



SOUTHEAST ALASKA SUBSISTENCE  
REGIONAL ADVISORY COUNCIL  
Meeting Materials

*October 5-7, 2021  
via teleconference*





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*On the cover...*

Brown bear - Kootznoowoo Wilderness, Admiralty Island, Tongass National Forest



Forest Service photo by Don MacDougall

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**SOUTHEAST ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL**

Via Teleconference/Videoconference  
 October 5 – 7, 2021

**AUDIO BY TELECONFERENCE ONLY:** call the toll free number: **1-866-617-1530**, then when prompted enter the passcode: **93629472**.

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

**PLEASE NOTE:** These are estimated times and the agenda is subject to change. Contact staff for the current schedule. Evening sessions are at the call of the chair.

**AGENDA**

\*Asterisk identifies action item.

<b>1. Invocation</b>	
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Regional Closure Review

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f. Fall 2021 Council application/nomination open season (*Council Coordinator or Council Coordination Division Supervisor*)

**12. Agency Reports**

(Time limit of 15 minutes unless approved in advance)

Tribal Governments

Native Organizations

U.S. Forest Service

- a. Special Actions (*USFS*)
- b. USFS Projects Updates (*USFS*)
- c. Tribal Relations Report (*Melinda Hernandez-Burke*)

Alaska Department of Fish and Game

- a. Subsistence Research (*Lauren Sill*)
- b. Kelp Faiming (*Flip Pryor*)

Office of Subsistence Management (*Leadership Team Lead*)

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**15. Closing Comments**

**16. Adjourn (*Chair*)**

**Please note that the audio portion of this meeting will be by teleconference only.** To call into the meeting, dial the toll free number: **1-866-617-1530**, then when prompted enter the passcode: **93629472**.

Speakers and presentations can be seen through Microsoft Teams videoconference platform. Call **(907) 786-3888** or **Toll Free: (800) 478-1456** for the link to Microsoft Teams videoconference. **Audio will only be provided via the above-referenced teleconference information.**

*Reasonable Accommodations*

The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct all requests for special accommodation needs to DeAnna Perry, 907-209-7817, [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov), or 800-877-8339 (TTY), by close of business on September 20, 2021.

## REGION 1

### Southeast Alaska Subsistence Regional Advisory Council

	2021 2022	<b>Ian A. Johnson</b> <i>Hoonah</i>
	2004 2022	<b>Frank G. Wright Jr.</b> <i>Hoonah</i> <span style="float: right;"><b>Secretary</b></span>
	2021 2022	<b>Calvin H. Casipit</b> <i>Gustavus</i>
	2000 2022	<b>Michael A. Douville</b> <i>Craig</i>
	2021 2022	<b>James C. Slater</b> <i>Pelican</i>
	2021 2023	<b>Robert F. Schroeder</b> <i>Juneau</i>
	2021 2023	<b>Albert H. Howard</b> <i>Angoon</i>
	2021 2023	<b>Donald C. Hernandez</b> <i>Point Baker</i> <span style="float: right;"><b>Chair</b></span>
	2021	<b>VACANT</b>
	2018 2021	<b>Harold Robbins</b> <i>Yakutat</i>
	2021 2023	<b>Harvey Kitka</b> <i>Sitka</i>
	2018 2021	<b>Larry Bemis, Jr.</b> <i>Yakutat</i>
	2009 2021	<b>Cathy A. Needham</b> <i>Juneau</i> <span style="float: right;"><b>Vice-Chair</b></span>



## SOUTHEAST SUBSISTENCE REGIONAL ADVISORY COUNCIL

### Meeting Minutes

Via tele-video conference

March 16-18, 2021

*These minutes are an abbreviated record of the business conducted at this meeting.*

*For full details, transcripts of this three day meeting are available at:*

*<https://www.doi.gov/subsistence/library/transcripts/1-southeast-alaska>*

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

The meeting was called to order Tuesday, March 16, 2021, at approximately 9:00 a.m. Council members Frank Wright, Jr., Calvin Casipit, Michael Douville, Jim Slater, Albert Howard, Donald Hernandez, Harold Robbins, Harvey Kitka, Larry Bemis, Jr., Ian Johnson, Robert Schroeder, and Cathy Needham were present for all or most of the meeting. The Council currently has one vacant seat. A quorum was established with twelve seated Council members participating by phone/video.

#### Attendees:

##### *By Teleconference or Videoconference*

- U.S. Forest Service (USFS), Juneau: *Dave Schmid, Wayne Owen, DeAnna Perry, Greg Risdahl, Scott Shuler, Terry Suminski, Rob Cross, Jacob Musslewhite, Susan Oehlers, Gregory Dunn, Melinda Hernandez-Burke*
- Office of Subsistence Management (OSM), Anchorage: *Brent Vickers, Pippa Kenner, George Pappas, Orville Lind, Kevin Foley*
- Organized Village of Kasaan (OVK): *Marina Anderson*
- Ketchikan Indian Community (KIC): *Keenan Sanderson*
- Metlakatla Indian Community: *Mayor Atkinson, Judith Eaton*
- Sitka Tribe: *Jeff Feldpach*
- Sitka Kaagwaantaan: *Harvey Kitka*
- Tanana Chiefs Conference – Hunting, Fishing, and Gathering Task Force: *Ben Stevens*
- Bureau of Indian Affairs (BIA), Anchorage: *Pat Petrivelli*
- Bureau of Land Management (BLM): *Valerie Lenhartzen*
- National Park Service (NPS), Anchorage: *Joshua Ream, Victoria Florey, Adam Dermish*
- Wrangell-St. Elias National Park and Preserve (NPP), NPS: *Barbara Cellarius*
- Denali National Park and Preserve, (NPP), NPS, Anchorage: *Amy Craver*
- Alaska Department of Fish and Game (ADF&G), Anchorage: *Ben Mulligan, Mark Burch, Lauren Sill, Robert Chadwick, Robin Dublin,*

- Members of the Public: ***Katie Riley and Heather Bauscher – Sitka Conservation Society; Sally Schlichting – Southeast Alaska Conservation Council; Larry Edwards – Alaska Rainforest Defenders, Kathy Hansen***

## **Welcome and Introductions**

Dave Schmid, USDA-USFS Alaska Regional Supervisor and FSB member, addressed the Council and thanked them for serving on this Regional Advisory Council for subsistence issues. He informed the Council of: the four major priorities of the new administration, the invitation extended by the new USDA Secretary for tribes to consult, and the status of all environmental decisions and actions that occurred right before transition – they are being reviewed under the Congressional Review Act. Mr. Schmid then answered questions from the Council on a variety of Forest Service land management issues.

## **Review and Adopt Agenda**

Motion by Mr. Wright, seconded by Ms. Needham, to adopt the agenda with the following additions: “11e. Fisheries Resource Monitoring Project” and “12 USDA – Tribal Relations Report.”  
The motion passed unanimously.

## **Election of Officers**

Mr. Don Hernandez was re-elected the Council’s Chair.  
Ms. Cathy Needham was re-elected the Council’s Vice Chair.  
Mr. Frank Wright, Jr. was re-elected the Council’s Secretary.

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

Motion by Mr. Kitka, seconded by Mr. Casipit, to approve the fall 2020 meeting minutes with suggested additions to Mr. Bemis’s Council member report. The motion passed with 8 votes. New members abstained from voting.

## **Council Member and Chair Reports**

*Ian Johnson of Hoonah* reported that record setting rain amounts and the high event type of winter in the area triggered eight landslides affecting: the whole road network which impacted the ability to participate in subsistence activities and on rivers; the outlay of water systems through the scouring that occurs and pools in new areas along with the washing out of salmon eggs; future Pink Salmon populations; the impact of the amount of sediment left in the estuaries; and levels far out in the flood plain churning up clams and cockles. It was a pretty tough deer hunting season; however, hunters were able to harvest a lot of deer on the beach due to an early snow. Hoonah has detected the highest levels of paralytic shellfish poisoning in shellfish and this is believed to be from warmer temperatures and nutrient outflow from rivers. People were successful in fishing if the openings coincided when the fish were in the area. It was an average year for berries, with blueberries doing better than salmonberries. There are stream restoration and landscape improvements of private and public lands through the Hoonah Native Force Partnership, along with other work directly linked to community need, subsistence, and resource production.

*Frank Wright, Jr. of Hoonah* reported environmental change observations such as caterpillars in January, the absence of swallows, and the unusual depths at which Dungeness and Tanner Crabs were found. The challenge of ferry service (non-existent or unpredictable) is hard on smaller communities. For commercial fishermen, the price of Black Cod is up but not halibut prices, so fishermen expect a struggle in the future. The ferry system seems to be geared more for tourists than for local transportation and this issue should be addressed. The city is doing well on virus testing for the community; however, the mental health of young people are suffering because of COVID conditions (exacerbated by absence of sports and peer socializing). The area has suffered landslides due to weather conditions and high river level likely washed out the salmon eggs.

*Calvin Casipit of Gustavus* reported that he dealt with the COVID issue as Mayor of his community and only one local resident contracted the virus. The vaccine program was successful in keeping the virus away. There was a good moose season (which happens on private/state lands) with only one or two illegal bulls shot last season. Rates of harvest for deer season were successful as well, probably due to pre-rut snow. He made one disappointing unsuccessful fishing trip to Neva Creek this year. It was concerning to see two four-person self-guided fly rod fishing groups that went sportfishing up at Neva who stated each of them 'limited out,' especially since this fishery was supposed to be closed to non-Federally qualified users. Coho fishing was good and may have been the result of the reduced effort from the sport charter fleet (due to the pandemic). The City of Gustavus applied for and fished a community harvest permit for halibut and many residents received the halibut they needed.

*Michael Douville of Craig* reported that it is believed that old growth logging and stem exclusion are reducing the quality of deer browse and habitat, causing a downturn in the deer population. Deer hunting success rates continue to drop. Wolf issues continue on Prince of Wales Island. The population seems healthy but there is a pending petition for listing the Archipelago wolf under the Endangered Species Act. It is believed that good science will prevail and the species will not be listed. Climate change observations: this was the worst winter in memory for wind and rain; the timing of rainfall resulted in flood waters that washed away salmon eggs.

*Jim Slater of Pelican* reported that the community of Pelican is transitioning to a fish processing and tourism town. There are two fish buying operations and one fish processor in town, employing over 30 people in the summer between them and it is estimated that 500,000 fish will go through Pelican this year. Several charter businesses operate in Pelican and they are expected to start paying sales tax on their fleets in 2022, which will help generate revenue. One cruise line will bring two to four ships a week to the area and the city council is considering the town's position on town/cruise ship interaction. Ferry service was suspended for almost a year which created food security hardships, especially during the pandemic, but service has now been restored. For the last year, the city has been powered by diesel; however, hydropower is expected to be back online soon. There is increased hunting pressure for deer and along with weather and brown bear predation: many did not get their harvest needs met. Fishing overall has been consistent but fishing in Lisianski Inlet has significantly worsened over the last decade or two for both salmon and halibut. Four and five attempts are required to catch halibut and the increased effort does

not result in meeting subsistence needs. Clam populations were good and shrimping was okay but berries and mushrooms were below average.

*Robert Schroeder of Juneau* reported that the absence of a tourist season had significant economic effects on his community. There was a good King salmon season but run numbers were down on Coho salmon. Although deer were around, harvesting was more difficult this year. He encourages the Council to “think big” and consider the huge social changes that are possible because of the new political administration and how this may allow the Council to provide more subsistence protection in the coming year. This Council has spent a significant amount of time on forest management and subsistence related issues in past years. Perhaps this Council would like to talk about forest policy and form a forest policy group to write up the way we see forest issues on the Tongass National Forest. He has been impressed by the Council’s ability to function remotely under the limitations created by the pandemic and also the Council’s success in conducting business with so many vacant Council member seats over the last few years.

*Albert Howard of Angoon* reported a lot of snow and rain this winter in his area. Deer season was not typical but deer were definitely around. Perhaps it is because bear hunters are allowed to shoot deer in the fall. Crabs can be enjoyed up to the opening of the commercial season and then there are mostly only females available. There is no mechanism to close the area if there is a conservation concern. This issue is routinely reported each year but nothing is done to address it. This is an example of unintended consequences from decisions made by non-subsistence users which affect local subsistence users. Bear hunting clients in the area have been caught checking area crab pots – maybe because commercially licensed fishermen cannot legally feed their clients sport-caught fish or crabs so the clients are helping themselves. He suggested working with the State to ‘manage for abundance’ because every part of the resource is diminishing, (low salmon numbers and the closure of Hoonah Sound shrimp harvest). Co-management may be the answer for success, especially with the State’s diminishing funds for management. It would be easier to call local subsistence users for observation and anecdotal information.

*Donald Hernandez of Point Baker* reported that despite seeing a lot of deer in general this year, there were few bucks and local hunters experienced a poor deer harvesting season. Erratic weather has pervaded Southeast recently, and the torrential rains have triggered horrific landslide. There are concerns about the impact that these slides may have had on salmon spawning beds. There is an additional concern that the severe cold and no snow pack may have frozen the salmon eggs in the streams. He continues to work in assisting the planning of a Deer Summit to address deer issues on Prince of Wales Island and this meeting will probably take place next winter. There has been good support from local tribes, the local USFS District Ranger, and ADF&G staff for this Summit.

*Harold Robbins of Yakutat* reported that his community is experiencing a ‘real winter’ with three to five feet of snow currently on the ground. The snow may be a real concern for moose/deer survival once it sets up and wolf predation is easier. During the moose hunt in Unit 5A East of Dangerous River, only 34% of moose were taken by local subsistence users; there were 21 moose taken by non-locals. Perhaps some consideration should be given to the subsistence moose harvest timing east of the Dangerous River

because many subsistence users are still trying to commercial fish at the same time. There has been good trolling in the bay that has helped the town economically. Plentiful eulachon have been seen and they are attracting predators (sea lions, gulls) all along the coast up to about the Dangerous River. A local State biologist reported that DNA samples are back from the commercial spring gillnet opening on King Salmon in Yakutat Bay (from May, 2019), and that there was a reasonable number of Situk and Alsek King Salmon along with Southeast Kings in that fishery. This might be an issue for spring troll opening.

*Harvey Kitka of Sitka* reported that there are issues with declining Sockeye Salmon and there are not enough for subsistence harvesting. There are concerns with shrimping and the impact on this resource by charter boaters and commercial users. There is hope that management has a handle on this as subsistence users are getting some shrimp. There are ongoing concerns with the herring fishery because although there seem to be more herring this year, they are small, there are less spawners, and the quality of eggs is lower. Through litigation, the State of Alaska is looking at subsistence differently and there is a new requirement in management that it will now have to check with subsistence people on the quality of eggs. Local deer population seems to be fine and the mild climate seems to have helped considerably.

*Larry Bemis, Jr. of Yakutat* reported that there were people in place at the local cannery before the COVID lockdown and they were able to proceed with processing halibut and salmon. Halibut season was extended and the limit in Unit 3A was increased by 27% so many harvesters are out waiting on the weather. Weather this winter has affected trolling success. The low-end escapement goal on King salmon was met on the Situk and Alsek rivers. Over escapement for several years may have impacted the population. The local economy depends upon tourism and commercial fishing and there was some sportfishing after COVID-19 restrictions were relaxed. The area has experienced winter storms back-to-back with rain/freezing rain/ snow producing a lot of swings in temperatures. There is a fish tagging program for King Salmon currently going on in different sectors of Yakutat Bay, tracking fish to the Pacific Ocean or Gulf of Alaska, and gathering information about water temperatures and the depths of where the fish are swimming.

*Cathy Needham of Juneau* reported on her activities on Prince of Wales Island. She has spent time working on wolf issues and working with Hydaburg Cooperative Association on wildlife population issues in conjunction with the State of Alaska. She recognizes that there isn't always support for survey/monitoring protocols in estimating the number of wolves on the island, but it is the current mechanism in place to manage populations and this management strategy that ADF&G has implemented was supported by the Council. The research does not have funding to continue and she expressed the importance of Council support for the funding of wildlife projects to be able to gather the information needed for management decisions. She is following numerous endeavors for local resource management, including indigenous management efforts coming out of the region, and she hopes to continue to learn and support actions that are taken for the benefit of subsistence users in the region.

*Chair's Report* – Federal Subsistence Board (Board) Meeting: Ms. Needham provided support as Acting Chair for the past three months and she represented this Council at the Board meeting in January. There was one Southeast fishery proposal on the Board's consensus agenda (to maintain status quo on the

closure of Makhnati herring and herring spawn). Ms. Needham informed the Board of the Council's opposition to the delegated authority component of the newly proposed NPS Individual Customary and Traditional Use Determination process and the Board passed a modified version of the process. All Regional Advisory Councils voiced dissatisfaction on the numerous seats vacant on Councils statewide. She relayed details of some of the work done by this Council over the last year to the Board, including communications on Forest Service land management activities, and specifically, the many efforts this Council has made to address issues of importance to subsistence users during the Alaska Roadless Rulemaking process.

*General Public Testimony:*

*Mike Miller*, Sitka Tribal Council, provided some updates on: the building of a co-management body with wide regional representation on marine mammal work and potential reauthorization language for the Magnuson-Stevens Act (which would add subsistence definitions and protections for forage fish). He provided copy of a resolution in support of this that came from Alaska Federation of Natives. They are facilitating getting a group back together, funded by National Marine Fisheries Service, which would provide a venue for all communities to speak to their issues.

*Harvey Kitka*, *Sitka Kaagwaantaan*, advised the Council that the clan submitted a letter to the Secretary of Agriculture in August 2020, requesting extraterritorial jurisdiction (ETJ) of Sitka waters for herring. The marketable fish are older fish and targeting them for harvest has dropped the percentages of older herring considerably. Based on biomass, the future of this fishery does not look good. Wayne Owen, Regional Director – USFS, provided a status update on the petition with the agency: USFS Washington office is putting together packages of unresolved issues for the new Secretary of Agriculture's review (which includes the ETJ). Mr. Kitka was encouraged to resubmit the petition to the new Secretary of Agriculture.

*Patty Phillips of Pelican*<sup>1</sup>, a long-time advocate for the continuance of traditional ways of harvest and the sharing of traditional ecological knowledge, informed the Council of observations in her community: flooding has washed out salmon eggs and salmon numbers are low in Lisianski Inlet/Lisianski Strait. Bears are not meeting their nutritional needs due to less salmon available and they may be preying on deer. There are more bear/human interactions. Deer may be staying up in the alpine. Less deer are observed and subsistence needs for harvest are not being met. There is a concern that there is overharvest from non-Federally-qualified users. The Department of Agriculture's Farmers to Family food box program brought in 10,000 pounds of food that was distributed within the community. These boxes, along with harvesting resources locally, contributed to meeting some of the food needs. Southeast Alaska is living with consequences of decisions made over the last 50 years (ANILCA) and we are just getting to the point of actually advocating for our Federally-qualified subsistence users. She would encourage the Council to look at things holistically and to remember that the decisions made have consequences on our rural communities.

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<sup>1</sup> Ms. Phillips served on the Council for over 26 years and the Council mentioned her years of support and thanked her for her service as a council member and for continuing to stay engaged with the Council's business.

*Marina Anderson, Organized Village of Kasaan*, informed the Council of a petition submitted by 12 Southeast tribes to the Department of Agriculture, requesting a creation of a traditional homelands conservation rule. This petition is relevant to this Council as it asks for long-term management and protection of traditional and customary use areas. Specifically, it asks for: 1) an inventory and identification and protection of traditional and customary use sites; 2) a new consultation process to co-identify the areas and to co-create the conservation measures; and 3) increase the use of existing authorities and cooperative agreements. The signatories requested a letter of support from the Council on this issue. The Council was provided with a copy of the Traditional Homelands Conservation Rule petition.

*Katie Riley, Sitka Conservation Society*. Supported the development of the Traditional Homelands Conservation Rule petition and she informed the Council that this petition was provided to prior Secretary of Agriculture, Sonny Perdue. Receipt of the petition was acknowledged but there has been no further response. She appreciates the Regional Forester's assurance that the new Secretary of Agriculture has the petition. Sitka Conservation Society is working through the Sustainable Southeast Partnership to bring co-management work to fruition.

*Lee Wallace, President Organized Village of Saxman*, commented on the limited opening on the Unuk River Eulachon fishery for Federally-qualified users. Subsistence users of Metlakatla and Saxman are looking at working together for resource management and they have submitted a request for a community fishery (versus an open fishery) to the District Ranger. In tracking State of Alaska applications for fisheries, commercial, sportfish – charter sector, seafood processors and Alaska Aquaculture were listed, but for subsistence harvesters there were 'no applications at this time.' Federally recognized tribes were slated to receive \$1 million, which would have probably gone to Federally-recognized tribes in Alaska and assisted their harvesters; however, it remains unspent because there are 'no applications available for subsistence harvesters' within the State of Alaska.

*Tazia Wagner, Metlakatla Indian Community*, provided history on her family's use of the Unuk River for Eulachon harvest and she commented that many elders have not been able to eat Eulachon for a long time. She agreed with President Wallace's comments on the need to limit the number of boats going up to harvest on the Unuk River in order to mitigate any disturbance to the ecosystem or the run. She suggested the use of beach netting for a harvest method as this is the best way to harvest in the dangerous Unuk River.

*Melinda Hernandez-Burke, USFS Tribal Relations Specialist* commented on the positive collaboration and communication between tribes in the Ketchikan area and District Ranger Walker, noting this type of relationship building is a great model that can be built upon. She provided the Council with several articles of work and collaboration being done by Southeast tribes.

*Heather Bauscher, Sitka Conservation Society*, informed the Council that the Policies and Procedures Practicum class through University of Alaska (subject: Federal Subsistence Program) was currently on

pause due to COVID-19. She was pleased to announce that through the partnership funds provided by USDA-Forest Service, the class has funding for three years, and she hoped that in-person attendance to Council meetings could resume in the fall. She has been active with actions related to Roadless and climate and will share material with the Council.

*President Kevin Frank, Angoon Community Association*, reported on issues of food security in Angoon and the concerns over the safety of consuming deer and seal from the area (due to possible contamination). The practice of subsistence activities that he enjoyed as a child are now against the law. He hopes that others will note what is going on and recognize the subsistence culture. He mentioned it was hard for him to see the challenges the community endures, including having to release any King Salmon caught and the hardship of paying fines. He would like to see people support the Angoon Community Association as a government and recognize the need for it to survive.

*Zack Decker, Glacier Guides*, introduced himself and talked about his guiding business which operates in the northern part of Southeast. It provides opportunities to hunt brown bear, black bear, deer, and mountain goat and provides summer adventure tours in Glacier Bay. He is a second-generation guide operator and he called into the Council meeting to see how his company could better assist subsistence efforts by learning about the concerns and becoming aware of issues of interest to the Southeast subsistence community.

## **Old Business**

### ***Deer Harvest Status***

Tom Schumacher, ADF&G, provided information on deer harvest in Southeast. The 2019 deer harvest was approximately 6,000 with approximately 75% of the harvest being bucks. No major changes expected for 2020 deer populations, but data is not yet available (they are currently in the process of taking hunter reports for the 2020 harvest).

### ***Unit 2 Wolf Status***

Mr. Schumacher and Scot Shuler, Craig District Ranger, provided information on the management of Unit 2 (Prince of Wales Island) wolves. Unit 2 wolf harvest and status population is probably within or above the population objective (between 150 – 200 wolves) and, being sustainably managed, the population should be well-positioned for the coming year. The Council expressed concerns for the management decisions regarding Unit 2 wolves: 1) traditional ecological knowledge is not considered; 2) hair boards are not the best method to gather DNA data for population estimates; and 3) wolves are unpredictable so getting mark/recapture information is not necessarily possible.

### ***Unit 2 wolf sealing period proposal – Proposal #194***

Mr. Schumacher advised the Council of a pending out-of-cycle (agenda change request) State Board of Game (BOG) proposal that would reduce the time to seal a wolf to seven days after harvest. The Council discussed the impact that this may have on subsistence users, the limited value gained by this unnecessary burden on subsistence users, especially with such a short season predicted, and the necessity for a Federal companion proposal to make the State's proposal effective.



BOARD OF GAME COMMENT: Motion by Mr. Douville, seconded by Mr. Kitka, to send a letter with comments in opposition to BOG Proposal 194. The motion passed unanimously.

*“The Council opposed Proposal 194, especially if implemented in a shortened wolf season. The Council anticipates shorter seasons in the immediate future and feels that this proposal, designed to improve the population estimate for Unit 2 wolves, would provide limited value for the population model and that the benefit would not outweigh the burden placed on subsistence users. The Council would support a sealing requirement of seven days after the end of the season. Additionally, there are not enough sealers in Unit 2 and this would result in a hardship on trappers to find a sealer. For those trappers working out of a boat, access and safety may be an issue in bad weather. This could affect a trapper’s ability to harvest while meeting a weekly sealing requirement. For this regulation to be effective, a companion Federal proposal should be submitted to the Federal Subsistence Board and the Council would suggest that the Alaska Department of Fish and Game consider an alternative that does not require a regulation change: encourage trappers to seal sooner on a voluntary basis.”*

*Alexander Archipelago Wolf ESA Listing:*

Mr. Schumacher reported that there is a pending petition to list the wolves in Southeast as a distinct population under the Endangered Species Act and all indications are that this petition will be accepted by the Fish and Wildlife Service. This will trigger another 12-month finding (same as the 2015 listing process) where information is reviewed. ADF&G strongly disagrees with the petition.

### ***State Board of Fisheries Proposals***

The Council continued its discussion of Alaska Board of Fisheries (BOF) proposals identified during its fall 2020 meeting. The Council reviewed its discussion of some of the proposals discussed in the fall and then voted to provide a written public comment letter from the Council to include additional BOF Proposals 125 - support, 177 - support, 210 - support, 127 - support, 130 – oppose, 131 - support. In the interest of time, the Council decided to defer action on the other proposals of concern to its fall 2021 meeting. The Council intends to take one last review of its discussions on the identified BOF proposals over the last year and approve a final version of the BOF comment letter at its fall 2021 meeting.

### ***National Park Service Individual Customary and Traditional Use Determinations***

Joshua Ream informed the Council of the decisions made by the Board regarding the process used for customary and traditional (C&T) use determinations for individuals: the Board retains final decision making authority on these determinations, the process now includes a formal recommendation from both the affected Regional Advisory Councils and from the affected Subsistence Resource Commission, and the application window is open continuously (instead of being tied to the biennial regulatory proposals cycle). No action was required by the Council but the opportunity for comments and questions was given.

## **New Business**

The Council received a Federal Subsistence Fisheries and Wildlife report for the Southeast Region and biologist Rob Cross, USFS, presented the wildlife status information in detail.

### ***Call for Federal Wildlife Proposals***

Pippa Kenner, Office of Subsistence Management (OSM), and Terry Suminski, USFS, provided the Council with information on the open Call for Wildlife proposals. The Council discussed various wildlife observations in their communities and heard public testimony on wildlife harvest issues.

### ***Public Testimony for Wildlife Proposals***

Pelican – Deer Issue: Several rural residents from Pelican provided testimony that due to people coming into Pelican (hunting/fishing lodge guests) and utilizing the resources, there is increased competition for hunting and fishing. There are safety risks as non-residents do not know the land. The added pressure has impacted local subsistence users by affecting the resource availability and they are unable to meet their harvest needs: Celeste Weller, Mike Allard, Mayor Walt Weller, Terry Wirta, George Phillips, Avery Simmons, Edwina Simmons.

Residents of Southeast (particularly Juneau) have ties to Pelican and may own land in Pelican and utilize the resource for their subsistence needs: Patty Phillips.

*(for complete testimony, please review transcript for March 17, 2021)*

### ***PELICAN – ANGOON – HOONAH PROPOSALS:***

The Council discussed the importance of food security for the low-income subsistence community of Pelican and crafted a deer proposal to address the issue. The Council then discussed similar issues in the communities of Angoon and Hoonah and drafted similar proposals for those areas. The Council recognized the challenge of trying to provide a meaningful priority for local Federally qualified subsistence users for those Federal public lands without negatively affecting other users, such as nearby non-local family members or others who have a long term tradition of coming to these areas to hunt and fish.

The Council then voted to submit the following proposals to change Federal wildlife regulations:

- 1) Deer – Unit 4, Angoon: Motion by Mr. Howard, seconded by Mr. Johnson, to submit this proposal closing certain Federal public lands on Admiralty Island to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users. The motion passed on a unanimous vote.
- 2) Deer – Unit 4, Hoonah: Amended Motion by Mr. Wright, seconded by Mr. Howard to submit this proposal closing certain Federal public lands in the Northeast Chichagof Controlled Use Area to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users. The motion passed on a unanimous vote.
- 3) Deer – Unit 4, Pelican (Lisianski Inlet): Motion by Mr. Hernandez, seconded by Mr. Wright to submit this proposal closing certain Federal public lands in (Lisianski Inlet-Strait, Stag Bay)

Pelican to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users. The motion passed on a unanimous vote.

*(these three deer proposals for Unit 4 were submitted due to increased hunting pressure from non-subsistence hunters, creating a concern for future prospects for local subsistence hunters; and, to prevent further depletion of the resource)*

- 4) Elk – Unit 3, draw hunt: Motion by Mr. Douville, seconded by Mr. Kitka, to submit this proposal to provide a meaningful subsistence priority for the harvest of elk and to reduce competition with non-Federally qualified users. The motion passed on a unanimous vote.
- 5) Elk – Unit 3, general: Amended motion by Mr. Casipit, seconded by Ms. Needham, to submit this proposal to provide a meaningful subsistence priority for the harvest of elk while aiding in the control of non-native elk outside of the managed populations on Etolin and Zarembo islands.
- 6) Goat – Unit 5A: Motion by Mr. Kitka, seconded by Ms. Needham, to submit this proposal to provide a longer season for subsistence users and to simplify the regulations. The motion passed on a unanimous vote.
- 7) Moose – Unit 3: Second amended motion by Mr. Douville, seconded by Mr. Casipit, to provide additional and easier opportunities for Federally qualified residents of Unites 1 – 5 to harvest moose on Kupreanof and Kiui Islands

### ***Council Charter Review***

The Council reviewed and discussed its Charter, which is renewed every two years. They considered the lack of full appointments in recent years and the resulting lack of geographic diversity on the Council and expressed the need to take incorporate ‘carryover’ language in the Charter to allow members to continue to serve until new appointments are made. Motion by Ms. Needham, seconded by Mr. Howard, to add the following language to the Council’s charter: “SERVICE OF MEMBERS – any member of any advisory council may serve after the expiration of the member’s term until a successor is appointed to the Southeast Alaska Subsistence Regional Advisory Council.” The motion passed on a unanimous vote.

### ***Review and Approve FY2020 Annual Report***

The Council reviewed the drafted Annual Report and approved the following topics for inclusion into the final FY2020 Annual Report:

- Information Sharing:
  - Public participation provided for in ANILCA
  - Restrictions on Federally-qualified Subsistence Users
  - Lack of current data for analyses
  - Individual National Park Service Customary and Traditional Use Process
- Support for the Community of Hoonah’s ability to access Glacier Bay
- Concern over Council vacancies experienced in recent years
- Need for staff support for Regional Advisory Council Meetings
- Reasonable access to resources in emergencies
- Status report of fish and wildlife resources in Southeast Alaska

Motion by Mr. Casipit, seconded by Mr. Johnson, to approve and finalize the annual report as discussed (with updated verbiage for Council vacancies topic and attachment of resources report). The motion passed on a unanimous vote.

### ***Fisheries Resources Monitoring Program Information Update***

Brent Vickers, OSM, provided an update on the Fisheries Resource Monitoring Program and reminded everyone that the funding opportunity closed on March 15, 2021. Applications will be reviewed, and the results will be presented to the Council at its next meeting. No action by the Council was necessary.

### ***Correspondence***

#### **Letter of Support for Kaagwaantaan's Petition for Extra Territorial Jurisdiction for herring:**

The Council has received several reports and testimony regarding the concern for herring stocks in Sitka Sound. The Council recognizes that the local residents have pursued all avenues to request a conservative management of the herring fishery from the State of Alaska. Motion by Ms. Needham, seconded by Mr. Howard, to write a letter supporting Sitka Kaagwaantaan's petition for extra-territorial jurisdiction. The Council supports this petition to bring the issue of conserving Sitka Sound herring up for Federal resource management consideration as all legal and administrative remedies have been exhausted. The motion passed on a unanimous vote.

#### **Letter of Support for the Petition to Create a Traditional Homelands Conservation rule:**

The Council was provided with this petition which was signed by 12 Federally recognized tribes in Southeast Alaska and the Council felt this document contained detailed and well thought out requests. Motion by Ms. Needham, seconded by Mr. Howard, to submit a letter of support for the Traditional Homelands Conservation rule petition. The Council supports action for the long-term management and protection of traditional and customary use areas in the Tongass National Forest by giving Tribes a leadership role. The motion passed on a unanimous vote.

#### **Letter to USDA-Forest Service requesting information on young growth timber practices:**

The Council supports the transition from old growth to second growth harvest on the Tongass National Forest; however, the Council has heard reports and testimony in past years that create concern about the impacts of the harvest of the second growth. The Council feels that second/young growth harvests should be done in such a manner as to have the least adverse impacts on subsistence uses. Motion by Mr. Johnson, seconded by Ms. Needham, to write a letter to the Forest Service describing the Council's expectations around young growth logging practices as it pertains to wildlife habitat and also requesting information about how the Forest Service expects to manage these stands. The motion passed on a unanimous vote.

## Agency Reports:

- Women’s Earth & Climate Action Network  
Rebekah Sawers and Wanda Culp, shared indigenous intellect and provided testimony on the group’s efforts to address issues important to indigenous people of Alaska such as land management, natural resources, management of food sovereignty, as well as housing, general services, and education. The group has submitted a food sovereignty proposal concept to seek traditional natural resource security for healthy communities, land, air, waters, and climate justice.
  - **Working Group Formed:**  
Motion by Ms. Needham, seconded by Mr. Casipit, to form a working group to gather information and stay informed on pending indigenous people’s interests such as Traditional Homelands Conservation Rule Petition, Indigenous Guardians Program, and Women’s Earth & Climate Action Network’s proposal concept. This group would report this information back to the Council for discussion and possible support of specific co-management efforts for the resources in Southeast. Council members of this Indigenous Co-Management Work Group are Don Hernandez, Albert Howard, Robert Schroeder, and Ian Johnson. The motion passed on a unanimous vote.
- USDA – Forest Service Agency Reports:
  - Earl Stewart, Forest Supervisor, Tongass National Forest, provided updates on several on-going projects: Central Tongass, South Revilla Integrated Resource Project, Twin Mountain II Timber Sale, and Hecla Greens Creek Tailing Expansion. Many actions are suspended pending “National Review,” which provides the Presidential appointees time to take their seats in the new Administration and to review pending items to assure that they are aligned with the new Administration’s National interest and objectives. Mr. Stewart answered various questions from the Council, including inquiries of the Tongass National Forest’s transition to young growth management and the Alaska Roadless Rule, and made a commitment to provide additional information in follow up after the meeting.
  - Terry Suminski, Subsistence Team Lead, Tongass National Forest, provided an overview of the special actions that have occurred since the last meeting
  - Melinda Hernandez-Burke, Regional Tribal Relations Specialist presented information on various opportunities for tribes and communities to share ecological knowledge and sustainable ways of living into monitoring projects and restoration of the Tongass National Forest
- Brent Vickers, OSM, presented the Office of Subsistence Management program updates which included information on the recent Council member appointee process and on the recent State of Alaska lawsuit (filed Aug 10, 2020, re: the Board’s adoption of some wildlife special actions)
- Joshua Ream, NPS, provided personnel updates for the National Park Service. He also informed the Council that the Park Service Subsistence Program has been working closely with the Alaska Native Science and Engineering Program recently and the Park Service is also developing further collaborations for the Partners for Fisheries Monitoring Program.

**Future Meeting Dates:**

Fall 2021 meeting to be held October 5-7, 2021, in Craig.

Winter 2022 meeting to be held March 22 – 24, 2021, in Sitka.

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DeAnna Perry, Designated Federal Officer  
USDA Forest Service

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Donald Hernandez, Chair  
Southeast Subsistence Regional Advisory Council

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

A more detailed report of this meeting, copies of the transcript, and meeting handouts are available upon request. Call DeAnna Perry at 1-800-478-1456 or 907-209-7817, email [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov).



# ADF&G • Boards Support Section

www.boards.adfg.state.ak.us

## ALASKA BOARD OF FISHERIES

### **2021/2022 CYCLE TENTATIVE MEETING SCHEDULE**

*(This tentative schedule shifts the 2020/2021 meeting to 2021/2022. Subsequent meeting cycles all shift down a year.)*

Prince William Sound Finfish and Shellfish (except shrimp); Southeast and Yakutat Finfish and Shellfish; Statewide All Shellfish (including Prince William Sound shrimp, excluding all other Prince William Sound shellfish, Southeast, and Yakutat)

<b>Meeting Dates</b>	<b>Topics</b>	<b>Location</b>	<b>Comment Deadline</b>
<b>October 20-21, 2021</b> [2 days]	<b>Work Session</b> ACRs, cycle organization, Stocks of Concern	<b>Anchorage</b> Egan Civic and Convention Center	Oct. 6, 2021
<b>Nov. 30-Dec. 6, 2021</b> [7 days]	<b>Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish</b> (Except shrimp)	<b>Cordova</b> The Cordova Center	Nov. 15, 2021
<b>January 4-15, 2022</b> [12 days]	<b>Southeast and Yakutat Finfish and Shellfish</b>	<b>Ketchikan</b> Ted Ferry Civic Center	Dec. 22, 2021
<b>March 10, 2022</b> [1 day]	<b>Hatchery Committee</b>	<b>Anchorage</b> TBD	Feb. 23, 2022
<b>March 11-16, 2022</b> [6 days]	<b>Cook Inlet, Kodiak, Westward, Arctic Shellfish and Shellfish General Provisions, and Prince William Sound Shrimp</b>	<b>Anchorage</b> TBD	Feb. 24, 2022

Proposal Deadline: Not applicable (*was April 24, 2020*)

Total Meeting Days: 28

Agenda Change Request Deadline: Monday, August 23, 2021 [*60 days prior to fall work session*]

*Updated July 19, 2021*



**Alaska Department of Fish and Game**  
**Board of Fisheries**  
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 Juneau, AK 99811-5526  
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## Long-Term Meeting Cycle

(Three-year cycle)

The board meeting cycle generally occurs from October through March. The board considers changes to regulations on a region-based schedule. The fisheries include subsistence, sport, guided sport, personal use, and commercial. Special petition and agenda change request procedures are available for the board to consider out-of-cycle requests.

**NOTES:**

- 1) In the year preceding a board cycle, the board will announce a call for proposal that prescribes which regions, species, and fisheries are set for regulatory review.
- 2) The proposal deadline is April 10 every year. If April 10 falls on a weekend, the proposal deadline is the Friday preceding that weekend.

<b>Meeting Areas and Species</b>
Prince William Sound Area all Finfish and Shellfish (except Shrimp) Southeast/Yakutat Areas all Finfish and Shellfish Cook Inlet, Kodiak, Westward, Arctic Shellfish and Shellfish General Provisions, and Prince William Sound Shrimp <i><b>Meeting Cycle Years:</b> 2021/2022 2024/2025 2027/2028 2030/2031</i>
Alaska Peninsula/Bering Sea-Aleutian Island/Chignik Areas all Finfish Arctic-Yukon-Kuskokwim Areas all Finfish Bristol Bay Area all Finfish Statewide Provisions for Finfish <i><b>Meeting Cycle Years:</b> 2022/2023 2025/2026 2028/2029 2031/2032</i>
Cook Inlet Area all Finfish Kodiak Area all Finfish <i><b>Meeting Cycle Years:</b> 2023/2024 2026/2027 2029/2030 2032/2033</i>

**The meeting cycle repeats itself every three years.** This schedule was adopted November 9, 1990 and revised based on workload and public participation.



**Division of Wildlife Conservation**  
**Eddie Grasser, Director**

Region I – Southeast Alaska  
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Douglas, AK 99824



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**Doug Vincent-Lang, Commissioner**

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## **Advisory Announcement**

**For Immediate Release: Jan. 19, 2021**

**CONTACT:** Tom Schumacher, 465-4359

[tom.schumacher@alaska.gov](mailto:tom.schumacher@alaska.gov)

### **Fall 2020 GMU 2 Wolf Harvest Announced**

(Douglas) – The Alaska Department of Fish & Game (ADF&G), Division of Wildlife Conservation (DWC) recently summarized wolf harvest in Game Management Unit 2 (Prince of Wales and associated islands) for the fall 2020 hunting and trapping seasons. Total reported harvest documented on sealing forms was 68 wolves.

ADF&G manages game and furbearer populations for sustainable harvest. Game Management Unit 2 (GMU 2) wolf harvest management changed in fall 2019 when new regulations and a new harvest management strategy were implemented. One important change was that the Alaska Board of Game established a fall population objective for GMU 2 of 150 to 200 wolves. The Board recognized the importance of deer to GMU 2 residents, and when setting that population objective, the Board discussed both the need for a sustainable wolf population and effects of wolf predation on deer.

Under this new strategy, harvest is managed to maintain the population within the objective range through annual changes in length of the harvest season. Although wolves may be harvested under state or Federal Subsistence (Federally managed lands only) hunting and trapping regulations, most wolves are harvested by trapping. Therefore, managers primarily regulate harvest by varying the length of the trapping seasons.

DWC sets harvest season length in consultation with Federal Subsistence managers from the U.S. Forest Service (USFS). State and Federal managers consider several factors when setting season length including the most recent GMU 2 wolf population estimate, harvest reported during the previous season, and observations of agency biologists, law enforcement entities, and GMU 2 residents. DWC and USFS managers set the fall 2020 trapping season length at three weeks, which resulted in a harvest of 68 wolves.

DWC managers believe the fall 2020 harvest was sustainable and anticipate that reproduction will result in a fall 2021 population within the objective range of 150-200 wolves. Effects of the 2020 harvest season on the GMU 2 wolf population will be better understood after the fall 2020 population estimate is completed. Samples for the DNA-based population estimate were collected from October – December 2020 by DWC and USFS biologists and by the Hydaburg Cooperative Association. Laboratory analysis of those samples should be completed by August and the fall 2020 estimate calculated by September 2021.

## Summary of Hunting/Trapping Regulatory Changes for 2021-2022

**This is a summary of changes adopted by the Alaska Board of Game for regulatory year 2021-2022. This is not a complete list of all detailed changes. It is your responsibility to read the Alaska Hunting and Trapping Regulations carefully for complete information. Contact your local ADF&G office if you have questions. These regulations become effective July 1, 2021, unless specifically addressed.**

### HUNTING CHANGES

#### MOOSE

**Unit 1C**, removed the antlerless moose hunt near Gustavus and Berners Bay. The Gustavus area hunt has not been held since 2008, and the Berners Bay hunt has not been held since 2006.

**Unit 5A, Nunatak Bench**, removed the antlerless component of the RM059.

**Unit 6C**, removed the antlerless moose hunt that has not been held since 1999.

**Unit 15B excluding Kalgin Island**, aligned all moose hunting seasons and bag limits in Unit 15B remainder. There is now an Aug. 22 – Aug. 29 archery only hunt for residents and nonresidents with a bag limit of one bull with spike or 50-inch antlers or antlers with 3 or more brow tines. The regular fall season in 15B remainder is now Sept. 1 – Sept. 25 for residents and nonresidents, with a bag limit of one bull with spike or 50-inch antlers or antlers with 3 or more brow tines.

#### WOLF

**Unit 2**, all wolves taken in Unit 2 must be sequentially numbered/marked by the hunter or trapper, and hunters and trappers must call the department within 7 days of take to report the date and location of take, and all hides must be sealed within 15 days of take.

### TRAPPING CHANGES

**Unit 2**, all wolves taken in Unit 2 must be sequentially numbered/marked by the hunter or trapper, and hunters and trappers must call the department within 7 days of take to report the date and location of take, and all hides must be sealed within 15 days of take.



40186

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submit a comment, please include the docket number for this rulemaking, indicate the specific section of this document to which each comment applies, and provide a reason for each suggestion or recommendation.

**Submitting comments.** We encourage you to submit comments through the Federal Decision Making Portal at <https://www.regulations.gov>. To do so, go to <https://www.regulations.gov>, type USCG-2021-0414 in the "SEARCH" box and click "SEARCH." Next, look for this document in the Search Results column, and click on it. Then click on the Comment option. If you cannot submit your material by using <https://www.regulations.gov>, call or email the person in the **FOR FURTHER INFORMATION CONTACT** section of this proposed rule for alternate instructions.

**Viewing material in docket.** To view documents mentioned in this proposed rule as being available in the docket, find the docket as described in the previous paragraph, and then select "Supporting & Related Material" in the Document Type column. Public comments will also be placed in our online docket and can be viewed by following instructions on the <https://www.regulations.gov> Frequently Asked Questions web page. We review all comments received, but we will only post comments that address the topic of the proposed rule. We may choose not to post off-topic, inappropriate, or duplicate comments that we receive.

**Personal information.** We accept anonymous comments. Comments we post to <https://www.regulations.gov> will include any personal information you have provided. For more about privacy and submissions in response to this document, see DHS's eRulemaking System of Records notice (85 FR 14226, March 11, 2020).

#### List of Subjects in 33 CFR Part 165

Harbors, Marine safety, Navigation (water), Reporting and recordkeeping requirements, Security measures, Waterways.

For the reasons discussed in the preamble, the Coast Guard is proposing to amend 33 CFR part 165 as follows:

#### PART 165—REGULATED NAVIGATION AREAS AND LIMITED ACCESS AREAS

■ 1. The authority citation for part 165 continues to read as follows:

**Authority:** 46 U.S.C. 70034, 70051; 33 CFR 1.05-1, 6.04-1, 6.04-6, and 160.5; Department of Homeland Security Delegation No. 0170.1.

■ 2. Add § 165.T05-0414 to read as follows:

#### § 165.T05-0414 Safety Zone; M/V ZHEN HUA 24, Crane Delivery Operation, Chesapeake Bay and Patapsco River, Baltimore, MD.

(a) *Location.* The following area is a safety zone: All waters of the Chesapeake Bay and Patapsco River, within 500 feet of the M/V ZHEN HUA 24 while it is transiting between Chesapeake Channel Lighted Buoy 90 (LLNR 7825) in position 38°58'18.53" N, 076°23'18.96" W, and the Seagirt Marine Terminal in position 39°15'02.43" N, 076°32'20.50" W, Baltimore, MD. These coordinates are based on WGS 84.

(b) *Definitions.* As used in this section—

*Captain of the Port (COTP)* means the Commander, U.S. Coast Guard Sector Maryland-National Capital Region.

*Designated representative* means a Coast Guard Patrol Commander, including a Coast Guard coxswain, petty officer, or other officer operating a Coast Guard vessel and a Federal, State, and local officer designated by or assisting the Captain of the Port Maryland-National Capital Region (COTP) in the enforcement of the safety zone.

(c) *Regulations.* (1) Under the general safety zone regulations in subpart C of this part, you may not enter the safety zone described in paragraph (a) of this section unless authorized by the COTP or the COTP's designated representative.

(2) To seek permission to enter, contact the COTP or the COTP's representative by telephone at 410-576-2693 or on Marine Band Radio VHF-FM channel 16 (156.8 MHz). Those in the safety zone must comply with all lawful orders or directions given to them by the COTP or the COTP's designated representative.

(d) *Enforcement officials.* The U.S. Coast Guard may be assisted in the patrol and enforcement of the safety zone by Federal, State, and local agencies.

(e) *Enforcement period.* This section will be enforced during inbound transit of the M/V ZHEN HUA 24 to the Port of Baltimore.

Dated: July 20, 2021.

**David E. O'Connell,**

*Captain, U.S. Coast Guard, Captain of the Port Sector Maryland-NCR.*

[FR Doc. 2021-15918 Filed 7-26-21; 8:45 am]

BILLING CODE 9110-04-P

#### DEPARTMENT OF THE INTERIOR

#### Fish and Wildlife Service

#### 50 CFR Part 17

[FF09E21000 FXES11110900000212]

#### Endangered and Threatened Wildlife and Plants; 90-Day Findings for Three Species

**AGENCY:** Fish and Wildlife Service, Interior.

**ACTION:** Notification of petition findings and initiation of status reviews.

**SUMMARY:** We, the U.S. Fish and Wildlife Service (Service), announce 90-day findings on two petitions to add species to the Lists of Endangered and Threatened Wildlife and Plants and one petition to remove a species ("delist") under the Endangered Species Act of 1973, as amended (Act). Based on our review, we find that the petitions to list the Alexander Archipelago wolf (*Canis lupus ligoni*) and western ridged mussel (*Gonidea angulata*) present substantial scientific or commercial information indicating that the petitioned actions may be warranted. Therefore, with the publication of this document, we announce that we plan to initiate status reviews of these species to determine whether the petitioned actions are warranted. We find that the petition to delist the golden-cheeked warbler (*Dendroica chrysoparia*) does not present substantial scientific or commercial information indicating the petitioned action may be warranted. Therefore, we are not initiating a status review of the species. To ensure that the status reviews are comprehensive, we are requesting scientific and commercial data and other information regarding the species and factors that may affect their status. Based on the status reviews, we will issue 12-month petition findings, which will address whether or not the petitioned actions are warranted, in accordance with the Act.

**DATES:** These findings were made on July 27, 2021. As we commence our status reviews, we seek any new information concerning the status of, or threats to, the species or their habitats. Any information we receive during the course of our status reviews will be considered.

#### ADDRESSES:

*Supporting documents:* Summaries of the basis for the petition findings contained in this document are available on <http://www.regulations.gov> under the appropriate docket number (see table under **SUPPLEMENTARY INFORMATION**). In addition, this

supporting information is available by contacting the appropriate person, as specified in **FOR FURTHER INFORMATION CONTACT**.

*Status reviews:* If you have new scientific or commercial data or other information concerning the status of, or threats to, the species for which we are initiating status reviews, please provide those data or information by one of the following methods:

(1) *Electronically:* Go to the Federal eRulemaking Portal: <http://www.regulations.gov>. In the Search box, enter the appropriate docket number (see table under **SUPPLEMENTARY**

**INFORMATION**). Then, click on the “Search” button. After finding the correct document, you may submit information by clicking on “Comment Now!” If your information will fit in the provided comment box, please use this feature of <http://www.regulations.gov>, as it is most compatible with our information review procedures. If you attach your information as a separate document, our preferred file format is Microsoft Word. If you attach multiple comments (such as form letters), our preferred format is a spreadsheet in Microsoft Excel.

(2) *By hard copy:* Submit by U.S. mail to: Public Comments Processing, Attn: [Insert appropriate docket number; see table under **SUPPLEMENTARY INFORMATION**], U.S. Fish and Wildlife Service, MS: PRB/3W, 5275 Leesburg Pike, Falls Church, VA 22041-3803.

We request that you send information only by the methods described above. We will post all information we receive on <http://www.regulations.gov>. This generally means that we will post any personal information you provide us.

**FOR FURTHER INFORMATION CONTACT:**

Species common name	Contact person
Alexander Archipelago wolf .....	Douglass Cooper, Ecological Services Branch Chief, Anchorage Fish and Wildlife Conservation Office, 907-271-1467, <a href="mailto:Douglass.Cooper@fws.gov">Douglass.Cooper@fws.gov</a> .
Golden-cheeked warbler .....	Adam Zerrenner, Field Supervisor, Austin Ecological Services Field Office, 512-490-0057 x248, <a href="mailto:Adam_Zerrenner@fws.gov">Adam_Zerrenner@fws.gov</a> .
Western ridged mussel .....	Paul Henson, State Supervisor, Portland Ecological Services Field Office, 503-231-6179, <a href="mailto:paul_henson@fws.gov">paul_henson@fws.gov</a> .

If you use a telecommunications device for the deaf, please call the Federal Relay Service at 800-877-8339.

**SUPPLEMENTARY INFORMATION:**

**Background**

Section 4 of the Act (16 U.S.C. 1533) and its implementing regulations in title 50 of the Code of Federal Regulations (50 CFR part 424) set forth the procedures for adding species to, removing species from, or reclassifying species on the Federal Lists of Endangered and Threatened Wildlife and Plants (Lists or List) in 50 CFR part 17. Section 4(b)(3)(A) of the Act requires that we make a finding on whether a petition to add a species to the List (*i.e.*, “list” a species), remove a species from the List (*i.e.*, “delist” a species), or change a listed species’ status from endangered to threatened or from threatened to endangered (*i.e.*, “reclassify” a species) presents substantial scientific or commercial information indicating that the petitioned action may be warranted. To the maximum extent practicable, we are to make this finding within 90 days of our receipt of the petition and publish the finding promptly in the **Federal Register**.

Our regulations establish that substantial scientific or commercial information with regard to a 90-day petition finding refers to credible scientific or commercial information in support of the petition’s claims such that a reasonable person conducting an impartial scientific review would conclude that the action proposed in the petition may be warranted (50 CFR

424.14(h)(1)(i); before 2016, 50 CFR 424.14(b)).

A species may be determined to be an endangered species or a threatened species because of one or more of the five factors described in section 4(a)(1) of the Act (16 U.S.C. 1533(a)(1)). The five factors are:

- (a) The present or threatened destruction, modification, or curtailment of its habitat or range (Factor A);
- (b) Overutilization for commercial, recreational, scientific, or educational purposes (Factor B);
- (c) Disease or predation (Factor C);
- (d) The inadequacy of existing regulatory mechanisms (Factor D); and
- (e) Other natural or manmade factors affecting its continued existence (Factor E).

These factors represent broad categories of natural or human-caused actions or conditions that could have an effect on a species’ continued existence. In evaluating these actions and conditions, we look for those that may have a negative effect on individuals of the species, as well as other actions or conditions that may ameliorate any negative effects or may have positive effects.

We use the term “threat” to refer in general to actions or conditions that are known to, or are reasonably likely to, affect individuals of a species negatively. The term “threat” includes actions or conditions that have a direct impact on individuals (direct impacts), as well as those that affect individuals through alteration of their habitat or required resources (stressors). The term

“threat” may encompass—either together or separately—the source of the action or condition, or the action or condition itself. However, the mere identification of any threat(s) may not be sufficient to compel a finding that the information in the petition is substantial information indicating that the petitioned action may be warranted. The information presented in the petition must include evidence sufficient to suggest that these threats may be affecting the species to the point that the species may meet the definition of an endangered species or threatened species under the Act.

If we find that a petition presents such information, our subsequent status review will evaluate all identified threats by considering the individual-, population-, and species-level effects and the expected response by the species. We will evaluate individual threats and their expected effects on the species, then analyze the cumulative effect of the threats on the species as a whole. We also consider the cumulative effect of the threats in light of those actions and conditions that are expected to have positive effects on the species—such as any existing regulatory mechanisms or conservation efforts that may ameliorate threats. It is only after conducting this cumulative analysis of threats and the actions that may ameliorate them, and the expected effect on the species now and in the foreseeable future, that we can determine whether the species meets the definition of an endangered species or threatened species under the Act.

If we find that a petition presents substantial scientific or commercial information indicating that the petitioned action may be warranted, the Act requires that we promptly commence a review of the status of the species, and we will subsequently

complete a status review in accordance with our prioritization methodology for 12-month findings (81 FR 49248; July 27, 2016).

**Summaries of Petition Findings**

The petition findings contained in this document are listed in the table below, and the basis for each finding, along with supporting information, is available on <http://www.regulations.gov> under the appropriate docket number.

TABLE—STATUS REVIEWS

Common name	Docket No.	URL to docket on <a href="http://www.regulations.gov">http://www.regulations.gov</a>
Alexander Archipelago wolf .....	FWS-R7-ES-2020-0147	<a href="https://www.regulations.gov/docket?D=FWS-R7-ES-2020-0147">https://www.regulations.gov/docket?D=FWS-R7-ES-2020-0147</a>
Golden-cheeked warbler .....	FWS-R2-ES-2016-0062	<a href="https://www.regulations.gov/docket?D=FWS-R2-ES-2016-0062">https://www.regulations.gov/docket?D=FWS-R2-ES-2016-0062</a>
Western ridged mussel .....	FWS-R1-ES-2020-0150	<a href="https://www.regulations.gov/docket?D=FWS-R1-ES-2020-0150">https://www.regulations.gov/docket?D=FWS-R1-ES-2020-0150</a>

*Evaluation of a Petition To List Alexander Archipelago Wolf*

Species and Range

Alexander Archipelago wolf (*Canis lupus ligoni*); Alaska and Canada.

Petition History

We received a petition on July 15, 2020, dated the same, from the Center for Biological Diversity, Alaska Rainforest Defenders, and Defenders of Wildlife, requesting that we list the Alexander Archipelago wolf as an endangered species or a threatened species and designate critical habitat for this species under the Act. The petition clearly identified itself as such and included the requisite identification information for the petitioner, required at 50 CFR 424.14(c). This finding addresses the petition.

Finding

Based on our review of the petition and sources cited in the petition, we find that the petition presents substantial scientific or commercial information indicating the petitioned action may be warranted for the Alexander Archipelago wolf due to potential threats associated with the following: Logging and road development (Factor A); illegal and legal trapping and hunting (Factor B); the effects of climate change (Factor E); and loss of genetic diversity and inbreeding depression (Factor E).

The basis for our finding on this petition, and other information regarding our review of the petition, can be found as an appendix at <http://www.regulations.gov> under Docket No. FWS-R7-ES-2020-0147 under the Supporting Documents section.

*Evaluation of a Petition To Delist Golden-Cheeked Warbler*

Species and Range

Golden-cheeked warbler (*Dendroica chrysoparia* = *Setophaga chrysoparia*); Texas, Mexico (Chiapas), and Central

America (Guatemala, Honduras, Nicaragua, and El Salvador).

Petition History

On December 27, 1990, the Service published in the **Federal Register** (55 FR 53153) a final rule to list the golden-cheeked warbler as an endangered species. On June 30, 2015, we received a petition dated June 29, 2015, from Nancie G. Marzulla (Marzulla Law, LLC—Washington, DC) and Robert Henneke (Texas Public Policy Foundation—Austin, TX) requesting that we remove the golden-cheeked warbler from the Federal List of Endangered and Threatened Wildlife (“delist” the species) due to recovery or error in information. The petition clearly identified itself as such and included the requisite identification information for the petitioner, required at now 50 CFR 424.14(c) (before 2016, 50 CFR 424.14(a)).

On December 11, 2015, we received supplemental information from the petitioners that included additional published studies and an unpublished report. These studies, as well as others known to the Service and in our files at the time the supplement was received, were considered, as appropriate. On June 3, 2016, we published in the **Federal Register** (81 FR 35698) our finding that the petition did not provide substantial scientific or commercial information indicating that the petition action may be warranted.

The General Land Office of Texas (GLO) challenged our June 3, 2016, negative 90-day finding on the petition to delist. The District Court found in favor of the Service. The GLO appealed the June 3, 2016, 90-day finding that decision, and the Circuit Court vacated and remanded it to the Service. This finding addresses the petition in response to the court’s decision.

Finding

Based on our review of the petition and sources cited in the petition, we find that the petition does not present

substantial scientific or commercial information indicating the petitioned action may be warranted for the golden-cheeked warbler. Because the petition does not present substantial information indicating that delisting the golden-cheeked warbler may be warranted, we are not initiating a status review of this species in response to this petition. However, we ask that the public submit to us any new information that becomes available concerning the status of, or threats to, this species or its habitat at any time by contacting the appropriate person listed under **FOR FURTHER INFORMATION CONTACT**, above.

The basis for our finding on this petition, and other information regarding our review of the petition, can be found as an appendix at <http://www.regulations.gov> under Docket No. FWS-R2-ES-2016-0062 under the Supporting Documents section.

*Evaluation of a Petition To List Western Ridged Mussel*

Species and Range

Western ridged mussel (*Gonidea angulata*); California, Oregon, Washington, Idaho, Nevada, and the Canadian Province of British Columbia.

Petition History

On August 21, 2020, we received a petition dated August 18, 2020, from the Xerces Society for Invertebrate Conservation, requesting that we list the western ridged mussel as an endangered species and designate critical habitat for this species under the Act. The petition clearly identified itself as such and included the requisite identification information for the petitioner, required at 50 CFR 424.14(c).

Finding

Based on our review of the petition and sources cited in the petition, we find that the petition presents substantial scientific or commercial information indicating that the petitioned action may be warranted for

the western ridged mussel due to potential threats associated with the following: Habitat destruction, modification, and curtailment of range; impacts to water quantity, water quality, and natural flow and temperature regimes; aquatic invasive species (Factor A); and disease (Factor C).

We find that the petition presents substantial scientific or commercial information indicating that regulatory mechanisms may be inadequate to ameliorate or reduce those threats (Factor D). We determined that the petition does not provide substantial documentation for the threats of overutilization of the species for commercial, recreational, scientific, or educational purposes (Factor B) and loss of genetic diversity (Factor E). The basis for our finding on this petition, and other information regarding our review of the petition, can be found as an appendix at <http://www.regulations.gov> under Docket No. FWS-R1-ES-2020-

0150 under the Supporting Documents section.

#### Conclusion

On the basis of our evaluation of the information presented in the petitions under sections 4(b)(3)(A) and 4(b)(3)(D)(i) of the Act, we have determined that the petitions summarized above for Alexander Archipelago wolf and western ridged mussel present substantial scientific or commercial information indicating that the petitioned actions may be warranted. We are, therefore, initiating status reviews of these species to determine whether the actions are warranted under the Act. At the conclusion of the status reviews, we will issue findings, in accordance with section 4(b)(3)(B) of the Act, as to whether the petitioned actions are not warranted, warranted, or warranted but precluded by pending proposals to determine whether any species is an endangered species or a threatened species. In addition, we have

determined that the petition summarized above for the golden-cheeked warbler does not present substantial scientific or commercial information indicating that the petitioned action may be warranted. We are, therefore, not initiating a status review of this species in response to this petition.

#### Authors

The primary authors of this document are staff members of the Ecological Services Program, U.S. Fish and Wildlife Service.

#### Authority

The authority for these actions is the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*).

#### Martha Williams,

*Principal Deputy Director Exercising the Delegated Authority of the Director, U.S. Fish and Wildlife Service.*

[FR Doc. 2021-15497 Filed 7-26-21; 8:45 am]

BILLING CODE 4333-15-P

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

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

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

- a. Tribes
- b. ANCSA Corporations

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

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

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

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

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

### **6. Public Testimony**

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

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

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

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

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

<b>WP22-03 Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP22-03 requests that all wolves taken in Unit 2 be sequentially numbered/marked by the hunter or trapper, that hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and that all hides must be sealed within 15 days of take. <i>Submitted by: Alaska Department of Fish and Game.</i>
<b>Proposed Regulation</b>	<p><b>Unit 2 –Wolf Hunting</b></p> <p><i>No limit. <span style="float: right;">Sept. 1-Mar. 31.</span></i></p> <p><i>Any wolf taken in Unit 2 <del>must be sealed within 30 days of the end of the season.</del> shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.</i></p> <p><b>Unit 2 –Wolf Trapping</b></p> <p><i>No limit. <span style="float: right;">Nov. 15-Mar. 31.</span></i></p> <p><i>Any wolf taken in Unit 2 <del>must be sealed within 30 days of the end of the season.</del> shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council</b>	
<b>Kodiak/Aleutians Subsistence Regional Advisory Council</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	



<b>WP22-03 Executive Summary</b>	
<b>Written Public Comments</b>	None

**DRAFT STAFF ANALYSIS**  
**WP22-03**

**ISSUES**

Wildlife Proposal WP22-03, submitted by Alaska Department of Fish and Game (ADF&G), requests that all wolves taken in Unit 2 be sequentially numbered/marked by the hunter or trapper, that hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and that all hides must be sealed within 15 days of take.

**DISCUSSION**

The proponent states current Federal sealing regulations no longer align with new State sealing regulations designed to gather more precise information from harvested wolves for use in ADF&G's annual Unit 2 wolf population estimates. Managing harvest of the Unit 2 wolf population to maintain the fall population within the objective range of 150-200 wolves relies on accurate and precise estimates of abundance. In 2019 when State and Federal regulations were updated to implement ADF&G's new Unit 2 wolf harvest management strategy, ADF&G neglected to consider the effect that changing the sealing requirement from within 14 days of harvest to within 30 days after the season closes would have on data used for population estimates. The purpose of this proposal is to correct that error by aligning Federal sealing regulations for wolves harvested in Unit 2 with State sealing requirements, updated by the Alaska Board of Game (BOG) at its March 18, 2021 meeting. The proponent believes this would eliminate confusion among users over which regulations apply to harvested wolves and enhance the ability of enforcement agencies to enforce regulations across land management jurisdictions.

The proponent explains that ADF&G annually estimates the number of wolves in Unit 2 using a non-invasive DNA-based spatially explicit capture-recapture method where wolf DNA is acquired when wolves roll on an array of scented hair boards throughout northern and central Prince of Wales Island. The Hydaburg Cooperative Association and US Forest Service (USFS) cooperate in this effort. For wolves detected at hair boards and subsequently harvested, harvest represents a "recapture" event that can be incorporated into population estimates. Recaptures are valuable for population estimates, particularly when users provide precise information on when and where individual wolves were harvested. The goal of this proposal is to ensure users can provide precise information for individual wolf hides at sealing. More precise data should result in more precise wolf population estimates. More precise estimates will allow managers to provide the greatest sustainable harvest opportunity while also maintaining the wolf population within the objective range.

Note: Wolves in Southeast Alaska are classified as a subspecies called the Alexander Archipelago wolf (*Canis lupus ligoni*) and will be referred to as Alexander Archipelago wolf/wolves throughout this analysis.

## Existing Federal Regulation

### Unit 2 –Wolf Hunting

*No limit.*

*Sept. 1-Mar. 31.*

*Any wolf taken in Unit 2 must be sealed within 30 days of the end of the season.*

### Unit 2 –Wolf Trapping

*No limit.*

*Nov. 15-Mar. 31.*

*Any wolf taken in Unit 2 must be sealed within 30 days of the end of the season.*

## Proposed Federal Regulation

### Unit 2 –Wolf Hunting

*No limit.*

*Sept. 1-Mar. 31.*

*Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~ shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.*

### Unit 2 –Wolf Trapping

*No limit.*

*Nov. 15-Mar. 31.*

*Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~ shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.*

## **Existing State Regulation**

### **Unit 2–Wolf Hunting**

*Residents and Non-residents—5 wolves*

*Dec. 1-Mar. 31*

*All wolves taken in Unit 2 shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.*

### **Unit 2–Wolf Trapping**

*Residents and Non-residents—No limit.*

*Nov. 15-Mar. 31*

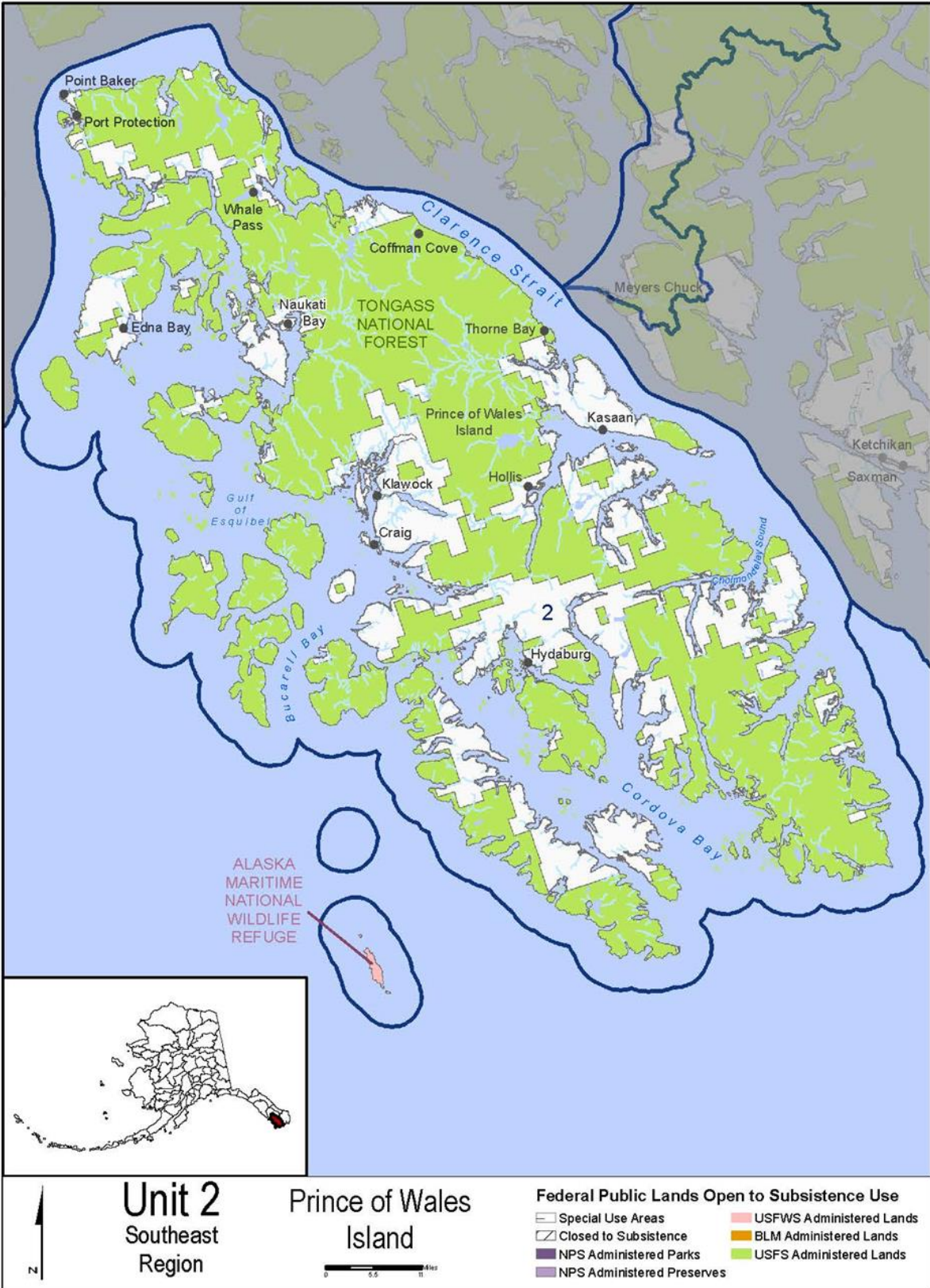
*All wolves taken in Unit 2 shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.*

## **Extent of Federal Public Lands**

Unit 2 is comprised of 71.7% Federal public lands and consists of 71.6% USFS managed lands and 0.1% U.S. Fish and Wildlife Service (USFWS) managed lands (**Map 1**).

## **Customary and Traditional Use Determinations**

The Federal Subsistence Board (Board) has not made a customary and traditional use determination (C&T) for wolves in Unit 2. Therefore, all Federally qualified subsistence users may harvest wolves in Unit 2.



Map 1. Unit 2

## Regulatory History

From 1915 through the early 1970s, the government paid a cash bounty for wolves in Southeast Alaska and, during the 1950s, the Federal government poisoned wolves in the region to increase deer numbers (Porter 2018). Following the discontinuance of the wolf bounty program, wolf hunting and trapping regulations in Unit 2 remained the same until 1992 (Larsen 1994).

In 1990, Federal hunting and trapping regulations were adopted from State regulations. State and Federal trapping seasons were Nov. 10-Apr. 30 with no harvest limits, and State and Federal hunting seasons were year-round with no harvest limits.

Also in 1990, an interagency committee sponsored by the USFS expressed concern about the viability of wolves in Southeast Alaska due to extensive timber harvesting on the Tongass National Forest (Porter 2018).

In 1992, the BOG restricted the State hunting season to Aug. 1-Apr. 30 and decreased the harvest limit to 5 wolves. The State hunting season has not changed since, and the State trapping season remained the same until 2019.

In 1993, the Biodiversity Legal Foundation and an independent biologist from Haines, Alaska, petitioned the USFWS to list the Alexander Archipelago wolf as a threatened subspecies pursuant to the Endangered Species Act (ESA) (Porter 2018).

In 1994, the Board adopted Proposal P94-02 to align the Federal wolf hunting season and harvest limit with the State hunting season (Aug. 1-Apr. 30 with a 5 wolf harvest limit).

In 1995 and 1997, the USFWS responded to the 1993 petition, finding the listing not to be warranted because the Alexander Archipelago wolf population appeared to be stable and because of a 1997 Tongass National Forest Management Plan, which identified a system of old-growth forest reserves geared toward conserving deer (primary prey of wolves) and, by extension, wolves (USFWS 1995, 2016, Porter 2003).

In 1997, the BOG implemented an annual Harvest Guideline Level (HGL) of 25% of the estimated Unit 2 fall wolf population (**Table 1**). The BOG established this maximum harvest level in response to a record and possibly unsustainable wolf harvest of 132 wolves in 1996 (Porter 2018). As the estimated wolf population was 360, the harvest quota was 90 wolves (see Biological Background section for sustainable harvest rates). The BOG also shortened the State hunting and trapping seasons to Dec. 1-Mar. 31 and required sealing within 30 days of harvest (Person and Logan 2012, Porter 2003).

Also, in 1997, the Board adopted Proposal P97-08 to align Federal wolf hunting and trapping seasons and sealing requirements with the new State regulations. The Board also required that wolves must have the radius and ulna of the left foreleg naturally attached to the hide until sealing. Foreleg bone

measurements are used as a proxy for wolf ages (pup, yearling, adult), providing population age structure and recruitment information.

In 1999, ADF&G closed the wolf season a month early (on February 29, 1999) because the HGL was predicted to be reached before the normal closing date (Person and Logan 2012, Bethune 2012, Porter 2003). Several new trappers worked Unit 2 in 1999 with good success, whereas historically only 3-4 trappers took more than 10 wolves each (Porter 2003).

In 2000, the BOG increased the HGL to 30% based on analyses indicating Unit 2 wolves experience low natural mortality (Porter 2018). The assumed wolf population was adjusted to 300 wolves, so the quota remained 90 wolves (Porter 2018).

In 2001, the Board adopted Proposal WP01-05 to shift both the hunting and trapping seasons from Dec. 1- Mar. 31 to Nov. 15- Mar. 15. The intent was to provide better access when less snow is on the ground and to coincide seasons with when wolf pelts are the most prime.

In 2003, the Board adopted Proposal WP03-10 with modification to extend the wolf hunting season from Nov. 15-Mar. 15 to Sep. 1-Mar. 31 to provide additional subsistence harvest opportunity, particularly during the fall deer hunting season and because wolf pelts prime early in Unit 2 (OSM 2003). The Board also delegated authority to the Craig and Thorne Bay District Rangers to close the Federal hunting and trapping season in consultation with ADF&G and the Chair of the Southeast Alaska Subsistence Regional Advisory Council (Council) when the combined Federal-State harvest quota is reached.

In 2007, the Board adopted Proposal WP07-15 with modification to change the closing date of the trapping season from March 15 to March 31 to provide more subsistence opportunity and to align the closing dates of State and Federal hunting and trapping seasons. The modification eliminated the requirement of leaving the radius and ulna of the left foreleg naturally attached to the hide until sealing.

In 2010, the ADF&G reduced the harvest quota to 60 wolves in response to a perceived decline in the wolf population (Porter 2018).

In 2011, the BOG changed the sealing requirement from 30 days to 14 days after harvest to help managers make quicker in-season management decisions (Bethune 2012).

Also in 2011, the Center for Biological Diversity and Greenpeace filed a second petition to list the Alexander Archipelago wolf as a threatened or endangered species under the ESA, including a request to consider Unit 2 wolves as a distinct population segment (DPS) (Porter 2018, Toppenberg et al. 2015).

In 2012, the Board adopted Proposal WP12-19 to change Federal sealing requirements to 14 days after harvest, aligning with State regulations. The Board shortened the sealing requirement to allow more efficient tracking of harvest to avoid exceeding harvest quotas.

From 2013-2018, ADF&G closed the Unit 2 wolf season early by emergency order because harvest quotas were expected to be met (**Table 1**). In 2014, ADF&G further reduced the harvest quota to 25 wolves based on recent population estimates (Porter 2018).

In 2015, the BOG revised the HGL to 20% in response to decreased population estimates and high estimates of unreported mortality (Porter 2018). As an additional conservation measure to account for unreported harvests and to address concerns about a declining population and potential listing under the ESA, State and Federal managers reduced the harvest quota by 50% (10% HGL) in 2015 and 2016 (**Table 1**) (SERAC 2017).

Also, in 2015, the Board rejected Special Action Request WSA15-13 to close the Federal wolf hunting and trapping seasons for the 2015/16 regulatory year to all users. The Board determined the closure was not warranted for either conservation concerns or continuation of subsistence uses, noting that ADF&G and the USFS had established a very conservative harvest quota for the year.

In January 2016, the USFWS issued another “not warranted” finding in response to the 2011 ESA petition as the Alexander Archipelago wolf appeared stable and viable across most of its range (USFWS 2016, Porter 2018). Additionally, the USFWS determined that Unit 2 wolves did not meet the criteria for a DPS designation (persisting in a unique ecological setting, marked genetic differences, comprising a significant portion of the range) (USFWS 2016, Porter 2018).

In 2018, the Board rejected WP18-04 to increase the HGL to 30% under Federal regulations. The Council had submitted the proposal because it believed previous quotas were too conservative and did not accurately reflect the Unit 2 wolf population. The Board rejected the proposal due to conservation concerns over unsustainable harvests as well as concerns about the difficulty of State and Federal managers implementing separate quotas, which would also create confusion among users (FSB 2018). However, the Board expressed desire for the USFS and ADF&G to work together to find a sustainable solution to the Unit 2 wolf issue (FSB 2018).

In October 2018, the Board issued a new delegation of authority letter to the in-season managers of Unit 2 wolves. The new letter stated that the in-season managers could close, reopen, or adjust the Federal hunting and trapping season for wolves in Unit 2. Coordination with ADF&G, OSM, and the Council Chair is required.

In 2018, the BOG received three proposals for Unit 2 wolves for the 2018/19 regulatory cycle (effective July 1, 2019). The Council submitted Proposal 42 to increase the HGL to 30%. ADF&G submitted Proposal 43 to change the harvest management strategy from using HGLs to meeting specified population objectives. Proposal 43 also proposed changing the sealing requirement for the State trapping season to 30 days after the close of the season as the new management strategy would not depend on in-season harvest management (ADF&G 2019d). The Craig Fish and Game Advisory Committee (Craig AC) submitted Proposal 44 to change the opening date of the wolf trapping season from Dec. 1 to Nov. 15, which would align with the Federal trapping season opening date. The Council and ADF&G had identified the need for population objectives for Unit 2 wolves to clarify and direct



management and that population objectives should be set through a transparent, public process (Porter 2018, SERAC 2017). The Council withdrew Proposal 42 in support of Proposal 43.

In January 2019, the BOG adopted Proposal 43 as amended, which had overwhelming support from five Advisory Committees and the public (SERAC 2019, ADF&G 2019d). The BOG established the population objective range for Unit 2 wolves as 150-200 wolves (see Biological Background section) (ADF&G 2019a). The BOG also adopted Proposal 44, extending the State trapping season to align with the Federal season.

In 2019, the Council submitted Wildlife Special Action Request WSA19-02 to extend the sealing period for wolf hunting and trapping and to remove language referencing a combined Federal-State harvest quota for wolves in Unit 2 for the 2019/20 regulatory year. In August 2019, the Board approved WSA19-02, stating that the new management strategy should help ensure a sustainable population and encourage better harvest reporting. The Board also stated that announcing predetermined season lengths provides predictability to users and renders the in-season sealing requirement unnecessary (ADF&G 2019f).

In late October 2019, ADF&G and the USFS announced that 2019/20 State and Federal hunting and trapping seasons for wolves in Unit 2 would close on January 15, 2020, resulting in a two month trapping season based on the unit-wide population estimate of 170 wolves. Under the new harvest management strategy, when the most current population estimate is within the objective range of 150-200 wolves, the trapping season may be up to two months long (see Biological Background for more information on the new harvest management strategy) (ADF&G and USFS 2019).

In April 2020, the Board adopted Proposal WP20-16/17. WP20-16 requested extending the sealing period for wolf trapping in Unit 2 from within “14 days of harvest” to “within 30 days of the end of the season” and removing language referencing a combined Federal-State harvest quota. WP20-17 requested the same sealing period extension and removal of harvest quotas for wolf hunting in Unit 2, as well as increasing the hunting harvest limit from “5 wolves” to “no limit”. The proposed changes mirrored the requests of WSA19-02 with the exception of changing the hunting harvest limit to “no limit.” The Board adopted these proposals to facilitate management of the wolf population and reduce regulatory complexity by aligning Federal and State regulations, noting that the majority of wolves harvested in Unit 2 are taken on State-managed lands. The Board also stated that extending the sealing requirement reduced the regulatory burden on Federally qualified subsistence users. Proposals WP20-16/17 were also supported by the Council, ADF&G, and the Interagency Staff Committee (FSB 2020).

Also, in 2020, Emergency Wildlife Special Action WSA20-08 submitted by Alaskans for Wildlife requested delaying the opening date of the wolf hunting season in Unit 2 from September 1 to November 1. This was intended to allow time for the 2019 population estimate to become available. The new harvest management strategy adopted by the Board and the BOG relies on population estimates to set season lengths. ADF&G reported delays in lab analysis of the DNA samples due to the COVID-19 pandemic and did not expect the population estimates before mid-to-late September. Lack of a population estimate required a cautious approach to wolf management given the high reported

wolf harvest in 2019. The Federal in-season manager used their delegated authority to announce the delayed opening date of October 31 to allow time for the population estimate to become available. Population data were released on October 26, 2020, estimating 316 wolves. Harvest effort during fall 2019 was much higher than anticipated (165 wolves) and resulted in an unsustainable level of harvest (>50%). After a public hearing on October 29, 2020, managers limited State and Federal wolf trapping seasons in Unit 2, closing all seasons on December 5, 2020. Federally qualified users had 36 days of hunting and 21 days of trapping opportunity for wolves in Unit 2 for the 2020 season (ADF&G and USFS. 2020a, ADF&G and USFS. 2020b).

In March 2021, the BOG adopted Proposal 194 as amended, requiring all wolves taken in Unit 2 to be sequentially numbered/marked by the hunter or trapper. In addition, it required hunters and trappers to call the ADF&G within seven days of take to report the date and location of take for each wolf, and that all hides must be sealed within 15 days of take. ADF&G brought Proposal 194 before the BOG to correct an unforeseen consequence of a 2019 change in regulation. The reduction in reporting and sealing time would allow for more precise information to improve population estimates. The Southeast Alaska Subsistence Regional Advisory Council (Council) opposed Proposal 194 as it was presented especially if it was implemented in a shortened wolf season. Proposal 194 required wolves to be sealed within seven days of harvest. The Council expressed concerns that a seven day after harvest sealing requirement could affect a trapper's ability to trap efficiently while meeting weekly sealing requirements. The Council stated they would support a sealing requirement of seven days after the end of the season and a companion Federal proposal should be submitted. Proposal 194 was amended twice. The amendments changed the sealing requirement from seven days after harvest to 15 days after harvest and added the requirement to call ADF&G within seven days of harvest to report the date and location of the wolf harvest. Additionally, the amendments also required hunters and trappers to sequentially number/mark the hides (ADF&G 2021).

**Table 1.** Management data for Unit 2 wolves using the Harvest Guideline Level (HGL) management strategy (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G and USFS 2019, Schumacher 2021, pers. comm).

Regulatory Year	Population Estimate*	Harvest Guideline level (HGL %)	Harvest Quota	Reported Harvest	Date closed by State Emergency Order
1996				132	
1997	360	25	90	78	
1998	360	25	90	91	
1999	360	25	90	96	Feb. 29
2000	300	30	90	73	
2001	300	30	90	62	
2002	300	30	90	64	
2003	300	30	90	33	
2004	300	30	90	77	
2005	300	30	90	60	
2006	300	30	90	38	
2007	300	30	90	36	
2008	300	30	90	24	
2009	300	30	90	22	
2010	200	30	60	28	
2011	200	30	60	28	
2012	200	30	60	52	
2013	200	30	60	57	Mar. 19
2014	221	30	25	29	Feb. 22
2015	89	20	9	7	Dec. 20
2016	108	20	11	29	Dec. 21
2017	231	20	46	61	Dec. 16
2018	225	20	45	44	Dec. 18/21**
2019	170	n/a	n/a	165	Jan. 15***
2020	316	n/a	n/a	68	Dec. 5****

\* Population estimates from 1997-2013 were assumed estimates based on harvest levels and a 1994 population estimate. Population estimates from 2014-2020 are from DNA-based spatially explicit capture-recapture studies (see Biological Background section).

\*\* Season closed by Emergency Order on Dec. 18 but reopened to Dec. 21 because bad weather prevented trappers from recovering gear.

\*\*\*Season closing date announced according to the new harvest management strategy.

\*\*\*\*Federal hunting season was closed September 1 and reopened on October 31 to allow time to acquire the 2019 population estimate (ADF&G and USFS. 2020b).

## Current Events Involving the Species

In July 2020, the Center for Biological Diversity, Alaska Rainforest Defenders, and Defenders of Wildlife submitted a petition to the U.S. Department of the Interior to list the Alexander Archipelago wolf in Southeast Alaska as threatened or endangered under the ESA (Wolf et al. 2020).

On July 27, 2021, the USFWS announced in a 90-day finding that the petition to list the Alexander Archipelago wolf presented substantial information, including illegal and legal trapping and hunting, indicating that the petitioned action may be warranted. Therefore, the USFWS will initiate a status review to determine whether the petitioned action is warranted.

## Biological Background

Unit 2 wolves are part of the Alexander Archipelago wolf subspecies, which ranges from coastal British Columbia north to Yakutat, Alaska, and includes the islands in Southeast Alaska, excluding Unit 4 (USFWS 2015). Alexander Archipelago wolves tend to be smaller with shorter hair than continental wolves and can be genetically differentiated (USFWS 2015, Porter 2018). Because of the relatively high density of prey available, the islands of Unit 2 have long been assumed to support the highest densities of wolves in Alaska (Porter 2018). Using the best available data and modeling, USFWS (2015, 2016) estimated that the 2013 and 2014 Unit 2 wolf population comprised 13% (130-378 wolves) and 6% (50-159 wolves) of the total Alexander Archipelago wolf population (865-2,687 wolves), respectively. Indeed, USFWS (2015) notes that even the low, 2014 wolf density estimates for Unit 2 (9.9 wolves/1,000 km<sup>2</sup>) are not particularly low by most standards for Northern wolf populations (Fuller et al. 2003).

State management objectives for Unit 2 wolves include:

- Manage harvest to meet a population objective of 150-200 wolves.

From 1997, when the HGL management strategy was implemented, through 2013, Unit 2 wolf abundance was uncertain. Managers based decisions (e.g. harvest quotas) on assumed population levels, sealing records, and a 1994 population estimate (SERAC 2019, ADF&G 2019b, Porter 2003). Person and Ingle (1995) used a simulation model using radio-collared wolf data collected for a graduate research project estimated that 321 wolves and 199 wolves inhabited Unit 2 in fall 1994 and spring 1995, respectively (Porter 2003). The smaller spring estimate reflects overwinter mortality, primarily from trapping (Porter 2003). Between 1998 and 2002, Porter (2003) assumed the Unit 2 wolf population had remained relatively abundant because of consistently high harvests, which provided a population index.

Several methods have been used to improve the accuracy of wolf populations estimates. Since 2013, ADF&G in cooperation with the USFS, the Hydaburg Cooperative Association, and The Nature Conservancy have employed a DNA-based spatially explicit capture-recapture (SECR) method to estimate Unit 2 wolf abundance (SERAC 2019, ADF&G 2019b). This method has been found to be the most robust and least biased method of estimating wolf populations in forested habitats (Roffler et al.

2016). The study uses hair boards equipped with scent lure to attract wolves and barbed wire to obtain hair samples that are sent to a lab for DNA analysis. Samples are collected from mid-October through December and lab results are usually available in late July (SERAC 2019, ADF&G 2015). Thus, harvest management decisions are made with last year's wolf population estimate. While these surveys and population estimates are currently conducted annually, they are expensive and labor intensive. Therefore, ADF&G will likely transition to conducting population estimates every 2-3 years in the future (ADF&G 2019d).

Recent population estimates suggest that the Unit 2 population has been growing. Between 2013 and 2020, Unit 2 wolf population estimates have ranged from 89-316 wolves (**Table 1, Figure 1**) (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G, and USFS. 2020a). While the point estimates for the first two years differ drastically, statistically, no difference exists between the two estimates due to overlapping confidence intervals (C.I.). As the study progressed, more hair boards were deployed, more wolves were recaptured in subsequent years, and staff became more skilled at handling samples, resulting in tighter 95% confidence intervals. The wolf population estimate increased significantly between 2016 and 2017. The most recent 2020 estimate was 316 wolves, with a 95% C.I. of 250-398 wolves (ADF&G and USFS 2020a). In addition to SECR population estimates, local hunters and trappers have expressed seeing many more wolves in recent years (SERAC 2017, 2018).

Carroll et al. (2014) considered wolf populations <150-200 individuals as small, and USFWS (2015) notes that most minimum viable population estimates for gray wolves range between 100 and 150 wolves. However, despite the comparatively small size and insularity of the Unit 2 wolf population, inbreeding probably is not affecting it (Breed 2007, USFWS 2015).

Humans cause the majority of wolf mortality in Unit 2. Natural causes account for only 4% of the annual mortality of the Unit 2 wolf population, while human-caused mortality accounts for the remainder (Person and Russell 2008, Wolf Technical Committee 2017). Person and Russell (2008) studied 55 radio-collared wolves in Unit 2 from 1993-2004: 39 wolves (71%) were killed by humans, while only 5 (9%) died from natural causes. Similarly, ADF&G collared an additional 12 wolves from 2012-2015, and 8 (67%) were killed by humans, while only 1 (8%) died from natural causes (USFWS 2015). However, these studies took place in portions of Unit 2 where road access was greater, likely resulting in higher harvest. Therefore, human-caused mortality rates may be potentially inflated (USFWS 2015).

While wolves are generally resilient to high levels of harvest and human activity (USFWS 2015, Weaver et al. 1996), over-exploitation can still be a risk. Wolves usually buffer human predation with their high potential annual productivity and long dispersal abilities. If sufficient prey is available, wolves can rapidly repopulate areas depleted by hunting and trapping (USFWS 2015, Ballard et al. 1987). However, due to differences in wolf population characteristics (e.g. sex/age structure), a universal, sustainable human-caused mortality rate does not exist, and the Unit 2 wolf population may be particularly vulnerable to overexploitation due to its insularity and lack of immigration (USFWS 2015, Wolf Technical Committee 2017). Person and Russell (2008) reported that a >38% total annual

mortality rate for Unit 2 wolves was likely unsustainable based on past harvest rates and population estimates. The ADF&G Regional Wildlife Supervisor for Southeast Alaska stated that other wolf research and the scientific literature indicate that a healthy wolf population can sustain 30% annual mortality (SERAC 2017). Additionally, wolf harvest records indicate neither offering a cash bounty nor poisoning wolves during the early 20<sup>th</sup> century had any lasting effects on wolf abundance or distribution on Southeast Alaska islands (Porter 2018).

Alexander Archipelago wolves start breeding at 22-34 months of age, and litter sizes range from 1-8 pups, averaging 4.1 pups (USFWS 2015, Person et al. 1996, Person and Russell 2009). Person and Russell (2008) reported survival rates for Unit 2 wolves > 4 months of age as 0.54 between 1993 and 2004 (USFWS 2015). Den use occurs from mid-April through early-July, after which pups are relocated to rendezvous sites usually <1 km from their den where they remain until October (USFWS 2015, Person and Russell 2009). Pack sizes on Prince of Wales Island (POW) average 7.6 wolves in the fall and 4.0 wolves in the spring, and home range sizes average 535 km<sup>2</sup>, which is a quarter of the size estimated for wolves on the northern mainland of southeastern Alaska (ADF&G 2015d as cited in USFWS 2015).

#### New Harvest Management Strategy

Unit 2 is a good place to implement population objectives because there is very little dispersal into and out of the unit (ADF&G 2019d). The new wolf management strategy consists of four management zones (**Figure 2**). Zone 1 sets the minimum wolf population threshold at 100 wolves and seasons remain closed until the wolf population recovers. Zone 2 is the conservation zone, where the wolf population is estimated between 100-149 wolves, with seasons of up to six weeks to provide limited harvest opportunity and a buffer to recover the population before it declines into Zone 1. In Zone 3, the population objective range is 150-200 wolves. This is the desirable zone, and harvest would occur during seasons of up to eight weeks. When the population is in Zone 3, SECR population estimates would only be conducted every 2-4 years. Zone 4 is the over-objective zone where wolf numbers exceed 200, and seasons of up to 4 months are geared toward population reduction (ADF&G 2019b). An issue with this new strategy is the one-year time lag in obtaining population estimates. For example, if the wolf population is in Zone 1, an additional trapping season would occur before managers learned this (ADF&G 2019b, 2019c). However, the HGL management strategy also announced harvest quotas based on population estimates that were at least one year old and, prior to 2014, were assumed estimates (**Figure 1**). State and Federal managers will announce season lengths annually before November 15, the opening date for Federal and State trapping seasons (OSM 2020).

Setting these population objectives incorporates biological as well as social concerns as various user groups have strong and differing opinions about wolves in Unit 2 (e.g. subsistence deer hunters view wolves as competitors, ESA petitioners view wolves as threatened) (SERAC 2017, 2018, Wolf Technical Committee 2017, ADF&G 2019d). The population objectives also included traditional knowledge. The Craig Tribal Association testified that the USFS determined 150-200 wolves to be a sustainable range after talking with local and traditional knowledge holders on POW (SERAC 2017).

Similarly, a working group of the Council also thought the population objective range should be 150-200 wolves, which is the range the BOG adopted (SERAC 2017).

### Stressors

Unit 2 wolves experience numerous stressors, including harvest, logging, road development, and climate-related events (USFWS 2015, Porter 2018). In their comprehensive status assessment for the Alexander Archipelago wolf, the USFWS (2015) determined the Unit 2 wolf population had low resiliency due to high rates of unreported harvest, high rates of timber harvest with detrimental effects on deer, high insularity (little immigration or emigration), and high levels of boat and road access for hunters and trappers.

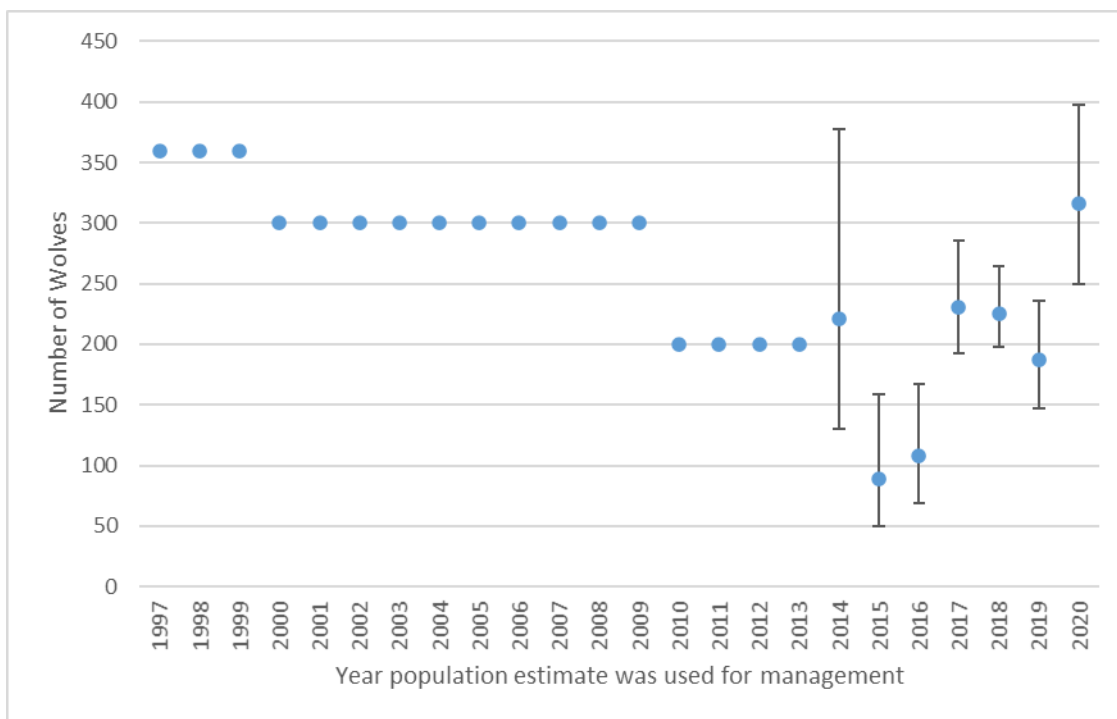
The presence of wolves in an area is closely linked with prey availability (USFWS 2015). While Unit 2 wolves feed on a variety of species including beavers and salmon, deer are their primary prey (USFWS 2015, Porter 2018). Both the comprehensive conservation assessment (Person et al. 1996) and the species status assessment (USFWS 2015) prepared in response to the 1993 and 2011 ESA listing petitions, respectively, identified maintaining deer populations as a primary conservation measure for Alexander Archipelago wolves (Porter 2018). Wolf abundance may be especially linked to deer abundance and availability in Unit 2 where other ungulate prey species (e.g. moose, elk, caribou) are not present (USFWS 2015).

Deer are primarily limited by habitat rather than by predation (SERAC 2017, USFWS 2015). In Unit 2, deer habitat is adversely affected by industrial-scale logging of old-growth forests, which has occurred in the unit since the 1950s and peaked in the 1980s (USFWS 2015). Clear-cut logging has been the primary timber harvesting method and, as of 2015, 23% of forests in Unit 2 were logged (Shanley 2015 as cited in USFWS 2015). Albert and Schoen (2007) modeled deer habitat capability in Unit 2 for two time periods (1954 and 2002), determining it to have lost 38% and 11% of its habitat value in northern and southern POW, respectively (USFWS 2015). USFWS (2015, 2016) predict that past timber harvest in Unit 2 will result in 21-33% declines in the deer population and 8-14% declines in the wolf population over the next 30 years, with future timber harvest exacerbating these declines. However, in 2014 (most recent information available), the Unit 2 deer population appeared to be stable to slowly increasing (Bethune 2015). USFWS (2016) states the rate of future timber harvest is difficult to project.

Declines in understory vegetation correspond with decreased deer carrying capacity (USFWS 2015). Severe (deep snow) winters often result in deer population declines (e.g. Brinkman et al. 2011), and these effects are exacerbated by loss of old-growth forests. Old-growth forests have multi-layered canopies that intercept snow and moderate temperature and wind, providing shelter for and facilitating movements of deer in the winter (USFWS 2015, Porter 2018). They also maintain diverse understories that provide continuous forage for deer (USFWS 2015). Conversely, clear-cuts may temporarily provide deer with winter forage, but this forage can be buried during winters with deep snow (Porter 2018). The initial flush of forbs and shrubs in clear-cuts provide deer with lower-quality forage, and regenerating trees shade out the understory vegetation after 20-35 years (Porter 2018, USFWS 2015).

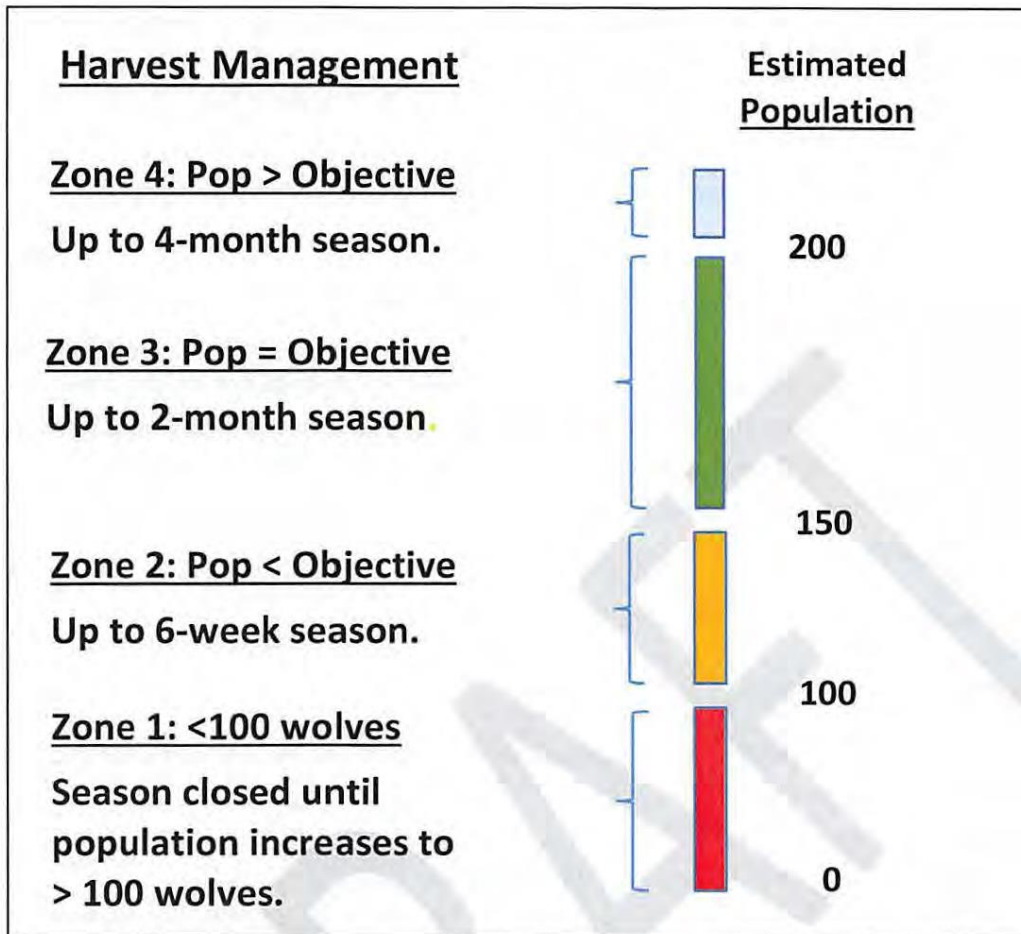
Since Unit 2 timber harvest peaked in the 1980s, many stands are entering the successional stage that is very poor deer habitat (USFWS 2015).

In addition to altering the habitat of their primary prey species, logging also impacts Unit 2 wolves by constructing roads that provide relatively easy access for hunters and trappers into previously remote areas (Porter 2018, USFWS 2015). Person and Russell (2008) found roads clearly increased risk of death for POW wolves from hunting and trapping and contributed to unsustainable harvest rates. They also determined road density to be an important predictor of harvest up to 0.9 km of road per square kilometer (km/km<sup>2</sup>). Above this threshold, increased road density did not correspond to increased harvest rates. Mean road density in Unit 2 is 0.62 km/km<sup>2</sup>, ranging from 0-1.57 km/km<sup>2</sup> (Albert 2015 as cited in USFWS 2015). Person and Logan (2012) believed harvest from the densely roaded northcentral and central portions of POW were frequently unsustainable. The USFS aims to shift timber harvest to regenerating stands and away from old-growth stands, which also allows for the use of existing roads as opposed to constructing new ones (USFWS 2015, 2016).



**Figure 1.** Unit 2 wolf population estimates, 1997-2020. Estimates from 1997-2013 are assumed from sealing records and a 1994 population estimate. Estimates from 2014-2020 are from a DNA mark/recapture study. The error bars represent 95% confidence intervals. Estimates take a year to determine; thus the population estimate for 2014 was used to set 2015 harvest quotas. The population estimates in this graph reflect the one year time lag (e.g. the 2015 population estimate actually reflects wolf numbers during fall 2014, but was used to set harvest quotas for the 2015 season) (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G 2020b, ADF&G and USFS 2019, ADF&G and USFS. 2020a, Schumacher 2021, pers. comm).





**Figure 2.** Population thresholds and harvest management strategies for the Unit 2 wolf population. The BOG adopted population objectives of 150-200 wolves in 2019 (figure from ADF&G 2019b).

### Cultural Knowledge and Traditional Practices

Wolves have had significant economic and cultural importance throughout Southeast Alaska. Wolves were traditionally harvested for furs and hides throughout their range in Southeast Alaska (ADF&G 2008). Historically the fur of this species was used in making ceremonial masks, blankets, robes, and other articles of clothing (ADF&G 2008). The furs and hides were traded between communities and with other regions of the state (De Laguna 1972, Oberg 1973, Petroff 1884).

Traditionally, wolves were harvested in the late fall and early winter because the fur was considered prime during these seasons and there was no deep snow to restrict travel (ADF&G 2008). Trapping usually started in November and continued through December, and was accomplished with snares and deadfalls set across game trails frequented by wolves (ADF&G 2003, ADF&G 2008, De Laguna 1972, Goldschmidt and Haas n.d. [1946], Goldschmidt and Haas 1998, Oberg 1973). Families built and maintained trapping cabins in remote areas exhibiting high furbearer abundance and placed them in

accordance with clan ownership rights (Goldschmidt and Haas 1998). Harvest areas were traditionally owned by clans that were inherited through family lineages (ADF&G 2008).

Wolves also occupy important symbolic roles, particularly with both Tlingit and Haida communities. Tlingit society is divided into two moieties, which include the Raven and Eagle/Wolf (Emmons 1991). Within the moieties, several clans claim wolves as symbols or crests (Swanton 1909). Members of wolf clans ceremonially address wolves as relatives and believe the animals embody their ancestors (ADF&G 2008). Haida people believed in similar relationships between wolves and people. In Haida practices, however, the wolf is claimed by the Raven rather than the Eagle moiety (Blackman 1998).

The wolf's mythical and symbolic nature within Tlingit culture resulted in great care and respect being shown to both the living and harvested members of this species (ADF&G 2008). Wolves were not normally eaten, except as a famine food (ADF&G 2008).

Preparation of animal skins was traditionally assigned to women in both Tlingit and Haida cultural groups (Blackman 1998, Emmons 1991). The order of value among available furs within the Tlingit culture was sea otter, marten, beaver, river otter, black fox, mink, wolverine, wolf, and bear (Oberg 1973). Wolves contemporarily retain cultural value, and wolf harvest, sharing, and use have been recently documented in many areas of Southeast Alaska (ADF&G 2008). Wolf fur continues to be used in Native handicrafts such as blankets, ceremonial robes, winter coat ruffs, and art, but are also sold to commercial fur traders (ADF&G 2008).

Though wolves traditionally and contemporarily play important cultural and economic roles within Southeast Alaska, wolves are also now seen as a direct competitor for an important subsistence food source in Unit 2 – deer (Wolf Technical Committee 2017). Wolves also present other considerations for area residents including their role in both consumptive and non-consumptive tourism, as a top predator within the ecological system, and as a potential threat to humans and pets. It is believed that improving forage production within young-growth stands that are near areas preferred for human hunting of deer will help to alleviate some of the human-wolf-deer tensions in Unit 2 (Wolf Technical Committee 2017).

### **Harvest History**

From the 1950s through the mid-1990s, wolf harvest in Unit 2 increased in conjunction with a growing human population and increased road access associated with the logging industry, peaking at 132 wolves in 1996 (**Figure 3**) (Porter 2018). Since 1996, trapper numbers in Unit 2 have generally been declining, possibly due to an aging trapper pool and a human population that is decreasing in response to fewer timber-related jobs (Bethune 2012). Between 1997 and 2018, total trapper numbers in Unit 2 ranged from 4-26 trappers per year, averaging 14.5 trappers per year (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018). Over the same time period, trappers living in Unit 2 accounted for 60-100% of the annual Unit 2 wolf harvest, averaging 89% (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018). Most of the non-local resident harvest is by residents of adjacent communities, including Ketchikan, Petersburg, Wrangell, and Sitka (Schumacher 2019, pers. comm. as cited in OSM 2020). In 2019, total trapper numbers in Unit 2 increased substantially, with 32 trappers

sealing wolves from Unit 2 (ADF&G 2020a). (Note: As there is no customary and traditional use determination for wolves in Unit 2, all rural residents are Federally qualified subsistence users. Ketchikan and Juneau are the only non-rural communities in Southeast Alaska).

Between 1997 and 2018, average catch ranged from 1.8-5.5 wolves per trapper, averaging 3.4 wolves per trapper (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Porter 2003). However, in most years, just 2-3 skilled trappers harvest most of the wolves (Schumacher 2019, pers. comm. as cited in OSM 2020). Between 1996 and 1998, ADF&G conducted household harvest surveys in all POW communities (ADF&G 2019e). The communities of Klawock and Craig accounted for 80% of the POW wolf harvest, and <.05% of POW residents attempted to harvest wolves (ADF&G 2019e).

Unit 2 wolf harvest is primarily monitored through mandatory sealing of pelts (Porter 2018). Harvest primarily occurs on non-Federal lands, including tide lands (ADF&G 2019d, SERAC 2017, Person and Logan 2012). Most wolves are harvested under a combination hunting/trapping license (Schumacher 2019, pers. comm. as cited in OSM 2020). The only wolves known to be taken under a hunting license are harvested from Sept. 1-Nov. 14 during the Federal hunting season, but before State and Federal trapping seasons open (Schumacher 2019, pers. comm. as cited in OSM 2020). In Unit 2, wolves can be harvested with a firearm under a trapping license under both State and Federal regulations.

Between 1997, when the HGL was initiated (see Regulatory History), and 2018, annual reported wolf harvest has ranged from 7-96 wolves, averaging 50 wolves (**Figure 3**) (Schumacher 2019, pers. comm. as cited in OSM 2020). The annual harvest quota has been exceeded five times (**Table 1**). Most wolves are harvested using traps and relatively few are shot. Between 1997 and 2018, 21%, 53%, and 25% of harvested wolves were shot, trapped, and snared, respectively (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). In 2019, the first year under the new harvest management strategy without any quotas, the reported wolf harvest was 165 wolves, which is the highest number ever recorded in Unit 2 (ADF&G 2020a). ADF&G (2020a) noted that trapper harvest depends primarily on trapper effort and believes the unusually high harvest in 2019 resulted from a doubling of the normal trapping effort (32 trappers v. the historical average of 14.5 trappers).

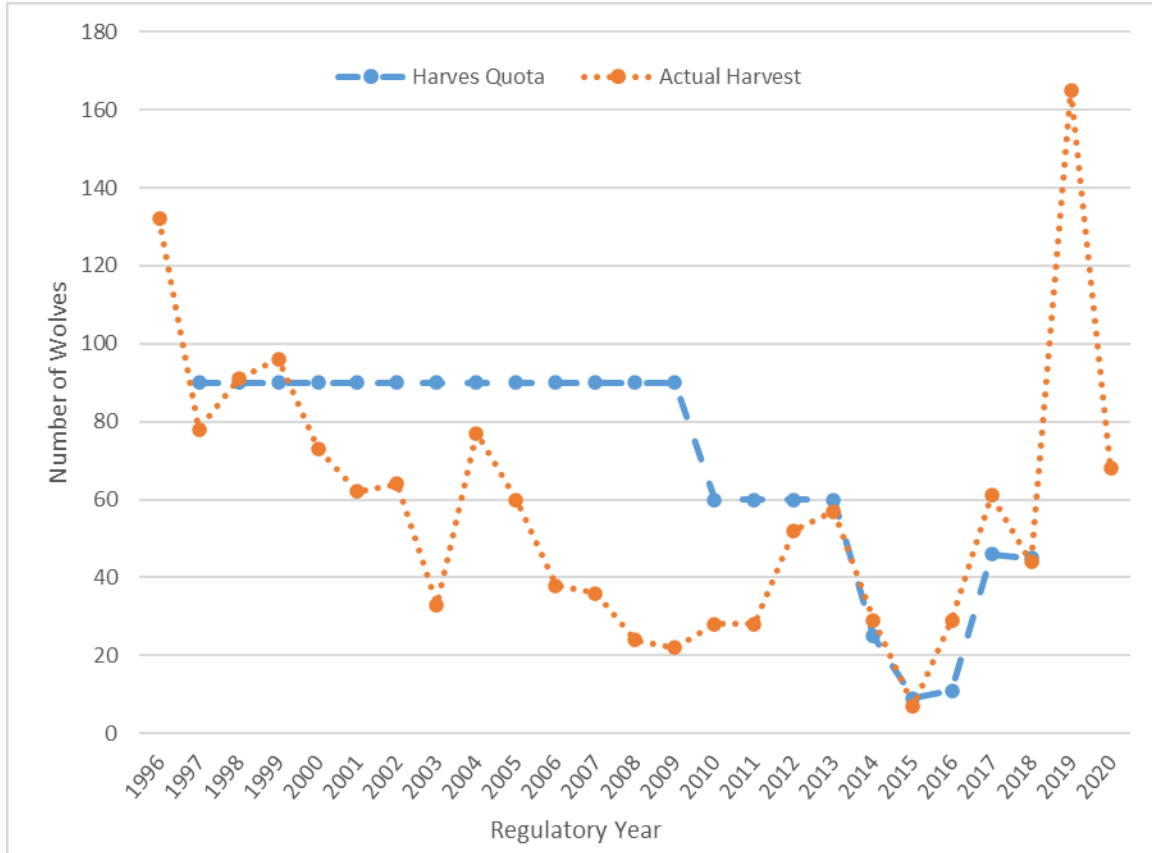
Most of the wolf harvest in Unit 2 has occurred in January and February when pelts are most prime and fur prices are highest (Porter 2018). Since 2015, most of the wolf harvest has occurred in December because seasons have closed early by emergency order (ADF&G 2019c). Little harvest occurs before December (Porter 2018, SERAC 2017). Between 1997 and 2014, 60% of wolf harvest occurred in January and February on average (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). Over the same time period, on average 3% of wolves were harvested before December. Between 2015 and 2018, 32% of wolves were harvested before December on average due to seasons closing early (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). Between 2011 and 2018, reported wolf harvest in September and October ranged from 0-6 wolves per year, averaging 0.8 wolves per year (Schumacher 2019, pers. comm. as cited in OSM 2020).

