WCR26–01 Executive Summary	
General Description	WCR26-01 is a standard review of a Federal subsistence wildlife closure to the harvest of deer by non-federally qualified users (NFQUs) on Federal public lands in a portion of Prince of Wales Island in Unit 2 from Aug. 1-15. WCR26-01 also reviews the two buck harvest limit restriction for NFQUs in all of Unit 2.
Current Regulation	**Unit 2 - Deer** *5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct.15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.* — *Jul. 24 – Jan. 31* *Federal public lands on Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 - Aug. 15, except by Federally qualified subsistence users hunting under these regulations.* *Non-federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*
OSM Preliminary Conclusion	**Retain Status Quo**
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 comment submitted** See Written Public comments on Wildlife Proposal and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

DRAFT WILDLIFE CLOSURE REVIEW
WCR26-01

ISSUE: WCR26-01 is a standard review of a Federal subsistence wildlife closure to the harvest of deer by non-federally qualified users (NFQUs) on Federal public lands in a portion of Prince of Wales Island (POW) in Unit 2 from Aug. 1-15. WCR26-01 also reviews the two buck harvest limit restriction for NFQUs in all of Unit 2 (see **Map 1**). It is the Federal Subsistence Board's (Board) policy that Federal public lands should be reopened when a closure is no longer necessary, and that closures will be reviewed at least once every four years. The purpose of this review is to determine if the August closure and harvest limit restriction to NFQUs on POW is still warranted.

Closure Location and Species: Unit 2, Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait) (Unit 2 POW) – Deer

Closure Dates: August 1 – August 15; two buck harvest limit restriction: year-round

Current Federal Regulations

Unit 2—Deer

5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct.15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.	*Jul. 24 – Jan. 31*
Federal public lands on Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 - Aug. 15, except by Federally qualified subsistence users hunting under these regulations.	
Non-federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.	

Current State Regulations

Unit 2−Deer

Residents and Nonresidents: 4 Bucks	*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.* *In all hunts limited to one sex, evidence of sex must remain naturally attached to the meat or antlers must remain naturally attached to the entire carcass, with or without viscera.*	*HT*	*Aug. 1 – Dec. 31*

Regulatory Year Initiated: 2003: Closure on POW from Aug. 1-21; 2004: Closure on POW from Aug. 1-15; 2006: Closure on northwest portion of POW from Aug. 1-15; 2018: NFQUs harvest limit reduced to 2 bucks in Unit 2.

