doe. However, under the  
3 Alaska Department of Fish and Game online permit  
4 system, hunters are provided with an electronic copy of  
5 their harvest tickets, which can be printed multiple  
6 times. This may reduce the enforcability of the use of  
7 the harvest ticket system to be used for harvest of a  
8 single doe, as users can easily print multiple copies  
9 of harvest ticket number five.

10

11 From 1997-2017, Ketchikan residents  
12 harvested an average of 783 deer per year from Unit 2.  
13 Assuming Ketchikan residents harvest does at similar  
14 rates as other Federally qualified users, an additional  
15 20 does may be harvested each year from Unit 2 by  
16 Ketchikan residents now that they will no longer be  
17 subject to the harvest limit restrictions for  
18 non-Federally qualified users.

19

20 In their discussion of this Special  
21 Action Request, the Southeast Council described the  
22 customary and traditional role of doe harvest in Unit 2  
23 communities, as well as its importance in providing  
24 food security as reasons for having reservations about  
25 eliminating the doe hunt. However, many members  
26 recognize that restricting doe harvest might be a  
27 necessary step to promote the recovery of the deer  
28 population.

29

30 Throughout their discussion, the  
31 Council made it clear that the motivating factor in  
32 requesting the special action was the anticipated  
33 increase in hunting pressure once Ketchikan residents  
34 were able to hunt in Unit 2 under Federal regulations.

35

36 The OSM conclusion is to oppose  
37 WSA25-02. The intent of the requested special action  
38 is to prevent or mitigate a conservation concern based  
39 on an expected increase in doe harvest when Ketchikan  
40 residents are able to harvest deer in Unit 2 under  
41 Federal regulations.

42

43 However, the estimated number of does  
44 harvested in Unit 2 each year is relatively small and  
45 the expected number of additional does that newly  
46 Federally qualified residents of Ketchikan might  
47 harvest is also low even when accounting for possible  
48 rates of unreported and illegal harvest. The Unit 2  
49 deer population is likely more limited by habitat loss,  
50

0066

1 predation and winter severity than by doe survival and  
2 productivity.

3  
4 The proposed special action would also  
5 prevent Unit 2 residents from harvesting does, which  
6 would eliminate an important customary and traditional  
7 opportunity for Prince of Wales residents and  
8 potentially decrease food security for some residents.

9  
10 In the submitted request the Southeast  
11 Council states that eliminating doe harvest may hurt  
12 Prince of Wales residents whose subsistence needs for  
13 deer are already not being met, but regulatory  
14 mechanisms do not currently allow for doe harvest by  
15 only a subset of subsistence users. However, the Board  
16 or Federal in-season management could address potential  
17 increases in doe harvest through emergency special  
18 action.

19  
20 That concludes the presentation.

21  
22 MADAME CHAIR PITKA: Thank you very  
23 much. I appreciate it. At this time I'd like to ask  
24 for the summary of tribal consultation from Mr. Orville  
25 Lind.

26  
27 MS. LAVINE: Madame Chair.

28  
29 MADAME CHAIR PITKA: Yes.

30  
31 MS. LAVINE: This is Robbin. I believe  
32 that some of the Board members may have questions for  
33 the analyst.

34  
35 MADAME CHAIR PITKA: Oh, my apologies.  
36 I don't know what I was thinking. Please ask your  
37 questions now.

38  
39 MR. CHEN: Madame Chair. BIA, please.

40  
41 MADAME CHAIR PITKA: Please, Mr. Chen.

42  
43 MR. CHEN: Thank you, Madame Chair.  
44 Dr. Roberts, what is the source of your information  
45 about the unreported harvest?

46  
47 MR. ROBERTS: This comes from ADF&G  
48 management reports.

49  
50

0067

1 MR. CHEN: Thank you for that.  
2 Appreciate it.

3  
4 MADAME CHAIR PITKA: Thank you. Any  
5 further questions.

