



SOUTHEAST ALASKA SUBSISTENCE
REGIONAL ADVISORY COUNCIL
Meeting Materials

*October 5-7, 2021
via teleconference*



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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**.

VIDEO: Call **1-800-478-1456** or **1-907-786-3888** for the link to **Microsoft Teams videoconference**. This is an additional option for visual presentations only, not a substitute for the teleconference feed.

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.

1. Invocation

2. Call to Order (*Chair*)

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4. Welcome and Introductions (*Chair*)

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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*)
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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**.

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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, or 800-877-8339 (TTY), by close of business on September 20, 2021.

REGION 1

Southeast Alaska Subsistence Regional Advisory Council

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

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*¹, 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.

¹ 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.

DeAnna Perry, Designated Federal Officer
USDA Forest Service

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.



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)

Meeting Dates	Topics	Location	Comment Deadline
October 20-21, 2021 [2 days]	Work Session ACRs, cycle organization, Stocks of Concern	Anchorage Egan Civic and Convention Center	Oct. 6, 2021
Nov. 30-Dec. 6, 2021 [7 days]	Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish (Except shrimp)	Cordova The Cordova Center	Nov. 15, 2021
January 4-15, 2022 [12 days]	Southeast and Yakutat Finfish and Shellfish	Ketchikan Ted Ferry Civic Center	Dec. 22, 2021
March 10, 2022 [1 day]	Hatchery Committee	Anchorage TBD	Feb. 23, 2022
March 11-16, 2022 [6 days]	Cook Inlet, Kodiak, Westward, Arctic Shellfish and Shellfish General Provisions, and Prince William Sound Shrimp	Anchorage 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
 P.O. Box 115526
 Juneau, AK 99811-5526
 (907) 465-4110
 www.adfg.alaska.gov

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.

Meeting Areas and Species
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>Meeting Cycle Years: 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>Meeting Cycle Years: 2022/2023 2025/2026 2028/2029 2031/2032</i>
Cook Inlet Area all Finfish Kodiak Area all Finfish <i>Meeting Cycle Years: 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
802 3rd Street
Douglas, AK 99824



Alaska Department of Fish and Game
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

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, Douglass_Cooper@fws.gov .
Golden-cheeked warbler	Adam Zerrenner, Field Supervisor, Austin Ecological Services Field Office, 512-490-0057 x248, Adam_Zerrenner@fws.gov .
Western ridged mussel	Paul Henson, State Supervisor, Portland Ecological Services Field Office, 503-231-6179, paul_henson@fws.gov .

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 http://www.regulations.gov
Alexander Archipelago wolf	FWS-R7-ES-2020-0147	https://www.regulations.gov/docket?D=FWS-R7-ES-2020-0147
Golden-cheeked warbler	FWS-R2-ES-2016-0062	https://www.regulations.gov/docket?D=FWS-R2-ES-2016-0062
Western ridged mussel	FWS-R1-ES-2020-0150	https://www.regulations.gov/docket?D=FWS-R1-ES-2020-0150

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

WP22-03 Executive Summary	
General Description	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>
Proposed Regulation	<p>Unit 2 –Wolf Hunting</p> <p><i>No limit. Sept. 1-Mar. 31.</i></p> <p><i>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.</i></p> <p>Unit 2 –Wolf Trapping</p> <p><i>No limit. Nov. 15-Mar. 31.</i></p> <p><i>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.</i></p>
OSM Preliminary Conclusion	Support
Southeast Alaska Subsistence Regional Advisory Council	
Kodiak/Aleutians Subsistence Regional Advisory Council	
Interagency Staff Committee Comments	
ADF&G Comments	

WP22-03 Executive Summary	
Written Public Comments	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

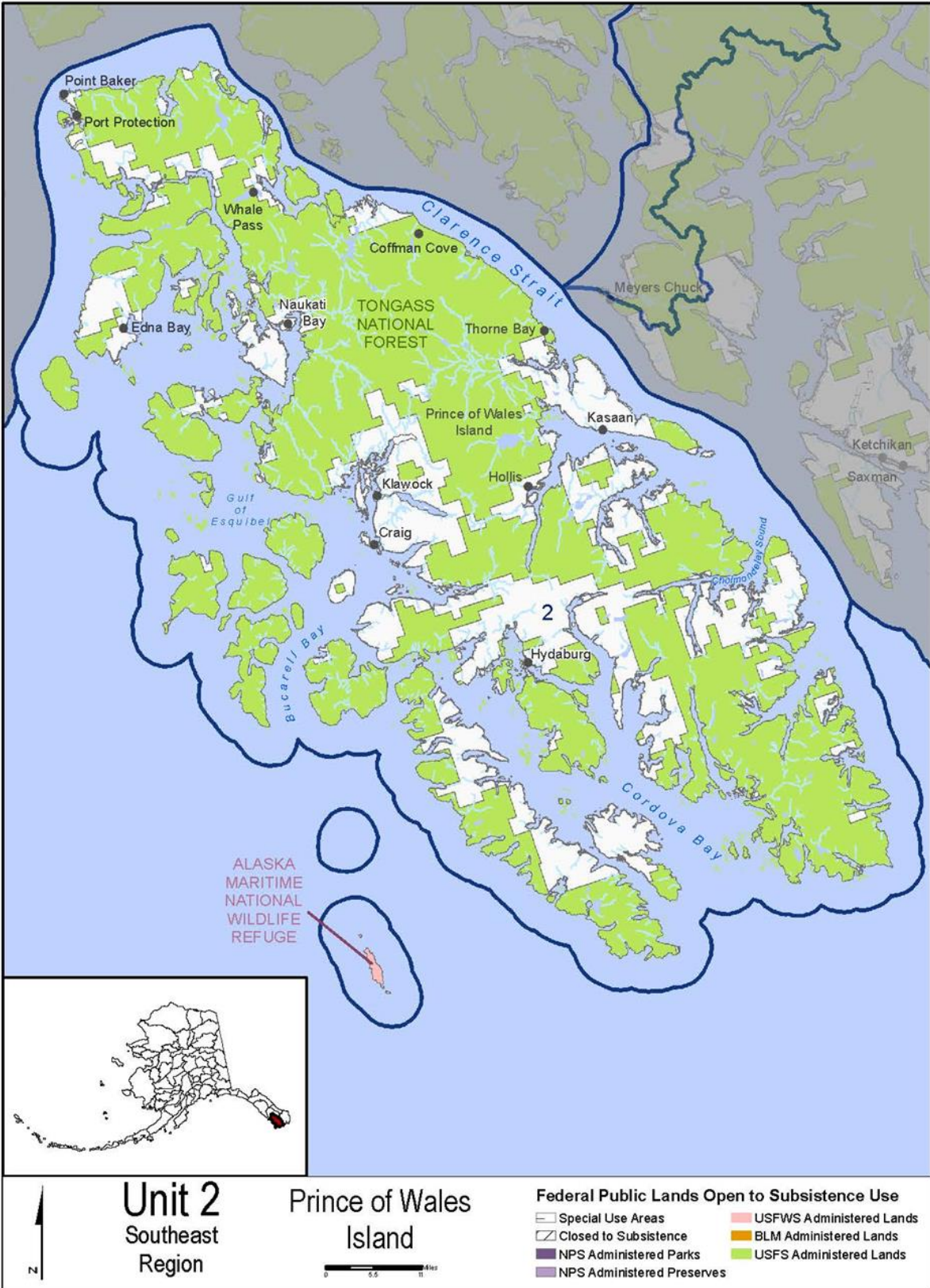
All wolves taken in Unit 2 shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.

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 km²) 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 20th 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 km², 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/km²). Above this threshold, increased road density did not correspond to increased harvest rates. Mean road density in Unit 2 is 0.62 km/km², ranging from 0-1.57 km/km² (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).