Closure last reviewed: 2022 - WCR22-01

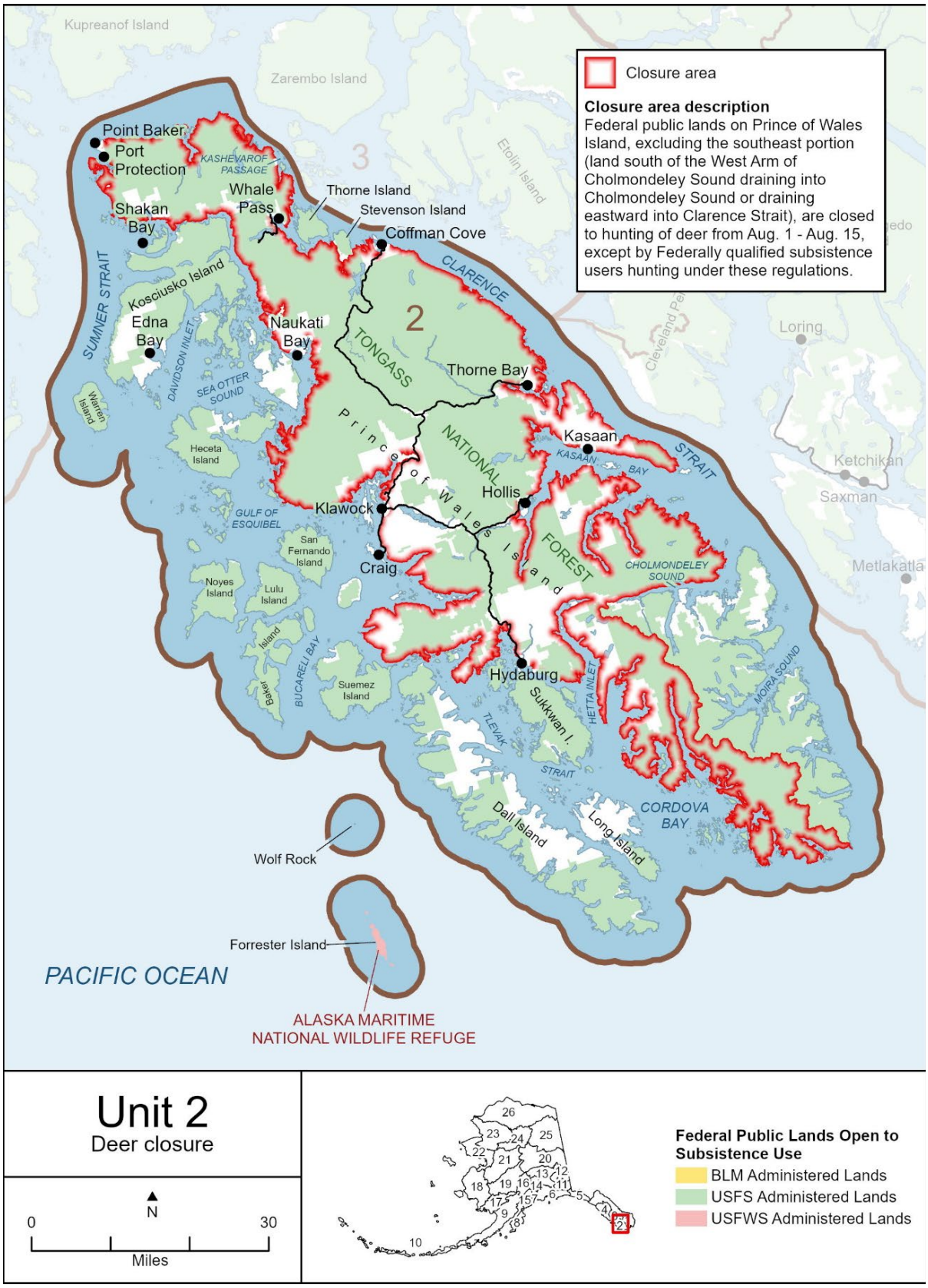
Justification for Original Closure

Section 815(3) of ANILCA states:

> *Nothing in this title shall be construed as – (3) authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on public lands (other than national parks and monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law…*

The Federal Subsistence Board (Board) adopted Proposal WP03-05 with modification to close Federal public lands on POW to deer hunting by NFQUs for one regulatory year from Aug. 1 – Aug. 21, 2003, for the continuation of subsistence uses. A number of interrelated reasons were discussed as justification for the closure, including: a long-term trend of declining deer habitat (only 6% of clearcuts remained "huntable"); declining deer populations; increasing hunter participation; and increasing competition between user groups, resulting in decreased subsistence opportunity. Many of these issues were cited as being particularly prevalent in the most road-accessible portions of POW.

In 2004, the Board adopted Proposal WP04-15, reducing the closure period to Aug. 1-15 and maintaining the closure in codified regulations indefinitely with no sunset clause.



Map 1. Deer Closure on Federal Public Lands in Unit 2.

Council Recommendation for Original Closure

Support: The Southeast Alaska Subsistence Regional Advisory Council (Southeast Council) supported the original proposal (WP03-05) with modification to close Federal public lands to NFQUs from Aug. 1-Aug. 10, instead of Aug. 1- Sept.1 as proposed, and reduce the harvest limit for NFQUs hunting in Unit 2 from four deer to two deer. The Council concluded that there was substantial evidence that the deer population on POW had declined and that this decline was likely to continue as habitat changes persisted.

State Recommendation for Original Closure

Oppose: The State noted that the Board is not authorized to regulate non-federally qualified users in the manner requested in WP03-05 as it was submitted (reducing NFQU's harvest limits). In November 2002, the Alaska Board of Game (BOG) rejected a proposal to reduce the harvest limit for deer in Unit 2 from 4 to 2 bucks, concluding that a reduction in harvest opportunity was not needed for conservation reasons at that time. They noted that hunters may have reported seeing fewer deer in the area as a result of thicker secondary growth in the abundant clearcuts on POW.

Extent of Federal Public Select Land or Water

Unit 2 is made up of approximately 74% Federal public lands, consisting of 73% U.S. Forest Service (USFS) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (**Map 1**).

Customary and Traditional Use Determination

Rural residents of Units 1, 2, 3, 4 and 5 have a customary and traditional use determination for deer in Unit 2.

Regulatory History

Please see the analysis for WP26-03/04/05 for a comprehensive regulatory history for deer in Unit 2.

Current Events

Please see the analysis for WP26-03/04/05 for a full description of current events related to Unit 2 deer, including summaries of the public hearing, Tribal consultation, Board decision on recent special action requests regarding Unit 2 deer (WSA25-01/-03 and WSA25-02), and recently submitted requests for reconsideration on the Ketchikan rural determination (NDP25-01).

Biological Background

Please see the analysis for WP26-03/04/05 for a comprehensive biological background for deer in Unit 2.

Cultural Knowledge and Traditional Practices

POWI composes the vast majority of Unit 2. People have made their living on POWI harvesting a variety of fish, wildlife, and plant resources for generations (Goldschmidt and Haas 1998; Gillispie 2018). Archaeological evidence indicates that POWI has been inhabited by humans for approximately 10,000 years, with the earliest human remains found at On Your Knees Cave, on the northern side of POWI (Sill 2017). Strong evidence exists to suggest that people living in the Southeast region relied heavily on marine resources like fish, shellfish, and marine mammals during the Early Holocene period, with many archaeological sites from this period located near tidewaters (Gillispie 2018). Around 5,200 years ago, archaeological evidence of larger and more permanent settlements appears (Gillispie 2018). Bones and shells excavated from middens (refuse disposal areas) at these sites show that deer, bears, harbor seals, sea otters, whale, four species of salmon, fourteen marine fish species, and at least twenty-one species of shellfish were important to local diets and economies in the region (Gillispie 2018).

