



# Federal Subsistence Management Program 2024-2026 Wildlife Proposals

*Comment period open through June 30, 2023*



## **Comment period open through June 30, 2023**

Send your written comments on the enclosed proposals to:

Federal Subsistence Board  
Office of Subsistence Management  
(Attn: Theo Matuskowitz)  
1011 E. Tudor Road, MS-121  
Anchorage, Alaska 99503-6199  
Email: [subsistence@fws.gov](mailto:subsistence@fws.gov)  
Fax: (907) 786-3898

*\*Comments received after June 30, 2023 will be forwarded to the Federal Subsistence Board for their consideration; however, they will not be included in Fall 2023 Regional Advisory Council meeting materials, or in any proposal analysis.*

*After the Fall 2023 Regional Advisory Council meeting cycle, anyone wishing to provide written comments on these proposals may do so only by delivering comments directly to the Federal Subsistence Board or by email to [subsistence@fws.gov](mailto:subsistence@fws.gov) during its regulatory meeting scheduled to take place in April 2024.*

# INTRODUCTION

The Federal Subsistence Board (Board) invites your comments on the enclosed proposals to change Federal subsistence wildlife hunting and trapping regulations for the 2024–2026 regulatory years (July 1, 2024 to June 30, 2026). These proposals seek changes to existing Federal subsistence regulations for the taking of wildlife on Federal public lands and waters in Alaska. Wildlife proposals submitted during the current regulatory cycle can be found beginning on page 8.

In addition, the Board is asking for your comments on existing wildlife closures that will be reviewed by the Subsistence Regional Advisory Councils and the Board during this wildlife cycle. The wildlife closures being reviewed can be found beginning on page 5.

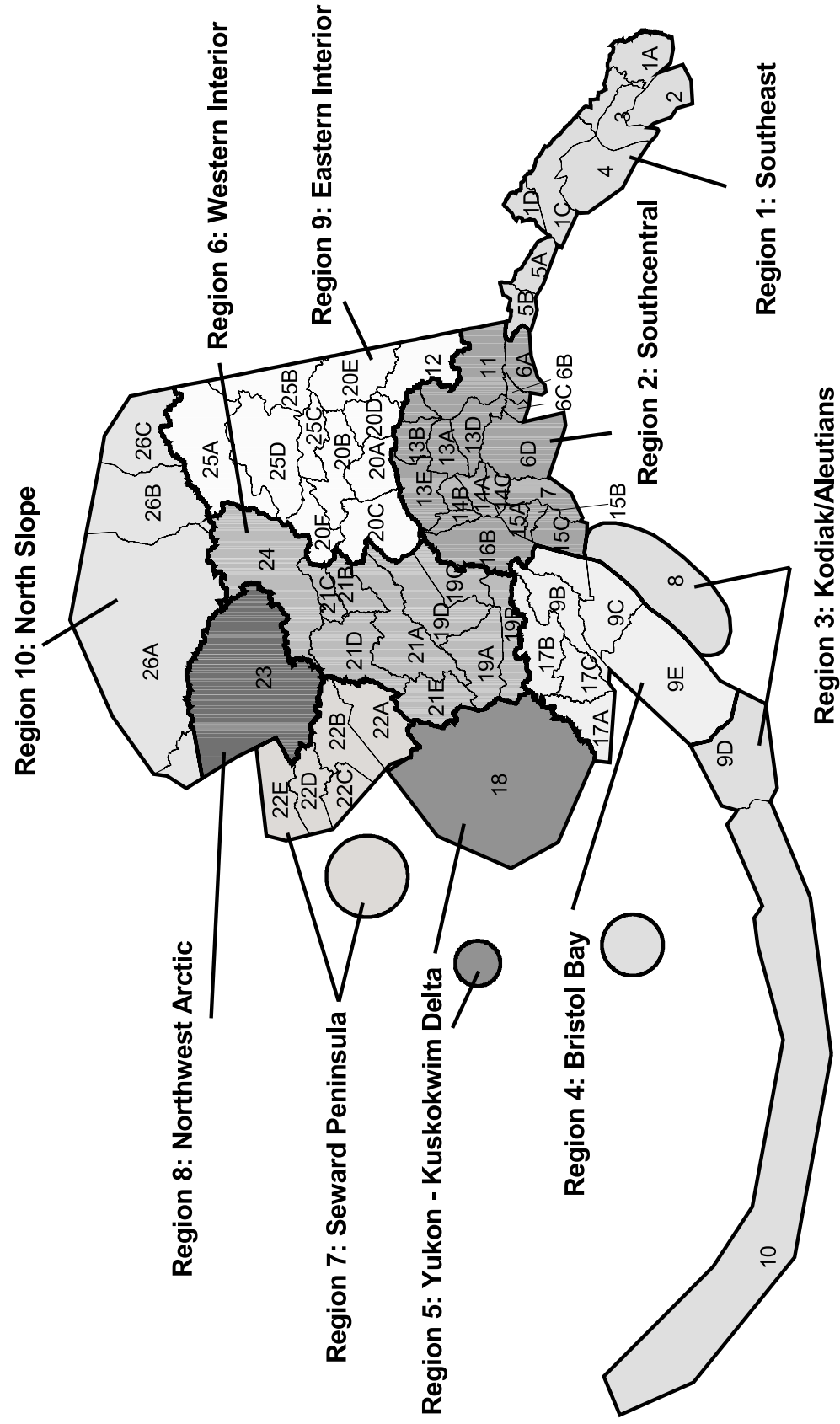
You may mail your comments to the Federal Subsistence Board at the address on the previous page of this book or email them to [subsistence@fws.gov](mailto:subsistence@fws.gov).

**Please refer to a specific proposal number or wildlife closure number in your comments.** All comments received by **June 30, 2023** will be included in the meeting materials for the appropriate Subsistence Regional Advisory Councils to discuss at their fall meetings and the Board at its spring 2023 meeting.

Before making decisions on these proposals and wildlife closures, the Board considers technical analyses prepared by its staff, recommendations from the 10 Subsistence Regional Advisory Councils, and any written public comments and oral testimony it receives on the proposal, along with Tribal and Alaska Native Corporation comments received during consultations. The Board may consider and act on alternatives that address the intent of a proposal while differing in approach. Once the Board makes its decisions, the changes will be published as final regulations for the 2024–2026 regulatory years, effective July 1, 2024, and the regulation book distributed throughout Alaska.

*Missing out on the latest Federal subsistence issues? If you'd like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing:*  
[\*fws-fsb-subsistence-request@lists.fws.gov\*](mailto:fws-fsb-subsistence-request@lists.fws.gov)

# Federal Subsistence Resource Regions and Units



# GENERAL INFORMATION

## Federal Subsistence Board

The Federal Subsistence Board oversees the Federal Subsistence Management Program. Board members include the Alaska directors of five Federal agencies: the U.S. Fish and Wildlife Service, National Park Service, Bureau of Land Management, Bureau of Indian Affairs and the U.S. Forest Service. The Board Chair is a representative of the Secretaries of the Interior and Agriculture. Two additional public members are appointed by the Secretaries to represent rural subsistence users.

Federal Subsistence Regional Advisory Councils (Council(s)), State of Alaska representatives, and the general public play an active role in the regulatory process. You can find information about the Federal Subsistence Board on the Federal Subsistence Management Program's website at: [www.doi.gov/subsistence](http://www.doi.gov/subsistence) or by contacting the Office of Subsistence Management at 800-478-1456 or 907-786-3888.

## Regional Advisory Councils

The Federal Subsistence Management Program divides Alaska into 10 subsistence resource regions, each represented by a Subsistence Regional Advisory Council. These 10 Councils provide an opportunity for Alaskans to contribute in a meaningful way to the management of subsistence resources. Subsistence users and other stakeholders have the opportunity to comment and offer input on subsistence issues at Council meetings. Councils meet a least twice a year to develop proposals to change Federal subsistence regulations, and review and make recommendations on proposals submitted by others.

## Council membership

The Secretaries of the Interior and Agriculture appoint Council members. Members must reside in the area they wish to represent and have knowledge of subsistence uses and needs. Each year the Office of Subsistence Management accepts applications and nominations for membership between August and January. If you are interested in applying for membership, please contact Katya Wessels or the council coordinator for your region.

## Federal Subsistence Regional Advisory Council Coordinators

Council Coordinators facilitate communication between the Subsistence Regional Advisory Councils and the Federal Subsistence Board. Each Coordinator is responsible for one or two regions and serves as a contact for the Councils, Federal agency staff, and the public. Contact a Coordinator for more information on the activities of each Council.

### Southeast Region

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### Eastern Interior and Yukon-Kuskokwim Regions

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**For information on Regional Advisory Council membership, contact:**

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Proposal Number	Affected Region(s)	Species	Unit	General Description	Page
<b>Statewide</b>					
WP24-01	Statewide	Brown Bear	Statewide	Allow sale of brown bear hides	8
<b>Southeast</b>					
WP24-02	SE	Goat	1C	Extend season to July 24-Dec. 31	10
WP24-03	SE	Goat	1C	Close to non-federally qualified users from Aug. 1-31	11
WP24-04	SE	Deer	4	Angoon area - close to non-federally qualified users from Nov. 1-15	13
WP24-05	SE	Deer	4	Hoonah area - close to non-federally qualified users Nov. 1-15	16
WP24-06	SE	Deer	4	Pelican area - close to non-federally qualified users Nov. 1-15	19
<b>Southcentral</b>					
WP24-07	Statewide	Furbearers	7, 14C	Establish trapping exemptions within Anchorage municipality	22
WP24-08	Statewide	All	7, 15	Establish setbacks to taking game along Sterling Highway	31
WP24-09	SC,EI	Caribou	13A, 13B	Modify harvest limit and expand delegated authority for Nelchina caribou	35
<b>Kodiak/Aleutians</b>					
WP24-10	KA	Brown Bear	8	Implement locking tag fee exemption	37
WP24-11	KA	Deer	8	Remove restriction on antlerless harvest Oct.1 - Jan. 31	44
<b>Bristol Bay</b>					
WP24-12	BB	Moose	9B	Extend fall season to align with State regulations	46
WP24-13	BB	Moose	9B	Extend fall season to align with State regulations	48

2024–2026 Wildlife Proposals

Proposal Number	Affected Region(s)	Species	Unit	General Description	Page
WP24-14	BB	Moose	9B	Extend fall season to align with State regulations	49
WP24-15	BB	Caribou	9C	Establish hunt for resident herd in Katmai National Preserve	51
WP24-16	BB,KA	Caribou	9E	Include residents of Unit 9C in §804 restriction	53
WP24-17	BB,KA	Caribou	9E	Include King Salmon, Naknek, and South Naknek in §804 restriction	55
WP24-18	BB,WI	Caribou	17	Expand hunt area boundary for Nushagak caribou	59
<b>Yukon-Kuskokwim Delta</b>					
WP24-19	YKD,WI	Moose	18	Extend season to October 15 within the Kanektok and Arolik drainages	60
WP24-20	YKD,WI	Moose	18	Modify harvest limit and expand delegated authority for winter season	61
WP24-21	YKD,WI	Moose	18	Include Kwigillingok, Kongiganak, and Quinhagak in §804 restriction	71
WP24-22	YKD	Muskox	18	Establish a customary and traditional use determination	74
WP24-23	YKD	Muskox	18	Establish hunt	76
<b>Western Interior</b>					
WP24-24	WI	N/A	19	Divide 19A into two subunits	80
WP24-25	WI	Sheep	24A, 24B	Reduce harvest limit to 1 ram within Gates of the Arctic National Park	81
WP24-26	WI	Sheep	24A, 26B	Extend closure to all users for two years	82
<b>Seward Peninsula</b>					
WP24-27	SP,NWA,NS	Muskox	22, 23	Change to draw permit hunt; standardize Delegated authority for all hunts	84



Proposal Number	Affected Region(s)	Species	Unit	General Description	Page
<b>Northwest Arctic</b>					
WP24-28	YKD,WI,SP, NWA, EI,NS	Caribou	21D, 22, 23, 24, 26A	Reduce harvest limit to 4 caribou per year,. only one of which may be a cow	90
WP24-29	WI,SP,NWA, NS	Caribou	23	Reduce harvest limit of 4 caribou per year,. only one of which may be a cow	93
WP24-30	WI,SP,NWA, NS	Caribou	23	Close to non-federally qualified users from Aug. 1-Oct. 31	95
WP24-31	WI,SP,NWA, NS	Caribou	23	Close to non-federally qualified users from Aug. 1-Oct. 31	97
<b>Eastern Interior</b>					
WP24-32	Statewide	Marten	12, 19, 20, 21, 24, 25	Extend season to March 15	100
WP24-33	EI	Moose	25B, 25C, 25D remainder	Extend fall hunt season to October 15	102
WP24-34	EI	Moose	25D West	Add Circle and Fort Yukon to the customary and traditional use determination	104
WP24-35	EI	Moose	25D West	Open moose hunting to all federally qualified subsistence users; revise permit allocation	106
WP24-36	EI,NS	Sheep	25	Remove Kaktovik from the customary and traditional use determination	109
<b>North Slope</b>					
WP24-37	NS	Muskox	26C	Establish may be announced season; remove permit restrictions; expand delegated authority	111
WP24-38	NS	Muskox	26C	Modify harvest limit; establish may be announced season; remove permit restrictions; expand delegated authority	114

The proposals are published as submitted by the proponents and vary in color, format, size, and type.