6  
7 MR. ROBERTS: Oh, I should also add  
8 there's other evidence of that from studies of  
9 radio-collared deer and mortality associated with  
10 radio-collared deer.

11  
12 MR. CHEN: Thank you, Dr. Roberts.

13  
14 MADAME CHAIR PITKA: I appreciate that  
15 so much. Can I get the summary of Tribal Consultation  
16 now.

17  
18 MR. LIND: Thank you, Madame Chair.  
19 Can you hear me loud and clear?

20  
21 MADAME CHAIR PITKA: Loud and clear.

22  
23 MR. LIND: Thank you. So, again, on  
24 May 15th we conducted consultation in person in  
25 Hydaburg. For Wildlife Special Action 25-02 the  
26 Ketchikan Indian Community support this Special Action.  
27 Also residents from Kasaan were in support. Also the  
28 other member from Craig Tribal Council was in support  
29 of Special Action 25-02. The tribal chief from Craig  
30 was in opposition of 25-02.

31  
32 The tribal chief from Hydaburg stated  
33 that recent harvest data showed that it was -- it had  
34 been taking up to five days for an average hunter to  
35 successfully harvest a deer on Prince of Wales Island.  
36 However, it may take elders up to 10 days.

37  
38 Prince of Wales has an aging population  
39 overall and many of the older residents of Prince of  
40 Wales communities rely on hunting along the roads  
41 because it provides physically easier access. However,  
42 hunting competition along the road system have been  
43 increasing. He also shared that hopefully everyone can  
44 come to an understanding and really keep conservation  
45 in mind. The deer on the island feed everyone.

46  
47 He didn't particularly like the idea of  
48 supporting Wildlife Special 25-02 because of the  
49 elders' customary relationship with doe harvest.

50

0068

1     However, he supports it now because of the conservation  
2     need.

3

4                     Some other topics during that  
5     consultation would encourage subsistence users in the  
6     regions to consider looking into possible alternative  
7     ways to utilize customary and traditional uses with the  
8     USDA partnerships for those who live in the impacted  
9     areas. Also provide education and conservation and  
10    customary harvest data continuing to successfully work  
11    with the relationships with tribes.

12

13                    There are also further requests for  
14    government-to-government consultations between the  
15    Federal Subsistence Board and the Ketchikan Indian  
16    Community and also a request from the Craig Tribe.  
17    That concludes the consultation report, Madame Chair.

18

19                    MADAME CHAIR PITKA: Thank you very  
20    much, Orville Lind.

21

22                    MR. LIND: You're welcome.

23

24                    MADAME CHAIR PITKA: Are there any  
25    questions on the tribal consultation?

26

27                    (No comments)

28

29                    MADAME CHAIR PITKA: If not, I'd like  
30    to open the floor to tribes and ANCSA corporation  
31    testimony. I believe it's \*5 to raise and lower your  
32    hand and \*6 to mute and unmute your phone.

33

34                    Robbin, did we get any requests to  
35    testify?

36

37                    MS. LAVINE: Madame Chair, there's  
38    nobody in the que.

39

40                    MADAME CHAIR PITKA: Okay. At this  
41    time I'd like to open the floor to public testimony. I  
42    see somebody raised their hand. It's a number ending in  
43    07. Please proceed.

44

45                    MR. HERNANDEZ: Thank you, Madame  
46    Chair. Don Hernandez again, Point Baker on Prince of  
47    Wales Island, testifying as a member of the public and  
48    not as my role as Council Chair for the Southeast RAC.

49

50

0069

1 First of all I just want to start by  
2 saying that now that the Board has decided not to  
3 include management of does in your .804 determination I  
4 think it's vital that you support this proposal to  
5 close the doe season. I see this as really necessary  
6 for damage control.

7  
8 I read the analysis carefully and I  
9 agree with a lot of what it says, but I think it's a  
10 little bit too dangerous given the uncertainty as to  
11 what the newly eligible Ketchikan hunters what they  
12 might react to an ability to take does on Prince of  
13 Wales Island. I can see some real harm happening here  
14 if the season is not closed.