In the historical period, POWI was initially occupied and controlled by the Tlingit (Grant and Sill 2017). However, in the late 1700s and early 1800s, the Kaigani Haida emigrated to southern POWI from Haida Gwaii in what is now British Columbia (Grant and Sill 2017). Some sources state that Haida territory came to include POWI south of the Klawock River across to Thorne Bay, part of Heceta Island, and all of Noyes, Lulu, San Fernando, Suemez, and Dall islands, while others consider Haida territory to begin further south on POWI (Moss 2008).

There are currently eleven communities on POWI, with an additional community, Edna Bay, located on nearby Kosciusko Island. Shakan Bay is a former community on POWI, which does not currently have any residents (ADCCED 2025). POWI is only accessible by plane or boat. Many of the larger and/or older communities on POWI today such as Craig, Klawock, Kasaan, and Hydaburg are located on or near former Tlingit and Haida villages or camps (Goldschmidt and Haas 1998). Several of the newer and/or smaller communities on POWI such as Thorne Bay, Whale Pass, and Naukati Bay are the site of former logging camps that were permanently settled by loggers and homesteaders from the continental U.S. through State land selection programs in the mid-to-late 1900s (ADCCED 2025; see also **Table 1**).

Most POWI communities have been heavily involved in the commercial fishing, fish processing, and/or timber industries since the late 1800s or early 1900s (ADCCED 2025). Many POWI residents continue to combine work in these industries with extensive subsistence harvesting for their livelihoods (ADCCED 2025; see also **Tables 3** & **4**). According to local ecological knowledge, hunter harvest data, and comprehensive subsistence surveys, deer continue to be a key component of POWI residents' subsistence harvests (SERAC 2025).

<u>Subsistence Harvest and Resource Use in Unit 2</u>

As **Tables 3** and **4** illustrate, deer has been the most significant terrestrial source of meat for POWI residents for the past several decades for which data has been collected (see also Brinkman et al. 2009; OSM 2023a, 2023b). Since the 1980s, deer has consistently ranked as one of the top resources in terms

of bulk contribution to local subsistence harvests on POWI, at times trailing only salmon, non-salmon fish, and/or marine invertebrates (ADF&G CSIS 2025). A study by Brinkman and colleagues (2009) suggests that previous intensive logging on POWI increased access to and availability of deer through forest habitat change and the construction of logging roads. They note that these changes may have led POWI residents to focus even more of their subsistence efforts on deer during the roughly 40-year logging period (Brinkman et al. 2009). However, now that many of these previously logged areas have entered the stem-exclusion phase of forest regrowth and some logging roads have been closed or are in poor condition, the POWI landscape may not be as conducive to deer populations or efficient hunting opportunities as it was previously (Brinkman et al. 2009). Further, as Hasbrouck (2023) explains, hunting pressure and harvest is not spread evenly across the POWI landscape. From 2016-2020, "fifty percent of deer were harvested on twenty percent of the land in Unit 2," as most people tended to harvest large land mammals close to roads, rivers, and/or their communities (Hasbrouck 2023: 12). The Wildlife Analysis Areas (WAAs 1315, 1318, 1319, 1420, and 1422) receiving the greatest harvest pressure at this time were those in and around Coffman Cove, Thorne Bay, Craig, and Klawock (Hasbrouck 2023). Today, POWI hunters may be feeling the combined effects of road closures and increasing stem-exclusion forest near their homes, while also continuing to adapt to the loss of jobs in the timber and commercial fishing industries. An ageing population of local users may further contribute to the difficulties of harvesting sufficient deer in this landscape.

Still, deer are the most extensively harvested big-game species for both subsistence and sport hunters in Southeast Alaska, and replacing deer meat with store-bought foods during times of harvest difficulty can represent a substantial cost for POWI households, particularly lower income households (Brinkman et al. 2009). A correlation has previously been shown between rising poverty levels and increasing deer harvest rates in POWI communities (Mazza 2003). This correlation suggests that successful deer hunting is particularly important for lower-income POWI households, and many other lower-income households throughout the Southeast Region. It is also important to note that communities in Unit 2 have consistently exhibited some of the lowest average median household incomes and highest average poverty rates in Southeast Alaska across the past three census analysis periods (see **Table 2**). The most recent comprehensive subsistence surveys conducted on POWI took place in Whale Pass and Hydaburg in 2012. The results of these surveys are discussed in detail below. Summary results for comprehensive subsistence surveys conducted in other POWI communities in the 1980s and 1990s can be found in **Tables 3** and **4**.