## WILDLIFE CLOSURE REVIEWS

The Office of Subsistence Management (OSM) is reviewing existing wildlife closures to determine whether the original justifications for closure continue to apply. These reviews are being conducted in accordance with guidance found in the Federal Subsistence Board's (Board) Policy on Closures to Hunting, Trapping and Fishing on Federal public lands and waters in Alaska, which was adopted in 2007, and amended in 2019. Pursuant to the Policy, closure review analyses are being addressed by the Subsistence Regional Advisory Councils and the Board in the same manner as regulatory proposal analyses.

Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) establishes a priority for the taking of fish and wildlife on Federal public lands and waters for non-wasteful subsistence uses over the taking of fish and wildlife for other purposes (ANILCA Section 804). The Federal Subsistence Board is authorized to restrict or close the taking of fish and wildlife by nonsubsistence users on Federal public lands and waters (ANILCA Section 804 and 815(3)) when necessary for: 1) the conservation of healthy populations of fish and wildlife; 2) for reasons of public safety, administration, or to assure the continued viability of such population; 3) to continue subsistence uses of such population; or 4) pursuant to other applicable law. In addition, the Board may also close Federal public lands and waters to any taking of fish and wildlife for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA Section 816(b)).

Distribution and abundance of fish and wildlife populations are known to fluctuate based upon a variety of factors such as weather patterns, management actions, habitat changes, predation, harvest activities, and disease. Subsistence use patterns are also known to change over time in response to many factors including resource abundance and human population changes, among others. A Closure Review analysis contains a brief history of why a closure was implemented, along with a summary of the current resource condition and the OSM recommendation as to whether the closure should be continued or lifted.

The affected Subsistence Regional Advisory Councils are asked to consider the OSM recommendation and make recommendations to the Board about closures. Recommendations from Councils receive deference from the Board on the final action, unless they are: 1) not supported by substantial evidence; 2) violate recognized principles of fish and wildlife conservation; or 3) would be detrimental to the satisfaction of subsistence needs. Closures remain in effect until changed by the Board.

Additional information on unit-specific wildlife closures can be found in the Federal Subsistence Management Regulations for the Harvest of Wildlife on Federal Public lands in Alaska.

A table of the existing wildlife closures for review this wildlife regulatory cycle is located on the following page.

Closure Number	Affected Region(s)	Species	Unit	Description
WCR24-03	SC	Moose	7	Draining into King's Bay closed to moose hunting except by residents of Chenega Bay and Tatitlek
WCR24-41	SC	Moose	6	Unit 6C closed to moose hunting by non-federally qualified users in November and December
WCR24-04	BB	Caribou	9	Unit 9C, remainder closed to caribou hunting except by residents of Unit 9C and Egegik
WCR24-06	BB,KA	Caribou	9	Unit 9E closed to caribou hunting except by residents of Unit 9E, Nelson Lagoon, and Sand Point
WCR24-38	YKD,WI	Moose	18	Unit 18 (Kuskokwim River hunt area) closed to moose hunting except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmautlauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag and Kalskag
WCR24-20	WI	Moose	24	Kanuti Controlled Use Area closed to moose hunting by non-federally qualified users
WCR24-43	WI,YKD	Moose	19	Unit 19A remainder closed to moose hunting except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek
WCR24-10	SP	Muskox	22	Unit 22B closed to muskox hunting by non-federally qualified users
WCR24-15	SP	Moose	22	Unit 22D remainder closed to moose hunting by non-federally qualified users
WCR24-28	SP	Moose	22	Unit 22D west of the Tisuk River drainage and Canyon Creek closed to muskox hunting except by residents of Nome and Teller
WCR24-29	SP	Moose	22	Unit 22D remainder closed to muskox hunting except by residents of Elim, White Mountain, Nome, Teller, and Brevig Mission

Closure Number	Affected Region(s)	Species	Unit	Description
WCR24-30	SP	Muskox	22	Unit 22E closed to muskox hunting by non-federally qualified users
WCR24-44	SP	Muskox	22	Unit 22D, Kuzitrin River drainage closed to muskox hunting except by residents of Council, Golovin, White Mountain, Nome, Teller, and Brevig Mission.
WCR24-19	NWA	Muskox	23	Unit 23, south of Kotzebue Sound and west of and including the Buckland River drainage closed to muskox hunting by non-federally qualified users
WCR24-21	EI,NS	Sheep	25	Unit 25A, Arctic Village Sheep Management Area closed to sheep hunting by non-federally qualified users
WCR24-35	SC,EI	Caribou	12	Unit 12, east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickeral Lake to the Canadian border closed to caribou hunting by NFQUs (Chisana caribou)
WCR24-42	SC,EI	Caribou	12	Unit 12, within Wrangell-St. Elias National Park and Preserve that lies west of the Nabesna River and the Nabesna Glacier closed to caribou hunting by all users (Mentasta caribou)
WCR24-31	NS	Moose	26	Unit 26B, remainder and Unit 26C closed to moose hunting except by Kaktovik residents

## WP24-01

4/17/23, 9:25 AM

FWS-R7-SM-2022-0105-0013.html

# PUBLIC SUBMISSION

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**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0013

Comment from Rowland, Kaleb

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## Submitter Information

**Name:** Kaleb Rowland

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Glennallen, AK, 99588

**Email:** rowconbuilders@gmail.com

**Phone:** 9073229302

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## General Comment

Proposal to change federal subsistence wildlife harvest regulations 2024-26

1. Contact information:

- Name: Kaleb Rowland
- Organization:
- Address: Box MXY Glennallen, AK 99588
- Phone:(907)322-9302
- E-mail address: Rowconbuilders@gmail.com

2. The regulation you wish to change, including management unit number and species.

Quote the current regulation if known. If you are proposing a new regulation, please state “new regulation.”

This is a statewide proposal to change the following regulation:

50 CFR 100.25(j)(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, and sheep.

3. The regulation as you would like to see it written.

50 CFR 100.25(j)(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested brown bear, caribou, deer, elk, goat, moose, musk ox, and sheep.

4. An explanation of why the regulatory change should be made.

Current federal regulations require that the hides of brown bears be salvaged. The sale of the hides from all other big game species is allowed except for brown/grizzly bears.

50 CFR 100.25(j)(2) If you take wildlife for subsistence, you must salvage the following

4/17/23, 9:25 AM

FWS-R7-SM-2022-0105-0013.html

parts for human use:

- (i) ....
- (ii) The hide and edible meat of a brown bear, except that the hide of brown bears taken in Units 5, 9B, 17, 18, portions of 19A and 19B, 21D, 22, 23, 24, and 26A need not be salvaged;
- (iii) The hide and edible meat of a black bear;

## WP24-02

4/17/23, 9:24 AM

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**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0023

Comment from Orr, Nicholas

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## Submitter Information

**Name:** Nicholas Orr

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## General Comment

Nicholas Orr  
202 Troy Ave  
Juneau, Alaska

Change the federal subsistence open season for Unit 1C remainder for mountain goat.  
The current regulation is:

Unit 1C remainder—1 goat by State registration permit only.  
Open Season: Aug. 1 - Nov. 30

I propose changing the regulation to:

Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River —1 goat by State registration permit only.

Open Season:  
July 24 - Dec 31

- An explanation of why this regulation change should be made

This change would provide meaningful federal subsistence priority.

**WP24-03**

**PUBLIC SUBMISSION**

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Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0005

Comment from Southeast Alaska Subsistence Regional Advisory Council

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**Government Agency Type:** Regional

**Government Agency:** Southeast Alaska Subsistence Regional Advisory Council

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**General Comment**

Wildlife Proposal Submission: Unit 1c Goat

submitted by Southeast Alaska Subsistence Regional Advisory Council

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**Attachments**

Unit 1C Goat Proposal



## 2024–2026 Wildlife Proposals

### Southeast

## Federal Wildlife Proposal – Unit 1C, goat Southeast Regional Advisory Council

### Issue:

Close a portion of Unit 1C, remainder (RG015 permit area) to goat hunting by non-Federally qualified users from Aug. 1-31.

### Existing Federal Regulation

#### Unit 1C - Goat

*Unit 1C, remainder - 1 goat by State registration permit only* Aug. 1-Nov. 30.

### Proposed Federal Regulation

#### Unit 1C - Goat

*Unit 1C, remainder - 1 goat by State registration permit only* Aug. 1-Nov. 30.

***Federal public lands within the drainages of the Chilkat Range south of the south bank of the Endicott River are closed to goat hunting Aug. 1-31, except by Federally qualified subsistence users hunting under these regulations.***

### Why Should this regulation be changed?

This proposal is to establish a meaningful preference for the continuation of subsistence uses of goat. At their January 2023 meeting, the Alaska Board of Game adopted Proposal 31 to extend the resident goat season in the southern end of the Chilkat range in Unit 1C from Sept. 1-Nov. 30 to Aug. 1-Nov. 30, effectively eliminating the federal subsistence priority. Previously, federally qualified subsistence users had the month of August to hunt goats in this area without competition from non-Federally qualified users. The Council also notes that the Icy Strait Advisory Committee unanimously opposed Proposal 31 because it eliminated the federal subsistence priority.

The affected area had a timber sale in the 1970s, which created lots of logging roads near alpine areas. The renovated docking area at the old log transfer facility has a ramp where people can unload 4-wheelers and hunt goats via the old logging roads. However, there is only room to anchor 3-4 boats at once without worrying about boats getting blown away. This creates access issues. The logging roads also provide relatively easy access to alpine areas. People set up camps, which block the roads and prevent access to the best areas to hunt goats, further contributing to access issues.

The reason why the Federal goat season opened August 1 was to provide opportunity for Federally qualified subsistence users to access this hunt area without competition from non-Federally qualified users, especially before the State moose season opens on September 15 when the area gets even more crowded.

Submitted by: Southeast Alaska Subsistence Regional Advisory Council  
POC: DeAnna Perry, Council Coordinator  
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WP24-04

# PUBLIC SUBMISSION

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Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0026

Comment from Southeast Alaska Subsistence Regional Advisory Council

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**Government Agency Type:** Regional

**Government Agency:** Southeast Alaska Subsistence Regional Advisory Council

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## General Comment

Wildlife Proposal Submission: Unit 4 Deer - Angoon

submitted by the Southeast Alaska Subsistence Regional Advisory Council

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## Attachments

Unit 4 Deer - Angoon proposal

## Federal Wildlife Proposal - Angoon

### Southeast Regional Advisory Council

#### Issue:

Close a portion of Admiralty Island to deer hunting by non-Federally qualified users from Nov. 1-15. The specific closure areas include Wildlife Analysis Areas (WAAs) 4042, 4055, and 4041.