Unreported human-caused mortality includes wounding loss, illegal harvest, and vehicle collisions. As part of an ADF&G research program, Person and Russell (2008) estimated unreported human-

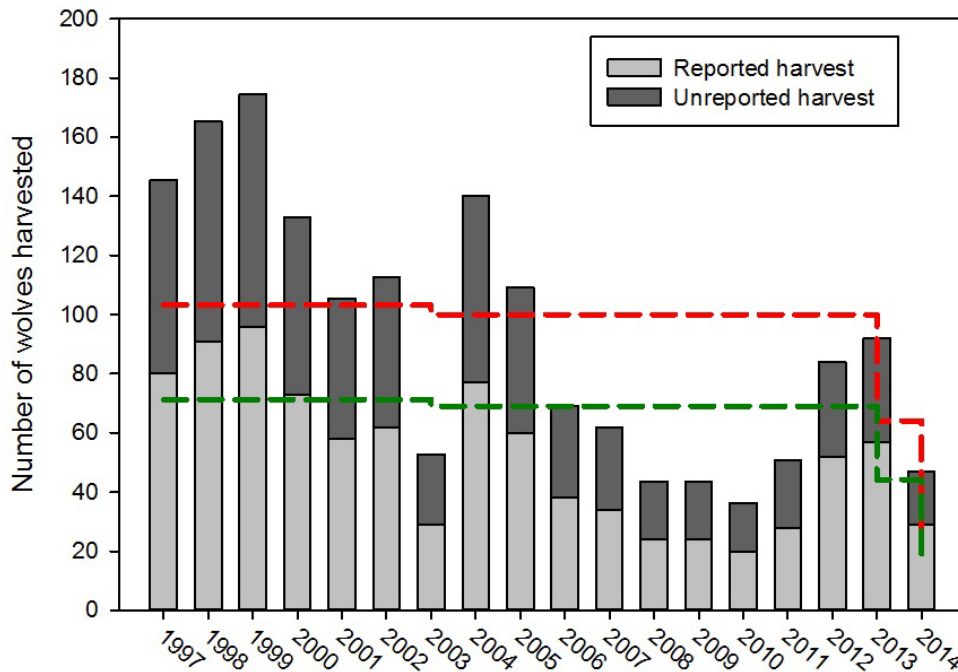
caused mortality as 47% of total human-caused mortality based on a study of 55 radio-collared wolves in which 16 of 34 human-caused wolf kills were unreported. Most of the unreported kills were either shot out of season or killed during open seasons and not reported (Person and Russell 2008). Later in the research program, ADF&G reported three of eight radio-collared wolves that died during their study were not reported, suggesting 38% of human-caused wolf kills are unreported (USFWS 2015, Schumacher 2019, pers. comm. as cited in OSM 2020). Thus, unreported harvest accounts for a substantial portion of wolf harvest in Unit 2, which likely resulted in unsustainable harvests in some years (**Figure 4**) (USFWS 2015, 2016). USFWS (2016) estimated mean total (reported and unreported) annual harvest as 29%, ranging from 11-53%, and concluded that harvest has impacted the Unit 2 wolf population. However, unreported harvests are implicitly accounted for with the new management strategy as management is based on population estimates and objectives rather than on harvest quotas and reported harvests.

USFWS (2015) notes harvest may explain most of the 2013-2014 population decline if unreported harvest is considered. Relatively easy boat and road access may contribute to high rates of unreported harvest in Unit 2, while the insularity of the population makes it more susceptible to overharvest (USFWS 2015). However, as few wolves in Unit 2 are currently radio-collared, documenting unreported human-caused mortality is difficult and accounting for it when setting harvest quotas was a contentious issue (Porter 2018). Additionally, testimony from Federally qualified subsistence users to the Council indicates high levels of illegal harvest are not occurring (SERAC 2017).

In 1999, the wolf season closed early by emergency order for the first time. Afterward, annual reported harvest declined substantially (Person and Logan 2012, Bethune 2012). Similarly, Porter (2003) notes that the number of successful trappers averaged 17 per year from 1999-2001, which was well below the 10-year average of 27 successful trappers per year. Between 2002 and 2014, the number of successful trappers averaged 12 per year (Porter 2018). The threat of early season closures likely discouraged hunters and trappers from reporting their harvests, and harvest data after 1999 may be less accurate than harvest data prior to 1999 (Person and Logan 2012).



**Figure 3.** Unit 2 reported wolf harvest and harvest quotas, 1996-2020. Harvest includes reported harvest and other documented human-caused mortality (e.g. vehicle collisions) (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, ADF&G 2020a, 2020b).



**Figure 4.** Estimated total number of wolves harvested by regulatory year in Unit 2, 1997-2014. Unreported harvest was estimated using a rate of 0.45 of total harvest from 1997-2011 (Person and Russell 2008) and a proportion of 0.38 of total harvest from 2012-2014 (ADF&G 2015a as cited in USFWS 2015). The green and red dotted line indicates 20% and 30% of the estimated population size, respectively (figure from USFWS 2015).

**Effects of the Proposal**

If adopted, this proposal would align Federal and State regulations by requiring Federally qualified subsistence users to sequentially number/mark hides, call ADF&G within 7 days of take to report the date and location of take for each wolf, and seal all hides within 15 days of take. Wolves in Unit 2 are managed cooperatively between State and Federal managers. Realigning regulations through adoption of WP22-03 would help continued effective management of wolves in Unit 2.

One of the drivers for this regulation change is the precision of population estimation. DNA from wolves for the annual SECR estimates are collected from mid-October to mid-December. A harvested wolf would represent a data point and, if the harvested wolf was previously detected at a hair board, it would represent a valuable recapture event. The requirement of sequential numbering/markings hides along with a 7-day call-in requirement will aid in minimizing lost or incorrect data and coincide with the methods used for the SECR. Having the hides sequentially numbered/markings will allow data acquired during the 7-day call-in to be correctly correlated with each individual harvested wolf’s hair (DNA) sample taken during the sealing process. The State has undergone criticism for the accuracy of wolf population estimates in Unit 2 (ADF&G 2021). In addition, a petition to list the Alexander Archipelago wolf was submitted in 2020 identifying inadequacy of existing regulatory mechanisms as a threat (Wolf et al. 2020). These proposed regulation changes would allow the management agencies to acquire the most precise data possible to aid in estimating the wolf population with more precision

and defensibility in Unit 2. The ability to incorporate harvest data into the SECR estimates will increase the effectiveness of the regulations, avoid exceeding the sustainable harvest of wolves, and help safeguard the wolves from becoming a listed species (ADF&G 2021).

Reducing the sealing timeframe would have minimal effects on Federally qualified subsistence users. From 2012 to 2020, Federally qualified subsistence users were required to seal hides within 14 days of harvest. Requiring the sequential numbering/marketing of hides and reporting the date and location of take for each wolf within 7 days may be more burdensome for Federally qualified subsistence users but should benefit them long-term by providing more accurate and precise information on when and where individual wolves were harvested for ADF&G's wolf population estimates and ultimately maximizing harvest opportunity. The new management strategy announces the season length ahead of time providing predictability rather than closing the season when harvest quotas are met. Thus, the sealing requirement should not discourage harvest reporting like it did in the past.

This proposal would not affect other users because this regulation already exists under State regulations. Both subsistence users and non-Federally qualified users may benefit from this proposal since more effective management will help ensure continued long-term availability of this resource.

## **OSM PRELIMINARY CONCLUSION**

**Support Proposal WP22-03.**

### **Justification**

The sealing requirement is shorter than the current regulation but is one day longer than the sealing requirement prior to the regulation change in 2020. The sequential numbering/marketing of hides and reporting the date and location of take for each wolf within 7 days will be more burdensome to hunters/trappers but is essential to tying in harvest data to SECR estimates. Sequentially numbering/marketing hides and reporting within 7 days will also help increase the accuracy of hunter's/trapper's records when the hides are sealed, especially if there is a delay due to weather or access to a sealer. Overall, with minimal impacts to Federally qualified subsistence users, this regulation change will allow the management agencies to more effectively estimate the population of wolves in Unit 2, avoid exceeding sustainable harvest, and help safeguard the wolves from becoming a listed species. All users should benefit long-term from more effective use of regulations to manage the wolf population in Unit 2. Effective wolf management in Unit 2 requires coordination between State and Federal agencies, and these proposed changes would realign State and Federal regulations.

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<b>WP22–04/05 Executive Summary</b>											
<b>General Description</b>	<p>Proposal WP22-04 requests the establishment of a year-round Federal elk hunt in Units 1, 2, 3, and 4, except on Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3 with a harvest limit of one elk by Federal registration permit. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council</i></p> <p>Proposal WP22-05 requests establishing a draw permit hunt for elk in the Etolin Island area of Unit 3 with one permit issued per household. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council</i></p>										
<b>Proposed Regulation</b>	<p><u>WP22-04</u></p> <p style="text-align: center;"><b>Units 1, 2, 3, and 4—Elk</b></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 80%;"><i>Unit 3, Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands</i></td> <td style="width: 20%; text-align: right;"><i>No Federal open season</i></td> </tr> <tr> <td><i>Units 1, 2, 4, and 3 remainder - 1 elk by Federal registration permit.</i></td> <td style="text-align: right;"><i>July 1- June 30</i></td> </tr> </table> <p><i>Successful hunters are required to send a photo of their elk antlers to ADF&amp;G and a 5-inch section of the lower jaw with front teeth.</i></p> <p><u>WP22-05</u></p> <p style="text-align: center;"><b>Unit 3—Elk</b></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 80%;"><i>Unit 3, Etolin Island area bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Ernest Sound, then northeast following the midline of Ernest Sound, excluding Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then southwest along the midline of Stikine Strait back to the point of beginning— 1 bull by Federal draw permit</i></td> <td style="width: 20%; text-align: right;"><i>No Federal open season</i></td> </tr> <tr> <td></td> <td style="text-align: right;"><i>Oct. 1 – Oct. 15</i></td> </tr> <tr> <td></td> <td style="text-align: right;"><i>Oct. 16 – Oct. 31</i></td> </tr> </table>	<i>Unit 3, Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands</i>	<i>No Federal open season</i>	<i>Units 1, 2, 4, and 3 remainder - 1 elk by Federal registration permit.</i>	<i>July 1- June 30</i>	<i>Unit 3, Etolin Island area bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Ernest Sound, then northeast following the midline of Ernest Sound, excluding Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then southwest along the midline of Stikine Strait back to the point of beginning— 1 bull by Federal draw permit</i>	<i>No Federal open season</i>		<i>Oct. 1 – Oct. 15</i>		<i>Oct. 16 – Oct. 31</i>
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	<i>Oct. 1 – Oct. 15</i>										
	<i>Oct. 16 – Oct. 31</i>										

<b>WP22–04/05 Executive Summary</b>	
	<p><i>There will be a drawing for each hunt period. Harvest limit is one bull elk per Federal draw permit. Only one elk permit will be issued per household. A household receiving a State draw permit for elk may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Wrangell Ranger District office, in consultation with ADF&amp;G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of elk permits. Successful hunters are required to send a photo of their elk antlers to ADF&amp;G and a 5-inch section of lower jaw with front teeth.</i></p> <p><i>Unit 3 remainder</i></p> <p style="text-align: right;"><i>No Federal open season</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b> Proposal WP22-04 and <b>Oppose</b> Proposal WP22-05.
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

**DRAFT STAFF ANALYSIS  
WP22-04/05**

**ISSUES**

Proposal WP22-04, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests the establishment of a year-round Federal elk hunt in Units 1, 2, 3, and 4, except on Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3 with a harvest limit of one elk by Federal registration permit.

Proposal WP22-05, also submitted by the Council, requests establishing a draw permit hunt for elk in the Etolin Island area of Unit 3 with one permit issued per household (**Map 1**).

**DISCUSSION**

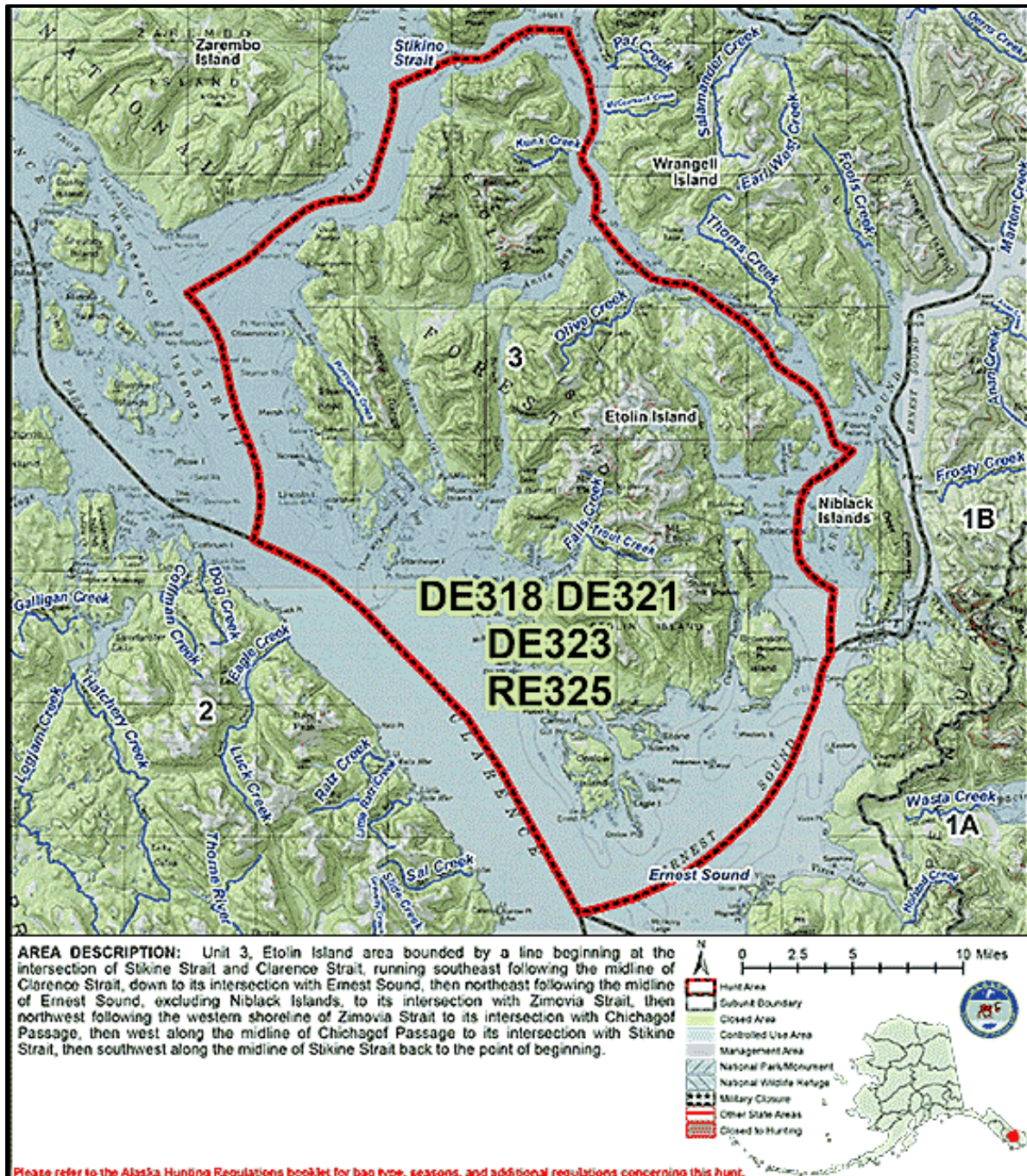
In regards to Proposal WP22-04, the proponent requests that a Federal general season be established for harvesting elk outside of the managed Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands to aid in the control of non-native elk and to provide a meaningful subsistence hunting opportunity. The proponent cites the previous State general elk season that encompassed the proposed area and was closed in November of 2018.

In regard to Proposal WP22-05, the proponent requests that a Federal draw permit hunt be established for elk in the Etolin Island area of Unit 3. The proponent stipulates that 25% (rounded up to the next whole number) of the State's annual permit quota be allocated to a Federal draw system. Federally qualified subsistence users will be limited to one permit per household. If one or more members of a household receives a State draw permit, they will be ineligible for a Federal draw permit. The proponent states this proposal would provide a meaningful subsistence priority by reducing competition with non-Federally qualified users and resulting in increased harvests by Federally qualified subsistence users. The proponent states the annual harvest quota prevents any conservation concerns.

**Existing Federal Regulation**

**Units 1, 2, 3, and 4—Elk**

*No Federal open  
season*



**Map 1.** Hunt area for Unit 3 elk permits DE318, DE321, DE323, and RE325. Map was taken from ADG&G 2020-2021 hunting regulations:

[https://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/regulations\\_complete.pdf](https://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/regulations_complete.pdf).

## Proposed Federal Regulation

### WP22-04

#### Units 1, 2, 3, and 4—Elk

*Unit 3, Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands* *No Federal open season*

*Units 1, 2, 4, and 3 remainder - 1 elk by Federal registration permit.* *July 1- June 30*

*Successful hunters are required to send a photo of their elk antlers to ADF&G and a 5-inch section of the lower jaw with front teeth.*

### WP22-05

#### Unit 3—Elk

*Unit 3, Etolin Island area bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Ernest Sound, then northeast following the midline of Ernest Sound, excluding Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then southwest along the midline of Stikine Strait back to the point of beginning— 1 bull by Federal draw permit*

*No Federal open season*

*Oct. 1 – Oct. 15*

*Oct. 16 – Oct. 31*

*There will be a drawing for each hunt period. Harvest limit is one bull elk per Federal draw permit. Only one elk permit will be issued per household. A household receiving a State draw permit for elk may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Wrangell Ranger District office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of elk permits. Successful hunters are required to send a photo of their elk antlers to ADF&G and a 5-inch section of lower jaw with front teeth.*

*Unit 3 remainder* *No Federal open season*



**Existing State Regulation**

**Units 1, 2, and 4—Elk**

*No open season*

**Unit 3—Elk**

<p><i>Residents and Nonresidents: Etolin Island area bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Ernest Sound, then northeast following the midline of Ernest Sound, excluding Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then southwest along the midline of Stikine Strait back to the point of beginning</i></p>	<p><i>1 bull by bow and arrow only by permit</i></p>	<p><i>DE318</i></p>	<p><i>Sep. 1 – Sep. 30</i></p>
	<p><i>1 bull by permit</i></p>	<p><i>DE321</i></p>	<p><i>Oct. 1 – Oct. 15</i></p>
	<p><i>1 bull by permit</i></p>	<p><i>DE323</i></p>	<p><i>Oct. 16 – Oct. 31</i></p>
	<p><i>1 bull by permit</i></p>	<p><i>RE325</i></p>	<p><i>Nov. 15 – Nov. 30</i></p>

*Residents and Nonresidents: Unit 3, Remainder*

*No open season*

**Extent of Federal Public Lands**

**Table 1.** Federal public lands in the Southeast Alaska Region, Units 1–4.

<b>Management unit</b>	<b>Percentage Federal public lands</b>	<b>Percentage of Federal public lands managed by each agency</b>
1A	91.3%	91.3% U.S. Forest Service
1B	98.1%	98.1% U.S. Forest Service
1C	95.5%	62.6% U.S. Forest Service 32.9% National Park Service <sup>a</sup>
1D	43.8%	24.9% National Park Service <sup>a</sup> 18.9% U.S. Forest Service
2	74.0%	74.0% U.S. Forest Service
3	90.6%	90.6% U.S. Forest Service
4	92.2%	92.2% U.S. Forest Service

<sup>a</sup> Glacier Bay National Park, closed to subsistence

## **Customary and Traditional Use Determinations**

Rural residents of Units 1-5 have a customary and traditional use determination for elk in Unit 3. A customary and traditional use determination has not been made for elk in Units 1, 2, and 4. Therefore, all Federally qualified subsistence users may hunt elk in these units.

## **Regulatory History**

Elk were planted on Etolin Island in Unit 3 in 1987 and stable populations became established on both Etolin and Zarembo Islands (Burris and McKnight 1973; Paul 2009). In 1996, a bull only hunt was developed for the 1997 season under State regulations with 30 bull draw permits. The following season, the State issued 70 draw permits for bull elk and a separate archery only season was established. After 6 bulls were harvested on Zarembo Island during the 2005 September- October draw hunt, an emergency order was issued to close the registration elk hunting season on Zarembo Island (Harper 2014). State managers closed Zarembo Island to elk harvest until the bull:cow ratio and total population increased. The island remains closed to elk harvest.

In 2001, in an attempt to limit the dispersal of elk outside of the managed Zarembo and Etolin Islands population, the State instituted a general elk season for Units 1, 2, and the remainder of Unit 3 (Harper 2014). The season allowed for the harvest of any elk outside of the Unit 3 managed areas from August 1 to December 31. The first elk harvested under the general elk hunt was a cow harvested on Shrubby Island in 2004. In 2005, 4 cows were harvested off Shrubby Island and another cow was later harvested from Bushy Island. In a 2012 Alaska Board of Game action, Bushy, Shrubby, and Kashevarof Islands were added to the restricted area and removed from the general elk hunt due to concerns of false reporting and illegal harvest of Zarembo Island elk. In 2018, the State issued an emergency order to discontinue the general elk hunt due to concerns that one or more of the elk harvested during the general season had been harvested illegally from Zarembo or Etolin Islands. The State was never able to verify any harvest locations of elk taken during the general season and believed that hunters were killing elk in the closed or managed areas and submitting false reports or not reporting the harvest.

A Federal elk hunt has never occurred in Units 1-4. In 2020, the Board adopted Proposal WP20-13, establishing a customary and traditional use determination for elk in Unit 3 for rural residents of Units 1-5.

## **Biological Background**

An interagency taskforce was assembled in 1984 to evaluate Etolin, Zarembo, Prince of Wales, and Kuiu Islands for the feasibility of establishing an elk herd (ADF&G 1984, 1986). Both Etolin and Zarembo Islands were found to provide adequate winter and summer habitat and browse for elk. Etolin Island was chosen for its low probability of poaching due to remoteness, lack of snowfall in key areas, size, predator to prey ratio, and low probability of elk spreading to a wilderness (although South Etolin Island later became a wilderness)(USDA Forest Service 1986).

Elk (*Cervus elaphus*) were unsuccessfully transplanted to Southeast Alaska six times prior to 1987 (Burriss and McKnight 1973; Paul 2009). In 1985, Alaska passed legislation requiring the introduction of 50 elk to Etolin Island to provide hunting opportunity. In the spring of 1987, 33 Roosevelt (*C. e. roosevelti*) and 17 Rocky Mountain (*C. e. nelson*) elk were transplanted to Etolin Island (Harper 2014). Within the first 18 months, roughly two-thirds of the elk were lost due to various causes of mortality. However, a breeding population was established and spread to Zarembo Island. The original Etolin Island elk management goal was to maintain 250 elk with a harvest of 20 bulls. The current management goals are to 1) Provide a hunt opportunity 2) Maintain Etolin and Zarembo Island elk herds below the carrying capacity 3) Limit the dispersal of elk to other islands and 4) Maintain an annual post-harvest ratio of 25-30 bulls:100 cows.

The most recent published State aerial survey of southern Etolin Island was on 15 August 2010 and counted 91 elk in 1 herd which was made up of 13 bulls, 59 cows, and 19 calves (Harper 2014). The bull:cow ratio was 22 bulls:100 cows and the calf:cow ratio was 32 calves:100 cows. Collared elk on Etolin Island have been used to determine winter and summer range, calving and rutting areas, important habitat, and to locate elk for minimum population estimates and composition counts. Population estimates of elk in Unit 3 are difficult due to dense brush and remote habitat.

After the elk populations on Etolin and Zarembo were established, concerns developed about the spread of elk throughout Southeast Alaska. Unverified sightings of elk on neighboring islands and documentation of a radio collared elk on Farm Island at the mouth of the Stikine River, led to the State general elk season from 2001-2018 (Paul 2009). The degree of competition between elk and deer in Southeast Alaska is unknown, but the potential exists for elk to compete with Sitka black-tailed deer both directly through physical displacement or indirectly through competition for resources or through changes to the predator prey dynamics (Harper 2014). A study by Kirchhoff and Larsen (1998) showed that the high degree in dietary overlap between elk and deer has the potential to result in competition for valuable browse (Kirchhoff and Larsen 1998).

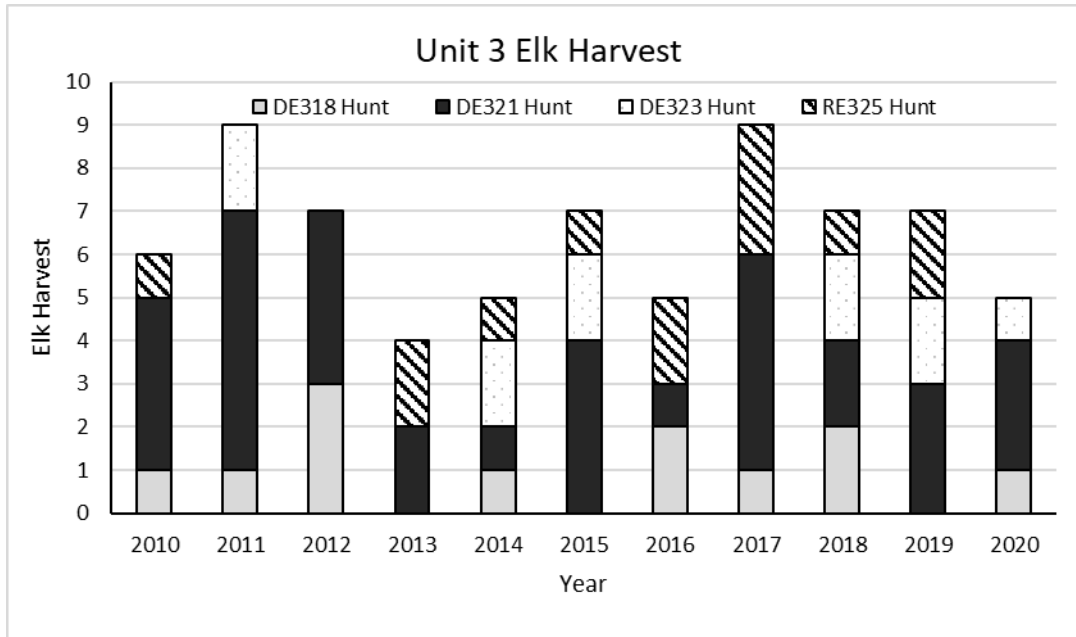
### Harvest History

The State of Alaska issued an average of 181 Unit 3 Etolin Island elk permits per year from 2010 to 2020 (**Table 1**). On average, roughly 40% of permit holders hunted for elk and had a success rate of 8%. During that period, 71 elk were harvested through the State draw DE318 archery (17%), DE321 (49%), DE323 (15%) and registration RE325 (18%) hunts (**Figure 2**). Harvest in those hunts were primarily by Federally qualified residents of Units 1-5 (58%) followed by non-Federally qualified residents of Units 1-5 (Ketchikan, Juneau, Douglas; 35%) (**Table 3**). Alaska residents from the remainder of the state and non-residents made up four percent and one percent of Unit 3 elk harvest, respectively. From 2010 to 2020 Federally qualified residents of Units 1-5 received 46% (925 permits) of the Unit 3 elk permits (**Table 4**). However, only 48% (446 permits) of those permit holders attempted to harvest elk. In general, less than ten percent of draw applicants receive a permit. In 2020, 6 percent of the 2,015 draw applicants received a permit (ADF&G 2021). Harvesters who do not draw a permit have the option to receive a State registration permit for Unit 3 elk from Nov. 15 – Nov. 30 unless closed by the State.

The Unit 3 general elk hunt was available from 2001 to 2018 and allowed for the harvest of any elk outside of the Unit 3 elk management area (Etolin and Zarembo Islands). The first elk harvested under the general elk hunt was a cow harvested in 2004. In 2005, 5 more cows were harvested during the general season. No elk harvest was reported during the Units 1-3 general elk season between 2010 and the emergency closure in 2018. With no reported harvest and limited anecdotal reports of sightings on neighboring islands, the season was closed by the State. The State was not able to verify the harvest locations of elk taken under the general permit and cited concerns over the use of the permit to poach elk from Etolin and Zarembo Islands in the 2018 closure notice.

**Table 2.** Permits issued, permits hunted, and elk harvested from 2010-2020 in Unit 3. Data provided by ADF&G permit harvest records (Robbins 2021, pers. comm.).

<b>Year</b>	<b>Permits Issued</b>	<b>Permits Hunted</b>	<b>Elk Harvest</b>
2010	180	51	6
2011	174	58	9
2012	173	72	7
2013	187	77	4
2014	184	76	5
2015	185	57	7
2016	196	73	5
2017	174	80	9
2018	189	86	7
2019	182	85	7
2020	166	73	5
<b>Total</b>	<b>1990</b>	<b>788</b>	<b>71</b>
<b>Average</b>	<b>181</b>	<b>72</b>	<b>6</b>



**Figure 1.** Unit 3 elk harvest by hunt permit DE318 Archery (Sep. 1-Sep. 30), DE321 (Oct. 1-Oct. 15), DE323 (Oct. 16-Oct. 31), and RE325 (Nov. 15-Nov. 30) from 2010-2020. Three additional bull elk were harvested between 2010-2020 through ADF&G's auction permit program. No elk were harvested during the Unit 1-3 general season hunt between 2010 and the emergency closure in 2018. Data provided by ADF&G permit harvest records (Robbins 2021, pers. comm.).

**Table 3.** Unit 3 total elk harvest by community and residency for DE318 Archery (Sep. 1-Sep. 30), DE321 (Oct. 1-Oct. 15), DE323 (Oct. 16-Oct. 31), and RE325 (Nov. 15-Nov. 30) from 2010-2020. Table includes percent total harvest by community from 2010-2020. Data provided by ADF&G permit harvest records (Robbins 2021, pers. comm.).

Residency	Community	Elk Harvest	Percent
Federally Qualified Resident Units 1-5	Coffman Cove	1	1%
	Craig	9	13%
	Edna Bay	3	4%
	Hollis	1	1%
	Klawock	6	8%
	Naukati Bay	1	1%
	Petersburg	4	6%
	Sitka	2	3%
	Thorne Bay	1	1%
	Wrangell	13	18%
	<b>Total</b>	<b>41</b>	<b>58%</b>
Non-Federally Qualified Resident Unit 1-5	Douglas	1	1%
	Juneau	6	8%
	Ketchikan	18	25%
	<b>Total</b>	<b>25</b>	<b>35%</b>

Residency	Community	Elk Harvest	Percent
Non-Resident	Nonresident	1	1%
	<b>Total</b>	<b>1</b>	<b>1%</b>
Other Alaska Residents	Anchorage	1	1%
	Homer	1	1%
	Sterling	1	1%
	Tok	1	1%
	<b>Total</b>	<b>4</b>	<b>4%</b>

**Table 4.** Unit 3 elk harvest by Federally qualified subsistence users from 2010-2020 by community. Harvest was during for DE318 Archery (Sep. 1-Sep. 30), DE321 (Oct. 1-Oct. 15), DE323 (Oct. 16-Oct. 31), and RE325 (Nov. 15-Nov. 30). Data provided by ADF&G permit harvest records (Robbins 2021, pers. Comm.).

Community	Permits Issued	Permits Hunted	Elk Harvested
Coffman Cove	62	29	1
Craig	131	59	9
Edna Bay	6	4	3
Elfin Cove	2	0	0
Gustavus	2	2	0
Haines	18	4	0
Hollis	2	1	1
Hoonah	9	1	0
Hydaburg	1	1	0
Kake	2	2	0
Kasaan	2	0	0
Klawock	29	14	6
Metlakatla	8	3	0
Meyers Chuck	11	7	0
Naukati Bay	3	1	1
Pelican	3	0	0
Petersburg	122	62	4
Sitka	44	19	2
Tenakee Springs	3	2	0
Thorne Bay	76	32	1
Ward Cove	67	29	0
Whale Pass	2	0	0
Wrangell	320	174	13
<b>Total</b>	<b>925</b>	<b>446</b>	<b>41</b>

## **Other Alternatives Considered**

One considered alternative to Proposal WP22-05 was to establish a Federal season within the management area of Unit 3 with a harvest limit of one bull elk by Federal registration permit. A Federal registration permit hunt would preclude the allocation issue of draw permits as proposed by WP22-05. Considering only six elk are harvested each year on average out of 181 permits issued, the elk population can likely withstand some increase in harvest. Additionally, since only 48% of Federally qualified draw permit holders actually hunt and only account for about half of the elk harvest in Unit 3 each year, harvest within the management area by a Federal registration permit hunt is expected to be very low, but would provide a meaningful subsistence priority and opportunity. Furthermore, authority to close the season when a certain number of elk were reported by Federal permit could be delegated to a Federal in-season manager to further mitigate any conservation concerns associated with overharvest.

## **Effects of the Proposal**

### WP22-04

The proposed regulation would allow Federally qualified users to harvest one elk by Federal registration permit from Units 1, 2, 4, and the remainder of Unit 3. The proposed harvest would provide additional subsistence opportunity for residents of Units 1-5 in Unit 3 and for all Federally qualified subsistence users in Units 1, 2, and 4. However, sightings of elk on islands other than Etolin and Zarembo have been rare and anecdotal, suggesting that harvest opportunity would be very limited. The State management goals for elk in Unit 3 include limiting the dispersal of elk to islands other than Etolin and Zarembo. A general elk season may help limit the spread of elk to islands in the area while providing subsistence opportunity.

Elk in Southeast Alaska may compete with deer and alter predator prey interactions. A general elk season would be a helpful management tool if a population of elk were to colonize neighboring islands. There are no known conservation concerns associated with a general elk season due to the State's desire to limit elk populations to a specific management area (Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands) and because elk are a non-native species in these units. However, the populations of elk within the management area may be negatively affected if general elk permits are used to illegally harvest from these populations, as suspected during the State general season.

Enforcement of a general elk season would be difficult as the elk management area and the general season harvest area are both large and difficult to patrol. Law enforcement was unable to verify the site of any elk harvested under the State's general elk season and would likely have the same difficulties with the proposed Federal general elk season.

Adoption of Proposal WP22-04 would also increase regulatory complexity and user confusion by misaligning State and Federal regulations. Federally qualified subsistence users would need to distinguish

between Federal and non-Federal lands when hunting elk in these units to ensure the elk are legally harvested on Federal public lands.

The proposal also requires successful hunters to send a photo of their elk antlers and section of the lower jaw to ADF&G. However, this requirement under Federal regulations needs approval from the Office of Management and Budget and cannot be authorized solely by the Board through adoption of a wildlife proposal.

#### WP22-05

The proposed regulation would allocate 25 percent of the Unit 3 State elk draw permits to a Federal subsistence draw permit hunt. The Federal elk draw hunt could increase the participation of Federal harvesters in the Unit 3 elk harvest. However, between 2010 and 2020, 46 percent of elk permits were received by Federally qualified residents. During that same period approximately 52 percent of Federally qualified permit holders did not participate in the hunt, suggesting that there is a surplus of permits issued to Federally qualified residents each year. Due to the low success rate, remoteness, and rough terrain of the harvest area, participation in the Federal draw hunt would likely be similar to the State draw hunts. Additionally, Federal draw permit holders could only hunt on Federal public lands and would need to distinguish between Federal and non-Federal managed lands.

Section 815 of ANILCA provides that the Board may restrict non-subsistence uses on Federal public lands if “necessary for the conservation of healthy populations of fish and wildlife” or “to continue subsistence uses of such populations.” 50 CFR 100.4; 36 CFR 242.4 . The residents of Ketchikan have historically received the largest single proportion (25%) of Unit 3 elk permits. The allocation of Federal permits would negatively impact non-Federally qualified users.

The Federal draw hunt would not increase the number of Unit 3 elk draw permits issued and would not likely increase the number of elk harvested under draw permits. However, the proposal, as written, would allow a Federal harvester to receive a Federal draw permit and a State registration permit which may increase harvest opportunity. State regulations currently prohibit anyone from receiving two Unit 3 elk permits in one year.

The proposal restricts any household from receiving more than one Unit 3 Federal elk permit or using both a State draw and Federal draw permit for the same year. Enforcing the permit restrictions would be difficult and may require a permit holder to list all members of their household to be shared with both State and Federal managers. There is currently no system for ensuring that harvesters do not obtain both State and Federal permits for the same year. Additionally, Federal regulations cannot prohibit participation by an individual in a State hunt, so this requirement is not legal.



## OSM PRELIMINARY CONCLUSION

**Support** Proposal WP22-04 and **Oppose** Proposal WP22-05.

### Justification

#### WP22-04

There is no conservation concern for elk outside of the Unit 3 elk management area. A Federal general elk season may provide limited subsistence opportunity to residents of the area while helping to manage the spread of elk.

#### WP22-05

Federally qualified users harvest an average of 58 percent of Unit 3 elk. Roughly 52 percent of the permits issued to Federally qualified residents in the past 11 years were not used, likely due to the low success rate, remoteness, and difficult terrain of the hunt. Hunters who do not draw a permit have the option to receive a State registration permit for Unit 3 elk from Nov. 15 – Nov. 30 unless closed by the State. The large percentage of unused permits by both Federally qualified and non-Federally qualified users, and the availability of a State registration permit suggest that the restriction of non-Federally qualified users is not necessary to continue subsistence uses of the Unit 3 elk population. Enforcement of the Federal draw permit's household restriction would be difficult for both State and Federal managers since it may require sharing permit holder information, while prohibiting participation in the State hunt is not legal.

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<b>WP22-06 Executive Summary</b>	
<b>General Description</b>	Proposal WP22-06 requests the establishment of a Federal draw permit moose hunt with an any-bull harvest limit and a harvest quota of 20 bulls on Kupreanof and Kuiu Islands in Unit 3. <i>Submitted by: the Southeast Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Unit 3—Moose</b></p> <p><i>1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on either antler, or antlers with 2 brow tines on both sides by State registration permit only. <b>On Kupreanof and Kuiu Islands up to 20 bull moose may be taken by Federal draw permit.</b></i></p> <p><i>Sept. 15 – Oct. 15</i></p> <p><i>Harvest limit is one bull moose per Federal draw permit. Only one bull moose permit will be issued per household. Recipients of a Federal draw permit are not eligible for a State permit. The annual harvest quota will be announced by the USDA Forest Service, Petersburg Ranger District office, in consultation with ADF&amp;G. Successful hunters are required to send a photo of their moose antlers to ADF&amp;G and a 5-inch section of lower jaw with front teeth.</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

## DRAFT STAFF ANALYSIS WP22-06

### ISSUES

Proposal WP22-06, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests the establishment of a Federal draw permit moose hunt with an any-bull harvest limit and a harvest quota of 20 bulls on Kupreanof and Kuiu Islands in Unit 3.

### DISCUSSION

The proponent requests that a Federal draw hunt be established for the taking of up to 20 bull moose from Kupreanof and Kuiu Islands in Unit 3. The current Unit 3 moose hunt allows for the taking of 1 bull moose with spike, fork, greater than 50-inch spread, three or more brow tines on either antler, or 2 brow tines on both antlers by State registration permit. The proposed Federal draw hunt would allow a permit holder (1 per household) to harvest 1 bull moose on Kupreanof or Kuiu Islands without antler restrictions. The proponent states that it is becoming more challenging for Federally qualified subsistence harvesters users to harvest a sufficient number of moose under the State's antler restriction hunt and that a Federal draw permit hunt, allowing the harvest of any bull, would provide additional subsistence opportunities.

#### Existing Federal Regulation

##### Unit 3—Moose

*1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on either antler, or antlers with 2 brow tines on both sides by State registration permit only.*

*Sept. 15-Oct. 15*

#### Proposed Federal Regulation

##### Unit 3—Moose

*1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on either antler, or antlers with 2 brow tines on both sides by State registration permit only. **On Kupreanof and Kuiu Islands up to 20 bull moose may be taken by Federal draw permit.***

*Sept. 15 – Oct. 15*

***Harvest limit is one bull moose per Federal draw permit. Only one bull moose permit will be issued per household. Recipients of a Federal draw permit are not eligible for a State permit. The annual***

**Unit 3—Moose**

*harvest quota will be announced by the USDA Forest Service, Petersburg Ranger District office, in consultation with ADF&G. Successful hunters are required to send a photo of their moose antlers to ADF&G and a 5-inch section of lower jaw with front teeth.*

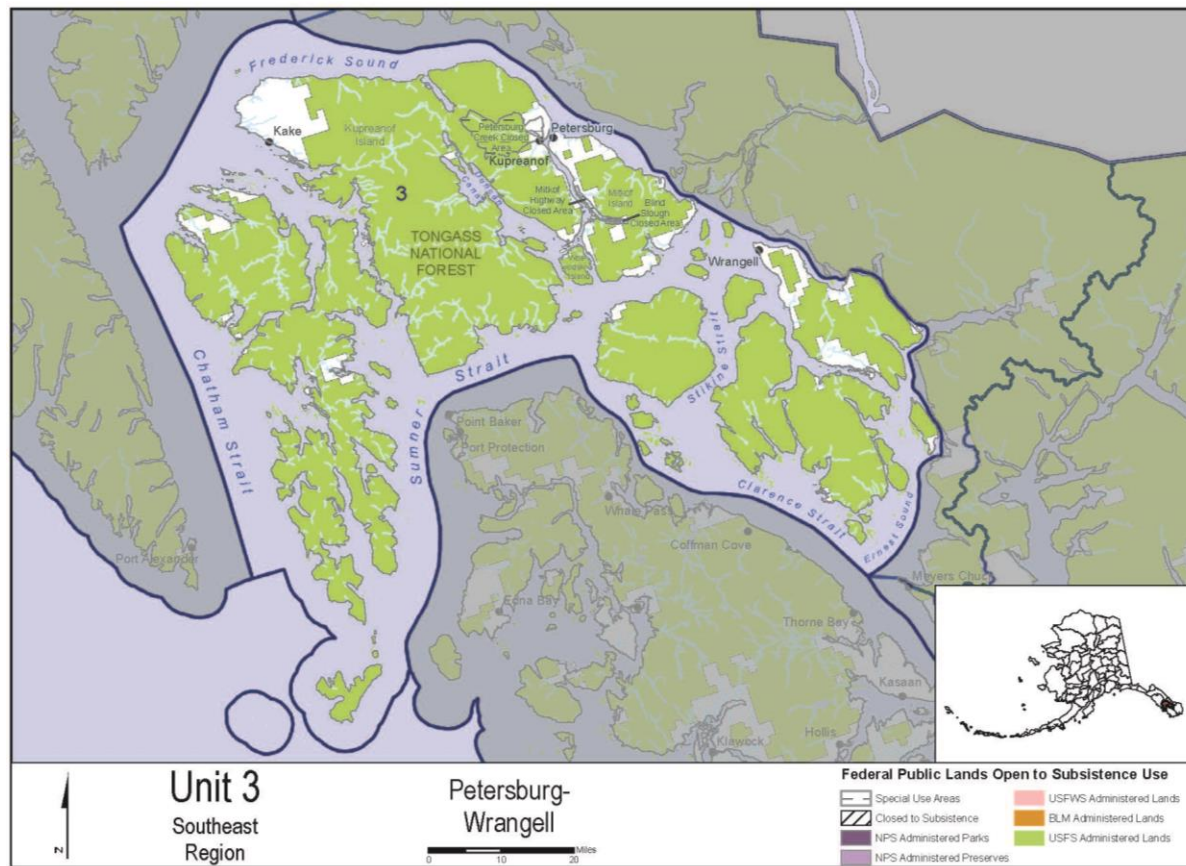
**Existing State Regulation****Unit 3—Moose**

*One bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on at least one side, or 2 brow tines on both sides, by permit (RM038).*

*Sep. 15 – Oct. 15*

**Extent of Federal Public Lands/Waters**

Federal public lands comprise approximately 90% of Game Management Unit 3 (**Map 1**) and consist of 90% U.S. Forest Service (USFS) managed lands as part of the Tongass National Forest.



**Map 1.** Unit 3 from the 2020-2022 Federal harvest regulations booklet.

### Customary and Traditional Use Determinations

Rural residents of Units 1-5 have a customary and traditional use determination for Moose in Unit 3.

### Regulatory History

Moose (*Alces alces*) began colonizing Unit 3 in the 1940’s and 1950’s from the Stikine River and possibly Thomas Bay (Dinneford 1988; Lowell 2018). After initial colonization, increased sightings indicated an expanding moose population in Unit 3. In 1960, a State moose season was established in Unit 3 allowing the harvest of 1 bull moose from 15 September to 15 October (**Appendix 1**). Numbers began decreasing, which led to a season closure in 1968.

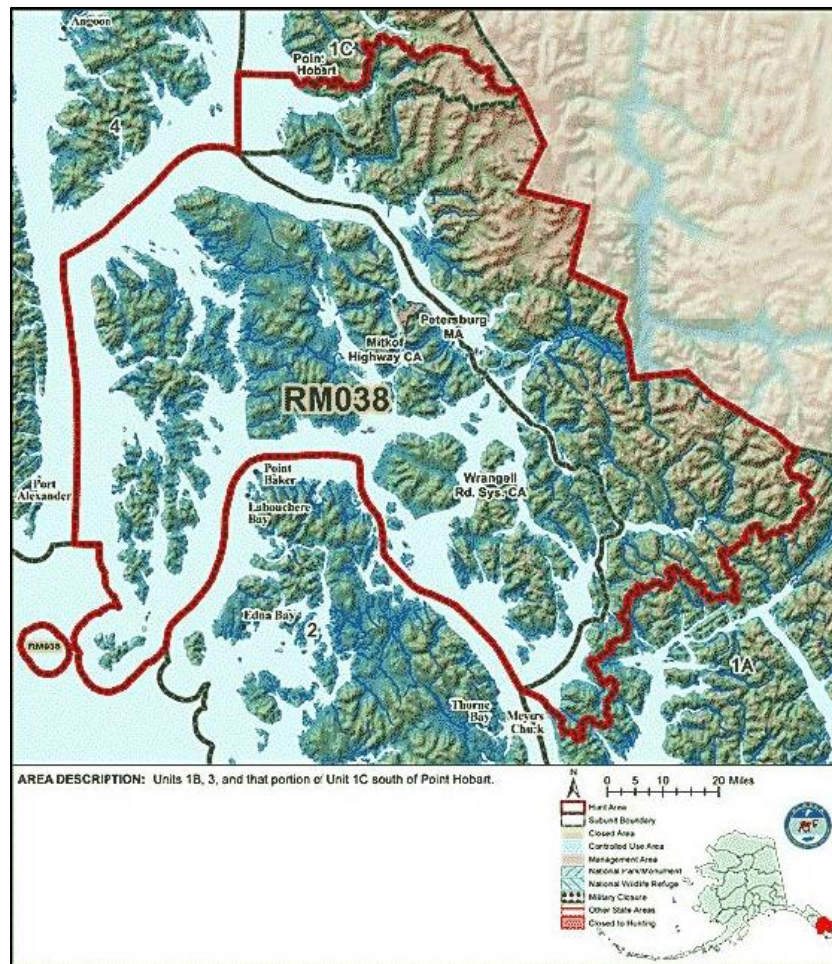
Dense brush, remote habitat and wide dispersal of moose in Unit 3 hinders aerial population estimates. After the closure of Unit 3, moose from 1968-1989 and as a result of the difficulty in acquiring population estimates, the State instated antler restrictions to maximize hunter participation while protecting the breeding population of moose and maintaining stable populations.

The State moose season was re-opened on Wrangell Island in 1990 from 1-15 October with a spike-fork-50 antler restriction. The Federal Subsistence Board (Board) adopted the existing State regulations when the Federal subsistence program was initiated in 1990. In 1991, the State moose season was

extended to Mitkof and Woewodski Islands from 1-15 October. The State extended the moose season in 1993 to the remainder of Unit 3 with a spike-fork-50 or 3 brow tines on one side restriction.

In 1995, the Alaska Board of Game (BOG) consolidated the moose seasons for Units 1B, 3, and the portion of 1C south of Point Hobart into the RM038 registration permit (**Map 2**). In 1996, the Board changed the Federal season length on Mitkof and Wrangell Islands to match the changes made by the State in 1995. From 1995-2009 the RM038 permit allowed for 1 bull moose with a spike-fork-50 or 3 brow tines on one side antler restriction from 15 September to 15 October. The Unit 3 customary and traditional use designation for moose was changed by the Board in 1997 to include residents of 1B, 3, and 3. In 1998, the Board consolidated the Federal moose hunt in Units 1B, 3, and 1C south of Point Hobart to match State regulations.

Limited any-bull draw permits were offered from 2005-2008 to gather age information from bulls previously restricted by the State antler restrictions. Information gathered from the any-bull harvest provided the State with enough information to add bulls with 2 brow tines on both antlers to the RM038 permits beginning in 2009. The current RM038 permit restriction, spike-fork-50, 3 or more tines on one antler, or 2 brow tines on both antlers, and a 1-month long season provides the greatest sustainable harvest opportunity without the ability to estimate population size (Lowell 2018). The current Federal regulations were put in place by the Board in 2009 to match the State regulations for Units 1B, 3, and 1C south of Point Hobart.



**Map 2.** RM038 moose registration permit area as defined by ADF&G 2020-2021 hunting regulations (ADF&G 2021a).

In 2010, Proposal WP10-09 was submitted by the Council to provide Federal draw permit hunts for Units 1B, 1C, and 3 (FWS 2010a). The proposal requested five permits for both Units 1B, 1C, and five additional permits for Unit 3 with a harvest limit of bull moose of any size. The proposal was opposed by the Council citing potential conservation concerns that may result in reduced harvest opportunity for local hunters. The proposal was opposed by the State and rejected by the Board. In the same year, the Board adopted proposal WP10-10 which allowed for the harvest of moose with two brow tines on each antler (FWS 2010b). The adoption of WP10-10 aligned the State and Federal moose antler restrictions for the RM038 permit, which includes Units 1B, 3, and a small portion of 1C.

On June 24, 2020, the Board approved an emergency special action request WSA19-14, which requested an emergency moose and deer season for the community of Kake in Unit 3. The Board approved an up to 60 day season during summer 2020 for the community of Kake, with a community harvest limit of up to 4 bull moose and up to 10 male Sitka black-tailed deer. The Board supported this emergency season for reasons of public safety related to food security concerns in Kake due to intermittent and unreliable food deliveries. The Petersburg District Ranger administered the hunt,



issuing a community permit to the Organized Village of Kake in response to COVID-19 food security issues. The community permit allowed for the harvest of 2 bull moose on Kupreanof Island, that portion west of the Portage Bay-Duncan Canal Portage. The Organized Village of Kake successfully harvested 2 bull moose during the permit period.

### **Biological Background**

Moose typically inhabit disturbed, subclimax habitat characterized by pioneer species such as willow (*Salix spp.*) and cottonwood (*Populus spp.*) (Dinneford 1988). In Southeast Alaska, riparian, subalpine, and post-glacial areas often provide suitable moose habitat. Unit 3 lacks any major river or recent post glacial habitat. However, timber harvest in the unit replicates natural disturbance creating subclimax habitat and browse. Previous timber harvest activities created new moose habitat that likely aided the natural emigration of moose to Unit 3 from the Stikine River corridor and possibly the Thomas Bay portion of the Alaska mainland in the 1940's and 1950's (Lowell 2018).

Due to the dense vegetation and remote nature of moose habitat in Southeast Alaska, aerial moose surveys do not provide accurate estimates of population. Therefore, little is known about the population dynamics and mortality of moose in Unit 3. However, based on anecdotal sightings and harvest reports, the State believes that Unit 3 has a low to moderate moose population that is expanding (Lowell 2018). The apparent reliance of moose on recent timber harvest in Unit 3 leads to uncertainty in the long-term stability of the expanding population. Clearcuts provide productive habitat for the first 20-25 years of the 100-150-year commercial timber harvest rotation (Lowell 2018). After the initial 20-25 years, clearcuts will enter the stem exclusion stage reducing browse for moose and deer. Although timber harvest is ongoing in the area, it's continuing at a reduced rate compared to the mid-20<sup>th</sup> century. Timber thinning treatments may be necessary to maintain adequate browse between commercial harvest.

In addition to reduction in habitat and browse, moose may compete with Sitka black-tailed deer for winter browse during harsh winters and in clearcuts that have reached the stem exclusion stage. Unit 3 is widely inhabited by black bears (*Ursus americanus*), and wolves (*Canis lupus*), with few brown bears (*Ursus arctos*). The level of predation of moose in Southeast Alaska is unknown; however, it's thought to contribute to a reduction in overall recruitment of moose (Lowell 2014). In Southcentral Alaska, a study by Ballard et al. (1991) showed that predation accounted for 83% of neonate calf mortality. However, 73% of the mortality was attributed to brown bears which are not as prevalent in Unit 3.

### Recent Population Indices

Dense vegetation prevents biologists from directly counting moose in Unit 3, so ADF&G harvest reports are the primary source of available population information. Moose harvested in the State RM038 hunt are aged at the local ADF&G office to provide age structure and antler size information. Moose sightings are reported on State harvest reports, but only provide anecdotal information with limited statistical power.

## Harvest History

Harvest data reported below were provided by ADF&G and summarized by the State moose management report and plan (Lowell 2018). Moose harvest reported on State permits in Unit 3 has steadily increased since 2010 and has been at or above the 11-year average (67 moose) for the last 6 years (**Table 1**). Federal designated hunter regulations allow a Federally qualified subsistence user to hunt for another Federally qualified subsistence user (recipient) who also qualifies for that hunt. Harvest under Federal designated hunter permits accounted for between 0 and 5 percent of the total moose harvest in Unit 3 from 2010 to 2020 (**Table 1**). The number of designated hunter permits issued in Unit 3 varies but has remained between 1 and 6 per year since 2010.

Although the State permit is open to both residents and non-residents of Alaska, between 2010 and 2020, the majority of reported hunters (81%) and successful harvesters (75%) are local residents of Unit 3 from Kake, Petersburg, and Wrangell (**Table 2; Table 3**). Non-local residents of Alaska, comprised of both Federally and non-Federally qualified users, made up 17% of the reported hunters and 22% of the harvest. Non-residents only accounted for two percent of reported hunters and three percent of moose harvest in Unit 3. Harvest effort and success rate are both steadily increasing in Unit 3 as seen by the number of permits issued, total harvest, and percent success (**Table 2**).

Timber and other road construction (Kake access road) creates greater access to previously inaccessible populations of moose in Unit 3. Increased access can lower the competition and hunting pressure on traditional moose hunting areas while increasing competition for new hunting areas and potentially reducing source populations of moose. Mitkof, Wrangell, and Kupreanof Islands have communities with airport and ferry access and extensive road systems (**Map 1**) that create easy access for resident and non-resident hunters and likely impacts the moose populations near these communities. Between 2010 and 2014 the majority of moose harvested in Unit 3 were accessed using a highway vehicle (58 %) (Lowell 2018). Other forms of access reported by the State included boats (31%), ATV (7%), and airplanes (4%).

**Table 1.** Summary of moose harvested by State Registration Permit (RM038) and Federal designated hunter permits (Federal Harvest) in Unit 3, 2010-2020 (ADF&G 2021b and 2021c; Lowell 2018; USFWS 2020).

Year	M	F	Total	Illegal	Total	Federal Designated Harvest	% Federal Harvest	Total Federal Permits
2010 <sup>b</sup>	50	0	50	3	53	0	0%	1
2011	49	0	49	7	56	0	0%	1
2012	33	0	33	3	36	1	3%	1
2013	47	0	47	8	55	1	2%	1
2014	50	0	50	7	57	3	5%	6
2015	58	0	59	9	67	3	5%	6
2016	70	1	71	6	78	1	1%	3
2017	64	0	64	11	75	0	0%	0
2018	71	0	71	6	77	0	0%	2
2019	80	0	80	10	90	1	1%	1
2020 <sup>c</sup>	88	0	88	5	93	2	2%	3
<b>Avg.</b>	<b>60</b>	<b>0</b>	<b>60</b>	<b>7</b>	<b>67</b>	<b>1</b>	<b>2%</b>	<b>2</b>

<sup>a</sup> A regulatory year begins 1 July and ends 30 June, e.g., regulatory year 2010 = 1 July 2010–30 June 2011.

<sup>b</sup> Includes one DLP (defense of life or property).

<sup>c</sup> Two additional bulls were harvested by Kake residents under an emergency Federal hunt.

**Table 2.** Residency of successful Unit 3 moose hunters, regulatory years 2010 through 2020 (ADF&G 2021b, 2021c, and 2021d; Lowell 2014 and 2018; Robbins 2021, pers. comm.).

Year <sup>a</sup>	Local <sup>b</sup> resident	(%)	Nonlocal resident	(%)	Non-resident	(%)	Total Harvest	Percent Success	Total hunters
2010	40	75%	12	23%	1	2%	53	11%	497
2011	43	77%	12	21%	1	2%	56	11%	490
2012	26	72%	8	22%	2	6%	36	8%	470
2013	41	75%	12	22%	2	4%	55	11%	484
2014	45	79%	10	18%	2	4%	57	12%	459
2015	56	84%	10	15%	1	1%	67	13%	500
2016	60	77%	16	21%	2	3%	78	14%	549
2017	55	73%	16	21%	4	5%	75	14%	537
2018	54	70%	21	27%	2	3%	77	14%	527
2019	61	68%	25	28%	4	4%	90	17%	532
2020	70	75%	22	24%	1	1%	93	17%	547
<b>Avg.</b>	<b>50</b>	<b>75%</b>	<b>15</b>	<b>22%</b>	<b>2</b>	<b>3%</b>	<b>67</b>	<b>13%</b>	<b>508</b>

<sup>a</sup> A regulatory year begins 1 July and ends 30 June, e.g., regulatory year 2010 = 1 July 2010–30 June 2011

<sup>b</sup> Residents of Kake, Petersburg, and Wrangell.

**Table 3.** Residency of all Unit 3 moose hunters, regulatory years 2010 through 2020 (ADF&G 2021b, 2021c, and 2121d; Lowell 2014 and 2018; Robbins 2021, pers. comm.)

Year <sup>a</sup>	Local <sup>b</sup> resident	(%)	Nonlocal resident	(%)	Non- Resident	(%)	Total hunters
2010	424	85%	71	14%	2	0%	497
2011	410	84%	70	14%	10	2%	490
2012	390	83%	67	14%	13	3%	470
2013	391	81%	83	17%	10	2%	484
2014	376	82%	74	16%	9	2%	459
2015	411	82%	82	16%	7	1%	500
2016	458	83%	80	15%	11	2%	549
2017	409	76%	113	21%	15	3%	537
2018	417	79%	105	20%	5	1%	527
2019	408	77%	110	21%	14	3%	532
2020	420	77%	121	22%	6	1%	547
<b>Avg.</b>	<b>410</b>	<b>81%</b>	<b>89</b>	<b>17%</b>	<b>9</b>	<b>2%</b>	<b>508</b>

<sup>a</sup> A regulatory year begins 1 July and ends 30 June, e.g., regulatory year 2010 = 1 July 2010–30 June 2011

<sup>b</sup> Residents of Kake, Petersburg, and Wrangell.

### Other Alternative Considered

A season extension was considered to provide additional harvest opportunity for Federally qualified subsistence users. However, the month-long State moose season is among the most liberal in the Southeast Alaska and encompasses the rutting (breeding) season when moose harvest is generally highest. Increasing the moose season length in Unit 3 may alleviate competition during the State season, but 81% of permits are issued to Federally qualified residents of the local communities of Kake, Petersburg, and Wrangell on average. Therefore, very little competition would be eliminated by extending the season for Federally qualified subsistence user.

Another alternative considered was to delegate authority to the Petersburg District Ranger to announce a season and to establish the harvest quota and number of draw permits to be issued each year in consultation with ADF&G and Chair of the Council. While an additional 20 bull moose harvested each year may cause conservation concerns for the Unit 3 moose population, annual flexibility in the quota and season would provide increased subsistence opportunity, while minimizing conservation concerns. As demand for moose in Unit 3 exceeds supply, this alternative could also provide a subsistence priority as mandated by Title VIII of ANILCA. The Council may want to further consider this alternative. In 2010, the Council opposed a proposal that included the harvest of five any bull moose from Unit 3 due to conservation concerns and reduced harvest opportunity. A draw for fewer any bull moose may not constitute a meaningful subsistence opportunity.

### Effects of the Proposal

Section 802 of ANILCA requires the conservation of healthy wildlife populations, meaning that wildlife are managed in a way that “minimizes the likelihood of irreversible or long-term adverse

effects upon such populations and species.” 50 CFR 100.4; 36 CFR 242.4. Section 802 also requires that subsistence uses by rural residents of Alaska shall be “the priority consumptive uses of all such resources on the public lands of Alaska.” Further, Section 804 provides a preference for subsistence uses, specifically “...the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes”. The majority (75%) of Unit 3 moose are harvested by local Federally qualified users which receive an average of 81 percent of Unit 3 moose permits.

If adopted, this proposal would allow the harvest of up to 20 bull moose falling outside of the State antler restriction management strategy on Kupreanof and Kuiu Islands. This additional harvest may have deleterious effects to the breeding population of moose and the recruitment of moose into the breeding pool. The current State management strategy was developed, using age structure and harvest data, to be self-limiting while providing maximum hunter participation and protecting the moose population in the absence of viable population estimates. The management plan targets younger and older bulls while protecting immature bulls and a section of the breeding population. Under this management plan, moose are expanding throughout Unit 3 and are creating new harvest opportunities. Harvest has increased since 2010 with harvest exceeding the 11-year average for the last 5 years. Both hunter participation (# permits issued) and success rate (# moose per hunter) have increased since 2010. Harvest outside of these restrictions would decrease recruitment of young bulls into the breeding pools of Kupreanof and Kuiu Islands and remove additional (previously sub-legal) bulls from the breeding populations. Potential reductions in the breeding population of moose may decrease harvest opportunity for both Federally and non-Federally qualified harvesters in the long-term.

The proposal states that a household receiving a Federal draw permit may not receive a State moose permit. However, if adopted, this regulation could not legally preclude Federal permit holders from receiving both Federal and State moose permits. Federal permit holders would still be limited to a total of 1 moose but may focus more harvest effort on Kupreanof and Kuiu Islands. The shift in harvest effort to Kupreanof and Kuiu Islands by Federal permit holders may result in additional State harvest effort as they qualify to harvest a single moose using either a State or Federal permit (1 moose per regulatory year). Further, moose hunters often hunt in parties which may shift more State harvest effort to the Federal harvest area.

Previous timber harvest activity on Kupreanof and Kuiu Islands left many clearcuts that are now entering the stem exclusion phase, reducing browse, and an extensive network of logging roads that provide hunters with access to moose on much of the islands. Communities are located on Kupreanof island with airport and ferry service making them accessible to local, Federally qualified, and non-Federally qualified hunters.

The restricted harvest area may complicate enforcement of the Federal draw hunt during the concurrent RM038 hunt as there is the potential for illegal bulls to be harvested outside of the Federal harvest area and claimed with a Federal permit. Additionally, the requirement to send a photo of the antlers and a section of the lower jaw of harvested moose to ADF&G requires approval from the Office of Management and Budget and cannot be authorized solely by the Board through a wildlife proposal.

## OSM PRELIMINARY CONCLUSION

**Oppose** Proposal WP22-06.

### Justification

Harvest outside of the State management plan has the potential for long-term adverse effects to the moose populations on Kuiu and Kupreanof Islands. Moose populations on Kupreanof and Kuiu Islands may be susceptible to over harvest due to reduction in browse (clearcut succession) and hunter access both to and on the islands. The draw hunt would provide greater subsistence opportunity for up to 20 households while potentially reducing subsistence opportunity for the remainder of the Federal harvesters in Unit 3. The majority (75%) of Unit 3 moose are harvested by local Federally qualified users which receive an average of 81 percent of Unit 3 moose permits. Allowing for the harvest of up to 20 additional bulls from the road systems near these communities may limit future harvest opportunities for local residents.

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#### Appendix 1. Timeline of Unit 3 State moose hunting regulations.

Year	Season Type	Season	Limit	Conditions and Limitations
1960–1967	State	Sep. 15–Oct. 15	1	1 Bull Moose
1968–1989	State	No Open Season	0	
1990	State	Oct. 1–15	1	Wrangell Island – 1 bull moose with spike-fork-50
1990	Federal	Oct. 1–15	1	Wrangell and Mitkof Islands – 1 bull moose with spike-fork or 50 inch antlers or 3 brow tines on 1 side
1991	State	Oct. 1–15	1	Mitkof and Woewodski Islands – 1 bull moose with spike-fork-50
1993	State	Oct. 1–15	1	Remainder of Unit 3 – 1 bull moose with spike-fork-50 or 3 or more brow tine on one antler
1995	Federal			Unit 3 Federal Season Closed
1995–2008	State	Sep. 15–Oct. 15	1	Units 1B, 3, and 1C south of Point Hobart – 1 bull moose with spike-fork-50 or 3 or more brow tines on one antler with RM038 permit
1996	Federal	Sep. 15–Oct. 15	1	Mitkof and Wrangell Islands – 1 bull moose with spike-fork-50 or 3 or more brow tines on one antler with State permit
1997	Federal			Unit 3 moose customary and traditional use determination changed to residents of Units 1B, 2, and 3.
1998	Federal	Sep. 15–Oct. 15	1	Units 1B, 3, and 1C south of Point Hobart – 1 bull moose with spike-fork-50 or 3 or more brow tines on one antler with State permit
2005–2008	State	Sep. 15–Oct. 15	1	Unit 3 – 1 bull moose with draw permit
2009 – Present	State	Sep. 15–Oct. 15	1	Units 1B, 3, and 1C south of Point Hobart – 1 bull moose with spike-fork-50 or 2 or more brow tines on both sides or 3 or more brow tines on one antler with RM038 permit
2010-Present	Federal	Sep. 15–Oct. 15	1	Units 1B, 3, and 1C south of Point Hobart – 1 bull moose with spike-fork-50 or 2 or more brow tines on both sides or 3 or more brow tines on one antler with RM038 permit
2020	Federal			Residents of Units 1-5 have customary and traditional use determination for Unit 3 moose





**DRAFT STAFF ANALYSIS**  
**WP22-07**

**ISSUES**

Wildlife Proposal WP22-07, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner in Unit 4 be closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users.

**DISCUSSION**

The proponent states that it recently became more challenging for subsistence hunters in Angoon to harvest sufficient deer to meet their subsistence needs due to increased hunting pressure from non-Federally qualified users. They state that regulatory change is needed to protect the deer population from further depletion and increase opportunity for Federally qualified subsistence users.

**Existing Federal Regulation****Unit 4 - Deer**

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

**Proposed Federal Regulation****Unit 4 - Deer**

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

*Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.*

**Existing State Regulation****Unit 4 - Deer**

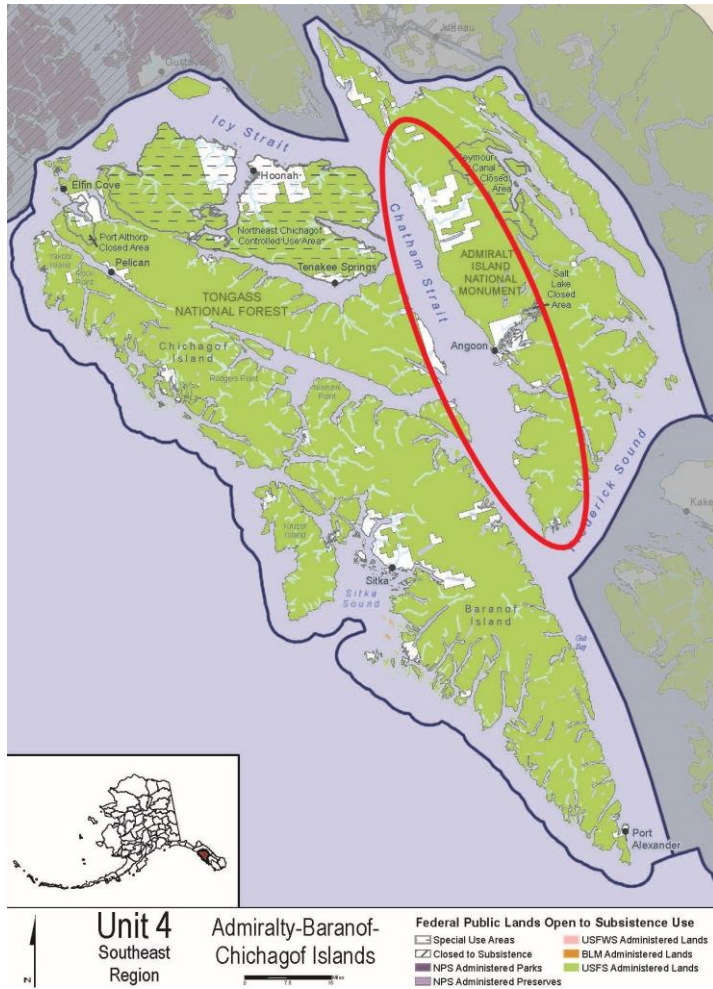
*Chichagof Island east of Port Frederick and north of Tenakee Inlet*

**Unit 4 - Deer**

<i>3 deer total</i>	<i>Bucks</i>	<i>Aug. 1 – Sept.14</i>
	<i>Any deer</i>	<i>Sept. 15 – Dec. 31</i>
<i>Remainder</i>		
<i>6 deer total</i>	<i>Bucks</i>	<i>Aug. 1 – Sept.14</i>
	<i>Any deer</i>	<i>Sept. 15 – Dec. 31</i>

**Extent of Federal Public Lands**

Unit 4 is comprised of approximately 96% Federal Public Lands and consist of 99% U.S. Forest Service (USFS) managed lands and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (**Figure 1**). It consists primarily of Admiralty, Baranof, and Chichagof Islands, along with some smaller adjacent islands.



**Figure 1.** Unit 4 map with proposal analysis area encircled in red.

Most of the area addressed in this proposal is within the Admiralty Island National Monument and the Kootznoowoo Wilderness. The most notable non-Federal land holdings are the area immediately surrounding the village of Angoon, and a strip of land surrounding most of Mitchell, Kanalku, and Favorite Bays, where the Kootznoowoo Corporation owns lands within 660 feet of tidewater (Alaska National Interest Lands Conservation Act, Section 506(a)(3)(c)).

**Customary and Traditional Use Determination**

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

**Regulatory History**

Except for the 1992/93 and 1993/94 regulatory years, the Federal harvest season for deer in Unit 4 has been from August 1 to January 31, with a harvest limit of six deer. Harvest of antlerless deer has been permitted from September 15 to January 31. In 1992, in response to several deep snow winters, the northern Baranof Island area harvest limit was reduced to four deer, the season was shortened to

December 31, and the area closed to non-Federally qualified users. In 1993, the northeast Chichagof Island area was closed to non-Federally qualified users after November 1.

Since 1992, the State season has been from August 1 through December 31 with the antlerless deer season from September 15 through December 31. For Chichagof Island east of Port Frederick and north of Tenakee Inlet including all drainages into Tenakee Inlet, the harvest limit has been three deer while the harvest limit for the remainder of Unit 4 has been four deer. From the late 1980s through 1991, the State general season in the northeast Chichagof area had a harvest limit of three deer. However, the State subsistence season allowed six deer and the season was extended from August 1 until January 31. In 2019, the Board of Game increased the State bag limit from 4 to 6 deer in the Unit 4 remainder area, excluding Chichagof Island east of Port Frederick and north of Tenakee Inlet.

There were three regulatory proposals during the 2010 Federal subsistence wildlife cycle addressing Unit 4 deer regulations following the steep population drop that occurred during the prior harsh winters. These proposals analyzed a variety of timing and harvest restrictions to protect the deer population and subsistence priority. None of the proposals were adopted. Instead, Federal and State managers closed the doe harvest season in the Northeast Chichagof Controlled Use Area (NECCUA) for the 2010 regulatory year and portions of the 2011 and 2012 regulatory years to help the deer population recover from deep-snow winters of 2006 through 2009.

Proposal WP12-06 sought to rescind the January Federal deer season in Unit 4 but was rejected by the Federal Subsistence Board because it would not address a conservation concern and the January season is important for Federally qualified subsistence users. There have been no Federal regulatory changes since 2012.

## **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation where less snow accumulates, and forests provide increased foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet the energetic needs of lactating does. Migratory deer follow the greening vegetation up to alpine for the summer. Resident deer remain at lower elevations. The breeding season, or rut, generally occurs in October through November and peaks in late November (ADF&G 2009). Wolves and black bears are not present in Unit 4, so the primary predator, besides humans, are brown bears. Brown bears are estimated to kill an amount of deer equal to 15%-20% of the annual total deer harvested by hunters (Mooney 2009). Unit 4 deer population levels fluctuate, primarily because of winter snow depths (Olson 1979).

## Habitat

Old-growth forests are considered primary deer winter range, in part because the complex canopy cover allows sufficient sunlight through for forage plants to grow but intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Some areas of Unit 4 have been impacted by large scale changes in habitat, while the habitat is largely intact in other areas. Areas with substantial timber harvest, such as northeastern Chichagof and northwestern Baranof Islands,

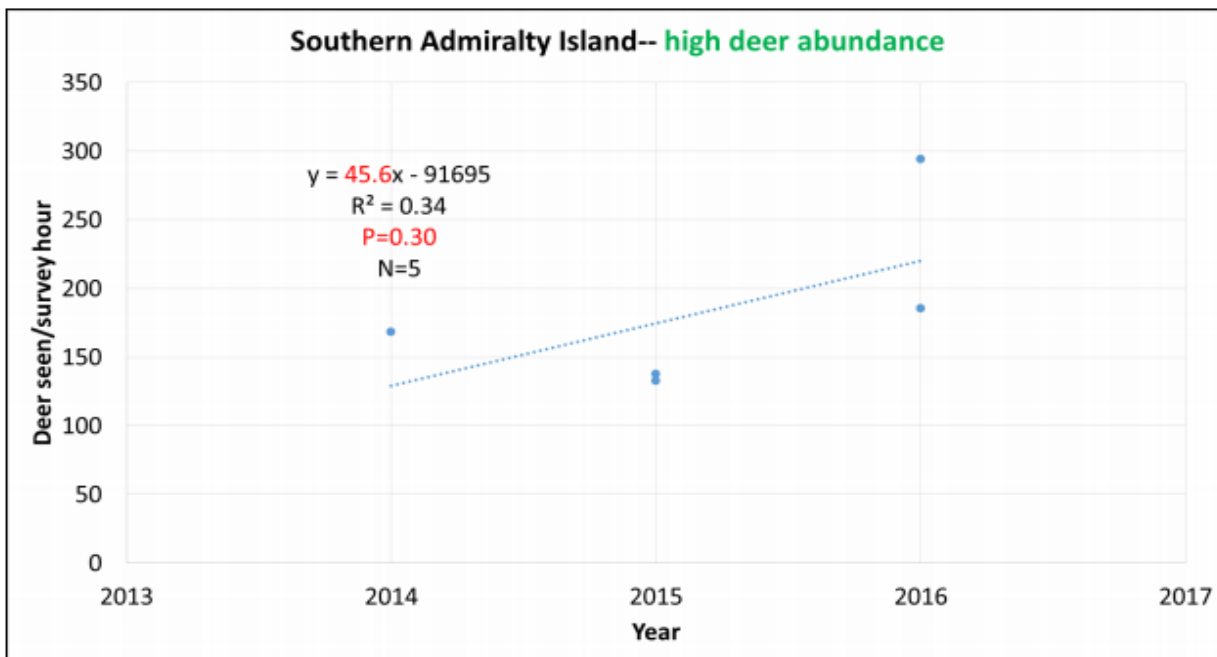
are expected to have lower long-term carrying capacity compared to pre-harvest conditions. Most of the area covered under this proposal is located in productive old-growth forests within Admiralty Island National Monument and Kootznoowoo Wilderness.

### Population Information

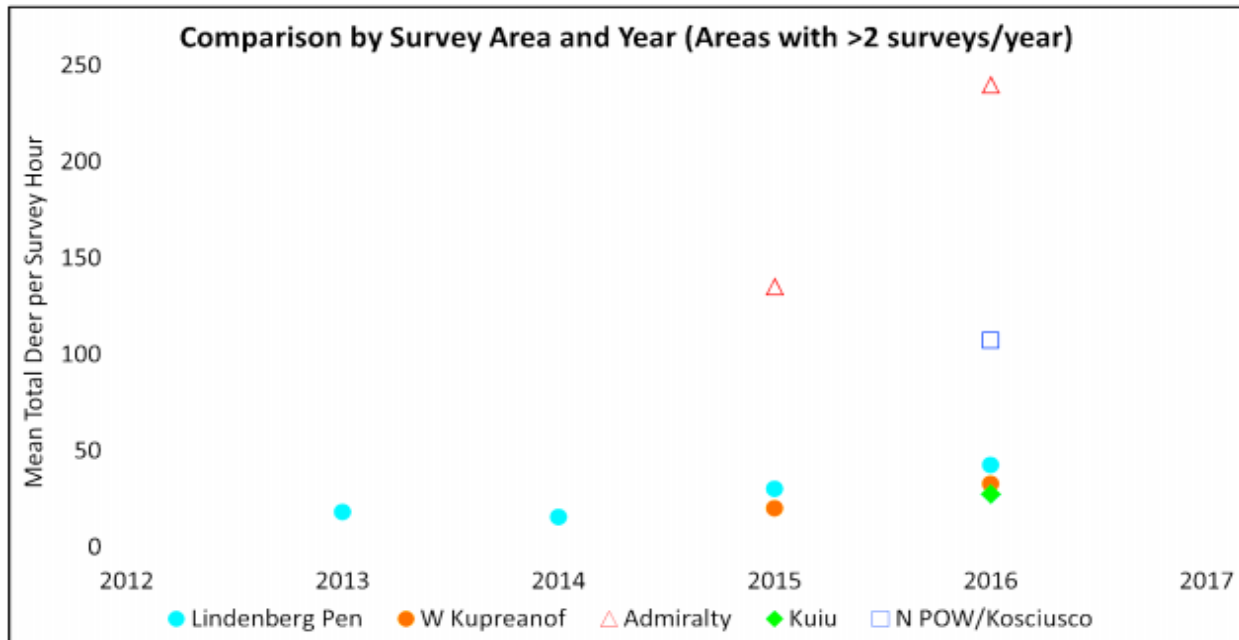
McCoy (2017) outlines the limitations of estimating deer populations, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall.

While no pellet surveys have been recently conducted in the proposal area, surveys in other portions of Unit 4 have shown increases from prior years (McCoy 2019). Pellet counts conducted in 2019 in Pybus Bay, on the eastern side of Admiralty Island, increased by 106% from the previous survey in 1998, and surveys in other nearby Unit 4 areas surveyed (Pavlof Harbor and Kelp Bay) also indicated increasing populations.

ADF&G also conducts aerial surveys during summer in alpine habitat. Between 2014 and 2016, five aerial surveys were conducted on Admiralty Island with increasing results (**Figure 2**, Lowell and Valkenburg 2017). The metrics specific to Admiralty Island were highest of all survey areas in Unit 4 (**Figure 3**).



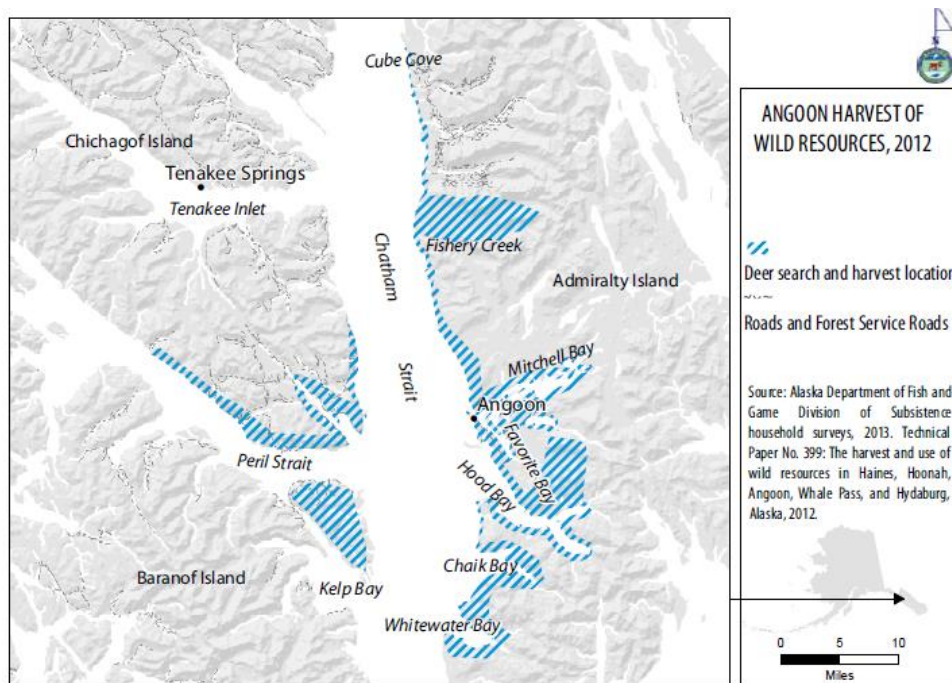
**Figure 2.** Number of deer observed during five aerial surveys on Admiralty Island. (Lowell and Valkenburg 2017).



**Figure 3.** Average number of deer observed per hour during aerial alpine surveys in Southeast Alaska. (Lowell and Valkenburg 2017).

**Cultural Knowledge and Traditional Practices**

Deer are an important subsistence resource for rural residents throughout southeast Alaska. In a 2012 survey of Angoon residents, 49% of households reported attempting to harvest deer, 45% of households reported successfully harvesting deer, and 84% of households reported using deer (Sill and Koster 2017). An estimated 218 deer were harvested, for a total of 17,452 pounds, or 51 pounds per capita. The deer hunting areas documented in the survey ranged from Cube Cove to Whitewater Bay on Admiralty Island, and the Peril Strait areas of Baranof and Chichagof Islands (**Figure 4**).



**Figure 4.** Reported deer hunting locations used by residents of Angoon. From Sill and Koster 2017.

The population of Angoon has been on a steady decline over the past two decades. In the 2000 census, the population was 572, dropping to 459 in the 2010 census, and was estimated at 404 in July 2019, a 30% decline over that time period (Robinson 2020). Angoon and nearby communities maintain strong ties to Juneau as a commercial and economic hub, and many rural residents of the area move to Juneau for economic opportunities. Based on year-to-year changes in residency of Permanent Fund Dividend applicants, an average of 61 residents of the Hoonah-Angoon census area moved to Juneau each year between 2009 and 2020, while an average of 47 moved from Juneau to the Hoonah-Angoon census area (Alaska Department of Labor and Workforce Development 2021).

### Harvest History

The harvest data reported below is based on both mail-out surveys (pre-2011) and returned harvest reports (2011 and later) (ADF&G 2021, Bethune 2020). The overall average reporting rate is about 60-70%, but may be much lower in some small rural communities. To account for hunters who did not report, data are proportionally expanded by community size. If the response rate is low within a community, a small number of hunters may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and used with caution. Trends observed, especially at larger scales, are more likely to be indicative of general population change, however.

Harvest data from 2000 through 2019 were used to evaluate the deer harvest patterns and trends within the portion of western Admiralty Island addressed by the proposal (the “proposal area.”) Harvest and effort were grouped by Wildlife Analysis Area (WAA), which roughly corresponds to major watersheds

or other distinct geographic areas. Since effort was calculated by WAA, individual hunters using multiple WAAs in a regulatory year may be counted multiple times and over-represented in calculations. The WAAs used to represent the proposal area for the purposes of this analysis are displayed in



Figure 5.



The amount of hunter effort in the proposal area, as measured by numbers of hunters and hunter-days, stayed relatively stable between 2000 and 2019 (**Figure 6, Figure 7**). Most of the effort is from non-Federally qualified users, mostly from Juneau, and represented 68% of the hunters and 74% of the hunter-days. The remaining 32% of hunters and 26% of the hunter-days are from Federally qualified subsistence users, the majority residing in Angoon.

Juneau residents comprised 52% of the hunter-days between 2000 and 2019, and Angoon residents comprised 29% (ADF&G 2021). Nonresident effort is low, representing only 2% of the hunter days. Angoon is the only community within the proposal area, and about 65% of the deer hunting effort and harvest by Angoon residents occurs within the proposal area. Most of Angoon's remaining hunting effort and harvest takes place on the east coast of Chichagof and Baranof Islands, across Chatham Strait from Angoon.

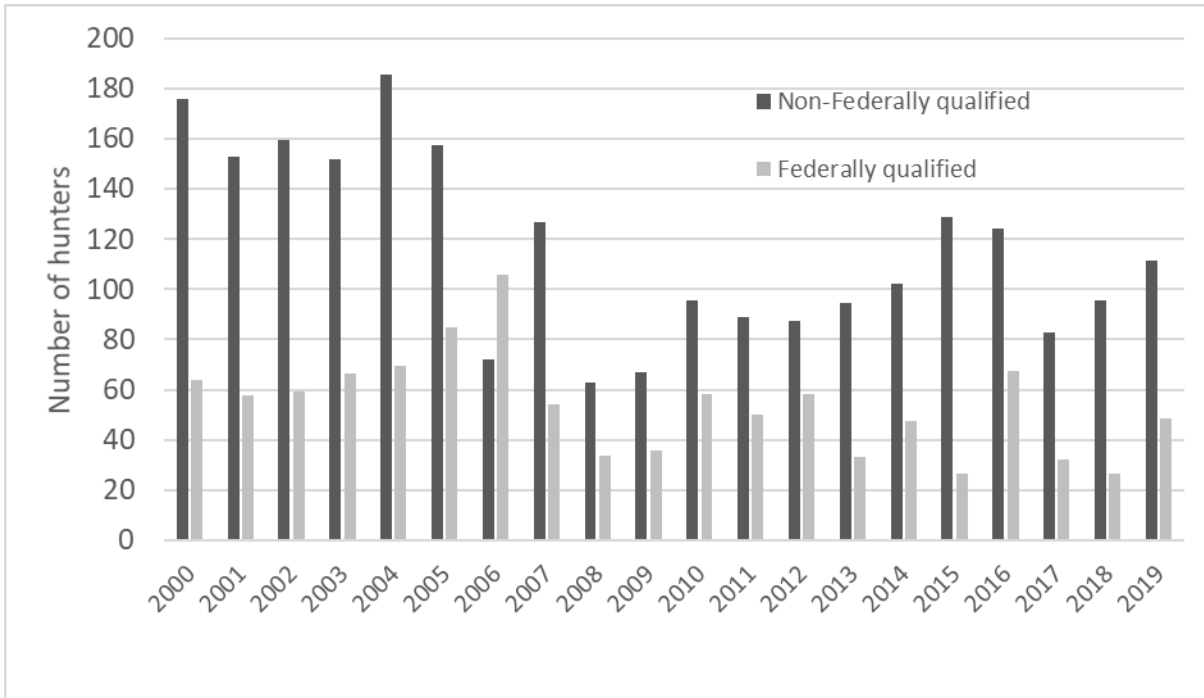
Two measures were used to assess the success rate of hunters over this time period: days hunted per deer harvested, and deer harvested per hunter. Between 2000 and 2019, the number of days it took to harvest a deer remained fairly constant (**Figure 8**. Number of days hunted per deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.). Federally qualified subsistence users required fewer days to harvest a deer compared to non-Federally qualified users, however. The number of deer harvested per Federally qualified subsistence user declined between 2006 and 2009 but has remained relatively stable since then (**Figure 9**). Since 2009, the number of deer harvested per hunter has been roughly similar between Federally qualified and non-Federally qualified users.

The total number of deer harvested in the proposal area by both Federally qualified and non-Federally qualified users has varied over the years, likely due to changes in deer abundance (**Figure 10**). Most years, non-Federally qualified users harvested more deer from the proposal area due to the larger number hunters. Some of the variability in the harvest by Federally qualified subsistence users may be due to shifts in hunting locations. In recent years, the overall number of deer harvested by Angoon residents has remained relatively high, but a larger proportion has been taken from outside the proposal area, or from unknown locations (**Figure 11**).

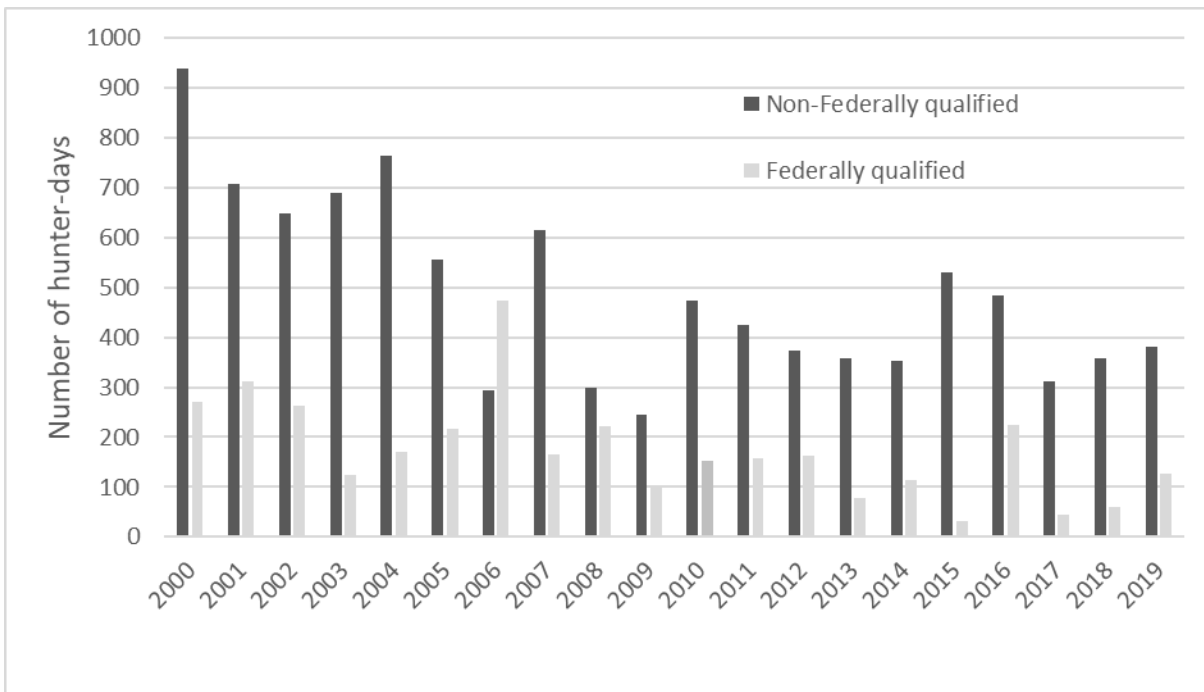
The State deer hunting season in the proposal area runs from August through December. Subsistence users hunting under Federal regulations are permitted to harvest deer during the month of January, as well. Most harvest occurs later in the season, as snow forces deer to lower elevations where they are easier to harvest. Nearly half (45%) of the harvest in Unit 4 occurs during the month of November; and 67% occurs from September through November (**Table 1**). Data are available on a monthly basis, so the proportion of deer taken before and after September 15 could not be calculated.



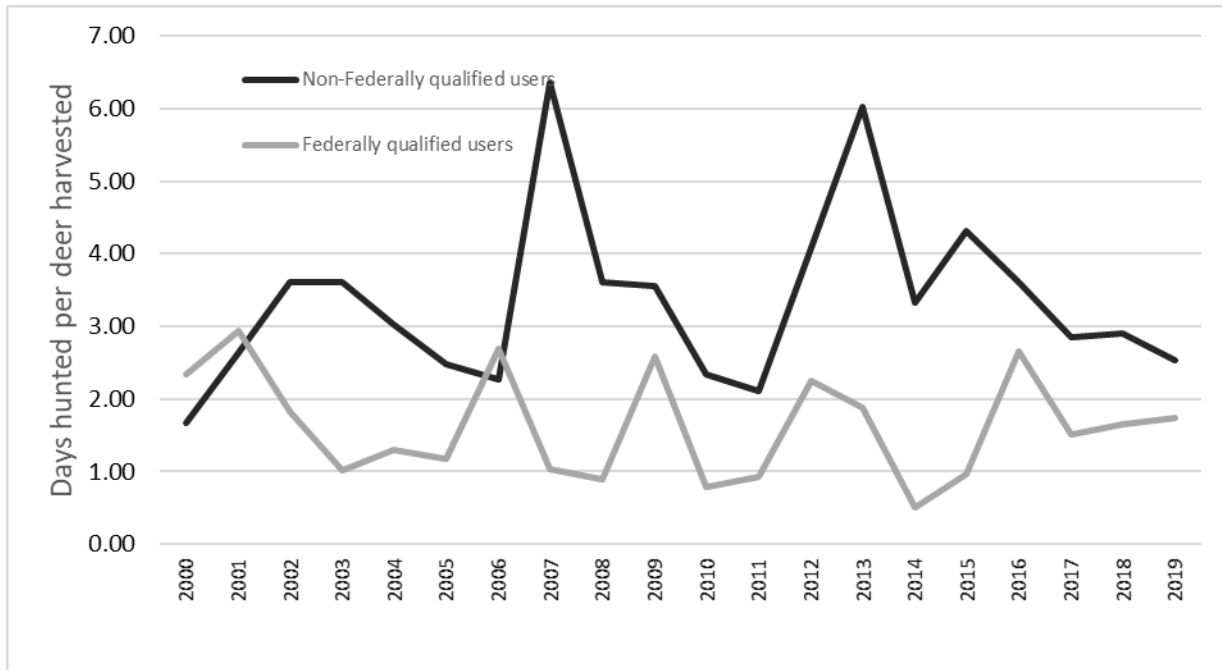
Figure 5. Wildlife Analysis Areas within the WP22-07 analysis area.



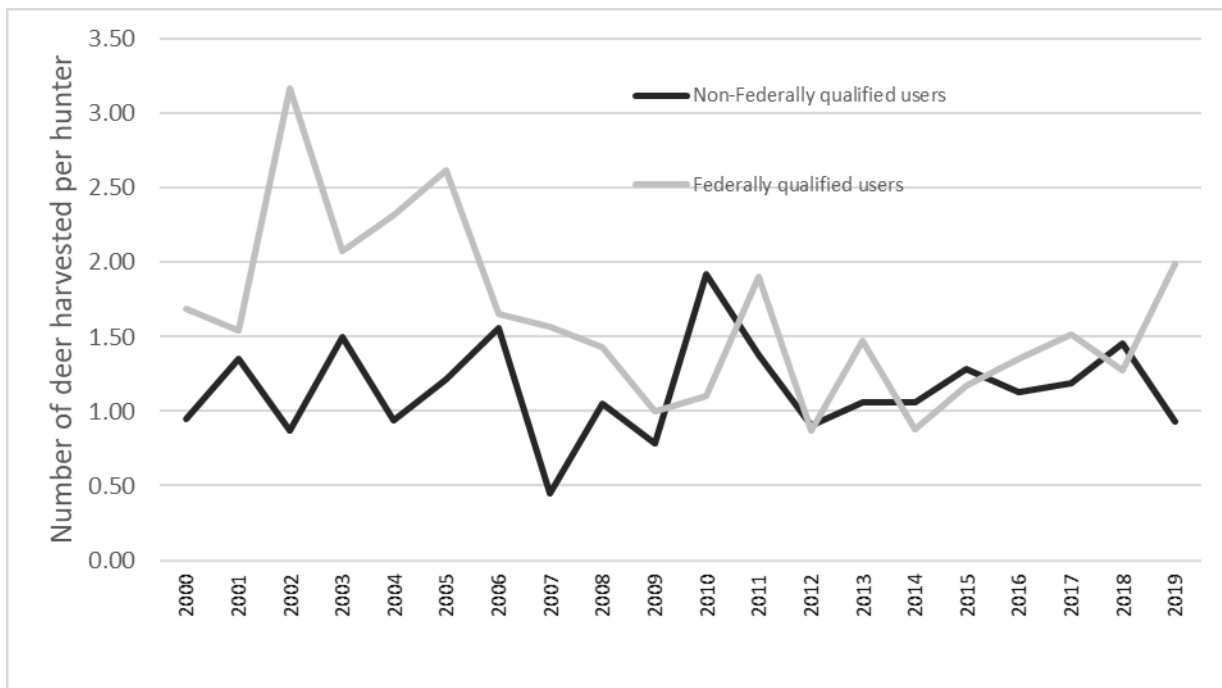
**Figure 6.** Number of Federally qualified and non-Federally qualified users using the proposal area, 2000-2019.



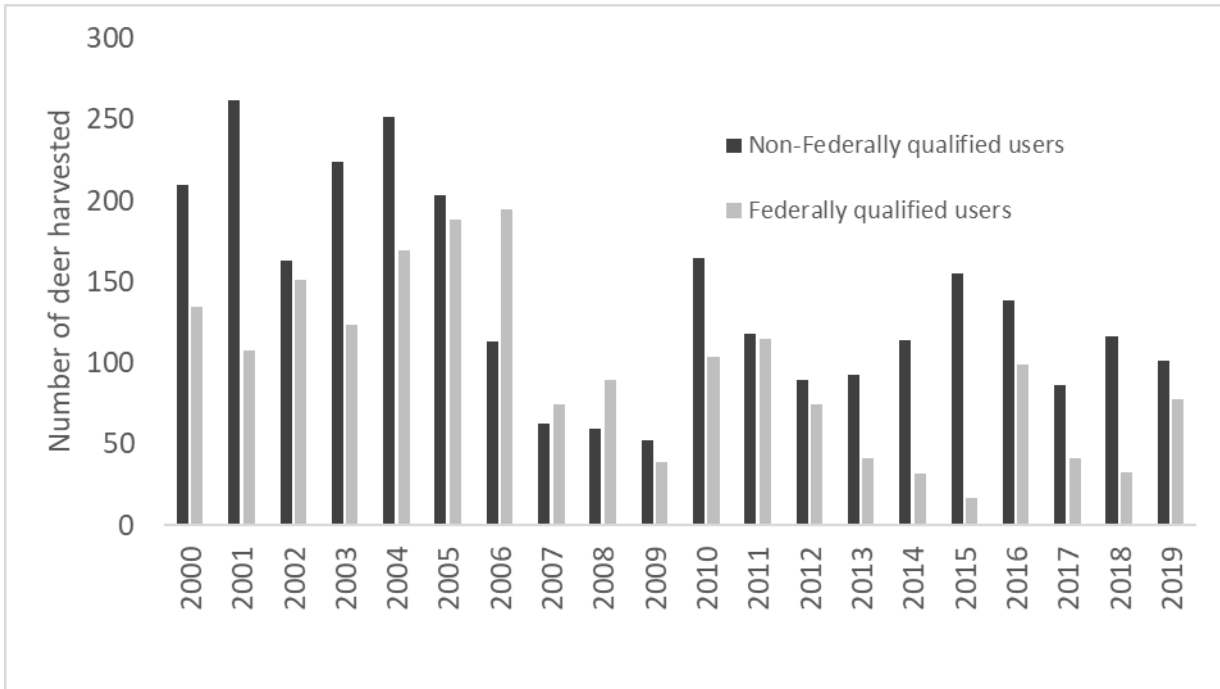
**Figure 7.** Number of hunter-days by Federally qualified and non-Federally qualified users within the proposal area, 2000-2019.



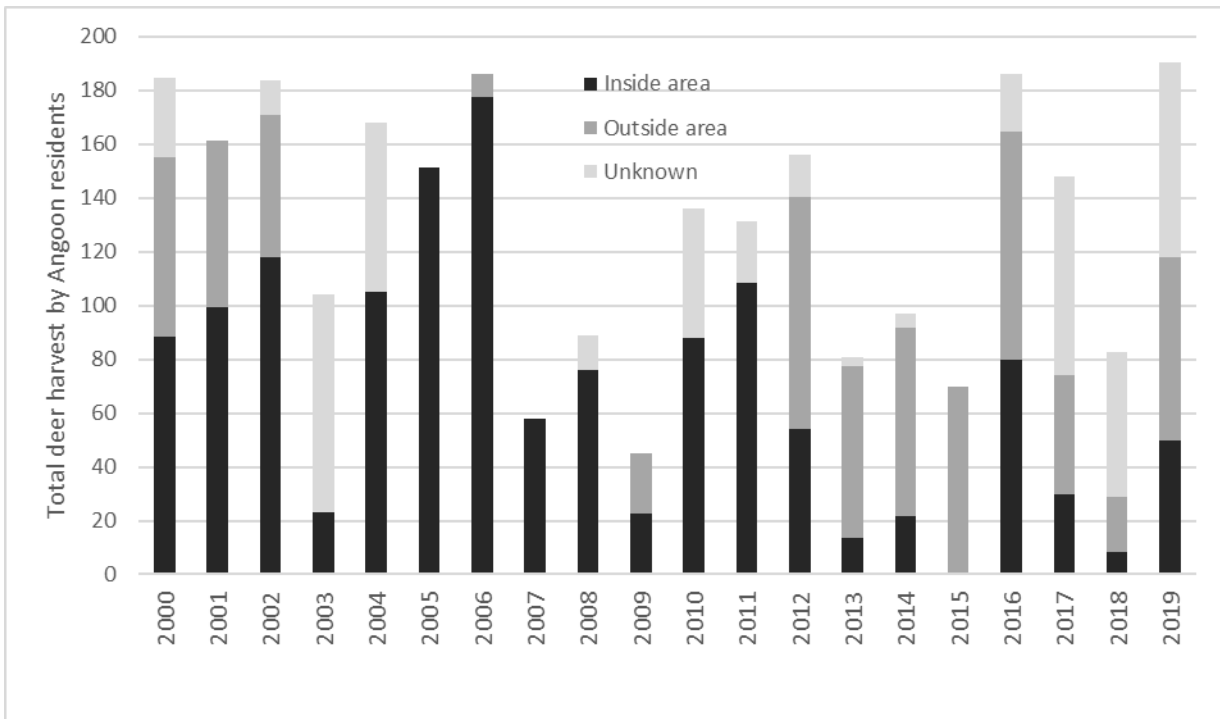
**Figure 8.** Number of days hunted per deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.



**Figure 9.** Number of deer harvested per hunter by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.



**Figure 10.** Number of deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.



**Figure 11.** Total number of deer harvested by Angoon residents, by harvest location, 2000-2019.

**Table 1.** Percentage of Unit 4 deer harvest by month and user type, 2000-2019.

Hunter type	August	September	October	November	December	January
Federally qualified	6%	8%	16%	40%	23%	8%
Non-Federally qualified	5%	6%	13%	53%	22%	0%
Overall	6%	7%	15%	45%	22%	5%

### Other Alternatives Considered

A reduction of the bag limit for non-Federally qualified users in the proposal area would reduce harvest and may reduce competition between non-Federally qualified and Federally qualified subsistence users. However, relatively few hunters harvest the full bag limit, and with high deer abundance a bag limit reduction would likely have a negligible effect on the success rate of Federally qualified subsistence users and may represent an unnecessary restriction on non-Federally qualified users, which is contrary to Title VIII of ANLCA.

Another alternative is to reduce the extent of the closure area. Reducing the closed area to the Angoon Area WAA (roughly the Mitchell Bay drainages) would displace fewer non-Federally qualified users while still reducing competition between user groups in Angoon's most heavily-used deer hunting area. However, even with a reduced area, the proposal may not meet the criteria for a closure to non-subsistence users under ANILCA Section 815(3). Deer populations in the area are healthy, and there is little evidence that Federally qualified subsistence users are having trouble meeting their needs for deer.

### Effects of the Proposal

This proposal would restrict non-Federally qualified users hunting deer on portions of Admiralty Island during the months of peak effort and harvest. Currently, non-Federally qualified users represent roughly 60-70% of the hunting effort and harvest in the proposal area, which is comprised almost entirely of Federal public lands. The proposed September 15 - November 30 closure for non-Federally qualified users would likely eliminate over half of the hunter effort and harvest of deer in the proposal area. Non-Federally qualified users would likely shift their effort to other areas of Unit 4, leading to increased competition with hunters in these other areas. It could also lead to increased effort in the proposal area during the month of December, after the closed period has ended.

The intent of the proposal is to increase opportunity for Federally qualified subsistence users by limiting competition from non-Federally qualified users. However, there is little evidence that the proposed regulation would provide much benefit for Federally qualified subsistence users. Deer populations within the proposal area appear to be healthy and close to carrying capacity and, therefore, the elimination of a substantial portion of the harvest is unlikely to result in a significant increase in the deer population. In addition, if a population increase did occur it could result in the population exceeding its carrying capacity, especially on winter range during years with severe winters, which could negatively affect future Federal subsistence harvest opportunity.

While the proponent states that subsistence users have had trouble meeting their deer needs due to

increased competition from non-Federally qualified users, the effort levels, success rates, and total harvest for all hunters in the proposal area have been stable. The harvest data does not indicate any recent increase in the amount of hunting effort or harvest by non-Federally qualified users, at least over the time period for which data is available. It also shows that within the proposal area, the number of days required to harvest a deer and the number of deer harvested per Federally qualified subsistence user have been fairly consistent for over a decade.

Since there does not appear to be any significant change in the deer harvest and hunting effort by Federally qualified subsistence users in the proposal area, and deer populations in the area are healthy, competition from non-Federally qualified users does not appear to have reduced subsistence uses of deer in the proposal area. However, the perception that Federally qualified subsistence users are experiencing more competition may stem from increases in encountering other hunters, or other user conflicts that are not captured in harvest and effort data. The proposed regulation would reduce the number of such conflicts.

The proposal may also have the unintended consequence of preventing non-Federally qualified users with local ties to the area from participating in subsistence activities. Many people from Angoon and other rural areas move to Juneau to seek employment but return to these communities to participate in subsistence harvesting with family and friends. Under the proposed regulation, these users would be prevented from hunting deer in the area during the closed season.

## **OSM PRELIMINARY CONCLUSION**

### **Oppose Proposal WP22-07**

#### **Justification**

Section 802(2) of ANILCA requires that subsistence uses by rural residents of Alaska shall be “the priority consumptive uses of all such resources on the public lands of Alaska.” Section 804 provides a preference for subsistence uses, specifically “...the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes.” Section 815(3) provides that the Board may restrict non-subsistence uses on Federal public lands if “necessary for the conservation of healthy populations of fish and wildlife” or “to continue subsistence uses of such populations.”

Based on available data, hunting effort and harvest success rates of subsistence users have been stable and favorable over the last 20+ years, suggesting that the closure is not necessary to continue the subsistence uses of the deer population. Deer populations within the area are healthy and there is no conservation concern for deer on the west coast of Admiralty Island, indicating a closure is not necessary for conservation reasons. Thus, the proposed regulation does not meet the criteria identified in Section 815(3) of ANILCA for a closure or restriction of non-subsistence uses.

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## WRITTEN PUBLIC COMMENTS

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

### [EXTERNAL] Alaska Outdoor Council comments - 2022-2024 Wildlife Proposals

Rod Arno <rodarno@gmail.com >

Mon 7/19/2021 12:23 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>

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Alaska Outdoor Council  
310 K Street, Suite 200  
Anchorage, Alaska 99501  
July 19, 2021

RE: Public comments for FSB 2022-2024 Wildlife Proposals

The Alaska Outdoor Council (AOC) is a Statewide coalition of individual members and clubs representing 10,000 Alaskans who hunt, trap, fish and recreate on public lands/waters in Alaska. AOC Club Representative have participated in the regulatory process of managing and allocating fish and game in Alaska since before statehood in 1959.

Numerous proposals submitted by Federal Subsistence Regional Advisory Councils, federally recognized subsistence communities, and individuals confirm the fears that many AOC Representatives had at the time of the passage of Alaska National Interest Lands Conservation Act (ANILCA) 1980. Dual management of who can harvest game depending on whether you are on state public and private lands or if you are on federal lands was not the intend of Congress when they passed ANILCA.

AOC opposes WP22-07, WP22-08, WP22-09.  
Alaska Department of Fish & Game data should not invoke a complete closure to non-Federally Qualified Subsistence Users under Section 804 of ANILCA. Even the 9th Circuit Court, *Ninilchik Traditional Council v. U.S.*, 227 F.3d 1186 in 2000 understood the priority given in Title VIII of ANILCA was not absolute.

AOC opposes WP22-15.  
Congress's findings and declaration in Sec. 801 of ANILCA should leave no room for regulatory action by the Federal Subsistence Board (FSB) regarding anti-trapper claims. Sec. 801(3) of ANILCA should have the FSB concentrating only on "remote federal lands", as was the intent of Congress when they passed 802(2) of ANILCA.

AOC opposes WP22-16 thru 22.  
Providing a priority for some individuals or communities to harvest game on federal public lands located on the Kenai Peninsula only exacerbates the conflict between federally qualified hunters and Alaskans living in non-federally qualified areas of the state. Both groups of hunters are similarly situated.

AOC opposes WP22-32.  
It would be in Alaskan's best interest if the FSB would reduce the number of Alaskans allowed a priority to harvest game on federal lands just based solely on where they live, not how.

Thanks for the opportunity to provide public comments,

Rod Arno, Public Policy Director  
Alaska Outdoor Council

Sent from Rod Arno's iPad.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAL9rk...> 1/1

To Whom It May Concern,

I am writing today thankful for the opportunity to voice my opinion regarding the following proposals.

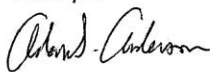
**WP22-07** - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where Juneau residents even on a good weather day cannot reach. It will confine hunting areas to Juneau residents which will increase pressure on already overcrowded areas furthermore helping to create unsafe scenarios. It is discriminatory, unethical, and does not show good land management for the "American people" rather it divides and polarizes Alaskans in the region.

**WP22-08** – I hope this is not a biased proposal toward Juneau hunters and is actually based on science relating to current deer populations. How did we go from 6 to 2? Snow and ice lead to winter die off which effects overall deer populations not hunters.

**WP22-09** - Rural hunters outside of Juneau already have the benefit of a longer harvest period. Just because our jobs and lives are based in Juneau does not mean we want the high cost of inferior meat from Costco.

In closing please do not take away these beautiful places to Juneau residents limiting our access to the outdoors, feeding our families, and the social benefits hunting brings us.

Thank you



Adam S. Anderson

Mike Bethers  
P.O. Box 210003  
Auke Bay, AK 99821  
(907)-321-1186  
[mikebethers@gmail.com](mailto:mikebethers@gmail.com)

June 22, 2021

Theo Matuskowitz  
Federal Subsistence Board  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

Re: Wildlife Proposals 22-07, 22-08, and 22-09

Dear Mr. Matuskowitz:

Please include these comments in the public record. Please give a copy to each board member.

Subsistence deer hunters (Federally Qualified Users or FQUs) from Angoon, Hoonah and Pelican are claiming that non-subsistence deer hunters (Non-Federally Qualified Users or NFQUs) are out competing them for blacktail deer. Village residents are federally qualified and already have priority use of the deer resource as their season runs through January 31, while the NFQU season ends December 31.

The Southeast Alaska Subsistence Regional Advisory Council has developed three wildlife proposals – 22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican – to address claims that NFQUs are responsible for reduced subsistence harvests in these villages. These proposals are based only on comments from villagers and are not based on any actual data or documented observations.

Based on my personal observations made deer hunting in Northern Southeast Alaska over the last fifty years and findings of the Alaska Department of Fish and Game (ADF&G) harvest studies, these proposals can not be justified in any way and should not be adopted.

I have been a lifelong deer hunter and am over seventy years old. The last several years I've spent more than fifty days in the woods annually, and for the last fifty years, my hunting has been in Northern Southeast Alaska; I've hunted in all areas included in these proposals. I can still get up the mountain farther than I can get a big buck out of the woods and am very selective of what I harvest and where. I use a boat to access my hunting areas and do a lot of calling and don't hunt from drivable roads. I haven't been on the Hoonah road system in decades. Every year I let many deer walk away rather than shoot them and have absolutely no problem getting enough deer to meet my family's needs.

Theo Matuskowitz

June 22, 2021

Page 2

**Following are comments that apply to all three proposals (22-07, 22-08, and 22-09)**

NFQUs already have priority to deer as they can hunt through January when deer are often most available while NFQU's season ends December 31.

The winter of 2007-2008 saw a record high snowfall throughout Northern Southeast Alaska and as a consequence, deer were driven to the beach in numbers not seen since. They were at the peak of availability. Since the winter of 2007-2008 there has been less snowfall and deer have not hit the beach in numbers seen during the 2007-2008 winter. In the last three to four years there has been less snow and more rain. Deer have not herded up on the beach much and it has been more miserable to hunt in the rain but hunters I associate with, that like to hunt and eat venison, were out there hunting.

In the areas I've hunted the last ten years, I have seen fewer hunters than in earlier years.

Since the deer killing winter of 2007-2008, the deer populations in all three areas have rebounded and currently are at or near all time highs.

**Comments on 22-07 Admiralty**

This proposal would essentially close federal lands from Pt. Marsden to Pt. Gardener to deer hunting by NFQUs from September 15 through November 30.