Whale Pass

The most recent comprehensive subsistence surveys conducted on POWI took place in Whale Pass (Sill 2017) and Hydaburg (Grant and Sill 2017) during the 2012 harvest season. Deer were one of the most harvested and utilized subsistence resources in each community, composing an estimated 91% of the large land mammal harvest in Whale Pass (Sill 2017), and 100% of the large land mammal harvest in Hydaburg at this time (Grant and Sill 2017). In Whale Pass, 25% of responding households stated that they used roughly the same amount of large land mammals in 2012 as they had in previous years, while 60% noted using less, and 15% noted using more (Sill 2017). The most frequently cited reason (55%) for using less large land mammals in Whale Pass was that the resource was less available in

2012 (Sill 2017). Surveyed Whale Pass households that reported using more large land mammals noted that they did so because of increased effort (33%), increased need (33%), or because they used more deer instead of other resources (33%) (Sill 2017). Still, of the 38% of Whale Pass households that stated that they did not get enough subsistence resources in 2012, deer was the resource that these households most frequently reported needing more of (37%) during the year (Sill 2017). "When asked to evaluate the impact of not getting enough large game, 60% described the impact as minor, 30% explained that not getting enough large land mammals had a major effect on their household, and 10% stated that the impact was severe. Households that did not get enough large land mammals adapted by using more commercial foods" (Sill 2017: 339).

Though Whale Pass households were considered to have generally high or marginal levels of food security in 2012, Sill (2017: 292) found that access to subsistence resources throughout the year appeared to be a greater food security issue for residents than access to store-bought foods, even though the closest grocery store was several hours away by car. December and January were the months noted by food insecure households as being the most problematic, because hunting and fishing is more difficult in the winter and roads to larger communities and stores are often in poor condition (Sill 2017). Many Whale Pass survey respondents noted concerns about the impacts of non-local hunters, as well as hunting violations and inadequate enforcement on what they perceived to be a declining POWI deer population (Sill 2017). This suggests that the apparent decline of the Unit 2 deer population noted in the harvest history section as beginning around 2015, was evident to local users earlier than what might be inferred from harvest data only.

Hydaburg

In Hydaburg, Grant and Sill (2017) noted that 53% of responding households stated that they used roughly the same amount of large land mammals in 2012 as they had in previous years, while 30% noted using less, and 11% noted using more. The most frequently cited reason (29%) for using less large land mammals in Hydaburg was less sharing (Grant and Sill 2017). Hydaburg households that stated that they used more large land mammals in 2012 noted that they did so because they needed more (60%), received more (40%), or because the resource was more available (20%) (Grant and Sill 2017). Still, of the 29% of Hydaburg households that stated that they did not get enough subsistence resources in 2012, deer was the resource that these households most frequently reported needing more of (35%) during the year (Grant and Sill 2017). When asked to evaluate the impact of not getting enough large land mammals in 2012, approximately 67% of Hydaburg households described the impact as minor, 20% explained that not getting enough large land mammals had a major effect on their household, and 13% stated that the impact was severe (Grant and Sill 2017).

Still, the percentage of surveyed Hydaburg households reporting food insecure conditions (21%) was almost twice the average for the State of Alaska (12%) (Grant and Sill 2017). Some of these conditions included worrying about having enough food, lacking the resources to get store-bought and/or subsistence foods, and running out of food (Grant and Sill 2017). "More than twice as many households experienced times where subsistence foods did not last, in comparison to times when store-bought foods did not last" (Grant and Sill 2017: 369). Like Whale Pass, food insecure conditions

tended to peak in Hydaburg during the winter months (Grant and Sill 2017). As Grant and Sill explained (2017: 369), "given the seasonal availability of subsistence foods and employment in the area, it seems reasonable that food insecure conditions increase during the months when subsistence harvests and employment are low."

Like Whale Pass, many Hydaburg survey respondents noted concerns about the amount of competition and harvest taken by non-local deer hunters on POWI (Grant and Sill 2017), before the most recent harvest restrictions were put in place for NFQUs in 2018 (SERAC 2017a, 2017b). Similarly, as a representative of the Hydaburg Cooperative Association noted during testimony at a 2017 Southeast Council meeting, recent problems with deer harvests on POWI include a number of interrelated factors, such as: increasing competition with non-local hunters, high populations of predators like wolves and bears, declining road access, and changing forest habitat and reductions in the number of deer on the landscape and/or changes in the location of deer on the landscape (SERAC 2017a). He explained (SERAC 2017a: 161 & 171-172):