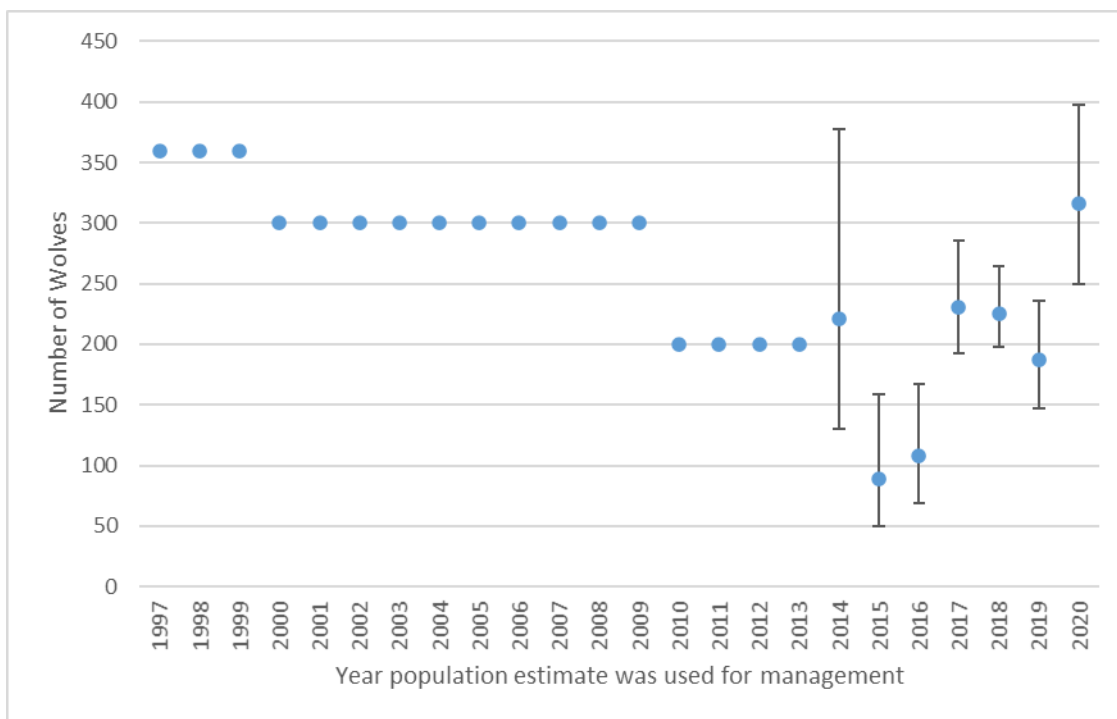


Figure 1. Unit 2 wolf population estimates, 1997-2020. Estimates from 1997-2013 are assumed from sealing records and a 1994 population estimate. Estimates from 2014-2020 are from a DNA mark/recapture study. The error bars represent 95% confidence intervals. Estimates take a year to determine; thus the 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).

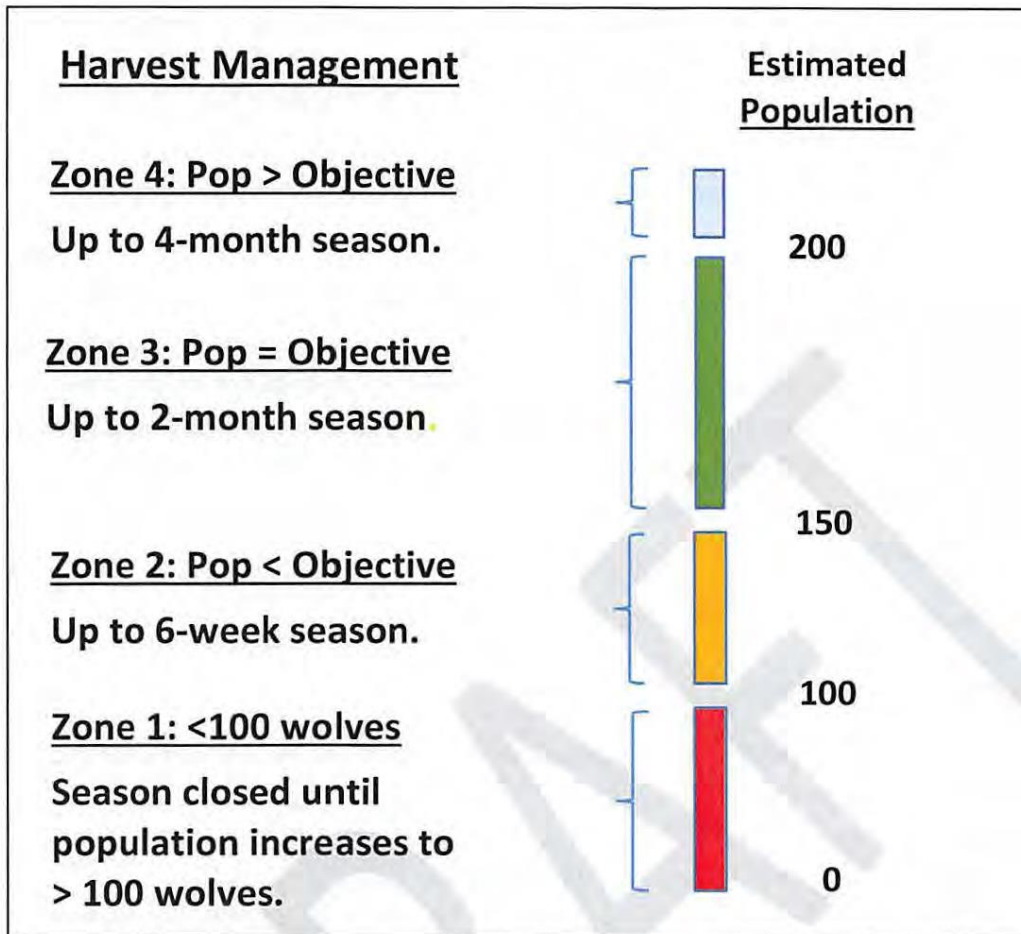


Figure 2. Population thresholds and harvest management strategies for the Unit 2 wolf population. The BOG adopted population objectives of 150-200 wolves in 2019 (figure from ADF&G 2019b).

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).

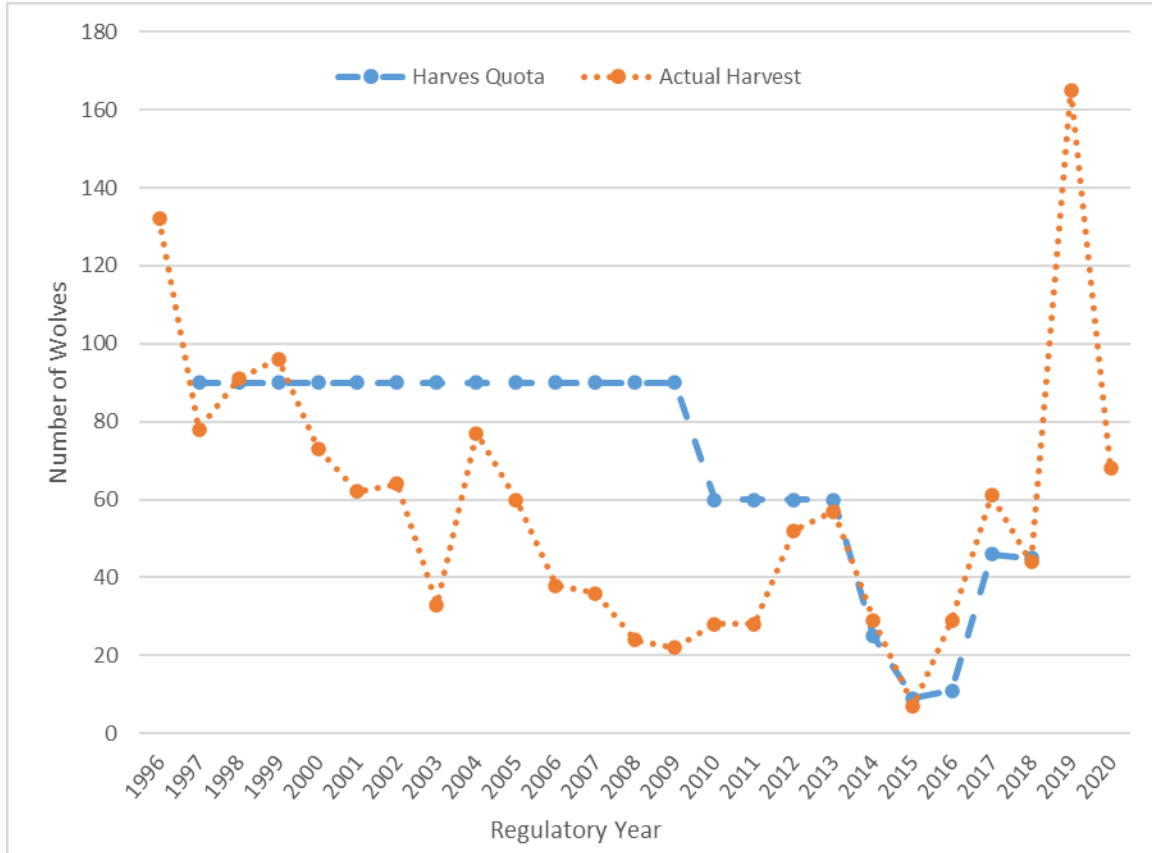


Figure 3. Unit 2 reported wolf harvest and harvest quotas, 1996-2020. Harvest includes reported harvest and other documented human-caused mortality (e.g. vehicle collisions) (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, ADF&G 2020a, 2020b).

