



KODIAK/ALEUTIANS SUBSISTENCE  
REGIONAL ADVISORY COUNCIL  
Meeting Materials

*September 27-28, 2021  
via teleconference*



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Kodiak bear (photo by Lisa Hupp, USFWS)



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**KODIAK/ALEUTIANS SUBSISTENCE REGIONAL ADVISORY COUNCIL**

Teleconference or TBA in-person meeting  
September 27-28, 2021  
convening at 8:30 am daily

**TELECONFERENCE:** call the toll-free number: 1- 877-807-6997, then when prompted enter the passcode: 73803960#

**PUBLIC COMMENTS:** Public comments are welcome for each agenda item and for regional concerns not included on the agenda. The Council appreciates hearing your concerns and knowledge. Time limits may be set to provide opportunity for all to testify and keep the meeting on schedule.

**PLEASE NOTE:** These are estimated times and the agenda is subject to change. Contact Vince Mathews, 907-455-1823, vince\_mathews@fws.gov for the current schedule. Evening sessions are at the call of the chair.

**AGENDA**

\*Asterisk identifies action item.

**1. Invocation**

**2. Call to Order** (Chair)

**3. Roll Call and Establish Quorum** (Secretary)..... 4

**4. Welcome and Introductions** (Chair)

**5. Review and Adopt Agenda\*** (Chair)..... 1

**6. Review and Approve Previous Meeting Minutes\*** (Chair)..... 5

**7. Reports**

Council Member Reports

Chair’s Report

**8. Service Awards**

Patrick Holmes (20 years)

**9. Public and Tribal Comment on Non-Agenda Items** (available each morning)

**10. Old Business** (Chair)

- a. 805(c) Report – summary (Council Coordinator)
- b. Board FY2020 Annual Report Replies – summary (Council Coordinator)
- c. Annual Report Reply Process Discussion (Council Coordinator)
- d. Fisheries Closure Reviews (FCR21-08, -09, -11, -13, -16, -18, -19) Outreach Planning Team
- e. Update on Adak Island Caribou Herd management plan
- f. Division of Subsistence Report on Unalaska and Kodiak (ADF&G – Subsistence Division)

## 11. New Business (Chair)

### a. Wildlife Proposals\* (OSM Wildlife/Anthropology)

#### Regional Proposals

1. **WP22-37:** Ptarmigan. Unit 9D. Establish C&T\* .....64
2. **WP22-38a:** Caribou. Unit 10. Add Cold Bay and Nelson Lagoon to C&T Use Determination\* .....75
3. **WP22-38b:** Caribou. Unit 10. Modify closure\* .....83

#### Statewide Proposals

1. **WP22-01.** Various species. Statewide. Define who is/is not a participant in a community harvest program and effects on harvest limits\* .....28
2. **WP22-02.** Various species. Units 6, 9, 10, 22, 23, 26. Rescind restrictions for designated hunters in areas with community harvest systems in place\* .....46
3. **WP22-39.** Hare. Units 9 and 17. Establish season/harvest limit for Alaska hare\* .....104
4. **Statewide proposals with C&T determinations of “all rural residents” outside Kodiak-Aleutian Islands Region** (Informational item) .....114
  - a. **WP22-03.** Wolf. Unit 2. Modify sealing requirements
  - b. **WP22-12.** Deer. Unit 6D. Revise hunt areas and season dates.
  - c. **WP22-13.** Deer. Unit 6. Add deer to designated hunter list.
  - d. **WP22-25a/26a.** Sheep. Unit 7. A. Establish C&T Use Determination
  - e. **WP22-25b/26b.** Sheep. Unit 7. Establish hunt.
  - f. **WP22-33.** Black Bear. Units 11 and 12. Eliminate sealing requirement.
  - g. **WP22-40.** Wolf/Wolverine. Units 9B, 9C, 17B, and 17C. Allow use of snowmachine for positioning of animals.
  - h. **WP22-45.** Hare. Units 18, 22, and 23. Establish season/harvest limit for Alaska Hare.
  - i. **WP22-50.** Beaver. Unit 23. Trapping: Increase harvest limit to “no limit”
  - j. **WP22-53.** Arctic Fox. Unit 25. Establish season/harvest limit.
- b. 2022 Fisheries Resource Monitoring Program (OSM Fisheries/Anthropology) .....136
- c. Identify Issues for FY2021 Annual Report\* (Council Coordinator) .....159
- d. Fall 2021 Council application/nomination open season (Council Coordinator or Council Coordination Division Supervisor)

## 12. Agency Reports

(Time limit of 15 minutes unless approved in advance)

Tribal Governments

Native Organizations

USFWS

- a. Izembek National Wildlife Refuge Report
- b. Alaska Maritime National Wildlife Refuge Summer Report

OSM

**13. Future Meeting Dates\***

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Select fall 2022 meeting date and location.....174

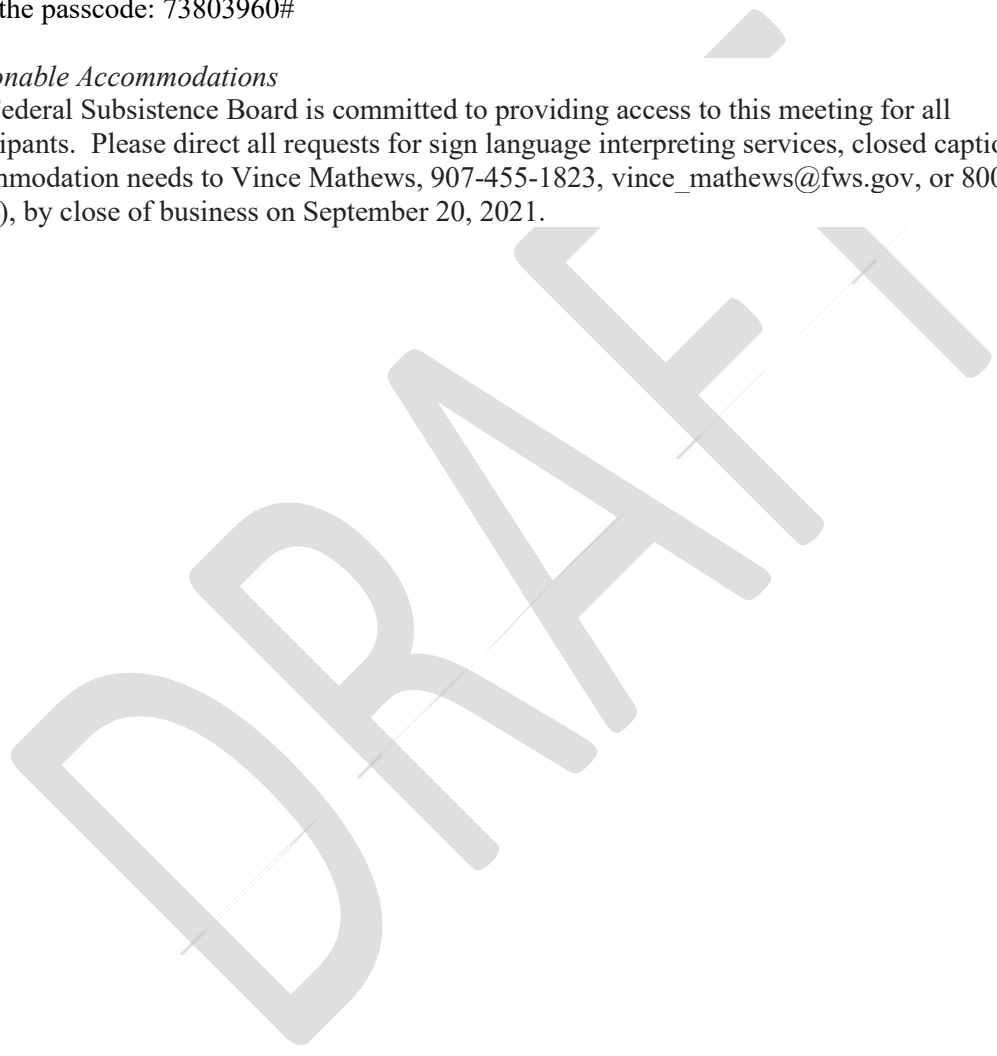
**14. Closing Comments**

**15. Adjourn (Chair)**

**To teleconference** into the meeting, call the toll-free number: 1-877-807-6997, then when prompted enter the passcode: 73803960#

*Reasonable Accommodations*

The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct all requests for sign language interpreting services, closed captioning, or other accommodation needs to Vince Mathews, 907-455-1823, vince\_mathews@fws.gov, or 800-877-8339 (TTY), by close of business on September 20, 2021.



Seat	Year Appointed <i>Term Expires</i>	Member Name & Location	Represents
1	2022	VACANT	
2	2001 <b>2022</b>	Patrick B. Holmes <i>Kodiak</i>	<b>Subsistence</b>
3	2020 <b>2022</b>	Richard R. Koso <i>Adak</i>	<b>Subsistence</b>
4	2004 <b>2022</b>	Samuel I. Rohrer <i>Kodiak</i>	<b>Comm/Sport</b>
5	2017 <b>2023</b>	Christopher L. Price <i>Unalaska</i>	<b>Subsistence</b>
6	2014 <b>2023</b>	Coral A. Chernoff <i>Kodiak</i>	<b>Subsistence</b>
7	2014 <b>2023</b>	Rebecca L. Skinner <i>Kodiak</i>	<b>Comm/Sport</b>
8	1997 <b>2021</b>	Della Trumble <i>King Cove</i>	<b>Subsistence</b>
9	2018 <b>2021</b>	Natasha M. Hayden <i>Kodiak</i>	<b>Subsistence</b>
10	2012 <b>2021</b>	Melissa M. Berns <i>Kodiak</i>	<b>Subsistence</b>

August 4, 2021



# KODIAK/ALEUTIANS SUBSISTENCE REGIONAL ADVISORY COUNCIL

## Meeting Minutes

Teleconference  
Anchorage  
March 9-10, 2021

### Invocation

Mr. Patrick Holmes gave an invocation.

### Call to Order, Roll Call and Quorum Establishment

The meeting was called to order Tuesday, March 9, 2021 at 8:30 am. Council members Patrick Holmes, Richard Koso, Sam Rohrer, Christopher Price, Rebecca Skinner, Coral Chernoff, Madam Chair Della Trumble, Natasha Hayden, and Melissa Berns were present via teleconference. The Council has one vacant seat. A quorum was established with nine of nine seated Council members participating by phone.

### Attendees:

#### *Via teleconference*

- Alaska Migratory Bird Co-Management Council: Patty Schwalenberg
- Kodiak Regional Aquaculture Association: Tina Fairbanks
- Kodiak: Duncan Fields
- Native Village of Karluk: Catherine West
- Sun'aq Tribe of Kodiak: Tom Lance and Matt Van Daele
- U.S. Fish and Wildlife Service (USFWS): Maria Fosado and Leticia Melendez (Izembek National Wildlife Refuge (NWR)), Mike Brady, Hansel Klausner, and Joy Erlenback (Kodiak NWR), Steve Delehanty (Alaska Maritime NWR), Frank Harris (Kenai Fish and Wildlife Conservation Office)
- National Park Service (NPS): Joshua Ream and Victoria Florey
- Alaska Department of Fish and Game (ADF&G): James Jackson, Lisa Fox, Tyler Polum and Kelly Krueger (Kodiak), Ross Rennick (Sand Point), Tyler Lawson (Cold Bay), Jeff Selinger (Soldotna), Robbin Dublin and Jackie Keating (Anchorage),
- Office of Subsistence Management (OSM): Donald Mike, Orville Lind, Jarred Stone, Robbin La Vine, and George Pappas

### Review and Adopt Agenda

Motion by Mr. Koso, seconded by Ms. Berns, to adopt the agenda as read with the following changes:

- Old Business, agenda Item 10:
  - Update on community and local Advisory Committee outreach efforts

- Briefing on NPS Individual Customary and Traditional (C&T) Use Determinations  
Federal Subsistence Board Action
- New Business, move Call for Wildlife Proposals under Agency Reports, last item
- Agency Reports
  - Mortensons and Russell Creek update
  - Migratory Birds Agency Reports
  - ADF&G reports

The motion passed unanimously.

### **Election of Officers**

The Council held its election of officers for a term of one year.

Della Trumble was elected Chair

Rebecca Skinner was elected Vice Chair

Melissa Berns was elected Secretary

### **Review and Approve Previous Meeting Minutes**

Motion by Ms. Berns, seconded by Mr. Holmes, to approve the winter 2020 meeting minutes with the following modifications: There was a need to acknowledge reports regarding the activities around otter stakeholders and to give all participants an opportunity.

The motion passed unanimously.

### **Council Member and Chair Reports**

*Pat Holmes* of Kodiak reported that with the minus tides, he had harvested limpet. He noted that urchins can be harvested before they spawn. He noted that herring will be much more available on the high tides this spring. He brought the Closure Review issue to the attention of the Advisory Committee and sent the information to the two Tribes in Kodiak. He talked to a couple of people in Dutch Harbor and they don't see a need to do this right now. He thought that we are on the right track.

*Richard Koso* of Adak reported that he just found out about being reappointed. He wasn't following subsistence issues as closely, not knowing if he would be reappointed. He is looking forward to contributing to the Council. He did stay in contact with the City Manager and some folks in Adak about caribou. They didn't have much of a problem locally getting their caribou this year. With COVID-19, there was less local travel, but they encouraged guiding. There are caribou issues to keep an eye on.

*Sam Rohrer* of Kodiak noted that people aren't getting out as much due to the COVID-19 pandemic. Deer numbers continue to be low on the west and north sides of the Island. He is hearing that deer numbers are down on the east side too. Deer numbers look better on the South end. He has been hearing that OSM

participated in Advisory Committee meetings concerning closure reviews, and that there was interest in this issue.

*Christopher Price* of Unalaska noted that the Council should receive an update on the paralytic shellfish poisoning project, and he is interested in hearing reports on salmon numbers from McLees and subsistence surveys.

*Rebecca Skinner* of Kodiak noted that she participated in the Alaska Marine Science Symposium, and that the panel went well. She noted that more information would be better and thinks that the symposium is still available online, if people want to watch it. The Coast Guard and National Transportation Safety Board conducted a hearing on the *Scandies Rose* sinking. She noted that a lot of information on the sinking won't come out for a while. She noted the need for boaters to have a personal locator beacon and safety equipment, and watch conditions closely. She has been seeing emperor geese in Womens Bay. Kodiak has been fairly cold and they have had a lot of snow. She has seen a lot of deer on the sides of the road.

*Natasha Hayden* of Kodiak noted that she went hunting last fall and didn't see a huge abundance of deer, but did see a healthy number of does and fawns. She noted that if the weather cooperates, we should see a rebound of the deer population. Subsistence users are excited about the upcoming season. She noted that she is looking forward to the upcoming salmon season. They have been seeing some large bear tracks on Afognak over the last week.

*Melissa Berns* of Kodiak noted that deer were sparse around Old Harbor, but that the animals looked healthy. She noted that she was at the Fort Peck Indian Reservation picking up three bison to bring back to Sitkalidak to join the herd. She noted that their Native Corporation took some action to limit the amount of deer that could be taken by non-shareholders on corporation lands. People had good access to goats this year. She noted that there were lots of waterfowl and that she did see several hundred emperor geese. People harvested clams in the winter. There was one subsistence bear taken for meat and distributed around the community last fall. They are building a processing facility at Old Harbor and this will allow people to bring in deer and bison to keep them safe from bears.

Madam Chair *Della Trumble* of King Cove noted that there were lots of storms and winds last winter. People have harvested caribou and have been out fishing for cod. She has been watching a blue heron and the eagles. She noted that there have been fresh bear tracks close to town and the bears didn't go into hibernation until November last fall. They are getting clams and subsistence resources, but COVID-19 is affecting things. She noted that the majority of King Cove residents are being vaccinated and are looking forward to being able to meet in person again. Peter Pan Seafood has been contained and hasn't let anybody on or off the premises for quite some time. She hasn't done a lot of traveling and it has been tough not being able to meet with people face to face. The King Cove Corporation does have land use permit fees to allow people to hunt off their lands and has only gotten minimal interest in the permits. The Corporation will be discussing this more. She noted that even though Cold Bay is a small community of only about 60 people, at one point they had 16 people that actually did have COVID-19. She said it was

scary to see how fast this can impact the community. People are seeing wolves. She participated in the Federal Subsistence Board (Board) meeting January 26-29 where the Board addressed fisheries proposals. She noted that they are still gathering information on Fisheries Closure Reviews and are working with the Advisory Committees and villages. Fisheries Closure Reviews will be addressed in a future Council meeting. She noted that there was a lot of concern at the Board meeting about the delay in Council appointments. She is looking forward to the time when Council meetings can be face to face again. She didn't think that many people were aware of the Fisheries Closure Review issue and thinks that this is more of a public process and education issue, so next steps can be decided.

## Old Business

- Ms. La Vine and Mr. Stone from OSM provide a briefing on the Fisheries Closure Reviews (FCR21-08, 09, 11, 13, 16, 18, and 19) that the Board deferred to give staff time to gather input from the communities impacted. Ms. La Vine noted that they have been reaching out to communities, Tribes, and State Advisory Committees. In addition to the seven deferred proposals, the remaining eight regional fisheries closures will be up for review in 2022 for a total of 15 fisheries closures to review next cycle. Ms. La Vine noted that most closures have the following in common: these are closures that the Federal Subsistence Management Program adopted from State regulations at the start of the Federal program; this is the first time that these closures are being reviewed; and all closures involve waters that are closed to subsistence fishing while they remain open to sport fishing. This Council is being asked to make a recommendation on these closures so the Board can decide how to proceed with Federal subsistence regulations. The Board can retain them, rescind them, modify them or defer them. At this point the first 7 closures were deferred by the Board at this Council's request. All 15 closures for this region would be addressed by this Council in fall 2022 and by the Board in January 2023. Outreach is occurring now and will continue for 1 ½ years. Madam Chair Trumble asked what the remaining 8 are. Ms. La Vine noted that analyses have not begun, but that they are: Unalaska Bay streams salmon; Adak Kagalaska freshwater salmon; Trout Creek salmon; Womens Bay salmon; Kodiak Area-all fish; Selif Bay Creek-salmon; Little Kitoi Creek-salmon; and Womens Bay-King Crab. OSM is working to prepare for these additional 8 Closure Reviews with the plan to begin these 8 additional reviews in 2022, but some information should be available next fall. After discussion, Madam Chair Trumble assigned Ms. Skinner, Mr. Price, and Mr. Holmes to work with her and OSM staff on the plan for review of Closure Reviews.
- Dr. Ream from NPS presented information on Individual C&Ts.
- Mr. Merizon from ADF&G gave an update on ptarmigan.
- The Council discussed their Charter. Mr. Holmes made a motion that Council members continue to serve on the Council when their term ends, until there is a replacement appointed by the Secretary's office, and that alternate members be included and identified when an existing member retires or the seat is vacant. Mr. Koso seconded the motion. The motion passed on a unanimous vote.
- Mr. Mike, Council Coordinator with OSM, presented the eight FY-2020 Annual Report items that the Council had discussed last fall. Mr. Holmes noted that for issue #2, he would suggest to acknowledge Council's appreciation for the hiring. On page 111, second to the last paragraph, the

Council might say that stock and habitat assessment should be evaluated. For the first sentence of the last paragraph, the Council is interested in participating in agency sponsored meetings and other public forums relating to knowledge concerning seas otters. Ms. Berns recommended that the Council include the new manager's name (Maria Fosado) for Izembek NWR. She also added that there was a need to update issue #7 based on Board's action and other things that happened since the draft was prepared, like the outreach plan. Mr. Mike noted that for issue #1, the work is being done on the Adak Island Caribou Management Plan and the Council will be kept updated. Mr. Holmes made a motion to approve the Annual Report with these changes, and Ms. Berns seconded the motion. The motion passed on a unanimous vote.

## **New Business**

### ***Wildlife Proposals***

Motion by Ms. Skinner to have a one bull caribou hunt for Unimak Island for all rural residents with C&T (Akutan, False Pass, King Cove, and Sand Point). The dates would remain the same and the quota would be determined based on State and Federal consultation. Mr. Rohrer seconded the motion. The motion passed unanimously. Mr. Koso made a motion to include Nelson Lagoon and Cold Bay in the C&T, so it would include all communities in the Aleutians East Borough. This motion was seconded by Ms. Skinner. This motion passed unanimously. Ms. Skinner then made a motion to open the hunt up to non-Federally qualified users, and Mr. Rohrer seconded that motion. This motion passed 8 to 1.

Final proposal submitted as follows: Cold Bay and Nelson Lagoon to the C&T and b. modify the closure to closure of Federal public lands in Unit 10, Unimak Island only, to caribou hunting, except by Federally qualified subsistence users unless the caribou population estimate exceeds a population threshold." Also request annual harvest quotas be announced by a delegated official.

### ***2022 Fisheries Resource Monitoring Program***

Mr. Jarred Stone with OSM presented the Council with the Fisheries Resource Monitoring Program (FRMP) Priority Information Needs (PINs) working group discussion results. OSM is currently seeking applications for projects that the Council developed PINs for last fall. He noted that for the FY-2022 funding cycle, that there will be about \$2.25 million available for the first year of new projects. He noted that anyone that wants to apply can find information about the program on the Federal Subsistence Management Program web page or by visiting [www.grants.gov](http://www.grants.gov). He noted that applications will be reviewed by the Technical Review Committee and the results will be presented at this fall's Council meeting.

### **Agency Reports:**

- The Council discussed concerns that were coming from Cold Bay. There were concerns about Sockeye Salmon escapements into Mortensen's Lagoon and about ptarmigan numbers. Madame

Chair Trumble is going to meet with folks in Cold Bay to better understand the concerns. Lisa Fox and Tyler Polum from ADF&G provided more information on Mortensen's Lagoon.

- Kelly Krueger (ADF&G) provided an update on the Buskin River Sockeye Salmon assessment. For 2020, thru Sept. 22, the count was 7,741 Sockeye Salmon. Mark Witteveen (ADF&G) provided information on scales and aging of the Sockeye Salmon return to the Buskin River.
- Tyler Lawson gave an update on McLees and Unalaska lakes. The 2020 Sockeye Salmon escapement to McLees Lake was 5,037. The index escapement to Unalaska Lake was 800 Sockeye Salmon. Summer Bay Lake had an indexed escapement of 4,500 Sockeye Salmon. He thanked the Qawalangin Tribe of Unalaska for all of their support.
- Lillian Naves (ADF&G) gave a report on harvest assessment for the Alaska Migratory Bird Co-management Council. She gave a brief overview of the harvest for the Kodiak and Aleutian Region. Jason Schamber (ADF&G) gave an update on the fall/winter hunt in Cold Bay.
- Dave Safine (USFWS) provided a report on the spring/summer subsistence harvest of migratory birds in Alaska.
- Maria Fosado (USFWS) gave an update on the three commercial waterfowl guides at Cold Bay. Nate Svoboda (ADF&G) followed up with addition information on guide registration and permits.
- Patty Schwalenberg provided information on spring/summer harvest of migratory birds and the Migratory Bird Treaty as amended in 1997.
- Jason Schamber (ADF&G) updated the Council on the State Board of Game meeting cycle. Ryan Scott (ADF&G) provided additional information on Alaska Board of Game meeting schedules and discussed the impact that the COVID-19 pandemic has had.
- Chandra Poe from the Qawalangin Tribe of Unalaska gave an update on PSP and sampling of mussels and butter clams.
- Matt Van Daele from the Sun'aq Tribe gave more information on shellfish.
- Steve Delahanty (USFWS) gave an update on the Alaska Maritime National Wildlife Refuge. COVID-19 prevented most of the traditional work over the past year.
- James Jackson (ADF&G) gave an update on 2020 subsistence salmon harvests in and around the City of Kodiak.
- Bill Pyle and Michael Brady (USFWS) gave an update for the Kodiak National Wildlife Refuge. They talked about brown bear, elk, caribou, mountain goat, sea otter, migratory birds and educational outreach, as well as Refuge cabins available for public use and Refuge staffing and permitting.
- Tyler Lawson (ADF&G) gave an update on Alaska Peninsula and Unalaska subsistence.
- Nate Svoboda (ADF&G) gave an update on brown bear, deer, elk, goat, caribou harvest.
- Maria Fosado (USFWS) gave an update for Izembek National Wildlife Refuge. She gave a staffing update and updates for caribou, waterfowl, brown bear, and plans for the upcoming field season.
- Dave Crowley (ADF&G) gave an update on caribou and wolves in Unit 9D and Unimak Island.
- Todd Rinaldi (ADF&G) gave an update on the Alaska Board of Game proposal and meeting schedule.

- Jackie Keating (ADF&G, Subsistence Division) presented information on several of their Fisheries Resource Monitoring Program projects in this region.
- George Pappas (OSM) gave the OSM report.

**Future Meeting Dates:**

Fall 2021 meeting to be held Sept. 27 & 28 in Cold Bay.

Winter 2022 meeting to be held Feb. 22 & 23 in Kodiak.

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Tom Kron on behalf of the retired Council Coordinator, Donald Mike, Designated Federal Officer  
USFWS Office of Subsistence Management

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Della Trumble, Chair  
Kodiak/Aleutians Subsistence Regional Advisory Council

These minutes will be formally considered by the Kodiak/Aleutians Subsistence Regional Advisory Council at its fall 2021 meeting, and any corrections or notations will be incorporated in the minutes at that meeting.

A more detailed report of this meeting, copies of the transcript, and meeting handouts are available upon request. Call Katerina Wessels at 1-800-478-1456 or 907-786-3885 or email her at [katerina\\_wessels@fws.gov](mailto:katerina_wessels@fws.gov).



FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

## Federal Subsistence Board

1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503 - 6199



FOREST SERVICE

In Reply Refer To  
OSM 21024.KW

AUGUST 04 2021

Della Trumble, Chair  
Kodiak/Aleutians Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chairwoman Trumble:

This letter responds to the Kodiak/Aleutians Subsistence Regional Advisory Council's (Council) fiscal year 2020 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to respond to these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of the issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

### **1. Adak Island Caribou Management Plan**

*The Council appreciates the response from the Board and looks forward to beginning the process of forming a management plan for Adak Island. The Council encourages the Board to initiate the management plan soon, and to include a member from the Council and a member from the community of Adak into the management plan development group.*

*In its FY-19 annual report reply, the Board said,*

*“As noted by the Council, development of a management plan may allow for more thoughtful management of the species. The Alaska Maritime NWR supports the development of a caribou management plan for Adak that reflects the wishes of various interest groups. Roughly 2/3 of Adak Island is Alaska Maritime NWR and 1/3 is Aleut Corporation land. Development of a plan should involve at a minimum ADF&G, the Aleut Corporation, the City of Adak, and the USFWS. Other interest groups may want to be involved, as well. The Alaska Maritime NWR would be more interested to support*



*opportunistic monitoring of caribou, if a well-designed caribou management plan for Adak Island is developed. The plan should include population objectives that consider the needs of Federally qualified subsistence users, non-local hunters, local community, native wildlife, and natural biodiversity, and a way to manage the herd towards that population objective.*

*The Board will contact ADF&G through OSM and encourage coordination and initiation of a planning process with the Alaska Maritime NWR, Aleut Corporation, the Council, Adak residents, and other interested parties.”*

*The Council looks forward to progress on contacting Federal and State agencies, as well as non-government agencies and other interested parties. Please keep the Council apprised of any development on the Adak caribou management plan.*

**Response:**

The Board understands the importance of developing an Adak caribou management plan and thanks the Council for its persistence on this matter. The Board reached out to the Alaska Maritime National Wildlife Refuge Manager, Steve Delehanty, and enquired on the progress of the plan. Manager Delehanty’s reply is enclosed.

The Board also wants to note that last year was quite unusual due to COVID-19, therefore progress on this issue was delayed. The Board hopes that as Alaska returns to pre-COVID conditions, more progress can be made on the development of the Adak caribou management plan.

**2. Izembek National Wildlife Refuge**

*The Council appreciates the hiring of Izembek NWR manager, Ms. Maria Fosado. The manager and staff provide critical resource information to the Council. The reports presented by the Refuge provide the Council with information needed to develop subsistence and resource recommendations.*

**Response:**

We are grateful to hear positive feedback regarding recent staff additions. The U.S. Fish and Wildlife Service (FWS) recognizes the importance of having adequate staffing at all refuges throughout Alaska and supports the continued staffing at remote refuges such as Izembek.

Within the last year, the Alaska Region prioritized the hiring of three permanent full-time positions at Izembek Refuge. Since June of 2020, FWS has hired Refuge Manager Maria Fosado, Administrative Support Assistant Patrick Magrath Jr., and Wildlife Biologist Alison Williams. Izembek Refuge currently has five permanent full-time staff located in Cold Bay.

The FWS believes information sharing is essential and critically important for the Council's ability to address subsistence issues while ensuring the conservation and protection of subsistence resources. We understand keeping the Council apprised of survey efforts, status and trends of subsistence resources, species concerns, and of management actions is vital to the Council as it strives to make informed decisions and recommendations regarding the management of subsistence resources.

The Refuge and the FWS as a whole value engaging with the Council. The Council plays a critically important role in bringing together rural subsistence users and resource management agencies, such as the FWS, with the goal of information sharing and facilitating thoughtful discussions pertaining to the management of subsistence resources. Collaboration with the Council fosters relationships, builds trust, and provides transparency on current and ongoing subsistence issues. Further, it provides a better understanding of the potential implications a management action, or lack of action, may have on the resource and/or the subsistence user.

### **3. Regional Advisory Council Alternate Member**

*The Council currently has two vacant seats. The Council depends on members who have knowledge of their region and communities to develop recommendations to the Board on subsistence resource related issues in public meetings. It is important for the Council to have all the seats filled in order to represent the cultural and geographic diversity of the region. Not reappointing the Council incumbents who have served on the Council for several terms and that have reapplied to serve again, has handicapped the effectiveness of the Council in developing informed decisions.*

*The Council recommends that when the nominations package is submitted to the Secretaries of Interior and Agriculture that the Board will recommend that the Secretaries appoint alternates from a pool of qualified applicants identified by the interagency panel. Designation of alternate members to each of the ten Councils is needed to ensure seats remain filled and communities in the region have adequate representation at Council meetings.*

*In its FY-19 reply, the Board said,*

*“As a result, prior to the charter language change, the seat would have remained vacant throughout an entire year, leaving subsistence regions underrepresented. With the new provision in place, the Board suggests that whenever possible the Council nominations panels identify qualified alternates from the pool of applicants and present names to the Board. After review, the Board might recommend that the Secretaries appoint them as alternate member(s).*

*After the Secretaries appoint an alternate member(s), this member remains “in reserve” and will engage in the Council’s business only if a seat becomes permanently vacant for the reasons stated above. An alternate member cannot replace a sitting Council member during a meeting if that Council member is sick or otherwise unavailable to attend the meeting. Under the new provision, alternate members do not become available until around December 2020, as noted by the Council.”*

**Response:**

The Board understands the Council’s concern regarding current vacant seats. It is important to have a diverse and wide representation of user groups throughout the region and have all of the Council’s seats filled. In the 2019 appointment year, the Council had four seats that were open for appointment, but the Board received only three applications. In the 2020 appointment year, the Council had five seats that were open for appointment, but the Board received only four applications. As a result of insufficient applications in 2019 and 2020, the Board could not provide recommendations to the Secretaries of Interior and Agriculture to fill all of the vacant seats on the Council, and there were no applicants to recommend for alternate positions.

In Fiscal Year 2020, the Office of Subsistence Management (OSM) conducted outreach in the Kodiak/Aleutian Region and throughout the State during the application period that was open from September 3, 2019 to March 2, 2020. Applications were mailed and emailed to individuals, agencies, and organizations. Extensive outreach was conducted through a variety of media outlets, including, but not limited to newspaper, radio, internet, Facebook, and public conferences. These efforts resulted in 74 applications to fill 62 vacated or expiring seats on all Councils, but unfortunately, not enough for the Kodiak/Aleutians Region.

The Board encourages the Council members to assist OSM with outreach effort in its communities and throughout the Region to attract a wider pool of applicants for future appointment cycles. Having a wider pool of applicants allows the Board to choose the most qualified individuals for appointment recommendations and to ensure that most or all seats are filled and alternates are selected when possible. However, it is important to remind the Council that the Board does not have final authority over which recommended applicants are appointed to

the Councils. After the Board submits its annual appointment recommendations, the final appointment authority rests with the Secretary of the Interior.

#### **4. Sea Otter – Endangered Species Act designation**

*In prior Council public meetings, the Council has questioned the designation of the northern sea otter population in the Kodiak Archipelago as part of the Southwest Alaska Stock. The Southwest stock is currently considered a population that is threatened.*

*Sea otter numbers have declined in southwestern Alaska over the past 20 years. Once containing more than half of the world's sea otters, this population segment, which ranges from Kodiak Island through the western Aleutian Islands, has undergone an overall population decline of at least 55–67 percent since the mid-1980s. In 2005, the U.S. Fish and Wildlife Service (Service) listed this distinct population segment as Threatened under the Endangered Species Act. (<https://www.fws.gov/alaska/pages/marine-mammals/sea-otters>)*

*In 2005 the Service listed sea otters in southwest Alaska as threatened under the Endangered Species Act (ESA). As a result of this ESA listing, the Service has developed a recovery plan to identify the cause of the decline, monitor population trends, and help recover the sea otter population in southwest Alaska.*

*In 2009 the Service finalized the designation of critical habitat for the threatened northern sea otter in southwest Alaska. Critical habitat areas contain habitat that is essential to the conservation and recovery of a threatened or endangered species. ([https://www.fws.gov/r7/fisheries/mmm/seaotters/pdf/factsheet\\_wildlife\\_biologue.pdf](https://www.fws.gov/r7/fisheries/mmm/seaotters/pdf/factsheet_wildlife_biologue.pdf))*

*The Council has the following questions regarding sea otters. How does the Service determine stock identification (SW, PWS, and SE stocks), and the criteria/process for determining population stock designation? What criteria and administrative, genetic, and population size trends were used to designate the Kodiak Island sea otter population a part of the SW population?*

*Council discussions, and dialogue, with rural residents within the Kodiak Archipelago by Council members, reported that the sea otter population in the area are healthy. Rural residents have concerns on how the sea otters have impacted subsistence shellfish resources caused by the increasing sea otter population.*

*Additionally the council asked, can the population within the Kodiak Archipelago be reclassified as a separate stock? Stock assessment and habitat assessment within the Kodiak Archipelago should be evaluated to determine if the population is healthy.*

*The Council is interested in participating in agency sponsored meetings, and other public forums, relating to its knowledge of sea otters within the Kodiak area. The Council is willing to send a delegate to participate in future meetings and to sponsor a member from the Council to attend and participate when funding is available.*

**Response:**

Thank you for your detailed questions regarding the northern sea otter population in the Kodiak Archipelago and its designation as a part of the Southwest Alaska Stock. The Federal Subsistence Management Program does not manage marine mammals and sea otter is outside of the Board's jurisdiction. The Board has asked the FWS Marine Mammals Management program to provide the answers. Their full reply is enclosed.

**5. Fisheries Resource Monitoring Program**

*The Council would like to express its appreciation for Ms. Robbin La Vine and Mr. Jarred Stone for their assistance at our recent meeting to develop Priority Information Needs (PINs) Working Group volunteer meeting on August 31, 2020.*

*The Council is impressed with the information the staff assembled and their professional facilitation for our "informal" teleconference to review the "2022 Draft Priority Information Needs for the Southwest region" (Bristol Bay Regional Advisory Council and Kodiak Aleutian Regional Advisory Council).*

*This was a great assistance in developing our research priorities list and Mr. Keith Ivy, the young intern, who assembled the "backlog information" materials, did a great job as well.*

*The Council indicated this Fisheries Resource Monitoring Program cycle was an exhausting endeavor and was probably without a doubt, the best prepared and conducted working group planning meeting and review session in which we have participated, in the experience of our Council.*

Chairwoman Trumble

**Response:**

The Board is gratified to hear your Council benefited from the support and expertise of OSM staff, Ms. Robbin La Vine and Mr. Jarred Stone, during the development of the 2022 Fisheries Resource Monitoring Program's Priority Information Needs for your region. A letter of appreciation from this Council was shared with the Regional Directorate. The Board is also grateful for your recognition of the Directorate Fellowship Program intern, Keith Ivy, originally from Bethel. Mr. Ivy has also interned with the NPS's Regional Cultural Resources Program and is a graduate of the Alaska Native Science and Engineering Program. You might be interested to learn that Mr. Ivy was accepted into the Masters of Science in Fisheries Program at University of Alaska Fairbanks for the Fall of 2021 and was recently hired as a permanent fisheries biologist within the USFWS. Mr. Ivy's position with the Service and graduate work will have a special focus on indigenizing salmon management through the process of creating safe spaces for dialogue of historical or current inequities in science or management systems so that Indigenous peoples, values, practices and knowledge are better understood and included in science and management systems.

**6. Food Security**

*With the recent COVID-19 pandemic and food production plants shutting down throughout the country, it is important to emphasize the importance of subsistence resources in Alaska. It is uncertain how long the pandemic will continue, along with delays of goods and services caused by the pandemic and its associated affects across Alaska. Food security for subsistence users is important. The Board can continue to support subsistence opportunities by providing subsistence resource access through season extensions and special actions to address food security.*

**Response:**

In 2020, the Interagency Staff Committee began developing a draft white paper on Food Security as a Threat to Public Safety and a draft Framework to Evaluate Special Action Requests Related to Public Safety/Food Security. Once these drafts are finalized, they will be presented to the Board for further discussion and direction. If the framework is approved by the Board, it could serve as a mechanism available to allow access to subsistence food resources during emergencies in the future.

COVID-19 did indeed highlight food security issues. The Federal Subsistence Management Program can support adaptation to changing conditions by ensuring that regulations facilitate flexibility, rather than hindering it. A responsive regulatory process can also ensure that people continue to access healthy local and traditional foods during times of unexpected shortage. The Special Action process provides an avenue for responding to these changes, and the Board has been responsive to the need for quick action on out of cycle requests.

In addition, flexibility can be built into the system by delegating authority to local land managers. Delegation of authority enables managers to respond more quickly to unpredictable seasons and will likely need to be used with increasing frequency given that climate change may cause the timing of certain subsistence resources to fluctuate widely from year to year.

More persistent changes to the availability and seasonality of resources due to climate change can be accommodated through the regulatory process. When species become less abundant due to climate change, closures to non-Federally qualified users, or ANILCA Section 804 prioritizations among Federally qualified subsistence users, may become necessary. Other species may become more abundant with shifts in environmental conditions, or new species may expand into the region. In this case, the Federal Subsistence Management Program can assist communities in delineating seasons, harvest limits, and methods and means for these newly available resources.

## **7. Closure Reviews**

*The Board's policy on closure reviews is to provide transparency to the public regarding the process for addressing Federal closures and provide for periodic review of regulatory closures, and subject to change during the regulatory year.*

*The Council had seven closure reviews to consider at its fall 2020 meeting and develop its recommendations to the Board. It is important to the Council, that the public has an opportunity to review these closures and the Council seeks their comments regarding affected subsistence activities. The Council deferred all seven closure reviews until its winter 2021 public meeting. The Council requested that the Office of Subsistent Management (OSM) staff present the closure reviews to local State advisory committees and Tribal entities to gather additional public comments in the fall of 2020. The Council will develop its final recommendations to the Board after hearing all public comments on the closures. The Board convened in January 2021 to act on the April 2021 – March 2023 fishery proposals and closure reviews. The Board deferred the Federal fishery closure reviews to the 2023 fishery cycle, in deference to the Council.*

*At its winter 2021 March meeting, the Council approved a planning team to develop outreach strategies to inform the public, affected by the Federal fishery closure reviews, to inform the public of these closures within the Kodiak/Aleutians region and take testimony and comments. The planning team is composed of three Council members and OSM staff.*

**Response:**

The Board acknowledges this is the first time your region has had the opportunity to review area closures under our new Closure Policy. Your region is unique across the state as most of your fisheries closures were incorporated into Federal regulations from State regulations approximately 20 years ago, and this is the first time any have been reviewed. As you know, the Federal Subsistence Management Program is a public process made better by local involvement and expertise. The Board recognizes that advanced notice during the fall meeting cycle prior to the fisheries regulatory cycle can aid in Council outreach. We are grateful for your forethought and planning on this issue and direct OSM staff to support your efforts to inform the public and gather local input. We expect the program can learn from your action and guidance, improving the closure review process for all Councils.

**8. Invasive Species**

*The Council recognizes the presence of invasive species in the region and within the State. Invasive species have the potential to invade anadromous streams and lake systems in Alaska affecting the native flora and fauna and disrupting the natural environment. The Sun'aq Tribe of Kodiak reported they have begun investigations of introduced crayfish in the Buskin Lake drainage. The Buskin River currently has crayfish that may compete for habitat used by juvenile salmon, as an example, and potentially feed on salmon eggs or fry.*

*The Council encourages Federal and State agencies to monitor invasive species in the State. Invasive species affecting the natural environment will also affect subsistence resources, specifically for all salmon. Invasive species should be mitigated to protect the natural resources. Mitigation of invasive species is key to protecting subsistence resources.*

**Response:**

The Board thanks the Council for bringing this concern to its attention. Alaska is undergoing large-scale changes that are accelerating, including the introduction and expansion of invasive species. However, Alaska is also in a unique position to prevent new introductions and spread of existing invasive species by adopting policies and actions aimed at bolstering prevention, early detection efforts and rapid response efforts.

The Alaska Invasive Species Partnership is a statewide collaborative made of Federal, State, and Tribal resources managers, researchers, industry representatives, and community members. This partnership is working on a variety of invasive species work such as:

- Enhancing communication and education opportunities about invasive species;



- Assessing the habitat suitability and pathways for invasive species within and into Alaska;
- Prioritizing species and locations for prevention and early detection work;
- Studying the basic life history of species of concern to make better informed management decisions; and
- Standardizing field techniques and expanding early detection and rapid response efforts in priority areas.

One priority area for the FWS, a Federal member of the Alaska Invasive Species Partnership, is the Kodiak Archipelago. Over the past five years, the FWS has been working closely with the Sun'aq Tribe of Kodiak, Kodiak Soil and Water Conservation District, and the Alaska Department of Fish and Game to assess the distribution, movements and potential impacts of Signal Crayfish, which were introduced to the Buskin River Watershed.

There are no native crayfish in Alaska and Signal Crayfish are known to feed on fish eggs and juvenile fish as well as increase the amount of suspended sediment in streams and lakes through their burrowing behavior. Increased sediment in the water of the Buskin Lake and stream systems could impact the food webs that the salmon and char rely on.

The FWS, along with the Bureau of Indian Affairs, has provided funding and technical support to:

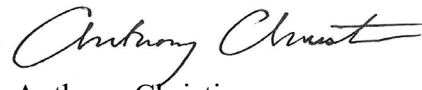
- Assess what the Signal Crayfish are feeding on (e.g., stomach samples and stable isotope analysis);
- Map the distribution of Signal Crayfish populations in reference to salmon spawning locations;
- Track the movement of Signal Crayfish within the watershed and conduct surveys for them along the Kodiak road system; and
- Evaluate and implement control measures to keep the invasive population at a low level until a management technique is identified to eradicate the population.

The FWS and partners also hope to expand early detection tools in the near future to include environmental DNA surveys. This tool has shown to be very useful in Alaska for detecting invasive Northern Pike populations in Southcentral Alaska.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts and am confident that Federally qualified subsistence users of the Kodiak Aleutian Region are well represented through your work.

Chairwoman Trumble

Sincerely,



Anthony Christianson  
Chair

Enclosures

cc: Kodiak Aleutian Subsistence Regional Advisory Council  
Federal Subsistence Board  
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management  
Amee Howard, Deputy Assistant Regional Director, Office of Subsistence Management  
Robbin La Vine, Subsistence Policy Coordinator, Office of Subsistence Management  
Katerina Wessels, Council Coordination Division Supervisor  
Office of Subsistence Management  
Lisa Grediagin, Wildlife Division Supervisor, Office of Subsistence Management  
George Pappas, State Subsistence Liaison and Acting Fisheries Division Supervisor  
Office of Subsistence Management  
Jonathan Vickers, Anthropology Division Supervisor, Office of Subsistence Management  
Donald Mike, Council Coordinator, Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Project Coordinator, Alaska Department of Fish and Game  
Administrative Record



# United States Department of the Interior

FISH AND WILDLIFE SERVICE



Alaska Maritime National Wildlife Refuge  
95 Sterling Highway, Suite 1  
Homer, Alaska 99603

May 17, 2021

Kodiak/Aleutians Regional Advisory Council

Dear Council:

Thank you for your inquiry regarding the development of a management plan for caribou on Adak Island. I share your interest in developing a plan but must report that I have made no substantive progress.

In my view, any such plan must involve the Alaska Department of Fish and Game in a key leadership role. I have discussed the concept with the ADF&G area manager for the Aleutians, Dave Crowley. Between hectic work schedules and living hundreds of miles apart, we haven't made any progress beyond broaching the subject. I do not know if the Department views development of a management plan for Adak caribou as a priority, but without their active involvement, I don't see a path forward. I will contact Mr. Crowley again and learn whether the Department is able to invest in this effort. As you know, ADF&G has faced serious staff and budget challenges for several years, so it is possible that ADF&G simply doesn't have the capacity to tackle this issue now.

While it is a poor excuse for the lack of progress, I also want to point out to the Council that the Alaska Maritime National Wildlife Refuge staff has been reduced by 28% in recent years. It is increasingly difficult to maintain existing activities and even more difficult to begin new actions. That said, I remain committed to participating in a caribou management planning effort if we can successfully involve the key players. That likely includes Adak, The Aleut Corporation, the Alaska Department of Fish and Game, and the Alaska Maritime National Wildlife Refuge as a minimum. The Aleut Corporation and the federal government are the major landowners. ADF&G has a primary wildlife management responsibility, and the City of Adak has interested residents and economic interests involved. If the Regional Advisory Council is not adequately represented through the community, I would be happy for the RAC to participate in some other way.

Sincerely,

**STEVEN  
DELEHANTY**

Digitally signed by STEVEN  
DELEHANTY  
Date: 2021.05.17 09:42:22 -0800

Steve Delehanty, Refuge Manager

cc: Dave Crowley, ADF&G

**Answers to the Council's questions re Endangered Species Act designation of sea otter provided by the USFWS Marine Mammals Management Program**

Question: Why is the northern Sea Otter population in the Kodiak Archipelago designated as part of the Southwest Alaska Stock?

Answer: The Northern sea otter population in the Kodiak Archipelago was designated as part of the Southwest Alaska Stock based on genotypic, phenotypic, and geographic distribution evidence. The FWS gave considerable weight to the work of Gorbics and Bodkin (2001), who followed the phylogeographic approach of Dizon et al. (1992) to identify stock structure when the FWS determined the three stocks of sea otters in Alaska. This approach provides a more robust assessment of separation than any single technique alone. Based on these findings the Kodiak Archipelago was included as part of the Southwest sea otter stock. This population is discrete due to its separation from other northern sea otter populations due to geographical barriers combined with the relatively narrow band of sea otter habitat. The physical feature separating sea otters between the Kenai Peninsula and the Kodiak Archipelago is approximately 70 kilometers (approx. 43.5 miles) of open water with maximum water depth approximately 200 meters (approx. 656 feet) (with the Barren Islands half-way between). There are also morphological and genetic differences from the remainder of the taxon that are evidence of this separation.

Question: What criteria and administrative, genetic, and population size trends were used to designate the Kodiak Island sea otter population a part of the Southwest population?

Answer: The identification of three stocks of sea otters in Alaska was based on the best available scientific information that had been published in peer-reviewed scientific journals. Prior to determining these three stocks the FWS sought input from the Alaska Regional Scientific Review Group, a group of marine mammal experts that provides advice to the Service and is established under the Marine Mammal Protection Act. The FWS also sought input on this designation from the public when it proposed the designation in 1998 by way of a Federal Register notice published in March 1998 (63 FR 10936). After additional genetic analysis addressing the issue of stock identification was completed, in March 2002, the FWS once again proposed the identification of three stocks of sea otters in Alaska (67 FR 14959) and finalized the stock assessment reports in August 2002 (67 FR 62979).

Rather than rely on genetic information alone to determine if sea otters in Southwest Alaska are markedly separated from the other two stocks of sea otters in Alaska, and as noted above, the FWS gave considerable weight to the work of Gorbics and Bodkin (2001). This work followed a phylogeographic approach to identify stock structure. The FWS believes that this broad-based approach, which considers multiple lines of evidence including distribution, population response, morphology, and genetics, provides a more robust assessment of separation than any single technique alone.