Most NFQUs from Juneau who hunt the West side of Admiralty usually turn around at Funter Bay or Hawk Inlet as there are few to no good anchorages south of Pt. Marsden. Also, the proposed closed area is too far from Juneau for day trips. It is my belief that most subsistence hunting from Angoon is done on the beaches, which are not included in this proposal as beaches are state land.

I know several NFQU hunting parties that hunt West Admiralty, mostly north of Pt. Marsden, and they are typically quite successful. I know of two parties of NFQUs that hunt out of Angoon and they always get their deer.

**Comments on 22-08 Hoonah**

Hoonah has really degraded local wildlife habitat through extensive clear-cut logging (which has been shown to significantly impact wildlife values over the long period) and the extensive road system (which has been shown to also reduce the area's wildlife values). The Hoonah road system has become a favorite place to conduct hunting by Hoonah residents, especially after doe season opens. Please note that reduced sailing schedules of the Alaska Marine Highway's ferries have reduced opportunity for NFQUs from Juneau to get to Hoonah to compete with local hunters.

Over the years, deer have adjusted to the heavy hunting pressure along the Hoonah road system. After a week or two of harassment by road hunters, surviving animals move away from the roadside. However, I know those that hunt in the woods accessed by the Hoonah road system have had no problem finding deer.

Theo Matuskowitz

June 22, 2021

Page 3

I have heard of two Hoonah residents who in the past typically shot many more deer than the limit, which would take deer away from other hunters.

Also please note that data shows there is minimal exchange of deer between the north shore of Tenakee Inlet and areas accessed by the Hoonah road system. The mountains on the north side of Tenakee Inlet serve as a dividing line for Tenakee Inlet deer and deer living north of the mountains in areas accessed by the Hoonah road system. Therefore, only areas accessed by the Hoonah road system on northeast Chichagof Island should be included in proposal 22-08 and the north shore of Tenakee Inlet should be excluded.

**ADF&G deer harvest and hunter effort data applies to all three proposals.**

1. Deer populations are at very high levels.
2. There have been substantial decreases in hunting effort by FQUs
3. There has not been any noticeable increase in hunting effort by NFQUs
4. The reduced number of FQUs still hunting are harvesting more deer than in the past.
5. There is simply no justification to support any of the three proposals.

**In conclusion**

There are very high numbers of deer available in all areas covered by these proposals, however, FQU hunters are no longer hunting. They are not taking advantage of the standard deer season (August 1 – December 31) or their priority opportunity of hunting through January. Deer are often most available during January, due to winter snow levels, etc.

Any restriction of NFQU deer hunting opportunity will not increase subsistence harvests in the villages. FQUs from the villages need to get out of the house and out of their vehicles and back into the woods to get their deer. They will have no problem.

Proposals 22-07, 22-08, and 22-09 are based on inaccurate beliefs of FQUs in the villages and lack any justification. Adoption of any of these proposals would be a needless and huge disservice to many hunters in northern southeast Alaska, hunting a strong public resource, on public lands.

Please reject (not approve) proposals 22-07, 22-08, and 22-09.

Thank you for the opportunity to comment.

Sincerely,

Mike Bethers  
Auke Bay, Alaska

Mike Bovitz

9500 N Douglas Hwy

Juneau, AK 99801

(907)723-2279

[Metalworks@gci.net](mailto:Metalworks@gci.net)

Theo Matuskowitz

Federal Subsistence Board

Office of Subsistence Management

1011 East Tudor Road , MS-121

Anchorage, Ak 99503-6199

Re: wildlife proposals 22-07, 22-08, and 22-09

Hello Mr. Matuskowitz:

I am NOT in support of the 3 wildlife proposals-22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican.

The rural subsistence deer hunters/Federally qualified users are claiming it is getting harder to fill their quota of deer. They are concerned about the potential of not enough deer for their personal use to live a subsistence living. There is no science based facts to what is being questioned or science based facts to what they are stating on the deer population.

Alaska fish and game do harvest studies, pellet counts, flights for deer etc, etc. This is all paid for by every Alaskan through tax dollars. Based on their science the number of deer is quite plentiful and Federally Qualified Users already have an extended season going through January 31<sup>st</sup>. Alaska fish and game last year allowed every resident 6 deer instead of the normal 4. Why would they do that if there was a resource problem?

The only thing that has changed over the past years is our weather pattern. Snow is no longer coming in and staying on the beach for long periods of time driving the deer to the beach. Which is a good thing because as those big snow falls happen mother nature NOT man takes over and the deer start to die .

Proposals 22-07, 22-08, and 22-09 are not science based, have no justification, and would be the wrong thing to do to many Southeast Alaska hunters, hunting a public resource.

Please REJECT and NOT APPROVE proposal 22-07, 22-08, 22-09

Thank you for your time,

Mike Bovitz

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] SE Deer Hunting**

Lee Bridgman &lt;Lee.aklife@outlook.com&gt;

Fri 7/9/2021 1:53 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

RE: proposed changes to deer hunting in Unit 4 are WP22-07, WP22-08, WP22-09, and WP22-10.

I myself do not hunt in the Southeast and do not believe the large numbers are making their way to hunt deer in this area. The cost of getting there compared to the game meat taken would make the trip counter productive. As for the Wanton Waste of game meat, I would believe that F&G would be very able to check vessels arriving in Juneau for proper care of the game meat.

The proposals will only further divide the user groups, which is not a desired result. If limits need to be reduced, for all, then so be it.

Do not proceed with these proposals.

Thank you,

**Lee H. Bridgman**

763 Wanda Dr  
North Pole, AK 99705

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAEx...> 1/1

7/6/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07

Tel k <tel.brown89@gmail.com>

Mon 7/5/2021 9:17 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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WP22-07 there is no reason to close deer hunting on admiralty Island to the public. The population is plentiful so there is no need to make this subsistence only. There are plenty of deer on this island and there have been for years. I personally work with people who live or have lived in angoon and none of them have ever had a problem harvesting deer. If they aren't turning in deer tags it's because they don't report the deer they kill. There is no reason what so ever to close admiralty Island for public deer hunting. There are more than enough deer on the island to support hunting. I even work on the island so you can't tell me there aren't enough deer on admiralty.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MMDNjZQAQAMb0...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] FW: [External Email]Deer hunting

Perry, Deanna -FS &lt;deanna.perry@usda.gov&gt;

Mon 7/19/2021 1:30 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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**From:** Alpine Construction Enterprises <alpineconstructionenterprises@gmail.com>**Sent:** Monday, July 19, 2021 1:20 PM**To:** Perry, Deanna -FS <deanna.perry@usda.gov>**Subject:** [External Email]Deer hunting

[External Email]

If this message comes from an **unexpected sender** or references a **vague/unexpected topic**;

Use caution before clicking links or opening attachments.

Please send any concerns or suspicious messages to: [Spam.Abuse@usda.gov](mailto:Spam.Abuse@usda.gov)

To whom it may concern;

I'm writing in reference to:

**WP22-07 2022 Wildlife Proposed Regulation Change Organization**

I am opposed to the changes presented to harvesting of deer in these areas. I do not believe this is an accurate portrayal of the deer hunting situation. As a land owner in the village of Angoon to not be allowed to hunt without permanent residency would be absurd.

Thank you,

Adam Brown

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public comment: Wildlife proposals 22-07, 08, 09

Kelly Cates <kacates@alaska.edu>

Mon 7/19/2021 9:31 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Dear Subsistence Management Board,

I am writing in opposition to wildlife proposals 22-07, 22-08 and 22-09. I am a SE hunter and my family regularly hunts in each of the proposed areas. We rely on subsistence meats to feed us through the year and enjoy the memories created from our hunting trips. It is unclear to me why these proposals were initiated as the data outlined in the packets suggests that deer populations are thriving and that FQU's are harvesting more deer than they used to. So if there are plenty of deer and enough for all users, why should one user group be excluded? Again, I oppose these proposals and hope the facts outlined in the information packets are fairly weighed in the boards decision.

Thanks,  
Kelly Cates

--

**Kelly Cates**, PhD Candidate  
College of Fisheries and Ocean Sciences  
Juneau Fisheries Division, University of Alaska Fairbanks  
[kacates@alaska.edu](mailto:kacates@alaska.edu) | (360) 620-5032

'May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view'



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments for WP22-07,8,9,10**

Matthew Catterson &lt;mattcatterson@yahoo.com&gt;

Fri 7/16/2021 4:30 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I am currently a resident of Juneau, but I have spent most of the past 15 years residing in the Southeast Alaska communities of Yakutat and Sitka. My time living, working, fishing, and hunting in these communities has engendered in me a great respect and connection to the subsistence lifestyle.

Because of my background, I can certainly empathize with the concerns presented by the authors of these proposals. However, the information provided in ADF&G Department comments is aligned with my experiences hunting in the proposal areas, which is that hunting effort in these areas is minimal and that competition between hunters is not responsible for trends of reduced deer harvest by FQUs or NFQUs. I believe it is widely accepted that environmental conditions (harsh winters), not hunting pressure, is the primary driver of deer abundance in Northern Southeast Alaska.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

As an alternative, I would not oppose regulatory changes that increase opportunity for FQU's while maintaining existing hunting opportunity for NFQUs. This type of regulatory change, coupled with ADF&G assertions that deer abundance is relatively stable in proposal areas, may achieve the increased harvest sought by proposal authors.

Thank you for your time and consideration of my comments.

Matt Catterson, Douglas, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/deeplink?popoutv2=1&version=20210711001.05>

1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Unit 4 WP22-07, WP22-08, WP22-09, WP22-10 Proposed closure of Blacktail deer seasons to non-subsistence hunters**

Ken Couch <kc\_n\_gurls@yahoo.com>

Mon 7/19/2021 5:35 AM

To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

Cc: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to these proposals because there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence or even a reason to believe that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

I am getting tired of RACs, aided and abetted by the Subsistence Office of FWS Region7 continuing to waste public funds on these frivolous proposals to give federally-qualified subsistence hunters a private hunting club paid for by all Federal tax payers. Federal Regulations REQUIRE that the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof. Instead, all this is just wasting tax dollars. Maybe all the non-subsistence hunters should start making frivolous proposals that the RAC has to fight. Then maybe they would not have time to waste time and tax dollars on unsubstantiated claims.

Ken Couch

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWw/iOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAHD...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07/08/09

Elias Daugherty <elias1547@yahoo.com>

Mon 7/12/2021 4:39 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

I Elias Daugherty  
Oppose the proposal 22- 07/08/09  
The deer numbers show healthy and Sustainable.

I do think that nNon-residents becoming residents should have a stricter and longer qualification period  
For hunting  
Privileges  
Such as a 5 year stay required.

I also believe if there is a concern about deer numbers being taken that the price for non-resident deer tags should increase. And Stricter non-guided deer hunts.

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQANW...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] deer hunting proposal**

Atlin Daugherty &lt;akhomefire@yahoo.com&gt;

Sat 7/17/2021 10:31 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello my name is Atlin Daugherty I am a third generation Alaskan and my son is forth. I was born and raised in Juneau. I am a commercial fisherman and a hunting guide my two occupations. Deer hunting is very dear to me and my family and our main meat food source. I am writing in opposition to the three proposals to close fee hunting areas to non subsistence deer hunters. I am opposed to all three I personally hunt the North West corner of Chichagof.

The state biologist data for deer numbers and harvest numbers do not support such an aggressive proposals and shut down. Also the displacement of hunts could have a unintended adverse affect on the deer population out side of these areas.

Many people who grew up in villages and now live in Juneau, will be locked out out of these proposed area's. Or multi generational family such as myself and who were born and raised in Juneau who use these areas to deer hunt will no longer be doing so. The Irony of this is Life long Alaskans who live in Juneau or Ketchikan Year Round won't be able to hunt these area while somebody who claims residency in one of these villages spends 4 months there and then spends the rest of the year in Hawaii qualify for these hunts.

One solution to this might be to have the non substance qualified users deer harvest to go back to 4 deer per person rather then 6.

Thank you for your time

Atlin Daugherty

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWw/iOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAJEv...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

John Demuth &lt;jdemuth@pndengineers.com&gt;

Wed 6/30/2021 5:46 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Attention: Theo Matuskowitz

The intent of this email is to voice my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

The population of deer in these areas (as all areas in SE Alaska and Kodiak) has historically been impacted primarily by weather, and in particular the amount of snow experience in a given winter/early spring – NOT by the small percentage of hunters who may choose to venture further away from towns/areas with greater hunting pressure – i.e. Juneau. When heavy snow kills off deer, EVERYONE feels the impacts due to reduced numbers of deer.

W22-07 in particular is extremely exclusive and excessive as it covers over 70 miles of the west side of Admiralty Island – 40 miles north and 30 miles south. This is simple outrageous. NOBODY in Angoon hunts 30-40 miles from town, but rather they hunt primarily in Mitchell Bay due to the close proximity and favorable weather conditions – i.e. protected from high wind/waves. In addition, the vast majority of hunting pressure on the south end of Admiralty is from Petersburg and Kake hunters – who also qualify as subsistence hunters and hence will continue to compete with Angoon hunters – effectively changing nothing. The proposal clearly is intended to exclude Juneau hunters from hunting on the west side of Admiralty Island and will hence increase hunting pressure on the east side of Admiralty. The intent seems reasonable, but the range/area is far too large and should be reconsidered to be more focused on the immediate area around Angoon.

Thank you for your consideration.

- John DeMuth

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAAPd...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Unit 4 deer proposal**

luke dihle <lukeolaf@yahoo.com>

Sun 7/18/2021 8:21 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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In regards to limitations in non subsistence hunters access to federal lands to hunt I believe this time period is too extreme. I am a lifelong Alaskan and currently live in Juneau. I would support some limited period of time that rural communities could hunt around there areas without "outsiders"but this time frame is too long. As shown by the numbers outlined in Fish and games response this does not appear necessary. It's limits many other Alaskans ability to fill their freezer with minimal benefit to a few.

Sincerely  
Luke Dihle

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQACx...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Public Comments Regarding Subsistence Management Program 2022-2024**

Jared Erickson &lt;erickson\_jared@yahoo.com&gt;

Sat 7/17/2021 7:43 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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Public Comments Regarding Federal Subsistence Management Program 2022-2024:

WP22-07

WP22-08

WP22-09

WP22-10

Federal Subsistence Board-

I would like to take this opportunity to voice my opposition to the proposed changes to the above referenced deer hunting regulations in SE Alaska. To manage a population of a targeted animal species for harvest, I do believe it would be a mistake to consider anything other than the health of the population of that species. The ADF&G recently produced a comment response to the above proposed changes and the general trends show that there are fewer FQU's hunting, and they are hunting fewer days per year. The data also strongly suggested that the the Sitka Black Tail Deer populations in the areas referenced above are absolutely healthy and stable. That is, it has been a renewable source of food for all user groups for many years. The above proposals also do not take into account that deer at, or below, the mean high tide mark would still be eligible for harvest by the NFQU user group. I believe that this would actually make the concern worse due to the fact that all hunting efforts in these areas by NFQU's would be focused on the easier deer to harvest. If a NFQU is not allowed to harvest deer at elevation, or via flying into a lake that drains into these areas, the focus will shift to the deer near below the mean high tide level. This would generate the exact opposite effect as what is desired. I also believe it would be very hard to enforce the new proposals. The most concerning example I can think of is what will happen if a deer is shot below mean high tide, but then expires and is recovered above the mean high tide? A difficult scenario and one that invites controversy.

The above areas do have a natural barrier against too much traffic. For the months of concern, the population from Juneau must transit around Point Retreat and navigate Southern Lynn Canal to get to these areas if they are hunting by boat. This is the same body of water that will often prevent the Alaska Marine Highway System from making scheduled trips due to wave height and wind. The FQU's are positioned in the heart of the best hunting areas, giving them distinct geographic advantage.

If the true problem is FQU's not meeting their ANS, there are alternatives to the above proposals. Perhaps the Subsistence Board could consider subsidies to the FQU's in terms of fuel or equipment. Another option may be to liberalize proxy hunting for the communities in need. But if the real reason the FQU is experiencing a decrease in deer harvest rates has to do with fewer hunters putting in fewer days we should not penalize other user groups who use the same resource for the same reasons.

I have been a resident of Alaska my entire life, nearly 45 years, and Sitka Blacktail Deer from the regions above are an important part of calories for myself and my family throughout the year. I would like to voice my support for keeping the hunting regulations as they are and not preventing NFQU's the opportunity to continue to utilize this healthy, renewable source of food in our region.

Sincerely-  
Jared Erickson  
Juneau, AK

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAGq...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments RE: All Southeast deer proposals, including but not limited to WP22-07, WP22-08, WP22-09, and WP22-10

Kyle Ferguson <pabucktail@hotmail.com>

Mon 7/19/2021 5:34 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

As an over 20 year resident of Sitka, and a federally qualified subsistence deer hunter, I would like to state my opposition to the proposals attempting to limit the deer hunting opportunity for non-qualified hunters in Southeast Alaska. My opposition is for the following three reasons:

First, there is no valid scientific reason for the proposed limitations. There are currently no existing or anticipated population concerns for deer in Southeast Alaska. Deer numbers across the region are increasing. With the general pattern of mild winters in the last decade Admiralty, Baranof, and Chichagof deer numbers are as good as they've ever been. In GMU 3 it looks like deer numbers are the best they've been in at least a generation. Scientific study of deer numbers in GMU 4 showed that numbers are high enough to sustain a limit for all residents of 6 deer per year. Anecdotal information from hunters and people who live in Southeast's subsistence communities indicates the general impression of excellent deer numbers.

Secondly, there is no valid social reason for the proposed limitations. In a 7/16/21 article in the Sitka Sentinel members of the Regional Advisory Council were interviewed and stated their rationalizations for these proposals. The reasoning revolved around perceptions of unfairness related to boats and trucks owned by other hunters accessing hunting areas, and perceptions of increased competition and decreased opportunity for federally qualified users. Neither of these points stands up under the scrutiny of facts. No matter who we are, there will always be someone with a better truck or boat than any one of us. Being offended by this reality will make us all a bunch of victim-based thinkers, and in sum are the mere voice of emotions rather than real facts. In regards to the idea of increased competition and decreased opportunity, if anywhere were to qualify for such an idea it would be Sitka, the subsistence community with the greatest numbers of qualified, non-qualified and non-resident hunters. In spite of the greatest numbers of competition, Sitka hunters don't seem to have a problem meeting their subsistence deer meat needs. This fact was acknowledged by Sitka RAC member Harvey Kitka who stated Sitka hunters don't have the problems alluded to by the RAC members from other communities.

In contrast, there are actual social reasons for rejecting these proposals. Deer hunting anywhere, but especially in Southeast Alaska, is a time-honored activity which affords people an opportunity to sustain themselves while enjoying and passing on a heritage that transcends generations. We all live in small towns here. The reality is that for reasons of employment, marriage, medical concerns, education, or various other factors, any one of us could find ourselves with family members living in non-qualified Alaska communities, or down south. I hate to envision a scenario where a grandfather in Sitka, an uncle in Angoon, or father in Kake couldn't take a young person deer hunting because a proposal such as this made it illegal to mentor the next generation.

Lastly, data and facts shows there's no practical reason for the proposed limitations. In the same 7/16/21 Sitka Sentinel article ADF&G biologist Steve Bethune was interviewed. He pointed out some

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

interesting facts related to hunter effort. Across the region it seems hunting pressure is light. Additionally, non-qualified hunter effort has remained stable while hunting effort by qualified subsistence hunters has declined. I don't know why there are presumably less qualified subsistence hunters, or why the same numbers of hunters are hunting less days. But the fact remains that the data shows if anything, hunters in the communities involved in this proposal have even greater opportunity than they did ten or twenty years ago.

Thank you for your hearing and consideration,

Kyle Ferguson, Sitka

sent from [Outlook](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAlsn...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to these proposals

Ron Flint <ron@nuggetoutfitter.com>

Mon 7/19/2021 2:02 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board;

Count me in opposition to the following proposals.

1. western Admiralty from Sept 15 to Nov 30 that includes Hawk Inlet and south WP22-07
2. reduced bag limit for Chichagof (Hoonah and Tenakee, Freshwater Bay) from 3 to 2 WP22-08
3. closure of Lisianski Oct 15-Dec 31 WP22-09

Thank you for your time,

Ron Flint

12070 Cross St.

Juneau, AK. 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAPIS...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments regarding 22-07, 22-09**

Peter Flynn &lt;flynn.peter@gmail.com&gt;

Mon 7/19/2021 8:32 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

To whom it may concern,

I am an active hunter from Juneau, AK who would be affected by proposals 22-07 and 22-09. Myself and the group of people whom I hunt with also respect and hold great respect for the subsistence rights of other people in this state and wholly support their right to put food in the freezer. As hunters we hunt what only we can eat, aren't after trophies, and respect the land. We often hunt out of a cabin off the hoonah road system, always enjoying our conversations with neighbors and locals whether on the ferry, on the roads, or in town. We also fly into many of the affected areas, sometimes directly from Juneau sometimes from other local airports, enjoying the cabins and beautifully different terrains that are available there. I am opposed to the aforementioned proposals as I believe there are better tools than closure to ensure that subsistence needs are protected without wholly excluding other parties, especially with such a healthy population of blacktails. Other tools are available that would provide for all affected parties such as altering bag limits depending on your subsistence qualification. Curtailing bag limits for non-subsistence-qualified hunters in these areas would keep subsistence as the dominant harvests while regional hunters from larger towns would be able to participate, as is being proposed in 22-08.

Thank you for your consideration,

Peter Flynn

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07, WP22-08, and WP22-09

Charles Frey <cfrey09@gmail.com>

Fri 7/16/2021 3:36 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am firmly opposed to WP22-07, WP22-08 and WP22-09. These proposals rely on hearsay & unscientific data to back up the proposed changes. The Alaska Dept of Fish & game who studies these areas is opposed as they cite healthy deer numbers. In addition, these areas are hard to access & have relatively light hunting pressure. This is pure & simple federal overreach & an attempt to lock down Alaska's wilderness for a self-serving reason by those in charge & those who sponsored these proposals.

Regards,  
Charles Frey

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAIRpV...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Oppose WP22-07**

Ben Genz &lt;bengenz@yahoo.com&gt;

Mon 7/19/2021 7:43 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

I am opposed to this proposal as there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

Federal Regulations require the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-07 Deer Hunting proposal for Admiralty Island, Unit 4**

gilbertson@gci.net &lt;gilbertson@gci.net&gt;

Tue 7/13/2021 8:08 PM

To: deanna.perry@usda.gov &lt;deanna.perry@usda.gov&gt;; AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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I am taken aback by the breadth of the proposal to limit deer hunting opportunities on Admiralty Island. It is too far-reaching.

Much of the northern part of Admiralty Island is a popular deer hunting area for residents who don't live in Angoon. I have property and a cabin on Wheeler Creek just east of Pt. Marsden and have hunted there every fall since 1975. I spend many weeks there in the fall. It is part of my urban subsistence lifestyle. Wild food has been part of my existence for many years. In all those years I have rarely encountered people from elsewhere in the woods. It is 40 miles from Pt Marsden to Angoon and it takes a lot of fuel and good weather to go that far for a deer.

Another observation after hunting in the area for 46 years and watching current populations of deer is that there are plenty to go around for everyone. Mostly it is weather that affects whether you can get deer or not, not just keeping other hunters from your area.

My preference is for this proposal to be turned down. However, an acceptable alternative that addresses the intent of the proposal, would be to limit the exclusive area boundary north of Angoon to Fishery Pt rather than Pt Marsden. This would provide adequate exclusive hunting opportunities for Angoon hunters without igniting the urban versus rural debate. It would also continue the opportunity for hunters to fly into Lake Kathleen and Lake Florence.

Steve Gilbertson  
Wheeler Creek property owner

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAHvv...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Opposition of proposals 22-07, 22-08 and 22-09**

Mary Glaves &lt;Mare\_e86@hotmail.com&gt;

Mon 7/19/2021 1:24 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Dear Federal Subsistence Board,

These proposals do not seem to be being proposed based on science and monitoring of deer populations. ADF&G recently INCREASED the annual bag limit of deer from 4-6 in Port Frederick. FQUs are also allotted an additional month (January 1-31) to subsistence hunt, which actually puts unnecessary pressure on deer during the hardest month of winter for the deer, and the easiest month for someone to harvest a deer as they get pushed down to the beaches. These proposals add unnecessary restrictions to Juneau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

[Mary Glaves](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAKtK...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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

Attn: Theo Matuskowitz,  
Office of Subsistence Management  
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska  
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris  
P.O. Box 32403  
Juneau, Alaska 99803

*Richard Harris*

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MMDNjZQAQA0yD...> 1/2



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

July 14, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
 Office of Subsistence Management  
 1011 East Tudor Road, MS-121  
 Anchorage, AK 99503-6199

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Hooton".

Shawn Hooton  
 Vice President, TSI

*Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945*

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Subsistence proposals for Sitka Blacktail Deer in AK**

Brooks Horan &lt;brookshoran@yahoo.com&gt;

Wed 7/14/2021 9:58 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

 3 attachments (2 MB)

WP22\_09 ADFG comments Draft\_Final.pdf; WP22\_08 ADFG comments Draft\_Final.pdf; WP22\_07 ADFG comments Draft\_Final.pdf;

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Dear Sir/Ma'am,

I am writing to express my lack of support for the proposed changes to sitka blacktail hunting in SE Alaska. The data just does not support these changes. I understand that the purpose of the subsistence board is to listen to rural residents in AK. I have respect for the decisions made by the board to ensure proper distribution of resources. As a past Kodiak resident, I experienced scientifically sound board decisions first hand, and benefited from them. But in this instance, the data does not support the proposed changes. Take the Lisianski proposal, the hunter data shows that success rates for rural residents/federally qualified users (FQUs) is the best in the state. Given that success rate, the actual number of rural resident hunters has decreased. There is just no mathematical or scientific reason to support this change to limit access to non-federally qualified users (NFQUs). I fear cutting such huge swaths of land out for FQUs will concentrate NFQUs into a smaller area making overall deer management that much more difficult. I strongly oppose these proposals as a scientist and as a resource user. I have attached the ADFG comments which represents the best evidence to support my input. Thank you for your time and for the work you do to ensure that the best science is followed in these management decisions. I hope this comment reaches you before the July 19th deadline and can be considered in your decision along with the comments of my fellow Alaskans.

Very Respectfully,

Brooks Horan

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlLWvIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAMZ...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Wildlife proposal 22-07**

Aaron Hulett <aaronthenurse@icloud.com>

Sat 7/17/2021 10:13 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Regarding wildlife proposal 22-07 on Admiralty island in Alaska I would like to voice my opposition. The numbers of deer on the island and harvest data do not support the claims made. This change would have a dramatic negative impact on non-federally qualified users and minimal or no positive effect for federally qualified users.

Thank you,

Aaron Hulett  
1670 Mendenhall Peninsula Rd  
Juneau, AK 99801  
(360)460-4179

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAGI7...> 1/1

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

Dear Federal Subsistence Board,

The Alaska Department of Fish and Game's Juneau-Douglas Advisory Committee thanks you for the opportunity to submit written testimony on WP22-07, WP22-08, and WP22-09.

Our 15-member citizen volunteer committee represents diverse user groups and perspectives; we have designated seats for people who represent commercial fishing, sport fishing, hunting/personal use, hunting guiding, charter fishing, trapping, as well as non-consumptive users. We strive to represent the interests of our diverse constituencies, holding a half dozen meetings each year to both discuss fish and game issues as well as to create a public forum for consideration of proposed regulations that impact our region. Under the guidance of the Alaska Department of Fish and Game, our body is charged with weighing proposals that will impact State of Alaska Game Management Units 1C, 1D, 4, and 5, but we pride ourselves in thinking inclusively about our broader region.

Like the Federal Subsistence Board and the Regional Advisory committee, we believe we need to support rules and regulations that create equitable and sustainable fishing and hunting opportunity. As a group, we are thankful to have abundant opportunity to fish, hunt, and feed our families from the land, and, for many of us, to earn our living from well managed and abundant fish and ungulate populations. We also recognize and celebrate the cultural significance that fishing, hunting, and gathering have for so many people in our region. While we live in Juneau--and we recognize that there is more pressure on our wild fish and animals close to town--most of us travel regionwide to hunt, fish, and work, and we are especially mindful of the incredibly important role that hunting plays in rural Alaska. Finally, all our discussions and recommendations are underscored by a strong desire to ensure equitable access to wild food well into the future.

We see that there are legitimate concerns raised by those who participated in the meetings that lead to these proposals; indeed, the lack of ferry service and the broader impacts from the Covid-19 pandemic have created real impacts on food security in rural communities. We are not convinced, however, that these proposals best address the issues raised in the comments.

Instead of addressing these very real food security hardships, we worry the proposals could instead amplify tensions between federally qualified and non-federally qualified hunters, straining cultural and family ties between communities in Southeast Alaska. Because residents of our region move between rural areas and especially Juneau for work and school (and demographic trends suggest this movement from rural to more urban areas has been especially pronounced over the last decade), there are significant numbers of now-Juneau-based hunters who return home to villages to hunt with family. As such, these proposals could in fact reduce harvest success for those who need it most. That is, the non-federally

qualified hunters who successfully harvest animals in each of these areas are often former federally qualified hunters who have moved to Juneau, but return home to help put up food for their families.

In each of these proposals, we also concur with Alaska Department of Fish and Game's detailed and well-researched position that the proposals' respective closures to non-federally qualified users are not warranted for conservation concerns. We therefore see these as allocative proposals, serving to limit opportunity for residents of our region.

We look forward to continuing to listen and to understand the concerns raised by federally qualified hunters, and we stand ready to create a forum to discuss ways to address these issues. Such a forum or open dialogue between users across the region would strengthen our shared interest in sustaining the strong connections to the land provided by traditions of hunting and fishing. We would also be happy to work with the Regional Advisory Committee to propose and champion changes through the Alaska Board of Game process that could alleviate some of the problems.

We urge you to maintain consistent access to deer hunting opportunity for residents of our sparsely populated region by voting no on these proposals.

Sincerely,

Juneau Douglas Advisory Committee

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Wildlife proposals 22-07 through 22-09**

Jones Chiropractic &lt;akchiros@gmail.com&gt;

Mon 7/19/2021 10:34 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

Federal Subsistence Board  
Office of Subsistence Management.  
Attention: Theo Matuskowitz  
1011 E. Tudor Road, MS-121  
Anchorage, Alaska 99503

Dear Federal Subsistence Board,

I have deer hunted Admiralty Island and Chichagof Island for the last 25 years. From my personal experience, I wholly agree with Alaska Department of Fish and Game's (ADF&G's) assessments on the following proposals.

I oppose the Wildlife proposal 22-07 that attempts to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). I wholly support ADF&G's comments opposing this proposal.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes the actual reason for the decline of federally qualified user (FQU) deer harvests are from a decline in participation and effort by FQU's, NOT depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort is also declining. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQU's, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-07 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-08 that attempts to reduce the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA).

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer in NECCUA, ADF&G increased the annual bag limit from 4 to 6 west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer, compared to 3 deer for NFQUs. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-08 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-09 that attempts a closure of Lisianski Inlet, Lisianski Strait, and Stag Bay of Chichagof Island October 15 to December 31.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-09 and respectfully ask that it not be adopted.

Warm Regards,

Resident Hunter of Alaska

--

Dr. Stefanie Jones

10004 Glacier Hwy  
Suite B  
Juneau, AK 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAjov...> 2/3

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP-22 07,08 and 09

David Keller <saltheart76@gmail.com>

Mon 7/19/2021 1:58 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Good afternoon,

I am writing to you today to voice my opposition to proposed regulation changes WP-22 07, 08 and 09. I feel that the changes, if approved, would negatively affect hunters who do not qualify for subsistence permits.

Thank you for considering my comments.

Regards,

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAAlj7...> 1/1

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Changes 22-07 22-08 and 22-09**

Chris klawonn &lt;chris.klawonn@gmail.com&gt;

Fri 7/2/2021 7:18 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello,

My name is Chris Klawonn, I live in Juneau and have been a resident in Juneau for a vast majority of my life. I plan on raising my children here, and I have loved the aspect of boating, fishing, and hunting my entire life. I'd like to keep this short and simple as I hope you are busy reading lots of comments on this topic. Closing the back side of admiralty to specifically Juneau residents is unnecessary, and would be costly and near impossible to regulate. The number of Juneau residents hovers around 35,000, the total number of reported hunters in GMU 4 that reported a harvest in 2019 is 3,377 according to the ADF&G website. Let's assume that every single one of those harvests came from Juneau, which I know from friends and Facebook isn't the case, that's only 1 in 10 people that live in Juneau claiming deer on admiralty. I don't see this as anything near an issue effecting deer population on admiralty. Second, if this proposition did pass you'd need troopers to nearly constantly monitor the back side of admiralty to ensure that nobody is breaking the law. How many officers, boats, and planes would it take to find the few boats from Juneau to genuinely balance the manpower, equipment, and fuel costs. Please understand, I realize the people's frustration of seeing pictures with a huge commercial fishing boat with 20 deer on the bow, and realize that this is a bit excessive on the taking of such a great resource. Even worse is hearing the wonton waste of deer or really any animals, on this island or in any other location. But to squarely place the blame for this on the residents of Juneau is wrong. Admiralty island is 1,646.4 square miles, making it the 7th largest island in the United States. Cutting off half of it to one community of 3000 or so hunters isn't right, and I hope you can see my side.

Good luck with your decision and thank you for your time.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Object to Proposals**

Jay/Amy Lloyd <jayamylloyd@gmail.com>

Mon 7/19/2021 12:28 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to submit my objection to proposals WP22-07, WP22-08 and WP22-09.

The abundance of the animals in the areas as stated by the Alaska Department of Fish and Games objection to the proposals does not warrant this action. Federally qualified hunters also have an extended season that they can hunt these areas. I do not feel that these proposals are necessary or required at this time.

Sincerely,  
Jay Lloyd

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQALXx...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments opposed to proposals WP22-07, WP-08, and WP-09**

David Love &lt;pandalid@yahoo.com&gt;

Tue 7/13/2021 11:51 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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These comments concern Federal subsistence management program's Proposals WP22-07, WP22-08, and WP22-09.

As a hunter who lives in a non-subsistence area (Juneau) but uses sport hunting means to harvest wild game which is an essential source of protein for my annual sustenance, it is my observation (borne out by the ADF&G surveys) that there is not a conservation need to limit sport harvest of deer in any part of Unit 4, Southeast Alaska.

ADF&G Wildlife Conservation has many years of objective, quantitative data that shows that the deer populations in Unit 4 are not depleted, but are in fact at high and stable population levels, even after the heavy snow year of 2020/2021. Restrictions on non-subsistence hunters is not necessary and unfairly targets sport hunters whose numbers and hunt days are stable when NFQUs are declining. Also, the average number of deer harvested in Unit 4 has been stable for all users for 10+ years with good success rates in deer harvested. There is not increasing competition for deer among FQUs and NFQUs.

I urge the Federal Board to NOT support these proposals, and vote to oppose these proposals, since their claims are not true compared to the objective, quantified data showing strong population trends and stable deer harvest in Unit 4.

Thank you for your time, David Love, hunter and resident of Juneau

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**BACKCOUNTRY  
HUNTERS & ANGLERS  
ALASKA**

## **Alaska Backcountry Hunters & Anglers Comments on Wildlife Proposal 22-07 and Wildlife Proposal 22-09**

### **Proposed Change to Federal Regulation:**

*"Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations."*

Backcountry Hunters & Anglers advocates for an ecosystem wide approach to land and wildlife management and to ensure that the public landscapes we speak up for remain open to hunting and angling. We are supportive of science-based management decisions and support the responsibility of state wildlife agencies to manage fish and wildlife populations on public and private land. We support and strongly encourage cooperation between state and federal management agencies to maintain robust fish and wildlife populations on Federal public land.

Alaska BHA has reviewed the proposals submitted by the Southeast Subsistence Regional Advisory Council (SRAC), the meeting transcripts, as well as hunter participation, harvest and population data provided by the Alaska Department of Fish and Game. We recommend the Federal Subsistence Board oppose the proposed closure of Federal public lands to hunting of deer by non-federally qualified users. Alaska BHA does not see that there is adequate information related to deer populations and harvest to meet the high burden needed to close Federal public lands or that these proposed closures will necessarily solve the problems identified by the SRAC.

Although we are opposing this proposal, Alaska BHA would like to bring up concerns that we have, some of which were expressed by the Council.

1. The Council expressed concern in the spring meetings that there is a limited selection of tools available for them to use to address their concerns. Several members expressed hesitancy over supporting these proposals due to their concern that they did not necessarily want to limit non-federally qualified users but lacked any other options.
  - a. Alaska BHA would like to express our support of the Council in this regard and we would take this opportunity to support and encourage the concept of agency co-management. We understand the unique situation of subsistence management in Alaska and believe this situation calls for a stronger working relationship between state and federal agencies than is needed in other states where federal agencies are charged with managing habitat on federal land. An uncooperative relationship between state and federal agencies, as has been recently demonstrated in Alaska by ongoing litigation, leaves hunters and anglers to pay the price, regardless of federal status.
2. Data provided by the Alaska Department of Fish and Game shows that participation by federally qualified users (FQUs) and non-federally qualified users (NFQUs) has been decreasing but that FQUs participation is decreasing at a higher rate.
  - a. Alaska BHA believes that the OSM and ADF&G Subsistence Section should be conducting more surveys to better understand why this decrease is



[WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA\\_BHA](http://WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA_BHA)  
[ALASKA@BACKCOUNTRYHUNTERS.ORG](mailto:ALASKA@BACKCOUNTRYHUNTERS.ORG)

- occurring, particularly when Federal land closures are involved. Factors far outside the realm of deer populations and hunt management can affect participation in a hunt and should be considered.
- b. We would like to make the secondary point that decreasing participation rates among hunters and anglers is a concern of our organization. Our Hunting for Sustainability program is focused on ensuring we have future generations of hunters who will speak up on behalf of our lands, waters and wildlife. We do not want people to stop hunting and fishing, regardless of federal status.
3. Alaska BHA heard from both FQUs and NFQUs who share frustrations about waste of game in areas that receive higher hunting pressure, specifically around the Hoonah road system. When game is wasted it takes away present and future opportunities for both NFQUs and FQUs to put food in their freezers. We encourage Federal and State law enforcement agencies to increase enforcement of existing laws and work with local communities to identify illegal hunting activity.
  4. Backcountry Hunters & Anglers was founded around the need for an organization of hunters and anglers to speak up for an ecosystem wide practice of conservation. The Council discussed several concerns leading up to these proposals that Alaska BHA, out of our concern for ecosystem wide conservation, believes are relevant.
    - a. A general reduction in other available resources causes strain on hunters and anglers, especially those who depend more upon food harvested from the land. Reduced salmon and herring runs means less available opportunities to harvest additional food and increases the need to harvest the food that is available, in this case deer.
    - b. Reduction in resources that other animals depend on increases competition. For example: bears, dependent on robust and healthy salmon runs that are now less consistent, may target more deer and thereby make deer more difficult to harvest.
    - c. We share the frustrations of the Council, and many other Alaskans, over the issue of commercial trawl bycatch when many opportunities around the state to harvest halibut, salmon and other fish to put in our freezers are being limited. This increases strain on both FQUs and NFQUs.
  5. Alaska BHA strongly emphasizes the need for these issues to be addressed and would like to remind both State and Federal agencies of your obligations to manage for subsistence priority, regardless of your definition of user group.

As an organization that counts both federally qualified users (FQUs) and non-federally qualified users (NFQUs) among our ranks, the Alaska Chapter of Backcountry Hunters and Anglers would like to offer our assistance in facilitating long-term solutions to the problems addressed by the Council.



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[ALASKA@BACKCOUNTRYHUNTERS.ORG](mailto:ALASKA@BACKCOUNTRYHUNTERS.ORG)

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Proposal WP22-07**

Jamalea Martelle <jamalealynn@gmail.com>

Mon 7/19/2021 10:14 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing in regards to proposal WP22-07.

I am a resident of Juneau and I consider myself to be a subsistence hunter. My family's main source of protein comes from our harvests of wild game and fish within Juneau and surrounding Southeast Alaska communities. While there are opportunities to hunt deer in the Juneau and Douglas area, my family and I take one to two trips during the fall to Admiralty Island for deer hunting. These trips are traditional getaways and opportunities for us to explore the many beautiful, remote areas of Admiralty. We support the local economy by chartering flights to and from Forest Service cabins. By taking away the opportunity for non federally qualified subsistence users to hunt deer on Admiralty, you are taking away the privilege of many Alaskans that are traditional, subsistence hunters regardless of living rural. I strongly oppose this Proposal.

Thank you for your time,  
Jamalea Martelle

Sent from my iPhone

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6/30/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Southeast proposed subsistence deer limitations**

Charlie Martelle &lt;martellec@yahoo.com&gt;

Tue 6/29/2021 10:29 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Hello,

I am writing about the proposed changes of wp-22 07, Wp-22 08, and wp-22 09. I am not in favor of limiting Juneau residents on these areas. I rely on wild game as my main source of protein. By limiting me and other residents of Juneau we will see an increase in the number of hunters in the areas that are not mentioned. This would mean it would be harder to get away from others and find the game we fill our freezers when we hunt closer to town.

We are already so limited in Juneau with hunting, one needs to either have a boat or charter a float plane to find "good" hunting. By dropping the limit on the road system in hoonah you would essentially take our one hunt that doesn't require owning a vessel or chartering.

From my experience on the coast there is abundant numbers of deer, same with the south west side of admiralty. If there was a shortage of animals I would be all for reducing bag limit, but I do not believe this is the case.

Again I am against any changes to the current regulations.

Thank you for your time  
Charlie Martelle

[Sent from Yahoo Mail for iPhone](#)

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal subsistence hunting and trapping regulations comment 2021**

Sarah Matula &lt;s\_matula1@yahoo.com&gt;

Mon 7/19/2021 1:14 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I have been a resident of Juneau for 8 years, and have been lucky enough to have gained relationships with people through out SE. Through these relationships, I have had the opportunity to learn, experience, and put into practice in my own life the respect and appreciation for the substance lifestyle.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

Thank you for your time-  
Sarah Matula, Douglas, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlLWVlOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAFPo...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Attn: Theo Matuskowitz

Mikesell, John <mik11001@byui.edu>

Sun 7/18/2021 8:08 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

To:

The Federal Subsistence Board

Attention: Theo Matuskowitz

The following is my comment on Subsistence regulation WP22-07:

I disagree with the proposed changes to the regulation. I have had the opportunity to hunt in the Angoon area for the past 18yrs and do not see the need to change the current regulation. I have not seen or been informed of any scientific data that would support the reason for the proposed regulation. Restricting Juneau residents from hunting in those areas would distance family members from being able to hunt in the Angoon community, if anything we want to help these communities. If you believe that this regulation needs to change, I suggest instead of restricting people from hunting altogether, possibly reduce the harvest limit from 6 deer to 4 deer for Juneau residents. I would also suggest limiting taking deer past December 31 to bucks only from December 31st through January 31st(for subsistence). Additionally, if the population of deer is the concern, I strongly disagree with the need to harvest deer past December 31st in the area. Unless an emergency order has been put in place.

Thank you for your time and consideration of my comments.

John Mikesell  
Juneau Resident

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAFP...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP 22-07; WP 22-08; WP 22-09; WP 22-10

Grey Mitchell <fullcurl@live.com>

Wed 7/14/2021 9:04 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attn: Theo Matuskowitz, Office of Subsistence Management

I am writing to oppose the referenced federal subsistence proposals for deer in Southeast Alaska as listed above. These proposals have no basis, as there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. Without specific data to demonstrate a particular subsistence purpose, these proposals are not only arbitrary and capricious, but they will violate the constitutional rights of non-federally qualified users. The credibility of federal subsistence management of wildlife resources on public lands hinges on the use of scientific data. Not only do these proposals lack scientific data, they lack any data to demonstrate a justified subsistence need. I urge the rejection of these unsupported and unjust proposals. Thank you.

Grey Mitchell  
Alaskan since 1966  
3065 Douglas Highway  
Juneau, Alaska 99801

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAAl9o...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-07, WP22-08, WP22-09**

Richard Morris &lt;akreeldeal@gmail.com&gt;

Mon 7/19/2021 8:40 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Attention Teo Matuskowitz

Good day,

There are a few proposals that I am writing in opposition to.

The first is WP22-07, which proposes to close the western side of Admiralty from Hawk inlet to the southern tip to non-federal users to make it easier for one group to gather food. I also try to fill my freezer with wild game so this would be selecting them over me. Although I have never hunted the area due to its remoteness and difficulty to get to during the hunting season I feel it will be a stepping stone to closing more of the National Forest as they request larger areas to make it easier for them and more difficult for others. I would say that looking at the ADFG hunt records would show that the majority of hunt effort from Juneau is on the eastern side of Admiralty island and any that can make it to the proposed area would say that hunting there is so much more easy than the eastern side. It is all relative.

WP22-08 is the looking to close the northern area of Chichagof island to non-federal users. I bought property in Freshwater bay for the main purpose of hunting. There are already regulations in place that have a harvest limit of 3 deer versus the 6 I could shoot anywhere else on the ABC islands. This is another remote area for someone from Juneau to access and has limited pressure from Juneau as could be found in the hunt records. The majority of deer that are harvested in the area are mainly road hunts as there is an abundance of logging roads throughout the area. As is the case with hunting, it can be challenging for those that don't get out into the forest and expect to fill there freezer shooting deer on the side of the road. Closing this area would impact the value of my cabin and experiences that come with having it there.

WP22-09 is looking to close other areas in the Hoonah area. Again, due to the remoteness this area does not get a lot of pressure from non-federal users.

In closing, these three proposals are trying to make harvesting deer a sure thing for the communities of Angoon and Hoonah. It is hunting, there are no guarantees that you will see a deer, let alone harvest one. Closing these areas will only benefit a few, and probably only to a small degree. These

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

areas are in the Tongass National Forest, which is to be managed for all user groups. With these proposals it will start to be managed for the select few and I oppose it.

Thank you,

Rich Morris

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAN1n...> 2/2

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal 22-07, 22-08, 22-09

Michael Nelson <michaelbn78@gmail.com>

Thu 7/1/2021 2:49 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

I am writing in opposition of these specific proposals, Wildlife Proposal 22-07, Wildlife Proposal 22-08 and Wildlife Proposal 22-09.

These proposals discriminate against Juneau residents unjustly. Excluding the small percentage of Juneau residents that have the ability to hunt in these areas will not increase subsistence means.

Michael Nelson  
208-755-7618

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQABsq...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Angoon Resident Comment on subsistence regulation WP22-07

James Parkin <jwparkin4@gmail.com>

Fri 7/16/2021 6:24 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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To:  
The Federal Subsistence Board  
Attention: Theo Matuskowitz

Mr. Matuskowitz

The following is my comment on subsistence regulation WP22-07:

If the regulation is adopted it should include an allowance for Juneau residents to be able to hunt with friends and family of those who live in Angoon or other communities within the restricted area. If this provision cannot be given the regulation should not be adopted. Too many who once lived in the area but had to move to find work or medical care, still have family and friends in the area and return home for subsistence from time to time.

Thank you for your thoughtful consideration of my comments.

P.S.  
Please reply to my email to let me know my comments have been properly submitted and will be reviewed.

Jim Parkin

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQACg...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Attention: Theo Matuskowitz - Comment on the subsistence regulation  
WO22-07

Crystal Shumway <sweetcrystal31@yahoo.com>

Sat 7/17/2021 7:49 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Mr. Matuskowitz

The following is my comment on the subsistence regulation WP22-07

I do not agree with the proposed changes to the regulation. I have been living in Angoon for 28 years and do not see the need for such a drastic change to the current regulation. Furthermore, at this time I have not been informed of any scientific data supporting the changes. Friends and family that grew up in Angoon still return from time to time for hunting. If you strongly believe the the regulation needs to be changed. I would suggest that you look at a change in the limit instead of cutting people off all together. For example, instead of 6 deer maybe 3 for non residents of Angoon.

Thank you for your time and consideration of my comments

Jimmy Parkin

P.s.

Please email me to let me know my comments have been properly received and will be reviewed

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAKS3...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-07**

nicholasporr &lt;nicholasporr@yahoo.com&gt;

Mon 7/19/2021 1:51 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

I am writing to urge the board to not pass WP22-07. Though the proposal claims that non-federally qualified hunters are impinging on the ability of federally qualified hunters to meet their subsistence needs, his own testimony at the SE AK federal subsistence board indicates that was not the reason for the proposal. Rather, he said he wanted to limit activity of fall bear hunters who he had caught stealing from his crab pots. While I certainly sympathize with the proposal's author, this proposal is the wrong course of action to address his concerns. It was suggested to the proposal's author at the SE AK federal subsistence board meeting that contacting the USFW district ranger might be a more appropriate course of action. I agree with that suggestion and add that the author might be better served using the ADFG proposal process to address the actions of bear hunters.

This proposal will do nothing to increase the ability of federally qualified hunters to meet their subsistence needs. Most of the non-federally qualified hunters in that area are likely friends & relatives of Angoon residents. As such, given the distance and expense involved in accessing this area, passing this proposal will only serve to strain cultural ties between Angoon and their Juneau based friends and relatives.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAMN...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07,08,09,10

Tom Radandt <tomradandt0@gmail.com>

Fri 7/9/2021 2:52 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

There is no scientific evidence that supports the idea that non-Federally qualified users impact the success of qualified users. Therefore you must reject proposals 22-07, 22-08, 22-09 and 22-10.

To favor one group over another bases on any political characteristics is discrimination, which illegal.

Tom

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAEqr...> 1/1



**unapologetically FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436  
email [info@residenthuntersofalaska.org](mailto:info@residenthuntersofalaska.org) web [www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)

July 19, 2021

To: Federal Subsistence Board  
Office of Subsistence Management  
(Attn: Theo Matuskowitz)  
1011 E. Tudor Road, MS-121  
Anchorage, Alaska 99503-6199

Re: Federal Subsistence Board 2022-2024 Wildlife Proposals and Existing Closures

Dear Federal Subsistence Board Members,

Resident Hunters of Alaska (RHAK) represents several thousand members from across the state, rural and urban, who advocate for sustainable wildlife management policies and a resident hunting priority according to Article 8 of our state constitution.

RHAK participates in Regional Advisory Council (RAC) meetings and Federal Subsistence Board (FSB) meetings, and we have become alarmed at the continuing wildlife proposals and special action requests that are not based on actual biological emergencies or conditions that would prevent federally qualified subsistence users (FQU) from meeting their subsistence needs.

What makes any FSB closures and restrictions especially problematic is that there is no differentiation in the federal system between Alaska residents and nonresidents from another state or country; both Alaska residents and nonresidents are deemed the same under federal regulations by definition of a who is a FQU. A prime example of why this is so problematic is that often complaints about competition from non-local non-federally qualified subsistence users (NFQU) center on the nonresident component, which can often comprise the majority of NFQ hunters participating in these hunts. So, when any restrictions or closures on federal lands happen, Alaskans who used to live in a designated rural area but for whatever reason have moved to more urban areas of the state, can't return home to hunt and carry on their traditional hunting activities on federal lands, nor can other Alaskans participate in these hunts.

It has always been RHAK's position that when and where we have wildlife conservation concerns or subsistence opportunities are not being met, that the ***nonresident component should always be the first group of hunters***

Page 1 of 3

***Resident Hunters of Alaska Comments  
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures***

**restricted.** If other restrictions are still necessary, only then can we support restrictions on resident hunters.

We have always advised RACs to first use the Board of Game (BOG) process when and where there are concerns with too much competition from non-local NFQ hunters, as the BOG can differentiate between Alaska residents and nonresidents.

### **Comments on Individual Proposals and Existing Closures**

**WP22-07** Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.

#### **OPPOSE**

The rationale of WP22-07 is not based on any biological data or harvest statistics that show a conservation concern for the deer population on Admiralty Island or that subsistence needs are not being met.

According to Alaska Department of Fish & Game (ADF&G) data, over the last decade we have had mild winters in Game Management Unit 4 and the deer population is *“high and stable.”* The deer population on western Admiralty Island is **not** depleted, as the proposal states. Nor are there any conservation concerns for the deer population under the current hunting regulations.

The proposal also states that there has been increased *“hunting pressure”* from NFQ hunters and it has *“become more challenging for subsistence hunters in Angoon to harvest sufficient deer for their needs.”* But according to ADF&G data, over the last two decades there has been a **decrease** in both the number of FQU and NFQU.

The FSB operates under ANILCA guidelines and the federal code of regulations that govern when and why any closures to NFQU can happen: *“With respect to subsistence uses of a particular fish or wildlife population, the Board may only approve a proposed closure if necessary for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA §816(b), 36 CFR 242.10(d)(4)(vii) and 50 CFR 100.10(d)(4)(vii)).* **Meanwhile, the Board may approve a proposed closure of nonsubsistence uses of a particular fish or wildlife population for any of these same reasons, or if necessary for the conservation of healthy populations of fish and wildlife,**

Page 2 of 3

*Resident Hunters of Alaska Comments  
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures*

**or to continue subsistence uses of such population (ANILCA §815(3), 36 CFR 242.10(d)(4)(vi) and 50 CFR 100.10(d)(4)(vi)).”<sup>1</sup>**

The Board should vote down this proposal based on the above guidelines of when any restrictions or closures on federal lands for NFQU are allowed to happen.

---

**WP22-09** Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.

**OPPOSE**

Refer to our comments on WP22-07

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**WCR22-01 Deer** Prince of Wales closed Aug. 1-15, except by Federally qualified subsistence users; non- Federally qualified users may only harvest 2 bucks

**Rescind closure to NFQU on Price of Wales Island**

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**WCR22-45 Caribou** Unit 23 - Portions of Unit 23 - closed to non- Federally qualified users

**Rescind closure to NFQU in those portions of Unit 23**

---

Thank you for the opportunity to comment.

Sincerely,

Mark Richards  
Executive Director Resident Hunters of Alaska

---

<sup>1</sup> <https://www.doi.gov/sites/doi.gov/files/uploads/closure-policy-revised-2020-08-04.pdf>

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

Mark Sams &lt;msams@pndengineers.com&gt;

Mon 7/19/2021 7:53 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Attention: Teo Matuskowitz

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

## WP22-07

I oppose this change to the deer hunting regulations on the Chatham straight side of Admiralty Island. The regulation will only isolate one user group which has a very low impact on the area due to the distance from Juneau. Due to the distance Juneau residence do not regularly access this area since it is more than 1.5-2hr run time. All other local communities are subsistence communities including, Petersburg, Kake, Tenekee, and Hoonah, leaving Juneau, the furthest community from the location a user group that would be isolated. I think it would be very easy to look at the hunting records collected by the state of Alaska every year to determine how much pressure Juneau actually has on the location to determine how much this change in regulations would actually effect the overall hunting pressure.

## WP22-08

I oppose this change to the northern Chichagof Island since it again singles out a single user group. I currently Own a cabin on norther Chichagof Island but am a Juneau resident. This proposed change would limit my access to deer hunting at my cabin which I have invested heavily in over the past 5 years to use as a place to hunt. For me, the area is difficult to access from Juneau due to weather and distance, over 2hrs. Again if you look at hunting records, I believe you would find Juneau residences have a limited impact on the overall harvest on Norther Chichagof Island.

## WP22-09

I oppose this change in regulations for closing deer hunting in Lisianski Inlet. This area is also very remote and very difficult for non-subsistence hunters, Juneau residence, to access. Hunting records should show that this area is seldomly access from Juneau this time of year due to weather so this proposal will have little effect on competition. The only residences this change will effect are from Juneau since access is limited to Pelican and Elfin Cove.

In general I believe instating restrictions that only effect one group is a poor decision that becomes a slippery slope for other communities to make similar requests. Pretty soon, Juneau would have very limited hunting locations in a National Forest that is supposed to be managed for all user groups. If subsistence user groups are having difficulty harvesting deer, maybe that's an indication that the bag limits for all groups are to high and a better proposal would be to limit all harvest verses a single user group that has low impact on all three proposed areas. Another option would be to limit the ability to proxy hunt. I know fishermen can go out and

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

get to these remote places in the winter and shoot more deer than their limit due to proxy hunting. I understand the need for it in certain instances, but maybe limiting the number of proxy tags allowed to hunt at one time would help spread the pressure out over a longer period and less deer would be harvested. This would reduce the overall pressure and competition for sub-subsistence harvesters.

Historically these areas being proposed, as all deer habitat, is far more effected by weather and old growth timber harvests (heavy snow and large scale timber clear cuts) than the limited number of hunters. When these environmental and man-made (timber harvest) factors affect the population, all hunters are effected equally.

These proposed changes will also hurt any non-resident hunting charters that are based out of these local communities, hurting the local economies. Non-resident hunters will bring a large boost to these small communities at the end of the typical tourist season helping fortify the community with funds to weather the winter. Out of town hunters will not use Angoon based on the proposed WP22-07 since they would be very limited in hunting locations.

Thank you for taking the time to read my comments.

Mark Sams

Owner of Cabin in Freshwater Bay, Directly effected by 2 out of three of these proposed changes.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212**

CHARLES SCHULTZ <cjs16@me.com>

Sun 7/18/2021 3:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attention Theo Matuskowitz,  
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12. Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoonah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration. Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration ,  
Charles Schultz  
Juneau, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAD6p...> 1/2

SCI Alaska Chapter  
 Eagle River, Alaska 99577  
 Cell (907) 903-8329  
 Tel: (907) 980-9018  
[www.aksafariclub.org](http://www.aksafariclub.org)



July 19, 2021

Federal Subsistence Board  
 Attn: Theo Matuskowitz  
 Office of Subsistence Management  
 1011 East Tudor Road, MS-121  
 Anchorage, AK 99503-6199

[Electronic Submission]  
[subsistence@fws.gov](mailto:subsistence@fws.gov)

RE: SCI-AK comments on Wildlife Proposal 22-07 Admiralty

Dear Chairman Matuskowitz,

The Safari Club International Alaska Chapter (SCI-AK) writes in opposition to Wildlife Proposal 22-07 (WP22-07). Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI-AK is nationally and internationally recognized for its contributions in support of SCI's four major mission areas: Advocacy, Conservation, Education, and Humanitarian Services.

WP22-07 is counter to our goal of ensuring fair and equitable access to game resources in Alaska. The below comments focus on the indices of deer abundance, deer hunter effort, and harvest in Alaska Game Management Unit 4 (GMU 4) as reasons to reject WP22-07.

The proposal claims that non-federally qualified users (NFQU) are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer in GMU 4. WP22-07 asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Alaska Department of Fish and Game (ADF&G) analysis of deer population, hunter effort, and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5), excluding Juneau and Ketchikan, are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game increased the deer bag limit in GMU 4 from 4 to 6 deer because of the GMU's uniquely healthy population of Sitka black-tailed deer.

GMU 4 consistently shows a high black-tailed population. Pellet group counts are usually well above the high-density threshold and are often double the counts in other GMUs. Aerial surveys — measured in deer/hour sighted — were conducted for two locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska and estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe

*Safari Club International Alaska Chapter  
 First for Hunters - First for Wildlife*

winters. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Yet, based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

GMU 4 Sitka black-tailed deer are usually above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns. Taken together, these indices of deer abundance — pellet group surveys, alpine counts, mortality transects — suggest this proposal cannot be based entirely on a conservation concern.

Overhunting is often used as a justification for area closures or implementation of restrictive conservation measures. ADF&G produces estimates for hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. From 1997-2019 the estimated average annual harvest in GMU 4 has been 5,725 deer taken by 3,282 hunters. GMU 4 supports the highest deer harvest in the state and the historical harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs. From 1997 to 2006, FQUs harvested on average 152 deer annually. Since 2013, FQUs have harvested an average of 49 deer annually. This represents an approximate 70% decline. There is a similar pattern for NFQUs, who averaged 349 deer annually from 1997-2006. Since 2013, that average has declined to 115 deer annually. SCI-AK notes hunter numbers are decreasing across the board on a national level, not just in Alaska or even GMU 4. This proposal will further restrict access for hunters and lead to a further decrease in the number of hunter's in one of the state's most viable hunting regions.

The Alaska Board of Game has also established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law, ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The board establishes an ANS for a game population through review of long-term population and harvest information. With deer harvest levels within the recommended ANS range, the argument that the closure needs to occur in order to benefit ANS users is moot.

SCI-AK members are especially supportive of family hunting traditions because learning to hunt starts with family and community mentors. FCU status is not inherited. Children who leave federally qualified communities to attend school elsewhere will be excluded and harmed by WP22-07. In November, many FCUs invite their family members home for peak season deer hunts. Other NFCUs return to traditional hunting areas to harvest deer on state hunting proxies or kill deer on their limit to share with family, friends, or elders. None of this use would be allowed to continue in the WP22-07 area if it is passed.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters, and field observations by management biologists, the department has concluded that there is no conservation concern for the GMU 4 deer population. With deer population remaining high and stable, harvest within its historical range, and state ANS requirements being met it is unnecessary to restrict hunting in GMU 4 to the benefit of a small handful of users. WP22-07 will reduce the amount of deer meat coming into communities while simultaneously failing to provide conservation benefits to an already healthy deer population. SCI-AK urges you to not adopt WP22-07.

Thank you for your consideration.

*John Sturgeon*  
**SCI Alaska Chapter President**  
 E-mail: [president@aksafariclub.org](mailto:president@aksafariclub.org)  
 Cell: (907) 230-0072

*Safari Club International Alaska Chapter*  
*First for Hunters - First for Wildlife*

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Wp22-08 wp22-07**

isaiah Sipniewski &lt;stansipak@gmail.com&gt;

Thu 7/15/2021 8:09 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello,

I'm writing this email in regards to the recent proposals for restrictions on harvesting deer in the above subject line.

As a Juneau resident of 20 years I have enjoyed hunting these areas on chichicoff Island and the south end of admiralty Island.

I have a family cabin on admiralty at the southern end where dating back as far as my wife's grandfather, has used for hunting deer.

There is no decline in deer population and no reason why this area should be restricted to Juneau hunters. There are more than enough deer for those who choose to "break suction from there truck or boat seat" and hike to find deer.

I have family in hoonah who I have enjoyed staying with and hiking the mountains together. Taking my sons and teaching them how to navigate the mountains. On the road systems in hoonah I have enjoyed hiking to my favorite spots for as long as ive lived in Alaska.

I see no good reason why any of the 3 proposals should even be on the table.

If people are complaining of not enough deer it is due to their own laziness and unwillingness to hike into the woods for deer. There are more than enough for the surrounding residents and residents of Juneau.

Thank you for taking my comments into consideration.

Stanley sipniewski

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAN%...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-07**

Scott Spickler &lt;sspickler@gmail.com&gt;

Mon 7/19/2021 10:21 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

I would like to urge you to not take action to implement these new regulations and suggested guidelines to ban non subsistence hunters in this region.

This is the first I have heard of these proposals and feel that you have not done a good enough job publicizing these policies to allow more hunters to respond.

The fish and wildlife in Alaska belong to all of us and you are tipping the scales to a select number of hunters to the detriment of all Alaskans and where will it ever end? Is the east side of Northern Admiralty island next?

This proposal is divisive and unnecessary and should be abolished.

Thank you,

Scott Spickler  
10754 Horizon Dr  
Juneau, AK. 99801

Sent from my iPad

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQABH...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Subsistence Hunting Closure**

Peter Strow <pstrow@hotmail.com>

Mon 7/19/2021 5:20 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Hello,

I would like to submit a commit regarding the closure of hunting to Juneau residents for WP22-07, WP22-08 and WP22-09. I don't believe these areas should be closed to Juneau hunters. Accessible hunting is difficult in Southeast Alaska and many Juneau residents depend hunting deer in these areas. Proposing these closings should be backed by scientific data and I think this needs to be further studied before any closures are passed.

Thank you,  
Peter Strow

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAE3q...> 1/1



July 16, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
 Office of Subsistence Management  
 1011 East Tudor Road, MS-121  
 Anchorage, AK 99503-6199

RE: Comments on WP22-07 Closure to non-Federally qualified users, Admiralty Island; WP22-08 Place a harvest restriction on non-Federally qualified users, Northeast Chichagof Controlled Use Area; WP22-09 Closure to non-Federally qualified users, Lisianski Strait; WP22-10 Lower harvest limits for non-Federally qualified users, Lisianski Strait;

Dear members of the Federal Subsistence Board:

The Sportsmen's Alliance is a leading national organization that defends the right of our members to hunt, fish and trap in all 50 states. I am writing today to urge you to use sound scientific evidence to discharge policy related to changing existing hunting seasons, harvest limits and methods and means of taking wildlife related to federal subsistence hunting and trapping and more specifically proposals WP22-07, WP22-08, WP22-09 and WP22-10.

The Sportsmen's Alliance strongly believes that if populations are abundant than all public land users in the Alaska should have access to these lands for hunting and trapping. These lands are managed and conserved using public funds contributed by sportsmen across Alaska and the United States through license fees and excise taxes paid on the purchase of firearms and other hunting equipment.

When determining whether to close certain federal lands to land users that are non-subsistence hunters, the Alliance on behalf of our Alaska members urge you to follow scientific evidence and population data to determine the best course of action. If wildlife populations numbers indicate abundant numbers of game species these lands should remain open to both subsistence hunters and non-subsistence hunters. The North American Model of Wildlife Conservation dictates that science should be the guiding tool for discharging wildlife policy and our membership stands firmly on the principles of this model.

We understand the complex nature of this decision, so we urge you to make these determinations based solely on science and not based on political or social pressure. Thank you for the opportunity to comment on this issue and thank you for your time.

Best,

Jacob Hupp  
 Sportsmen's Alliance  
 Associate Director of State Services

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Opposition**

Luke N. Taintor <ltaintor@bartletthospital.org>

Mon 7/19/2021 2:45 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I oppose the new regulations on that subsistence hunters are making that drastic of an impact on the deer population numbers. The numbers don't support the claims. Thank you for your time

My house rules are be kind yourself, be kind to others, and be kind to nature. I hope you guys make the right choice.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAHAga...> 1/1



7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Opposition to WP22-07, WP22-08, WP22-09**

Brandon Ivanowicz &lt;blvanowicz@pndengineers.com&gt;

Mon 7/19/2021 4:11 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Attention: Theo Matuskowitz

The intent of this email is to be on record in my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

I support the views of the Territorial Sportsmen, Inc. of Juneau and the Alaska Department of Fish and Game in their opposition to these proposals. Please see the attachment. Thank you. Brandon Ivanowicz.

[There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQPEP...> 1/1

 Navigation

# Territorial Sportsmen

Representing the sporting lifestyle of Southeast Alaskans

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## There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters!

Posted on July 17, 2021 by territorialsport in Homepage

Comments on these are due by this Monday, July 19, 2021 (email: [subsistence@fws.gov](mailto:subsistence@fws.gov) or fax: 907-786-3898).

**The first proposal (WP22-07) is a closure of most of west Admiralty Island September 15 – November 30 for Juneau hunters. This includes all areas south of Hawk Inlet. Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

*TSI opposes this proposal and respectively asks that it not be adopted.*

7/21/2021

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

**The second proposal (WP22-08) reduces the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA – Hoonah & Tenakee areas). Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

*TSI opposes this proposal and respectfully asks that it not be adopted.*

**The third proposal (WP22-09) is a closure of Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island October 15 – December 31. Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-09) to close deer hunting in Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island from October 15 to December 31 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort has remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

<https://territorialsportsmen.org/there-are-three-federal-subsistence-wildlife-proposals-being-considered-that-will-affect-juneau-deer-hunters/>

2/4

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

Dillon Tomaro &lt;dillonpaultomaro@gmail.com&gt;

Mon 7/19/2021 9:06 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this proposed change to the 2022 regulations. I have been hunting south of Hawk Inlet towards and beyond Angoon my whole life and I have not witnessed any decrease in deer population other than the years following an excessive amount of snow that caused the yearlings to die. I have had nothing but pleasant encounters with the hunters of Angoon and they always seem to kill more deer than us at ease with their local knowledge (same concept that I would have a better knowledge of the landscape, and therefore the upper hand with hunting in the Barlow area). That is some of my favorite hunting territory with all of the old growth that you cannot find north of Hawk Inlet. I also enjoy hunting Florence Lake which would be affected by this proposal. Rarely do I encounter other hunters from Juneau when I am hunting South of Hawk Inlet and I believe this should be easy to see by looking at peoples hunting reports. I do not think that the Juneau residents' impact on the deer population south of Hawk inlet is significant at all and there is no way that it is hurting the Angoon residents' harvest needs. If this proposal goes through then to be fair, the Angoon residents should not be able to hunt north of Hawk Inlet (even though it is the same case that their hunting has no impact on Juneau residents deer population). There has been no problem in the past with Juneau residents affecting the Angoon residents hunting opportunity and I believe it is simply unfair to go through with this proposal.

WP22-08

I oppose this proposed change to the 2022 regulations. I believe that again the Juneau resident impact is very low in this area.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

Thank you for taking the time to read my comments.

Dillon Tomaro

Lifelong Southeast Alaska Hunter

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAF0R...> 2/2

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comment on WP22-08, WP22-09, WP22-07**

John Unzicker &lt;jmunzicker@gmail.com&gt;

Wed 6/30/2021 8:56 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Hello,

This comment is regarding the following proposals:  
WP22-08, WP22-09, WP22-07

We are all Alaska state residents and have the right to utilize all of the state land regardless of our primary residence. As a lifelong Juneau resident who pays the same fees to hunt game in SE AK as anyone else in the state, I am extremely discouraged by these proposals.

Juneauites would be forced out of major hunting areas during the prime time of the season. If Juneau residents are not allowed to hunt the far, outlying areas, we will all be forced to hunt the immediate areas around Juneau which will result in over-hunting, overcrowding, and less game around Juneau. This proposal is absolutely inequitable and will divide communities.

What about hunters who have cabins or family in Hoonah, Pelican, or Angoon? This is absolutely wrong and only goes to serve a very small population of the state. Residents of Juneau have just as much right to hunt these zones as the residents of Hoonah, Pelican, and Angoon have the right to hunt anywhere in the state. There is enough wildlife and land for everyone to utilize for subsistence and it should be shared equally.

And does this mean that any other resident not from Juneau can hunt these areas? Sitka? Haines? Gustavus? Petersburg? Why only Juneau?

Thank you,  
John Unzicker  
2016 Glacier Bear Blvd.  
Juneau, AK. 99801  
907-723-3191

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAMTa...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Public comment on WP22-07**

akmac93@gmail.com <akmac93@gmail.com>

Mon 7/19/2021 8:30 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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This email is in relation to proposal WP22-07.

I strongly feel that this proposal will greatly diminish non-subsistence use of the unit. Furthermore deer populations and animal take are both robust In the proposed area, there is ample deer for both user groups participating in the take of deer.

I Mac Wilson oppose WP22-07

Thank you for your consideration.

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAEkfs...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] proposals WP22-7, WP22-8 and WP22-9

Luke Woodruff <alaskan\_waters@yahoo.com>

Wed 6/30/2021 9:23 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Please do not consider the new proposals WP22-7, WP22-8 and WP22-9 as new regulation. I do not believe the current deer harvest levels combined with predation/winter kills deem this kind of proposal necessary. Subsistence and non subsistence communities alike count on deer as a part of their diet along with fish, water fowl and berries. Every year is different, sometimes hunting is difficult and other times not. Let's avoid creating regulations that favor one group over another because one group thinks they are having to work harder.

Luke Woodruff  
Juneau, AK

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQANW...> 1/1



<b>WP22-08 Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP22-08 requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer. <i>Submitted by: The Southeast Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Unit 4 - Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31</i></p> <p><b><i>Non-Federally qualified users are limited to 2 male deer in the Northeast Chichagof Controlled Use Area</i></b></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>44 Oppose, 2 Neutral</b>

**DRAFT STAFF ANALYSIS  
WP22-08**

**ISSUES**

Wildlife Proposal WP22-08, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer.

**DISCUSSION**

The proponent states that it recently became more challenging for subsistence hunters in Hoonah to harvest sufficient deer to meet their subsistence needs due to increased hunting pressure from non-Federally qualified users. They state that regulatory change is needed to protect the deer population from further depletion and increase opportunity for Federally qualified subsistence users.

**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.*

***Non-Federally qualified users are limited to 2 male deer in the Northeast Chichagof Controlled Use Area***

**Existing State Regulation**

**Unit 4 - Deer**

*Chichagof Island east of Port Frederick and north of Tenakee Inlet*

<i>Residents and Nonresidents -</i>	<i>Bucks</i>	<i>HT</i>	<i>Aug. 1 - Sept.14</i>
<i>3 deer total</i>	<i>Any deer</i>	<i>HT</i>	<i>Sept. 15 - Dec. 31</i>

## Unit 4 - Deer

### *Remainder*

*Residents and Non-residents  
- 6 deer total*

*Bucks*

*HT Aug. 1 - Sept. 14*

*Any deer*

*HT Sept. 15 – Dec. 31*

## Extent of Federal Public Lands

Unit 4 is comprised of approximately 96% Federal Public Lands and consists of 95% U.S. Forest Service (USFS) managed lands and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (**Map 1**).

## Customary and Traditional Use Determination

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

## Regulatory History

See WP22-07.

## Biological Background

See WP22-07.

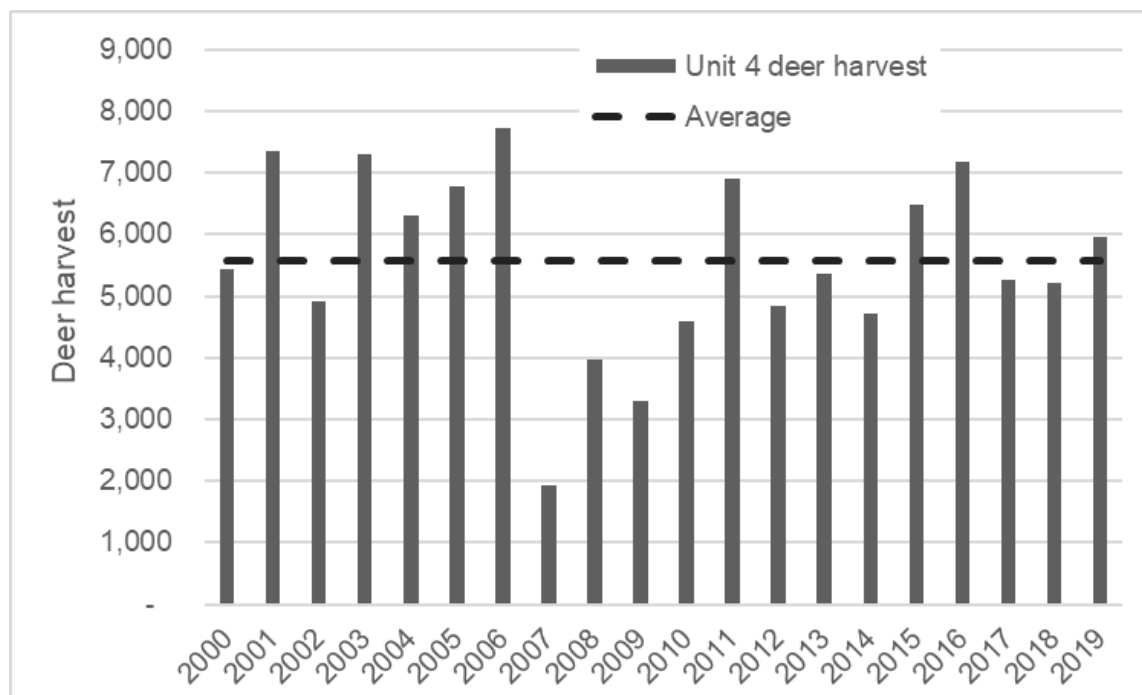
## Habitat

See WP22-07.

## Population Information

McCoy (2017) outlines the limitations of estimating deer populations, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall. McCoy (2019) explained that Unit 4 deer pellet-group counts in 2019 were higher than previous counts in all three survey areas. Pavlov Harbor, within the proposal analysis area (**Map 1**), was surveyed in 2019. Results indicate a 39% increase in pellet-groups from the last survey conducted in 2010 (McCoy 2010).

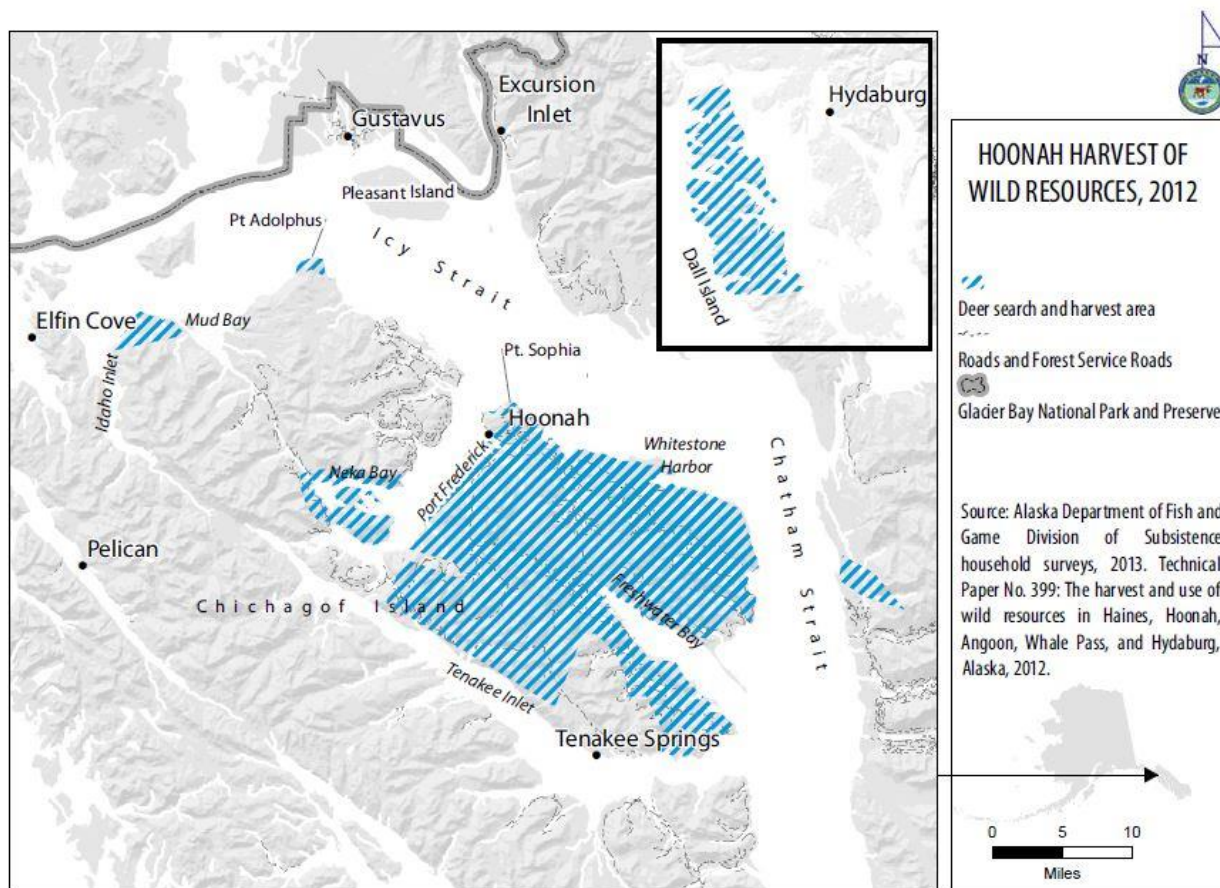
Annual harvest is one indication of deer population status. The average annual legal deer harvest in Unit 4 is 5,579 (**Figure 1**). Deer harvest was below average in 2007-2010, probably due to high deer mortality from several consecutive harsh winters. Unit 4 annual deer harvest has increased to pre-2007 levels, suggesting that the Unit 4 deer population has recovered from those harsh winters.



**Figure 1.** Unit 4 estimated annual legal deer harvest, 2000-2019.

**Cultural Knowledge and Traditional Practices**

Deer are an important subsistence resource for rural residents throughout southeast Alaska. In a 2012 survey of Hoonah residents, 59% of households reported attempting to harvest deer, 48% of households reported successfully harvesting deer, and 77% of households reported using deer (Sill and Koster 2017). An estimated 470 deer were harvested, for a total of 37,558 pounds, or 51 pounds per capita. The deer hunting areas documented in the survey were primarily northeast Chichagof Island east of Port Frederick and north of Tenakee Inlet (**Figure 2**). Sill and Koster (2017) also report that Hoonah respondents expressed concern about deer populations and harvests. Some respondents expressed concern that non-local hunters were taking too many deer and causing competition from over-crowding in the local areas and roads.



**Figure 2.** Reported deer hunting locations used by residents of Hoonah in 2012. From Sill and Koster 2017.

Hoonah and nearby communities maintain strong ties to Juneau as a commercial and economic hub, and many rural residents of the area move to Juneau for economic opportunities. Hoonah is the most populated place in the Hoonah-Angoon census area. The population has been stable since 2000 and was 782 in the 2019 census (Sill and Koster 2017; Alaska Department of Labor and Workforce Development 2020). Based on year-to-year changes in residency of Permanent Fund Dividend applicants, an average of 61 residents of the Hoonah-Angoon census area moved to Juneau each year between 2009 and 2020, while an average of 47 moved from Juneau to the Hoonah-Angoon census area (Alaska Department of Labor and Workforce Development 2021).

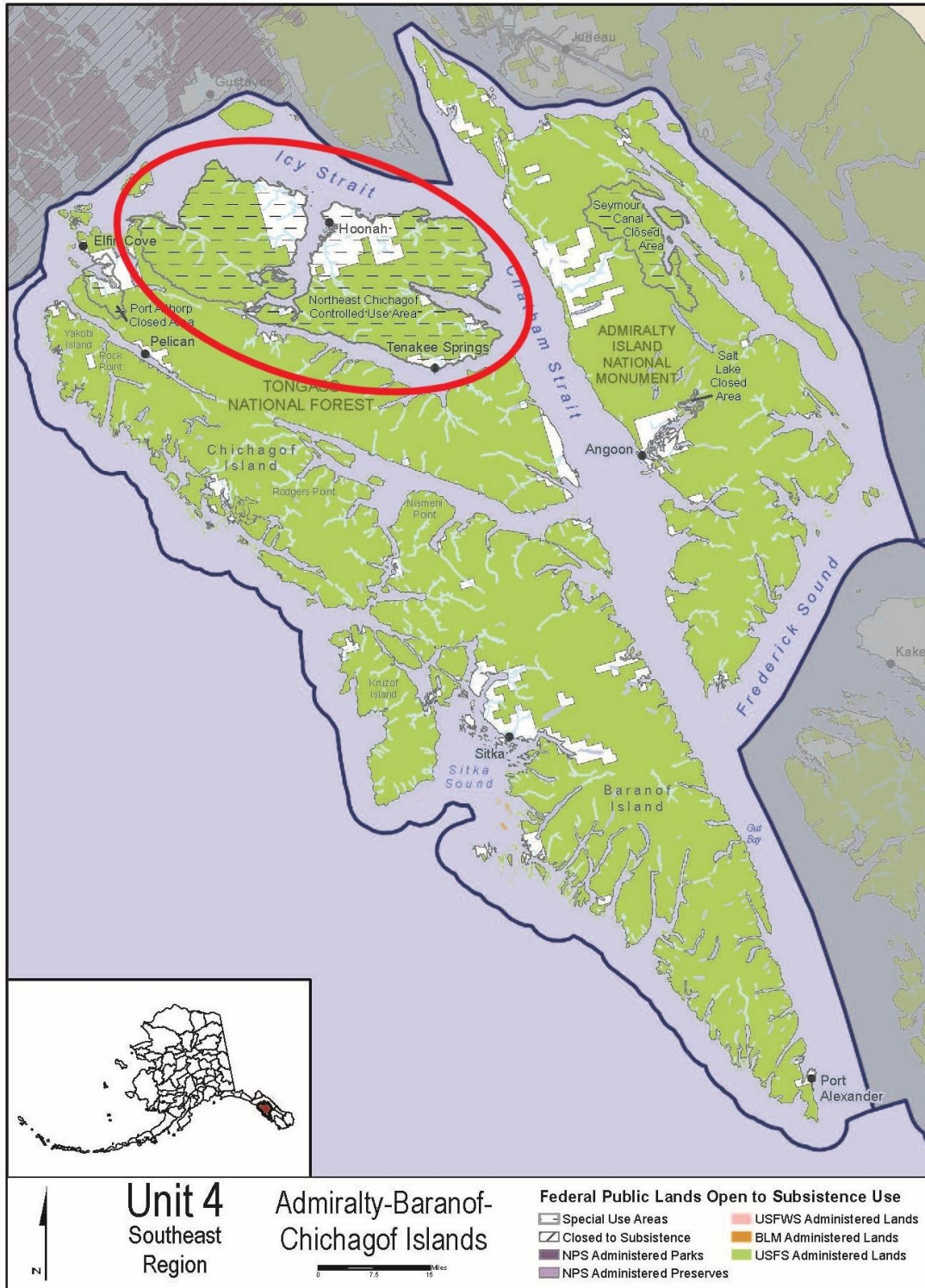
### Harvest History

Through 2010, deer harvest data provided by the Alaska Department of Fish and Game (ADF&G) are based on a sample of hunters. In general, 35% of hunters from each community are surveyed each year and, while response rates vary by community, the overall response rate across communities is approximately 60%. Harvest numbers are extrapolated using expansion factors calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response is low from a community, an individual hunter may have a disproportionate effect

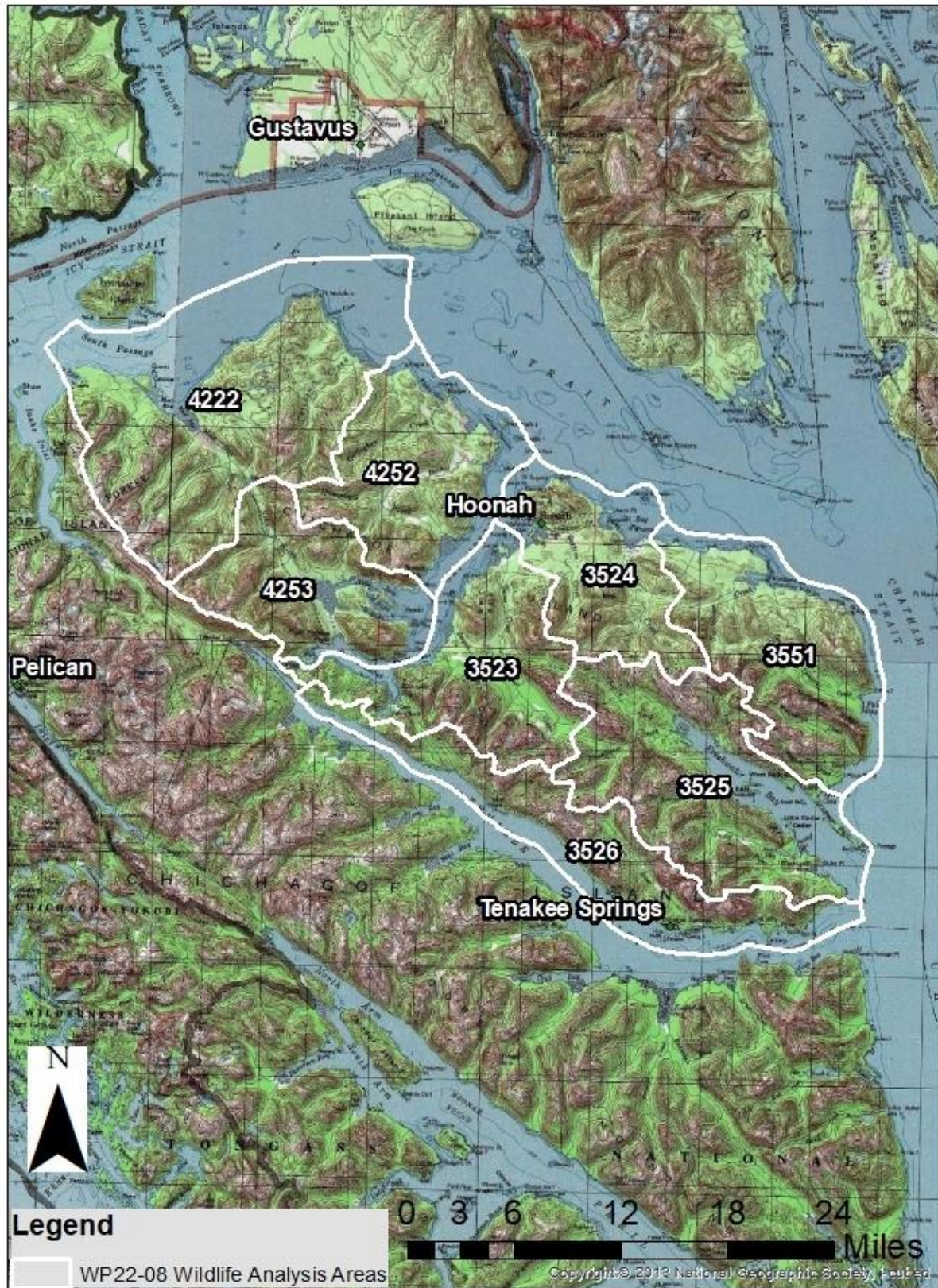
on the data. As confidence intervals are not available for these data, exact numbers should be considered estimates and used with caution. Trends, however, especially at larger scales, should be indicative of general population change. Since 2011, harvest data have been gathered through mandatory reporting. ADF&G expands the harvest estimate based on the number of reports returned to account for unreturned harvest reports (Bethune 2020).

Deer harvest in Unit 4 in 2007/08 ( $1,858 \pm 236$ ) was down significantly from 2006/07 ( $7,746 \pm 594$ ) and was the lowest harvest in Unit 4 in over a decade due to significant mortality from preceding severe winters (McCoy et al. 2007). Prior to 2007/08, Unit 4 deer harvest was mostly stable, fluctuating around 7,000 deer. Harvest data indicates that the annual Unit 4 deer harvests increased beginning around 2008-2009 and was 5,969 in 2019 (**Figure 1**).

The proposal analysis area for WP22-08 relative to Unit 4 is shown in **Map 1**. The harvest data presented is specific to wildlife analysis areas (WAA) encompassing the area of northeast Chichagof Island north of Tenakee and Idaho Inlets, collectively called NECCUA (**Map 2**).



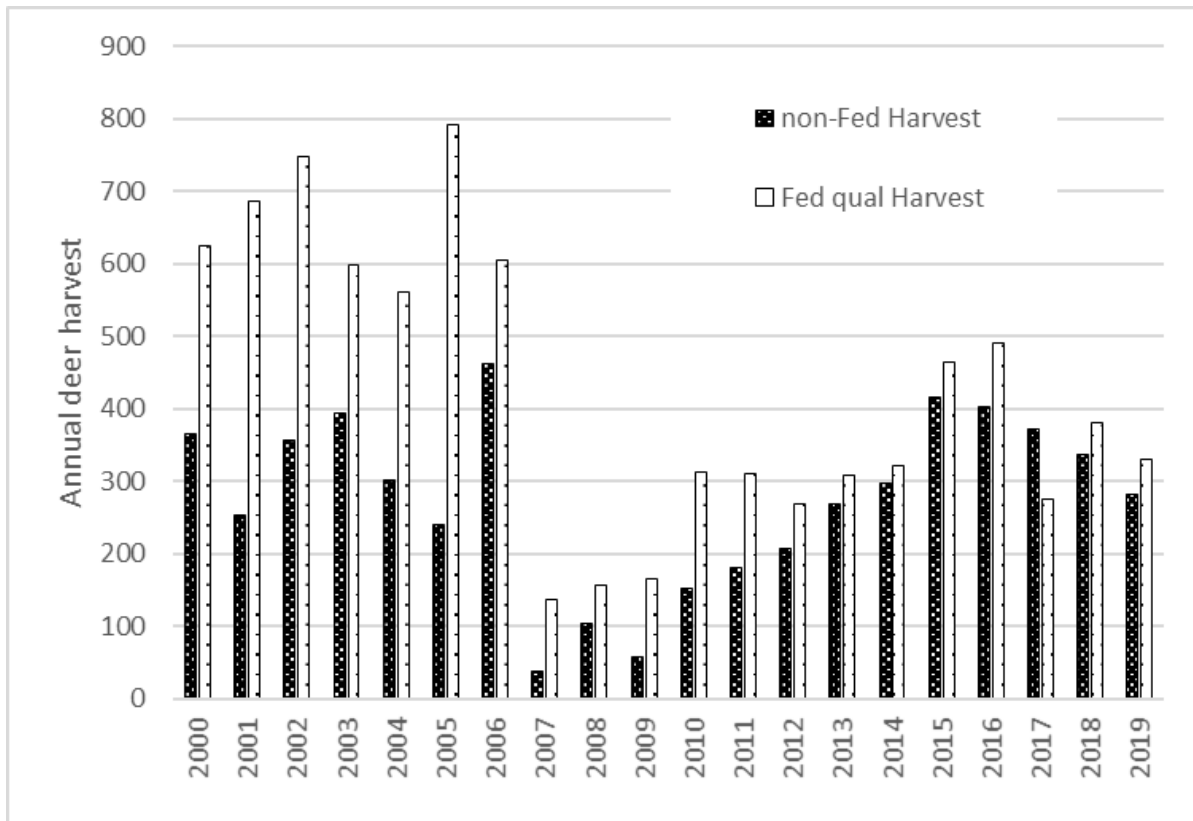
**Map 1.** Unit 4 management map with proposal analysis area (NECCUA) encircled in red.



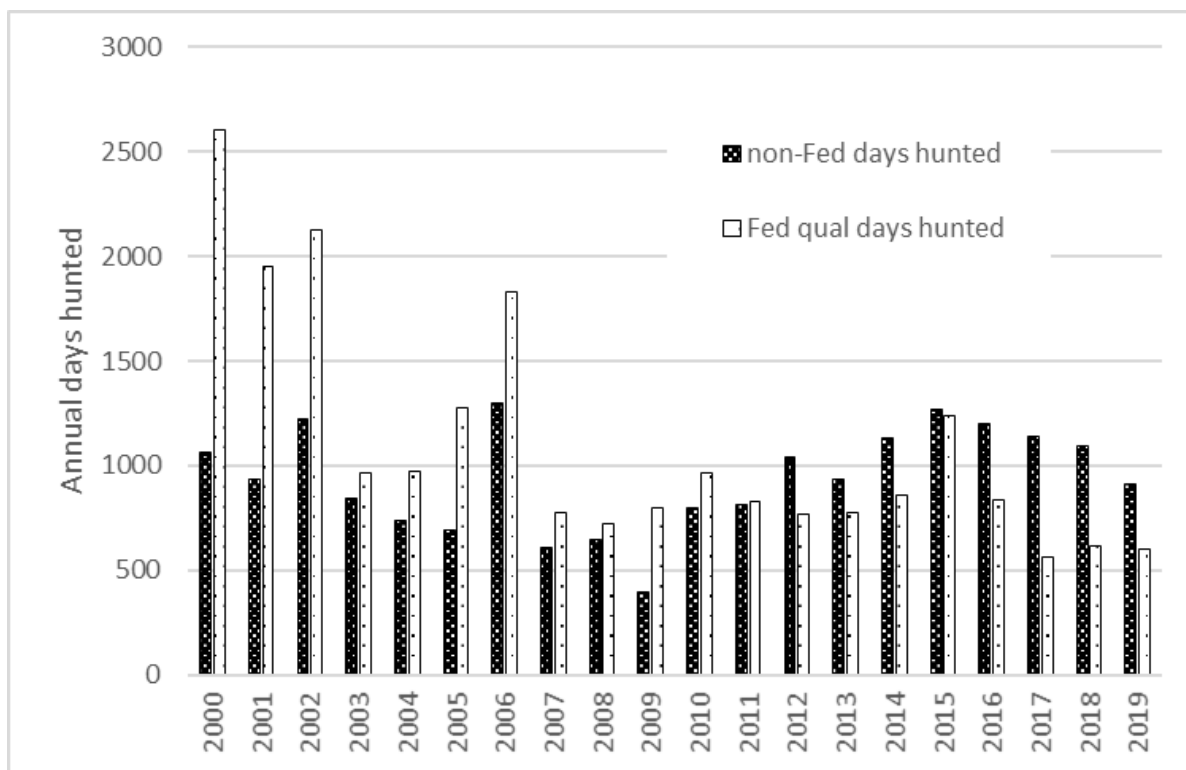
Map 2. Wildlife analysis areas (NECCUA) used for harvest and effort data analysis.



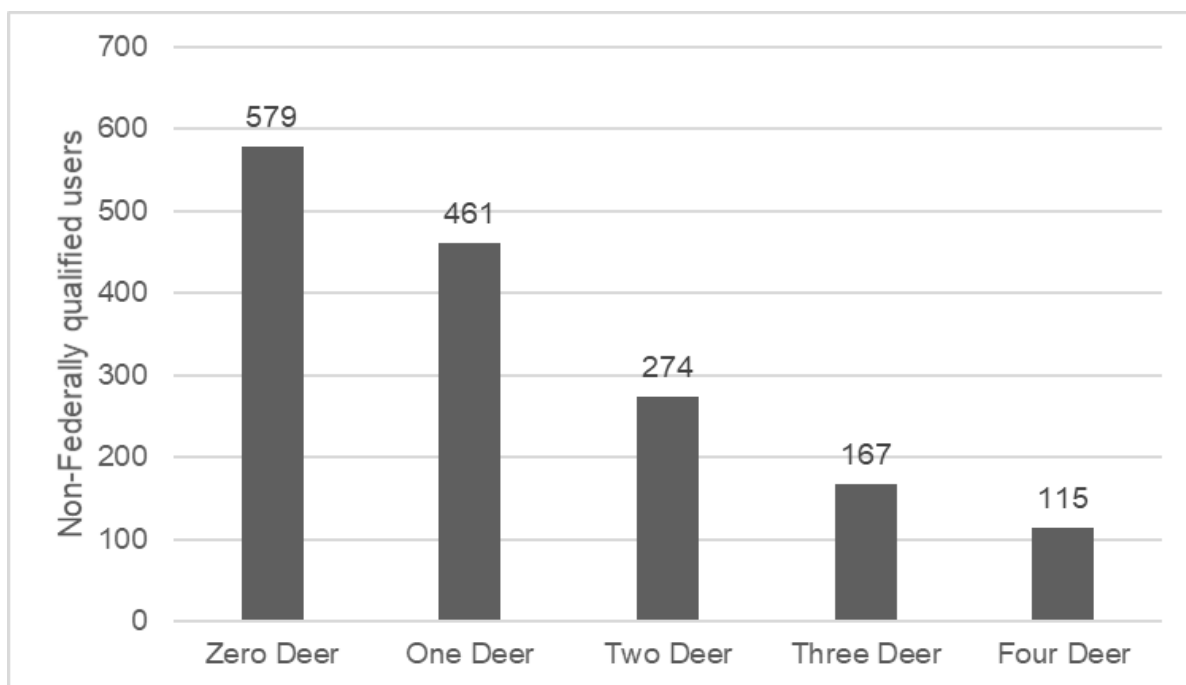
Harvest and effort by Federally qualified subsistence users and non-Federally qualified users in the relevant WAAs is presented in **Figures 3** and **4** below. Federally qualified harvest is higher in most years compared to other users (**Figure 3**) while effort, expressed in hunter days, is generally lower (**Figure 4**). Non-Federally qualified users have a lower success rate which results in higher hunting effort compared to Federally qualified subsistence users. Between 2007 and 2019, Federal subsistence harvest increased to a high in 2016 before dropping slightly (**Figure 3**). Over the same period, effort in days hunted appears to be decreasing from a high in 2015, with Federally qualified subsistence user hunt days dropping the most. Eighty-two percent of non-Federally qualified users harvest 2 deer or less annually from Unit 4 (**Figure 5**). Female deer harvest by non-Federally qualified users has averaged 17% since 2000, with a peak of 33% in 2017 (**Figure 6**).



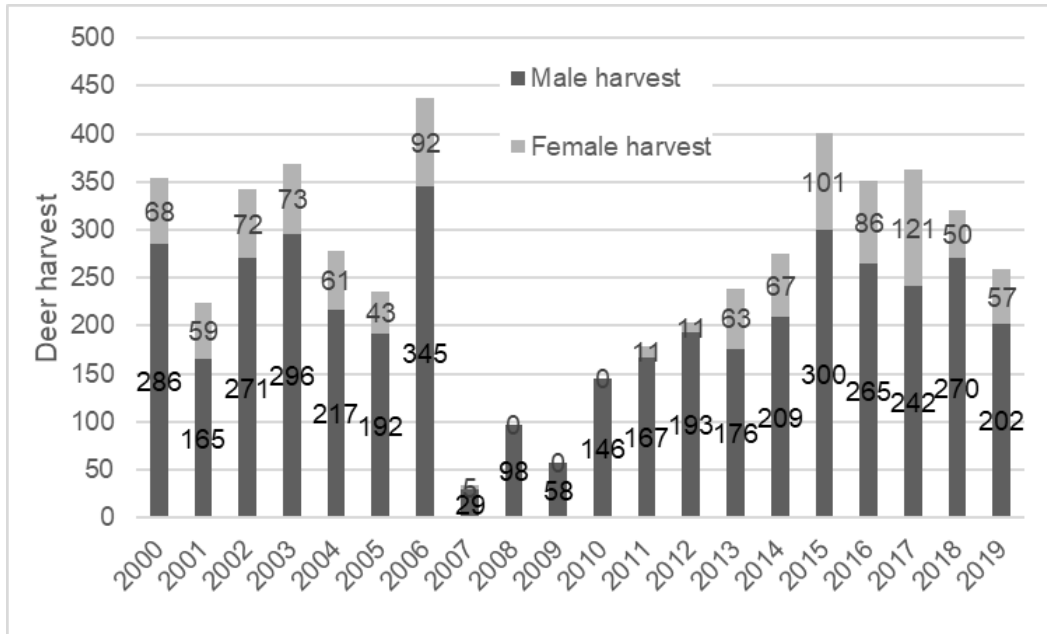
**Figure 3.** Annual deer harvest in the proposal analysis area, 2000-2019 (ADF&G unpublished data).



**Figure 4.** Annual effort, in hunter days, in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

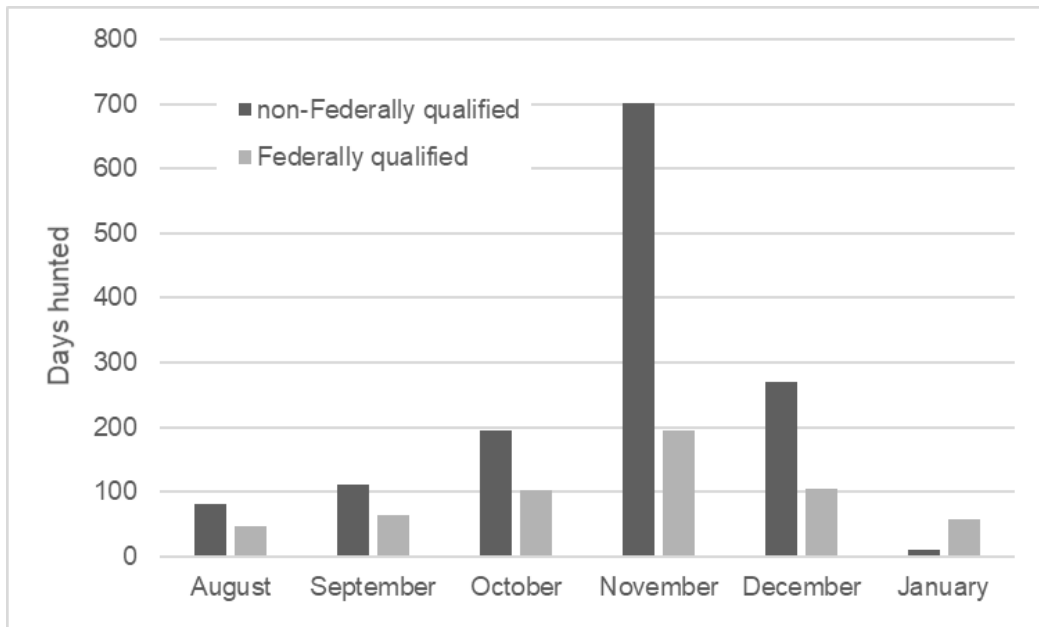


**Figure 5.** Average number of non-Federally qualified users harvesting 0-4 deer annually in Unit 4, 2000-2019 (ADF&G unpublished data).



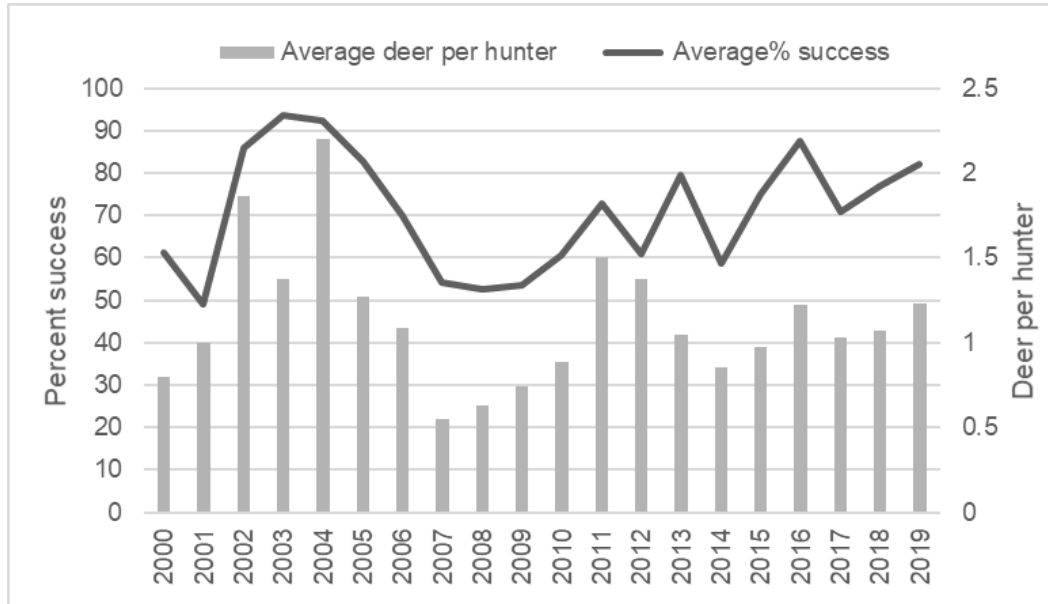
**Figure 6.** Number of male and female deer harvested by non-federally qualified users in NECCUA, 2000-2019. Female deer harvest was restricted 2007-2012. (ADF&G unpublished data).

The chronology of deer hunting effort in all of Unit 4 is probably similar to effort in the proposal analysis area, varying by user group. November is the most popular hunting month for both groups, particularly for non-Federally qualified users (**Figure 7**).



**Figure 7.** Average number of days hunted annually by Federally qualified subsistence users and non-Federally qualified users in Unit 4, 2000-2019 (ADF&G unpublished data).

Hunter success rate and the number of deer harvested per hunter, are indicators of whether user nutritional needs are being satisfied. For data management purposes, a hunt is considered successful when any number of animals is harvested on a single hunt. The success rate for residents of Hoonah and the number of deer per hunter has been trending up since 2009 (**Figure 8**).



**Figure 8.** Hunter success rate and deer harvested per hunter for Hoonah residents hunting in Unit 4, 2000-2019 (ADF&G unpublished data).

**Effects of the Proposal**

This proposal would restrict non-Federally qualified users on Federal public lands within the NECCUA by limiting harvest to two male deer. Restricting non-Federally qualified users could decrease both deer harvest and competition with Federally qualified subsistence users in the area. Lower harvests by and competition with non-Federally qualified users may result in more deer harvested by Federally qualified subsistence users. Non-Federally qualified users may shift some effort to areas of Unit 4 outside of NECCUA, possibly displacing hunters in other areas. Non-Federally qualified users may also concentrate more efforts on the State managed lands within the NECCUA, including lands immediately surrounding Hoonah. However, considering that very few non-Federally qualified users harvest more than two deer in Unit 4, and most of the deer harvested within the analysis area are males, this restriction would probably have little impact on the hunting effort, location, or harvest of non-Federally qualified users within the analysis area.

**OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP22-08.

## Justification

Section 802(2) of ANILCA requires that subsistence uses by rural residents of Alaska shall be “the priority consumptive uses of all such resources on the public lands of Alaska.” Section 804 provides a preference for subsistence uses, specifically “...the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes.” Section 815(3) provides that the Board may restrict nonsubsistence uses on Federal public lands if “necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law.”

Restricting non-Federally qualified users to two male deer annually in the proposal area does not appear necessary because deer populations in Unit 4 are high and may be approaching carrying capacity in some locations.

Restricting non-Federally qualified users to two male deer annually in the proposal area does not appear necessary for the continuation of subsistence uses. The average annual success rate for Hoonah deer hunters has been increasing since 2008 and the deer harvested per hunter had rebounded to pre-2007 levels. Further, few non-Federally qualified users harvest more than 2 deer in Unit 4 and they harvest primarily males in the analysis area; therefore, the proposed restriction is not likely to significantly affect effort by non-Federally qualified users or the hunting experience of Federally qualified subsistence users.

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## WRITTEN PUBLIC COMMENTS

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Alaska Outdoor Council comments - 2022-2024 Wildlife Proposals

Rod Arno <rodarno@gmail.com>

Mon 7/19/2021 12:23 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>

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

Alaska Outdoor Council  
310 K Street, Suite 200  
Anchorage, Alaska 99501  
July 19, 2021

RE: Public comments for FSB 2022-2024 Wildlife Proposals

The Alaska Outdoor Council (AOC) is a Statewide coalition of individual members and clubs representing 10,000 Alaskans who hunt, trap, fish and recreate on public lands/waters in Alaska. AOC Club Representative have participated in the regulatory process of managing and allocating fish and game in Alaska since before statehood in 1959.

Numerous proposals submitted by Federal Subsistence Regional Advisory Councils, federally recognized subsistence communities, and individuals confirm the fears that many AOC Representatives had at the time of the passage of Alaska National Interest Lands Conservation Act (ANILCA) 1980. Dual management of who can harvest game depending on whether you are on state public and private lands or if you are on federal lands was not the intent of Congress when they passed ANILCA.

AOC opposes WP22-07, WP22-08, WP22-09.  
Alaska Department of Fish & Game data should not invoke a complete closure to non-Federally Qualified Subsistence Users under Section 804 of ANILCA. Even the 9th Circuit Court, *Ninilchik Traditional Council v. U.S.*, 227 F.3d 1186 in 2000 understood the priority given in Title VIII of ANILCA was not absolute.

AOC opposes WP22-15.  
Congress's findings and declaration in Sec. 801 of ANILCA should leave no room for regulatory action by the Federal Subsistence Board (FSB) regarding anti-trapper claims. Sec. 801(3) of ANILCA should have the FSB concentrating only on "remote federal lands", as was the intent of Congress when they passed 802(2) of ANILCA.

AOC opposes WP22-16 thru 22.  
Providing a priority for some individuals or communities to harvest game on federal public lands located on the Kenai Peninsula only exacerbates the conflict between federally qualified hunters and Alaskans living in non-federally qualified areas of the state. Both groups of hunters are similarly situated.

AOC opposes WP22-32.  
It would be in Alaskan's best interest if the FSB would reduce the number of Alaskans allowed a priority to harvest game on federal lands just based solely on where they live, not how.

Thanks for the opportunity to provide public comments,

Rod Arno, Public Policy Director  
Alaska Outdoor Council

Sent from Rod Arno's iPad.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAL9rk...> 1/1

To Whom It May Concern,

I am writing today thankful for the opportunity to voice my opinion regarding the following proposals.

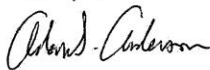
**WP22-07** - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where Juneau residents even on a good weather day cannot reach. It will confine hunting areas to Juneau residents which will increase pressure on already overcrowded areas furthermore helping to create unsafe scenarios. It is discriminatory, unethical, and does not show good land management for the "American people" rather it divides and polarizes Alaskans in the region.

**WP22-08** – I hope this is not a biased proposal toward Juneau hunters and is actually based on science relating to current deer populations. How did we go from 6 to 2? Snow and ice lead to winter die off which effects overall deer populations not hunters.

**WP22-09** - Rural hunters outside of Juneau already have the benefit of a longer harvest period. Just because our jobs and lives are based in Juneau does not mean we want the high cost of inferior meat from Costco.

In closing please do not take away these beautiful places to Juneau residents limiting our access to the outdoors, feeding our families, and the social benefits hunting brings us.

Thank you



Adam S. Anderson



Mike Bethers  
 P.O. Box 210003  
 Auke Bay, AK 99821  
 (907)-321-1186  
[mikebethers@gmail.com](mailto:mikebethers@gmail.com)

June 22, 2021

Theo Matuskowitz  
 Federal Subsistence Board  
 Office of Subsistence Management  
 1011 East Tudor Road, MS-121  
 Anchorage, AK 99503-6199

Re: Wildlife Proposals 22-07, 22-08, and 22-09

Dear Mr. Matuskowitz:

Please include these comments in the public record. Please give a copy to each board member.

Subsistence deer hunters (Federally Qualified Users or FQUs) from Angoon, Hoonah and Pelican are claiming that non-subsistence deer hunters (Non-Federally Qualified Users or NFQUs) are out competing them for blacktail deer. Village residents are federally qualified and already have priority use of the deer resource as their season runs through January 31, while the NFQU season ends December 31.