#### Existing Federal Regulation

##### Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 – Jan. 31  
Sept. 15 – Jan. 31.*

#### Proposed Federal Regulation

##### Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 – Jan. 31  
Sept. 15 – Jan. 31.*

***Federal public lands of Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage but excluding the Hasselborg Lake and Hasselborg Creek drainages are closed to deer hunting Nov. 1-15, except by Federally qualified subsistence users hunting under these regulations.***

#### Why Should this regulation be changed?

This proposal is to establish a meaningful preference for the continuation of subsistence uses of deer. Angoon residents depend on deer and are experiencing difficulty meeting their subsistence needs for several reasons, including competition and user conflicts with non-Federally qualified users. Non-federally qualified users anchor boats in small bays, which inhibits access to traditional hunting areas by subsistence users. Non-federally qualified users may also decrease the success of subsistence users if they shoot deer and miss, causing the deer to be more skittish and wary.

High fuel costs, depressed economies, small boats, and inclement weather also affect the ability of Angoon residents to meet their subsistence needs. They cannot afford to have many unsuccessful hunts or to travel far from their community to hunt deer because of these safety and economic concerns. Non-federally qualified users exacerbate these concerns by obstructing access, competing for deer, and potentially altering deer behavior, all of which decrease chances of successful subsistence hunts and hinder the continuation of subsistence uses.

Subsistence hunting focuses on efficiency. The proposed two-week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons. First, the deer are still fat, providing the highest quality and amount of meat. Second, the deer are in rut, making them more susceptible to harvest. Third, weather conditions are favorable for proper meat care and processing.

This two-week closure would allow for the continuation of subsistence uses and provide a meaningful subsistence priority, enhancing opportunity for subsistence users and helping them meet their subsistence needs by eliminating competition and improving access to hunting areas during the most efficient hunting period. Additionally, the proposed closure area is limited in scope, but represents the area most hunted by Angoon residents. This closure will have an overall small effect on nonsubsistence hunters who will still have a lot of time and area to hunt deer in Unit 4, but it will have huge, inordinate benefits to the local subsistence users.

The Council also acknowledges that while tidelands are State managed lands unaffected by any Federal closures, that should not decrease the effectiveness or necessity of this proposed closure. Deer are primarily pushed to beaches by heavy snowfalls, which usually occur after the requested closure period in early November. Additionally, much of the proposed closure area is extremely steep and does not contain many beaches. Lastly, when deer are on beaches, they are usually feeding above the mean high tide line, which is under Federal jurisdiction.

Submitted by: Southeast Alaska Subsistence Regional Advisory Council  
POC: DeAnna Perry, Council Coordinator  
[deanna.perry@usda.gov](mailto:deanna.perry@usda.gov); 907-209-7817

## WP24-05

# PUBLIC SUBMISSION

<b>As of:</b> April 13, 2023
<b>Received:</b> March 28, 2023
<b>Status:</b> Posted
<b>Posted:</b> April 13, 2023
<b>Tracking No.</b> lfs-sjfh-n6q1
<b>Comments Due:</b> April 12, 2023
<b>Submission Type:</b> Web

**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0027

Comment from Southeast Alaska Subsistence Regional Advisory Council

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## Submitter Information

**Email:** [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov)

**Government Agency Type:** Regional

**Government Agency:** Southeast Alaska Subsistence Regional Advisory Council

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## General Comment

Wildlife Proposal Submission: Unit 4 Deer - Hoonah

submitted by the Southeast Alaska Subsistence Regional Advisory Council

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## Attachments

Unit 4 Deer - Hoonah Proposal

## Federal Wildlife Proposal - Hoonah

### Southeast Regional Advisory Council

#### Issue:

Close the Northeast Chichagof Controlled Use Area (NECCUA) to deer hunting by non-Federally qualified users from Nov. 1-15.

#### Existing Federal Regulation

##### Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 – Jan. 31  
Sept. 15 – Jan. 31.*

#### Proposed Federal Regulation

##### Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 – Jan. 31  
Sept. 15 – Jan. 31.*

***Federal public lands of the Northeast Chichagof Controlled Use Area are closed to deer hunting Nov. 1-15, except by Federally qualified subsistence users hunting under these regulations.***

#### Why Should this regulation be changed?

This proposal is to establish a meaningful preference for the continuation of subsistence uses of deer and is necessary for public safety. Hoonah residents depend on deer and are experiencing difficulty meeting their subsistence needs for several reasons, including competition and user conflicts with non-Federally qualified users. Non-federally qualified users flock to Hoonah on the ferry and clog the roads with their large campers, trailers, tents, and sheer number of hunters for long periods of time. This creates overcrowding and hunting safety concerns as well as inhibits access to hunting areas by subsistence users who cannot find a place to park or camp, and substantially increases competition for deer. Whitestone Harbor and Freshwater Bay are examples of areas where these issues occur. Non-federally qualified users may also decrease the success of subsistence users if they shoot deer and miss, causing the deer to be more skittish and wary. Both subsistence and nonsubsistence users prefer hunting the road system around Hoonah because it is safer than hunting by boat.

Subsistence hunting focuses on efficiency. The proposed two-week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons. First, the deer are still fat, providing the highest quality and amount of meat. Second, the deer are in rut, making them more susceptible to harvest. Third, weather conditions are favorable for proper meat care and processing.

## 2024–2026 Wildlife Proposals

### Southeast

This two-week closure would allow for the continuation of subsistence uses and provide a meaningful subsistence priority, enhancing opportunity for subsistence users and helping them meet their subsistence needs by eliminating competition and improving access to hunting areas during the most efficient hunting period. Additionally, the proposed closure area is limited in scope, but represents the area most hunted by Hoonah residents. This closure will have an overall small effect on nonsubsistence hunters who will still have a lot of time and area to hunt deer in Unit 4, but it will have huge, inordinate benefits to the local subsistence users.

Submitted by: Southeast Alaska Subsistence Regional Advisory Council  
POC: DeAnna Perry, Council Coordinator  
[deanna.perry@usda.gov](mailto:deanna.perry@usda.gov); 907-209-7817

WP24-06

# PUBLIC SUBMISSION

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<b>Posted:</b> April 13, 2023
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<b>Submission Type:</b> Web

**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0004

Comment from Southeast Alaska Subsistence Regional Advisory Council

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## Submitter Information

**Email:** deanna.perry@usda.gov

**Government Agency Type:** Regional

**Government Agency:** Southeast Alaska Subsistence Regional Advisory Council

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## General Comment

Wildlife Proposal Submission: Unit 4 Deer - Pelican

submitted by the Southeast Alaska Subsistence Regional Advisory Council

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## Attachments

Unit 4 Deer - Pelican Proposal



## Federal Wildlife Proposal - Pelican

### Southeast Regional Advisory Council

#### Issue:

Close a portion of Chichagof Island around Pelican to deer hunting by non-Federally qualified users from Nov. 1-15. The specific closure area includes Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray.

#### Existing Federal Regulation

##### Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 – Jan. 31  
Sept. 15 – Jan. 31.*

#### Proposed Federal Regulation

##### Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 – Jan. 31  
Sept. 15 – Jan. 31.*

***Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray are closed to deer hunting Nov. 1-15, except by Federally qualified subsistence users hunting under these regulations.***

#### Why Should this regulation be changed?

This proposal is to establish a meaningful preference for the continuation of subsistence uses of deer. Pelican residents depend on deer and are experiencing difficulty meeting their subsistence needs for several reasons, including competition and user conflicts with non-Federally qualified users. Non-federally qualified users anchor boats in small bays, which inhibits access to traditional hunting areas by subsistence users. Non-federally qualified users may also decrease the success of subsistence users if they shoot deer and miss, causing the deer to be more skittish and wary.

High fuel costs, depressed economies, small boats, and inclement weather also affect the ability of Pelican residents to meet their subsistence needs. They cannot afford to have many unsuccessful hunts or to travel far from their community to hunt deer because of these safety and economic concerns. Non-federally qualified users exacerbate these concerns by obstructing access, competing for deer, and potentially altering deer behavior, all of which decrease chances of successful subsistence hunts and hinder the continuation of subsistence uses.

Subsistence hunting focuses on efficiency. The proposed two-week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons. First, the deer are still fat, providing the highest quality and amount of meat. Second, the deer are in rut, making them more susceptible to harvest. Third, weather conditions are favorable for proper meat care and processing.

This two-week closure would allow for the continuation of subsistence uses and provide a meaningful subsistence priority, enhancing opportunity for subsistence users and helping them meet their subsistence needs by eliminating competition and improving access to hunting areas during the most efficient hunting period. Additionally, the proposed closure area is limited in scope, but represents the area most hunted by Pelican residents. This closure will have an overall small effect on nonsubsistence hunters who will still have a lot of time and area to hunt deer in Unit 4, but it will have huge, inordinate benefits to the local subsistence users.

The Council also acknowledges that while tidelands are State managed lands unaffected by any Federal closures, that should not decrease the effectiveness or necessity of this proposed closure. Deer are primarily pushed to beaches by heavy snowfalls, which usually occur after the requested closure period in early November. Additionally, much of the proposed closure area is extremely steep and does not contain many beaches. Lastly, when deer are on beaches, they are usually feeding above the mean high tide line, which is under Federal jurisdiction.

Submitted by: Southeast Alaska Subsistence Regional Advisory Council  
POC: DeAnna Perry, Council Coordinator  
[deanna.perry@usda.gov](mailto:deanna.perry@usda.gov); 907-209-7817

WP24-07

# PUBLIC SUBMISSION

<b>As of:</b> April 13, 2023
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<b>Submission Type:</b> Web

**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0025

Comment from Lessard, Tom

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## Submitter Information

**Name:** Tom Lessard

**Address:**

Cooper Landing, AK, 99572

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## General Comment

Clarify Subsistence Trapping Regulations for GMU 14C and 7 with language that specifically exempts otherwise lawful federal subsistence trapping from Municipality of Anchorage trapping closures on all federal lands in the area of Turnagain Arm and Portage.

In 2019 the Anchorage assembly passed AO 2019-050(S) which prohibits trapping on approximately 20 square miles of lands and waters in the Portage Valley alone, much of it federal, punishable by fines starting at \$500.00 and \$200 (see attached files).

Prior to this action by the Anchorage Assembly, the Anchorage Division of Subsistence declined to participate in the Assembly process. Following is a portion of a 2019 email correspondence explaining the refusal to participate:

Mr. Matuskowitz.

Thank you for the explanation.

Tom Lessard

----- Original Message -----

From: Matuskowitz, Theo <theo\_matuskowitz@fws.gov>

To: tlessard@mtaonline.net

Cc: Caron Mckee <caron\_mckee@fws.gov>, Doolittle, Thomas <thomas\_doolittle@fws.gov>

Sent: Mon, 22 Apr 2019 18:05:02 -0400 (EDT)

Subject: Fwd: Re: [EXTERNAL] MOA Trapping Ordinance

Mr. Lessard,

Federal Subsistence Regulations for the Take of Fish, Shellfish, and Wildlife on Federal Public Lands only apply to qualified rural residents of Alaska. As such, if a qualified rural resident is harvesting fish, shellfish, or wildlife on Federal public lands, under Federal regulations, State or municipal regulations do not apply to them (only in the discussion of "take"). Other user groups may hunt, fish, or trap on Federal public lands under state regulations, and may have further Federal agency specific regulations that apply.

This office only deals with subsistence take issues under the authority of Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Other land use issues on Federal public lands should be addressed to the specific Federal agency managing those lands.

I hope this answers your questions.