> I can speak for Hydaburg when I say that the deer harvest this year did not even come close to meeting the needs of our community. This year [2016 hunting season] was probably the hardest year I've seen for deer in all the time I've been hunting. And we've seen a lot of wolf, and, we all know the hunting pressure on the island has increased tenfold in the last ten years. And then you couple that with reduced access. Again, that was adding access through logging, but it reduced after they cut down a bunch of roads which bottlenecked a lot of people to a lot less roads on the island. And then you couple that with some of the ANCSA corporations not doing any kind of land management practices. We're ending up with biological deserts in our area, namely Deer Bay and the Chomley area that are almost inaccessible to hunting either by road or even through a clear cut. And so, we can either hunt the beach or we can muscle our way up to the top of an alpine area, but anything in between is pretty much off the hunting area and, we've gotten so much pressure in our area from outside hunters that the land manager for the Haida Corporation cut off access to the land this year and was strongly urging SEALASKA to do the same, due to the inability of the shareholders and community members to get enough deer..
>
> And so, access has been an issue. Increased pressure and competition between user groups. You know, it's tough. You can go from Hydaburg to the cutoff and there will be 30 cars parked on the side of the road. That's one area – 0.7 miles. And that's a reality. You can go down Soda Bay. Last year, you needed a stop sign to keep up with the traffic driving down there during the rut because it's renowned for the big bucks that we have. You know, we went down one day to count the cars – 32 cars down Soda Bay one day hunting. Now, that really lowers the success rate of your community to meet its needs when there's 32 other trucks driving with four guns poking out all four windows, looking for the same deer you are. And it just gets to be a little bit disheartening when you have two days on the weekend to do it because we are working citizens as well. Or taking the time off to do it. And we are meeting a large competitive hunter out there. And again, like you said, we're not above sharing the resource or finding common ground to make sure everybody has access, but that's the issues we're hearing from our community members.

Hydaburg residents also voiced more general concerns for the future about the availability of subsistence foods, ongoing competition with outside influences, and climatic/ environmental changes resulting in warmer winter weather and stronger storms (Grant and Sill 2017). Likewise, a recent research project investigating the perceptions and impacts of changing weather patterns in eleven communities in Southeast Alaska (three in Unit 2) and northern British Columbia revealed significant environmental changes over research participants' lifetimes, including accelerating changes to weather patterns as well as changing distributions, behaviors, and availability of key plants and animals over the past fifteen to twenty years (Wyllie de Echeverria and Thornton 2019). Participants noted that weather in the region was generally becoming warmer, with less snow, more rain, and more frequent and unpredictable storms (Wyllie de Echeverria and Thornton 2019). Because of these types of changes, it was suggested that deer may be generally less accessible during hunting seasons because smaller amounts of snow are allowing deer to stay higher in the hills, further away from humans. Changing weather patterns may also be influencing the incidence of disease and the quality of deer meat (Wyllie de Echeverria and Thornton 2019).

During a previous wildlife closure review (WCR22-01), Southeast Council member Douville, from POWI, supported maintaining the closure due to the condition of the deer population and habitat at the time (SERAC 2021). He explained (SERAC 2021: 612-616):

> I would be in favor of maintaining the status quo. Living here, it's absolutely correct we have a lot of stem exclusion [forest]. We have, in spite of what some may think, a high wolf population, and a lower deer population that's still trending down. I think it will continue to do so because of the wolf population and continued acreage of stem exclusion. Geography is also a real important thing here. You know, if we have a bad winter here, it's really going to be bad because we have so much stem exclusion and clearcut, along with predation.

Member Douville and other POWI residents voiced similar concerns about Unit 2 deer habitat, the declining deer population, the impact of wolves on this population, and Unit 2 residents' difficulties harvesting enough deer to meet their needs during the Southeast Council's March 2025 meeting (SERAC 2025). These local observations about the effects of forest successional changes largely match the findings of Brinkman and colleagues' (2009) study of the long-term impacts of industrial logging on deer habitat and harvest opportunities on POWI. As Brinkman and colleagues (2009: 36) explained:

> Harvest opportunities in previously logged areas [of POWI] have declined, and hunters identify second-growth forests as one of the least popular habitats for hunting. Given the current state of the logging industry in Alaska, it is unlikely that the logging of the remaining old-growth forests or the intensive management of second-growth forests will cause hunter opportunities to rebound to historic levels. Instead, hunter opportunities may continue to decline for at least another human generation, even if the long-term impacts of logging activity and deer harvest on deer numbers are minimal. Adapting hunting strategies to focus on naturally open habitats such as alpine or muskeg that are less influenced by external market forces may require considerably more hunting effort but provide the best option for sustaining deer hunting as a local tradition over the long run. We speculate that managing deer habitat in accessible areas may be more

important than managing the overall health of deer populations on a regional scale. We further suggest that the level of access to preferred hunting habitat may be just as important as deer densities in determining hunter efficiency.

Such studies and local observations point to the importance of the wildlife habitat improvement work that has begun on POWI under the partnership of ADF&G, USFS, the Mule Deer Foundation, University of Alaska Fairbanks, and the US Natural Resources Conservation Service – particularly habitat improvements that will promote increased understory vegetation in logged forests in both the short and long term (see Gregovich et al. 2024). As Mazza (2003: 16) explains, without such work, "regardless of differences in short-term interpretation of deer supply [on POWI], there is agreement that in the long term, deer populations will decline as old-growth winter habitat is lost and second-growth forests are not able to provide a substitute."

Table 1. Population change in POW communities from 1930 to 2023 (ADCCED 2025).