The evidence for separate stock identity is genotypic (all stocks), phenotypic (Southcentral and Southwest stocks), and geographic distribution (Southeast stock), whereas population response data are more ambiguous between all stocks. Differences in genotype frequencies and the presence of unique genotypes among areas indicate restricted gene flow. This indicated that genetic exchange may be limited by little or no movement across stock boundaries and discontinuities in distribution at stock boundaries. Skull size differences (phenotypic) between Southwest and Southcentral Alaska populations further support stock separation.

Physical features of the habitat of the sea otter contribute to isolation of populations from each other. The sea otter uses a relatively narrow band of coastal habitat generally bounded by the shoreline and waters to 100 m in depth (Kenyon 1969). The physical feature constraining movement of sea otters between the Kenai Peninsula and the Alaska Peninsula is approximately 100 kilometers (approx. 62 miles) of open

water across Cook Inlet with maximum water depth approximately 100 meters (approx. 328 feet). The physical feature separating sea otters between the Kenai Peninsula and the Kodiak Archipelago is approximately 70 kilometers (approx. 43.5 miles) of open water with maximum water depth approximately 200 meters (approx. 656 feet) (with the Barren Islands half-way between).

On the basis of that review, the following boundaries were identified: (1) a Southeast stock extending from Dixon Entrance to Cape Yakataga; (2) a Southcentral stock extending from Cape Yakataga to Cape Douglas including Prince William Sound and Kenai peninsula coast; and (3) a Southwest stock including Alaska Peninsula coast, the southward and westward along the Aleutians to Attu Island including Barren Islands, Kodiak Archipelago, Pribilof Islands, and Bristol Bay.

Question: Can the population within the Kodiak Archipelago be reclassified as a separate stock?

Answer: The FWS completed a 5-year Review and a Species Status Assessment in January 2021 on the Northern Sea Otter Southwest Alaska Stock and assessed that the available information does not support this action. The Kodiak Archipelago is identified as part of a larger entity (Southwest stock), which is also classified as threatened distinct population segment (DPS) under the Endangered Species Act. Designating a DPS of a DPS, which we would request here, would need information that demonstrates that it is discreet and significant, as defined under the 1996 DPS policy, from the rest of the current DPS, and would also need to demonstrate that the DPS is not threatened or endangered.

Question: How does the Service determine stock identification (SW, PWS, and SE stocks), and the criteria/process for determining population stock designation?

Answer: A stock is defined by the Marine Mammal Protection Act, as a group of marine mammals of the same species or smaller taxa in a common spatial arrangement that interbreed when mature. As noted above, the work of Gorbics and Bodkin (2001), was used to identify stock structure.

The Southwest stock is also classified as a distinct population segment (DPS) per the Endangered Species Act (ESA). A DPS is defined as a vertebrate population or group of populations that is discrete from other populations of the species and significant in relation to the entire species.

Criteria for judging the significance of a DPS includes, but is not limited to, the four examples listed in our DPS policy (see Distinct Vertebrate Population Segment (61 FR 4722)), which addresses the recognition of DPSs for potential listing actions. The policy allows for more refined application of the Act that better reflects the biological needs of the taxon being considered, and avoids the inclusion of entities that do not require its protective measures. Under our DPS policy, three elements are considered in a decision regarding the status of a possible DPS as endangered or threatened under the Act. They are: (1) discreteness of the population segment in relation to the remainder of the taxon; (2) the significance of the population segment to the taxon to which it belongs; and (3) the population segment's conservation status in relation to the Act's standards for listing (i.e., is the population segment, when treated as if it were a species, endangered or threatened?).

Based on these criteria, the Southwest stocks meets the classification of a distinct population segment. The population's discreteness is due to its separation from other Alaskan sea otter stocks as a consequence of physical factors, and there are also morphological and genetic differences that are evidence of this separation. The population segment's significance is due principally to the significant gap that its loss would represent in the range of the Alaskan sea otters. In addition, this population segment represents a considerable portion of the overall genetic variability of the species.

Question: Are there any upcoming meetings that the Council can send a delegate to attend related to the topic of sea otters within the Kodiak area?

Answer: To the best extent known, there are currently no meetings focusing on sea otters in the Kodiak area happening in the near future; however, if there is an interest, Marine Mammals Management can arrange to have a meeting with the Council and any other pertinent party to discuss Southwest sea otter topics and issues. There is a Southeast Sea Otter Stakeholder Working Group that was recently developed (2021). This group meets quarterly to discuss on-going Southeast sea otter topics and relevant issues. If you would like more information on this group or when they meet next, please contact Jenipher Cate, the Sea Otter and Walrus Program Lead, at [jenipher\\_cate@fws.gov](mailto:jenipher_cate@fws.gov).

**Literature cited:**

Gorbics, C.S., and J.L. Bodkin. 2001. Stock structure of sea otters (*Enhydra Lutris Kenyoni*) in Alaska. *Marine Mammal Science* 17(3):632-647.

Dizon, A. E., C. Lockyer, W. F. Perrin, D. P. Demaster and J. Sisson. 1992. Rethinking the stock concept: A phylogeographic approach. *Conservation Biology* 6:24-36.

Kenyon, K. W. 1969. The sea otter in the eastern Pacific Ocean. *North American Fauna Number 68*: 1-352. Bureau of Sport Fisheries and Wildlife, Washington, DC.

## **Presentation Procedure for Proposals and Closure Reviews**

### **1. Introduction and Presentation of Draft Staff Analysis**

### **2. Report on Board Consultations:**

- a. Tribes
- b. ANCSA Corporations

### **3. Agency Comments:**

- a. ADF&G
- b. Federal
- c. Tribal

### **4. Advisory Group Comments:**

- a. Other Regional Advisory Council(s)
- b. Fish and Game Advisory Committees
- c. Subsistence Resource Commissions

### **5. Summary of Written Public Comments**

### **6. Public Testimony**

### **7. Regional Council Recommendation (motion to adopt)**

### **8. Discussion/Justification**

- Is the recommendation consistent with established fish or wildlife management principles?
- Is the recommendation supported by substantial evidence such as biological and traditional ecological knowledge?
- Will the recommendation be beneficial or detrimental to subsistence needs and uses?
- If a closure is involved, is closure necessary for conservation of healthy fish or wildlife populations, or is closure necessary to ensure continued subsistence uses?
- Discuss what other relevant factors are mentioned in OSM Draft Staff Analysis

### **9. Restate final motion for the record**

### **10. Council's Vote**

<b>WP22-01 Executive Summary</b>	
<b>General Description</b>	<p>Proposal WP22-01 requests clarification of who is and who is not a participant in a community harvest system and how that affects community and individual harvest limits. <i>Submitted by: the Office of Subsistence Management</i></p>
<b>Proposed Regulation</b>	<p><b>§ _____.25 Subsistence taking of fish, wildlife, and shellfish: general regulations</b></p> <p><i>(c) Harvest limits</i></p> <p>...</p> <p><b>(5) Fish, wildlife, or shellfish taken by a participant in a community harvest system counts toward the community harvest limit or quota for that species as well as individual harvest limits, Federal or State, for each participant in that community harvest system, however, the take does not count toward individual harvest limits, Federal or State, of any non-participant. Fish, wildlife, or shellfish taken by someone who is not a participant in a community harvest system does not count toward any community harvest limit or quota.</b></p> <p><b>(i) For the purposes of this provision, all residents of the community are deemed participants in the community harvest unless the Board-approved framework requires registration as a prerequisite to harvesting or receiving any fish, wildlife, or shellfish pursuant to that community harvest, in which case only those who register are deemed participants in that community harvest.</b></p> <p><b>§ _____.26 Subsistence taking of wildlife</b></p> <p><i>(e) Possession and transportation of wildlife.</i></p> <p>...</p> <p><del><i>(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest limit for that species. Except for wildlife taken pursuant to § _____.10(d)(5)(iii) or as otherwise provided for by this part, an animal taken as part of a community harvest limit counts toward every community member's</i></del></p>



<b>WP22-01 Executive Summary</b>	
	<i>harvest limit for that species taken under Federal or State of Alaska regulations.</i>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Bristol Bay Subsistence Regional Advisory Council Recommendation</b>	
<b>Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation</b>	
<b>Western Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	
<b>Northwest Arctic Subsistence Regional Advisory Council Recommendation</b>	

<b>WP22-01 Executive Summary</b>	
<b>Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>North Slope Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

## DRAFT STAFF ANALYSIS WP22-01

### ISSUES

Wildlife Proposal WP22-01, submitted by the Office of Subsistence Management (OSM), requests clarification of who is and who is not a participant in a community harvest system and how that affects community and individual harvest limits.

### Discussion

The proponent requests specific language clarifying who is and who is not a participant in a community harvest system and how this relates to individual and community harvest limits. While developing the framework for a community harvest system in summer 2020, Ahtna Intertribal Resource Commission (AITRC) representatives and Federal agency staff realized that current Federal regulations stipulate that any animals harvested under a community harvest limit count toward the harvest limits of every community member whether or not they choose to participate in the community harvest system. This provision is perceived as unfair to community members who are not interested in participating in a community harvest system because their individual harvest limits are met involuntarily by participants in the community harvest system.

This proposal would affect community and individual harvest limits as well as define who is and who is not a participant in a community harvest system for wildlife, fish, and shellfish, statewide. In addition to clarifying who is and who is not a participant in a community harvest system, the intent of this proposal is to allow community members who opt out of a community harvest system to retain their individual harvest limits.

Note: While the proposal as submitted listed the proposed regulations under §100.25(c)(2), the proponent clarified their intention was to create a separate section for these regulations as §100.25(c)(5).

### Existing Federal Regulation

#### **36 CFR 242.25 and 50 CFR 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations**

*(c) Harvest limits*

#### **§\_\_\_\_.26 Subsistence taking of wildlife**

*(e) Possession and transportation of wildlife.*

...

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts towards the community harvest*

*limit for that species. Except for wildlife taken pursuant to § \_\_\_\_ .10(d)(5)(iii)<sup>1</sup> or as otherwise provided for by this part, an animal taken as part of a community harvest limit every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*

### **Proposed Federal Regulation**

#### **§ \_\_\_\_ .25 Subsistence taking of fish, wildlife, and shellfish: general regulations**

*(c) Harvest limits*

...

*(5) Fish, wildlife, or shellfish taken by a participant in a community harvest system counts toward the community harvest limit or quota for that species as well as individual harvest limits, Federal or State, for each participant in that community harvest system, however, the take does not count toward individual harvest limits, Federal or State, of any non-participant. Fish, wildlife, or shellfish taken by someone who is not a participant in a community harvest system does not count toward any community harvest limit or quota.*

*(i) For the purposes of this provision, all residents of the community are deemed participants in the community harvest unless the Board-approved framework requires registration as a prerequisite to harvesting or receiving any fish, wildlife, or shellfish pursuant to that community harvest, in which case only those who register are deemed participants in that community harvest.*

#### **§ \_\_\_\_ .26 Subsistence taking of wildlife**

*(e) Possession and transportation of wildlife.*

...

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest limit for that species. Except for wildlife taken pursuant to § \_\_\_\_ .10(d)(5)(iii) or as otherwise provided for by this part, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*

### **State of Alaska Regulations**

State general regulations describing its community harvest program are in **Appendix 1**.

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<sup>1</sup> § \_\_\_\_ .10(d)(5)(iii) *The fish and wildlife is taken by individuals or community representatives permitted a one-time or annual harvest for special purposes including ceremonies and potlatches;*

## Federal Public Lands

Federal public lands comprise approximately 54% of Alaska statewide and consist of 36% U.S. Fish and Wildlife Service managed lands, 28% Bureau of Land Management managed lands, 25% National Park Service managed lands, and 11% U.S. Forest Service managed lands.

## Customary and Traditional Use Determination

This is a statewide proposal for wildlife, fish, and shellfish.

## Regulatory History

In 1991, after extensive public comment on the Federal Subsistence Management Program's first Temporary Rule, the Federal Subsistence Board (Board) committed to addressing community harvest limits and alternative permitting processes (56 Fed. Reg. 123, 29311 [June 26, 1991]).

In 1992, responding to approximately 40 proposals requesting community harvest systems and numerous public comments requesting alternative permitting systems, the Board supported the concept of adjusting seasons and harvest limits based on customs and traditions of a community (57 Fed. Reg. 103, 22531–2 [May 28, 1992]). The Board said specific conditions for the use of a particular harvest reporting system may be applied on a case-by-case basis and further development and refinement of guidelines for alternative permitting systems would occur as the Federal Subsistence Management Program evolved (57 Fed. Reg. 104, 22948 [May 29, 1992]). These regulations at \_\_\_\_\_.6 were modified to state that intent more clearly:

§ \_\_\_\_\_.6 Licenses, permits, harvest tickets, tags, and reports<sup>2</sup>

*(f) The Board may implement harvest reporting systems or permit systems where:*

*(1) The fish and wildlife is taken by an individual who is required to obtain and possess pertinent State harvest permits, tickets, or tags, or Federal permits, harvest tickets, or tags;*

*(2) A qualified subsistence user may designate another qualified subsistence user to take fish and wildlife on his or her behalf;*

*(3) The fish and wildlife is taken by individuals or community representatives permitted a one-time or annual harvest for special purposes including ceremonies and potlatches;*

*(4) The fish and wildlife is taken by representatives of a community permitted to do so in a manner consistent with the community's customary and traditional practices.*

In 1993, the Board adopted Proposal P93-12, which clarified that community harvest limits and individual harvest limits may not be accumulated, community harvest systems will be adopted on a

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<sup>2</sup> Subsequently moved to § \_\_\_\_\_.10(d)(5) *Federal Subsistence Board—Power and Duties*.

case-by-case basis and defined under unit-specific regulations, and wildlife taken by a designated hunter for another person, counts toward the individual harvest limit of the person for whom the wildlife is taken. These new regulations specified that for wildlife, after taking your individual harvest limit, you may not continue to harvest in areas outside of your community harvest area (58 Fed. Reg. 103, 31255 [June 1, 1993]). These new regulations were the following:

§ \_\_\_\_ .25 Subsistence taking of wildlife<sup>3</sup>

*(c) Possession and transportation of wildlife*

*(1) Except as specified in § \_\_\_\_ .25(c)(3)(ii) [below] or (c)(4) [trapping regulations], or as otherwise provided, no person may take a species of wildlife in any Unit, or portion of a Unit, if that person's total statewide take of that species has already been obtained under Federal and State regulations in other Units, or portions of other Units.*

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to § \_\_\_\_ .6(f)(3) [above], an animal taken by an individual as part of a community harvest limit counts toward that individual's bag limit for that species taken under Federal or State regulations for areas outside of the community harvest area.*

*(3) Individual bag limits (i) bag limits authorized by § \_\_\_\_ .25 and in State regulations may not be accumulated; (ii) Wildlife taken by a designated hunter for another person pursuant to § \_\_\_\_ .6(f)(2) [above], counts toward the individual bag limit of the person for whom the wildlife is taken.*

In 1993, “community harvest systems” were adopted by the Board simply by adding the use of designated hunters to unit-specific regulations for Unit 25 West moose and Unit 26A sheep (58 FR 103, 31252–3 [June 1, 1993]). In this way, designated harvesters and resource quotas became a common method for allocating harvests communally.

In 1996, administrative clarification was made at § \_\_\_\_ .25(c)(2) to better represent the Board's intent (61 Fed. Reg. 147, 39711 [July 30, 1996]). Before this clarification was made, a member of a community with a community harvest limit who had not taken an individual harvest limit could take an individual harvest limit after the community had met its harvest limit. The effect of the clarification was that members of community in a community harvest system can harvest only as part of the community harvest system:

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<sup>3</sup> Subsequently moved to § \_\_\_\_ .26 *Taking of wildlife*.

§ \_\_\_\_ .25 Subsistence taking of wildlife

*(c) Possession and transportation of wildlife*

...

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to § \_\_\_\_ .6(f)(3) [above], an animal taken ~~by an individual~~ as part of a community harvest limit counts toward ~~that individual's bag limit~~ **every community member's harvest limit** for that species taken under Federal or State regulations for areas outside of the community harvest area.*

Later, the language “or as otherwise provided for by this part” was added to the provision. The effect was to allow an exceptions to the provision if the exception was placed in regulation:

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts towards the community harvest limit for that species. Except for wildlife taken pursuant to § \_\_\_\_ .10(d)(5)(iii) **or as otherwise provided for by this part**, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*

In April 2020, the Board adopted deferred Proposal WP18-19 with modification, which added a community harvest system for moose in Unit 11 and caribou and moose in Unit 13 to unit-specific regulations. The modification was to name individual communities within the Ahtna traditional use territory authorized to harvest moose in Units 11 and caribou and moose in Unit 13 as part of a community harvest system, subject to a framework established by the Board under unit-specific regulations (see Existing Federal Regulation section in Proposal WP22-36 analysis).

In July 2020, the Board approved Wildlife Special Action Request WSA20-02 with modification to: (1) name individual communities authorized to participate in the community harvest system on Federal public lands in Units 11, 12, and 13, specifically, the eight Ahtna traditional communities of Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta Lake, and Tazlina; (2) define the geographic boundaries of eligible communities as the most recent Census Designated Places established by the U.S. Census Bureau; (3) extend these actions through the end of the wildlife regulatory cycle (June 30, 2022); (4) specify that harvest reporting will take the form of reports collected from hunters by AITRC and be submitted directly to the land managers and OSM, rather than through Federal registration permits, joint State/Federal registration permits, or State harvest tickets; and (5) set the harvest quota for the species and units authorized in the community harvest system as the sum of individual harvest limits for those opting to participate in the system (OSM 2020).

In January 2021, the Board approved Wildlife Special Action WSA20-07 temporarily adding the following language to unit-specific regulations for moose and caribou in Units 11, 12, and 13:

“Animals taken by those opting to participate in this community harvest system do not count toward the harvest limits of any individuals who do not opt to participate in this community harvest system.” At this meeting, the Board also approved a community harvest system framework that describes additional details about implementation of the system (see analysis of Proposal WP22-36 Appendix 1) (OSM 2021).

Currently, the following community harvest systems are codified in Federal regulations: Lime Village for Unit 19 caribou and moose; Nikolai for Unit 19 sheep; the community of Wales for Unit 22 muskoxen; Anaktuvuk Pass for Units 24 and 26 sheep; Unit 25 black bear with a State community harvest permit; Ninilchik for Kasilof River and Kenai River community gillnets for salmon; and Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta Lake, and Tazlina for moose in Unit 11 and caribou and moose in Unit 13.

### **Current Events Involving the Species**

Proposal WP22-36, submitted by AITRC, requests the Board adopt existing temporary regulations for regarding the community harvest system for moose and caribou in Unit 11, 12, and 13.

### **Cultural Knowledge and Traditional Practices**

Community harvest and designated harvester provisions provide recognition of the customary and traditional practices of sharing and redistribution of harvests. A host of research supports a need for these alternative permitting systems in Federal subsistence regulations to harmonize fundamental harvesting characteristics of rural Alaskan communities with the Federal Subsistence Management Program. Family-based production is the foundation of the mixed subsistence-cash economy found in rural Alaskan communities (cf. Wolfe 1981, 1987; Wolfe and Walker 1987; Wolfe et al. 1984). Family-based production is when two or more individual households linked by kinship distribute the responsibility to harvest, process, and store wild resources based on factors such as skills and abilities, availability of able workers, sufficient income to purchase harvesting and processing technology, and other factors. Units of family-based production typically contain at least one “super-household” that produces surpluses of wild foods (Wolfe 1987). On a statewide basis, about 30% of households in a community are super-households that produce about 70% or more of the community’s wild food harvest (Sahlins 1972; Andrews 1988; Magdanz, Utermohle, and Wolfe 2002; Sumida 1989; Sumida and Andersen 1990). Conversely, 20% to 30% of households in units of family-based production did not produce enough food to feed members of that household (Sahlins 1972). Inequalities in individual and household production levels are equalized via processes of distribution (sharing and feasting) and exchange (trade and barter).

Recent studies on disparities in household food production demonstrate that super-households participate heavily in food-sharing. Wolfe et al. (2007) looked at household food production in 67 rural Alaska communities representing Aleut, Athabascan, Inupiat, Tlingit-Haida, and Yup’ik cultural groups. The majority of these communities were comprised of mostly Alaska Native households with at least one Native head of household, although communities in Southeast Alaska were ethnically mixed. The researchers found that there were household variables commonly associated with levels of



food production throughout these communities. Household variables including higher levels of income, participation in commercial fishing, and households with three or more adult males over 15 years of age were associated with higher levels of food production. Households in which there was a single or elder head of household were associated with lower levels of food production. Most remarkably, the study also demonstrated that high-producing households gave the most food to others and giving to other households may be a primary motivation for over-production. Wolfe et al. (2007) further recommended that policy and management regulations account for food production and sharing practices within Alaskan mixed subsistence-cash communities. They wrote:

The findings about the concentration of subsistence harvests also have social policy implications for the management of hunts and fisheries. Annual and daily bag limits that require that individuals or households harvest at equal levels, as is common for sport fishing and sport hunting, operate from different principles from those operating in subsistence systems. In the subsistence system, individuals and households commonly are not equivalent producers. Instead, a relatively small segment of high-producers harvest most of the fish or game. The average harvests among community households may be in line with bag and harvest limits required for conservation reasons, but the actual production is concentrated in a small number of households. Flexible regulations that allow for this type of concentrated harvest would be most compatible with the actual patterns of subsistence production (Wolfe et al. 2007:29).

Community harvest and designated harvester systems in use in the Federal Subsistence Management Program are intended to provide some flexibility in harvest regulations to make legal the activities of super-households in rural communities. Supporting the distribution of wild foods in villages allows people to continue their subsistence way of life.

### **Effects of the Proposal**

If this proposal is adopted, then Federal regulations will recognize that the Board, when approving the framework for a community harvest system, may allow community members to choose whether they want to participate in the community harvest system or retain their individual harvest limits. The Federal regulations will specify that fish, wildlife, or shellfish harvested under a community harvest system will not count against the individual harvest limits of non-participants. Similarly, fish, wildlife, or shellfish harvested by non-participants will not count against the harvest limit set for the community harvest system. Effects to nonsubsistence uses, wildlife, fish, and shellfish, statewide, are not anticipated.

If this proposal is not adopted, then Federal regulations will continue to stipulate that any harvest within a community harvest system also counts toward the individual harvest limit of every community member regardless of whether they participate in the community harvest system. Additionally, the Board's authority to approve community harvest frameworks, and to allow community members to opt in or opt out of a community harvest, will not be clearly stated. Effects to nonsubsistence uses, wildlife, fish, and shellfish, statewide, are not anticipated.

## OSM PRELIMINARY CONCLUSION

Support Proposal WP22-01.

### Justification

Subsistence users and others will find these regulations less confusing and easier to use. In this way, the proposed regulatory changes provide more equitable harvest options and opportunities for subsistence users. They also prevent unintentional and unnecessary restrictions from being placed on any community members who choose not to participate in a community harvest system, and clarifies a current oversight in Federal regulation.

### LITERATURE CITED

- Andrews, E.F. 1988. The harvest of fish and wildlife for subsistence by residents of Minto, Alaska. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 137. Juneau, AK.
- Magdanz, J.S., C.J. Utermohle, and R. J. Wolfe. 2002. The organization of subsistence food production in two Inupiaq communities, Wales and Deering, Alaska. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 259, Juneau, AK.
- OSM. 1994. Report of the designated hunter task force. Office of Subsistence Management, USFWS, Anchorage, AK. 34 pages.
- OSM. 2020. Federal Subsistence Board News Release, July 17, 2020: Federal Subsistence Board takes action on five Wildlife Special Action Requests WSA20-01 (Unit 13 caribou), WSA20-02 (Units 11, 12, 13 moose and caribou), WSA20-03 (Unit 13 caribou), WSA20-04 (Mulchatna Caribou) and WSA20-05 (Unit 18 moose). <https://www.doi.gov/subsistence/news/general/federal-subsistence-board-takes-action-five-wildlife-special-action>. Retrieved June 15, 2021. Office of Subsistence Management, USFWS, Anchorage, AK.
- OSM. 2021. Federal Subsistence Board News Release, February 3, 2021: Federal Subsistence Board approves changes to subsistence fishing regulations. <https://www.doi.gov/subsistence/news/general/federal-subsistence-board-approves-changes-subsistence-fishing-0>. Retrieved July 14, 2021. Office of Subsistence Management, USFWS, Anchorage, AK.
- Sahlins, M D. 1972. Stone age economics. Aldine Publishing Company, New York.
- Sumida, V.A. 1989. Patterns of fish and wildlife harvest and use in Beaver, Alaska. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 140, Juneau, AK.
- Sumida, V.A, and D.B. Andersen. 1990. Patterns of fish and wildlife use for subsistence in Fort Yukon, Alaska. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 179. Juneau, AK.
- Wolfe, R.J. 1981. Norton Sound/Yukon Delta Sociocultural Systems Baseline Analysis. Alaska Department of Fish and Game Division of Subsistence Technical Report No. 59, Juneau, AK.
- Wolfe, R.J. 1987. The super-household: specialization in subsistence economies. Paper presented at the 14th Annual Meeting of the Alaska Anthropological Association, March 12-13, 1987, Anchorage, AK.

Wolfe, R.J., C.L. Scott, W.E. Simeone, C.J. Utermohle, and M.C. Pete. 2007. The “Super-Household” in Alaska Native subsistence economics. National Science Foundation, ARC 0352677. Washington DC. 31 pages.

Wolfe, R.J., J.J. Gross, S.J. Langdon, J.M. Wright, G.K. Sherrod, L.J. Ellanna, V.Sumida, and P.J. Usher. 1984. Subsistence-based economies in coastal communities of Southwest Alaska. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 59. Juneau, AK. 270 pages.

Wolfe, R.J., and R.J. Walker. 1987. Subsistence economies in Alaska: Productivity, geography, and development impacts. *Arctic Anthropology* 24(2): 56–81.

## APPENDIX 1

### STATE OF ALASKA COMMUNITY HARVEST PROGRAM

#### 5 AAC 92.074. Community subsistence harvest hunt areas

*(a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species where the Board of Game (board) has established a community harvest hunt area under (b) of this section and 5 AAC 92.074.*

*(b) The board will consider proposals to establish community harvest hunt areas during regularly scheduled meetings to consider seasons and bag limits for affected species in a hunt area. Information considered by the board in evaluating the proposed action will include*

*(1) a geographic description of the hunt area;*

*(2) the sustainable harvest and current subsistence regulations and findings for the big game population to be harvested;*

*(3) a custom of community-based harvest and sharing of the wildlife resources harvested in the hunt area by any group; and*

*(4) other characteristics of harvest practices in the hunt area, including characteristics of the customary and traditional pattern of use found under 5 AAC 99.010(b).*

*(c) If the board has established a community harvest hunt area for a big game population, residents of the community or members of a group may elect to participate in a community harvest permit hunt in accordance with the following conditions:*

*(1) a person representing a group of 25 or more residents or members may apply to the department for a community harvest permit by identifying the community harvest hunt area and the species to be hunted, and by requesting that the department distribute community harvest reports to the individuals who subscribe to the community harvest permit; the community or group representative must*

*(A) provide to the department the names of residents or members subscribing to the community harvest permit and the residents' or members' hunting license numbers, permanent hunting identification card numbers, or customer service identification numbers, or for those residents or members under 18 years of age, the resident or member's birth date;*

*(B) ensure delivery to the department of validated harvest reports from hunters following the take of individual game animals, records of harvest information for*

*individual animals taken, and collected biological samples or other information as required by the department for management;*

*(C) provide the department with harvest information, including federal subsistence harvest information, within a specified period of time when requested, and a final report of all game taken under the community harvest permit within 15 days of the close of the hunting season or as directed in the permit; and*

*(D) make efforts to ensure that the applicable customary and traditional use pattern described by the board and included by the department as a permit condition, if any, is observed by subscribers including meat sharing; the applicable board finding and conditions will be identified on the permit; this provision does not authorize the community or group administrator to deny subscription to any community resident or group member;*

*(E) from July 1, 2014 until June 30, 2018, in the community harvest hunt area described in 5 AAC 92.074(d) , permits for the harvest of bull moose that do not meet the antler restrictions for other resident hunts in the area will be limited to one permit for every three households in the community or group. Beginning July 1, 2018, in the community harvest hunt area described in 5 AAC 92.074(d) , permits for the harvest of bull moose that do not meet the antler restrictions for other resident hunts in the area will be distributed to participants using the scoring criteria described in 5 AAC 92.070.*

*(2) a resident of the community or member of the group who elects to subscribe to a community harvest permit*

*(A) may not hold a harvest ticket or other state hunt permit for the same species where the bag limit is the same or for fewer animals during the same regulatory year; however, a person may hold harvest tickets or permits for same-species hunts in areas with a larger bag limit following the close of the season for the community harvest permit, except that in Unit 13, prior to July 1, 2018, only one caribou may be retained per household, and on or after July 1, 2018, up to two caribou may be retained per household;*

*(B) may not subscribe to more than one community harvest permit for a species during a regulatory year;*

*(C) must have in possession when hunting and taking game a community harvest report issued by the hunt administrator for each animal taken;*

*(D) must validate a community harvest report immediately upon taking an animal; and*

*(E) must report harvest and surrender validated harvest reports within five days, or sooner as directed by the department, of taking an animal and transporting it to the place of final processing for preparation for human use and provide information and biological samples required under terms of the permit;*

*(F) must, if the community harvest hunt area is under a Tier II permit requirement for the species to be hunted, have received a Tier II permit for that area, species, and regulatory year.*

*(G) participants in the community harvest hunt area described in 5 AAC 92.074(d) must commit to participation for two consecutive years. This does not apply to participants that applied in 2016 for the 2018 regulatory year.*

*(3) in addition to the requirements of (1) of this subsection, the community or group representative must submit a complete written report, on a form provided by the department, for the community or group participating in the community harvest hunt area described in 5 AAC 92.074(d), that describes efforts by the community or group to observe the customary and traditional use pattern described by board findings for the game populations hunted under the conditions of this community harvest permit; in completing the report, the representative must make efforts to collect a complete report from each household that is a member of the community or group that describes efforts by the household to observe the customary and traditional use pattern using the eight elements described in this paragraph; a copy of all household reports collected by the community or group representative shall be submitted to the department as a part of the representative's written report; complete reports must include information about efforts to observe the customary and traditional use pattern of the game population, as follows:*

*(A) Element 1: participation in a long-term, consistent pattern of noncommercial taking, use, and reliance on the game population: the number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and use of areas other than the community subsistence hunt area for harvest activities;*

*(B) Element 2: participation in the pattern of taking or use of the game population that follows a seasonal use pattern of harvest effort in the hunt area: the months and seasons in which noncommercial harvest activities occur in the hunt area;*

*(C) Element 3: participation in a pattern of taking or use of wild resources in the hunt area that includes methods and means of harvest characterized by efficiency and economy of effort and cost: costs associated with harvests; and methods used to reduce costs and improve efficiency of harvest; and number of species harvested during hunting activities;*

*(D) Element 4: participation in a pattern of taking or use of wild resources that occurs in the hunt area due to close ties to the area: number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and variety of harvesting activities that take place in the hunt area; and evidence of other areas used for harvest activities;*

*(E) Element 5: use of means of processing and preserving wild resources from the hunt area that have been traditionally used by past generations: complete listing of the parts of the harvested game that are used; and preservation methods of that game; and types of foods and other products produced from that harvest;*

*(F) Element 6: participation in a pattern of taking or use of wild resources from the hunt area that includes the handing down of knowledge of hunting skills, values, and lore about the hunt area from generation to generation: involvement of multiple generations in the taking and use of the game population; and evidence of instruction and training;*

*(G) Element 7: participation in a pattern of taking of wild resources from the hunt area in which the harvest is shared throughout the community: amount of harvest of the game population that is shared; and evidence of a communal sharing event; and support of those in need through sharing of the harvest of the game population; and*

*(H) Element 8: participation in a pattern that includes taking, use, and reliance on a wide variety of wild resources from the hunt area: the variety of resource harvest activities engaged in within the hunt area; and evidence of other areas used for harvest activities.*

*(d) Seasons for community harvest permits will be the same as those established for other subsistence harvests for that species in the geographic area included in a community harvest hunt area, unless separate community harvest hunt seasons are established. The total bag limit for a community harvest permit will be equal to the sum of the individual participants' bag limits, established for other subsistence harvests for that species in the hunt area or otherwise by the board. Seasons and bag limits may vary within a hunt area according to established*

*subsistence regulations for different game management units or other geographic delineations in a hunt area.*

*(e) Establishment of a community harvest hunt area will not constrain nonsubscribing residents of the community or members of the group from participating in subsistence harvest activities for a species in that hunt area using individual harvest tickets or other state permits authorized by regulation, nor will it require any resident of the community or member of the group eligible to hunt under existing subsistence regulations to subscribe to a community harvest permit.*

*(f) The department may disapprove an application for a community subsistence harvest permit from a community or group that has previously failed to comply with requirements in (c)(1) and (3) of this section. The failure to report by the community or group representative under (c)(1) and (3) of this section may result in denial of a community subsistence harvest permit during the following regulatory year. The department must allow a representative the opportunity to request a hearing if the representative fails to submit a complete report as required under (c)(1) and (3) of this section. A community or group aggrieved by a decision under this subsection will be granted a hearing before the commissioner or the commissioner's designee, if the community or group representative makes a request for a hearing in writing to the commissioner within 60 days after the conclusion of the hunt for which the person failed to provide a report. The commissioner may determine that the penalty provided under this subsection will not be applied if the community or group representative provides the information required on the report and if the commissioner determines that*

*(1) the failure to provide the report was the result of unavoidable circumstance; or*

*(2) extreme hardship would result to the community or group.*

*(g) A person may not give or receive a fee for the taking of game or receipt of meat under a community subsistence harvest permit.*

*(h) Nothing in this section authorizes the department to delegate to a community or group representative determination of the lawful criteria for selecting who may hunt, for establishing any special restrictions for the hunt and for the handling of game, and for establishing the terms and conditions for a meaningful communal sharing of game taken under a community harvest permit.*

*(i) In this section,*

*(1) "fee" means a payment, wage, gift, or other remuneration for services provided while engaged in hunting under a community harvest permit; and does not include reimbursement for actual expenses incurred during the hunting activity within the scope of the community harvest permit, or a non-cash exchange of subsistence-harvested resources.*



*(2) a "community" or "group" is a mutual support network of people who routinely (at least several times each year) provide each other with physical, emotional, and nutritional assistance in a multi-generational and inter/intra familial manner to assure the long-term welfare of individuals, the group, and natural resources they depend on; for purposes of this regulation, a "community" or "group" shares a common interest in, and participation in uses of, an identified area and the wildlife populations in that area, that is consistent with the customary and traditional use pattern of that wildlife population and area as defined by the board.*

<b>WP22-02 Executive Summary</b>	
<b>General Description</b>	Proposal WP22-02 requests to remove language from designated hunting regulations prohibiting the use of a designated hunter permit by a member of community operating under a community harvest system. <i>Submitted by the Office of Subsistence Management.</i>
<b>Proposed Regulation</b>	See page xx
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Bristol Bay Subsistence Regional Advisory Council Recommendation</b>	
<b>Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation</b>	
<b>Western Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	

<b>WP22-02 Executive Summary</b>	
<b>Northwest Arctic Subsistence Regional Advisory Council Recommendation</b>	
<b>Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>North Slope Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

## DRAFT STAFF ANALYSIS WP22-02

### ISSUES

Wildlife Proposal WP22-02, submitted by the Office of Subsistence Management (OSM), requests to remove language from designated hunting regulations prohibiting the use of a designated hunter permit by a member of community operating under a community harvest system.

### DISCUSSION

While developing the framework for a community harvest system in summer 2020, Ahtna Intertribal Resource Commission (AITRC) representatives realized that residents of communities in a community harvest system cannot designate another person to harvest on their behalf, pursuant to Federal designated hunter regulations. AITRC and Federal agency staff perceived this provision as unfair to community members who choose not to participate in a community harvest system because their options for acquiring their individual harvest limits are curtailed involuntarily.

The proponent clarified that the intent of this proposal is to allow members of a community with a community harvest system to designate a hunter to harvest on their behalf to fulfill either their individual harvest limit or to count toward the community harvest limit depending on whether or not they choose to participate in the community harvest system.

### Existing Federal Regulation

#### **36 CFR 242 and 50 CFR 100.25(e) Hunting by designated harvest permit**

*If you are a Federally qualified subsistence user (recipient), you may designate another Federally qualified subsistence user to take deer, moose, and caribou, and in Units 1-5, goats, on your behalf unless you are a member of a community operating under a community harvest system or unless unit-specific regulations in § \_\_\_\_\_.26 preclude or modify the use of the designated hunter system or allow the harvest of additional species by a designated hunter. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time except for goats, where designated hunters may have no more than one harvest limit in possession at any one time, and unless otherwise specified in unit-specific regulations in § \_\_\_\_\_.26.*

#### **§ \_\_\_\_\_.26(n)(6)(ii) Unit 6 specific regulations**

*(D) A federally qualified subsistence user (recipient) who is either blind, 65 years of age or older, at least 70 percent disabled, or temporarily disabled may designate another federally qualified subsistence user to take any moose, deer, black bear, and beaver on his or her behalf in Unit 6, and goat in Unit 6D, unless the recipient is a member of a community operating*

*under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but may have no more than one harvest limit in his or her possession at any one time.*

**§ \_\_\_\_ .26(n)(9)(iii) Unit 9 specific regulations**

*(E) For Units 9C and 9E only, a federally qualified subsistence user (recipient) of Units 9C and 9E may designate another federally qualified subsistence user of Units 9C and 9E to take bull caribou on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report and turn over all meat to the recipient. There is no restriction on the number of possession limits the designated hunter may have in his/her possession at any one time.*

*(F) For Unit 9D, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.*

**§ \_\_\_\_ .26(n)(10) Unit 10 specific regulations**

*(iii) In Unit 10—Unimak Island only, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.*

**§ \_\_\_\_ .26(n)(22)(iii) Unit 22 specific regulations**

*(E) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients in the course of a season, but have no more than two harvest limits in his/her possession at any one time, except in Unit 22E where a resident of Wales or Shishmaref acting as a designated hunter may hunt for any number of recipients, but have no more than four harvest limits in his/her possession at any one time.*

**§ \_\_\_\_\_.26(n)(23)(iv) Unit 23 specific regulations**

*(D) For the Baird and DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipients' harvest limits in his/her possession at the same time.*

*(F) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but have no more than two harvest limits in his/her possession at any one time.*

**§ \_\_\_\_\_.26(n)(26)(iv) Unit 26 specific regulations**

*(C) In Kaktovik, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep or musk ox on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time.*

*(D) For the DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipient's harvest limits in his/her possession at the same time.*

**Proposed Federal Regulation**

**§ \_\_\_\_\_.25(e) Hunting by designated harvest permit**

*If you are a Federally qualified subsistence user (recipient), you may designate another Federally qualified subsistence user to take deer, moose, and caribou, and in Units 1-5, goats, on your behalf ~~unless you are a member of a community operating under a community harvest system or~~ unless unit-specific regulations in §100.26 preclude or modify the use of the designated hunter system or allow the harvest of additional species by a designated hunter. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no*

more than two harvest limits in his/her possession at any one time except for goats, where designated hunters may have no more than one harvest limit in possession at any one time, and unless otherwise specified in unit-specific regulations in §100.26.

**§ \_\_\_\_\_.26(n)(6)(ii) Unit 6 specific regulations**

(D) A federally qualified subsistence user (recipient) who is either blind, 65 years of age or older, at least 70 percent disabled, or temporarily disabled may designate another federally qualified subsistence user to take any moose, deer, black bear, and beaver on his or her behalf in Unit 6, and goat in Unit 6D, ~~unless the recipient is a member of a community operating under a community harvest system.~~ The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but may have no more than one harvest limit in his or her possession at any one time.

**§ \_\_\_\_\_.26(n)(9)(iii) Unit 9 specific regulations**

(E) For Units 9C and 9E only, a federally qualified subsistence user (recipient) of Units 9C and 9E may designate another federally qualified subsistence user of Units 9C and 9E to take bull caribou on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system.~~ The designated hunter must obtain a designated hunter permit and must return a completed harvest report and turn over all meat to the recipient. There is no restriction on the number of possession limits the designated hunter may have in his/her possession at any one time.

(F) For Unit 9D, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system.~~ The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.

**§ \_\_\_\_\_.26(n)(10) Unit 10 specific regulations**

(iii) In Unit 10—Unimak Island only, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system.~~ The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.

**§ \_\_\_\_\_.26(n)(22)(iii) Unit 22 specific regulations**

*(E) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients in the course of a season, but have no more than two harvest limits in his/her possession at any one time, except in Unit 22E where a resident of Wales or Shishmaref acting as a designated hunter may hunt for any number of recipients, but have no more than four harvest limits in his/her possession at any one time.*

**§ \_\_\_\_\_.26(n)(23)(iv) Unit 23 specific regulations**

*(D) For the Baird and DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipients' harvest limits in his/her possession at the same time.*

*(F) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but have no more than two harvest limits in his/her possession at any one time.*

**§ \_\_\_\_\_.26(n)(26)(iv) Unit 26 specific regulations**

*(C) In Kaktovik, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep or musk ox on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time.*

*(D) For the DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipient's harvest limits in his/her possession at the same time.*



**Existing State Regulation**

The State of Alaska provides for the transfer of harvest limits from one person to another through its proxy hunting program (5 AAC 92.011; see **Appendix 1**). **Table 1** is a side-by-side comparison of the State’s proxy system to the Federal designated hunter system.

**Table 1.** State of Alaska Proxy System compared to Federal Designated Hunter System.

<b>State of Alaska Proxy System</b>	<b>Federal Subsistence Management Program Designated Hunter System</b>
Applies where there is an open State harvest season.	Applies to Federal public lands when there is an open Federal harvest season.
Applies to caribou, deer, and moose.	Applies to caribou, deer, moose, and in Units 1–5, goats, as well as other species identified in unit-specific regulations.
Available to a hunter who is blind, physically or developmentally disabled (requires physician’s affidavit), or 65 years of age or older	Available to Federally qualified subsistence users.
Either the recipient or the hunter may apply for the authorization.	Recipient obtains a permit or harvest ticket and designates another Federally qualified subsistence user to harvest on his/her behalf. Designated hunter obtains a Federal designated hunter permit.
No person may be a proxy for more than one recipient at a time.	A person may hunt for any number of recipients, but may have no more than two harvest limits in his/her possession at any one time.
Antler destruction is required.	No antler destruction is required.

**Federal Public Lands**

Federal public lands comprise approximately 54% of Alaska statewide and consist of 36% U.S. Fish and Wildlife Service managed lands, 28% Bureau of Land Management managed lands, 25% National Park Service managed lands, and 11% U.S. Forest Service managed lands.

**Customary and Traditional Use Determination**

This is a statewide proposal regarding wildlife.

**Regulatory History**

In 1991, after extensive public comment on the Federal Subsistence Management Program’s first Temporary Rule, the Federal Subsistence Board committed to addressing community harvest limits and alternative permitting processes (56 Fed. Reg. 123, 29411 [June 26, 1991]).

In 1992, responding to approximately 40 proposals requesting community harvest systems and numerous public comments requesting alternative permitting systems, the Board supported the concept of adjusting seasons and harvest limits based on customs and traditions of a community (57 Fed. Reg. 103, 22531–2 [May 28, 1992]). The Board said specific conditions for the use of a particular harvest reporting system may be applied on a case-by-case basis and further development and refinement of guidelines for alternative permitting systems would occur as the Federal Subsistence Management Program evolved (57 Fed. Reg. 104, 22948 [May 29, 1992]). These regulations at \_\_\_\_\_.6 were modified to state that intent more clearly:

§ \_\_\_\_\_.6 Licenses, permits, harvest tickets, tags, and reports<sup>1</sup>

*(f) The Board may implement harvest reporting systems or permit systems where:*

*(1) The fish and wildlife is taken by an individual who is required to obtain and possess pertinent State harvest permits, tickets, or tags, or Federal permits, harvest tickets, or tags;*

*(2) A qualified subsistence user may designate another qualified subsistence user to take fish and wildlife on his or her behalf;*

*(3) The fish and wildlife is taken by individuals or community representatives permitted a one-time or annual harvest for special purposes including ceremonies and potlatches;*

*(4) The fish and wildlife is taken by representatives of a community permitted to do so in a manner consistent with the community's customary and traditional practices.*

In 1993, the Board adopted Proposal P93-12, which clarified that community harvest limits and individual harvest limits may not be accumulated, community harvest systems will be adopted on a case-by-case basis and defined under unit-specific regulations, and wildlife taken by a designated hunter for another person, counts toward the individual harvest limit of the person for whom the wildlife is taken. These new regulations specified that for wildlife, after taking your individual harvest limit, you may not continue to harvest in areas outside of your community harvest area (58 Fed. Reg. 103, 31255 [June 1, 1993]). These new regulations were the following:

§ \_\_\_\_\_.25 Subsistence taking of wildlife<sup>2</sup>

*(c) Possession and transportation of wildlife*

*(1) Except as specified in § \_\_\_\_\_.25(c)(3)(ii) [below] or (c)(4) [trapping regulations], or as otherwise provided, no person may take a species of wildlife in any Unit, or portion of a Unit, if that person's total statewide take of that species has already been obtained under Federal and State regulations in other Units, or portions of other Units.*

<sup>1</sup> Subsequently moved to § \_\_\_\_\_.10(d) Federal Subsistence Board—Power and Duties.

<sup>2</sup> Subsequently moved to § \_\_\_\_\_.26 Taking of wildlife.

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to § \_\_\_\_ .6(f)(3) [above], an animal taken by an individual as part of a community harvest limit counts toward that individual's bag limit for that species taken under Federal or State regulations for areas outside of the community harvest area.*

*(3) Individual bag limits (i) bag limits authorized by § \_\_\_\_ .25 and in State regulations may not be accumulated; (ii) Wildlife taken by a designated hunter for another person pursuant to § \_\_\_\_ 6(f)(2) [above], counts toward the individual bag limit of the person for whom the wildlife is taken.*

In 1993, community harvest strategies were adopted by the Board simply by adding the use of designated hunters into unit-specific regulations for Unit 25 West moose and Unit 26C sheep (58 Fed. Reg. 103, 31252–3 [June 1, 1993]). In this way, designated harvesters and resource quotas became a common method for allocating harvests communally.

*Unit 25(D)(West)—. . . 1 antlered moose by a Federal registration permit. Alternate permits allowing for designated hunters are available to qualified applicants who reside in Beaver, Birch Creek, or Stevens Village. Moose hunting on public land in this portion of Unit 25(D)(West) is closed at all times except for residents of Beaver, Birch Creek and Stevens Village during seasons identified above. The moose season will be closed when 30 antlered moose have been harvested in the entirety of Unit 25D West (58 Fed. Reg. 103, 31287 [June 1, 1993]).*

*Unit 26(C)—3 sheep per year; the Aug. 10–Sept 20 season is restricted to 1 ram with 7/8 curl horn or larger. A State registration permit is required for the Oct. 1–Apr. 30 season, except for residents of the City of Kaktovik. Kaktovik residents may harvest sheep in accordance with a Federal community harvest strategy for Unit 26(C) which provides for the take of up to two bag limits of 3 sheep by designated hunter. Procedures for Federal permit issuance and community reporting will be mutually developed by Kaktovik and Federal representatives prior to the season opening. Open season: Aug. 10–Sept. 30 and Oct. 1–Apr. 30 (58 Fed. Reg. 103, 31289 [June 1, 1993]).*

In 1994, the Board rejected four proposals concerning the use of designated hunters to harvest wildlife for others and redirected staff to work with Regional Advisory Councils and develop regulations for the 1995/96 regulatory year that address designated harvesters on a state-wide basis (59 Fed. Reg. 29033, June 3, 1994).

In October 1994, a Designated Hunter Task Force published its report describing four options for alternative permitting systems (OSM 1994).

In 1996, administrative clarification was made at § \_\_\_\_ .25(c)(2) to better represent the Board’s intent (61 Fed. Reg. 147, 39711 [July 30, 1996]). Before this clarification was made, a member of a community with a community harvest limit who had not taken an individual harvest limit could take an individual harvest limit after the community had met its harvest limit. The effect of the clarification was that members of community in a community harvest system can harvest only as part of the community harvest system:

§ \_\_\_\_ .25 Subsistence taking of wildlife

*(c) Possession and transportation of wildlife*

...