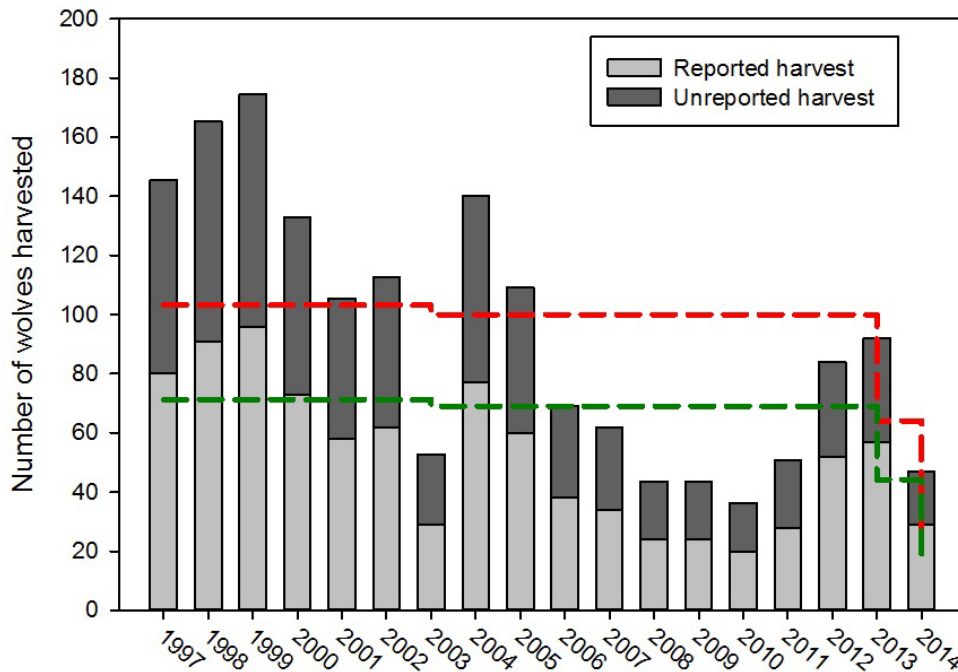


Figure 4. Estimated total number of wolves harvested by regulatory year in Unit 2, 1997-2014. Unreported harvest was estimated using a rate of 0.45 of total harvest from 1997-2011 (Person and Russell 2008) and a proportion of 0.38 of total harvest from 2012-2014 (ADF&G 2015a as cited in USFWS 2015). 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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WP22–04/05 Executive Summary											
General Description	<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>										
Proposed Regulation	<p><u>WP22-04</u></p> <p style="text-align: center;">Units 1, 2, 3, and 4—Elk</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&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;">Unit 3—Elk</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>										

WP22–04/05 Executive Summary	
	<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&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.</i></p> <p><i>Unit 3 remainder</i></p> <p style="text-align: right;"><i>No Federal open season</i></p>
OSM Preliminary Conclusion	Support Proposal WP22-04 and Oppose Proposal WP22-05.
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

**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

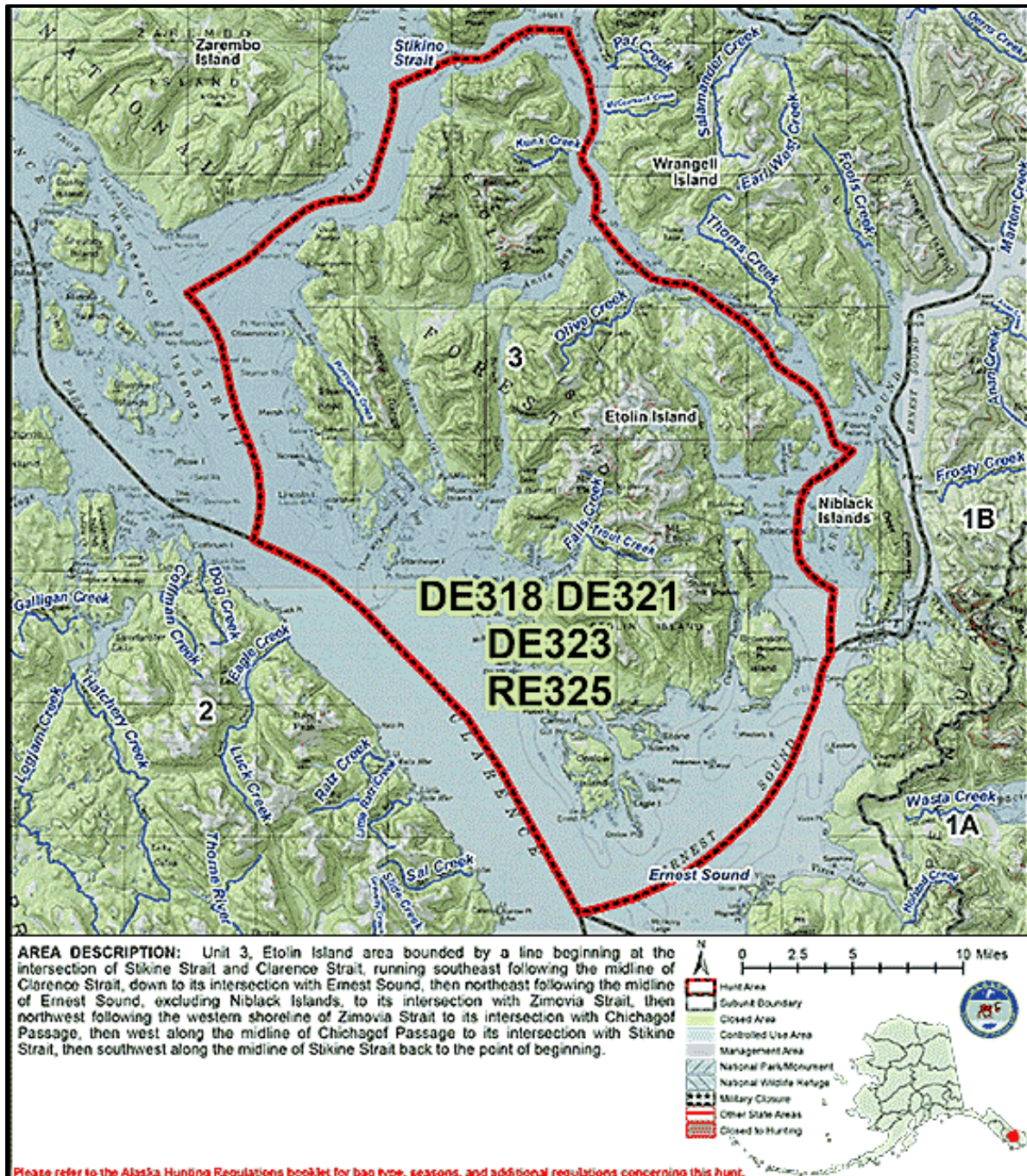
In regards to Proposal WP22-04, the proponent requests that a Federal general season be established for harvesting elk outside of the managed Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands to aid in the control of non-native elk and to provide a meaningful subsistence hunting opportunity. The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

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>1 bull by permit</i></p> <p><i>1 bull by permit</i></p> <p><i>1 bull by permit</i></p>	<p><i>DE318</i></p> <p><i>DE321</i></p> <p><i>DE323</i></p> <p><i>RE325</i></p>	<p><i>Sep. 1 – Sep. 30</i></p> <p><i>Oct. 1 – Oct. 15</i></p> <p><i>Oct. 16 – Oct. 31</i></p> <p><i>Nov. 15 – Nov. 30</i></p>
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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.

Management unit	Percentage Federal public lands	Percentage of Federal public lands managed by each agency
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 ^a
1D	43.8%	24.9% National Park Service ^a 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

^a 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.).

Year	Permits Issued	Permits Hunted	Elk Harvest
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
Total	1990	788	71
Average	181	72	6

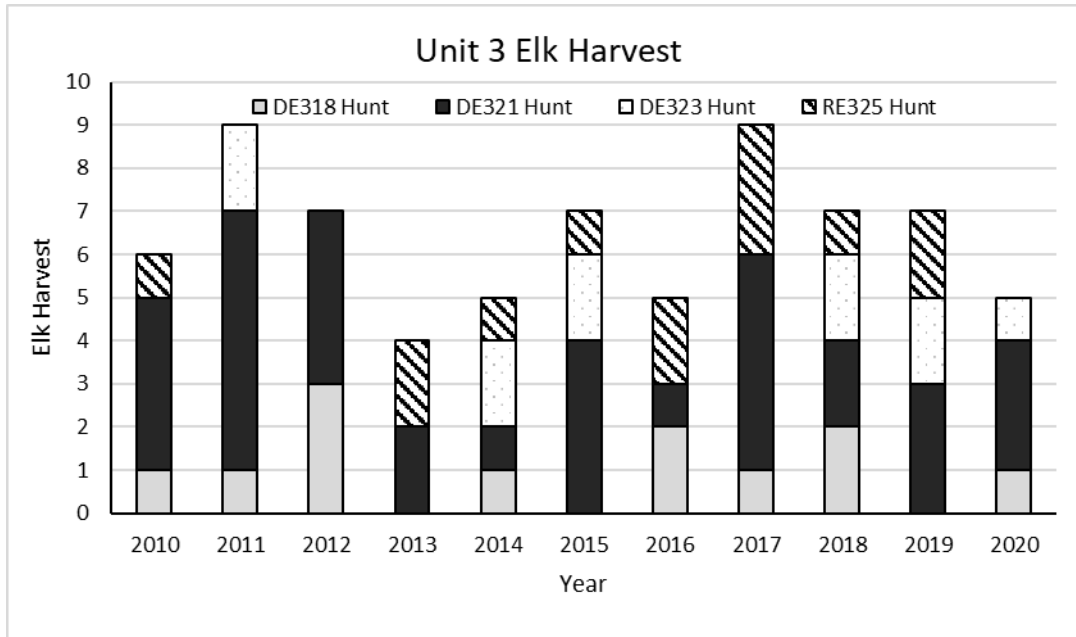


Figure 1. Unit 3 elk harvest by hunt permit DE318 Archery (Sep. 1-Sep. 30), DE321 (Oct. 1-Oct. 15), DE323 (Oct. 16-Oct. 31), and RE325 (Nov. 15-Nov. 30) from 2010-2020. Three additional bull elk were harvested between 2010-2020 through ADF&G's auction permit program. No elk were harvested during the 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%
	Total	41	58%
Non-Federally Qualified Resident Unit 1-5	Douglas	1	1%
	Juneau	6	8%
	Ketchikan	18	25%
	Total	25	35%

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

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
Total	925	446	41

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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WP22-06 Executive Summary	
General Description	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>
Proposed Regulation	<p>Unit 3—Moose</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. On Kupreanof and Kuiu Islands up to 20 bull moose may be taken by Federal draw permit.</i></p> <p style="text-align: right;"><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&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.</i></p>
OSM Preliminary Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

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.