Community	**1930**	**1940**	**1950**	**1960**	**1970**	**1980**	**1990**	**2000**	**2010**	**2020**	**2024**
Coffman Cove	0	0	0	0	0	193	186	199	176	127	209
Craig	231	505	374	273	272	527	1260	1397	1201	1036	972
Edna Bay	0	0	41	135	112	6	86	49	42	25	44
Hollis	0	0	0	0	0	0	111	139	112	65	155
Hydaburg	319	348	353	251	214	298	384	382	376	380	354
Kasaan	112	85	47	36	30	25	54	39	49	30	85
Klawock	437	455	404	251	213	318	722	854	755	720	734
Naukati Bay	0	0	0	0	0	0	93	135	113	142	125
Point Baker	39	29	0	0	80	90	39	35	15	12	11
Port Protection	0	0	0	0	0	40	62	63	48	36	39
Shakan Bay	0	0	0	0	0	0	0	0	0	0	0
Thorne Bay	0	0	0	0	443	377	569	557	471	476	497
Whale Pass	0	0	0	0	0	90	75	58	31	86	96
Total	1,138	1,422	1,219	946	1,364	1,964	3,641	3,907	3,389	3,135	3,321

Table 2. Five-year average median household income and average poverty rates for rural communities in wildlife management units 1-5, from 2009-2023 (US Census 2025).

Unit	Average Median Household Income 2009-2013[1]	Average Poverty Rate 2009-2013	Average Median Household Income 2014-2018[2]	Average Poverty Rate 2014-2018	Average Median Household Income 2019-2023	Average Poverty Rate 20019-2023
Unit 1A	$69,201	16.9%	$68,466	13.4%	$71,226	14.3%
Unit 1C	$68,562	11.0%	$97,383	1.7%	$64,167	10.7%
Unit 1D	$77,490	5.6%	$76,689	7.5%	$60,839	9.7%
Unit 2	**$56,581**	**14.6%**	**$63,022**	**18.3%**	**$63,343**	**23.7%**
Unit 3	$66,001	16.7%	$73,736	8.4%	$63,948	11.4%
Unit 4	$78,956	12.0%	$75,986	8.3%	$59,932	8.0%
Unit 5	$95,246	5.9%	$80,138	6.7%	$80,625	7.8%

[1] Adjusted for inflation to 2023 dollars (US Bureau of Labor Statistics 2025)
[2] Adjusted for inflation to 2023 dollars (US Bureau of Labor Statistics 2025)

Table 3. Information on harvest amount and rank of deer in terms of bulk contribution to subsistence harvests in POW communities from comprehensive subsistence surveys conducted 1987 – 2012 (ADF&G CSIS 2025).

Unit	Community	Study Year	Households Attempting to Harvest Deer (%)	Households Harvesting Deer (%)	Deer Harvest per Person (lbs.)	Total Subsistence Harvest per person (lbs.)	Percent of Total Harvest that is Deer
Unit 2	Coffman Cove	1987	- [3]	57%	60	183	33%
		1998	88%	62%	55	276	20%
	Craig	1987	64%	52%	41	185	22%
		1997	59%	47%	44	231	19%
		1999	-	41%	33	-	-
	Edna Bay	1987	-	85%	110	479	23%
		1998	92%	83%	86	383	22%
	Hollis	1987	-	40%	38	183	21%
		1998	63%	39%	31	169	18%
	Hydaburg	1987	-	37%	43	336	13%
		1997	45%	33%	35	384	9%
		2012	62%	52%	68	531	13%
	Kasaan	1987	-	43%	40	182	22%
		1998	64%	57%	68	452	15%
	Klawock	1987	-	52%	45	247	18%
		1997	58%	43%	48	320	15%
	Naukati Bay	1998	66%	52%	45	242	19%
	Point Baker	1987	-	53%	89	346	26%
		1996	75%	50%	46	289	16%
	Port Protection	1987	-	36%	40	304	13%
		1996	68%	56%	94	451	21%
	Thorne Bay	1987	-	58%	37	189	20%
		1998	71%	42%	32	179	18%
	Whale Pass	1987	-	67%	50	179	28%
		1998	60%	47%	51	185	28%
		2012	76%	57%	73	247	30%
	Average		**67%**	**52%**	**54**	**286**	**19%**

[3] The dashes in this column indicate that data was not collected on whether households attempted to harvest deer in surveys conducted in 1987.

Table 4. Information on harvest, use, and sharing of deer in POW communities from comprehensive subsistence surveys conducted 1987 – 2012 (ADF&G CSIS 2025).

Unit	Community	Study Year	Households Using Deer (%)	Households Giving Deer (%)	Households Receiving Deer (%)
Unit 2	Coffman Cove	1987	73%	22%	27%
		1998	70%	24%	18%
	Craig	1987	80%	25%	42%
		1997	76%	24%	37%
		1999	76%	21%	42%
	Edna Bay	1987	95%	45%	60%
		1998	92%	8%	42%
	Hollis	1987	67%	16%	32%
		1998	56%	11%	26%
	Hydaburg	1987	76%	27%	55%
		1997	69%	27%	49%
		2012	87%	54%	54%
	Kasaan	1987	86%	21%	64%
		1998	86%	43%	29%
	Klawock	1987	74%	21%	38%
		1997	72%	25%	36%
	Naukati Bay	1998	68%	18%	26%
	Point Baker	1987	95%	37%	53%
		1996	94%	25%	56%
	Port Protection	1987	84%	16%	64%
		1996	92%	36%	64%
	Thorne Bay	1987	75%	28%	37%
		1998	54%	4%	16%
	Whale Pass	1987	78%	6%	28%
		1998	67%	27%	40%
		2012	76%	19%	19%
	Average		**78%**	**24%**	**41%**

Harvest History

Please see the analysis of WP26-03/04/05 for a comprehensive discussion of the available harvest history data for deer in Unit 2.