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to § \_\_\_\_ .6(f)(3) [above], an animal taken ~~by an individual~~ as part of a community harvest limit counts toward ~~that individual’s bag limit~~ **every community member’s harvest limit** for that species taken under Federal or State regulations for areas outside of the community harvest area.*

Later, the language “or as otherwise provided for by this part” was added to the provision. The effect was to allow an exception to the provision if the exception was placed in regulation:

*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts towards the community harvest limit for that species. Except for wildlife taken pursuant to § \_\_\_\_ .10(d)(5)(iii) **or as otherwise provided for by this part**, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*

In 2001, administrative clarifications were added to regulations at § \_\_\_\_ .25(e) *Hunting by designated harvest permit*. New provisions stipulated that a designated hunter recipient may not be a member of a community operating under a community harvest system, reflecting § \_\_\_\_ .25(c)(2), above (66 Fed. Reg. 122, 33758 [June 25, 2001]). These new provisions were the following:

§ \_\_\_\_ .25 Subsistence taking of fish, wildlife, and shellfish: general regulations<sup>3</sup>

*(e) Hunting by designated harvest permit*

*(1) As allowed by § \_\_\_\_ .26 [Subsistence taking of wildlife], if you are a Federally-qualified subsistence user, you (beneficiary) may designate another Federally-qualified*

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<sup>3</sup> § \_\_\_\_ .25 was formerly *Subsistence taking of wildlife* that was moved to § \_\_\_\_ .26 to make room for these *general regulations*.

*subsistence user to take wildlife on your behalf **unless you are a member of a community operating under a community harvest system.***

*(2) The designated hunter must obtain a designated hunter permit and must return a completed harvest report.*

*(3) You may not designate more than one person to take or attempt to take fish on your behalf at one time.*

*(4) The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time, unless otherwise specified in § \_\_\_\_\_.26.*

After 1994, the Board recommenced adopting designated harvester provisions in unit-specific regulations through 2002.

Prior to 2003, the Board adopted designated hunter regulations for 21 unit-specific hunts. In 2003, the Board established the statewide designated hunter system, based on Regional Advisory Council recommendations, providing opportunities for subsistence users to receive deer, caribou, and moose from designated hunters, subject to unit-specific regulations to include other species and special provisions (68 Fed. Reg. 38466 [June 27, 2003]). Where Councils agreed with these general statewide provisions, then unit-specific regulations were rescinded unless they included other species or special provisions.

In April 2020, the Board adopted deferred Proposal WP18-19 with modification to establish a community harvest system moose in Units 11 and caribou and moose in Unit 13 that will be administered by the Ahtna Intertribal Resource Commission (AITRC). The modification was to name individual communities within the Ahtna traditional use territory authorized to harvest caribou and moose in Unit 13 and moose in Unit 11 as part of a community harvest system, subject to a framework established by the Board under unit specific regulations. While developing the framework for the community harvest system over the summer of 2020, AITRC representatives and Federal agency staff realized that current Federal regulations prevent the use of designated hunters by any community member whether or not they choose to participate in the community harvest system (OSM 2020). In January 2021, the Board approved the community harvest system framework that describes additional details about implementation of the system (OSM 2021a).

## **Harvest History**

The Designated Hunter Permit database is maintained at the Office of Subsistence Management. **Table 2** describes the use of the designated hunter system since 2002 when the permit system was implemented. Designated hunters have reported harvesting caribou, deer, moose, sheep, goats, and muskoxen. Most of the reported harvest by designated hunters is for deer (84%, or 4,717, ), and most of those are taken from Southeast Alaska (Units 1–5). Designated hunter harvests of caribou account for 12% (658 caribou), and moose 4% (212 moose).

**Table 2.** Use of Federal designated hunter system based on completed harvest reports 2002-2020 cumulative, by species and management unit (OSM 2021b).

Management Unit	Number of Animals Harvested by Designated Hunters 2002-2020
<b>Caribou</b>	
9	4
12	109
13	477
17	8
18	6
20	31
Unknown	23
Total	658
<b>Dall Sheep</b>	
23	3
<b>Deer</b>	
1	57
2	146
3	1,178
4	22
6	0
8	10
2	727
4	1,836
5	11
6	3
8	672
Unknown	55
Total	4,717
<b>Moose</b>	
1	9
3	9
5	34
6	36
11	7
12	1
13	67
15	18
18	3
19	12
21	2
24	5
25	1
26	2
Unknown	6
Total	212

*Continued on next page.*

*Continued from previous page.*

Management Unit	Number of Animals Harvested by Designated Hunters 2002-2020
<b>Mountain Goats</b>	
1	1
4	5
Total	6
<b>Muskoxen</b>	
22	3

### **Cultural Knowledge and Traditional Practices**

See the Cultural Knowledge and Traditional Practices section in the Proposal WP22-01 analysis.

### **Effects of the Proposal**

If this proposal is adopted, then Federal designated hunter regulations will no longer preclude members of communities with a community harvest system from designating another person to take wildlife on their behalf to fulfill either their individual harvest limit or count toward the community harvest limit, pursuant to Federal designated hunter regulations. Effects to nonsubsistence uses or wildlife are not anticipated.

If this proposal is not adopted, then Federal designated hunting regulations will continue to preclude residents of communities in a community harvest system from designating another person to take wildlife on their behalf, even though some residents may choose not to participate in the community harvest system. Effects to nonsubsistence uses or wildlife are not anticipated.

### **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP22-02.

### **Justification**

The intent of the proposed regulation change is to allow members of a community with a community harvest system to designate another person to harvest on their behalf to meet either their individual harvest limit or count toward the community harvest limit, pursuant to Federal designated harvester regulations. Therefore, the statements in general and unit-specific regulations addressed by this proposal, WP22-02, will no longer be relevant and should be removed. Additionally, these regulatory changes will provide more equitable harvest options and opportunities for subsistence users.

## LITERATURE CITED

OSM. 1994. Report of the designated hunter task force. Office of Subsistence Management, USFWS. Anchorage, AK. 34 pages.

OSM. 2020. Federal Subsistence Board News Release, April 29, 2020: Federal Subsistence Board approves changes to subsistence hunting and trapping regulations. <https://www.doi.gov/subsistence/news/general/federal-subsistence-board-approves-changes-subsistence-hunting-and-0>. Retrieved, July 14, 2020. Office of Subsistence, USFWS, Anchorage, AK.

OSM. 2021a. Federal Subsistence Board News Release, February 3, 2021: Federal Subsistence Board approves changes to subsistence fishing regulations. <https://www.doi.gov/subsistence/news/general/federal-subsistence-board-approves-changes-subsistence-fishing-0>. Retrieved July 14, 2021. Office of Subsistence Management, USFWS, Anchorage, AK.

OSM 2021b. Federal permit system. Electronic database. Office of Subsistence Management, USFWS, Anchorage, AK.



## APPENDIX 1

### STATE PROXY HUNTING REGULATIONS

#### **5 AAC 92.011. Taking of game by proxy**

*(a) A resident hunter (the proxy) holding a valid resident hunting license may take specified game for another resident (the beneficiary) who is blind, physically or developmentally disabled, or 65 years of age or older, as authorized by AS 16.05.405 and this section.*

*(b) Both the beneficiary and the proxy must possess copies of a completed proxy authorization form issued by the department. The completed authorization must include*

*(1) names, addresses, hunting license numbers, and signatures of the proxy and the beneficiary;*

*(2) number of the required harvest ticket report or permit harvest report;*

*(3) effective dates of the authorization; and*

*(4) signature of the issuing agent.*

*(c) A proxy authorization may not be used to take a species of game for a beneficiary for more than the length of the permit hunt season listed on the proxy authorization or for the maximum length of the species general season listed on the proxy authorization.*

*(d) A person may not be a proxy*

*(1) for more than one beneficiary at a time;*

*(2) more than once per season per species in Unit 13;*

*(3) for Tier II Caribou in Unit 13, unless the proxy is a Tier II permittee;*

*(4) for more than one person per regulatory year for moose in Units 20(A) and 20(B).*

*(e) Repealed 7/26/97.*

*(f) A proxy who takes game for a beneficiary shall, as soon as practicable, but not later than 30 days after taking game, personally deliver all parts of the game removed from the field to the beneficiary.*

*(g) Except for reporting requirements required by (h) of this section, a proxy who hunts or kills game for a beneficiary is subject to all the conditions and requirements that would apply to the beneficiary if the beneficiary personally hunted or killed the game.*

*(h) Reporting requirements for proxy and beneficiary are as follows:*

*(1) if the proxy takes the bag limit for the beneficiary, the proxy shall provide the beneficiary with all the information necessary for the beneficiary to complete and return the harvest ticket report or permit harvest report, as required by regulation, to the department within the time periods specified for such reports; the beneficiary is responsible for the timely return of the harvest ticket and permit harvest reports;*

*(2) if the proxy is unsuccessful or does not take the bag limit for the beneficiary, the proxy shall provide the beneficiary with any information necessary for the beneficiary to complete and return the harvest ticket report or permit harvest report, as required by regulation, to the department within the time periods specified for such reports; the beneficiary is responsible for the timely return of the harvest ticket and permit harvest reports;*

*(3) the department may require the proxy to complete a proxy hunter report issued with the authorization form and mail it to the department within 15 days after the effective period of the authorization.*

*(i) A person may not give or receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.*

*(j) A proxy participating in a proxy hunt must remove at least one antler from the skull plate or cut the skull plate in half, on an antlered animal, for both the proxy's animal and the beneficiary's animal before leaving the kill site, unless the department has established a requirement that complete antlers and skull plates must be submitted to the department.*

*(k) Proxy hunting under this section is only allowed for*

*(1) caribou;*

*(2) deer;*

*(3) moose in Tier II hunts, any-bull hunts, and antlerless moose hunts; and*

*(4) emperor geese.*

*(l) Notwithstanding (k) of this section, proxy hunting is prohibited in the following hunts where the board has determined that the use of the proxy would allow circumvention of harvest restrictions specified by the board, or where the board has otherwise directed:*

*(1) Unit 20(E) moose registration hunts and Units 20(B), 20(D), 20(E), 20(F), and 25(C) Fortymile and White Mountains caribou registration hunts;*

*(2) Units 21(B), 21(C), 21(D), and 24 moose hunts if either the proxy or the beneficiary holds a drawing permit for Units 21(B), 21(C), 21(D), or 24 moose hunts;*

*(3) Units 9(A) and 9(B), unit 9(C), that portion within the Alagnak River drainage, and units 17(B), 17(C), 18, 19(A), and 19(B) caribou hunts from August 1 through October 31;*

*(4) Unit 5(A) deer hunts from October 15 through October 31;*

*(5) Unit 20(D), within the Delta Junction Management Area, the moose drawing hunt for qualified disabled veterans.*

<b>WP22-37 Executive Summary</b>	
<b>General Description</b>	Proposal WP22-37 requests that the Federal Subsistence Board recognize the customary and traditional use of ptarmigan in Unit 9D by residents of Cold Bay, King Cove, Sand Point, Belkofski, Sanak, Pauloff Harbor, Unga, and Nelson Lagoon. <i>Submitted by: Della Trumble.</i>
<b>Proposed Regulation</b>	<b>Customary and Traditional Use Determination--Ptarmigan</b>  <i>Unit 9D                    <del>All rural residents</del> Residents of Cold Bay, King Cove, Sand Point, Belkofski, Sanak, Pauloff Harbor, Unga, and Nelson Lagoon.</i>
<b>OSM Preliminary Conclusion</b>	<b>Support</b> Proposal WP22-37 <b>with modification</b> to recognize the customary and traditional use of ptarmigan by residents of Unit 9D.  The modified regulation should read:  <b>Customary and Traditional Use Determination— Ptarmigan</b>  <i>Unit 9D                    <del>All rural residents</del> Residents Unit 9D</i>
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	None

## DRAFT STAFF ANALYSIS WP22-37

### ISSUES

Wildlife Proposal WP22-37, submitted by Della Trumble of King Cove, requests a change to the customary and traditional use determination for ptarmigan in Unit 9D from all rural residents to residents of Cold Bay, King Cove, Sand Point, Belkofski, Sanak, Pauloff Harbor, Unga, and Nelson Lagoon.

### DISCUSSION

In the proposal the proponent shares:

The Ptarmigan population has been declining in Unit 9D. Federal and State biologists currently do not have population estimates. The status of the ptarmigan population are currently based on hunter reports and observations. Ptarmigan are an important resource for the residents of Unit 9D. Establishing a regional Customary and Traditional Use Determination for ptarmigan will allow managers to restrict harvest when the ptarmigan population has reached a level of conservation concern. Restrictions could close the season for nonresidents and allow for subsistence harvest by residents that have a Customary and Traditional Use Determination for ptarmigan.

Through proposal WP22-37, the proponent requests the evaluation of the uses of ptarmigan by rural residents of Cold Bay, King Cove, Sand Point, Belkofski, Sanak, Pauloff Harbor, Unga, and Nelson Lagoon. There has not been any Federal determinations made for customary and traditional uses of ptarmigan in Unit 9D.

#### Existing Federal Regulation

##### Customary and Traditional Use Determination—Ptarmigan

<i>Unit 9D</i>	<i>All rural residents.</i>
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#### Proposed Federal Regulation

##### Customary and Traditional Use Determination— Ptarmigan

<i>Unit 9D</i>	<del><i>All rural residents.</i></del> <i>Residents of Cold Bay, King Cove, Sand Point, Belkofski, Sanak, Pauloff Harbor, Unga, and Nelson Lagoon.</i>
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#### Extent of Federal Public Lands

Unit 9D is comprised of approximately 45% of Federal public lands and consists of just under 100% U.S.

Fish and Wildlife Service managed lands with a small portion of Bureau of Land Management managed lands (see **Unit Map**).

### **Regulatory History**

In 1990, the Federal Subsistence Board (Board) assumed subsistence management responsibilities on Federal public lands and adopted existing State customary and traditional use determinations. The State did not recognize customary and traditional uses of ptarmigan in Unit 9D, and no proposals to change customary and traditional uses of ptarmigan in Unit 9D have been submitted since the inception of the program. Therefore, all rural residents are eligible to hunt ptarmigan during Federal seasons (57 FR 22961; May 29, 1992).

In February of 2018 the BOG adopted Proposal 134 to shorten the season for ptarmigan and reduce the daily harvest and possession limits in Unit 9. This proposal was adopted due to observed declines in ptarmigan populations in Unit 9 since 2014, and ongoing public concern pertaining to the decline in the region. A year later, the Board passed proposal WP20-31 that likewise reduced the bag limit and season of ptarmigan, matching those of BOG. The current season for ptarmigan in Unit 9 is August 10-the last day of February; the bag limit is 10 ptarmigan a day and 20 in possession.

### **Background: Harvest History**

There is limited information on harvest history of ptarmigan in Unit 9D. Data on harvesting ptarmigan comes from a bird-health study in which harvesters voluntarily send the Alaska Department of Fish and Game (ADF&G) wings, tails, and heads of all species of grouse and ptarmigan (Merizon and Carroll 2021, 2019, 2017). In regulatory year 2014/15, 27 total wings from willow and rock ptarmigan wings were collected from users in Unit 9 (Merizon and Carroll 2017). Eleven wings were collected in Unit 9 during regulatory year 2017/17 (Merizon and Carroll 2019), and less were collected in 2018/19 (Merizon and Carroll 2021). No inferences on ptarmigan harvesting or production can be made from the data (Merizon and Carroll 2019, 2020, 2021).

### **Community Characteristics**

The proposal seeks to change the customary and traditional use determination for ptarmigan in Unit 9D from all rural residents to residents of Cold Bay, King Cove, Sand Point, Belkofski, Sanak, Pauloff Harbor, Unga, and Nelson Lagoon. All communities, current and historic, are located within Unit 9D. Belkofski, Sanak, Pauloff Harbor, and Unga are no longer occupied historic settlements and will not be further considered in the analysis. The communities of Cold Bay, King Cove, Nelson Lagoon, and Sand Point are currently occupied year-round by residents.

### Unit 9D Area History

The archeological record indicates that there have been human populations in the western end of the Alaska Peninsula for at least 9,000 (Reedy, in print 2021). Two Alaska indigenous groups, Unangan and

Alutiiq, are known to have historically inhabited and hunted in Unit 9D. Euro western explorers, missionaries, and entrepreneurs started residing in the region by the 1700s. Russian traders and explorers travelled to the Aleutian Islands and up the Alaska coast in the mid-eighteenth century (McCartney 1984; Clark 1984). Russia claimed sovereignty over Alaska for 126-years, providing opportunities for Russian and other European explorers to settle and search for commercial resources including sea-otter pelts (McCartney 1984, Partnow 2001, Morseth 2003). Intermarriages between indigenous people, Russians, and others of European heritage took place as both Russian and Europeans settled into indigenous territories (Partnow 2001). The influx of immigrants from Europe and the United States to the Alaska Peninsula increased after Russia sold Alaska to the United States in 1867 (Morseth 2003).

### Cold Bay

Cold Bay is situated on the farthest western extent of the Alaskan Peninsula, approximately 634 miles southwest of Anchorage. It is the site of the former World War II air base of Fort Randall and the current headquarters of the Izembek National Wildlife Refuge. In 2020, the US Census estimated the Cold Bay population to be 76, down 22 persons from the last census in 2010. Despite its small population size, it has one of the largest runways in the state and serves as regional a transportation hub.

### King Cove

King Cove is located across the bay from the community of Cold Bay and travel between the two is limited to boat or plane. King Cove was founded to support commercial fishing and canning operations. Early settlers to the community included Unangan, Scandinavian, and others of European heritage. The community is still one of the largest in the region, with a population of 900 residents (US Census 2020). The economy remains dependent on commercial fisheries and seafood processors.

### Nelson Lagoon

Nelson Lagoon is the smallest community in Unit 9D and the only one located on the north side of the Alaska Peninsula. Nelson Lagoon was a seasonal fish camp, and then the location of a salmon saltery between 1906 and 1923. Nelson Lagoon became a permanent community with the opening of a school in 1965. The area supports a commercial fishery with most operations based out of the seasonally occupied Port Moller, which is across the lagoon. In 2020, the U.S. Census estimated the Nelson Lagoon population to be 32, down 18 persons from the last census in 2010.

### Sand Point

Sand Point is the eastern most community within Unit 9D on the south side of the Alaska Peninsula. The community has a similar history to King Cove and Nelson Lagoon. Founded in 1898 by Scandinavian fishers as a base for commercial cod fishing and trade, Sand Point was settled by local Unangan people and others of European heritage. Sand Point continues to be a thriving commercial fishing community. In 2020, the US Census estimated the Sand Point population to be 880, down 96 persons from the 2010

census.

### **Eight Factors for Determining Customary and Traditional Use**

A community or area's customary and traditional use is generally exemplified through the eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use that includes handing down knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use that relates to reliance upon a wide diversity of fish and wildlife resources of the area and provides substantial cultural, economic, social, and nutritional elements to the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board uses the eight factors to consider the pool of users who exhibits customary and traditional use. It is not necessary for to exhibit all eight factors to be recognized for customary and traditional use. In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board does not use customary and traditional use determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through proposals for imposition of harvest limits or season restrictions.

If a proposal is received requesting a customary and traditional use determination where none has been made previously for the resource, as is the case for ptarmigan in Unit 9D, the analyst evaluates use by rural residents who may, within reason, harvest the resource within the geographic boundaries defined by the proponent in the request. Records on harvesting data is limited (see Harvesting History section above). Community mapping suggests that residents harvest ptarmigan locally (Reedy 2021). This analysis therefore evaluates use of ptarmigan in Unit 9D by residents of permanent communities within that subunit: Cold Bay, King Cove, Sand Point, and Nelson Lagoon.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process and present recommendations for regulatory changes. At its fall 2013 meeting, the Southcentral Alaska Subsistence Regional Advisory Council made a recommendation to “change the way such determinations are made by making area-wide customary and traditional use determinations for all species,” and supported other Regional Advisory Councils when choosing a process that works best in their regions (SCSRAC 2013:107–110). In June 2016, the Board clarified that the eight-factor analysis applied when considering customary and traditional use



determinations is intended to protect subsistence use rather than limit it. The Board stated that the goal of the customary and traditional use determination analysis process is to recognize customary and traditional uses in the most inclusive manner possible

### Cold Bay

The Board has recognized Cold Bay's customary and traditional uses of brown bear in Units 9D and 10 (Unimak Island) and caribou, moose, and wolf in Unit 9D.

Many residents of Cold Bay harvest wild food resources. In a 2016 ADF&G (2021a) comprehensive subsistence harvesting study, 23 out of an estimated 32 households were surveyed in Cold Bay, covering 45 out of an estimated 63 residents. All households surveyed reported that they used subsistence resources. An average of 232 lbs. of wild resources were harvested per person surveyed. Approximately 72% (168 lbs. per person) of the harvest was fish, most of which was salmon (64% of the total harvest). Large land mammals made up 13% of the harvest at 30 lbs. per person. Birds and eggs made up about 7% of the harvest at 17 lbs. per person. In addition to household consumption, most households also participate in resource sharing and other forms of redistribution. Twenty-two households (96% of the survey sample) reported receiving resources shared by others, and 20 households (87%) reported sharing resources with others.

Birds and eggs play a role in residents' customs and practices, including resource redistribution. For all birds and eggs, including those of ptarmigan, 15 of the 23 households surveyed (65% of the sample) reported using birds and eggs, and 10 households (43% of the sample) reported attempted harvest of birds and eggs (ADF&G 2021a). For resource sharing and redistribution, 11 households (48% of the sample) reported receiving birds and eggs from others, and 6 households (26% of the sample) reported sharing their harvest of birds and eggs.

One of the birds harvested by residents of Cold Bay is ptarmigan. Of those households surveyed, 6 households (26% of the sample) reported using ptarmigan, 7 households (30% of the sample) reported attempting to harvest ptarmigan, 4 households (17% of the sample) reported receiving ptarmigan, and 3 households (13% of the sample) reported sharing their harvest of ptarmigan with others (ADF&G 2021a). Those surveyed reported to have harvested a total of 20.79 lbs., which is an average of 0.90 lbs. per household and 0.46 lbs. per capita. It is estimated that the total harvest of ptarmigan for the community is 28.92 lbs. The amount of ptarmigan harvested accounts for less than 1% of the total amount of resources harvested.

Residents of Cold Bay harvest ptarmigan locally. The harvesting locations of 6 households were mapped in Reedy's 2021 subsistence survey. The exact locations of ptarmigan harvesting were not disclosed. Regardless, the maps demonstrate that Cold Bay residents harvest birds and eggs locally, within 30 miles of the community (Reedy 2021: 94).

### King Cove

The Board recognized King Cove's customary and traditional uses of brown bear, caribou, moose, and

wolf in Unit 9D.

Like Cold Bay, most residents of King Cove also harvest wild foods. In 2016, ADF&G (2021b) surveyed 91 out of an estimated 172 occupied residences in King Cove, accounting for 279 of the estimated 527 residents, using for a report on harvesting and use of subsistence resources. Of those 91 households, 88 households (96.7% of the sample) reported that they used and harvested wild resources. Additionally, 81 households (89% of the sample) reported receiving resources shared by others, and approximately 74% of the surveyed households reported sharing resources with others. The per person harvest for the study year was 297 lbs. 77% of the harvest was fish (228 lbs per person), with salmon alone being 65% of the total reported harvest (191 lbs. per person). Large land mammals made up 6% of the harvest (17 lbs. per person).

For all birds and eggs, including those of ptarmigan, 55 households (60% of the sample) reported using birds and eggs. 40 households (44% of the sample) reported attempted harvest of birds and eggs, 35 households (38% of sample) reported that they harvested them (ADF&G 2021b). Survey participants reported harvesting 4,790 total eggs and birds, and it is estimated that the whole community harvested 9,053 of them. The amount of eggs and birds harvested accounts for 3% of the total amount of resources that participants reported harvesting, which is an average of 7 lbs. per person. In terms of resources sharing, 30 households (33% of the sample) reported receiving birds and eggs from others, and 17 households (19% of samples) reported giving them.

Residents harvested and shared ptarmigan. Ptarmigan was used by 21 of the households surveyed (23% of the sample, ADF&G 2021b). 18 households (20% of sample) reported attempting to harvest ptarmigan. Surveyed households reported a total of 194 ptarmigan, and it is estimated that all community members harvested a total of 367 ptarmigan. By total mass, surveyed participants harvested an average of 0.5 lbs. of ptarmigan per person, which is less 0.2% of the total amount of resources harvest. Six of the households surveyed (7% of the sample) reported that they received ptarmigan from others, and two households (2% of the sample) reported giving them.

Much like the residents of Cold Bay, residents of King Cove harvest ptarmigan locally. Forty-four households reported their harvesting locations on the recent subsistence survey conducted by Reedy (2021: 94). All locations were within 30 miles of the community. Likewise, Reedy (2021:70) reported that “ptarmigan were hard to find and many people believed them to be overhunted. Many households said they did not go hunting because the population is depressed.”

### Nelson Lagoon

The Board has recognized Nelson Lagoon’s customary and traditional uses of brown bear, caribou, moose, and wolf in Unit 9D.

Wild resources have been important to residents of Nelson Lagoon residents. In a 2009 comprehensive household subsistence survey, Reedy-Maschner and Maschner (2012) interviewed 22 out of an estimated 24 occupied households. Survey participants reported harvesting a total of 13,613 lbs of food, which averages 261 lbs. per person. It is estimated that the whole community harvests 14,851 lbs of wild foods.

The composition of the reported community harvest was 10,694 lbs. of salmon (72% of total harvest, 1,460 lbs. of plants (10% of total harvest, 954 lbs. of land mammals (6% of total harvest, 882 lbs. of non-salmon fish (6% of total harvest, 680 lbs. of birds and eggs (5% of total harvest, and 181 lbs. of shellfish (1% of total harvest. Resource sharing, or redistribution, has been important to Nelson Lagoon residents. Based on the interviews with participants in 2009, it is estimated that 2,889 pounds (or 18% of all wild food consumed were received from others (Reedy-Maschner and Maschner, 2012. In a 1987 ADF&G (2021b comprehensive household subsistence survey, all 13 households surveyed out of an estimated 18 total households claimed they both gave wild resources to others and received.

Ptarmigan has been an important resource in Nelson Lagoon than in the other three communities. The 1987 ADF&G (2021c subsistence household survey reports that 12 of the 13 surveyed household claimed they used ptarmigan. This was the same number of people who reported using any birds and eggs. Despite its small size, ptarmigan has been one of the most harvested resources by residents: ptarmigan was the ninth ranked species harvested by total weight in 1987, and the 10<sup>th</sup> ranked species in 2009 (Reedy-Maschner and Maschner, 2012. In 1987, 11 households reported that they attempted to harvest ptarmigan (85% of the sample, and all harvesters were successful. Participants reported harvesting a total of 378 ptarmigan, which was an average of 4 lbs per person and the most harvested of all birds. It is estimated that the whole community, consisting of an estimated 18 occupied households, harvested a total of 523 ptarmigan (ADF&G 2021c. The 2009 estimate for total community total harvest was 165 lbs., with an average of 3 lbs. per person. (Reedy-Maschner and Maschner, 2012. Redistribution of ptarmigan also demonstrates its importance to Nelson Lagoon residents. In 1987, 6 households (46% of the sample claimed that they gave ptarmigan to others and the same amount reported that they received it (ADF&G 2021c.

### Sand Point

The Board has recognized Sand Point's customary and traditional uses of brown bear, caribou, moose, and wolf in Unit 9D.

Wild resources are also important to households in Sand Point. One-hundred-and-one households out of an estimated 248 occupied residences participated in ADF&G's 2016 comprehensive household survey, covering 269 out of the 509 estimated residents (ADF&G 2021c. Ninety-seven of those participating households (96% of the households used and harvested wild resources; 95 households (94% of the sample reported receiving resources shared by others; and 78 households (77% of the sample reported sharing resources with others. Households reported harvesting a total of 86,488 lbs. of wild food, or an average of 324 lbs. per person. It is estimated that the whole community harvested 164,996 lbs. of wild resources in total. Of the total harvest reported, 78% was fish (251 lbs. per person, most of which was salmon (68% of the total reported harvest, which is an average of 221 lbs. per person. Large land mammals made up 14% of the total reported harvest at an average of 46 lbs. per person.

For birds and eggs, 45 households (44% of the sample reported using ptarmigan; 36 households (36% of the sample said they attempted to harvest birds and eggs; 3 households (3% of the sample claimed they received birds and eggs from others; and 2 households (2 % of the sample reported giving them to others.

When asked about the harvest of birds in general, residents of Sand Point said they used to harvest birds more frequently, but now it is a “whole lotta work” to hunt and pluck them and that the “best gift is an already plucked bird” (Reedy 2021: 43).

Ptarmigan were used by 10 participating households (9% of the sample). Eleven households (11% of the sample) reported attempting to harvest ptarmigan; 2 reported receiving ptarmigan; and 1 reported sharing their harvest of ptarmigan with others (ADF&G 2021b). The total reported harvest of ptarmigan was 52.36 lbs., which is an average of 0.2 lbs. per person. It is estimated that the total harvest of ptarmigan by all Sand Point residents was 99 lbs. In terms of resource sharing, 11 households (11% of the sample) said that they gave ptarmigan to others and 8 households (8% of the sample) claimed they received them. In a 2020 survey, residents said there were hardly any ptarmigan in the years preceding the survey and no harvest and use locations were noted on the maps provided (Reedy 2001). Residents harvested the majority of ptarmigan on Popof Island (where Sand Point is located) and on nearby Unga Island (Reedy 2021). Residents traveled further to harvest terrestrial mammals and saltwater fish than birds and eggs (Reedy 2021).

### **Effects of the Proposal**

If this proposal is adopted, only the residents of Cold Bay, King Cove, Nelson Lagoon, and Sand Point would have customary and traditional use for ptarmigan in Unit 9D. Currently all rural residents may harvest ptarmigan in Unit 9D. Recognizing the customary and traditional use of ptarmigan by the communities of Unit 9D will restrict Federal harvest opportunities for other rural residents. However, most hunters prefer to pursue opportunities for the harvest of resources close to home, so this is not seen as a hardship.

### **OSM PRELIMINARY CONCLUSION**

**Support Proposal WP22-37 with modification** to recognize the customary and traditional use of ptarmigan by residents of Unit 9D.

The modified regulation should read:

#### **Customary and Traditional Use Determination— Ptarmigan**

*Unit 9D*

~~*All rural residents.*~~ *Residents of Unit 9D*

### **Justification**

The Board has already recognized the customary and traditional uses for terrestrial animals and fishes in Unit 9D by the communities of Cold Bay, King Cove, Nelson Lagoon, and Sand Point. Based on these previous determinations, the communities of Unit 9D have already established a recognized pattern of harvest and use of wild resources in their area consistent with the eight factors. In addition, each

community has demonstrated use of ptarmigan as well as demonstrated patterns of harvesting resources close to home. Finally, recognizing customary and traditional use for all residents of Unit 9D, rather than just those with permanent settlements in this analysis, will account for changes in settlement patterns within the unit.

## LITERATURE CITED

ACCED. 2021. Alaska community database online: <https://dcra-cdo-dcced.opendata.arcgis.com/>. Retrieved: June 13, 2021.

ADF&G. 2021a. Cold Bay: 2016. Retrieved from <http://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=commInfo.Summary&CommID=122&Year=2014>

ADF&G. 2021b. King Cove: 2016. <http://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=harvInfo.harvest>. Retrieved: July 14, 2021

ADF&G. 2021c. Nelson Lagoon: 1987. <http://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=harvInfo.harvest>. Retrieved: July 14, 2021

ADF&G. 2021d. Sand Point: 2016. <http://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=harvInfo.harvest>. Retrieved: July 14, 2021

Clark, D.W. 1984. Pacific Eskimo: Historical Ethnography. Pages 185-197 in W. Sturtevant, ed. Handbook of North American Indians. Vol. 5, Arctic. Smithsonian Institution, Washington DC.

McCartney, A. 1984. Prehistory of the Aleutian Region. Pages 119-135 in W. Sturtevant, ed. Handbook of North American Indians. Vol. 5, Arctic. Smithsonian Institution, Washington D.C.

Merizon, R.A. and C.J. Carroll. 2021. Status of grouse, ptarmigan, and hare in Alaska, 2019 and 2020. ADF&G Division of Wildlife Conservation. Wildlife Management Report ADF&G/DWC/WMR-2019-2. Juneau, AK

Merizon, R.A. and C.J. Carroll. 2019. Status of grouse, ptarmigan, and hare in Alaska, 2017 and 2018. ADF&G Division of Wildlife Conservation. Wildlife Management Report ADF&G/DWC/WMR-2019-2. Juneau, AK

Merizon, R.A. and C.J. Carroll. 2017. Status of grouse, ptarmigan, and hare in Alaska, 2015 and 2016. ADF&G Division of Wildlife Conservation. Wildlife Management Report ADF&G/DWC/WMR-2019-2. Juneau, AK

Morseth, M. 2003. Puyulek Pu'irtuq! The People of the Volcanoes: Aniakchak National Monument and Preserve Ethnographic Overview and Assessment. National Park Service. Anchorage, Alaska. ISBN: 0941555054.

Partnow, P.H. 2001. Making History: Alutiiq/Sugpiaq Life on the Alaska Peninsula. University of Alaska Press. Fairbanks, Alaska. 207 pp.

Reedy, K. 2021 (draft). Western Gulf of Alaska Salmon and Other Harvests on Federal Lands and Waters. Fisheries Resource Monitoring Program. 16-452. USFWS Office of Subsistence Management, Anchorage, Alaska.

Reedy, K. 2016a. Island Networks: Aleutian Island salmon and other subsistence harvests. Fisheries Resource Monitoring program, 12-450. USFWS, Office of Subsistence Management, Alaska Region, Anchorage, AK. 140 pp.

Reedy-Maschner, K.L. and H.D.G. Maschner. 2012. *Subsistence Study for the North Aleutian Basin. OCS Study BOEM 2012-109*. U.S. Dept. of the Interior, Bureau of Ocean Energy Management, Alaska Region: Anchorage. <http://www.boem.gov/BOEM-Newsroom/Library/Publications/2012/BOEM-2012-109.aspx>

VanStone, J.W. 1984. Mainland Southwest Alaska Eskimo. Pages 224-242 in W. Sturtevant, ed. *Handbook of North American Indians*. Vol. 5, Arctic. Smithsonian Institution, Washington DC.

<b>WP22-38a Executive Summary</b>	
<b>General Description</b>	Proposal WP22-38a requests that the Federal Subsistence Board recognize the customary and traditional use of caribou in Unit 10 Unimak Island for residents of Cold Bay and Nelson Lagoon. <i>Submitted by: Kodiak/Aleutians Subsistence Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<b>Customary and Traditional Use Determination--Caribou</b>  <i>Unit 10 Residents of Akutan, <b>Cold Bay</b>, False Pass, King Cove, Nelson Unimak Island <b>Lagoon</b>, and Sand Point</i>
<b>OSM Preliminary Conclusion</b>	<b>Support</b> Proposal WP22-38a <b>with modification</b> to recognize the customary and traditional use of caribou by residents of Unit 9D.  The modified regulation should read:  <b>Customary and Traditional Use Determination—Caribou</b>  <i>Unit 10 Unimak Island Residents of Akutan, False Pass, <b>and Unit 9D</b> King Cove, and Sand Point.</i>
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	None

**DRAFT STAFF ANALYSIS  
WP22-38A**

**ISSUES**

Wildlife Proposal WP22-38a, submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council (Council), requests a customary and traditional use determination for caribou in Unit 10 Unimak Island for residents of Cold Bay and Nelson Lagoon.

**DISCUSSION**

During their winter 2021 meeting on March 10, the Council discussed their growing concern for the Unimak Caribou Herd. Regional wildlife biologists informed the Council that the herd has reached its population threshold on Unimak Island. The attending Federal and State wildlife biologists agreed that more harvest is needed to maintain a healthy population. The current hunt on Unimak Island is open to the taking of caribou by residents of False Pass only. The Council requests to add Cold Bay and Nelson Lagoon to the existing customary and traditional use determination for caribou in Unit 10 Unimak Island. Rescinding the closure is addressed in related proposal, WP22-38b.

Note: Wildlife Proposal WP22-38b, also submitted by the Council, requests closure of Federal public lands in Unit 10, Unimak Island only, to caribou hunting, except by Federally qualified subsistence users unless the caribou population estimate exceeds a population threshold.

**Existing Federal Regulation**

**Customary and Traditional Use Determination—Caribou**

<i>Unit 10 Unimak Island</i>	<i>Residents of Akutan, False Pass, King Cove, and Sand Point.</i>
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**Proposed Federal Regulation**

**Customary and Traditional Use Determination—Caribou**

<i>Unit 10 Unimak Island</i>	<i>Residents of Akutan, <b>Cold Bay</b>, False Pass, King Cove, <b>Nelson Lagoon</b>, and Sand Point.</i>
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**Extent of Federal Public Lands**

Federal public lands comprise approximately 90% of Unit 10 (Unimak Island) and consist of 100% U.S. Fish and Wildlife Service (USFWS) managed lands (**Map 1**). Unimak Island is located within the Alaska Maritime National Wildlife Refuge and is managed by Izembek National Wildlife Refuge (Izembek NWR).



## Regulatory History

In 1990, the Federal Subsistence Board (Board) assumed subsistence management responsibilities on Federal public lands and adopted existing State customary and traditional use determinations. At that time, False Pass was the only community with a customary and traditional use determination for caribou in the Unimak Island portion of Unit 10 (57 Fed. Reg. 22959; May 29, 1992).

In 1998, the Council requested customary and traditional use determination for caribou in the Unimak Island portion of Unit 10 for residents of Cold Bay, King Cove, Sand Point, and Nelson Lagoon. The Board followed the Council's recommendation to adopt this proposal, Proposal P98-44, with modification to only add residents of King Cove and Sand Point to the customary and traditional use determination for Unimak Island caribou (OSM 2021). Justification for the modification stated that neither Cold Bay nor Nelson Lagoon demonstrate a long-term use of the Unimak Island caribou. Most residents of both communities did not harvest on Unimak Island because they preferred land-based access to caribou on the western Alaskan Peninsula. Residents of King Cove and Sand Point, on the other hand, commonly used boats to access herds on Unimak Island (OSM 2021). At the time, the Board considered Proposal P98-44, directions for making customary and traditional use determinations stated that communities must exhibit each of the eight factors of customary and traditional use. The directions read:

A community or area must generally exhibit the following eight factors, which exemplify customary and traditional use (FR 50 CFR Part 100 B.16[b]). The Federal Subsistence Board will make customary and traditional use determinations based on an application of these eight factors, as described in FR 50 CFR Part 100 B.16[b]. In addition, the Federal Subsistence Board will take into consideration the reports and recommendations of any appropriate regional council regarding customary and traditional use of subsistence resources (FR 50 CFR Part 100 B.16[c], OSM 2021).

In 2000, the Board considered Proposal P00-28, submitted by the Council, requesting residents of Akutan be added to the customary and traditional use determination for caribou in Units 9D and 10 (Unimak Island). The Board adopted Proposal P00-28 based on information that demonstrated residents of Akutan traveled to Unimak Island to hunt caribou (65 Fed. Reg. 40735; June 30, 2000).

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process and present recommendations for regulatory changes. At its fall 2013 meeting, the Southcentral Alaska Subsistence Regional Advisory Council made a recommendation to “change the way such determinations are made by making area-wide customary and traditional use determinations for all species,” and supported other Regional Advisory Councils when choosing a process that works best in their regions (SCSRAC 2013:107–110). In June 2016, the Board clarified that the eight-factor analysis applied when considering customary and traditional use determinations is intended to protect subsistence use rather than limit it. The Board stated that the goal of the customary and traditional use determination analysis process is to recognize customary and traditional uses in the most inclusive manner possible.

## **Community Characteristics** (The information from this section is repeated from WP22-37)

The archeological record indicates that there have been human populations in the western end of the Alaska Peninsula for at least 9,000 years (Reedy, in print 2021). Two Alaska indigenous groups, Unangan and Alutiiq, are known to have historically inhabited and hunted in Unit 9D. Euro western explorers, missionaries, and entrepreneurs started residing in the region by the 1700s. Russian traders and explorers travelled to the Aleutian Islands and up the Alaska coast in the mid-eighteenth century (McCartney 1984; Clark 1984). Russia claimed sovereignty over Alaska for 126-years, providing opportunities for Russian and other European explorers to settle and search for commercial resources including sea-otter pelts (McCartney 1984, Partnow 2001, Morseth 2003). Intermarriages between indigenous people, Russians, and others of European heritage took place as both Russian and Europeans settled into indigenous territories (Partnow 2001). The influx of immigrants from Europe and the United States to the Alaska Peninsula increased after Russia sold Alaska to the United States in 1867 (Morseth 2003).

### Cold Bay

Cold Bay is situated on the farthest western extent of the Alaskan Peninsula, approximately 634 miles southwest of Anchorage. It is the site of the former World War II air base of Fort Randall and the current headquarters of the Izembek National Wildlife Refuge. In 2020, the US Census estimated the Cold Bay population to be 76, down 22 persons from the last census in 2010. Despite its small population size, it has one of the largest runways in the state and serves as regional a transportation hub.

### Nelson Lagoon

Nelson Lagoon is the smallest community in Unit 9D and the only one located on the north side of the Alaska Peninsula. Nelson Lagoon was a seasonal fish camp, and then the location of a salmon saltery between 1906 and 1923. Nelson Lagoon became a permanent community with the opening of a school in 1965. The area supports a commercial fishery with most operations based out of the seasonally occupied Port Moller, which is across the lagoon. In 2020, the U.S. Census estimated the Nelson Lagoon population to be 32, down 18 persons from the last census in 2010.

## **Eight Factors for Determining Customary and Traditional Use**

A community or area's customary and traditional use is generally exemplified through the eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances,

where appropriate; (6) a pattern of use that includes handing down knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use that relates to reliance upon a wide diversity of fish and wildlife resources of the area and provides substantial cultural, economic, social, and nutritional elements to the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit some or all the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

### Cold Bay

The Board has recognized Cold Bay's customary and traditional uses of brown bear in Units 9D and 10 (Unimak Island) and caribou, moose, and wolf in Unit 9D.

Many residents of Cold Bay harvest wild food resources (the following paragraph is repeated from WP22-27; new information on resource harvesting is in the next paragraphs). In a 2016 ADF&G (2021a) comprehensive subsistence harvesting study, 23 out of an estimated 32 households were surveyed in Cold Bay, covering 45 out of an estimated 63 residents. All households surveyed reported that they used subsistence resources. An average of 232 lbs. of wild resources were harvested per person surveyed. Approximately 72% (168 lbs. per person) of the harvest was fish, most of which was salmon (64% of the total harvest). Large land mammals made up 13% of the harvest at 30 lbs. per person. Birds and eggs made up about 7% of the harvest at 17 lbs. per person. In addition to household consumption, most households also participate in resource sharing and other forms of redistribution. Twenty-two households (96% of the survey sample) reported receiving resources shared by others, and 20 households (87%) reported sharing resources with others.

Unimak Island caribou was closed to hunting during the 2016 survey year, but residents were able to harvest caribou elsewhere. Eleven of the surveyed households (48% of the sample) reported using caribou, seven households (30% of the sample) reported attempting to harvest caribou, nine households (39% of the sample) reported receiving caribou, and six households (26% of the sample) reported sharing their harvest of caribou with others (ADF&G 2021a). The households surveyed reported a total harvest of 910 lbs. of caribou, which is an average of 20.2 lbs. per person (ADF&G 2021a). It is estimated that the total harvest for the community was 1266 lbs. In a recent study conducted by Reedy (2021), residents of Cold Bay claimed that they were not getting enough caribou for their needs. They explained that caribou were not coming as close to the community and harvesting sites as before. One resident said that this change in behavior was caused by less annual snow in the area, explaining that caribou "won't

come down without snow”. Another resident blamed air traffic and predation on changes in caribou behaviors. Reedy noted:

One concern mentioned was that the U.S. Coast Guard fly grids and scare the animals. They now hang out in the mountains more in the summer than before. Caribou numbers in general were thought to be decreasing in the Cold Bay region. There were “thousands in the 90s, just walking down the road.” There have been efforts to control the wolf population on the peninsula and some residents felt it was starting to help the caribou (Reedy 2021:90).

Residents of Cold Bay harvest caribou locally. Harvest and use location for caribou was identified on the west side of the Mortensen’s Lagoon watershed (Reedy 2021). Other harvest and use locations for both Cold Bay and King Cove included the mountain flanks on the eastern coast of Cold Bay and a large area north west of Pavlov Bay (Reedy 2021: 75). As mentioned above, the Unimak Island hunt was closed during the survey year.

### Nelson Lagoon

The Board has recognized Nelson Lagoon’s customary and traditional uses of brown bear, caribou, moose, and wolf in Unit 9D.

Wild resources have been important to residents of Nelson Lagoon residents (the following paragraph is repeated from WP22-27; new information on resource harvesting is in the next paragraphs). In a 2009 comprehensive household subsistence survey, Reedy-Maschner and Maschner (2012) interviewed 22 out of an estimated 24 occupied households. Survey participants reported harvesting a total of 13,613 lbs of food, which averages 261 lbs per person. It is estimated that the whole community harvests 14,851 lbs of wild foods. The composition of the reported community harvest was 10,694 lbs of salmon (72% of total harvest), 1,460 lbs of plants (10% of total harvest), 954 lbs of land mammals (6% of total harvest), 882 lbs of non-salmon fish (6% of total harvest), 680 lbs of birds and eggs (5% of total harvest), and 181 lbs of shellfish (1% of total harvest). Resource sharing, or redistribution, has been important to Nelson Lagoon residents. Based on the interviews with participants in 2009, it is estimated that 2,889 pounds (or 18% of all wild food consumed) were received from others (Reedy-Maschner and Maschner, 2012). In a 1987 ADF&G (2021b) comprehensive household subsistence survey, all 13 households surveyed out of an estimated 18 total households claimed they both gave wild resources to others and received.

There was a dramatic decline in the number of caribou harvested between 1987 and 2009. In 2009, which was the year of the most recent household subsistence survey, none of the households surveyed reported harvesting caribou (Reedy-Maschner and Maschner 2012). In comparison, 12 of the 13 participating households (92% of the sample) claimed that they harvested caribou in 1987 (ADF&G 2021b). Residents reported a community harvest of 38 caribou, which is an average of 119 pounds per person. It is estimated that the community harvested a total of 53 caribou. Regulatory changes since 1987 are one of the main causes for the reduction in caribou harvest leading into 2009 (Reedy-Maschner and Maschner 2012). Reedy-Maschner and Maschner (2012: 55) note that one resident explained, “the caribou ban

really put a hurt on us.” Others believe that the main reason for the decline in caribou is because of an overabundance of wolves (Reedy-Maschner and Maschner 2012).

When they had caribou, residents of Nelson Lagoon redistributed the resource with others. In 1987, nine households (69% of the sample) said they attempted to harvest caribou, 10 households (77% of the sample) reported they received caribou from others, and about 38% of households shared caribou with others (ADF&Gb).

There is no information on harvesting locations for Nelson Lagoon residents.

### **Effects of the Proposal**

If this proposal is adopted, the residents of Cold Bay and Nelson Lagoon will have customary and traditional use for caribou in Unit 10 Unimak Island. Currently residents of Akutan, False Pass, King Cove, and Sand Point have customary and traditional use of caribou in Unit 10 Unimak Island; however, the harvest of caribou on Unimak Island is currently closed to all but residents of False Pass. If the closure was modified as requested by Proposal WP22-38b, and Federal public lands in Unit 10 Unimak Island were closed to the hunting of caribou except by Federally qualified subsistence users, Cold Bay and Nelson Lagoon would have an opportunity to participate in the hunt.

### **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP22-38a **with modification** to recognize the customary and traditional use of caribou by residents of Unit 9D.

The modified regulation should read:

#### **Customary and Traditional Use Determination—Caribou**

*Unit 10 Unimak Island*

*Residents of Akutan, False Pass, **and Unit 9D** ~~King Cove, and Sand Point.~~*

### **Justification**

Residents of the communities of Cold Bay and Nelson Lagoon already have a customary and traditional use determination for caribou and brown bear in Unit 9D, as well as a customary and traditional use determination for brown bear in Unit 10. Both communities have patterns of use of caribou and local subsistence resources in Units 9D and 10 consistent with the eight factors outlined in this analysis. Recognizing customary and traditional use for all residents of Unit 9D, rather than just those with permanent settlements in this analysis (Cold Bay, King Cove, Nelson Lagoon, and Sand Point), will account for changes in settlement patterns within the unit and simplify regulations.