15  
16 So just as more kind of general  
17 comments, the doe season of course has always been  
18 pretty controversial on Prince of Wales. I personally  
19 have always had my reservations about having a doe  
20 season, but I've always supported any proposals to  
21 maintain it over the years because I do see it as an  
22 important customary and traditional practice. I think  
23 that's worth taking into consideration.

24  
25 However, ideally, going into the season  
26 I would have hoped that the Board would have  
27 essentially kind of maintained a status quo with the  
28 management where they might have taken an action that  
29 Unit 2 residents could still harvest a doe but limit  
30 Ketchikan residents to essentially what the situation  
31 has been up till now with a two buck limit and a no doe  
32 season, but your previous vote did not go that way.

33  
34 So now I think it's really important  
35 that you take a closer look at this doe hunt closure.  
36 I know when we discussed this at the Council level from  
37 my own personal feelings on this I was really concerned  
38 that the Board would not want to get too involved in an  
39 .804 prioritization at this time. I think that worry  
40 was kind of founded here by your recent vote.

41  
42 In that case I'd strongly urge the  
43 Council to approve this doe closure for all subsistence  
44 users as a conservation measure. Just given the  
45 uncertainty once again of what we might expect from an  
46 influx of Ketchikan hunters who are now eligible to  
47 take a doe.

48  
49 All the analysis shows of the take of  
50

0070

1 does is very small, although it's acknowledged that  
2 it's probably under-reported and I think both of those  
3 factors are the case. I know there's a real stigma  
4 attached to taking does by a lot of folks in the  
5 community.

6  
7 I know a lot of people just would never  
8 take a doe regardless of circumstances and yet there  
9 are those that are having a hard time meeting their  
10 needs. Given the availability of bucks, yes, they will  
11 take a doe and I wouldn't fault them for that. Maybe  
12 it goes unreported, maybe it doesn't. I still believe  
13 that the impact of the does that are harvested is not  
14 significant.

15  
16 On a typical day of hunting during the  
17 season I will see multiple does before I ever see a  
18 buck. Quite a few does as a matter of fact. I have  
19 ample opportunity to take a doe any time I want, but I  
20 always wait and, you know, try and harvest bucks only.  
21 I have never shot a doe on Prince of Wales Island in  
22 all the 40 years or so I've been hunting here.

23  
24 I know that's true of a lot of other  
25 people as well that say the same thing. So there's a  
26 certain amount of ethic involved with everybody's  
27 decisions to hunt and I can vouch for a lot of my local  
28 residents and their ethics. But, you know, I just  
29 really don't know how to judge Ketchikan.

30  
31 A factor I think might be considered is  
32 prior to Ketchikan getting its rural status they were  
33 only allowed to take two bucks on POW and their harvest  
34 limit was four in Unit 1. So that meant that if  
35 somebody were to go out hunting in their local area  
36 close to home, if they harvest a deer, a buck, then  
37 they only had one tag available to come to Prince of  
38 Wales Island.

39  
40 I think that was probably a further  
41 factor in the decline of participation on POW because,  
42 you know, there were opportunities to take a deer  
43 closer to home and that right away would eliminate  
44 really a lot of your opportunity on Prince of Wales.

45  
46 There's a lot of expense involved in  
47 coming over here and spending time hunting. You're not  
48 going to come for one deer if you've already harvested  
49 one close to home. But now, you know, they can harvest  
50

0071

1 up to five deer. One of them being a doe.

2

3

4 There again you have that same factor  
5 of the cost and effort involved to come to Prince of  
6 Wales Island to spend a week or so of hunting. If  
7 they're driven by the desire to bring home something  
8 for their efforts, yeah, there's going to be a lot of  
9 opportunities to take a doe and they just might take  
10 advantage of it. It's just a real uncertain situation.

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I do think that too many does being  
harvested right now, given the observed decline in the  
population, which everybody that lives and hunts here  
seems to agree that, you know, we're in a bad situation  
on the overall population. I just don't think that we  
can really tolerate that much, if any, of the increase  
in the doe harvest.