Alternative(s) Considered

Shift the Closure Period: One alternative considered was to shift the closure to the first two weeks of November because this may provide a greater benefit to subsistence users. Most of the harvest from FQSUs and NFQUs occurs during the month of November because deer are more susceptible to

harvest during the rut. The current August closure period appears to have been originally chosen, at least in part, because it was a popular month for hunting by Ketchikan residents at the time (OSM 2003). OSM is interested to receive feedback from the Southeast Council and public before considering further whether shifting the current closure period might be warranted.

Maintain the August Closure or the Two Buck Harvest Limit Restriction for NFQUs, but not both: It may be possible to continue providing a meaningful subsistence priority for POW residents while also increasing harvest opportunities for NFQUs by eliminating either the early season closure or the two buck harvest restriction for NFQUs.

Conduct Section 804 Prioritization Analysis: This alternative is outside the scope of this closure review. However, Wildlife Proposals WP26-04 and WP26-05 request conducting a Section 804 subsistence user prioritization among FQSUs to conserve the Unit 2 deer population and ensure the continuation of subsistence uses among a subset of FQSUs most dependent upon the resource. The analysis of these proposals will be presented to the Southeast Council, Tribal and ANCSA Corporations, the public, the State, and the Board for deliberation during the current wildlife regulatory cycle.

Discussion and Effects

The existing closure and harvest limit restriction on NFQUs in Unit 2 was implemented primarily due to the impacts of hunting pressure from Ketchikan residents. However, with the rural status change recently adopted for Ketchikan, Ketchikan residents will no longer be subject to these restrictions as FQSUs. This change will reduce the conservation benefits of the existing early season closure and harvest limit restrictions for NFQUs in Unit 2. However, given the subsistence priority mandated by ANILCA, closures or restrictions to NFQUs should be implemented before closures or restrictions to FQSUs are implemented.

Overall, it is difficult to provide a comprehensive assessment of the possible impacts of regulatory changes on the Unit 2 deer population due to limited population information and lack of quantitative biological data. Currently, hunter self-reported harvest and effort information is the only quantitative index available for tracking the Unit 2 deer population. The limitations of population data currently available warrants a conservative approach. As Brinkman and colleagues (2009: 38) explain, there are "no population data available that are accurate and precise enough to assess population trends at the temporal and spatial scales required for comparisons with changes in forest habitat and harvest opportunities. Because the island's interior was mostly uninhabited and un-hunted before commercial logging, there is no [quantitative] information on pre-logging deer populations, although descriptive accounts suggest deer were abundant." The recent decline in the Unit 2 deer harvest corresponds with a decline in the number of hunters and an aging population of local residents. However, the legacy of logging associated habitat loss, recent reductions in the number of deer harvested per year by both FQSUs and NFQUs, and the increasing time required to harvest by both user groups, suggests that the Unit 2 deer population likely has declined, the population is less accessible, and/or competition levels

are impacting harvest success and efficiency. These harvest trends are also corroborated by traditional ecological knowledge and ongoing reports of a declining Unit 2 deer population from local users.

Undoubtedly, the carrying capacity for deer on POW has declined due to habitat loss from logging. Population models indicate declines in carrying capacity of 50 to 60% by the end of the logging rotation in 2054 with declines exceeding 60% following severe winters (Hicks 1999). USFWS (2015, 2016) predicted that habitat loss from past timber harvests in Unit 2 will result in 21-33% declines in the deer population over the next 30 years, with future timber harvest exacerbating these declines. Long-term implications of this habitat loss include loss of deer hunting opportunity and the inability to provide for subsistence needs (Hicks 1999).

Per ANILCA §815(3), restrictions on the taking of wildlife for non-subsistence uses on Federal public lands may not be authorized unless necessary for the conservation of healthy populations of wildlife or to continue subsistence uses of such populations. Per §100.4, *Conservation of healthy populations of fish and wildlife* is defined *as the maintenance of fish and wildlife resources and their habitats in a condition that assures stable and continuing natural populations and species mix of plants and animals in relation to their ecosystem, including the recognition that local rural residents engaged in subsistence uses may be a natural part of that ecosystem; minimizes the likelihood of irreversible or long-term adverse effects upon such populations and species; ensures the maximum practicable diversity of options for the future; and recognizes that the policies and legal authorities of the managing agencies will determine the nature and degree of management programs affecting ecological relationships, population dynamics, and the manipulation of the components of the ecosystem.* In the current context, actions may be needed to "minimize the likelihood of irreversible or long-term adverse effects" to the Unit 2 deer population, in alignment with ANILCA §815(3) and the definition provided above. Certainly, increasing deer harvest and hunting pressure is not recommended at this time of heightened conservation concern. Many preferred hunting areas are no longer huntable, or no longer easily accessible, due to changes in the forest habitat. Habitat loss from commercial logging appears to be impacting Unit 2 deer populations and the ability of FQSUs to find enough deer to meet their subsistence needs. Local weather patterns are also changing, impacting deer habitat use patterns and associated hunting strategies (Wyllie de Echeverria and Thornton 2019).