## LITERATURE CITED

ACCED. 2021. Alaska community database online: <https://dcra-cdo-dcced.opendata.arcgis.com/>. Retrieved: June 13, 2021.

ADF&G. 2021a. Cold Bay: 2016. <http://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=commInfo.Summary&CommID=122&Year=2014>. Retrieved: July 14, 2021

ADF&G. 2021b. Nelson Lagoon: 1987. <http://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=harvInfo.harvest>. Retrieved: July 14, 2021

Clark, D.W. 1984. Pacific Eskimo: historical ethnography. Pages 185-197 in W. Sturtevant, ed. Handbook of North American Indians. Vol. 5, Arctic. Smithsonian Institution, Washington DC.

McCartney, A. 1984. Prehistory of the Aleutian Region. Pages 119-135 in W. Sturtevant, ed. Handbook of North American Indians. Vol. 5, Arctic. Smithsonian Institution, Washington D.C.

Morseth, M. 2003. Puyulek pu'irtuq! The people of the volcanoes: Aniakchak National Monument and Preserve Ethnographic Overview and Assessment. National Park Service. Anchorage, Alaska. ISBN: 0941555054.

OSM. 2021. Staff analysis P98-44. Alaska Federal Subsistence Program, subsistence database. <https://subsistence.fws.gov/apex/f?p=MENU:101:::> Retrieved: June 1, 2021.

Partnow, P.H. 2001. Making History: Alutiiq/Sugpiaq life on the Alaska Peninsula. University of Alaska Press. Fairbanks, Alaska. 207 pp.

Reedy, K. 2021 (draft). Western gulf of Alaska salmon and other harvests on Federal lands and waters. Fisheries Resource Monitoring Program. 16-452. USFWS Office of Subsistence Management, Anchorage, Alaska.

Reedy, K. 2016a. Island networks: Aleutian Island salmon and other subsistence harvests. Fisheries Resource Monitoring program, 12-450. USFWS, Office of Subsistence Management, Alaska Region, Anchorage, AK. 140 pp.

Reedy-Maschner, K.L. and H.D.G. Maschner. 2012. Subsistence study for the North Aleutian Basin. OCS Study BOEM 2012-109. U.S. Dept. of the Interior, Bureau of Ocean Energy Management, Alaska Region: Anchorage. <http://www.boem.gov/BOEM-Newsroom/Library/Publications/2012/BOEM-2012-109.aspx>

SCSRAC, 2013. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings. November 5, 2013. Office of Subsistence Management, USFWS. Anchorage, AK.

<b>WP22–38b Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP22-38b requests closure of Federal public lands in Unit 10, Unimak Island only to caribou hunting except by Federally qualified subsistence users unless the caribou population estimate exceeds a population threshold. <i>Submitted by: Kodiak/Aleutians Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Unit 10—Caribou</b></p> <p><i>Unit 10, Unimak Island only—1 bull by Aug. 1-Sep. 30 Federal registration permit.</i></p> <p><i>Federal public lands are closed to the taking of caribou except by <del>residents of False Pass</del> Federally qualified subsistence users unless the population estimate exceeds (a threshold to be recommended by State and Federal management).</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b> Proposal WP22-38B <b>with modification</b> to establish a population threshold of 800 caribou.
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	None

**DRAFT STAFF ANALYSIS  
WP22-38B**

**ISSUES**

Wildlife Proposal WP22-38b, submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council (Council), requests closure of Federal public lands in Unit 10, Unimak Island only to caribou hunting except by Federally qualified subsistence users unless the caribou population estimate exceeds a population threshold.

**DISCUSSION**

The proponent states that the Unimak Caribou Herd (UCH) has reached its population threshold, and that Federal and State wildlife biologists agree more harvest is necessary to maintain a healthy population.

The proposal as submitted also requested, “An annual harvest quota for the hunt to be established by Delegated Official in consultation with the State of Alaska as outline in the letter of delegation.” As the in-season manager already can set annual harvest quotas via a delegation of authority (**Appendix 1**), this part of the proposal is not considered further.

WP22-38a requests that Cold Bay and Nelson Lagoon be added to the customary and traditional use determination for caribou in Unit 10, Unimak Island.

**Existing Federal Regulation**

**Unit 10—Caribou**

*Unit 10, Unimak Island only—1 bull by Federal registration permit. Aug. 1-Sep. 30.*

*Federal public lands are closed to the taking of caribou except by residents of False Pass*

**Proposed Federal Regulation**

**Unit 10—Caribou**

*Unit 10, Unimak Island only—1 bull by Federal registration permit.*

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**Existing State Regulation**

**Unit 10–Caribou**

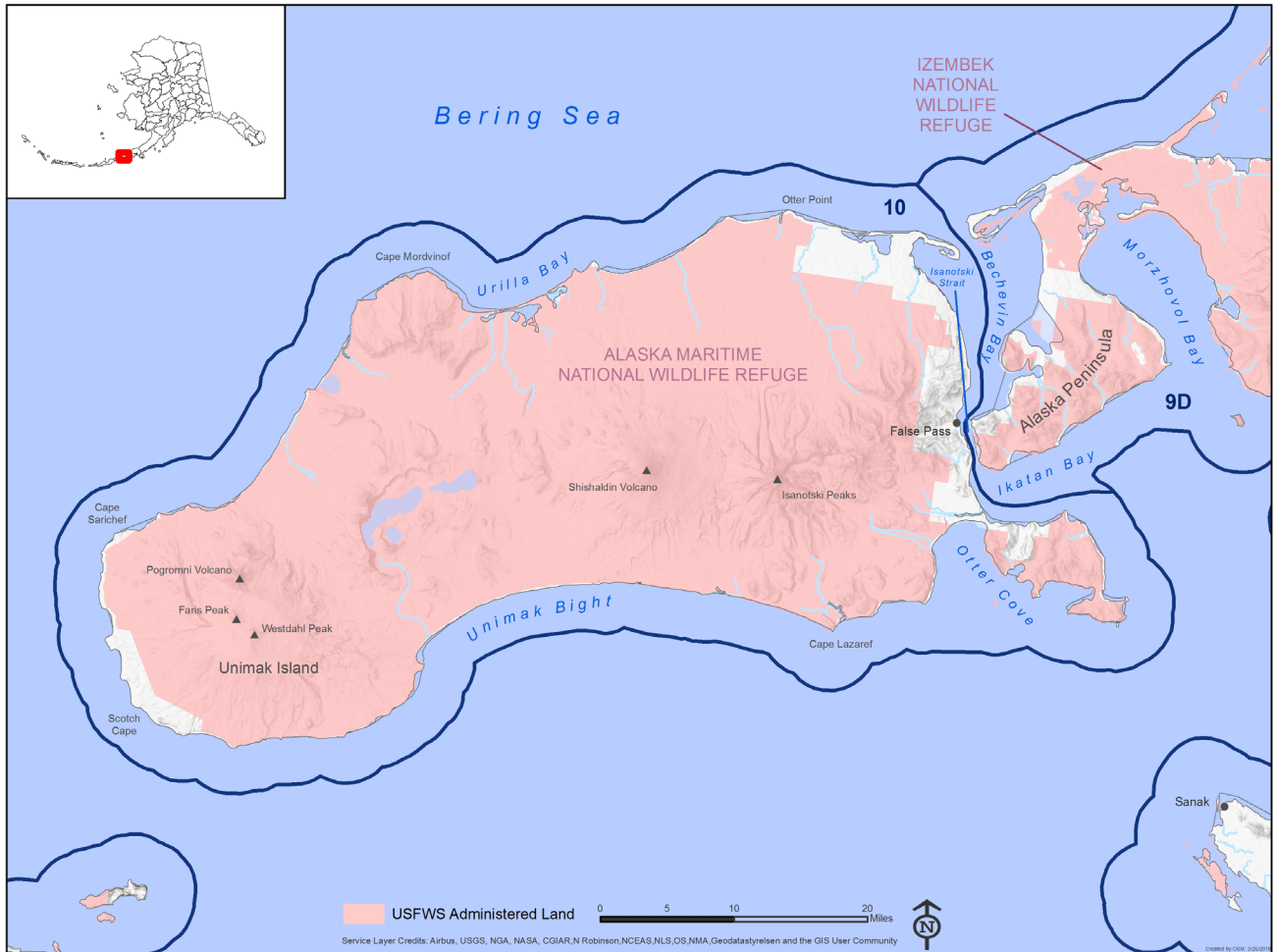
*Umnak and Unimak islands*

*Residents and Nonresidents*

*No open season*

**Extent of Federal Public Lands/Waters**

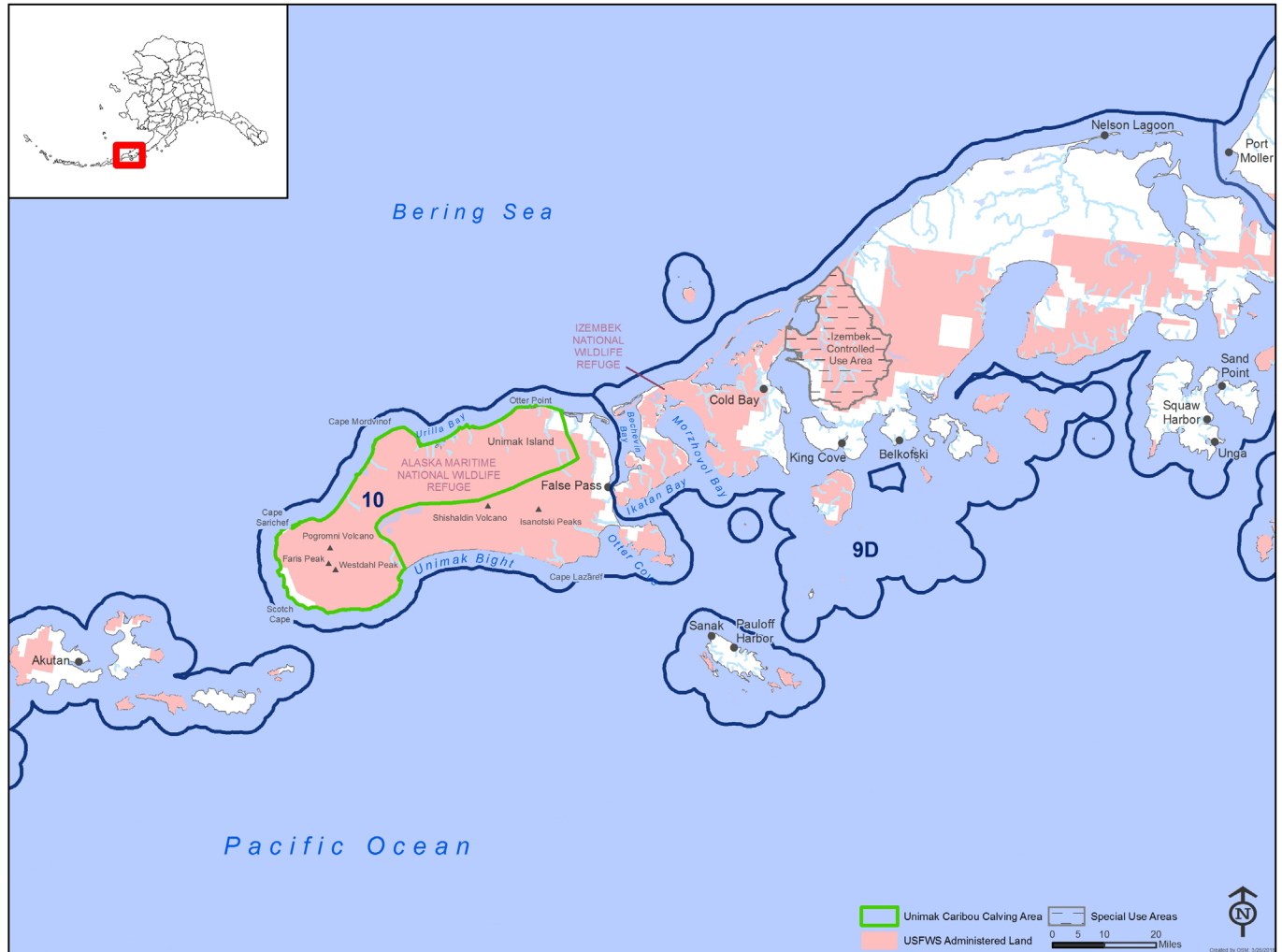
Federal public lands comprise approximately 90% of Unit 10 (Unimak Island) and consist of 100% U.S. Fish and Wildlife Service (USFWS) managed lands (**Map 1**). Although Unimak Island is within the Alaska Maritime National Wildlife Refuge, it is managed by Izembek National Wildlife Refuge (Izembek NWR).



**Map 1.** Unimak Island

## Customary and Traditional Use Determinations

Residents of Akutan, False Pass, King Cove, and Sand Point have a customary and traditional use determination for caribou in Unit 10 (**Map 2**).



**Map 2.** Unimak Island including the communities with Customary and Traditional Use for caribou - Akutan, False Pass, King Cove, and Sand Point. The green outline depicts the Unimak Caribou herd's calving area.

## Regulatory History

Over the last three decades, regulations for harvesting Unit 10 caribou have responded to changes in UCH: they first became more conservative, then relaxed, and then became more conservative again. In the early 1990s, Federal management acted to halt the precipitous decline in the UCH population. In 1991, caribou harvest in Unit 10 (Unimak Island) was closed to non-Federally qualified subsistence users (P91-01) (OSM 1991). In 1993, the Alaska Department of Fish and Game (ADF&G) closed the State harvest by Emergency Order when the combined UCH and Southern Alaska Peninsula herd

(SAP) declined below 2,500 caribou; and the Federal Subsistence Board (Board) approved Temporary Special Action S93-01 to close Units 9D and 10 (Unimak Island) to all caribou harvest (OSM 1993).

In 1994, the Board adopted Proposal P94-28 to continue the closure for another three to five years to allow post-1990 calves to reach reproductive age and successfully reproduce (OSM 1994).

By the end of the 1990s, Federal management started to relax restrictions and allow more harvest. In 1997, the Board approved Temporary Special Action S97-01 to open a caribou season in Units 9D and 10 from Aug. 10-Mar. 31 after caribou surveys indicated there was a sufficient increase in bulls to allow for a subsistence harvest on Federal public lands (OSM 1997). Temporary Special Action S98-05 established a subsistence hunt via Federal registration permit (OSM 1998), while Temporary Special Action S99-04 authorized a caribou harvest of one caribou from Sep. 1-Mar. 31, 1999 (OSM 1999). In 2000, when the UCH reached 1,000 caribou, the Board adopted Proposal P00-029, establishing a two caribou harvest limit by Federal registration permit in Unit 10 during the fall season of Aug. 1-Sep. 30 and the winter season from Nov. 15- Mar. 31 (OSM 2000). The State general season was reopened in 2001 to allow residents to harvest one caribou from Aug. 10-30 or Nov. 15-Mar. 31 and nonresidents one caribou from Sep. 1-30 (Butler 2005).

In 2003, the Board approved Temporary Special Action WSA03-08, which increased the harvest limit from two to four caribou for Unit 10 (Unimak Island) during the fall season of Aug. 1-Sep. 30, 2003 (OSM 2003a). Temporary Special Action WSA03-10 was approved by the Board and extended the increased harvest limit of four caribou into the winter season from Nov. 15, 2003-Mar. 31, 2004 (OSM 2003b). In 2004, the Board adopted Wildlife Proposal WP04-40, increasing the harvest limit from two caribou to four caribou for Unit 10 (Unimak Island) (OSM 2004).

After a decade of relaxing restriction, Federal management again needed to respond to decreasing population levels. In 2008, the Board adopted Proposal WP08-25 (OSM 2008a), decreasing the harvest limit from four to two caribou for Unit 10 (Unimak Island) in response to a decrease in the UCH. In addition, in response to declining population numbers of the SAPCH, the Board also closed the Federal caribou season in Unit 9D in 2008 (WP08-26) (OSM 2008b).

The Alaska Board of Game (BOG) closed all hunting for caribou on Unimak Island (Unit 10) at its Feb. 27 – Mar. 9, 2009 meeting (State Proposal 54). The Board approved Emergency Special Action WSA09-06 on July 1, 2009, closing the fall caribou season from Aug. 1 through Sep. 29 (OSM 2009a) and authorized Temporary Special Action WSA09-07 on November 10, 2009 to close the winter season (OSM 2009b). In 2010, concern that the caribou population could be extirpated from Unimak Island due to the small population size, the BOG and the Board suspended all caribou hunting on Unimak Island, including subsistence hunting, for conservation reasons (WP10-42) (OSM 2010). From 2009-2017, there were no State or Federal caribou hunts on Unimak Island (Crowley 2015, Peterson 2018, pers. comm.).

In 2018, the Board approved Temporary Special Action WSA18-01, to open a limited fall caribou hunt for residents of False Pass only (OSM 2018). Three bull caribou were harvested under WSA18-01.

In 2019, the Council submitted another Temporary Special Action WSA19-05, requesting that Federal public lands in Unit 10, Unimak Island only, be opened for a limited bull caribou hunt from Aug. 15-Oct. 15, 2019 for the residents of False Pass only. The Board approved the request in July 2019. Izembek NWR offered 10 permits; of these three permits were issued and three caribou were harvested. (Fitzmorris 2020, pers. comm.; Melendez 2021, pers. Comm.).

In 2020, the Council submitted Proposal WP20-25, requesting that Federal public lands in Unit 10, Unimak Island only, be opened for a limited bull caribou hunt by Federal registration permit from Aug. 15-Oct. 15 for the residents of False Pass only, and that the Izembek NWR Manager be allowed to determine the annual harvest quota. The Board adopted Proposal WP20-25 with modification to open a caribou season from Aug. 1-Sept. 30 and to delegate authority to the Izembek NWR manager to set the harvest quota, close the season, and set permit conditions via a delegation of authority letter. Establishing a season provided subsistence opportunity for False Pass residents as the UCH had recovered to a level allowing for limited harvest. The Council recommended the earlier season to reduce the potential of disturbing caribou during the rut in October. Delegating authority to a Federal manager provides for in-season management flexibility and timely responses to changing conditions. In 2020, 15 permits were allocated, but only one permit was issued and no caribou harvested (Melendez 2021, pers. Comm.).

### **Biological Background**

Research has demonstrated that the UCH are a distinct subpopulation of caribou. Originally, caribou on Unimak Island (Unit 10) and the SAPCH (Unit 9D) were managed as a single population. However, subsequent genetic sampling of the UCH and SAPCH showed enough distinction to classify them as two different herds (Zittlau 2004). Although caribou have been documented to cross Isanotksi Straight, a half-mile passage that has strong tidal currents located between Unimak Island and the Alaska Peninsula (**Map 2**) (Skoog 1968, Sellers 1999, Valkenburg et al. 2003), no significant dispersal, based on collared cows, between the UCH and the SAPCH was documented from 2000-2011 (Butler 2009, Peterson 2013). In 2012, one collared cow swam across Isanotski Strait from Unimak Island to the mainland and was seen in the vicinity of 5-30 other caribou. Given that the nearest collared cow from the SAPCH was 40 miles away, it is possible that this cow was accompanied by 5-30 other caribou when she crossed from Unimak Island (Crowley 2015). In a genetic study on North American caribou herds, Zittlau (2004) found the UCH to be closely related to the Southern and Northern Peninsula caribou herds on the Alaska Peninsula, but quite distinct from all other herds. Zittlau's (2004) findings are consistent with the hypothesis that Unimak caribou derived from the SAPCH, but were subsequently isolated (Talbot 2018, pers. comm.) and thus emigration and immigration has not been a routine component of UCH population dynamics (USFWS 2010).

Managers have since acknowledged the status of the UCH as a subpopulation. In 2007, ADF&G revised the Draft Southern Alaska Peninsula Caribou Herd Operational Plan to reflect the separation of the SAPCH and the UCH (ADF&G and USFWS 2007). To date, no formal management objectives have been defined by ADF&G for the UCH due to the difficult logistics in accessing the island. General ADF&G management objectives are to keep the Unimak Herd at 1,000 to 1,500 animals with

a fall bull:cow ratio of 35 bulls:100 cows based on limited habitat on the island (ADF&G and USFWS 2007). However, Crowley (2020) proposed a population objective range of 800-1,000 caribou given the 2002 peak of 1,200 caribou and subsequent decline.

The UCH population size has varied considerably over the last century. (Valkenburg et al. 2003, Colson et al. 2014, Crowley 2015). Population estimates based on ground observations, expert opinion, reports by Unimak residents, Murie (1959), and Beals and Longworth (1941) estimated 7,000 caribou in 1925 and 3,000 to 8,000 caribou in 1941. Although Skoog (1968) reported no caribou in 1949 and 1953 while conducting aerial surveys, it is unknown if these results represent total absence, very low density, and/or incomplete coverage of the island, lack of information on sightability conditions, and/or extent of the surveys. Skoog (1968) subsequently reported 1,000 caribou in 1960; assuming the survey methods were comparable, his observations would indicate that UCH underwent large fluctuations in seven years. The UCH reached a peak in 1975 with an estimated population of 3,334 animals (Irvine 1976) and then decreased to 300 animals by the early 1980s. The severe winter of 1975-1976 likely contributed to the declines in the early 1980s (Crowley 2015).

Surveys since the 1980s also suggest the herd size varies. Izembek NWR has conducted seven aerial surveys on-systematic transects across Unimak Island since 1996/97 when snow on the ground facilitated observation (**Table 1**). Although, some caribou may be missed or counted twice during these flights, the counts provide estimates of minimum population sizes. The UCH population size was approximately 600 animals in 1997 and 1,262 by 2002. The UCH population remained relatively stable at around 1,000 animals until 2005 and then declined to 192 caribou in 2013. In 2016, the UCH increased to approximately 330 animals (KARAC 2017, 2018, Crowley 2016). Biologists counted a minimum of 181, 190 and 287 caribou during parturition surveys in 2016, 2017 and 2018, respectively (ADF&G 2017, 2019; Fitzmorris, 2019). The 413 caribou observed in 2018 during the composition surveys was thought to be representative of a herd between 400-500 animals (Fitzmorris 2019, KARAC 2019).

Recent research suggests that bull numbers have been relatively low in the UCH. Since 2000, ADF&G has conducted yearly composition counts during autumn (early to mid-October). From 2000-2005, bull:cow ratios were above the management objectives (35 bulls:100 cows) set for most caribou herds in Alaska (Peterson 2013). In 2005, caribou population composition surveys (**Table 1**) estimated 730 caribou with a ratio of 45 bulls:100 cows, with large bulls making up 39% of all bulls. The 2008 estimate of 9 bulls:100 cows was a significant decrease from the 2007 estimate of 31 bulls:100 cows (Butler 2008) and represented a 71% decrease in the bull:cow ratio. The bull:cow ratio continued to decline to 5 bulls:100 cows in 2009 (Riley 2011). In 2016, the bull:cow ratio increased significantly to 33 bulls:100 cows, which is close to the recommended fall bull:cow ratio of 35 bulls: 100 cows (Crowley 2016). Caribou have a polygynous mating system in which a single male is capable of breeding with many females; however, research has shown that there is a sex-ratio threshold for caribou (sex ratio  $\leq 0.08$ ; males  $\leq 8\%$  of the population), below which fecundity may collapse (Bergerud 1974). The mean annual bull:cow ratio from 2008-2018 was 12 bulls: 100 cows (**Table 1**).

The low bull numbers can be explained, in part, by an aging population structure because of reduced recruitment. After several years with poor recruitment into a caribou population, the remaining animals become older, on average, and the number of males usually declines before the females due to higher annual mortality rates, especially after 5-6 years of age (Bergerud 1980). Thus, as the population declines, older individuals and cows make up a larger proportion of the population which may explain the continued decline of bull:cow ratios in the UCH. The low number of bulls may also result in some cows going unmated, which would further depress pregnancy rates and ultimately, recruitment and herd growth. For example, pregnancy rates for cows two years or older decreased from 85% in 2008 (n=113) (Butler 2009) to 68% in 2009 (n=40) and 69% in 2018 (Riley 2011, ADF&G 2019b).

In addition to the effects of the aging population structure and emigration, predation and hunting mortality may have contributed to the decline in the bull:cow ratio from 2006 to 2014. Bull only seasons have the potential to increase bull mortality from caribou populations (Bergerud 1974). In the presence of natural wolf and bear populations, the generalized maximum sustainable harvest mortality is three percent annually (Bergerud 1980). Conservative caribou management guidelines for small populations or populations in decline call for no bull harvest or a small bull harvest of 1% of the total population (Environment Yukon 2016). Previous Federal and State hunting seasons ended on September 30 to protect the bulls during the rut and were closed from 1993-1996 and 2009 to 2017. The UCH population continued to decline from 2006-2014, even though the reported harvest remained below the 3% guideline from 2001-2008 and included no legal harvest from 2009-2014.

In 2016, the ratio of 40 calves:100 cows was significantly greater than in previous surveys from 2005-2012 when the average was 6 calves:100 cows (**Table 1**). Maintenance of a stable population generally requires an average fall recruitment ratio of 20-25 calves:100 cows. Fall calf:cow ratios are typically a good indicator of the number of calves entering the herd as adults as most mortality occurs within the first few months of life. Calf recruitment from 2005-2012 was not sufficient to offset adult mortality and helps to explain the overall decreasing population trend for the UCH during this time. Limited movements of caribou to and from the Southern Alaska Peninsula and the high fidelity of the UCH to calving grounds suggests that the decline was not due to caribou from the UCH migrating to the mainland. In addition, immigration from the SAPCH was less likely from 2002-2008 because the annual SAPCH calf recruitment was also at its lowest levels (6 calves:100 cows) (Butler 2007).

Other specific limiting factors, such as poor nutrition, predation, weather events, disease, and parasites, that may have contributed to the low calf recruitment from 2003-2013 and subsequent population decline are not known (Keech and Valkenburg 2007). Valkenburg et al. (2003) stated that, typically, predation is a limiting factor to caribou populations, particularly in small isolated herds. In 1999, Sellers et al. (2003) conducted a study on the SAPCH and found that wolves and bears were responsible for most of the calf mortality that occurred during the summer after the neonate stage. Sellers et al. (2003) noted that predation by brown bears was well below levels found in interior Alaska despite the high density of brown bears in the SAPCH area. This was different from the results of a study in Denali National Park, where brown bears were opportunistic predators of caribou, particularly

neonate calves (Adams et al. 1995). Only one wolf was sighted during the 2016 surveys on Unimak Island (KARAC 2017, 2018).

Data is not available on weather patterns, for example severe winter storms or icing events that may have contributed to the population declines in the UCH. Valkenburg et al. (2003) noted that in 1998, many of the calves handled in the range of the SAPCH had incisors worn to the gum line which may have been due to volcanic ash. Despite this these calves were in relatively good condition. It is unlikely that the high rate of calf mortality in the UCH since 2005 was due primarily to stochastic events such as icing and volcanic eruptions, although these events may have contributed.

In summary, indirect evidence suggests that multiple factors likely contributed to the decline of the UCH. From 2002 to 2013, the UCH population declined by approximately 85% with bulls declining by about 97% (**Table 1**). Limited calf recruitment is thought to be the primary cause of the decline in the UCH population. As of 2018, the UCH population is growing slowly and the current bull:cow and calf:cow ratios are above the State management objectives.

**Table1.** Unimak Caribou Herd winter minimum population counts and fall composition counts in Unit 10 from 1996–2020 (Butler 2005, 2007, Crowley 2015, 2016; USFWS 2018a, 2018b, ADF&G 2019a, Crowley 2019, pers. comm., KARAC 2021).

Regulatory Year	Total bulls: 100 cows	Calves: 100 cows	Total Calves	Total Cows	Total bulls	Composition Sample size <sup>a</sup>	Estimate of herd size
1996-1997							603 <sup>b</sup>
1997-1998							
1998-1999							
1999-2000		46				126	
2000-2001	40	21	13	62	25	406	983 <sup>c</sup>
2001-2002							
2002-2003	54	31	17	54	29	392	1,262 <sup>b</sup>
2003-2004							
2004-2005							1,006 <sup>b</sup>
2005-2006	45	7	5	66	29	730	1,009 <sup>b</sup>
2006-2007							806 <sup>b</sup>
2007-2008	31	6	4	73	23	433	
2008-2009	9	6	5	86	9	260	
2009-2010	5	3	3	92	5	221	400 <sup>b</sup>
2010-2011	8	8	7	86	7	284	
2011-2012	6	7	6	89	8	117	224 <sup>d</sup>
2012-2013	10	3	2	89	8	85	
2013-2014	10	19	15	78	8	67	192 <sup>e</sup>
2014-2015	15	22				127	230 <sup>b</sup>
2015-2016							334 <sup>b</sup>
2016-2017	33	40	60	149	49	258	
2017-2018	80	44				287 <sup>d</sup>	413 <sup>f</sup>
2020	78	34					

<sup>a</sup> Estimates based on October composition surveys  
<sup>b</sup> Estimates based on winter (January and April) counts by Izembek NWR staff.  
<sup>c</sup> Estimates based on July post calving counts and the proportion of the radio collared caribou encountered  
<sup>d</sup> May parturition survey by ADF&G  
<sup>e</sup> October census of entire island by Izembek NWR staff  
<sup>f</sup> Minimum count conducted by ADF&G

### Habitat

Unimak Island is the easternmost volcanic island in the Aleutian Islands, located 700 miles southwest of Anchorage just off the tip of the Alaska Peninsula (**Map 2**). It is the only Aleutian Island with natural populations of caribou, brown bear, and wolf. Ninety-eight percent of Unimak Island is designated as a wilderness. The village of False Pass, located across the mainland on Isanotski Strait, is the only permanent community on Unimak Island and has a population of 35 people (U.S. Census Bureau 2010).

Four volcanos are located on the island including Shishaldin (elevation 9,372 ft.), which is one of the 10 most active volcanos in the world (USFWS 2010). The Bering Sea lowland consists of a gently sloping plain on the north side of the island and is characterized by dense vegetation and numerous



lakes, streams, marshes and hills (Sekora 1971). The mean annual temperature is 38°F (range -10°F to 70.0°F) and temperatures below zero are rare. Winter lasts 6-9 months and snowfall averages 40-45 inches, which can accumulate into deep drifts. Rainfall, which averages 30-35 inches per year, is evenly distributed throughout the year. Winds average about 20 mph but maximum speeds of up to 100 mph have been recorded at Cape Sarichef.

Unimak Island is classified as a marine tundra environment. The absence of trees and large areas of barren ground result from high winds and recent volcanic activity. Dominant vegetation community types include dwarf-shrub cowberry tundra heath, sedge meadows, tall-shrub alder and low-shrub willow (Talbot et al. 2006). Skoog (1968) considered the caribou habitat on the Alaska Peninsula as marginal due to severe icing conditions and ash fall from frequent volcanic eruptions.

Valkenburg et al. (2003) noted that lichen biomass is low on the Alaska Peninsula due to historically sustained grazing by caribou, which is consistent with the finding that the diet of the UCH had higher proportions of forbs than other caribou herds (Legner 2014). Legner (2014) found that during the spring, summer, and fall the nutritional quality of the habitat seemed to be sufficient. In addition, the body condition of cows and calves from 2009 (USFWS 2010) to 2014 (Peterson 2013, Crowley 2015) indicated that nutrition was not limiting UCH population growth and survival. The pregnancy rate for Unimak caribou from 2006-2008 also indicated that the herd was in good nutritional condition even though calf recruitment remained low (Butler 2009). However, it is often the forage availability and quality during the winter that limits the productivity of caribou herds. Lichen species, mainly consisting of the lichens in the genus *Cladonia*, are typically the major component of caribou winter diet. However, the lichen species found mainly on Unimak Island are the foliose lichen group belonging to the *Peltigera* genus, a non-forage species for caribou. In addition, Unimak Island had a low occurrence of lichen in all vegetative community types (Legner 2014). Evidence suggests that forage quality and quantity on the winter range, versus summer range, may be a limiting factor for the UCH (Legner 2014).

### **Cultural Practices and Traditional Knowledge**

WP20-25 had a section 804 analysis. The proposal WP22-38a is covering the customary and tradition uses for the UCH.

### **Harvest History**

In 1997 the Board opened a subsistence hunt on Federal lands and the State opened a general hunt in 2001 (**Table 2**). A study on subsistence activity by Fall et al. (1990, 1996) reported that residents from False Pass hunted primarily on the Alaska Peninsula rather than Unimak Island. Although some unreported local harvest may occur, limited access is believed to constrain the UCH subsistence harvest (Bruce Dale, pers. comm. *in* USFWS 2010). The majority of the caribou harvest from 1997-2008, which averaged 12 annually, were taken by non-local residents. In 2018, 10 permits were allocated, four were issued, and three caribou were harvested on Unimak Island by False Pass residents (Fitzmorris 2019). In 2019, 10 permits were allocated – three were issued and three caribou were

harvested on Unimak Island. In 2020, 15 permits were allocated – one permit was issued, and zero caribou were harvested.

At the 2021 winter Council meeting, the ADF&G Area Biologist stated there are surplus bulls available for harvest from the UCH and that management of the UCH should be revised to avoid population eruptions and subsequent crashes like in past years. He also expressed concerns that harvest by Federally qualified subsistence users would not be enough to maintain the UCH at sustainable levels as most Federal users hunt the SAPCH in Unit 9D, where the harvest limit is three caribou by harvest ticket. Based on current population metrics and projections, he recommended an annual harvest of 25 bulls, provided parturition and productivity rates remain adequate, and stressed the need for timely harvest reporting. He also projected that, if the Federal closure was lifted and a State season opened, more non-resident hunters would likely harvest UCH under State regulations than resident hunters as non-residents already travel to Unimak Island for bear hunts (KARAC 2021).

**Table 2.** Unit 10 Reported Caribou Harvest 1997-2020 for the Unimak Island Caribou Herd (USFWS 2010, Crowley 2015, USFWS 2018a, 2018b, ADF&G 2019a, Fitzmorris 2019, Melendez 2020).

Year	Federal Registration Permits			State Harvest Tickets <sup>a</sup>			Total Reported Harvest <sup>b</sup>
	Permits Issued	Bulls Harvested	Cows Harvested	Permits issued	Bulls Harvested	Cows Harvested	
1997	11	6	0	HT	0	0	6
1998	10	4	0	HT	0	0	4
1999	0	0	0	0	0	0	0
2000	8	5	0	0	0	0	5
2001	0	0	0	HT	19	0	19
2002	4	0	0	HT	11	1	12
2003	0	0	0	HT	10	0	10
2004	0	0	0	HT	15	0	15
2005	0	0	0	HT	15	0	15
2006	1	1	0	HT	12	1	14
2007	12	2	0	HT	13	0	15
2008	0	0	0	HT	9	0	9
2018	4	3	0	0	0	0	3
2019	10	0	0	0	0	0	3

Year	Federal Registration Permits			State Harvest Tickets <sup>a</sup>			Total Reported Harvest <sup>b</sup>
	Permits Issued	Bulls Harvested	Cows Harvested	Permits issued	Bulls Harvested	Cows Harvested	
2020	1	0	0	0	0	0	0

<sup>a</sup> State season closed since 2008

<sup>b</sup> Does not include illegal or unreported harvest

### Other Alternative(s) Considered

One alternative considered was to extend the season, change the harvest limit from one bull to “up to three caribou” and delegate authority to the Izembek NWR Manager to announce harvest limits and set sex restrictions. This flexibility in the harvest limit and season could help achieve harvest objectives and provide additional opportunity to Federally qualified subsistence users when the UCH population could support additional harvest as well as help maintain the UCH within sustainable population levels and provide for a rural subsistence priority as mandated by Title VIII of ANILCA. The Council may want to further consider this alternative.

### Effects of the Proposal

If this proposal is adopted, it would open caribou hunting on Unimak Island to all Federally qualified subsistence users. If Proposal WP22-38a is adopted, the number of Federally qualified subsistence users would be expanded to also include Cold Bay and Nelson Lagoon, which could result in some additional harvest pressure on the UCH, though it is unlikely. The UCH is difficult to access and participation in harvest by Federally qualified subsistence users was low in the past when the hunt was open to all users under State and Federal regulations. Harvest pressure from Federally qualified subsistence users is expected to remain low.

The proposal also requests opening the hunt to all users if the population exceeds a threshold to be determined by State and Federal wildlife biologists. This would maximize harvest opportunity for all user groups, while mitigating conservation concerns by helping to prevent overharvest. The UCH has experienced drastic population fluctuations since at least 1975. Enabling flexible management of the UCH by balancing hunting opportunity with conservation could help maintain a sustainable caribou population and reduce the likelihood of population crashes or exceedance of carrying capacity. Currently, management recommendations are to increase the harvest limit to 25 bulls and delegating authority to the Izembek NWR Manager, to be able announce harvest quotas and permit numbers each year to help ensure sustainable harvests and respond to changing conditions.

During the Council’s 2021 winter meeting, the ADF&G area biologist stated that maintaining the current Federal regulations would likely result in another population eruption, followed by habitat damage and, subsequently, a population crash like has happened in the past (KARAC 2021). He recommended a harvest of 25 bulls based on the highest reported historical harvest from the UCH, which was 19 caribou in 2001. However, Crowley (2020) stated that controlling the size of the UCH

through harvest may not be possible given the remoteness of the herd, access difficulty, and hunter limitations.

Bull:cow ratios are an important consideration in addition to total population size. Currently, the harvest limit is one bull, and bull:cow ratios are high. If bull:cow ratios decline to single digits similar to 2008-2012, any harvest of bulls could limit population growth by preventing cows from becoming pregnant.

The Izembek National Wildlife Refuge Manager was designated to assist in conservation of the UCH. The Delegation of Authority letter for the UCH is attached (**Appendix 1**); this will continue to apply with the proposed management of the herd for a population threshold. By managing the herd for a population threshold, as has been done for the Nushagak Caribou herd (NCH), it is anticipated that the chances of another population crash will be minimized. The NCH has been managed for a population threshold for several years successfully, following years of conservation concerns for the herd.

## **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP22-38B **with modification** to establish a population threshold of 800 caribou.

The modified regulation should read:

### **Unit 10—Caribou**

*Unit 10, Unimak Island only—1 bull by Federal registration permit. Aug. 1-Sep. 30.*

*Federal public lands are closed to the taking of caribou except by ~~residents of False Pass~~ **Federally qualified subsistence users unless the population estimate exceeds 800 caribou.***

### **Justification**

Opening the Unimak Island caribou hunt to all Federally qualified subsistence users increases subsistence harvest opportunity. The harvest quota and permit numbers, set annually by the Izembek NWR Manager, ensures that harvests remain within sustainable levels and respond to changing hunt and herd conditions.

ADF&G biologists recommended a population objective for the UCH of 800-1,000 caribou based on past population fluctuations. The threshold of 800 caribou balances hunting opportunity for all users with conservation. Maintaining the UCH within this range should help prevent hunting closures, population crashes, and exceedance of carrying capacity. Opening the hunt to all users if the population exceeds the lower bound of the population objective should help maintain the population within sustainable levels.

## LITERATURE CITED

Adams, L.G., F.G. Singer, and B.W. Dale. 1995. Caribou calf mortality in Denali National Park. *Alaska Journal of Wildlife Management* 59:584-594.

ADF&G and USFWS 2007. Southern Alaska Peninsula Caribou Herd Operational Plan (Draft) 7 pages.

ADF&G. 2017. Wildlife Special Action WP20-25: Temporary Special Action Request. Memorandum May 2, 2018. ADF&G, Juneau, AK. 2 pp.

ADF&G. 2019a. Harvest General Reports database.  
[https://secure.wildlife.alaska.gov/index.cfm?adfg=harvest.main&\\_ga=1.109733509.1089519111.1465854136](https://secure.wildlife.alaska.gov/index.cfm?adfg=harvest.main&_ga=1.109733509.1089519111.1465854136),  
 accessed March 4, 2019. Anchorage, AK.

ADF&G. 2019b. Comments on Wildlife Special Action Request WP20-25. Memorandum May 31, 2019. ADF&G, Juneau, AK. 4 pp.

Bergerud, A.T. 1974. Rutting behaviour of the Newfoundland caribou. Pages 395-435 *in* V. Geist and F. Walther, eds. *The behaviour of ungulates and its relation to management*. World Conservation Union, Morges, Switzerland.

Bergerud, A.T. 1980. A review of the population dynamics of caribou and wild reindeer in North America. Pages 556-581 *in* S. Demarias and P.R. Krausman, editors, *proceeding of the Second International Reindeer/Caribou Symposium*, Direktoratet for vild og frskvannsfisk, Trondheim, Norway.

Beals, F.E., and J.E. Longworth. 1941. Pages 11-25 (unnumbered) *in* *Wildlife observations from Unimak Island between Jan. and June 1941*. Unpublished USFWS “sea otter” report. Smithsonian Institution Archives, Record Unit 7176, Box 5, Folder 4. (Copy in files at the Alaska Maritime National Wildlife Refuge).

Butler, L. 2005. Unit 10 caribou management report. Pages 57-60 *in* C. Brown, ed. *Caribou management report of survey and inventory activities 1 July 2002-30 June 2004*. ADF&G. Juneau, AK.

Butler, L. 2007. Unit 10 caribou management report. Pages 51-55 *in* P. Harper, ed. *Caribou management report of survey and inventory activities 1 July 2004-30 June 2006*. ADF&G. Juneau, AK.

Butler, L. 2008. Memorandum: Unimak Caribou Herd composition survey, October 21, 2008. ADF&G. King Salmon, AK. 3 pages.

Butler, L. 2009. AK. Unit 10 caribou management report. Pages 52-57 *in* P. Harper, ed. *Caribou management report of survey and inventory activities 1 July 2006-30 June 2008*. ADF&G. Juneau, AK.

Colson, K.E., K.H. Mager, and K.J. Hundertmark. 2014. Reindeer introgression and the population genetics of caribou in southwestern Alaska. *Journal of Heredity* 105(5):585-596.

Crowley, D.W. 2015. Unit 10 Unimak caribou. Chapter 6, Pages 6-1 through 6-10 *in* P. Harper and L.A. McCarthy, editors. *Caribou management report of survey and inventory activities 1 July 2012-30 June 2104*. ADF&G, Species Management Report ADF&G/DWC/SMR-2015-4, Juneau, AK.

Crowley, D. 2016. Memorandum: Units 9 and 10 caribou composition surveys. ADF&G. King Salmon, AK. 5

Crowley, D. 2018. Wildlife Biologist. Personal communication: e-mail: ADF&G. King Salmon, AK.

Crowley, D. W. 2020. Caribou management report and plan, Game Management Unit 10: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-1, Juneau, AK.

Environment Yukon. 2016. Science-based guidelines for management of Northern Mountain caribou in Yukon. Yukon Fish and Wildlife Branch Report MR-16-01. Whitehorse, Yukon, Canada.

Fall, J.A., C.L. Brown, N.M. Braem, L. Hutchinson-Scarborough, D.S. Koster, T.M. Krieg, and A.R. Brenner. 2012. Subsistence harvests and uses in three Bering Sea communities, 2008: Akutan, Emmonak, and Togiak. ADF&G, Division of Subsistence. Technical Paper no. 371, Anchorage, AK. 304 pp.

Fitzmorris, P. 2019. Izembek National Wildlife Refuge Report for the Kodiak/Aleutians Subsistence Regional Advisory Council, April 22-23, 2019. 10 pp.

Fitzmorris, P. 2020. Wildlife Biologist. Izembek National Wildlife Refuge. Personal communication: e-mail.

Irvine, C. 1976. Population size of the Alaska Peninsula caribou herd. Alaska Department of the Fish and Game. Federal Aid in Wildlife Restoration. Research Final Report. Grants W-17-7 and W-17-8. Study 3.17R. ADF&G. Juneau, AK. 10 pp.

Keech, M. and P. Valkenburg. 2007. Population dynamics of Interior and Southwest caribou herds. Research Final Performance Report, 1 July 2001-30 June 2007, Federal Aid in Wildlife Restoration Grants W-27-5, W33-1, W-33-2, W33-3, W33-4, W33-5. Project 3.45 ADF&G. Juneau, AK

KARAC. 2017. Transcripts of the Kodiak/Aleutians Subsistence Regional Advisory Council proceedings. February 22, 2017. Kodiak, AK. Office of Subsistence Management. USFWS. Anchorage, AK.

KARAC. 2018. Transcripts of the Kodiak/Aleutians Subsistence Regional Advisory Council proceedings. September 27, 2018. Cold Bay, AK. Office of Subsistence Management. USFWS. Anchorage, AK.

KARAC. 2019. Transcripts of the Kodiak/Aleutians Subsistence Regional Advisory Council proceedings. April 22-23, 2019. Kodiak, AK. Office of Subsistence Management. USFWS. Anchorage, AK

KARAC. 2021. Transcripts of the Kodiak/Aleutians Subsistence Regional Advisory Council proceedings. March 10, 2021. Teleconference. Office of Subsistence Management. USFWS. Anchorage, AK

Legner, K.A. 2014. Seasonal movements, diet composition, and diet nutritional quality of Unimak Island caribou. M.S. Thesis. University of Alaska Anchorage, Anchorage, AK. 181 pp.

Murie, O.J. 1959. Fauna of the Aleutian Islands and Alaska Peninsula. *North American Fauna* 61:1-406.

Melendez, L. 2021. Deputy Refuge Manager. Izembek National Wildlife Refuge. Personal communication: email.

- OSM. 1991. Staff analysis P91–101. Pages 29–30 *in* Federal Subsistence Board Meeting Materials May 4–May 8, 2010. Office of Subsistence Management, USFWS. Anchorage, AK. 240 pp.
- OSM. 1993. Staff analysis S93-01. Office of Subsistence Management, USFWS. Anchorage, AK. 1 pp
- OSM. 1994. Staff analysis P94–28. Pages 229–236 *in* Federal Subsistence Board Meeting Materials May 18–May 21, 1994. Office of Subsistence Management, USFWS. Anchorage, AK. 1083 pp.
- OSM. 1997. Staff analysis S97-01. Office of Subsistence Management, USFWS. Anchorage, AK. 1 pp
- OSM. 1998. Staff analysis S98-05. Office of Subsistence Management, USFWS. Anchorage, AK. 1 pp
- OSM. 1999. Staff analysis S99-04. Office of Subsistence Management, USFWS. Anchorage, AK. 1 pp
- OSM. 2000. Staff analysis P00–029. Pages 302–311 *in* Federal Subsistence Board Meeting Materials May 2–May 4, 2010. Office of Subsistence Management, USFWS. Anchorage, AK. 661 pp.
- OSM. 2003a. Staff analysis WSA03-08. Office of Subsistence Management, USFWS. Anchorage, AK. 6 pp
- OSM. 2003b. Staff analysis WSA03-10. Office of Subsistence Management, USFWS. Anchorage, AK. 7 pp
- OSM. 2004. Staff analysis WP04–40. Pages 1126–1138 *in* Federal Subsistence Board Meeting Materials May 18–May 21, 2004. Office of Subsistence Management, USFWS. Anchorage, AK. 1041 pp.
- OSM. 2008a. Staff analysis WP08–25. Pages 115–122 *in* Federal Subsistence Board Meeting Materials April 29–May 1, 2008. Office of Subsistence Management, USFWS. Anchorage, AK. 599 pp.
- OSM. 2008b. Staff analysis WP08–26. Pages 123–134 *in* Federal Subsistence Board Meeting Materials April 29–May 1, 2008. Office of Subsistence Management, USFWS. Anchorage, AK. 599 pp.
- OSM. 2009a. Staff analysis WSA09-06. Office of Subsistence Management, USFWS. Anchorage, AK. 11 pp
- OSM. 2009b. Staff analysis WSA09-07. Office of Subsistence Management, USFWS. Anchorage, AK. 12 pp
- OSM. 2010. Staff analysis WP10–42. Pages 462–472 *in* Federal Subsistence Board Meeting Materials May 18–May 21, 2010. Office of Subsistence Management, USFWS. Anchorage, AK. 1083 pp.
- OSM. 2018. Staff analysis WSA18-01. Office of Subsistence Management, USFWS. Anchorage, AK. 26 pp
- Peterson, C. 2013. Unit 10 caribou management report. Pages 68-75 *in* P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2101-30 June 2012. ADF&G, Species Management Report ADF&G/DWC/SMR-2013-3. Juneau, AK.
- Peterson, C. 2018. Wildlife biologist. Personal communication: e-mail: ADF&G. King Salmon, AK.
- Riley, M.D., 2011. Unit 10 caribou management report. Pages 53-59 *in* P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2008-30 June 2010. ADF&G. Juneau, AK.