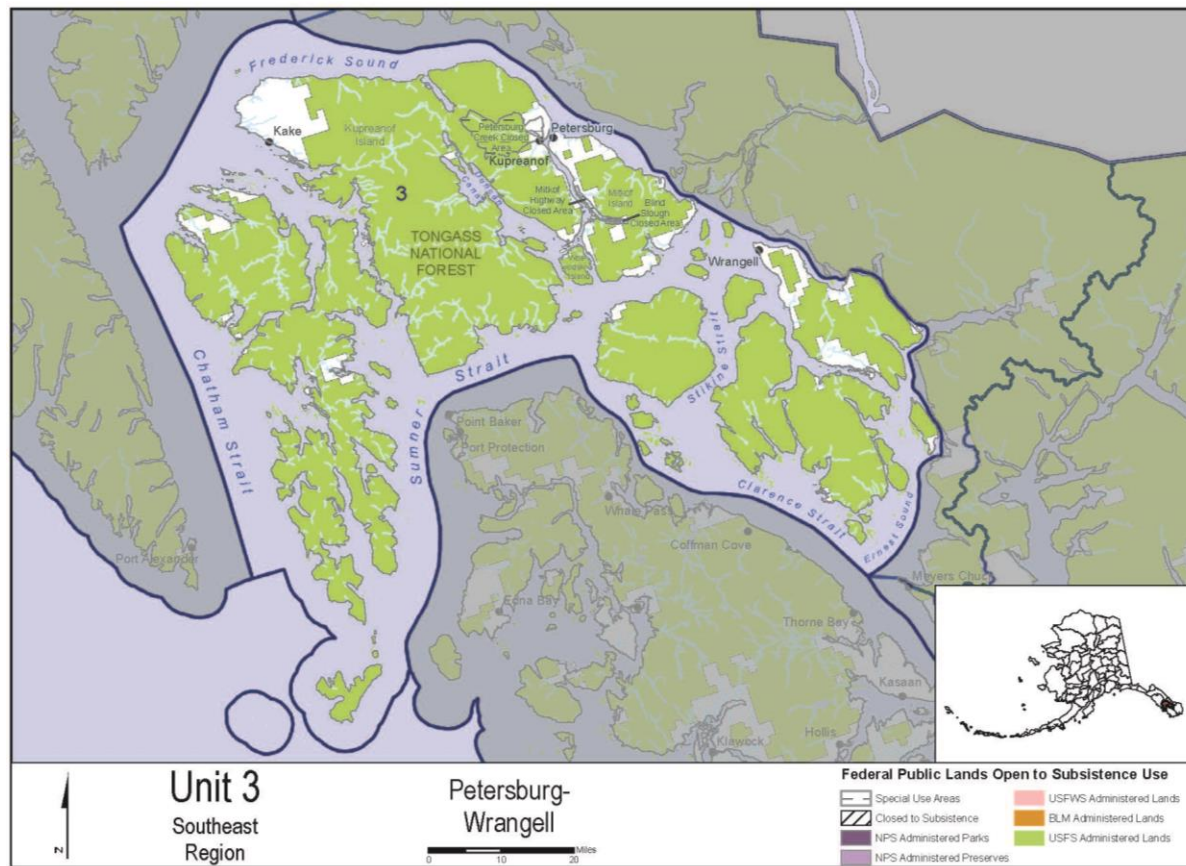
Existing State Regulation**Unit 3—Moose**

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.

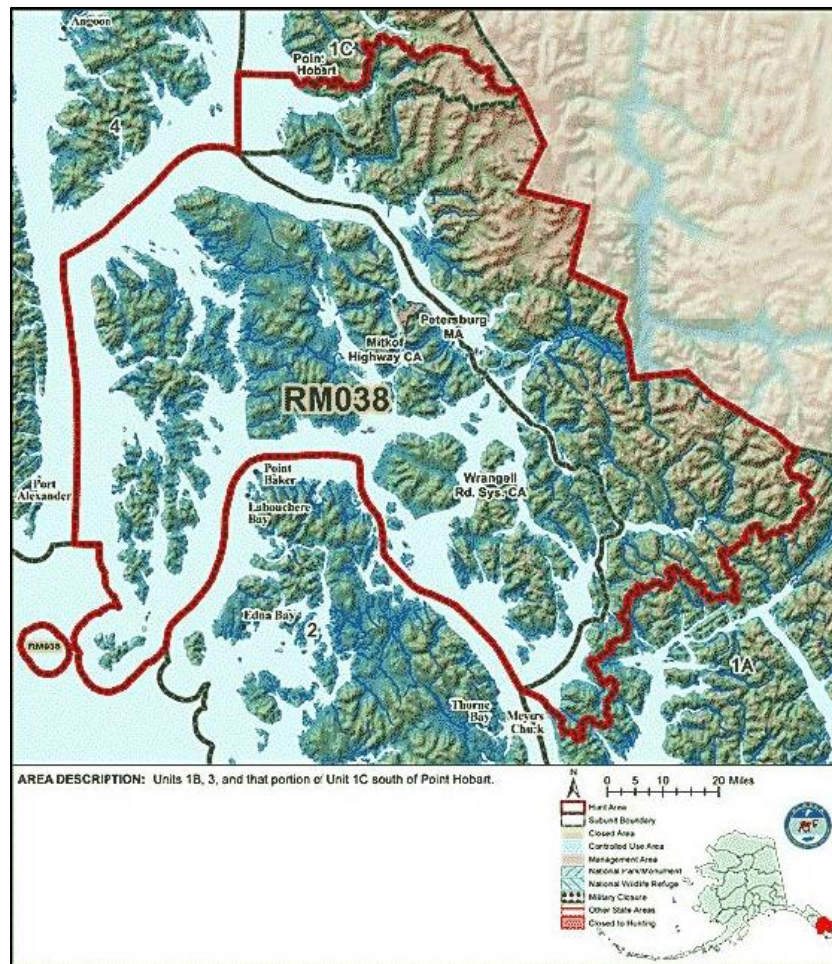
Dense brush, remote habitat and wide dispersal of moose in Unit 3 hinders aerial population estimates. After the closure of Unit 3, moose from 1968-1989 and as a result of the difficulty in acquiring population estimates, the State instated antler restrictions to maximize hunter participation while protecting 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-20th 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 ^b	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 ^c	88	0	88	5	93	2	2%	3
Avg.	60	0	60	7	67	1	2%	2

^a A regulatory year begins 1 July and ends 30 June, e.g., regulatory year 2010 = 1 July 2010–30 June 2011.

^b Includes one DLP (defense of life or property).

^c 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 ^a	Local ^b 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
Avg.	50	75%	15	22%	2	3%	67	13%	508

^a A regulatory year begins 1 July and ends 30 June, e.g., regulatory year 2010 = 1 July 2010–30 June 2011

^b 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 ^a	Local ^b 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
Avg.	410	81%	89	17%	9	2%	508

^a A regulatory year begins 1 July and ends 30 June, e.g., regulatory year 2010 = 1 July 2010–30 June 2011

^b 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

WP22-07 Executive Summary	
General Description	Wildlife Proposal WP22-07 requests that the 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. <i>Submitted by the Southeast Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	Unit 4 - Deer <i>Unit 4 — 6 deer; however, female deer Aug. 1 – Jan. 31 may be taken only from Sept. 15 – Jan. 31.</i> <i>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.</i>
OSM Preliminary Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	57 oppose, 1 neutral

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.