Current Federal regulations allow for a 5 ½ -month hunting season, which may or may not be sufficient to meet local subsistence needs under current conditions. **Table 5** shows that the July/August hunting period has been one of the most important times for deer hunting in Unit 2, accounting for approximately 24% of the deer harvested by all users in recent years (Churchwell 2024, 2025). FQSUs' ability to hunt deer in January appears to be useful in times of necessity or opportunistic encounters, but it is not a preferred hunting period due to the typically poor condition of deer and the severity of January weather (**Table 5**). The January hunting period has accounted for less than 1% of the overall yearly deer harvest in Unit 2 since its inception in 2016 (**Table 5**).

In summary, while all available information (harvest indices, public testimony, TEK) indicate that the Unit 2 deer population is likely declining, and a conservative approach is warranted. Increasing deer

harvest and hunting pressure may result in jeopardizing the conservation of a healthy deer population and continuation of subsistence uses during this time of heightened conservation concern.

Table 5. Percent of harvest by month from 2004-2018 (McCoy 2019b) and 2020-2023 (Churchwell 2024). Notes: The January season has only occurred since 2016.

Time Period	July/August	September	October	November	December	January
2004-2018	19%	9%	16%	48%	5%	0.6%*
2020-2023	24%	7%	11%	55%	3%	0.1%

* Harvest in January began in 2016 and is only calculated for 2016-2018

OSM PRELIMINARY CONCLUSION

☒ **Retain the Status Quo**
☐ **Rescind the Closure**
☐ **Modify the Closure to**
☐ **Defer Decision on the Closure or Take No Action**

Justification

Deer are the most significant terrestrial source of meat for residents of the thirteen communities that compose Unit 2 (Coffman Cove, Craig, Edna Bay, Hollis, Hydaburg, Kasaan, Klawock, Naukati Bay, Point Baker, Port Protection, Shakan Bay, Thorne Bay, and Whale Pass). Likewise, deer have consistently ranked as one of the top resources harvested, utilized, and shared by Unit 2 residents since harvest surveys began in the 1980s. Reduced access to deer can represent a substantial hardship for Unit 2 households with limited means to replace wild food harvests with expensive store-bought foods. Many Unit 2 residents were already reporting that they were not meeting their subsistence needs for deer before Ketchikan's rural status change (SERAC 2017a, 2025). Recent reductions in the number of deer harvested per year by both FQSUs and NFQUs, coupled with increasing time required to harvest by both user groups, suggests that the Unit 2 deer population is in decline, the population is less accessible, and/or competition levels are impacting harvest success and efficiency. Southeast Council members have also explained that harvest report and survey statistics tend to underestimate the amount of hunting effort actually taking place, and overestimate hunting success rates because many users only report their successful hunts.

Given the subsistence priority mandated by ANILCA, closures or restrictions to NFQUs should be implemented before closures or restrictions to FQSUs may be implemented. However, Ketchikan's recent rural status change presents a unique circumstance in which to apply this consideration, as Ketchikan residents previously accounted for the majority of NFQUs hunting deer in Unit 2. The 2003 August closure (WP03-05) and 2018 harvest limit restrictions (WP18-01) implemented for NFQUs were primarily intended to limit Ketchikan residents' harvest of Unit 2 deer and thereby help conserve the Unit 2 deer population and continue subsistence uses of that population. Because the current

customary and traditional use determination for deer in Units 1-5 is written to be inclusive of all rural residents, Ketchikan residents are now able to harvest deer in Unit 2 under Federal subsistence regulations. As a result, any regulation intended to continue limiting Ketchikan residents' harvest of Unit 2 deer for the purposes of conservation and the continuation of subsistence uses, should restrict NFQUs first, before restricting a subset of FQSUs through the ANILCA §804 subsistence user prioritization process.

The long-term trend of declining deer habitat, decreasing and/or less accessible deer populations, and high hunter competition in the most road-accessible portions of Unit 2 warrants maintaining the early season closure and harvest limit restrictions for NFQUs and potentially prioritizing a subset of FQSUs most dependent on the resource for continued subsistence harvesting through a Section 804 analysis. However, a Section 804 prioritization is outside the scope of this closure review and will be taken up in the course of deliberations on Wildlife Proposals WP26-04 and WP26-05. 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 POWI will likely continue to be impacted by the legacy of logging for the next several decades.

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WRITTEN PUBLIC COMMENTS

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