Sekora, P. 1971. Unimak Island Wilderness Study, Aleutian Islands National Wildlife Refuge, Third Judicial District, Alaska: Wilderness Study Report, U.S. Department of the Interior, U. S. Fish and Wildlife Service, Bureau of the Fisheries and Wildlife.

Sellers, R.A. 1999. Southern Alaska Peninsula. Pages 47-54 in M.V. Hicks, ed. Caribou herd management progress report of survey and inventory activities 1 July 1998-30 June 2000. Juneau, AK.

Sellers, R.A., P. Valkenburg, R.C. Squibb, B. Dale, and R.L. Zarnke. 2003. Natality and calf mortality of the Northern Alaska Peninsula and the Southern Alaska Peninsula caribou herds. *Rangifer*, Special Issue 14:161-166.

Skoog, R.O. 1968. Ecology of caribou (*Rangifer tarandus granti*) in Alaska. Ph.D. Dissertation, University of Alaska Fairbanks, Fairbanks, AK. 699 pp.

Talbot, S.S., S.L. Talbot, W.B. Schofield. 2006. Vascular flora of Izembek National Wildlife Refuge, Westernmost Alaska Peninsula, Alaska. *Rhodora*. 108(935):249-253.

Talbot, S.L. 2018. Wildlife geneticist. Personal communication: email. U.S. Geological Service, Alaska Science Division, Anchorage, AK.

U.S. Census Bureau, 2010. Census of Population and Housing Unit Counts, CPH-2-3, Alaska. U.S. Government Printing Office, Washington, D.C., 2012. 76 pp. <https://www.census.gov/prod/cen2010/cph-2-3.pdf>

U.S. Fish and Wildlife Service (USFWS). 2010. Management Alternatives for the Unimak Island Caribou Herd: Environmental Assessment. USFWS. Anchorage, AK. 94 pp.

U.S. Fish and Wildlife Service (USFWS). 2018a. Izembek National Wildlife Refuge Report for the Kodiak/Aleutians Federal Subsistence Regional Advisory Council. Fall Meeting – September 2018. Izembek National Wildlife Refuge, Cold Bay, AK. 24 pp.

U.S. Fish and Wildlife Service (USFWS). 2018b. OSM database. Office of Subsistence Management. USFWS, Anchorage, AK.

Valkenburg, P., Sellers, R.A., Squibb, R.C., Woolington, J.D., Aderman, A.R., and Dale, B., 2003. Population dynamics of caribou herds in southwestern Alaska. *Rangifer*, Special Issue No. 14:131-142.

Zittlau, K. 2004. Population genetic analyses of North American caribou (*Rangifer tarandus*) Ph.D. Dissertation. University of Alberta, Edmonton, Canada.



## Appendix 1



FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

## Federal Subsistence Board

1011 East Tudor Road, MS121  
Anchorage, Alaska 99503-6199



FOREST SERVICE

OSM 20077.CM

DEC 01 2020

Refuge Manager  
Izembek National Wildlife Refuge  
P.O. Box 127 MS 515  
Cold Bay, Alaska 99571-0127

Dear Refuge Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Izembek National Wildlife Refuge Manager to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of the population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Unit 10, Unimak Island, for the management of caribou on these lands.

It is the intent of the Board that actions related to management of caribou by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), representatives of the Office of Subsistence Management (OSM), and the Chair of the affected Council(s) to the extent possible. The Office of Subsistence Management will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

### DELEGATION OF AUTHORITY

**1. Delegation:** The Izembek National Wildlife Refuge Manager is hereby delegated authority to issue emergency or temporary special actions affecting caribou on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

**2. Authority:** This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board."

**3. Scope of Delegation:** The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

To set the harvest quota, close the season, and set any needed permit conditions for caribou.

This delegation also permits you to close and reopen Federal public lands to nonsubsistence hunting, but does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve caribou populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations or adjustments to methods and means of take, shall be directed to the Board.

The Federal public lands subject to this delegated authority are those within Unit 10, Unimak Island.

**4. Effective Period:** This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

**5. Guidelines for Delegation:** You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 50 CFR 100.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected Federally qualified subsistence users and non-Federally qualified users. Requests not within your delegated authority will be forwarded to the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Government to Government Tribal Consultation Policy (Federal Subsistence Board Government to Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).

You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

Refuge Manager

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If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of Federally qualified subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. **Support Services:** Administrative support for regulatory actions will be provided by OSM.

Sincerely,



Anthony Christianson  
Chair

cc: Federal Subsistence Board  
Assistant Regional Director, Office of Subsistence Management  
Deputy Assistant Regional Director, Office of Subsistence Management  
Subsistence Policy Coordinator, Office of Subsistence Management  
Wildlife Division Supervisor, Office of Subsistence Management  
Kodiak/Aleutians Subsistence Council Coordinator, Office of Subsistence Management  
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council  
Deputy Commissioner, Alaska Department of Fish and Game  
Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record

<b>WP22-39 Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP22-39 requests to create specific harvest regulations for Alaska hare ( <i>Lepus othus</i> ) in Units 9 and 17. Submitted by: Alaska Department of Fish and Game.
<b>Proposed Regulation</b>	<p>§100.25(j)(2) If you take wildlife for subsistence, you must salvage the following parts for human use:</p> <p>(iv) The hide or meat of squirrels, hares, marmots, beaver, muskrats, or unclassified wildlife.</p> <p><b>Unit 9—Hare</b></p> <p>Snowshoe hare (<del>Snowshoe and Tundra</del>): No limit July 1-June 30</p> <p>Alaska hare: 1 hare per day / 4 per season Nov. 1 – Jan. 31</p> <p><b>Unit 17 - Hare</b></p> <p>Snowshoe hare (<del>Snowshoe and Tundra</del>): No limit July 1-June 30</p> <p>Alaska hare: 1 hare per day / 4 per season Nov. 1 – Jan. 31</p>
<b>OSM Preliminary Conclusion</b>	<p><b>Support</b> Proposal WP22-39 with <b>modification</b> to modify the definition of hare in Federal regulations.</p> <p>The modified regulations should read:</p> <p><b>§100.25(a) Definitions:</b></p> <p>Hare or hares collectively refers to all species of hares (commonly called rabbits) in Alaska and includes snowshoe hare and tundra <b>or</b> Alaska hare.</p>
<b>Bristol Bay Subsistence Regional Advisory Council</b>	
<b>Kodiak/Aleutians Subsistence Regional Advisory Council</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	None

**DRAFT STAFF ANALYSIS**  
**WP22-39**

**ISSUES**

Proposal WP22-39, submitted by Alaska Department of Fish and Game (ADF&G), requests to create specific harvest regulations for Alaska hare (*Lepus othus*) in Units 9 and 17.

**DISCUSSION**

The proponent states that, the once (as recently as the 1980s) abundant Alaska hare in Units 9 and 17 are now at a very low density and has a patchy distribution throughout Bristol Bay and the Alaska Peninsula. In Alaska, the species ranges throughout the western and southwestern portions of the state. Very little is known about the Alaska hare, the apparent decrease in abundance may have been caused by changes in habitat, predation, human harvest, or other natural cyclical events. There are infrequent observations of Alaska hares near King Salmon, Dillingham, and other communities throughout the Bristol Bay region. Alaska hares are not highly productive; they have only one, relatively small-sized litter of young per year. The proponent believes that the limited-management approach of the last 50 years no longer sufficiently addresses appropriate conservation of this species. This proposal would reduce hunting opportunity for this species both in terms of season duration and harvest limits. The reduction in harvest may assist hare populations to increase throughout Units 9 and 17.

The proponent also requested establishing a human use salvage requirement for hare in Units 9 and 17. However, this provision already exists under Federal regulations (see existing Federal regulations section) and is therefore not considered further in this analysis.

Note: The Alaska hare is sometimes called jack rabbits, tundra hare or arctic hare (e.g. Anderson 1974; Klein 1995; Murray 2003; ADF&G 2019a). Federal subsistence regulation uses the term tundra hare, but Alaska hare appears to be the dominate term in contemporary usage, including in State regulation. This analysis contains the terms Alaska hare and tundra hare, used synonymously. It should also be noted that the Alaska or tundra hare is a distinct species from the snowshoe hare, despite the inclusion of both species in the same Federal regulation.

**Existing Federal Regulation**

*§100.25(j)(2) If you take wildlife for subsistence, you must salvage the following parts for human use:*

*(iv) The hide or meat of squirrels, hares, marmots, beaver, muskrats, or unclassified wildlife.*

**Unit 9—Hare**

*Hare (Snowshoe and Tundra): No limit*

*July 1-June 30*

**Unit 17 - Hare**

*Hare (Snowshoe and Tundra): No limit*

*July 1-June 30*

**Proposed Federal Regulation**

§100.25(j)(2) *If you take wildlife for subsistence, you must salvage the following parts for human use:*

*(iv) The hide or meat of squirrels, hares, marmots, beaver, muskrats, or unclassified wildlife.*

**Unit 9—Hare**

*Snowshoe hare (~~Snowshoe and Tundra~~): No limit*

*July 1-June 30*

*Alaska hare: 1 hare per day / 4 per season*

*Nov. 1 – Jan. 31*

**Unit 17 - Hare**

*Snowshoe hare (~~Snowshoe and Tundra~~): No limit*

*July 1-June 30*

*Alaska hare: 1 hare per day / 4 per season*

*Nov. 1 – Jan. 31*

**Existing State Regulation**

**Unit 9—Hare**

*Snowshoe hare: No limit*

*No closed season*

*Alaska hare: One per day, four total*

*Nov. 1 – Jan. 31*

*Hunters must salvage the hide or meat of Alaska hares taken in Unit 9.*

*Hunters are also encouraged to report harvest of Alaska hares to*

*ADF&G in King Salmon at (907) 246-3340*

**Unit 17 - Hare**

*Hare: No limit*

*No closed season*

*Including Alaska and snowshoe hare.*

## Relevant Federal Regulation

### §100.25(a) Definitions:

*Hare or hares collectively refers to all species of hares (commonly called rabbits) in Alaska and includes snowshoe hare and tundra hare.*

### Extent of Federal Public Lands

Unit 9 is comprised of 52.8% Federal public lands and consist of 28.1% National Park Service (NPS) managed lands, 21.9% U.S. Fish and Wildlife Service (USFWS) managed lands, and 2.8% Bureau of Land Management (BLM) managed lands.

Unit 17 is comprised of 27.8% Federal public lands and consist of 21.0% USFWS managed lands, 3.5% BLM managed lands, and 3.3% NPS managed lands.

### Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for hare in Units 9 and 17. Therefore, all rural residents of Alaska may harvest this species in these units.

### Regulatory History

Federal subsistence regulations for hare in Units 9 and 17 have not been changed since 1990, when the Federal management of subsistence fish and wildlife resources on Federal public lands began. At that time, a year-round season with no harvest limit was adopted from State regulation.

State regulation included a year-round season with no harvest limit for hare in Unit 9 until RY2018/19, when ADF&G submitted Proposal 135 for the BOG's consideration. Noting very low densities and patchy distribution of Alaska hares on the southern Alaska Peninsula, ADF&G originally requested that the season for Alaska hares in a portion of Unit 9 be closed entirely. After discussion with locals and staff, they amended their proposal to reduce the season throughout Unit 9 to Nov. 1 – Jan. 31, with a harvest limit of one per day and four annually, and require that either the hide or the meat be salvaged (RC55). ADF&G noted that Alaska hares are of interest to residents of Unit 9 and that offering a season, even restricted one, allows for opportunistic harvest of Alaska hares. They also noted that it provides an opportunity for biologists to gather information from hunters about Alaska hare locations and relative abundance. To this end, ADF&G recommended inclusion of language encouraging voluntary reporting of Alaska hare harvest. This proposal had the support of both active Fish and Game Advisory Committees in the region. The BOG adopted the amended version of the proposal and supported inclusion of the voluntary reporting language. The BOG also adopted a positive finding for customary and traditional use of Alaska hare in Units 9, 10 and 17 (BOG 2019).

In 2020, Proposal WP20-30, was submitted by the Alaska Peninsula/Becharof National Wildlife Refuges requesting to shorten the year-round season for Alaska hares in Unit 9 to Nov. 1 – Jan. 31, and to reduce the harvest limit from no limit to one per day and four annually, which would have aligned

with the recently adopted State regulations. The proposal was rejected by the Board, stating that harvest and population numbers were unknown, and the season end date appeared to be too restrictive. The Board felt that more research was needed to understand the status of the species and is needed prior to adopting the proposal to set season dates. Traditionally, the winter months are when hares are harvested for winter protein.

### **Current Events Involving the Species**

The ADF&G also submitted Wildlife Proposal WP22-45 to create specific harvest regulations for Alaska hare in Units 18, 22, and 23.

The ADF&G has submitted Proposal 24 to the BOG (January 2022) to include Unit 17 with an identical Alaskan hare management structure as Unit 9. ADF&G states that given the ongoing research, continued low abundance, and public concern about this species, it is important to consider a cohesive and comprehensive management framework for this species across the entire Alaska hare range within Alaska.

### **Biological Background**

Taxonomy of the three species of northern hares remains unresolved, which almost certainly contributes to the confusion around common names. Current taxonomic descriptions rely on geographic distributions, rather than morphologic or molecular distinctions, which remain ambiguous. The arctic hare (*Lepus arcticus*) is widely distributed across tundra habitats of Greenland and northern Canada. The mountain hare (*L. timidus*) occurs in northern Eurasia, from eastern Russia to Scandinavia (Cason 2016). Alaska hares are limited to coastal western and southwestern Alaska, ranging from the Baldwin and Seward Peninsulas in the north, to the Alaska Peninsula in the south (Merizon and Carroll 2019).

Alaska hares are among the largest of the *Lepus* genus, weighing approximately 8.5 – 10.5 pounds (Murray 2003). They occupy coastal lowlands, wet meadows, and willow and alder thickets (Merizon and Carroll 2019), and feed on willow buds, leaves, and crowberries (Murray 2003). They are typically solitary, except during breeding season. Alaska hares reproduce a single litter each year, breeding between April and June and giving birth approximately 6.5 weeks later. Litters contain 6.3 young on average, which are fully weaned within 5 – 9 weeks (Murray 2003). Alaska hares can be identified by the black-tipped ears and are significantly larger than the snowshoe hare (ADG&G 2019).

The Alaska hare is among the most poorly understood wildlife species in Alaska. Hunter questionnaires have been the only source of information about the species and there has been no long-term population monitoring.

Alaska Peninsula/Becharof NWR ranked the Alaska hare as the Refuge's #3 prioritized Resource of Concern as an ecologically significant endemic species vulnerable to the influence of climate change. Resource managers know little about Alaska hare habitat preference (Smith 2021, pers. comm.). Alaska hares occur at low density, and exhibit much lower fecundity than snowshoe hares and are



perhaps decreasing in range and numbers (Best & Henry, 1994). The last known eruptive population on the Peninsula occurred in the winter of 1953-54 (Schiller and Rausch 1956). The pervasive influence of predation on hares implies strong selection on their cryptic coloration (Merilaita 2009) and against sustained seasonal mismatch in coat color (Griffin and Mills 2009, Litvaitis 1991). It is unknown how much plasticity exists in these traits, nor how much seasonal color mismatch is expected in the future with climate change, as snow cover now lasts a shorter time in the fall and spring (Mills et al. 2013).

There is an effort to better understand this species. Beginning in 2017, ADF&G began to evaluate capture techniques. They also embarked on a tour of rural communities throughout the range of the Alaska hare to discuss local observations, historical abundance, and harvest patterns. In 2018, a multi-year study was initiated to evaluate movement and mortality, as well as long-term capture techniques. Anecdotal observations suggest that Alaska hare abundance is well below that observed in the 1950s and 1960s, throughout its range. It is unknown whether the population has been in a long-term decline, or whether it experienced a crash and now exists as a low density but relatively stable population (Merizon and Carroll 2019).

### **Harvest History**

Little is known about the harvest of Alaska hare, which is one of the least accessible small game species. However, it is harvested throughout the communities of western and southwestern Alaska as documented in household harvest surveys (Merizon and Carroll 2019, **Table 1**). Some insights into smaller wildlife species harvest are available in ADF&G's Statewide Small Game Hunter Survey, results for which were compiled for, regulatory year, RY2011/12 and RY2013/14.

The most recent results, from RY2013/14, show that half of the hunters responding to the survey reported hunting small game in Units 13, 14 or 20, while only about 5% of respondents reported hunting small game in Unit 9 and about 4% in Unit 17. Response rates were not similar among geographic areas of the State. The Alaska Peninsula (Unit 9; 24%) and Western Rural (Units 17, 18, 22, and 23; 16%) had much lower survey response rates than compared to the larger urban centers of Alaska, like Anchorage (35%) and the Mat-Su (34%). Therefore, it is difficult to accurately understand the overall harvest pressure on small game in those areas. Most Alaska resident respondents reported hunting within the geographic region where they reside, but only 3% of respondents reported participating in Federal subsistence small game hunts. Respondents reported that they hunt small game opportunistically while engaging in other activities, but also target small game specifically. Statewide, ptarmigan and spruce grouse were targeted most frequently. Within the Alaska Peninsula, respondents reported hunting for Alaska hare for an average of 2.5 days each year (Merizon et al. 2015).

**Table 1.** Alaska hare harvest by community (Wiita et al. 2018)

Unit 9			Unit 17		
Community	Study Year	Estimated total Harvest	Community	Study Year	Estimated total Harvest
Chignik City	1984	4	Aleknagik	1989	23
	1989	0		2008	0
	1991	0	Clarks Point	1989	26
Chignik Lagoon	1984	0	Dillingham	2008	0
	1989	3		2010	83
Chignik Lake	1984	0	Ekwok	1987	13
	1989	3	Koliganek	1987	13
	1991	0	Manokotak	2008	0
Egehik	1984	3	New Stuyahok	1987	20
Igiugig	1983	0	Togiak	2008	0
	1992	17			
Iliamna	1983	0			
	1991	34			
Ivanof Bay	1984	3			
	1989	0			
King cove	1992	38			
King Salmon	1983	20			
Kokhanok	1983	43			
	1992	293			
Levelock	1988	51			
	1992	9			
Naknek	1983	24			
	2007	3			
Newhalen	1983	0			
	1991	80			
Nondalton	1973	0			
	1980	38			
	1981	18			
	1983	0			
Pedro Bay	1982	1			
	1996	0			
Perryville	1984	7			
	1989	0			
Pilot Point	1987	7			
Port Alsworth	1983	20			
Sand Point	1992	147			

Unit 9		
South Naknek	1983	12
	1992	0

\*Note- Some Community/Study years not included in this table only showed harvest for “Hares, Jackrabbits, Unknown.” Actual harvest maybe higher.

**Effects of the Proposal**

If this proposal is adopted, opportunity to harvest Alaska hares under Federal subsistence regulation will be reduced. Given that the State season has already been reduced for Unit 9, and ADF&G submitted a proposal to the BOG (January 2022) to include Unit 17, this represents an actual reduction of opportunity for Federally qualified subsistence users. This change will result in reduced harvest of Alaska hare, particularly since it includes both a daily and an annual harvest limit. Though neither harvest nor population size are quantified, harvest reduction has the potential to improve the conservation status of the Unit 9 and Unit 17 Alaska hare populations, which is reported to be well below historical size. Adoption of this proposal will also reduce regulatory complexity in Unit 9 by aligning Federal regulation with recently changed State regulation, as well as in Unit 17 if the BOG adopts Proposal 24.

**OSM Preliminary Conclusion**

**Support** Proposal WP22-39 with **modification** to modify the definition of hare in Federal regulations.

The modified regulations should read:

**§100.25(a) Definitions:**

*Hare or hares collectively refers to all species of hares (commonly called rabbits) in Alaska and includes snowshoe hare and tundra **or Alaska** hare.*

**Unit 9—Hare**

*Snowshoe hare (~~Snowshoe and Tundra~~): No limit* *July 1-June 30*

*Alaska hare: 1 hare per day / 4 per season* *Nov. 1 – Jan. 31*

**Unit 17 - Hare**

*Snowshoe hare (~~Snowshoe and Tundra~~): No limit* *July 1-June 30*

*Alaska hare: 1 hare per day / 4 per season* *Nov. 1 – Jan. 31*

## Justification

Anecdotal information indicates that Alaska hares in Units 9 and 17 are scarcer than they have been in the past. Local managers concur that Alaska hares in this region exist at a low density and is the #3 prioritized Resource of Concern as an ecologically significant endemic species vulnerable from the influence of climate change. Biologically, it is appropriate to restrict harvest in such a situation. Reducing the season from July 1 – June 30 to Nov. 1 – Jan. 31 reduces the season by 75% yet continues to offer Federally qualified subsistence users the opportunity to harvest Alaska hares during winter when they are engaging in other subsistence activities.

Imposing a harvest limit of 1 per day and 4 annually may have a greater effect on reducing overall harvest and promoting population recovery. Collectively, changes in season and harvest limit offer a balance between imposing conservation measures and allowing for the continuation of subsistence uses in the near term. Any positive effect these changes have on the Alaska hare population will benefit subsistence users in the long term.

## LITERATURE CITED

- ADF&G. 2019. Alaska hare (*Lepus othus*) species profile. ADF&G. Juneau, AK.  
<http://www.adfg.alaska.gov/index.cfm?adfg=alaskahare.main>. Retrieved May 24, 2021.
- Anderson, H.L. 1974. Range of the tundra hare. *The Murrelet*. 59(2): 72-74.
- Best, T. L., & Henry, T. H. 1994. *Lepus othus*. *Mammalian Species*, No. 458, 1-5
- BOG. 2019. Audio transcripts of the Alaska Board of Game proceedings. February 23, 2018. Dillingham, AK. ADF&G. Juneau, AK.
- Cason, M.M. 2016 Revised distribution of and Alaskan endemic, the Alaska Hare (*Lepus othus*), with implications for taxonomy, biogeography, and climate change. *Arctic Science*. 2:50 – 66.
- Griffin P.C., Mills L.S. 2009. Sinks without borders: snowshoe hare dynamics in a complex landscape. *Oikos* 118(10), 1487-1498. (doi:10.1111/j.1600-0706.2009.17621.x).
- Klein, D.R. 1995. Tundra or Arctic hare. Page 259 in E.T. LaRoe, G.S. Farris, C.E. Puckett, P.D. Doran and M.J. Mac, eds. *Our living resources: A report to the nation of the distribution, abundance, and health of U.S. plants, animals, and ecosystems*. U.S. Department of the Interior. National Biological Service. Washington, D.C. 530 pp.
- Litvaitis, J.A. 1991. Habitat use by snowshoe hares, *Lepus-americanus*, in relation to pelage color. *Can Field Nat* 105 (2):275–277.
- Merilaita, S.M. 2009. Animal camouflage: Current issues and new perspectives. *Phil Trans R Soc B Biol Sci* 364(1516):423–427.

Merizon, R.A., S.J. Carson and L.S. Honig. 2015. Statewide small game hunter survey, 2014. ADF&G. Juneau, AK.

Merizon, R.A. and C.J. Carroll. 2019. Status of grouse, ptarmigan, and hare in Alaska, 2017 and 2018. ADF&G. Juneau, AK.

Mills, L. S., Zimova, M., Oyler, J., Running, S., Abatzoglou, J. T., & Lukacs, P. M. 2013. Camouflage mismatch in seasonal coat color due to decreased snow duration. *Proceedings of the National Academy of Sciences of the United States of America*, 110, 7099–7528.

Murray, D.L. 2003. Snowshoe hares and other hares. Pages 147 – 175 in G.A Feldhamer, B.C. Thompson and J.A. Chapman, eds. *Wild mammals of North America: Biology Management and Conservation*. The Johns Hopkins University Press. Baltimore, MD. 1216 pp.

Schiller, E.L., and R. Rausch. 1956. Mammals of the Katmai National Monument, Alaska. *Arctic* 9:191-201.

Smith, W. 2021. Supervisory Wildlife biologist. Personal communication: email. USFWS. King Salmon, AK.

Wiita, A. L., J. M. Keating, and B. L. Davis. 2018. Customary and Traditional Use Worksheet, Alaska Hare and Snowshoe Hare, Game Management Units 9, 10, 11, 13, 16B, and 17. ADF&G Division of Subsistence, Special Publication No. 2018-02, Anchorage. AK.

**Statewide Proposals Outside of the Kodiak/Aleutians Region**

Proposal	Proponent	Species	Unit	Summary	Issue	Preliminary OSM Conclusion
WP22-03	ADF&G	Wolf	2	Modify Sealing requirements	Requests that all wolves taken in Unit 2 be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.	<b>Support</b>
WP22-12	SCRAC	Deer	6D	Revise hunt areas and season dates	Requests that the deer season in Unit 6 be extended through January 31.	<b>Support with modification</b> to restrict the harvest limit during the January season to two deer.
WP22-13	SCRAC	Deer	6	Add deer to designated hunter list	Requests that deer be removed from the Unit 6 specific designated hunter regulation, allowing any Federally qualified subsistence user to designate another qualified user to harvest deer on their behalf in Unit 6, as is allowed for large mammals in most of the rest of Alaska. Currently, only elderly or disabled hunters may designate another to harvest deer on their behalf in Unit 6.	<b>Support</b>
WP22-25a	Michael Adams	Sheep	7	Establish C&T for Cooper Landing	Requests that the Board recognize the customary and traditional uses of sheep in Unit 7 by residents of Cooper Landing.	<b>Support</b>
WP22-26a	Lisa Slepetski	Sheep	7	Establish C&T for Moose Pass	Requests that the Board recognize the customary and traditional uses of sheep in Unit 7 by residents of Moose Pass.	<b>Support</b>

Proposal	Proponent	Species	Unit	Summary	Issue	Preliminary OSM Conclusion
WP22-25b	Michael Adams	Sheep	7	Establish hunt	Requests establishing a season of Aug. 10 – Sep. 20, with a harvest limit of one Dall sheep and that the Kenai National Wildlife Refuge Manager be delegated authority to open and close the season in consultation with the Alaska Department of Fish and Game (ADF&G) and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council (Council).	<b>Support with modification</b> to establish a Federal drawing permit hunt for sheep in Unit 7 with a harvest limit of one ram with full curl horn or larger, and delegate authority to the Seward District Ranger of the Chugach National Forest to close the season, set the harvest quota, the number of permits to be issued and any needed permit conditions via delegation of authority letter only
WP22-26b	Lisa Slepetski	Sheep	7	Establish hunt	Requests that a Federal subsistence sheep hunt be established in Unit 7.	<b>Take no action</b>
WP22-33	WRST SRC	Black Bear	11, 12	Eliminate sealing requirement	Requests eliminating the sealing requirement for black bear in Units 11 and 12.	<b>Support</b>

Proposal	Proponent	Species	Unit	Summary	Issue	Preliminary OSM Conclusion
WP22-40	BBRAC	wolf, wolverine	9B, 9C, 17B, 17C	Allow use of snowmachines for positioning animals	Requests that Federally qualified subsistence users be allowed to use a snowmachine to position wolves and wolverines for harvest on Federal public lands in Units 9B, 9C, 17B, and 17C, provided the animals are not shot from a moving snowmachine.	<b>Support with modification</b> to utilize the same regulatory language as Proposal WP20-27, and to include all Federal public lands in Unit 17.
WP22-45	ADF&G	Hare	18, 22, 23	Establish season/harvest limit for Alaska hare	Requests to create specific harvest regulations for Alaska hare ( <i>Lepus othus</i> ) in Units 18, 22, and 23.	<b>Support with modification</b> to shorten the season to Aug. 1 – May 31 and to modify the definition of hare in Federal regulations.
WP22-50	NWARAC	Beaver	23	Trapping: Increase harvest limit to 'no limit'	Requests the beaver harvest limit be changed from 50 and 30 beaver in Unit 23, Kobuk and Selawik River drainages and Unit 23 remainder, respectively, to no harvest limit in both trap areas.	<b>Support with modification</b> to combine Unit 23 trap areas.
WP22-53	Heimo Korth	Arctic Fox	25	Establish season/harvest limit	Requests establishing a trapping season for Arctic fox ( <i>Vulpes lagopus</i> ) in Unit 25.	<b>Support</b>



## FISHERIES CLOSURE REVIEWS UNDER CONSIDERATION FOR 2022

The following fisheries closure reviews share these items in common

- Incorporated into Fed Regulations from State Regulations approximately 20 years ago.
- This is the first time they have been reviewed
- All Closures involve waters closed to subsistence fishing while remaining open to other uses, primarily sport fishing.
- And, All have been recommended deferred by the Council, ISC and the Board until further outreach has been attempted in the communities where these regulations occur.

The Federal Subsistence Board relies upon public comments to better inform the decision making process. The Board options during a closure review are Retain, Modify, Rescind, or Defer.

- **Retain** means the closure remains in the regulations, unchanged.
- **Modify** means a change *directly related* to the actual closure. e.g., adjusting the dates the closure is effective, assigning an expiration date, or broadening a closure to both subsistence and non-subsistence users.
- **Rescind** means to remove the closure from the regulations. If a season/harvest limit exists in the regulations, that season/harvest limit will once again become effective. If none exist, a proposal must be submitted to establish a season and/or harvest limits. If no parallel proposal is submitted with the closure review, existing State sport regulations would be followed, as applicable (for fish), or there is no harvest season until a proposal is submitted.
- **Defer** means the closures remain in place until that time the Board takes up the closure again, normally no longer than the next applicable regulatory cycle.

Comments for any of the closure reviews under consideration are encouraged in the following ways:

- 1) Attend Kodiak/Aleutians Subsistence Regional Advisory Council meetings in Cold Bay, AK (September 27-28, 2021) or teleconference line 1-877-807-6997 participant passcode 73803960
- 2) Written comments can be sent to [subsistence@fws.gov](mailto:subsistence@fws.gov)

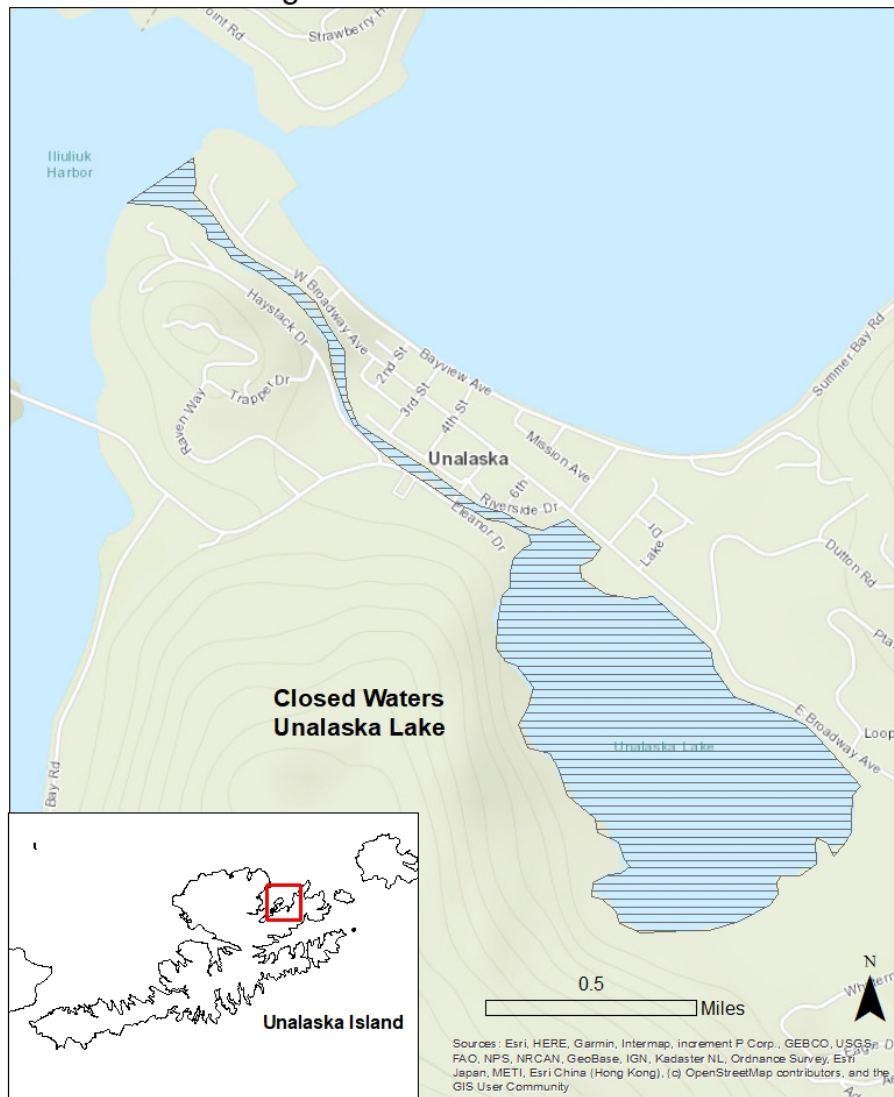
**21-08 Unalaska Lake – Federal subsistence closure to harvesting salmon**

Nearest Communities: Unalaska

Currently, Federally qualified subsistence users cannot subsistence fish for salmon in Unalaska Lake and its tributaries or outlet streams. If no parallel proposal is submitted with the closure review, any existing Federal subsistence or State sport fish regulations would be followed. However, if there are no existing regulations, there is no harvest season until a proposal is submitted.

State Sport Fishing	Federal Subsistence
Open to harvest salmon with rod and reel	Closed to harvest salmon

**Federal Closure Area - Unalaska Lake Including Tributaries and Outlet Streams**



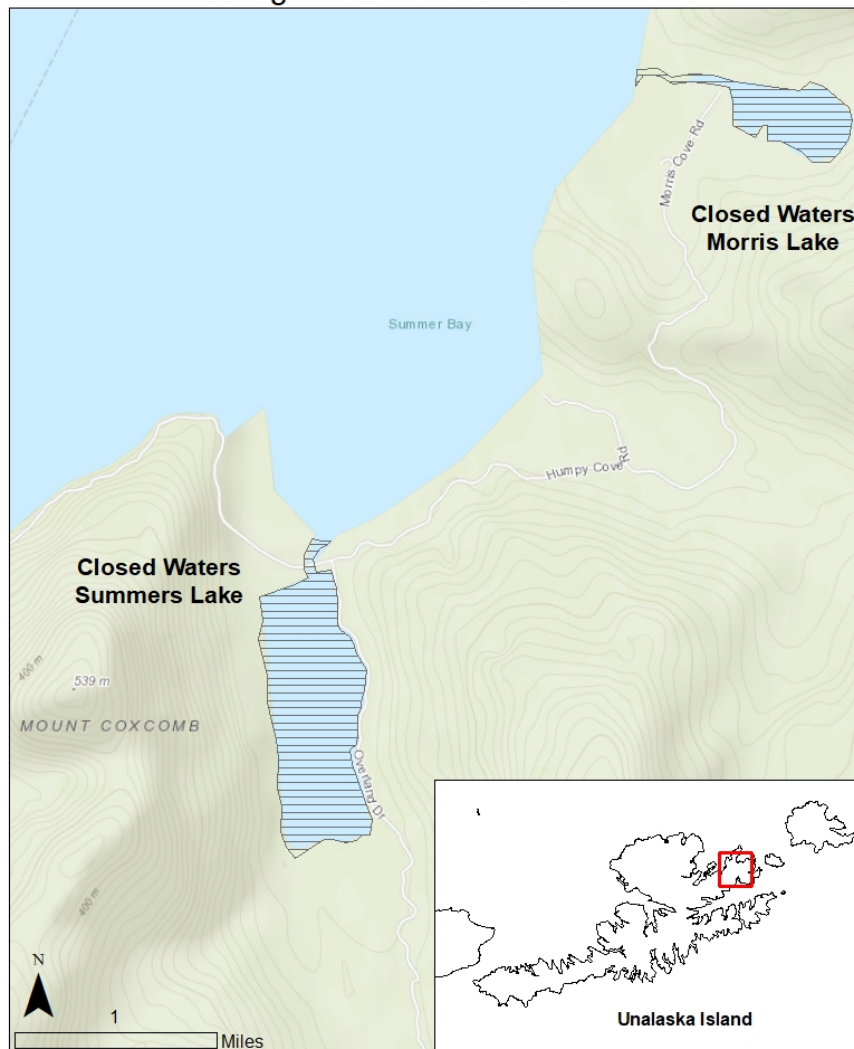
**21-09 Unalaska Bay – Federal subsistence closure to harvesting salmon in Summers and Morris Lake**

Nearest Communities: Unalaska

Currently, Federally qualified subsistence users cannot subsistence fish for salmon in Summers and Morris Lakes including their tributaries and outlet streams. If no parallel proposal is submitted with the closure review, any existing Federal subsistence or State sport fish regulations would be followed. However, if there are no existing regulations, there is no harvest season until a proposal is submitted.

State Sport Fishing	Federal Subsistence
Open to harvest salmon with rod and reel Morris Lake	Closed to harvest salmon
Closed to harvest salmon Summers Lake	

Federal Closure Area - Summers and Morris Lake Including Tributaries and Outlet Streams



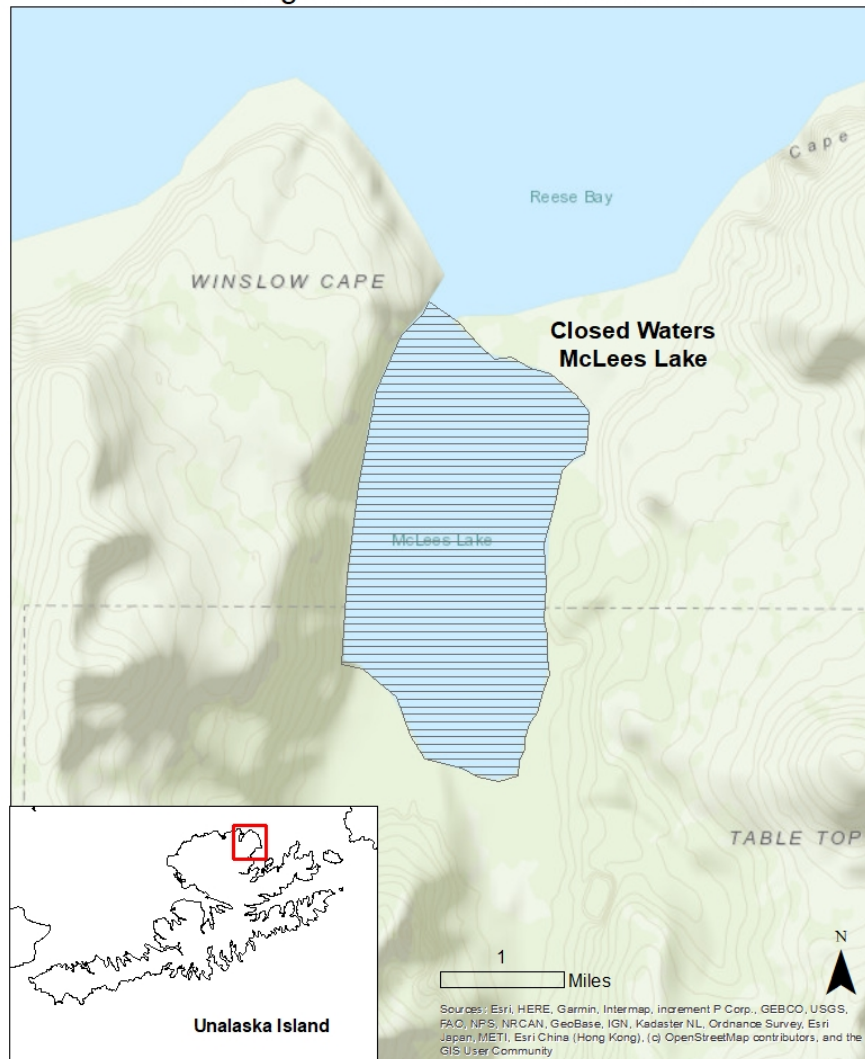
**21-11 Federal subsistence closure to harvesting salmon in McLees Lake drainage**

Nearest Communities: Unalaska

Currently, Federally qualified subsistence users cannot subsistence fish for salmon in the waters of McLees Lake and its tributaries and outlet stream. If no parallel proposal is submitted with the closure review, any existing Federal subsistence or State sport fish regulations would be followed. However, if there are no existing regulations, there is no harvest season until a proposal is submitted.

State Sport Fishing	Federal Subsistence
Open to harvest salmon with rod and reel	Closed to harvest salmon

Federal Closure Area - McClees Lake Including Tributaries and Outlet Stream



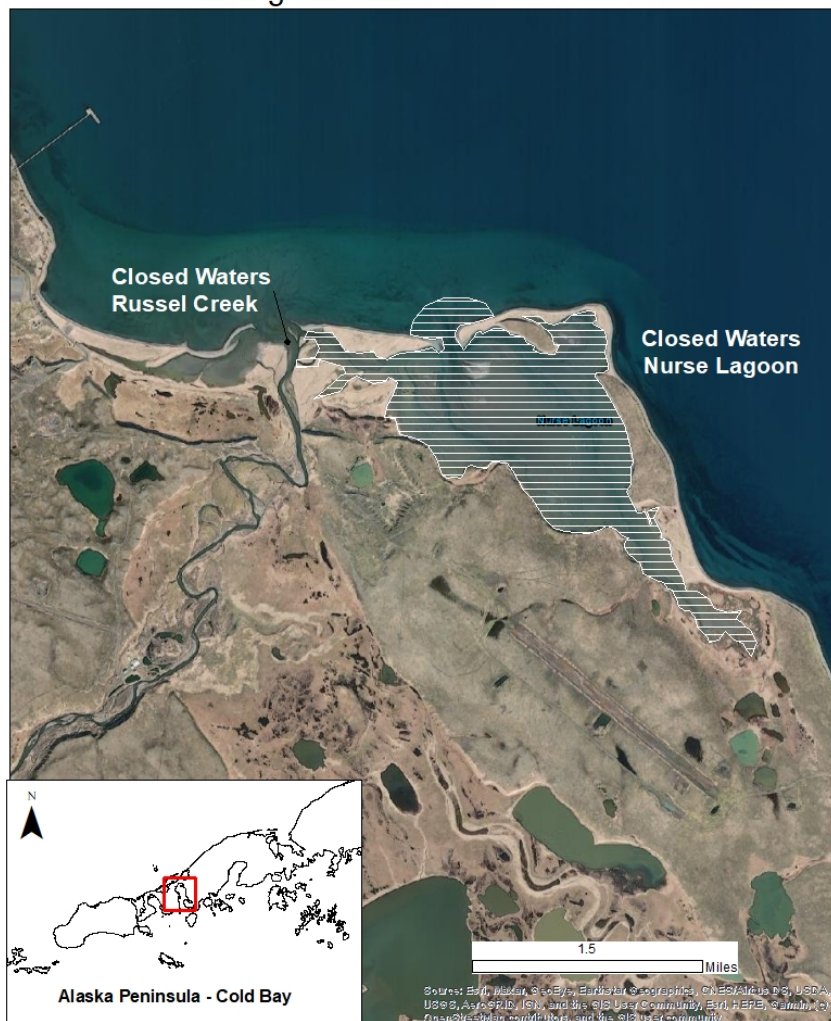
**21-13 Alaska Peninsula – Federal subsistence closure to harvesting salmon in Russel Creek and Nurse Lagoon**

Nearest Communities: Cold Bay

Currently, Federally qualified subsistence users cannot subsistence fish for salmon in Russel Creek and Nurse Lagoon and within 500 yards outside the mouth of Nurse Lagoon. If no parallel proposal is submitted with the closure review, any existing Federal subsistence or State sport fish regulations would be followed. However, if there are no existing regulations, there is no harvest season until a proposal is submitted.

State Sport Fishing	Federal Subsistence
Open to harvest salmon with rod and reel	Closed to harvest salmon

Federal Closure Area - Nurse Lagoon and Russel Creek Including Tributaries and Outlet Stream



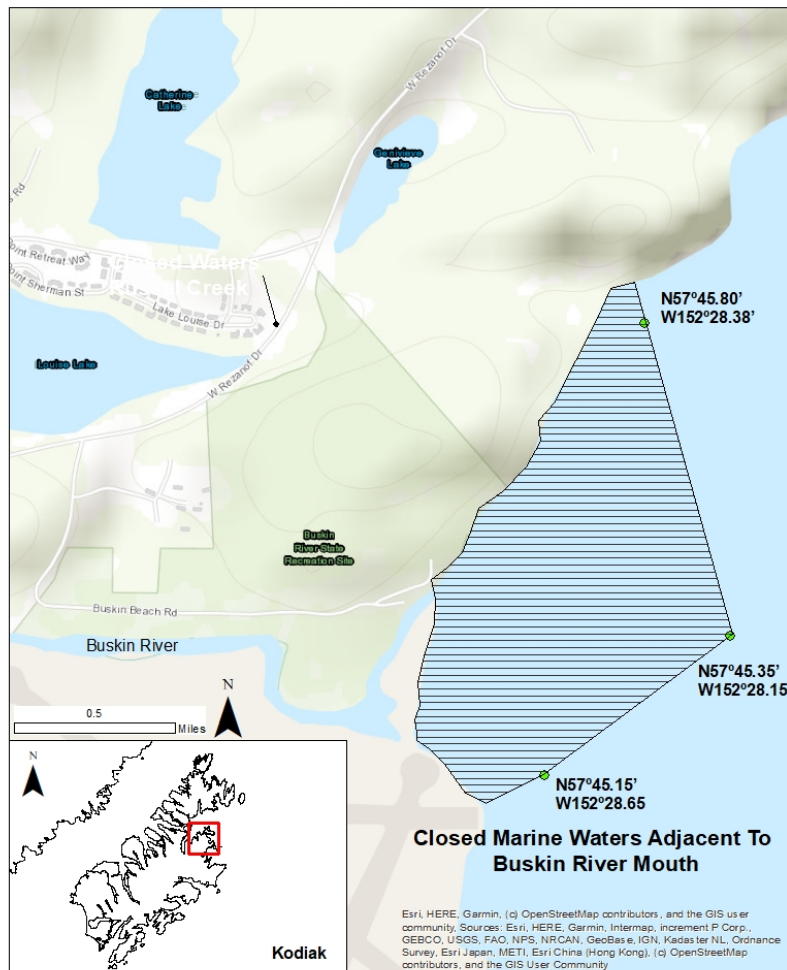
**21-16 Kodiak Island Federal subsistence closure to harvesting salmon in the marine waters near the outlet of the Buskin River**

Nearest Communities: City of Kodiak

Currently, Federally qualified subsistence users cannot subsistence fish for salmon in the closed waters of the Buskin River (All waters inside of a line running from a marker on the bluff north of the mouth of the Buskin River at approximately 57°45.80' North latitude, 152°28.38' West longitude, to a point offshore at 57°45.35' North latitude, 152°28.15' West longitude, to a marker located onshore south of the river mouth at approximately 57°45.15' North latitude, 152°28.65' West longitude. If no parallel proposal is submitted with the closure review, any existing Federal subsistence or State sport fish regulations would be followed. However, if there are no existing regulations, there is no harvest season until a proposal is submitted.