The Southeast Alaska Subsistence Regional Advisory Council has developed three wildlife proposals – 22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican – to address claims that NFQUs are responsible for reduced subsistence harvests in these villages. These proposals are based only on comments from villagers and are not based on any actual data or documented observations.

Based on my personal observations made deer hunting in Northern Southeast Alaska over the last fifty years and findings of the Alaska Department of Fish and Game (ADF&G) harvest studies, these proposals can not be justified in any way and should not be adopted.

I have been a lifelong deer hunter and am over seventy years old. The last several years I've spent more than fifty days in the woods annually, and for the last fifty years, my hunting has been in Northern Southeast Alaska; I've hunted in all areas included in these proposals. I can still get up the mountain farther than I can get a big buck out of the woods and am very selective of what I harvest and where. I use a boat to access my hunting areas and do a lot of calling and don't hunt from drivable roads. I haven't been on the Hoonah road system in decades. Every year I let many deer walk away rather than shoot them and have absolutely no problem getting enough deer to meet my family's needs.

Theo Matuskowitz

June 22, 2021

Page 2

**Following are comments that apply to all three proposals (22-07, 22-08, and 22-09)**

FQUs already have priority to deer as they can hunt through January when deer are often most available while NFQU's season ends December 31.

The winter of 2007-2008 saw a record high snowfall throughout Northern Southeast Alaska and as a consequence, deer were driven to the beach in numbers not seen since. They were at the peak of availability. Since the winter of 2007-2008 there has been less snowfall and deer have not hit the beach in numbers seen during the 2007-2008 winter. In the last three to four years there has been less snow and more rain. Deer have not herded up on the beach much and it has been more miserable to hunt in the rain but hunters I associate with, that like to hunt and eat venison, were out there hunting.

In the areas I've hunted the last ten years, I have seen fewer hunters than in earlier years.

Since the deer killing winter of 2007-2008, the deer populations in all three areas have rebounded and currently are at or near all time highs.

#### **Comments on 22-07 Admiralty**

This proposal would essentially close federal lands from Pt. Marsden to Pt. Gardener to deer hunting by NFQUs from September 15 through November 30.

Most NFQUs from Juneau who hunt the West side of Admiralty usually turn around at Funter Bay or Hawk Inlet as there are few to no good anchorages south of Pt. Marsden. Also, the proposed closed area is too far from Juneau for day trips. It is my belief that most subsistence hunting from Angoon is done on the beaches, which are not included in this proposal as beaches are state land.

I know several NFQU hunting parties that hunt West Admiralty, mostly north of Pt. Marsden, and they are typically quite successful. I know of two parties of NFQUs that hunt out of Angoon and they always get their deer.

#### **Comments on 22-08 Hoonah**

Hoonah has really degraded local wildlife habitat through extensive clear-cut logging (which has been shown to significantly impact wildlife values over the long period) and the extensive road system (which has been shown to also reduce the area's wildlife values). The Hoonah road system has become a favorite place to conduct hunting by Hoonah residents, especially after doe season opens. Please note that reduced sailing schedules of the Alaska Marine Highway's ferries have reduced opportunity for NFQUs from Juneau to get to Hoonah to compete with local hunters.

Over the years, deer have adjusted to the heavy hunting pressure along the Hoonah road system. After a week or two of harassment by road hunters, surviving animals move away from the roadside. However, I know those that hunt in the woods accessed by the Hoonah road system have had no problem finding deer.

Theo Matuskowitz

June 22, 2021

Page 3

I have heard of two Hoonah residents who in the past typically shot many more deer than the limit, which would take deer away from other hunters.

Also please note that data shows there is minimal exchange of deer between the north shore of Tenakee Inlet and areas accessed by the Hoonah road system. The mountains on the north side of Tenakee Inlet serve as a dividing line for Tenakee Inlet deer and deer living north of the mountains in areas accessed by the Hoonah road system. Therefore, only areas accessed by the Hoonah road system on northeast Chichagof Island should be included in proposal 22-08 and the north shore of Tenakee Inlet should be excluded.

**ADF&G deer harvest and hunter effort data applies to all three proposals.**

1. Deer populations are at very high levels.
2. There have been substantial decreases in hunting effort by FQUs
3. There has not been any noticeable increase in hunting effort by NFQUs
4. The reduced number of FQUs still hunting are harvesting more deer than in the past.
5. There is simply no justification to support any of the three proposals.

**In conclusion**

There are very high numbers of deer available in all areas covered by these proposals, however, FQU hunters are no longer hunting. They are not taking advantage of the standard deer season (August 1 – December 31) or their priority opportunity of hunting through January. Deer are often most available during January, due to winter snow levels, etc.

Any restriction of NFQU deer hunting opportunity will not increase subsistence harvests in the villages. FQUs from the villages need to get out of the house and out of their vehicles and back into the woods to get their deer. They will have no problem.

Proposals 22-07, 22-08, and 22-09 are based on inaccurate beliefs of FQUs in the villages and lack any justification. Adoption of any of these proposals would be a needless and huge disservice to many hunters in northern southeast Alaska, hunting a strong public resource, on public lands.

Please reject (not approve) proposals 22-07, 22-08, and 22-09.

Thank you for the opportunity to comment.

Sincerely,

Mike Bethers  
Auke Bay, Alaska

Mike Bovitz

9500 N Douglas Hwy

Juneau, AK 99801

(907)723-2279

[Metalworks@gci.net](mailto:Metalworks@gci.net)

Theo Matuskowitz

Federal Subsistence Board

Office of Subsistence Management

1011 East Tudor Road , MS-121

Anchorage, Ak 99503-6199

Re: wildlife proposals 22-07, 22-08, and 22-09

Hello Mr. Matuskowitz:

I am NOT in support of the 3 wildlife proposals-22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican.

The rural subsistence deer hunters/Federally qualified users are claiming it is getting harder to fill their quota of deer. They are concerned about the potential of not enough deer for their personal use to live a subsistence living. There is no science based facts to what is being questioned or science based facts to what they are stating on the deer population.

Alaska fish and game do harvest studies, pellet counts, flights for deer etc, etc. This is all paid for by every Alaskan through tax dollars. Based on their science the number of deer is quite plentiful and Federally Qualified Users already have an extended season going through January 31<sup>st</sup>. Alaska fish and game last year allowed every resident 6 deer instead of the normal 4. Why would they do that if there was a resource problem?

The only thing that has changed over the past years is our weather pattern. Snow is no longer coming in and staying on the beach for long periods of time driving the deer to the beach. Which is a good thing because as those big snow falls happen mother nature NOT man takes over and the deer start to die .

Proposals 22-07, 22-08, and 22-09 are not science based, have no justification, and would be the wrong thing to do to many Southeast Alaska hunters, hunting a public resource.

Please REJECT and NOT APPROVE proposal 22-07, 22-08, 22-09

Thank you for your time,

Mike Bovitz

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] SE Deer Hunting**

Lee Bridgman &lt;Lee.aklife@outlook.com&gt;

Fri 7/9/2021 1:53 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

RE: proposed changes to deer hunting in Unit 4 are WP22-07, WP22-08, WP22-09, and WP22-10.

I myself do not hunt in the Southeast and do not believe the large numbers are making their way to hunt deer in this area. The cost of getting there compared to the game meat taken would make the trip counter productive. As for the Wanton Waste of game meat, I would believe that F&G would be very able to check vessels arriving in Juneau for proper care of the game meat.

The proposals will only further divide the user groups, which is not a desired result. If limits need to be reduced, for all, then so be it.

Do not proceed with these proposals.

Thank you,

**Lee H. Bridgman**

763 Wanda Dr  
North Pole, AK 99705

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhlWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAEEx...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public comment: Wildlife proposals 22-07, 08, 09

Kelly Cates <kacates@alaska.edu>

Mon 7/19/2021 9:31 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Dear Subsistence Management Board,

I am writing in opposition to wildlife proposals 22-07, 22-08 and 22-09. I am a SE hunter and my family regularly hunts in each of the proposed areas. We rely on subsistence meats to feed us through the year and enjoy the memories created from our hunting trips. It is unclear to me why these proposals were initiated as the data outlined in the packets suggests that deer populations are thriving and that FQU's are harvesting more deer than they used to. So if there are plenty of deer and enough for all users, why should one user group be excluded? Again, I oppose these proposals and hope the facts outlined in the information packets are fairly weighed in the boards decision.

Thanks,  
Kelly Cates

--

**Kelly Cates**, PhD Candidate  
College of Fisheries and Ocean Sciences  
Juneau Fisheries Division, University of Alaska Fairbanks  
[kacates@alaska.edu](mailto:kacates@alaska.edu) | (360) 620-5032

'May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view'



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments for WP22-07,8,9,10**

Matthew Catterson &lt;mattcatterson@yahoo.com&gt;

Fri 7/16/2021 4:30 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I am currently a resident of Juneau, but I have spent most of the past 15 years residing in the Southeast Alaska communities of Yakutat and Sitka. My time living, working, fishing, and hunting in these communities has engendered in me a great respect and connection to the subsistence lifestyle.

Because of my background, I can certainly empathize with the concerns presented by the authors of these proposals. However, the information provided in ADF&G Department comments is aligned with my experiences hunting in the proposal areas, which is that hunting effort in these areas is minimal and that competition between hunters is not responsible for trends of reduced deer harvest by FQUs or NFQUs. I believe it is widely accepted that environmental conditions (harsh winters), not hunting pressure, is the primary driver of deer abundance in Northern Southeast Alaska.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

As an alternative, I would not oppose regulatory changes that increase opportunity for FQU's while maintaining existing hunting opportunity for NFQUs. This type of regulatory change, coupled with ADF&G assertions that deer abundance is relatively stable in proposal areas, may achieve the increased harvest sought by proposal authors.

Thank you for your time and consideration of my comments.

**Matt Catterson, Douglas, Alaska**

<https://outlook.office365.com/mail/subsistence@fws.gov/deeplink?popoutv2=1&version=20210711001.05>

1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Unit 4 WP22-07, WP22-08, WP22-09, WP22-10 Proposed closure of Blacktail deer seasons to non-subsistence hunters**

Ken Couch <kc\_n\_gurls@yahoo.com>

Mon 7/19/2021 5:35 AM

To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

Cc: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to these proposals because there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence or even a reason to believe that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

I am getting tired of RACs, aided and abetted by the Subsistence Office of FWS Region7 continuing to waste public funds on these frivolous proposals to give federally-qualified subsistence hunters a private hunting club paid for by all Federal tax payers. Federal Regulations REQUIRE that the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof. Instead, all this is just wasting tax dollars. Maybe all the non-subsistence hunters should start making frivolous proposals that the RAC has to fight. Then maybe they would not have time to waste time and tax dollars on unsubstantiated claims.

Ken Couch

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAH...> 1/1



7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07/08/09

Elias Daugherty <elias1547@yahoo.com>

Mon 7/12/2021 4:39 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

I Elias Daugherty  
Oppose the proposal 22- 07/08/09  
The deer numbers show healthy and Sustainable.

I do think that nNon-residents becoming residents should have a stricter and longer qualification period  
For hunting  
Privileges  
Such as a 5 year stay required.

I also believe if there is a concern about deer numbers being taken that the price for non-resident deer tags should increase. And Stricter non-guided deer hunts.

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQANW...> 1/1

6/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-08

sam davis <ffdavis769@gmail.com >

Sat 6/19/2021 11:22 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I have an alternative to this proposal that would be a win win for everyone involved. Rather than limiting deer harvest limit to non subsistence hunters who still rely on that meat for filling freezers, why not increase predator control in the northeast chichagoff control use area. Hoonah has always had a history of brown bear problems in town. The first option would be to allow a brown bear every regulatory year. The second option would be allow land motor vehicles to be used in the taking of brown bear. Lower the number of bears in the area and raise the fawn survival rate. I hope you take this into consideration. Thank you for your time.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MMDNJZQAQABN...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

John Demuth &lt;jdemuth@pndengineers.com&gt;

Wed 6/30/2021 5:46 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Attention: Theo Matuskowitz

The intent of this email is to voice my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

The population of deer in these areas (as all areas in SE Alaska and Kodiak) has historically been impacted primarily by weather, and in particular the amount of snow experience in a given winter/early spring – NOT by the small percentage of hunters who may choose to venture further away from towns/areas with greater hunting pressure – i.e. Juneau. When heavy snow kills off deer, EVERYONE feels the impacts due to reduced numbers of deer.

W22-07 in particular is extremely exclusive and excessive as it covers over 70 miles of the west side of Admiralty Island – 40 miles north and 30 miles south. This is simple outrageous. NOBODY in Angoon hunts 30-40 miles from town, but rather they hunt primarily in Mitchell Bay due to the close proximity and favorable weather conditions – i.e. protected from high wind/waves. In addition, the vast majority of hunting pressure on the south end of Admiralty is from Petersburg and Kake hunters – who also qualify as subsistence hunters and hence will continue to compete with Angoon hunters – effectively changing nothing. The proposal clearly is intended to exclude Juneau hunters from hunting on the west side of Admiralty Island and will hence increase hunting pressure on the east side of Admiralty. The intent seems reasonable, but the range/area is far too large and should be reconsidered to be more focused on the immediate area around Angoon.

Thank you for your consideration.

- John DeMuth

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAAPd...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Public Comments Regarding Subsistence Management Program 2022-2024**

Jared Erickson &lt;erickson\_jared@yahoo.com&gt;

Sat 7/17/2021 7:43 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Public Comments Regarding Federal Subsistence Management Program 2022-2024:

WP22-07

WP22-08

WP22-09

WP22-10

Federal Subsistence Board-

I would like to take this opportunity to voice my opposition to the proposed changes to the above referenced deer hunting regulations in SE Alaska. To manage a population of a targeted animal species for harvest, I do believe it would be a mistake to consider anything other than the health of the population of that species. The ADF&G recently produced a comment response to the above proposed changes and the general trends show that there are fewer FQU's hunting, and they are hunting fewer days per year. The data also strongly suggested that the the Sitka Black Tail Deer populations in the areas referenced above are absolutely healthy and stable. That is, it has been a renewable source of food for all user groups for many years. The above proposals also do not take into account that deer at, or below, the mean high tide mark would still be eligible for harvest by the NFQU user group. I believe that this would actually make the concern worse due to the fact that all hunting efforts in these areas by NFQU's would be focused on the easier deer to harvest. If a NFQU is not allowed to harvest deer at elevation, or via flying into a lake that drains into these areas, the focus will shift to the deer near below the mean high tide level. This would generate the exact opposite effect as what is desired. I also believe it would be very hard to enforce the new proposals. The most concerning example I can think of is what will happen if a deer is shot below mean high tide, but then expires and is recovered above the mean high tide? A difficult scenario and one that invites controversy.

The above areas do have a natural barrier against too much traffic. For the months of concern, the population from Juneau must transit around Point Retreat and navigate Southern Lynn Canal to get to these areas if they are hunting by boat. This is the same body of water that will often prevent the Alaska Marine Highway System from making scheduled trips due to wave height and wind. The FQU's are positioned in the heart of the best hunting areas, giving them distinct geographic advantage.

If the true problem is FQU's not meeting their ANS, there are alternatives to the above proposals. Perhaps the Subsistence Board could consider subsidies to the FQU's in terms of fuel or equipment. Another option may be to liberalize proxy hunting for the communities in need. But if the real reason the FQU is experiencing a decrease in deer harvest rates has to do with fewer hunters putting in fewer days we should not penalize other user groups who use the same resource for the same reasons.

I have been a resident of Alaska my entire life, nearly 45 years, and Sitka Blacktail Deer from the regions above are an important part of calories for myself and my family throughout the year. I would like to voice my support for keeping the hunting regulations as they are and not preventing NFQU's the opportunity to continue to utilize this healthy, renewable source of food in our region.

Sincerely-  
Jared Erickson  
Juneau, AK

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAGq...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments RE: All Southeast deer proposals, including but not limited to WP22-07, WP22-08, WP22-09, and WP22-10

Kyle Ferguson <pabucktail@hotmail.com >

Mon 7/19/2021 5:34 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

As an over 20 year resident of Sitka, and a federally qualified subsistence deer hunter, I would like to state my opposition to the proposals attempting to limit the deer hunting opportunity for non-qualified hunters in Southeast Alaska. My opposition is for the following three reasons:

First, there is no valid scientific reason for the proposed limitations. There are currently no existing or anticipated population concerns for deer in Southeast Alaska. Deer numbers across the region are increasing. With the general pattern of mild winters in the last decade Admiralty, Baranof, and Chichagof deer numbers are as good as they've ever been. In GMU 3 it looks like deer numbers are the best they've been in at least a generation. Scientific study of deer numbers in GMU 4 showed that numbers are high enough to sustain a limit for all residents of 6 deer per year. Anecdotal information from hunters and people who live in Southeast's subsistence communities indicates the general impression of excellent deer numbers.

Secondly, there is no valid social reason for the proposed limitations. In a 7/16/21 article in the Sitka Sentinel members of the Regional Advisory Council were interviewed and stated their rationalizations for these proposals. The reasoning revolved around perceptions of unfairness related to boats and trucks owned by other hunters accessing hunting areas, and perceptions of increased competition and decreased opportunity for federally qualified users. Neither of these points stands up under the scrutiny of facts. No matter who we are, there will always be someone with a better truck or boat than any one of us. Being offended by this reality will make us all a bunch of victim-based thinkers, and in sum are the mere voice of emotions rather than real facts. In regards to the idea of increased competition and decreased opportunity, if anywhere were to qualify for such an idea it would be Sitka, the subsistence community with the greatest numbers of qualified, non-qualified and non-resident hunters. In spite of the greatest numbers of competition, Sitka hunters don't seem to have a problem meeting their subsistence deer meat needs. This fact was acknowledged by Sitka RAC member Harvey Kitka who stated Sitka hunters don't have the problems alluded to by the RAC members from other communities.

In contrast, there are actual social reasons for rejecting these proposals. Deer hunting anywhere, but especially in Southeast Alaska, is a time-honored activity which affords people an opportunity to sustain themselves while enjoying and passing on a heritage that transcends generations. We all live in small towns here. The reality is that for reasons of employment, marriage, medical concerns, education, or various other factors, any one of us could find ourselves with family members living in non-qualified Alaska communities, or down south. I hate to envision a scenario where a grandfather in Sitka, an uncle in Angoon, or father in Kake couldn't take a young person deer hunting because a proposal such as this made it illegal to mentor the next generation.

Lastly, data and facts shows there's no practical reason for the proposed limitations. In the same 7/16/21 Sitka Sentinel article ADF&G biologist Steve Bethune was interviewed. He pointed out some

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAIsn...> 1/2

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

interesting facts related to hunter effort. Across the region it seems hunting pressure is light. Additionally, non-qualified hunter effort has remained stable while hunting effort by qualified subsistence hunters has declined. I don't know why there are presumably less qualified subsistence hunters, or why the same numbers of hunters are hunting less days. But the fact remains that the data shows if anything, hunters in the communities involved in this proposal have even greater opportunity than they did ten or twenty years ago.

Thank you for your hearing and consideration,

Kyle Ferguson, Sitka

sent from [Outlook](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAlsn...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to these proposals

Ron Flint <ron@nuggetoutfitter.com>

Mon 7/19/2021 2:02 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Federal Subsistence Board;

Count me in opposition to the following proposals.

1. western Admiralty from Sept 15 to Nov 30 that includes Hawk Inlet and south WP22-07
2. reduced bag limit for Chichagof (Hoonah and Tenakee, Freshwater Bay) from 3 to 2 WP22-08
3. closure of Lisianski Oct 15-Dec 31 WP22-09

Thank you for your time,

Ron Flint

12070 Cross St.

Juneau, AK. 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAPIS...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments regarding 22-07, 22-09

Peter Flynn <flynn.peter@gmail.com >

Mon 7/19/2021 8:32 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

To whom it may concern,

I am an active hunter from Juneau, AK who would be affected by proposals 22-07 and 22-09. Myself and the group of people whom I hunt with also respect and hold great respect for the subsistence rights of other people in this state and wholly support their right to put food in the freezer. As hunters we hunt what only we can eat, aren't after trophies, and respect the land. We often hunt out of a cabin off the hoonah road system, always enjoying our conversations with neighbors and locals whether on the ferry, on the roads, or in town. We also fly into many of the affected areas, sometimes directly from Juneau sometimes from other local airports, enjoying the cabins and beautifully different terrains that are available there. I am opposed to the aforementioned proposals as I believe there are better tools than closure to ensure that subsistence needs are protected without wholly excluding other parties, especially with such a healthy population of blacktails. Other tools are available that would provide for all affected parties such as altering bag limits depending on your subsistence qualification. Curtailing bag limits for non-subsistence-qualified hunters in these areas would keep subsistence as the dominant harvests while regional hunters from larger towns would be able to participate, as is being proposed in 22-08.

Thank you for your consideration,

Peter Flynn

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAMg6...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07, WP22-08, and WP22-09

Charles Frey <cfrey09@gmail.com>

Fri 7/16/2021 3:36 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

I am firmly opposed to WP22-07, WP22-08 and WP22-09. These proposals rely on hearsay & unscientific data to back up the proposed changes. The Alaska Dept of Fish & game who studies these areas is opposed as they cite healthy deer numbers. In addition, these areas are hard to access & have relatively light hunting pressure. This is pure & simple federal overreach & an attempt to lock down Alaska's wilderness for a self-serving reason by those in charge & those who sponsored these proposals.

Regards,  
Charles Frey

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAIrpV...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition of proposals 22-07, 22-08 and 22-09

Mary Glaves <Mare\_e86@hotmail.com>

Mon 7/19/2021 1:24 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Dear Federal Subsistence Board,

These proposals do not seem to be being proposed based on science and monitoring of deer populations. ADF&G recently INCREASED the annual bag limit of deer from 4-6 in Port Frederick. FQUs are also allotted an additional month (January 1-31) to subsistence hunt, which actually puts unnecessary pressure on deer during the hardest month of winter for the deer, and the easiest month for someone to harvest a deer as they get pushed down to the beaches. These proposals add unnecessary restrictions to Juneau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

[Mary Glaves](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAKIK...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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

Attn: Theo Matuskowitz,  
Office of Subsistence Management  
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska  
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. Limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris  
P.O. Box 32403  
Juneau, Alaska 99803

*Richard Harris*

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MMDNJZQAQAOyD...> 1/2



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

July 14, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Hooton".

Shawn Hooton  
Vice President, TSI

*Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945*

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Subsistence proposals for Sitka Blacktail Deer in AK**

Brooks Horan &lt;brookshoran@yahoo.com &gt;

Wed 7/14/2021 9:58 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

 3 attachments (2 MB)

WP22\_09 ADFG comments Draft\_Final.pdf; WP22\_08 ADFG comments Draft\_Final.pdf; WP22\_07 ADFG comments Draft\_Final.pdf;

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

Dear Sir/Ma'am,

I am writing to express my lack of support for the proposed changes to sitka blacktail hunting in SE Alaska. The data just does not support these changes. I understand that the purpose of the subsistence board is to listen to rural residents in AK. I have respect for the decisions made by the board to ensure proper distribution of resources. As a past Kodiak resident, I experienced scientifically sound board decisions first hand, and benefited from them. But in this instance, the data does not support the proposed changes. Take the Lisianski proposal, the hunter data shows that success rates for rural residents/federally qualified users (FQUs) is the best in the state. Given that success rate, the actual number of rural resident hunters has decreased. There is just no mathematical or scientific reason to support this change to limit access to non-federally qualified users (NFQUs). I fear cutting such huge swaths of land out for FQUs will concentrate NFQUs into a smaller area making overall deer management that much more difficult. I strongly oppose these proposals as a scientist and as a resource user. I have attached the ADFG comments which represents the best evidence to support my input. Thank you for your time and for the work you do to ensure that the best science is followed in these management decisions. I hope this comment reaches you before the July 19th deadline and can be considered in your decision along with the comments of my fellow Alaskans.

Very Respectfully,

Brooks Horan

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAMZ...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife proposal 22-08

Aaron Hulett <aaronthenurse@icloud.com >

Sat 7/17/2021 10:14 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Regarding wildlife proposal 22-08 on Chichagoff island in Alaska I would like to voice my opposition. The numbers of deer on the island and harvest data do not support the claims made. This change would have a dramatic negative impact on non-federally qualified users and minimal or no positive effect for federally qualified users.

Thank you,

Aaron Hulett  
1670 Mendenhall Peninsula Rd  
Juneau, AK 99801  
(360)460-4179

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAH%...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition to WP22-07, WP22-08, WP22-09

Brandon Ivanowicz <blvanowicz@pndengineers.com >

Mon 7/19/2021 4:11 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Attention: Theo Matuskowitz

The intent of this email is to be on record in my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

I support the views of the Territorial Sportsmen, Inc. of Juneau and the Alaska Department of Fish and Game in their opposition to these proposals. Please see the attachment. Thank you. Brandon Ivanowicz.

[There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQPEP...> 1/1

Navigation

# Territorial Sportsmen

Representing the sporting lifestyle of Southeast Alaskans

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## There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters!

Posted on July 17, 2021 by territorialsport in Homepage

Comments on these are due by this Monday, July 19, 2021 (email: [subsistence@fws.gov](mailto:subsistence@fws.gov) or fax: 907-786-3898).

**The first proposal (WP22-07) is a closure of most of west Admiralty Island September 15 – November 30 for Juneau hunters. This includes all areas south of Hawk Inlet. Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

*TSI opposes this proposal and respectfully asks that it not be adopted.*



7/21/2021

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

**The second proposal (WP22-08) reduces the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA – Hoonah & Tenakee areas). Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

*TSI opposes this proposal and respectfully asks that it not be adopted.*

**The third proposal (WP22-09) is a closure of Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island October 15 – December 31. Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-09) to close deer hunting in Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island from October 15 to December 31 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort has remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

<https://territorialsportsmen.org/there-are-three-federal-subsistence-wildlife-proposals-being-considered-that-will-affect-juneau-deer-hunters/>

2/4

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

Dear Federal Subsistence Board,

The Alaska Department of Fish and Game's Juneau-Douglas Advisory Committee thanks you for the opportunity to submit written testimony on WP22-07, WP22-08, and WP22-09.

Our 15-member citizen volunteer committee represents diverse user groups and perspectives; we have designated seats for people who represent commercial fishing, sport fishing, hunting/personal use, hunting guiding, charter fishing, trapping, as well as non-consumptive users. We strive to represent the interests of our diverse constituencies, holding a half dozen meetings each year to both discuss fish and game issues as well as to create a public forum for consideration of proposed regulations that impact our region. Under the guidance of the Alaska Department of Fish and Game, our body is charged with weighing proposals that will impact State of Alaska Game Management Units 1C, 1D, 4, and 5, but we pride ourselves in thinking inclusively about our broader region.

Like the Federal Subsistence Board and the Regional Advisory committee, we believe we need to support rules and regulations that create equitable and sustainable fishing and hunting opportunity. As a group, we are thankful to have abundant opportunity to fish, hunt, and feed our families from the land, and, for many of us, to earn our living from well managed and abundant fish and ungulate populations. We also recognize and celebrate the cultural significance that fishing, hunting, and gathering have for so many people in our region. While we live in Juneau--and we recognize that there is more pressure on our wild fish and animals close to town--most of us travel regionwide to hunt, fish, and work, and we are especially mindful of the incredibly important role that hunting plays in rural Alaska. Finally, all our discussions and recommendations are underscored by a strong desire to ensure equitable access to wild food well into the future.

We see that there are legitimate concerns raised by those who participated in the meetings that lead to these proposals; indeed, the lack of ferry service and the broader impacts from the Covid-19 pandemic have created real impacts on food security in rural communities. We are not convinced, however, that these proposals best address the issues raised in the comments.

Instead of addressing these very real food security hardships, we worry the proposals could instead amplify tensions between federally qualified and non-federally qualified hunters, straining cultural and family ties between communities in Southeast Alaska. Because residents of our region move between rural areas and especially Juneau for work and school (and demographic trends suggest this movement from rural to more urban areas has been especially pronounced over the last decade), there are significant numbers of now-Juneau-based hunters who return home to villages to hunt with family. As such, these proposals could in fact reduce harvest success for those who need it most. That is, the non-federally qualified hunters who

successfully harvest animals in each of these areas are often former federally qualified hunters who have moved to Juneau, but return home to help put up food for their families.

In each of these proposals, we also concur with Alaska Department of Fish and Game's detailed and well-researched position that the proposals' respective closures to non-federally qualified users are not warranted for conservation concerns. We therefore see these as allocative proposals, serving to limit opportunity for residents of our region.

We look forward to continuing to listen and to understand the concerns raised by federally qualified hunters, and we stand ready to create a forum to discuss ways to address these issues. Such a forum or open dialogue between users across the region would strengthen our shared interest in sustaining the strong connections to the land provided by traditions of hunting and fishing. We would also be happy to work with the Regional Advisory Committee to propose and champion changes through the Alaska Board of Game process that could alleviate some of the problems.

We urge you to maintain consistent access to deer hunting opportunity for residents of our sparsely populated region by voting no on these proposals.

Sincerely,

Juneau Douglas Advisory Committee

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Wildlife proposals 22-07 through 22-09**

Jones Chiropractic &lt;akchiros@gmail.com&gt;

Mon 7/19/2021 10:34 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Federal Subsistence Board  
Office of Subsistence Management.  
Attention: Theo Matuskowitz  
1011 E. Tudor Road, MS-121  
Anchorage, Alaska 99503

Dear Federal Subsistence Board,

I have deer hunted Admiralty Island and Chichagof Island for the last 25 years. From my personal experience, I wholly agree with Alaska Department of Fish and Game's (ADF&G's) assessments on the following proposals.

I oppose the Wildlife proposal 22-07 that attempts to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). I wholly support ADF&G's comments opposing this proposal.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes the actual reason for the decline of federally qualified user (FQU) deer harvests are from a decline in participation and effort by FQU's, NOT depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort is also declining. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQU's, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-07 and respectively ask that it not be adopted.

I oppose Wildlife Proposal 22-08 that attempts to reduce the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA).

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAJov...> 1/3

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer in NECCUA, ADF&G increased the annual bag limit from 4 to 6 west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer, compared to 3 deer for NFQUs. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-08 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-09 that attempts a closure of Lisianski Inlet, Lisianski Strait, and Stag Bay of Chichagof Island October 15 to December 31.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-09 and respectfully ask that it not be adopted.

Warm Regards,

Resident Hunter of Alaska

--

Dr. Stefanie Jones



10004 Glacier Hwy  
Suite B  
Juneau, AK 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAjov...> 2/3

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP-22 07,08 and 09

David Keller <saltheart76@gmail.com>

Mon 7/19/2021 1:58 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Good afternoon,

I am writing to you today to voice my opposition to proposed regulation changes WP-22 07, 08 and 09. I feel that the changes, if approved, would negatively affect hunters who do not qualify for subsistence permits.

Thank you for considering my comments.

Regards,

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAAIJ7...> 1/1

7/6/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-(8,9,10) comment

elickirby@gmail.com <elickirby@gmail.com>

Sun 7/4/2021 11:00 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hopefully I got the numbers correct for the sections on the deer limits for the areas around pelican hoonah and angoon. I think a reduction in harvest limit like the one proposed in pelican will be more effective while also allowing people like myself(juneau resident) access and use of the forest. Even a reduction to 2 deer per season in these areas would cause a large reduction in the game taken while allowing us to still hunt. The area around the mainland of juneau receives a lot of pressure so the ability to hunt outside has a lot of value for people like me who primarily eat deer, bear, and moose throughout the year.

Thanks for your time and protection of the forests.

Sincerely

Elic Kirby

<https://outlook.office365.com/mail/subsistence@fws.gov/deeplink?popoutv2=1&version=20210628001.07>

1/1

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Changes 22-07 22-08 and 22-09**

Chris klawonn &lt;chris.klawonn@gmail.com&gt;

Fri 7/2/2021 7:18 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Hello,

My name is Chris Klawonn, I live in Juneau and have been a resident in Juneau for a vast majority of my life. I plan on raising my children here, and I have loved the aspect of boating, fishing, and hunting my entire life. I'd like to keep this short and simple as I hope you are busy reading lots of comments on this topic. Closing the back side of admiralty to specifically Juneau residents is unnecessary, and would be costly and near impossible to regulate.

The number of Juneau residents hovers around 35,000, the total number of reported hunters in GMU 4 that reported a harvest in 2019 is 3,377 according to the ADF&G website. Let's assume that every single one of those harvests came from Juneau, which I know from friends and Facebook isn't the case, that's only 1 in 10 people that live in Juneau claiming deer on admiralty. I don't see this as anything near an issue effecting deer population on admiralty. Second, if this proposition did pass you'd need troopers to nearly constantly monitor the back side of admiralty to ensure that nobody is breaking the law. How many officers, boats, and planes would it take to find the few boats from Juneau to genuinely balance the manpower, equipment, and fuel costs.

Please understand, I realize the people's frustration of seeing pictures with a huge commercial fishing boat with 20 deer on the bow, and realize that this is a bit excessive on the taking of such a great resource. Even worse is hearing the wonton waste of deer or really any animals, on this island or in any other location. But to squarely place the blame for this on the residents of Juneau is wrong.

Admiralty island is 1,646.4 square miles, making it the 7th largest island in the United States. Cutting off half of it to one community of 3000 or so hunters isn't right, and I hope you can see my side.

Good luck with your decision and thank you for your time.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Object to Proposals**

Jay/Amy Lloyd &lt;jayamyllloyd@gmail.com&gt;

Mon 7/19/2021 12:28 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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I would like to submit my objection to proposals WP22-07, WP22-08 and WP22-09.

The abundance of the animals in the areas as stated by the Alaska Department of Fish and Games objection to the proposals does not warrant this action. Federally qualified hunters also have an extended season that they can hunt these areas. I do not feel that these proposals are necessary or required at this time.

Sincerely,  
Jay Lloyd

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQALXx...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments opposed to proposals WP22-07, WP-08, and WP-09**

David Love &lt;pandalid@yahoo.com &gt;

Tue 7/13/2021 11:51 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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These comments concern Federal subsistence management program's Proposals WP22-07, WP22-08, and WP22-09.

As a hunter who lives in a non-subsistence area (Juneau) but uses sport hunting means to harvest wild game which is an essential source of protein for my annual sustenance, it is my observation (borne out by the ADF&G surveys) that there is not a conservation need to limit sport harvest of deer in any part of Unit 4, Southeast Alaska.

ADF&G Wildlife Conservation has many years of objective, quantitative data that shows that the deer populations in Unit 4 are not depleted, but are in fact at high and stable population levels, even after the heavy snow year of 2020/2021. Restrictions on non-subsistence hunters is not necessary and unfairly targets sport hunters whose numbers and hunt days are stable when NFQUs are declining. Also, the average number of deer harvested in Unit 4 has been stable for all users for 10+ years with good success rates in deer harvested. There is not increasing competition for deer among FQUs and NFQUs.

I urge the Federal Board to NOT support these proposals, and vote to oppose these proposals, since their claims are not true compared to the objective, quantified data showing strong population trends and stable deer harvest in Unit 4.

Thank you for your time, David Love, hunter and resident of Juneau

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6/30/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Southeast proposed subsistence deer limitations**

Charlie Martelle &lt;martellec@yahoo.com&gt;

Tue 6/29/2021 10:29 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello,

I am writing about the proposed changes of wp-22 07, Wp-22 08, and wp-22 09. I am not in favor of limiting Juneau residents on these areas. I rely on wild game as my main source of protein. By limiting me and other residents of Juneau we will see an increase in the number of hunters in the areas that are not mentioned. This would mean it would be harder to get away from others and find the game we fill our freezers when we hunt closer to town.

We are already so limited in Juneau with hunting, one needs to either have a boat or charter a float plane to find "good" hunting. By dropping the limit on the road system in hoonah you would essentially take our one hunt that doesn't require owning a vessel or chartering.

From my experience on the coast there is abundant numbers of deer, same with the south west side of admiralty. If there was a shortage of animals I would be all for reducing bag limit, but I do not believe this is the case.

Again I am against any changes to the current regulations.

Thank you for your time  
Charlie Martelle

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQALNz...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal subsistence hunting and trapping regulations comment 2021**

Sarah Matula &lt;s\_matula1@yahoo.com&gt;

Mon 7/19/2021 1:14 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I have been a resident of Juneau for 8 years, and have been lucky enough to have gained relationships with people through out SE. Through these relationships, I have had the opportunity to learn, experience, and put into practice in my own life the respect and appreciation for the substance lifestyle.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

Thank you for your time-  
Sarah Matula, Douglas, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAFPo...> 1/1

7/19/2021

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[EXTERNAL] WP 22-07; WP 22-08; WP 22-09; WP 22-10

Grey Mitchell <fullcurl@live.com>

Wed 7/14/2021 9:04 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attn: Theo Matuskowitz, Office of Subsistence Management

I am writing to oppose the referenced federal subsistence proposals for deer in Southeast Alaska as listed above. These proposals have no basis, as there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. Without specific data to demonstrate a particular subsistence purpose, these proposals are not only arbitrary and capricious, but they will violate the constitutional rights of non-federally qualified users. The credibility of federal subsistence management of wildlife resources on public lands hinges on the use of scientific data. Not only do these proposals lack scientific data, they lack any data to demonstrate a justified subsistence need. I urge the rejection of these unsupported and unjust proposals. Thank you.

Grey Mitchell  
Alaskan since 1966  
3065 Douglas Highway  
Juneau, Alaska 99801

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAAI9o...> 1/1

7/19/2021

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**[EXTERNAL] WP22-07, WP22-08, WP22-09**

Richard Morris &lt;akreeldeal@gmail.com &gt;

Mon 7/19/2021 8:40 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Attention Teo Matuskowitz

Good day,

There are a few proposals that I am writing in opposition to.

The first is WP22-07, which proposes to close the western side of Admiralty from Hawk inlet to the southern tip to non-federal users to make it easier for one group to gather food. I also try to fill my freezer with wild game so this would be selecting them over me. Although I have never hunted the area due to its remoteness and difficulty to get to during the hunting season I feel it will be a stepping stone to closing more of the National Forest as they request larger areas to make it easier for them and more difficult for others. I would say that looking at the ADFG hunt records would show that the majority of hunt effort from Juneau is on the eastern side of Admiralty island and any that can make it to the proposed area would say that hunting there is so much more easy than the eastern side. It is all relative.

WP22-08 is the looking to close the northern area of Chichagof island to non-federal users. I bought property in Freshwater bay for the main purpose of hunting. There are already regulations in place that have a harvest limit of 3 deer versus the 6 I could shoot anywhere else on the ABC islands. This is another remote area for someone from Juneau to access and has limited pressure from Juneau as could be found in the hunt records. The majority of deer that are harvested in the area are mainly road hunts as there is an abundance of logging roads throughout the area. As is the case with hunting, it can be challenging for those that don't get out into the forest and expect to fill there freezer shooting deer on the side of the road. Closing this area would impact the value of my cabin and experiences that come with having it there.

WP22-09 is looking to close other areas in the Hoonah area. Again, due to the remoteness this area does not get a lot of pressure from non-federal users.

In closing, these three proposals are trying to make harvesting deer a sure thing for the communities of Angoon and Hoonah. It is hunting, there are no guarantees that you will see a deer, let alone harvest one. Closing these areas will only benefit a few, and probably only to a small degree. These

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7/19/2021

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areas are in the Tongass National Forest, which is to be managed for all user groups. With these proposals it will start to be managed for the select few and I oppose it.

Thank you,

Rich Morris

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAN1n...> 2/2

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal 22-07, 22-08, 22-09

Michael Nelson <michaelbn78@gmail.com>

Thu 7/1/2021 2:49 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing in opposition of these specific proposals, Wildlife Proposal 22-07, Wildlife Proposal 22-08 and Wildlife Proposal 22-09.

These proposals discriminate against Juneau residents unjustly. Excluding the small percentage of Juneau residents that have the ability to hunt in these areas will not increase subsistence means.

Michael Nelson  
208-755-7618

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQABsq...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-08 comments**

nicholasporr &lt;nicholasporr@yahoo.com&gt;

Sun 7/18/2021 11:34 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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I am writing to urge the board not to pass proposal WP22-08, which would reduce the bag limit to 2 deer for non-federally qualified hunters. There is no shortage of deer in the hoonah area nor are non-federally qualified hunters displacing Hoonah hunters. I understand that last November was quite challenging for all hunters, though this is likely due to the ice storm that passed over northern southeast Alaska. In addition to being unnecessary for federally qualified hunters to meet their subsistence needs, this proposal will needlessly affect a number of cabin owners in Freshwater Bay. These hunters are typically not hunting the road system and are not placing any pressure on road system deer. For these reasons, I ask the board to not pass this proposal.

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7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07,08,09,10

Tom Radandt <tomradandt0@gmail.com>

Fri 7/9/2021 2:52 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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There is no scientific evidence that supports the idea that non-Federally qualified users impact the success of qualified users. Therefore you must reject proposals 22-07, 22-08, 22-09 and 22-10.

To favor one group over another bases on any political characteristics is discrimination, which illegal.

Tom

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAEqr...> 1/1

7/19/2021

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**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

Mark Sams &lt;msams@pndengineers.com &gt;

Mon 7/19/2021 7:53 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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Attention: Teo Matuskowitz

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this change to the deer hunting regulations on the Chatham straight side of Admiralty Island. The regulation will only isolate one user group which has a very low impact on the area due to the distance from Juneau. Due to the distance Juneau residence do not regularly access this area since it is more than 1.5-2hr run time. All other local communities are subsistence communities including, Petersburg, Kake, Tenekee, and Hoonah, leaving Juneau, the furthest community from the location a user group that would be isolated. I think it would be very easy to look at the hunting records collected by the state of Alaska every year to determine how much pressure Juneau actually has on the location to determine how much this change in regulations would actually effect the overall hunting pressure.

WP22-08

I oppose this change to the northern Chichagof Island since it again singles out a single user group. I currently Own a cabin on norther Chichagof Island but am a Juneau resident. This proposed change would limit my access to deer hunting at my cabin which I have invested heavily in over the past 5 years to use as a place to hunt. For me, the area is difficult to access from Juneau due to weather and distance, over 2hrs. Again if you look at hunting records, I believe you would find Juneau residences have a limited impact on the overall harvest on Norther Chichagof Island.

WP22-09

I oppose this change in regulations for closing deer hunting in Lisianski Inlet. This area is also very remote and very difficult for non-subsistence hunters, Juneau residence, to access. Hunting records should show that this area is seldomly access from Juneau this time of year due to weather so this proposal will have little effect on competition. The only residences this change will effect are from Juneau since access is limited to Pelican and Elfin Cove.

In general I believe instating restrictions that only effect one group is a poor decision that becomes a slippery slope for other communities to make similar requests. Pretty soon, Juneau would have very limited hunting locations in a National Forest that is supposed to be managed for all user groups. If subsistence user groups are having difficulty harvesting deer, maybe that's an indication that the bag limits for all groups are to high and a better proposal would be to limit all harvest verses a single user group that has low impact on all three proposed areas. Another option would be to limit the ability to proxy hunt. I know fishermen can go out and

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7/19/2021

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get to these remote places in the winter and shoot more deer than their limit due to proxy hunting. I understand the need for it in certain instances, but maybe limiting the number of proxy tags allowed to hunt at one time would help spread the pressure out over a longer period and less deer would be harvested. This would reduce the overall pressure and competition for sub-subsistence harvesters.

Historically these areas being proposed, as all deer habitat, is far more effected by weather and old growth timber harvests (heavy snow and large scale timber clear cuts) than the limited number of hunters. When these environmental and man-made (timber harvest) factors affect the population, all hunters are effected equally.

These proposed changes will also hurt any non-resident hunting charters that are based out of these local communities, hurting the local economies. Non-resident hunters will bring a large boost to these small communities at the end of the typical tourist season helping fortify the community with funds to weather the winter. Out of town hunters will not use Angoon based on the proposed WP22-07 since they would be very limited in hunting locations.

Thank you for taking the time to read my comments.

Mark Sams

Owner of Cabin in Freshwater Bay, Directly effected by 2 out of three of these proposed changes.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212**

CHARLES SCHULTZ <cjs16@me.com>

Sun 7/18/2021 3:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attention Theo Matuskowitz,  
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12. Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoonah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration. Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration ,  
Charles Schultz  
Juneau, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAD6p...> 1/2

SCI Alaska Chapter  
 Eagle River, Alaska 99577  
 Cell (907) 903-8329  
 Tel: (907) 980-9018  
[www.aksafariclub.org](http://www.aksafariclub.org)



July 19, 2021

Federal Subsistence Board  
 Attn: Theo Matuskowitz  
 Office of Subsistence Management  
 1011 East Tudor Road, MS-121  
 Anchorage, AK 99503-6199

[Electronic Submission]  
[subsistence@fws.gov](mailto:subsistence@fws.gov)

RE: SCI-AK comments on Wildlife Proposal 22-08 Hoonah

Dear Chairman Matuskowitz,

The Safari Club International Alaska Chapter (SCI-AK) writes in opposition to Wildlife Proposal 22-08 (WP22-08). Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI-AK is nationally and internationally recognized for its contributions in support of SCI's four major mission areas: Advocacy, Conservation, Education, and Humanitarian Services.

WP22-08 is counter to our goal of ensuring fair and equitable access to game resources in Alaska. The below comments focus on the indices of deer abundance, deer hunter effort, and harvest in Alaska Game Management Unit 4 (GMU 4) as reasons to reject WP22-08.

The proposal claims that non-federally qualified users (NFQU) are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer in GMU 4. WP22-08 asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Alaska Department of Fish and Game (ADF&G) analysis of deer population, hunter effort, and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5), excluding Juneau and Ketchikan, are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game increased the deer bag limit in GMU 4 from 4 to 6 deer because of the GMU's uniquely healthy population of Sitka black-tailed deer.

GMU 4 consistently shows a high black-tailed population. Pellet group counts are usually well above the high-density threshold and are often double the counts in other GMUs. Aerial surveys — measured in deer/hour sighted — were conducted for two locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska and estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe

*Safari Club International Alaska Chapter  
 First for Hunters - First for Wildlife*

winters. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Yet, based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

GMU 4 Sitka black-tailed deer are usually above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns. Taken together, these indices of deer abundance — pellet group surveys, alpine counts, mortality transects — suggest this proposal cannot be based entirely on a conservation concern.

Overhunting is often used as a justification for area closures or implementation of restrictive conservation measures. ADF&G produces estimates for hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. From 1997-2019 the estimated average annual harvest in GMU 4 has been 5,725 deer taken by 3,282 hunters. GMU 4 supports the highest deer harvest in the state and the historical harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs. From 1997 to 2006, FQUs harvested on average 152 deer annually. Since 2013, FQUs have harvested an average of 49 deer annually. This represents an approximate 70% decline. There is a similar pattern for NFQUs, who averaged 349 deer annually from 1997-2006. Since 2013, that average has declined to 115 deer annually. SCI-AK notes hunter numbers are decreasing across the board on a national level, not just in Alaska or even GMU 4. This proposal will further restrict access for hunters and lead to a further decrease in the number of hunter's in one of the state's most viable hunting regions.

The Alaska Board of Game has also established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law, ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The board establishes an ANS for a game population through review of long-term population and harvest information. With deer harvest levels within the recommended ANS range, the argument that the closure needs to occur in order to benefit ANS users is moot.

SCI-AK members are especially supportive of family hunting traditions because learning to hunt starts with family and community mentors. FCU status is not inherited. Children who leave federally qualified communities to attend school elsewhere will be excluded and harmed by WP22-08. In November, many FCUs invite their family members home for peak season deer hunts. Other NFCUs return to traditional hunting areas to harvest deer on state hunting proxies or kill deer on their limit to share with family, friends, or elders. None of this use would be allowed to continue in the WP22-08 area if it is passed.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters, and field observations by management biologists, the department has concluded that there is no conservation concern for the GMU 4 deer population. With deer population remaining high and stable, harvest within its historical range, and state ANS requirements being met it is unnecessary to restrict hunting in GMU 4 to the benefit of a small handful of users. WP22-08 will reduce the amount of deer meat coming into communities while simultaneously failing to provide conservation benefits to an already healthy deer population. SCI-AK urges you to not adopt WP22-08.

Thank you for your consideration.

**John Sturgeon**  
**SCI Alaska Chapter President**  
 E-mail: [president@aksafariclub.org](mailto:president@aksafariclub.org)  
 Cell: (907) 230-0072

*Safari Club International Alaska Chapter*  
*First for Hunters - First for Wildlife*

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Wp22-08 wp22-07**

isaiah Sipniewski &lt;stansipak@gmail.com &gt;

Thu 7/15/2021 8:09 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello,

I'm writing this email in regards to the recent proposals for restrictions on harvesting deer in the above subject line.

As a Juneau resident of 20 years I have enjoyed hunting these areas on chichicoff Island and the south end of admiralty Island.

I have a family cabin on admiralty at the southern end where dating back as far as my wife's grandfather, has used for hunting deer.

There is no decline in deer population and no reason why this area should be restricted to Juneau hunters. There are more than enough deer for those who choose to "break suction from there truck or boat seat" and hike to find deer.

I have family in hoonah who I have enjoyed staying with and hiking the mountains together. Taking my sons and teaching them how to navigate the mountains. On the road systems in hoonah I have enjoyed hiking to my favorite spots for as long as ive lived in Alaska.

I see no good reason why any of the 3 proposals should even be on the table.

If people are complaining of not enough deer it is due to their own laziness and unwillingness to hike into the woods for deer. There are more than enough for the surrounding residents and residents of Juneau.

Thank you for taking my comments into consideration.

Stanley sipniewski

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAN%...> 1/1



7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Subsistence Hunting Closure**

Peter Strow &lt;pstrow@hotmail.com&gt;

Mon 7/19/2021 5:20 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello,

I would like to submit a commit regarding the closure of hunting to Juneau residents for WP22-07, WP22-08 and WP22-09. I don't believe these areas should be closed to Juneau hunters. Accessible hunting is difficult in Southeast Alaska and many Juneau residents depend hunting deer in these areas. Proposing these closings should be backed by scientific data and I think this needs to be further studied before any closures are passed.

Thank you,  
Peter Strow

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAE3q...> 1/1



July 16, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

RE: Comments on WP22-07 Closure to non-Federally qualified users, Admiralty Island; WP22-08 Place a harvest restriction on non-Federally qualified users, Northeast Chichagof Controlled Use Area; WP22-09 Closure to non-Federally qualified users, Lisianski Strait; WP22-10 Lower harvest limits for non-Federally qualified users, Lisianski Strait;

Dear members of the Federal Subsistence Board:

The Sportsmen's Alliance is a leading national organization that defends the right of our members to hunt, fish and trap in all 50 states. I am writing today to urge you to use sound scientific evidence to discharge policy related to changing existing hunting seasons, harvest limits and methods and means of taking wildlife related to federal subsistence hunting and trapping and more specifically proposals WP22-07, WP22-08, WP22-09 and WP22-10.

The Sportsmen's Alliance strongly believes that if populations are abundant than all public land users in the Alaska should have access to these lands for hunting and trapping. These lands are managed and conserved using public funds contributed by sportsmen across Alaska and the United States through license fees and excise taxes paid on the purchase of firearms and other hunting equipment.

When determining whether to close certain federal lands to land users that are non-subsistence hunters, the Alliance on behalf of our Alaska members urge you to follow scientific evidence and population data to determine the best course of action. If wildlife populations numbers indicate abundant numbers of game species these lands should remain open to both subsistence hunters and non-subsistence hunters. The North American Model of Wildlife Conservation dictates that science should be the guiding tool for discharging wildlife policy and our membership stands firmly on the principles of this model.

We understand the complex nature of this decision, so we urge you to make these determinations based solely on science and not based on political or social pressure. Thank you for the opportunity to comment on this issue and thank you for your time.

Best,

Jacob Hupp  
Sportsmen's Alliance  
Associate Director of State Services

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

Dillon Tomaro &lt;dillonpaultomaro@gmail.com&gt;

Mon 7/19/2021 9:06 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this proposed change to the 2022 regulations. I have been hunting south of Hawk Inlet towards and beyond Angoon my whole life and I have not witnessed any decrease in deer population other than the years following an excessive amount of snow that caused the yearlings to die. I have had nothing but pleasant encounters with the hunters of Angoon and they always seem to kill more deer than us at ease with their local knowledge (same concept that I would have a better knowledge of the landscape, and therefore the upper hand with hunting in the Barlow area). That is some of my favorite hunting territory with all of the old growth that you cannot find north of Hawk Inlet. I also enjoy hunting Florence Lake which would be affected by this proposal. Rarely do I encounter other hunters from Juneau when I am hunting South of Hawk Inlet and I believe this should be easy to see by looking at peoples hunting reports. I do not think that the Juneau residents' impact on the deer population south of Hawk inlet is significant at all and there is no way that it is hurting the Angoon residents' harvest needs. If this proposal goes through then to be fair, the Angoon residents should not be able to hunt north of Hawk Inlet (even though it is the same case that their hunting has no impact on Juneau residents deer population). There has been no problem in the past with Juneau residents affecting the Angoon residents hunting opportunity and I believe it is simply unfair to go through with this proposal.

WP22-08

I oppose this proposed change to the 2022 regulations. I believe that again the Juneau resident impact is very low in this area.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

Thank you for taking the time to read my comments.

Dillon Tomaro

Lifelong Southeast Alaska Hunter

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAF0R...> 2/2

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comment on WP22-08, WP22-09, WP22-07

John Unzicker <jmunzicker@gmail.com>

Wed 6/30/2021 8:56 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

This comment is regarding the following proposals:  
WP22-08, WP22-09, WP22-07

We are all Alaska state residents and have the right to utilize all of the state land regardless of our primary residence. As a lifelong Juneau resident who pays the same fees to hunt game in SE AK as anyone else in the state, I am extremely discouraged by these proposals.

Juneauites would be forced out of major hunting areas during the prime time of the season. If Juneau residents are not allowed to hunt the far, outlying areas, we will all be forced to hunt the immediate areas around Juneau which will result in over-hunting, overcrowding, and less game around Juneau. This proposal is absolutely inequitable and will divide communities.

What about hunters who have cabins or family in Hoonah, Pelican, or Angoon? This is absolutely wrong and only goes to serve a very small population of the state. Residents of Juneau have just as much right to hunt these zones as the residents of Hoonah, Pelican, and Angoon have the right to hunt anywhere in the state. There is enough wildlife and land for everyone to utilize for subsistence and it should be shared equally.

And does this mean that any other resident not from Juneau can hunt these areas? Sitka? Haines? Gustavus? Petersburg? Why only Juneau?

Thank you,  
John Unzicker  
2016 Glacier Bear Blvd.  
Juneau, AK. 99801  
907-723-3191

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAMTa...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] proposals WP22-7, WP22-8 and WP22-9

Luke Woodruff <alaskan\_waters@yahoo.com>

Wed 6/30/2021 9:23 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Please do not consider the new proposals WP22-7, WP22-8 and WP22-9 as new regulation. I do not believe the current deer harvest levels combined with predation/winter kills deem this kind of proposal necessary. Subsistence and non subsistence communities alike count on deer as a part of their diet along with fish, water fowl and berries. Every year is different, sometimes hunting is difficult and other times not. Let's avoid creating regulations that favor one group over another because one group thinks they are having to work harder.

Luke Woodruff  
Juneau, AK

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQANW...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09

greg-donica@gci.net &lt;greg-donica@gci.net&gt;

Mon 7/19/2021 12:06 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;; deanna.perry@usda.gov &lt;deanna.perry@usda.gov&gt;

Cc: Norm and Linda Carson &lt;nrcarson@att.net&gt;

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

To Southeast Subsistence Regional Advisory Council:

There have been many personal discussions lately on deer hunting in Lisianski Inlet and Pelican area. Almost to the point of "Hatfield & McCoys" situation.

It seems pretty simple to me. Alaska Fish & Game has done a good job of managing the hunting of deer. The rules and regulations in place are reasonable, practical and effective. Abide by them. Until there is obvious and proven data to verify a severe reduction in deer population, leave it as it is.

ALL hunters should use good judgement when hunting, doing so in a safe manner. They should be aware of and respect personal property, be it a year around residence or a cabin. Don't hunt so near.

There are times when bears are in abundance and their food sources are not. Extreme fall & winter weather can also contribute to more deer being taken by bears. And yet, data does not support any reduction in deer population, due to bears or hunters. Should that ever happen, then cut the limit of deer to be taken. If a hunter knows he/she will not use the amount of deer allowed, take less.

My husband has hunted in this area with other family members who live in Pelican, our son-in-law as well. We have been property owners in Pelican for twenty years. Generations of families still hunt there and hope to continue to do so. They may not be FQU. For some reason, that has been a topic that is causing those who are and those who are not, to be divided and confrontational. Is that really necessary?

Be a legal and responsible hunter.

Please consider this an opposition to WP22-09, and also WP22-07, WP22-08, & Wo22-10.

Thank you,  
Greg & Donica Jerue  
PO Box 211434  
Auke Bay, Ak. 99821

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAKD...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attn: Theo Matuskowitz,  
Office of Subsistence Management  
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska  
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. Limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris  
P.O. Box 32403  
Juneau, Alaska 99803

*Richard Harris*

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MMDNJZQAQAOyD...> 1/2



<b>WP22–09/10 Executive Summary</b>	
<b>General Description</b>	<p>Wildlife Proposal WP22-09 requests that Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) be closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users. <i>Submitted by: The Southeast Alaska Subsistence Regional Advisory Council</i></p> <p>Wildlife Proposal WP22-10 requests that the deer harvest limit for non-Federally qualified users in Lisianski Inlet and Lisianski Strait be reduced to 4 deer. <i>Submitted by: Patricia Phillips</i></p>
<b>Proposed Regulation</b>	<p><u>WP22-09</u></p> <p><b>Unit 4 – Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31</i></p> <p><b><i>Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.</i></b></p> <p><u>WP22-10</u></p> <p><b>Unit 4 - Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31</i></p> <p><b><i>Non-Federally qualified users may harvest up to 4 deer</i></b></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b> Proposal WP22-09 and Proposal WP22-10

<b>WP22–09/10 Executive Summary</b>	
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>63 Oppose, 1 Neutral</b>

## DRAFT STAFF ANALYSIS WP22-09/10

### ISSUES

Wildlife Proposal WP20-09, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) be closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users.

Wildlife Proposal WP22-10, submitted by Patricia Phillips of Pelican, requests that the deer harvest limit for non-Federally qualified users in Lisianski Inlet and Lisianski Strait be reduced to 4 deer.

### DISCUSSION

The proponent of WP22-09 states that it recently became more challenging for Federally qualified subsistence users in Lisianski Inlet, Lisianski Strait and Stag Bay to harvest sufficient deer for their needs due to increased hunting pressure from non-Federally qualified users. They state that regulatory change is needed to protect the deer population from further depletion and increase opportunity for Federally qualified subsistence users.

The proponent of WP22-10 states that hunting pressure from non-Federally qualified users results in Federally qualified subsistence users' deer needs not being met. The proponent further contends that bear predation on deer populations have deer staying out of the beach fringe, which makes deer skittish when there is ongoing deer hunting pressure.

#### Existing Federal Regulation

##### Unit 4 - Deer

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

#### Proposed Federal Regulation

##### WP22-09

##### Unit 4 - Deer

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

***Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct.***

**Unit 4 - Deer**

*15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.*

WP22-10

**Unit 4 - Deer**

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

*Non-Federally qualified users may harvest up to 4 deer*

**Existing State Regulation**

**Unit 4 - Deer**

*Chichagof Island east of Port Frederick and north of Tenakee Inlet*

<i>Residents and Nonresidents - 3 deer total</i>	<i>Bucks</i>	<i>HT</i>	<i>Aug. 1 - Sept.14</i>
	<i>Any deer</i>	<i>HT</i>	<i>Sept. 15 - Dec. 31</i>

*Remainder*

<i>Residents and Non-residents - 6 deer total</i>	<i>Bucks</i>	<i>HT</i>	<i>Aug. 1 - Sept.14</i>
	<i>Any deer</i>	<i>HT</i>	<i>Sept. 15 – Dec. 31</i>

**Extent of Federal Public Lands**

Unit 4 is comprised of approximately 96% Federal Public Lands and consists of 95% U.S. Forest Service (USFS) managed lands and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (**Map 1**).

**Customary and Traditional Use Determination**

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

**Regulatory History**

See WP22-07.

**Biological Background**

See WP22-07.

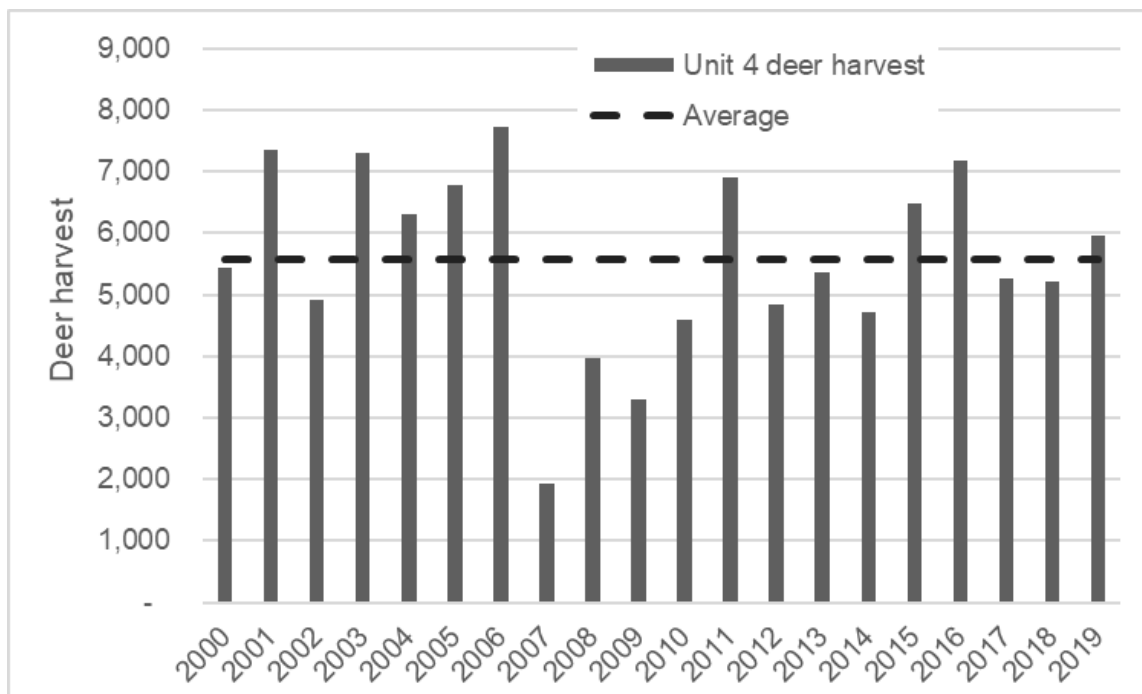
Habitat

See WP22-07.

Population Information

McCoy (2017) outlines the limitations of estimating deer populations in Southeast Alaska, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall. McCoy (2019) explains that Unit 4 deer pellet-group counts in 2019 were higher than previous counts in all three survey areas. Pavlov Harbor, on northeast Chichagof Island, was surveyed in 2019. Results indicated a 39% increase in pellet-groups from the last survey conducted in 2010 (McCoy 2010).

Annual harvest is one indication of deer population status. The average annual legal deer harvest in Unit 4, 2000-2019, was 5,579 (**Figure 1**). Deer harvest was below average in 2007-2010 probably due to high deer mortality from several consecutive harsh winters. Unit 4 annual deer harvest has been increasing to pre-2007 levels, suggesting that the Unit 4 deer population has recovered from those harsh winters.



**Figure 1.** Unit 4 estimated annual legal deer harvest, 2000-2019.

## Harvest History

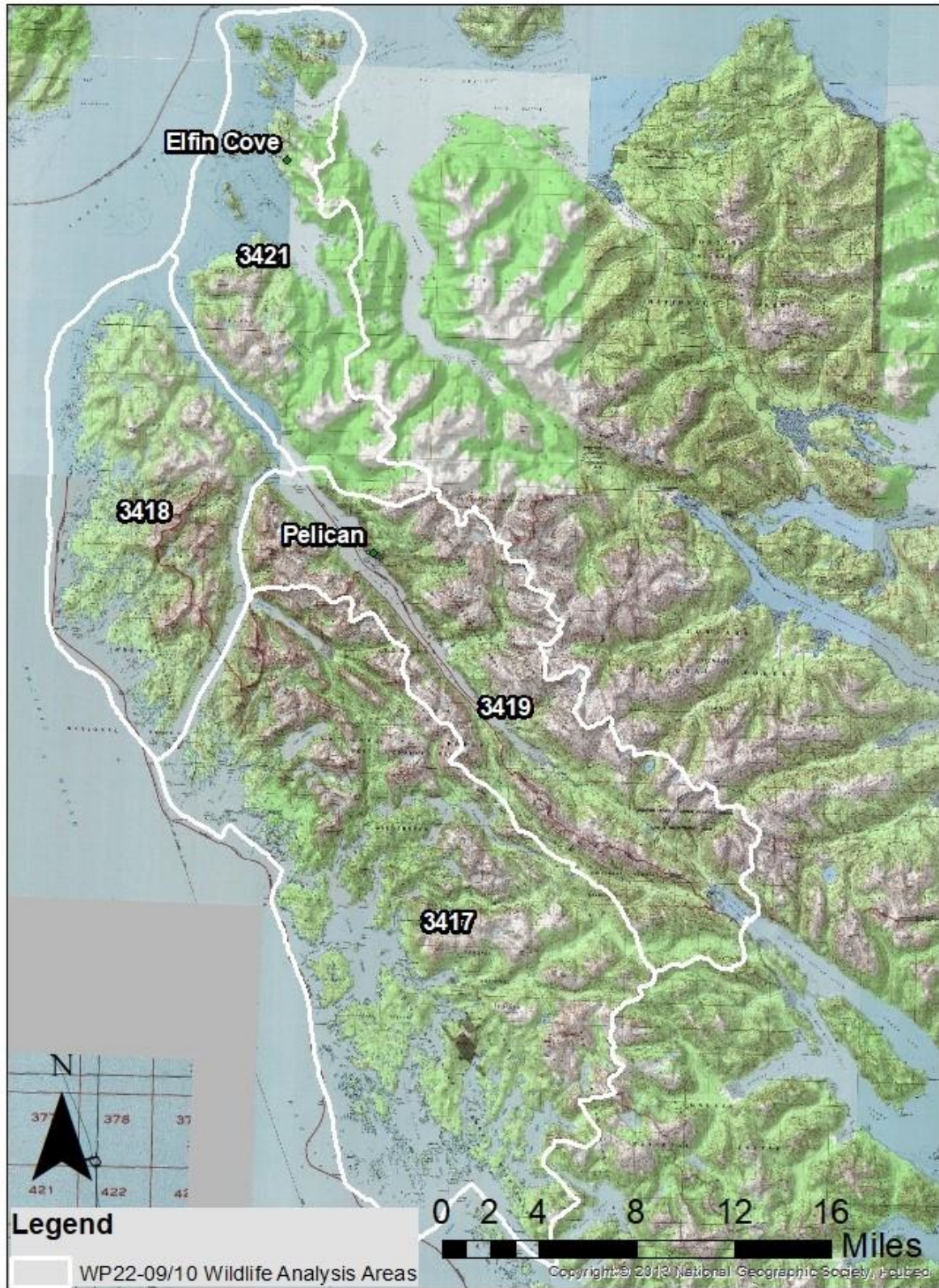
Through 2010, deer harvest data provided by the Alaska Department of Fish and Game (ADF&G) are based on a sample of hunters. In general, 35% of hunters from each community are sampled each year and while response rates vary by community, the overall response rate across communities is approximately 60% each year. Harvest numbers are extrapolated using expansion factors that are calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response is low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, exact numbers should be considered estimates and used with caution. Trends, however, especially at larger scales, should be indicative of general harvest change. Since 2011, harvest data have been gathered through mandatory reporting. ADF&G expands the harvest estimate based on returned reports to account for unreturned harvest reports (Bethune 2020).

Deer harvest in Unit 4 in 2007/08 ( $1,858 \pm 236$ ) was down significantly from 2006/07 ( $7,746 \pm 594$ ) and was the lowest harvest in Unit 4 in over a decade due to significant mortality from preceding severe winters (McCoy et al. 2007). Prior to 2007/08, Unit 4 deer harvest was mostly stable, fluctuating around 7,000 deer per year. Harvest data indicates that the annual Unit 4 deer harvests increased beginning around 2008-2009 and was 5,969 in 2019 (**Figure 1**).

The proposal analysis area for WP22-09/10 relative to Unit 4 is shown in **Map 1**. The harvest data presented is specific to wildlife analysis areas (WAA) encompassing, but not limited to, the area of Lisianski Inlet, Lisianski Strait, and Stag Bay (**Map 2**). Deer harvest information at a finer scale is not available, however data for WAAs in **Map 2** should sufficiently convey harvest and effort trends in the proposal analysis area.



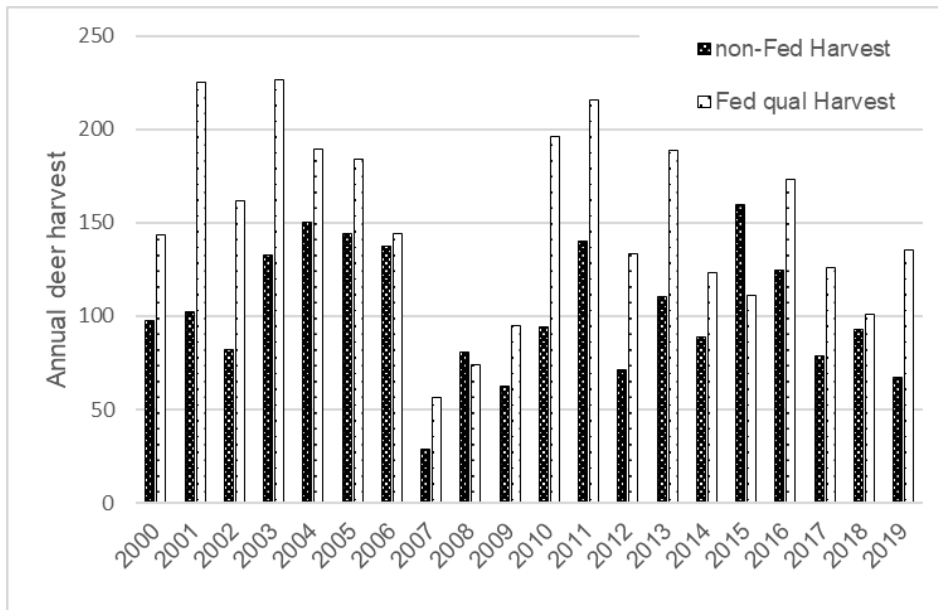
**Map 1.** Unit 4 management map with proposal analysis area encircled in red.



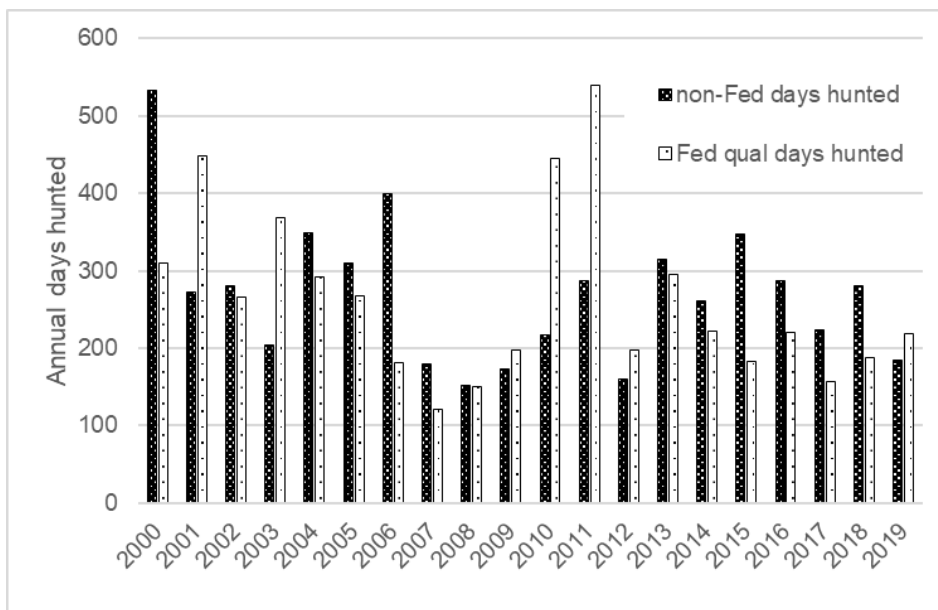
**Map 2.** Wildlife analysis areas used for harvest and effort data analysis.



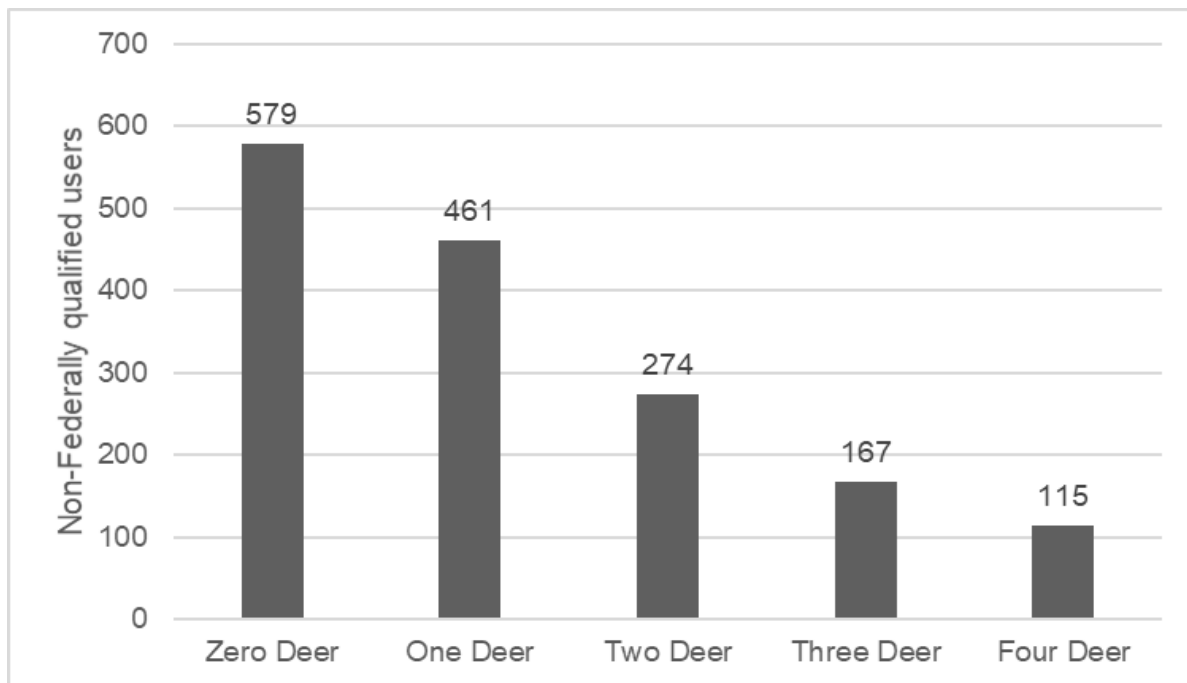
Harvest and effort by Federally qualified subsistence users and non-Federally qualified users in the relevant WAAs is presented in **Figures 2** and **3** below. Federally qualified harvest is consistently higher compared to other users (**Figure 2**) while effort, expressed in hunter days, is generally lower (**Figure 3**). Non-Federally qualified users have a lower success rate, which results in higher hunting effort compared to Federally qualified subsistence users. Both harvest and effort appear to be fairly stable since 2011 when mandatory harvest reporting was implemented. Ninety-three percent of non-Federally qualified users harvest less than 4 deer annually from Unit 4 (**Figure 4**).



**Figure 2.** Annual deer harvest in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

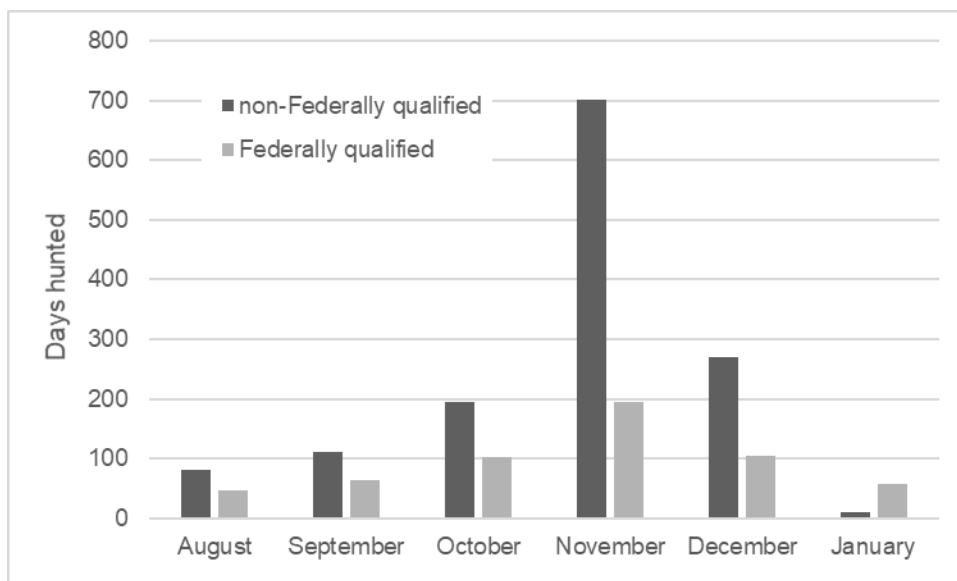


**Figure 3.** Annual hunter days in the proposal analysis area, 2000-2019 (ADF&G unpublished data).



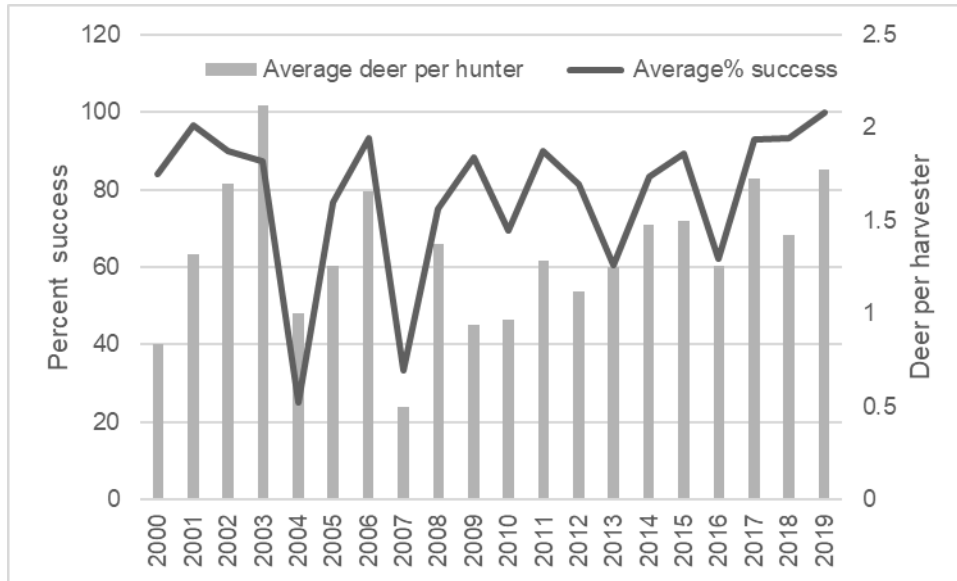
**Figure 4.** Average number of non-Federally qualified users harvesting 0-4 deer annually in Unit 4, 2000-2019 (ADF&G unpublished data).

The chronology of deer hunting effort in all of Unit 4 is probably similar to effort in the proposal analysis area, varying by user group. November is the most popular hunting month for both groups, particularly for non-Federally qualified users (**Figure 5**).



**Figure 5.** Average number of days hunted by month by Federally qualified subsistence users and non-Federally qualified users in Unit 4, 2000-2019 (ADF&G unpublished data).

Hunter success rate and the number of deer harvested per hunter, are indicators of whether user nutritional needs are being satisfied. For data management purposes, a hunt is considered successful when any number of animals is harvested on a single hunt. The success rate in November for residents of Pelican has been 86% or higher since 2014, and the annual success rate has been 93% or higher since 2017. The number of deer harvested per hunter has been trending up since 2009 (Figure 6).



**Figure 6.** Hunter success rate and deer harvested per hunter for Pelican residents hunting in Unit 4, 2000-2019 (ADF&G unpublished data).

**Effects of the Proposal**

These proposals would restrict non-Federally qualified users from hunting deer in portions of Lisianski Inlet, Lisianski Strait and all of Stag Bay. Restricting non-Federally qualified users could decrease overall deer harvest and reduce competition with Federally qualified subsistence users in the area. Lower harvest and reduced competition may lead to more favorable hunting conditions for Federally qualified subsistence users. Non-Federally qualified users may shift some deer hunting effort to other areas of Unit 4, possibly displacing other hunters.

**OSM PRELIMINARY CONCLUSION**

**Oppose** Proposals WP22-09/10.

**Justification**

Section 802(2) of ANILCA requires that subsistence uses by rural residents of Alaska shall be “the priority consumptive uses of all such resources on the public lands of Alaska.” Section 804 provides a preference for subsistence uses, specifically “...the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes.” Section 815(3) provides that the Board may restrict nonsubsistence uses on Federal

public lands if “necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law.”

Restricting deer hunting in the analysis area for non-Federally qualified users does not appear necessary for conservation because deer populations in Unit 4 are high and may be approaching carrying capacity in some locations.

Hunting effort in Unit 4 by non-Federally qualified users is highest in November and to a lesser extent in December. This could be evidence that increased competition during this time may be a factor affecting Federally qualified subsistence users’ needs being met. However, the success rate in November for residents of Pelican has been 86% or higher since 2014 and annual success rate has been 93% or higher since 2017. The number of deer harvested per hunter has been trending up since 2009. Thus, a partial season closure to non-Federally qualified users in the proposal area does not appear necessary to continue subsistence uses.

Very few non-Federally qualified hunters harvest more than 3 deer annually in Unit 4, so restricting them to 4 deer annually would not significantly affect harvest or effort by non-Federally qualified users or the hunting experience of Federally qualified subsistence users. Lowering the harvest limit for non-Federally qualified users does not appear necessary to continue subsistence uses.

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## WRITTEN PUBLIC COMMENTS

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Alaska Outdoor Council comments - 2022-2024 Wildlife Proposals

Rod Arno <rodarno@gmail.com >

Mon 7/19/2021 12:23 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>

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Alaska Outdoor Council  
310 K Street, Suite 200  
Anchorage, Alaska 99501  
July 19, 2021

RE: Public comments for FSB 2022-2024 Wildlife Proposals

The Alaska Outdoor Council (AOC) is a Statewide coalition of individual members and clubs representing 10,000 Alaskans who hunt, trap, fish and recreate on public lands/waters in Alaska. AOC Club Representative have participated in the regulatory process of managing and allocating fish and game in Alaska since before statehood in 1959.

Numerous proposals submitted by Federal Subsistence Regional Advisory Councils, federally recognized subsistence communities, and individuals confirm the fears that many AOC Representatives had at the time of the passage of Alaska National Interest Lands Conservation Act (ANILCA) 1980. Dual management of who can harvest game depending on whether you are on state public and private lands or if you are on federal lands was not the intend of Congress when they passed ANILCA.

AOC opposes WP22-07, WP22-08, WP22-09.  
Alaska Department of Fish & Game data should not invoke a complete closure to non-Federally Qualified Subsistence Users under Section 804 of ANILCA. Even the 9th Circuit Court, *Ninilchik Traditional Council v. U.S.*, 227 F.3d 1186 in 2000 understood the priority given in Title VIII of ANILCA was not absolute.

AOC opposes WP22-15.  
Congress's findings and declaration in Sec. 801 of ANILCA should leave no room for regulatory action by the Federal Subsistence Board (FSB) regarding anti-trapper claims. Sec. 801(3) of ANILCA should have the FSB concentrating only on "remote federal lands", as was the intent of Congress when they passed 802(2) of ANILCA.

AOC opposes WP22-16 thru 22.  
Providing a priority for some individuals or communities to harvest game on federal public lands located on the Kenai Peninsula only exacerbates the conflict between federally qualified hunters and Alaskans living in non-federally qualified areas of the state. Both groups of hunters are similarly situated.

AOC opposes WP22-32.  
It would be in Alaskan's best interest if the FSB would reduce the number of Alaskans allowed a priority to harvest game on federal lands just based solely on where they live, not how.

Thanks for the opportunity to provide public comments,

Rod Arno, Public Policy Director  
Alaska Outdoor Council

Sent from Rod Arno's iPad.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAL9rk...> 1/1

To Whom It May Concern,

I am writing today thankful for the opportunity to voice my opinion regarding the following proposals.


**WP22-07** - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where Juneau residents even on a good weather day cannot reach. It will confine hunting areas to Juneau residents which will increase pressure on already overcrowded areas furthermore helping to create unsafe scenarios. It is discriminatory, unethical, and does not show good land management for the "American people" rather it divides and polarizes Alaskans in the region.

**WP22-08** – I hope this is not a biased proposal toward Juneau hunters and is actually based on science relating to current deer populations. How did we go from 6 to 2? Snow and ice lead to winter die off which effects overall deer populations not hunters.

**WP22-09** - Rural hunters outside of Juneau already have the benefit of a longer harvest period. Just because our jobs and lives are based in Juneau does not mean we want the high cost of inferior meat from Costco.

In closing please do not take away these beautiful places to Juneau residents limiting our access to the outdoors, feeding our families, and the social benefits hunting brings us.

Thank you



Adam S. Anderson

Mike Bethers  
P.O. Box 210003  
Auke Bay, AK 99821  
(907)-321-1186  
[mikebethers@gmail.com](mailto:mikebethers@gmail.com)

June 22, 2021

Theo Matuskowitz  
Federal Subsistence Board  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

Re: Wildlife Proposals 22-07, 22-08, and 22-09

Dear Mr. Matuskowitz:

Please include these comments in the public record. Please give a copy to each board member.

Subsistence deer hunters (Federally Qualified Users or FQUs) from Angoon, Hoonah and Pelican are claiming that non-subsistence deer hunters (Non-Federally Qualified Users or NFQUs) are out competing them for blacktail deer. Village residents are federally qualified and already have priority use of the deer resource as their season runs through January 31, while the NFQU season ends December 31.

The Southeast Alaska Subsistence Regional Advisory Council has developed three wildlife proposals – 22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican – to address claims that NFQUs are responsible for reduced subsistence harvests in these villages. These proposals are based only on comments from villagers and are not based on any actual data or documented observations.

Based on my personal observations made deer hunting in Northern Southeast Alaska over the last fifty years and findings of the Alaska Department of Fish and Game (ADF&G) harvest studies, these proposals can not be justified in any way and should not be adopted.

I have been a lifelong deer hunter and am over seventy years old. The last several years I've spent more than fifty days in the woods annually, and for the last fifty years, my hunting has been in Northern Southeast Alaska; I've hunted in all areas included in these proposals. I can still get up the mountain farther than I can get a big buck out of the woods and am very selective of what I harvest and where. I use a boat to access my hunting areas and do a lot of calling and don't hunt from drivable roads. I haven't been on the Hoonah road system in decades. Every year I let many deer walk away rather than shoot them and have absolutely no problem getting enough deer to meet my family's needs.



Theo Matuskowitz

June 22, 2021

Page 2

**Following are comments that apply to all three proposals (22-07, 22-08, and 22-09)**

FQUs already have priority to deer as they can hunt through January when deer are often most available while NFQU's season ends December 31.

The winter of 2007-2008 saw a record high snowfall throughout Northern Southeast Alaska and as a consequence, deer were driven to the beach in numbers not seen since. They were at the peak of availability. Since the winter of 2007-2008 there has been less snowfall and deer have not hit the beach in numbers seen during the 2007-2008 winter. In the last three to four years there has been less snow and more rain. Deer have not herded up on the beach much and it has been more miserable to hunt in the rain but hunters I associate with, that like to hunt and eat venison, were out there hunting.

In the areas I've hunted the last ten years, I have seen fewer hunters than in earlier years.

Since the deer killing winter of 2007-2008, the deer populations in all three areas have rebounded and currently are at or near all time highs.

**Comments on 22-07 Admiralty**

This proposal would essentially close federal lands from Pt. Marsden to Pt. Gardener to deer hunting by NFQUs from September 15 through November 30.

Most NFQUs from Juneau who hunt the West side of Admiralty usually turn around at Funter Bay or Hawk Inlet as there are few to no good anchorages south of Pt. Marsden. Also, the proposed closed area is too far from Juneau for day trips. It is my belief that most subsistence hunting from Angoon is done on the beaches, which are not included in this proposal as beaches are state land.

I know several NFQU hunting parties that hunt West Admiralty, mostly north of Pt. Marsden, and they are typically quite successful. I know of two parties of NFQUs that hunt out of Angoon and they always get their deer.

**Comments on 22-08 Hoonah**

Hoonah has really degraded local wildlife habitat through extensive clear-cut logging (which has been shown to significantly impact wildlife values over the long period) and the extensive road system (which has been shown to also reduce the area's wildlife values). The Hoonah road system has become a favorite place to conduct hunting by Hoonah residents, especially after doe season opens. Please note that reduced sailing schedules of the Alaska Marine Highway's ferries have reduced opportunity for NFQUs from Juneau to get to Hoonah to compete with local hunters.

Over the years, deer have adjusted to the heavy hunting pressure along the Hoonah road system. After a week or two of harassment by road hunters, surviving animals move away from the roadside. However, I know those that hunt in the woods accessed by the Hoonah road system have had no problem finding deer.

Theo Matuskowitz

June 22, 2021

Page 3

I have heard of two Hoonah residents who in the past typically shot many more deer than the limit, which would take deer away from other hunters.

Also please note that data shows there is minimal exchange of deer between the north shore of Tenakee Inlet and areas accessed by the Hoonah road system. The mountains on the north side of Tenakee Inlet serve as a dividing line for Tenakee Inlet deer and deer living north of the mountains in areas accessed by the Hoonah road system. Therefore, only areas accessed by the Hoonah road system on northeast Chichagof Island should be included in proposal 22-08 and the north shore of Tenakee Inlet should be excluded.

**ADF&G deer harvest and hunter effort data applies to all three proposals.**

1. Deer populations are at very high levels.
2. There have been substantial decreases in hunting effort by FQUs
3. There has not been any noticeable increase in hunting effort by NFQUs
4. The reduced number of FQUs still hunting are harvesting more deer than in the past.
5. There is simply no justification to support any of the three proposals.

**In conclusion**

There are very high numbers of deer available in all areas covered by these proposals, however, FQU hunters are no longer hunting. They are not taking advantage of the standard deer season (August 1 – December 31) or their priority opportunity of hunting through January. Deer are often most available during January, due to winter snow levels, etc.

Any restriction of NFQU deer hunting opportunity will not increase subsistence harvests in the villages. FQUs from the villages need to get out of the house and out of their vehicles and back into the woods to get their deer. They will have no problem.

Proposals 22-07, 22-08, and 22-09 are based on inaccurate beliefs of FQUs in the villages and lack any justification. Adoption of any of these proposals would be a needless and huge disservice to many hunters in northern southeast Alaska, hunting a strong public resource, on public lands.

Please reject (not approve) proposals 22-07, 22-08, and 22-09.

Thank you for the opportunity to comment.

Sincerely,

Mike Bethers  
Auke Bay, Alaska

Mike Bovitz

9500 N Douglas Hwy

Juneau, AK 99801

(907)723-2279

[Metalworks@gci.net](mailto:Metalworks@gci.net)

Theo Matuskowitz

Federal Subsistence Board

Office of Subsistence Management

1011 East Tudor Road , MS-121

Anchorage, Ak 99503-6199

Re: wildlife proposals 22-07, 22-08, and 22-09

Hello Mr. Matuskowitz:

I am NOT in support of the 3 wildlife proposals-22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican.

The rural subsistence deer hunters/Federally qualified users are claiming it is getting harder to fill their quota of deer. They are concerned about the potential of not enough deer for their personal use to live a subsistence living. There is no science based facts to what is being questioned or science based facts to what they are stating on the deer population.

Alaska fish and game do harvest studies, pellet counts, flights for deer etc, etc. This is all paid for by every Alaskan through tax dollars. Based on their science the number of deer is quite plentiful and Federally Qualified Users already have an extended season going through January 31<sup>st</sup>. Alaska fish and game last year allowed every resident 6 deer instead of the normal 4. Why would they do that if there was a resource problem?

The only thing that has changed over the past years is our weather pattern. Snow is no longer coming in and staying on the beach for long periods of time driving the deer to the beach. Which is a good thing because as those big snow falls happen mother nature NOT man takes over and the deer start to die .

Proposals 22-07, 22-08, and 22-09 are not science based, have no justification, and would be the wrong thing to do to many Southeast Alaska hunters, hunting a public resource.

Please REJECT and NOT APPROVE proposal 22-07, 22-08, 22-09

Thank you for your time,

Mike Bovitz

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] SE Deer Hunting**

Lee Bridgman <Lee.aklife@outlook.com>

Fri 7/9/2021 1:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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RE: proposed changes to deer hunting in Unit 4 are WP22-07, WP22-08, WP22-09, and WP22-10.

I myself do not hunt in the Southeast and do not believe the large numbers are making their way to hunt deer in this area. The cost of getting there compared to the game meat taken would make the trip counter productive. As for the Wanton Waste of game meat, I would believe that F&G would be very able to check vessels arriving in Juneau for proper care of the game meat.

The proposals will only further divide the user groups, which is not a desired result. If limits need to be reduced, for all, then so be it.

Do not proceed with these proposals.

Thank you,

**Lee H. Bridgman**

763 Wanda Dr  
North Pole, AK 99705

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAEEx...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP 22-09 Lisianski Subsistence Deer Hunting Restrictions**

bornalaska@yahoo.com &lt;bornalaska@yahoo.com&gt;

Fri 7/16/2021 12:14 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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My name is Chris Carson, my wife and I own a cabin 3 miles outside Pelican. Our cabin is in the same sub-division as the author of WP 22-09 proposal. Mr Slatter has on a number of occasions sought to purchase our property and the remaining four other lots in the division, for which he owns all the lots except for four. The four other lots are owned by people who are not residents of Pelican or other Alaska substance communities.

If this proposal was to pass, it would mean that none of us would be able to use our cabin to hunt deer. Our cabin had been in the family for over 25 years. I was born in Juneau in 1965, live in Pelican as a child and have been hunting and fishing in the Pelican area most of my l've.

I have always found there to be plenty of deer in the area and truly believe this proposal is Mr. Slatter attempt to restrict the resources from the remaining families who live in Slatter National Park, (as local Pelicans call it) so they would no longer have a reason to visit Pelican, which could lead to selling their property.

Hunting and fishing has always been an important part of our lives. My son who was born and lives in Juneau now has children who have spent time hunting at the cabin, this is now the third generation of Carsons hunting at the cabin.

I strongly encourage the board to decline WP 22-09 Lisianski Subsistence Deer Hunting Restrictions as it does not have any solid standings to support its implementation.

Thank you for your time,

Chris L. Carson  
Sent from my iPad

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQALZe...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal - 22-09 - Lisianski

CARSON JIM <akjim22@yahoo.com>

Mon 7/19/2021 7:50 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

We would like to comment on the above proposal regarding hunting in the Lisianski Inlet. As hunter's and long time Alaskan residents we strongly oppose this proposal. The land in the proposal is public land. Since when can one person's want's oversee the public. There is no lack of deer or evidence of such to prompt such a proposal. If we allow this type of strong arm tactic from an individual special interest, what is next for the public land user and average Alaskan. Please do not allow this to pass. Public land is Public land. No one person should change that.

Jim and Tama Carson  
Juneau Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQABa5...> 1/1

## Subsistence Opposition WP22-09 SE

I, Norm Carson, am adamantly opposed to the proposed rural qualification for deer hunters within the Lisianski Inlet & Strait area. I recognize my comments are lengthy; therefore my recommendations are preceding how they were derived.

### Recommendations

The best solution is to not support the Federal Subsistence proposal. I recommend the Pelican Fish & Game Advisory Board address this issue with adequate public notice so that we can arrive at well thought out recommendation unlike the proposal that was rammed through the SE Federal Advisory Board March 16-18 with selective input from the community. These are some suggestions I would have for the Pelican Board:

- RF qualified no change, 6 deer.
- All non rural federally qualified, NRFQ, Alaska residents: 4 deer, season ending December 31.
- Non-residents of Alaska: 1 deer, season August 1 ending October 31.
- ADF&G Game Biologist for the area has flexible management authority to change bag limit or season as needed for resource. ADF&G has determined there is not a shortage of deer.
- There is not a shortage of deer in this area; weather and an abundance of brown bear deprived of their customary food source kept the deer very skittish and off the beaches.

If WP22-09 should it pass will actually make the situation worse for the following reasons:

- NRFQ hunters will have to hunt on State tidelands up to the mean high tide mark. This will result in more skiffs running the beaches and the deer will quickly learn to run off at the sound of an outboard.

- NRFQ hunters will be allowed to hunt on private land; this will increase the potential for conflict with a land owner as we saw in 2020.
- RFQ hunters from other areas such as Haines and Sitka will not be affected by WP22-09.

### Background Information

I first came to Pelican in 1966 as a college kid working at the Pelican Cold Storage; in 1968 I joined the Alaska State Troopers. I retired in 1990 from law enforcement as Commander of all Trooper operations in Southeast Alaska.

My parents resided in Pelican and in their later working years were commercial salmon trollers. I spent my annual leave time commercial fishing and hunting in the Lisianski area; my mother was an avid deer hunter and fisherman. At the early age of 7 or 8 years both of our sons participated in October and November deer hunts with myself and my parents. Both of our sons are State Troopers, one in Juneau and another in Delta. Both of them look forward to a deer hunt with their father during November; we often talk about the family time they spent hunting as youngsters with their grandparents.

In 1981 my wife and I obtained a 3 acre land parcel in the State sponsored land lottery. We built our future home 3 miles south of Pelican and acquired 2 other lots in our cove through purchase. After my retirement from State employment I spent sufficient time at our Pelican home to claim residency in the area; our sons joined me during the summer commercial fishing the local waters. My wife remained employed in Juneau until our youngest son graduated in 1997; at that point we sold the Juneau property and moved to our Pelican home.

Pelican was never a total subsistence community in the category of Angoon, Hoonah, or Kake. Pelican was founded in 1938 as a site for a cold storage; the nearest "tribal community" was Hoonah. Pelican was a mixture of Finns, Swedes, Norwegians, Tlingits, Swiss, and Filipinos. At a time in our past there were approximately 350 residents, perhaps 200 year round. In the 1980's the cold storage was exporting approximately 5 million pounds of frozen fish annually; at one time we led the world in the landing of King Salmon. The Lisianski area was never the site of an Alaska



Native settlement; but some of our earliest residents were Alaska Natives and important to the building of the town.

The town's economy slumped as the fish market turned from whole frozen fish to value added in the early 2000's. The town's population dropped to around 100 residents. On the positive side we have seen a resurgence in the commercial trade with the opening of a new processing operation that is employing roughly 25 workers seasonally. The sport fishing charter/ lodge businesses bring an estimated 500 clients annually and this helps support sailings by the Alaska Marine Highway Service and scheduled airplane service from Juneau. The fact that Pelican has hydro power is an incentive for further expansion if our housing shortage is solved.

The question of food security is important. I can say that 99% of the residents and perhaps 100% receive food from Juneau stores. On ferry day the freight trucks unload pallets of food; I witness a few proponents of this subsistence rural qualification proposition and other residents gathering up their purchases from Costco, Fred Meyer, Super Bear, etc. Yes, we all harvest fish, shell fish, berries, and deer from the area; it is a supplemental part of our diet.

I have been hunting this area for over 50 years; there is nothing about the number of hunters or the availability of deer that has not cycled through the decades. In the 1990's and first decade of the 21st century I well recall turning a corner in my skiff and finding another hunter's skiff anchored where I intended to hunt. Not a big deal; I went and found another place. It was not unusual to find another hunter's prior foot prints on a the trail. Often I called up a November buck while in an area that had been hunted by some one else a few days prior, and in one case just a few hours prior.

The first Department of Natural Resource, State of Alaska, land lottery in the Lisianski area occurred some 40 years ago. Some folks from Juneau that had family or friends in Pelican obtained building lots. Other residents from Fairbanks to Sitka obtained acreage and built homes; some have become full time residents and others have recreation houses they use while fishing and/or hunting. None of the Pelican residents of that time tried to enact new laws to keep the "new comers" from taking "their fish or deer". A couple of residents have told me they used to hunt in the immediate area of our present home.

The 2020 hunting season was unusual because of the weather and the pandemic. The local spawning streams had very low returns of salmon. The summer was very moist and the berry crops were sparse. The brown bear turned to grubbing for roots in late September and October. More bear were seen on the beaches than usual; some were seen pursuing deer. It was not unusual to have bears grubbing in resident's yards in Pelican; ten were counted around Pelican Creek; just a couple hundred yards from the school. A bear was seen walking the boardwalk and another out on the breakwater where boats are stored and the city shop is located. Is it any wonder the deer were skittish and staying off the beaches?

My eldest son came out from Juneau to hunt with me during the November rut when the bucks are most likely to respond to a deer call. During this two week period the weather was so blustery that we only were able get out in the skiff for two hunts. One one of our hunts we found not much sign low and more up around the 400 foot level; we should have gone up higher. The next time we got out we found good sign at the 500 foot level; I called up three deer, my son shot one and the others got away. Later my son found another deer on the hillside not far from out home. We believe the deer were unusually high for November and very wary; probably because of bear prevalence. We had no problems with competition from other hunters for an area to hunt.

An unfortunate aspect of this proposal is that it will cause a division within the community. The newest board member, Jim Slater, pushed this proposal within the community to a select few. Jim is a passionate environmentalist; we have had discussions on cruise boats in Lisianski Inlet, charter boats, sport fishing effort, etc. I commend his concern; he has remarked that he has seen the effects of tourism in California where he once resided and he does not want to see it happen here. I agree with him; but I do not think that is likely due to the remoteness, land use restraints, and cost of getting here.

The manner in which this proposal was hurriedly brought before the March SEARAC meeting may have been technically correct; in my estimation it was inappropriate. These are the issues I question:

- A select few were notified this proposal would be put forth.

## March 14th

- 7:45 PM; Jim sent email to the selected few “I am still gathering the information to put in a form to submit a proposal. It will be along the lines of of what we discussed.”

## March 15th

- 9:55 AM: Jim sent the 6 members an email: “Hi everyone, here is the proposal we discussed. I have also included the agenda, which has the dial in info. But here it is:” You should call in either Tuesday or Wednesday at 9:00 AM. That is when the public testimony is scheduled. I’ll call you guys later, Thanks, Jim.”
- 2:46 PM: Jim sends email to the selected few: “Hi everyone, This was sent to me by the biologist for the area. Please give me some feedback, if you guys support this please re-confirm. I don’t want to propose it if it doesn’t have broad support from the community.”
- 5:17 PM: Jim sent email to 6 community residents with a wording recommended for supporting the proposal; he said he provided this in testimony at the previous RAC meeting:
  - “We live a subsistence lifestyle”
  - Coho run on Lisianski River
  - 500-750 charter visitors
  - concern about bareboat charters

## During the March 16 -18 Meeting:

- A select group of residents met at City Hall and utilized the teleconference phone system to call in to the SEARAC meeting and comment on the deer proposal. Mayor Weller, I believe made the call and turned it over to the few people present; two of them are on the city council. This teleconference at City Hall was not announced publicly.
- The SEARAC passed the proposal and it will be heard by the Statewide Board; this will give it extra impetus for passage.

If this issue was of such great concern, why did it take so much coaching for the testifiers? If the teleconference at City Hall were publicized might there have been at least one dissenter?

Another issue I have with the March SEARAC meeting was the generalities spoken by the proponents and the lack of follow up questions:

- “We saw quite an increase in the number of hunters in the Inlet this year.” *Follow up needed: Please quantify the number and the town or area they came from.*
- “There are several groups that live outside the area and state that come seasonally and target some of our key resources here in Lisianski Inlet. These include the coho run in Lisianski River and Sitka black-tail deer hunting in the habitat surroundings.” *Follow up needed: How many people have you seen fishing on the Lisianski River? How many fish did you see caught? Where did the large groups of deer hunters stay in Pelican? How many hunters were in these groups?*
- “fishing in Lisianski Inlet, in general, has been significantly worse over the last -- it's decreased over the last decade or two.” *Follow up needed: Is this based upon your personal fishing experience? Could this be related to the area wide issue with colder water and less bait fish?*
- “This year several members were not, including myself, able to harvest a deer or saw very limited access.” *Follow up needed: Over the previous two years, how many deer have you taken annually? How many days did you go hunting after October 15th in 2020?*
- “But over the few years we've seen a lot of big parties coming out and doing hunting.” *Follow up needed: Please describe these hunting parties; how did they get to Pelican?*
- “the concern I share with the community is the obvious growth in the sportfishing” *Follow up needed: Does most of the sport fishing by lodge clients occur in the Lisianski Inlet or out along the coast of Yakobi Island and beyond?*
- “are folks in Pelican thinking about addressing all those resources or are they focusing primarily on deer?” “All the resources.” *Follow up needed: If salmon were a subsistence issue wouldn't that remove commercial salmon fishing from the Lisianski Inlet and Strait?*
- “I'm 65 years old but I've been hunting for 50 years and this is a -- this past year has been the first year that I haven't even gotten a deer” *Follow up needed: Did you hunt with anyone else that shot deer that you could have taken?*
- “we have noticed in the last couple of years is increased pressure from people that don't live here. They show up and they compete with us directly for the resources that we're after” *Follow up needed:*

*You came here 40 years ago, were there more people living in Pelican then or now?*

- “The lodge that I spoke of is currently a summer fishing lodge and to be honest we've only just heard the idea that this is going to become a hunting lodge so this is just something that we're looking into the future to limit, if possible, if that were to become an option for a hunting lodge.” Follow up needed: *“So, we are considering a substantial regulation change to prohibit some Alaska resident hunters because of the possibility of a hunting lodge?”*

These are a few of the comments made by 5 hunters that reside in Pelican; none of the comments were questioned. A sixth person that hunts deer and testified abstained from supporting this proposal. There are more than 5 Pelican residents that hunt deer after October 15th; their lack of testimony is a result of not being notified of this proposal or because they did not want to be involved in a controversial subject with their fellow residents by voting against it.

I will submit the issue of a hunting lodge was a scare tactic used to cause some residents to testify. Consider the economics of out of state hunters coming to Pelican:

- Airfare from Juneau is over \$400.00 round trip with a 50 pound baggage limit, \$1.10 per pound overage.
- Alaska non-resident hunting license \$160.00
- Alaska non-resident deer tag \$300.00

This would amount to \$860.00 for the opportunity to bag an average 90# deer and that is before any local lodging costs are added.

Would there be a market for Alaska resident hunters? Again, there is the expense of getting the hunters from Juneau to Pelican; over \$400.00 round trip. Then, the uncertainty of air travel. From mid-October on the weather & shorter daylight hours makes flying to and from Pelican anything but a sure thing. A person may not get to Pelican for a week or once here, may not leave for an extra week. The prospective hunting lodge will have to consider the costs of extra insurance for hunters, possible weather cancellations, possible extra cost of weather preventing

clients from departing, and the liability of hunters in a new area containing unforgiving conditions. The issue of a deer hunting lodge was a useful tool for a person wanting to limit any resident hunters coming to the area.

Are there a large number of Alaska resident hunters that travel to Pelican to hunt deer? No, depending on the definition of “a large number”. Looking back at 2020 I can count a total of 18 between October 1 to December 15; these were spread out over that time. There is a group from Haines that travel to Elfin Cove and then hunt from a commercial fishing boat and concentrate their activity at Idaho Inlet, Port Althorp, and outside of Yakobi Island. The Haines group attract attention in Pelican as they end their trip here and catch a ferry back to Juneau; the Federal proposal will not affect them as they are from a rural community.

Where do the Alaska resident hunters stay when they come to Pelican? Five of these 1 to 4 person groups stay with a property owner outside the city limits. The owner purchased State DNR land in one of the land disposal programs and invested thousands of dollars in building houses on their lots. Often the houses were built by hiring workers from Pelican. These owners contribute to the local economy by purchasing airfare, ferry fare, gasoline, and other items in Pelican. Some of these hunters are relatives of the property owner who in turn is a Pelican resident; they have hunted in the area for decades. Other hunters either stay with relatives or friends in town or in a house they own within the city limits.

Is there a shortage of deer in the proposal area? No. The ADF&G data will show there are plenty of deer. Success rate for local hunters has not diminished over time; in fact it has increased. The 2020 season was remarkable for poor weather conditions and an abundance of brown bear. The difficulty many hunters faced in locating deer was not unique to the Pelican area; it was a complaint I heard from other hunters in Northern Southeast.

Will this proposal improve the hunting success for Pelican residents? No, it likely will make it more difficult. The proposal pertains only to Federal Lands, it has no effect on State or private land. State land is that portion of land below mean high tide and there are pockets of State land within the area. We can anticipate more boats running the beaches looking for deer, this will push the deer up the and make them more wary. Land owners outside the city limits can hunt on their land, many of these are 3 acres in size. Some of these private holdings are adjacent to the lands owned by proposal supporters; unless posted we can expect more unpleasant encounters between land owner and hunter.

Will this proposal affect the Haines group? No, they come from rural community. Only hunters from Juneau or Ketchikan in Southeast and any other community in the rest of Alaska will be restricted. Sitka hunters will also not be affected.

My final remark is that if a commercial deer hunting lodge were to be started, I would oppose it with every legal remedy available. I believe we can recommend changes within the ADF&G to make commercial deer harvest operations even less economical.

Sincerely:

Norm Carson  
PO Box 98  
Pelican, AK 99832

ph: 541-361-5272 or cell 907-321-1950  
email: lcarson@att.net

June 29, 2021

Linda Carson  
PO Box 98  
Pelican, Alaska 99832

Federal Subsistence Board  
State of Alaska

RE: WP22-09, Lisianski Inlet Deer

I was born in Alaska and Pelican has been my home since 1997. My husband and I reside off grid about 3 miles south of Pelican. We have two sons, one lives in Juneau and the other Delta. Both of our sons learned to hunt with their father and grandparents in this area.

WP22-09 would restrict deer hunting in our area after October 15th to only those residents that meet the qualifications for a Rural Federally Qualified hunter. Only two communities in Southeast Alaska do not meet the RFQ standard, Juneau and Ketchikan.

A recent study by the Alaska Department of Fish & Game states the deer population in our area is not at all threatened; there is no conservation issue. Further, the study shows that subsistence hunters in our area are more successful now than in previous years.

This spring we have seen many deer around our local beaches. The fall & early winter of 2020 was unusual in weather; it was very windy and warm. There was not an early snow pack to bring the deer down to lower elevations; this had a detrimental effect on hunting.

WP22-09 should not be passed.

Linda Carson  
lcarson@att.net



7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public comment: Wildlife proposals 22-07, 08, 09

Kelly Cates <kacates@alaska.edu>

Mon 7/19/2021 9:31 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Dear Subsistence Management Board,

I am writing in opposition to wildlife proposals 22-07, 22-08 and 22-09. I am a SE hunter and my family regularly hunts in each of the proposed areas. We rely on subsistence meats to feed us through the year and enjoy the memories created from our hunting trips. It is unclear to me why these proposals were initiated as the data outlined in the packets suggests that deer populations are thriving and that FQU's are harvesting more deer than they used to. So if there are plenty of deer and enough for all users, why should one user group be excluded? Again, I oppose these proposals and hope the facts outlined in the information packets are fairly weighed in the boards decision.

Thanks,  
Kelly Cates

--

**Kelly Cates**, PhD Candidate  
College of Fisheries and Ocean Sciences  
Juneau Fisheries Division, University of Alaska Fairbanks  
[kacates@alaska.edu](mailto:kacates@alaska.edu) | (360) 620-5032

'May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view'



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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments for WP22-07,8,9,10**

Matthew Catterson &lt;mattcatterson@yahoo.com&gt;

Fri 7/16/2021 4:30 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I am currently a resident of Juneau, but I have spent most of the past 15 years residing in the Southeast Alaska communities of Yakutat and Sitka. My time living, working, fishing, and hunting in these communities has engendered in me a great respect and connection to the subsistence lifestyle.

Because of my background, I can certainly empathize with the concerns presented by the authors of these proposals. However, the information provided in ADF&G Department comments is aligned with my experiences hunting in the proposal areas, which is that hunting effort in these areas is minimal and that competition between hunters is not responsible for trends of reduced deer harvest by FQUs or NFQUs. I believe it is widely accepted that environmental conditions (harsh winters), not hunting pressure, is the primary driver of deer abundance in Northern Southeast Alaska.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

As an alternative, I would not oppose regulatory changes that increase opportunity for FQU's while maintaining existing hunting opportunity for NFQUs. This type of regulatory change, coupled with ADF&G assertions that deer abundance is relatively stable in proposal areas, may achieve the increased harvest sought by proposal authors.

Thank you for your time and consideration of my comments.