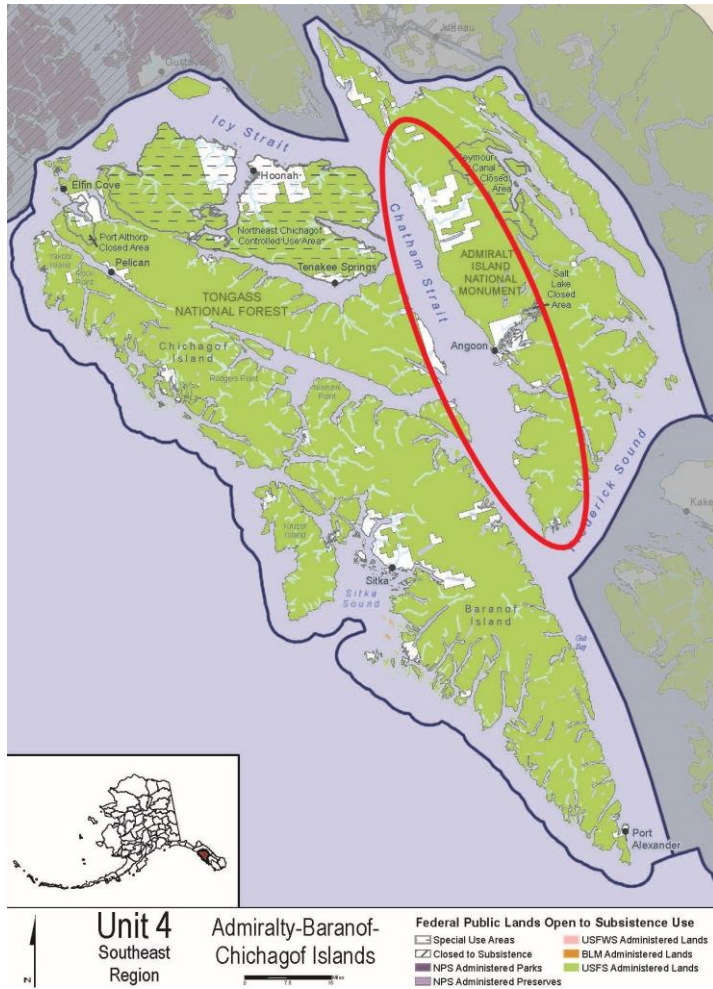


Figure 1. Unit 4 map with proposal analysis area encircled in red.

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**).

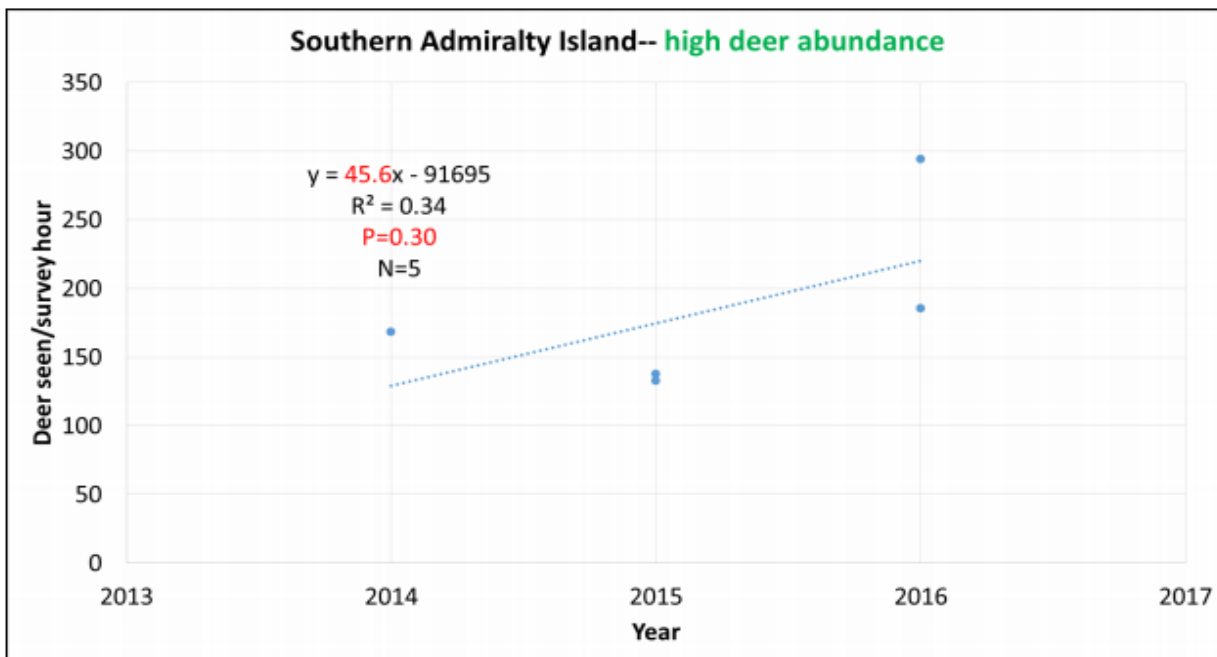


Figure 2. Number of deer observed during five aerial surveys on Admiralty Island. (Lowell and Valkenburg 2017).

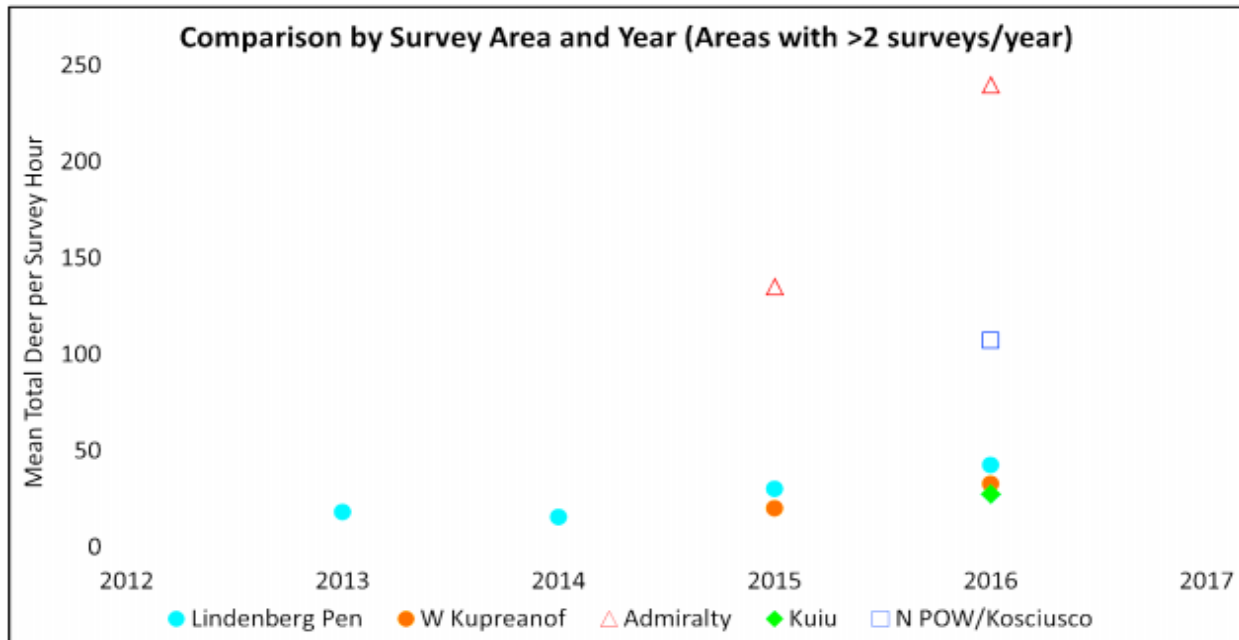


Figure 3. Average number of deer observed per hour during aerial alpine surveys in Southeast Alaska. (Lowell and Valkenburg 2017).

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**).

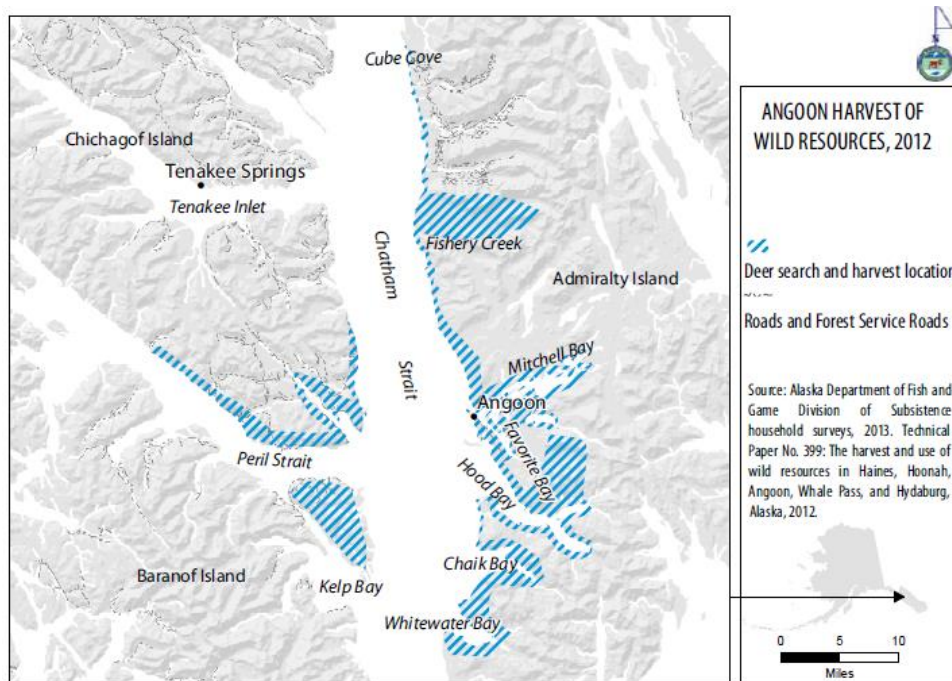


Figure 4. Reported deer hunting locations used by residents of Angoon. From Sill and Koster 2017.