So I think with your previous vote to  
not change any of the regs for the newly qualified  
Ketchikan hunters I think you really need to do a  
special action for this season on the doe hunt. I will  
also point out one of your reasons for not wanting to  
take action on the other proposals, you know, given the  
timeframe here with the season opening a week from now.

But the doe season doesn't open up  
until October 15th, so I think there's plenty of  
opportunity to get the word out to everybody that doe  
hunting would be closed and it wouldn't have a huge  
impact.

I did see a fair amount of support from  
local people on the island, both tribal and non-tribal  
with closing the doe season. Once again that's a  
proposal that's going to come before the Council in  
October. I would anticipate a lot of discussion on it.  
It will all be in relation to our .804 determination  
prioritization proposal.

So I think at this point right now it's  
really important that you take action and close the doe  
season. Thank you. That's all I have.

MADAME CHAIR PITKA: Thank you very  
much, Mr. Hernandez for your comments. Does anybody  
else have any comments under public testimony?

0072

1 MS. LAVINE: As a reminder, if you want  
2 to address the Board you can press \*5 to raise your  
3 hand. We have another person in the cue. Please state  
4 your name and address the Board. So, person, you're  
5 recognized or you're identified as an unknown user and  
6 your mic is muted. You can press \*6 to unmute your  
7 microphone if you are joining by phone. There you go.  
8 Go ahead and address the Board.

9  
10 MS. PHILLIPS: Patricia Phillips,  
11 Pelican, Alaska. I do not support eliminating the  
12 Federal doe hunt in Unit 2 for the 2025-26 regulatory  
13 year. The Staff analysis is culturally responsive to  
14 the continuation of the customary and traditional doe  
15 harvest as a means of supporting a Federally-qualified  
16 rural residents harvest and use of a wildlife resource  
17 to meet their food security needs.

18  
19 Although this is my individual  
20 statement I would say on page 10 of the Staff analysis  
21 this is my statement at the SERAC 2025 meeting. I  
22 appreciate the table on page 9 that estimates number of  
23 hunters and harvest of does.

24  
25 Having served for as long as I have on  
26 the Subsistence Advisory Council for Southeast, I've  
27 heard numerous testimonies from the public, some from  
28 customary and traditional harvesters. I heard a comment  
29 during the earlier analysis about making criminals of  
30 our residents. To eliminate the doe harvest could  
31 possibly be turning someone into a criminal when  
32 they're just trying to feed their family. That's what  
33 my greatest concern is.

34  
35 That's all I have to say.

36  
37 Thank you very much.

38  
39 MADAME CHAIR PITKA: Thank you very  
40 much for your comment today. Are there any other  
41 comments on WSA25-02 under public testimony?

42  
43 MS. LAVINE: Madame Chair, there is no  
44 one else in the cue.

45  
46 MADAME CHAIR PITKA: Thank you so much.  
47 Okay. At this time I'd like the Alaska Department of  
48 Fish and Game comments. Mr. Ben Mulligan.

49  
50



0073

1 MR. MULLIGAN: Thank you, Madame Chair.  
2 Again, for the record, my name is Ben Mulligan, Deputy  
3 Commissioner for the Alaska Department of Fish and  
4 Game.

5  
6 The Department supports limiting the  
7 doe season in Unit 2. If the Board is looking for a way  
8 to increase recruitment for the deer population on  
9 Prince of Wales Island, this would be a more effective  
10 tool to do so. We understand that the doe harvest is  
11 small, but it would do more for that population than  
12 restrictions.

13  
14 I will say if the Board does choose to  
15 pass this, similar to my comment for 01 03, a full  
16 court press of communication would need to occur so  
17 that everyone is well aware of this so that Federally  
18 qualified users know of the change.

19  
20 Again, if the Board is seeking a way to  
21 increase the population and increase recruitment into  
22 the Unit 2 deer population, passing this special action  
23 would be a good start for long-term increase.