**Matt Catterson, Douglas, Alaska**

<https://outlook.office365.com/mail/subsistence@fws.gov/deeplink?popoutv2=1&version=20210711001.05>

1/1

Steve Christensen  
509-643-8488  
Email: [FinnFinn2018@gmail.com](mailto:FinnFinn2018@gmail.com)

Federal Reserve Board  
Alaska Region

RE: WP22-09  
Lisianski Deer Restriction

I moved to Alaska in 1985 and resided in Juneau for almost 30 years. I moved to the Lower 48 for personal reasons. Five years ago i returned to Alaska and purchased a home in Pelican. I am presently employed at Alaska SeaPlanes in Pelican.

I have always been an avid hunter and fisherman; I was involved in subsistence hunting and fishing. I hunted to put food on my table in my first 30 years in Alaska.

A recent study by the Department of Fish & Game states the deer population in the area of Lisianski Inlet & Strait is not at all threatened. In years past I have experienced regulation changes by the ADF&G when they felt it necessary to protect the deer population; this is not the current situation.

WP22-09 would restrict deer hunting in the Lisianski area after October 15th to only those residents meeting the qualifications for a Rural Qualified Hunter. Only the residents of two communities in Southeast do not meet the rural standard; those would be of Juneau and Ketchikan.

In the past 5 years I have seen plenty of deer along the shores of Lisianski Inlet. All experienced hunters in Southeast understand that weather conditions and individual effort determine success or failure.

By current statistics, the deer population is flourishing and subsistence hunters are more successful now than in previous years.

I ask that WP22-09 not be passed.

Sincerely,

Steve Christensen  
General Delivery  
Block 1, Lot 7  
Pelican AK 99832

6/14/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09 SE Deer 4 Closure to non-Federally qualified users, Lisianski Strait

denny corbin <dennycorbin.dc@gmail.com>

Sun 6/13/2021 6:15 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: dhulen@adn.com <dhulen@adn.com>

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Re: WP22-09 SE Deer 4 Closure to non-Federally qualified users, Lisianski Strait

This proposal is ridiculous. The deer population is in fine shape as per analysis by Alaska Department of Fish and Game deer management biologists. The number of hunters has decreased (mostly the subsistence qualified hunters have decreased due to a poor economy forcing the majority of younger people who grew up here to move away in search of work). The harvest limit has been raised over last few years as there are so many deer and success rate per days hunted has increased over the last decade. According to game management biologists the deer population is at carrying capacity. In my opinion failure to harvest deer by a very few people living in the area is due not from competition but from not wanting to hike to the high country where deer have been staying because warmer winters and increased bear population that haven't been hibernating like normal from low snowfalls for most of the winter. This bear activity all winter keeps the deer on the defensive, sticking to high ground and extra sneaky.

I grew up in Lisianski Inlet a few miles outside of Pelican. My family subsisted heavily on deer and I can remember my mother telling me not to come home without a deer. I learned quickly how to catch a deer and sometimes it takes hard work. Due to the loss of economic opportunities in the area (from government over-regulation I might add) I was forced to spend my winters in southern California commercial fishing squid in order to support my young family. I still spend summers in Lisianski Inlet operating my families homestead as a fishing lodge. I maintain Alaska residency but purchase a non-resident hunting license as cheap insurance to keep enforcement from attempting Law-fare shake downs, taking me to court and forcing me to spend a lot of money proving I still intend to remain an Alaska resident. At some point I would like to come home from the (economic) war and hunt the November rut with my children in the area that I hunted with my father. This is an important cultural and traditional point for me, yes, based mostly on nostalgia, but valid all the same.

This proposed new law will shut out many people who grew up in Lisianski and who's families have long history of hunting there. It will make outlaws of people who have traditionally hunted the area for generations simply because they cannot make a living around Pelican anymore and needed to move part of the year to another location in order to survive. Parents and grandparents who still live in Lisianski will be denied the pleasure of hunting the November rut and first snowfall (which by the way is the very best of the deer hunting over the entire season) with their children who were forced to

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6/14/2021

Mail - AK Subsistence, FW7 - Outlook

move away and they will be denied teaching their grandchildren how to hunt in the traditional area that their families have hunted for generations. The grandchildren will lose an important link to their traditional and ancestral home when they are not allowed to learn how to hunt with their parents and grandparents.

This area is sadly turning into a summer home vacation spot for wealthy retirees. Southeast Alaska has seen its share of economic hardships over the last 30 years, with pulp mills shutting down, the IFQ program for halibut and black cod making 2nd class citizens out of many young (now not so young) fishermen, salmon farms and increased federal regulations driving down the price of salmon and shortening the season making it nearly impossible to make a living as a commercial fisherman. We've suffered enough. We do not need the Federal Government telling us who can and can't take a deer for personal use. The motivations of the few people who support this proposal are varied but in my opinion none are valid or based on any knowledge of deer harvest number or really any hard knowledge at all of deer management in the area.

The US government should not be required to guarantee anyone deer hunting success and deer hunters who have a long tradition and family history, and who maintain homes in this area should not be made outlaws for harvesting deer around their homes. Legal liability is only one part of a successful game management system. Respect for the law and for law enforcement plays a much larger role than fear of reprisal. When stupid laws are made by stupid people the rest of us look on in disgust and lose respect for the system.

Think carefully before forcing through a new feel good (for some) regulation that is not supported by the majority of residents.

Denny Corbin, Lot 17 & 18 Sunnyside  
PO Box 765  
Pelican, Alaska  
99832

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAH7v...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Unit 4 WP22-07, WP22-08, WP22-09, WP22-10 Proposed closure of  
Blacktail deer seasons to non-subsistence hunters

Ken Couch <kc\_n\_gurls@yahoo.com>

Mon 7/19/2021 5:35 AM

To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

Cc: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to these proposals because there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence or even a reason to believe that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

I am getting tired of RACs, aided and abetted by the Subsistence Office of FWS Region7 continuing to waste public funds on these frivolous proposals to give federally-qualified subsistence hunters a private hunting club paid for by all Federal tax payers. Federal Regulations REQUIRE that the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof. Instead, all this is just wasting tax dollars. Maybe all the non-subsistence hunters should start making frivolous proposals that the RAC has to fight. Then maybe they would not have time to waste time and tax dollars on unsubstantiated claims.

Ken Couch

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAH...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] I strongly oppose proposal WP22-09 SE

Tom Crass <tomcrass@gmail.com>

Sun 7/18/2021 1:28 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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WP22-09 Lisianski Subsistence Deer Hunting Restrictions.

There is no reason for this federal subsistence proposal . My family hunt and hike the hills in the proposed area and have done so for over twenty years. We have not seen a decrease in the deer population, and city of Pelican was approximately 300 people when we first bought our house there, it is currently 60 people. I do not suspect that the deer population is in danger from a few hunters from the surrounding areas ( including Juneau) it is expensive and difficult to travel to Pelican particularly in the fall. The cost and difficulty will keep most out and the black tail deer is not a trophy animal this is not a serious issue .

Tom Crass  
PO Box 302  
Pelican Alaska 99832

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAF...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07/08/09

Elias Daugherty <elias1547@yahoo.com>

Mon 7/12/2021 4:39 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I Elias Daugherty  
Oppose the proposal 22- 07/08/09  
The deer numbers show healthy and Sustainable.

I do think that nNon-residents becoming residents should have a stricter and longer qualification period  
For hunting  
Privileges  
Such as a 5 year stay required.

I also believe if there is a concern about deer numbers being taken that the price for non-resident deer tags should increase. And Stricter non-guided deer hunts.

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQANW...> 1/1



7/1/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

John Demuth &lt;jdemuth@pndengineers.com&gt;

Wed 6/30/2021 5:46 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Attention: Theo Matuskowitz

The intent of this email is to voice my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

The population of deer in these areas (as all areas in SE Alaska and Kodiak) has historically been impacted primarily by weather, and in particular the amount of snow experience in a given winter/early spring – NOT by the small percentage of hunters who may choose to venture further away from towns/areas with greater hunting pressure – i.e. Juneau. When heavy snow kills off deer, EVERYONE feels the impacts due to reduced numbers of deer.

W22-07 in particular is extremely exclusive and excessive as it covers over 70 miles of the west side of Admiralty Island – 40 miles north and 30 miles south. This is simple outrageous. NOBODY in Angoon hunts 30-40 miles from town, but rather they hunt primarily in Mitchell Bay due to the close proximity and favorable weather conditions – i.e. protected from high wind/waves. In addition, the vast majority of hunting pressure on the south end of Admiralty is from Petersburg and Kake hunters – who also qualify as subsistence hunters and hence will continue to compete with Angoon hunters – effectively changing nothing. The proposal clearly is intended to exclude Juneau hunters from hunting on the west side of Admiralty Island and will hence increase hunting pressure on the east side of Admiralty. The intent seems reasonable, but the range/area is far too large and should be reconsidered to be more focused on the immediate area around Angoon.

Thank you for your consideration.

- John DeMuth

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAAPd...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Public Comments Regarding Subsistence Management Program 2022-2024**

Jared Erickson &lt;erickson\_jared@yahoo.com&gt;

Sat 7/17/2021 7:43 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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Public Comments Regarding Federal Subsistence Management Program 2022-2024:

WP22-07

WP22-08

WP22-09

WP22-10

Federal Subsistence Board-

I would like to take this opportunity to voice my opposition to the proposed changes to the above referenced deer hunting regulations in SE Alaska. To manage a population of a targeted animal species for harvest, I do believe it would be a mistake to consider anything other than the health of the population of that species. The ADF&G recently produced a comment response to the above proposed changes and the general trends show that there are fewer FQU's hunting, and they are hunting fewer days per year. The data also strongly suggested that the the Sitka Black Tail Deer populations in the areas referenced above are absolutely healthy and stable. That is, it has been a renewable source of food for all user groups for many years. The above proposals also do not take into account that deer at, or below, the mean high tide mark would still be eligible for harvest by the NFQU user group. I believe that this would actually make the concern worse due to the fact that all hunting efforts in these areas by NFQU's would be focused on the easier deer to harvest. If a NFQU is not allowed to harvest deer at elevation, or via flying into a lake that drains into these areas, the focus will shift to the deer near below the mean high tide level. This would generate the exact opposite effect as what is desired. I also believe it would be very hard to enforce the new proposals. The most concerning example I can think of is what will happen if a deer is shot below mean high tide, but then expires and is recovered above the mean high tide? A difficult scenario and one that invites controversy.

The above areas do have a natural barrier against too much traffic. For the months of concern, the population from Juneau must transit around Point Retreat and navigate Southern Lynn Canal to get to these areas if they are hunting by boat. This is the same body of water that will often prevent the Alaska Marine Highway System from making scheduled trips due to wave height and wind. The FQU's are positioned in the heart of the best hunting areas, giving them distinct geographic advantage.

If the true problem is FQU's not meeting their ANS, there are alternatives to the above proposals. Perhaps the Subsistence Board could consider subsidies to the FQU's in terms of fuel or equipment. Another option may be to liberalize proxy hunting for the communities in need. But if the real reason the FQU is experiencing a decrease in deer harvest rates has to do with fewer hunters putting in fewer days we should not penalize other user groups who use the same resource for the same reasons.

I have been a resident of Alaska my entire life, nearly 45 years, and Sitka Blacktail Deer from the regions above are an important part of calories for myself and my family throughout the year. I would like to voice my support for keeping the hunting regulations as they are and not preventing NFQU's the opportunity to continue to utilize this healthy, renewable source of food in our region.

Sincerely-  
Jared Erickson  
Juneau, AK

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAGq...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments RE: All Southeast deer proposals, including but not limited to WP22-07, WP22-08, WP22-09, and WP22-10

Kyle Ferguson <pabucktail@hotmail.com >

Mon 7/19/2021 5:34 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

As an over 20 year resident of Sitka, and a federally qualified subsistence deer hunter, I would like to state my opposition to the proposals attempting to limit the deer hunting opportunity for non-qualified hunters in Southeast Alaska. My opposition is for the following three reasons:

First, there is no valid scientific reason for the proposed limitations. There are currently no existing or anticipated population concerns for deer in Southeast Alaska. Deer numbers across the region are increasing. With the general pattern of mild winters in the last decade Admiralty, Baranof, and Chichagof deer numbers are as good as they've ever been. In GMU 3 it looks like deer numbers are the best they've been in at least a generation. Scientific study of deer numbers in GMU 4 showed that numbers are high enough to sustain a limit for all residents of 6 deer per year. Anecdotal information from hunters and people who live in Southeast's subsistence communities indicates the general impression of excellent deer numbers.

Secondly, there is no valid social reason for the proposed limitations. In a 7/16/21 article in the Sitka Sentinel members of the Regional Advisory Council were interviewed and stated their rationalizations for these proposals. The reasoning revolved around perceptions of unfairness related to boats and trucks owned by other hunters accessing hunting areas, and perceptions of increased competition and decreased opportunity for federally qualified users. Neither of these points stands up under the scrutiny of facts. No matter who we are, there will always be someone with a better truck or boat than any one of us. Being offended by this reality will make us all a bunch of victim-based thinkers, and in sum are the mere voice of emotions rather than real facts. In regards to the idea of increased competition and decreased opportunity, if anywhere were to qualify for such an idea it would be Sitka, the subsistence community with the greatest numbers of qualified, non-qualified and non-resident hunters. In spite of the greatest numbers of competition, Sitka hunters don't seem to have a problem meeting their subsistence deer meat needs. This fact was acknowledged by Sitka RAC member Harvey Kitka who stated Sitka hunters don't have the problems alluded to by the RAC members from other communities.

In contrast, there are actual social reasons for rejecting these proposals. Deer hunting anywhere, but especially in Southeast Alaska, is a time-honored activity which affords people an opportunity to sustain themselves while enjoying and passing on a heritage that transcends generations. We all live in small towns here. The reality is that for reasons of employment, marriage, medical concerns, education, or various other factors, any one of us could find ourselves with family members living in non-qualified Alaska communities, or down south. I hate to envision a scenario where a grandfather in Sitka, an uncle in Angoon, or father in Kake couldn't take a young person deer hunting because a proposal such as this made it illegal to mentor the next generation.

Lastly, data and facts shows there's no practical reason for the proposed limitations. In the same 7/16/21 Sitka Sentinel article ADF&G biologist Steve Bethune was interviewed. He pointed out some

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

interesting facts related to hunter effort. Across the region it seems hunting pressure is light. Additionally, non-qualified hunter effort has remained stable while hunting effort by qualified subsistence hunters has declined. I don't know why there are presumably less qualified subsistence hunters, or why the same numbers of hunters are hunting less days. But the fact remains that the data shows if anything, hunters in the communities involved in this proposal have even greater opportunity than they did ten or twenty years ago.

Thank you for your hearing and consideration,

Kyle Ferguson, Sitka

sent from [Outlook](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAlsn...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to these proposals

Ron Flint <ron@nuggetoutfitter.com>

Mon 7/19/2021 2:02 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board;

Count me in opposition to the following proposals.

1. western Admiralty from Sept 15 to Nov 30 that includes Hawk Inlet and south WP22-07
2. reduced bag limit for Chichagof (Hoonah and Tenakee, Freshwater Bay) from 3 to 2 WP22-08
3. closure of Lisianski Oct 15-Dec 31 WP22-09

Thank you for your time,

Ron Flint

12070 Cross St.

Juneau, AK. 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAPIS...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments regarding 22-07, 22-09

Peter Flynn <flynn.peter@gmail.com >

Mon 7/19/2021 8:32 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

To whom it may concern,

I am an active hunter from Juneau, AK who would be affected by proposals 22-07 and 22-09. Myself and the group of people whom I hunt with also respect and hold great respect for the subsistence rights of other people in this state and wholly support their right to put food in the freezer. As hunters we hunt what only we can eat, aren't after trophies, and respect the land. We often hunt out of a cabin off the hoonah road system, always enjoying our conversations with neighbors and locals whether on the ferry, on the roads, or in town. We also fly into many of the affected areas, sometimes directly from Juneau sometimes from other local airports, enjoying the cabins and beautifully different terrains that are available there. I am opposed to the aforementioned proposals as I believe there are better tools than closure to ensure that subsistence needs are protected without wholly excluding other parties, especially with such a healthy population of blacktails. Other tools are available that would provide for all affected parties such as altering bag limits depending on your subsistence qualification. Curtailing bag limits for non-subsistence-qualified hunters in these areas would keep subsistence as the dominant harvests while regional hunters from larger towns would be able to participate, as is being proposed in 22-08.

Thank you for your consideration,

Peter Flynn

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAMg6...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07, WP22-08, and WP22-09

Charles Frey <cfrey09@gmail.com>

Fri 7/16/2021 3:36 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

I am firmly opposed to WP22-07, WP22-08 and WP22-09. These proposals rely on hearsay & unscientific data to back up the proposed changes. The Alaska Dept of Fish & game who studies these areas is opposed as they cite healthy deer numbers. In addition, these areas are hard to access & have relatively light hunting pressure. This is pure & simple federal overreach & an attempt to lock down Alaska's wilderness for a self-serving reason by those in charge & those who sponsored these proposals.

Regards,  
Charles Frey

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAIrpV...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WS22-09

Ben Genz <bengenz@yahoo.com >

Mon 7/19/2021 7:43 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to this proposal as there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

Federal Regulations require the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQANBq...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition of proposals 22-07, 22-08 and 22-09

Mary Glaves <Mare\_e86@hotmail.com>

Mon 7/19/2021 1:24 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Dear Federal Subsistence Board,

These proposals do not seem to be being proposed based on science and monitoring of deer populations. ADF&G recently INCREASED the annual bag limit of deer from 4-6 in Port Frederick. FQUs are also allotted an additional month (January 1-31) to subsistence hunt, which actually puts unnecessary pressure on deer during the hardest month of winter for the deer, and the easiest month for someone to harvest a deer as they get pushed down to the beaches. These proposals add unnecessary restrictions to Juneau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

[Mary Glaves](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAKIK...> 1/1



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

July 14, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Hooton".

Shawn Hooton  
Vice President, TSI

*Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945*

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Subsistence proposals for Sitka Blacktail Deer in AK**

Brooks Horan &lt;brookshoran@yahoo.com &gt;

Wed 7/14/2021 9:58 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

 3 attachments (2 MB)

WP22\_09 ADFG comments Draft\_Final.pdf; WP22\_08 ADFG comments Draft\_Final.pdf; WP22\_07 ADFG comments Draft\_Final.pdf;

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

Dear Sir/Ma'am,

I am writing to express my lack of support for the proposed changes to sitka blacktail hunting in SE Alaska. The data just does not support these changes. I understand that the purpose of the subsistence board is to listen to rural residents in AK. I have respect for the decisions made by the board to ensure proper distribution of resources. As a past Kodiak resident, I experienced scientifically sound board decisions first hand, and benefited from them. But in this instance, the data does not support the proposed changes. Take the Lisianski proposal, the hunter data shows that success rates for rural residents/federally qualified users (FQUs) is the best in the state. Given that success rate, the actual number of rural resident hunters has decreased. There is just no mathematical or scientific reason to support this change to limit access to non-federally qualified users (NFQUs). I fear cutting such huge swaths of land out for FQUs will concentrate NFQUs into a smaller area making overall deer management that much more difficult. I strongly oppose these proposals as a scientist and as a resource user. I have attached the ADFG comments which represents the best evidence to support my input. Thank you for your time and for the work you do to ensure that the best science is followed in these management decisions. I hope this comment reaches you before the July 19th deadline and can be considered in your decision along with the comments of my fellow Alaskans.

Very Respectfully,

Brooks Horan

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAMZ...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife proposal 22-08

Aaron Hulett <aaronthenurse@icloud.com >

Sat 7/17/2021 10:14 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Regarding wildlife proposal 22-08 on Chichagoff island in Alaska I would like to voice my opposition. The numbers of deer on the island and harvest data do not support the claims made. This change would have a dramatic negative impact on non-federally qualified users and minimal or no positive effect for federally qualified users.

Thank you,

Aaron Hulett  
1670 Mendenhall Peninsula Rd  
Juneau, AK 99801  
(360)460-4179

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAH%...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition to WP22-07, WP22-08, WP22-09

Brandon Ivanowicz <blvanowicz@pndengineers.com >

Mon 7/19/2021 4:11 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention: Theo Matuskowitz

The intent of this email is to be on record in my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

I support the views of the Territorial Sportsmen, Inc. of Juneau and the Alaska Department of Fish and Game in their opposition to these proposals. Please see the attachment. Thank you. Brandon Ivanowicz.

[There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQPEP...> 1/1

Navigation

# Territorial Sportsmen

Representing the sporting lifestyle of Southeast Alaskans

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## There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters!

Posted on July 17, 2021 by territorialsport in Homepage

Comments on these are due by this Monday, July 19, 2021 (email: [subsistence@fws.gov](mailto:subsistence@fws.gov) or fax: 907-786-3898).

**The first proposal (WP22-07) is a closure of most of west Admiralty Island September 15 – November 30 for Juneau hunters. This includes all areas south of Hawk Inlet. Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

*TSI opposes this proposal and respectively asks that it not be adopted.*

7/21/2021

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

**The second proposal (WP22-08) reduces the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA – Hoonah & Tenakee areas). Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

*TSI opposes this proposal and respectfully asks that it not be adopted.*

**The third proposal (WP22-09) is a closure of Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island October 15 – December 31. Here are TSI's comments opposing that proposal (& supporting ADF&G):**

*The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-09) to close deer hunting in Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island from October 15 to December 31 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.*

*TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.*

*ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort has remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.*

<https://territorialsportsmen.org/there-are-three-federal-subsistence-wildlife-proposals-being-considered-that-will-affect-juneau-deer-hunters/>

2/4

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

Dear Federal Subsistence Board,

The Alaska Department of Fish and Game's Juneau-Douglas Advisory Committee thanks you for the opportunity to submit written testimony on WP22-07, WP22-08, and WP22-09.

Our 15-member citizen volunteer committee represents diverse user groups and perspectives; we have designated seats for people who represent commercial fishing, sport fishing, hunting/personal use, hunting guiding, charter fishing, trapping, as well as non-consumptive users. We strive to represent the interests of our diverse constituencies, holding a half dozen meetings each year to both discuss fish and game issues as well as to create a public forum for consideration of proposed regulations that impact our region. Under the guidance of the Alaska Department of Fish and Game, our body is charged with weighing proposals that will impact State of Alaska Game Management Units 1C, 1D, 4, and 5, but we pride ourselves in thinking inclusively about our broader region.

Like the Federal Subsistence Board and the Regional Advisory committee, we believe we need to support rules and regulations that create equitable and sustainable fishing and hunting opportunity. As a group, we are thankful to have abundant opportunity to fish, hunt, and feed our families from the land, and, for many of us, to earn our living from well managed and abundant fish and ungulate populations. We also recognize and celebrate the cultural significance that fishing, hunting, and gathering have for so many people in our region. While we live in Juneau--and we recognize that there is more pressure on our wild fish and animals close to town--most of us travel regionwide to hunt, fish, and work, and we are especially mindful of the incredibly important role that hunting plays in rural Alaska. Finally, all our discussions and recommendations are underscored by a strong desire to ensure equitable access to wild food well into the future.

We see that there are legitimate concerns raised by those who participated in the meetings that lead to these proposals; indeed, the lack of ferry service and the broader impacts from the Covid-19 pandemic have created real impacts on food security in rural communities. We are not convinced, however, that these proposals best address the issues raised in the comments.

Instead of addressing these very real food security hardships, we worry the proposals could instead amplify tensions between federally qualified and non-federally qualified hunters, straining cultural and family ties between communities in Southeast Alaska. Because residents of our region move between rural areas and especially Juneau for work and school (and demographic trends suggest this movement from rural to more urban areas has been especially pronounced over the last decade), there are significant numbers of now-Juneau-based hunters who return home to villages to hunt with family. As such, these proposals could in fact reduce harvest success for those who need it most. That is, the non-federally qualified hunters who



successfully harvest animals in each of these areas are often former federally qualified hunters who have moved to Juneau, but return home to help put up food for their families.

In each of these proposals, we also concur with Alaska Department of Fish and Game's detailed and well-researched position that the proposals' respective closures to non-federally qualified users are not warranted for conservation concerns. We therefore see these as allocative proposals, serving to limit opportunity for residents of our region.

We look forward to continuing to listen and to understand the concerns raised by federally qualified hunters, and we stand ready to create a forum to discuss ways to address these issues. Such a forum or open dialogue between users across the region would strengthen our shared interest in sustaining the strong connections to the land provided by traditions of hunting and fishing. We would also be happy to work with the Regional Advisory Committee to propose and champion changes through the Alaska Board of Game process that could alleviate some of the problems.

We urge you to maintain consistent access to deer hunting opportunity for residents of our sparsely populated region by voting no on these proposals.

Sincerely,

Juneau Douglas Advisory Committee

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-09**

greg-donica@gci.net &lt;greg-donica@gci.net&gt;

Mon 7/19/2021 12:06 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;; deanna.perry@usda.gov &lt;deanna.perry@usda.gov&gt;

Cc: Norm and Linda Carson &lt;nrcarson@att.net&gt;

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

To Southeast Subsistence Regional Advisory Council:

There have been many personal discussions lately on deer hunting in Lisianski Inlet and Pelican area. Almost to the point of "Hatfield & McCoys" situation.

It seems pretty simple to me. Alaska Fish & Game has done a good job of managing the hunting of deer. The rules and regulations in place are reasonable, practical and effective. Abide by them. Until there is obvious and proven data to verify a severe reduction in deer population, leave it as it is.

ALL hunters should use good judgement when hunting, doing so in a safe manner. They should be aware of and respect personal property, be it a year around residence or a cabin. Don't hunt so near.

There are times when bears are in abundance and their food sources are not. Extreme fall & winter weather can also contribute to more deer being taken by bears. And yet, data does not support any reduction in deer population, due to bears or hunters. Should that ever happen, then cut the limit of deer to be taken. If a hunter knows he/she will not use the amount of deer allowed, take less.

My husband has hunted in this area with other family members who live in Pelican, our son-in-law as well. We have been property owners in Pelican for twenty years. Generations of families still hunt there and hope to continue to do so. They may not be FQU. For some reason, that has been a topic that is causing those who are and those who are not, to be divided and confrontational. Is that really necessary?

Be a legal and responsible hunter.

Please consider this an opposition to WP22-09, and also WP22-07, WP22-08, & Wo22-10.

Thank you,  
Greg & Donica Jerue  
PO Box 211434  
Auke Bay, Ak. 99821

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAKD...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Wildlife proposals 22-07 through 22-09**

Jones Chiropractic &lt;akchiros@gmail.com&gt;

Mon 7/19/2021 10:34 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Federal Subsistence Board  
Office of Subsistence Management.  
Attention: Theo Matuskowitz  
1011 E. Tudor Road, MS-121  
Anchorage, Alaska 99503

Dear Federal Subsistence Board,

I have deer hunted Admiralty Island and Chichagof Island for the last 25 years. From my personal experience, I wholly agree with Alaska Department of Fish and Game's (ADF&G's) assessments on the following proposals.

I oppose the Wildlife proposal 22-07 that attempts to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). I wholly support ADF&G's comments opposing this proposal.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes the actual reason for the decline of federally qualified user (FQU) deer harvests are from a decline in participation and effort by FQU's, NOT depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort is also declining. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQU's, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-07 and respectively ask that it not be adopted.

I oppose Wildlife Proposal 22-08 that attempts to reduce the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA).

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer in NECCUA, ADF&G increased the annual bag limit from 4 to 6 west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer, compared to 3 deer for NFQUs. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-08 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-09 that attempts a closure of Lisianski Inlet, Lisianski Strait, and Stag Bay of Chichagof Island October 15 to December 31.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-09 and respectfully ask that it not be adopted.

Warm Regards,

Resident Hunter of Alaska

--

Dr. Stefanie Jones



10004 Glacier Hwy  
Suite B  
Juneau, AK 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAjov...> 2/3

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP-22 07,08 and 09

David Keller <saltheart76@gmail.com>

Mon 7/19/2021 1:58 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Good afternoon,

I am writing to you today to voice my opposition to proposed regulation changes WP-22 07, 08 and 09. I feel that the changes, if approved, would negatively affect hunters who do not qualify for subsistence permits.

Thank you for considering my comments.

Regards,

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAAIJ7...> 1/1

7/6/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-(8,9,10) comment

elickirby@gmail.com <elickirby@gmail.com>

Sun 7/4/2021 11:00 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hopefully I got the numbers correct for the sections on the deer limits for the areas around pelican hoonah and angoon. I think a reduction in harvest limit like the one proposed in pelican will be more effective while also allowing people like myself(juneau resident) access and use of the forest. Even a reduction to 2 deer per season in these areas would cause a large reduction in the game taken while allowing us to still hunt. The area around the mainland of juneau receives a lot of pressure so the ability to hunt outside has a lot of value for people like me who primarily eat deer, bear, and moose throughout the year.

Thanks for your time and protection of the forests.

Sincerely

Elic Kirby

<https://outlook.office365.com/mail/subsistence@fws.gov/deeplink?popoutv2=1&version=20210628001.07>

1/1

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Changes 22-07 22-08 and 22-09**

Chris klawonn &lt;chris.klawonn@gmail.com&gt;

Fri 7/2/2021 7:18 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Hello,

My name is Chris Klawonn, I live in Juneau and have been a resident in Juneau for a vast majority of my life. I plan on raising my children here, and I have loved the aspect of boating, fishing, and hunting my entire life. I'd like to keep this short and simple as I hope you are busy reading lots of comments on this topic. Closing the back side of admiralty to specifically Juneau residents is unnecessary, and would be costly and near impossible to regulate.

The number of Juneau residents hovers around 35,000, the total number of reported hunters in GMU 4 that reported a harvest in 2019 is 3,377 according to the ADF&G website. Let's assume that every single one of those harvests came from Juneau, which I know from friends and Facebook isn't the case, that's only 1 in 10 people that live in Juneau claiming deer on admiralty. I don't see this as anything near an issue effecting deer population on admiralty. Second, if this proposition did pass you'd need troopers to nearly constantly monitor the back side of admiralty to ensure that nobody is breaking the law. How many officers, boats, and planes would it take to find the few boats from Juneau to genuinely balance the manpower, equipment, and fuel costs.

Please understand, I realize the people's frustration of seeing pictures with a huge commercial fishing boat with 20 deer on the bow, and realize that this is a bit excessive on the taking of such a great resource. Even worse is hearing the wonton waste of deer or really any animals, on this island or in any other location. But to squarely place the blame for this on the residents of Juneau is wrong.

Admiralty island is 1,646.4 square miles, making it the 7th largest island in the United States. Cutting off half of it to one community of 3000 or so hunters isn't right, and I hope you can see my side.

Good luck with your decision and thank you for your time.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAPZ1...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09 Deer Hunting Restrictions Lisianski Inlet

Jerome <rnjk8@gci.net>

Sun 7/18/2021 7:39 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

My name is Jerome A Kristjanson, I have been an owner and occupant of property next door to Jim Slater and have noted the abundance of deer in my yard at various times of the season. I have noted bucks and does in my yard and this has been consistent, not just one or two a month. There are fresh sign weekly from the ones I do not see physically.

I do not hunt, I do feel my neighbors in Juneau (that own or have permission to hunt in the Inlet) and Pelican have the right to harvest legally.

Those that do not wish to share should find other interests to engage in.

Jerome A Kristjanson

14 Salmon Way

Pelican AK 99832

907-723-2863

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQANzt...> 1/1



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Object to Proposals**

Jay/Amy Lloyd <jayamyllloyd@gmail.com>

Mon 7/19/2021 12:28 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to submit my objection to proposals WP22-07, WP22-08 and WP22-09.

The abundance of the animals in the areas as stated by the Alaska Department of Fish and Games objection to the proposals does not warrant this action. Federally qualified hunters also have an extended season that they can hunt these areas. I do not feel that these proposals are necessary or required at this time.

Sincerely,  
Jay Lloyd

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQALXx...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09 Lisianski Deer Hunting Restrictions

Greg Lockwood <greenhoochie@icloud.com>

Tue 7/13/2021 5:15 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I oppose the new restrictions as proposed in WP22-09. I have a cabin along Lisianski inlet but I am not currently a qualified subsistence user. However, hunting is an important part of my Alaskan lifestyle as well as of my children's. We hunt every year together and we are looking forward to many memories of hunting in the Lisianski area.

Additionally, we rely on the health benefits of wild game meat vs store bought meat. I lost my wife 5 years ago to cancer and my children and I work hard to maintain as healthy of a lifestyle as possible. The proposed change will impact our ability to continue to do this.

I personally do not believe the deer herd is substantially impacted by non-subsistence qualified hunters harvesting deer in the Lisianski area and I also believe the proposed change would result in a waste of a resource. I request that a scientific study be performed before making a change that negatively affects some of Alaska's residents.

Thanks,  
Gregory Lockwood  
Juneau AK

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAPSz...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments opposed to proposals WP22-07, WP-08, and WP-09**

David Love &lt;pandalid@yahoo.com &gt;

Tue 7/13/2021 11:51 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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These comments concern Federal subsistence management program's Proposals WP22-07, WP22-08, and WP22-09.

As a hunter who lives in a non-subsistence area (Juneau) but uses sport hunting means to harvest wild game which is an essential source of protein for my annual sustenance, it is my observation (borne out by the ADF&G surveys) that there is not a conservation need to limit sport harvest of deer in any part of Unit 4, Southeast Alaska.

ADF&G Wildlife Conservation has many years of objective, quantitative data that shows that the deer populations in Unit 4 are not depleted, but are in fact at high and stable population levels, even after the heavy snow year of 2020/2021. Restrictions on non-subsistence hunters is not necessary and unfairly targets sport hunters whose numbers and hunt days are stable when NFQUs are declining. Also, the average number of deer harvested in Unit 4 has been stable for all users for 10+ years with good success rates in deer harvested. There is not increasing competition for deer among FQUs and NFQUs.

I urge the Federal Board to NOT support these proposals, and vote to oppose these proposals, since their claims are not true compared to the objective, quantified data showing strong population trends and stable deer harvest in Unit 4.

Thank you for your time, David Love, hunter and resident of Juneau

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQALz8...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Public comments for WP22-09**

Chris Lunsford &lt;clunsford1@gmail.com&gt;

Mon 7/19/2021 12:56 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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July 16, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

I am writing this letter in opposition to WP22-09. I'm a 40+ year Alaskan resident who values what it means to be an Alaska resident. As a child I grew up in Bristol Bay in the 1970's living a subsistence-based lifestyle. I currently reside in Juneau, a non-subsistence eligible community, but still maintain a subsistence lifestyle cherishing the opportunity to harvest the fish and game resources in Alaska. I have hunted the Pelican area for over 15 years and the effects of this proposal would severely affect my ability to harvest deer in Alaska.

The fish and game resources in Alaska are managed for Alaskans by the State of Alaska. Management authority is granted to the Alaska Department of Fish and Game which actively monitors deer populations in Southeast. There is no scientific evidence of a conservation issue for the deer population in Lisianski Inlet. There is also no evidence to suggest changes in effort, harvest, or environmental drivers warrant the need for additional management actions to limit harvest.

In the case of WP22-09, the Southeast Alaska Subsistence Advisory Council failed in its mission to provide meaningful advice to the Federal Subsistence Board. Little to no effort was made to evaluate the claims of this proposal against existing science-based knowledge or to discuss alternative less-restrictive management measures to achieve the proposal's goals. I believe you will receive overwhelming public comment to not support this proposal based on these principles. I encourage the Advisory Council to fully evaluate all proposals before moving forward to the Board to ensure all subsistence users and Alaskans are fairly represented.

Residents who reside in remote villages in Alaska should be offered the opportunity to harvest the State's fish and game resources to the extent possible to ensure a successful subsistence lifestyle. In Southeast Alaska and Lisianski Inlet, this subsistence accommodation for deer includes additional tags (currently six tags) and additional time to hunt (currently January 1-31), which non-subsistence eligible hunters do not qualify for. Until there is scientific justification and overwhelming support to limit deer harvest in Lisianski Inlet, the Federal Subsistence Board should not be taking further action to favor subsistence users.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAF%...> 1/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

I urge to Board to not support WP22-09 based on, 1) available scientific evidence indicates the deer population in Lisianski Inlet is healthy; 2) the current effort and harvest levels in Lisianski Inlet are stable; and, 3) there are current subsistence regulations in place to ensure successful subsistence deer hunting can occur in Southeast Alaska including Lisianski Inlet.

Sincerely,

Chris Lunsford

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAF%...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal - 22-09 - Lisianski

Carmen Magnuson <ckcolacj@hotmail.com>

Sun 7/18/2021 2:05 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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We would like to submit a comment on the above proposal regarding deer hunting in Lisianski Inlet. As Alaskan residents and a public land users, we would like to say, restricting public land from the public is ridiculous just because one rich man wants it all to himself. There is no evidence in the proposal that supports the claim of low deer numbers or hunting success in that area and how such a proposal made it to this point is ridiculous. There is more than enough recourses for everyone to share. My family has a cabin out there and has been hunting there for over 30 years. We would be shocked and appalled if such a proposal passed and that would bring us more questions and suspicions about how such a decision came to pass.

We strongly oppose this proposal and look forward to the failure of it as it should.

Thank you for your time.

Aaron and Carmen Magnuson  
Auke Bay, Alaska

Sent from [Mail](#) for Windows 10  
There

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAIXX...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09

jenandpat@gci.net &lt;jenandpat@gci.net&gt;

Mon 7/19/2021 5:14 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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July 19, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
 Office of Subsistence Management  
 1011 East Tudor Road, MS-121  
 Anchorage, AK 99503-6199

Dear Federal Subsistence Board,

I am writing this letter in strong opposition to WP22-09.

I am an Alaskan resident who has hunted in Southeast Alaska since 1995. I currently reside in Juneau but for many years I lived remote on Baranof Island, living a subsistence lifestyle that made me sympathetic to the associated hardships. Over the last 13 years, I have hunted Lisianski Inlet and the surrounding areas with my best friend, who is a property owner in Lisianski Inlet. Our hunting trips usually take place in December, when our work schedules allow us a short amount of free time from our jobs in Juneau. As I am now a non-federally qualified user (NFQU), WP22-09 would restrict me from hunting between October 15 – December 31 in Lisianski Inlet, Lisianski Strait, and Stag Bay. I believe this proposal is misguided, misinformed and would unfairly exclude Alaskan residents from hunting a healthy and sustainable population of deer. The proposal asserts that the deer population is depressed and that it is more difficult harvesting deer than it used to be because the number of NFQU hunting in the area is higher. The data that ADFG collects shows that each of these points are incorrect.

The proposal states:

1. It has become more challenging for subsistence hunters to harvest sufficient deer.
2. Hunting pressure from non-subsistence hunters has risen.
3. The deer population is depleted.

According to ADFG statistics:

1. Since 2013, the average number of deer harvested per year by federally qualified users (FQU) in the Lisianski area increased and the number of days required for FQU to harvest a deer decreased, i.e., efficiency increased.
2. The number of NFQU hunting in the Lisianski area and the number of deer harvested per year by NFQU has been stable since 1997. The number of hunting days by NFQU has decreased.
3. The deer population in GMU 4 is higher than anywhere else in the state. Multiple ADFG deer abundance indices (pellet survey, alpine counts, and winterkill beach mortality transects) all indicate that the deer population in Game Management Unit 4 is high and stable.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAJ56...> 1/2

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

When comparing the facts with the assertions, it is clear that the basis for the proposal is flawed: FQU hunters are harvesting more deer per hunter and are more efficient than in previous years; the number of NFQU hunters is not increasing; and there is not a deer conservation concern in the proposed area. Considering the inaccuracy of the proposal's assertions, it begs the question of the motivations of the proposer and perhaps indicates other considerations, unrelated to conservation or subsistence needs, may be at play.

I strongly encourage the Federal Subsistence Board to do its due diligence and look at the facts and reject WP22-09. Without careful review of the best available ADFG data, making any decisions would be inappropriate and reactionary. If the proposal were approved as-is, it would unnecessarily and unfairly restrict hunting opportunities for Alaskan residents who cherish the opportunity to hunt and its sustaining results.

Thank you for your consideration,

Patrick Malecha

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAJ56...> 2/2





**BACKCOUNTRY  
HUNTERS & ANGLERS**  
ALASKA

## **Alaska Backcountry Hunters & Anglers Comments on Wildlife Proposal 22-07 and Wildlife Proposal 22-09**

### **Proposed Change to Federal Regulation:**

*"Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations."*

Backcountry Hunters & Anglers advocates for an ecosystem wide approach to land and wildlife management and to ensure that the public landscapes we speak up for remain open to hunting and angling. We are supportive of science-based management decisions and support the responsibility of state wildlife agencies to manage fish and wildlife populations on public and private land. We support and strongly encourage cooperation between state and federal management agencies to maintain robust fish and wildlife populations on Federal public land.

Alaska BHA has reviewed the proposals submitted by the Southeast Subsistence Regional Advisory Council (SRAC), the meeting transcripts, as well as hunter participation, harvest and population data provided by the Alaska Department of Fish and Game. We recommend the Federal Subsistence Board oppose the proposed closure of Federal public lands to hunting of deer by non-federally qualified users. Alaska BHA does not see that there is adequate information related to deer populations and harvest to meet the high burden needed to close Federal public lands or that these proposed closures will necessarily solve the problems identified by the SRAC.

Although we are opposing this proposal, Alaska BHA would like to bring up concerns that we have, some of which were expressed by the Council.

1. The Council expressed concern in the spring meetings that there is a limited selection of tools available for them to use to address their concerns. Several members expressed hesitancy over supporting these proposals due to their concern that they did not necessarily want to limit non-federally qualified users but lacked any other options.
  - a. Alaska BHA would like to express our support of the Council in this regard and we would take this opportunity to support and encourage the concept of agency co-management. We understand the unique situation of subsistence management in Alaska and believe this situation calls for a stronger working relationship between state and federal agencies than is needed in other states where federal agencies are charged with managing habitat on federal land. An uncooperative relationship between state and federal agencies, as has been recently demonstrated in Alaska by ongoing litigation, leaves hunters and anglers to pay the price, regardless of federal status.
2. Data provided by the Alaska Department of Fish and Game shows that participation by federally qualified users (FQUs) and non-federally qualified users (NFQUs) has been decreasing but that FQUs participation is decreasing at a higher rate.
  - a. Alaska BHA believes that the OSM and ADF&G Subsistence Section should be conducting more surveys to better understand why this decrease is



[WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA\\_BHA](http://WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA_BHA)  
[ALASKA@BACKCOUNTRYHUNTERS.ORG](mailto:ALASKA@BACKCOUNTRYHUNTERS.ORG)

- occurring, particularly when Federal land closures are involved. Factors far outside the realm of deer populations and hunt management can affect participation in a hunt and should be considered.
- b. We would like to make the secondary point that decreasing participation rates among hunters and anglers is a concern of our organization. Our Hunting for Sustainability program is focused on ensuring we have future generations of hunters who will speak up on behalf of our lands, waters and wildlife. We do not want people to stop hunting and fishing, regardless of federal status.
  3. Alaska BHA heard from both FQUs and NFQUs who share frustrations about waste of game in areas that receive higher hunting pressure, specifically around the Hoonah road system. When game is wasted it takes away present and future opportunities for both NFQUs and FQUs to put food in their freezers. We encourage Federal and State law enforcement agencies to increase enforcement of existing laws and work with local communities to identify illegal hunting activity.
  4. Backcountry Hunters & Anglers was founded around the need for an organization of hunters and anglers to speak up for an ecosystem wide practice of conservation. The Council discussed several concerns leading up to these proposals that Alaska BHA, out of our concern for ecosystem wide conservation, believes are relevant.
    - a. A general reduction in other available resources causes strain on hunters and anglers, especially those who depend more upon food harvested from the land. Reduced salmon and herring runs means less available opportunities to harvest additional food and increases the need to harvest the food that is available, in this case deer.
    - b. Reduction in resources that other animals depend on increases competition. For example: bears, dependent on robust and healthy salmon runs that are now less consistent, may target more deer and thereby make deer more difficult to harvest.
    - c. We share the frustrations of the Council, and many other Alaskans, over the issue of commercial trawl bycatch when many opportunities around the state to harvest halibut, salmon and other fish to put in our freezers are being limited. This increases strain on both FQUs and NFQUs.
  5. Alaska BHA strongly emphasizes the need for these issues to be addressed and would like to remind both State and Federal agencies of your obligations to manage for subsistence priority, regardless of your definition of user group.

As an organization that counts both federally qualified users (FQUs) and non-federally qualified users (NFQUs) among our ranks, the Alaska Chapter of Backcountry Hunters and Anglers would like to offer our assistance in facilitating long-term solutions to the problems addressed by the Council.



[WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA\\_BHA](http://WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA_BHA)  
[ALASKA@BACKCOUNTRYHUNTERS.ORG](mailto:ALASKA@BACKCOUNTRYHUNTERS.ORG)

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Southeast proposed subsistence deer limitations**

Charlie Martelle &lt;martellec@yahoo.com&gt;

Tue 6/29/2021 10:29 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello,

I am writing about the proposed changes of wp-22 07, Wp-22 08, and wp-22 09. I am not in favor of limiting Juneau residents on these areas. I rely on wild game as my main source of protein. By limiting me and other residents of Juneau we will see an increase in the number of hunters in the areas that are not mentioned. This would mean it would be harder to get away from others and find the game we fill our freezers when we hunt closer to town.

We are already so limited in Juneau with hunting, one needs to either have a boat or charter a float plane to find "good" hunting. By dropping the limit on the road system in hoonah you would essentially take our one hunt that doesn't require owning a vessel or chartering.

From my experience on the coast there is abundant numbers of deer, same with the south west side of admiralty. If there was a shortage of animals I would be all for reducing bag limit, but I do not believe this is the case.

Again I am against any changes to the current regulations.

Thank you for your time  
Charlie Martelle

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQALNz...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal subsistence hunting and trapping regulations comment 2021**

Sarah Matula <s\_matula1@yahoo.com>

Mon 7/19/2021 1:14 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I have been a resident of Juneau for 8 years, and have been lucky enough to have gained relationships with people through out SE. Through these relationships, I have had the opportunity to learn, experience, and put into practice in my own life the respect and appreciation for the substance lifestyle.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

Thank you for your time-  
Sarah Matula, Douglas, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAFPo...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP 22-07; WP 22-08; WP 22-09; WP 22-10

Grey Mitchell <fullcurl@live.com>

Wed 7/14/2021 9:04 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attn: Theo Matuskowitz, Office of Subsistence Management

I am writing to oppose the referenced federal subsistence proposals for deer in Southeast Alaska as listed above. These proposals have no basis, as there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. Without specific data to demonstrate a particular subsistence purpose, these proposals are not only arbitrary and capricious, but they will violate the constitutional rights of non-federally qualified users. The credibility of federal subsistence management of wildlife resources on public lands hinges on the use of scientific data. Not only do these proposals lack scientific data, they lack any data to demonstrate a justified subsistence need. I urge the rejection of these unsupported and unjust proposals. Thank you.

Grey Mitchell  
Alaskan since 1966  
3065 Douglas Highway  
Juneau, Alaska 99801

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAAI9o...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-07, WP22-08, WP22-09**

Richard Morris &lt;akreeldeal@gmail.com &gt;

Mon 7/19/2021 8:40 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Attention Teo Matuskowitz

Good day,

There are a few proposals that I am writing in opposition to.

The first is WP22-07, which proposes to close the western side of Admiralty from Hawk inlet to the southern tip to non-federal users to make it easier for one group to gather food. I also try to fill my freezer with wild game so this would be selecting them over me. Although I have never hunted the area due to its remoteness and difficulty to get to during the hunting season I feel it will be a stepping stone to closing more of the National Forest as they request larger areas to make it easier for them and more difficult for others. I would say that looking at the ADFG hunt records would show that the majority of hunt effort from Juneau is on the eastern side of Admiralty island and any that can make it to the proposed area would say that hunting there is so much more easy than the eastern side. It is all relative.

WP22-08 is the looking to close the northern area of Chichagof island to non-federal users. I bought property in Freshwater bay for the main purpose of hunting. There are already regulations in place that have a harvest limit of 3 deer versus the 6 I could shoot anywhere else on the ABC islands. This is another remote area for someone from Juneau to access and has limited pressure from Juneau as could be found in the hunt records. The majority of deer that are harvested in the area are mainly road hunts as there is an abundance of logging roads throughout the area. As is the case with hunting, it can be challenging for those that don't get out into the forest and expect to fill there freezer shooting deer on the side of the road. Closing this area would impact the value of my cabin and experiences that come with having it there.

WP22-09 is looking to close other areas in the Hoonah area. Again, due to the remoteness this area does not get a lot of pressure from non-federal users.

In closing, these three proposals are trying to make harvesting deer a sure thing for the communities of Angoon and Hoonah. It is hunting, there are no guarantees that you will see a deer, let alone harvest one. Closing these areas will only benefit a few, and probably only to a small degree. These

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAN1n...> 1/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

areas are in the Tongass National Forest, which is to be managed for all user groups. With these proposals it will start to be managed for the select few and I oppose it.

Thank you,

Rich Morris

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAN1n...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments on WP22-09**

Jamal Moss &lt;jamalmoss@gmail.com&gt;

Fri 7/16/2021 8:32 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

Cc: Jamal Moss &lt;jamalmoss@gmail.com&gt;

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July 16, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz

Office of Subsistence Management

1011 East Tudor Road, MS-121

Anchorage, AK 99503-6199

I am writing this letter in opposition to WP22-09. I'm an Alaskan resident who has owned a home just outside of Pelican since 2006 but spent the majority of the year in Juneau because of my job. I have been hunting Lisianski Inlet and Lisianski Strait since 2006. The current proposal restricting deer hunting in Lisianski Inlet only represents the view of a select few and is not based on the data ADF&G collects to manage the resource.

The deer population in Lisianski Inlet and Lisianski Strait rises and falls with some years proving more abundant than others. The amount of deer I encounter in a given year appears to have more to do with the amount of snowfall and inclement weather than anything else. Heavy snowfall forces deer to lower elevations, making them easier to harvest, which increases mortality. However, I have found it relatively easy to harvest deer in years following heavy snowfall years, which gives me confidence that the deer population in Lisianski Inlet and Lisianski Strait is healthy.

Access to the hunting grounds that I have enjoyed for almost 2 decades would be severed under WP22-09 which would have an extremely negative impact on me. It is my firm belief that the deer population in Pelican is not threatened. It appears that ADF&G does not believe this population is threatened either, as the bag limit for this area last year was 6 deer per hunter. I encourage the federal subsistence board to review the science, consider ADF&G's assessment of the deer population in Lisianski Inlet and Lisianski Strait, and reject WP22-09. There is no

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0Y2Y0NWl3MDNJZQAQAA8...> 1/2



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

data suggesting that the deer population is in jeopardy or that hunting pressure has increased over the past several years.

Sincerely,

Jamal H. Moss

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YJQxLWE0YzY0NWI3MDNJZQAQAA8...> 2/2

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal 22-07, 22-08, 22-09

Michael Nelson <michaelbn78@gmail.com>

Thu 7/1/2021 2:49 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing in opposition of these specific proposals, Wildlife Proposal 22-07, Wildlife Proposal 22-08 and Wildlife Proposal 22-09.

These proposals discriminate against Juneau residents unjustly. Excluding the small percentage of Juneau residents that have the ability to hunt in these areas will not increase subsistence means.

Michael Nelson  
208-755-7618

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQABsq...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP22-08 comments**

nicholasporr &lt;nicholasporr@yahoo.com&gt;

Sun 7/18/2021 11:34 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

I am writing to urge the board not to pass proposal WP22-08, which would reduce the bag limit to 2 deer for non-federally qualified hunters. There is no shortage of deer in the hoonah area nor are non-federally qualified hunters displacing Hoonah hunters. I understand that last November was quite challenging for all hunters, though this is likely due to the ice storm that passed over northern southeast Alaska. In addition to being unnecessary for federally qualified hunters to meet their subsistence needs, this proposal will needlessly affect a number of cabin owners in Freshwater Bay. These hunters are typically not hunting the road system and are not placing any pressure on road system deer. For these reasons, I ask the board to not pass this proposal.

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7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07,08,09,10

Tom Radandt <tomradandt0@gmail.com>

Fri 7/9/2021 2:52 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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There is no scientific evidence that supports the idea that non-Federally qualified users impact the success of qualified users. Therefore you must reject proposals 22-07, 22-08, 22-09 and 22-10.

To favor one group over another bases on any political characteristics is discrimination, which illegal.

Tom

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAEqr...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] FEDERAL SUBSISTENCE BOARD STATE OF ALASKA WP22-99 LISIANSKI  
INLET DEER HUNTING**

Mini Reink &lt;mreink38@gmail.com&gt;

Sat 7/10/2021 11:51 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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opening attachments, or responding.**

Although I have only been a resident of Pelican since d1998 this has become a very dear home to us and the families that live here. These families also have others who live in extended areas ex:juneau.

Should WP22-09 PASS this would restrict deer hunting in our area after October 15th to only those residents that meet the qualifications for a Rural Federally Qualified hunter. Only two communities in SE Alaska do not meet the RFQ standard, Juneau and Ketchikan.

ADF&G states the deer population in our area is not at all threatened; there is no conservation issue, Further, the study shows that subsistence hunters in our area are more successful now than in previous years.

This spring we have seen many deer around our local beaches. The fall & early winter of 2020 was unusual in weather; it was very wind & warm. There was not an early snow pack to bring the deer down to lower elevations;this had a detrimental effect on hunting.

WP22-09 SHOULD NOT BE PASSED.

Mini & Tom Reink  
[mreink38@gmail.com](mailto:mreink38@gmail.com)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAH34...> 1/1



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436  
email [info@residenthuntersofalaska.org](mailto:info@residenthuntersofalaska.org) web [www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)

July 19, 2021

To: Federal Subsistence Board  
Office of Subsistence Management  
(Attn: Theo Matuskowitz)  
1011 E. Tudor Road, MS-121  
Anchorage, Alaska 99503-6199

Re: Federal Subsistence Board 2022-2024 Wildlife Proposals and Existing Closures

Dear Federal Subsistence Board Members,

Resident Hunters of Alaska (RHAK) represents several thousand members from across the state, rural and urban, who advocate for sustainable wildlife management policies and a resident hunting priority according to Article 8 of our state constitution.

RHAK participates in Regional Advisory Council (RAC) meetings and Federal Subsistence Board (FSB) meetings, and we have become alarmed at the continuing wildlife proposals and special action requests that are not based on actual biological emergencies or conditions that would prevent federally qualified subsistence users (FQU) from meeting their subsistence needs.

What makes any FSB closures and restrictions especially problematic is that there is no differentiation in the federal system between Alaska residents and nonresidents from another state or country; both Alaska residents and nonresidents are deemed the same under federal regulations by definition of a who is a FQU. A prime example of why this is so problematic is that often complaints about competition from non-local non-federally qualified subsistence users (NFQU) center on the nonresident component, which can often comprise the majority of NFQ hunters participating in these hunts. So, when any restrictions or closures on federal lands happen, Alaskans who used to live in a designated rural area but for whatever reason have moved to more urban areas of the state, can't return home to hunt and carry on their traditional hunting activities on federal lands, nor can other Alaskans participate in these hunts.

It has always been RHAK's position that when and where we have wildlife conservation concerns or subsistence opportunities are not being met, that the ***nonresident component should always be the first group of hunters***

Page 1 of 3

*Resident Hunters of Alaska Comments  
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures*

**restricted.** If other restrictions are still necessary, only then can we support restrictions on resident hunters.

We have always advised RACs to first use the Board of Game (BOG) process when and where there are concerns with too much competition from non-local NFQ hunters, as the BOG can differentiate between Alaska residents and nonresidents.

### **Comments on Individual Proposals and Existing Closures**

**WP22-07** Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.

#### **OPPOSE**

The rationale of WP22-07 is not based on any biological data or harvest statistics that show a conservation concern for the deer population on Admiralty Island or that subsistence needs are not being met.

According to Alaska Department of Fish & Game (ADF&G) data, over the last decade we have had mild winters in Game Management Unit 4 and the deer population is “*high and stable.*” The deer population on western Admiralty Island is **not** depleted, as the proposal states. Nor are there any conservation concerns for the deer population under the current hunting regulations.

The proposal also states that there has been increased “*hunting pressure*” from NFQ hunters and it has “*become more challenging for subsistence hunters in Angoon to harvest sufficient deer for their needs.*” But according to ADF&G data, over the last two decades there has been a **decrease** in both the number of FQU and NFQU.

The FSB operates under ANILCA guidelines and the federal code of regulations that govern when and why any closures to NFQU can happen: “*With respect to subsistence uses of a particular fish or wildlife population, the Board may only approve a proposed closure if necessary for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA §816(b), 36 CFR 242.10(d)(4)(vii) and 50 CFR 100.10(d)(4)(vii)).* **Meanwhile, the Board may approve a proposed closure of nonsubsistence uses of a particular fish or wildlife population for any of these same reasons, or if necessary for the conservation of healthy populations of fish and wildlife,**

Page 2 of 3

*Resident Hunters of Alaska Comments  
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures*

**or to continue subsistence uses of such population (ANILCA §815(3), 36 CFR 242.10(d)(4)(vi) and 50 CFR 100.10(d)(4)(vi)).”<sup>1</sup>**

The Board should vote down this proposal based on the above guidelines of when any restrictions or closures on federal lands for NFQU are allowed to happen.

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**WP22-09** Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.

**OPPOSE**

Refer to our comments on WP22-07

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**WCR22-01 Deer** Prince of Wales closed Aug. 1-15, except by Federally qualified subsistence users; non- Federally qualified users may only harvest 2 bucks

**Rescind closure to NFQU on Price of Wales Island**

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**WCR22-45 Caribou** Unit 23 - Portions of Unit 23 - closed to non- Federally qualified users

**Rescind closure to NFQU in those portions of Unit 23**

---

Thank you for the opportunity to comment.

Sincerely,

Mark Richards  
Executive Director Resident Hunters of Alaska

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<sup>1</sup> <https://www.doi.gov/sites/doi.gov/files/uploads/closure-policy-revised-2020-08-04.pdf>



6/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wp22-09 and WP22-10 comments

Shane Ring <shane@apexlodge.com>

Fri 6/18/2021 7:10 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

I'm writing to oppose the new proposed regulations for Lisianski inlet WP22-09 and WP22-10.

I am a resident of Pelican and actively hunt in the area every year.

For one, the smaller harvests are less due to shortages of deer. And more of a lack of snow problem.

Residents of Pelican, for the most part, hunt and shoot deer from their skiffs or front porches. Only a few actively hike, and target them in the forest.

The first heavy snow pushes deer to the waters edge. But that hasn't happened during the hunting season the last few years. Thus a lower harvest.

Secondly, there is a very large amount of aging, older, former residents of Pelican who come and hunt the area every year in the fall. Who keep places in Pelican, but have their main homes in Juneau for health reasons. I think it would be immoral to take those opportunities away. As fall is the easiest hunting for them.

Thirdly, the residents of Pelican do not rely on deer meat to survive through the winter. We are on the AMHS, and get grocery runs on a monthly basis. Yes it's popular, but if there was no deer hunting, they would be just fine.

Fourthly, I myself, and many others, do not want to have extra hoops to jump through with federal regulations and oversight. It makes things overly complicated.

Lastly, these proposals have been pushed by the wealthier residents of the area who do not like anyone visiting. And would do away with all tourism (hunting, fishing, or otherwise) if they had the opportunity to do so.

There is literally zero business that goes on during that time of year otherwise, and would bring less visitors to town. Less fuel dock sales, less people who visit and support the cafe and gift shop.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQADIC...> 1/2

6/21/2021

Mail - AK Subsistence, FW7 - Outlook

I would suggest a compromise, and that you ban non residents from hunting within 100 yards of the coastline after Oct 15.

This would keep boat hunters from Juneau, and other places, from driving around and shooting deer enmasse from their vessels. Competing with locals. But give opportunity to those who will work for it.

That's all,

Thanks,

Shane Ring

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YJQxLWE0YzY0NWI3MDNJZQAQADIC...> 2/2

July 1, 2021

To: Federal Subsistence Board, State of Alaska  
subsistence@fws.gov

Re: WP22-09, Lisianski Inlet Deer

My family and I have a summer/fall cabin down the Lisianski Inlet located near Phonograph Creek and we have enjoyed the beauty of the area since my in-laws first purchased the property in 1981. Since then we have made some major improvements to enable us to spend more time there with our children and grandchildren. Both of our children and now our grandchildren have learned to hunt with their parents and grandparents in this area.

WP 22-09 would restrict deer hunting to only those residents that meet the qualifications for a Rural Federally Qualified hunter. Juneau and Ketchikan are the only two communities in Southeast Alaska that do not meet the RFQ standard.

The Department of Fish and Game, who conducted a recent study, stated that the deer population in our area is not at all on the verge of being threatened. My family has been successful in this area for a number of years. In previous years the deer population was scattered due to the adverse weather conditions - windy and warm is not a good mix for deer hunting in the lower elevation areas.

Please do not pass WP22-09.

Sincerely,  
Mary Robidoux  
PO Box 33099  
Juneau, Alaska 99803

6/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Re: WP 22-09 & WP 22-10, GMU 4

Mary Robidoux <maryrobidoux333@gmail.com>

Mon 6/21/2021 8:22 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: Clay Robidoux <robidoux@gmail.com>

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Hello -- I wish to address Wildlife Proposal 22-09 and 22-10 in Game Management Unit 4 which is proposed for the Lisianski Strait/Inlet and Pelican area.

Some background: My parents were lucky enough to purchase land in this area through a lottery draw in the early 1980s. Our site is listed as Lot 2, Blk 4 of Alaska State Land Survey #80-183, Phonograph Creek, containing approximately 2.5 acres. We constructed a cabin there and it became my parent's spring, summer and fall place of residence. In the late Fall and winter months (August through December), we enjoyed hunting there too.

After my parents passed away, it became my family's summer and fall retreat with many enjoyable moments spent fishing and hunting with our children and grandchildren as our family grew.

Because we are residents of Juneau, the proposal would severely restrict our ability to hunt there during those months. Being able to pass down family traditions through hunting and fishing is very important to us. The proposal would affect this greatly.

As I mentioned above, my family enjoys all the outdoor activities that this area provides and we honestly have not seen a reduction in the number of deer population. It's my observation that there are more bears in the Phonograph Creek area, however, than there have been in the past.

Please do not change the regulation as it stands now as I believe allowing subsistence hunters to have that extra month (January) is more than sufficient to meet the needs of those whom this affects.

Sincerely,

Dwight Robidoux  
PO Box 33099  
Juneau, Alaska 99803  
(907) 209-6017  
[br2@pci.net](mailto:br2@pci.net)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAL3e...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**

Mark Sams &lt;msams@pndengineers.com &gt;

Mon 7/19/2021 7:53 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Attention: Teo Matuskowitz

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this change to the deer hunting regulations on the Chatham straight side of Admiralty Island. The regulation will only isolate one user group which has a very low impact on the area due to the distance from Juneau. Due to the distance Juneau residence do not regularly access this area since it is more than 1.5-2hr run time. All other local communities are subsistence communities including, Petersburg, Kake, Tenekee, and Hoonah, leaving Juneau, the furthest community from the location a user group that would be isolated. I think it would be very easy to look at the hunting records collected by the state of Alaska every year to determine how much pressure Juneau actually has on the location to determine how much this change in regulations would actually effect the overall hunting pressure.

WP22-08

I oppose this change to the northern Chichagof Island since it again singles out a single user group. I currently Own a cabin on norther Chichagof Island but am a Juneau resident. This proposed change would limit my access to deer hunting at my cabin which I have invested heavily in over the past 5 years to use as a place to hunt. For me, the area is difficult to access from Juneau due to weather and distance, over 2hrs. Again if you look at hunting records, I believe you would find Juneau residences have a limited impact on the overall harvest on Norther Chichagof Island.

WP22-09

I oppose this change in regulations for closing deer hunting in Lisianski Inlet. This area is also very remote and very difficult for non-subsistence hunters, Juneau residence, to access. Hunting records should show that this area is seldomly access from Juneau this time of year due to weather so this proposal will have little effect on competition. The only residences this change will effect are from Juneau since access is limited to Pelican and Elfin Cove.

In general I believe instating restrictions that only effect one group is a poor decision that becomes a slippery slope for other communities to make similar requests. Pretty soon, Juneau would have very limited hunting locations in a National Forest that is supposed to be managed for all user groups. If subsistence user groups are having difficulty harvesting deer, maybe that's an indication that the bag limits for all groups are to high and a better proposal would be to limit all harvest verses a single user group that has low impact on all three proposed areas. Another option would be to limit the ability to proxy hunt. I know fishermen can go out and

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAOU...> 1/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

get to these remote places in the winter and shoot more deer than their limit due to proxy hunting. I understand the need for it in certain instances, but maybe limiting the number of proxy tags allowed to hunt at one time would help spread the pressure out over a longer period and less deer would be harvested. This would reduce the overall pressure and competition for sub-subsistence harvesters.

Historically these areas being proposed, as all deer habitat, is far more effected by weather and old growth timber harvests (heavy snow and large scale timber clear cuts) than the limited number of hunters. When these environmental and man-made (timber harvest) factors affect the population, all hunters are effected equally.

These proposed changes will also hurt any non-resident hunting charters that are based out of these local communities, hurting the local economies. Non-resident hunters will bring a large boost to these small communities at the end of the typical tourist season helping fortify the community with funds to weather the winter. Out of town hunters will not use Angoon based on the proposed WP22-07 since they would be very limited in hunting locations.

Thank you for taking the time to read my comments.

Mark Sams

Owner of Cabin in Freshwater Bay, Directly effected by 2 out of three of these proposed changes.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fd/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAou...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212

CHARLES SCHULTZ <cjs16@me.com>

Sun 7/18/2021 3:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attention Theo Matuskowitz,  
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12. Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoonah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration. Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration ,  
Charles Schultz  
Juneau, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAD6p...> 1/2

SCI Alaska Chapter  
Eagle River, Alaska 99577  
Cell (907) 903-8329  
Tel: (907) 980-9018  
[www.aksafariclub.org](http://www.aksafariclub.org)



July 19, 2021

Federal Subsistence Board  
Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

[Electronic Submission]  
[subsistence@fws.gov](mailto:subsistence@fws.gov)

RE: SCI-AK comments on Wildlife Proposal 22-08 Hoonah

Dear Chairman Matuskowitz,

The Safari Club International Alaska Chapter (SCI-AK) writes in opposition to Wildlife Proposal 22-08 (WP22-08). Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI-AK is nationally and internationally recognized for its contributions in support of SCI's four major mission areas: Advocacy, Conservation, Education, and Humanitarian Services.

WP22-08 is counter to our goal of ensuring fair and equitable access to game resources in Alaska. The below comments focus on the indices of deer abundance, deer hunter effort, and harvest in Alaska Game Management Unit 4 (GMU 4) as reasons to reject WP22-08.

The proposal claims that non-federally qualified users (NFQU) are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer in GMU 4. WP22-08 asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Alaska Department of Fish and Game (ADF&G) analysis of deer population, hunter effort, and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5), excluding Juneau and Ketchikan, are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game increased the deer bag limit in GMU 4 from 4 to 6 deer because of the GMU's uniquely healthy population of Sitka black-tailed deer.

GMU 4 consistently shows a high black-tailed population. Pellet group counts are usually well above the high-density threshold and are often double the counts in other GMUs. Aerial surveys — measured in deer/hour sighted — were conducted for two locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska and estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe

*Safari Club International Alaska Chapter  
First for Hunters - First for Wildlife*



winters. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Yet, based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

GMU 4 Sitka black-tailed deer are usually above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns. Taken together, these indices of deer abundance — pellet group surveys, alpine counts, mortality transects — suggest this proposal cannot be based entirely on a conservation concern.

Overhunting is often used as a justification for area closures or implementation of restrictive conservation measures. ADF&G produces estimates for hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. From 1997-2019 the estimated average annual harvest in GMU 4 has been 5,725 deer taken by 3,282 hunters. GMU 4 supports the highest deer harvest in the state and the historical harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs. From 1997 to 2006, FQUs harvested on average 152 deer annually. Since 2013, FQUs have harvested an average of 49 deer annually. This represents an approximate 70% decline. There is a similar pattern for NFQUs, who averaged 349 deer annually from 1997-2006. Since 2013, that average has declined to 115 deer annually. SCI-AK notes hunter numbers are decreasing across the board on a national level, not just in Alaska or even GMU 4. This proposal will further restrict access for hunters and lead to a further decrease in the number of hunter's in one of the state's most viable hunting regions.

The Alaska Board of Game has also established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law, ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The board establishes an ANS for a game population through review of long-term population and harvest information. With deer harvest levels within the recommended ANS range, the argument that the closure needs to occur in order to benefit ANS users is moot.

SCI-AK members are especially supportive of family hunting traditions because learning to hunt starts with family and community mentors. FCU status is not inherited. Children who leave federally qualified communities to attend school elsewhere will be excluded and harmed by WP22-08. In November, many FCUs invite their family members home for peak season deer hunts. Other NFCUs return to traditional hunting areas to harvest deer on state hunting proxies or kill deer on their limit to share with family, friends, or elders. None of this use would be allowed to continue in the WP22-08 area if it is passed.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters, and field observations by management biologists, the department has concluded that there is no conservation concern for the GMU 4 deer population. With deer population remaining high and stable, harvest within its historical range, and state ANS requirements being met it is unnecessary to restrict hunting in GMU 4 to the benefit of a small handful of users. WP22-08 will reduce the amount of deer meat coming into communities while simultaneously failing to provide conservation benefits to an already healthy deer population. SCI-AK urges you to not adopt WP22-08.

Thank you for your consideration.

**John Sturgeon**  
**SCI Alaska Chapter President**  
 E-mail: [president@aksafariclub.org](mailto:president@aksafariclub.org)  
 Cell: (907) 230-0072

*Safari Club International Alaska Chapter*  
*First for Hunters - First for Wildlife*

Response to 2022 Wildlife Proposed Regulation Change WP22-09

From: Al Steininger  
(907)209-8508  
al\_steininger@yahoo.com

Proposal WP22-09 would close deer hunting in Federal public lands draining into the waters in the Pelican area between October 15th and December 31st except by Federally qualified subsistence users. The reason given for this proposed change is that over the past years it has become more challenging for local subsistence users to meet their needs. This reasoning goes on to say that hunting pressure from non-subsistence hunters has increased.

This proposal should not be approved. There is not a conservation issue with deer populations in this area. The reasoning for this proposal did not provide any documentation of decreased deer populations. This reasoning is hearsay and contrary to studies by the Alaska Fish and Game (ADF&G) that state the deer population is high and stable in this area.

This proposal will restrict hunting access for the part time residents and cabin owners who are non-subsistence hunters. Many of these non-subsistence hunters are property owners, such as myself, who have homes and cabins in the Pelican area. I purchased the property in 2010 and finished building my cabin two years later. I am one of the most recent property owners to do so. Hunting pressure has not noticeably increased from non-subsistence hunters by local property owners. ADF&G found deer hunting effort and the potential for competition between subsistence hunters and non-subsistence hunters in this area has substantially declined, not increased.

I would like to think that part time residents and cabin owners help support the community of Pelican by employing local labor for building projects, paying for city services, eating at the local cafe, using commercial air travel services, supporting the AMHS ferry system, etc.

This proposal is possibly the result of a dispute between a full-time resident and a neighboring cabin owner who hunted unknowingly onto the other's property. If this is correct, this may have been avoided by the resident adequately posting his property.

This proposed change was made without documentation. In response to this proposal, ADF&G documented and indicated that deer populations are healthy and hunters in this area experience the most efficient deer hunting in Alaska and there is not a conservation issue. Local part-time residents and cabin owners will be negatively affected by this proposal.

Again, this proposal should not be approved. Thank you.

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Subsistence Hunting Closure**

Peter Strow &lt;pstrow@hotmail.com&gt;

Mon 7/19/2021 5:20 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

Hello,

I would like to submit a comment regarding the closure of hunting to Juneau residents for WP22-07, WP22-08 and WP22-09. I don't believe these areas should be closed to Juneau hunters. Accessible hunting is difficult in Southeast Alaska and many Juneau residents depend on hunting deer in these areas. Proposing these closures should be backed by scientific data and I think this needs to be further studied before any closures are passed.

Thank you,  
Peter Strow

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAE3q...> 1/1



July 16, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199

RE: Comments on WP22-07 Closure to non-Federally qualified users, Admiralty Island; WP22-08 Place a harvest restriction on non-Federally qualified users, Northeast Chichagof Controlled Use Area; WP22-09 Closure to non-Federally qualified users, Lisianski Strait; WP22-10 Lower harvest limits for non-Federally qualified users, Lisianski Strait;

Dear members of the Federal Subsistence Board:

The Sportsmen's Alliance is a leading national organization that defends the right of our members to hunt, fish and trap in all 50 states. I am writing today to urge you to use sound scientific evidence to discharge policy related to changing existing hunting seasons, harvest limits and methods and means of taking wildlife related to federal subsistence hunting and trapping and more specifically proposals WP22-07, WP22-08, WP22-09 and WP22-10.

The Sportsmen's Alliance strongly believes that if populations are abundant than all public land users in the Alaska should have access to these lands for hunting and trapping. These lands are managed and conserved using public funds contributed by sportsmen across Alaska and the United States through license fees and excise taxes paid on the purchase of firearms and other hunting equipment.

When determining whether to close certain federal lands to land users that are non-subsistence hunters, the Alliance on behalf of our Alaska members urge you to follow scientific evidence and population data to determine the best course of action. If wildlife populations numbers indicate abundant numbers of game species these lands should remain open to both subsistence hunters and non-subsistence hunters. The North American Model of Wildlife Conservation dictates that science should be the guiding tool for discharging wildlife policy and our membership stands firmly on the principles of this model.

We understand the complex nature of this decision, so we urge you to make these determinations based solely on science and not based on political or social pressure. Thank you for the opportunity to comment on this issue and thank you for your time.

Best,

Jacob Hupp  
Sportsmen's Alliance  
Associate Director of State Services

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comment on WP22-08, WP22-09, WP22-07

John Unzicker <jmunzicker@gmail.com>

Wed 6/30/2021 8:56 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Hello,

This comment is regarding the following proposals:  
WP22-08, WP22-09, WP22-07

We are all Alaska state residents and have the right to utilize all of the state land regardless of our primary residence. As a lifelong Juneau resident who pays the same fees to hunt game in SE AK as anyone else in the state, I am extremely discouraged by these proposals.

Juneauites would be forced out of major hunting areas during the prime time of the season. If Juneau residents are not allowed to hunt the far, outlying areas, we will all be forced to hunt the immediate areas around Juneau which will result in over-hunting, overcrowding, and less game around Juneau. This proposal is absolutely inequitable and will divide communities.

What about hunters who have cabins or family in Hoonah, Pelican, or Angoon? This is absolutely wrong and only goes to serve a very small population of the state. Residents of Juneau have just as much right to hunt these zones as the residents of Hoonah, Pelican, and Angoon have the right to hunt anywhere in the state. There is enough wildlife and land for everyone to utilize for subsistence and it should be shared equally.

And does this mean that any other resident not from Juneau can hunt these areas? Sitka? Haines? Gustavus? Petersburg? Why only Juneau?

Thank you,  
John Unzicker  
2016 Glacier Bear Blvd.  
Juneau, AK. 99801  
907-723-3191

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAMTa...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] proposals WP22-7, WP22-8 and WP22-9

Luke Woodruff <alaskan\_waters@yahoo.com>

Wed 6/30/2021 9:23 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Please do not consider the new proposals WP22-7, WP22-8 and WP22-9 as new regulation. I do not believe the current deer harvest levels combined with predation/winter kills deem this kind of proposal necessary. Subsistence and non subsistence communities alike count on deer as a part of their diet along with fish, water fowl and berries. Every year is different, sometimes hunting is difficult and other times not. Let's avoid creating regulations that favor one group over another because one group thinks they are having to work harder.

Luke Woodruff  
Juneau, AK

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQANW...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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

Attn: Theo Matuskowitz,  
Office of Subsistence Management  
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska  
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. Limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris  
P.O. Box 32403  
Juneau, Alaska 99803

*Richard Harris*

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/fid/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAOyD...> 1/2

<b>WP22-11 Executive Summary</b>	
<b>General Description</b>	WP22-11 requests that the Federal regulation for mountain goats in Unit 5A remainder be changed to remove the following language: a minimum of 4 goats in the harvest quota will be reserved for Federally qualified subsistence users. <i>Submitted by: the Southeast Subsistence Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<p><b>Unit 5A, remainder – Mountain Goat</b></p> <p><i>1 goat by Federal registration permit. The Aug. 1 - Jan. 31 harvest quota will be announced prior to the season. A minimum of 4 goats in the harvest quota will be reserved for federally qualified subsistence users.</i></p>
<b>OSM Preliminary Conclusion</b>	<p><b>Support</b> Proposal WP22-11 <b>with modification</b> to remove the language describing an announcement of the quota from unit-specific regulations and maintain in the delegation of authority letter only (<b>Appendix 1</b>).</p> <p>The modified regulation should read:</p> <p><b>Unit 5A, remainder – Mountain Goat</b></p> <p><i>1 goat by Federal registration permit.—The Aug. 1 - Jan. 31 harvest quota will be announced prior to the season. A minimum of 4 goats in the harvest quota will be reserved for federally qualified subsistence users.</i></p>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	None



## DRAFT STAFF ANALYSIS WP22-11

### ISSUES

WP22-11, submitted by the Southeast Subsistence Regional Advisory Council, requests that the Federal regulation for mountain goats in Unit 5A remainder be changed to remove the following language: a minimum of 4 goats in the harvest quota will be reserved for Federally qualified subsistence users.

### DISCUSSION

The proponent states that the current regulation is cumbersome and difficult for in-season managers to effectively implement. A static number (4) relative to a quota that fluctuates based on the current (most recent available) population data is not an appropriate management directive (does not reflect sound management practices). Effort and harvest are low by both Federally qualified subsistence users and non-Federally qualified users. Subsistence demand has been met without actively “reserving” animals for harvest. Subsequently, this regulation is not necessary and needlessly complicates regulations for both managers and users. The in-season manager (Yakutat District Ranger) has the authority/flexibility to manage the harvest without this regulation. Further, priority for Federally qualified subsistence users is provided by a longer season. The proponent states that this change will simplify the regulations for both Federally qualified subsistence users and managers.

#### Existing Federal Regulation

##### Unit 5A, remainder—Mountain Goat

*1 goat by Federal registration permit. The harvest quota will be announced prior to the season. A minimum of 4 goats in the harvest quota will be reserved for federally qualified subsistence users.* Aug. 1-Jan. 31

#### Proposed Federal Regulation

##### Unit 5A, remainder—Mountain Goat

*1 goat by Federal registration permit. The harvest quota will be announced prior to the season. ~~A minimum of 4 goats in the harvest quota will be reserved for federally qualified subsistence users.~~* Aug. 1-Jan. 31

## Existing State Regulation

### Unit 5—Mountain Goat

*Residents and Nonresidents: 1 goat by registration permit only (RG170); the taking of nannies with kids is prohibited. Aug. 1-Dec. 31*

## Extent of Federal Public Lands/Waters

Federal public lands comprise approximately 98% of Unit 5A and consist of 31% National Park Service (NPS) managed lands and 67% U.S. Forest Service (USFS) managed lands (see **Unit 5 Map**). The area east of the Dangerous River is comprised almost entirely of Federal public lands, apart from two Native allotments and a Sealaska Corporation private parcel, all near Cannery Creek west of the Alsek River.

Federal public lands within Glacier Bay National Park are closed to all hunting, including the hunting of wildlife for subsistence uses.

## Customary and Traditional Use Determinations

Rural residents of Units 1-5 have a customary and traditional use determination for mountain goat in Unit 5.

## Regulatory History

Proposal WP02-13, submitted by the USFS, requested that Unit 5A be split into four submanagement areas, subsistence harvest quotas for each area be established, and the goat season close by announcement when the quota is reached. The Federal Subsistence Board (Board) adopted this proposal with modification to establish two hunt (submanagement) areas; the Nunatak Bench (area between the Hubbard Glacier and the West Nunatak Glacier on the north and east sides of Nunatak Fjord) and Unit 5A remainder, and added a four goat quota for Federally qualified subsistence users in Unit 5A remainder. The Board adopted the four goat quota to ensure subsistence harvest opportunity in the event of unanticipated hunting effort by non-local hunters.

The Nunatak Bench area of Unit 5A has been closed under State and Federal regulations since 2001 due to low survey numbers. After an initial emergency closure of the Nunatak Bench Area in 2001, because of the continued decline in the population, Alaska Department of Fish and Game (ADF&G) eliminated the Nunatak Bench from the State registration permit (RG170) area in 2002, thereby eliminating the need for repeated emergency closures and assuring a closure until survey data indicates a harvestable population. A proposal by ADF&G to officially define the area commonly known as Nunatak Bench was passed by the Alaska Board of Game in 2004. The Federal subsistence season in the Nunatak Bench portion of Unit 5A was also closed by special action annually starting in 2001.

Proposal WP10-15, adopted by the Board in 2010, closed the Nunatak Bench area of Unit 5A in codified Federal regulations.

In 2010, the Board adopted Proposal WP10-22, which delegated authority to the Yakutat District Ranger to set Federal subsistence harvest quotas; close, reopen or adjust seasons; and adjust harvest and possession limits for moose, deer and mountain goats via delegation of authority letter only. Most recently, in 2018 the Board issued a revised letter of delegation to the Yakutat District Ranger for the management of deer, moose, and mountain goats on Federal lands within the Yakutat Ranger District of the Tongass National Forest (**Appendix I**). The scope of delegation includes establishing quotas, closing, reopening, or adjusting seasons, and adjusting harvest and possession limits. The delegation of authority letter also allows the closing of Federal public lands to the take of these species by all users, and to close and reopen Federal public lands to nonsubsistence hunting, when necessary to conserve deer, moose, and mountain goat populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations.

Due to declining survey numbers, the State mountain goat season in that portion of Unit 5A remainder bounded by the western edge of Harlequin Lake and the Yakutat Glacier on the east, Russell Fjord on the west, and Nunatak Fjord (including the East Nunatak Glacier) on the north (i.e. area west of Harlequin Lake-**Figure 1**), was closed by ADF&G Emergency Order beginning in 2008 and has been closed annually since. The 2018-2019 Federal subsistence season in this same area was partially closed by Wildlife Special Action WSA-12-MG-04-18 during the 2018/19 regulatory year, and the season was closed in its entirety during the 2019/20 (WSA-12-MG-01-19), 2020/21 (WSA-13-MG-03-20), and 2021/22 (WSA-12-MG-02-21) regulatory years.

Proposal WP20-14 was passed by the Board in 2020, revising the customary and traditional use determination for goats in Unit 5 to include rural residents of Units 1-5.



**Figure 1.** Unit 5A mountain goat survey and harvest management areas. Closed area includes Nunatak Bench (permanently closed to harvest under State and Federal regulations), and the submanagement area west of Harlequin Lake to Nunatak Bench.

## Biological Background

### Population trends

ADF&G initiated goat surveys in Unit 5 in 1971. The population declined significantly by 1973; this was a common occurrence throughout southeast Alaska in the early 1970s, primarily attributable to severe winter weather. Aerial survey and anecdotal accounts from guides, pilots, and hunters indicated that goat numbers increased in the 1980s. Although no aerial surveys were conducted in the 1990s, anecdotal information from hunters and guides suggested that goats were abundant throughout Unit 5; however, dramatic declines in goat numbers were observed in the Nunatak Bench area of Unit 5A beginning in the late 1990s (Scott 2014). Aerial survey numbers reported below should be considered a minimum, uncorrected estimate of the true population size.

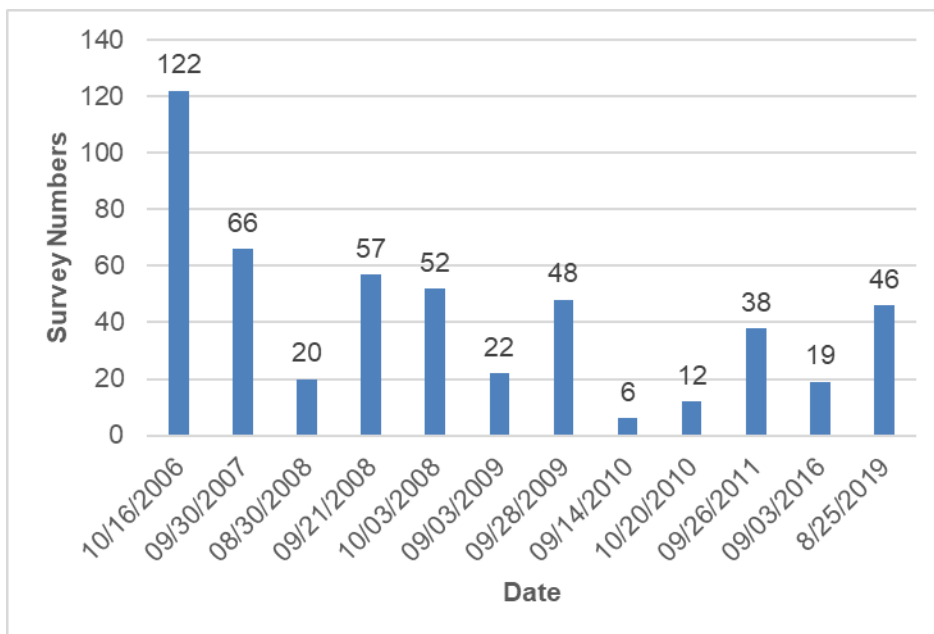
Current State management objectives (Scott 2014) are:

- Maintain goat densities so at least 30 goats per hour are seen during fall surveys
- Use pamphlets, videos, and other educational materials to ensure a male:female harvest of at least 2:1
- Identify discrete geographic areas and manage within these areas
- Maintain a guideline harvest not to exceed 6 points (males=1 point and females=2 points) per 100 goats observed
- Conduct aerial surveys at least every 3 years in areas of high harvest

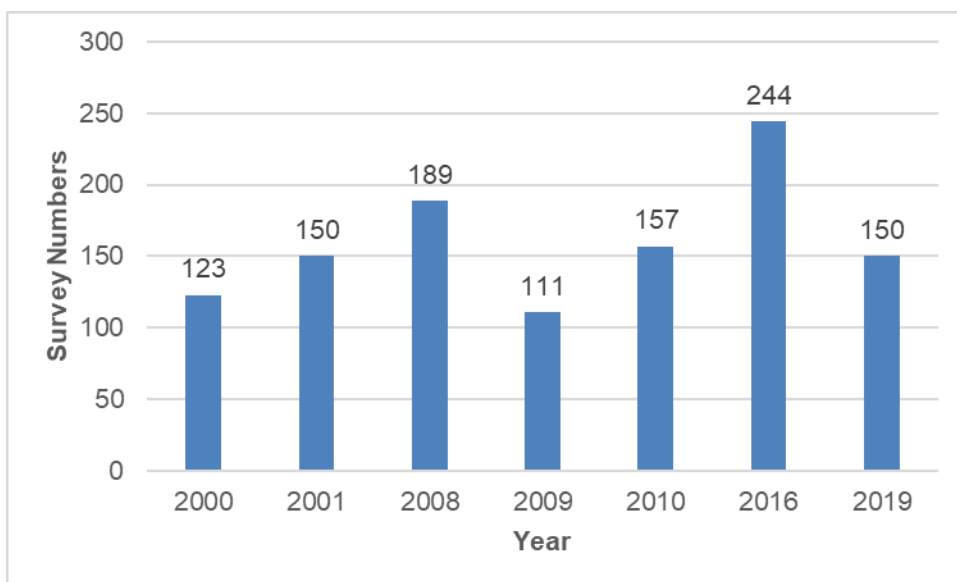
Since 2000, aerial survey data from Unit 5A has been recorded for 3 specific zones: Nunatak Bench, Nunatak Bench to the west side of Harlequin Lake, and the east side of Harlequin Lake to the Alsek River (**Figure 1**). Survey numbers declined in the section from Nunatak Bench to the west side of Harlequin Lake beginning in 2007, ranging from 6-57 total goats observed during surveys from 2008-2019, with the most recent count of 46 goats in 2019 (**Figure 2**). Multiple surveys have been conducted in some years as time and resources allow, including follow-up surveys if initial survey conditions were poor. Low numbers in both 2010 surveys are likely indicative of poor survey conditions. Survey numbers have remained relatively stable from the east side of Harlequin Lake to the Alsek River, averaging a total of 161 goats observed during surveys from 2000-2019 (**Figure 3**).

The Nunatak Bench and area west of Harlequin Lake to Nunatak Fiord are expected to remain closed under State regulations until aerial survey results suggest goat numbers have increased to near 80 on Nunatak Bench and 100 between Harlequin Lake and Nunatak Fiord (Scott 2014).

Of the quantifiable ADF&G management objectives of harvest point levels (guideline harvest not to exceed 6 points per 100 goats observed, males=1 point and females=2 points) and goats per hour observations (maintain goat densities so at least 30 goats per hour are seen during fall surveys), only harvest level guidelines were met during the most recent reporting period (Scott 2014).



**Figure 2.** Total (raw) number of goats observed between Harlequin Lake and Nunatak Fiord by survey date, 2006-19 (Oehlers 2019, Oehlers and Scott 2016, Scott 2014).



**Figure 3.** Total (raw) number of mountain goats observed during aerial surveys conducted from Harlequin Lake to Alsek River, by year, 2000-19 (Oehlers 2019, Oehlers and Scott 2016, Scott 2014).

Diet

Mountain goats eat a variety of forage, and are classified as intermediate browsers. They appear to be a generalist herbivore that eats what is available; therefore, diets vary according to availability (Côte and Festa-Bianchet 2003). In southeast Alaska, conifers (*Tsuga* sp.), lichens (*Lobaria* sp.), mosses, and *Vaccinium* sp. are important components of winter diet (Fox and Smith 1988, White and Barten 2008). Fox et al. (1989) reported that the spring diet of goats in Southeast Alaska includes alder,

rhizomes, and new shoots of the fern *Athyrium filix-femina*. Sedges/rushes, lichens, forbs, and ferns comprised 85% of the summer-fall diet of a southeast Alaska population of goats (White and Barten 2008).

### Habitat

Goats have been reported to winter in coniferous forests at sea level and summer in the mountains (alpine and subalpine areas) in coastal areas of British Columbia and Southeast Alaska (Hebert and Turnbull 1977, Fox 1983, Smith 1984, Robus and Carney 1995). Fox et al. (1989) summarized that goats make use of a variety of habitats during summer in southeast Alaska, including tall grass-herbs, mesic sedge-grass tundra, alpine herbaceous tundra, and substantial use of closed tall shrub, open conifer forest, and wet sedge-grass tundra. In winter, goats in Southeast Alaska predominantly use closed conifer forest, alpine herbaceous tundra, tall grass (bluejoint-herb), and open conifer forest, with lesser use of closed tall shrub and shrub tundra (Fox et al. 1989).

Security from predators, thermoregulation, snow avoidance, and forage availability have all been identified as important considerations in winter habitat selection by goats in Southeast Alaska (Schoen and Kirchhoff 1982) and South-coastal British Columbia (Taylor and Kulus 2006). Smith (1986) reported that over 85% of all winter relocations of radio-collared goats in three Southeast Alaska goat populations occurred in forested habitat, and concluded that use of forested habitats may be critical to over-winter survival and productivity for coastal mountain goats.

There have been no formal studies of habitat quality or trends for mountain goats in Unit 5A. Like many areas in southeast Alaska, the mountain goat habitat carrying capacity in Unit 5 is unknown (Scott 2014). Residual effects of the 2002 Russel Fjord flooding event may continue to negatively impact lower elevation habitat in a portion of Unit 5A (Oehlers and Henniger 2009).

### Reproduction

Mating season generally occurs from late October to early December, although geographic variation exists. The birthing season is usually from mid-May to early June and is generally highly synchronized, but there are usually a few late births from mid-June to early July. Female goats appear to have adopted a very conservative reproductive strategy, generally exhibiting a low reproductive effort, late age at first reproduction (i.e. 4-5 years of age), and favoring strategies to ensure their long-term survival over any one reproductive event (Festa-Bianchet and Côte 2008). Annual kid production varies with age; a range of 40-82% was reported in a Southeast Alaska population, with younger and older females less likely to have a kid at heel than prime-aged (i.e. 7-9 years old) females (White et al. 2012).

### Limiting factors

Management concerns for mountain goats include late age at first reproduction (Festa-Bianchet and Côte 2008, White and Barten 2008), low kid production, and high susceptibility to harvest (Côte and Festa-Bianchet 2003). Toweill et al. (2004) summarized that population recovery following herd reduction is slow due to relatively low productive rates, high mortality, and low dispersal rates and, as a

result, hunting mortality can be additive to natural mortality. The Nunatak Bench area of Unit 5A, for example, remains at a low population level following a decline in the early 2000s, despite continued hunting closures.

Fox et al. (1989) suggested that quantity and quality of forage is likely a major limiting factor for goats in Southeast Alaska. Severe winters have been associated with declines in several mountain goat populations, including southeast Alaska (Smith 1976, Wright 1977, Smith 1984). Klein (1953) reported that heavy snow cover may prevent goats from obtaining sufficient forage, and may restrict movements to the point of starvation. White et al. (2011) reported that, overall, winter climate exerted the strongest effects on mountain goat survival in coastal Alaska; summer climate, however, was also significant and indirectly affected survival during the following winter.

Small populations are susceptible to extinction due to environmental variation, demographic stochasticity, and inbreeding (Caughley and Sinclair 1994 *in* Komers and Curman 2000). Varley (1995) observed limited movements between “island-like” alpine habitats, possibly attributable to lack of habitat between suitable use areas, and that more isolated subunits usually supported lower population densities. Small populations (i.e. < 75-100 animals) may not be able to sustain any harvest (Hamel et al. 2006) and, at a minimum, harvest can be a primary factor (in combination with others factors including predation and weather effects) affecting population growth (Adams 1981, Smith 1988, Voyer et al. 2003). Some populations in Alberta have not recovered after 14 years of closed seasons (Hamel et al. 2006). Currently, the population of mountain goats west of Harlequin Lake (including Nunatak Bench) is below the threshold for sustaining a harvest (Scott 2014), whereas the subpopulation east of Harlequin Lake to Alsek River is capable of sustaining a harvest.

Global climate change has the potential to negatively affect cold adapted alpine species including mountain goats (White et al. 2018). Warmer winters in mountainous areas, as influenced by global climate warming (Diaz and Bradley 1997), have the potential to affect goat populations. Changes in snowmelt and spring green-up are likely to affect the life histories of ungulates (Rutberg 1987, Kudo 1991 *in* Pettorelli et al. 2007). Furthermore, distributions of pathogens may shift northwards with climate warming (Mainguy et al. 2007).

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

Yakutat area Tlingit have a long history of hunting for mountain goats in the Yakutat region. Mountain goat meat, tallow, horns and wool are all traditionally used products (Deur et al. 2015). Mountain goat hunts were traditionally a specialized seasonal harvest involving large numbers of men from the community. Currently, local subsistence users report a generally “opportunistic” pattern of mountain goat hunting, and that mountain goat hunting locations have changed, generally becoming more numerous as the ice has retreated along the coast. Most recently, Sill et al. (2015) reported that in 2015, 5% of Yakutat households used mountain goat. No households reported attempting to or harvesting a mountain goat, but rather received the resource through sharing.



## Harvest History

From 2011-2020, a total of 18 Federal and 100 State permits were issued for mountain goats in Unit 5A remainder (**Table 1**). Of the 100 State permits issued, 22 went to Yakutat residents (Federally qualified subsistence users hunting under State permit); one additional State permit was issued to a Federally qualified subsistence user from outside of Yakutat (includes rural residents of Units 1-5) during the 2020 season. Of 2 goats harvested in 2020 under State regulations, one was by a Yakutat resident. A total of 11 goats were harvested under both State (9) and Federal (2) regulations from 2011-2020 (**Table 2**), averaging 1.1 goats/year. Given the low effort and harvest rate as shown in **Tables 1** and **2**, an annual Federal quota has not been formally announced during this time period; based on the most recent aerial surveys (Oehlers 2019, **Figure 3**), however, and consistent with the State management objectives, a quota of 7 points is currently the guideline for the area open to harvest between Harlequin Lake and Alsek River.

**Table 1.** Mountain goat harvest effort in Unit 5A remainder, from 2011-2020 (Burch 2021). Permits used reflect at least 1 day of hunting reported.

Year	# Federal Permits Issued	# State Permits Issued	# Federal Permits Used	# State Permits Used
2011	1	15	0	0
2012	0	10	0	4
2013	0	9	0	4
2014	3	5	1	2
2015	3	7	1	2
2016	1	3	0	1
2017	1	6	0	0
2018	3	10	2	2
2019	4	17	1	6
2020	2	18	0	5

**Table 2.** Mountain goat harvest in Unit 5A remainder, 2011-2020 (Burch 2021).

Year	Federal Harvest	State Harvest	Total Harvest
2011	0	0	0
2012	0	1	1
2013	0	1	1
2014	0	0	0
2015	0	1	1
2016	0	1	1
2017	0	0	0
2018	1	0	1
2019	1	3	4
2020	0	2 <sup>1</sup>	2

<sup>1</sup> includes 1 Yakutat resident (Federally qualified subsistence user) hunting under a State permit

## Effects of the Proposal

If adopted, this proposal would simplify regulations for both Federally qualified subsistence users and managers by effectively implementing a joint State-Federal quota. This change is not expected to affect Federally qualified subsistence users. Demand has been low by both Federally qualified subsistence users and non-Federally qualified users. Apart from the closed areas due to low population numbers, the low harvest numbers have not warranted early Federal (Special Action) or State (EO) season closures within the recent regulatory history. Federally qualified subsistence users will continue to have an opportunity to harvest goats under Federal or State regulations from Aug. 1-Dec. 31, and in January under Federal subsistence regulations, or until the quota is reached and the season(s) is closed. This change is not expected to affect other uses, since the harvest will still be managed under a quota. If harvest by non-Federally qualified users and/or demand for subsistence harvest increases, the Federal manager has the authority to implement in-season changes, including closing Federal public lands to non-Federally qualified users as needed to ensure that subsistence needs are met. No conservation concern is anticipated since the harvest will still be managed under a quota.

## OSM PRELIMINARY CONCLUSION

**Support** Proposal WP22-11 **with modification** to remove the language describing an announcement of the quota from unit-specific regulations and maintain in the delegation of authority letter only (**Appendix 1**).

The modified regulation should read:

### Unit 5A, remainder—Mountain Goat

*1 goat by Federal registration permit. ~~The harvest quota will be announced prior to the season. A minimum of 4 goats in the harvest quota will be reserved for federally qualified subsistence users.~~ Aug. 1-Jan. 31*

## Justification

The current regulation is cumbersome and difficult for in-season managers to effectively implement. A static number (4) relative to a quota that fluctuates based on the current (most recent available) population data is not an appropriate management directive and does not reflect sound management practices. Effort and harvest are low by both Federally qualified subsistence users and non-Federally qualified users. Subsistence demand has been met without actively reserving animals for harvest. Consequently, this regulation is not necessary and needlessly complicates regulations for both managers and users. The Yakutat District Ranger has the authority and flexibility to manage the harvest and ensure continued subsistence uses of the resource without this regulation. Further, priority for Federally qualified subsistence users is provided by a longer season.

The language referencing the quota announcement is not necessary and is inconsistent with other unit-specific regulations. The Yakutat District Ranger already has the authority to announce harvest quotas via a delegation of authority letter (**Appendix I**). These changes will simplify the regulations for all users and managers.

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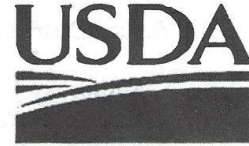
## Appendix 1



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

## Federal Subsistence Board

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



FOREST SERVICE

OCT 26 2018

OSM 180117.CM

Yakutat District Ranger  
Tongass National Forest  
P.O. Box 327  
Yakutat, Alaska 99689

Dear Yakutat District Ranger:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Yakutat District Ranger to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of a wildlife population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within the Yakutat Ranger District of the Tongass National Forest for the management of deer, moose and mountain goats on these lands.

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

### DELEGATION OF AUTHORITY

**1. Delegation:** The Yakutat District Ranger is hereby delegated authority to issue emergency or temporary special actions affecting deer, moose, and mountain goats on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

Yakutat District Ranger

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

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

- You may set Federal subsistence harvest quotas, close, reopen or adjust seasons, and adjust harvest and possession limits for deer, moose, and mountain goats. You may also close Federal public lands to the take of these species by all users.

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

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

The Federal lands subject to this delegated authority are those within the Yakutat Ranger District of the Tongass National Forest.

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

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

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

Yakutat District Ranger

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rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

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

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

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

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

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

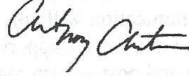


Yakutat District Ranger

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**6. Support Services:** Administrative support for regulatory actions will be provided by the Office of Subsistence Management.

Sincerely,



Anthony Christianson  
Chair

**Enclosures**

**cc: Federal Subsistence Board**

- Assistant Regional Director, Office of Subsistence Management
- Deputy Assistant Regional Director, Office of Subsistence Management
- Subsistence Policy Coordinator, Office of Subsistence Management
- Wildlife Division Supervisor, Office of Subsistence Management
- Subsistence Council Coordinator, Office of Subsistence Management
- Chair, Southeast Alaska Subsistence Regional Advisory Council
- Commissioner, Alaska Department of Fish and Game
- Special Assistant to the Commissioner, Alaska Department of Fish and Game
- Forest Supervisor, Tongass National Forest
- Special Agent in Charge, Law Enforcement and Investigations FS (Region 10)
- Interagency Staff Committee
- Administrative Record

<b>WCR22-01 Executive Summary</b>	
<b>Closure Location and Species</b>	Unit 2, Prince of Wales Island (POW), excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait)—Deer.
<b>Current Regulation</b>	<p><b>Unit 2—Deer</b></p> <p><i>5 deer; however, no more than one may be a female deer. July 24 – Jan. 31</i></p> <p><i>Female deer may be taken only during the period Oct.15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.</i></p> <p><i>Federal public lands on Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 - Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Unless otherwise restricted, non-Federally qualified users may only harvest up to 2 male deer.</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Maintain Status Quo</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	

**WCR22-01 Executive Summary**

<b>Written Public Comments</b>	<b>1 oppose</b>
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**FEDERAL WILDLIFE CLOSURE REVIEW  
WCR22-01**

**Closure location**

Unit 2, Prince of Wales Island (POW), excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait)—Deer.

**Existing Federal Regulation**

**Unit 2—Deer**

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

*July 24 –  
Jan. 31*

*Federal public lands on Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 - Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Unless otherwise restricted, non-Federally qualified users may only harvest up to 2 male deer.*

**Closure Dates:** August 1 – August 15

**Current State Regulation**

**Unit 2—Deer**

*Residents and Nonresidents: Four bucks*

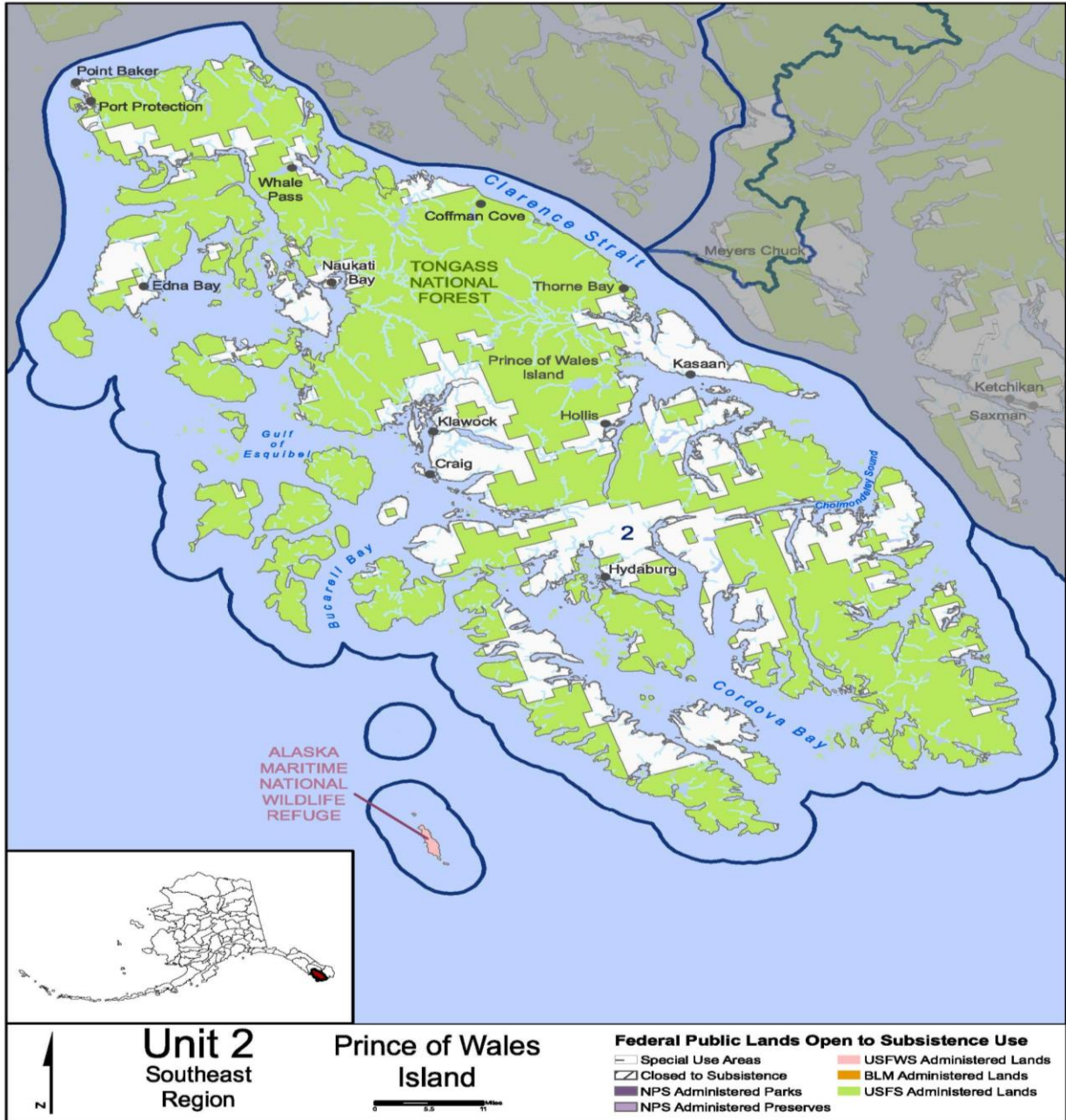
*Aug. 1 – Dec. 31*

*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.*

**Regulatory Year Initiated:** 2003

**Extent of Federal Public Lands/Waters**

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



**Figure 1:** Map of the Unit 2 hunting area in Southeast Alaska, which is comprised of Prince of Wales Island and surrounding smaller islands.

### **Customary and Traditional Use Determinations**

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

### **Regulatory History**

In 2003, the Federal Subsistence Board (Board) adopted Proposal WP03-05, which initially closed Federal public lands for hunting deer Aug. 1- 21. August was chosen to coincide with the earlier start date of July 24<sup>th</sup> with proposal WP03-04 and provide a total of 28 days to hunt for Federally qualified subsistence users. In 2004, the Board adopted Proposal WP04-15 with modification to change the Federal public lands closure from Aug. 1-21 to Aug. 1-15, and to keep the closure in perpetuity. In 2006, the Board adopted Proposal WP06-08 to exclude the southeast portion of Prince of Wales Island from the Federal closure area (**Table 1**). This made the closure more consistent with prior ADF&G recommendations and ensured opportunity for State residents, as well as other hunters.

In August 2020, the Board approved a revised closure policy, which stipulated all closures will be reviewed every four years. The policy also specified that closures, similar to regulatory proposals, would be presented to the Councils for a recommendation and then to the Board for a final decision. Previously, closure reviews were presented to Councils that then decided whether to maintain the closure or to submit a regulatory proposal to modify or eliminate the closure.

Prior to implementation of Federal regulations, opportunity to harvest antlerless deer was available under State regulations from 1955-1972. From 1973-1977, the antlerless harvest limit was reduced. During the 1987 season, the opportunity to harvest one female deer under State regulations was re-implemented. Harvest data for these years are not available. Between 2005 and 2019, reported deer harvests of female deer in Unit 2 ranged from 60 to 119 animals. While the average female deer harvest increased to 107 since 2005. The female deer harvest percentage decreased to 3.2% of the total harvest.

**Table 1:** Regulatory history in Unit 2 related to the closure

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP03-04</b>	2003	Adopted with modification adding one week in July at the front of the season (July 24-31)	Extended early deer season for Federally qualified users
<b>WP03-05</b>	2003	Adopted with modification restricting non-Federally qualified users from Aug 1-21 on Federal Public Lands on Prince of Wales Island (closure for 1 year)	Closed Federal public lands from Aug 1-Sept. 1 and reduced harvest limit to 2 deer for non-Federally qualified subsistence users.
<b>WP04-15</b>	2004	Adopted with modification restricting non-Federally qualified users from Aug 1-15 on Federal Public Lands on Prince of Wales Island	Continued the one year closure passed by the Board during the 2003 regulatory cycle.
<b>WP06-08</b>	2006	Adopted with modification including: 1) removal of the August closure on the SE portion of Prince of Wales Island; 2) rejected closure to non-Federally qualified users on Suemez Island; and 3) rejected a closure to non-Federally qualified users on the islands located along the SW coast of Prince of Wales Island.	Expanded closure area to non-Federally qualified users.
<b>WCR10-01</b>	2010	No action: closure maintained	Closure review
<b>WP16-01</b>	2016	Adopted with modification adding January season, but rejected non-qualified harvest reduction	Restricted non-Federally qualified users two deer and extended season closing date from Dec. 31 to Jan. 31
<b>WP16-05</b>	2016	Adopted	Requested language stating the Unit 2 deer harvest limit may be reduced to four deer in times of conservation be removed
<b>WP18-01</b>	2018	Adopted with modification to accept harvest limit restriction but opposed season reduction.	Limited harvest to two deer from Federal public lands and reduced season by one week or more for non-Federally qualified subsistence users
<b>WP18-02</b>	2018	Adopted	Modified deer C&T for Units 1-5 to all rural residents of Units 1-5.

**Closure Last Reviewed:** 2010 - WCR10-01.

### **Justification for Original Closure (Section 815(3) criteria)**

Federal public lands in Unit 2 were closed to deer hunting in early August to non-Federally qualified users for the continuation of subsistence uses. A number of reasons were discussed as justification for the closure: The long-term trend of declining deer habitat (only 6% of clearcuts remain “hunnable”); size of the deer population in Unit 2; apparent increase in hunter participation; and competition between user groups that resulted in a decline in subsistence opportunity, especially in the most road-accessible portions of Prince of Wales Island, and to coincide with the earlier July 24<sup>th</sup> start date for Federally qualified users

Section §815(3) of ANILCA states:

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

### **Council Recommendation for Original Closure**

The Southeast Alaska Subsistence Regional Council (Council) supported the original proposal (WP03-05) with modification to close Federal public lands to non-Federally qualified users Aug. 1-Aug. 10 instead of Aug. 1- Sept.1. and reduce the limit for non-Federally qualified users from 4 to 2 deer. The Council concluded that there was substantial evidence that the deer population on POW had declined and that this decline was likely to continue as habitat changes persisted.

### **State Recommendation for Original Closure**

Oppose: The Federal board is not authorized to regulate non-Federally qualified subsistence users in the manner requested in this proposal. In November 2002, the Board of Game rejected a proposal to reduce the bag limit for deer in Unit 2 from 4 to 2 bucks, concluding that a reduction in harvest opportunity was not needed at that time. The fact that hunters reported seeing fewer deer may have been a product of thicker second growth in the abundant clearcuts in Unit 2.

### **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation on steep slopes where there is less snow accumulation, and old-growth forests provide snow-intercept and foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet energetic needs of lactating does. Some deer migrate and follow the greening vegetation up to alpine for the summer, while others remain at lower elevations. The breeding season, or rut, occurs late October through late November (ADF&G 2009) peaking around mid-November. Wolves and black bears are the primary predators present in Unit 2 and may reduce deer populations or increase recovery times after severe winters.