Thank you,  
Theo Matuskowitz

----- Forwarded message -----

From: THOMAS LESSARD <tlessard@mtaonline.net>  
Date: Mon, Apr 22, 2019 at 1:40 PM  
Subject: Re: Re: [EXTERNAL] MOA Trapping Ordinance  
To: Mckee, Caron <caron\_mckee@fws.gov>

Can I please get an explanation why not?  
TL

----- Original Message -----

From: Mckee, Caron <caron\_mckee@fws.gov>  
To: THOMAS LESSARD <tlessard@mtaonline.net>  
Cc: Theo Matuskowitz <theo\_matuskowitz@fws.gov>  
Sent: Mon, 22 Apr 2019 17:13:58 -0400 (EDT)  
Subject: Re: Re: [EXTERNAL] MOA Trapping Ordinance

No - there will not be federal participation in this process.

thanks,  
Caron McKee

Clearly the reason given that participation was declined was that the Municipality of Anchorage trapping closures would not apply to federally qualified subsistence users.

The requested action by the Board will clarify that the Municipality may not unilaterally eliminate customary and traditional use on federal lands.

Tom Lessard  
Cooper Landing

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## Attachments

AO 2019-050(S)

Screenshot 2023-04-12 at 3.36.20 PM

Municipal Clerk's Office

**Approved**Date: **May 7, 2019**Submitted by: Assembly Member Petersen and  
Assembly Member LaFrance

Prepared by: Assembly Counsel

For reading: May 7, 2019

**ANCHORAGE, ALASKA  
AO No. 2019–50(S)**

**AN ORDINANCE OF THE ANCHORAGE MUNICIPAL ASSEMBLY AMENDING ANCHORAGE MUNICIPAL CODE CHAPTER 14.70 AND SECTIONS 14.60.030 AND 25.70.040 TO ESTABLISH PROHIBITED TRAPPING ZONES IN THE MUNICIPALITY AND PROHIBIT TRAPPING OF GAME ANIMALS ON ALL PUBLIC LANDS OWNED BY THE MUNICIPALITY FOR THE SAFETY OF TRAIL USERS AND THEIR PETS; AND AMENDING AMC SECTION 8.55.040 TO CLARIFY THE CRIME OF TRAPPING OF ANIMALS DOES NOT APPLY TO TRAPPING OF GAME ANIMALS AS REGULATED BY THE ALASKA DEPARTMENT OF FISH & GAME.**

1 **WHEREAS**, trapping of fur bearing wildlife has been economically and culturally  
2 important to Alaska's history and people for generations, and today continues to be  
3 a popular pastime and a livelihood for some, including families that rely on the  
4 cottage industry of trapping and sewing unique and exquisite fur garments, arts and  
5 handicrafts for sale to support themselves through the winter months; and  
6

7 **WHEREAS**, the Alaska Department of Fish and Game (ADF&G) estimates there  
8 are 3,500 trappers in the state; and  
9

10 **WHEREAS**, the ADF&G recognizes that trapping activities sometimes conflict with  
11 other recreational users and their pets, evident from the "Trap Safety for Pet  
12 Owners" guide that is published by the Alaska State Department of Fish and Game,  
13 Division of Wildlife Conservation, and the Alaska Trappers Association;<sup>1</sup> and  
14

15 **WHEREAS**, State regulation (5 AAC 92.550) iterates areas closed to trapping  
16 within the Anchorage area, which includes the ADF&G defined Anchorage  
17 Management Area, Eagle River Management Area, Eklutna River and Eklutna Lake  
18 drainages within Chugach State Park except Thunderbird Creek and upstream  
19 drainages into the East Fork of Eklutna River, the Anchorage Coastal Wildlife  
20 Refuge, and most of the Joint Base Elmendorf-Richardson Management Area  
21 except as designated by the commander; and  
22

23 **WHEREAS**, there are large areas within the boundaries of the Municipality open to  
24 trapping that contain popular hiking and public use trails, and the closed areas as  
25 designated by the ADF&G are subject to change each season by the Board of Fish  
26 & Game;

27 **WHEREAS**, members of the Alaska House of Representatives have in the past  
28 proposed bills to restrict trapping within a buffer zone of certain public areas, and to  
29 allow municipalities to regulate trapping within their boundaries for good cause,

<sup>1</sup> [http://www.adfg.alaska.gov/static/hunting/trapping/pdfs/trap\\_safety\\_for\\_pet\\_owners.pdf](http://www.adfg.alaska.gov/static/hunting/trapping/pdfs/trap_safety_for_pet_owners.pdf)

1 which includes public safety and protecting people or pets from injury or damage;  
2 and

3  
4 **WHEREAS**, the Matanuska-Susitna Borough recently passed an ordinance  
5 restricting trapping on certain public lands and trails;

6  
7 **WHEREAS**, even with these regulations, each year there are reports of pets in off-  
8 leash areas being ensnared in legally set traps near public trails in Anchorage, and  
9 they pose a risk to children and recreational users and families with children and  
10 pets whom may frequently; and

11  
12 **WHEREAS**, as a home rule municipality, the Municipality of Anchorage has all  
13 legislative powers not prohibited by law or charter, and under such authority may  
14 regulate use of lands within its boundaries as reasonable and necessary for the  
15 public safety and welfare; and

16  
17 **WHEREAS**, the Assembly desires to create buffer zones to protect the public  
18 safety and welfare within its boundaries, and does not intend to regulate trapping of  
19 game, seasonal periods, gear restrictions or other aspects of this traditional  
20 Alaskan pastime; now, therefore

21  
22 **THE ANCHORAGE ASSEMBLY ORDAINS:**

23  
24 **Section 1.** Anchorage Municipal Code chapter 14.70 is hereby amended to add  
25 a new section to read as follows:

26  
27 **14.70.200 Prohibited trapping zones for safe trails.**

28  
29 A. It is unlawful for any person to knowingly or negligently place a trap,  
30 or attempt to place a trap, in a prohibited trapping zone. Where  
31 trapping is otherwise permitted by the Alaska Department of Fish and  
32 Game or Board of Game regulations, the municipality’s prohibited  
33 trapping zones are within:

- 34 1. 50 yards of developed ~~[or public use]~~ trails, **excluding off-**  
35 **shoot trails**; and  
36 2. one-quarter mile of trailheads, campground, and permanent  
37 dwellings.

38  
39 B. **The assembly may establish a list of “developed trails” by**  
40 **resolution for purposes of this section, and the list, if adopted,**  
41 **shall be posted on the municipal web site. Failure to list a trail**  
42 **that otherwise meets the definition of “developed trail” in this**  
43 **section does not mean the prohibited trapping zone is**  
44 **inapplicable.**

45  
46 C. All game traps and snares **set within the municipality** shall be  
47 marked with a trapper identification number issued by the State of  
48 Alaska or **with** contact information for the owner of the trap or snare.  
49

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**D[C]. This section shall not apply to any official of the United States, the state, or the municipality who is authorized to trap animals in the course of official duties.**

**E.** Definitions.

“Developed trail” means any trail or footpath designated under AS 41.21.850 *et seq.*, or marked, signed or designated by the municipality, **excluding off-shoot trails. Any trailhead with a graded parking area and signage is a developed trail and the prohibited trapping zone extends the length of the mainstem(s) of the trail(s).**

“Game” has the meaning in the Alaska Fish and Game Code, AS 16.05.940.

**“Off-shoot trail” is a secondary and unmarked trail with indicia of less frequent usage, maintenance, or development than the mainstem(s) of a developed trail.**

~~“Public use trail” means a footpath or way on any public land clearly discernible and exhibiting characteristics of common and frequent use, that is open to public use as a matter of right.~~

“Trapping” means the taking of mammals declared by Alaska Department of Fish and Game or Board of Game regulation to be furbearers. For purposes of this section, trapping includes placing or setting of a trap, and it does not include the possession or transportation of traps.

**F[D].** Violation of this section shall be punishable by a civil penalty in accordance with chapter 14.60.

**Section 2.** Anchorage Municipal Code section 14.60.030 is hereby amended to read as follows (*the remainder of the section is not affected and not set out*):

**14.60.030 - Fine schedule.**

The fine schedule under this chapter is as follows:

Code Section	Offense	Penalty / fine
***	***	***
<u>14.70.200A.</u>	<u>Trapping or attempting to trap in prohibited zone</u>	<u>500.00</u>
<u>14.70.200B.</u>	<u>Failure to mark trap or snare</u>	<u>200.00</u>
***	***	***



1 (AO No. 93-167(S-1), § 1, 4-13-94; AO No. 94-108, § 1, 10-5-94; AO No. 94-  
2 134, § 2, 9-8-94; AO No. 95-42, § 2, 3-23-95; AO No. 95-67(S), § 9, 7-1-95;  
3 AO No. 95-102, § 1, 4-26-95; AO No. 95-118, § 3, 9-1-95; AO No. 95-  
4 163(S), § 21, 8-8-95; AO No. 95-195(S-1), 1-1-96; AO No. 96-51(S-1), § 2,  
5 8-1-96; AO No. 96-96(S-1), § 2, 2-1-97; AO No. 96-126(S), § 3, 10-1-96; AO  
6 No. 96-137(S), § 9, 1-2-97; AO No. 97-88, § 3, 6-3-97; AO No. 97-107, § 3,  
7 11-17-97; AO No. 97-133(S), § 1, 11-11-97; AO No. 98-27(S-1), § 2, 11-11-  
8 97; AO No. 98-160, § 2, 12-8-98; AO No. 99-13(S), 2-9-99; AO No. 99-91(S),  
9 § 4, 7-13-99; AO No. 2000-64, § 1, 4-18-00; AO No. 2000-116(S), § 4, 7-18-  
10 00; AO No. 2000-127(S), § 2, 10-14-00; AO No. 2000-129(S), § 26, 11-21-  
11 00; AO No. 2001-48, § 1, 3-13-01; AO No. 2001-74(S), § 2, 4-17-01; AO No.  
12 2001-4, § 2, 2-6-01; AO No. 2001-145(S-1), § 11, 12-11-01; AO No. 2003-  
13 68, § 1, 9-30-03; AO No. 2003-97, § 4, 9-30-03; AO No. 2003-117, § 2, 1-28-  
14 03; AO No. 2003-130, § 8, 10-7-03; AO No. 2003-152S, § 10, 1-1-04; AO  
15 No. 2004-1, § 2, 1-1-03; AO No. 2004-99, § 2, 6-22-04; AO No. 2004-100(S-  
16 1), § 6, 1-1-05; AO No. 2004-171, § 1, 1-11-05; AO No. 2005-160, § 9, 11-1-  
17 05; AO No. 2005-84(S), § 3, 1-1-06; AO No. 2005-185(S), § 35, 2-28-06; AO  
18 No. 2005-124(S-1A), § 33, 4-18-06; AO No. 2006-39, § 6, 4-11-06; AO No.  
19 2006-54, § 1, 5-2-06; AO No. 2006-80, § 1, 6-6-06; AO No. 2007-50, § 4, 4-  
20 10-07; AO No. 2007-60, § 4, 11-1-07; AO No. 2007-70, § 3, 5-15-07; AO No.  
21 2008-84(S), § 5, 7-15-08; AO No. 2009-61, § 3, 7-7-09; AO No. 2009-82, §  
22 5, 7-7-09; AO No. 2009-40(S), § 3, 7-21-09; AO No. 2009-112, § 4, 10-13-  
23 09; AO No. 2009-122, § 2, 12-17-09; AO-2010-35(S), § 7, 5-11-10; AO No.  
24 2010-39, § 2, 5-11-10; AO No. 2010-87(S), § 3, 12-7-10; AO No. 2011-46, §  
25 4, 4-12-11; AO No. 2011-59, § 10, 5-24-11; AO No. 2011-106(S), § 3, 11-8-  
26 11; AO No. 2011-112, § 4, 11-22-11, eff. 12-22-11; AO No. 2012-10, § 1, 1-  
27 31-12; AO No. 2012-77, § 29, 8-7-12; AO No. 2013-109(S-1), § 5, 12-3-13;  
28 AO No. 2013-130(S-1), § 1, 1-14-14; AO No. 2014-42, § 31, 6-21-14; AO  
29 No. 2014-85, § 4, 8-5-14; AO No. 2014-110(S), § 2, 9-9-14; AO No. 2014-  
30 137(S), § 3, 11-18-14; AO No. 2015-23(S), § 20, 3-24-15; AO No. 2015-48,  
31 § 16, 5-14-15 ; AO No. 2015-54, § 1, 5-26-15 ; AO No. 2015-65, § 4, 6-9-15 ;  
32 AO No. 2015-111(S-1), § 2, 1-1-16 ; AO No. 2016-16(S), § 4, 2-9-16 ; AO  
33 No. 2016-76(S), § 7, 7-12-16 ; AO No. 2016-81(S), § 4, 8-25-16 ; AO No.  
34 2016-83(S), § 9, 7-26-16 ; AO No. 2016-82 , § 3, 8-9-16; AO No. 2016-116 ,  
35 § 2, 10-18-16; AO No. 2016-115(S) , § 2, 11-15-16; AO No. 2016-124(S) , §  
36 11, 12-20-16; AO No. 2017-26 , § 2, 5-1-17; AO No. 2017-29(S) , § 61, 6-1-  
37 17; AO No. 2017-30 , § 3, 3-21-17; AO No. 2017-31(S) , § 5, 5-26-17; AO  
38 No. 2017-119(S) , § 4, 11-9-17; AO No. 2017-101 , § 2, 2-5-18; AO No.  
39 2017-161(S) , § 3, 2-27-18)

40  
41 **Section 3.** Anchorage Municipal Code section 25.70.040 is hereby amended to  
42 read as follows:  
43

44 **25.70.040. Prohibited activities generally.**

- 45  
46 A. Except in areas specifically designated for such use in accordance  
47 with law, no person may engage in any of the following activities on  
48 municipal land:  
49 1. Camping.