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.

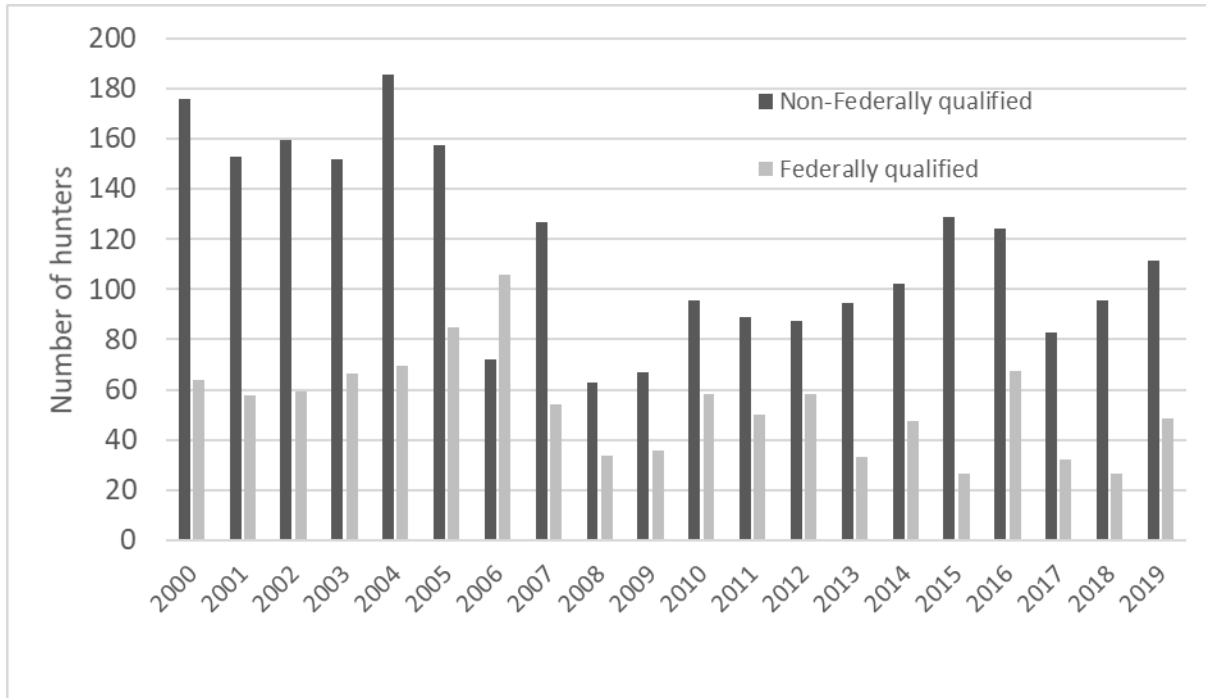


Figure 6. Number of Federally qualified and non-Federally qualified users using the proposal area, 2000-2019.

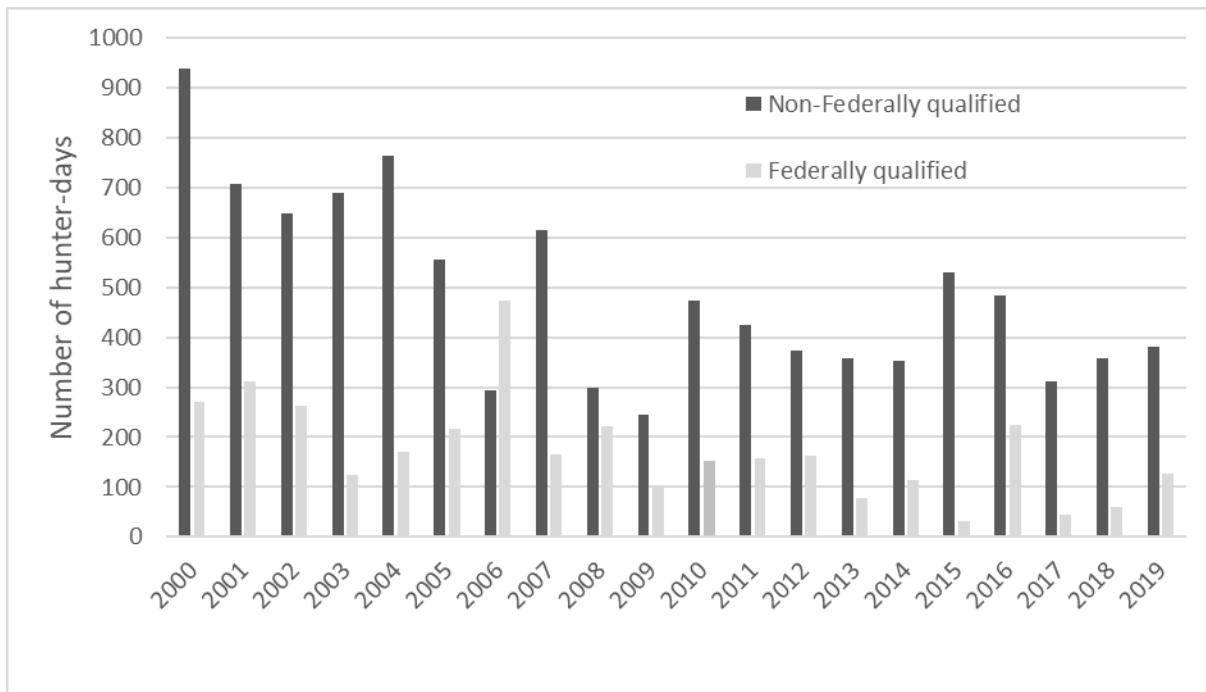


Figure 7. Number of hunter-days by Federally qualified and non-Federally qualified users within the proposal area, 2000-2019.

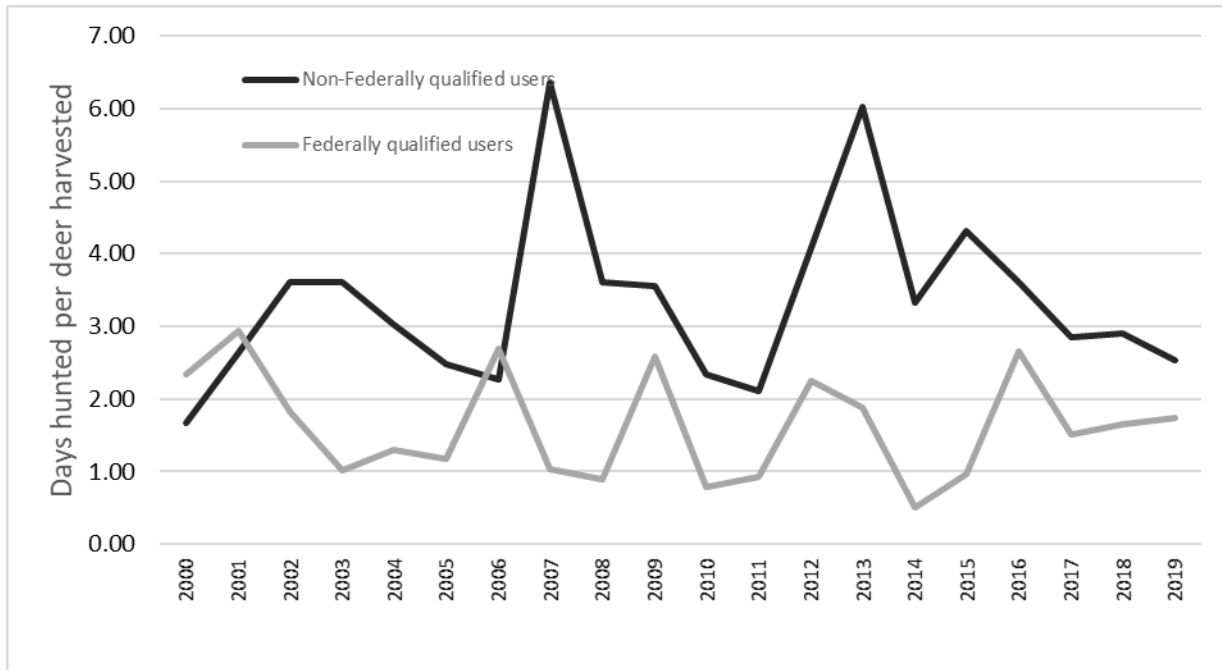


Figure 8. Number of days hunted per deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