24  
25 Thank you.

26  
27 MADAME CHAIR PITKA: Thank you so much,  
28 Mr. Mulligan. I appreciate that. Does anybody have  
29 any questions for the State of Alaska at this time?

30  
31 MS. BOARIO: Madame Chair. Fish and  
32 Wildlife Service.

33  
34 MADAME CHAIR PITKA: Please proceed,  
35 Member Boario.

36  
37 MS. BOARIO: Thank you, Madame Chair.  
38 Mr. Mulligan, I was reading in the State's testimony,  
39 and correct me if I'm wrong, the State has not provided  
40 a doe opportunity since 1978. Am I reading that  
41 correctly?

42  
43 MR. MULLIGAN: Through the Chair,  
44 Member Boario. Just a second to refresh. There's a  
45 lot of -- our comments were not insignificant, so I'm  
46 trying to find that in the history. I don't see where  
47 we said anything about 1970 -- oh, yeah. So the State  
48 removed the doe harvest in GMU-2 in 1978. So, yes. To  
49 reiterate and confirm that is correct. Apologies for  
50

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1 that.

2

3

MS. BOARIO: No, no. That's okay. I appreciate the robust information here. Can you share more about why the State has retained that for so long and maybe what you've learned over these many years?

7

8

MR. MULLIGAN: Specifically I will say area Staff and myself did not have a discussion about that. In general, as in all ungulate populations that we harvest, not having a doe harvest means a higher level of recruitment into that population, which means we can sustain a more robust harvest of said population.

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You know, at certain points you're probably familiar with when we do reach certain thresholds in our ratios or our population overall it may reach that point, but overall we keep doe harvest prohibited so that we can provide more opportunity on the males of the species.

MS. BOARIO: Thank you, Mr. Mulligan. I have another question. Do you have any thoughts -- I mean just what would a two-year closure of the doe hunt do? I mean would it be enough time to see some differences? Just again to your comments about the timing of this public process and being able to -- for people to be educated and know what's happening. You know, we have another meeting coming up in April. So is there -- what might a two-year closure do?

MR. MULLIGAN: Through the Chair, Member Boario. A two-year closure would be a good start. We'll also weigh in on the proposals that have been referenced. If all that happened was a two-year prohibition, I don't think -- well, I should not speculate, but there's probably -- I would say there's a good chance that you wouldn't see a real noticeable difference. You've got to give that time to work.

Knowing that when we were also working on this we know that there was a wildlife proposal of the same measure. We figured that this was kind of just something that we could get going on sooner rather than later.

MS. BOARIO: That's very helpful. Thank you, Mr. Mulligan. No more questions, Madame

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1 Chair.

2

3 MADAME CHAIR PITKA: Thank you for the  
4 question. Does anybody else have any questions.

5

6 (No comments)

7

8 MADAME CHAIR PITKA: If not, I'd like  
9 to ask for the Interagency Staff Committee  
10 recommendations. Robbin LaVine, please.

11

12 MS. LAVINE: Thank you, Madame Chair.  
13 Members of the Board. This is Robbin LaVine, chair of  
14 the Interagency Staff Committee. The Interagency Staff  
15 Committee recommends opposing Wildlife Special Action  
16 25-02.

17

18 The Southeast Alaska Subsistence  
19 Regional Advisory Council submitted WSA25-02 as a  
20 preemptive measure against the possibility of increased  
21 doe harvest by Ketchikan hunters if Ketchikan is  
22 designated rural.

23

24 The Council acknowledged that people  
25 living in some Prince of Wales Island communities  
26 regularly harvest does to meet their subsistence needs  
27 for deer. Overall, however, the Council agreed that  
28 they were willing to temporarily stop harvesting does  
29 to protect the long-term conservation of the deer  
30 population on Prince of Wales Island.