- 1 2. Building fires.  
 2 3. Operating motor vehicles of any kind.  
 3 4. Constructing trails.  
 4 5. Discharging firearms where there is a reasonable likelihood  
 5 people, domestic animals, or property may be jeopardized.  
 6 6. Shooting into municipal land from beyond its boundaries where  
 7 there is a reasonable likelihood people, domestic animals, or  
 8 property may be jeopardized.  
 9 7. Cutting or otherwise damaging live trees, shrubbery, brush or  
 10 other vegetation.  
 11 8. Removing soil, rocks, gravel or plants of any kind.  
 12 9. Constructing structures of any kind.  
 13 10. Sport or commercial hunting or trapping of ~~wild or~~ game  
 14 animals.  
 15  
 16 B. On any municipal land, no person may, except as otherwise  
 17 authorized by law:  
 18 1. Kill or injure any animal unless such act is necessary to protect  
 19 a human being or domesticated animal from attack.  
 20 2. Harass, torment, poison, provoke, trap or abuse any animal.  
 21 3. Interfere with, obstruct, mutilate, conceal or tear down any  
 22 official notice, sign or placard posted by any municipal officer  
 23 or employee.  
 24 4. Knowingly destroy or injure any public property.  
 25 5. Dump, abandon, throw, scatter or burn litter, garbage, rubbish  
 26 or junk.  
 27 6. Break bottles or other glass containers in such manner that  
 28 fragments of glass may be strewn upon the ground.  
 29

30 (AO No. 79-170; AO 2006-39, § 7, 4-11-06)  
 31

32 **Section 4.** Anchorage Municipal Code section 8.55.040 is hereby amended to  
 33 read as follows:  
 34

35 **8.55.040. Trapping of animals.**  
 36

- 37 A. It is unlawful for any person, with criminal negligence, to use any type  
 38 of trap, such as steel jaw traps, snares or spring traps that might  
 39 physically harm an animal, to capture animals for noncommercial  
 40 reasons.  
 41 1. Any humane-type trap used for the purposes of capture of  
 42 animals shall be monitored by the person using it at least once  
 43 every 12 hours. Any animal captured shall be cared for in a  
 44 humane manner and returned to the animal's owner, an animal  
 45 control officer, or the animal care and control center.  
 46 2. No person may use any trap for capture of domestic animals  
 47 and noncommercial purposes of a type not approved by the  
 48 chief animal control officer or designee.  
 49 3. No person may offer false information to any peace officer or

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animal control authority concerning the identity or ownership of a trapped animal the person has trapped.


B. This section does not apply to prevent, prohibit or regulate sport or commercial trapping of ~~wild or~~ game animals authorized by this code, state, or federal law. This section does not apply to trapping for purposes of rodent or nuisance animal control.

C. Violation of this section is a class A misdemeanor.

(AO No. 96-134(S-2), §§ 19, 52, 7-1-97; AO No. 98-59(S), § 2, 5-19-98; AO No. 2003-77, § 1, 5-20-03; AO No. 2014-42, §§ 8, 54, 6-21-14)

**Section 5.** This ordinance shall become effective 30 days after passage and approval by the Assembly.

PASSED AND APPROVED by the Anchorage Assembly this 7th day of May, 2019.

  
Chair

ATTEST:

  
Municipal Clerk

**About**

This map is an **approximate representation** of areas within the Municipality of Anchorage where trapping is restricted per AO No. 2019-50(s).

Municipal Ordinance 2019-50 prohibits the placement of traps in areas, where trapping is otherwise permitted by ADF&G, within 50-yards of a developed trail (excluding offshoot trails) and areas within 1/4 mile of trailheads, campgrounds, and permanent dwellings. This also includes Municipal owned property.

The areas closed to trapping are reliant on data from different sources and different update cycles. Additional information can be found in the data sources link.

[Click here to download list of trails displayed on this map\\*](#)

\*current list of trails combines ADNIR and USFS trail information and does not include trails managed by other entities

Earthstar Geographics | Kenai Peninsula Borough, Municipal  
Portage Lake

Find address or place

Scale: 148,916,608.830 Degrees

WP24-08

## PUBLIC SUBMISSION

<b>As of:</b> April 13, 2023
<b>Received:</b> April 10, 2023
<b>Status:</b> Posted
<b>Posted:</b> April 13, 2023
<b>Tracking No.</b> lgb-9nsl-g1kz
<b>Comments Due:</b> April 12, 2023
<b>Submission Type:</b> Web

**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0020

Comment from Alaska Wildlife Alliance

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### Submitter Information

**Email:** nicole@akwildlife.org

**Organization:** Alaska Wildlife Alliance

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### General Comment

Please see our proposal attached below and thank you for your consideration.

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### Attachments

AWA FSB Cooper Landing Bypass proposal

## Federal Subsistence Board Proposal

**Name:** Nicole Schmitt

**Phone:** 907-917-9453

**Email:** [nicole@akwildlife.org](mailto:nicole@akwildlife.org)

**Address:** PO Box 202022, Anchorage AK 99520

**Organization:** Alaska Wildlife Alliance

### Regulations we wish to change:

We seek to align State and Federal regulations that establish ¼ mile setbacks of taking game from new wildlife crossing structures on the Sterling Highway.

### The proposed regulation written:

Alaska Administrative Code Number 5 AAC:

5 AAC 92.510. Areas closed to hunting

5 AAC 92.550. Areas closed to trapping

Close areas to hunting, trapping, and taking game within 1/4 mile of wildlife crossings on the Sterling Highway in Units 7 and 15. This would Federal regulations with the Board of Game passage of [proposal 145](#) at the Southcentral meeting in March 2023.

### Explanation of why this regulation change should be made:

The Sterling Highway MP 45-60 Project (aka Cooper Landing Bypass) includes more than \$10.5 million in mitigation for wildlife crossings including 4 underpasses and the first overpass in Alaska. Two underpasses are in GMU 15A between Jim's Landing and Sportsman's Landing along the existing highway; two underpasses and one vegetated overpass are in GMU 7 between Sportsman's Landing and Cooper Landing along the new bypass.

These structures are expected to help reduce moose-vehicle collisions (that average more than \$35,000 per incident in damage, injury and sometimes human death according to the Alaska Moose Federation) and allow for other wildlife species to move unimpeded across a road segment that currently averages > 1.2 million vehicles per year.

Cameras installed to monitor similar wildlife underpasses on the adjacent Sterling Highway MP 58-79 through the Kenai National Wildlife Refuge have already documented use by moose, lynx, snowshoe hare, brown and black bears, porcupine, caribou, river otter, ermine, mink, ducks and sandhill cranes. More wildlife use is expected once game trails become well established, a likely outcome because trapping and hunting around those structures are

incidentally prohibited by other safety restrictions imposed by the Refuge near roads, campgrounds, trailheads, and buildings.

However, the new structures being installed on the Sterling Highway MP 45-60 project do not have limitations on hunting of federally qualified users while wildlife use them. Without a change in regulation, hunting and trapping would be permitted on and at the entrance/exit of multi-million dollar structures meant to create safe passage across the highway; these underpasses and this bypass, meant to benefit wildlife, could turn into population sinks.

We submitted this proposal to the State in 2022, and received over 300 public comments in support of the action, including support from agencies such as Department of Transportation, US Forest Service, and the Cooper Landing Planning Advisory Commission. In March 2023, the proposal was unanimously passed by the Alaska Board of Game after being amended to include the closure of taking of game within the ¼ mile crossing buffer (ie, a person cannot stand outside the ¼ setback and shoot in ; no taking of game is permitted within ¼ mile of these structures). Passing this proposal would align Federal and State regulations. The State proposal can be found as Proposal 145, here: <https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2022-2023/proposals/145.pdf>

We seek to ensure that the \$10+ million investment of public funds to help wildlife navigate an increasingly congested part of the Kenai Peninsula is honored by State hunting and trapping regulations.

**Any additional information that you believe will help the Federal Subsistence Board (Board) in evaluating the proposed change:**

This proposal is supported by the Department of Transportation, US Forest Service, and Cooper Landing Advisory Planning Commission. The Forest Service and Cooper Landing Planning Advisory Commission letters of support can be found as PC343 and PC059 respectively in the Board of Game comment index available here: [https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2022-2023/sc/pc\\_comments\\_all.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2022-2023/sc/pc_comments_all.pdf). A letter of support from the Department of Transportation can also be submitted during the public comment period.

**WP24-09**

Marnie Graham, Glennallen Field Office Manager  
 Bureau of Land Management  
 P.O. Box 147  
 Glennallen, Alaska 99588  
 Phone: 907-822-3217  
 Fax: 907-822-7335

**What regulations you wish to change. Include management unit number and species. Quote the current regulation if known. If you are proposing a new regulation, please state, “new regulation.”**

The Bureau of Land Management (BLM) Glennallen Field Office would like to remove the current delegated authority currently in the Unit 13A and 13B unit-specific regulations for caribou and put them into a Delegation of Authority Letter and expand the Scope of the Delegation authorized to the Glennallen Field Office Manager. BLM also requests that the harvest limit for caribou be changed from “2 caribou” to “up to 2 caribou”

**Current Federal Regulation****Unit 13A and 13B–Caribou**

*Unit 13A and 13B-2 caribou by Federal registration permit (FC1302) only. Aug. 1 - Sept. 30*  
*The sex of animals that may be taken will be announced by the BLM Oct. 21 - Mar. 31*  
*Glennallen Field Office Manager in consultation with the ADF&G Area*  
*Biologist and Chairs of the Eastern Interior Alaska Subsistence Regional*  
*Advisory Council and the Southcentral Alaska Subsistence Regional*  
*Advisory Council.*

**Proposed Federal Regulation****Unit 13A and 13B–Caribou**

*Unit 13A and 13B- “up to 2” caribou by Federal registration permit Aug. 1 - Sept. 30*  
*(FC1302) only. The sex of animals that may be taken will be announced by Oct. 21 - Mar. 31*  
~~*the BLM Glennallen Field Office Manager in consultation with the ADF&G*~~  
~~*Area Biologist and Chairs of the Eastern Interior Alaska Subsistence*~~  
~~*Regional Advisory Council and the Southcentral Alaska Subsistence*~~  
~~*Regional Advisory Council.*~~



BLM requests that the Federal Subsistence Board expand the **Scope of Delegation** to include the following: *close, reopen, and adjust season dates, set harvest limits including any needed sex restrictions, and set any needed permit conditions* for the Federal FC1302 caribou hunt in Units 13A and 13B. BLM also requests that the Ahtna Intertribal Resource Commission be added as a party to be consulted/notified when BLM chooses to exercise the requested delegated authority.