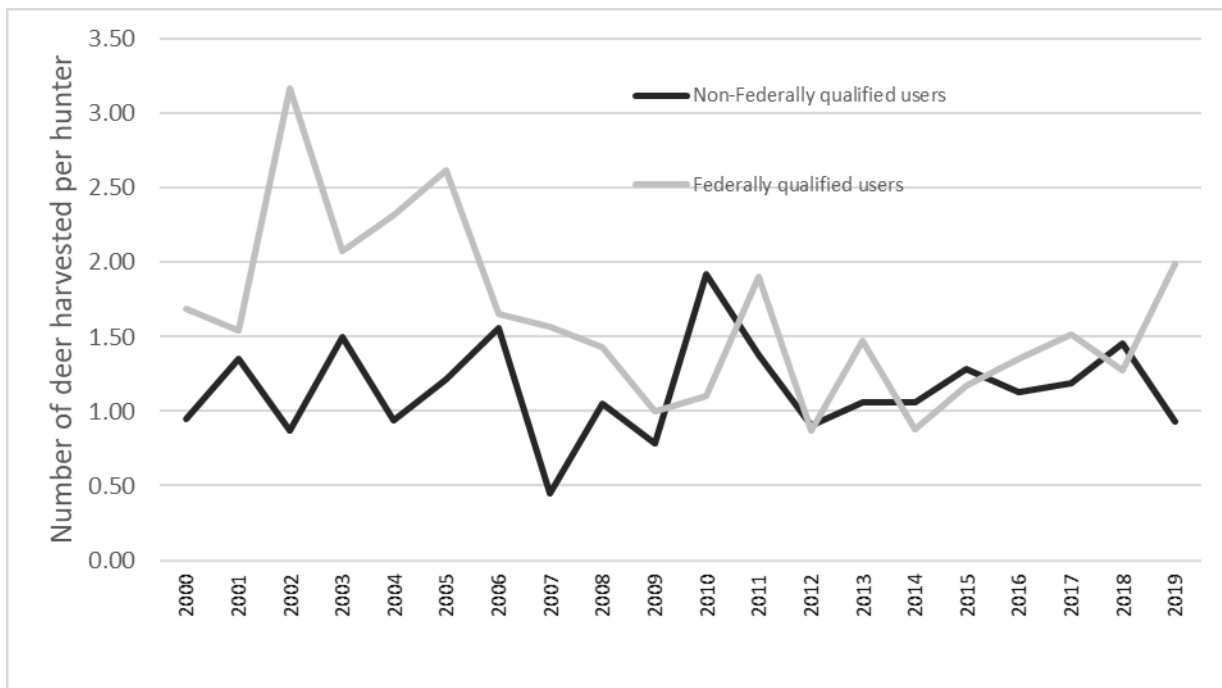


Figure 9. Number of deer harvested per hunter by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

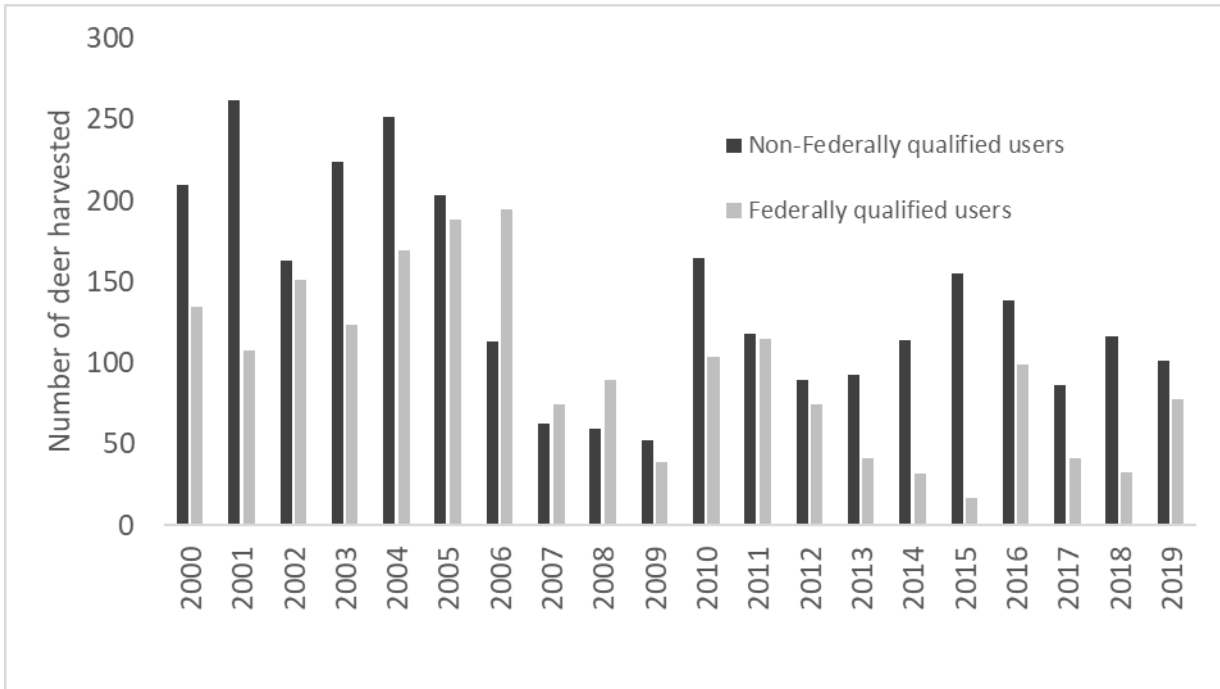


Figure 10. Number of deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

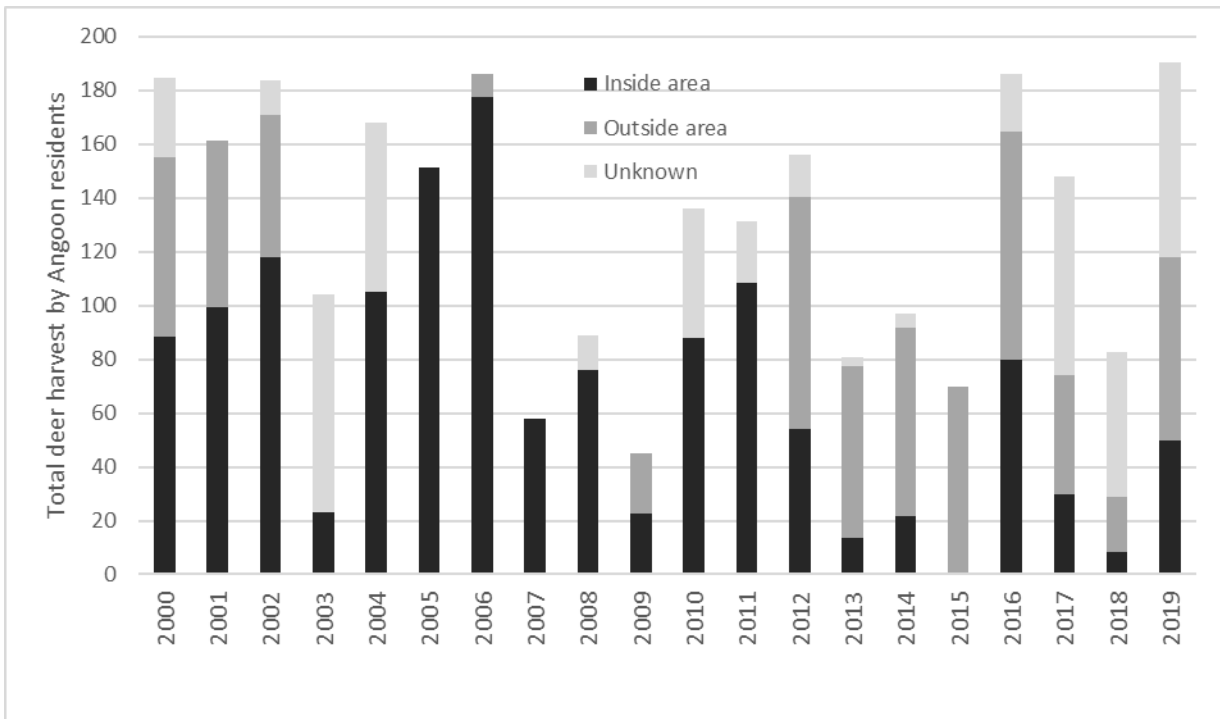


Figure 11. Total number of deer harvested by Angoon residents, by harvest location, 2000-2019.

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 Representatives 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/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.

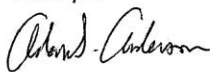
WP22-07 - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where 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

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

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 31st. 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>

**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

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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.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] FW: [External Email]Deer hunting

Perry, Deanna -FS <deanna.perry@usda.gov>

Mon 7/19/2021 1:30 PM

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

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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

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 | (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 <mattcatterson@yahoo.com>

Fri 7/16/2021 4:30 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 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

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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>

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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/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQANW...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] deer hunting proposal

Atlin Daugherty <akhomefire@yahoo.com>

Sat 7/17/2021 10:31 PM

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

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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

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7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

John Demuth <jdemuth@pndengineers.com>

Wed 6/30/2021 5:46 PM

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

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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

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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 <erickson_jared@yahoo.com>

Sat 7/17/2021 7:43 AM

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

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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>

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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 <flynn.peter@gmail.com>

Mon 7/19/2021 8:32 PM

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

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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/id/AAQkADZINDE2M2RhLWw/iOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAMg6...> 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>

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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 <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.