State Sport Fishing	Federal Subsistence
Open to harvest salmon with rod and reel	Closed to harvest salmon

Federal Subsistence Fisheries Closure Area  
Marine Waters Near Buskin River Outlet

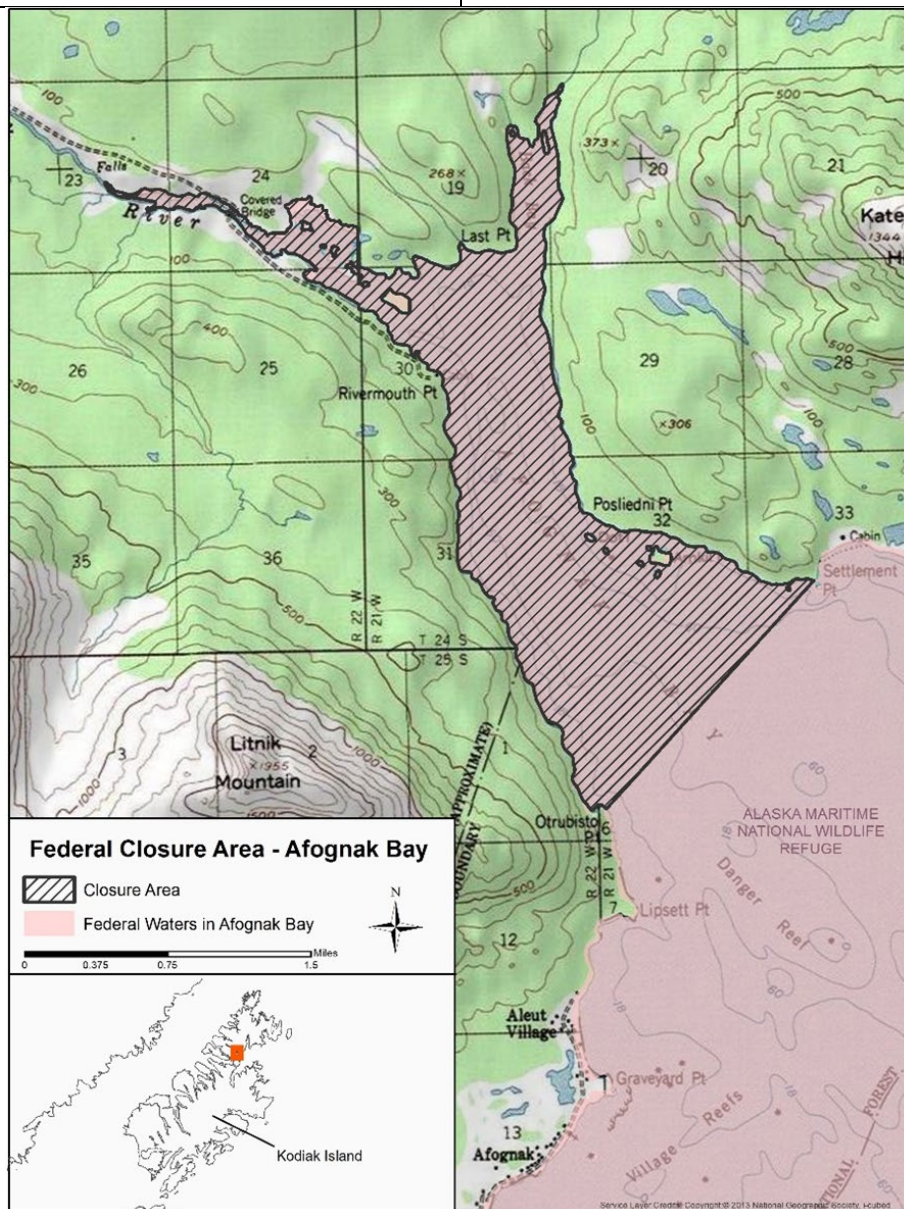


**21-18 Federal subsistence closure to harvesting salmon in the marine waters of Afognak Bay – Salmon**

Nearest Communities: City of Kodiak, Port Lions, Ouzinkie, Afognak Village

Currently, Federally qualified subsistence users cannot subsistence fish for salmon in Afognak Bay north and west of a line from the top of Last Point to the tip of River Mouth Point. If no parallel proposal is submitted with the closure review, any existing Federal subsistence or State sport fish regulations would be followed. However, if there are no existing regulations, there is no harvest season until a proposal is submitted.

State Sport Fishing	Federal Subsistence
Open to harvest salmon with rod and reel	Closed to harvest salmon

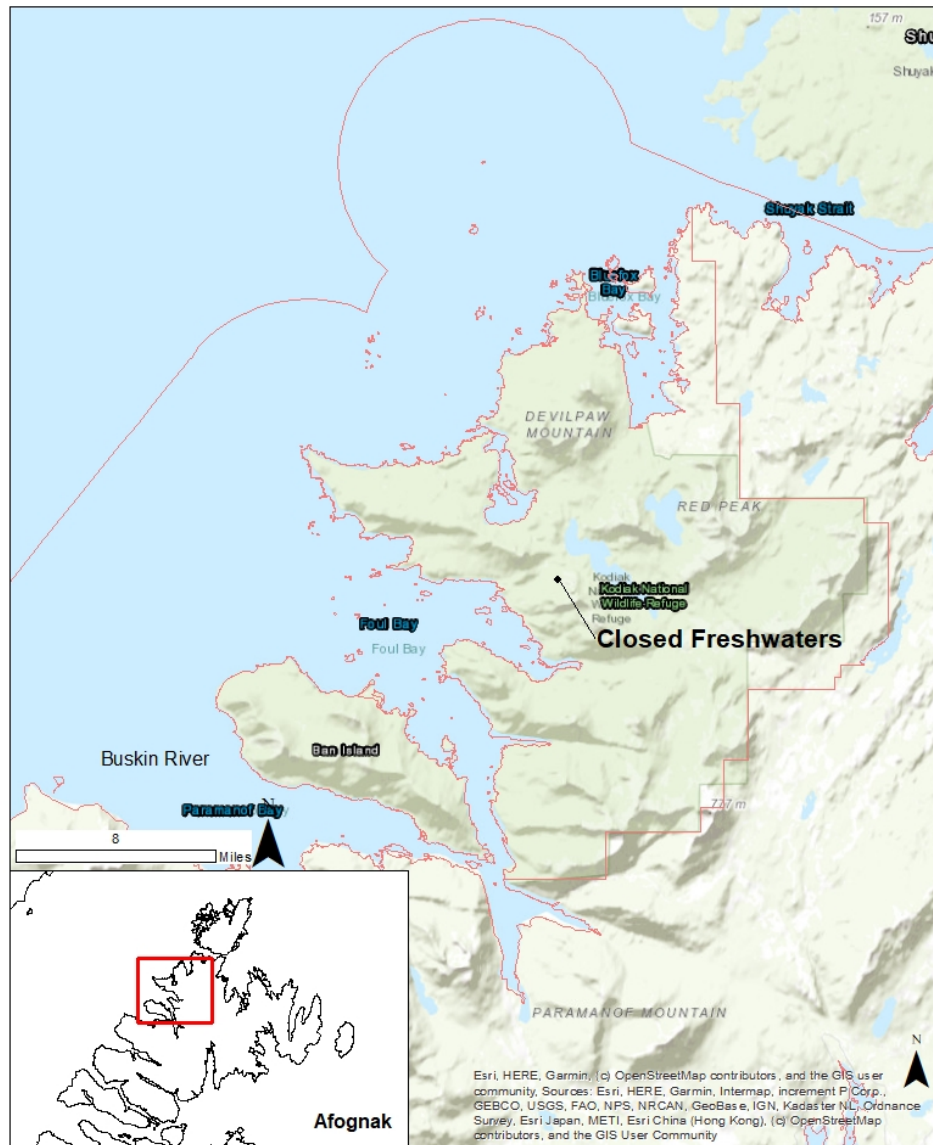


**21-19 Federal subsistence closure to harvesting salmon in the freshwater drainages of Afognak Island**

Currently, Federally qualified subsistence users cannot subsistence fish for salmon in all of the freshwater systems of Afognak Island. If no parallel proposal is submitted with the closure review, any existing Federal subsistence or State sport fish regulations would be followed. However, if there are no existing regulations, there is no harvest season until a proposal is submitted.

State Sport Fishing	Federal Subsistence
Open to harvest salmon with rod and reel	Closed to harvest salmon

Federal Subsistence Fisheries Closure Area  
Freshwaters Afognak Island - Kodiak National Wildlife Refuge





The following fisheries closure reviews will be considered during the next fisheries cycle along with the remaining seven fisheries closure reviews from the 2021 cycle.

**FCR 23-10 Aleutian Islands Unalaska Bay Stream Drainages – Salmon**

You may not subsistence fish for salmon in all streams supporting anadromous fish runs that flow into Unalaska Bay south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point;

**FCR 23-12 Adak and Kagalaska Islands freshwater – Salmon**

You may not fish in all fresh water on Adak Island and Kagalaska Island in the Adak District

**FCR 23-14 Alaska Peninsula – Trout Creek, Salmon**

You may not subsistence fish for salmon in Trout Creek and within 500 yards outside its mouth.

**FCR 23- 19 Kodiak Area – Selief Bay Creek, Salmon**

You may not subsistence fish for salmon in all waters closed to commercial salmon fishing within 100 yards of the terminus of Selief Bay Creek.

**FCR 23-22 Kodiak Area – Little Kitoi Creek, Salmon**

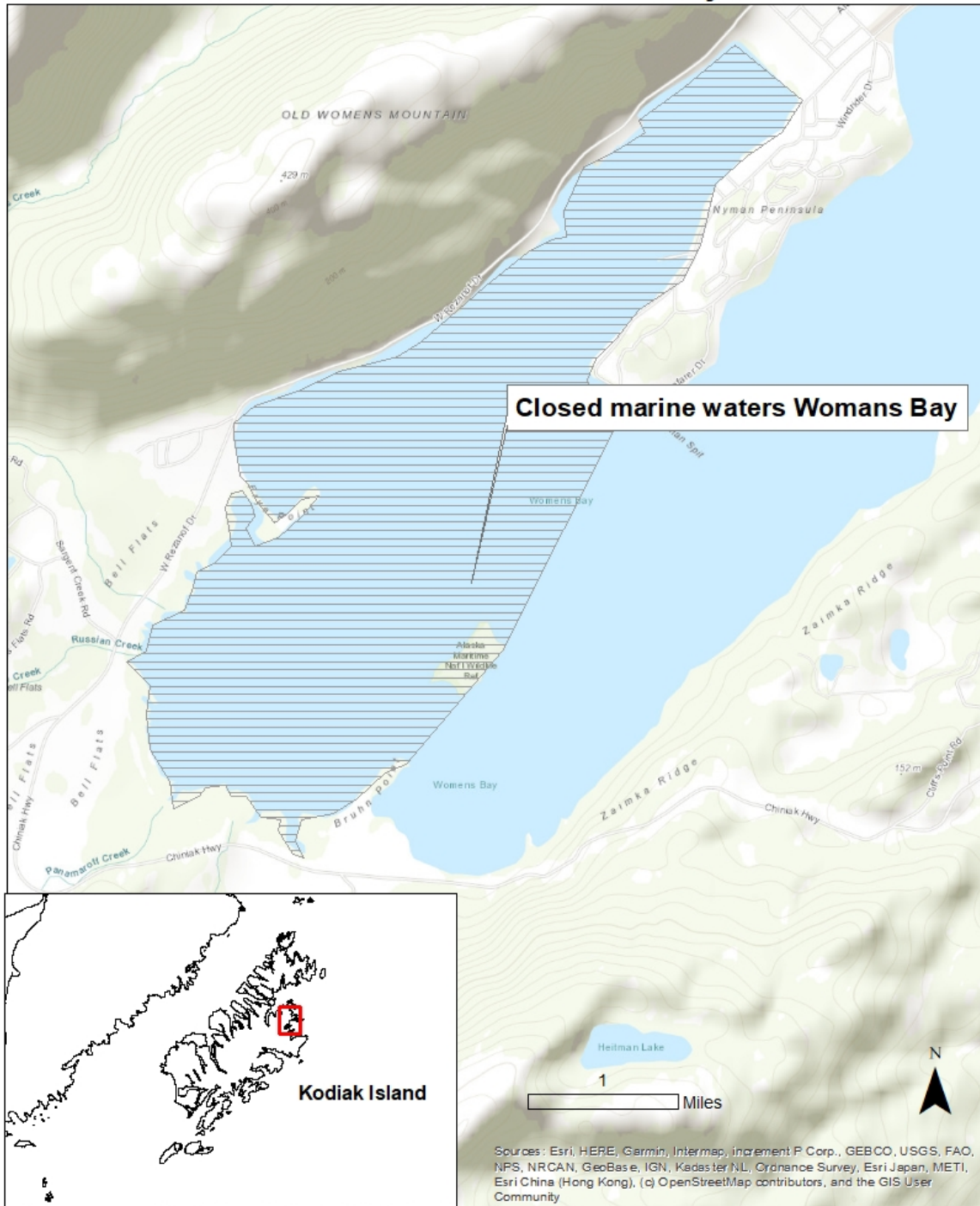
You may not subsistence fish for salmon from August 15 through September 30, in all waters 500 yards seaward of the terminus of Little Kitoi Creek.

**FCR 23-21 Kodiak Area – Marine waters near Karluk River, King Crab**

### FCR 23-15 Kodiak Area – Womans Bay, Salmon

You may not subsistence fish for salmon in the closed waters of Womans Bay.

## Federal Subsistence Fisheries Closure Area Marine Waters - Womans Bay

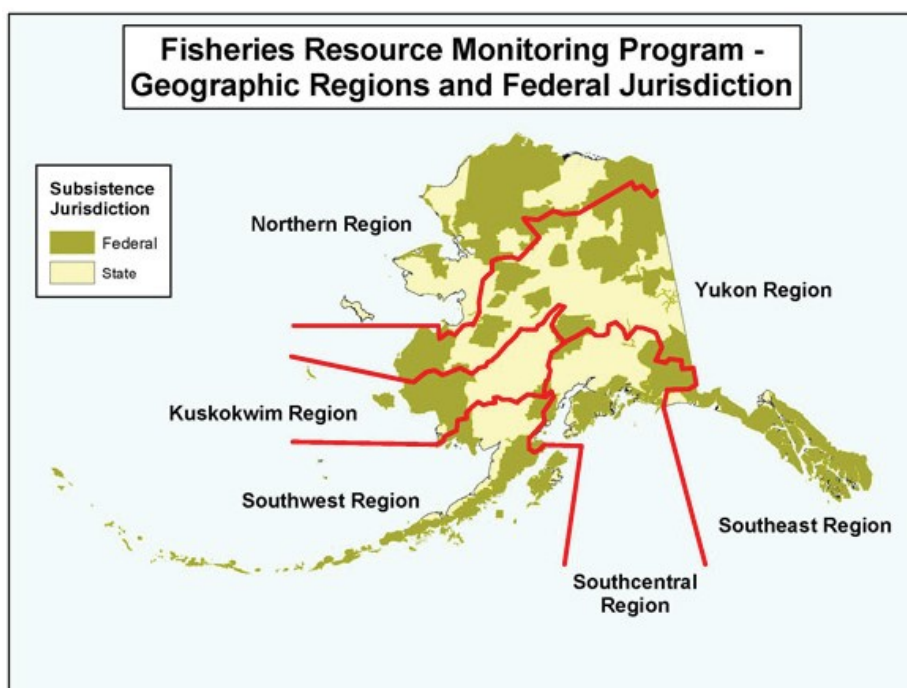


## FISHERIES RESOURCE MONITORING PROGRAM

### BACKGROUND

Section 812 of the Alaska National Interest Lands Conservation Act (ANILCA) directs the Departments of the Interior and Agriculture, cooperating with other Federal agencies, the State of Alaska, and Alaska Native and other rural organizations, to research fish and wildlife subsistence uses on Federal public lands and to seek data from, consult with, and make use of the knowledge of local residents engaged in subsistence. When the Federal government assumed responsibility for management of subsistence fisheries on Federal public lands and waters in Alaska in 1999, the Secretaries of the Interior and Agriculture made a commitment to increase the quantity and quality of information available to manage subsistence fisheries, to increase quality and quantity of meaningful involvement by Alaska Native and other rural organizations, and to increase collaboration among Federal, State, Alaska Native, and rural organizations. The Fisheries Resource Monitoring Program (Monitoring Program) is a collaborative, interagency, interdisciplinary approach to enhance fisheries research and data in Alaska and effectively communicate information needed for subsistence fisheries management on Federal public lands and waters.

Every two years, the Office of Subsistence Management announces a funding opportunity for investigation plans addressing subsistence fisheries on Federal public lands. The 2022 Notice of Funding Opportunity focused on priority information needs developed by the Subsistence Regional Advisory Councils with input from strategic plans and subject matter specialists. The Monitoring Program is administered through regions to align with stock, harvest, and community issues common to a geographic area. The six Monitoring Program regions are shown below.



Strategic plans sponsored by the Monitoring Program have been developed by workgroups of fisheries managers, researchers, Subsistence Regional Advisory Councils, and by other stakeholders for three of the six regions: Southeast, Southcentral (excluding Cook Inlet Area), and Southwest Alaska, and for Yukon and Kuskokwim drainages whitefish (available for viewing at the Monitoring Program webpage at <https://www.doi.gov/subsistence/frmp/plans>). These plans identify prioritized information needs for each major subsistence fishery. Individual copies of plans are available from the Office of Subsistence Management by calling (907) 786-3888 or toll Free: (800) 478-1456 or by email [subsistence@fws.gov](mailto:subsistence@fws.gov). An independent strategic plan was completed for the Kuskokwim Region for salmon in 2006 and can be viewed at the Alaska-Yukon-Kuskokwim Sustainable Salmon Initiative website at <https://www.aykssi.org/salmon-research-plans/>.

Investigation plans are reviewed and evaluated by Office of Subsistence Management and U.S. Forest Service staff, and then scored by the Technical Review Committee. The Technical Review Committee's function is to provide evaluation, technical oversight, and strategic direction to the Monitoring Program. Each investigation plan is scored on the following five criteria: strategic priority, technical and scientific merit, investigator ability and resources, partnership and capacity building, and cost/benefit.

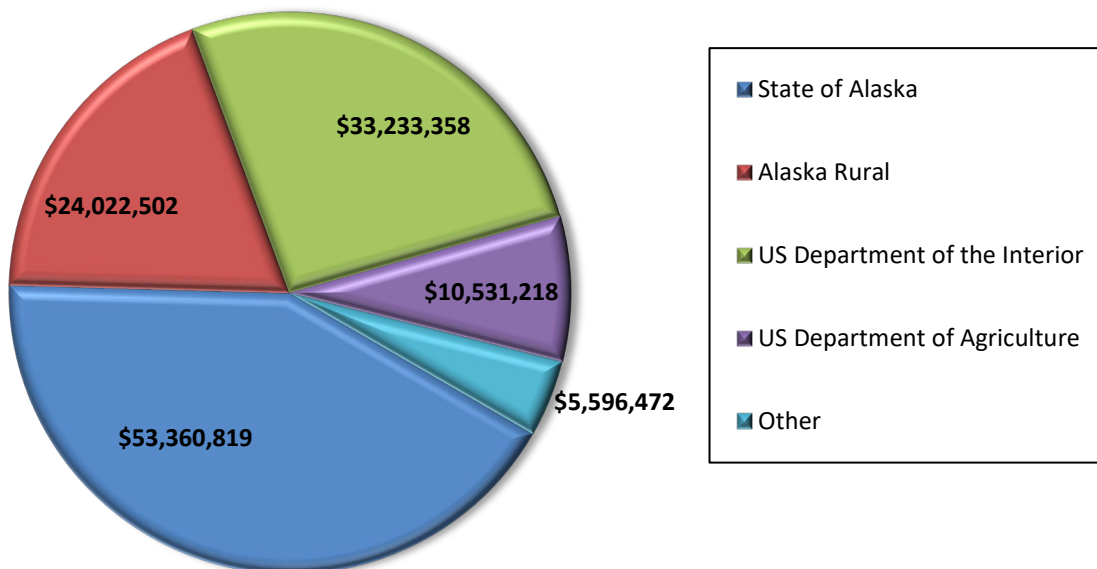
Project executive summaries are assembled into a draft 2022 Fisheries Resources Monitoring Plan. The draft plan is distributed for public review and comment through Subsistence Regional Advisory Council meetings, beginning in September 2021. The Federal Subsistence Board will review the draft plan and will accept written and oral comments at its January 2022 meeting. The Federal Subsistence Board forwards its comments to the Assistant Regional Director of the Office of Subsistence Management. Final funding approval lies with the Assistant Regional Director of the Office of Subsistence Management. Investigators are subsequently notified in writing of the status of their proposals.

## **HISTORICAL OVERVIEW**

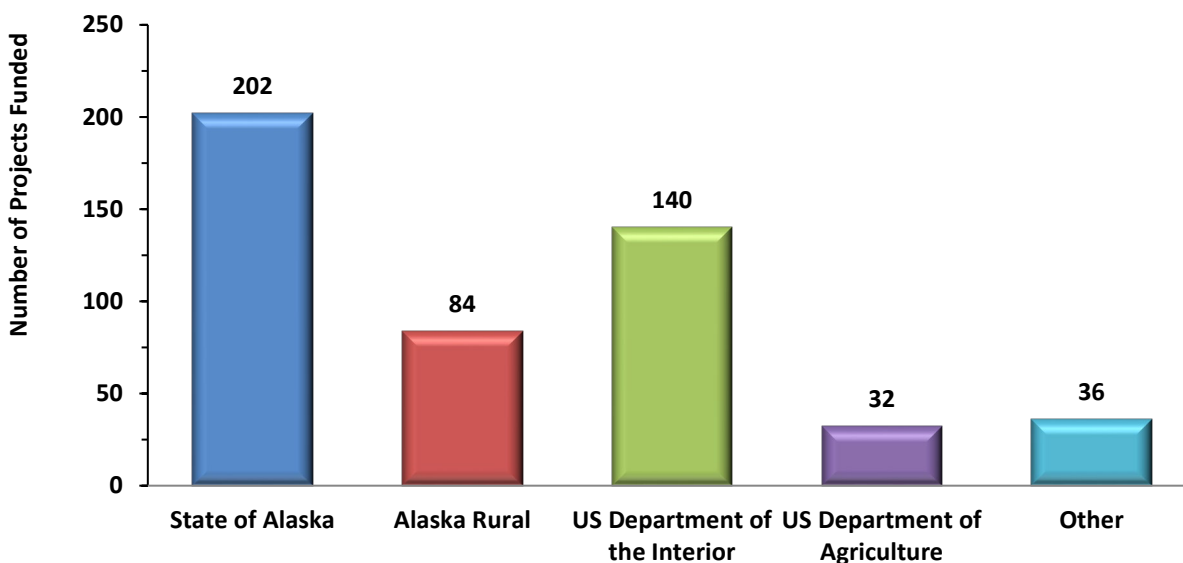
The Monitoring Program was first implemented in 2000 with an initial allocation of \$5 million. Since 2000, a total of \$127 million has been allocated for the Monitoring Program to fund a total of 494 projects (**Figure 1** and **Figure 2**).

During each two-year funding cycle, the Monitoring Program budget funds ongoing multi-year projects (2, 3, or 4 years) as well as new projects. Budget guidelines are established by geographic region (**Table 1**). The regional guidelines were developed using six criteria that included level of risk to species, level of threat to conservation units, amount of subsistence needs not being met, amount of information available to support subsistence management, importance of a species to subsistence harvest, and level of user concerns regarding subsistence harvest. Budget guidelines provide an initial target for planning; however, they are not final allocations and are adjusted annually as needed (**Figure 3**).

**Figure 1. Monitoring Program Funds Distributed, by Organization Type, Since 2000**



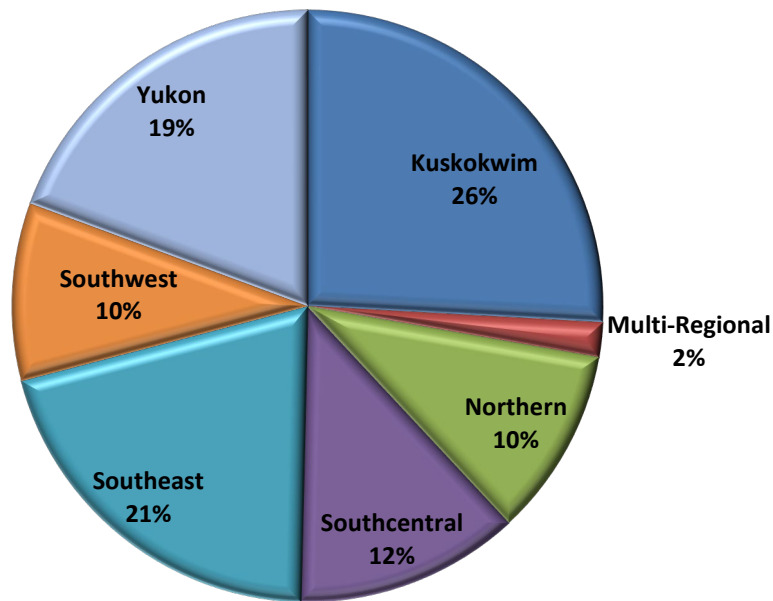
**Figure 2. Number of Monitoring Program Projects Funded, by Organization Type, since 2000**



**Table 1.** Regional allocation guideline for Fisheries Resource Monitoring Program Funds.

Region	U.S. Department of the Interior Funds	U.S. Department of Agriculture Funds
Northern Alaska	17%	0%
Yukon Drainage	29%	0%
Kuskokwim Drainage	29%	0%
Southwest Alaska	15%	0%
Southcentral Alaska	5%	33%
Southeast Alaska	0%	67%
Multi-Regional	5%	0%

**Figure 3. Percentage of Monitoring Program Funding Distributed to Each Region since 2000**



The following three broad categories of information that are solicited for the Monitoring Program: (1) harvest monitoring, (2) traditional ecological knowledge, and (3) stock status and trends. Projects that combine these approaches are encouraged. Definitions of these three categories of information are listed below.

**Harvest monitoring** studies provide information on numbers and species of fish harvested, locations of harvests, and gear types used. Methods used to gather information on subsistence harvest patterns may include harvest calendars, mail-in questionnaires, household interviews, subsistence permit reports, and telephone interviews.

**Traditional ecological knowledge** studies are investigations of local knowledge directed at collecting and analyzing information on a variety of topics such as the sociocultural aspects of subsistence, fish ecology, species identification, local names, life history, taxonomy, seasonal movements, harvests, spawning and rearing areas, population trends, environmental observations, and traditional management systems. Methods used to document traditional ecological knowledge include ethnographic fieldwork, key respondent interviews with local experts, place name mapping, and open-ended surveys.

**Stock status and trends** studies provide information on abundance and run timing; age, size, and sex composition; migration and geographic distribution; survival of juveniles or adults; stock production; genetic stock identification; and mixed stock analyses. Methods used to gather information on stock status and trends include aerial and ground surveys, test fishing, towers, weirs, sonar, video, genetics, mark-recapture, and telemetry.

## **PROJECT EVALUATION PROCESS**

The Monitoring Program prioritizes high quality projects that address critical subsistence and conservation concerns. Projects are selected for funding through an evaluation and review process that is designed to advance projects that are strategically important for the Federal Subsistence Management Program, technically sound, administratively competent, promoting partnerships and capacity building, and are cost effective. Projects are first evaluated by a panel called the Technical Review Committee. This committee is a standing interagency committee of senior technical experts. The Technical Review Committee reviews, evaluates, and makes recommendations about proposed projects that are consistent with the mission of the Monitoring Program. Fisheries and Anthropology staff from the Office of Subsistence Management provide support for the Technical Review Committee. Recommendations from the Technical Review Committee provide the basis for further comments from Subsistence Regional Advisory Councils, the public, the Interagency Staff Committee, and the Federal Subsistence Board, with final approval of the Monitoring Plan by the Assistant Regional Director of the Office of Subsistence Management.

To be considered for funding under the Monitoring Program, a proposed project must have a nexus to Federal subsistence fishery management. Proposed projects must have a direct association to a Federal subsistence fishery, and the subsistence fishery or fish stocks in question must occur in or pass-through waters within or adjacent to Federal public lands in Alaska (National Wildlife Refuges, National Forests, National Parks and Preserves, National Conservation Areas, National Wild and Scenic River Systems, National Petroleum Reserves, and National Recreation Areas). A complete project package must be submitted on time and must address the following five specific criteria to be considered a high-quality project.

1. **Strategic Priorities**—Studies should be responsive to information needs identified in the 2022 Priority Information Needs available at the Monitoring Program webpage at <https://www.doi.gov/subsistence/frmp/funding>. All projects must have a direct linkage to Federal public lands and/or waters to be eligible for funding under the Monitoring Program. To assist in evaluation of submittals for projects previously funded under the Monitoring Program, investigators must summarize project findings in their investigation plans. This summary should clearly and concisely document project performance, key findings, and uses of collected information for Federal subsistence management. Projects should address the following topics to demonstrate links to strategic priorities:

- Federal jurisdiction—The extent of Federal public waters in or nearby the project area
- Direct subsistence fisheries management implications
- Conservation mandate—Threat or risk to conservation of species and populations that support subsistence fisheries
- Potential impacts on the subsistence priority—Risk that subsistence harvest users' goals will not be met
- Data gaps—Amount of information available to support subsistence management and how a project answers specific questions related to these gaps
- Role of the resource—Contribution of a species to a subsistence harvest (number of villages affected, pounds of fish harvested, miles of river) and qualitative significance (cultural value, unique seasonal role)
- Local concern—Level of user concerns over subsistence harvests (upstream vs. downstream allocation, effects of recreational use, changes in fish abundance and population characteristics)

2. **Technical-Scientific Merit**—Technical quality of the study design must meet accepted standards for information collection, compilation, analysis, and reporting. To demonstrate technical and scientific merit, applicants should describe how projects will:

- Advance science
- Answer immediate subsistence management or conservation concerns
- Have rigorous sampling and/or research designs
- Have specific, measurable, realistic, clearly stated, and achievable (attainable within the proposed project period) objectives
- Incorporate traditional knowledge and methods

Data collection, compilation, analysis, and reporting procedures should be clearly stated. Analytical procedures should be understandable to the non-scientific community. To assist in evaluation of submittals for continuing projects previously funded under the Monitoring



Program, summarize project findings and justify continuation of the project, placing the proposed work in context with the ongoing work being accomplished.

3. ***Investigator Ability and Resources***—Investigators must show they are capable of successfully completing the proposed project by providing information on the ability (training, education, experience, and letters of support) and resources (technical and administrative) they possess to conduct the work. Investigators that have received funding in the past, via the Monitoring Program or other sources, are evaluated and scored on their past performance, including fulfillment of meeting deliverable and financial accountability deadlines. A record of failure to submit reports or delinquent submittal of reports will be taken into account when rating investigator ability and resources.
4. ***Partnership and Capacity Building***—Investigators must demonstrate that capacity building has already reached the communication or partnership development stage during proposal development and, ideally, include a strategy to develop capacity building to higher levels, recognizing, however, that in some situations higher level involvement may not be desired or feasible by local organizations.

Investigators are requested to include a strategy for integrating local capacity development in their study plans or research designs. Investigators should inform communities and regional organizations in the area where work is to be conducted about their project plans. They should also consult and communicate with local communities to ensure that local knowledge is utilized and concerns are addressed. Investigators and their organizations should demonstrate their ability to maintain effective local relationships and commitment to capacity building. This includes a plan to facilitate and develop partnerships so that investigators, communities, and regional organizations can pursue and achieve the most meaningful level of involvement. Proposals demonstrating multiple, highly collaborative efforts with rural community members or Alaska Native Organizations are encouraged.

Successful capacity building requires developing trust and dialogue among investigators, local communities, and regional organizations. Investigators need to be flexible in modifying their work plan in response to local knowledge, issues, and concerns, and must also understand that capacity building is a reciprocal process in which all participants share and gain valuable knowledge. The reciprocal nature of the capacity building component(s) should be clearly demonstrated in proposals. Investigators are encouraged to develop the highest level of community and regional collaboration that is practical including joining as co-investigators.

Capacity can be built by increasing the technical capabilities of rural communities and Alaska Native organizations. This can be accomplished via several methods, including increased technical experience for individuals and the acquisition of necessary gear and equipment. Increased technical experience would include all areas of project management including logistics, financial accountability, implementation, and administration. Other examples may include internships or providing opportunities within the project for outreach, modeling, sampling design,

or project specific training. Another would be the acquisition of equipment that could be transferred to rural communities and tribal organizations upon the conclusion of the project.

A “meaningful partner” is a partner that is actively engaged in one or more aspects of project design, logistics, implementation and reporting requirements. Someone who simply agrees with the concept or provides a cursory look at the proposal is not a meaningful partner.

5. **Cost/Benefit**—This criterion evaluates the reasonableness (what a prudent person would pay) of the funding requested to provide benefits to the Federal Subsistence Management Program. Benefits could be tangible or intangible. Examples of tangible outcomes include data sets that directly inform management decisions or fill knowledge gaps and opportunities for youth or local resident involvement in monitoring, research and/or resource management efforts. Examples of possible intangible goals and objectives include enhanced relationships and communications between managers and communities, partnerships and collaborations on critical resource issues, and potential for increased capacity within both communities and agencies.

Applicants should be aware that the Government shall perform a “best value analysis” and the selection for award shall be made to the applicant whose proposal is most advantageous to the Government. The Office of Subsistence Management strives to maximize program efficiency by encouraging cost sharing, partnerships, and collaboration.

## **POLICY AND FUNDING GUIDELINES**

Several policies have been developed to aid in implementing funding. These policies include:

- Projects of up to four years in duration may be considered
- Proposals requesting Monitoring Program funding that exceeds \$215,000 in any one year are not eligible for funding
- Studies must not duplicate existing projects
- Long term projects will be considered on a case-by-case basis

Activities that are not eligible for funding include:

- Habitat protection, mitigation, restoration, and enhancement
- Hatchery propagation, restoration, enhancement, and supplementation
- Contaminant assessment, evaluation, and monitoring
- Projects where the primary or only objective is outreach and education (for example, science camps, technician training, and intern programs), rather than information collection

The rationale behind these policy and funding guidelines is to ensure that existing responsibilities and efforts by government agencies are not duplicated under the Monitoring Program. Land management or regulatory agencies already have direct responsibility, as well as specific programs, to address these activities. However, the Monitoring Program may fund research to determine how these activities affect Federal subsistence fisheries or fishery resources.

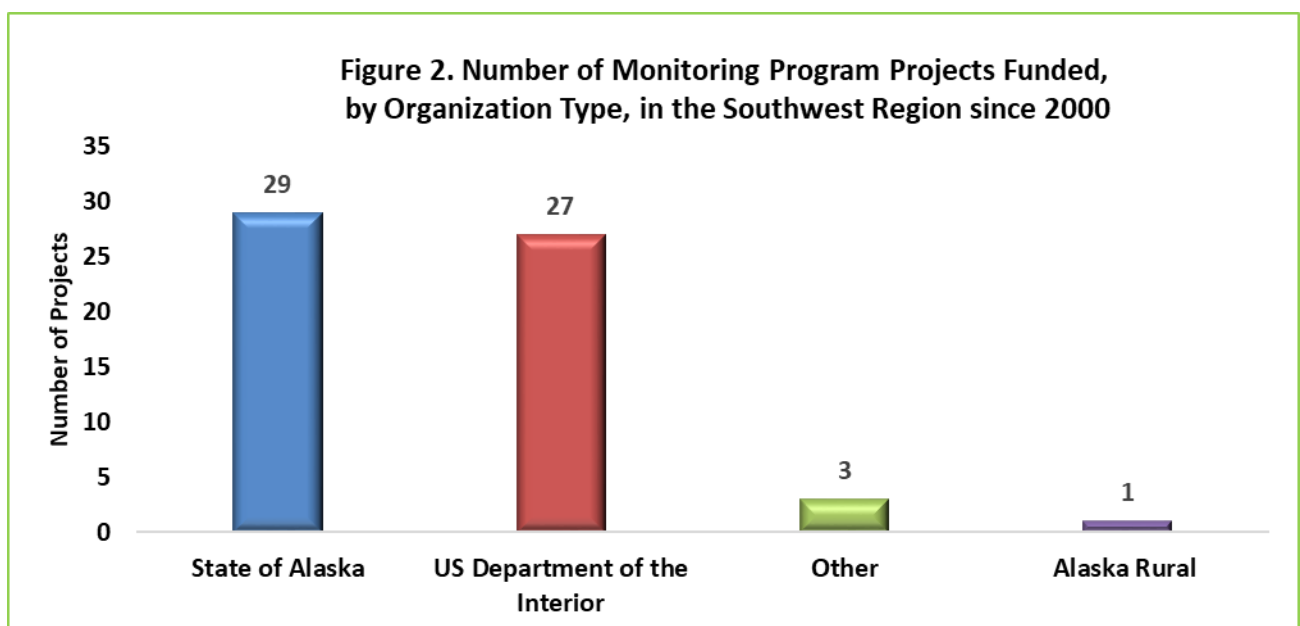
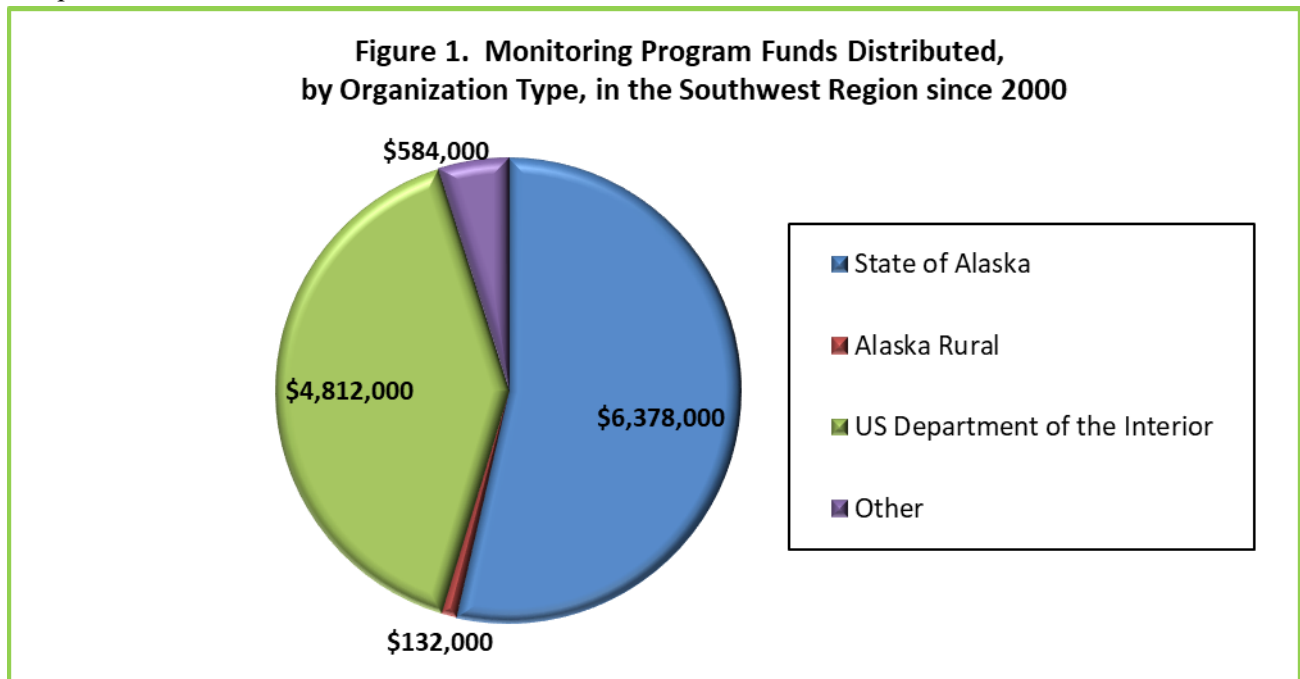
The Monitoring Program may fund assessments of key Federal subsistence fishery stocks in decline or that may decline due to climatological, environmental, habitat displacement, or other drivers; however, applicants must show how this knowledge would contribute to Federal subsistence fisheries management. Similarly, the Monitoring Program may legitimately fund projects that assess whether migratory barriers (e.g., falls, beaver dams) significantly affect spawning success or distribution; however, it would be inappropriate to fund projects to build fish passes, remove beaver dams, or otherwise alter or enhance habitat.

## **2022 FISHERIES RESOURCE MONITORING PLAN**

For 2022, a total of 42 investigation plans were received and all are considered eligible for funding. For 2022, the Department of the Interior, through the U.S. Fish and Wildlife Service, will provide an anticipated \$1.5 million in funding for new projects. The U.S. Department of Agriculture, through the U.S. Forest Service, will provide an anticipated \$750,000 in funding.

### FISHERIES RESOURCE MONITORING PROGRAM SOUTHWEST ALASKA REGION OVERVIEW

Since the inception of the Fisheries Resource Monitoring Program (Monitoring Program) in 2000, a total of 60 projects have been undertaken in the Southwest Alaska Region costing \$11.9 million (**Figure 1**). Of these, the State of Alaska received funds to conduct 27 projects, the Department of the Interior had 27 projects funded, other organizations had 3 projects funded, and an Alaska rural organization had one project funded (**Figure 2**). See **Appendix 1** for more information on Southwest Alaska Region projects completed since 2000.



## **PRIORITY INFORMATION NEEDS**

The 2022 Notice of Funding Opportunity for the Southwest Alaska Region identified the following five priority information needs:

- (Bristol Bay) Reliable estimates of escapement, quality of escapement, and environmental impacts addressing decline of Chinook and Sockeye salmon for the Chignik River area and associated impacts to subsistence harvest opportunities.
- (Bristol Bay) Reliable estimates of Chinook Salmon escapement and evaluation of quality of escapement measures in Alagnak River, Big Creek, Meshik River, Naknek River, and Togiak River, including elements of potential egg deposition, sex and size composition of spawners, and spawning habitat quality and utilization for determining the reproductive potential of spawning stocks.
- (Southwest) Examine how recent changes in the Gulf of Alaska environment affect Sockeye Salmon within their range and habitats, noting particular concern for the Chignik drainages, using scale analyses of fresh water and saltwater growth patterns over multiple years to research changes in growth and survival of salmon in the Kodiak/Aleutians drainages (Buskin, and McClees drainages) and/or in the Bristol Bay/Alaska Peninsula drainages (Chignik, Nushagak, Naknek, and Togiak drainages).
- (Southwest) Reliable estimates of subsistence harvest and uses. Of particular interest are harvest trends in the communities of (Bristol Bay) Manokotak, Nondalton, (Kodiak) Chignik, Ouzinkie, the settlement Aleneva on Afognak Island, Port Lions, (Aleutians/AK Pen), Adak, Akutan, Atka, False Pass, Nelson Lagoon, Nikolski, St. Paul, and St. George.
- (Kodiak/Aleutians) Abundance and assessment of critical subsistence salmon stocks in priority areas such as the Buskin River.

## **AVAILABLE FUNDS**

Federal Subsistence Board guidelines direct initial distribution of funds among regions. Regional budget guidelines provide an initial target for planning. For 2022, the U.S. Department of the Interior and U.S. Department of Agriculture, through the U.S. Fish and Wildlife Service and the U.S. Forest Service, will provide an anticipated \$2.25 million in funding statewide for new projects.

## **ROLE OF THE TECHNICAL REVIEW COMMITTEE**

The mission of the Monitoring Program is to identify and provide information needed to sustain subsistence fisheries on Federal public lands for rural Alaskans through a multidisciplinary and collaborative program. It is the responsibility of the Technical Review Committee to develop the strongest possible funding plan for each region and across the entire state.

For the 2022 Monitoring Program, seven proposals were submitted for the Southwest Alaska Region. The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit (**Table 1**). These scores remain confidential. An executive summary for each proposal submitted to the 2022 Monitoring Program for the Southwest Alaska Region is in **Appendix 2**.

**Table 1.** Projects submitted for the Southwest Alaska Region, 2022 Monitoring Program, including total funds requested and average annual funding requests.

<b>Project Number</b>	<b>Title</b>	<b>Total Project Request</b>	<b>Average Annual Request</b>
22-400	Buskin River Weir	\$490,530	\$122,632
22-401	Chignik River Chinook Escapement	\$601,223	\$150,305
22-402	Lake Clark Sockeye Sonar	\$108,845	\$108,845
22-451	Subsistence Harvest Aleutian AK Peninsula	\$184,905	\$46,226
22-452	False Pass/Nelson Lagoon	\$279,913	\$93,304
22-453	Manokotak Subsistence Salmon Harvest	\$208,382	\$52,096
22-454	Ouzinkie/Port Lions Subsistence Harvest	\$323,870	\$107,957
<b>Total</b>		<b>\$2,197,668</b>	<b>\$1,580,408</b>

## TECHNICAL REVIEW COMMITTEE JUSTIFICATIONS FOR PROPOSAL SCORES

**Project Number:** 22-400

**Project Title:** Buskin River Sockeye Salmon Stock Assessment and Monitoring

**TRC Justification:** This project addresses two of the Priority Information Needs listed in the 2022 Notice of Funding Opportunity for the Southwest Alaska Region and is a continuation of work funded through the Monitoring Program since 2000. The project would continue to provide estimates of Sockeye Salmon spawning escapement into the Buskin River through operation of a weir for four years, and obtain information on residency and traditional fishing sites from subsistence fishery participants. The project has decided to remove the second Lake Catherine/Louise weir that used to be funded under the Monitoring Program. The Sockeye Salmon run to Buskin River supports what is usually the largest subsistence fishery in terms of both harvest and permits issued in the Kodiak Management Area. The ADF&G Kodiak office has a proven record of successfully conducting and completing these past projects. Data collected at this weir since 2000 has been used by the State to assess and modify spawning escapement goals and improve run forecasts. This has allowed State and Federal managers to better manage subsistence harvests and avoid unnecessary restrictions. Past investigators have made strong

efforts to improve capacity building, with impressive results from the high school student intern program. At present, this project has resulted in 23 of 30 former interns returning to work for the Department. While the requested funding for the proposed work appears reasonable to accomplish project objectives, this project, given its long history and being located near the ADF&G Kodiak office and on a road system, should be more efficient and cost effective as time goes by. Adding an underwater video recording system to count fish might greatly reduce costs for future years. Additionally the project could be enhanced by engaging with local tribes to help administer and implement the weir project. The budget does not show the 150-hour contribution from the Kodiak Area Native Association.

**Project Number:** 22-401

**Project Title:** Chignik River Subsistence Harvest Surveys and Escapement Indexing

**TRC Justification:** This is an ambitious project to conduct both a stock, status and trends component using a weir and motion-detection camera equipment to enumerate salmon in the Chignik River, and compare these results to previous years that deployed a different technique using extrapolation. Additionally, the projects third objective addresses a harvest monitoring component by conducting subsistence harvest surveys for the Monitoring Program. Combined, these two approaches directly address two of the Priority Information Needs listed in the 2022 Notice of Funding Opportunity for the Southwest Alaska Region. If successful, this project would advance the techniques deployed to estimate the escapement of salmon in the Chignik River, which has been on a steady decline since 2018 and is beginning to prompt sincere attention towards monitoring, especially during years of low abundance. This proposal also seeks to keep the weir in operation later into the season and capture more of the late-run Sockeye Salmon, which directly addresses the need for ADF&G to manage for subsistence opportunity by ensuring an in-river run goal is met each year for subsistence purposes. In recent years, the weir has been removed in mid- to late-August, making it difficult to determine if the in-river run goals have been achieved.

**Project Number:** 22-402

**Project Title:** Improving Lake Clark Sockeye Salmon Escapement Monitoring in a Changing Climate

**TRC Justification:** This project does not directly address any of the Priority Information Needs listed in the 2022 Notice of Funding Opportunity for the Southwest Alaska Region. Adding a second sonar to this project would allow for a more complete escapement estimate, however with no species apportionment techniques being used and the assumption of no species overlap leaves uncertainty with the estimates. Additionally proper site selection for a sonar is necessary for proper ensonification and the proposal does not indicate a proper site for the sonar has been investigated and no details were given to ensure fish would not be double counted on the second sonar.

**Project Number:** 22-451

**Project Title:** Networks of Net Work: Subsistence Harvest Trends of Aleutian and Alaska Peninsula Communities on Federal Lands and Waters

**TRC Justification:** This four year project directly addresses a Monitoring Program information need by estimating the subsistence harvest and use of wild resources in the Aleutian and Alaska Peninsula communities of Adak, Akutan, Atka, False Pass, Nelson Lagoon, and Nikolski. All six communities were surveyed by Dr. Reedy for the 2010 and 2012 study years, but this proposed project would contribute harvest information consistent with the Community Subsistence Information System, publicly accessible database that summarizes and exports all results from comprehensive subsistence surveys conducted by the Alaska Department of Fish and Game Division of Subsistence. The principal investigator does not represent a rural organization and no co-investigator or agency partnerships are identified. The investigator will work with local organizations to hire and train local research assistants and survey respondents will be remunerated at \$50 per household survey. No work on the proposed study would begin until formal tribal and community approvals are secured.

While the principal investigator has a proven track record of conducting and completing Monitoring Program projects (12-450 & 16-452) and successfully applying ethnographic methodology, the technical and scientific merit of this project is questionable. The goals and objectives are poorly structured and the cost benefit of the project is hard to estimate when all documents provided present a *different* budget total. The Investigation Plan and Budget Narrative claim a project total of \$214,815; the Summary Section of the Budget Table claims a project total of \$184,905; and the Budget Detail presents proposed total costs across each study year that when added together equals \$265,050.