BLM believes that an expansion of Delegated Authority is needed to better manage the Nelchina Caribou Herd and respond to changing hunt conditions in an in-season manner. Removing the current limited authority from the unit-specific regulations into a Delegation of Authority Letter will help to simplify Federal regulations and more explicitly describe the requirements needed for the BLM to exercise this delegated authority when needed.

BLM also requests that the harvest limit be changed due to conservation concerns for the Nelchina Caribou Herd (NCH). A severe winter and late spring in 2022 resulted in higher than normal adult mortality and low recruitment of calves into the NCH population. Additionally, a summer 2022 population estimate of 21,000 animals is of concern as it is well below the State management objective of 35,000 to 40,000 caribou. Allowing for flexibility in determining the Federal harvest limit will make it possible for BLM managers to respond to ongoing fluctuations in the NCH population.

## WP24-10

Amy Peterson

[apeterson@koniag.com](mailto:apeterson@koniag.com)

907-370-3100

Koniag, Community Affairs Liaison

### **Requirement:**

As stated on page 21 General Provisions of the 2022/2024 Federal Subsistence Wildlife Regulations Unit 8(i), a State Locking Tag is required for brown bear subsistence permits.

## General Provisions

### Brown Bear Permit and Tag Requirements

UNIT OR PORTION	REQUIREMENTS		
	STATE Registration Permit	FEDERAL Registration Permit	State Locking Tag
Unit 1	Yes	No	Yes
Unit 4	Yes	No	Yes
Unit 5	No	Yes	No - Federal exempt
Unit 8 Kodiak Shelikoff Area	No	Yes	Yes
Unit 9B, Lake Clark National Park and Preserve	No	Yes	No - Federal exempt
Unit 9B remainder	Yes	No	No - State exempt
Unit 9C	Yes	Yes	Yes
Unit 9E	No	Yes	No - Federal exempt

### **Proposed Change:**

On page 21 General Provisions of the 2022/2024 Federal Subsistence Wildlife Regulations Unit 8 under the State Locking Tag section, we propose it reads:

**State locking tag: NO- federal exempt**

**(8)(i) Unit specific regulations: (B) You may hunt brown bear in Unit 8 with a Federal registration permit in lieu of a State locking tag if you have obtained a Federal registration permit prior to hunting.**

Explanation of requested change:

The Kodiak National Wildlife Refuge and the Kodiak Island Tribal Councils are requesting that the requirement to obtain a State Locking Tag be changed.

1. The state locking tag costs \$25.00 each. The state locking tags are only valid until December 31<sup>st</sup> of the current year. If an approved permitted hunter attempts to hunt their customary & traditional use/subsistence permit during the open season of December 1-December 15 and are unsuccessful, they will in turn need to purchase another \$25.00 state locking tag for the spring hunt. If the approved permitted hunter is unsuccessful in both the winter and spring season, they are out the money for the tags as well as the fuel costs etc.
2. Customary traditional/subsistence hunting in our rural communities is never to benefit oneself. All hunted or fished species are shared throughout the entire community as well as sent to other villages. Our local airline, Island Air, is gracious enough to honor the value in subsisting by providing free shipping on all subsisted foods. The cost of gas, equipment, and maintaining equipment has caused many individuals in our rural communities to no longer own skiffs, Hondas etc. Each rural community has a pool of steady individuals that continue to carry on these traditions/provide and teach youth for their communities and the added cost of the state locking tags defeats the purpose of the customary & traditional/subsistence practices.
3. As you can see from above, there are three surrounding units that do not require the state locking tags: Unit 5 and two sections of Unit 9. It is not clear why Unit 8 would require it when the neighboring units do not have the same requirement. Unit 8 provides 13 brown bear subsistence permits, which to date are not fully utilized each year. Removing the state locking tag requirement may improve this great opportunity for future customary & traditional/subsistence hunts.

Thank you for your time and consideration on this matter. Please see the attached letters of support from our Kodiak Island Tribal Councils.

CUSTOMARY & TRADITIONAL USE DETERMINATION	HARVEST LIMITS	OPEN SEASONS
<b>BROWN BEAR</b>		
<ul style="list-style-type: none"> <li>• Residents of Akhiok, Larsen Bay, Karluk, Old Harbor, Ouzinkie, and Port Lions</li> </ul>	1 bear by Federal registration permit (FB0802) only, issued by the Kodiak National Wildlife Refuge Manager and per community as follows:  Akhiok—2 permit; Karluk—1 permit; Larsen Bay—Up to 3 permits; Old Harbor—Up to 3 permits; Ouzinkie—Up to 2 permits; and, Port Lions - Up to 2 permits.	Dec. 1 - Dec. 15 Apr. 1 - May 15



March 24, 2023

Alex Cleghorn, President  
Tangirnaq Native Village  
3449 East Rezanof Drive  
Kodiak, AK 99615

**RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement**

Dear Federal Subsistence Management Board:

The Kodiak region encompasses the Kodiak Archipelago and a portion of the Alaska Peninsula. Approximately 1,800 Alutiiq/Sugpiaq reside in the Archipelago and include ten federally recognized Tribes. Throughout Sugpiaq history it is customary to share with the next generation the traditions that were followed by our ancestors. For over 7,500 years the Alutiiq/ Sugpiaq will continue to be the primary stewards of air, land, and sea.

The Tangirnaq Native Village, along with the Kodiak National Wildlife Refuge and the Kodiak Regional tribes, implore you to support the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost burden to the approved permitted hunter. Additionally, requiring a cost defeats the purpose of customary and traditional/subsistence hunting. Currently, the customary & traditional hunt permits in our rural communities are underutilized. Please help us to maintain our cultural traditions in a way that is not a cost burden to the hunters and that allows for these traditions to be passed down for generations to come. **[Please see attached proposal]**

We thank you in advance for this consideration and anticipate the proposed changes are approved.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Cleghorn", is written over a light blue horizontal line.

Alex Cleghorn, President



Traditional Tribal Council  
P.O. Box 69, Port Lions, Alaska 99550  
[PORTLIONSTRIBE.NET](http://PORTLIONSTRIBE.NET)

March 22, 2023

Nancy Nelson  
Port Lions Traditional Tribal Council  
PO Box 69  
Port Lions, AK 99550

RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

Dear Federal Subsistence Management Board:

The Koniag region encompasses the Kodiak Island area and a portion of the Alaska Peninsula. Approximately 1800 Alutiiq/Sugpiaq live on Kodiak Island. Kodiak Island includes 10 Tribes throughout the archipelago. A customary and traditional lifestyle is a daily teaching in the Alutiiq Sugpiaq culture. For over 7,500 years the Alutiiq Sugpiaq have and will continue to be the primary stewards of air, land, and sea.

As a Tribe in the Koniag region, we reach out to you today in support of the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost to the approved permitted hunter. Additional costs defeat the purpose of customary & traditional/subsistence hunting. Currently, the customary & traditional hunt permits are underutilized in our rural communities. Let's work together to keep cultural traditions alive in our rural communities. **[Please see attached proposal]**

We appreciate your time and attention to this matter and look forward to the proposed changes being approved.

Sincerely,

Nancy Nelson  
Port Lions Traditional Tribal Council President  
Native Village of Port Lions





*Native Village of Ouzinkie*  
*PO Box 130*  
*Ouzinkie Ak. 99644*  
*907-680-2259 or 2217*  
[Administrator@ouzinkie.org](mailto:Administrator@ouzinkie.org)

Robert Boskofsky Sr.

Native Village of Ouzinkie

PO Box 130

Ouzinkie, AK 99644

RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

Dear Federal Subsistence Management Board:

The Koniag region encompasses the Kodiak Island area and a portion of the Alaska Peninsula. Approximately 1800 Alutiiq/Sugpiaq live on Kodiak Island. Kodiak Island includes 10 Tribes throughout the archipelago. A customary and traditional lifestyle is a daily teaching in the Alutiiq Sugpiaq culture. For over 7,500 years the Alutiiq Sugpiaq have and will continue to be the primary stewards of air, land, and sea.

As a Tribe in the Koniag region, we reach out to you today in support of the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost to the approved permitted hunter. Additional costs defeat the purpose of customary & traditional/subsistence hunting. Currently, the customary & traditional hunt permits are underutilized in our rural communities. Let's work together to keep cultural traditions alive in our rural communities.

**[Please see attached proposal]**

We appreciate your time and attention to this matter and look forward to the proposed changes being approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Boskofsky Sr.", written over a horizontal line.

Robert Boskofsky Sr- President, Native Village of Ouzinke



**Native Village of Afognak** *To embrace, protect, develop,  
and enhance Alutiiq culture, protect our traditional use areas and encourage unity among the  
Alutiiq of the Kodiak Archipelago*

March 21, 2023

Jonana "JJ" Orloff  
Native Village of Afognak  
115 Mill Bay Road  
Kodiak, AK 99615

**RE:** Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

Dear Federal Subsistence Management Board:

The Koniag region encompasses the Kodiak Island area and a portion of the Alaska Peninsula. Approximately 1800 Alutiiq/Sugpiaq live on Kodiak Island. Kodiak Island includes 10 Tribes throughout the archipelago. A customary and traditional lifestyle is a daily teaching in the Alutiiq Sugpiaq culture. For over 7,500 years the Alutiiq Sugpiaq have and will continue to be the primary stewards of air, land, and sea.

As a Tribe in the Koniag region, we reach out to you today in support of the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost to the approved permitted hunter. Additional costs defeat the purpose of customary & traditional/subsistence hunting. Currently, the customary & traditional hunt permits are underutilized in our rural communities. Let's work together to keep cultural traditions alive in our rural communities. **[Please see attached proposal]**

We appreciate your time and attention to this matter and look forward to the proposed changes being approved.

Sincerely,

JJ Orloff  
Tribal Administrator

---

115 Mill Bay \* Kodiak, AK 99615 \* phone 907-486-6357 \* fax 907-486-6529



## ALUTIIQ TRIBE OF OLD HARBOR

PO Box 62, Old Harbor AK 99643  
Phone: (907)286-2215 Fax (907)286-2350  
Website: Alutiiqtribeoh.org

March 21, 2023

Stella Krumrey, Tribal Chief/President  
PO Box 62  
Old Harbor, AK 99643

RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

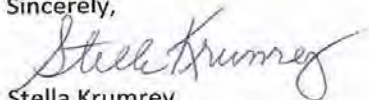
Dear Federal Subsistence Management Board:

The Koniag region encompasses the Kodiak Island area and a portion of the Alaska Peninsula. Approximately 1800 Alutiiq/Sugpiaq live on Kodiak Island. Kodiak Island includes 10 Tribes throughout the archipelago. A customary and traditional lifestyle is a daily teaching in the Alutiiq Sugpiaq culture. For over 7,500 years the Alutiiq Sugpiaq have and will continue to be the primary stewards of air, land, and sea.

As a Tribe in the Koniag region, we reach out to you today in support of the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost to the approved permitted hunter. Additional costs defeat the purpose of customary & traditional/subsistence hunting. Currently, the customary & traditional hunt permits are underutilized in our rural communities. Let's work together to keep cultural traditions alive in our rural communities. **[Please see attached proposal]**

We appreciate your time and attention to this matter and look forward to the proposed changes being approved.

Sincerely,



Stella Krumrey  
Tribal Chief/President  
Alutiiq Tribe of Old Harbor

---

“Old Harbor is a community based in rich traditions that come together to celebrate its people, culture, and heritage. We demonstrate this through our language, arts, traditional dancers and spiritual history and our respect for the Elders and honoring of our children.”