31

32 If a conservation concern for the local  
33 deer population occurs, a closure to doe harvest for  
34 all users is the first course of action that wildlife  
35 managers should consider. By not harvesting female  
36 deer higher rates of reproduction and subsequent  
37 recruitment into the population are likely.  
38 Implementation of a short-term moratorium on doe  
39 hunting to all users may result in an increase in the  
40 overall deer population size and benefit all users.

41

42 However, under current high harvest  
43 limits and no imminent conservation concern for the  
44 deer on Prince of Wales Island, the ISC does not  
45 recommend eliminating the Federal doe hunt in Unit 2  
46 for the 2025-2026 season. If a problem becomes  
47 apparent during the 2025 hunting season, excessive deer  
48 harvest for example, then the Board or in-season  
49 manager can adjust hunt opportunities under an

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1 emergency special action.

2

3 Thank you, Madame Chair.

4

5 MADAME CHAIR PITKA: Thank you for the  
6 ISC recommendation. Does anybody have any questions.

7

8 MS. BOARIO: Madame Chair, Fish and  
9 Wildlife Service.

10

11 MADAME CHAIR PITKA: Yes. Please go  
12 ahead.

13

14 MS. BOARIO: Robbin, could you clarify.  
15 Could the in-season manager close specifically to does  
16 if needed?

17

18 MS. LAVINE: That is -- I would have to  
19 ask the in-season manager if closing the doe hunt is  
20 part of their delegated authority or maybe OSM staff  
21 can clarify.

22

23 (No comments)

24

25 MS. LAVINE: Madame Chair -- Sara  
26 Boario, through the Chair. I think that's a really good  
27 question and I would like to see if we can chase down  
28 that answer. Forest Service Manager Robert Cross has  
29 his hand raised. Rob, could you answer this question?  
30 Thanks.

31

32 MR. CROSS: Yes. For the record, my  
33 name is Rob Cross. I'm the subsistence program manager  
34 for the Tongass with the Forest Service. I'm just  
35 reading the scope of Delegation of Authority for Prince  
36 of Wales and it says you may set harvest quotas and  
37 close, reopen or adjust Federal subsistence deer  
38 seasons and adjust harvest and possession limits for  
39 that species. You may also close Federal public lands  
40 to take of the species for all users. So I believe  
41 that you would be able to adjust the quota to zero for  
42 does.

43

44 MS. BOARIO: Robert, sorry. That was  
45 you would or wouldn't be able to adjust for does? It  
46 was a little hard to hear.

47

48 MR. CROSS: I believe that you would be  
49 able to close the doe harvest through the Delegation of  
50

0077

1 Authority letter, but OSM can correct me if I'm  
2 incorrect.

3

4 MS. BOARIO: Okay. Thank you very  
5 much.

6

7 MADAME CHAIR PITKA: Thank you. And  
8 thank you for the questions and answers. Is there any  
9 further -- Lisa Grediagin has something to add.

10

11 MS. GREDIAGIN: Lisa Grediagin for the  
12 record. I was just going to confirm that, yes, the  
13 in-season manager has delegated authority to adjust  
14 harvest limits. So when you adjust to a harvest limit  
15 that generally includes setting sex restrictions. So  
16 whether it's four deer and one -- within the parameters  
17 of regulations. So, yeah, they could restrict it to  
18 bucks only.

19

20 MADAME CHAIR PITKA: Thank you for that  
21 answer. I hope that answered all of your questions,  
22 Member Boario.

23

24 MS. BOARIO: Very helpful. Thank you,  
25 everyone.

26

27 MADAME CHAIR PITKA: Thank you. So at  
28 this time Board discussion with the Council Chairs and  
29 State Liaison.

30

31 (No comments)

32

33 MADAME CHAIR PITKA: Okay. Is there  
34 any further questions for State of Alaska or Council  
35 Chair?

36

37 (No comments)

38

39 MADAME CHAIR PITKA: I'm not seeing any  
40 hands raised. So at this time I'd like to open the  
41 floor for a Board motion, discussion and action. Thank  
42 you.