**Project Number:** 22-452

**Project Title:** False Pass and Nelson Lagoon Subsistence Harvest Monitoring and Traditional Ecological Knowledge (TEK) Investigation

**TRC Justification:** This three year project will estimate the subsistence harvest and use of wild resources in False Pass and Nelson Lagoon, evaluate the subsistence salmon permit system, and document local observations of environmental change in order to assess impacts on salmon populations and subsistence activities. The project directly addresses two Monitoring Program priority information needs for 2021 and Federal nexus is provided through the Izembek, Alaska Peninsula, and Alaska Maritime National Wildlife Refuges. The project research design employs proven ethnographic methodologies that are commonly utilized by the Division of Subsistence for most harvest estimate research. For this project investigators will conduct map biographies, participant observation, key respondent interviews, and systematic household surveys. The research design begins with participant observation and mapping biographies which allows the researchers to establish relationships with community members and develop insight into local practice while aiding in the refinement of the survey instrument and key respondent interview questions. Community consultation is integrated throughout most stages of the project design. The average annual cost of the project is reasonable considering the rural location of the communities and the work proposed over a three year period as opposed to four years. Extending the project timeline to allow for a longer timeframe to collect, reduce, and report data is suggested.

The Alaska Department of Fish and Game Division of Subsistence is the principal investigator and no other partnerships are proposed, however letters of support were submitted by the False Pass Tribal Council, Nelson Lagoon Tribal Council, Alaska Department of Fish and Game Division of Commercial



Fisheries, U.S. Fish and Wildlife Service Anchorage Fish and Wildlife Conservation Office, U.S. Fish and Wildlife Service Izembek National Wildlife Refuge, and The Aleutian Pribilof Islands Association.

**Project Number:** 22-453

**Project Title:** Subsistence Harvests and Uses of Salmon and Other Wild Resources in Manokotak, Alaska

**TRC Justification:** This four year project proposes to update harvest estimates and increase understanding of subsistence harvest and use patterns, especially of salmon, by residents of Manokotak within the context of environmental change. The project directly addresses two Monitoring Program Priority Information Needs for 2021 and Federal nexus is provided through the Togiak National Wildlife Refuge. The project research design employs proven ethnographic methodologies that are commonly utilized by the Division of Subsistence for most harvest estimate research. For this project investigators will administer a comprehensive household survey for the calendar year of 2022, map harvest and use areas using Collector for ArcGIS on an iPad, and conduct key respondent interviews. Because key respondent interviews will be conducted at different stages and for different purposes throughout the project, more than the 10 interviews identified are recommended. The cost of the project is more than reasonable for the work proposed across all project years.

This project represents an ongoing partnership between the Alaska Department of Fish and Game and the Bristol Bay Native Association who have successfully completed numerous Monitoring Program projects together over the last 15 years. Both organizations have the capacity to conduct research, meet deadlines, and project deliverables. Significantly, project investigators have already consulted with the Manokotak Village Council on the project design and received letters of support from the Manokotak Nunaniq School, the Manokotak Village Council, and the Togiak National Wildlife Refuge. Project investigators will work closely with the Manokotak Nunaniq School to integrate school age youth into the project and local research assistants will be hired.

**Project Number:** 22-454

**Project Title:** Reliable estimates of subsistence harvests and uses in Ouzinkie and Port Lions

**TRC Justification:** The proposed three-year project would consist of subsistence surveys, subsistence use mapping, and key informant interviews on salmon use in the communities of Port Lions and Ouzinkie. This data has not been collected since 2003 and is vital for Federal subsistence management in the region. Funding for this project would complement ongoing subsistence surveys in other rural communities in the Kodiak Archipelago. This project directly addresses the 2022 Kodiak/Aleutians Priority Information Need. The proposal's objectives are clear, measurable, and achievable. Kodiak National Wildlife Refuge provides Federal nexus. Letters of support were submitted by Ouzinkie Corporation and Ouzinkie and Port Lions tribal councils, as well as Kodiak National Wildlife Refuge.

**APPENDIX 1**  
**PROJECTS FUNDED IN THE SOUTHWEST ALASKA REGION SINCE 2000**

Project Number	Project Title	Investigators
<b>Bristol Bay Salmon Projects</b>		
00-010	Togiak River Salmon Weir	USFWS
00-031	Alagnak River Sockeye Salmon Escapement	ADF&G, NPS, BBNA
00-033	Alagnak River Angler Effort Index	ADF&G, NPS, BBNA
00-042	Lake Clark Sockeye Salmon Assessment	USGS
01-047	Togiak River Subsistence Harvest Monitoring	BBNA, ADF&G, USFWS
01-075	Nondalton Sockeye Salmon and Freshwater Fish TEK	NPS, NTC, USGS
01-095	Lake Clark Sockeye Salmon Escapement	USGS, NTC
01-109	Traditional Ecological Knowledge of Alaska Peninsula/Becharof NWR	ADF&G, BBNA
01-173	Alagnak River Harvest Salmon Escapement Estimation	ADF&G
01-204	Ugashik Lakes Coho Salmon Escapement Estimation	USFWS
03-046	Fisheries Biotechnician Training Program	NPS
04-411	Lake Clark Sockeye Salmon Run Timing	USFWS, BBNA
04-454	Bristol Bay Sharing, Bartering, and Traded of Subsistence Resources	ADF&G, BBNA
05-402	Lake Clark Sockeye Salmon Escapement	NPS, USGS
08-402	Togiak River Chinook Salmon Radio Telemetry	USFWS, BBNA, ADF&G
08-405	Lake Clark Sockeye Salmon Assessment	NPS, USS&E, BBNA
10-402	Togiak River Chinook Salmon Adult Assessment	USFWS, BBNA, ADF&G
16-451	Bristol Bay Subsistence Salmon Networks	ADF&G, BBNA, OSU
16-453	Togiak River Chinook Salmon Subsistence Harvest Assessment	ADF&G, BBNA
<b>Chignik Salmon Projects</b>		
02-098	Kametlook River Coho Salmon Escapement & Carrying Capacity	USFWS, BBNA
02-099	Clark River Estimation of Sockeye and Coho Salmon Escapement	USFWS, BBNA
03-043	Perryville Coho Salmon Escapement	USFWS
05-405	Perryville-Chignik Coho and Sockeye Salmon Aerial Surveys	USFWS
07-404	Perryville-Clark River Coho and Sockeye Salmon Aerial Surveys	USFWS
<b>Bristol Bay-Chignik Freshwater Species Projects</b>		
00-011	Togiak River Dolly Varden Genetic Baseline Development	USFWS
00-012	Bristol Bay Traditional Knowledge of Fish	ADF&G
02-034	Kvichak River Resident Species Subsistence Fisheries	ADF&G, BBNA
04-401	Ungalikthlik and Negukthlik Rivers Rainbow Trout Assessment	USFWS
04-415	Tazimina Rainbow Trout Assessment	ADF&G
05-403	Lake Clark Whitefish Assessment	ADF&G
07-408	Togiak River Rainbow Smelt Assessment	USFWS, BBNA

Project Number	Project Title	Investigators
07-452	Kvichak Watershed Subsistence Fishing Ethnography	ADF&G, BBNA, NPS
12-452	Whitefish Trends in Lake Clark and Iliamna Lake	ADF&G, BBNA, NPS, NTC
<b>Kodiak-Aleutians Projects</b>		
00-032	Buskin River Sockeye Salmon Stock Assessment	ADF&G
01-059	McLees Lake Sockeye Salmon Escapement	USFWS
01-206	Mortenson Creek Sockeye and Coho Salmon Escapement	USFWS
02-032	Lower Alaska Peninsula/Aleutians Subsistence Fish Harvest Assessment	ADF&G, APIA, ISU
03-047	Afognak Lake Sockeye Smolt Enumerations Feasibility	ADF&G
04-402	Mortenson Creek Sockeye and Coho Escapement	USFWS
04-403	McLees Lake Sockeye Salmon Escapement	USFWS
04-412	Afognak Lake Sockeye Salmon Stock Assessment	ADF&G
04-414	Buskin River Sockeye Salmon Stock Assessment	ADF&G
04-457	Kodiak Subsistence Fisheries Harvest and TEK	ADF&G, KANA
07-401	Afognak Lake Sockeye Salmon Smolt Assessment	ADF&G
07-402	Buskin River Sockeye Salmon Weir	ADF&G
07-405	McLees Lake Sockeye Salmon Weir	USFWS, ADF&G, QT
10-401	Afognak Lake Sockeye Salmon Smolt and Adult Assessment	ADF&G
10-403	Buskin River Sockeye Salmon Adult Assessment	ADF&G
10-404	Buskin River Sockeye Salmon Smolt Assessment Feasibility	ADF&G
10-406	McLees Lake Sockeye Salmon Weir	USFWS, ADF&G, QT
12-450	Aleutian Islands Salmon and Other Subsistence Harvests	ISU
12-453	Kodiak Salmon Fishery Changing Patterns	ADF&G
14-401	Buskin River Sockeye Salmon Stock Assessment	ADF&G
14-402	Afognak Lake Sockeye Salmon Stock Assessment	ADF&G
16-452	Western Gulf of Alaska Salmon and Other Harvests	ISU
18-400	Buskin River Sockeye Salmon Stock Assessment and Monitoring	ADF&G
18-450	Unalaska Fish Harvest Practices	ADF&G
18-451	Subsistence Harvest Trends of Salmon and Nonsalmon Fish in 4 Southern Kodiak Island Communities	ADF&G
20-400	McLees Lake Sockeye Salmon Escapement	ADF&G/QT
20-450	Kodiak Road System Subsistence Salmon and Nonsalmon	ADF&G

Abbreviations used for investigators are: **ADF&G** = Alaska Department of Fish and Game, **APIA** = Aleutian-Pribilof Islands Association, **BBNA** = Bristol Bay Native Association, **ISU** = Idaho State University, **KANA** = Kodiak Area Native Association, **NPS** = National Park Service, **NTC** = Nondalton Tribal Council, **OSU** = Oregon State University, **QT** = Qawalangin Tribe, **USFWS** = U.S. Fish and Wildlife Service, **USGS** = U.S. Geological Survey, **USS&E** = U.S. Science and Education, and **UW** = University of Washington.

**APPENDIX 2  
EXECUTIVE SUMMARIES**

The following executive summaries were written by principal investigators and were submitted to the Office of Subsistence Management as part of proposal packages. They may not reflect the opinions of the Office of Subsistence Management or the Technical Review Committee. Executive summaries may have been altered for length.

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<b>Project Number:</b>	22-400			
<b>Title:</b>	Buskin River Sockeye Salmon Stock Assessment and Monitoring			
<b>Geographic Region:</b>	Southwest			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Mark Witteveen, Alaska Department of Fish and Game Kelly Krueger, Alaska Department of Fish and Game			
<b>Project Cost:</b>	<b>2022:</b> \$64,261	<b>2023:</b> \$129,903	<b>2024:</b> \$118,935	<b>2025:</b> \$177,431
<b>Total Cost:</b>	\$490,530			

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**Issue Addressed:** This proposal seeks funding to operate a fish enumeration weir on the Buskin River in Kodiak, Alaska. The Buskin River supports a federal subsistence fishery occurring within the Alaska Maritime National Wildlife Refuge which annually harvests relatively large numbers of sockeye salmon during May, June, and July. Salmon from the Buskin River drainage have been identified by the Federal Subsistence Board as a resource important for customary and traditional use by the residents of Kodiak. Annual operation of a salmon escapement weir at the Buskin Lake outlet will ensure that maximum harvest opportunities for federal subsistence users are sustained.

**Objectives:**

1. Census the sockeye salmon escapement into Buskin Lake from approximately May 15 to July 31.
2. Estimate the age composition of the sockeye salmon run to Buskin Lake such that the estimates are within 7.5 percentage points of the true value 95% of the time.
3. Measure sockeye salmon scales for freshwater and saltwater growth phases.
4. Update the Buskin River brood table and reevaluate the sockeye salmon BEG.
5. Provide education and career development opportunity for Alaska Natives and federally qualified subsistence users.

**Methods:** Sockeye salmon escapement will be enumerated annually through a weir at the outlet of Buskin Lake from May 15 through July 31. Fishery management actions taken in season affecting subsistence, sport, and commercial fisheries will be based on comparison of cumulative weir counts to historical time of entry in order to project run strength and total escapement. Additionally, sockeye salmon will be sampled for age, sex and length (ASL), providing estimates of return by age for the Buskin River Watershed. Analyses of the return and age data collected since 1993 have allowed development of a brood table with estimates of total return having a relative precision of about 10%. Continued collection of age data at this level of sampling will allow for continuation of the brood table and future re-evaluation of the BEG. Scales will be measured as a surrogate for fish growth during

different life phases and measurements will be correlated with climate indices and improved forecasting resolution will be explored.

**Partnerships/Capacity Building:** During each year of the project ADF&G will continue a high school student internship program established in 2003 to provide education and career development opportunity for federally qualified subsistence users. Student interns recruited locally for the project will gain knowledge important to their academic and career development by learning the principles involved in fisheries management and research and obtaining hands-on experience in fisheries data collection methods and techniques. The ADF&G and Kodiak National Wildlife Refuge office of the U.S. Fish and Wildlife Service (USFWS) have established a cooperative agreement to utilize the Buskin River weir as an educational tool for the service's 'Summer Science and Salmon Camp' program, which provides a science-based venue for local youths to learn the importance of salmon for subsistence and other uses comprising an integral part of the Kodiak lifestyle.

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<b>Project Number:</b>	22-401
<b>Title:</b>	Chignik River Subsistence Harvest Surveys and Escapement Indexing
<b>Geographic Region:</b>	Southwest
<b>Data Types:</b>	Stock Status and Trends, Harvest Monitoring and Traditional Ecological Knowledge
<b>Principal Investigator:</b>	Reid Johnson, Alaska Department of Fish and Game (ADFG)
<b>Co-investigator:</b>	Frank Harris, US Fish and Wildlife Service (USFW) George Anderson, Chignik Intertribal Coalition (CIC).
<b>Project Cost:</b>	<b>2022:</b> \$153,671 <b>2023:</b> \$148,080 <b>2024:</b> \$149,446 <b>2025:</b> \$150,026
<b>Total Cost:</b>	\$601,223

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**Issue Addressed:** This project focuses on two of the identified priority information needs for the Southwest Region of the 2022 Fisheries Resource Monitoring Plan Priority Information Needs:

- 1) Reliable estimates of escapement, quality of escapement, and environmental impacts addressing Chinook and sockeye salmon stock declines in the Chignik River area and associated impacts to subsistence harvest opportunities.
- 2) Reliable estimates of subsistence harvest and uses. Of particular interest are harvest trends in the Bristol Bay communities of Manokotak and Nondalton, the Chignik area, and the Kodiak area communities of Ouzinkie, the settlement Aleneva on Afognak Island, and Port Lions, and the Aleutians and Alaska Peninsula area communities of Adak, Akutan, Atka, False Pass, Nelson Lagoon, Nikolski, St. Paul, and St. George.

Recent returns of both sockeye and Chinook salmon to Chignik River have been below established escapement goals. Salmon escaping into the Chignik River water shed are enumerated at the Chignik River weir, operated by ADF&G. Ten-minute expanded counts are used to index escaping salmon; a 10-minute count is conducted every hour and multiplied by six to obtain an hourly escapement index. This method has been shown to be reliable for sockeye salmon indexing when compared to a complete census, as sockeye salmon pass in large numbers, and individual observation events (a single fish passing) number in the hundreds of thousands per year. Chinook salmon observation events are much rarer, with yearly individual observation events per year usually numbering in the hundreds. Expanded counts for Chinook salmon may lack both precision and accuracy.

Subsistence harvest estimates are lacking in the Chignik Area. Surveys conducted by ADF&G in 2012 indicate that 61 Chinook salmon were harvested for subsistence, however state subsistence permits only

indicate that 37 Chinook salmon were harvested. Federally qualified subsistence users (FQSU) are issued on average three federal subsistence permits a year, and the reported harvested per year on federal subsistence permits varies from between zero to five. Subsistence fish harvest is likely going underreported due to lack of knowledge of reporting requirements, lack of access to subsistence permits, or both.

ADF&G is mandated to manage for subsistence opportunity by ensuring an in-river run goal (IRRG) is met each year for subsistence purposes. The IRRG mandates that 10,000 sockeye salmon must escape past the weir specifically for subsistence purposes in both August and September (20,000 sockeye salmon). In recent years, the weir has been removed in mid- to late-August, making it difficult to determine if the IRRG has been met in August and September.

### **Objectives:**

The overall goal of this project is to obtain better escapement indices for Chinook salmon, escapement metrics (age, sex, and length information) for Chinook and sockeye salmon into late August, and subsistence harvest information from FQSU fishing in federal waters of the Chignik area. The specific objectives are:

1. Enumerate all Chinook salmon that pass through the Chignik River weir during the central 80% of the Chinook salmon run using video cameras and FishTick™ software. These counts will be compared to the traditional method of enumerating salmon (10-minute expansion).
2. Extend operation of the Chignik River weir, counting Chinook, sockeye, pink, coho, and chum salmon from August 1 to the latest date possible to obtain the most accurate estimate of escapement and provide the maximum number of observations. Exact removal date will be determined by tidal height. Extending the weir operations will also allow ADF&G staff to continue collecting metrics from both Chignik River Chinook and sockeye salmon.
3. Collect in-season federal subsistence harvest data from FQSU in the Chignik area from mid-June - November using a Chignik area local hire.

**Methods:** Objective 1: From approximately June 20 through approximately August 15 all Chinook salmon that pass through the Chignik River weir will be recorded 24-hours a day using an underwater video camera and lights. Computer software (FishTick™) will examine the video recordings and provide a complete census of Chinook salmon passage. This complete computer-generated census will be compared to both the standard 10-minute expanded counts, and a complete video census conducted by an ADF&G employee using linear regression.

Objective 2: The operation of the Chignik River weir will be extended as late as possible into August to provide the most information possible about the end of the sockeye salmon run at Chignik River, as well as other species. Indexing of escaping salmon will continue through this time, as will weekly sampling; a minimum of 240 sockeye salmon will be sampled weekly, and Chinook salmon will be sampled opportunistically. Age, sex, and length information will be collected from sampled fish. Age, sex, and length information will be collected in accordance with published ADF&G operational plans for escapement sampling.

Objective 3: To obtain reliable estimates of subsistence salmon harvested in federally managed waters, the USFWS and the CIC will partner to hire and train a seasonal fisheries technician. This technician will be trained to issue federal subsistence permits to qualified subsistence users, and will conduct weekly surveys from May through November, interviewing FQSU about subsistence harvest effort.

**Partnership and Capacity Building:** ADF&G, the CIC, and USFWS are committed to the project to develop a robust partnership with goals to provide real time data to federal and state in-season managers.

This project promotes partnership and capacity building in two ways:

1. Direct employment and training opportunities for rural Alaskans working on fisheries monitoring and assessment projects.
2. Providing valuable in-season Federal subsistence harvest data from willing participants.

The USFWS will work with the Chignik Coalition and ADF&G to develop a harvest monitoring sampling plan that will meet the needs of all parties involved. The Chignik Coalition will be a valuable partner for defining how sampling can be completed without disrupting local harvest patterns and use.

The Chignik Coalition will play a key role in this project. Without their partnership and experience in the area it would be difficult for the USFWS to be able to collect the harvest information in a timely manner. The employee hired by the Chignik Coalition will have local connections with the village, which will help allowed weekly collection of FQSU harvest information; a USFWS technician would have more difficulty gathering subsistence harvest information. The coalition will gain experience in managing employees in these types of projects and will be better suited to compete for funding of similar projects in the future.

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<b>Project Number:</b>	22-402			
<b>Title:</b>	Improving Lake Clark Sockeye Salmon Escapement Monitoring in a Changing Climate			
<b>Geographic Region:</b>	Southwest			
<b>Data Types:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Dan Young, Lake Clark National Park and Preserve (NPS)			
<b>Co-investigator:</b>	Krista Bartz, National Park Service (NPS)			
<b>Project Cost:</b>	<b>2022:</b> \$108,845	<b>2023:</b> \$0	<b>2024:</b> \$0	<b>2025:</b> \$0
<b>Total Cost:</b>	\$108,845			

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**Issue Addressed:** This project proposes to improve monitoring of the Newhalen/Lake Clark Sockeye Salmon escapement by expanding sonar coverage. The Lake Clark drainage is located within the federally managed Lake Clark National Park and Preserve (LACL), and Sockeye Salmon are the most important subsistence resource for federally qualified subsistence users in the area. Escapement monitoring on the Newhalen River was previously funded by the Office of Subsistence Management from 2000 to 2011 and is currently funded by the National Park Service. Obtaining reliable estimates of spawning escapement over time is the number one priority identified by the Subsistence Fisheries Resource Monitoring Program for Bristol Bay and specifically identified for Lake Clark stocks in most years. Expanding sonar coverage will provide a more reliable estimate of the Newhalen/Lake Clark escapement, especially during years with poor water clarity (e.g., 2009 and 2019 when counts were stopped because of poor visibility). Further, this project will provide equipment that will be used by LACL in the future to monitor this important subsistence resource. Project deliverables will include presentations to LACL Subsistence Resource Commission and Bristol Bay Regional Advisory Council, a progress, annual, and final report, providing data on daily and annual Lake Clark escapements, return time, comparison between methodologies, and Sockeye Salmon age and size composition. This information will be used to evaluate current stock status and trends and assess whether escapement is adequate to meet subsistence needs.

**Objectives:**

1. Estimate Lake Clark Sockeye Salmon escapement
2. Compare escapement estimates from tower and sonar counts and assess relationships with environmental co-variates
3. Determine age, sex, and length of the Lake Clark Sockeye Salmon escapement

**Methods:** Sockeye salmon will be counted as they ascend the Newhalen River. Standard ADF&G counting tower and sonar protocols will be used to enumerate fish. Age and size data will be collected from sockeye salmon in collaboration with the subsistence community of Nondalton.

**Partnerships and Capacity Building:** The LACL Natural Resources Program has an established history of partnerships and capacity building. Please review FIS files from past projects for the history of communications and collaborations. Our program is dedicated to improving management of subsistence fisheries by providing data on status and trends of sockeye salmon to subsistence users and managers in the region. Our capacity building efforts have focused on education and job opportunities related to sockeye salmon and dissemination of acquired information to all stakeholders. Since 2004, we have intermittently partnered with Bristol Bay Native Association to assist with the hiring, recruitment, and training of local residents on our projects.

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<b>Project Number:</b>	22-451			
<b>Title:</b>	Networks of Net Work: Subsistence Harvest Trends of Small-Scale Aleutian and Alaska Peninsula Communities			
<b>Geographic Region:</b>	Southwest			
<b>Data Types:</b>	Harvest Monitoring/Traditional Ecological Knowledge/Harvest Trends			
<b>Principal Investigator:</b>	Dr. Katherine Reedy, Department of Anthropology, Idaho State University			
<b>Project Cost:</b>	<b>2022:</b> \$47,943	<b>2023:</b> \$65,935	<b>2024:</b> \$52,653	<b>2025:</b> \$48,284
<b>Total Cost:</b>	\$214,815			

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**Issue Addressed:** This proposal addresses the *Priority Information Needs* identified in the Southwest Alaska section of the 2022 Notice of Funding Opportunity for reliable estimates of subsistence harvests, uses, and harvest trends in the Aleutian and Alaska Peninsula communities of Adak, Akutan, Atka, False Pass, Nelson Lagoon, and Nikolski. This project will address the harvest of all wild resources in these communities, provide reliable estimates of subsistence harvests and uses, examine trends in species use using data from previous surveys, characterize sharing networks of resources, access issues, sport activities, community needs, economic trends, and climatic and other environmentally associated factors. This is a relatively under-documented region of Alaska but a critical area where residents regularly engage with resource management conflicts, federal fishery fleets, climatic events, management changes, and other natural resource issues for which current data can assist local and managerial decision-making processes.

This project focuses on the smaller communities (<50 households each) that are vulnerable to a number of forces out of direct local control. These villages’ populations have been in flux or steady decline. Young families might lose incentive to remain in the communities without viable schools (due to the state enrollment requirement), healthy access to wild foods, and a supportive economy. Households have reported diverse subsistence strategies but increasing difficulty accessing certain foods because of climate change, quality of the foods, costs, equipment failures, health, work schedules, among many factors. Current subsistence harvest data is needed because of the changing nature of the environment and communities themselves.



**Objectives:** The overarching goals of this project are to document subsistence harvest estimates and track trend data for each community to capture change through time. Other goals are to understand social networks of food harvesting and sharing, and how these data can be useful to communities and management. Environmental changes, socioeconomic issues, and other factors influencing access to subsistence will also be investigated. The objectives are:

1. Gather harvest estimates, methods, context, and locations of all subsistence species in the study communities for calendar year 2022 or a recent 12-month period.
2. Explore sharing and distribution patterns of species and products between individuals, households, and communities. Use social networks of wild food exchange to model sustainability and resilience of households and communities. Provide Federal subsistence managers with a description and analysis of this social map of harvesting and demonstrate how models can support subsistence allocations and management.
3. Determine, using all available qualitative and quantitative data, trends in harvesting, access, and uses over time.
4. Discover and investigate local subsistence related priorities set forth by communities, for example, a proposed new caribou management plan for Adak Island.
5. Contextualize subsistence fisheries in the broader regional economy, emphasizing the portion on Federal lands and waters.
6. Discover community subsistence concerns, observed changes in species abundances and locations, and observed environmental/climatic changes. Significant changes in the Bering Sea and Aleutian Islands in fisheries, climate, salinity, primary productivity, temperature, sea ice distribution, invasive species, among many, require fresh quantitative and qualitative data on the role of these changes to subsistence users.
7. Project environmental scenarios and demographic conditions to forecast potential strength and weaknesses of human communities. The production of these data is of strategic importance for local people when positioning themselves for future harvest access.

**Methods:** The project will secure permissions from each of the six study communities, meet with community leadership to discuss and modify priorities and objectives as needed, conduct household level comprehensive surveys and interviews in each community (estimated at 158 total households) that document subsistence harvesting, sharing, household economics, and environmental observations. It will also map spatial harvest and use data. Sharing networks of wild foods and labor will be documented and examined for strengths and vulnerabilities to offer a richer understanding of subsistence dynamics. These data will be compared to subsistence data from previous studies in the region to examine trends. Interviews will also document observed and experienced trends, community subsistence concerns.

**Partnerships/Capacity Building:** The PI and assistants will work through the tribal councils and city authorities in each community to refine objectives and methods. The PI has a long-term, positive relationship with these municipal and tribal organizations and community members. The project will contract with local research assistants and leadership to gather and interpret data where appropriate, review the survey instrument and methods, and review of reports and publications resulting from the research. We will enlist local organizational support through the tribal councils to increase survey and interview response rates. Training local assistants will support their hire for future studies and to apply for these types of grants themselves. Informed consent forms for each survey/interview will also be read over with the study participants so that the goals of the study and the rights of the research subject are clear. We will provide information about the study at every step, including initial meetings with the tribal councils and city governments, formal presentations to the public, and personally to each interviewee/survey respondent. Tribal councils and local representatives will assist in identifying the appropriate times and conditions for conducting the surveys.

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<b>Project Number:</b>	22-452			
<b>Title:</b>	False Pass and Nelson Lagoon Subsistence Harvest Monitoring and Traditional Ecological Knowledge (TEK) Investigation			
<b>Geographic Region:</b>	Southwest			
<b>Data Types:</b>	Harvest Monitoring and Traditional Ecological Knowledge			
<b>Principal Investigator:</b>	Lisa Hutchinson-Scarbrough, Division of Subsistence, Alaska Department of Fish and Game			
<b>Co-investigator:</b>	Bronwyn Jones, Division of Subsistence, Alaska Department of Fish and Game			
<b>Project Cost:</b>	<b>2022:</b> \$0	<b>2023:</b> \$48,097	<b>2024:</b> \$107,202	<b>2025:</b> \$124,614
<b>Total Cost:</b>	\$279,913			

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**Issue:** This project responds to two information needs identified in the 2022 Fisheries Resource Monitoring Program call for proposals prepared by the Office of Subsistence Management and the two Southwest Alaska Regional Advisory Councils by: 1) providing “reliable estimates of subsistence harvest and uses” for the lower Alaska Peninsula and Eastern Aleutian Island communities of False Pass and Nelson Lagoon; and 2) documenting the “impacts of climate change on salmon and the environment.” This study will fill a much-needed data gap in the available dataset for the harvest and use of salmon and nonsalmon fishes, within the context of total subsistence resources harvested, for the communities of False Pass and Nelson Lagoon. In addition, the study will document traditional and contemporary subsistence harvest and use areas, document traditional ecological knowledge (TEK) observations related to the effects of environmental change on salmon populations and subsistence activities, and evaluate the accuracy of the subsistence salmon permit system. The data from this study will be useful for regulatory bodies such as the Alaska Board of Fisheries (BOF) and the Federal Subsistence Board (FSB) in their assessments of whether subsistence needs are being met and to inform federal and state managers and regulatory bodies on subsistence regulations, especially in light of documented coastal erosion that affects fishing practices (Kluberton 2016).

Access to all five species of Pacific salmon found in Alaska is essential for the residents of False Pass and Nelson Lagoon; however, the two most utilized species are coho salmon *Oncorhynchus kisutch* and sockeye salmon *O. nerka*. Harvest and use of subsistence salmon by residents of False Pass and Nelson Lagoon occurs within the boundaries of the Alaska Maritime National Wildlife Refuge, the Izembek National Wildlife Refuge, and the Alaska Peninsula National Wildlife Refuge. In the past, these communities relied on a wide variety of resources for subsistence, with an emphasis on large quantities of caribou and salmon, but access to caribou populations has decreased over the past several decades with declined abundance and hunting restrictions, which has contributed to an increased harvest and reliance on salmon in False Pass and Nelson Lagoon over the last three decades (Reedy-Maschner and Maschner 2012). However, any changes in salmon harvest estimates resulting from changes in overall resource availability have not been documented. The most recent Alaska Department of Fish & Game (ADF&G) comprehensive subsistence surveys occurred over 30 years ago: for Nelson Lagoon the last survey occurred in 1987, and the most recent survey was in 1988 for False Pass.

Annual salmon harvest data are a fundamental input for sustainable management and evaluating if subsistence needs are being met, and for illustrating how subsistence harvests change over time. ADF&G has collected salmon harvest data through permits for the Alaska Peninsula Management Area (Area M)

annually since 1985. In 2000, a collaborative working group with representatives of ADF&G, the United States Fish and Wildlife Service (USFWS), and the Alaska Inter-Tribal Council evaluated the current harvest monitoring programs for salmon statewide. This collaborative investigation found the subsistence permit system alone in the Alaska Peninsula area has not provided information sufficient for effective management (Fall and Shanks 2000). More recent studies conducted by the Division of Subsistence in Alaska Peninsula community of Port Heiden and communities in the Chignik Management Area compared household survey data to permit data and found permit data significantly underestimated subsistence harvests (Fall et al. 2020; Hutchinson-Scarborough et al. 2016; Jones and Cunningham 2020). Without accurate harvest estimates, the FSB and the BOF lack the data they need to determine if reasonable opportunities for subsistence are being provided for residents to meet their needs as defined by amount reasonably necessary for subsistence (ANS) findings.

State of Alaska fisheries managers for the Alaska Peninsula Management Area identify data gaps and an inability to accurately assess subsistence salmon harvests estimates in False Pass and Nelson Lagoon due to low participation rates by residents.<sup>1</sup> Earlier subsistence studies documented that salmon are harvested using subsistence gear, obtained for home use from commercial harvests, and harvested by rod and reel in smaller quantities (Fall et al. 1996; Reedy-Maschner and Maschner 2012). Commercial salmon permit holders fishing in the Alaska Peninsula Area and Aleutian Islands are allowed to remove salmon from legally harvested commercial harvests for personal use, generally referred to as “home-pack” (5 AAC 39.010 (a)(b)). With some exceptions, the BOF does not recognize removal from commercial harvest or harvest by rod and reel as subsistence harvest methods in the Alaska Peninsula and Aleutian Island regions (5 AAC 01.420); however, rod and reel is recognized by the FSB for federally qualified residents in federal jurisdictions of the Alaska Peninsula management area.<sup>2</sup> The existing subsistence permit system does not require reporting of salmon obtained through commercial catches, or methods of harvest, including rod and reel.

This project will utilize face-to-face household surveys, in-depth mapping biographies, and key respondent interviews to investigate how changes in community demographics, the local environment, regulations, and resource availability have altered subsistence practices over the past several decades. This proposed project will: 1) update subsistence salmon and other wild resources harvest and use estimates in False Pass and Nelson Lagoon for the calendar year 2023; 2) evaluate the current subsistence salmon permit system and make recommendations for a revised harvest monitoring program based on study findings; and 3) document TEK observations related to the effects of environmental change on salmon populations and subsistence pursuits by False Pass and Nelson Lagoon residents.

Conducting a comprehensive study of all wild resources will provide important contextual information about how salmon harvest and use fits into an overall picture of subsistence practices in False Pass and

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<sup>1</sup>. Elizabeth Fox and Robert Murphy, ADF&G Area Management Biologists, Alaska Peninsula and Aleutian Islands, Personal Communication, February 25, 2021.

<sup>2</sup>. U.S. Fish and Wildlife Service, Office of Subsistence Management. Federal Subsistence Management Regulations for the Harvest of Fish and Shellfish on Federal Public Lands and Waters in Alaska: Effective 1 April 2019–31 March 2021. Anchorage: Federal Subsistence Board, Office of Subsistence Management, 2019. [https://www.doi.gov/sites/doi.gov/files/uploads/2019-21\\_fisheries\\_regs\\_book\\_web.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/2019-21_fisheries_regs_book_web.pdf).

Nelson Lagoon. Specifically, salmon data will include information about harvest and use of all species harvested for home use by date, harvest location, and gear type, including subsistence nets, removal from commercial harvests, harvest by rod and reel, or other methods. These data will contribute toward a fuller understanding of subsistence harvesting than is currently available through the permit system alone: it will improve managers' understanding of subsistence salmon harvests and provide the necessary data to assess the accuracy of the current permit system. Although managers are concerned about low reporting, there has never been an investigation into how the subsistence salmon permit program is working in the communities of False Pass or Nelson Lagoon. It will also address data gaps critical to informing federal and state regulatory processes—most importantly, an assessment of ANS and reasonable opportunity to access and harvest salmon. The documentation of TEK will aid in contextualizing harvest estimates and collate the observations of changes linked to climate on local salmon populations and subsistence activities. For example, much of the shoreline within the three National Wildlife Refuges in the study area is exhibiting signs of coastal erosion. Coastal erosion and other climate related phenomena may be altering subsistence activities and causing area residents to adapt subsistence harvest practices. The results of this study will increase federal and state fisheries managers' understanding of community-based subsistence fisheries, especially considering the rapidly changing environmental conditions occurring in the region.

**Objectives:** The goal of the project is to better understand contemporary harvest trends of salmon and other wild resources in the context of environmental, socioeconomic, and regulatory changes. To accomplish this, the project has three objectives.

1. Estimate subsistence salmon and other wild resources harvest amounts and locations by False Pass and Nelson Lagoon residents for study year 2023.
2. Evaluate the subsistence salmon permit system and make recommendations for improvement based on study findings.
3. Document traditional ecological knowledge (TEK) observations related to the effects of environmental change on salmon populations and subsistence activities by False Pass and Nelson Lagoon residents.

**Methods:** This study will take place in two communities, False Pass and Nelson Lagoon, and will integrate four social science data gathering methods to estimate the harvest and use of salmon and other wild resources used for subsistence by community residents, evaluate the salmon permit system, and document TEK related to observed effects of environmental change. These methods are: 1) Map Biographies, 2) Participant Observation, 3) Key Respondent Interviews (KRIs), and 4) Comprehensive Household Harvest Surveys. The data gathering methods for this project were designed to be integrated so that data collected using one method informs the development and implementation of other methods. The household harvest surveys will serve as the basis for accomplishing Objective 1. Map biographies, KRIs and participant observation will also provide supplemental quantitative and qualitative material to accomplish Objective 1. Objective 2 will be achieved using data from the household harvest surveys to compare with the subsistence salmon permits. Data from all four methods will be used to address Objective 3; however, the KRIs will serve as the primary data source for this objective.

**Partnerships/Capacity Building:** This project was developed in consultation with the False Pass Tribal Council, the Nelson Lagoon Tribal Council, The Aleutian Pribilof Islands Association, ADF&G Division of Commercial Fisheries, and USFWS refuge managers for the Alaska Maritime NWR and Alaska Peninsula NWR. During the planning and implementation phase of the project, researchers will remain in

contact with local tribal councils to obtain assistance with survey development, interview protocols, and logistics. Approximately three LRAs in each community will be trained and hired to help coordinate local logistical support and participation in project activities. LRAs will be compensated for their time and will be trained in survey administration and mapping as well as more broadly in the objectives and methods of the project. This project seeks to facilitate information sharing between community residents and management agencies. Through the surveys and interviews, community members will have the opportunity to share their knowledge of wild resources used for subsistence and their experiences accessing these resources. Information regarding the logistics of obtaining and using a subsistence salmon permit will be directly addressed by this project. In return, researchers will disseminate this information in a technical report and make recommendations to resource managers for revisions to the harvest monitoring program based on these study findings. The data and resulting technical report from this project will be available to the public and can be used by individuals, communities, and local and regional advisory committees and councils to advocate for subsistence practices before the Federal Subsistence Board and the Alaska boards of Fisheries and Game.

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<b>Project Number:</b>	22-453			
<b>Title:</b>	Subsistence Harvests and Uses of Salmon and Other Wild Resources in Manokotak			
<b>Geographic Region:</b>	Southwest			
<b>Data Types:</b>	Harvest Monitoring and Traditional Ecological Knowledge			
<b>Principal Investigator:</b>	Bronwyn Jones, Division of Subsistence, Alaska Department of Fish and Game.			
<b>Co-investigator:</b>	Cody Larson, Department of Natural Resources, Bristol Bay Native Association			
<b>Project Cost:</b>	<b>2022:</b> \$8,195	<b>2023:</b> \$109,156	<b>2024:</b> \$62,189	<b>2025:</b> \$28,841
<b>Total Cost:</b>	\$208,382			

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**Issue Addressed:** This project responds to two information needs identified in the 2022 Fisheries Resource Monitoring Program call for proposals by providing “reliable estimates of subsistence harvest and uses” for the community of Manokotak, and by documenting the “impacts of climate change on salmon and the environment.” This collaborative research project will collect subsistence harvest data for salmon and other important wild resources by residents of Manokotak, document traditional ecological knowledge (TEK) regarding local salmon populations and environmental changes, and partner with the Manokotak Nunaniq School to facilitate a community-based, participatory research effort by including students in research efforts and incorporating subsistence activities and knowledge into the classroom.

The five species of salmon found in Alaska are utilized for subsistence purposes in Manokotak, but the most targeted are sockeye, Chinook, and coho salmon. Both salmon spawning and rearing habitats, as well as subsistence harvest and use of salmon by the community of Manokotak occurs within the Federal Conservation System boundaries of the Togiak National Wildlife Refuge. The wild salmon migrating to this area support one of the largest subsistence fisheries with a Federal nexus and jurisdiction in Bristol Bay. The salmon returning to the Igushik River are essential to the vitality of the community.

Salmon remain a fundamental subsistence resource for the community of Manokotak and management of the subsistence salmon fishery relies on sound, current data. A Division of Subsistence survey from 1985 documented that Manokotak residents harvested 41,847 lb of salmon, or 136 lb per capita. In 1999, a Division of Subsistence survey documented that Manokotak residents harvested 46,353 lb of salmon, or 117 lb per capita. In 2008, the Division of Subsistence conducted another comprehensive survey and found that residents of Manokotak harvested an estimated 51,214 lb of salmon, or 135 lb per capita. That project found that many residents continued to preserve large quantities of salmon through traditional methods and that salmon were the most used and harvested category of wild resources. However, that study occurred 14 years ago; there is a need for updated subsistence harvest estimates because of rapidly changing environmental and sociocultural phenomenon occurring in the region. In the summer of 2019, tens of thousands of salmon were found dead in the Igushik River because of unusually high water temperatures. The 2019 salmon die off coincided with early melting snowpack and record-breaking temperatures in the Manokotak area. This visual manifestation of climate effects on the local salmon population created concerns among Manokotak residents. In addition to concerns about the changing environment, community members expressed the desire to provide more opportunities for Manokotak's youth to learn about and engage in subsistence activities and traditional food processing. Andrewski Toyukak, the President of the Manokotak Village Council, suggested student involvement in subsistence research would help create an opportunity for cultural transmission of TEK and subsistence knowledge.

This study seeks to document contemporary salmon harvest and use patterns in addition to gathering data that will provide a broader understanding of subsistence in Manokotak. This will be accomplished through administration of a comprehensive household harvest survey for calendar year 2022 and conducting key respondent interviews to contextualize those harvest data. Involving Manokotak youth in the subsistence research efforts will provide opportunities for youth to better understand how research informs management and regulation. This project is designed to obtain several different types of information about the effect of climate change on salmon populations, the local environment, and subsistence activities, while also providing more reliable estimates of the harvest and use of salmon and other wild resources by Manokotak residents. The documentation of TEK will produce detailed and specific place-based observations providing contextual explanations for subsistence harvest estimates and observed changes in salmon populations by area residents. This research will increase our understanding of salmon harvest patterns in the Togiak National Wildlife Refuge and assist federal, tribal, and state resource managers to ensure adequate subsistence opportunities are available. Additionally, this research will be available to regulatory boards, residents of Manokotak, and other Alaskans who are engaged in the regulatory process.

**Objectives:** The overarching goal of this research is to provide improved harvest estimates and increase understanding of subsistence harvest and use patterns, especially of salmon, by residents of Manokotak within the context of environmental change. This project has the following objectives:

1. Document the perceived effects of climate change on salmon populations, the local environment, and subsistence activities utilizing traditional ecological knowledge (TEK) and local ecological observations.
2. Document reliable estimates of the harvest and use of salmon and other wild resources used for subsistence by Manokotak residents during the 2022 calendar year.

3. Facilitate a community-based participatory research effort to produce a student-authored manuscript about Manokotak's past and present subsistence practices through a partnership with the Manokotak Nunaniq School.

**Methods:** This study will take place in the community of Manokotak and will integrate three social science data gathering methods to document TEK related to observed effects of climate change on salmon populations, the local environment, and subsistence activities and to estimate the harvest and use of salmon and other wild resources used for subsistence by Manokotak residents. These methods are: 1) Key Respondent Interviews (KRIs), 2) Comprehensive Household Harvest Surveys, and 3) Harvest and Use Area Mapping. Objective 1 will be accomplished by utilizing KRIs to gather qualitative data and will also use data from the comprehensive household harvest surveys. The household harvest surveys and harvest mapping will serve as the basis for accomplishing Objective 2. KRIs will also provide supplemental qualitative material to accomplish Objective 2. Objective 3 will be achieved alongside Manokotak students while conducting KRIs on a topic related to cultural and traditional subsistence practices and production.

**Partnerships/Capacity Building:** This project was developed and will be carried out collaboratively by ADF&G Division of Subsistence and BBNA. One of the main objectives of this project is to facilitate information sharing by involving the most inclusive group possible of Manokotak residents in this study. Therefore, an aspect of this project will involve high school student research and will be carried out through a partnership between project staff and the staff from the Manokotak School. As stated in the letter of support from the school, teachers will collaborate with project staff, local subsistence stakeholders, and community elders to develop workshops, help facilitate cultural and traditional subsistence practices, and help with the production of student projects as part of the school's Experience Week (E-week). In addition, this project seeks to provide a meaningful professional development opportunity through a BBNA internship by hiring a college student from the University of Alaska Fairbanks Bristol Bay Campus to assist with field research for this project. Finally, Local Research Assistants (LRAs) will be hired in Manokotak to help with KRI logistics and administration of the comprehensive household harvest surveys and to help coordinate local logistical support and participation. Researchers will work closely with selected LRAs to provide technical training. Duties for the LRA include: 1) assist with creation of community household list for survey sample, 2) assist with post-season harvest surveys, 3) arrange key respondents for TEK interviews, and 4) Assist with community review meetings.

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<b>Project Number:</b>	22-454
<b>Title:</b>	Reliable estimates of subsistence harvests and uses in Ouzinkie and Port Lions
<b>Geographic Region:</b>	Southwest
<b>Data Types:</b>	Harvest Monitoring/Traditional Ecological Knowledge
<b>Principal Investigator:</b>	Jacqueline Keating, Alaska Department of Fish and Game, Division of Subsistence
<b>Co-investigator:</b>	Kevin Van Hatten, Kodiak National Wildlife Refuge

<b>Project Cost:</b>	<b>2022:</b> \$145,621	<b>2023:</b> \$138,086	<b>2024:</b> \$40,164	<b>2025:</b> \$0
<b>Total Cost:</b>	\$323,870			

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**Issue Addressed:** This project responds directly to an information need identified in the “Priority Information Needs” document prepared by the Office of Subsistence Management and the Kodiak/Aleutians Subsistence Regional Advisory Council by providing updated “reliable estimates of subsistence harvest and uses” in the northern Kodiak area communities of Ouzinkie and Port Lions. Residents of Ouzinkie and Port Lions rely on a variety of subsistence resources, especially salmon runs from the Afognak River on Afognak Island. This fishery operates primarily in nearshore marine waters within the Alaska Maritime National Wildlife Refuge but falls under the jurisdiction of the Kodiak National Wildlife Refuge. This project will produce reliable estimates of subsistence harvests and uses of salmon and other resources through comprehensive household harvest surveys, resource mapping, and key respondent interviews.

Reliable estimates of subsistence harvest and uses of salmon and other resources in Ouzinkie and Port Lions address several critical linked issues with multiple applications for managers and other stakeholders. First, numerous members of the Kodiak/Aleutians Subsistence Regional Advisory Council expressed the importance of collecting updated harvest data for Ouzinkie and Port Lions at the September 2020 council meeting. The Division of Subsistence last conducted comprehensive harvest surveys in Ouzinkie and Port Lions in 2003, making them the most outdated Kodiak area communities to be surveyed (Kodiak road-connected communities were the most outdated, but will be surveyed in 2022 for the 2021 harvest year). Comprehensive household harvest surveys produce the only dataset that estimates a community’s annual use of subsistence resources; they also provide valuable insight into harvest and use participation rates, sharing of wild resources, food security levels, and the demographic and socioeconomic factors that influence patterns observed in harvest and use data. Updated subsistence data are timely in light of recent declines in salmon harvest estimates. The total reported subsistence salmon harvest in the Kodiak Management Area for 2018 (17,459 salmon) and 2019 (12,688 salmon) fell well below the prior 5-year and 10-year averages (22,988 and 26,844 salmon, respectively) based on returned state subsistence permits. The Sun’aq Tribe of Kodiak’s recent study on tribal seafood consumption, described in more detail below, concluded that Kodiak Tribes consume seafood at rate 10 times greater the rate of the U.S. population, and that salmon was the seafood consumed most frequently and in the greatest quantities (Lance et al. 2019). In combination, the documented importance of salmon consumption for Kodiak Tribes and the significant drop in reported harvests underline the need for updated and reliable harvest estimates with important contextual information to help explain the recent decline. Finally, comprehensive surveys include updating spatial data of subsistence use areas. These data provide information that is critical for responding to the increase in aquaculture and development proposals that could affect vital subsistence use areas. This study will provide reliable harvest and use estimates while documenting local knowledge and the environmental and social factors that influence subsistence harvests of salmon and other resources.

**Objectives:** The goal of this project is to complete updated salmon and other subsistence resource harvest estimates for the entire Kodiak Management Area. Reliable estimates are needed to inform management decisions of this complex fishery, and to address reasons for the recent decline in reported subsistence salmon harvests. This will be accomplished through the following objectives: (1) Produce reliable estimates of salmon and other resources harvested and used for subsistence in Port Lions and Ouzinkie;



(2) Create comprehensive spatial maps of subsistence harvest areas used by residents of Port Lions and Ouzinkie; and (3) Document local observations of subsistence harvesting practices and potential changes in subsistence resource populations, harvesting trends and areas used.

**Methods:** This research project will integrate three social science data gathering methods to address the study objectives: comprehensive household harvest surveys (Objective 1), harvest and use area mapping (Objective 2), and key respondent interviews (Objective 3).

Objective 1: Researchers and local research assistants will work in teams to conduct in person surveys in Ouzinkie and Port Lions using a full census sample. Surveys will collect information about each household's participation in subsistence and commercial fishing activities, the harvest and use of fish and other wild resources, sharing of resources, basic demographic and economic information, and food security. All information will be voluntary and anonymous.

Objective 2: Researchers will document geographic data concerning areas used for search and harvest activities for each resource category for the study year using Collector for ArcGIS on an iPad. There is no individual identifying information attached to the final maps; individual data points are combined to display general harvest areas, so that specific harvest locations are not revealed.