## WP24-11

# PUBLIC SUBMISSION

<b>As of:</b> April 13, 2023 <b>Received:</b> April 10, 2023 <b>Status:</b> Do Not Post <b>Tracking No.</b> lgb-851c-uv5g <b>Comments Due:</b> April 12, 2023 <b>Submission Type:</b> Web
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**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-DRAFT-0024

Comment from FWS

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## Submitter Information

**Email:** Michael\_Brady@fws.gov

**Government Agency Type:** Federal

**Government Agency:** FWS

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## General Comment

See attachment

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## Attachments

ProposedChange\_DeerHarvestLimits\_Unit8\_KodiakNWR.final

Proposer: Kodiak National Wildlife Refuge, 1390 Buskin River Road, Kodiak, AK 99615  
contact: Michael Brady, Refuge Manager; 907-487-0225; [michael\\_brady@fws.gov](mailto:michael_brady@fws.gov)

Unit, Species, and Section: Unit 8, (Sitka Black-tailed) Deer, harvest limits

Current Regulation (harvest limits):

All lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak Islands—3 deer; however, antlerless deer may be taken only from Oct. 1 - Jan. 31.

Proposed Regulation Change (harvest limits):

All lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak Islands—3 deer; ~~however, antlerless deer may be taken only from Oct. 1 - Jan. 31.~~

Explanation: The prohibition on harvest of antlerless deer between Aug. 1 – Sep. 30 unnecessarily limits deer harvest opportunity by residents of Unit 8. There is no biological basis for this restriction of which we are aware. The current regulation, set in 2002, was based on anecdotal information indicating that the deer population had crashed in response to severe winters in the late 1990s. The intent of the restriction was to increase survival of antlerless deer (does, yearlings, and fawns) during the first two months of the hunting season. The restriction likely had a negligible effect on deer survival because severe winters are the primary factor that influence survival in remote Federal public lands, and most hunting of deer on those lands occurs during the period of deer rut between late October and early December. Furthermore, results of Kodiak National Wildlife Refuge surveys indicated that intensive deer use of key winter browse (e.g., red elderberry) first documented in 2017 was sustained through 2022, which suggests that the population has not decreased. In conclusion, the effect of the proposed change would be to increase harvest opportunity for rural residents with no expected substantive effect on deer survival or population size.

WP24-12

9/22/22, 10:31 AM

Mail - Grediagin, Lisa M - Outlook

Unit 9B Fall Moose Date Discrepancy

Grediagin, Lisa M <Lisa\_Grediagin@fws.gov>

Thu 9/22/2022 10:27 AM

To: Lavine, Robbin M <robbin\_lavine@fws.gov>;jakefries@gmail.com <jakefries@gmail.com>

Hi Jake,

Thanks for submitting a special action request concerning the moose season in Unit 9B. OSM actually received a similar request a few weeks ago. We decided to defer both requests to the next wildlife regulatory cycle to become proposals. Special action requests require a time-sensitive emergency, and aligning State and Federal moose seasons does not qualify as a time-sensitive emergency.

You should receive an official letter from our office with this information, but that takes time due to various levels of review and government bureaucracy. So, I just wanted to let you know as soon as possible the response to your request.