43

44 MS. GREWE: Nicole Grewe, Acting  
45 Regional Forester for the Forest Service. I have a  
46 bulletin for you.

47

48 MADAME CHAIR PITKA: Please, go ahead.

49

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0078

1 MS. GREWE: Thank you. Madame Chair, I  
2 move to adopt Wildlife Special Action 25-02. If I get  
3 a second, I'll explain why I intend to oppose my  
4 motion.

5  
6 With that, I'll pause for a second.

7  
8 MR. PENDERGAST: BLM seconds.

9  
10 MADAME CHAIR PITKA: Thank you, BLM.  
11 Please proceed.

12  
13 MS. GREWE: Thank you. Madame Chair  
14 and members of the Board. I would again like to thank  
15 the Southeast Alaska Subsistence Regional Advisory  
16 Council for their concern for deer population on Prince  
17 of Wales Island. As well as for their desire to ensure  
18 Federally qualified users in small Prince of Wales  
19 communities meet their subsistence needs for deer.

20  
21 As I explained in our justification for  
22 Wildlife Special Actions 25-01 and 25-03, the Forest  
23 Service believes that it is premature to implement  
24 regulations to preemptively close doe hunting to all  
25 users as requested by 25-02 until after Ketchikan  
26 becomes rural and hunter effort and harvest success is  
27 documented under the new Federal regulations.

28  
29 As stated by the Interagency Staff  
30 Committee, if a conservation concern for local deer  
31 population occurs, a closure to doe harvest for all  
32 users is the first course of action that wildlife  
33 managers should consider. Implementation of a  
34 short-term moratorium on doe hunting to all users may  
35 result in an increase in the overall deer population  
36 size and benefit to all users.

37  
38 However, under current high harvest  
39 limits and no imminent conservation concern for the  
40 deer, the Prince of Wales deer population, the  
41 Interagency Staff Committee does not recommend  
42 restricting doe hunting by non-Federally qualified  
43 users. If a problem becomes apparent during the  
44 season, i.e. excessive deer harvest, then the Board or  
45 an in-season manager can adjust hunt opportunities  
46 under an emergency special action.

47  
48 Thank you, Mr. Chair and members of the  
49 Board.  
50

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1 MADAME CHAIR PITKA: Thank you very  
2 much. Now we are under Board discussion.

3  
4 (No comments)

5  
6 MADAME CHAIR PITKA: Okay. Hearing no  
7 Board discussion, can we have a roll call vote, please.

8  
9 MS. LEONETTI: Yes. Thank you, Madame  
10 Chair. We are going to start with the Forest Service,  
11 Nicole Grewe.

12  
13 MS. GREWE: Thank you. The Forest  
14 Service opposes WSA25-02. Thank you.

15  
16 MS. LEONETTI: Thank you, Ms. Grewe.  
17 Fish and Wildlife Service, Sara Boario.

18  
19 MS. BOARIO: The Fish and Wildlife  
20 Service opposes WSA25-02 based on the justification  
21 provided by the Forest Service and the Interagency  
22 Staff Committee. While the closure to doe hunting  
23 would be appropriate for addressing conservation  
24 concerns, and I am compelled by the State's comments  
25 and written testimony, I would like to see more public  
26 process. I am particularly concerned about an abrupt  
27 change without sufficient time to communicate that.

28  
29 This proposal will also be before the  
30 Board at the April 2026 meeting and the Board would  
31 benefit from this proposal going through that more  
32 robust public process.

33  
34 I am glad to learn the in-season  
35 manager can address conservation concerns raised by  
36 some today if necessary through special action by  
37 adjusting harvest limits, which means also allowing sex  
38 restrictions.

39  
40 Thank you.

41  
42 MS. LEONETTI: Thank you, Ms. Boario.  
43 National Park Service, David Alberg.