Objective 3: Researchers will document local observations of changes in subsistence resource populations, harvesting trends, and areas used through up to 10 semi-structured, open-ended interviews. Interviews will be guided by a formal interview protocol developed in collaboration with tribal governments and the Kodiak National Wildlife Refuge. Recorded interviews will be transcribed and uploaded to QSR International's NVivo 12 Pro for qualitative data analysis.

This project will be guided by the research principles adopted by the Alaska Federation of Natives in its Guidelines for Research, the National Academy of Science's "Principles for Conducting Research in the Arctic," Ethical Principles for the Conduct of Research in the North (Association of Canadian Universities for Northern Studies 2003), and the Alaska confidentiality statute (AS 16.05.815). Consistent with these principles, Ouzinkie and Port Lions tribal councils will review survey forms and interview protocols, and researchers will conduct community scoping meetings to raise awareness of the project and actively involve residents. Local research assistants (LRAs) will be hired to assist with surveys and key respondent interviews. Public data review meetings will be held to share preliminary results of the project and solicit comments and feedback. A project summary will be provided to all residents, and final study findings will be publicly available online through the Community Subsistence Information System (CSIS).

**Partnerships and Capacity Building:** The active involvement of U.S. Fish and Wildlife Service staff and tribal members will strengthen the proposed research. ADF&G will partner with the Kodiak National Wildlife Refuge to enhance research capacity and for a deeper understanding of federal fisheries issues in the Kodiak Management Area. Refuge involvement will include participating in survey development and review; identifying federal fisheries issues of concern that should be explored in key respondent interviews; providing staff support for community meetings and survey administration in Ouzinkie and Port Lions, exploring outreach opportunities for sharing subsistence, and participating in the final report review. This project will also benefit from active partnership with the Ouzinkie Corporation, Native Village of Ouzinkie, and Native Village of Port Lions. All entities will participate in reviewing survey

drafts and key respondent interview protocols, and identifying local research assistants and key respondents. All four entities have provided letters of support for this project.

## ANNUAL REPORTS

### **Background**

ANILCA established the Annual Reports as the way to bring regional subsistence uses and needs to the Secretaries' attention. The Secretaries delegated this responsibility to the Board. Section 805(c) deference includes matters brought forward in the Annual Report.

The Annual Report provides the Councils an opportunity to address the directors of each of the four Department of Interior agencies and the Department of Agriculture Forest Service in their capacity as members of the Federal Subsistence Board. The Board is required to discuss and reply to each issue in every Annual Report and to take action when within the Board's authority. In many cases, if the issue is outside of the Board's authority, the Board will provide information to the Council on how to contact personnel at the correct agency. As agency directors, the Board members have authority to implement most of the actions which would effect the changes recommended by the Councils, even those not covered in Section 805(c). The Councils are strongly encouraged to take advantage of this opportunity.

### **Report Content**

Both Title VIII Section 805 and 50 CFR §100.11 (Subpart B of the regulations) describe what may be contained in an Annual Report from the councils to the Board. This description includes issues that are not generally addressed by the normal regulatory process:

- an identification of current and anticipated subsistence uses of fish and wildlife populations within the region;
- an evaluation of current and anticipated subsistence needs for fish and wildlife populations from the public lands within the region;
- a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs related to the public lands; and
- recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

Please avoid filler or fluff language that does not specifically raise an issue of concern or information to the Board.

### **Report Clarity**

In order for the Board to adequately respond to each Council's annual report, it is important for the annual report itself to state issues clearly.

- If addressing an existing Board policy, Councils should please state whether there is something unclear about the policy, if there is uncertainty about the reason for the policy, or if the Council needs information on how the policy is applied.
- Council members should discuss in detail at Council meetings the issues for the annual report and assist the Council Coordinator in understanding and stating the issues clearly.

- Council Coordinators and OSM staff should assist the Council members during the meeting in ensuring that the issue is stated clearly.

Thus, if the Councils can be clear about their issues of concern and ensure that the Council Coordinator is relaying them sufficiently, then the Board and OSM staff will endeavor to provide as concise and responsive of a reply as is possible.

### **Report Format**

While no particular format is necessary for the Annual Reports, the report must clearly state the following for each item the Council wants the Board to address:

1. Numbering of the issues,
2. A description of each issue,
3. Whether the Council seeks Board action on the matter and, if so, what action the Council recommends, and
4. As much evidence or explanation as necessary to support the Council's request or statements relating to the item of interest.



## Alaska Maritime National Wildlife Refuge Summer 2021 Report for Kodiak/Aleutians Regional Advisory Council

### Keeping Covid Safe

Our priority is to keep our neighboring communities and our own staff safe. We are easing back into normal while continuing to be cautious. Seabird research field camps in 5 locations were occupied this year, but strict quarantine protocols were met and the ship did not dock at any communities except Homer. The visitor center indoor exhibits opened June 7 to limited numbers of people and with restrictions to keep everyone safe.

And then closed again July 27, as Covid-19 case rates shot up on the southern Kenai Peninsula. Staff continue to serve the public outdoors. From May until the end of July, we served over 16,000 visitors inside and outside of the center.



### Seabird Monitoring

Despite challenges related to the pandemic, we were able to get field crews into five camps to continue seabird monitoring. When the crews return to Homer, we will write reports and share findings with our colleagues. We also expect to create a simple summary in the form of a seabird report card later in the fall.

Our field camps, ship, and Homer office responded well to the July 28 earthquake. Our employees on Chowiet Island were only 30 miles from the epicenter. Our robust safety plan worked, and everyone came through in good shape.

### Invasives are a Serious Threat to Wildlife

We aim to help keep special places safe. It's easier to prevent problems than to fix them later. Fixing problems is expensive and difficult, but necessary.

### Vision for a Rat-Free Aleutians

We're working with Aleutian Pribilof Islands Association, Alaska Department of Fish and Game, Alaska Department of Environmental Conservation, U.S. Department of Agriculture, and the communities of Adak and Atka on a long-term vision for a rat-free Aleutian Islands. The first step is a feasibility study for rat eradication on Great Sitkin Island. This feasibility work is taking place this year and in 2022.

### Chirikof Island Cattle

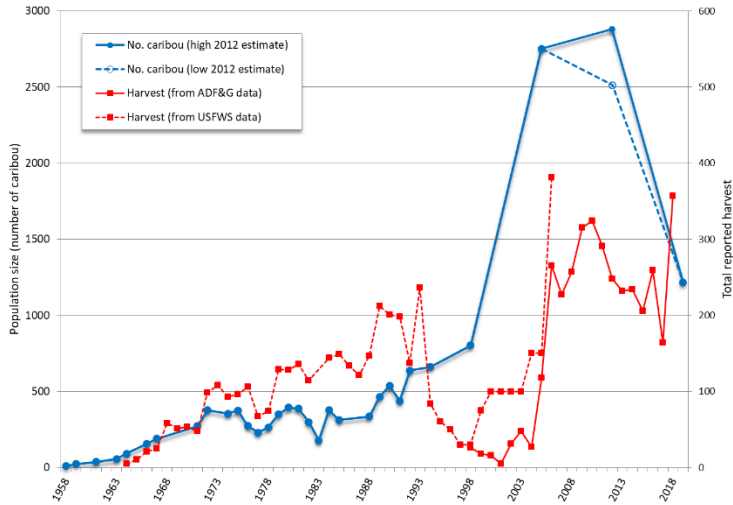
We set up 5 exclosures on Chirikof Island to see what things looked like without cattle grazing. Pictures are worth more than words.

We remain concerned about the impact introduced cattle have on cultural and historic sites as well as on wildlife, plants, and soil.



### Caribou on Adak Island

After conversations with Alaska Department of Fish and Game (ADF&G), we've decided against creating a new caribou management plan. As ADF&G pointed out, an existing plan is already in place. The plan is available through ADF&G. It seems likely that the caribou herd is experiencing the sort of decline typical of introduced island populations.



### Biosecurity Plan

We recognize that islands are especially vulnerable to the threats of invasive species like rats and non-native plants. Non-native plants and animals can displace native wildlife and plants and be very costly and difficult to remove. For that reason, we’ve written a biosecurity plan that focuses on prevention. The way that we pack our gear for field camps is a major part of this plan, so we’ve updated our protocols to focus on more careful attention to cleaning and packing our gear in a way that avoids unwanted hitchhikers. Our motto is *Clean, Inspect, and Seal* to keep island plants and animals healthy.

### Cleaning up Great Sitkin

In 1942, the U.S. Navy began building the Sand Bay Naval Station on Great Sitkin Island. Operated throughout the war as a fueling station and materiel depot, the station reverted to caretaker status in 1949 and was officially abandoned in 1963. But fuel remained in the abandoned tanks and pipelines. Contamination was documented over the years, but 2021 is the first serious effort to clean up what was left behind more than 60 years ago.



The Army Corps of Engineers is the lead agency for cleanup, cooperating with the Alaska Department of Conservation, the Alaska State Historic Preservation Office, and the U.S. Fish and Wildlife Service. Work began in May. Surveys revealed pre-war human occupation and the underground grid of pipes that transported fuel. Batteries, pieces of lead plates, and PCB-filled transformers were collected for removal. Soil core samples and sediment and surface water samples were collected and groundwater monitoring wells installed to check for contaminants and their extent. Some spilled fuel has weathered into an asphalt-like substance that will be removed. Pipe contents were carefully analyzed so future plans for further cleanup can be made.



### Making Connections

Education Specialist Kendra Bush entered classrooms virtually this year. Her focus shifted from structured, grade-specific, in-classroom lessons to creating virtual lessons that could be used in a variety of settings.

- Number of classes taught (virtual and in-person)= 107



- Number of students served in 2021=1616
- Number of adults served in 2021= 517

This total of 2,133 served is less than half the normal number. But virtual data show:

- Total virtual lessons created (videos and virtual experiences) = 23
- Estimated number of individuals reached with virtual lessons through social media=13,000

We helped support youth camps in three communities: St. Paul, Unalaska, and Sand Point. Each camp is unique to its community. The St. Paul Seabird Camp enjoyed a socially distanced sail-by from the *R/V Tiglax*. Students talked with the ship's crew by radio, asking questions about seabirds and research, and used binoculars to view crew members dressed up in seabird costumes!





United States Department of the Interior

FISH AND WILDLIFE SERVICE  
 Izembek National Wildlife Refuge  
 P. O. Box 127  
 Cold Bay, Alaska 99571



Izembek National Wildlife Refuge Report for the Kodiak/Aleutians Federal Subsistence Regional  
 Advisory Council  
 Fall Meeting, September 27-28, 2021  
 Cold Bay, AK

**CARIBOU**

*Federal Subsistence Hunt – Unit 9D (Southern Alaska Peninsula)*

The Izembek NWR 2021/22 Federal Subsistence Caribou Hunt in Unit 9D is split into two hunting periods. The first runs from August 01-September 30, 2021. The second half begins on November 15 and ends on March 31, 2022. These dates run concurrently with the Alaska Department of Fish & Game (ADF&G) sport hunt. ADF&G supported mirroring the state resident harvest regulations, therefore, the harvest limit is three caribou in Unit 9D which was increased from a limit of 1 bull caribou last year. The 2020/21 Federal Subsistence Caribou Hunt harvest totals seen below in Table 1.

Table 1. Summary of federal subsistence permits issued and number of caribou harvested by each community for the 2020/21 hunt in Unit 9D.

<b>Community</b>	<b># Permits Allocated</b>	<b># Permits Issued</b>	<b># Reported Caribou Harvested</b>
Cold Bay	15	3	0
False Pass	15	8	1
King Cove	15	1	0
Sand Point	15	5	0
<b>Total</b>	<b>60</b>	<b>17</b>	<b>1</b>

*Federal Subsistence Hunt – Unit 10 (Unimak Island)*

The Federal Subsistence Board approved a hunt for False Pass residents on Unimak to be taken between August 15 and October 15, 2020. The Alaska Department of Fish & Game supported an increase of hunter harvest from a total of 3 bull to a total of 5 bull caribou in Unit 10. Only 10 permits were allotted, five permits issued and 3 caribou were harvested.

## **BROWN BEAR**

### Annual Brown Bear Stream Survey

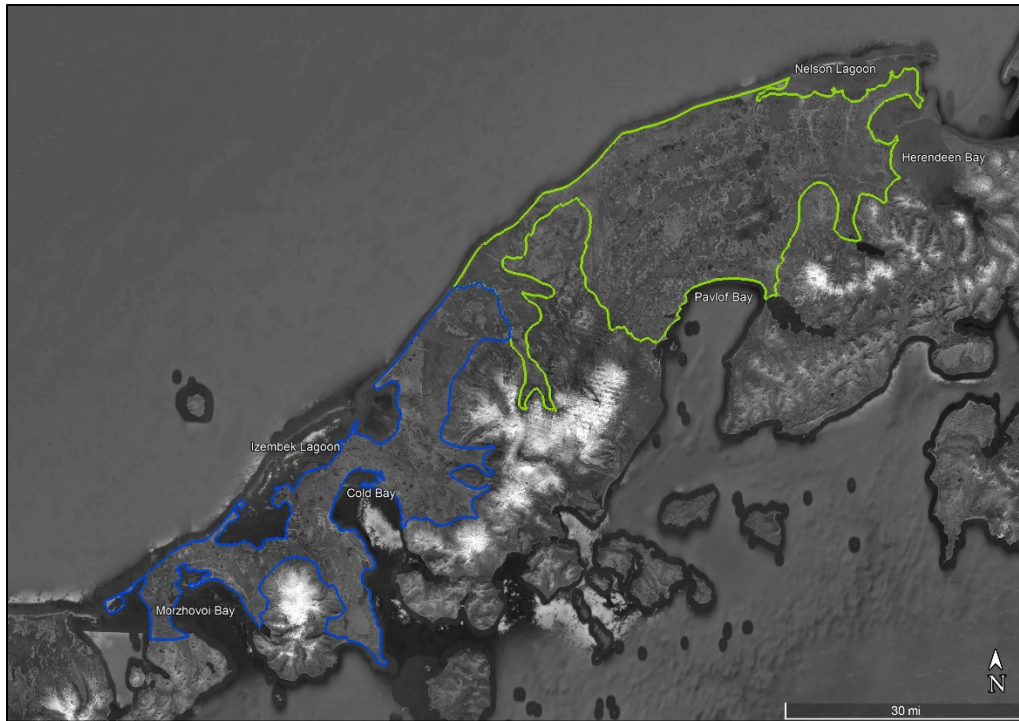
The annual brown bear stream survey is scheduled to start the week of August 30, 2021. Izembek staff will be meeting with other state and federal biologists in the area to review protocols and survey priorities to standardize methods across survey areas in southwest Alaska.

## **WATERFOWL**

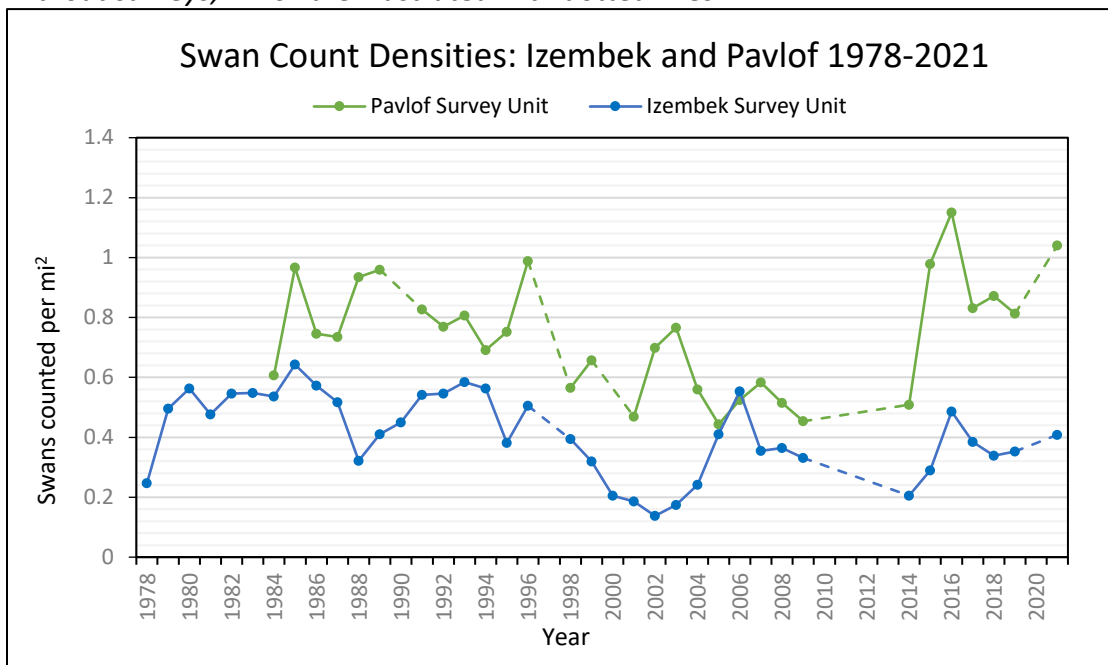
### Annual Tundra Swan Population Survey

Izembek completed the annual Tundra Swan Population Survey on May 17-18. The survey crew consisted of Daniel Pepin (Pilot/Biologist, Alaska Peninsula/Becharof NWR), Alison Williams (Wildlife Biologist, Izembek NWR), and Maria Fosado (Refuge Manager, Izembek NWR). Total survey time was 13.3 hours. Over the entire survey area (see Figure 1), survey crew observed a total of 905 swans and 117 nests. Within the Izembek survey unit, which represents the uniquely non-migratory population of Tundra Swans found on the southern Alaska Peninsula, we observed 169 swans and 23 nests. Swan densities in both survey units were higher than observed in surveys 2017-2019 but remain lower than the most recent high count in 2016. Throughout the history of the spring tundra swan population survey, the Izembek unit has been characterized by low swan densities, long-term decreasing swan counts, and with periodic short-term declines in swan counts followed by slow recoveries (see Figure 2). These low swan densities in the Izembek area may be attributed to sub-optimal habitat, low reproductive output, and predation of nests by brown bears, all of which may contribute to periodic emigrations from the population.

**Figure 1.** Map of survey units for the Izembek Annual Tundra Swan Population Survey. The Pavlof survey unit is to the north (in green), which mainly consists of Alaska Peninsula NWR lands. The Izembek Unit (in blue) covers Izembek NWR and adjacent Alaska Peninsula NWR.



**Figure 2.** Densities of swan counts throughout the Tundra Swan Survey history. The Izembek Unit was first surveyed in 1978, with the Pavlof survey unit added in 1984. Several years passed without surveys, which are illustrated with dotted lines.



## LANDBIRDS

### Alaska Landbird Monitoring Survey – Cold Bay Long Range Radar Site

Izembek staff completed a portion of the Alaska Landbird Monitoring Survey being performed in 2021 at Long Distance Radar sites across the state. These sites were erected to be early warning systems for oversea aircraft, but monitoring of landbirds using the areas surrounding them is lacking or absent. This survey was planned to be performed by staff from the Migratory Bird Management program from the US Fish and Wildlife Service Regional Office in Anchorage, but was delegated to Izembek staff due to travel restrictions due to the COVID-19 pandemic.

### Breeding Bird Survey

Izembek surveyed the Cold Bay route of the Breeding Bird Survey June 25, 2021. The Breeding Bird Survey is a long-term and international monitoring program operated across North America as a joined effort between the U.S. Geological Survey (Patuxent Wildlife Research Center) and the Canadian Wildlife Service (National Wildlife Research Center). Breeding bird surveys first began at Izembek National Wildlife Refuge (NWR) in 1993 and were annually done until 2009. Surveys resumed in 2019, were cancelled in 2020 due to the COVID-19 pandemic and resumed again in 2021. The survey route covers 25 miles of roads across the refuge and through Cold Bay, with survey points every 0.5 miles where observers count all detected birds for 3 minutes. Observers detected 34 unique species during the survey.

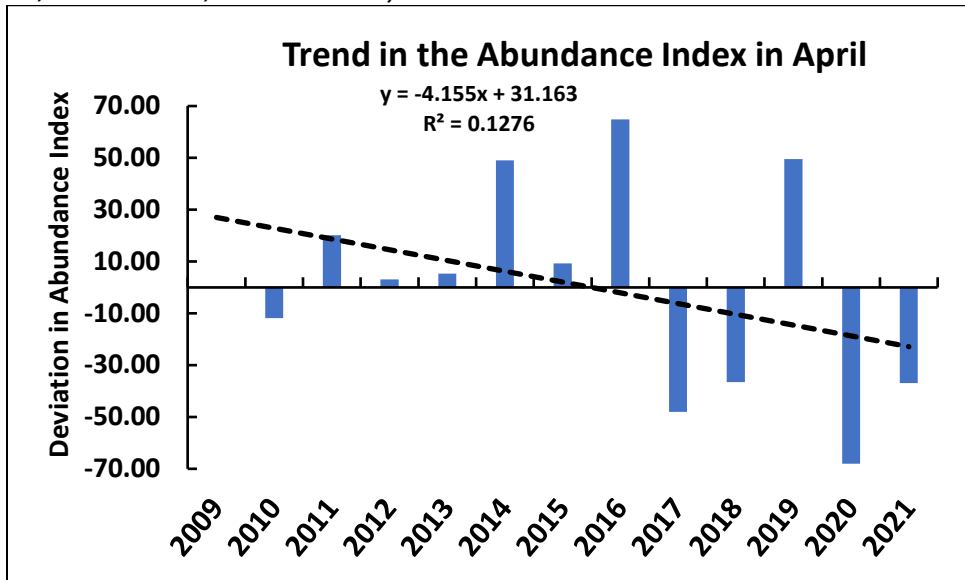
## HABITAT

### Eelgrass Abundance and Productivity Monitoring

Retired USGS Biologist, Dr. David Ward, completed an annual spring survey of eelgrass in Izembek lagoon on April 28-29 along 2 permanently established 100-m transects at Grant Point. Eelgrass was present in all quadrats and occurred at a mean cover of  $57 \pm 24$  % (range = 5–95 %). Mean length and width of eelgrass shoots were  $22.2 \pm 6.4$  cm (range = 10–39 cm) and  $2.6 \pm 0.47$  mm (range = 2–3.5 mm), respectively. Mean abundance index, a proxy for eelgrass aboveground biomass, was  $72.7 \pm 32.0$  (range = 16–165), which was 34 % lower than the 12-year average (2010–2021) for the abundance index in April (109.6; Figure 3).

**Figure 3.** Trend in eelgrass abundance at the beginning of the growing season as determined from eelgrass surveys at Grant Point, Izembek NWR. The Abundance Index is calculated by

multiplying the mean shoot length times the cover score using the Braun-Blanquet (BB) cover estimate technique of eelgrass in 20 quadrats. (Braun-Blanquet visual estimation technique breaks cover into categories: 0 % =0; 1–5 % =1; 6–25 % =2; 26–50 % =3; 51–75 % =4; 76–100 % =5).



**UPCOMING PROJECTS AT IZEMBEK NWR**

Projects are tentatively scheduled and may be postponed due to safety concerns with COVID-19.

Eelgrass Abundance and Productivity Monitoring

A lagoon-wide survey of Izembek lagoon was scheduled to occur August 9-22, with assistance from Dr. David Ward and Damian Menning (USGS Biologist) but was canceled due to the ongoing COVID-19 Pandemic. Izembek staff will complete the established 100m transects at Grant Point this August, replicating efforts from this spring.

Invasive Species Management

A group from the USFWS Alaska Region Invasive Species Program will be traveling from Anchorage to Cold Bay August 14-September 4 to conduct various surveys in the area for invasive species. Surveys will include surveying the road system for terrestrial invasive plants, water bodies with high use levels for aquatic invasives, and surveying marine environments for the invasive European Green Crab.

Brant Age Ratio Survey

The 2021 Brant Age Ratio survey is scheduled for October 4-15, which will mark the 59<sup>th</sup> consecutive year of collecting brant productivity data at Izembek NWR. Accurate estimates of the age composition can inform past reproductive success and future population trajectories. The productivity index for the entire Pacific brant population is generated from ground- and boat-based count ratios of adult to juvenile birds conducted in Izembek Lagoon and adjacent areas each fall when the birds are staging for migration.

*Steller's Eider Banding and Habitat Sampling*

A field crew from Alaska Sealife Center, University of Alaska Fairbanks, USGS, and ADF&G will travel to Izembek around September 1-19 to capture, band, and collect biological samples from Steller's eiders molting at Izembek Lagoon. The work is part of an ongoing study to characterize the habitat conditions, determine diets, understand body condition, and habitat use of eiders molting in Izembek lagoon during the fall. As a part of this project, benthic samples were collected in the lagoon in July 2021 and will be sampled again in September to characterize benthic prey availability for eiders, and to contrast with historic sampling results to understand changes in benthic communities that may contribute to the observed declines in Steller's eiders molting at Izembek. Benthic data will form the basis for a Master of Science degree for a graduate student at University of Alaska Fairbanks.

**SEALINGS**

*Brown Bear*

Izembek staff performed bear sealing's in Cold Bay as a proxy for ADF&G. During the May registration bear hunt, staff sealed 18 bear hides taken in Game Management Units 9D and 10, 16 of which were for non-resident hunters.

*Gray Wolf*

Four gray wolves were sealed at Izembek NWR in 2021.

*River Otter*

Ten river otters have been sealed at Izembek NWR in 2021.

*Walrus*

In 2021, two tusks were sealed at Izembek NWR.



## Project Updates

### 1. FRMP 18-451 Subsistence Harvest Trends of Salmon and Nonsalmon Fish in Four Southern Kodiak Island Communities, with a Focus on Olga and Akalura Lakes (Extended to 2021)

**Purpose:** (1) Provide reliable harvest estimates of the use of salmon and other nonsalmon fish species for subsistence, and (2) Document information about lake rearing habitats of sockeye salmon stocks in southwest Kodiak Island and assessment of declines in salmon stocks associated with subsistence harvest opportunities.

**Next step:** The final report was published and posted online in June 2021 and can be accessed here: [www.adfg.alaska.gov/techpap/TP477.pdf](http://www.adfg.alaska.gov/techpap/TP477.pdf). Printed reports and community summaries were sent to Larsen Bay, Akhiok, and Old Harbor. Printed community summaries will be distributed to Council members.



### 2. FRMP 18-450 Changing Regulations, Changing Environment, Changing Practices: A Study of Fish Harvest Practices in Unalaska (Ends December 31, 2022)

**Purpose:** Produce reliable estimates of the harvest and use of salmon and other nonsalmon fish species used for subsistence in Unalaska.

**Next step:** A total of 114 surveys were completed and entered for data analysis. Researchers will travel to Unalaska to hold a public data review meeting at 6pm on Thursday, September 2<sup>nd</sup>, and conduct key respondent interviews and participant observation. After the community data review, the Division can share preliminary results with the KARAC at the September meeting. The project period was extended one year to allow for a second participant observation trip in summer of 2022.

### 3. FRMP 2020-450 Proposal: Subsistence harvest trends of salmon and nonsalmon fish in Kodiak City and road-connected areas (Ends June 30, 2023)

**Purpose:** (1) Provide reliable harvest estimates of the use of salmon and other nonsalmon fish species for subsistence, and (2) Document local observations of change in fish populations and associated effects on subsistence uses for the Kodiak Road System.

**Next step:** Due to the pandemic, the project was delayed one year to conduct surveys in person in the winter of 2022. Fieldwork preparations will begin in late fall of 2021. The Division will work closely with the Sun'aq Tribe of Kodiak and the Kodiak National Wildlife Refuge to determine safety protocols and any necessary contingency planning.



## Relevant FRMP 2022 Proposals

1. Reliable Estimates of Subsistence Harvests and Uses in Ouzinkie and Port Lions
2. Estimates of Subsistence Harvests in False Pass and Nelson Lagoon
3. Subsistence Harvests and Uses of Salmon and Other Wild Resources in the Manokotak, Alaska

## For more information or concerns about subsistence

1. Contact Jackie Keating, Southcentral Subsistence Resource Specialist: (907) 267-2368, [jacqueline.keating@alaska.gov](mailto:jacqueline.keating@alaska.gov)
2. Visit the Community Subsistence Information System: <http://www.adfg.alaska.gov/sb/CSIS/>
3. Download Subsistence Publications: <http://www.adfg.alaska.gov/sf/publications/>

The mission of the Division of Subsistence is to scientifically gather, quantify, evaluate, and report information about customary and traditional uses of Alaska's fish and wildlife resources (AS 16.05.094).



# Winter 2022 Regional Advisory Council Meeting Calendar

*Last updated 3/19/2021*

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday-	Thursday	Friday	Saturday
<i>Feb. 6</i>	<i>Feb. 7</i> <i>Window</i> <i>Opens</i>	<i>Feb. 8</i>	<i>Feb. 9</i>	<i>Feb. 10</i>	<i>Feb. 11</i>	<i>Feb. 12</i>
		<b>BB - Naknek</b>		<b>SC - Anchorage</b>		
<i>Feb. 13</i>	<i>Feb. 14</i>	<i>Feb. 15</i>	<i>Feb. 16</i>	<i>Feb. 17</i>	<i>Feb. 18</i>	<i>Feb. 19</i>
		<b>NWA - Kotzebue</b>		<b>WI - Galena</b>		
<i>Feb. 20</i>	<i>Feb. 21</i> <b>PRESIDENTS DAY HOLIDAY</b>	<i>Feb. 22</i>	<i>Feb. 23</i>	<i>Feb. 24</i>	<i>Feb. 25</i>	<i>Feb. 26</i>
		<b>KA - Kodiak</b>				
<i>Feb. 27</i>	<i>Feb. 28</i>	<i>Mar. 1</i>	<i>Mar. 2</i>	<i>Mar. 3</i>	<i>Mar. 4</i>	<i>Mar. 5</i>
		<b>YKD - Bethel</b>		<b>SP - Nome</b>		
<i>Mar. 6</i>	<i>Mar. 7</i>	<i>Mar. 8</i>	<i>Mar. 9</i>	<i>Mar. 10</i>	<i>Mar. 11</i>	<i>Mar. 12</i>
		<b>EI - Fort Yukon</b>				
		<b>NS - TBD</b>				
<i>Mar. 13</i>	<i>Mar. 14</i>	<i>Mar. 15</i>	<i>Mar. 16</i>	<i>Mar. 17</i>	<i>Mar. 18</i>	<i>Mar. 19</i>
<i>Mar. 20</i>	<i>Mar. 21</i>	<i>Mar. 22</i>	<i>Mar. 23</i>	<i>Mar. 24</i>	<i>Mar. 25</i>	<i>Mar. 26</i>
		<b>SEA - Sitka</b>			<i>Window</i> <i>Closes</i>	

# Fall 2022 Regional Advisory Council Meeting Calendar

*Last updated 8/5/2021*

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>Aug. 7</i>	<i>Aug. 8 Window Opens</i>	<i>Aug. 9</i>	<i>Aug. 10</i>	<i>Aug. 11</i>	<i>Aug. 12</i>	<i>Aug. 13</i>
<i>Aug. 14</i>	<i>Aug. 15</i>	<i>Aug. 16</i>	<i>Aug. 17</i>	<i>Aug. 18</i>	<i>Aug. 19</i>	<i>Aug. 20</i>
<i>Aug. 21</i>	<i>Aug. 22</i>	<i>Aug. 23</i>	<i>Aug. 24</i>	<i>Aug. 25</i>	<i>Aug. 26</i>	<i>Aug. 27</i>
<i>Aug. 28</i>	<i>Aug. 29</i>	<i>Aug. 30</i>	<i>Aug. 31</i>	<i>Sep. 1</i>	<i>Sep. 2</i>	<i>Sep. 3</i>
<i>Sep. 4</i>	<i>Sep. 5 Labor Day Holiday</i>	<i>Sep. 6</i>	<i>Sep. 7</i>	<i>Sep. 8</i>	<i>Sep. 9</i>	<i>Sep. 10</i>
<i>Sep. 11</i>	<i>Sep. 12</i>	<i>Sep. 13</i>	<i>Sep. 14</i>	<i>Sep. 15</i>	<i>Sep. 16</i>	<i>Sep. 17</i>
<i>Sep. 18</i>	<i>Sep. 19</i>	<i>Sep. 20</i>	<i>Sep. 21</i>	<i>Sep. 22</i>	<i>Sep. 23</i>	<i>Sep. 24</i>
<i>Sep. 25</i>	<i>Sep. 26</i>	<i>Sep. 27</i>	<i>Sep. 28</i>	<i>Sep. 29</i>	<i>Sep. 30</i>	<i>Oct. 1</i>
<i>Oct. 2</i>	<i>Oct. 3</i>	<i>Oct. 4</i>	<i>Oct. 5</i>	<i>Oct. 6</i>	<i>Oct. 7</i>	<i>Oct. 8</i>
<i>Oct. 9</i>	<i>Oct. 10 Columbus Day Holiday</i>	<i>Oct. 11</i>	<i>Oct. 12</i>	<i>Oct. 13</i>	<i>Oct. 14</i>	<i>Oct. 15</i>
<i>Oct. 16</i>	<i>Oct. 17</i>	<i>Oct. 18</i>	<i>Oct. 19</i>	<i>Oct. 20</i>	<i>Oct. 21</i>	<i>Oct. 22</i>
<i>Oct. 23</i>	<i>Oct. 24</i>	<i>Oct. 25</i>	<i>Oct. 26</i>	<i>Oct. 27</i>	<i>Oct. 28</i>	<i>Oct. 29</i>
<i>Oct. 30</i>	<i>Oct. 31</i>	<i>Nov. 1</i>	<i>Nov. 2</i>	<i>Nov. 3</i>	<i>Nov. 4 Window Closes</i>	<i>Nov. 5</i>

## **Subsistence Regional Advisory Council Correspondence Policy**

The Federal Subsistence Board (Board) recognizes the value of the Regional Advisory Councils' role in the Federal Subsistence Management Program. The Board realizes that the Councils must interact with fish and wildlife resource agencies, organizations, and the public as part of their official duties, and that this interaction may include correspondence. Since the beginning of the Federal Subsistence Program, Regional Advisory Councils have prepared correspondence to entities other than the Board. Informally, Councils were asked to provide drafts of correspondence to the Office of Subsistence Management (OSM) for review prior to mailing. Recently, the Board was asked to clarify its position regarding Council correspondence. This policy is intended to formalize guidance from the Board to the Regional Advisory Councils in preparing correspondence.

The Board is mindful of its obligation to provide the Regional Advisory Councils with clear operating guidelines and policies, and has approved the correspondence policy set out below. The intent of the Regional Advisory Council correspondence policy is to ensure that Councils are able to correspond appropriately with other entities. In addition, the correspondence policy will assist Councils in directing their concerns to others most effectively and forestall any breach of department policy.

The Alaska National Interest Lands Conservation Act, Title VIII required the creation of Alaska's Subsistence Regional Advisory Councils to serve as advisors to the Secretary of the Interior and the Secretary of Agriculture and to provide meaningful local participation in the management of fish and wildlife resources on Federal public lands. Within the framework of Title VIII and the Federal Advisory Committee Act, Congress assigned specific powers and duties to the Regional Advisory Councils. These are also reflected in the Councils' charters. (*Reference: ANILCA Title VIII §805, §808, and §810; Implementing regulations for Title VIII, 50 CFR 100 .11 and 36 CFR 242 .11; Implementing regulations for FACA, 41 CFR Part 102-3.70 and 3.75*)

The Secretaries of Interior and Agriculture created the Federal Subsistence Board and delegated to it the responsibility for managing fish and wildlife resources on Federal public lands. The Board was also given the duty of establishing rules and procedures for the operation of the Regional Advisory Councils. The Office of Subsistence Management was established within the Federal Subsistence Management Program's lead agency, the U.S. Fish and Wildlife Service, to administer the Program. (*Reference: 36 CFR Part 242 and 50 CFR Part 100 Subparts C and D*)

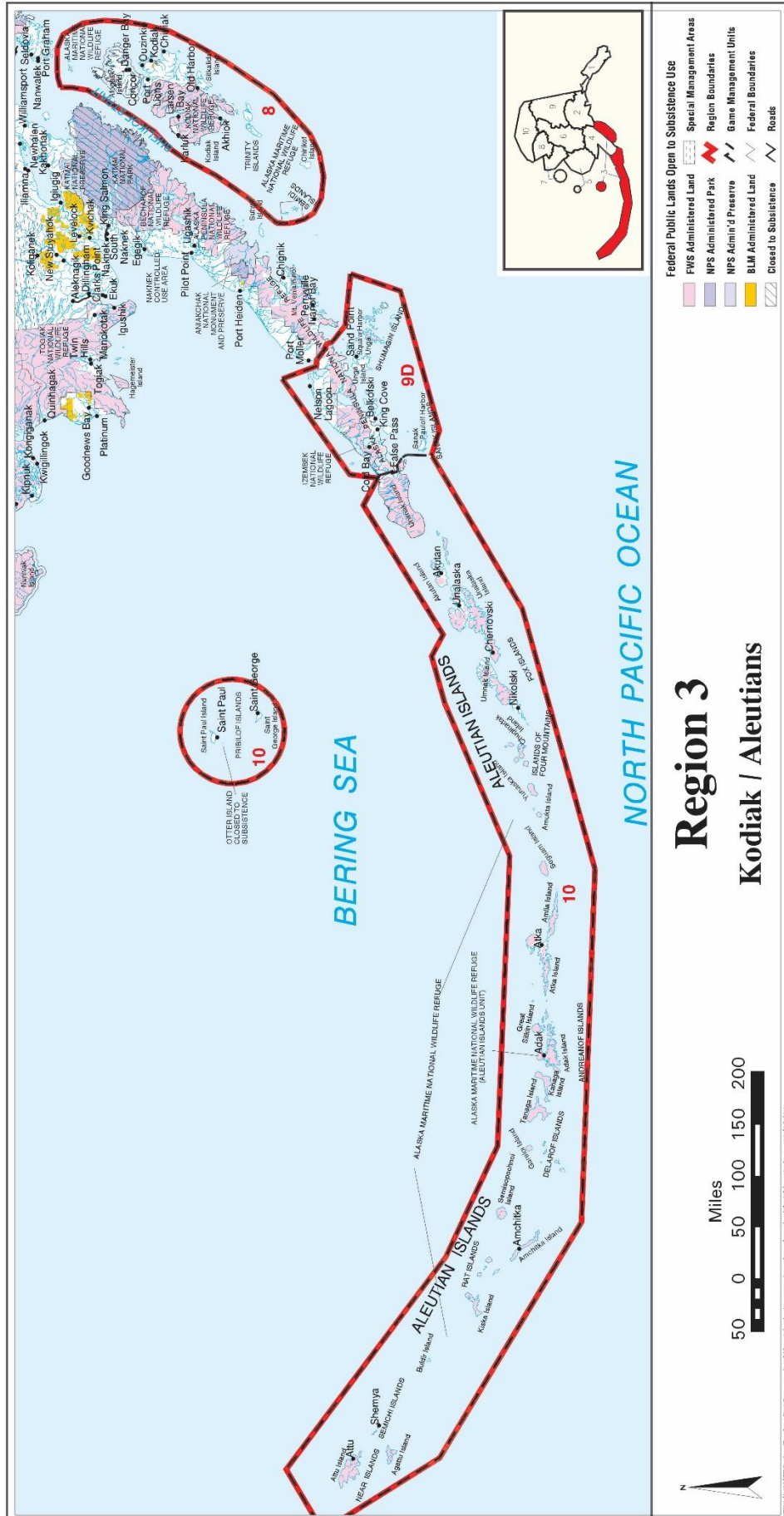
### **Policy**

1. The subject matter of Council correspondence shall be limited to matters over which the Council has authority under §805(a)(3), §808, §810 of Title VIII, Subpart B §\_\_\_.11(c) of regulation, and as described in the Council charters.
2. Councils may, and are encouraged to, correspond directly with the Board. The Councils are advisors to the Board.
3. Councils are urged to also make use of the annual report process to bring matters to the Board's attention.

6/15/04

4. As a general rule, Councils discuss and agree upon proposed correspondence during a public meeting. Occasionally, a Council chair may be requested to write a letter when it is not feasible to wait until a public Council meeting. In such cases, the content of the letter shall be limited to the known position of the Council as discussed in previous Council meetings.
5. Except as noted in Items 6, 7, and 8 of this policy, Councils will transmit all correspondence to the Assistant Regional Director (ARD) of OSM for review prior to mailing. This includes, but is not limited to, letters of support, resolutions, letters offering comment or recommendations, and any other correspondence to any government agency or any tribal or private organization or individual.
  - a. Recognizing that such correspondence is the result of an official Council action and may be urgent, the ARD will respond in a timely manner.
  - b. Modifications identified as necessary by the ARD will be discussed with the Council chair. Councils will make the modifications before sending out the correspondence.
6. Councils may submit written comments requested by Federal land management agencies under ANILCA §810 or requested by regional Subsistence Resource Commissions (SRC) under §808 directly to the requesting agency. Section 808 correspondence includes comments and information solicited by the SRCs and notification of appointment by the Council to an SRC.
7. Councils may submit proposed regulatory changes or written comments regarding proposed regulatory changes affecting subsistence uses within their regions to the Alaska Board of Fisheries or the Alaska Board of Game directly. A copy of any comments or proposals will be forwarded to the ARD when the original is submitted.
8. Administrative correspondence such as letters of appreciation, requests for agency reports at Council meetings, and cover letters for meeting agendas will go through the Council's regional coordinator to the appropriate OSM division chief for review.
9. Councils will submit copies of all correspondence generated by and received by them to OSM to be filed in the administrative record system.
10. Except as noted in Items 6, 7, and 8, Councils or individual Council members acting on behalf of or as representative of the Council may not, through correspondence or any other means of communication, attempt to persuade any elected or appointed political officials, any government agency, or any tribal or private organization or individual to take a particular action on an issue. This does not prohibit Council members from acting in their capacity as private citizens or through other organizations with which they are affiliated.

Approved by the Federal Subsistence Board on June 15, 2004.



**Department of the Interior  
U. S. Fish and Wildlife Service**

**Kodiak/ Aleutians Subsistence Regional Advisory Council**

**Charter**

1. **Committee's Official Designation.** The Council's official designation is the Kodiak/Aleutians Subsistence Regional Advisory Council (Council).
2. **Authority.** The Council is renewed by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. 3115 (1988)), and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is regulated by the Federal Advisory Committee Act (FACA), as amended (5 U.S.C. Appendix 2).
3. **Objectives and Scope of Activities.** The objective of the Council is to provide a forum for the residents of the Region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the Region.
4. **Description of Duties.** Council duties and responsibilities, where applicable, are as follows:
  - a. Recommend the initiation, review, and evaluation of proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the Region.
  - b. Provide a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife on public lands within the Region.
  - c. Encourage local and regional participation in the decision-making process affecting the taking of fish and wildlife on the public lands within the Region for subsistence uses.
  - d. Prepare an annual report to the Secretary containing the following:
    - (1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the Region.
    - (2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the Region.

- (3) A recommended strategy for the management of fish and wildlife populations within the Region to accommodate such subsistence uses and needs.
  - (4) Recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.
- e. Make recommendations on determinations of customary and traditional use of subsistence resources.
  - f. Make recommendations on determinations of rural status.
  - g. Provide recommendations on the establishment and membership of Federal local advisory committees.
  - h. Provide recommendations for implementation of Secretary's Order 3347: Conservation Stewardship and Outdoor Recreation, and Secretary's Order 3356: Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories. Recommendations shall include, but are not limited to:
    - (1) Assessing and quantifying implementation of the Secretary's Orders, and recommendations to enhance and expand their implementation as identified;
    - (2) Policies and programs that:
      - (a) increase outdoor recreation opportunities for all Americans, with a focus on engaging youth, veterans, minorities, and other communities that traditionally have low participation in outdoor recreation;
      - (b) expand access for hunting and fishing on Bureau of Land Management, U.S. Fish and Wildlife Service, and National Park Service lands in a manner that respects the rights and privacy of the owners of non-public lands;
      - (c) increase energy, transmission, infrastructure, or other relevant projects while avoiding or minimizing potential negative impacts on wildlife; and
      - (d) create greater collaboration with States, Tribes, and/or Territories.
- 1. Provide recommendations for implementation of the regulatory reform initiatives and policies specified in section 2 of Executive Order 13777: Reducing Regulation and Controlling Regulatory Costs; Executive Order 12866: Regulatory Planning and Review, as amended; and section 6 of Executive Order

13563: Improving Regulation and Regulatory Review. Recommendations shall include, but are not limited to:

Identifying regulations for repeal, replacement, or modification considering, at a minimum, those regulations that:

- (1) eliminate jobs, or inhibit job creation;
- (2) are outdated, unnecessary, or ineffective;
- (3) impose costs that exceed benefits;
- (4) create a serious inconsistency or otherwise interfere with regulatory reform initiative and policies;
- (5) rely, in part or in whole, on data or methods that are not publicly available or insufficiently transparent to meet the standard for reproducibility; or
- (6) derive from or implement Executive Orders or other Presidential and Secretarial directives that have been subsequently rescinded or substantially modified.

All current and future Executive Orders, Secretary's Orders, and Secretarial Memos should be included for discussion and recommendations as they are released. At the conclusion of each meeting or shortly thereafter, provide a detailed recommendation meeting report, including meeting minutes, to the Designated Federal Officer (DFO).

5. **Agency or Official to Whom the Council Reports.** The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.
6. **Support.** The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.
7. **Estimated Annual Operating Costs and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$175,000, including all direct and indirect expenses and 1.0 Federal staff years.
8. **Designated Federal Officer.** The DFO is the Subsistence Council Coordinator for the Region or such other Federal employee as may be designated by the Assistant Regional Director – Subsistence, Region 7, U.S. Fish and Wildlife Service. The DFO is a full-time Federal employee appointed in accordance with Agency procedures. The DFO will:
  - (a) Approve or call all Council and subcommittee meetings;



- (b) Prepare and approve all meeting agendas;
- (c) Attend all committee and subcommittee meetings;
- (d) Adjourn any meeting when the DFO determines adjournment to be in the public interest; and
- (e) Chair meetings when directed to do so by the official to whom the advisory committee reports.

9. **Estimated Number and Frequency of Meetings.** The Council will meet 1-2 times per year, and at such times as designated by the Federal Subsistence Board Chair or the DFO.
10. **Duration.** Continuing.
11. **Termination.** The Council will be inactive 2 years from the date the Charter is filed, unless, prior to that date, the charter is renewed in accordance with the provisions of section 14 of the FACA. The Council will not meet or take any action without a valid current charter.
12. **Membership and Designation.** The Council's membership is composed of representative members as follows:

Ten members who are knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife and who are residents of the Region represented by the Council.

To ensure that each Council represents a diversity of interests, the Federal Subsistence Board in their nomination recommendations to the Secretary will strive to ensure that seven of the members (70 percent) represent subsistence interests within the Region and three of the members (30 percent) represent commercial and sport interests within the Region. The portion of membership representing commercial and sport interests must include, where possible, at least one representative from the sport community and one representative from the commercial community.

For geographic membership balance, it is a Council goal to seat four members who reside on the Kodiak Archipelago, three members who reside on the Alaska Peninsula, and three who reside on the Aleutian and Pribilof Islands.

The Secretary of the Interior will appoint members based on the recommendations from the Federal Subsistence Board and with the concurrence of the Secretary of Agriculture.

Members will be appointed for 3-year terms. Members serve at the discretion of the Secretary.

Alternate members may be appointed to the Council to fill vacancies if they occur out of cycle. An alternate member must be approved and appointed by the Secretary before attending the meeting as a representative. The term for an appointed alternate member will be the same as the term of the member whose vacancy is being filled.

Council members will elect a Chair, Vice-Chair, and Secretary for a 1-year term.

Members of the Council will serve without compensation. However, while away from their homes or regular places of business, Council and subcommittee members engaged in Council, or subcommittee business, approved by the DFO, may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under section 5703 of title 5 of the United States Code.

13. **Ethics Responsibilities of Members.** No Council or subcommittee member will participate in any Council or subcommittee deliberations or votes relating to a specific party matter before the Department or its bureaus and offices including a lease, license, permit, contract, grant, claim, agreement, or litigation in which the member or the entity the member represents has a direct financial interest.
14. **Subcommittees.** Subject to the DFOs approval, subcommittees may be formed for the purpose of compiling information and conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO and the availability of resources.
15. **Recordkeeping.** Records of the Council, and formally and informally established subcommittees or other subgroups of the Council, must be handled in accordance with General Records Schedule 6.2, and other approved Agency records disposition schedules. These records must be available for public inspection and copying, subject to the Freedom of Information Act (5 U.S.C. 552).



Secretary of the Interior

DEC 12 2019

Date Signed

DEC 13 2019

Date Filed

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