### **Recent population indices**

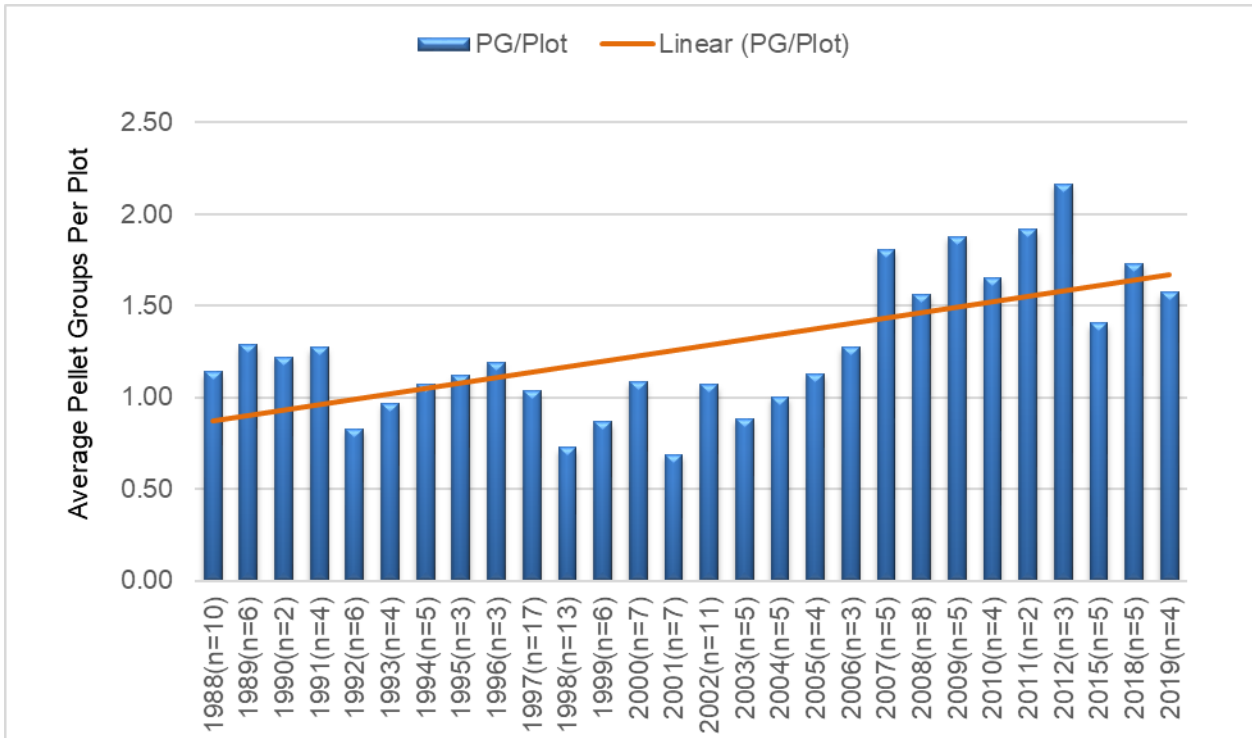
Managing Sitka black-tailed deer and deer hunters is a difficult task in this region. Alaska Department of Fish and Game (ADF&G) relies on indices (aerial surveys and pellet counts) (**Figures 2 and 3**) and harvest statistics to assess population trends. ADF&G management objectives are to: 1) maintain populations with more than 45 deer per mi<sup>2</sup> (17 per km<sup>2</sup>) on winter range, as determined by mean densities of 1.4 pellet groups per plot (Kirchhoff 1990) and, 2) maintain the deer population at 75,000 to allow for a minimum of 2,700 harvested deer per year (Hasbrouck 2020).



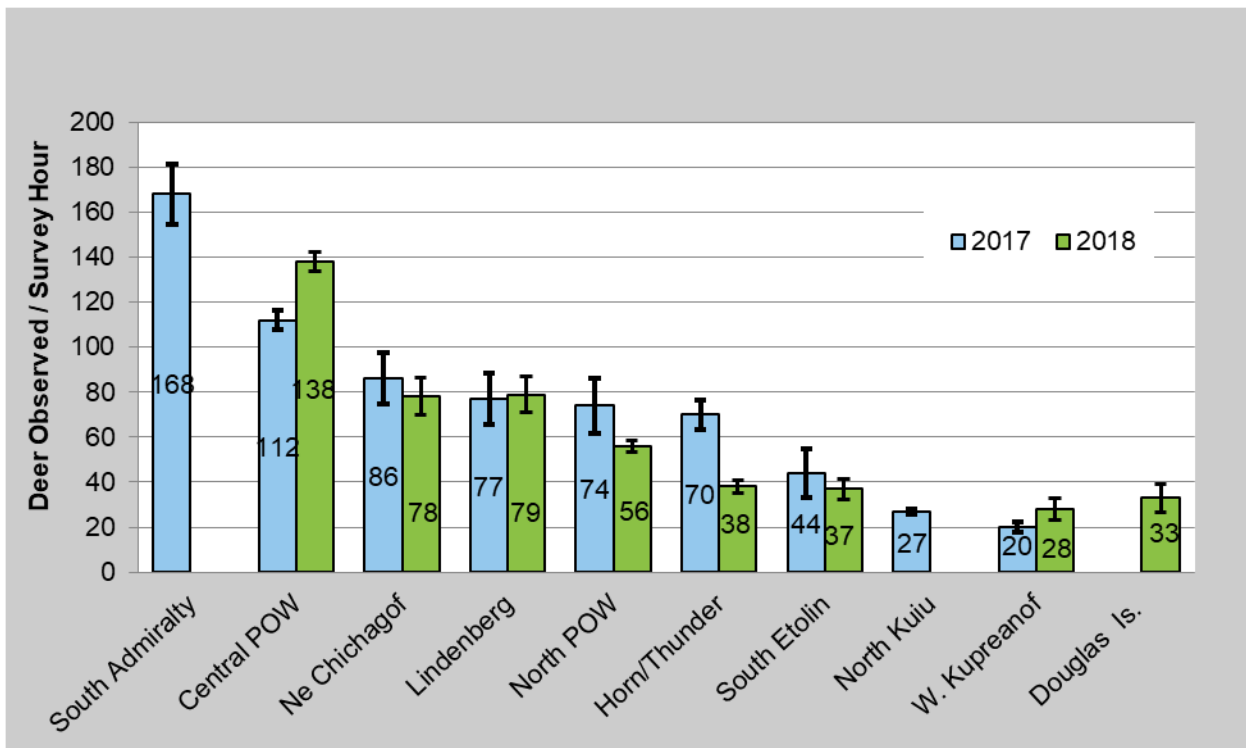
There are no methods to directly count deer in Southeast Alaska, so ADF&G conducts deer pellet surveys as an index to the relative abundance of the deer population. Relating pellet group data to population levels is difficult; however, factors other than changes in deer population size can affect deer pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same zones each year. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer (McCoy 2011).

Pellet group transects were designed to detect large (>30%) changes in abundance and are not a suitable tool for monitoring smaller year-to-year changes. Although pellet-group surveys remain the only widely available tool to estimate deer population size, the results should be interpreted with caution. Pellet-group data in Unit 2 suggests an increasing population trend since a low during the late 1990s and early 2000s (**Figure 2**). Recent indices and harvest statistics suggest the deer population is currently stable. Both pellet count data of 1.4 and deer harvest data have exceeded minimum objectives since 2008 (Hasbrouck 2020).

ADF&G began testing alpine aerial survey techniques for deer in 2013 (**Figure 3**); 2017 was the first year with an established aerial survey protocol and consistent surveys across southeast Alaska. ADF&G is still researching the correlation between alpine summer surveys and actual deer populations. Surveys were not done in 2019 and 2020. Aerial survey numbers seem to reflect the relative abundances expected among various locations, but correlations with population trends remain unknown at this time.



**Figure 2:** Annual average pellet group counts and general trend for deer in Unit 2 through 2019 (McCoy 2019a).



**Figure 3:** Aerial alpine surveys across southeast Alaska for 2017 and 2018 (McCoy 2019b). Central POW and North POW are the areas surveyed in GMU 2.

### Other Mortality

Historically, prior to extensive road paving on the island, deer/vehicle collisions were rare (10–25 deer/year) and not considered a significant source of mortality. However, the collision risk increased in 2003 with completion of extensive new POW highway paving projects, which now extend from Craig to Coffman Cove and east to Thorne Bay. Construction and paving of the main roads to Coffman Cove and Whale Pass were completed. Higher vehicle speeds, as well as an attractive food source created by planting grass for erosion control near the roads has likely caused more deer/vehicle collisions, prompting managers to raise estimates of collision mortality to 30-50 deer per year, beginning in 2004.

Another source of mortality may be illegal and unreported harvesting. Anecdotal reports, interviews with law enforcement personnel, and fates of radio-collared deer suggest that over 4% of the estimated 75,000 deer in Unit 2 may be illegally harvested each year. Unreported and illegal harvest in Unit 2 is equal to that of the legal harvest and is one of the highest in the region (Table 5). Actual mortality from legal hunting could be 38% greater than the estimated harvest because of unknown or unreported crippling loss (Bethune 2015). Field observations and voluntary reports of wounding loss suggest that this estimate might be conservative (Flynn 1989). High illegal take is likely due in large part to the extensive and remote road system, and few law enforcement personnel patrolling the units.

### Habitat

POW Island has the highest amount of old growth forest in Southeast Alaska (USDA 2016). Since 1954, POW received the most logging activity in the region, which resulted in a 94% reduction of contiguous high-volume forest for lumber production (Albert and Schoen 2013). Logging activity has reduced deer habitat in north central POW by 46% and in south POW by 18% (USDA 2016).

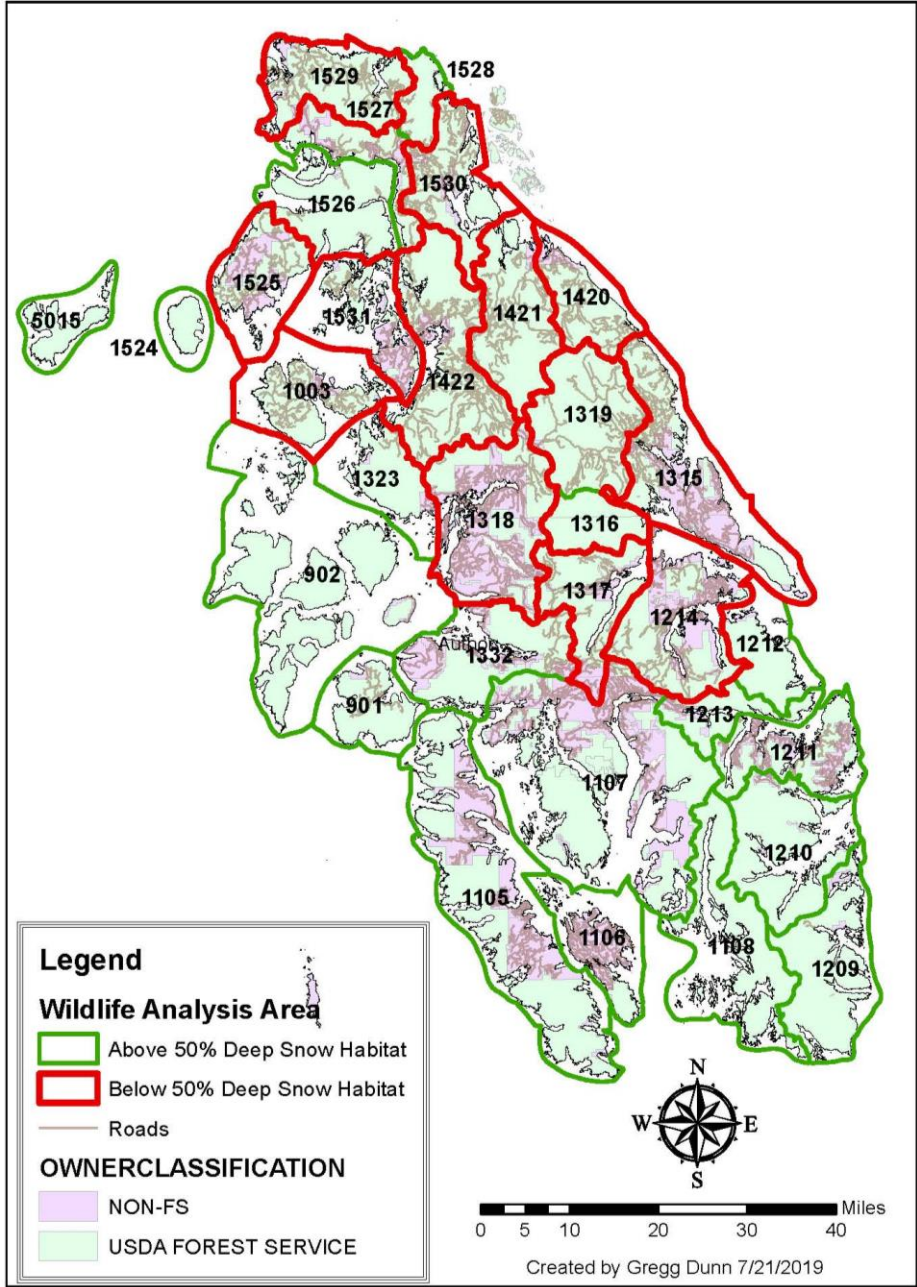
Old-growth forests are considered primary deer winter range in Southeast Alaska because the complex canopy cover allows sufficient sunlight through for forage plants to grow; it also intercepts snow making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Habitat in some areas of Unit 2 have been affected by large scale timber harvest, while habitat remains largely intact in other areas. Young-growth forest treatments (e.g., thinning, small gap creation, branch pruning) can benefit deer forage development in previously harvested stands. Regardless, areas with substantial timber harvest are expected to have lower long-term carrying capacity compared to pre-harvest conditions.

Approximately 62% of the deer winter habitat remains in Unit 2 (**Table 2**) within Wildlife Analysis Areas (WAAs). Deer winter habitat is defined as high volume, old growth forest on south facing slopes below 800 feet in elevation. Many WAAs have less than 50% of the winter habitat remaining (**Figure 4**) because of past timber harvest and road building. When severe winter weather occurs, deer mortality is greatest in these WAAs because there is less habitat available to sustain them. Habitat conditions are not likely to improve in logged areas because stem exclusion can last from 25 years post-harvest to 150 years post-harvest. **Figure 4** displays where the least amount of habitat remains. **Table 2** compares where the greatest timber harvest has occurred compared to available deer winter habitat. Deer wintering areas in WAAs with less than 50% deep snow have the highest deer harvest rates.

Habitat conditions in Unit 2 over the last few years have remained stable because of mild winters and later snow arrival, allowing the deer to forage longer at higher altitudes and in areas such as muskegs. Prolonged snowpack during a severe winter, or during late winters, can have a greater effect on deer survival since less habitat is available for foraging.

**Table 2:** Percent of historical deep snow winter habitat (High Productive Old Growth below 800 feet on south facing slopes) remaining by WAA in GMU 2 since 1954 (the beginning of large scale logging), percent productive old growth remaining, average harvest since 2005, and harvest trend.

WAA	Remaining Productive Old Growth since 1954(%)	Remaining Deep Snow Deer Winter Habitat (%)	Average Reported Harvest (%) by WAA since 2005 and trend
901	89	85	69 ↑
902	100	100	79 ↓
1003	51	49	46 ↑
1105	99	99	84 ↑
1106	100	100	25 ↓
1107	97	93	138 ↑
1108	99	99	17 ↑
1209	100	100	10 ↑
1210	99	99	50 ↑
1211	83	78	36 ↑
1213	99	99	21 ↑
1214	67	48	245 ↑
1315	55	29	350 ↑
1316	99	100	27 ↓
1317	56	23	145 ↑
1318	78	49	220 ↑
1319	74	61	229 ↓
1323	90	76	18 ↓
1332	80	72	76 →
1420	54	27	308 ↑
1421	71	44	107 ↓
1422	51	29	386 ↓
1525	51	40	21 ↑
1526	93	83	18 ↑
1527	67	61	23 ↓
1528	82	84	37 →
1529	55	46	144 ↓
1530	50	37	145 ↑
1531	55	49	37 ↓



**Figure 4:** Map of Unit 2 showing deep snow deer winter habitat and where habitat availability is below 50% in WAAs. Note: WAA 5015 is not part of Unit 2.

**Cultural Knowledge and Traditional Practices**

A cultural research project conducted between August 2014 and February 2015 showed that weather patterns changed during the lifetimes of participants interviewed from 11 different communities (three in Unit 2) in Southeast Alaska. There were three main questions asked and opinions differed on the intensity and duration of changes; specifically, timing of seasons, and extent of differences observed (Wyllie de Echeverria 2019). Research participants observing ‘seasonal shifts’ referred specifically to

weather typically considered autumnal such as major rainstorms occurring earlier in the year. Season length was seen to shift, becoming sometimes shorter or longer (Wyllie de Echeverria 2019). Snow no longer lasts throughout the winter and water does not freeze in this region. The authors of this study did not postulate how weather changes affected resource distribution, harvesting, and processing, however.

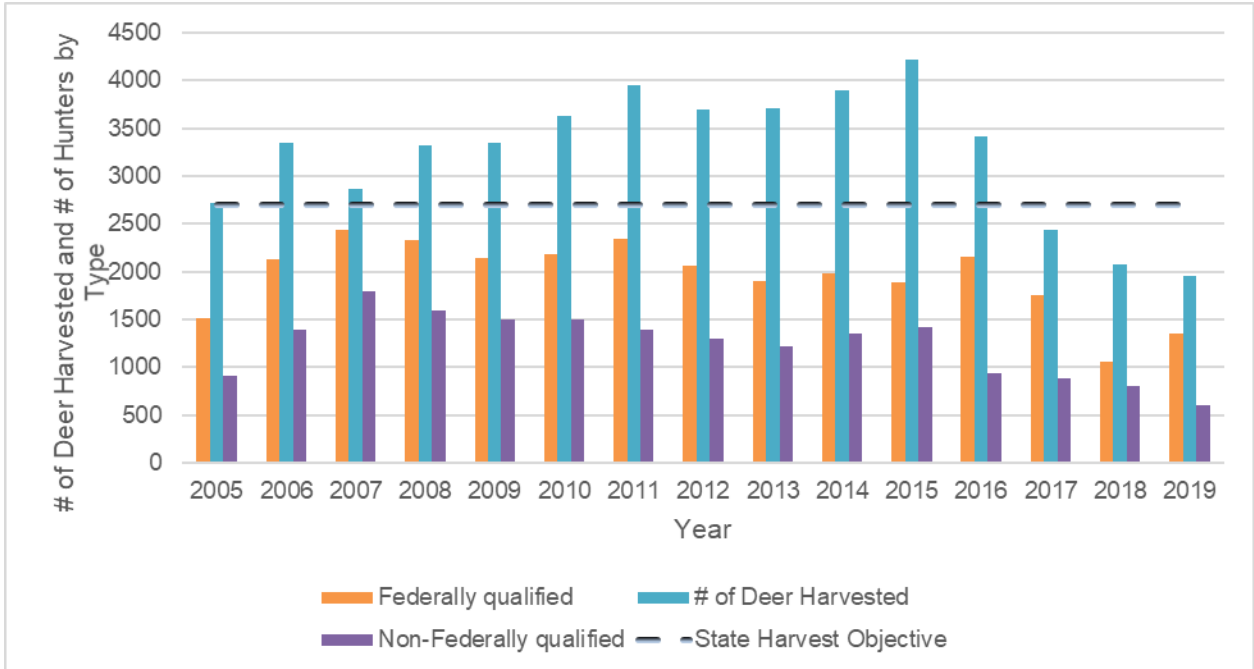
### **Harvest History**

ADF&G harvest data obtained from several reporting systems, including the Region 1 (Southeast Alaska) deer survey, Unit 2 deer harvest report, and the State-wide deer harvest report (McCoy 2019b). The Region 1 deer survey is the most consistent report, covering the years 1997–2010, and is based on a sample of hunters. In general, 35% of hunters from each community were sampled annually and, while response rates varied by community, the overall response rate across communities was approximately 60% each year.

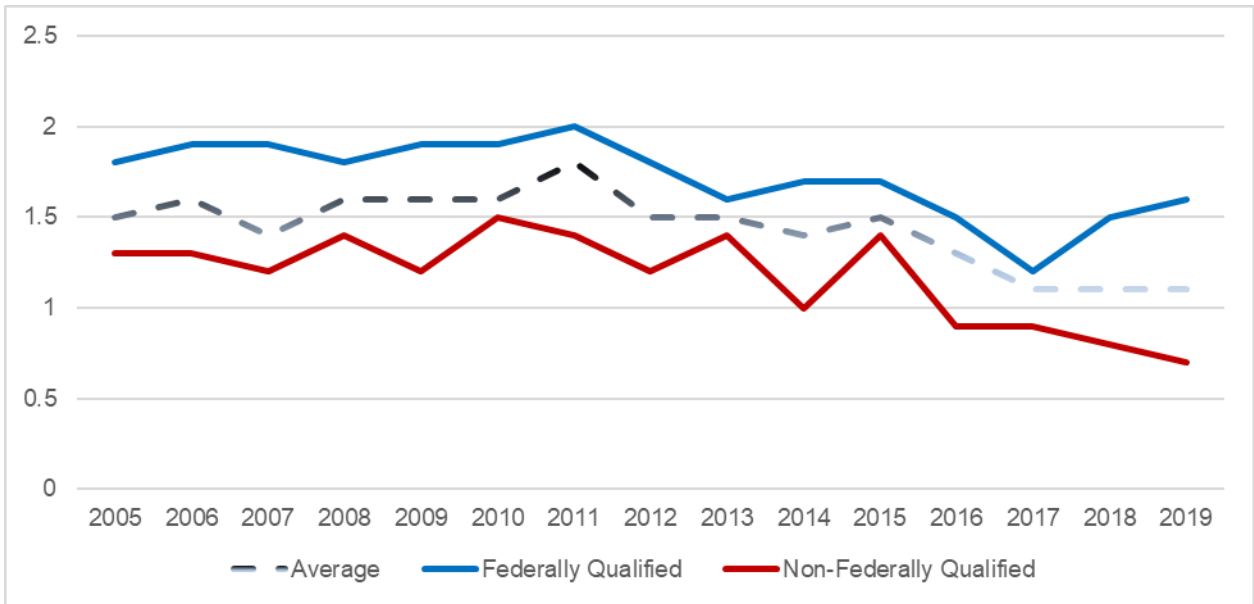
Alaska Board of Game, in fall 2000 established a harvest objective of 2,700 deer for Unit 2 and a population goal of 75,000 deer and considered the population as important for satisfying high levels of human consumptive use (Bethune 2013). The estimated average total annual harvest was 3,467 deer in Unit 2 from 2005-2018 (**Figure 5**). Harvests were at or above the Unit 2 harvest objective from 2005-2016 but fell below harvest objectives during the 2017-2019 seasons. Deer harvest reached historically high levels in 2015 and then began to decline. There is a similar pattern seen with hunter participation in the Unit 2 deer hunt (**Figure 5**).

Federally qualified subsistence users harvest the most deer in Unit 2 and accounted for 59-71% of the total harvest from 2005-2018 (**Figure 5**). This estimate may be significantly higher, as past testimony taken at Regional Advisory Council meetings suggested that some communities do not fully report (SERAC 2015; SERAC 2017). Between 2005 and 2015, the number of deer harvested per hunter by non-Federally qualified users averaged 1.5, and the number harvested by Federally qualified users averaged 1.8 (**Figure 6**).

Federally qualified subsistence users in Unit 2 had a higher success rate than other hunters from 1997-2017 with an average success rate of 74.4% compared to 59.6% success rate for non-Federally qualified hunters (**Table 3**). The harvest of five deer under Federal regulations has been allowed since 2006.



**Figure 5:** Estimated total deer harvest and number of hunters by user type from 2005-2019 in Unit 2 (McCoy 2019b)



**Figure 6:** Average Number of deer harvested per hunter by user type in Unit 2, 2005-2019 (McCoy 2019b)

**Table 3:** Number of deer and percent reported harvested by hunter type and overall percent success from 1997-2017 (McCoy 2019b). Note: Non-federally qualified hunters harvest up to four deer (two on Federal lands).

Hunter Type	No Deer	1-2 Deer	3-4 Deer	5 Deer	Overall Success
Federally Qualified	25.6%	48.7%	23.8%	1.8%	74.4%
Non-Federally Qualified	40.4%	46.4%	13.1%	0	59.6%

Much of the harvest in Unit 2 takes place during three time periods: late July/August, October, and November. This is when competition is greatest between user groups. July/August is the opening of the hunt in Unit 2 and people are in alpine areas looking for mature bucks. November is the most popular month to hunt because it coincides with the rut.

**Table 4:** Percent of harvest by month from 2004-2018 (McCoy 2019b). Notes: The January season has only occurred since 2016.

Hunt Month	July/August	September	October	November	December	January
Percent of Harvest	19%	9%	16%	48%	5%	3%

### Weather Patterns

Sitka black-tailed deer adjust their seasonal migrations and habitat use to reflect changing weather patterns. The abiotic factor most closely tied to their movement and distribution is snow. Because air temperatures overall are warming, smaller amounts of snow cover may help migrations to higher elevations, which may make deer less accessible to hunters.

### **Other Alternatives Considered**

One alternative considered was modifying the closure to the first two weeks of November as that would have a greater benefit to subsistence users. Most of the harvest from Federally and non-Federally qualified users occurs during the month of November because of the rut.

### **Effects**

Rescinding the closure would increase opportunities on Federal public lands for non-Federally qualified users during August. This could increase both the number of non-Federally qualified user days and encounters between Federally qualified subsistence users and non-Federally qualified users. This could potentially decrease harvest opportunity for Federally qualified subsistence users through increased competition.

Current Federal regulations allow for a 5 ½ -month season, which may or may not be sufficient to meet subsistence needs. **Table 4** shows that 19% of the harvest occurs in late July/August (McCoy 2019b).



Historical hunting areas and clearcuts are no longer huntable or not easily accessible. Thus, habitat loss from commercial logging appears to affect the ability of Federally qualified subsistence users to find enough deer to meet their subsistence needs.

Local weather patterns are also changing deer habitat use patterns. For example, snow is not driving deer down to traditional locations that subsistence hunters typically use making it harder to find deer.

There is a possibility of increased crowding from and competition with non-Federally qualified users, which may partly be a result of the Access Travel Management Plan (ATM) enacted by the USDA Forest Service in 2009. Specifically, the ATM reduced access to many miles of roads in Unit 2, concentrating hunters into smaller areas.

## **PRELIMINARY OSM CONCLUSION**

**maintain status quo**  
 **modify or eliminate the closure**

### **Justification**

The long-term trend of declining deer habitat, decreasing deer population size, and increase in hunter participation and competition between user groups in the most road-accessible portions of the Prince of Wales Island have affected the perception of increased competition between Federally qualified users and non-Federally qualified users. The harvest objective has not been met since 2017 and the number of deer harvested per user has dropped as well. Finding deer in traditional hunting areas has decreased because of weather, competition, stem exclusion, predation, and road access. This shows there may be less deer on the landscape and supports maintaining the closure.

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## WRITTEN PUBLIC COMMENTS



**unapologetically FOR ALASKAN RESIDENTS**

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July 19, 2021

To: Federal Subsistence Board  
Office of Subsistence Management  
(Attn: Theo Matuskowitz)  
1011 E. Tudor Road, MS-121  
Anchorage, Alaska 99503-6199

Re: Federal Subsistence Board 2022-2024 Wildlife Proposals and Existing Closures

Dear Federal Subsistence Board Members,

Resident Hunters of Alaska (RHAK) represents several thousand members from across the state, rural and urban, who advocate for sustainable wildlife management policies and a resident hunting priority according to Article 8 of our state constitution.

RHAK participates in Regional Advisory Council (RAC) meetings and Federal Subsistence Board (FSB) meetings, and we have become alarmed at the continuing wildlife proposals and special action requests that are not based on actual biological emergencies or conditions that would prevent federally qualified subsistence users (FQU) from meeting their subsistence needs.

What makes any FSB closures and restrictions especially problematic is that there is no differentiation in the federal system between Alaska residents and nonresidents from another state or country; both Alaska residents and nonresidents are deemed the same under federal regulations by definition of a who is a FQU. A prime example of why this is so problematic is that often complaints about competition from non-local non-federally qualified subsistence users (NFQU) center on the nonresident component, which can often comprise the majority of NFQ hunters participating in these hunts. So, when any restrictions or closures on federal lands happen, Alaskans who used to live in a designated rural area but for whatever reason have moved to more urban areas of the state, can't return home to hunt and carry on their traditional hunting activities on federal lands, nor can other Alaskans participate in these hunts.

It has always been RHAK's position that when and where we have wildlife conservation concerns or subsistence opportunities are not being met, that the ***nonresident component should always be the first group of hunters***

Page 1 of 3

*Resident Hunters of Alaska Comments  
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures*

**restricted.** If other restrictions are still necessary, only then can we support restrictions on resident hunters.

We have always advised RACs to first use the Board of Game (BOG) process when and where there are concerns with too much competition from non-local NFQ hunters, as the BOG can differentiate between Alaska residents and nonresidents.

### **Comments on Individual Proposals and Existing Closures**

**WP22-07** Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.

#### **OPPOSE**

The rationale of WP22-07 is not based on any biological data or harvest statistics that show a conservation concern for the deer population on Admiralty Island or that subsistence needs are not being met.

According to Alaska Department of Fish & Game (ADF&G) data, over the last decade we have had mild winters in Game Management Unit 4 and the deer population is *“high and stable.”* The deer population on western Admiralty Island is **not** depleted, as the proposal states. Nor are there any conservation concerns for the deer population under the current hunting regulations.

The proposal also states that there has been increased *“hunting pressure”* from NFQ hunters and it has *“become more challenging for subsistence hunters in Angoon to harvest sufficient deer for their needs.”* But according to ADF&G data, over the last two decades there has been a **decrease** in both the number of FQU and NFQU.

The FSB operates under ANILCA guidelines and the federal code of regulations that govern when and why any closures to NFQU can happen: *“With respect to subsistence uses of a particular fish or wildlife population, the Board may only approve a proposed closure if necessary for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA §816(b), 36 CFR 242.10(d)(4)(vii) and 50 CFR 100.10(d)(4)(vii)).* **Meanwhile, the Board may approve a proposed closure of nonsubsistence uses of a particular fish or wildlife population for any of these same reasons, or if necessary for the conservation of healthy populations of fish and wildlife,**

**or to continue subsistence uses of such population (ANILCA §815(3), 36 CFR 242.10(d)(4)(vi) and 50 CFR 100.10(d)(4)(vi)).”<sup>1</sup>**

The Board should vote down this proposal based on the above guidelines of when any restrictions or closures on federal lands for NFQU are allowed to happen.

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**WP22-09** Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.

**OPPOSE**

Refer to our comments on WP22-07

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**WCR22-01 Deer** Prince of Wales closed Aug. 1-15, except by Federally qualified subsistence users; non- Federally qualified users may only harvest 2 bucks

**Rescind closure to NFQU on Price of Wales Island**

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**WCR22-45 Caribou** Unit 23 - Portions of Unit 23 - closed to non- Federally qualified users

**Rescind closure to NFQU in those portions of Unit 23**

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Thank you for the opportunity to comment.

Sincerely,

Mark Richards  
Executive Director Resident Hunters of Alaska

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<sup>1</sup> <https://www.doi.gov/sites/doi.gov/files/uploads/closure-policy-revised-2020-08-04.pdf>

<b>WCR22-02 Executive Summary</b>	
<b>Closure Location and Species</b>	Unit 5A – Moose
<b>Current Regulation</b>	<p><b>Unit 5A—Moose</b></p> <p><i>Unit 5A, except Nunatak Bench, west of the Dangerous River—1 bull by joint State/Federal registration permit only. From Oct. 8-Oct. 21, Federal public lands will be closed to taking of moose, except by residents of Unit 5A.</i> <span style="float: right;"><i>Oct. 8– Nov. 15</i></span></p> <p><i>Unit 5A, except Nunatak Bench, east of the Dangerous River—1 bull by joint State/Federal registration permit only. From Sept. 16-Sept. 30, Federal public lands will be closed to taking of moose, except by residents of Unit 5A.</i> <span style="float: right;"><i>Sept. 16– Nov. 15</i></span></p>
<b>OSM Preliminary Conclusion</b>	<b>Maintain status quo</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

**Federal Wildlife Closure Review  
WCR22-02**

**Closure Location:** Unit 5A-Moose

**Current Federal Regulation**

**Unit 5A—Moose**

*Unit 5A, except Nunatak Bench, west of the Dangerous River—1 bull by joint State/Federal registration permit only. From Oct. 8-Oct. 21, Federal public lands will be closed to taking of moose, except by residents of Unit 5A.* Oct. 8–Nov. 15

**Closure Dates:** October 8– 21

*Unit 5A, except Nunatak Bench, east of the Dangerous River—1 bull by joint State/Federal registration permit only. From Sept. 16-Sept. 30, Federal public lands will be closed to taking of moose, except by residents of Unit 5A.* Sept. 16–Nov. 15

**Closure Dates:** September 16-30

**Current State Regulations:**

**Unit 5A – Moose**

*Unit 5A west of Dangerous River and Harlequin Lake, and southwest of Russell And Nunatak fiords and the East Nunatak Glacier - One bull by permit, available online, in person in Douglas and Yakutat beginning Aug 15* RM061 Oct. 15-Nov. 15

*Unit 5A east of Dangerous River and Harlequin Lake - One bull by permit, available online, in person in Douglas and Yakutat beginning Aug 15* RM061 Oct. 1-Nov. 15

**Regulatory Year Initiated:** 1991

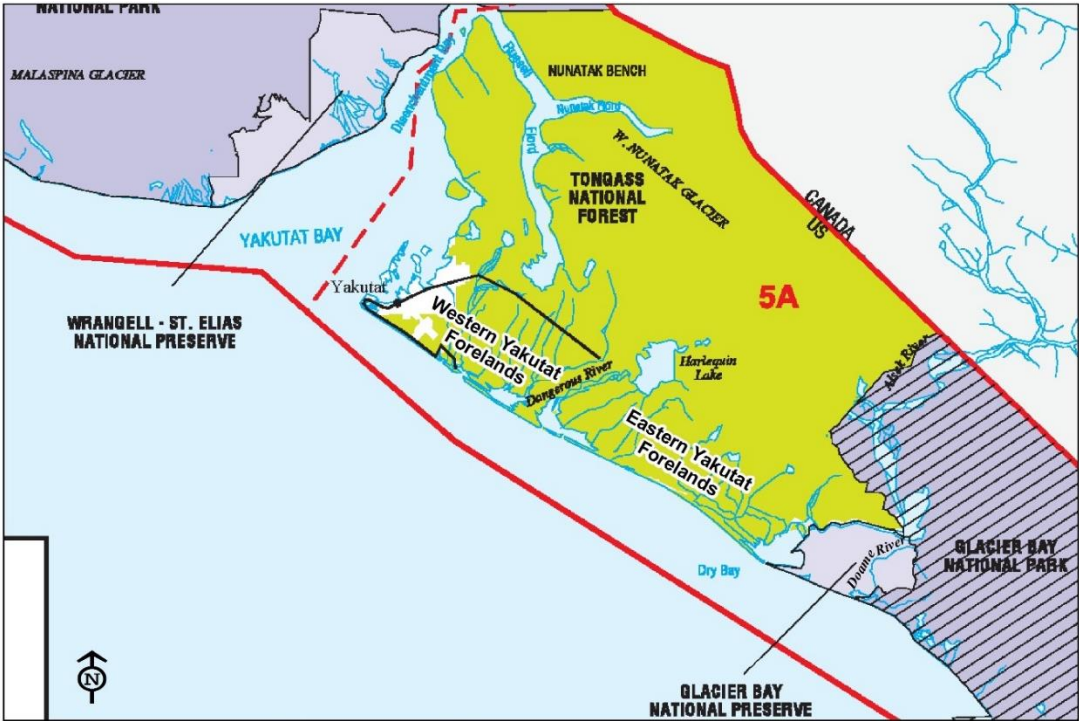
**Extent of Federal Public Lands/Waters**

Federal public lands comprise approximately 98% of Unit 5A and consist of 31% National Park Service (NPS) managed lands and 67% U.S. Forest Service (USFS) managed lands (see **Unit 5 Map**). The area east of the Dangerous River is comprised almost entirely of Federal public lands, with the exception of two Native allotments and a Sealaska Corporation site, all near Cannery Creek west of the Alsek River.



**Regulatory History**

Moose hunting in Unit 5A, except Nunatak Bench has been managed using a registration permit system since 1978. In 1990, the Federal government began managing subsistence hunting, fishing, and trapping on Alaska’s Federal public lands. In 1990, the Federal Subsistence Board (Board) approved Special Action S90-25, which closed Federal lands in Unit 5A to moose hunting from Oct. 15–21, except for Yakutat residents. The Federal Register notice states that the action was taken to “assure a preferential subsistence opportunity of rural Alaska residents with a Customary and Traditional Use determination (C&T). Additionally, the harvest quota for Unit 5A, except Nunatak Bench was set at a total of 60 bulls, with no more than 30 bulls to be taken west of the Dangerous River (Western Yakutat Forelands, 5A West– **Figure 1**).



**Figure 1.** Unit 5A including Western Forelands (5A West) and Eastern Forelands (5A East) harvest and population survey areas on either side of the Dangerous River.

In 1992, the list of communities with a C&T was expanded to include all the residents of Unit 5 and not just the residents of Yakutat (P92-012A). The Board used an emergency special action (S92-10) to close the moose season in Unit 5A West in 1992 because the harvest quota had been reached. In 1994, the Board adopted proposal P94-17 for Unit 5A, which allowed a community-based harvest of 10 additional moose for community potlaches and ceremonial uses from Aug. 1 to Dec. 31.

In 1996, to allow for increased opportunity by Federally qualified subsistence users, the Board adopted proposal P96-014, which extended the Federal season by one week, from Oct. 15 to Oct. 8.

In 2000, the dates for the closure of Federal public lands to non-Federally qualified subsistence users in Unit 5A were changed from Oct. 15 – Oct. 21 to October 8 – October 21 (P00-010), to reflect the change in the Federal moose season start date of October 8.

In 2004, the Board adopted proposal WP04-20, which established a joint State/Federal registration permit for subsistence hunting of moose in Unit 5A (RM061) that allowed for more efficient management and harvest monitoring of the hunt. The State issued Emergency Orders in 2004 (01-02-04) and 2007 (01-08-07) to close Unit 5A West when the number of moose harvested reached 28 to prevent the harvest from exceeding the quota of 30 bulls.

In October 2008, the State issued an Emergency Order (01-07-08) closing Unit 5A West when the harvest reached 20 bull moose. Also in 2008, in response to continued low bull:cow ratios in Unit 5A and to align with the State action, the Board adopted Special Action WSA08-05, which reduced the total harvest quota from 60 to 50 bulls for Unit 5A, except the Nunatak Bench and from 30 to 20 bulls for Unit 5A West. The Federal subsistence priority was maintained through the early season authorized for Federally qualified subsistence users and the closure period. In 2009, the State raised the harvest quota from 50 to 55 bull moose in Unit 5A, except the Nunatak Bench, and from 20 to 25 bull moose in Unit 5A West. This change was based on surveys conducted during the winter of 2008, which indicated improved bull:cow ratios.

In 2009, the Board set the harvest quota for moose in Unit 5A, except the Nunatak Bench at 55 bulls and for Unit 5A West at 25 bulls. In 2010, the Board adopted Special Action WSA09-04, which delegated the U.S. Forest Service Yakutat District Ranger temporary authority to establish a quota and close the moose season for Unit 5A. In 2010, the Board adopted proposal WP10-22, which delegated authority to the Yakutat District Ranger to set Federal subsistence harvest quotas, close, reopen or adjust seasons, and adjust harvest and possession limits for moose (as well as deer and mountain goats) via delegation of authority letter.

From 2010-2016, the Yakutat District Ranger, via delegated authority, and ADF&G established the moose harvest quota in the fall for Unit 5A, except the Nunatak Bench at 55 bulls, with no more than 25 bulls to be taken in Unit 5A West from October 8 to November 15.

In 2017, in response to the recent survey findings including an increased bull:cow ratio observed in 2016, the Yakutat District Ranger, via delegated authority, and ADF&G established the moose harvest quota in the fall for Unit 5A except the Nunatak Bench at 60 bulls, with no more than 30 bulls to be taken in 5A West. From 2018-2020, the Yakutat District Ranger, via delegated authority, and ADF&G established the moose harvest quota in the fall for Unit 5A except the Nunatak Bench at 30 bulls west of the Dangerous River (5A West) and 30 bulls east of the Dangerous River (5A East).

Since 2012, Unit 5A West has been closed by Federal Special Action (WSAs: 13-MO-07-12; 13-MO-12-13; 12-MO-06-14; 12-MO-05-15; 13-MO-05-1; 13-MO-05-17; 12-MO-03-18; 12-MO-03-19; and 12-MO-04-20) and State Emergency Order (EOs: 01-07-12' 01-10-13' 01-11-14' 01-14-15' 01-15-16' 01-14-17' 01-17-18' 01-16-19' and 01-19-20') annually before the season end date of November 15 in order to not exceed the joint quota. From 2014-18, and again in 2020, there was no State season in Unit 5A West since the quota was met prior to the State season opening date. In 2019, the Federal and State seasons in Unit 5A West were closed on October 19. In 2020, Unit 5A East was also closed by Special Action (WSA 12-MO-05-20) and Emergency Order (01-21-20) effective October 28.

In 2012, Federal public lands remained closed to hunting moose from Oct. 8 – Oct. 21 (WCR12-02), except for residents of Unit 5A. The moose population was below the recommended State management goals for the population and the minimum bull:cow ratio. This closure was reviewed again most recently in 2015 (WCR15-02), and the continued closure was supported by the Southeast Alaska Regional Advisory Council (Council) during their winter 2017 meeting.

In 2012, Sealaska Corporation lands near Yakutat (known as “the nine townships”) reverted from State to Federal land management as final land selections were made under the Alaska Native Claims Settlement Act, increasing the amount of Federal public land available for Unit 5A (Yakutat) residents to hunt between Oct. 8 and Oct. 21. Consequently, in Unit 5A West, minimal land is available for non-Federally qualified users to hunt until Federal lands open under State regulations on October 22nd. This land status change also effectively opened up popular hunting areas closer to town for local residents (Federally qualified subsistence users) a week earlier, helping to distribute hunting pressure during the Federal season. However, likely in addition to perceived moose population increases since the previously mild winters, it has also significantly reduced the season length in Unit 5A West since the quota is quickly reached.

In response to the rapid harvest and exceeding the quota in 2014, managers reduced the reporting period for the joint State and Federal moose registration permit for RM061 (Unit 5A, except Nunatak Bench) from 5 days to 3 days, effective in the 2015 season. In the 2018 season, managers reduced the reporting period for the joint State and Federal moose registration permit for RM061 to 24 hours for Unit 5A West.

In 2015, the Council submitted Proposal WP16-06, requesting that a definition of “Nunatak Bench” be added to the Federal subsistence regulations for Unit 5. The Board supported the proposal and the definition of Nunatak Bench was added to the 2016-2018 Federal Subsistence Regulations. The definition is as follows: “In Unit 5A, Nunatak Bench is defined as that area east of the Hubbard Glacier, north of Nunatak Fiord, and north and east of the East Nunatak Glacier to the Canadian Border.”

In 2017, the Yakutat Fish and Game Advisory Committee (Yakutat AC) submitted Proposal WP18-10, requesting that the Federal season for moose in Unit 5A East open from Sept. 1 – Nov. 15, with Federal public lands closed to the harvest of moose except by residents of Unit 5A from

Sept. 1 – Sept. 14 rather than Oct. 8-21. During the 2018 April (10-13) meeting, the Board passed this proposal with modification, based on the recommendation of the Council, to season dates of Sept. 16-Nov. 15 for 5A East, with Federal public lands closed to the harvest of moose except by residents of Unit 5A from Sept. 16 – 30, effective in the 2018 season (2018/2019 regulatory year). In 2018, the Yakutat AC submitted a parallel proposal to the Alaska Board of Game (BOG) (proposal #25), requesting that the State season in Unit 5A East be open Sept. 16-Nov. 15, with Federal public lands closed to harvest of moose except by residents of Unit 5A from Sept. 16-30. The BOG adopted Proposal 25 during their January (11-15) 2019 meeting, with modification to align with the Board action on Proposal WP18-10, to the current State season of Oct. 1-Nov. 15 in Unit 5A East.

In 2018, the Board issued a delegation of authority letter to the Yakutat District Ranger for the management of deer, moose, and mountain goats on Federal lands within the Yakutat Ranger District of the Tongass National Forest. The scope of delegation includes establishing quotas, closing, reopening, or adjusting seasons, and adjusting harvest and possession limits. The delegation of authority also allows the closing of Federal public lands to the take of these species by all users, and to close and reopen Federal public lands to nonsubsistence hunting, when necessary, to conserve deer, moose, and mountain goat populations, continue subsistence uses, for reasons of public safety, or to assure the continued viability of wildlife populations.

In August 2020, the Board approved a revised closure policy, which stipulated all closures will be reviewed every four years (FSB 2020). The policy also specified that closures, similar to regulatory proposals, will be presented to the Councils for a recommendation and then to the Board for a final decision. Previously, closure reviews were presented to Councils who then decided whether to maintain the closure, submit a regulatory proposal to modify, or eliminate the closure (FSB 2007).

**Closure last reviewed:** 2015 - WCR15-02

**Justification for original closure (Section 815(3) criteria)**

Section §815(3) of ANILCA states:

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

The Board closed Federal public lands in Unit 5A, except Nunatak Bench from Oct. 15– Oct. 21, to taking of moose, except by residents of Unit 5A to assure a preferential subsistence opportunity of rural Alaska residents with C&T, effective 1991. The regulatory dates for the closure of Federal public lands to non-Federally qualified subsistence users were changed in 2000 from Oct.

15 – 21 to October 8 – 21 (P00-010), to reflect the change in the Federal moose season start date of October 8. Closure dates were again changed to Sept. 16-30 east of the Dangerous River effective during the 2018/2019 regulatory season to reflect the change in the Federal moose season start date of September 16.

### **Council recommendation for original closure**

The Council had not been established prior to the original closure, and thus there was no recommendation at that time. Since the establishment of the Council, the Council has supported the closure because it has provided opportunity for Federally qualified subsistence users to harvest moose in an area that typically receives relatively high hunting pressure.

### **State recommendation for original closure**

The State recommendation for the original closure was not found in the 1990 Federal Subsistence Board Meeting Book or in the archives.

## **Biological Background**

### Population trends

Moose were first sighted along the lower Alsek River drainage in Unit 5A East in the late 1920s and early 1930s. By the 1950s, the moose population had expanded its range westward to the Malaspina Forelands west of Yakutat Bay (**Figure 1**). The population grew rapidly and by the 1960s was estimated to be over 2,000 animals, which was likely above the carrying capacity of the range (Sell 2017). During the 1960s and early 1970s, the population declined due to both liberal harvest seasons, including cow hunts designed to protect the moose habitat, and severe winters in 1970 and 1972 that reduced survival and recruitment (Scott 2010).

In 1974, the moose population in Unit 5A was estimated to be approximately 300 animals (FWS 1996). Concern over low population numbers resulted in a hunting closure in Unit 5A from 1974–1977. After the hunting closures in the 1970s, the population slowly increased to about 600-800 animals, which appears to be carrying capacity of the area. In 1989, the State developed a management plan for Unit 5A Yakutat Forelands, which included the following objectives: 1) maintain a moose population of 850 animals post-hunt; 2) sustain an annual harvest of 70 moose; 3) provide a hunter success rate of 28%, and 4) maintain a post-hunt bull:cow ratio of 20:100 (ADF&G 1990). Regionwide goals for moose management include managing for the greatest hunter participation possible consistent with maintaining viable populations, sustained yield, subsistence priority, and the interests and desires of the public. The plan has not been formally updated, but the management objectives and harvest management strategies are updated in the management reports based on existing biological data and public input. The Board of Game has made a positive finding for customary and traditional use of moose in Game Management Unit 5 and set 50 moose as the Amount Necessary for Subsistence (ANS-Sell 2017).

The current State management objectives (Sell 2017) are:

- Post-hunt moose numbers (estimated): 600-800
- Annual hunter kill (average): 55
- Post hunt bull:cow ratio: 25:100
- Number of hunters (annual average): 250
- Hunter-days of effort (annual average): 1,025
- Hunter success (annual average): 28%

Population counts conducted in the 1970s and 1980s were based on annual winter moose surveys that had been adjusted using a 50% sightability correction factor to account for animals not seen during the survey (Smith and Franzmann 1979). However, more recent data from a sightability study on the Yakutat Forelands suggest that a 70% sightability correction factor was more appropriate (Oehlers 2007). The 70% correction factor, however, reflects good snow cover, which does not always occur during the population surveys. Ideally, a sightability logistic regression model would include covariates such as snow coverage, habitat type, and group size in addition to population data so that more accurate annual estimates can be obtained. However, due to variation in survey conditions such as timing, survey routes, number of trained personnel and variable snow conditions, these criteria have not been consistently recorded and thus only the raw survey data are used for abundance trend information (Barten 2006, Barten 2008a, Scott 2010). Consequently, results of aerial surveys should be considered a minimum population estimate and used primarily as an index for trend analysis.

Between 2000 and 2020, surveys of the Unit 5A Yakutat Forelands have been conducted as conditions permitted (**Table 1, Figure 1**). Some surveys have been limited to subsections of the forelands with a focus to obtain herd composition data rather than a total population estimate. Reliable herd composition surveys are not always feasible due to insufficient snowfall and aircraft availability relative to when bulls begin to shed their antlers (Sell 2017). Prior to 2005, surveys were conducted in open areas where concentrations of moose were known to occur. The distribution and movements of moose in addition to the observer's ability to detect moose during aerial surveys are highly variable and dependent on the weather conditions, timing, and amount of snow cover in the late fall. Thus, population counts prior to 2005 may have missed large segments of the moose population and are probably not very reliable for detecting population trends (Barten 2008a). In 2005, a more rigorous systematic survey design was developed using line transects which allowed for increased survey coverage, increased reliability of population estimates, reduced bias in the areas selected, and consistency between years.

**Table 1.** Moose survey results for Unit 5A, 2002-16 (Barten 2002, 2005, 2006, 2008b; Converse and Rice 2003; Churchwell 2020; Oehlers 2008a, b, c; Oehlers 2012; Scott 2010, 2011a,b; 2013a,b; Sell 2016a, b). Composition surveys emphasize sex and age ratio, rather than a total population estimate.

Survey Area	Month	Year	Composition Survey (Y/N)	# Bulls	# Cows	# Calves	# Unk.	Total	Bull:Cow
Yakutat Forelands	March	2002	Y	28	146	21	0	195	19:100
	March	2010	Y	28	146	21	0	195	19:100
Western Forelands (5A West)	Dec.	2003	N	3	23	23	140	189	<sup>1</sup>
	Dec.	2005	N	10	46	47	224	328	37:100 <sup>3</sup>
	Nov.	2006	Y	12	119	11	0	142	10:100
	Dec.	2007	N	24	21	21	200	266	11:100 <sup>3</sup>
	Nov.	2008	Y	23	67	4	0	94	34:100
	Dec.	2008	Y	24	166	31	0	221	14:100 <sup>3</sup>
	Nov.	2011	Y	28	141	60	0	229	20:100
	Dec.	2012	N	3	12	14	168	197	<sup>1</sup>
	Oct.	2013	Y	13	35	4	2	54 <sup>5</sup>	37:100
	Dec.	2013	N	18	36 <sup>4</sup>	41	117	212	12:100 <sup>3</sup>
	Dec.	2015	N	33	43	51	166	293	16:100 <sup>3</sup>
	Dec.	2016	N	68	39	43	140	290	38:100 <sup>3</sup>
Jan.	2020	N	4	5	5	216	230 <sup>5</sup>	<sup>1</sup>	
Eastern Forelands (5A East)	Dec.	2003	N	7	23	25	118	173 <sup>2</sup>	<sup>1</sup>
	Nov.	2005	Y	33	166	17	0	216	20:100
	Dec.	2005	N	31	25	28	221	305	12.6:100 <sup>3</sup>
	Dec.	2007	N	55	49	53	262	419	18:100 <sup>3</sup>
	Oct.	2013	Y	12	26	6	0	44 <sup>5</sup>	46:100
	Dec.	2015	N	76	85	100	274	535	21:100 <sup>3</sup>
	Dec.	2016	N	54	38	44	117	253 <sup>5</sup>	35:100 <sup>3</sup>
	Jan.	2020	N	2	9	11	93	115 <sup>5</sup>	<sup>1</sup>

<sup>1</sup>survey conducted after bulls started to drop antlers, no bull:cow ratio estimated

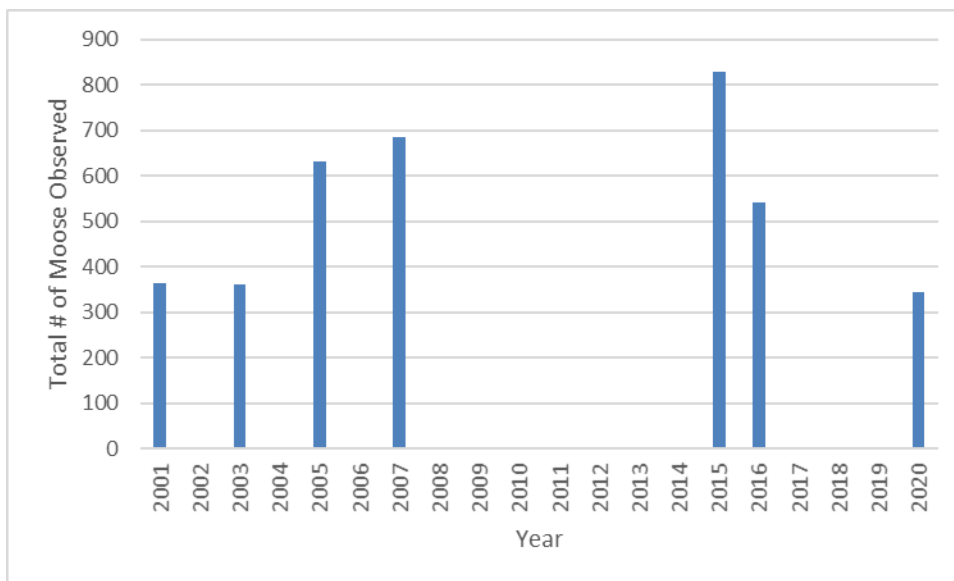
<sup>2</sup> area between Italo and Akwe rivers not surveyed due to poor conditions

<sup>3</sup> minimum estimate

<sup>4</sup> cows with calves only

<sup>5</sup> poor survey conditions=some areas not surveyed and/or high winds and flight speeds, thus total number of moose should be considered a minimum estimate. October 2013 survey conducted shortly after harvest season with no snow resulting in low detectability rates.

Following the hunting closures in the mid 1970s and the 1989 management plan, the Yakutat Forelands moose population slowly recovered to a total of approximately 632 and 685 moose in 2005 and 2007, respectively (**Table 1, Fig. 2**). Low bull:cow ratios were observed starting in 2006, particularly in Unit 5A West (**Table 1**). Following the 2007 survey, there were several severe winters, which likely reduced survival and recruitment and caused a decline in the moose population (Barten 2012). Complete population surveys, however, were not conducted between 2007 and 2014 (surveys during this period focused on sex and age composition). The age composition of bulls in the harvest from 2003-2012 suggested that the range of age classes were well represented in the population and that calf survival was high enough to provide continued harvest of bull moose at previous levels (Sell 2014).



**Figure 2.** Population estimates for moose in Unit 5A, 2001-2020 (Barten 2004, 2005, 2008b; Converse and Rice 2003; Sell, 2016a, b; Churchwell 2020)

The mild winters of 2014/2015 and 2015/2016 are thought to have resulted in improved over-winter survival for ungulate populations region wide (Scott 2017). In 2015 and 2016, a total of 828 and 543 moose, respectively, were observed on the Yakutat Forelands (**Figure 2**). Although the total number observed was lower in 2016 than 2015, those estimates may be more reflective of survey conditions than actual numbers. Percentage of calves was similar in 2015 and 2016 (18% and 17%, respectively), indicating healthy recruitment. Bull:cow ratios were higher in 2016 (36:100) than 2015 (19:100), meeting the State's management objective of 25 bulls:100 cows in 2016. The 2015 and 2016 survey results, considered as minimum estimates (not accounting for sightability), meet the State management objectives of 600-800 post-hunt numbers. The yearling and 2-3 year old component of the harvest suggests good recruitment



during the most recent reporting period (2010-2014; Sell 2017). In Unit 5A West, where harvest is predominantly by Federally qualified subsistence users, total numbers have remained relatively steady throughout the reporting period, with a bull:cow ratio ranging from 10:100 in 2006 to 38:100 in 2016.

Most recently, ADF&G conducted a population survey on January 17, 2020. Due to the late season timing, along with survey conditions (high wind and flight speeds), identification of sex and age (calves) was difficult. A total of 230 and 115 moose were observed in Unit 5A West and East, respectively for a total Unit 5A population estimate of 345 moose, which, even considering survey conditions, is below State management objectives. The observation rate of 43-66 moose/hour (average=55.6 moose/hr.) was slightly lower than the previous (2016) survey that had 59-72 moose/hour (average=64.5 moose/hr.), however this was likely in part related to the survey conditions (Churchwell 2020). Recent heavy snow years (2019-20 and 2020-21) may have impacted the population; given continued rapid harvest rates, however, the population is likely continuing to recover from previous (2011-12) harsh winters.

### Habitat

There have been no recent habitat studies conducted to assess the quality of the moose habitat in Unit 5A. Good body condition and high pregnancy and twinning rates indicate that the quality and quantity of forage habitat was good in the early to mid-2000s (ADF&G 2005, Oehlers 2007). A relatively stable low density population also indicates good quality habitat.

### Breeding

Breeding strategies of moose differ between the tundra (Alaska/Yukon-*Alces alces gigas*) and taiga (Eastern, northwestern, and Shira's subspecies-*Alces alces americana*, *Alces alces andersoni*, *Alces alces shirasi*) moose, and there are likely gradations between these 2 strategies (Schwartz 1997). Tundra moose tend to be relatively polygamous breeders and form assemblages during the rut, where dominant males can monopolize females. Consequently, one male can breed with many cows during one breeding season. In forest dwelling taiga moose, one bull will remain with a single female or small group of females for one or several days, likely breeding with only a few females during rutting season. Moose in Yakutat are likely in a mixing zone between *Alces alces gigas* and *Alces alces andersoni* (Schmidt et al. 2009). If females are not bred during their first estrous cycle, they may experience a recurrent estrous cycle and breed later in the season (Schwartz 1997). However, one study in Alaska (Schwartz and Hundertmark 1993) reported that an estimated 88% of calves were conceived during the first estrus cycle within a season.

The breeding season in interior Alaska ranges from September 28-October 12, with calving season approximately mid-May to mid-June, peaking the last 2 weeks of May (Schwartz 1997). Moose in Yakutat have been observed congregating from August-October, coinciding with the rutting season (Oehlers 2021). Older prime bulls come into rut earlier than younger bulls and

because rutting bulls are more vulnerable to harvest, hunting seasons held during the peak of rut may increase the harvest of prime bulls (Timmerman and Buss 1997). However, in a 1992 survey of 19 moose management jurisdictions, Wilton (1992) found that 74% of 136 moose hunting seasons coincided with the rutting period (September 16-October 15). Currently within Alaska, Federal fall seasons for moose in many units open in September, or even earlier, including in Unit 5A.

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

The Unit 5A moose population is a relatively recent subsistence resource, having presumably emigrated into the area along the Alsek River beginning in late 1920s and early 1930s. Previously, mountain goat, bears, and seals were the primary sources of meat for Yakutat residents (Sill 2015). The most recent data indicate that during 2015, 75% of households used moose while 20% reported harvesting (Sill 2015). Sixty-four % of households reported receiving moose and 20% reported harvesting moose. Forty-nine % of households reported that they hunted moose, of which 20% were successful.

Moose was the fourth ranked resource used by Yakutat households in 2015. Only halibut, Sockeye, and Chinook Salmon were used by a greater percentage of households. Further, moose accounted for 90% of the land mammal harvest in 2015 (Sill 2015).

### **Harvest History**

The annual moose harvest in Unit 5A ranged from 30-48 moose during 2002-11, with an average of 38 moose (Barten 2004, Sell 2014). Total harvest has ranged from 33-64 moose from 2012-20 (**Table 2**). An average of 19 and 29 moose were harvested annually in Unit 5A East and West, respectively, from 2012-20. The harvest has met or exceeded the quota guideline in Unit 5A West annually since 2012 (**Table 2**). Harvest in Unit 5A East, however, which is less accessible than 5A West, has not met the quota during this same time period, with the exception of 2020. Since 2012, total harvest has met the states ANS in 2015, 2017, 2019, and 2020.

Federally qualified subsistence users account for the majority of the harvest in Unit 5A West, accounting for 100% of the harvest annually from 2014-20 (**Table 2**). Although the State season was open in Unit 5A West for 8 days in 2019, with the Federal land closure in place very little non-Federal land is available for non-Federally qualified subsistence users to hunt, and all of the harvest was by Federally qualified subsistence users. In Unit 5A East, Federally qualified users accounted for an average of 50% of the harvest from 2012-20. Overall, Federally qualified subsistence users accounted for an average of 79% of the moose harvested in Unit 5A (except Nunatak Bench) from 2012-20. The lower percentage of the harvest from Federally qualified users in Unit 5A East is primarily due to the limited and costlier access relative to the west side. Unit 5A West receives more pressure in terms of number of hunters, averaging 74 hunters (all users) annually from 2012-20 versus 51 in Unit 5A East. Total number of days hunted is also higher in Unit 5A West, averaging 216 days annually versus 183 days in Unit 5A East during that

same time period (**Table 3**). Total effort (number of hunters and hunter-days) remains below the State management objectives for hunter participation. Particularly in recent years, the hunting effort is concentrated during a shorter season in Unit 5A West than East. Success rate is similar in both areas; 37% and 39%, respectively, in Unit 5A East and West from 2012-20, exceeding the State management objective of 28%.

**Table 2.** Total reported harvest of bull moose in Unit 5A 2012-2020 (Schumacher 2017 and Burch 2021). Designation of Federally qualified subsistence user is based on harvester's community of residence.

Year	Quota West	Total Harvest West (% Federally qualified users)	Quota east	Total Harvest East (% Federally qualified users)	Total
2012	25	27(89%)	30	13 (23%)	40
2013	25	25 (92%)	30	8 (50%)	33
2014	25	28 (100%)	30	16 (81%)	44
2015	25	29 (100%)	30	21 (48%)	51
2016	25	27 (100%)	30	17 (59%)	44
2017	30	35 (100%)	30	22 (46%)	57
2018	30	30 (100%)	30	17 (71%)	47
2019	30	30 (100%)	30	22 (46%)	52
2020	30	32 (100%)	30	32 (34%)	64

**Table 3.** Hunting effort by all users for moose in Unit 5A 2012-16 (Schumacher 2017 and Burch 2021). Numbers are reflective of all hunters who reported at least 1 day of hunting.

Area	Year	Total Number of Hunters	Total Number of Days Hunted	Success Rate	Average # of Days Hunted by Successful hunters	Average # of Days Hunted by all Hunters
5A West	2012	81	271	33%	2.9	3.3
	2013	89	328	28%	2.2	3.7
	2014	69	171	41%	2.0	2.5
	2015	80	233	36%	2.0	2.9
	2016	72	178	38%	1.3	2.5
	2017	68	190	37%	2.1	2.8
	2018	64	161	43%	1.9	2.5
	2019	63	204	35%	2.4	3.2
5A East	2012	42	175	31%	2.8	4.2
	2013	30	154	27%	2.6	2.9
	2014	54	200	30%	3.0	3.7
	2015	48	180	44%	3.4	3.8
	2016	47	183	36%	1.8	3.9
	2017	59	182	26%	2.3	3.1
	2018	40	129	23%	3.1	3.2
	2019	62	210	24%	2.3	3.4
	2020	73	234	20%	2.3	3.2

### Effects

If the closure is rescinded, there would be increased opportunity for non-Federally qualified users to harvest moose in Unit 5A. Without the closure, it is very likely that non-Federally qualified users would hunt earlier in the State season as Yakutat is easily accessible by daily commercial airlines services. Currently, Federally qualified subsistence users account for the majority of the moose harvested in Unit 5A, except Nunatak Bench and 100% of the moose harvested in Unit 5A West since 2014. The harvest quota has been met and the Federal season has been closed in Unit 5A West prior to the State season opening annually from 2014-2020, with the exception of 2019. If this closure is rescinded, non-Federally qualified users would be able to hunt Federal lands a week earlier west of the Dangerous River, resulting in increased competition between Federally qualified and non-Federally qualified users and thereby decreasing harvest opportunity of a limited resource for Federally qualified subsistence users.

## OSM PRELIMINARY CONCLUSION

- maintain status quo**  
 **modify or eliminate the closure**

### Justification

The Federal closure for Unit 5A moose remains important to the residents of Unit 5A as it provides for the continued subsistence use of the population as mandated by Title VIII of ANILCA. While the State's population and composition objectives were met in 2015 and 2016, slightly lower numbers during the January 2020 survey and recent heavy winters warrant caution and will be considered when establishing future quotas. Federally qualified subsistence users account for the majority of the moose harvested in Unit 5A, except Nunatak Bench and 100% of the moose harvested in Unit 5A West since 2014. The annual hunt by Federally qualified subsistence users takes place primarily in Unit 5A West where accessibility by boat or vehicle is much greater, and hunting expenses generally lower, than in Unit 5A East. The majority of the moose harvested are taken by Federally qualified users during the first two weeks of the season in Unit 5A West. The Federal season in Unit 5A West was closed prior to the State season opening annually from 2014-18 and again in 2020.

The number of moose available for harvest is limited as moose numbers remain at a relatively low density. Without the closure, non-Federally qualified users would be able to hunt Federal lands a week earlier in Unit 5A West, resulting in increased competition between Federally qualified and non-Federally qualified users and thereby decreasing harvest opportunity of a limited resource for Federally qualified subsistence users.. The status quo is necessary to continue subsistence uses of the moose population under Section 815(3) of ANILCA and does not violate the prohibitions (public safety, administration, and the continued viability of a particular fish and wildlife population) outlined in ANILCA Section 816(b). The closure to moose harvest on Federal public lands in the affected area will continue to be reviewed at least every four years as per the Federal Subsistence Board Closure Policy (FSB 2007, 2020).

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<b>WP22-14 Executive Summary</b>	
<b>General Description</b>	Proposal WP22-14 requests that the black bear harvest limit in Unit 6 be increased from one to two black bears per year, and that the Unit 6D season would close if the harvest quota was met. <i>Submitted by: Dan Schmalzer and Nick Docken of Cordova</i>
<b>Proposed Regulation</b>	<p><b>Unit 6—Black Bear</b></p> <p><i>Unit 6 —<del>1 bear</del> 2 bears. In Unit 6D a State registration permit is required. <span style="float: right;">Sept, 1 – June 30</span></i></p> <p><b>§____.26(n)(6)(ii) Unit-specific regulations:</b></p> <p><i>(A) You may use bait to hunt black bear between April 15 and June 15. In addition, you may use bait in Unit 6D between June 16 and June 30. The harvest quota in Unit 6D is 20 bears taken with bait between June 16 and June 30. <b>If the State harvest quota in Unit 6D (RL065) is met, the Federal season in Unit 6D will close at the same time as the State season.</b></i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

**DRAFT STAFF ANALYSIS  
WP22-14**

**ISSUES**

Proposal WP22-14, submitted by Dan Schmalzer and Nick Docken of Cordova, Alaska, requests that the black bear harvest limit in Unit 6 be increased from one to two black bears per year, and that the Unit 6D season would close if the harvest quota was met.

**DISCUSSION**

The proponents request the ability to harvest 2 black bears in a regulatory year. This would allow Federally qualified subsistence users additional opportunity to harvest red meat. Currently, if a hunter harvests a black bear in the fall, they cannot harvest another in the spring. They cite the cost of living, reduced ferry service, and COVID-19 restrictions as factors making Prince William Sound residents more dependent on wild renewable resources. Additionally, many local residents do not have access to moose and deer because boats or airboats are often necessary to harvest these species. Black bear hunting opportunity is easily accessed from the Copper River Highway and does not require a boat.

**Existing Federal Regulation**

**Unit 6—Black Bear**

*Unit 6 —1 bear. In Unit 6D a State registration permit is required.*

*Sept. 1 –  
June 30*

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

*(A) You may use bait to hunt black bear between April 15 and June 15. In addition, you may use bait in Unit 6D between June 16 and June 30. The harvest quota in Unit 6D is 20 bears taken with bait between June 16 and June 30.*

**Proposed Federal Regulation**

**Unit 6—Black Bear**

*Unit 6 —~~1 bear~~ 2 bears. In Unit 6D a State registration permit is required.*

*Sept. 1 –  
June 30*

## Unit 6—Black Bear

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

*(A) You may use bait to hunt black bear between April 15 and June 15. In addition, you may use bait in Unit 6D between June 16 and June 30. The harvest quota in Unit 6D is 20 bears taken with bait between June 16 and June 30. If the State harvest quota in Unit 6D (RL065) is met, the Federal season in Unit 6D will close at the same time as the State season.*

## Existing State Regulation

### Unit 6—Black Bear

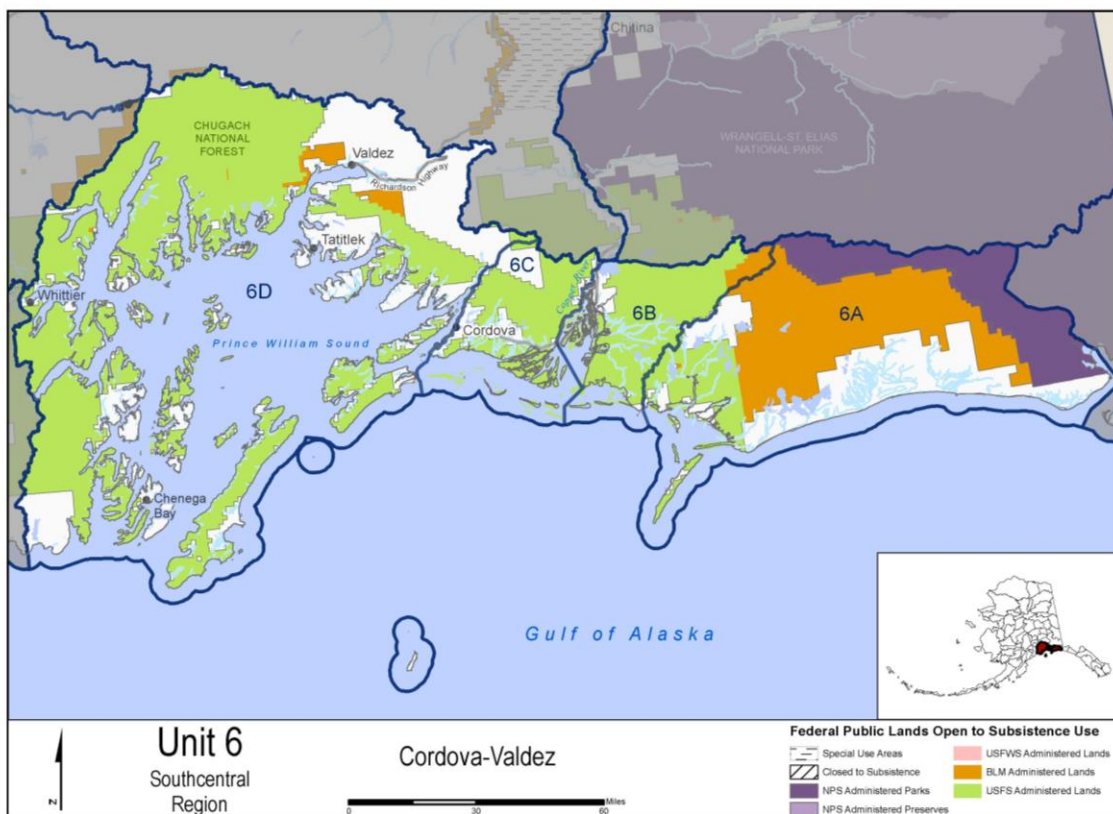
<i>Unit 6A, 6B — One bear (Residents and nonresidents)</i>	<i>HT</i>	<i>Aug. 20 – June 30</i>
<i>Unit 6C — One bear (Residents and nonresidents)</i>	<i>HT</i>	<i>Sept. 1 – June 30</i>
<i>Unit 6D — One bear every regulatory year by permit available online at <a href="http://hunt.alaska.gov">http://hunt.alaska.gov</a> or in person in Anchorage, Cordova, Fairbanks, Glenallen, Palmer, and Soldotna beginning Aug 25 (Residents and nonresidents)</i>	<i>RL065</i>	<i>Sept. 10 – Jun. 10</i>

## Extent of Federal Public Lands

Unit 6 is comprised of approximately 71% Federal public lands, and consist of 49% U.S. Forest Service (USFS) managed lands, 14% Bureau of Land Management (BLM) managed lands, and 8% National Park Service (NPS) managed lands (**Figure 1**).

## Customary and Traditional Use Determinations

Rural residents of Yakutat and residents of Units 6C and 6D (excluding residents of Whittier) have a customary and traditional use determination for black bear in Unit 6A. Rural residents of Units 6C and 6D (excluding residents of Whittier) have a customary and traditional use determination for black bear in Unit 6 remainder.



**Figure 1.** Unit 6 hunt area

## Regulatory History

In 1990, the Federal Subsistence Board (Board) adopted interim subsistence regulations for black bear hunting at bait stations that aligned with State regulations. The Federal and State bear baiting season in Units 6A, 6B, and 6C has been Apr. 15 – June 15 and, since regulatory year 2005/06, the State baiting season in Unit 6D has been Apr. 15– June 30.

The Alaska Board of Game (BOG) has taken several incremental measures to reduce black bear harvest in Unit 6D over the past 15 years. In 2003, Unit 6D was closed to the shooting of black bears from a boat. Completing a bear baiting clinic to establish a bear bait station was required in 2005. Also, in 2005 the BOG changed the season dates for Unit 6D from Sept. 1 – June 30 to Sept. 1 – June 10 to reduce harvest of black bears. Beginning in regulatory year 2009/10, the start of the Unit 6D black bear season was changed from Sept. 1 to Sept. 10 to further reduce harvest. The intent of shifting the start of the season 10 days later was to reduce the harvest of black bears as they move from salmon streams to the high country during the fall. Also, in 2009, the BOG approved the use of a harvest reporting system for Unit 6 to better track hunting effort for black bears.

In 2014, the Board adopted Proposal WP14-09 with modification to lengthen the season for hunting black bears with bait in Unit 6D by 2 weeks to run through June 30, to require the use of a Federal registration

permit, and to set a quota of 20 black bears to be taken over bait during the extended Federal baiting season. Requiring the use of a Federal registration permit was seen as a way to better track harvest of black bears at a time when there was a growing conservation concern for the species but use of the State baiting permit was allowed in 2016.

In February 2015, the BOG adopted Proposal 210 to change the black bear hunt in Unit 6D to a registration hunt. The BOG concluded that bears in the area were being overharvested and that a better management tool was needed to assess and control harvest. This new regulation became effective July 1, 2015.

On February 27, 2015, the Alaska Department of Fish and Game (ADF&G) issued an Emergency Order closing the State black bear season in Unit 6D, effective May 27, 2015. This was in response to a steady decline in the black bear population and a tripling of the harvest between the 1990s and 2007, along with a marked decrease in harvest in 2012 and 2013. In addition, the percentage of females in the harvest had exceeded management goals since 2006.

Additionally, on May 19, 2015 wildlife special action request WSA15-09, submitted by ADF&G requested that the Federal subsistence black bear season close on May 27, the same effective date as the Emergency Order issued by the State. They also requested that the Federal Unit 6D black bear permit required from June 11 through June 30 be extended to begin on May 27, so that Federal subsistence users are in compliance with both State and Federal permit requirements. This special action request was unanimously approved by the Board with modification, temporarily extending the dates of the Unit 6D Federal subsistence black bear season from May 27, 2015 through June 30, 2015, because of the small number of black bears harvested by Federally qualified rural residents.

### **Biological Background**

Black bears are common throughout Unit 6, with the exception of Kayak and Middleton Islands along the North Gulf Coast of Alaska, and Montague, Hinchinbrook, Hawkins, and several smaller islands in Prince William Sound (Crowley 2011). The State management goal for black bear in Unit 6 is to maintain a black bear population that will sustain a 3-year average annual harvest of 200 bears composed of at least 75% males with a minimum average skull size of 17 inches (Crowley 2011). The proportion of females taken exceeded the recommended management objective of 25% in 2006, 2007, and 2009 (Crowley 2011).

While there are no accurate population data for black bears in Unit 6, black bear densities tend to be highest in western Prince William Sound (Unit 6D) and lowest along the North Gulf Coast and eastern Prince William Sound (Units 6A, 6B, and 6C) (McIlroy 1970; Modafferi 1978, 1982). Black bear populations in Unit 6 fluctuate due to the severity of winter weather, food abundance, hunting pressure and in some areas, competition with and predation by brown bears (McIlroy 1970, Schwartz et al. 1986).

Harvest monitoring and assessment has been the primary method used to assess the status of the black bear population in Unit 6. In 2009, the BOG approved the use of a harvest reporting system that incorporated an assessment of effort in addition to the harvest (Crowley 2011). Since the late 1980s,

ADF&G has been using the skull size as a biological objective because it is thought that these changes may indicate changes in population size, harvest composition, and the sustainability of harvest levels. A decreasing skull size may indicate a decline in older bears in the population, which may be indicative of a population decline (Lowell 2011). To assess the population age structure, which is a measure of population health, skull size and harvest densities are compared between 8 geographic areas that correspond to well-defined watersheds within Unit 6 (Crowley 2011). The decline in skull size of male black bears, along with high annual harvest during the 5-year period from 2005–2009, when compared to the previous two 5-year periods, suggested that harvest may be impacting the age structure of the Unit 6 black bear population. A similar trend was not found for female harvested bears.

A sharp decline in black bear harvest was observed in the years following the severe winter of 2011-2012, which may have resulted in low recruitment of young for the following years. This information and the reports of fewer black bear sightings by many user groups prompted the U.S. Forest Service and ADF&G to begin a collaborative research project on Prince William Sound black bears. Fifty-three bears were fitted with satellite/GPS collars during the summers of 2016, 2017, and 2018. That project is ongoing.

### **Harvest History**

Historical and ethnographic accounts of the Alutiiq of Prince William Sound and the Eyak Indians of the Copper River Delta, the traditional inhabitants of the Chugach, indicate that black bears were an important subsistence food source (Simeone 2008). Although black bears were once a major subsistence staple for residents in Prince William Sound communities, Sitka black-tailed deer have replaced black bears in importance according to local residents (Simeone 2008). Between 1986 and 2006, residents of Unit 6, resident hunters living outside of Unit 6, and nonresidents accounted for 11%, 58%, and 31% of the black bear harvest in Unit 6, respectively. A majority of the harvest (85%) occurred in Unit 6D (Simeone 2008). From 2005 – 2010, the hunting pressure and take of black bears in Unit 6 was greatest in Unit 6D (83–86%), which coincides with the greatest densities of black bears and ease of access by Anchorage hunters through the Anton Anderson Memorial Tunnel (Whittier Tunnel) (Simeone 2008, Crowley 2011). An average of 427 black bears were taken per regulatory year between 2004 and 2013, which exceeds the State management goal to average 200 black bears over a 3-year period.

Without accurate population estimates it is difficult to determine if current harvest levels are sustainable. Although it is difficult to determine the status of black bear populations using harvest data (Garshelis 1993), the decrease in age of harvested male bears during the high harvest from 2005 – 2009 suggested that the harvest was having a population level effect (reducing the overall size of the population) (Crowley 2011). More compelling was the sharp drop in total Unit 6D harvest during 2012 and 2013 (**Table 1**). Additionally, the number of bears taken over bait in Unit 6D, where bear baiting is most prevalent, almost doubled between 2005 (50 bears) and 2009 (97 bears) but declined again in 2011 (**Table 2**).

The total reported harvest of black bears taken in Unit 6D by Federally qualified users, from 2010 to 2019 was 24 black bears (Westing 2021). Between 2010 and 2019, Federally qualified subsistence users harvested 0-7 bears in Unit 6D, accounting for just 1.0% of the total Unit 6D black bear harvest on

average. The percentage of black bears taken over bait by all hunters in Unit 6D ranged from 7% to 35% between 2010 and 2020.

**Table 1.** Black Bear harvest in Unit 6D from 2010-2019 (Westing 2021, pers. comm.).

Year	Chenega Bay	Cordova	Tatitlek	Total by Federally qualified subsistence users	Total 6D Harvest	% harvested by Rural Residents
2010	1	0	0	1	453	0.2%
2011	3	3	1	7	467	1.5%
2012	2	0	0	2	357	0.6%
2013	1	1	1	3	188	1.6%
2014	0	0	0	0	105	0
2015	0	1	0	1	91	1.1%
2016	0	4	0	4	140	2.3%
2017	1	1	0	2	212	0.9%
2018	1	2	0	3	201	1.5%
2019	0	1	0	1	221	0.5%
Average	0.9	1.3	0.2	2.4	243.5	1.0

**Table 2.** Black Bear harvest over bait in Unit 6D from 2005-2020 (Westing 2021, pers. comm.).

Year	Harvested over bait	Not harvested over bait	% of harvest baited
2010/2011	67	386	15%
2011/2012	33	434	7%
2012/2013	27	331	8%
2013/2014	31	157	16%
2014/2015	26	79	25%
2015/2016	32	59	35%
2016/2017	37	103	26%
2017/2018	47	166	22%
2018/2019	28	178	14%
2019/2020	33	188	15%

### Effects of the Proposal

If adopted, this proposal would allow Federally qualified subsistence users to harvest 2 black bears in Unit 6. This would allow additional harvest opportunity for rural residents of Unit 6 that would help offset increases in the cost of living, reductions in ferry service, and restrictions imposed to mitigate the COVID pandemic.

In Unit 6D, where conservation concerns have existed, Federally qualified subsistence users have harvested less than 8 bears/year, from a total harvest that has ranged from 91-453 bears/year between 2010 and 2020. While some conservation concerns still exist for black bears in Unit 6D, concern would be mitigated if the Federal season closed when the State closes its season, if the black bear harvest quota is reached in Unit 6D (RL065).

Current Federal regulations in Unit 6D require a State registration permit. Permission from ADF&G would be needed to use a State permit with a different harvest limit under Federal regulations. Alternatively, Federal users may be able to obtain two State registration permits, or a Federal permit could be established.

## **OSM PRELIMINARY CONCLUSION**

**Support Proposal WP22-14.**

### **Justification**

Increasing the Federal subsistence harvest limit from 1 to 2 black bears in a regulatory year would increase subsistence harvest opportunity and allow Federally qualified rural residents of Unit 6 to harvest an additional bear, providing an additional source of red meat. The small number of black bears harvested by Federally qualified subsistence users in Unit 6D and closing the Federal subsistence season in Unit 6D if the State quota is met, mitigate conservation concerns.

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<b>WP22-12 Executive Summary</b>	
<b>General Description</b>	Proposal WP22-12 requests that the deer season in Unit 6 be extended through January 31. <i>Submitted by: Southcentral Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Unit 6—Deer</b></p> <p><i>5 deer; however antlerless deer may be taken only from Oct. 1–Dec. 31. <del>Jan. 31.</del></i>      <i>Aug. 1–<del>Dec. 31</del>–Jan. 31</i></p> <p><i>Unit 6D—1 buck</i>      <i>Jan. 1–Jan. 31</i></p>
<b>OSM Preliminary Conclusion</b>	<p><b>Support</b> Proposal WP22–12 <b>with modification</b> to restrict the harvest limit during the January season to two deer.</p> <p>The modified regulation should read:</p> <p><b>Unit 6—Deer</b></p> <p><i>5 deer; however antlerless deer may be taken only from Oct. 1–Dec. 31. <b>Up to 2 of the 5 deer harvest limit may be taken between Jan. 1 and Jan. 31.</b></i>      <i>Aug. 1–<del>Dec. 31</del>–Jan. 31</i></p> <p><i>Unit 6D—1 buck</i>      <i>Jan. 1–Jan. 31</i></p>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>2 oppose</b>

**DRAFT STAFF ANALYSIS**  
**WP22-12**

**ISSUES**

Proposal WP22-12, submitted by Southcentral Alaska Subsistence Regional Advisory Council, requests that the deer season in Unit 6 be extended through January 31.

**DISCUSSION**

The proponents believe that lengthening the deer season in Unit 6 through January 31 should be authorized because many subsistence users have not been able to harvest enough deer to feed their families due to mild winters, which decreases hunter success. Early in the season, deer are often found in rugged, mountainous terrain and hunting them can be physically demanding, and deer can be difficult to spot in dense brush. Winter snowpacks that push deer to the beaches where they are more easily accessed by hunters have occurred later in recent winters. Hunters that cannot participate in early-season hunts must wait until later in the season when reduced foliage allows deer to be more easily seen and heavy snowpack forces deer down near the coast where they are more accessible.

**Existing Federal Regulation****Unit 6—Deer**

*5 deer; however, antlerless deer may be taken only from Oct. 1–Dec. 31*

*Aug. 1–Dec. 31*

*Unit 6D – 1 buck*

*Jan. 1- Jan. 31*

**Proposed Federal Regulation****Unit 6—Deer**

*5 deer; however antlerless deer may be taken only from Oct. 1–~~Dec.~~  
~~31~~ Jan. 31.*

*Aug. 1–~~Dec. 31~~–Jan.  
31*

*Unit 6D – 1 buck*

*Jan. 1–Jan. 31*

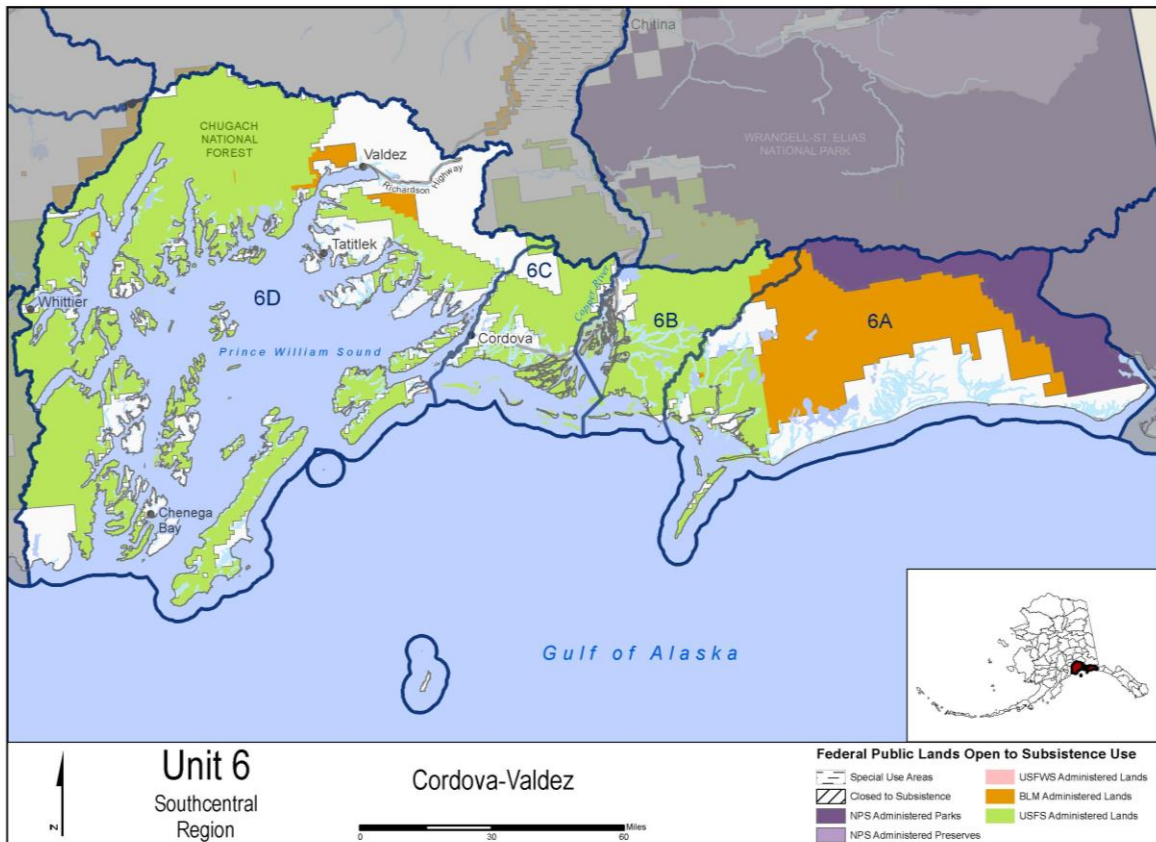
**Existing State Regulation**

**Unit 6 – Deer**

<i>Residents—5 deer total</i>	<i>Bucks</i>	<i>Aug. 1–Sept. 30</i>
	<i>Any deer</i>	<i>Oct.1–Dec. 31</i>
<i>Nonresidents—4 deer total</i>	<i>Bucks</i>	<i>Aug. 1–Sept. 30</i>
	<i>Any deer</i>	<i>Oct. 1–Dec. 31</i>

**Extent of Federal Public Lands**

Federal public lands comprise approximately 71% of Unit 6 and consist of 49.2% U.S. Forest Service managed lands, 13.8% Bureau of Land Management managed lands, and 7.6% National Park Service managed lands (**Figure 1**).



**Figure 1.** Unit 6 hunt area

## **Customary and Traditional Use Determinations**

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for deer in Unit 6; therefore, all rural residents of Alaska may harvest deer in Unit 6.

## **Regulatory History**

In 1990, the Board adopted subsistence regulations for deer hunting from State regulations. The initial Federal deer season was Aug. 1–Dec. 31 with a limit of 5 deer, but antlerless deer could only be taken from Sept. 15–Dec. 31.

In 1991, Proposal P91-118 was submitted by the Chugach National Forest, Forest Supervisor to reduce the harvest limit from 5 to 4 deer and shorten the antlerless deer season from Sept. 15–Dec. 31 to Nov. 1–Dec. 31 in Units 6C and 6D. The proposal was submitted due to concerns about a population decline following heavy snow years. The Board adopted the proposal with modification to extend the regulatory changes to all of Unit 6 to match recent changes to State regulations (FWS 1991).

In 1996, the Board adopted Proposal P96-21, which extended the antlerless season from Nov. 1–Dec. 31 to Oct. 1–Dec. 31 (FWS 1996).

In 2012, the Alaska Department of Fish and Game (ADF&G) closed the State deer season to residents and nonresidents on December 7, 2012 via Emergency Order. The closure was due to heavy snowfall that concentrated deer on and near beaches, which likely increased the population's vulnerability to harvest. The Copper River/Prince William Sound Fish and Game Advisory Committee (Advisory Committee) and ADF&G agreed the deer population in Unit 6 should be protected from overharvest following the winter of 2011/12, when the population experienced an estimated overwinter mortality of 50%–70% (Westing 2014). The Advisory Committee recommended that both the State and Federal deer seasons be closed on December 7 and that the Cordova District Ranger be delegated the authority to close the season when there are conservation concerns (Copper River/Prince William Sound Fish and Game Advisory Committee, 2012).

In 2012, the Board approved Emergency Special Action (WSA12-10) with modification, shortening the antlerless deer season from Oct. 1–Dec. 31 to Oct.1–Dec. 7 (FWS 2012). The modification gave the Cordova District Ranger the ability to close the season for all hunting if further conservation concerns arose. Federally qualified subsistence users were still able to harvest antlered deer until December 31, 2012.

In 2013, the State issued an Emergency Order to close the resident and nonresident antlerless deer season in Unit 6 at 11:59 p.m. on October 31, 2013. Subsequently, the Board closed Federal public lands in Unit 6 (WSA13-07) to the harvest of antlerless deer by Federally qualified subsistence users, effective at 11:59 p.m. on Nov. 1, 2013 (FWS 2013). These actions were taken to reduce the hunting mortality of female deer and aid in population recovery following the severe winter of 2011/12.

In 2016, the Board adopted Proposals WP16-11 and WP16-12, addressing season length and harvest limits for deer in Unit 6. Proposal WP16-11 lengthened the season in Unit 6D through January 31 with a harvest limit of 1 buck, citing increased difficulty harvesting deer early in the season because of later onset of winter snows due to climate change. The extended season was limited to just bucks to minimize impacts to the population that could result from harvesting females. Proposal WP16-12 increased the Federal harvest limit from 4 to 5 deer in Unit 6, recognizing that the Federal harvest limit had been lower than the State harvest limit.

### **Biological Background**

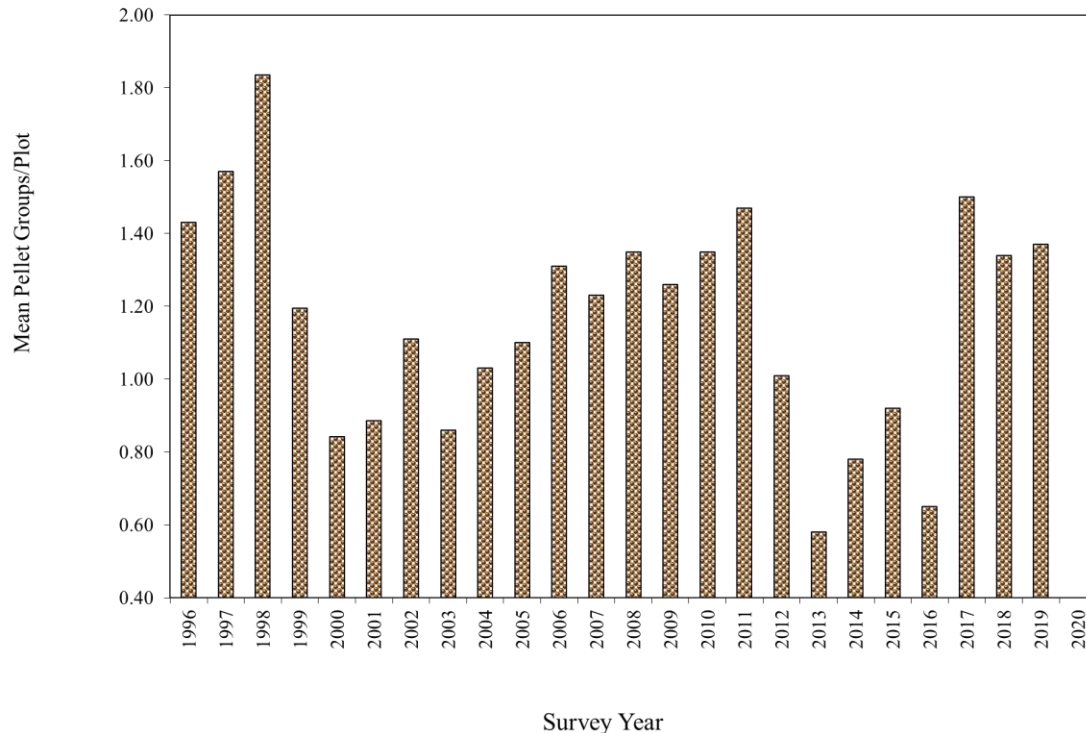
Sitka black-tailed deer were introduced to Unit 6 between 1916 and 1923 (Paul 2009). The deer population rapidly increased and expanded throughout Prince William Sound (Reynolds 1979). Sitka black-tailed deer are at the northern limit of their range in Unit 6; however, the population has thrived due to the mild, maritime climate conditions in Prince William Sound, which are similar to their natural range in coastal southeast Alaska (Shishido 1986 *referenced in* Crowley 2011).

Sitka black-tailed deer occupy a variety of habitats throughout the year, from low elevation forests and beaches to alpine habitats (Schoen and Kirchhoff 2007). Deer are more dispersed during summer, but snow depth restricts their winter distribution to lower elevations (Schoen and Kirchhoff 2007). The breeding season begins in late October and peaks in late November (Schoen and Kirchhoff 2007). Throughout the species' range, bucks generally shed their antlers between mid-December and mid-April (Anderson and Wallmo 1984), but in a British Columbia study most antlers were dropped between January and March (British Columbia Ministry of Environment, Lands and Parks 2000). In southcentral Alaska, hunters commonly observe the beginning of antler shed during the latter part of the hunting season in December.

The deer population in Prince William Sound is limited by snow depth and duration. Heavy snow events have caused multiple major winter mortality events in the area (Reynolds 1979, Crowley 2011). Populations typically increase and then disperse after a series of mild winters, but decline following severe winters (Reynolds 1979, Crowley 2011). Deep snow and high harvest during the winter of 2011/2012 resulted in an estimated mortality of 50%–70% of the deer population in Prince William Sound (Westing 2014). Deep snow concentrates deer along beach fringes, which can be overgrazed if deer are forced to remain there for an extended period of time, and can result in starvation (Reynolds 1979). Deer are also more vulnerable to harvest while concentrated on the beaches and harvesting under these circumstances could become additive to total mortality, rather than compensatory, and result in higher total winter mortality. Predation is not considered a significant mortality factor for deer in Prince William Sound (Reynolds 1979).

The State has set a population objective of 24,000–28,000 deer with an annual harvest objective of 2,200–3,000 deer in Unit 6; however, currently there are no means of estimating the abundance of deer in the unit (Crowley 2011, Westing 2013). Instead, ADF&G and the Chugach National Forest use deer-pellet surveys in Unit 6D, which encompasses Prince William Sound, as an index of the relative density of deer. The mean number of deer pellet groups observed declined overall between 1996 to 2019 (**Figure 1**), but

showed a marked increase from 2017-2019, approximating 1996 levels (Westing 2013). However, deer pellet surveys are not sensitive to previous year winter mortality events, because deer deposit pellets through most of the winter until succumbing to starvation in the spring (Crowley 2012, pers. comm.).



**Figure 2.** Deer pellet density observed along transects in Unit 6. Deer pellet density provides an index of the relative density of deer in the unit (Crowley 2011, Crowley 2012, pers. comm., Westing 2013, 2014, Westing 2021, pers. comm.).

Thus, there is a one year lag between mortality events and decrease in deer pellet density. Deer pellet counts conducted in 2012 and 2013 by ADF&G and the U.S. Forest Service corroborated the 50-70% mortality rate during the severe winter in 2011/2012 (Crowley 2011, Westing 2013). The 2012/2013 mean number of pellet groups per plot (0.58) was the lowest recorded by ADF&G since 1995 and represented a 61% decline from 2010/2011. Biologists also found evidence of the mortality event during the deer pellet surveys conducted in June 2012. Ten deer carcasses were encountered during transects, whereas zero to one are encountered during normal years. Although differences in topography and snow retention among the islands in Prince William Sound can result in local variation in deer densities, declines in deer pellet densities were observed on all islands and in nearly every location during the 2013 survey, but have largely recovered since then (**Figure 1**, Westing 2021).

## Harvest History

Prior to 2011, deer harvest in Unit 6 was estimated from harvest questionnaires mailed to a sample of hunters who were issued State harvest tickets. It is difficult to identify deer harvested by Federally qualified subsistence users, as results are categorized by residents of Unit 6 (local residents), residents outside of Unit 6 (nonlocal residents), and nonresidents (**Table 1**). Thus, the local and nonlocal resident categories include both Federally qualified subsistence users and non-Federally qualified subsistence users. However, beginning in 2011/2012, harvest reports were given to each user issued a State harvest ticket, improving reporting by connecting each user to a community. The interim harvest report showed that approximately 45% of the reported resident harvest was by local Federally qualified subsistence users (residents of Cordova, Chenega Bay, Tatitlek, and Whittier), 50% by non-Federally qualified Alaska residents, and 5% by nonlocal Federally qualified subsistence users (ADF&G 2012). Approximately 98% of the reported harvest by local Federally qualified subsistence users was from Cordova residents (ADF&G 2012), which was similar to the results of the household survey conducted in 2003 (95% of reported harvest). The majority of harvest by non-Federally qualified subsistence users was from Anchorage residents (approximately 38% of reported harvest), and 5% of the reported harvest was associated with Valdez residents, which is a nonrural community in Unit 6 (ADF&G 2012). Local and nonlocal residents were the primary users (29% and 66% of the estimated hunters, respectively) and accounted for 39% and 59% of the estimated harvest between 2010/2011 and 2019/2020, respectively (**Table 1**). McLaughlin (2015) reported a decline in hunter success during the winter of 2014-2015. This may be due in part to the relatively warm winter which allowed the deer to remain more dispersed at higher elevations where they are less available to Federally qualified subsistence users (Westing 2014). Local residents have the highest success rates of the deer hunters in Unit 6, averaging 1.6 deer per year between 2010/11 and 2019/20 (**Table 1**).

From 2006 to 2012, the sex ratio of the harvest was approximately 62% male and 38% female (Crowley 2011, Westing 2013). Harvest reports between 2005/2006 and 2009/2010 showed that most of the annual deer harvest occurred during October (19%–35%), November (25%–35%), and December (18%–24%) (Crowley 2011, Westing 2013). Few deer have been harvested during the extended January season since the season was lengthened in 2016. Harvest chronology is similar to previous years, as users often prefer hunting after snow has pushed deer to lower elevations and because the rut, which occurs in November, increases the harvest vulnerability of bucks (Crowley 2011, Westing 2013). Deer were primarily harvested by hunters using boats (76%–86%) as their primary transportation method (Crowley 2011, Westing 2013). A large proportion of the yearly take of deer by the residents of Cordova, the largest of the three communities, occurs on Hawkins Island, which is in relatively close proximity to town.

## Cultural and Traditional Use

Deer are an important resource for the subsistence way of life for residents of Unit 6. The most recent data from comprehensive household subsistence surveys in Unit 6, which were conducted by ADF&G in 2014 in Chenega Bay, Cordova, and Tatitlek, demonstrate the importance of deer. In Chenega Bay, 8 of the 12 participating households (75% of the sample; there was an estimate of 17 total households in the community) reported using deer on a deer in a 2014 comprehensive household subsistence survey



(ADF&G 2021a). More households in the survey used deer than any other large land mammal. Residents in the survey reported harvesting a total of 6 deer for a total weight of 259.2 lbs. It is estimated that the community harvested 9 deer for a total weight of 367.2 lbs.

More residents of Tatitlek also used deer than any large land mammal. In the 2014 comprehensive household survey, 17 of the 21 participating households (81% of the sample; there was an estimated 27 households in the community) reported that they used deer (ADF&G 2021c). Residents claimed that they harvested 28 deer, and it is estimated that the community harvested a total of 38 deer. In Cordova, 83 of the 184 participating households (45% of the same; there was an estimate of 950 households in the community) reported using deer (ADF&G 2021b). Residents reported harvesting 91 deer, and it is estimated that the whole community harvested 472 deer. In terms of large land mammals, only moose was used by more residents than deer in the sample.

Deer has also been one of the most important resources for the culture and traditions of those living in Unit 6, including food sharing. In all three of the communities surveyed, more households shared deer with others than any other large land mammal (ADF&G 2021a, 2021b, and 2021c). In Chenega Bay, 8 households said that they received deer from others (67% of the sample), and 4 households (25% of the sample) claimed that they gave it to others. One-hundred and twenty-one of the surveyed households (66% of the household) reported receiving deer from others, and 64 households (35% of the sample) gave it to others. In Tatitlek, 10 households in (48% of the sample) claimed that they received deer from others, and 9 households (43% of the sample) said that they gave it to others. These findings demonstrate that deer is one of the most important wild resources used for resource redistribution and maintaining social networks in the region.

According to locals, the capacity to harvest deer is variable and depends on winter weather. A large proportion of the yearly take of deer by the residents of Unit 6 is in within the unit (Fall 2006). Local hunters have the most success hunting deer when there is snow. At the February 2021 Southcentral Regional Advisory Council (Council) meeting, the proponent explained: “Deer hunting is very challenging earlier in the season, it's only very late in the season when a lot of people are able to participate, and the deer are sort of pushed down [by snow] and not on the peaks. And that season is getting later and later” (SCRAC 2021b). Supporting this theory that it is more difficult to harvest deer when there isn't snow, another resident at the meeting reported “I hunted four times this year and I didn't connect once, so that's not too common, although I didn't get a chance to hunt when the snow flew” (SCRAC 2021a). The association between snowfall and harvest rates as been mentioned at past Council meetings. In the March 2019 meeting, a resident said, “[It was] a mild winter. Good for the deer population assuming, but that also correlates to probably lower harvest rates because of less snow conditions concentrating the deer in the places where they are harvested” (SCRAC 2019). Local knowledge posits that it is easier to harvest deer during snowy winter months.

**Table 1.** Unit 6 deer harvest 2010-2020 (Crowley 2012, pers. comm., Westing 2013, 2014, FWS 2015, Westing 2021, pers. comm.).

Year	Local resident		Nonlocal resident		Nonresident		Total deer harvested
	Hunters	Deer harvested (deer/hunter)	Hunters	Deer harvested (deer/hunter)	Hunters	Deer harvested (deer/hunter)	
2010/2011	352	805(2.2)	775	778(1.0)	60	60(1.0)	1643
2011/2012	455	1202(2.6)	888	1426(1.6)	51	48(0.9)	2676
2012/2013	196	156(0.8)	606	367(0.6)	50	13(0.3)	536
2013/2014	212	228(1.1)	490	303(0.6)	41	3(0.1)	534
2014/2015	360	434(1.2)	793	858(1.1)	37	6(0.2)	1298
2015/2016	443	655(1.5)	936	977(1.0)	52	54(1.0)	1686
2016/2017	508	907(1.8)	1216	1601(1.3)	74	46(0.6)	2554
2017/2018	412	558(1.4)	943	849(1.3)	85	48(0.6)	1455
2018/2019	461	773(1.7)	888	916(1.0)	56	16(0.3)	1705
2019/2020	444	773(1.7)	1102	1319(1.2)	63	49(0.8)	2141

### Other Alternatives Considered

In addition to the proposal submitted by the proponent, and the modification suggested by OSM in the preliminary conclusion, another modification considered would be to allow two of the five deer harvest limit to be either-sex, while the remainder must be antlered bucks. This would allow additional opportunity, by allowing all five deer to be taken in the extended season. It would address conservation concerns by limiting the harvest of females to two, and conserve bucks by only allowing those retaining antlers to be harvested. This regulation would also be more complicated and could be difficult to enforce as antlers readily fall off of bucks after or during harvest late in the season.

### Effects of the Proposal

If this proposal is adopted, it would lengthen the deer season by one month through January 31 in Unit 6. A longer season would provide increased opportunity for Federally qualified subsistence users to harvest deer during the winter when they are more accessible because snow often pushes deer to lower elevations and onto the beaches in Prince William Sound. By allowing the harvest of either sex deer during the

extended season, hunters would not have to discriminate between does, and bucks that have already shed their antlers.

Although the deer population in Unit 6 has largely recovered from the decline after the severe winter of 2011-12, deer are more vulnerable to harvest when pushed to beaches where they are easily accessed by hunters on boats. It is thought that when winter conditions are severe, hunter harvest can become an additive source of mortality to winter kill. Additionally, heavy harvest of does can slow recovery of the deer population after severe winter events.

Federally qualified subsistence users, especially residents of Cordova, harvest a significant portion of the deer taken in Prince William Sound, and are responsible for most of the harvest from Hawkins and Hinchinbrook Islands. While, few bucks have been harvested from Unit 6D during the January season since 2016, increasing the harvest limit and allowing the harvest of does late in the season would likely increase participation in the late season hunt.

## OSM PRELIMINARY CONCLUSION

**Support** Proposal WP22–12 **with modification** to restrict the harvest limit during the January season to two deer.

The modified regulation should read:

### **Unit 6—Deer**

*5 deer; however antlerless deer may be taken only from Oct. 1–Dec. 31. Up to 2 of the 5 deer harvest limit may be taken between Jan. 1 and Jan. 31.*

*Aug. 1–~~Dec. 31~~ Jan. 31*

*Unit 6D—1 buck*

*Jan. 1–Jan. 31*

## **Justification**

While lengthening the deer season by one month through January 31 and allowing the harvest of does would provide additional opportunity to harvest red meat, it also increases harvest pressure at a time when deer can be pushed to beaches by deep snow where they are most vulnerable. Qualified rural residents already have a long and liberal season for deer in Unit 6, extending 5 months from 1 August through 31 December for up to 5 deer, and an additional month through 31 January for up to one buck. The proposed modification would reduce the impact to deer populations by limiting harvest during the time when they are most vulnerable, but still provide additional opportunity for qualified rural residents. This would also reduce additive mortality during more severe winters and speed recovery of the deer populations following these events.

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## WRITTEN PUBLIC COMMENTS

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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

Attn: Theo Matuskowitz,  
Office of Subsistence Management  
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska  
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris  
P.O. Box 32403  
Juneau, Alaska 99803

*Richard Harris*

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAoyD...> 1/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212**

CHARLES SCHULTZ <cjs16@me.com>

Sun 7/18/2021 3:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention Theo Matuskowitz,  
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12. Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoonah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration. Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration ,  
Charles Schultz  
Juneau, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAD6p...> 1/2

<b>WP22-13 Executive Summary</b>	
<b>General Description</b>	Proposal WP22-13 requests that deer be removed from the Unit 6 specific designated hunter regulation, allowing any Federally qualified subsistence user to designate another qualified user to harvest deer on their behalf in Unit 6, as is allowed for large mammals in most of the rest of Alaska. <i>Submitted by: Southcentral Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>§_____.26(n)(6)(ii) Unit-specific regulations:</b></p> <p><i>(D) A Federally qualified subsistence user (recipient) who is either blind, 65 years of age or older, at least 70 percent disabled, or temporarily disabled, may designate another Federally qualified subsistence user (designated hunter) to take any moose, <del>deer</del>, black bear and beaver on their behalf in Unit 6, and goat in Unit 6D, unless the recipient is a member of a community operating under a community harvest system. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but may have no more than one harvest limit in their possession at any one time.</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>



## DRAFT STAFF ANALYSIS WP22-13

### ISSUES

Proposal WP22-13, submitted by the Southcentral Alaska Subsistence Regional Advisory Council, requests that deer be removed from the Unit 6 specific designated hunter regulation, allowing any Federally qualified subsistence user to designate another qualified user to harvest deer on their behalf in Unit 6, as is allowed for large mammals in most of the rest of Alaska. Currently, only elderly or disabled hunters may designate another to harvest deer on their behalf in Unit 6.

### DISCUSSION

The proponents would like to change the current designated hunter regulation, specific to Unit 6, so that any Federally qualified subsistence user could designate another qualified user to harvest deer on their behalf. Hunting deer can be physically demanding, especially early in the season, before snow pushes deer to lower elevations. This would allow one member of a family, who is capable of harvesting deer early in the season, to fill the permits of other family members or other individuals later in the season. Currently, a hunter must be blind, at least 65 years of age, 70% disabled, or temporarily disabled to designate another hunter to harvest deer on their behalf.

This analysis, in consultation with the proponent, addresses the original intent of the proponent by just removing “deer” from the existing Unit 6 designated hunter provision. The additional text contained in the proposal as submitted, stating that qualified rural residents may designate others to harvest deer on their behalf, is unnecessary, as it is addressed in existing Federal regulation.

### Existing Federal Regulation

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

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

## Proposed Federal Regulation

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

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

## Existing State Regulation

*An Alaska resident (the beneficiary) may obtain an authorization allowing another Alaska resident (the proxy) to hunt moose, caribou, or deer for them if they are blind, 70-percent physically disabled, 65 years of age or older, or are developmentally disabled. A person may not proxy for more than one beneficiary at a time.*

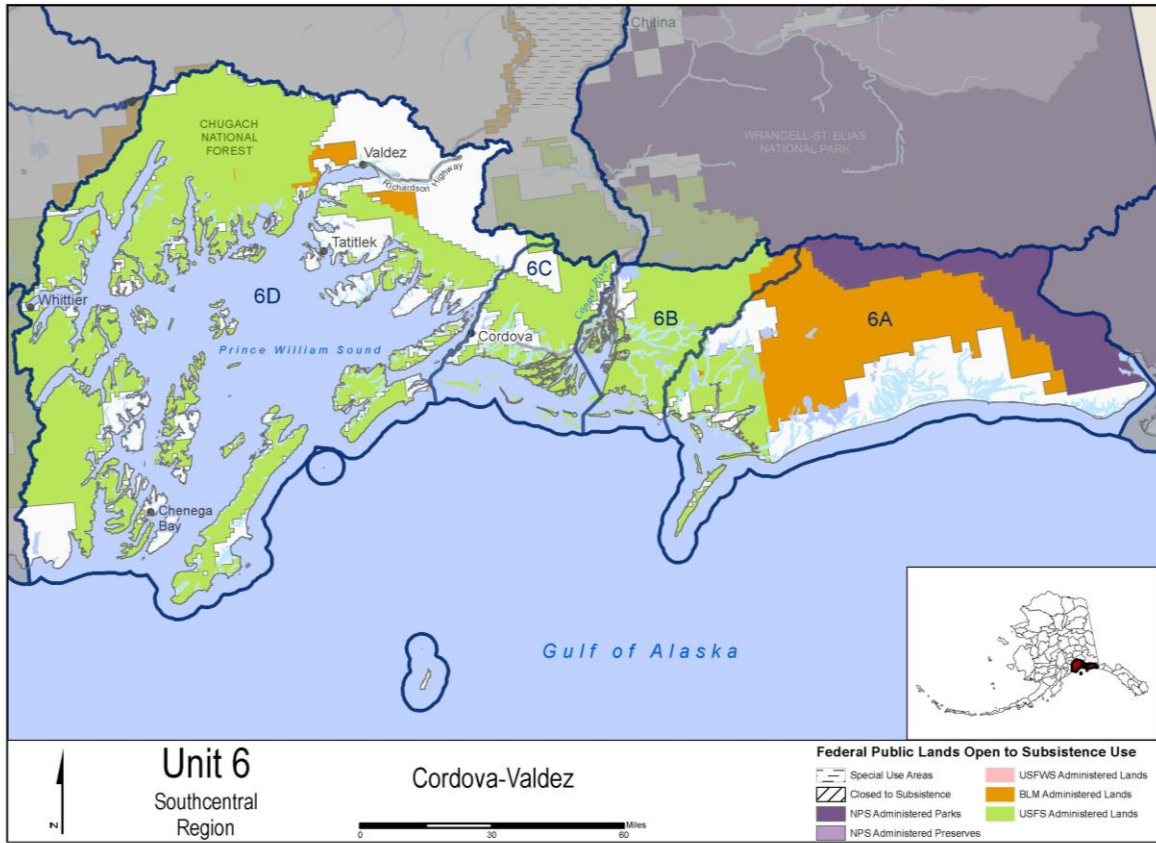
## Relevant Federal Regulation

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

*If you are a Federally qualified subsistence user (recipient), you may designate another Federally qualified subsistence user to take deer, moose, and caribou, and in Units 1-5, goats, on your behalf unless you are a member of a community operating under a community harvest system or unless unit-specific regulations in §100.26 preclude or modify the use of the designated hunter system or allow the harvest of additional species by a designated hunter. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time except for goats, where designated hunters may have no more than one harvest limit in possession at any one time, and unless otherwise specified in unit-specific regulations in §100.26.*

## Extent of Federal Public Lands

Federal public lands comprise approximately 71% of Unit 6 and consist of 49.2% U.S. Forest Service managed lands, 13.8% Bureau of Land Management managed lands, and 7.6% National Park Service managed lands (**Figure 1**).