44  
45 MR. ALBERG: Yes. Madame Chair, the  
46 National Park Service opposes WSA25-02 for the reasons  
47 stated by the Forest Service. Under current high  
48 harvest limits of five deer only, one of which may be a  
49 doe, and no imminent conservation concern for the deer  
50

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1 population on Prince of Wales Island, eliminating the  
2 Federal doe harvest in Unit 2 for the 2025-2026 season  
3 is not necessary at this time.  
4

5 As noted previously, if a problem  
6 becomes apparent during the season such as excessive  
7 doe harvest, then the Board or in-season manager can  
8 adjust the hunt opportunities under an emergency  
9 special action.  
10

11 Thank you.  
12

13 MS. LEONETTI: Thank you, Mr. Alberg.  
14 Public Member Ben Payenna.  
15

16 MR. PAYENNA: I vote to oppose  
17 WSA25-02.  
18

19 MS. LEONETTI: Thank you, Mr. Payenna.  
20 Bureau of Indian Affairs, Glenn Chen.  
21

22 MR. CHEN: The BIA votes to reject  
23 WSA25-02. We concur with the justification provided by  
24 the U.S. Forest Service. Gunalcheesh.  
25

26 MS. LEONETTI: Thank you, Mr. Chen.  
27 Bureau of Land Management, Kevin Pendergast.  
28

29 MR. PENDERGAST: BLM votes to oppose  
30 WSA25-02. Like the Forest Service and other  
31 commenters, I acknowledge the concerns stated by the  
32 Southeast Council and by today's commenters for the  
33 continued health of the Unit 2 deer population.  
34

35 I also appreciate the Alaska Department  
36 of Fish and Game's comments. In particular, the  
37 historical perspective regarding the issue of doe  
38 harvest in Unit 2. However, given the preemptive  
39 nature of this particular request and the relatively  
40 limited impact of any temporary closure on what is a  
41 longer term broader concern, BLM opposes WSA25-02.  
42

43 Thank you.  
44

45 MS. LEONETTI: Thank you, Mr.  
46 Pendergast. Chair Rhonda Pitka.  
47

48 MADAME CHAIR PITKA: I also vote to  
49 oppose, concurring with the justification provided by  
50



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1 the Forest Service. Thank you.

2

3 MS. LEONETTI: Thank you, Ms. Pitka.

4 So the motion to support Wildlife Special Action 25-02

5 fails unanimously. Thank you, Madame Chair.

6

7 MADAME CHAIR PITKA: Thank you very  
8 much. Thank you, everybody, for your comments and all  
9 of your helpful suggestions today. At this time I'd  
10 like to entertain a motion to adjourn.

11

12 MS. BOARIO: Fish and Wildlife Service  
13 moves to adjourn.

14

15 MADAME CHAIR PITKA: Thank you very  
16 much. Can I get a second?

17

18 MR. PENDERGAST: Second from BLM.

19

20 MADAME CHAIR PITKA: Thank you, BLM.  
21 All in favor say aye.

22

23 IN UNISON: Aye.

24

25 MADAME CHAIR PITKA: Thank you,  
26 everyone. Have a good day.

27

28 (Off record)

29

30 (END OF PROCEEDINGS)

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1 C E R T I F I C A T E

2

3 UNITED STATES OF AMERICA )

4 ) ss.

5 STATE OF ALASKA )

6

7 I, Salena A. Hile, Notary Public in and for the  
8 state of Alaska and reporter for Computer Matrix Court  
9 Reporters, LLC, do hereby certify:

10

11 THAT the foregoing pages contain a full, true  
12 and correct Transcript of the FEDERAL SUBSISTENCE BOARD  
13 WORK SESSION taken electronically on the 17th day of  
14 July 2025;

15

16 THAT the transcript is a true and correct  
17 transcript requested to be transcribed and thereafter  
18 transcribed by under my direction and reduced to print  
19 to the best of our knowledge and ability;

20

21 THAT I am not an employee, attorney, or party  
22 interested in any way in this action.

23

24 DATED at Anchorage, Alaska, this 27th day of  
25 July 2025.

26

27

28

29 \_\_\_\_\_  
30 Salena A. Hile  
31 Notary Public, State of Alaska  
32 My Commission Expires:09/16/26

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