Thanks, and please let me know if you have any questions about this,

Lisa

~~~~~

Lisa (Maas) Grediagin  
Supervisory Wildlife Biologist  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, AK  
907-786-3357 (office)  
907-602-8878 (cell)

---

**From:** Jake <jakefries@gmail.com>  
**Sent:** Monday, September 19, 2022 8:42 PM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Unit 9B Fall Moose Date Discrepancy

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

My name is Jake Fries and I'm a subsistence hunter in Port Alsworth, AK unit 9B (PO Box 182). This year, the state of Alaska released new regulations that extend the moose hunting season to September 25th (page 66 in Alaska hunting regulations booklet). I was looking at the Federal Subsistence for 9B (page 53 in the subsistence regulations) and the season still says it ends September 20th.

<https://outlook.office365.com/mail/sentitems/id/AAQkADJhY2M2YTk5LTAwNTktNGM5Yi05MDBiLTlxOWNjNmY5ZmYwYQAQAN%2BX3YTCbQVOvx...> 1/2

9/22/22, 10:31 AM

Mail - Grediagin, Lisa M - Outlook

I would like to request a Special Action to extend the federal subsistence regulations to September 25th for bull moose in 9B instead of September 20th. These moose are harvested under the state tag RM272.

Thank you for your time and for all your help and have a great day.

Jake Fries  
PO Box 182, Port Alsworth, AK 99653  
907-781-3071  
[jakefries@gmail.com](mailto:jakefries@gmail.com)

<https://outlook.office365.com/mail/sentitems/id/AAQkADJhY2M2YTk5LTAwNTktNGM5Yi05MDBiLTlxOWNjNmY5ZmYwYQAQAN%2BX3YTCbQVOvx...> 2/2

## WP24-13

8/29/22, 9:18 AM

Mail - Lavine, Robbin M - Outlook

[EXTERNAL] special action request

Warren Hill <warren.salmon@hotmail.com>

Fri 8/26/2022 2:56 PM

To: Lavine, Robbin M <robbin\_lavine@fws.gov>

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Hello Robbin, I sent a special action request to subsistence@fws.gov and cc'd you as directed by a local authority but the email failed to send to you so I am re-sending you the original text to ensure it goes through. I apologize for any redundancy or confusion.

Original Text:

To whom it may concern, In preparation for the upcoming moose hunting season in my local unit of 9B I noticed an irregularity between the allowed open hunting days in the State vs the Federal lands regulations. The states most recent regulations booklet allows for the taking of any bull by residents in unit 9B during Sept 1st-25th. The Federal/Subsistence regulations have a shorter more restrictive open hunting period of Sept 1st-20th in unit 9B. As a qualified subsistence hunter in Federal lands in unit 9B I am requesting a special action be taken to align the Federal open hunting dates with the States open dates of Sept 1st-25. Furthermore, the States reasoning for extending the moose hunt was in part to make up for the loss of the caribou hunt and allow for more harvest opportunity which should also apply to Federal lands.

I am a board member for the Iliamna area Subsistence Resource Committee and I will suggest taking action on this same issue at our upcoming meeting. Unfortunately, our next meeting won't occur until after the fall moose hunt.

Please consider my request on behalf of the subsistence hunters in unit 9B and I look forward to your response.

Thank you,  
Charles Warren Hill  
907-717-6266

<https://outlook.office365.com/mail/inbox/id/AAQkAGQ3MmY2N2YxLTQzMjgtNDQ1Yy04NWRhLWZlZlZWRkNmQ0OGRmMwAQAE7Hsba7s29PtVi%2Bj...> 1/1

## WP24-14

**PUBLIC SUBMISSION**

|                                                                                                                                                                                                                                      |
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| <b>As of:</b> April 13, 2023<br><b>Received:</b> April 04, 2023<br><b>Status:</b> Posted<br><b>Posted:</b> April 13, 2023<br><b>Tracking No.</b> lg2-jrsh-pbzn<br><b>Comments Due:</b> April 12, 2023<br><b>Submission Type:</b> Web |
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**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0010

Comment from Lake Clark National Park Subsistence Resource Commission

**Submitter Information****Email:** elizabeth\_rupp@nps.gov**Government Agency Type:** Local**Government Agency:** Lake Clark National Park Subsistence Resource Commission**General Comment**

The Lake Clark Subsistence Resource Commission is requesting that the federal open season dates for bull moose in GMU 9B be extended by five days to align with the state’s open season of September 1-25. Currently the Federal Subsistence season is from September 1 to September 20th.

Justifications for this change:

- Alignment of dates will lessen confusion for hunters who pursue game in areas where several state and federal borders are located in proximity.
- This will provide more opportunity for Subsistence hunters with little or no impact to the population of moose.
- The State of Alaska extended the moose hunt, in part, to allow for more opportunities after the closure of the caribou hunt in GMU 9B. Such justification also applies to hunters following Federal Subsistence Regulations.

**Attachments**

Subsistence Proposal for Moose GMU9B

LAKE CLARK NATIONAL PARK  
SUBSISTENCE RESOURCE COMMISSION  
General Delivery  
Port Alsworth, AK 99653

The Lake Clark Subsistence Resource Commission is requesting that the federal open season dates for bull moose in GMU 9B be extended by five days to align with the state’s open season of September 1-25. Currently the Federal Subsistence season is from September 1 to September 20<sup>th</sup>.

Justifications for this change:

- Alignment of dates will lessen confusion for hunters who pursue game in areas where several state and federal borders are located in proximity.
- This will provide more opportunity for Subsistence hunters with little or no impact to the population of moose.
- The State of Alaska extended the moose hunt, in part, to allow for more opportunities after the closure of the caribou hunt in GMU 9B. Such justification also applies to hunters following Federal Subsistence Regulations.

Glen Alsworth, Chair, Port Alsworth  
Lary Hill, Vice-Chair, Iliamna  
Warren Hill, Port Alsworth  
Steve Kahn, Port Alsworth  
George Alexie, Nondalton  
Karla Jensen, Pedro Bay  
Thomas Hedlund, Iliamna  
Lyle Wilder, Port Alsworth

[Type here]

WP24-15

**PUBLIC SUBMISSION**

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**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0008

Comment from Igiugig Village Tribal Council

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**Submitter Information**

**Email:** jonathan.salmon@igiugig.gov

**Government Agency Type:** Tribal

**Government Agency:** Igiugig Village Tribal Council

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**General Comment**

See attached file(s)

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**Attachments**

WP24-XX Igiugig Caribou\_2



## 2024–2026 Wildlife Proposals

### Bristol Bay

Proposal to the Federal Subsistence Board

#### **Regulation to Change**

Unit 9—Caribou

Unit 9C, remainder – 1 bull by Federal registration permit or State permit (FC0914). Season may be announced.

Federal public lands are closed to the taking of caribou except by residents of 9C and Egegik.

#### **How the New Regulation would Read**

Unit 9—Caribou

**Unit 9C, that portion within Katmai National Preserve, bounded by the northern boundary of Unit 9C to the south bank of the Alagnak River to its confluence of the Nonvianuk River, including the north bank of the Nonvianuk River and Nonvianuk Lake. One caribou by Federal registration permit. Season dates Aug. 1 – Sept 30; Nov. 1 – March 31**

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

Unit 9C, remainder – 1 caribou by Federal registration permit or State permit (FC0914). Season may be announced.

Federal public lands are closed to the taking of caribou except by residents of 9C and Egegik.

#### **Justification**

The proposal requests the Federal Subsistence Board add a caribou season for Federally qualified users in Igiugig. Local observations for over 30 years have indicated that a herd of caribou, currently assumed by regulators to be associated with the Mulchatna Caribou Herd (MCH), do not migrate out of the Kukaklek (Qukaqliq) Lake and surrounding hills within Katmai National Preserve. This caribou herd does not leave the Kukaklek area, indicating that they have separated themselves from the MCH. Residents of Igiugig have a long customary and traditional use of caribou in the Katmai Preserve, specifically the area around Kukaklek Lake. Residents have harvested caribou in this area for decades after a reindeer herding program operated in this area. Even though the villages of Igiugig and Kokhanok have harvested caribou for decades, this herd remained stable. Caribou hunting opportunities under State and Federal regulations have been closed since 2019. In that time, observations of the resident caribou herd indicate the population has grown by nearly 50 percent in the four years and could support harvest from the residents of Igiugig.

If the creation of the Federal hunt is successful and the herd continues to show signs of a stable to increasing population, the hunt could be expanded to Federally qualified residents of the Kokhanok.

## WP24-16

# PUBLIC SUBMISSION

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| <b>Comments Due:</b> April 12, 2023 |
| <b>Submission Type:</b> Web         |

**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0009

Comment from Bristol Bay Subsistence Regional Advisory Council

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## Submitter Information

**Email:** leigh\_honig@fws.gov

**Government Agency Type:** Regional

**Government Agency:** Bristol Bay Subsistence Regional Advisory Council

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## General Comment

See attached file(s)

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## Attachments

WP24-XX BB Council expand Section 804 caribou Unit 9E

## 2024–2026 Wildlife Proposals

### Bristol Bay

Proposal to the Federal Subsistence Board (March 8, 2023, Pippa Kenner)

Bristol Bay Subsistence Regional Advisory Council

OSM, Anchorage

#### **Regulation to Change**

Unit 9—Caribou

Unit 9E—remainder, 1 bull by Federal registration permit or State Permit.

Federal public lands are closed to the taking of caribou except by residents of Unit 9E, Nelson Lagoon, and Sand Point.

#### **How the New Regulation would Read**

Unit 9—Caribou

Unit 9E—remainder, 1 bull by Federal registration permit or State Permit.

Federal public lands are closed to the taking of caribou except by residents of **Units 9C**, 9E, Nelson Lagoon, and Sand Point.

#### **Justification**

The Bristol Bay Council requests the Federal Subsistence Board to add residents of King Salmon, Naknek, and South Naknek to those eligible to harvest caribou in Unit 9E. These residents have many generations of customary and traditional use of caribou in Unit 9E. Alternative caribou were available in Unit 9C in the Mulchatna caribou herd, but the population of caribou and accessibility to residents of King Salmon, Naknek, and South Naknek have declined.

## WP24-17

**PUBLIC SUBMISSION**

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| <b>As of:</b> April 13, 2023<br><b>Received:</b> April 08, 2023<br><b>Status:</b> Posted<br><b>Posted:</b> April 13, 2023<br><b>Tracking No.</b> lg8-keve-65pe<br><b>Comments Due:</b> April 12, 2023<br><b>Submission Type:</b> Web |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-0018

Comment from Grenda, Adam

**Submitter Information****Name:** Adam Grenda**Address:**

King Salmon, AK, 99613

**Email:** adamgrenda89@gmail.com**Phone:** 907-764-8091**General Comment**

I am writing this proposal to change the current regulation in Federal Wildlife Subsistence Regulations. This is specifically in reference to unit 9 where there is a current Tier 2 hunt for caribou (TC505) offered by the state. This is for the Northern Peninsula Caribou herd (NAP) which has a range over the northern end of the Alaskan Peninsula. Residents of King Salmon, Naknek and South Naknek have previously hunted this population of caribou when the herd was thriving in 1970s-1990's.

The federal regulations stipulates the following for Unit 9E caribou

"Federal public lands are closed to the taking of caribou except by residents of Unit 9E, Nelson Lagoon, and Sand Point."

The proposed verbiage I would like to see as a regulation change is as follows :

"Federal public lands are closed to the taking of caribou except by residents of Unit 9E, Nelson Lagoon, and Sand Point, King Salmon, Naknek and South Naknek."

This hunt is offered Aug 10 to Oct 10 and Nov 1- April 30 for 9E. A majority of the caribou spend summer and fall and winter on federal lands. As it stands currently residents of King Salmon, Naknek and

## 2024–2026 Wildlife Proposals

### Bristol Bay

South Naknek are only able to hunt unit 9 on state lands which keeps us very restricted in the lands we can pursue caribou.

Early in the season the caribou spend their time in higher elevations out of the bugs and where they have the advantage to be able to see long distances to watch for predators. Later as they start to migrate, they stay on unit 9 federal lands and will not enter state lands during the hunting season.

Later into winter, most caribou get taken via snow machine from the communities listed above. Caribou in 9C closes earlier on February 28th. Usually, March is one of the best months for us to hunt them on snow machine. This is because the days are longer and we usually have a lot of snowfall during that timeframe. However, 9C closes the end of February and we have to travel further south into 9E to get to an open hunt area. This is completely feasible except for the fact that we are unable to hunt 9E federal lands which really limits where we can take caribou in 9E.

Attached I have a 1983 research document from ADFG that clearly shows in the 1980's how vital the caribou population sustained the families of King Salmon, Naknek and South Naknek. (Caribou Use ADFG 1983)

As you can see in this chart the primarily ungulate utilized for food has always been the caribou. For a multitude of factors, moose has and still is not one of the main sources of meat that sustains these families.

For the past few seasons, the hunt has allowed 300 permits and there hasn't been enough harvest. Over the past 6 years of data the average take for 9C and 9E combined is 87 caribou per year. Recently this year of 2023 ADFG increased the Tier 2 permits from 300 to 600 to hopefully increase take in this population.

I also have attached a document from ADFG biologist showing in the last 6 years the NAP herd is growing consistently and the current population can sustain this change of regulation.

I feel that this simple yet effective rule change will give residents of these communities' access to the caribou they once pursued. They will be able to access the lands on the Alaska Peninsula that they used to hunt and be able to target the caribou that is a heavily relied on food source.

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## Attachments

Caribou Use ADFG 1983

Caribou Survey 2016-2021 ADFG

**Table 2. Unit 9C and 9E Northern Alaska Peninsula caribou harvest, regulatory years 2016–2021.**

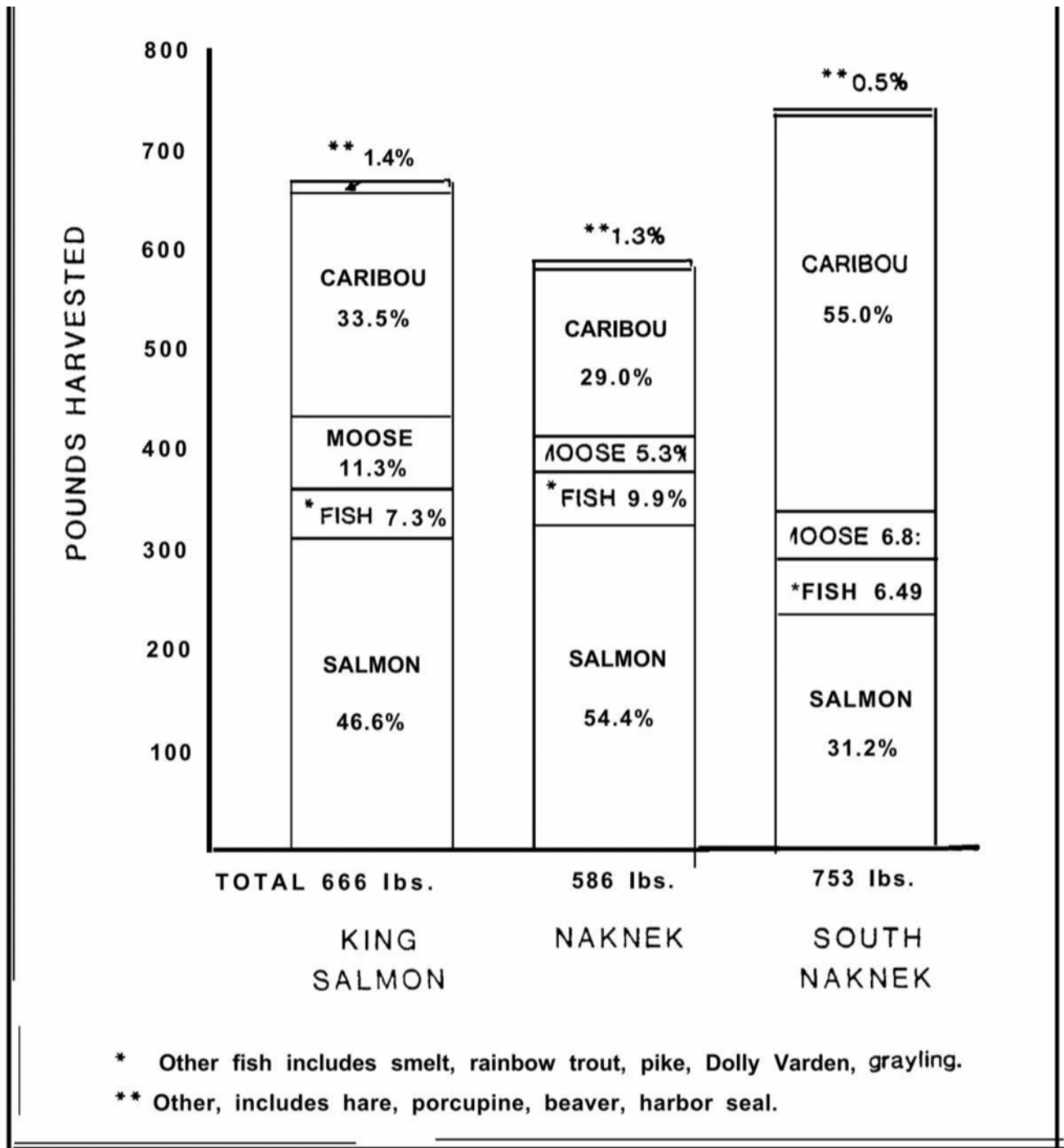
| Regulatory year | Reported harvest |    |     | Unk | Total reported | Estimated Other <sup>a</sup> | Estimated total |
|-----------------|------------------|----|-----|-----|----------------|------------------------------|-----------------|
|                 | M                | F  | (%) |     |                |                              |                 |
| 2016            | 74               | 8  | 90% | 0   | 82             | 20                           | 102             |
| 2017            | 42               | 16 | 72% | 0   | 58             | 20                           | 78              |
| 2018            | 67               | 11 | 86% | 0   | 78             | 20                           | 98              |
| 2019            | 75               | 5  | 93% | 1   | 81             | 20                           | 101             |
| 2020            | 44               | 13 | 77% | 0   | 57             | 20                           | 77              |
| 2021            | 48               | 1  | 96% | 1   | 50             | 20                           | 70              |

<sup>a</sup>Other sources of human-caused mortality include wounding loss, unreported harvest, and illegal harvest. Source: Data pulled from the division’s WinfoNet data system on 22 March 2023.

**Table 1. Northern Alaska Peninsula caribou herd composition, population counts, and predicted population size, 2017–2021.**

| Regulatory year | Bulls:   |          | Calves:  |          | % Bulls | Sample size | Model-predicted population size |
|-----------------|----------|----------|----------|----------|---------|-------------|---------------------------------|
|                 | 100 cows | 100 cows | 100 cows | 100 cows |         |             |                                 |
| 2017            | –        | –        | –        | –        | –       | –           | 3,181                           |
| 2018            | 72       | 35       | 17       | 48       | 35      | 1,118       | 3,463                           |
| 2019            | 53       | 34       | 18       | 54       | 28      | 1,203       | 3,595                           |
| 2020            | 55       | 33       | 18       | 53       | 29      | 1,971       | 3,642                           |
| 2021            | 61       | 42       | 21       | 49       | 30      | 2,494       | 3,852                           |

En dashes indicate no data.



**Fig. 6. Mean Household Harvest of Fish and Wildlife Resources: King Salmon, Naknek, and South Naknek, 1983.**

## WP24-18

**PUBLIC SUBMISSION**

|                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Docket:** FWS-R7-SM-2022-0105

Subsistence Management Regulations for Public Lands in Alaska—2024–25 and 2025–26 Subsistence Taking of Wildlife Regulations

**Comment On:** FWS-R7-SM-2022-0105-0001

Subsistence Management Regulations for Public Lands: Alaska; Taking of Wildlife

**Document:** FWS-R7-SM-2022-0105-DRAFT-0027

Comment from FWS

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**Submitter Information****Email:** andy\_aderman@fws.gov**Government Agency Type:** Federal**Government Agency:** FWS

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**General Comment**

We propose to expand the open area for hunting caribou in the FC1702 hunt. The current description for the FC1702 hunt area is: Units 17A and 17C, that portion of 17A and 17C consisting of the Nushagak Peninsula south of the Igushik River, Tuklung River and Tuklung Hills, west to Tvativak Bay. The proposed expansion of the hunt area would include the area northwest of the existing hunt. Over the past three winters, most of the Nushagak Peninsula Caribou Herd has wintered in the area immediately north and west of Tvativak Bay, which is closed under the current regulations. This has resulted in lower harvest rates due to the caribou staying in the closed area from late December to late March. Harvest objectives were not met in the past three seasons.