**Figure 1.** Unit 6 hunt area

**Customary and Traditional Use Determinations**

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for deer in Unit 6; therefore, all rural residents of Alaska may harvest deer in Unit 6.

**Regulatory History**

Prior to 2002, there was no designated hunting provision for Unit 6. Three requests for a designated hunter provision in Unit 6 were submitted to the Federal Subsistence Board (Board) in 2002, including: Proposal WP03-15, which proposed that no designated hunter could be used for Unit 6C moose; Proposal WP03-16, which proposed a designated hunter could be used to harvest Unit 6C moose or deer; and Proposal WP03-55, which proposed a designated hunter could be used for any wildlife in Unit 6.

Proposal WP03-15 was submitted because it was thought by some residents that "the limited numbers of available permits continue to be highly coveted and that the drawing method of permit allocation was regarded as the most equitable and appropriate for local circumstances," and that designated hunting provisions can lead to abuses of the drawing system, such as those with large extended families or those willing to sponsor proxies as a way of increasing their chances of being drawn for a permit. The proponent went on to state that sharing is a fundamental part of life in

Cordova and "designated hunter privileges are simply not necessary to further the goals of sharing or resource distribution and serve only to confound the fairness of permit drawing and distribution." He also acknowledged that "proxy or designated hunter provisions are an appropriate and sometimes necessary accommodation in other hunt circumstances but not in the Unit 6(C) moose hunt where a very limited number of permits are available only by drawing."

The proponents of Proposals WP03-16 and WP03-55 expressed the opposite view. They supported designated hunter provisions in Unit 6. They expressed the view that a Federally qualified subsistence user should be allowed to have a designated hunter to harvest subsistence foods without being limited or restricted by physical disabilities. In Proposal WP03-16, the proponents stated that the two elderly successful drawing permit holders had used the State proxy hunting system in the past to obtain their subsistence fish and game. The Native Village of Eyak also pointed out that there are designated hunting provisions in neighboring Units 5, 11, and 13.

The proposal submitted by the Native Village of Eyak, WP03-55, is the only one of the three that placed the specific conditions on the designation to another Federally qualified subsistence user to be "in their family." In conversations with representatives of the proponent, this condition was requested as a way of recognizing traditional practices of their tribal organization. The application of designated hunting provisions to any wildlife was also seen as a way to recognize traditional practices, as the Native Village of Eyak Council members stated that when hunters go out, they hunt for whoever needs the resource and do not limit this practice to certain species (Lambert 2003).

These proposals were largely in response to the Federal subsistence moose drawing hunt in Unit 6C. After deliberation, the Board adopted the current designated hunting provision unique to Unit 6, allowing Federally qualified subsistence users who are blind, 65 years of age or older, 70% disabled, or temporarily disabled, to harvest any moose, deer, black bear, or beaver on their behalf in Unit 6, and goat in Unit 6D, unless the recipient is a member of a community harvest system. The resulting designated hunter provision adopted by the Board was a compromise, recognizing the coveted nature of draw permits for Unit 6C moose, and allowed for the designation of another hunter to harvest deer, moose, caribou, black bear, beaver and goats by hunters who are blind, over 65 years of age, 70% disabled, or temporarily disabled. The only designated hunter permits that have been issued since that time have been for Unit 6C moose.

In 2003, the Board adopted Wildlife Proposal WP03-02 with modification to standardize the designated hunter regulations. The Office of Subsistence Management (OSM) submitted the proposal to provide equal harvest opportunity for subsistence users across the State. Previously, designated hunter regulations had been adopted on a unit by unit basis resulting in certain hunts and units being overlooked. This proposal established a statewide designated hunter program for subsistence harvest of moose, deer and caribou, subject to unit-specific regulations.

### **Current Events**

Wildlife Proposal WP22-02, submitted by OSM, requests removing language from general and unit specific regulations prohibiting the use of a designated hunter if the recipient is a member of a community operating under a community harvest system.

## Cultural Knowledge and Traditional Practices

Designated hunting provisions provide recognition of the customary and traditional practices throughout the state. On a statewide basis, findings from a comparison of household harvests in a community documented that "it is not uncommon for about 30 percent of the households in a community to produce about 70 percent or more of the community's wild food harvest (Wolfe 1987: 16-17)." One of the factors proposed as an explanation for the highly productive households is the developmental cycle in multi-household kinship groups; where the mature household (higher producers) is characterized by the largest pool of labor and equipment and the largest set of social obligations to produce food. A conclusion of this study was that individual bag or harvest limits do not allow for these practices and a recommendation for alternative management tools, "such as the transferable bag and the community bag [limits], are identified as being more compatible with the customary harvest patterns of particular rural Alaskan areas" (Wolfe 1987: 17).

## Harvest History

Deer are an important subsistence resource for residents of Unit 6. A community survey in 2003 showed that deer were used by more households in Chenega Bay, Cordova, and Tatitlek than any other large mammal species, with a minimum of 65% of households estimated using deer in each community (**Table 1**). In addition, deer were the primary large mammal harvested by households in each community, whereas other large mammal resources were more likely shared from individuals within or outside of the communities (Fall 2006) (**Table 1**). A large proportion of the yearly take of deer by the residents of Cordova, the largest of the three communities, occurs on Hawkins Island, which is in relatively close proximity to town.

Prior to 2011, deer harvest in Unit 6 was estimated from harvest questionnaires mailed to a sample of hunters who were issued State harvest tickets. It was difficult to identify deer harvested by Federally qualified subsistence users, as results were categorized as residents of Unit 6 (local residents), residents outside of Unit 6 (nonlocal residents), and nonresidents (**Table 2**). Thus, the local and nonlocal resident categories included both Federally qualified subsistence users and non-Federally qualified subsistence users. However, beginning in 2011/2012, harvest reports were given to each user issued a State harvest ticket, improving reporting and connected each user to a community. The interim harvest report showed that approximately 45% of the reported resident harvest was by local Federally qualified subsistence users (residents of Cordova, Chenega Bay, Tatitlek, and Whittier), 50% by non-Federally qualified Alaska residents, and 5% by nonlocal Federally qualified subsistence users (ADF&G 2012). Approximately 98% of the reported harvest by local Federally qualified subsistence users was from Cordova residents (ADF&G 2012), which was similar to the results of the household survey conducted in 2003 (95% of reported harvest) (**Table 1**). The majority of harvest by non-Federally qualified subsistence users was from Anchorage residents (approximately 38% of reported harvest), and 5% of the reported harvest was associated with Valdez residents, which is a nonrural community in Unit 6 (ADF&G 2012). Local and nonlocal residents were the primary users (29% and 66% of the estimated hunters, respectively) and accounted for 39% and 59% of the estimated harvest between 2010/2011 and 2019/2020, respectively (**Table 2**). McLaughlin (2015) reported a decline in hunter success during the winter of 2014-2015.

This may be due in part to the relatively warm winter which allowed the deer to remain more dispersed at higher elevations where they are less available to Federally qualified subsistence users (Westing 2014). Local residents have the highest success rates of the deer hunters in Unit 6, averaging 1.6 deer per year between 2010/11 and 2019/20 (**Table 2**).

From 2006 to 2012, the sex ratio of the harvest was approximately 62% male and 38% female (Crowley 2011, Westing 2013). Harvest reports between 2005/2006 and 2009/2010 showed that most of the annual deer harvest occurred during October (19%–35%), November (25%–35%), and December (18%–24%) (Crowley 2011, Westing 2013). Few deer have been harvested during the extended January season since the season was lengthened in 2016. Harvest chronology is similar to previous years, as users often prefer hunting after snow has pushed deer to lower elevations and because the rut, which occurs in November, increases the harvest vulnerability of bucks (Crowley 2011, Westing 2013). Deer were primarily harvested by hunters using boats (76%–86%) as their primary transportation method (Crowley 2011, Westing 2013).

**Table 1.** Household harvest survey data from communities in Prince William Sound, Alaska in 2003. Households were classified as having used, attempted to harvest, or harvested resources if any member of that household participated in that category. The percentage of households that used a resource included those that harvested and gave it away or acquired the resource from another user, and included all non-commercial uses of the resource (Fall 2006).

Community	Species	Percentage (%) of households			Total animals harvested
		Used	Attempted	Harvested	
Chenega Bay	Deer	81	75	56	50
	Moose	44	6	6	1
	Goat	25	13	6	1
	Sheep	13	6	0	0
	Black bear	13	0	0	0
Cordova	Deer	65	44	39	1354
	Moose	51	14	12	111
	Goat	11	3	1	16
	Sheep	1	1	1	8
	Black bear	10	8	3	35
Tatitlek	Deer	100	56	28	30
	Moose	32	0	0	0
	Goat	40	12	4	1
	Sheep	4	0	0	0
	Black bear	20	8	4	1

**Table 2.** Unit 6 deer harvest 2010-2020 (Crowley 2012, pers. comm., Westing 2013, 2014, FWS 2015, Westing 2021, pers. comm.). Harvest data was recorded via the State's deer hunter questionnaire survey until 2010/2011 and via a harvest ticket starting in 2011/2012 (Westing 2021, pers. comm.).

Year	Local resident		Nonlocal resident		Nonresident		Total deer harvested
	Hunters	Deer harvested (deer/hunter)	Hunters	Deer harvested (deer/hunter)	Hunters	Deer harvested (deer/hunter)	
2010/2011	352	805(2.2)	775	778(1.0)	60	60(1.0)	1643
2011/2012	455	1202(2.6)	888	1426(1.6)	51	48(0.9)	2676
2012/2013	196	156(0.8)	606	367(0.6)	50	13(0.3)	536
2013/2014	212	228(1.1)	490	303(0.6)	41	3(0.1)	534
2014/2015	360	434(1.2)	793	858(1.1)	37	6(0.2)	1298
2015/2016	443	655(1.5)	936	977(1.0)	52	54(1.0)	1686
2016/2017	508	907(1.8)	1216	1601(1.3)	74	46(0.6)	2554
2017/2018	412	558(1.4)	943	849(1.3)	85	48(0.6)	1455
2018/2019	461	773(1.7)	888	916(1.0)	56	16(0.3)	1705
2019/2020	444	773(1.7)	1102	1319(1.2)	63	49(0.8)	2141

### Effects of the Proposal

Removal of deer from the Unit 6 designated hunting provision would allow any Federally qualified subsistence user to harvest deer in Unit 6 on the behalf of other qualified users. This would allow additional access to deer by families or individuals that are unable to hunt themselves, as Federal regulation allows for designated hunters in the remainder of Alaska for deer, moose, and caribou. Biological effects on the Unit 6 deer population would be minimal because winter severity has as great an effect on Prince William Sound deer populations as does hunting pressure. In-season management authority could be used to mitigate conservation concerns if they develop.

### OSM PRELIMINARY CONCLUSION

Support Proposal WP22–13.



## Justification

Allowing any Federally qualified subsistence user to designate another qualified user to harvest deer on their behalf in Unit 6 would provide additional access to deer for individuals and families unable to harvest deer themselves, whether as a result of physical limitations, lack of boat access, or other reasons. This would also make the Unit 6 designated hunter regulation more consistent with the statewide regulation for designated hunters.

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

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

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

**DRAFT STAFF ANALYSIS**  
**WP22-01**

**ISSUES**

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

**Discussion**

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

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

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

**Existing Federal Regulation**

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

*(c) Harvest limits*

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

*(e) Possession and transportation of wildlife.*

...

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

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

**Proposed Federal Regulation**

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

*(c) Harvest limits*

...

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

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

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

*(e) Possession and transportation of wildlife.*

...

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

**State of Alaska Regulations**

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

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

## Federal Public Lands

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

## Customary and Traditional Use Determination

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

## Regulatory History

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

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

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

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

- (1) The fish and wildlife is taken by an individual who is required to obtain and possess pertinent State harvest permits, tickets, or tags, or Federal permits, harvest tickets, or tags;*
- (2) A qualified subsistence user may designate another qualified subsistence user to take fish and wildlife on his or her behalf;*
- (3) The fish and wildlife is taken by individuals or community representatives permitted a one-time or annual harvest for special purposes including ceremonies and potlatches;*
- (4) The fish and wildlife is taken by representatives of a community permitted to do so in a manner consistent with the community's customary and traditional practices.*

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

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

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

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

*(c) Possession and transportation of wildlife*

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

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

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

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

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

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



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

*(c) Possession and transportation of wildlife*

...

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Effects of the Proposal**

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

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

## **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP22-01.

### **Justification**

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

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## APPENDIX 1

### STATE OF ALASKA COMMUNITY HARVEST PROGRAM

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*(i) In this section,*

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

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

<b>WP22-02 Executive Summary</b>	
<b>General Description</b>	Proposal WP22-02 requests to remove language from designated hunting regulations prohibiting the use of a designated hunter permit by a member of community operating under a community harvest system. <i>Submitted by the Office of Subsistence Management.</i>
<b>Proposed Regulation</b>	See page 460
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Bristol Bay Subsistence Regional Advisory Council Recommendation</b>	
<b>Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation</b>	
<b>Western Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	

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

## DRAFT STAFF ANALYSIS WP22-02

### ISSUES

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

### DISCUSSION

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

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

### Existing Federal Regulation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Proposed Federal Regulation**

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Existing State Regulation

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

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

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

## Federal Public Lands

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

## Customary and Traditional Use Determination

This is a statewide proposal regarding wildlife.

## Regulatory History

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

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

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

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

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

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

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

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

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

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

*(c) Possession and transportation of wildlife*

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

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

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

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

*(3) Individual bag limits (i) bag limits authorized by §\_\_\_\_.25 and in State regulations may not be accumulated; (ii) Wildlife taken by a designated hunter for another person pursuant to §\_\_\_\_6(f)(2) [above], counts toward the individual bag limit of the person for whom the wildlife is taken.*

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

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

*Unit 26(C)—3 sheep per year; the Aug. 10–Sept 20 season is restricted to 1 ram with 7/8 cur1 horn or larger. A State registration permit is required for the Oct. 1–Apr. 30 season, except for residents of the City of Kaktovik. Kaktovik residents may harvest sheep in accordance with a Federal community harvest strategy for Unit 26(C) which provides for the take of up to two bag limits of 3 sheep by designated hunter. Procedures for Federal permit issuance and community reporting will be mutually developed by Kaktovik and Federal representatives prior to the season opening. Open season: Aug. 10–Sept. 30 and Oct. 1–Apr. 30 (58 Fed. Reg. 103, 31289 [June 1, 1993]).*

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

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

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

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

*(c) Possession and transportation of wildlife*

...

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

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

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

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

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

*(e) Hunting by designated harvest permit*

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

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

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

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

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

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

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

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

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

## **Harvest History**

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

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

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

*Continued on next page.*



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

**Cultural Knowledge and Traditional Practices**

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

**Effects of the Proposal**

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

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

**OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP22-02.

**Justification**

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

## LITERATURE CITED

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

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

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

## APPENDIX 1

### STATE PROXY HUNTING REGULATIONS

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

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

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

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

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

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

*(4) signature of the issuing agent.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*(1) caribou;*

*(2) deer;*

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

*(4) emperor geese.*

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

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

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

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

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

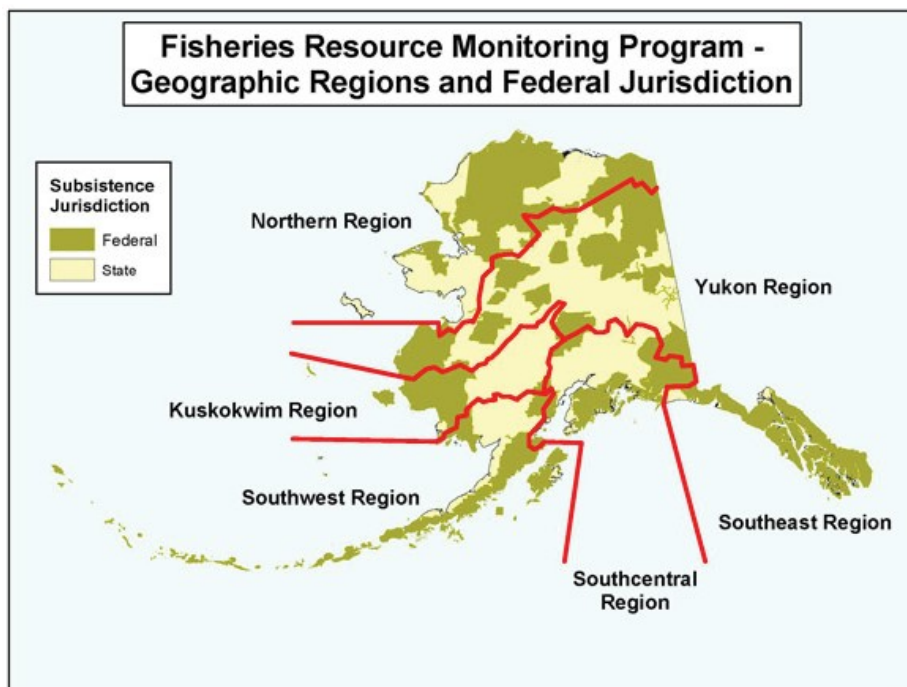
*(5) Unit 20(D), within the Delta Junction Management Area, the moose drawing hunt for qualified disabled veterans.*

## FISHERIES RESOURCE MONITORING PROGRAM

### BACKGROUND

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

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



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

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

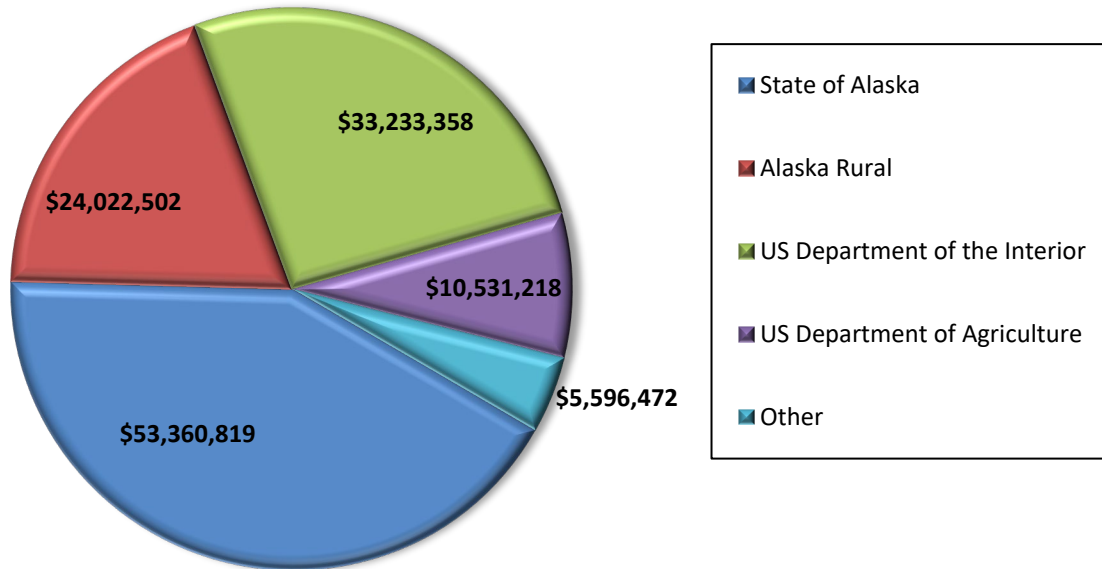
Project executive summaries are assembled into a draft 2022 Fisheries Resources Monitoring Plan. The draft plan is distributed for public review and comment through Subsistence Regional Advisory Council meetings, beginning in September 2021. The Federal Subsistence Board will review the draft plan and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

## **HISTORICAL OVERVIEW**

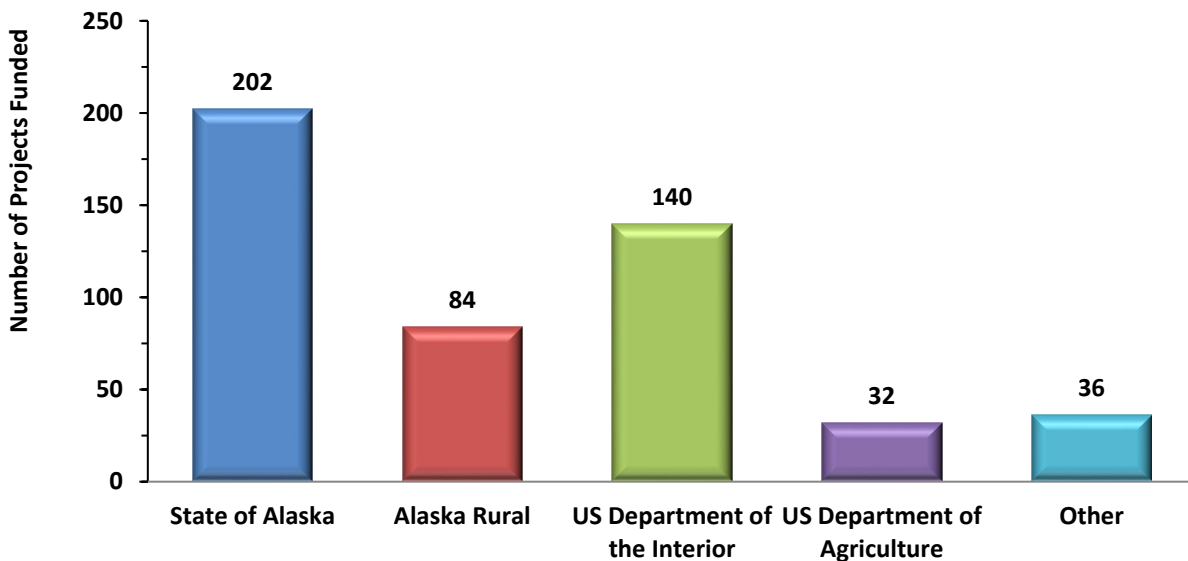
The Monitoring Program was first implemented in 2000 with an initial allocation of \$5 million. Since 2000, a total of \$127 million has been allocated for the Monitoring Program to fund a total of 494 projects (**Figure 1** and **Figure 2**).

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

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



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

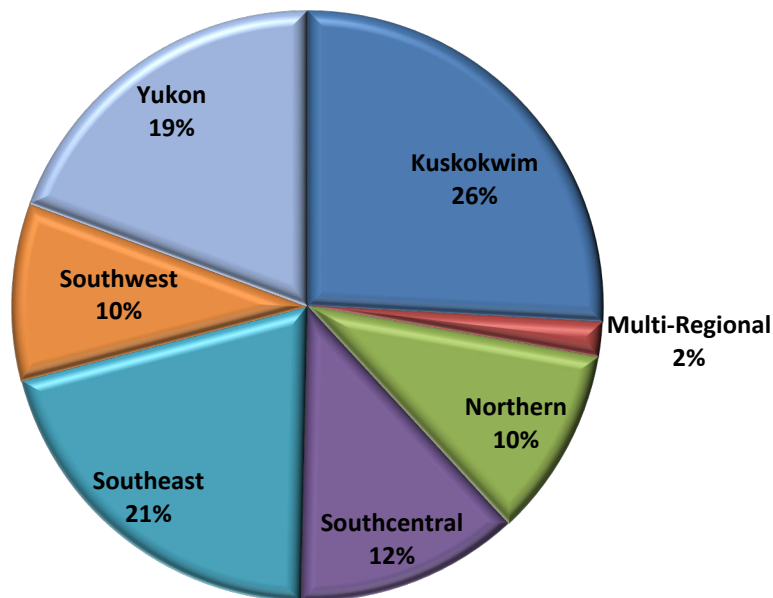




**Table 1.** Regional allocation guideline for Fisheries Resource Monitoring Program Funds.

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

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



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

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

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

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

## **PROJECT EVALUATION PROCESS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **POLICY AND FUNDING GUIDELINES**

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

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

Activities that are not eligible for funding include:

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

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

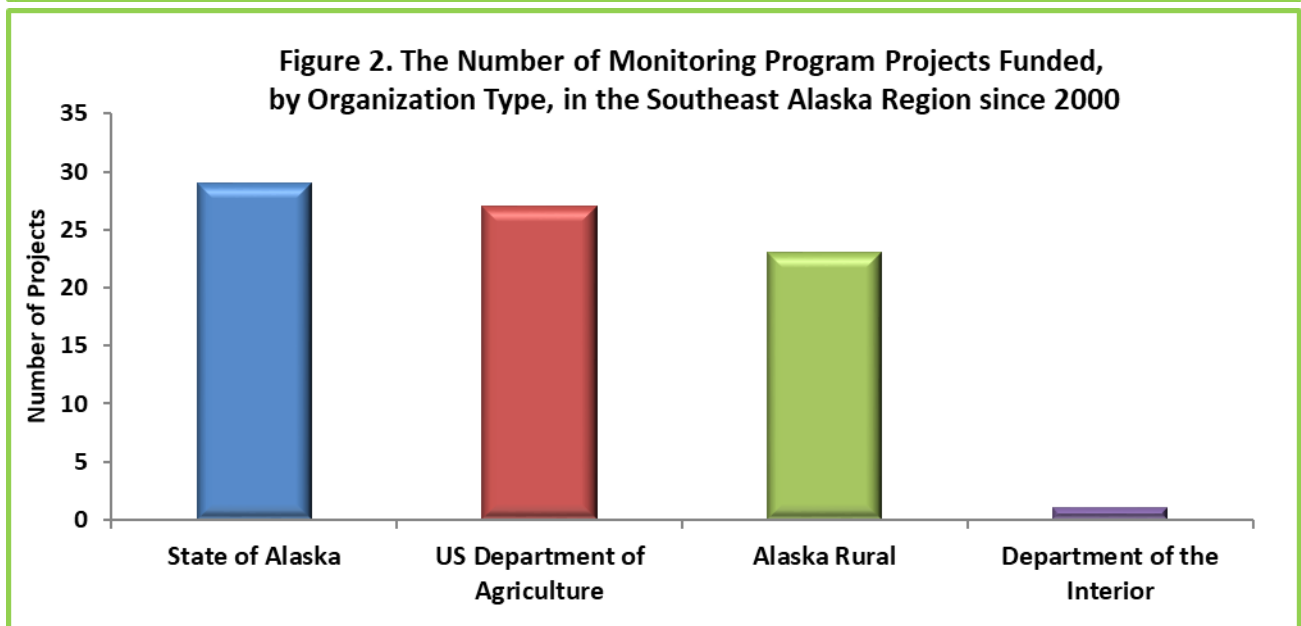
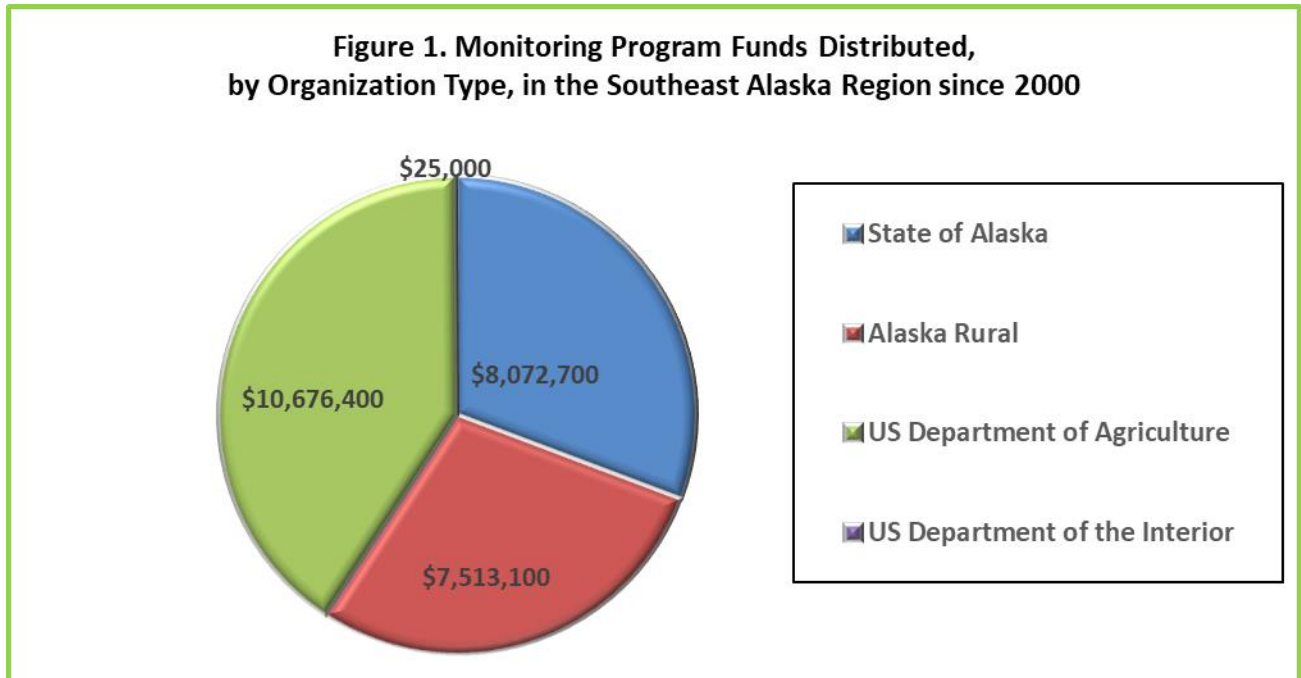
The Monitoring Program may fund assessments of key Federal subsistence fishery stocks in decline or that may decline due to climatological, environmental, habitat displacement, or other drivers; however, applicants must show how this knowledge would contribute to Federal subsistence fisheries management.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

## **2022 FISHERIES RESOURCE MONITORING PLAN**

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

## FISHERIES RESOURCE MONITORING PROGRAM SOUTHEAST ALASKA REGION OVERVIEW

Since the inception of the Monitoring Program in 2000, 79 projects have been undertaken in the Southeast Alaska Region costing 26.3 million (**Figure 1**). Of these, the State of Alaska received funds to conduct 29 projects, Alaska rural organizations conducted 23 projects, the U.S. Department of Agriculture conducted 27 projects, and the Department of the Interior conducted one project (**Figure 2**). See **Appendix 1** for more information on Southeast Alaska Region projects completed since 2000.



## **PRIORITY INFORMATION NEEDS**

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

- Reliable estimates of Sockeye Salmon escapement and in-season estimates of harvest and stream discharge information at the following systems: Kanalku, Klawock, Hetta, Falls Lake, Sarkar, Kook, Neva, Karta, Hatchery, Eek, Kah Sheets, Klag, Gut, Kutlaku, Salmon Bay, Sitkoh, Hoktaheen, Alecks Creek, Lake Eva and Lake Leo.
- Escapement indexes for Eulachon at the Unuk River and Yakutat Forelands.
- Population assessment for Eulachon for northern Southeast Alaska.
- Traditional ecological knowledge of how each community distributes harvest between Sockeye Salmon systems available to them.
- Reliable estimates of salmon populations and harvests in the sport and subsistence fisheries at Kah Sheets and Alecks Creek.
- Ethnographic study of the Yakutat subsistence salmon fishery.
- Reliable estimate of subsistence Sockeye harvest in the Klawock drainage.
- Development of escapement goals for sockeye systems with long term escapement data sets.
- Update community household fish harvest surveys.

## **AVAILABLE FUNDS**

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

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

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

For the 2022 Monitoring Program, 15 proposals were submitted for the Southeast Alaska Region. The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit (**Table 1**). These scores remain confidential. An executive summary for each proposal submitted to the 2022 Monitoring Program for the Southeast Alaska Region is in **Appendix 2**.



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

<b>Project Number</b>	<b>Title</b>	<b>Total Project Request</b>	<b>Average Annual Request</b>
22-600	Yakutat Eulachon at the Landscape and Local Scale	\$117,780	\$29,445
22-601	Stikine River Inseason Subsistence Salmon Harvest	\$178,311	\$44,577
22-602	Falls Lake Sockeye Salmon Stock and Subsistence Harvest Assessment	\$583,232	\$145,808
22-603	Gut Bay Sockeye Salmon Stock and Subsistence Harvest Assessment	\$589,997	\$147,499
22-604	Hetta Lake Sockeye Salmon Stock Assessment	\$641,518	\$160,379
22-605	Eva Lake Sockeye Salmon and Subsistence Harvest Assessment	\$609,971	\$152,492
22-607	Neva Lake Sockeye Salmon Stock Assessment	\$487,401	\$121,850
22-608	Kanalku Lake Sockeye Salmon Stock Assessment	\$195,047	\$48,761
22-609	Sitkoh Lake Sockeye Salmon Stock Assessment	\$362,742	\$90,685
22-610	Klag Lake Sockeye Salmon Stock Assessment	\$758,511	\$189,627
22-611	Sockeye Salmon Quantitative DNA (eDNA) Stock Monitoring	\$216,959	\$54,239
22-612	Northern Southeast Alaska Eulachon Population Dynamics Monitoring	\$840,523	\$210,130
22-613	Unuk River Eulachon Population Assessment	\$185,356	\$46,339
22-650	Updating Icy Straight Community Household Subsistence Harvest Surveys and Documenting Subsistence Harvest Patterns	\$377,961	\$125,987
22-651	Estimating Inseason Harvests of Klawock River Salmon Subsistence Fishery	\$177,667	\$44,416
<b>Total</b>		<b>\$6,322,976</b>	<b>\$1,580,737</b>

**TECHNICAL REVIEW COMMITTEE JUSTIFICATION FOR PROPOSAL SCORES****Project Number:** 22-600**Project Title:** Yakutat Eulachon at the landscape and local scale

**Technical Review Committee Justification:** This project addresses the Council's Priority Information Need identified in the 2022 Notice of Funding Opportunity. Investigators will assess Eulachon stocks occurring in the Yakutat Forelands using a variety of methods including aerial, foot, and float surveys, and eDNA sampling. This project will incorporate an eDNA component that may allow investigators to relate eDNA of Eulachon to visual abundance estimates obtained through float surveys in the Situk River, the main Eulachon fishery for Federally qualified subsistence users of the Yakutat community. This project will provide updated baseline Eulachon stock assessment information for the Yakutat Forelands.

Assessment of the species in the Yakutat Forelands is both timely and important. On March 18, 2010 the southern distinct population segment of Eulachon was listed as threatened under the U.S Endangered Species Act. Given observed trends in Eulachon declines elsewhere in Alaska, this work has wide geographic management implications. The methods proposed for completion of the stated objectives use proven science and logistics. The co-investigator includes the Tribal organization in the community that traditionally uses Eulachon. The project builds capacity within the Yakutat Tlingit Tribe with the expectation that fieldwork will transition to the Tribal organization, with the U.S. Forest Service retaining project oversight, aerial surveys, and reporting responsibilities. This project would continue and enhance the meaningful role that local residents play in management of local Monitoring Fund projects. The costs of the project are realistic and in line with similar projects in the area.

**Project Number:** 22-601

**Project Title:** Stikine River Inseason Subsistence Salmon Harvest

**Technical Review Committee Justification:** This project does not address a Priority Information Need identified in the 2022 Notice of Funding Opportunity but does provide some justification for the need for this research. Salmon subsistence harvests within the Alaska portion of the Stikine River drainage primarily occurs within the Tongass National Forest. The Federal nexus is clear. Aspects of the Project Design could be more clearly stated. The project represents a partnership between the U.S. Forest Service and Wrangell Cooperative Association. The addition of social science expertise and methodology and more commitment to training and oversight of field staff would strengthen the project. The budget is reasonable for the work planned. One letter of support was provided.

**Project Number:** 22-602

**Project Title:** Falls Lake Subsistence Sockeye Salmon Stock and Harvest Assessment

**Technical Review Committee Justification:** This project addresses the Council's Priority Information Need identified in the 2022 Notice of Funding Opportunity. The project proposes to collect Sockeye Salmon age, sex, and length data, estimate the subsistence harvest of Sockeye Salmon from the system, and use mark-recapture with a video net weir to estimate the escapement into Falls Lake. Falls Lake is the primary Sockeye Salmon stock used by residents of Kake. In previous years of the study, investigators found that returns to the terminal area are highly variable, and that a substantial portion of the run can be harvested in the subsistence fishery. The methods proposed have been used successfully on this project for a number of years, and the investigators have a track record of successfully meeting the project's objectives. The mark-recapture component would provide for validated weir counts and scale

sample sizes should provide enough samples to meet precision goals. Harvest monitoring will provide a much better estimate of harvest than permit data. The investigators includes the Tribal organization in the community that traditionally uses Falls Lake Sockeye Salmon and the project would continue and enhance the meaningful role that local residents play in management of local Monitoring Program projects. The costs of the project are realistic and in line with similar projects in the area.

**Project Number:** 22-603

**Project Title:** Gut Bay Subsistence Sockeye Salmon Stock and Harvest Assessment

**Technical Review Committee Justification:** This project addresses the Council's Priority Information Need identified in the 2022 Notice of Funding Opportunity. The project proposes to collect baseline information on run timing, strength, and stock characteristics of Sockeye Salmon returns to Gut Bay, in the Southern Baranof Wilderness Area of Baranof Island. The project's objectives are clear, measurable, and achievable. Two weirs and mark-recapture techniques will be used in this project design. The methodology will provide a minimum escapement number from video counts, which may be validated by the mark-recapture estimate. Subsistence harvest will be estimated using an onsite interview survey of subsistence fishers. Stream temperature and discharge will be determined following standard protocols. The investigators include the local village organization, and the project would continue and enhance the meaningful role that local residents play in management of local Monitoring Program projects. The project costs are realistic and commensurate with similar projects in the region.

**Project Number:** 22-604

**Project Title:** Hetta Lake Subsistence Sockeye Salmon Stock Assessment Project

**Technical Review Committee Justification:** This project addresses the Council's Priority Information Need identified in the 2022 Notice of Funding Opportunity. This project proposes to continue assessment of Sockeye Salmon returns to Hetta Lake on Prince of Wales Island. Sockeye Salmon escapement and harvest data collected from Hetta Lake has been useful in documenting trends and aiding in-season management. The investigation plan for this project has not changed substantially from past Monitoring Program funding cycles and aside from a few suggestions, the objectives and methods are clear measurable, and achievable. The investigators have a good record of satisfactorily completing multiple Monitoring Program projects and timely completion of deliverables and products. The project would continue and enhance the meaningful role that Hydaburg residents play in management of local Monitoring Program projects. The principal investigator is a local Alaska Native resident of Hydaburg and is the acting tribal administrator for the Hydaburg Cooperative Association. He is responsible for overseeing the entire project with technical assistance from the co-investigator. Local residents will be hired to run the field portion of the project. Technical capacity will be built through training local residents while sampling capacity will be built through project equipment purchases, replacement and upkeep. The budget is above average for similar projects in Southeast Alaska but reasonable considering the work to be completed and products delivered. Letters of support from the Organized Village of Kasaan, Alaska Department of Fish and Game, and the U.S. Forest Service are included for this project.

**Project Number:** 22-605

**Project Title:** Lake Eva Subsistence Sockeye Salmon Stock and Harvest Assessment

**Technical Review Committee Justification:** This project addresses the Council’s Priority Information Need identified in the 2022 Notice of Funding Opportunity. This project proposes to use a mark-recapture study and a picket weir to estimate the escapement of Sockeye Salmon into Lake Eva; collect age-sex-length data; estimate stream discharge, and estimate the subsistence harvest of Sockeye Salmon from the system. This is a primary stock used by residents of Angoon, but also by residents of Sitka and Juneau. There is no history of Monitoring Program funded projects occurring at this location. The methods proposed have been used successfully with other Monitoring Program funded projects in Southeast Alaska, and the investigators have a track record of successfully meeting project objectives. The mark-recapture component would provide for a validated weir count, which is ideal, but using swim-through redundant video weirs would likely be more fish-friendly without compromising data integrity. Throughout Year 1 of the project, investigators will reconnaissance the area to assess feasibility of installing a video net weir during all subsequent years of the funding cycle. The investigators include the local village organization, and the project would continue and enhance the meaningful role that local residents play in management of local Monitoring Fund projects. The Angoon Community Association is a partner on this project.

**Project Number:** 22-607

**Project Title:** Neva Lake Sockeye Salmon Stock Assessment

**Technical Review Committee Justification:** This project addresses the Council’s Priority Information Need identified in the 2022 Notice of Funding Opportunity. The Neva Lake Sockeye Salmon stock assessment is a cooperative project between the U.S. Forest Service and the Hoonah Indian Association which has been funded through the Monitoring Program since 2002. The community of Hoonah is a co-investigator and has direct dependence on Neva Lake for their subsistence Sockeye Salmon needs. Information from the first few years of the project led to higher subsistence harvest limits. Subsequent information generated by the project led to harvest limits being lowered in response to decreasing annual escapements coupled with increasing subsistence effort. This project would provide additional annual escapement counts and biological information about the population that is useful for management of the fishery. The objectives are clear, measurable, and achievable and the investigators have a proven ability to complete Monitoring Program projects on time with satisfactory deliverables. The Hoonah Indian Association would continue and enhance their meaningful role in accomplishing the objectives of this project and several local fisheries technicians would be employed.

**Project Number:** 22-608

**Project Title:** Kanalku Lake Sockeye Salmon Stock Assessment

**Technical Review Committee Justification:** This project addresses the Council’s Priority Information Need identified in the 2022 Notice of Funding Opportunity. The project will reinstate monitoring of Kanalku Lake Sockeye Salmon, Angoon’s preferred source for Sockeye Salmon. This project will use mark-recapture to estimate the escapement of Sockeye Salmon into Kanalku Lake; collect age, sex, length data; and estimate discharge and temperature of the Kanalku Lake outlet stream. The investigators include the local village organization, the Angoon Community Association, and the project would continue and enhance the meaningful role that local residents play in management of local Monitoring

Fund projects. The Angoon Community Association provided a letter of support for this project. The costs of the project are realistic.

**Project Number:** 22-609

**Project Title:** Sitkoh Lake Sockeye Salmon Stock Escapement

**Technical Review Committee Justification:** This project addresses the Council's Priority Information Need identified in the 2022 Notice of Funding Opportunity. This would be a continuation of a project funded in some form through the Monitoring Program from 2001-2006 and since 2010. The investigation plan for this project has not changed substantially from past Monitoring Program funding cycles. The investigators have a good record of completing Monitoring Program projects and submitting timely deliverables. The co-investigator is a local community organization responsible for contract administration and overseeing the field component of the project with technical assistance from U.S. Forest Service partners. Local residents will be hired and receive training from U.S. Forest Service staff on project implementation and safety. The budget is reasonable considering the work to be completed and products delivered. The Angoon Community Association is a partner on this project and provided a letter of support.

**Project Number:** 22-610

**Project Title:** Klag Lake Sockeye Salmon Stock Assessment

**Technical Review Committee Justification:** This project addresses the Council's Priority Information Need identified in the 2022 Notice of Funding Opportunity. The Sitka Tribe of Alaska is the sole investigator for this project. This project has been funded through the Monitoring Program since 2001 and has provided valuable information for the management of the resource. The objectives and methods outlined in the investigation plan are clear, measurable and achievable and have been used successfully at other Monitoring Program projects. Local Natives will be targeted to fill seasonal fisheries technician positions. Four letters of support were provided for this project.

**Project Number:** 22-611

**Project Title:** Tongass National Forest Sockeye Salmon Quantitative eDNA Stock Monitoring

**Technical Review Committee Justification:** This project does not address a Priority Information Need identified by the Council. However, if proven successful, this technique may provide a less labor intensive and more cost-effective method for determining reliable estimates of Sockeye Salmon escapement. This project will use environmental DNA (eDNA) to assess the relationship between known estimates of Sockeye Salmon and eDNA concentrations as a means to gather escapement trends on a greater number of systems across the forest. The sole investigator agency is the U.S. Forest Service although fieldwork will be completed by local hires through other Monitoring Program funded weir projects at Falls Lake, Hetta Lake and Gut Bay. The project is designed to develop the capacity of existing partners to conduct eDNA sampling and provide resource managers the ability to monitor Sockeye Salmon escapement in systems without current monitoring projects in place.

**Project Number:** 22-612

**Project Title:** Northern Southeast Alaska Eulachon Population Dynamics Monitoring

**Technical Review Committee Justification:** The goal of this proposal is to develop a monitoring strategy for Eulachon populations in northern Southeast Alaska. The Southeast Subsistence Regional Advisory Council identified that a *population assessment for Eulachon for northern Southeast Alaska* is a Priority Information Need. The spawning biomass of Eulachon will be assessed using both mark-recapture methods and quantitative eDNA in the Chilkoot River, and eDNA alone at ten other locations in the Lynn Canal area. The use of quantitative eDNA to assess fish abundance is an emerging science, but the project partners have been using it for several years with some encouraging results. The plan would be improved by addition of a mechanism to calibrate the eDNA results at the other 10 sites. The project partners include a number of tribal agencies, non-profit agencies, a university and the development of capacity in those agencies is a goal of the project. The expenses for the project are considerable, due to its ambitious scope. If the use of eDNA proves to be an effective way to monitor Eulachon populations, it could provide future advancement that could be used at other locations, and greatly improve the cost effectiveness of future monitoring efforts.

**Project Number:** 22-613

**Project Title:** Unuk River Eulachon Population Assessment

**Technical Review Committee Justification:** This project addresses the Council's Priority Information Need identified in the 2022 Notice of Funding Opportunity. Returns and harvest of Unuk River Eulachon have declined severely since 1999. The Eulachon commercial fishery was closed in 2001, and from 2004-2010, virtually no Eulachon returned to the Unuk River. The Federal fishery has been closed pre-season by the Federal in-season managers annually since 2006. This project would use a combination of aerial surveys, video surveillance, and foot, boat, and field surveys to provide a qualitative index and biomass estimate of Eulachon returning to the Unuk River. In the event of an opener, Eulachon harvest and effort will be sampled during open Eulachon seasons in the Unuk River. This project develops partnerships and builds capacity with multiple agencies and groups including the U.S. Forest Service, Ketchikan Indian Community, Alaska Department of Fish and Game, the Organized Village of Saxman and the Metlakatla Indian Community.

**Project Number:** 22-650

**Project Title:** Providing updated community harvest information and documenting subsistence harvest patterns in three northern Southeast Alaska communities.

**Technical Review Committee Justification:** The proposed research addresses a Priority Information Need in the 2022 Notice of Funding Opportunity. In 2019, the Federal Subsistence Board closed the Neva Lake system, used by residents of Gustavus, to non-Federally qualified users due to low salmon abundance resulting in reduced harvest limits. The proposed project will investigate this fishery. While the salmon fishery occurs mostly in marine waters outside of Federal jurisdiction, salmon are migrating to natal streams within the Tongass National Forest. This project will enable evaluating reliability and validity of harvest monitoring methods used to estimate salmon harvest by the Alaska Department of Fish Game. The investigator will study the harvest and use of all wild resources, including fish. This allows the investigation of fish use within the context of overall wild resource uses and can provide valuable information to management but also increases the budget by adding data collecting and analysis of resources not part of the Priority Information Need, which was to update information on harvest and use of fish.

**Project Number:** 22-651

**Project Title:** Estimating inseason harvests of the Klawock River subsistence salmon fishery

**Technical Review Committee Justification:** This project addresses a priority information need identified in the 2022 Notice of Funding Opportunity. Objectives are clearly stated, and the investigation plan is well-written. Investigators seek to evaluate the recent change in State subsistence permit system to an online delivery and harvest reporting system. More in-depth discussion of methods would strengthen the merit of this project. The project is a partnership between Division of Subsistence and Klawock Heenya Corporation; however, the Corporation does not appear to have a significant role in the project. Two letters of support were provided.

**APPENDIX 1**  
**PROJECTS FUNDED IN THE SOUTHEAST ALASKA REGION SINCE 2000**

Project Number	Project Title	Investigators
<b><i>Estimation of Sockeye Salmon Escapement</i></b>		
00-043	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
00-044	Falls Lake Sockeye Salmon Stock Assessment	ADF&G, OVK
01-125	Gut Bay, Kook, and Hoktaheen L Sockeye Salmon Escapement Index	ADF&G, OVK
01-126	Kanalku, Hasselborg, and Sitkoh Lakes Sockeye Stock Assessment	ADF&G
01-127	Thoms, Salmon Bay, Luck Lakes Sockeye Salmon Escapement Index	ADF&G, WCA
01-128	Klag Bay Sockeye Salmon Stock Assessment	ADF&G, STA, USFS
01-130	Hetta Lake Sockeye Salmon Stock Assessment	ADF&G, HCA
01-175	Salmon Lake Sockeye and Coho Salmon Stock Assessment	ADF&G, STA, NSRAA, USFS
01-179	Virginia Lake Sockeye Salmon Assessment	USFS
02-012	Neva and Pavlof Sockeye Salmon Stock Assessment	USFS, HIA
02-017	Redfish Bay Sockeye Salmon Stock Assessment	STA, ADF&G, USFS
03-007	Eek Lake Sockeye Salmon Stock Assessment	HCA, ADF&G
04-604	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
04-605	Kanalku & Sitkoh Lakes Sockeye Salmon Stock Assessment	ADF&G, ACA
04-606	Hetta Lake Sockeye Salmon Stock Assessments	ADF&G, HCA
04-607	Falls, Gut, & Katlaku Subsistence Sockeye Stock Assessment	ADF&G, ACA
04-608	Salmon Lake Sockeye Salmon Stock Assessment	STA

<b>Project Number</b>	<b>Project Title</b>	<b>Investigators</b>
04-609	Klag Bay Sockeye Salmon Assessment	STA, ADF&G, USFS
05-601	Kook Lake Sockeye Salmon Assessment	ADF&G, ACA, USFS
05-603	Klawock Lake Sockeye Salmon Assessment	ADF&G, USFS
06-601	Neva Lake Sockeye Salmon Assessment	USFS
06-602	Katlaku Lake Sockeye Salmon Assessment	ADF&G, OVK
07-601	Hatchery Creek Sockeye Salmon Assessment	OVK, USFS
07-606	Hetta Lake Sockeye Salmon Assessment	ADF&G
07-607	Kanalku Lake Sockeye Salmon Assessment	ADF&G, ACA
07-608	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
07-609	Falls Lake Sockeye Salmon Assessment	ADF&G, OVK
08-600	Karta River Sockeye Salmon Assessment	OVKa, ADF&G, USFS, BIA
10-600	Karta River Sockeye Salmon Assessment	OVKa, BIA, USFS, ADF&G
10-601	Hatchery Creek Sockeye Salmon Assessment	USFS, OVKa, BIA
10-604	Klag Lake Sockeye Salmon Assessment	STA, USFS
10-605	Sitkoh Lake Sockeye Salmon Assessment	USFS, ACA, ADF&G
10-606	Hetta Lake Sockeye Salmon Assessment	HCA, KECS
10-607	Kanalku Lake Sockeye Salmon Assessment	ADF&G, ACA
10-609	Falls Lake Sockeye Salmon Assessment	USFS, OVK
10-610	Kook Lake Sockeye Salmon Assessment	USFS, ACA
10-611	Redoubt Lake Sockeye Salmon Assessment	USFS, ADF&G
10-612	Neva Lake Sockeye Salmon Assessment	USFS, HIA
14-601	Redoubt Lake Sockeye Salmon Assessment	USFS, ADF&G
14-602	Falls Lake Subsistence Salmon Stock & Harvest Assessment	USFS, OVK
14-603	Hetta Lake Sockeye Salmon Assessment	HCA, KECS
14-605	Hatchery Creek Sockeye Salmon Assessment	USFS, OVKa
14-606	Klawock Lake Sockeye Salmon Assessment	USFA, KCA, POWHA
14-608	Kanalku Lake Subsistence Sockeye Salmon Assessment	ADF&G, ACA, USFS
14-609	Klag Lake Sockeye Salmon Stock Assessment	STA
14-610	Kook Lake Sockeye Salmon Stock Assessment	USFS, ACA
14-611	Sitkoh Lake Sockeye Salmon Stock Assessment	USFS, ACA
14-612	Neva Lake Sockeye Salmon Stock Assessment	USFS, HIA
16-604	Eek Lake Sockeye Salmon Stock Assessment	USFS, HIA
18-602	Falls Lake Sockeye Salmon Stock Assessment	USFS, OVK
18-603	Gut Bay Sockeye Salmon Stock Assessment	USFS, OVK
18-604	Hetta Lake Sockeye Salmon Stock Assessment	HCA, KECS



Project Number	Project Title	Investigators
18-607	Neva Lake Sockeye Salmon Stock Assessment	USFS, HIA, ADF&G
18-609	Sitkoh Lake Sockeye Salmon Stock Assessment	USFS, ACA, ADF&G
18-610	Klag Lake Sockeye Salmon Stock Assessment	STA
20-600	Eek/Kasook Lakes Sub. Sockeye Salmon Stock Assessment	HCA
<b>Documentation of Subsistence Use Patterns for Salmon</b>		
00-015	SE Alaska Subsistence Fisheries Database Development	ADF&G
00-045	SE Tribes Traditional Subsistence Territory Mapping	USFS, OVK, ACA, HIA
01-091	East Alsek River Salmon Historical Use and TEK	YTT
01-103	SE Subsistence Fisheries GIS Database	ADF&G
01-104	Kake Sockeye Salmon Subsistence Harvest Use Pattern	ADF&G, OVK
02-038	SE Subsistence Fisheries GIS Database Development	ADF&G, CCTHITA, TST
02-049	Wrangell Salmon Subsistence Harvest Use Patterns	ADF&G, WCA, USFS
02-104	Hoonah and Klawock Salmon Survey	ADF&G, CCTHITA, TST
03-651	Klawock River Subsistence Steelhead Harvest & Use Patterns	ADF&G
04-651	SE Alaska Salmon TEK and Subsistence Monitoring	STA, ADF&G
04-652	Subsistence TEK Database	ADF&G, STA
06-651	Southeast Alaska Survey of Customary Trade	CCTHITA
07-651	Hydaburg Sockeye Salmon Customary & Traditional System	HCA, UAA
08-615	Maknahti Island Subsistence Herring Fishery Assessment	STA, PSU
<b>Prince of Wales Island Steelhead</b>		
01-105	POW Island Steelhead/Rainbow Trout Harvest Use Patterns	ADF&G
05-604	Prince of Wales Steelhead Assessment	ADF&G, OVK
08-650	POW Island Steelhead Trout Subsistence Harvest Survey	OVKa, HCA, BIA, USFS
<b>Estimation of Non-salmon Species</b>		
07-610	Behm Canal Eulachon Genetics	USFWS
08-607	Unuk River Eulachon	USFS
10-603	Yakutat Eulachon Surveys	USFS, YSB, ADF&G
14-607	Unuk River Eulachon	USFS

Abbreviations: **ACA** = Angoon Community Association, **ADF&G** = Alaska Department of Fish and Game, **BIA** = Bureau of Indian Affairs, **CCTHITA** = Central Council of Tlingit & Haida Indian Tribes of Alaska, **HCA** = Hydaburg Cooperative Association, **HIA** = Hoonah Indian Association, **KCA** = Klawock Cooperative Association, **KECS** = Kai Environmental Consulting Services, **NSRAA** = Northern Southeast Aquaculture Association, **OVK** = Organized Village of Kake, **OVKa** = Organized Village of Kasaan, **POWHA** = Prince of Wales Hatchery Association, **PSU** = Portland State University, **STA** = Sitka Tribe of Alaska, **TST** = Third Sector Technologies, **UAA** = University of Alaska Anchorage, **USFS** = USDA Forest Service, **USFWS** = USDOJ Fish and Wildlife Service, **WCA** = Wrangell Cooperative Association, **YSB** = Yakutat Salmon Board, and **YTT** = Yakutat Tlingit Tribe.

**APPENDIX 2  
EXECUTIVE SUMMARIES**

The following executive summaries were written by principal investigators and were submitted to the Office of Subsistence Management as part of proposal packages. They may not reflect the opinions of the Office of Subsistence Management or the Technical Review Committee. Executive summaries may have been altered for length.

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<b>Project Number:</b>	22-600			
<b>Title:</b>	Yakutat Eulachon at the landscape and local scale			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Susan Oehlers, USDA Forest Service Nathaniel Catterson , USDA Forest Service (USFS)			
<b>Co-investigator:</b>	Havaleh Rohloff, Yakutat Tlingit Tribe (YTT)			
<b>Project Cost:</b>	<b>2022:</b> \$21,916	<b>2023:</b> \$30,475	<b>2024:</b> \$31,474	<b>2025:</b> \$33,915
<b>Total Cost:</b>	\$117,780			

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**Issue Addressed:** Eulachon (*Thaelichthys pacificus*), an anadromous smelt, are an important subsistence resource for rural residents of the southeast Alaska. Many Eulachon stocks in the southern part of their range have declined significantly. Some stocks in southeast Alaska have exhibited this trend in recent years.

Historically, little was documented about Eulachon along the Yakutat Forelands. More recently, however, a 2010-2013 Fisheries Resource Monitoring Program (FRMP) funded study (10-603) documented baseline information on the consistency, timing, and relative abundance of spawning along major river systems on the Yakutat Forelands, indicating the significance of the Forelands as Eulachon spawning habitat. Observations from local subsistence users indicate a potential decline in recent years.

**Goal and Objectives:** The goal of this project is to provide updated baseline stock assessment for Eulachon on the Yakutat Forelands. This project will improve our understanding of the status of these stocks in order to maximize subsistence opportunity for Federally qualified subsistence users in Yakutat, as well as build fisheries monitoring and management capacity at the Yakutat Tlingit Tribe (YTT). This goal will be achieved through the following objectives:

Objective 1: Compare the current status of Eulachon stocks on the Yakutat Forelands to observations compiled during a previous survey effort (2010-2013).

Objective 2: Verify aerial presence/absence observations with on the ground sampling.

Objective 3: Document Eulachon abundance in the lower Situk River.

Objective 4: Evaluate Environmental DNA (eDNA) sampling as a method to quantify Eulachon abundance in the Situk-Ahrnklin System.

Objective 5: Document harvest and harvest methods and compile local Eulachon observations.

**Partnership and Capacity Building:** Developing conservation concerns about local salmon stocks have highlighted the need for building fisheries monitoring and management capacity at the Yakutat Tlingit Tribe (YTT). This effort began in 2020 with the recruitment of a Tribal fisheries biologist under the USFWS Partners in Fisheries Monitoring grant

In addition to collecting important information about a significant set of Eulachon stocks, this project will give Tribal personnel hands-on exposure to variety of fisheries techniques: aerial survey, float survey, beach seining, harvest interviews, and eDNA sampling. This experience will build capacity for YTT to design additional monitoring projects and better evaluate agency studies and management decisions. Developing indigenous management capacity will help the community remain resilient in the face of challenges like climate change and shifting agency initiatives or personnel.

**Anticipated outcomes:** This project will build on information collected during the previous FRMP funded project to provide updated baseline stock assessment information for the Yakutat Forelands. The project will compare the status of Eulachon stocks across the Forelands to the previous study, and gather information about Eulachon abundance and harvest in the Situk River subsistence fishery. This information is needed to better understand the status of these stocks to maximize subsistence opportunity for Federally qualified subsistence users in Yakutat.

The funding request in this proposal represents a framework on which additional projects can be built. The eDNA methods described here will be coordinated with ongoing and planned studies by the Chilkoot Indian Association. The long-term goal is not only to evaluate local eulachon stocks, but to build regional capacity to monitor eulachon using repeatable quantitative methods.

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<b>Project Number:</b>	22-601			
<b>Title:</b>	In-Season Harvest Monitoring of the Stikine River Federal Subsistence Salmon Fishery			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Harvest Monitoring, Traditional Ecological Knowledge			
<b>Principal Investigator:</b>	Robert Cross, USDA Forest Service, Tongass National Forest			
<b>Co-investigators:</b>	Esther Ashton, Wrangell Cooperative Association (WCA)			
<b>Project Cost:</b>	<b>2022:</b> \$67,786	<b>2023:</b> \$35,948	<b>2024:</b> \$36,834	<b>2025:</b> \$37,743
<b>Total Cost:</b>	\$178,311			

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**Issue:** The Stikine River Federal subsistence fishery provides an important source of salmon for the residents of Petersburg and Wrangell. The Federal subsistence Sockeye Salmon fishery was established in 2004 with an average annual harvest of 1,226 fish. All U.S. fisheries share an allowable catch dictated by the U.S.-Canada Pacific Salmon Treaty and the Transboundary River Panel. However, Stikine River Sockeye Salmon escapement and harvest has been decreasing since a peak in 2016. Recent low returns of Chinook and Sockeye Salmon have resulted in pre-season and in-season closures, respectively. Standardized in-season harvest monitoring is necessary to inform State and Federal fisheries management. Without standardized estimates of harvest and effort, managers will be forced to manage the fishery more conservatively, which could result in lost harvest opportunity for users.

**Objectives:**

1. Conduct weekly on-site subsistence fishery surveys recording number and location of active fishing nets and, when present, collecting harvest and fishing effort data from harvesters;
2. Sample 10 percent of participating households through phone surveys during each week of the Chinook and Sockeye Salmon fishery recording current harvest, effort, and qualitative assessments of their progress toward achieving their annual subsistence needs for salmon;
3. Test the efficacy of in-season harvest and fishing effort monitoring by comparing cumulative weekly estimated harvest to the post season total harvest reported on subsistence salmon permits;
4. Build capacity of Wrangell Cooperative Association to participate in fisheries management.

**Methods:**

*Objective 1:* Weekly estimates of salmon harvest and effort will be calculated using net count surveys and harvester interviews. During the salmon season, the crew will conduct weekly net counting surveys and conduct harvest and effort surveys opportunistically when harvesters are present on the river. Surveys will consist of an interview instrument designed to collect both quantitative data (e.g. total harvest, trip harvest, hours fished during trip) and qualitative data (e.g. perceived effort, quality of fish, access to fish). The quantitative section of the survey will be used to determine Catch Per Unit Effort (CPUE). The CPUE calculation along with the net count survey will provide an estimate of harvest, an index of effort, and information about run timing.

In addition to collecting information from harvesters, surveyors will use the opportunity to share relevant information from State and Federal fishery managers. Surveyors will carry the latest news releases and be informed of the latest run estimates, forecasts, and harvest reports. A priority of the project is to promote two-way information sharing and allow harvesters an opportunity to easily voice concerns or questions throughout the season.

*Objective 2:* Phone surveys will use the same survey instrument as the on-site harvester interviews. Consent will be obtained prior to conducting an interview and a updated list of consenting harvesters will be maintained. Names will not be recorded as part of any survey. The contact list will be randomized by permit number to avoid contacting the same harvesters every time. Key respondents may volunteer to be contacted regularly for updated environmental and fishy conditions.

*Objective 3:* Effort and CPUE will be sampled each week and expanded to estimate weekly harvest. At the end of the season the sum of weekly harvest estimates will be used as an estimate of total harvest and compared to the total post season harvest reported on permits. The accuracy of harvest estimates is unknown and may simply be useful as an index if the accuracy is poor. Estimates of effort and CPUE are important in informing in-season management action and validating ADF&G run estimates.

*Objective 4:* Through the funding of this project WCA will purchase equipment such as a jet boat, safety gear, and handheld tablets that will allow them to further develop independent capability. Wrangell Cooperative Association will hire local personnel to participate in the survey program. New surveyors will receive boat training specific to the Stikine River, 1<sup>st</sup> Aid and CPR training, and will be encouraged to participate in available USFS safety trainings. The WCA staff will receive training from the USFS staff on the Esri<sup>®</sup> (ArcGIS Online<sup>®</sup>, Collector<sup>®</sup>, and Survey123<sup>®</sup>) and Microsoft<sup>®</sup> suite of software for use during data collection and reduction. The WCA will develop general and project specific trainings over

the funding period of the project. Training and equipment associated with this project will build the institutional knowledge and the capacity of WCA to develop an independent environmental program.

**Partnerships/Capacity Building:** This proposal was developed in partnership between the USFS and WCA with consultation from ADF&G. A primary objective of the project is to build the capacity of WCA to participate in in-season fisheries management. Currently, WCA lacks the capacity to fully implement a fishery monitoring project due to a lack of equipment and trained fisheries personnel. Through a partnership with the USFS and funding associated with this project, WCA will receive the equipment, training, and experience necessary to conduct fisheries monitoring and develop an autonomous environmental program.

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<b>Project Number:</b>	22-602			
<b>Title:</b>	Falls Lake Subsistence Sockeye Salmon Stock and Harvest Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends an Harvest Monitoring			
<b>Principal Investigator:</b>	Kyle Rosendale, Fish Biologist, USDA Forest Service			
	Justin Koller, Fish and Wildlife Biologist, USDA Forest Service			
<b>Co-investigators:</b>	Dawn Jackson, Organized Village of Kake (OVK)			
<b>Project Cost:</b>	<b>2022:</b> \$142,950	<b>2023:</b> \$143,023	<b>2024:</b> \$146,724	<b>2025:</b> \$150,535
<b>Total Cost:</b>	\$583,232			

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**Issue:** Sockeye Salmon (*gaat*, *Oncorhynchus nerka*) returning to Falls Lake are heavily utilized by residents of Kake, Alaska in a subsistence fishery occurring as early as mid-June and lasting through mid-August. In the years 2001-2020 an average of 4,144 (SD = 2,353; range = 1,053 - 10,307) Sockeye Salmon returned to the marine terminal area. Exploitation rate is highly variable and, in some years, up to 70% of the terminal run has been harvested. The average exploitation rate for 2001-2020 was 33% (SD = 16%; range = 14 - 70%). Subsistence harvest has declined substantially from its peak in the early 2000s. Annual stock assessments are essential due to the high variability of annual terminal abundance coupled with the potential for a high exploitation. It should be noted that 2020 was the lowest terminal run on record for Falls Lake, demonstrating the need for continued monitoring. In-season data generated by the project supports management decisions to conserve the population and maximize subsistence harvest opportunities. Without an assessment of Sockeye Salmon abundance and subsistence harvest, managers would be forced to manage the fishery more conservatively (e.g., lower harvest limits and a shorter season), which could result in lost harvest opportunity for users.

#### Objectives:

1. Estimate the escapement of Sockeye Salmon into Falls Lake with a coefficient of variation less than 15%.
2. Estimate the age, sex and length distribution of Sockeye in the Falls Lake escapement with a coefficient of variation less than 10%.
3. Estimate the subsistence harvest of Sockeye Salmon in the marine area around Falls Lake Creek with a coefficient of variation less than 15%.

4. Collect daily stream temperature data and estimate daily stream discharge at Falls Lake according to standard USGS protocols.

**Methods:** Objective 1: The abundance of Sockeye Salmon entering the lake will be estimated by standard mark-recapture methods. A fish trap will be constructed just above the Falls Lake fish ladder to capture a sample of the population migrating into Falls Lake. All fish in the trap will be marked with an adipose fin clip and will be released immediately below a net weir equipped with an underwater video chute. The motion detected video footage will be used to sample Sockeye Salmon for marks as part of a mark recapture estimate.

Objective 2: Standard methods will be used to collect age, sex, and length data. A subset of Sockeye Salmon in the trap will have three scales removed and sent to the Alaska Department of Fish and Game Mark, Tag, and Aging Laboratory in Douglas, AK. Length will be measured from mid-eye to tail fork and sex determined by standard morphological characteristics.

Objective 3: Harvesters observed in the marine terminal area will be interviewed using a standard single-staged sampling design. All interviews will be confidential and harvest and effort data will be stratified by gear type.

Objective 4: Stream temperature and discharge data will be collected by following standard US Geological Survey protocols. Data loggers will collect temperature and water level data every thirty minutes. Streamflow estimates will follow the Midsection Method, with weir personnel using a flow meter, wading rod, and stream tape to estimate flow at many points across the stream.

**Partnerships/Capacity Building:** The USFS staff will provide general project oversight, sample design and analysis, reporting, budget management, and proposal development. The OVK staff will provide input on community issues, natural resource issues, and future direction of the project, employ field technicians, and manage a budget for personnel, supplies, and logistical support (e.g., transportation). The partnership between OVK and the USFS has led to the ongoing success of other Sockeye Salmon monitoring projects in the area. OVK staff will gain skills and knowledge that can be used in combination with Traditional Ecological Knowledge to help OVK manage its traditional resources.

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<b>Project Number:</b>	22-603			
<b>Title:</b>	Gut Bay Subsistence Sockeye Salmon Stock and Harvest Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends (SST) and Harvest Monitoring (HM)			
<b>Principal Investigator:</b>	Kyle Rosendale, Fish Biologist, USDA Forest Service			
<b>Co-investigators:</b>	Justin Koller, Fish and Wildlife Biologist, USDA Forest Service Dawn Jackson, Organized Village of Kake (OVK)			
<b>Project Cost:</b>	<b>2022:</b> \$144,172	<b>2023:</b> \$144,817	<b>2024:</b> \$148,571	<b>2025:</b> \$152,437
<b>Total Cost:</b>	\$589,997			

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**Issue:** Sockeye Salmon is one of the most important traditional foods for the community of Kake. Gut Bay is currently one of three primary systems used for subsistence harvest of Sockeye Salmon (*gaat*, *Oncorhynchus nerka*) by residents of Kake. Sockeye escapement, biological structure, and harvest intensity at Gut Bay are not well understood. Permits returned to the Alaska Department of Fish and Game show that the number of Sockeye harvested at Gut Bay can vary by an order of magnitude. Escapement estimates are needed to ensure sustainable management of Gut Bay Sockeye Salmon. Previous studies were unsuccessful at using beach seine surveys on the spawning grounds to estimate escapement into Gut Bay Lake and ultimately recommended that a weir project be implemented to address concerns about annual harvest and the methods used to harvest Sockeye. Reliable escapement and in-season subsistence harvest estimates at Gut Bay were identified as Priority Information Needs by the Fisheries Resources Monitoring Program (FRMP), Southeast Region. Escapement and harvest data will allow managers to better conserve the population and maximize subsistence harvest.

**Objectives:**

1. Estimate the escapement of Sockeye Salmon into Gut Bay with a coefficient of variation less than 15%.
2. Estimate the age, sex and length distribution of Sockeye in the Gut Bay escapement with a coefficient of variation less than 10%.
3. Estimate the subsistence harvest of Sockeye Salmon in the marine area around Gut Bay with a coefficient of variation less than 15%.
4. Collect daily stream temperature data and estimate daily stream discharge at Gut Bay according to standard USGS protocols.

**Methods:** Objective 1: A rigid picket weir will be installed above the high tide line. Salmon will be identified to species and enumerated. The weir count will be validated by standard mark-recapture methods. A net weir equipped with an underwater video chute will be installed upstream of the picket weir. The motion detected video footage will be used to sample Sockeye Salmon for marks.

Objective 2: Standard methods will be used to collect age, sex, and length data. A subset of Sockeye Salmon in the trap will have three scales removed and sent to the Alaska Department of Fish and Game Mark, Tag, and Aging Laboratory in Douglas, AK. Length will be measured from mid-eye to tail fork and sex determined by standard morphological characteristics.

Objective 3: Harvesters observed in the marine terminal area will be interviewed using a standard single-staged sampling design. All interviews will be confidential and harvest and effort data will be stratified by gear type.

Objective 4: Stream temperature and discharge data will be collected by following standard US Geological Survey protocols. Data loggers will collect temperature and water level data every thirty minutes. Streamflow estimates will follow the Midsection Method, with weir personnel using a flow meter, wading rod, and stream tape to estimate flow at many points across the stream.

**Partnerships/Capacity Building:** The USFS staff will provide general project oversight, sample design and analysis, reporting, budget management, and proposal development. The OVK staff will provide input on community issues, natural resource issues, and future direction of the project, employ field

technicians, and manage a budget for personnel, supplies, and logistical support (e.g., transportation). The partnership between OVK and the USFS has led to the ongoing success of other Sockeye Salmon monitoring projects in the area. OVK staff will gain skills and knowledge that can be used in combination with Traditional Ecological Knowledge to help OVK manage its traditional resources.

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<b>Project Number:</b>	22-604			
<b>Title:</b>	Hetta Lake Subsistence Sockeye Salmon Stock Assessment Project			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Anthony Christianson, Hydaburg Cooperative Association			
<b>Co-investigators:</b>	Cathy Needham, Kai Environmental Consulting Services			
<b>Project Cost:</b>	<b>2022:</b> \$165,829	<b>2023:</b> \$158,563	<b>2024:</b> \$158,563	<b>2025:</b> \$158,563
<b>Total Cost:</b>	\$641,518			

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**Issue:** The Hydaburg Cooperative Association (HCA) is proposing to continue work on documenting subsistence harvest of sockeye salmon in traditionally and culturally important sockeye systems in their traditional territory, as well as continue to estimate escapement of sockeye salmon into their number one important subsistence systems, Hetta Lakee. This information will continue to allow HCA and resource management agencies to monitor sockeye salmon returns in order to make in-season management decision for subsistence harvest and commercial fisheries. In addition, data will be used in the long term management of sockeye salmon in order to continue to provide for a subsistence priority for federally qualified subsistence users.

**Objectives:**

- 1) Census the sockeye salmon harvest by subsistence fishers in the terminal areas of Hetta, Eek, Kasook, and Hunter Bay using completed-trip interviews of all fishers on the fishing grounds or immediately upon returning to Hydaburg from the fishing grounds.
- 2) Count the number of sockeye salmon and other salmon species returning to Hetta Lake through a bipod weir.
- 3) Estimate the age composition of the sockeye salmon escapement so that the coefficient of variation is 10% or less for the two major age classes and describe the size distribution of each age class by sex.

**Methods:** Each year, crew members and the project manager will monitor the subsistence grounds, and interview all fishers once their harvest for the day is complete. Information collected during each interview will include date, area fished, interview location, time of interview, gear used, number of hours fished, number of net sets, catch by species, and comments.

A channel spanning bipod weir will be constructed on the outlet stream of Hetta Lake, with a trap constructed to capture fish migrating upstream to spawn. The weir will operate from June through September of each year, and all fish crossing the weir will be identified and counted. Approximately 600 fish will be sampled for age, sex and length data. Fish will be measured and sexed on site. Scales will be removed and sent to ADFG to be read to determine age. Data will be analyzed to estimate the spawning population of sockeye. Weekly in-season reports of harvest and weir counts will be shared with state and federal agencies. Annual reports will be produced after each field season, and a final report including all four seasons will be produced at the end of the project.



**Partnership/Capacity Building:** Since 2001, HCA has worked with Alaska Department of Fish and Game and the U.S. Forest Service to build capacity on Fisheries Resource Monitoring Program projects with a goal of becoming the principle investigator. In 2010, HCA became the principle investigator for the Hetta Lake Subsistence Sockeye Salmon Stock Assessment Project and in 2015 began stock assessment work at Eek Lake as a principle investigator. ADFG will continue to offer scale reading services to the project and remain involved through permitting of the project, as well as using in-season data for managing a commercial fishery for all of Cordova Bay. The HCA also continues to work with and build trust with Hydaburg residents, and others on Prince of Wales Island, through education and outreach and asking for continued support for in-season management decision on sockeye salmon harvest.

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<b>Project Number:</b>	22-605			
<b>Title:</b>	Lake Eva Subsistence Sockeye Salmon Stock and Harvest Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Kyle Rosendale, Fish Biologist, USDA Forest Service			
<b>Co-investigators:</b>	Justin Koller, Fish and Wildlife Biologist, USDA Forest Service Jacob Musslewhite, Fish Biologist, USDA Forest Service  Raynelle Jack, Angoon Community Association (ACA)			
<b>Project Cost:</b>	<b>2022:</b> \$210,839	<b>2023:</b> \$127,215	<b>2024:</b> \$130,348	<b>2025:</b> \$141,568
<b>Total Cost:</b>	\$609,971			

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**Issue:** Lake Eva is located on northeast Baranof Island, approximately 32 km from the community of Angoon. Sockeye Salmon have long been a highly prized and key resource for Tlingit people in Southeast Alaska. Traditional Ecological Knowledge and archeological findings at a *Teikweidi* settlement suggest that Lake Eva has been an important Sockeye Salmon (*gaat*, *Oncorhynchus nerka*) and berry harvest site for over five thousand years. Kanalku Lake, Angoon's primary subsistence Sockeye Salmon site, has seen severe declines in abundance, forcing the community to harvest from other systems. Residents of both Angoon and Sitka have dramatically increased their harvest of Lake Eva Sockeye Salmon since 2017 and little is known about the population's abundance, run timing, or structure, warranting a monitoring project to ensure the population is sustainably harvested.

**Objectives:**

1. Estimate the escapement of Sockeye Salmon into Lake Eva with a coefficient of variation less than 15%.
2. Estimate the age, sex and length distribution of Sockeye in the Lake Eva escapement with a coefficient of variation less than 10%.
3. Estimate the subsistence harvest of Sockeye Salmon in the marine area around Lake Eva with a coefficient of variation less than 15%.
4. Collect daily stream temperature data and estimate daily stream discharge at Lake Eva according to standard USGS protocols.

**Methods:** Objective 1: A rigid picket weir will be installed approximately halfway between the lake outlet and salt water. Salmon will be identified to species and enumerated. The Sockeye Salmon weir count will be validated by standard mark-recapture methods. Sockeye Salmon staging in the lake near the spawning stream will be captured by beach seine and sampled for marks. All Sockeye Salmon captured in a beach seine will be given a secondary mark to sample without replacement.

Objective 2: Standard methods will be used to collect age, sex, and length data. A subset of Sockeye Salmon in the trap will have three scales removed and sent to the Alaska Department of Fish and Game Mark, Tag, and Aging Laboratory in Douglas, AK. Length will be measured from mid-eye to tail fork and sex determined by examining morphological characteristics.

Objective 3: Harvesters observed in the marine terminal area will be interviewed using a standard single-staged sampling design. All interviews will be confidential and harvest and effort data will be stratified by gear type.

Objective 4: Stream temperature and discharge data will be collected following standard US Geological Survey protocols. Data loggers will collect temperature and water level data every thirty minutes. Streamflow estimates will follow the Midsection Method, with weir personnel using a flow meter, wading rod, and stream tape to estimate flow at many points across the stream.

**Partnerships/Capacity Building:** The USFS staff will provide general project oversight, sample design and analysis, reporting, budget management, and proposal development. The ACA staff will provide input on community issues, natural resource issues, and future direction of the project, employ field technicians, and manage a budget for personnel, supplies, and logistical support (e.g., transportation). The partnership between ACA and the USFS has led to the ongoing success of other Sockeye Salmon monitoring projects in the area. ACA staff will gain skills and knowledge that can be used in combination with Traditional Ecological Knowledge to help ACA manage its traditional resources.

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<b>Project Number:</b>	22-607			
<b>Title:</b>	Neva Lake Sockeye Salmon Stock Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Jacob Musslewhite, Fisheries Biologist, USDA Forest Service (USFS)			
<b>Co-investigators:</b>	Robert Starbard, Executive Director, Hoonah Indian Association (HIA)			
<b>Project Cost:</b>	<b>2022:</b> \$118,122	<b>2023:</b> \$120,447	<b>2024:</b> \$122,828	<b>2025:</b> \$126,004
<b>Total Cost:</b>	\$487,401			

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**Issue Addressed:** This project addresses the priority information need for reliable estimates of Sockeye Salmon escapement and in-season harvest and estimates of stream discharge in a list of Southeast Alaska systems including Neva Lake. Sockeye Salmon returns to Neva Lake (**Error! Reference source not found.**) have long been an important subsistence resource for Tlingit families living in Excursion Inlet, Hoonah, and other areas of northern Southeast Alaska (de Laguna 1960; Schroeder and Kookesh 1990; Goldschmidt and Haas 1998; Ratner and Dizard 2005; Langdon 2006). The lake is the most convenient

source of Sockeye Salmon for rural communities in Icy Strait, including Hoonah, Gustavus, and Excursion Inlet.

Neva Lake has also been the focus of recent management actions to protect the health of the stock. In 2016, the Alaska Department of Fish and Game reduced the annual Sockeye Salmon bag limit from 40 fish to 10 fish, in response to declining escapements. In 2019, the Federal Subsistence Board restricted the harvest of Sockeye Salmon in the Federal waters of Neva Lake, Neva Creek and South Creek to qualified rural residents (OSM 2019; 84 Fed. Reg. 39744-39754 [August 12, 2019]). Since then, the escapements to the lake have improved, while the reported subsistence harvest has declined. The escapement estimates obtained by this project will be critically important to State and Federal biologists evaluating the effectiveness of these actions, assuring the health of this resource, and maintaining the availability of Neva Lake Sockeye Salmon to local subsistence users.

### **Objectives:**

1. Count (census) the annual escapement of adult and jack Sockeye Salmon into Neva Lake using video weirs.
2. Determine, with 90% certainty, if at least 90% of the Sockeye Salmon spawners in Neva Lake are freshwater age-1.
3. Measure and record the temperature and discharge of Neva Creek during the Sockeye Salmon spawning migration.

### **Project Activities and Methods:**

*Escapement Count.* This proposal is to continue operation of remotely monitored video weirs at the outlet of Neva Lake. Video from the weirs will be transmitted to a recording station in Excursion Inlet, where project personnel will use a computer with Blue Iris surveillance software to count Sockeye Salmon and other species entering the lake as we have since 2016.

Video from the underwater cameras will be transmitted to a remote recording station in a crew cabin in Excursion Inlet. In the cabin, a computer running Blue Iris surveillance software records motion-triggered video clips which can be reviewed by the crew to count fish passing through the weirs. A high-speed wireless connection between Excursion Inlet and Hoonah connects the monitoring network to the internet. Each morning, project personnel will review the motion-triggered video files to count the escapement of Sockeye Salmon into the lake.

*Age, Sex, and Length Sampling.* A seasonal goal of 60 to 120 adult Sockeye Salmon will be captured in the Neva system using beach seine or dip net gear, sampled for age (scales), sex, and length (ASL) data, and released. A sample of 60 fish will allow us to determine, with 90% certainty, if at least 90% of the fish are  $\leq$  freshwater age-1. The freshwater ages can be used to determine if there are any appreciable numbers of fish  $\geq$  freshwater age-2, which might indicate if and when parent year escapements are high enough to fill (or exceed) the lake's rearing capacity.

*Temperature and discharge.* A permanent stream gage station will be established downstream of the lake outlet. As often as practical, we will measure the stage and stream discharge at the gage station, so that we can establish a stage-discharge curve for the stream. We will also install a Hobo U-20 water level and temperature logger at the station, which will record continuously throughout the year.

**Partnerships and Capacity Building:** The Hoonah Indian Association, ADF&G, and Forest Service began cooperating on Fisheries Resource Monitoring Program, Stock Status and Trend, projects at Neva Lake in 2002. Field personnel are all hired and employed by HIA and HIA has successfully filled these positions with local hires. HIA employees will participate in USFS safety training and have on-the-job training in how to sample fish and how to operate video weir, computer, networking, and solar power systems.

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<b>Project Number:</b>	22-608			
<b>Title:</b>	Kanalku Lake Sockeye Salmon Stock Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Jacob Musslewhite, Fisheries Biologist, USDA Forest Service (USFS)			
<b>Co-investigators:</b>	Raynelle Jack, Tribal Administrator, Angoon Community Association (ACA)			
<b>Project Cost:</b>	<b>2022:</b> \$52,853	<b>2023:</b> \$46,694	<b>2024:</b> \$47,395	<b>2025:</b> \$48,105
<b>Total Cost:</b>	\$195,047			

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**Issue Addressed:** This project addresses the priority information need for reliable estimates of Sockeye Salmon escapement and in-season harvest and estimates of stream discharge in a list of Southeast Alaska systems including Kanalku Lake. Kanalku Lake is Angoon’s preferred source for Sockeye Salmon, and has a documented history of use dating back for at least 1,000 years. Kanalku’s accessibility and popularity have made it one of the most vulnerable and politically sensitive subsistence resources in Southeast Alaska.

Over the past few decades, the Sockeye Salmon run and subsistence fishery at Kanalku has been the focus of many management actions and political controversies. These include a voluntary closure of subsistence harvest; a request for extraterritorial Federal jurisdiction over local salmon fisheries; an effort by the Forest Service to improve fish passage by blasting a partial barrier falls; and multiple changes in bag and possession limits, to name a few. The importance of this stock to Angoon’s food security and culture, its small size and susceptibility to harvest pressure, and the potential vulnerability to climate change make it a top priority for stock assessment and monitoring. Since the end of the most recent stock assessment project in 2017, the only indication of run strength at Kanalku has been the reported harvest on returned permits.

The proposed project will reinstate timely monitoring of Sockeye Salmon escapement to Kanalku Lake, providing managers the information needed to preserve the resource for the people of Angoon. It uses the most cost effective means possible, avoiding the expense and impact of a weir and staffed camp in a wilderness area.

**Objectives:**

1. Estimate the number of Sockeye Salmon spawning in Kanalku Lake, so the estimated coefficient of variation is less than 15%.
2. Determine, with 90% certainty, if at least 90% of the Sockeye Salmon spawners in Sitkoh Lake are  $\leq$  freshwater age-1.
3. Measure and record the discharge and temperature of the Kanalku Lake outlet stream during the Sockeye Salmon spawning migration.

**Project Activities and Methods:**

*Escapement count.* The study design for the escapement estimate will adopt the methods used by Conitz and in their work in Kanalku Lake. These projects used standard mark-recapture techniques to estimate the spawning population in a defined study area multiple times over the course of the spawning season. These estimates were then used to estimate the total number of fish spawning in the lake over the entire season.

Each sampling event will consist of two days of sampling. On the first day, the crew will capture fish on the study area spawning grounds with a beach seine. All fish captured will be given a left opercular punch with a shape assigned to that sampling event. On the second day of sampling, the crew will repeat the beach seining, inspect each captured fish for marks, and mark them with a right opercular punch to indicate the fish has been sampled. A Petersen estimate for the day will be generated from the number of fish marked and the subsequent recaptures. Marks recovered from prior sampling events will be used to generate the super population estimate for the season.

*Age, Sex, and Length Sampling.* A seasonal goal of 60 to 120 adult Sockeye Salmon will be captured in the Kanalku system using beach seine or dip net gear, sampled for age (scales), sex, and length (ASL) data, and released. A sample of 60 fish will allow us to determine, with 90% certainty, if at least 90% of the fish are  $\leq$  freshwater age-1. The freshwater ages can be used to determine if there are any appreciable numbers of fish  $\geq$  freshwater age-2, which might indicate if and when parent year escapements are high enough to fill (or exceed) the lake's rearing capacity.

*Temperature and discharge.* A permanent stream gage station will be established downstream of the lake outlet. As often as practical, we will measure the stage and stream discharge at the gage station, so that we can establish a stage-discharge curve for the stream. We will also install a Hobo U-20 water level and temperature logger at the station, which will record continuously throughout the year.

**Partnerships and Capacity Building:** Field personnel are all hired and employed by ACA, which has successfully filled these positions with local hires. Projects funded by FRMP have provided employment opportunities in Angoon throughout the years of partnership. ACA employees participate in USFS safety training and have on-the-job training in how to sample fish and how to operate video weir, computer, networking, and solar power systems.

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<b>Project Number:</b>	22-609			
<b>Title:</b>	Sitkoh Lake Sockeye Salmon Stock Escapement			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Jacob Musslewhite, Fisheries Biologist, USDA Forest Service (USFS)			
<b>Co-investigators:</b>	Raynelle Jack, Tribal Administrator, Angoon Community Association (ACA)			
<b>Project Cost:</b>	<b>2022:</b> \$92,749	<b>2023:</b> \$88,679	<b>2024:</b> \$89,991	<b>2025:</b> \$91,323
<b>Total Cost:</b>	\$362,742			

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**Issue Addressed:** This project addresses the priority information need for reliable estimates of Sockeye Salmon escapement and in-season harvest and estimates of stream discharge in a list of Southeast Alaska systems including Sitkoh Lake. Sockeye Salmon runs to Sitkoh Lake have long been an important subsistence resource for residents of Angoon and other rural communities in northern Southeast Alaska. Stock assessment projects monitoring the escapement of Sockeye Salmon to Sitkoh Lake have occurred since the 1990s. Between 2000 and 2010, escapements to Sitkoh Lake were typically 8,000 – 12,000 fish, but have declined steeply since then. From 2017 through 2019, 2,000 fish or fewer were estimated to be spawning in the lake. The most recent estimate of almost 10,000 fish in 2020 shows promise of a rebound from the past few years.

The recent years with low escapements coincided with dryer than normal summers and low streamflow, which appeared to hamper the spawning migration for Sockeye Salmon. A better understanding of the relationship between stream discharge and fish passage during the spawning migration will be crucial to successful management, especially in the face of ongoing climate change.

This project is important to assure that escapements are adequate to provide sustainable subsistence opportunity and to assess consequences of management actions related to both fishing and land use activities. This monitoring project should continue given the intensity of commercial and subsistence fishing on this stock, the importance of this subsistence resource to the community of Angoon, and the cost effectiveness of this project.

**Objectives:**

1. Count (census) the daily and annual escapement of Sockeye Salmon into Sitkoh Lake using a remotely monitored video weir.
2. Determine, with 90% certainty, if at least 90% of the Sockeye Salmon spawners in Sitkoh Lake are  $\leq$  freshwater age-1.
3. Measure and record the temperature and discharge of Sitkoh Lake Creek during the Sockeye Salmon spawning migration.

**Methods:**

*Escapement count.* Sockeye Salmon entering Sitkoh Lake will be counted using a remotely monitored video weir. The weir will be equipped with a video chute that allows free passage of fish and other animals through the weir. Multiple video cameras will be mounted in the video chute, providing different views of passing fish.

Live video from the underwater cameras, and from surveillance cameras at the Sitkoh weir site, will be wirelessly linked to computers at the ACA office in Angoon. Project personnel will use the Blue Iris surveillance software to save and review motion-triggered video clips and get hourly and daily counts of fish, by species, entering Sitkoh Lake. We will remotely monitor the project site and electronics over the internet to make sure that the weirs are functioning properly

The remote monitoring technology planned for use at Sitkoh has been developed and refined at the Sitkoh Lake and Neva Lake projects over the past few years. The video cameras, surveillance cameras, and networking equipment used have also been tested and used reliably over the past few years. Most importantly, it greatly improved the efficiency and reliability of counting fish by allowing simultaneous review of two or more cameras.

*Age, sex, and length sampling.* A seasonal goal of 60 to 120 adult Sockeye Salmon will be captured in the Sitkoh system using beach seine or dip net gear, sampled for age (scales), sex, and length (ASL) data, and released. A sample of 60 fish will allow us to determine, with 90% certainty, if at least 90% of the fish are  $\leq$  freshwater age-1. The freshwater ages can be used to determine if there are any appreciable numbers of fish  $\geq$  freshwater age-2, which might indicate if and when parent year escapements are high enough to fill (or exceed) the lake’s rearing capacity.

*Temperature and discharge.* A permanent stream gage station will be established downstream of the lake outlet. As often as practical, we will measure the stage and stream discharge at the gage station, so that we can establish a stage-discharge curve for the stream. We will also install a Hobo U-20 water level and temperature logger at the station, which will record continuously throughout the year.

**Partnerships and Capacity Building:** The ACA and USDA Forest Service have been cooperating on stock assessment projects for many years. Field personnel are all hired and employed by ACA, which has successfully filled these positions with local hires. Projects funded by FRMP have provided employment opportunities in Angoon throughout the years of partnership. ACA employees participate in USFS safety training and have on-the-job training in how to sample fish and how to operate video weir, computer, networking, and solar power systems.

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<b>Project Number:</b>	22-610			
<b>Title:</b>	Klag Lake Sockeye Salmon Stock Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends, Harvest Monitoring			
<b>Principal Investigator:</b>	Leigh Engel, Fisheries Biologist, Sitka Tribe of Alaska			
<b>Co-investigators:</b>	None			
<b>Project Cost:</b>	<b>2022:</b> \$202,039	<b>2023:</b> \$179,537	<b>2024:</b> \$185,415	<b>2025:</b> \$191,520
<b>Total Cost:</b>	\$758,511			

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**Issue:** Klag Lake is one of the most important sources of sockeye salmon (*Oncorhynchus nerka*) for the community of Sitka. However, escapement has been steadily declining in the last 10 years at Klag Lake. The past six years (2015-2020) have seen six of the seven lowest escapements on record, with 2018 having the lowest escapement of 2,444 sockeye salmon. Despite declining escapement and a reduction in subsistence harvests since monitoring was implemented in 2001, Klag Bay has a higher exploitation rate than other systems. The sockeye Klag Lake are extremely dependent upon high flows to escape into freshwater and the bathymetry of the bay and current harvest methods and limits allow for substantial numbers of sockeye to be efficiently harvested without any appreciable escapement. The Klag Lake Sockeye Salmon Stock Assessment Project will provide managers with daily escapement and harvest data to allow for in-season management decisions critical to sustainable management of the Klag Lake sockeye stock.

**Objectives:**

1. Enumerate the escapement of sockeye salmon at Klag Bay.
2. Describe the run timing, or proportional daily passage, of sockeye salmon through the weir.
3. Estimate the sex and age composition of sockeye salmon such that the coefficient of variation is 7.5% or less.

4. Estimate harvest by subsistence and sport fishermen at Klag Bay so that the coefficient of variation is 15% or less.

**Methods:** A rigid weir will be installed in the outlet stream of Klag Lake and escapement data will be recorded for all salmonids passing through the weir. A minimum of 462 sockeye salmon will be sampled for age, length, and sex data. Crew personnel will sample a running total of 10% to ensure sample goals are met and representative of the run despite low flow events. Mark-recapture methods will be used to validate the weir estimate for sockeye. A running total of approximately 20% of all sockeye at the weir will receive an adipose fin clip. Dead or spawned out fish will be sampled for marks on the spawning grounds; all sampled fish will receive a pelvic fin clip to ensure sampling without replacement. Creel surveys will be conducted with all fishing parties observed in Klag Lake. Escapement and harvest data will be reported to managers on a daily basis via satellite device to ADFG biologists.

**Partnerships/Capacity Building:** The Sitka Tribe of Alaska is the principal investigator for the project and has worked closely and successfully with the Alaska Department of Fish & Game and the US Forest Service. Most previously funded Fisheries Resource Monitoring Program projects were not led by Alaska Native organizations, so tribal leadership of the Klag Lake Sockeye Salmon Stock Assessment Project is noteworthy.

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<b>Project Number:</b>	22-611			
<b>Title:</b>	Tongass National Forest Sockeye Salmon Quantitative eDNA Stock Monitoring			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Robert Cross, USDA Forest Service			
<b>Co-investigators:</b>	None			
<b>Project Cost:</b>	<b>2022:</b> \$68,315	<b>2023:</b> \$49,249	<b>2024:</b> \$49,546	<b>2025:</b> \$49,849
<b>Total Cost:</b>	\$216,959			

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**Issue:** The Tongass National Forest has over 100 Sockeye Salmon (*Oncorhynchus nerka*) producing systems. Collecting up to date stock assessments on each of these systems is impossible since Sockeye Salmon monitoring projects are logistically challenging, labor intensive, and expensive. It is becoming increasingly necessary to implement cost effective methods of monitoring Sockeye Salmon. Quantitative eDNA sampling could allow managers to monitor more systems for less money if properly tested at established monitoring sites and validated with traditional enumeration techniques. The use of existing FRMP weir sites provides cost saving infrastructure from which to measure the value of eDNA as a monitoring tool within the Tongass National Forest. The Organized Village of Kake (OVK) and Hydaburg Cooperative Association (HCA) have expressed support testing this technology at their existing monitoring sites.

**Objectives:**

1. Test the relationship between estimated Sockeye Salmon escapement and eDNA concentrations within three systems;
2. Determine the efficacy of quantitative eDNA as an estimate or index for annual Sockeye Salmon escapement;



3. Compare the relationship between estimated Sockeye Salmon escapement and eDNA concentrations between systems.

#### **Methods:**

*Objective 1:* Concentrations of eDNA will be sampled daily at each selected weir site for the duration of the Sockeye Salmon season. Samples will be taken from the same sampling location prior to weir operations each morning to avoid contaminating samples with upstream activities. Duplicate 1-L stream water samples will be collected at each site and filtered through a 0.45µm cellulose nitrate filter using a battery-powered peristaltic pump. If flow ceased due to clogging, filtered water will be measured to the nearest 5 ml using a 1-L graduated cylinder and eDNA concentration will be corrected for volume. Filters will be preserved in silicone desiccant beads and sent to the USFS Rocky Mountain Research Station (RMRS) in Missoula, Montana, for processing. The sum of daily peak concentration and the total eDNA area under the curve concentrations will be compared to the daily and total Sockeye Salmon weir counts, respectively. Concentrations of eDNA will be modeled with flow and stream temperature to determine the best fit.

*Objective 2:* Models of flow corrected eDNA concentration and Sockeye Salmon escapement will be developed for each of the selected Sockeye Salmon systems each year of the project. Annual models will be combined in each system to identify any interaction effect between year and flow corrected eDNA concentration. If there is no significant interaction, then it would suggest that eDNA concentrations are consistent across years and may be used to compare Sockeye Salmon abundance between years within a single system.

*Objective 3:* Models developed for each Sockeye Salmon system will be combined to test for interaction effects between system and flow corrected eDNA concentration. Models from neighboring systems may have the highest likelihood of consistent eDNA concentrations. However, all iterations will be run to determine if eDNA concentrations in one system has any predictive value in another system.

**Partnerships/Capacity Building:** All of the staffed FRMP Sockeye Salmon weirs on the forest are operated by or have partnerships with Native organizations. The proposed project is designed to develop the capacity of existing partners to conduct eDNA monitoring. A quantitative eDNA monitoring program has the potential to increase the participation of new and existing partners in the Tongass FRMP. Cost effective monitoring techniques, such as eDNA sampling, have the potential to increase the number of monitoring sites and capacity of partners across the forest. The Forest uses eDNA to monitor amphibians, function of fish pass/fish barriers, invasive species, and rare species. Developing the capacity for these partners to complete both presence-absence and quantitative eDNA sampling greatly increases the available monitoring funding and workload.

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<b>Project Number:</b>	22-612
<b>Title:</b>	Northern Southeast Alaska Eulachon Population Dynamics Monitoring
<b>Geographic Region:</b>	Southeast Alaska Region
<b>Data Type:</b>	Stock Status and Trends
<b>Principal Investigator:</b>	Meredith Pochardt, Chilkoot Indian Association Ted Hart, Chilkoot Indian Association Derek Poinsette, Takshanuk Watershed Council Reuben Cash, Skagway Traditional Council

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<b>Project Number:</b>	22-612			
	Taal Levi, Oregon State University			
<b>Project Cost:</b>	<b>2022:</b> \$207,062	<b>2023:</b> \$210,844	<b>2024:</b> \$208,358	<b>2025:</b> \$214,259
<b>Total Cost:</b>	\$840,523			

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A subsistence lifestyle is the backbone of Alaskan native culture. A key component of that subsistence lifestyle for many coastal tribes has been the eulachon (*Thaleichthys pacificus*). Eulachon are a small anadromous smelt with a highly nutritious fat content (20%) that represent an important nutritional resource at the base of the food web (Moody, 2008), producing an important oil for medicine, food, and fuel and a high value trade due to its relative scarcity and desirability (Betts 1994).

The majority of eulachon populations have been declining since the 1990s (Hay et al. 2000). In 2010 the National Marine Fisheries Service (NMFS) listed the southern distinct population segment (DPS) in Washington, Oregon, and California as threatened under the Endangered Species Act (NOAA, 2010). While some of the declines have been well documented, most populations of eulachon are either unknown or anecdotal (Betts, 1994). Eulachon abundance throughout southeast Alaska has unexpectedly and precipitously declined in key subsistence fisheries in recent years (Southeast Region Planning Workgroup, 2006).

To complicate eulachon population monitoring, unlike salmonids, they do not necessarily return to their natal river to spawn, but rather select a river within a region (Flannery, et al. 2009). Thus a decline in spawning biomass in any one river system does not necessarily represent a decline in the eulachon population. This lack of knowledge combined with variable spawning biomass and low fidelity to natal rivers complicates management decisions and necessitates population monitoring techniques that can be implemented regionally.

The lack of eulachon population information and the cultural and subsistence value of the species led the Chilkoot Indian Association (CIA) to partner with the Takshanuk Watershed Council (TWC) to begin a eulachon mark-recapture population estimate on the Chilkoot River in 2010 (Figure 1). This population estimate was expanded in 2014 with the addition of environmental DNA (eDNA) data collection through a partnership with Dr. Taal Levi and Oregon State University (OSU). Due to the regional population structure of eulachon this study was expanded in 2016 to the Taiya and Skagway Rivers through a partnership with Skagway Traditional Council (STC). Through funding from the Bureau of Indian Affairs in 2017 this study was further expanded to collect eDNA data at 10 rivers in northern Southeast Alaska as well as the continuation of the Chilkoot mark-recapture population. Development and testing of low-cost long-term monitoring methods, such as environmental DNA (eDNA), is needed to facilitate long-term monitoring of this critical subsistence resource in order to enable detection of changes in population or phenology.

The overall goal of this proposal is to build the capacity of tribal governments to develop a regional tribally-based eulachon population monitoring network to analyze annual spawning biomass and run timing of eulachon. This will be accomplished through addressing the following objectives.

Objective 1: Determine eulachon spawning biomass at a region-wide scale in northern Southeast Alaska utilizing mark-recapture methods and environmental DNA (eDNA)

- A. eDNA (Chilkoot, Chilkat, Ferebee, Taiya, Skagway, Katzehin, Lace, Antler, Mendenhall, and Eagle). Investigators: CIA, TWC, OSU, STC
- B. Mark-recapture (Chilkoot) Investigators: CIA, TWC

Objective 2: Conduct a comprehensive subsistence harvest survey within the communities of Haines, Klukwan, and Skagway to estimate annual harvest amount and number of households harvesting eulachon.

Objective 3: Determine the spatial and temporal dynamics of eulachon spawning including run timing and environmental covariate

Objective 4: Present research findings to the Southeast Subsistence Advisory Committee, the Southeast Form on the Environment, and the North Pacific Research Board annual Marine Science Symposium.

Objective 5: Develop a regional eulachon working group to 1) establish a long-term monitoring plan, 2) produce a region-wide eulachon status report.

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<b>Project Number:</b>	22-613			
<b>Title:</b>	Unuk River Eulachon Population Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status Trends			
<b>Principal Investigator:</b>	Robert Cross, USDA Forest Service			
<b>Co-investigators:</b>	Jon Hyde, USDA Forest Service Keenan Sanderson, Ketchikan Indian Community (KIC)			
<b>Project Cost:</b>	<b>2022:</b> \$65,541	<b>2023:</b> \$39,376	<b>2024:</b> \$40,269	<b>2025:</b> \$40,170
<b>Total Cost:</b>	\$185,356			

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**Issue:** Eulachon (*Thaelichthys pacificus*) systems in Southeast Alaska are typically large glacial rivers located on the mainland. The Unuk River has been a primary commercial/subsistence fishing location for Eulachon in Southeast Alaska. The Unuk River, which drains into Burroughs Bay in Behm Canal, is located approximately 55 nautical miles northeast of Ketchikan on the Tongass National Forest. Other drainages in the Ketchikan area where Eulachon have been noted and harvested include: Klahini River, Chickamin River, Wilson & Blossom Rivers, and Carroll Inlet/Creek. Most of these drainages, except for Carroll Inlet/Creek, are located in the Misty Fjords National Monument Wilderness and can only be access by air or boat.

The spring Eulachon run provides food for congregating marine mammals, fish, and birds. Eulachon also provide the first subsistence opportunity of the year for many people. The Unuk River supported subsistence, personal use, and commercial fisheries for many years. The first documented commercial harvest of Unuk River Eulachon occurred in 1940 and continued sporadically until 2001 when the State managed commercial fishery was shut down. The Federal subsistence fishery continued until 2005. Since 2005, the fishery has been closed by both State and Federal managers due to poor Eulachon returns.

The majority of the harvest in District 1 has occurred in the lower stretches of the Unuk River with very little documentation of harvest from the other listed locations. Although prior to 2001, historical Eulachon harvest had taken place under commercial regulations, the subsistence fishery under Federal management

is just as important in the eyes of the subsistence user as provisions allow for customary trade of the resource. The primary purpose of this harvest has been to distribute Eulachon to the communities of Saxman, Metlakatla, Ketchikan and other outlying areas. Due to the great distance of the Unuk River from these communities, local users depended on the commercial harvesters for their yearly Eulachon. The ADFG Division of Subsistence documented in 1987 that 27% of residents in the rural community of Metlakatla utilize Eulachon.

**Objectives:**

1. Document run timing and spawning locations, and estimate biomass of Eulachon in the Unuk River, Chickamin, Klahini, Wilson, Blossom Rivers and in Carroll Inlet/Carroll Creek;
2. Estimate age-sex-length (ASL) distribution of the Eulachon escapement with a coefficient of variation less than 10%;
3. Document harvest methods, harvest levels, and run timing by on-site observations;
4. Expand the capacity of KIC to conduct future Eulachon monitoring.

**Methods:**

*Objective 1:* The project will deploy two satellite network cameras in the project area prior to the Eulachon run with the goal of focusing ground crew and aerial survey efforts. The cameras will be monitored remotely from the Ketchikan Ranger District office to identify Eulechon predator abundance. Crew transport flights will also be used for aerial surveys whenever possible. Aerial surveys will be recorded using duplicate downward facing mounted video cameras (GoPro®) for review and analysis. A ground crew will live on site and survey all six areas one or more times a day. Surveys will consist of at least two crew members walking, boating, or snorkeling the river to estimate Eulachon biomass.

*Objective 2:* Age, sex, and length will be obtained from sampled Eulachon using standard methods. Age will be determined from otoliths at the ADF&G Mark, Tag, and Aging Laboratory and sex will be determined from established morphological characteristics. Fish lengths will be measured from the tip-of-the-snout to the fork-of-the-tail to the nearest mm and weight will be measured to the nearest 0.01g. Weight will vary with spawning condition and will pooled by condition and sex.

*Objective 3:* Harvest and effort will be sampled during open Eulachon seasons on the Unuk River. The ground crew will document harvest location, total harvest, and catch per unit effort, and any harvester observations. Total harvest will be recorded on all Federal subsistence Eulachon harvest permits and returned post-season.

*Objective 4:* The USFS will provide pre-season training during the four-year funding cycle. The KIC surveyor training will focus on field safety, knowledge and comprehension of the survey and sampling techniques, standardized estimates of school size and density, development of logistical and organizational skills for survey implementation and data management in the field.

**Partnership and Capacity Building:** This project proposal is the result of a partnership between the USFS and KIC and consultations with Metlakatla Indian Community and Organized Village of Saxman. The goal of developing training, survey protocols, and partnerships will be to increase the capacity of all agencies and organizations involved in future Unuk River Eulachon monitoring. This project aims to increase KIC's capacity to perform biological monitoring through equipment and institutional knowledge gained throughout the project timeline.

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<b>Project Number:</b>	22-650			
<b>Title:</b>	Providing updated community harvest information and documenting subsistence harvest patterns in three northern Southeast Alaska communities.			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Harvest Monitoring/Traditional Ecological Knowledge			
<b>Principal Investigator:</b>	Lauren Sill, ADF&G Division of Subsistence, Douglas			
<b>Co-investigators:</b>	None			
<b>Project Cost:</b>	<b>2022:</b> \$9,610	<b>2023:</b> \$195,334	<b>2024:</b> \$156,603	<b>2025:</b> \$16,414
<b>Total Cost:</b>	\$377,961			

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**Issue Addressed:** The project proposes to update subsistence harvest and use information for the communities of Pelican, Gustavus, and Tenakee Springs in direct fulfillment of the priority information need articulated for the Southeast Region in the OSM document, which was to “Update community household fish harvest surveys.” All three communities are fishing communities with historically high participation and dependence on commercial fisheries and subsistence resources. The most recent comprehensive noncommercial harvest and use information available for these three communities dates to 1987. Nearly all the residents of these three communities use salmon or nonsalmon fish.

ADF&G requires mandatory harvest reporting for most species that require a permit or harvest tickets, such as salmon or large game. Additionally, ADF&G conducts biannual voluntary halibut harvest surveys and occasional marine mammal harvest surveys. The methods used to collect these permit data provide only harvest numbers; estimates are not always accurate, and they decouple harvest from the broader context in which the resources are harvested. For example, permits do not document information about household demographics, sharing practices, or qualitative assessments about the harvests, all of which provide important explanatory context. Moreover, permits cover only a small subset of the variety of wild resources that are used by communities. The full context for subsistence harvests is necessary to adequately evaluate changes in the harvest of any particular species.

Over the 30 years since the last comprehensive harvest survey, these communities have experienced significant demographic, economic, and regulatory changes which have likely affected their subsistence harvest and use patterns. Pelican has lost more than half of its population while Tenakee Springs and Gustavus have grown, by one-third and 200%, respectively. Economic opportunities in the communities have shifted. Local participation in the timber industry and in commercial fisheries has declined while tourism (especially in Glacier Bay National Park, established in 1980) has grown. Additionally, the federal government established a federal subsistence halibut fishery in Alaska in 2003. To date, there has been no investigation into how this new regulation has modified household use of salmon or other kinds of fish, but recent surveys in other Southeast Alaska communities suggest that halibut harvests may have replaced some salmon harvests. A lack of information on the use of subsistence resources in the proposed study communities creates obstacles for communities, managers, and regulatory boards to advocate for or make informed decisions that are in the best interests of the communities and that continue to provide a subsistence priority.

**Objectives:** The objectives of this project are to: 1) Produce reliable estimates of the harvests and uses of wild resources for study year 2023 by residents of Gustavus, Tenakee Springs, and Pelican; 2) Record the geographic extent of search and harvest areas for wild resources by residents of Gustavus, Tenakee Springs, and Pelican during the study year; and 3) Document observations of subsistence harvesting practices, harvest trends, and areas used for subsistence activities over time.

**Methods:** At the outset of the project, the PI will hold scoping meetings in each of the proposed study communities to discuss the project’s goals, objectives, methods, and how the collected data can be used.

Researchers will conduct field work employing two integrated social science data gathering methods: household harvest surveys and key respondent interviews.

Researchers will use voluntary household harvest surveys with a mapping component to address objectives 1 and 2. The Division of Subsistence has used harvest surveys for over 40 years to collect information about the use and harvest of resources by Alaska residents that has been the foundation of accurate subsistence harvest data useful to the Federal Subsistence Board and the Alaska Board of Fisheries. Based on standard Division of Subsistence sampling strategies, researchers will attempt a census of Tenakee Springs (72 households) and Pelican (41 households) and a 40% sample of the 212 households in Gustavus. Project staff will hire local research assistants (LRAs) and train them in survey administration; ADF&G staff and LRAs will conduct the surveys in teams. The PI, working with Division of Subsistence Information Management staff, will design the household survey to collect information about a household's participation in subsistence activities, the harvest and use of wild resources, demographics and economic information, as well as questions about the food security of the households. During the household surveys, researchers will document the geographic extent of the search and harvest activities for the study year for each resource category. Researchers will record the points, lines and polygons reported by the respondent along with related information such as the species sought, the season of harvest, methods of access to the site, and gear used.

Through recommendations of the local government, LRAs, and others in the community, the PI will attempt to interview knowledgeable residents from each study community. Respondents will be a mix of ages and genders, will have current or past experience with subsistence activities, and ideally will be long-time residents of the area. The PI will develop a list of topics and questions to prompt discussion following the community scoping meeting and consultation with the ADF&G area biologist and local city councils. General topics likely to be discussed include local traditional knowledge (LTK) concerning salmon runs, populations, habitat, and harvest. Interviewers will also use maps to encourage discussion and to record temporal changes in harvest locations since the previous comprehensive survey. Interviewers will attempt 2–10 interviews in each community, depending on population size.

When draft project results are available, researchers will return to the communities to hold a review session with residents to present the preliminary data, address any concerns residents have with the data, and resolve any discrepancies noted. The data presented will include tables and figures created from the household survey analysis, maps of harvest areas for different resource categories for the study year, and composite maps of harvest areas resulting from the key respondent interviews.

**Partnerships and Capacity Building:** Individuals, communities, and local and regional councils can use information collected through this project to advocate for subsistence practices before the Federal Subsistence Board, Alaska Board of Fisheries or Board of Game. During the planning and implementation phase of the project, researchers will stay in contact with local government councils, asking for assistance with survey development, interview protocols, and logistics. During the project, if researchers become aware of issues in any of the communities that could be addressed through the state or federal regulatory processes, researchers can assist the local tribal council, regional association, Subsistence Regional Advisory Councils and ADF&G Fish and Game Advisory Committees or residents in navigating that process. In addition, during the scoping and review meetings, examples of subsistence harvest data being used by communities to improve regulations will be shared. The regulatory process can be a confusing and difficult one to navigate; partnerships developed through intensive survey efforts in communities have proven to be beneficial to all parties involved, both during the survey but also years after.

Local research assistants (LRAs) will be hired in each community—3 in Pelican, 4 in Tenakee Springs, and 5 in Gustavus. Researchers will train the LRAs in survey administration and mapping, as well as more broadly in the role of ADF&G and the US Forest Service in managing the land and natural resources used

by community residents. The PI will identify key respondents in consultation with the local government and residents.

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<b>Project Number:</b>	22-651
<b>Title:</b>	Estimating inseason harvests of the Klawock River subsistence salmon fishery
<b>Geographic Region:</b>	Southeast Alaska Region
<b>Data Type:</b>	Harvest Monitoring/Traditional Ecological Knowledge
<b>Principal Investigator:</b>	Lauren Sill, ADF&G Division of Subsistence
<b>Co-investigators:</b>	Mary Edenshaw, Klawock Heenya Corporation
<b>Project Cost:</b>	<b>2022:</b> \$12,256 <b>2023:</b> \$46,142 <b>2024:</b> \$33,955 <b>2025:</b> \$57,675 <b>2026:</b> \$27,639
<b>Total Cost:</b>	\$177,667

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**Issue Addressed:** This project responds to the Priority Information Need of “Reliable estimates of subsistence Sockeye Salmon harvest in the Klawock River drainage.” The Klawock Lake stakeholder group recommended a project to estimate inseason subsistence harvests as one of its priorities in its action plan to promote healthy and sustainable sockeye salmon populations in Klawock Lake.

Salmon are one of the most widely used subsistence species on Prince of Wales Island and the Klawock River is a major source of subsistence sockeye salmon. The Klawock River runs through the Tongass National Forest and supports both a state and federal subsistence salmon fishery. The Klawock River sockeye salmon subsistence fishery has significant participation by subsistence users, mostly from the communities of Klawock and Craig, but also from throughout Southeast Alaska. However, the sockeye salmon run in the Klawock River has declined over the past few decades and is significantly smaller than it was historically; the 2013 run had the lowest documented escapement in the last two decades. Based on permit returns, recent subsistence harvests have also declined. Unfortunately, the reasons for the decline are not well understood but could be due to a combination of anthropomorphic and natural causes, such as human population growth of nearby communities and associated infrastructure, logging, and road construction around the lake, as well as hatcheries, all of which have likely made the system particularly vulnerable.

Managers glean information about stock health and abundance through harvest data. Fishing permits are required for both the state and federal fisheries. Fishers must document amounts and locations of fish harvested. Harvest reporting is mandatory; however, the current system has several drawbacks. First, reported harvests on permits are likely low. Concern that the subsistence permit program may underestimate harvests has long been acknowledged, and comparisons of permit data to other sources of harvest data, such as household harvest survey programs, have shown sometimes substantial discrepancies. ADF&G conducted inseason monitoring of the Klawock River fishery such as is being proposed here from 2001 through 2008. During these studies, researchers found that harvests reported on subsistence permits averaged 71% (ranging from 47% to 80%) of the harvest estimated from the inseason monitoring program. Also, harvest amounts from permits are not available to managers until the year following a fishing season; as a result, managers cannot monitor sustainable harvests in season and risk overharvests which may threaten the health of the stock.

**Objectives:** The goal of this project is to provide improved and timely subsistence salmon harvest estimates for the Klawock Lake system and to increase participation in the subsistence salmon permit program. The objectives in pursuit of this goal are to 1) Estimate the subsistence harvest of sockeye and other salmon in the subsistence fishery in Klawock Inlet and the Klawock River estuary in the summers of 2022, 2023, and 2024; 2) Conduct a comparison of permit returns with inseason harvest estimates for each year of the study and compare those results with comparisons made during the previous inseason monitoring project from 2001-2008; and 3) Administer a user survey to measure fishers' experience and perspective on the new on-line system of obtaining subsistence salmon permits and reporting harvest data.

**Methods:** This project will be guided by the research principles adopted by the Alaska Federation of Natives in its Guidelines for Research and by the National Science Foundation, Office of Polar Programs in its Principles for the Conduct of Research in the Arctic, as well as the Alaska confidentiality statute (AS 16.05.815). These principles stress community approval of research designs, informed consent, anonymity of study participants, community review of draft study findings, and the provision of study findings to each study community upon completion of the research.

To meet the goals of the project, researchers will employ inseason creel surveys during the Klawock River subsistence salmon fishery for three consecutive years and a one-time mail-out survey. Researchers will maintain communication with subsistence fishers and the community more broadly throughout the duration of the project through formal meetings and through informal channels.

Objective 1: Researchers will employ voluntary on-site creel surveys of all Klawock River fishers, following the methods and analysis used successfully to estimate subsistence harvests in the Klawock sockeye salmon fishery from 2001-2008. Researchers will hire and train two local residents to conduct the surveys with all fishing parties participating in the subsistence fishery. Survey participation will be voluntary. No identifying information will be recorded during the survey. Researchers will share summarized weekly data with fisheries managers and seasonal summaries with the community.

Objective 2: ADF&G researchers will compare harvest estimates from the creel surveys with estimates from returned permits. Independent sample t-tests will be performed to evaluate whether these two approaches resulted in a statistically significant estimate. The data will also be compared at the household level with Gini coefficients and box and whisker plots to illustrate similarities or differences in the two populations. Researchers will evaluate the results of the permit comparison to the results of the permit comparison done as part of the prior ADF&G inseason harvest monitoring project.

Objective 3: PI Sill will develop a brief survey instrument to address Objective 3. The survey will ask about the respondent's permit status, methods of obtaining a permit, use of the permit, evaluation of the ease of the current permit system, and other comments or concerns about the system. During the first year of the project, ADF&G will mail the survey to all Klawock households (approximately 297 households) and Craig households who have fished the Klawock River in the past 4 years (approximately 40 households), along with an explanatory letter. Klawock Heenya Corporation will post announcements about the survey on the community Facebook page and the survey technicians will have copies of the survey to distribute to active fishers. There will also be an option to fill out the survey online.



**Partnerships and Capacity Building:** Multiple partnerships and the active involvement of community members will strengthen the proposed research. The Division of Subsistence will partner with Klawock Heenya Corporation and Cathy Needham. These partnerships will greatly enhance the research capacity of the project by adding a deeper understanding of Klawock River issues, seeking to integrate tribal members into the research, and providing logistical support. Hiring and training local residents as the inseason surveyors will increase the success of the project as well as help maintain community ownership of the project, develop local capacity, and provide local economic benefits. When all project field work is complete, a review meeting of the project results and a discussion of permit comparisons will occur with fishers.

Local and regional councils can use the information collected through this project to advocate for subsistence practices before the Alaska state Board of Fisheries or Board of Game, or the Federal Subsistence Board. During the planning and implementation phase of the project, researchers will stay in contact with the local councils, and work cooperatively with project partners. During the project, if researchers become aware of issues that could be addressed through the state or federal regulatory processes, researchers can assist the local council, regional association, Advisory Committees, or residents in navigating that process. In addition, during the scoping and review meetings, examples of subsistence harvest data being used by communities to improve regulations will be shared. The regulatory process can be a confusing and difficult one to navigate; partnerships developed through intensive survey efforts in communities have proven to be beneficial to all parties involved, both during the survey but also years after.

## ANNUAL REPORTS

### **Background**

ANILCA established the Annual Reports as the way to bring regional subsistence uses and needs to the Secretaries' attention. The Secretaries delegated this responsibility to the Board. Section 805(c) deference includes matters brought forward in the Annual Report.

The Annual Report provides the Councils an opportunity to address the directors of each of the four Department of Interior agencies and the Department of Agriculture Forest Service in their capacity as members of the Federal Subsistence Board. The Board is required to discuss and reply to each issue in every Annual Report and to take action when within the Board's authority. In many cases, if the issue is outside of the Board's authority, the Board will provide information to the Council on how to contact personnel at the correct agency. As agency directors, the Board members have authority to implement most of the actions which would effect the changes recommended by the Councils, even those not covered in Section 805(c). The Councils are strongly encouraged to take advantage of this opportunity.

### **Report Content**

Both Title VIII Section 805 and 50 CFR §100.11 (Subpart B of the regulations) describe what may be contained in an Annual Report from the councils to the Board. This description includes issues that are not generally addressed by the normal regulatory process:

- an identification of current and anticipated subsistence uses of fish and wildlife populations within the region;
- an evaluation of current and anticipated subsistence needs for fish and wildlife populations from the public lands within the region;
- a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs related to the public lands; and
- recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

Please avoid filler or fluff language that does not specifically raise an issue of concern or information to the Board.

### **Report Clarity**

In order for the Board to adequately respond to each Council's annual report, it is important for the annual report itself to state issues clearly.

- If addressing an existing Board policy, Councils should please state whether there is something unclear about the policy, if there is uncertainty about the reason for the policy, or if the Council needs information on how the policy is applied.
- Council members should discuss in detail at Council meetings the issues for the annual report and assist the Council Coordinator in understanding and stating the issues clearly.

- Council Coordinators and OSM staff should assist the Council members during the meeting in ensuring that the issue is stated clearly.

Thus, if the Councils can be clear about their issues of concern and ensure that the Council Coordinator is relaying them sufficiently, then the Board and OSM staff will endeavor to provide as concise and responsive of a reply as is possible.

### **Report Format**

While no particular format is necessary for the Annual Reports, the report must clearly state the following for each item the Council wants the Board to address:

1. Numbering of the issues,
2. A description of each issue,
3. Whether the Council seeks Board action on the matter and, if so, what action the Council recommends, and
4. As much evidence or explanation as necessary to support the Council's request or statements relating to the item of interest.



**Federal Subsistence Board**  
**1011 East Tudor Road, MS 121**  
**Anchorage, Alaska 99503-6199**



U.S. Fish and Wildlife Service  
Bureau of Land Management  
National Park Service  
Bureau of Indian Affairs

Forest Service

AUGUST 04 2021

OSM 21035.KW

Donald Hernandez, Chair  
Southeast Alaska Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chairman Hernandez:

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

**1. Information Sharing**

***a. Public participation provided for in ANILCA***

*The Council has been concerned with certain public processes over the last few years. Specifically, during the Alaska Roadless Rulemaking (AKRR), the Council has spent a substantial amount of time advocating for the requirements set forth in the National Environmental Protection Act (NEPA) process and ANILCA and requesting that they be followed. The Council wrote several letters to the USDA Forest Service (Forest Service) providing public comment on various stages of AKRR (with copies sent to Board members) and would like to take this opportunity to remind the Board of its attempts to ensure opportunities for public participation during this rulemaking process. The Council addressed these concerns:*

- *Timing of public comment periods*
- *The conduct of subsistence (810) hearings*
- *The obstacles during the rulemaking process that prevent optimum public*

*participation*

- *Participation by local Tribes offering expertise and knowledge of impacts within their traditional territories being disregarded*

*The Council appreciates that the Board helped convey these concerns to the Secretary of Agriculture. In addition to letters, three Council members also requested a hearing on this matter before the Office of Information and Regulatory Affairs, Office of Management and Budget (OMB). At this hearing they provided testimony and presented copies of the Council's public comment letters as supporting materials. A copy of that testimony to OMB is attached for the Board's reference. The Council is dedicated to supporting subsistence users in Southeast by expressing concerns when appropriate and helping the public voice be heard.*

***b. Restrictions on Federally Qualified Subsistence Users***

*The Council is concerned about Federal fishing proposals that suggest more restrictions than those that exist under State regulations. The Council appreciates this Board follows the requirements in ANILCA that provide a preference for harvest opportunity to the Federally qualified subsistence user and that the Board acknowledges that subsistence regulations cannot be more restrictive than other regulated uses of the resource. The Council continues to support the Board in its decisions on the taking of fish and wildlife and is confident that the Board will continue to preserve the Federally qualified subsistence user's priority and protect those users in the future from being the sole group burdened with sacrificing any harvest to conserve fish or wildlife species.*

***c. Lack of Current Data***

*The Council must receive relevant and current information to make appropriate recommendations to the Board. Without current data, the Council is handicapped in making educated decisions. The Council is concerned that some recent analyses feature years-old data and it would like reassurance that the most up-to-date research is being explored for these analyses. The Council requests that all agencies involved in preparing analyses for proposals ensure that the latest scientific data and studies available are being used.*

***d. Individual National Park Service (NPS) Customary and Traditional Use Process***

*The Council appreciated that the Board deferred its action on the proposed delegation of authority to NPS in determining Individual Customary and Traditional (C&T) uses to allow the Regional Advisory Council the opportunity to provide input on this matter. The Council received the information on this proposed process at its fall 2020 meeting.*

*The Council felt that the existing process for determining Individual C&T use is working and does not need to be changed. The area available for individual C&T permits in the Southeast is limited; however, the Council is concerned that the initial proposed changes may enable the NPS to take land use out of the jurisdiction of the Board. Under the existing process, the Regional Advisory Councils and the Board play a role for the approval of C&T use in national parks. If the delegation of authority is granted to the NPS Alaska Regional Director, the Council is concerned that this would narrow authority and reduce advisory capacity. The Council does not wish to see access to subsistence areas denied and subsistence activities further limited or eliminated in national park areas for Federally qualified subsistence users.*

*The Council is pleased to learn that the Board considered the comments received from the Regional Advisory Councils and took action to retain final decision making authority on these determinations and to include a formal recommendation from both the affected Regional Advisory Councils and the affected Subsistence Resource Commissions in this process.*

**Response:**

**a.** Members of the Board uniformly appreciate and thank Council members for their tremendous work to support subsistence users throughout Southeast Alaska. The Board believes the Subsistence Regional Advisory Councils have contributed significantly towards protection of the cultural and traditional uses of subsistence resources for Federally qualified subsistence users since ANILCA was implemented in 1980. The Council's work on the Alaska Roadless Rule Draft Environmental Impact Statement (DEIS) was especially thorough, insightful, and well researched. We recognize the importance and significance of the efforts by all Councils and their members and congratulate you with heartfelt sincerity.

**b.** Thank you for your confidence in the Board and for supporting our decisions. We do the best we can to protect and conserve the fish and wildlife resources in Alaska and to support the ANILCA-mandated subsistence priority for Federally qualified subsistence users who depend on these resources. The Board is committed to continuing to follow ANILCA and to prioritize the needs of Federally qualified subsistence users.

**c.** The Board agrees that up-to-date research, and inventory and monitoring information are essential to managing fish and wildlife resources in Alaska. The Board encourages its members to direct their agencies' staff to conduct essential studies, surveys and monitoring activities, partner whenever and wherever possible, and for staff to use the most up to date information

when analyzing proposals that affect subsistence uses and Federally qualified subsistence users.

**d.** The Board appreciates the Council's comments regarding the individual customary and traditional use determination (individual C&T) process and the complexity of this issue. The goal in proposing modifications to the policy on individual C&T was to provide transparency, expediency, and continuity in making determinations for those with existing patterns of use.

The Board adopted a revised version of the proposed individual C&T process at its January 2021 meeting, after carefully considering feedback that was offered by several Councils and incorporating the recommended modifications. The revised process includes two critical recommendations made by the Councils and Subsistence Resource Commissions (SRC). First, as your Council supported, there is no delegation of authority to the National Park Service (NPS) to make individual C&T determinations. The Board will retain the final decision-making authority. Second, the process now includes a formal recommendation from both the affected Councils and the affected SRC. We are happy to hear your Council is in support of this decision. Perhaps the biggest change is the process is no longer tied to the lengthy biennial regulatory proposal cycle. Instead, the application window is open continuously and once the Councils and SRC have weighed in, the Board will act on the request at its next public meeting. We do not believe there will be more requests resulting from these changes, only that those who do apply will have their requests addressed in a more timely fashion and be able to navigate the intricacies of the application process more easily.

Enclosed are two documents that we hope will better inform your Council on the individual C&T process, and how it has been modified. The first is a one-page overview that compares the former and the newly modified process. The second is the longer Standard Operating Procedure that will be used in making all subsequent individual C&T determinations, until such time that the policy is further modified. Also included in the second document are the procedures that NPS will use in responding to requests for 13.440 subsistence eligibility permits. That process is fully within the purview of NPS, not the Board, though NPS thought that it would be useful to simultaneously clarify and streamline it as well. Though tangentially related, 13.440 permits are not germane to this reply. We invite you to reach out to NPS staff if you have clarifying questions.

In conclusion, the Board believes that it has taken strides to improve the individual C&T process to be transparent, responsive, and consistent. We have incorporated the valuable recommendations and insights of the Councils and SRCs. We hope that the Councils, yours included, will continue to provide recommendations to further improve the policy over time.

## **2. Council supports the community of Hoonah's ability to access Glacier Bay**

*During the Council's discussion on the proposed delegation of authority to NPS (Individual C&T uses) issue, additional discussion took place on the concerns for land management in Glacier Bay. Access to the Glacier Bay National Park (NP) resources for subsistence purposes has been prevented. The local residents are denied the ability to individually harvest gull eggs or gumboots in Glacier Bay NP. In addition, there are no longer any goat or seal subsistence harvests allowed. Many cannot partake in these activities because they cannot produce the required documents showing their historical use of the land, even though many have done so for their entire lives. These activities are a cultural and traditional use of the resources and the Council would like to explore options available to provide access to subsistence users so that they may continue these practices. The Council would like to know what mechanisms are in place or that could be initiated to provide a subsistence opportunity to harvest resources in Glacier Bay NP.*

*Additionally, some subsistence gathering opportunities are prevented by the current regulations that restrict firearms in the NP. Firearms are necessary for subsistence users to harvest and gather in bear-dense areas. Subsistence users no longer utilize some of the most productive areas in Glacier Bay because they are prohibited from carrying firearms for their safety and protection.*

*The Council supports the community of Hoonah's ability to access Glacier Bay NP to harvest subsistence resources. Denying the Huna Tlingit people the ability to practice customary and traditional activities in their traditional territory diminishes or removes their identity. The Council would like to assist the Hoonah community in retaining their cultural identity and asks the Board to identify options for the Council to pursue or share with the Hoonah community. The Council would also like a comprehensive presentation on the permitted subsistence activities in Glacier Bay NP at a future meeting.*

### **Response:**

The Board appreciates the opportunity to respond to the concerns expressed by the Council about the management of resources in Glacier Bay National Park, the traditional Homeland of the Huna Tlingit.

We recognize that Glacier Bay National Park is encompassed by the traditional territory of the clans now represented by the Hoonah Indian Association (HIA, a Federally recognized tribe) and the area's rich abundance supported the Huna Tlingit for generations. Although certain laws and



Chairman Hernandez

regulations do not allow for all traditional harvest activities to occur, the NPS and HIA are committed to working collaboratively to explore options that support a range of traditional uses.

Glacier Bay National Monument was established in 1925 under the Antiquities Act and later expanded in 1980 under the Alaska National Interest Lands Conservation Act (ANILCA). ANILCA's Title VIII provisions for subsistence do not apply to those parks, or portions of parks, established prior to the Act's passage. Thus, subsistence is not authorized in Glacier Bay National Park, although it is allowed in the Preserve, Dry Bay. The NPS does not have the prerogative of allowing subsistence activities in pre-ANILCA parks, including Glacier Bay; an Act of Congress would be required to alter ANILCA regulations. Of note, the Hoonah Indian Association submitted written opposition to congressional efforts in 1999 and 2000 aimed at authorizing subsistence in Glacier Bay, expressing concerns that it would diminish the Tribe's exclusive rights to traditional resources in Homeland. To our knowledge, the Hoonah Indian Association has not altered their position regarding subsistence.

Given that subsistence is not authorized in Glacier Bay, the HIA has worked collaboratively with the NPS to identify and address a wide range of traditional needs using other mechanisms. Beginning in 1997, following a meeting with Tribal elders, NPS and HIA agreed to prioritize critical traditional resource harvest needs and seek creative solutions where feasible.

For example, elders prioritized the harvest of glaucous-winged gull eggs as a critical traditional food source. The Tribe and NPS partnered to collect biological and ethnographic information which informed planning efforts. Tribal members now harvest gull eggs in the park through a Tribal harvest plan following legislation (Public Law 113-142, The Huna Tlingit Traditional Gull Egg Use Act) and required NEPA analysis. Similarly, NPS conducted an ethnographic study of traditional seal harvest in the park to document the practice and inform any future discussions about potential seal harvest.

Berry picking<sup>1</sup>, an important cultural tradition for Huna Tlingit, occurs throughout the park during the summer months, often jointly sponsored through NPS and HIA Journey to Homeland trips. Families also harvest berries and other resources on their own. Tribal members continue to harvest intertidal species (primarily chiton), seaweed, and some species of salmon under State of

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<sup>1</sup> 36 CFR § 13.35 Preservation of natural features.

- (c) Gathering or collecting, by hand and for personal use only, of the following renewable resources is permitted -
- (1) Natural plant food items, including fruits, berries and mushrooms, but not including threatened or endangered species;
  - (2) Driftwood and uninhabited seashells;
  - (3) Such plant materials and minerals as are essential to the conduct of traditional ceremonies by Native Americans; and
  - (4) Dead wood on the ground for use as fuel for campfires within the park area.

Alaska sport fishing regulations. Tribal members also harvest salmon and halibut under personal use fishery permits issued by the State of Alaska. To facilitate these activities, the NPS issues local vessel entry permits to Hoonah residents. NPS and HIA are also currently pursuing cultural fisheries options for various traditional fishing locations including Chookanhéeni (Berg Bay), where partners are planning a culture camp. Importantly, the NPS and HIA are also consulting on vegetation gathering needs, now permitted under the 2016 authorized rule (Gathering of Certain Plants or Plant Parts by Federally Recognized Indian Tribes for Traditional Purposes).

NPS does not require that Tribal members visiting Homeland or participating in traditional activities within the Park provide documentation of historical use. The only instance where historical documentation was required was for those individuals applying for lifetime access permits for commercial fishing within Park waters.

Since 2010, Individuals have been authorized to possess firearms in NPS areas in accordance with applicable State and Federal law although the laws regarding discharge of firearms remain unchanged. The NPS understands that many Tlingit prefer to carry firearms for protection against bears while harvesting; they are free to do so. Should a firearm be discharged in the Park, the incident would be investigated, but if the discharge was associated with protecting life, no legal action would be taken. There is no exemption for protection of property. Importantly, studies by the NPS and others have shown that bear spray is often more effective in preventing bear attacks than firearms. All Glacier Bay field employees utilize bear spray or tasers rather than firearms and many younger Hoonah residents appear to be comfortable doing the same. The NPS understands that the enduring connection between the Huna Tlingit and their Homeland in Glacier Bay is vital not only to the cultural identity of the Huna Tlingit, but also to the resources and values of the Park. The NPS incorporates Homeland concepts in all its planning efforts including the recently completed Frontcountry Management Plan and the pending Backcountry Management Plan. The NPS must manage the Park in accordance with ANILCA, and an array of other Federal laws, regulations, and policy, but remains committed to partnering with the Tribal government and other Tribal entities to develop creative approaches which provide meaningful opportunities for Homeland connections. The NPS would be pleased to present more detailed information about the traditional activities that occur in the Park and would be happy to answer any questions the Council might have.

### **3. Council Vacancies**

*The Council remains extremely disappointed that there are vacant seats on the Council in recent years. These vacancies have detracted from the Council's ability to perform its work effectively.*

*During the 2020 appointment cycle, the Council received appointments approximately one week*

Chairman Hernandez

*before its winter 2021 meeting (these appointments should have been made prior to the expiration of terms on December 2, 2020). By the time appointments were received a substantial amount of preparatory work and effort had already gone into mitigating the difficulties created by the lack of Council appointments. An Acting Chair needed to be acclimated to leading a meeting with complex and sensitive issues. A lot of strategizing needed to be done to ensure that a group of five Council members could do the work of a 13-member Council.*

*The Council is now almost fully seated (12 of 13 seats filled); however, based on the last few years' appointment process experiences, the Council is concerned that this vacancy trend could continue. The Council also continues to be concerned with the June 14, 2019 Executive Order Evaluating and Improving the Utility of Federal Advisory Committees, and its impacts on the Federal Subsistence Management Program (Program) and Regional Advisory Councils. For these reasons, the Council reiterates its concern for the loss of crucial representation in past years across the Southeast Alaska Region as noted in its FY 2019 Annual Report. The lack of appropriate diversity on the Council created significant challenges for the Council members who were asked to make decisions affecting areas and groups in the absence of a local member who can best represent the citizenry of their community.*

*All vacant seats must be filled, every year, for the Council to function properly and efficiently. Applicants to Regional Advisory Councils are screened and vetted with specific criteria to ensure that well-informed residents of the regions are appointed. Individuals selected have significant knowledge of ANILCA, regional experiences with a wide range of subsistence resources, and share their traditional ecological knowledge about fish and wildlife resources. Experienced members have institutional knowledge of subsistence uses in their local area, which is vital to fully comprehend issues that arise. The lack of Council member appointments and the resulting loss of useful and historical knowledge have detrimentally affected the Program and vacant seats on any Regional Advisory Council are contrary to the Program's objectives.*

*In the Board's FY 2019 Annual Report reply regarding Council vacancies subject, the Board encouraged the Council to "expand its outreach effort in its communities and throughout the Region to attract a wider pool of applicants, if the Council wishes to see all seats filled." The Council does not believe that outreach is the issue. Twelve applications were received to fill 7 vacancies for the December 2019 appointments, yet four seats remained unfilled. Ten applications were received to fill 8 vacant seats for the December 2020 appointments, yet no appointments were made for months, leaving only four members and an Acting Chair to cover the Council's business (including the January 2021 Board regulatory meeting).*

*The Council respectfully makes a second request that the Board send a letter to the newly appointed Secretaries of Interior and Agriculture advising them of the substantial impacts these*

*Council membership reductions have had on the work of the Councils; that these Councils are provided for under ANILCA; and that a lack of representation on the Councils is detrimental to the intent of ANILCA.*

*Lastly, the Council requests a legal analysis of the failure to appoint Council members to the Subsistence Regional Advisory Councils for the last three years and whether provisions of the Federal Advisory Committee Act or ANILCA have been violated. The Council wants to be prepared. It appreciates the recent appointments to its Council; however, the Council does not want to be complacent and assume that this issue will not be suffered for yet another appointment cycle.*

**Response:**

The Board fully understands the Council's concerns regarding the need to have diverse and wide regional representation on the Council, and to have all of the vacant seats filled in as timely a manner as possible. The Board wants to point out to the Council that the current administration already is aware of the significance and magnitude of the appointment issues. When in 2021 the lack of appointments was brought to this administration's attention, it acted promptly to resolve the issue by appointing additional members to the Councils out-of-cycle. The Board believes that since the issue was resolved so expeditiously it is not necessary at this point to write a letter to the Secretaries of the Interior and Agriculture on the Councils' appointments concerns.

Additionally, the Board wants to alleviate the Council's concerns regarding Executive Order #13875 on *Evaluating and Improving the Utility of Federal Advisory Committees*, dated June 14, 2019. On January 20, 2021, President Biden revoked Executive Order #13875 by issuing new Executive Order #13992. The following is a link to the new Executive Order #13992: <https://www.federalregister.gov/documents/2021/01/25/2021-01767/revocation-of-certain-executive-orders-concerning-federal-regulation>. Specifically, Executive Order #13992 states, "It is the policy of my Administration to use available tools to confront the urgent challenges facing the Nation, including the coronavirus disease 2019 (COVID-19) pandemic, economic recovery, racial justice, and climate change. To tackle these challenges effectively, executive departments and agencies (agencies) must be equipped with the flexibility to use robust regulatory action to address national priorities. This order revokes harmful policies and directives that threaten to frustrate the Federal Government's ability to confront these problems, and empowers agencies to use appropriate regulatory tools to achieve these goals."

The Board continues to encourage the Council to assist the Office of Subsistence Management (OSM) with outreach efforts in its communities and throughout the Region to attract a wider pool of applicants for the future appointment cycles. Having a wider pool of applicants allows

the Board to choose the most qualified individuals for appointment recommendations and to ensure that most or all seats are filled. However, it is important to remind the Council that the Board does not have final authority over which recommended applicants are appointed to the Councils. After the Board submits its annual appointment recommendations, the final appointment authority rests with the Secretary of the Interior.

The Board wants to assure the Council that OSM will continue working with the Department of the Interior to ensure that the 2021 cycle appointments stay on schedule and that the work is done in the most efficient manner possible. The Board has a high level of confidence that in the future the Council's appointments will be made in a timely manner.

#### **4. Staff Support for Regional Advisory Council Meetings**

*This Council has expressed its concern regarding the limited participation by staff in its annual report to the Board for the last two years. The Council has routinely experienced negative impacts on its ability to effectively conduct its business because of the absence of in-person participation by staff (pre-COVID-19). The Council would like a commitment to have its previous level of staff support restored. Due to the complexity of land management in Southeast, especially given the amount of Forest Service projects that have the propensity to substantially impact subsistence resources, it is imperative that the biologists situated in these geographic areas of interest, be permitted to attend meetings and fully engage with Council members.*

*The Council understands the need for virtual meetings at present, due to COVID-19, but would like to express its frustration for the lack of in-person support these past few years. Some area biologists have not been able to participate or even listen to the Council meetings. The Council has customarily relied on local biologists in the past for their insight and knowledge of fish and wildlife species and land uses. During the meetings and through individual conversations with these biologists, Council members receive important, detailed information. The Council finds this expert information invaluable when recommending effective solutions to problems facing subsistence users. The strength of the program's support is how the staff understand the people, places, and animals of their local areas and share that knowledge with the Council.*

*This Council tackles a large volume of information at each meeting and the Council was most effective when it received **in-person** assistance. When all staff are in the room, they can quickly delegate crucial tasks to one another while the Council discusses issues. For instance, it is key to have someone help navigate regulations while another staff member presents information to the Council and another staff member is capturing notes and follow-up requests, and maybe yet another is looking at State regulations for comparison purposes. This coordination of real-time support is invaluable to the Council and this level of service is very important to efficiently*

*conduct business. Therefore, when conditions allow, the Council respectfully asks that the quantity of in-person staff support at its meetings be restored to at or near a level experienced prior to 2017 to ensure that the Council timely meets its obligations to provide well-informed recommendations.*

**Response:**

The Board recognizes that in-person meetings are preferred by and are more effective for everyone involved in the management of subsistence resources and for providing a priority to Federally qualified subsistence users to be able to continue to practice a subsistence way of life. We will encourage leadership and field staff alike to participate in the Council meetings as much as possible. Specifically, in reference to the Southeast Region, Alaska Regional Forester Dave Schmid understands the Council's desire for additional staff support to be present at future Council meetings. All Board members hope the pandemic will be under control by this fall and that it will be possible for everyone to meet together again in person.

**5. Reasonable Access to Resources in an Emergency**

*The Council would like to be advised on the status of the current 'food security special action request' protocol which was developed in 2020 to process requests from communities attempting to secure local food resources in difficult times. It is understood that the steps previously used to process these requests are, or have been, modified. It is important to know what options are available for relief, should another food security emergency take place in the future.*

*In addition, the Council would like to receive the information on the following:*

- a. **What options are available for allowing access to resources in a reasonable manner in times of emergency?** When an emergency is declared, reasonable access should be granted to local subsistence resources to make food security a priority. Needs must be met during a time where the availability of food is uncertain.*
- b. **Is there a mechanism available or that can be created that would be implemented when an emergency is declared for subsistence users who do not have access to substantial food resources?** A defined method should be in place that would provide timely access to resources in rural communities where the population does not have access to grocery store food sources. In Southeast Alaska, if ferries stop running between islands, the communities are plunged into a dire situation to obtain food. There should be a quicker procedure than the current special action request process to provide emergency nourishment relief.*

**Response:**

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

The Federal Subsistence Management Program can support adaptation to changing conditions by using the various tools available that enable the program to be responsive to subsistence users' needs as conditions change. For example, the Special Action process enables the Board to respond quickly to out-of-cycle needs for regulatory actions. The Board has also used its authority to delegate authority to local land managers to enable managers to respond quickly to unforeseen circumstances such as unpredictable seasons and fluctuations in resource availability.

More persistent changes to the availability and seasonality of resources due to climate change can be accommodated through the regulatory process. When species become less abundant due to climate change, closures to non-Federally qualified subsistence users, or ANILCA section 804 prioritizations among Federally qualified subsistence users, may become necessary.<sup>2</sup> Other species may become more abundant with shifts in environmental conditions, or new species may expand into the Southeast Alaska region. In this case, the Federal Subsistence Management Program can assist communities in delineating seasons, harvest limits, and methods and means for these newly available resources.

As you may know, the Board's decision in 2020 to delegate its authority to local land managers so as to allow them to respond quickly to Covid-19 related food security issues is currently the subject of a legal challenge in Federal District Court. The case, which is entitled *State of Alaska v. Federal Subsistence Board et al.*, 3:20-cv-00195-SLG (D. Alaska), remains unresolved at this time. Briefing will be complete later this summer, which means that we expect a decision sometime in the fall. If the Board ultimately prevails in the litigation, then its authority to issue such delegations and the Federal program's ability to respond quickly during crises that potentially impact the health and safety of rural Alaskans will remain unchanged.

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<sup>2</sup> "Such priority shall be implemented through appropriate limitations based on the application of the following criteria: (1) customary and direct dependence upon the populations as the mainstay of livelihood; (2) local residency; and (3) the availability of alternative resources." (ANILCA, Section 804).

## **6. Status of Fish and Wildlife Resources in Southeast**

*Pursuant to ANILCA Title VIII Section 805, this Council recognizes the importance of providing the Board with regional information so that it can make informed regulatory decisions. This Council hereby continues to routinely report on the status of fish and wildlife populations and the harvests within the region by enclosing the reported harvest of subsistence resources in southeast Alaska. (Please see attached population and harvest information on fish and wildlife resources.)*

### **Response:**

Thank you very much for providing us with the most current demographic information on fish and wildlife populations and subsistence harvest in Southeast Alaska. As your Council indicated in topic number 4 of your FY-20 Annual Report, having up-to-date research, and inventory and monitoring information is crucial for successful fish and wildlife conservation and management, as well as to continue meeting the ANILCA-mandated priority for subsistence uses by Federally qualified subsistence users on Federal public lands and waters of Alaska.

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

Sincerely,



Anthony Christianson  
Chair

### Enclosures

cc: Southeast Alaska Subsistence Regional Advisory Council  
Federal Subsistence Board  
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management  
Amee Howard, Deputy Assistant Regional Director, Office of Subsistence Management  
Robbin La Vine, Subsistence Policy Coordinator, Office of Subsistence Management  
Katerina Wessels, Council Coordination Division Supervisor  
Office of Subsistence Management



Lisa Grediagin, Wildlife Division Supervisor, Office of Subsistence Management  
George Pappas, State Subsistence Liaison and Acting Fisheries Division Supervisor  
Office of Subsistence Management

Jonathan Vickers, Anthropology Division Supervisor, Office of Subsistence Management  
DeAnna Perry, Council Coordinator, United States Forest Service  
Interagency Staff Committee

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Project Coordinator, Alaska Department of Fish and Game  
Administrative Record

## **Standard Operating Procedures for Issuance of Subsistence Eligibility Permits and Individual Customary and Traditional Use Determinations<sup>1</sup>**

The Alaska Region of the National Park Service (NPS) issues National Park/Monument Subsistence Eligibility Permits (sometimes referred to as 13.440 Permits) and Individual Customary and Traditional Use Determinations using the protocol established in this document. A Subsistence Eligibility Permit may be requested for use in conjunction with an existing community or area customary and traditional (C&T) use determination within the relevant park unit, or in combination with a new request for one or more individual C&T use determinations.

National Park/Monument Subsistence Eligibility Permits are issued pursuant to 36 Code of Federal Regulations (CFR) 13.440:

Any rural resident whose primary, permanent home is outside the boundaries of a resident zone of a national park or monument may apply to the appropriate Superintendent pursuant to the procedures set forth in §13.495 for a subsistence permit authorizing the permit applicant to engage in subsistence uses within the national park or monument.

Application procedures for Subsistence Eligibility Permits are specified in 36 CFR 13.495:

(a) Any person applying for the subsistence permit required by §13.440(a), or the exception to the prohibition on aircraft use provided by §13.450(b)(2), shall submit his/her application to the Superintendent of the appropriate national park or monument. If the applicant is unable or does not wish to submit the application in written form, the Superintendent shall provide the applicant an opportunity to present the application orally and shall keep a record of such oral application. Each application must include a statement which acknowledges that providing false information in support of the application is a violation of Section 1001 of Title 18 of the United States Code, and additional statements or documentation which demonstrates that the applicant satisfies the criteria set forth in §13.440(a) for a subsistence permit or §13.450(b)(2) for the aircraft exception, as appropriate. Except in extraordinary cases for good cause shown, the Superintendent shall decide whether to grant or deny the application in a timely manner not to exceed forty-five (45) days following the receipt of the completed application. Should the Superintendent deny the application, he/she shall include in the decision a statement of the reasons for the denial and shall promptly forward a copy to the applicant.

(b) An applicant whose application has been denied by the Superintendent has the right to have his/her application reconsidered by the Alaska Regional Director by contacting the Regional Director within 180 days of the issuance of the denial. The Regional Director may extend the

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<sup>1</sup> To comply with requirements of the National Environmental Policy Act (NEPA), parks should consider covering the federal action of determining individual eligibility for subsistence activities with categorical exclusion 3.2(N): Issuance of individual hunting and/or fishing licenses in accordance with state and federal regulations. This CE does not require documentation.

180-day time limit to initiate a reconsideration for good cause shown by the applicant. For purposes of reconsideration, the applicant shall present the following information:

- (1) Any statement or documentation, in addition to that included in the initial application, which demonstrates that the applicant satisfies the criteria set forth in paragraph (a) of this section;
- (2) The basis for the applicant's disagreement with the Superintendent's findings and conclusions; and
- (3) Whether or not the applicant requests an informal hearing before the Regional Director.

(c) The Regional Director shall provide a hearing if requested by the applicant. After consideration of the written materials and oral hearing, if any, and within a reasonable period of time, the Regional Director shall affirm, reverse, or modify the denial of the Superintendent and shall set forth in writing the basis for the decision. A copy of the decision shall be forwarded promptly to the applicant and shall constitute final agency action.

Individual Customary and Traditional Use Determinations are made pursuant to 50 CFR 100.16:

- (a) The Board shall determine which fish stocks and wildlife populations have been customarily and traditionally used for subsistence. These determinations shall identify the specific community's or area's use of specific fish stocks and wildlife populations. For areas managed by the National Park Service, where subsistence uses are allowed, the determinations may be made on an individual basis.

and 50 CFR 100. 24:

The Federal Subsistence Board has determined that rural Alaska residents of the listed communities, areas, and individuals have customary and traditional use of the specified species on Federal public land in the specified areas. Persons granted individual customary and traditional use determinations will be notified in writing by the Board. The Fish & Wildlife Service and the local NPS Superintendent will maintain the list of individuals having customary and traditional use on National Parks and Monuments. A copy of the list is available upon request. When there is a determination for specific communities or areas of residence in a Unit, all other communities not listed for that species in that Unit have no Federal subsistence priority for that species in that Unit. If no determination has been made for a species in a Unit, all rural Alaska residents are eligible to harvest fish or wildlife under this part.

### **Request for a National Park/Monument Subsistence Eligibility Permit**

1. Applicants may request applications from the relevant park Subsistence Coordinator verbally, in-person, or in writing. The applicant may choose to complete the application with the assistance of the Subsistence Coordinator. Applicants shall acknowledge to the Subsistence Coordinator, either by signing and returning the application, verbally, or both, that he/she understands that providing false information in support of the application is a violation of Section 1001 of Title 18 of the United States Code.
2. The Subsistence Coordinator shall forward a copy of completed applications to the Alaska Region Subsistence Program Manager for archival purposes and entry in the Subsistence Eligibility Permit / Individual C&T tracking log.
3. Upon receiving the completed application, the relevant park Subsistence Coordinator shall schedule an interview with the applicant, either in-person or by phone, to obtain additional information regarding applicant eligibility and existing patterns of subsistence use.
4. Upon completing the interview, the relevant Subsistence Coordinator shall produce a brief written analysis (see attached form) and formulate a recommendation on the request, with justification.
5. The application, analysis, and recommendation shall be forwarded by the relevant Subsistence Coordinator to the Superintendent for review and decision. The Superintendent shall complete the decision form (see attached).
6. A signed copy of the decision form shall be sent to the applicant within 45 days of the receipt of the application<sup>2</sup> (36 CFR 13.495). The Subsistence Coordinator will coordinate with the applicant and the Superintendent to issue an approved permit with requisite signatures and he/she shall retain a copy. Permits shall follow the standard format for NPS Special Use Permits. The following permit stipulations are recommended, as applicable to the specific park unit, in addition to the standard Special Use Permit stipulations:
  - a. This permit establishes eligibility only for subsistence uses within (National Park or Monument Name). Specific subsistence activities (i.e. house logs, green firewood, cabins, subsistence registration hunts, caches, etc.) may require separate authorization or permits.
  - b. The Permittee must contact the Superintendent if permittee changes his/her permanent residence. The permit may need to be amended to show the current physical address of the permanent residence.
  - c. This permit is void if the Permittee's permanent residence is determined to be "non-rural" by federal regulation.
  - d. The Permittee is subject to other regulatory requirements including, but not limited to, seasons and harvest limits, community and individual customary and traditional determinations, methods and means, etc.
  - e. Only those family members living within the Permittee's household are authorized by this permit for subsistence uses in (National Park or Monument Name). It is the responsibility of the Permittee to notify the Superintendent of changes in the

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<sup>2</sup> Except in extraordinary cases for good cause shown (36 CFR 13.495), including the need to collect additional information.

composition of the household, including additions (through birth, adoption or marriage) or deletions (a family member moving out of the household).

- f. The Permittee is prohibited by federal regulations (36 CFR 13.450) from using aircraft to access the park for the purpose of engaging in subsistence activities. Aircraft access is prohibited for any portion of the access. The regulatory prohibition on aircraft access for subsistence uses in the park does not apply to aircraft access to the Permittee's primary permanent residence.
7. The recommendation, Superintendent decision, and a digital copy of the signed permit (when applicable) shall be forwarded to the Alaska Region Subsistence Program Manager for entry into the Subsistence Eligibility Permit / Individual C&T tracking log.
8. Pursuant to 36 CFR 13.495 (b) an applicant whose application has been denied by the Superintendent has the right to have his/her application reconsidered by the Alaska Regional Director by contacting the Regional Director within 180 days of the issuance of the denial. The Regional Director may extend the 180-day time limit to initiate a reconsideration for good cause shown by the applicant.

Note: Permits will be issued for the lifetime of the applicant so long as they retain their eligibility as a Federally qualified subsistence user. Reviews of permit eligibility shall be made periodically by the Subsistence Coordinator, at least every five years.

### **Request for an Individual C&T Use Determination**

1. Applicants may request applications from the relevant park Subsistence Coordinator verbally, in-person, or in writing. The applicant may choose to complete the application with the assistance of the Subsistence Coordinator. Applicants shall acknowledge to the Subsistence Coordinator, either by signing and returning the application, verbally, or both, that he/she understands that providing false information in support of the application is a violation of Section 1001 of Title 18 of the United States Code.
2. The Subsistence Coordinator shall forward a copy of completed applications to the Alaska Region Subsistence Program Manager for archival purposes and entry in the Subsistence Eligibility Permit / Individual C&T tracking log.
3. Upon receiving the completed application, the relevant park Subsistence Coordinator shall schedule an interview, either in-person or by phone, to obtain additional information regarding applicant eligibility and existing patterns of subsistence use.
4. The relevant Subsistence Coordinator will analyze responses on the application and in the interview to assess eligibility and to formulate a recommendation on an existing pattern of use of species requested for an individual C&T use determination.
5. The written analysis and recommendation, with justification (see attached form), shall be sent to the Alaska Region Subsistence Program Manager for archival purposes and entry in the Subsistence Eligibility Permit / individual C&T tracking log. Analyses shall follow the guidance for C&T use determination analyses in the most recent revision of the Federal Subsistence Management Program's Technical Writing Guide, as applicable to individual C&T use determinations.
6. A summary of the request and analysis will be provided by the relevant NPS Subsistence Coordinator to the affected Subsistence Regional Advisory Council (RAC) or Councils and the affected Subsistence Resource Commission (SRC) at their first meeting following completion of the interview. The RAC(s) and SRC will make recommendations, with justification, on issuance of the individual C&T use determination (see attached decision form).
7. The Regional Council Coordinator(s) and park Subsistence Coordinator shall forward the RAC and SRC recommendations and justifications to the Alaska Region Subsistence Program Manager for archival purposes and entry into the Subsistence Eligibility Permit / Individual C&T tracking log.
8. The Alaska Region Subsistence Program Manager will provide the individual C&T use determination application, analysis, and recommendations to the Office of Subsistence Management to facilitate Board deliberation at the Board's next public meeting.
9. The Office of Subsistence Management will draft a decision letter on behalf of the Federal Subsistence Board. The Board Chair will review and sign the letter, which will be digitized, archived, and forwarded to the applicant, with copies to the NPS Alaska Region Subsistence Program Manager, the relevant park Subsistence Coordinator, and the park Superintendent.
10. The Office of Subsistence Management will forward the decision letter to the chairs of the affected Regional Advisory Councils. Councils will be informed of any changes to individual C&Ts at the council's next regularly scheduled public meeting. The park Subsistence Coordinator will inform the SRC of the decision.

**U.S. DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE  
ALASKA REGION**

**NATIONAL PARK/MONUMENT SUBSISTENCE ELIGIBILITY PERMIT\* & INDIVIDUAL CUSTOMARY  
AND TRADITIONAL USE DETERMINATION APPLICATION**

*(\*For determination of subsistence eligibility under the provisions of 36 CFR 13.440.)*

I am requesting (Choose One):

- National Park/Monument Subsistence Eligibility Permit ONLY
- Individual Customary and Traditional Use Determination ONLY<sup>3</sup>
- National Park/Monument Subsistence Eligibility Permit AND Individual Customary and Traditional Use Determination

If requesting a National Park/Monument Subsistence Eligibility Permit, my eligibility is based on:

- A pattern of subsistence use in the park unit for which I am seeking a permit
- A pattern of subsistence use in a park OTHER THAN the park unit for which I am seeking a permit
  - Please explain: \_\_\_\_\_

If requesting an individual customary and traditional use determination, for what species and areas (units or subunits)?

\_\_\_\_\_

Name of National Park or Monument: \_\_\_\_\_

1. Name of applicant (First, Middle, Last):

\_\_\_\_\_

<sup>3</sup> The Federal Subsistence Board (FSB) policy requires applicants for Individual Customary and Traditional Use Determinations to either reside in a resident zone community or hold a 13.440 Subsistence Eligibility Permit. This permit can be applied for concurrently.

2. Mailing address:

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3. Location/physical address of primary permanent residence:

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- Phone number: \_\_\_\_\_

-Email address: \_\_\_\_\_

- What month and year did your residence at this location start?

Month \_\_\_\_\_ Year \_\_\_\_\_

- During what part of the year do you reside at this residence (give dates)? \_\_\_\_\_

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4. Location/physical address of other residences, if any:

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- During what part of the year do you reside at these residences (give dates)?

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5. What physical address is currently indicated on your:

- Alaska hunting and/or fishing license

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- Driver's license

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- Tax returns

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- Voter registration

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- Alaska Permanent Fund Dividend application

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6. Have you, or any persons living in your household on a permanent basis, engaged in subsistence within this park or monument? Yes \_\_\_\_ No \_\_\_\_

- Specific location of use? \_\_\_\_\_

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- Was aircraft used as a means of access to conduct such activities? Yes \_\_\_\_ No \_\_\_\_

- Type of subsistence use (hunting, trapping, fishing, gathering, etc.)? \_\_\_\_\_

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- Specific resources harvested (caribou, moose, salmon, furbearers, timber, etc.)? \_\_\_\_\_

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- Name of permanent member(s) of household who has hunted, trapped, fished, gathered, etc. in the park or monument? \_\_\_\_\_

- Relationship of permanent member(s) of household noted above to you (self, father, mother, brother, etc.)? \_\_\_\_\_

- Earliest year in which use took place? \_\_\_\_\_

- Most recent year in which use took place? \_\_\_\_\_

- Frequency of use (yearly, every other year, etc.)? \_\_\_\_\_

7. Other comments/additional pertinent information in support of your permit application:

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**COMPLETE THE FOLLOWING ONLY IF REQUESTING INDIVIDUAL CUSTOMARY AND TRADITIONAL USE DETERMINATION(S)**

1. For what species are you requesting an individual customary and traditional use determination?

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2. Please describe your pattern of subsistence use of the species listed above. What years have you harvested or attempted to harvest them? In which months or seasons do you harvest them?

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3. What methods and means of harvest do you use for these species?

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4. Where do you harvest these resources? Please provide locations, as specifically as possible, including identifiable landmarks or geographic descriptions. How do you access these harvest locations? What means of transportation do you use?

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5. How do you process these resources and preserve them for future use?

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6. How have you learned about hunting, trapping and fishing – both skills and the values associated with the uses?

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7. Do you share what you know about hunting, trapping and fishing with others? If so, how?

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8. Do you share the resources that you harvest with others in your community or family? Please describe any sharing networks in which you are involved.

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9. Please describe your pattern of subsistence use more generally – which resources do you harvest or seek to harvest on a regular basis? What role do these resources and activities play in your way of life – economically, nutritionally, culturally, socially?

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**TO BE COMPLETED BY ALL APPLICANTS**

1. Please provide the name, address and telephone number of another person, other than a member of your household, who can verify this information:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I also understand that Title 18 U.S.C § 1001 makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious, or fraudulent statements as to any matter within its jurisdiction.

Signature of applicant: \_\_\_\_\_

Date: \_\_\_\_\_

**U.S. DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE  
ALASKA REGION**

**NATIONAL PARK/MONUMENT SUBSISTENCE ELIGIBILITY PERMIT\* & INDIVIDUAL CUSTOMARY  
AND TRADITIONAL USE DETERMINATION ANALYSIS**

*(\*For determination of subsistence eligibility under the provisions of 36 CFR 13.440.)*

To be completed by the relevant Subsistence Coordinator:

Date:

Applicant Name:

Analyst Name:

This analysis is in response to the following request (Choose One):

- Subsistence Eligibility Permit ONLY
- Individual Customary and Traditional Use Determination ONLY
- Subsistence Eligibility Permit AND Individual Customary and Traditional Use Determination

Please type a brief summary of the applicant's reported subsistence use pertaining to the request, as determined from information provided on the application and during the interview:

For a National Park/Monument Subsistence Eligibility Permit, the analysis should address the following topics:

1. Synopsis of the applicant's pattern of use<sup>4</sup> specifically in the national park or monument for which the permit is requested, including the following:
  - a. Species harvested,
  - b. Specific locations where the use occurred,
  - c. Years during which the subsistence uses took place, and
  - d. Whether aircraft was used for access.
2. Does the pattern of use begin prior to the signing of the Alaska National Interest Lands Conservation Act (ANILCA)?

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<sup>4</sup> There may be variation by region and/or park on what constitutes a "pattern of use." Generally, there should exist evidence of repeated past attempts to access and harvest subsistence resources within the boundaries of the park or monument. SRCs may be consulted in defining a "pattern of use" for their region.

3. Does the applicant have a pattern of use established while as a resident of a resident zone community after the passage of ANILCA?

For an Individual C&T use determination, the analysis should address the following questions:

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

The analysis should include an integrated discussion of the eight factors. A factor-by-factor discussion is not required in the analysis and it is also not necessary that all eight factors be addressed to demonstrate a pattern of use. The eight factors provide a framework for examining the pattern of use of a resource. There are regional, cultural and temporal variations and the application of the eight factors will likely vary by region and by resource depending on actual patterns of use. The goal of customary and traditional use determination analyses is to recognize customary and traditional uses in the most inclusive manner possible.

As a result of this analysis (Select All that Apply):

- There is substantial evidence to support the issuance of a Subsistence Eligibility Permit
- There is substantial evidence to support the issuance of an Individual Customary and Traditional Use Determination for (species and location) \_\_\_\_\_



- There is **NOT** substantial evidence to support the issuance a Subsistence Eligibility Permit
- There is **NOT** substantial evidence to support the issuance an Individual Customary and Traditional Use Determination for (species and location) \_\_\_\_\_

Brief Justification:

Signature of Analyst: \_\_\_\_\_ Date: \_\_\_\_\_

**U.S. DEPARTMENT OF THE INTERIOR**

**NATIONAL PARK SERVICE**

**ALASKA REGION**

**SUBSISTENCE ELIGIBILITY PERMIT\* DECISION**

*(\*For determination of subsistence eligibility under the provisions of 36 CFR 13.440.)*

To be completed by the relevant Superintendent:

Applicant Name:

Name of Park or Monument for which permit is requested:

Request Date:

After reviewing the request, evaluation form, staff analysis and recommendation, I have decided to (select one):

- Issue a Subsistence Eligibility Permit to the applicant
- Deny a Subsistence Eligibility Permit to the applicant

Superintendent Signature: \_\_\_\_\_ Date: \_\_\_\_\_

NOTE: Pursuant to 36 CFR 13.495 (b) an applicant whose application has been denied by the Superintendent has the right to have his/her application reconsidered by the Alaska Regional Director by contacting the Regional Director within 180 days of the issuance of the denial. The Regional Director may extend the 180-day time limit to initiate a reconsideration for good cause shown by the applicant.

**U.S. DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE  
ALASKA REGION**

**INDIVIDUAL CUSTOMARY AND TRADITIONAL USE DETERMINATION  
RAC RECOMMENDATION**

To be completed by the relevant Subsistence Coordinator:

Date of Formal Action:

Proponent Name:

Proponent Request:

Affected RAC:

This RAC has determined that (select all that apply):

- There is sufficient evidence to support an individual customary and traditional use determination for (name) for (species) in (unit(s)/subunit(s))
- There is NOT sufficient evidence to support an individual customary and traditional use determination for (name) for (species) in (unit(s)/subunit(s))

Brief justification for above decision:

Signature of RAC Chair or Designee \_\_\_\_\_

Date \_\_\_\_\_

**U.S. DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE  
ALASKA REGION**

**INDIVIDUAL CUSTOMARY AND TRADITIONAL USE DETERMINATION**

**SRC RECOMMENDATION**

To be completed by the relevant Subsistence Coordinator:

Date of Formal Action:

Proponent Name:

Proponent Request:

Affected SRC:

This SRC has determined that (select all that apply):

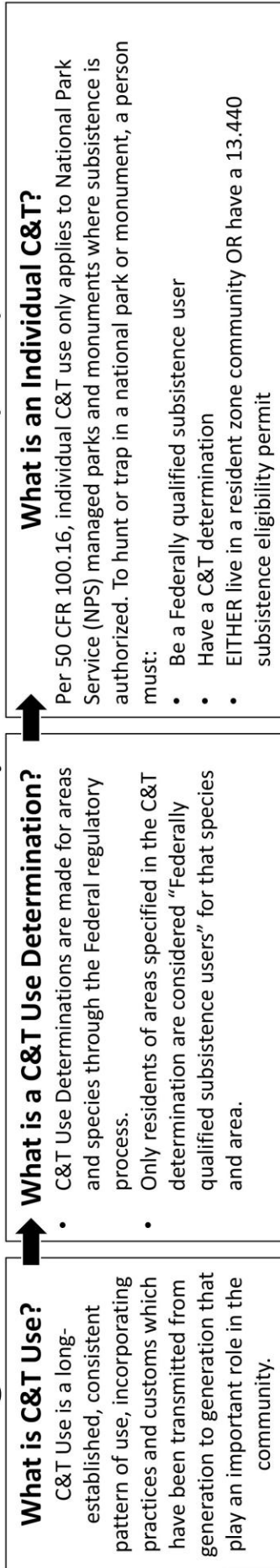
- There is sufficient evidence to support an individual customary and traditional use determination for (name) for (species) in (unit(s)/subunit(s))
- There is NOT sufficient evidence to support an individual customary and traditional use determination for (name) for (species) in (unit(s)/subunit(s))

Brief justification for above decision:

Signature of SRC Chair or Designee \_\_\_\_\_

Date \_\_\_\_\_

# Changes to the Individual Customary and Traditional (C&T) Process (01/2021)



## The Federal Subsistence Board has made changes to streamline the Individual C&T process:

Step	Application Window	Application Review	Proposed Analysis	Advisory Committee Review	Decisionmaker	Decision Timeline
<u>Previous Process</u>	Every two years	May be invalidated if application is incomplete or 13.440 subsistence eligibility permit is needed	Standard 8 factor format for C&T proposals. Analysis is prepared by NPS and Office of Subsistence Management (OSM) staff	Federal Subsistence Regional Advisory Council(s) (RAC)	Federal Subsistence Board (FSB)	Fixed schedule: at annual FSB regulatory meeting
<b>➔</b> <u>New Process</u>	Open continuously	NPS staff collaborates with applicant and helps process 13.440 subsistence eligibility permits, if needed	Standard 8 factor format for C&T proposals. Analysis is prepared by NPS staff	Federal Subsistence RAC(s) AND National Park Service Subsistence Resource Commission (SRC)	Federal Subsistence Board (FSB)	Flexible schedule: at next public FSB meeting following RAC and SRC recommendations

**More collaboration between Park staff and subsistence users**

**Both RACs and SRC review and comment**

**Potential application errors are immediately resolved**

**Faster application processing times**

## **ANNUAL REPORT REPLY PROCESS REVISION**

During the Federal Subsistence Board's (Board) August 2021 work session, the Board reviewed and discussed the annual report reply process and agreed to add this topic to the Regional Advisory Councils (Councils) Fall meeting agendas to get Council input on proposed revisions.

ANILCA, Section 805 gives authority to the Councils to prepare an annual report containing information related to current and future subsistence uses of fish and wildlife populations, an evaluation of current and future subsistence needs for these populations, a strategy for their management, and recommendations related to policies, standards, guidelines, and regulations to implement the strategy. These reports are invaluable as they provide the Board with a broad, holistic picture of local resource conditions, and the needs and challenges facing communities across rural Alaska. With this knowledge, the Board can make more informed decisions.

Historically, the Federal Subsistence Management Program has strived to provide responses to every topic listed in annual reports, developed by a diverse group of Federal staff. While all topics can be important to the Board in understanding local conditions, it is unclear if the responses on all matters warrant the use of often very limited staff capacity. Furthermore, the same or similar topics are often repeated in subsequent years with no resolution, and many topics are on issues over which the Board has no regulatory authority.

Importantly, ANILCA does not require replies to annual reports from the Councils and currently the Code of Federal Regulations state that the Board "consider the reports and recommendations of the Regional Councils." Instead of replying to every topic in an annual report, the Board believes it would be more beneficial to use other communication methods when Councils request a response from the Board, or from others who may have better technical understanding of each issue. Often this is already accomplished by Councils writing letters to these entities, including to the Board. This proposed revision will allow for more substantive and timely responses from the Board on topics most critical to the Councils. We propose that Councils consider letter writing as the most appropriate means for requesting a response to topics of concern, and that the annual report process be streamlined as a mechanism for informing the Board of local conditions and needs. Under this scenario, Councils could ask their Coordinators to write a letter to the Board if there are annual report topics to which they are specifically requesting a response. Any other topics, such as those outside the regulatory authority of the Board, can be addressed to the appropriate Federal agency staff at Council meetings, or Councils can write letters requesting a response directly from them, thus streamlining the response process and encouraging direct agency communications with the Councils.

The suggested revision is not intended to diminish the ability of the Councils to report to the Board on topics of concern, and Councils will still receive responses when requested from the Board. At this time, the Board is seeking input from the Councils on this proposed change to the annual report process. Council feedback on this issue is critical as the Board moves forward to make the reply process more efficient and responsive. The Board will consider Council input on this revision at its winter work session at the end of January 2022.

# **Building Partnerships and Capacity for Federal Subsistence Fisheries Management and Research in the North**

## **Partners for Fisheries Monitoring Program (PFMP)**

### **Introduction**

The Partners for Fisheries Monitoring Program was established in 2002 to increase the opportunity for Alaska Native and rural organizations to participate in Federal subsistence management. The program provides funding for fishery biologist, social scientist, or educator positions within the organization, with the intent of building and sustaining the organization's fisheries management expertise. In addition, the program supports a variety of opportunities for local, rural students to connect with subsistence management through science camps and paid internships.

The program has provided funding to mentor more than 100 college and 450 high school students, some of whom have gone on to become professionals in the field of natural resource conservation. To date with 13.3 million dollars spent, the program has supported nine Alaska Native organizations in building capacity. Organizations are funded for up to four years through a competitive grant process.

### **How to Get Involved**

The next funding opportunity will open in 2023; it is never too early to reach out and to begin planning the components of a proposed PFMP program. The Office of Subsistence Management (OSM) is happy to answer questions and provide advice regarding its various funding programs.

OSM also partners with the Alaska Native Science and Engineering Program (ANSEP) to provide internship opportunities that expose students to careers in natural resource management. If your existing Alaska based fisheries program could benefit from a student internship, or if your program has exciting fisheries-related opportunities to challenge and educate Alaska's rural youth, please be sure to let us know!

For more information, please visit our site at <https://www.doi.gov/subsistence/partners>. You can also contact the program's coordinator, Karen Hyer at [karen\\_hyer@fws.gov](mailto:karen_hyer@fws.gov) or 907-786-3689.

### **Partner Contacts**

- **BBNA:** Cody Larson, [clarson@bbna.com](mailto:clarson@bbna.com)
- **YTT:** Jennifer Hanlon, [jhanlon@ytttribe.org](mailto:jhanlon@ytttribe.org)
- **NVE:** Matt Piche, [matt.piche@eyak-nsn.gov](mailto:matt.piche@eyak-nsn.gov)
- **NVN:** Dan Gillikin, [dangillikin@gmail.com](mailto:dangillikin@gmail.com)
- **ONC:** Janessa Esquible, [jesquible@nativecouncil.org](mailto:jesquible@nativecouncil.org)

- **TCC:** Brian McKenna, [brian.mckenna@tananachiefs.org](mailto:brian.mckenna@tananachiefs.org)
- **QTU:** Chandra Poe, [chandra@qawalagin.com](mailto:chandra@qawalagin.com)

## **2021 Partners Program Participant Summaries**

### **Bristol Bay Native Association (BBNA)**

The Bristol Bay Native Association (BBNA) researches and highlights the role of fish used in satisfying a way of life, through collaborative investigations with our member tribes, universities, and state and federal managers. These partnerships inform our citizens of any changes to the public's relationships with fish and emphasize the value in the co-production of traditional knowledge and contemporary sciences research.

The BBNA Partners program funding is used in supporting the conversation between our residents, communities, and the managers tasked with decision-making on essential food resources. The program reinforces public input to the region's Fish and Game Advisory Committees, NPS Subsistence Resource Commissions, and the Federal Regional Advisory Council, while relaying information gathered from the social science investigations. Recent focus has been on subsistence fishery funding from section 12005 of the Cares Act, and the Chignik Fisheries disaster relief efforts.

Over the past year, the program informed and collaborated on multiple investigations and recent publications, some of which are available online and focus on; The Naknek River Subsistence Salmon Harvest, Subsistence Salmon Sharing Networks on the Alaska Peninsula, Voices of Alaska Native Women Fishers, Sharing Food and Community Resilience, and a Subsistence Harvest Assessment and Stock Composition of Dolly Varden and Nonsalmon Fish Stocks in the Togiak National Wildlife Refuge.

BBNA's program has coordinated dozens of internships with partners like Lake Clark National Park, Togiak National Wildlife Refuge, Alaska Dept. of Fish and Game, and the University of Washington. The leaders involved in these summer experiences have guided many students into careers in natural resource management. Some of those students have now become the mentors to the next cohort of future leaders. While the 2020 summer internships were successfully held virtually, we are looking forward to getting the hands-on field experiences in 2021!

### **Yakutat Tlingit Tribe (YTT)**

Yakutat Tlingit Tribe (YTT) is a federally recognized tribe with 820 enrolled Tribal Members located on the northern coast of the Gulf of Alaska. Developing conservation concerns about local salmon stocks have highlighted the need for building capacity for fisheries monitoring and management in the YTT Environmental Department. Through the Partners Program, YTT hired a full time Fisheries Biologist in 2020 to participate in subsistence management and instill place-based knowledge on the Situk River. YTT's Fisheries Biologist partners with the Yakutat District River Ranger to serve as the primary contacts to the public on the Situk River (April-September).

The team's primary job is to contact Situk users to promote stewardship and cultural awareness. Being on the river during peak fishing seasons, they can communicate conservation messages to anglers streamside on topics like catch and release, don't tread on redds, salmon ecology, angler etiquette, current regulations, alternative fishing sites, and habitat degradation. The biologist provides river users with



context about history and cultural importance of salmon with the Situk being the primary source for subsistence in Yakutat. In the past, brown bears associating anglers with fish has been a safety concern for both people and bears on the Situk. However, in coordination with the USFS Wildlife Biologist and Fish and Game, the River Rangers have aggressively worked to curb the behaviors amongst fisherman that lead to this problem. The consistent presence of the partners alone will prompt stewardship and good behavior amongst the varied Situk River users.

The Partners Program has enhanced YTT's capacity by broadening the scope of resources and tools available to the Tribe such as allowing access to valuable datalike river use, stream restoration trainings, and research methods like eDNA. This partnership forges a strong foundation that strengthens and supports the YTT Environmental Department's capacity to identify and respond to conservation concerns that impact tribal interests. YTT looks forward to expanding the department and welcoming an intern under the Partners Program.

### **Tanana Chiefs Conference (TCC)**

The Tanana Chiefs Conference (TCC) serves as a non-profit organization for the Interior region of Alaska. The TCC region covers an area of 235,000 square miles and overlaps three separate National Wildlife Refuges (NWR): Kanuti, Koyukuk-Innoko-Nowitna, and the Yukon Flats. Since its creation, the TCC has become the provider of several programs in the Interior of Alaska. Through contracts with the Bureau of Indian Affairs, TCC is responsible for the management and delivery of services such as housing, land management, tribal government assistance, education and employment services, and natural resources management.

Within TCC's organizational structure, the Wildlife and Parks (W&P) Program is responsible for serving the subsistence needs of its tribes and tribal members. The Partners Program allows the TCC W&P Program the ability to maintain a fulltime fisheries biologist on staff and has allowed TCC to develop the capacity to address the subsistence needs of TCC tribes and tribal members by conducting a variety of fisheries research programs and also by participating in federal and state fisheries management meetings.

Through the Partners Program, TCC has successfully operated the Henshaw Creek Weir salmon monitoring project in the upper Koyukuk River. TCC strives to recruit and hire local technicians and youth to assist with the project each year. The Henshaw project also hosts an annual summer science and culture camp that is jointly operated by TCC and the Kanuti NWR. Elders and youth are brought together at the camp where the Elders teach students traditional skills (like setting nets, cutting and drying fish, and Athabascan language). TCC and Kanuti staff provide lessons in western science such as weir sampling, salmon biology and ecology and fisheries management.

Outside of the Henshaw Creek Weir project, TCC has been able to lead other fisheries investigations such as updating the Yukon River Chinook and chum salmon genetic baselines, mapping salmon spawning habitat and updating the Anadromous Waters Catalog and exploring the capabilities of small unmanned aerial systems to assist with salmon research and management. Additionally, each year they host one or two Alaska Native Science and Engineering Program (ANSEP) summer bridge students and provide them with the opportunity to gain hands on knowledge and experience in fisheries management within the Yukon River drainage.

### **Native Village of Eyak (NVE)**

The Native Village of Eyak's Department of the Environment and Natural Resources (NVE-DENR) Fisheries Program focuses on population monitoring, filling data gaps, using traditional ecological knowledge to improve data collection, and working with partners to ensure a future with healthy robust fish populations while supporting sustainable fisheries. PFMP funds are used to support a permanent fish biologist responsible for leading the fisheries program and seasonal fisheries interns who gain valuable hands-on experience.

The current PFMP is also supporting the development of a youth science and subsistence camp and outreach with other organizations and researchers throughout the region. Current research led by NVE's Partners Program biologist includes Chinook salmon inriver abundance, Copper River (2003-2021); Chinook salmon distribution and stock specific run timing, Copper River (2019-2021); Klutina River salmon enumeration sonar pilot study (2021-2024).

Furthermore, NVE is continually sharing its resources and expertise to accomplish more work through partnerships with other researchers. Current partners on side-studies include Alaska Department of Fish and Game Division of Sport Fish and Commercial Fisheries, Prince William Sound Science Center, and Ahtna Intertribal Resource Commission.

### **Native Village of Napaimute (NVN)**

The Native Village of Napaimute (NVN) is a federally recognized tribe and has about 100 members; the village is only seasonally occupied currently. The Napaimute Partners in Fisheries Monitoring Program main goals are to; improve effectiveness of local outreach related to fisheries management, provide opportunities in natural resource education and experience for local youth, build local capacity through strategic program and workforce development, and develop a sustainable natural resource program.

Outreach related to fisheries management is achieved by participating in management discussions with various advisory groups i.e., Kuskokwim River Inter Tribal Fish Commission, Kuskokwim Salmon Management Working Group, and agencies (ADF&G, USFWS). We routinely post in-season management actions on social media and around the Villages to keep fishers informed on the latest regulations.

Our youth outreach involves two projects; the Math Science Expedition (MSE) and the George River Internship (GRI). The MSE is tailored more to be leadership development experience with some exposure to fisheries ecology and data collection. The MSE typically accommodates 25-30 students on a two week-long rafting trip down the Salmon and Aniak Rivers.

The GRI is an advanced paid Internship opportunity on the George River where Interns learn about river ecology, hydrology, sampling techniques for fish and benthic macro- invertebrates, leadership skills and career opportunities in the area of natural resource management.

The PFMP has allowed us to build the capacity to peruse funding for and help support fisheries monitoring programs (Aniak Test Fishery & Salmon River Weir) funded through the USFWS Fisheries Resource Monitoring Program, along with several environmental monitoring and fisheries assistance projects. Projects are mostly staffed by local residents and Alaska Native Science and Engineering Students (ANSEP).

### **Orutsararmiut Native Council (ONC)**

Orutsararmiut Native Council (ONC) is the Federally recognized Tribal Government for the Native Village of Bethel, Alaska and has greatly expanded its Partners Program since 2008. ONC Partners Program strives to support ongoing fisheries in season and postseason monitoring programs; serve as a mentor for rural, Alaska Native student interns in coordination with other state, federal, and tribal entities; communicate results of the fisheries monitoring program projects to various audiences to enhance federal subsistence management awareness in rural communities; continue youth internship programs; and pursue external funds and partnerships to expand the current Partners Program. In the past, with the support of the Partners Program, ONC was able to conduct annual Science & Culture Camps, as well as science, technology, engineering, and math (STEM) middle school career exploration programs in Bethel with the help of Alaska Native Science & Engineering Program (ANSEP) and several other partner agencies.

Our Partners Program also became involved with the Aniak & Salmon River Math & Science Expedition by fisheries educational outreach with youth from the middle Kuskokwim. ONC's involvement with youth camp programs throughout the years was able to reach many students ranging from 6th to 12th grade. Despite the difficulties and cancellations that came with the COVID-19 pandemic, ONC's Partners Program work has continued in a safe manner with new procedures and creative methods to engage youth. We would like to sincerely thank the Office of Subsistence Management and other partnering entities, for without their support, our program would not have had the ability to support the youth of the Yukon-Kuskokwim Delta. The support of our partners has allowed ONC to have great success in expanding its involvement on scientific and educational outreach projects and programs.

### **Qawalangin Tribe of Unalaska (QTU)**

The Qawalangin Tribe of Unalaska is a federally recognized sovereign nation. The Unangan people have continuously occupied their homelands along the Aleutian and Pribilof Islands for thousands of years, relying on a close relationship with the sea and lands.

As a new participant in the Partners program, the Tribe is looking forward to continuing work to ensure healthy subsistence species and food sovereignty for generations to come.

A key project in our first year as a Partners program participant was collaborating with ADFG to operate a weir at McLees Lake, monitoring this sockeye run that is an important subsistence resource for the community. In our first year, we restored structures at the site that had fallen into disrepair during a 2-year gap in funding for the weir. Our staff gained experience in weir setup and operations and scale sampling. We are looking forward to building our staff capacity and increasing our presence at the weir in coming seasons and working to ensure continuity of this important salmon monitoring site.

In addition to continuing work at the McLees weir in partnership with ADFG, in the coming years we are looking forward to establishing a strong outreach and education program to build awareness and support of subsistence resource management, so important to our coastal community.

# Winter 2022 Regional Advisory Council Meeting Calendar

*Last updated 3/19/2021*

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday-	Thursday	Friday	Saturday
Feb. 6	Feb. 7 <i>Window Opens</i>	Feb. 8	Feb. 9	Feb. 10	Feb. 11	Feb. 12
		<b>BB - Naknek</b>		<b>SC - Anchorage</b>		
Feb. 13	Feb. 14	Feb. 15	Feb. 16	Feb. 17	Feb. 18	Feb. 19
	<b>NWA - Kotzebue</b>		<b>WI - Galena</b>			
Feb. 20	Feb. 21 <b>PRESIDENTS DAY HOLIDAY</b>	Feb. 22	Feb. 23	Feb. 24	Feb. 25	Feb. 26
		<b>KA - Kodiak</b>				
Feb. 27	Feb. 28	Mar. 1	Mar. 2	Mar. 3	Mar. 4	Mar. 5
		<b>YKD - Bethel</b>		<b>SP - Nome</b>		
Mar. 6	Mar. 7	Mar. 8	Mar. 9	Mar. 10	Mar. 11	Mar. 12
		<b>EI - Fort Yukon</b>				
		<b>NS - TBD</b>				
Mar. 13	Mar. 14	Mar. 15	Mar. 16	Mar. 17	Mar. 18	Mar. 19
Mar. 20	Mar. 21	Mar. 22	Mar. 23	Mar. 24	Mar. 25	Mar. 26
		<b>SEA - Sitka</b>			<i>Window Closes</i>	

# Fall 2022 Regional Advisory Council Meeting Calendar

*Last updated 8/5/2021*

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Aug. 7	Aug. 8 <i>Window Opens</i>	Aug. 9	Aug. 10	Aug. 11	Aug. 12	Aug. 13
Aug. 14	Aug. 15	Aug. 16	Aug. 17	Aug. 18	Aug. 19	Aug. 20
Aug. 21	Aug. 22	Aug. 23	Aug. 24	Aug. 25	Aug. 26	Aug. 27
Aug. 28	Aug. 29	Aug. 30	Aug. 31	Sep. 1	Sep. 2	Sep. 3
Sep. 4	Sep. 5 <b>Labor Day Holiday</b>	Sep. 6	Sep. 7	Sep. 8	Sep. 9	Sep. 10
Sep. 11	Sep. 12	Sep. 13	Sep. 14	Sep. 15	Sep. 16	Sep. 17
Sep. 18	Sep. 19	Sep. 20	Sep. 21	Sep. 22	Sep. 23	Sep. 24
Sep. 25	Sep. 26	Sep. 27	Sep. 28	Sep. 29	Sep. 30	Oct. 1
Oct. 2	Oct. 3	Oct. 4	Oct. 5	Oct. 6	Oct. 7	Oct. 8
Oct. 9	Oct. 10 <b>Columbus Day Holiday</b>	Oct. 11	Oct. 12	Oct. 13	Oct. 14	Oct. 15
Oct. 16	Oct. 17	Oct. 18	Oct. 19	Oct. 20	Oct. 21	Oct. 22
Oct. 23	Oct. 24	Oct. 25	Oct. 26	Oct. 27	Oct. 28	Oct. 29
Oct. 30	Oct. 31	Nov. 1	Nov. 2	Nov. 3	Nov. 4 <i>Window Closes</i>	Nov. 5

## **Subsistence Regional Advisory Council Correspondence Policy**

The Federal Subsistence Board (Board) recognizes the value of the Regional Advisory Councils' role in the Federal Subsistence Management Program. The Board realizes that the Councils must interact with fish and wildlife resource agencies, organizations, and the public as part of their official duties, and that this interaction may include correspondence. Since the beginning of the Federal Subsistence Program, Regional Advisory Councils have prepared correspondence to entities other than the Board. Informally, Councils were asked to provide drafts of correspondence to the Office of Subsistence Management (OSM) for review prior to mailing. Recently, the Board was asked to clarify its position regarding Council correspondence. This policy is intended to formalize guidance from the Board to the Regional Advisory Councils in preparing correspondence.

The Board is mindful of its obligation to provide the Regional Advisory Councils with clear operating guidelines and policies, and has approved the correspondence policy set out below. The intent of the Regional Advisory Council correspondence policy is to ensure that Councils are able to correspond appropriately with other entities. In addition, the correspondence policy will assist Councils in directing their concerns to others most effectively and forestall any breach of department policy.

The Alaska National Interest Lands Conservation Act, Title VIII required the creation of Alaska's Subsistence Regional Advisory Councils to serve as advisors to the Secretary of the Interior and the Secretary of Agriculture and to provide meaningful local participation in the management of fish and wildlife resources on Federal public lands. Within the framework of Title VIII and the Federal Advisory Committee Act, Congress assigned specific powers and duties to the Regional Advisory Councils. These are also reflected in the Councils' charters. (*Reference: ANILCA Title VIII §805, §808, and §810; Implementing regulations for Title VIII, 50 CFR 100 \_\_.11 and 36 CFR 242 \_\_.11; Implementing regulations for FACA, 41 CFR Part 102-3.70 and 3.75*)

The Secretaries of Interior and Agriculture created the Federal Subsistence Board and delegated to it the responsibility for managing fish and wildlife resources on Federal public lands. The Board was also given the duty of establishing rules and procedures for the operation of the Regional Advisory Councils. The Office of Subsistence Management was established within the Federal Subsistence Management Program's lead agency, the U.S. Fish and Wildlife Service, to administer the Program. (*Reference: 36 CFR Part 242 and 50 CFR Part 100 Subparts C and D*)

### **Policy**

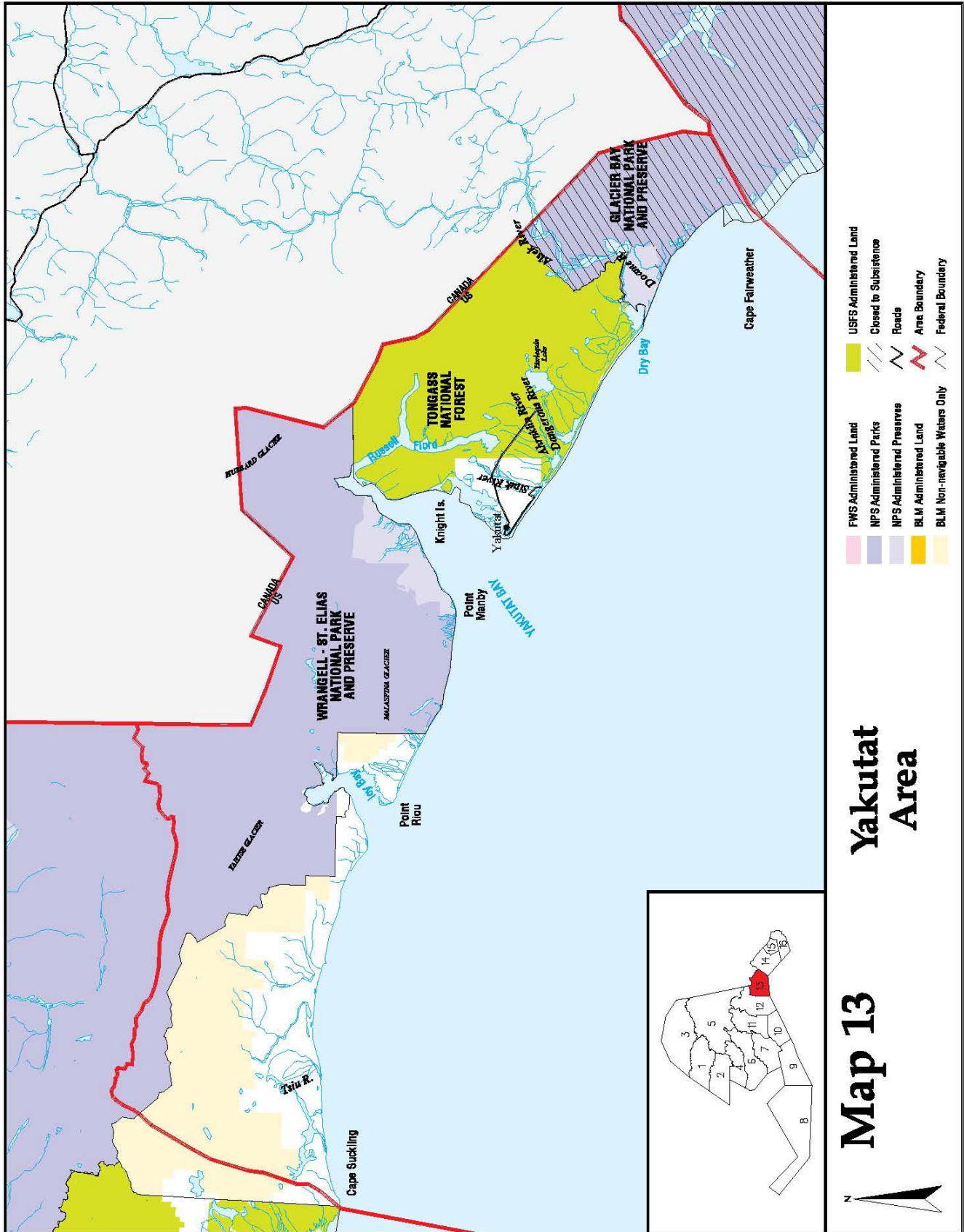
1. The subject matter of Council correspondence shall be limited to matters over which the Council has authority under §805(a)(3), §808, §810 of Title VIII, Subpart B §\_\_\_\_.11(c) of regulation, and as described in the Council charters.
2. Councils may, and are encouraged to, correspond directly with the Board. The Councils are advisors to the Board.
3. Councils are urged to also make use of the annual report process to bring matters to the Board's attention.

4. As a general rule, Councils discuss and agree upon proposed correspondence during a public meeting. Occasionally, a Council chair may be requested to write a letter when it is not feasible to wait until a public Council meeting. In such cases, the content of the letter shall be limited to the known position of the Council as discussed in previous Council meetings.
5. Except as noted in Items 6, 7, and 8 of this policy, Councils will transmit all correspondence to the Assistant Regional Director (ARD) of OSM for review prior to mailing. This includes, but is not limited to, letters of support, resolutions, letters offering comment or recommendations, and any other correspondence to any government agency or any tribal or private organization or individual.
  - a. Recognizing that such correspondence is the result of an official Council action and may be urgent, the ARD will respond in a timely manner.
  - b. Modifications identified as necessary by the ARD will be discussed with the Council chair. Councils will make the modifications before sending out the correspondence.
6. Councils may submit written comments requested by Federal land management agencies under ANILCA §810 or requested by regional Subsistence Resource Commissions (SRC) under §808 directly to the requesting agency. Section 808 correspondence includes comments and information solicited by the SRCs and notification of appointment by the Council to an SRC.
7. Councils may submit proposed regulatory changes or written comments regarding proposed regulatory changes affecting subsistence uses within their regions to the Alaska Board of Fisheries or the Alaska Board of Game directly. A copy of any comments or proposals will be forwarded to the ARD when the original is submitted.
8. Administrative correspondence such as letters of appreciation, requests for agency reports at Council meetings, and cover letters for meeting agendas will go through the Council's regional coordinator to the appropriate OSM division chief for review.
9. Councils will submit copies of all correspondence generated by and received by them to OSM to be filed in the administrative record system.
10. Except as noted in Items 6, 7, and 8, Councils or individual Council members acting on behalf of or as representative of the Council may not, through correspondence or any other means of communication, attempt to persuade any elected or appointed political officials, any government agency, or any tribal or private organization or individual to take a particular action on an issue. This does not prohibit Council members from acting in their capacity as private citizens or through other organizations with which they are affiliated.

Approved by the Federal Subsistence Board on June 15, 2004.

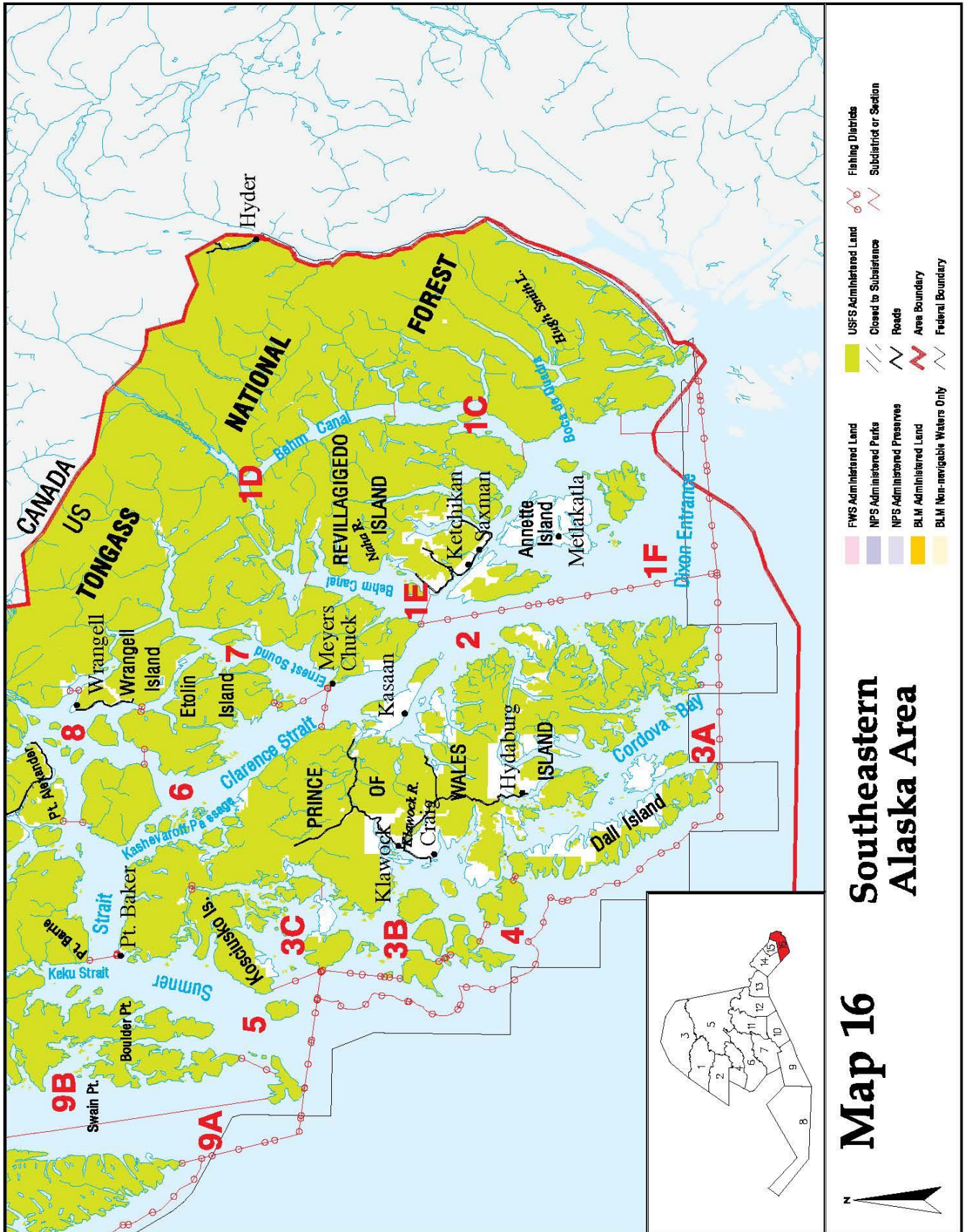




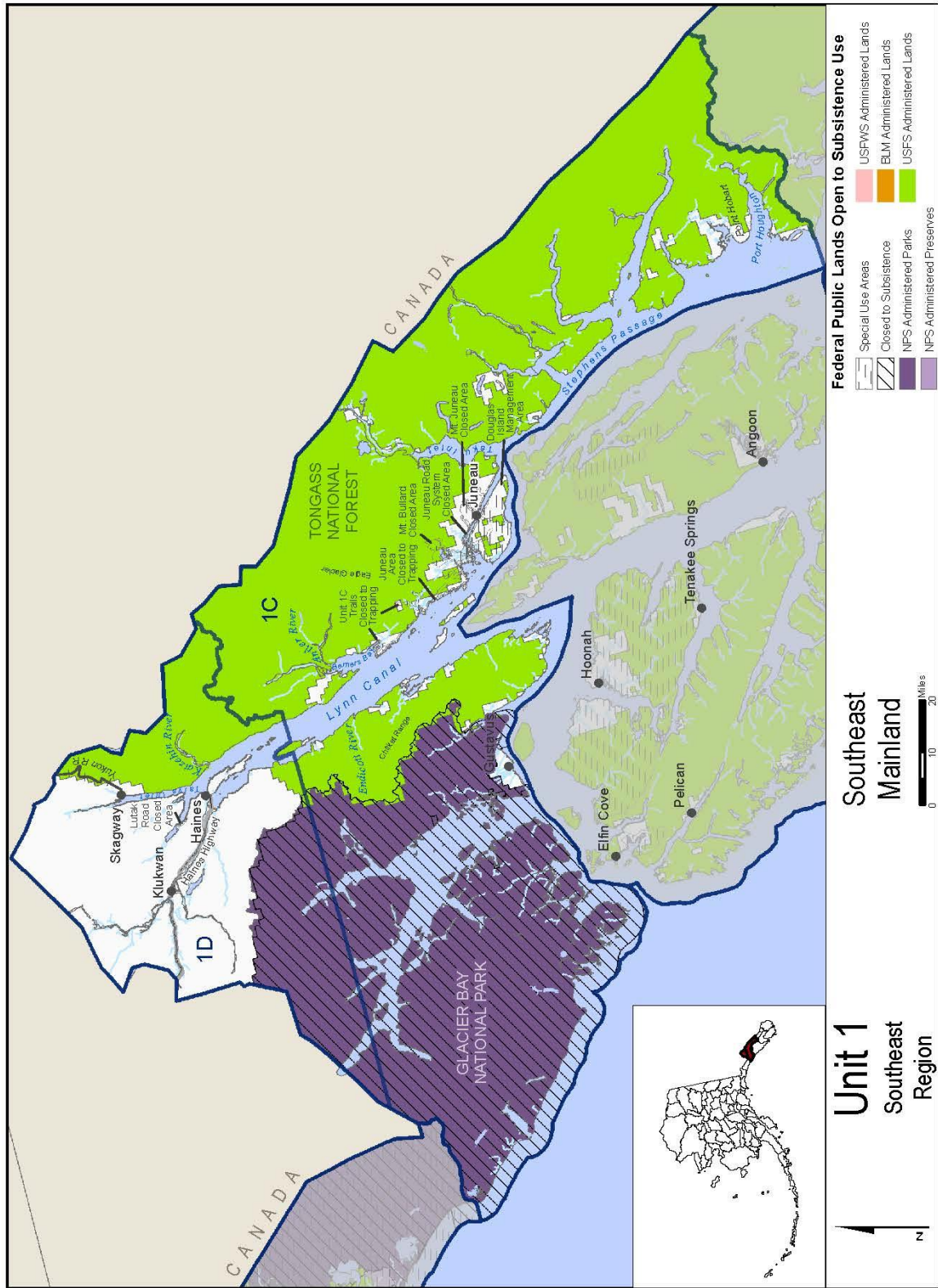


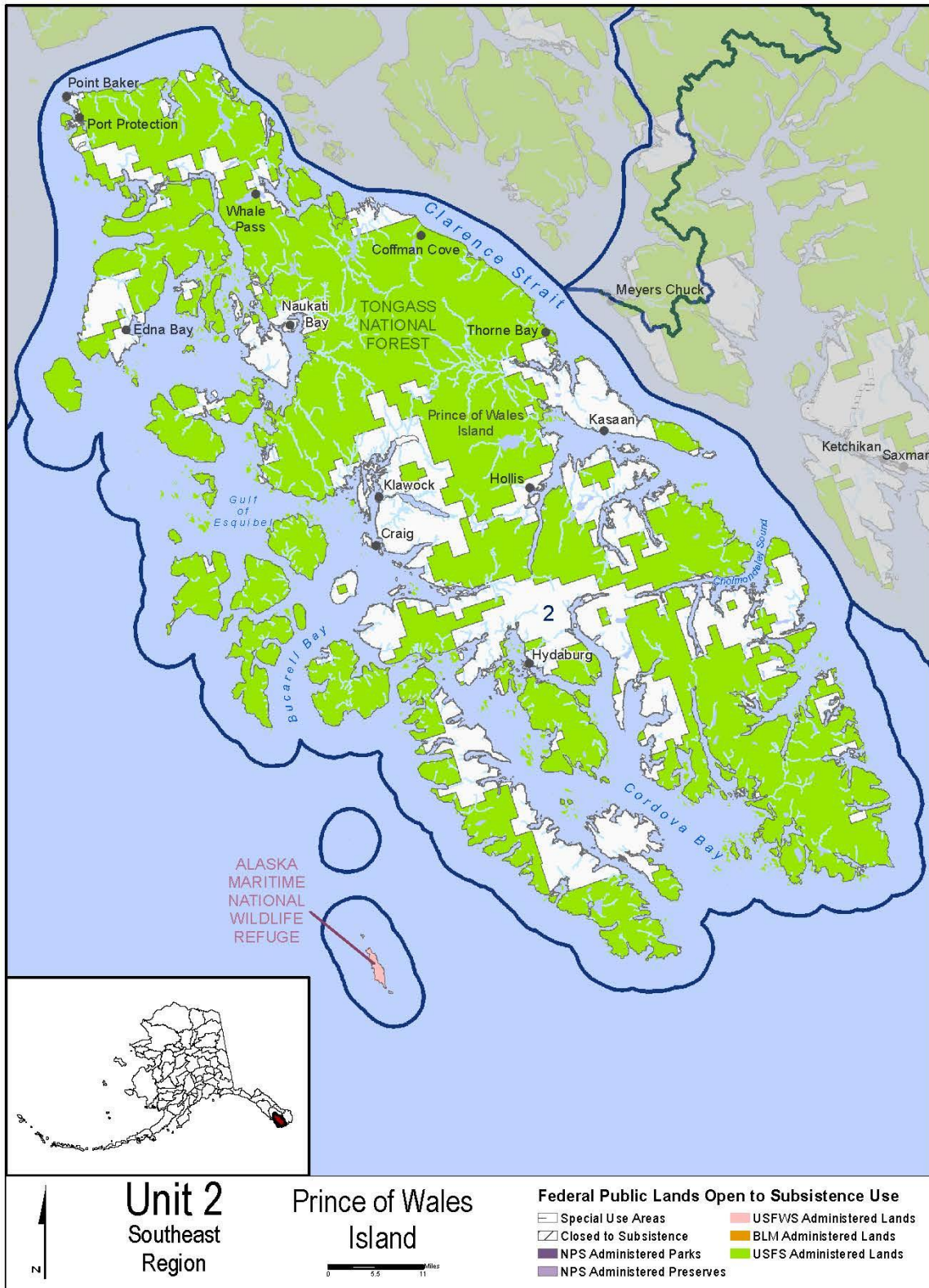


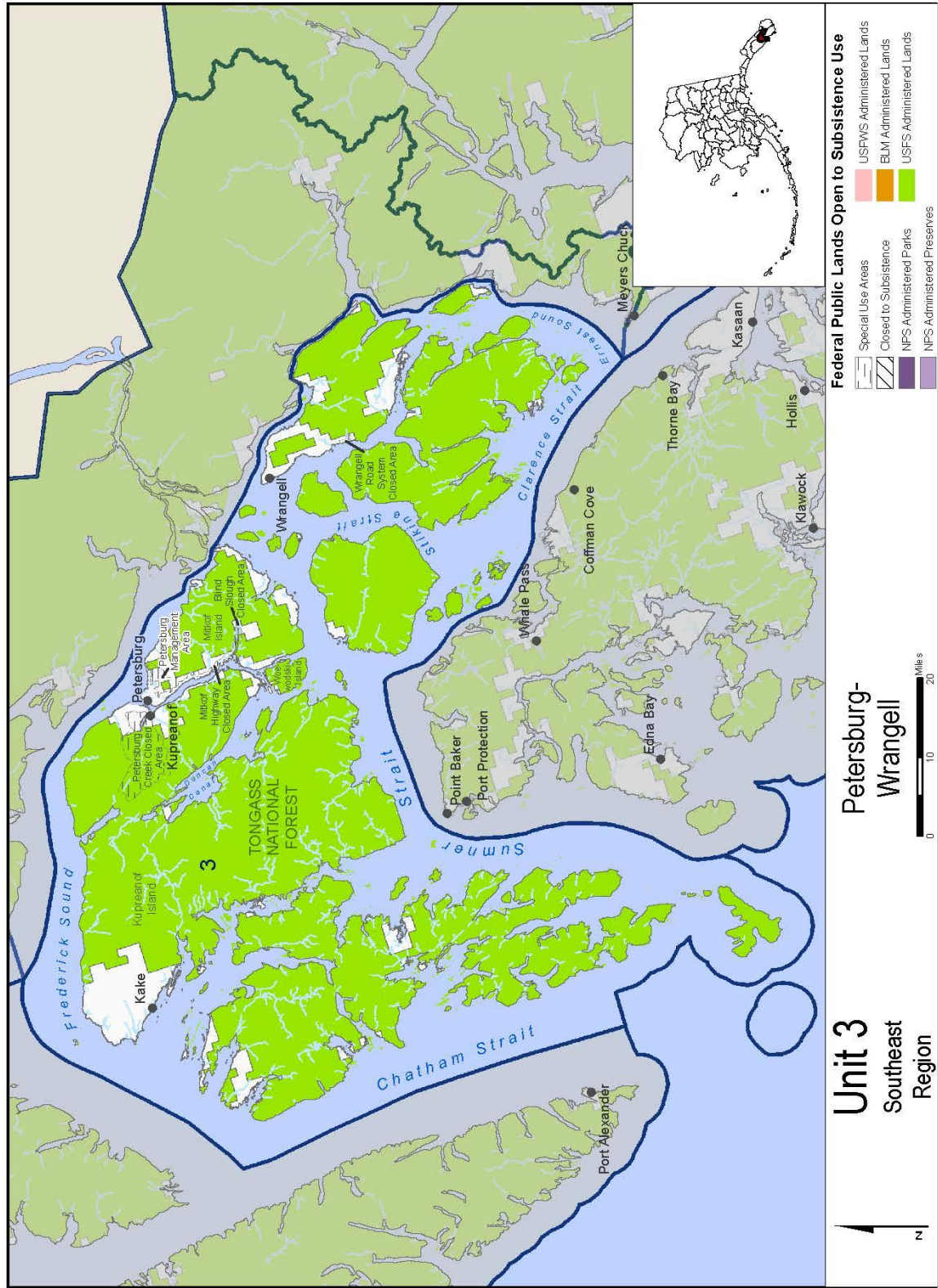




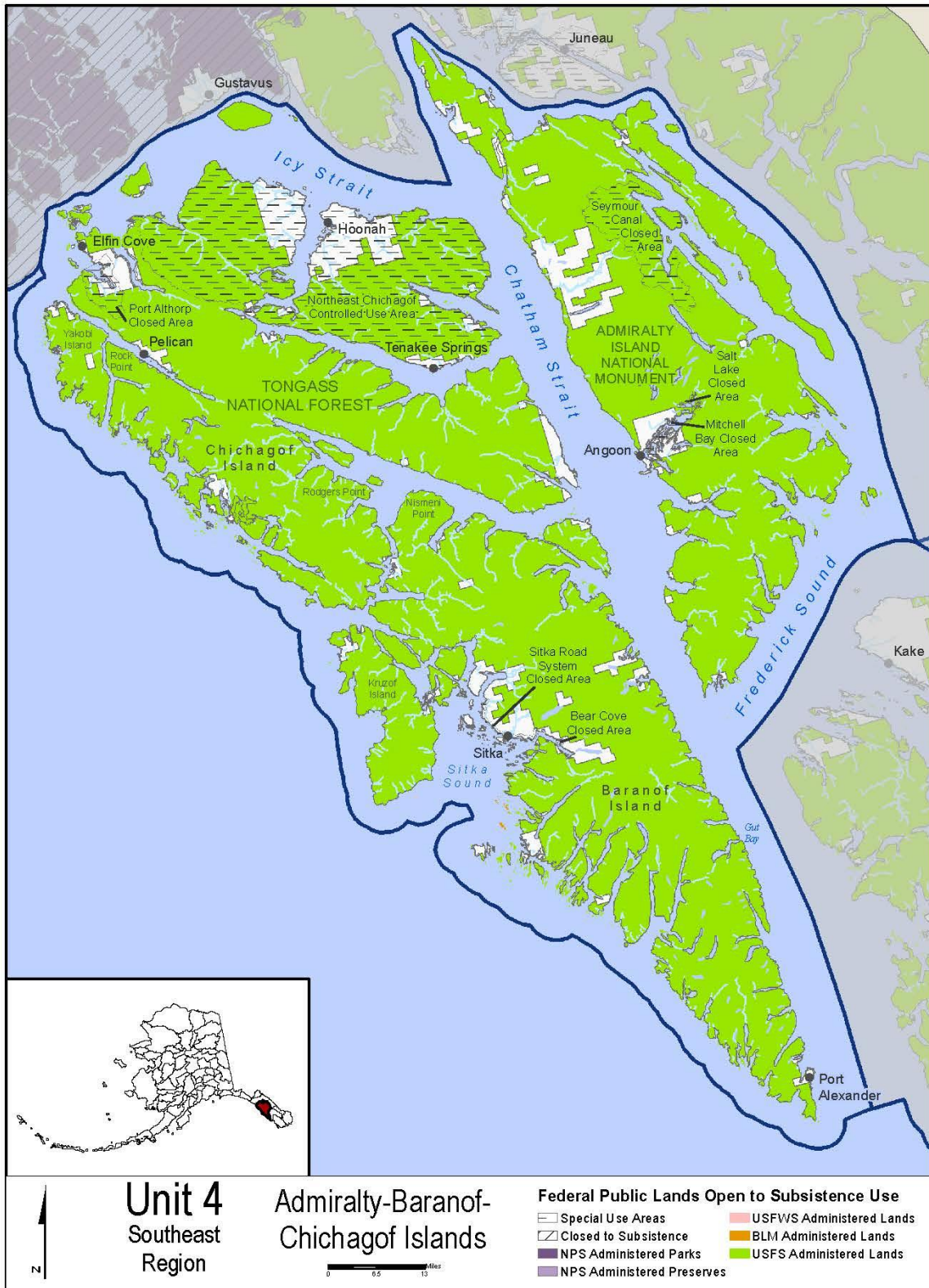


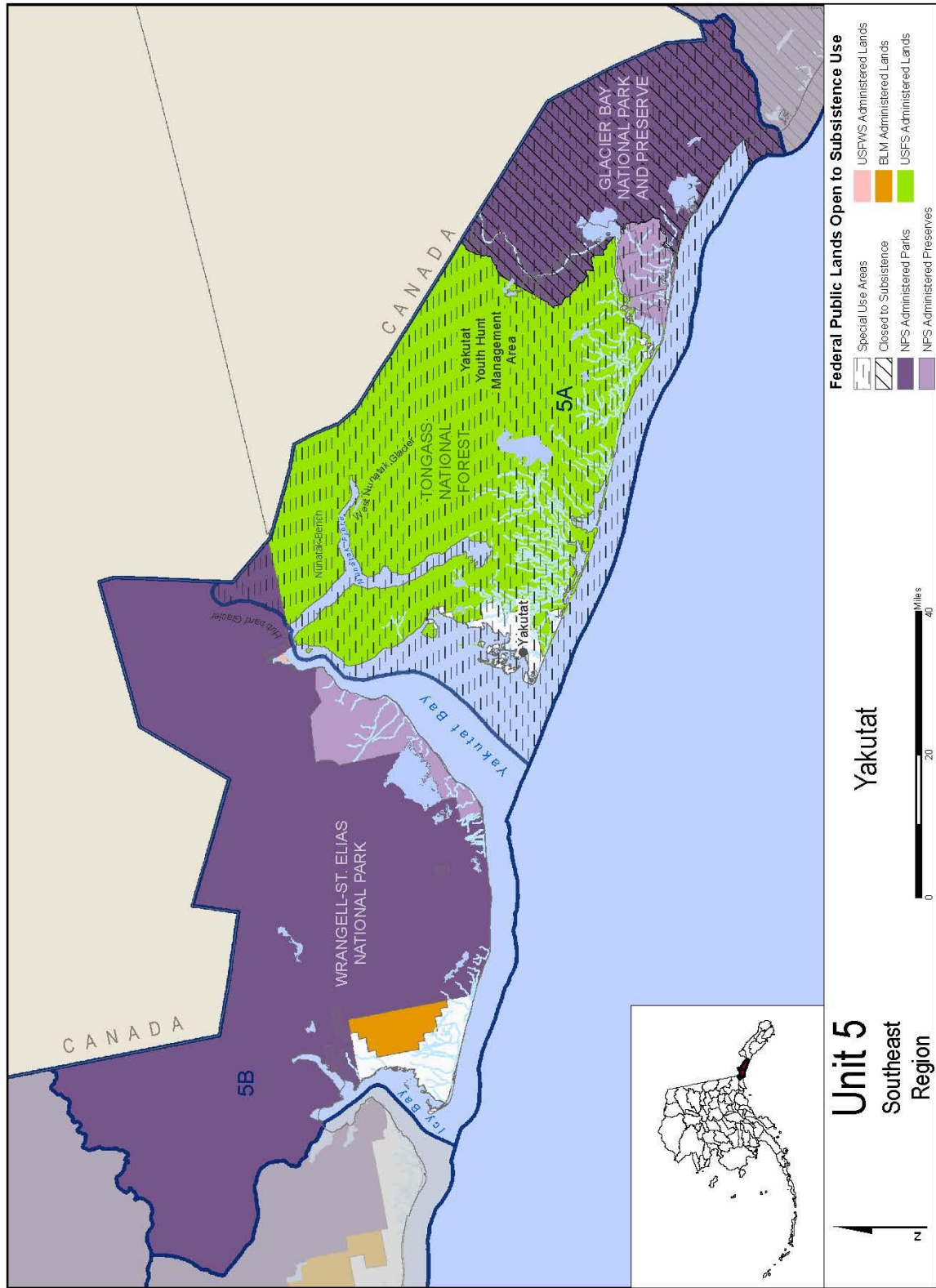












**Department of the Interior  
U. S. Fish and Wildlife Service**

**Southeast Alaska Subsistence Regional Advisory Council**

**Charter**

1. **Committee's Official Designation.** The Council's official designation is the Southeast Alaska Subsistence Regional Advisory Council (Council).
2. **Authority.** The Council is renewed by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. 3115 (1988)) Title VIII, and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is regulated by the Federal Advisory Committee Act (FACA), as amended, (5 U.S.C. Appendix 2).
3. **Objectives and Scope of Activities.** The objective of the Council is to provide a forum for the residents of the Region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the Region.
4. **Description of Duties.** Council duties and responsibilities, where applicable, are as follows:
  - a. Recommend the initiation, review, and evaluation of proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the Region.
  - b. Provide a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife on public lands within the Region.
  - c. Encourage local and regional participation in the decision-making process affecting the taking of fish and wildlife on the public lands within the region for subsistence uses.
  - d. Prepare an annual report to the Secretary containing the following:
    - (1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the Region;
    - (2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the Region;

- (3)A recommended strategy for the management of fish and wildlife populations within the Region to accommodate such subsistence uses and needs; and
  - (4)Recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.
- e. Appoint one member to the Wrangell-St. Elias National Park Subsistence Resource Commission in accordance with section 808 of the ANILCA.
- f. Make recommendations on determinations of customary and traditional use of subsistence resources.
- g. Make recommendations on determinations of rural status.
- h. Provide recommendations on the establishment and membership of Federal local advisory committees.
- i. Provide recommendations for implementation of Secretary’s Order 3347: Conservation Stewardship and Outdoor Recreation, and Secretary’s Order 3356: Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories. Recommendations shall include, but are not limited to:
  - (1)Assessing and quantifying implementation of the Secretary’s Orders, and recommendations to enhance and expand their implementation as identified;
  - (2)Policies and programs that:
    - (a)increase outdoor recreation opportunities for all Americans, with a focus on engaging youth, veterans, minorities, and other communities that traditionally have low participation in outdoor recreation;
    - (b)expand access for hunting and fishing on Bureau of Land Management, U.S. Fish and Wildlife Service, and National Park Service lands in a manner that respects the rights and privacy of the owners of non-public lands;e
    - (c)increase energy, transmission, infrastructure, or other relevant projects while avoiding or minimizing potential negative impacts on wildlife; and
    - (d)create greater collaboration with States, Tribes, and/or Territories.
- j. Provide recommendations for implementation of the regulatory reform initiatives and policies specified in section 2 of Executive Order 13777: Reducing

Regulation and Controlling Regulatory Costs; Executive Order 12866: Regulatory Planning and Review, as amended; and section 6 of Executive Order 13563: Improving Regulation and Regulatory Review. Recommendations shall include, but are not limited to:

Identifying regulations for repeal, replacement, or modification considering, at a minimum, those regulations that:

- (1) eliminate jobs, or inhibit job creation;
- (2) are outdated, unnecessary, or ineffective;
- (3) impose costs that exceed benefits;
- (4) create a serious inconsistency or otherwise interfere with regulatory reform initiative and policies;
- (5) rely, in part or in whole, on data or methods that are not publicly available or insufficiently transparent to meet the standard for reproducibility; or
- (6) derive from or implement Executive Orders or other Presidential and Secretarial directives that have been subsequently rescinded or substantially modified.

All current and future Executive Orders, Secretary's Orders, and Secretarial Memos should be included for discussion and recommendations as they are released. At the conclusion of each meeting or shortly thereafter, provide a detailed recommendation meeting report, including meeting minutes, to the Designated Federal Officer (DFO).

5. **Agency or Official to Whom the Council Reports.** The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.
6. **Support.** The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.
7. **Estimated Annual Operating Costs and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$195,000, including all direct and indirect expenses and 1.15 Federal staff years.
8. **Designated Federal Officer.** The DFO is the Subsistence Council Coordinator for the Region or such other Federal employee as may be designated by the Assistant Regional Director – Subsistence, Region 11, U.S. Fish and Wildlife Service. The DFO is a full-time Federal employee appointed in accordance with Agency procedures. The DFO will:

- (a) Approve or call all Council and subcommittee meetings;
- (b) Prepare and approve all meeting agendas;
- (c) Attend all committee and subcommittee meetings;
- (d) Adjourn any meeting when the DFO determines adjournment to be in the public interest; and
- (e) Chair meetings when directed to do so by the official to whom the advisory committee reports.

**9. Estimated Number and Frequency of Meetings.** The Council will meet 1-2 times per year, and at such times as designated by the Federal Subsistence Board Chair or the DFO.

**10. Duration.** Continuing.

**11. Termination.** The Council will be inactive 2 years from the date the charter is filed, unless prior to that date, the charter is renewed in accordance with the provisions of section 14 of the FACA. The Council will not meet or take any action without a valid current charter.

**12. Membership and Designation.** The Council's membership is composed of representative members as follows:

Thirteen members who are knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife and who are residents of the region represented by the Council.

To ensure that each Council represents a diversity of interests, the Federal Subsistence Board in their nomination recommendations to the Secretary will strive to ensure that nine of the members (70 percent) represent subsistence interests within the region and four of the members (30 percent) represent commercial and sport interests within the region. The portion of membership representing commercial and sport interests must include, where possible, at least one representative from the sport community and one representative from the commercial community.

The Secretary of the Interior will appoint members based on the recommendations from the Federal Subsistence Board and with the concurrence of the Secretary of Agriculture.

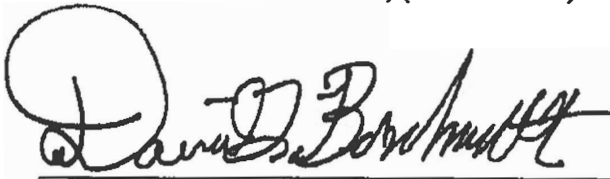
Members will be appointed for 3-year terms. Members serve at the discretion of the Secretary.

Alternate members may be appointed to the Council to fill vacancies if they occur out of cycle. An alternate member must be approved and appointed by the Secretary before attending the meeting as a representative. The term for an appointed alternate member will be the same as the term of the member whose vacancy is being filled.

Council members will elect a Chair, Vice-Chair, and Secretary for a 1-year term.

Members of the Council will serve without compensation. However, while away from their homes or regular places of business, Council and subcommittee members engaged in Council, or subcommittee business, approved by the DFO, may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under section 5703 of title 5 of the United States Code.

13. **Ethics Responsibilities of Members.** No Council or subcommittee member will participate in any Council or subcommittee deliberations or votes relating to a specific party matter before the Department or its bureaus and offices including a lease, license, permit, contract, grant, claim, agreement, or litigation in which the member or the entity the member represents has a direct financial interest.
14. **Subcommittees.** Subject to the DFOs approval, subcommittees may be formed for the purpose of compiling information or conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO and the availability of resources.
15. **Recordkeeping.** Records of the Council, and formally and informally established subcommittees or other subgroups of the Council, must be handled in accordance with General Records Schedule 6.2, and other approved Agency records disposition schedule. These records must be available for public inspection and copying, subject to the Freedom of Information Act, (5 U.S.C. 552).



Secretary of the Interior

DEC 12 2019

Date Signed

DEC 13 2019

Date Filed







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