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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 <gilbertson@gci.net>

Tue 7/13/2021 8:08 PM

To: deanna.perry@usda.gov <deanna.perry@usda.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

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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 <Mare_e86@hotmail.com>

Mon 7/19/2021 1:24 PM

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

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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](#)

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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/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAoyD...> 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 <brookshoran@yahoo.com>

Wed 7/14/2021 9:58 AM

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

 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/AAQkADZINDE2M2RhlLW/iOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAMZ...> 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>

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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 <akchiros@gmail.com>

Mon 7/19/2021 10:34 PM

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

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

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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/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAAIj7...> 1/1

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

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

Chris klawonn <chris.klawonn@gmail.com>

Fri 7/2/2021 7:18 AM

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

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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 <pandalid@yahoo.com>

Tue 7/13/2021 11:51 AM

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

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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/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQALz8...> 1/1



**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



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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

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

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQACys...> 1/1

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Southeast proposed subsistence deer limitations

Charlie Martelle <martellec@yahoo.com>

Tue 6/29/2021 10:29 PM

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

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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 <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/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAFPo...> 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/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAAI9o...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

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

Richard Morris <akreeldeal@gmail.com>

Mon 7/19/2021 8:40 AM

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

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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>

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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/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>

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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

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07

nicholasporr <nicholasporr@yahoo.com>

Mon 7/19/2021 1:51 PM

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

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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.

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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/id/AAQkADZINDE2M2RhlWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAEqr...> 1/1



unapologetically FOR ALASKAN RESIDENTS

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web 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)).”¹

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

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

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

¹ <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 <msams@pndengineers.com>

Mon 7/19/2021 7:53 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.

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/id/AAQkADZINDE2M2RhLWVlOTgtNDQ1OS04YjQxLWE0YzY0NWl3M0NDJzQAQAOU...> 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/id/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>

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

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



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

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
 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 <stansipak@gmail.com>

Thu 7/15/2021 8:09 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,

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 <sspickler@gmail.com>

Mon 7/19/2021 10:21 PM

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

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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 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/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>

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

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 <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/id/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAP...> 1/1

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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 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 <dillonpaultomaro@gmail.com>

Mon 7/19/2021 9:06 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 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.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWWiOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZQAQAF0R...> 1/2

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 <jmunzicker@gmail.com>

Wed 6/30/2021 8:56 AM

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

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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

WP22-08 Executive Summary	
General Description	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>
Proposed Regulation	<p>Unit 4 - Deer</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><i>Non-Federally qualified users are limited to 2 male deer in the Northeast Chichagof Controlled Use Area</i></p>
OSM Preliminary Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	44 Oppose, 2 Neutral

**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

<i>Residents and Non-residents - 6 deer total</i>	<i>Bucks</i>	<i>HT Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>HT 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, 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.

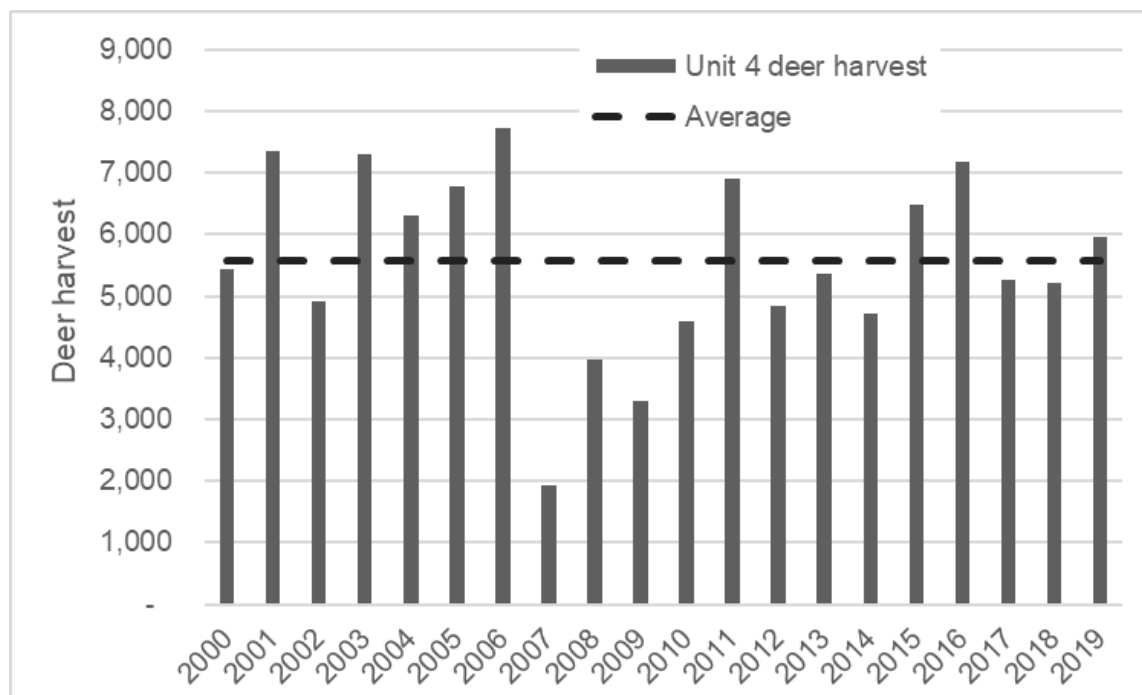


Figure 1. Unit 4 estimated annual legal deer harvest, 2000-2019.

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.

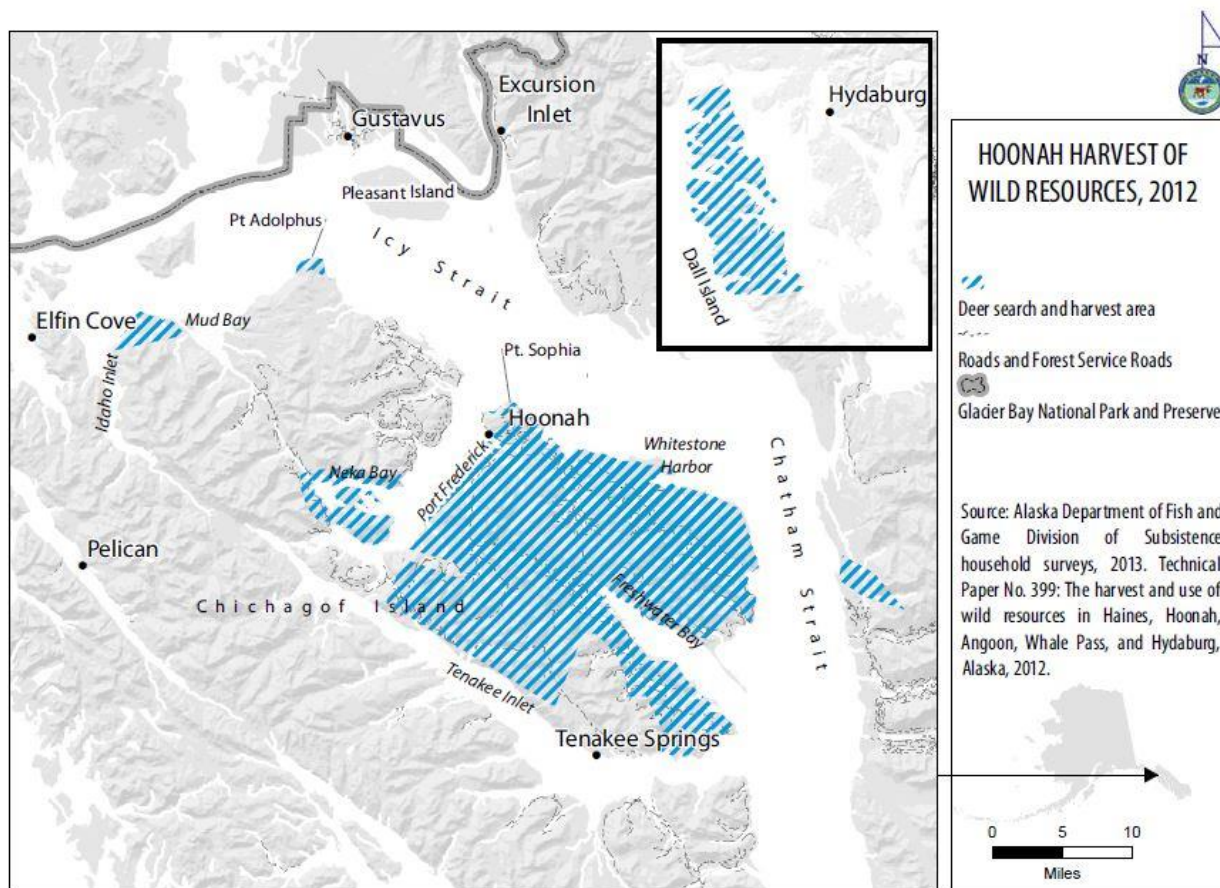


Figure 2. Reported deer hunting locations used by residents of Hoonah in 2012. From Sill and Koster 2017.

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).

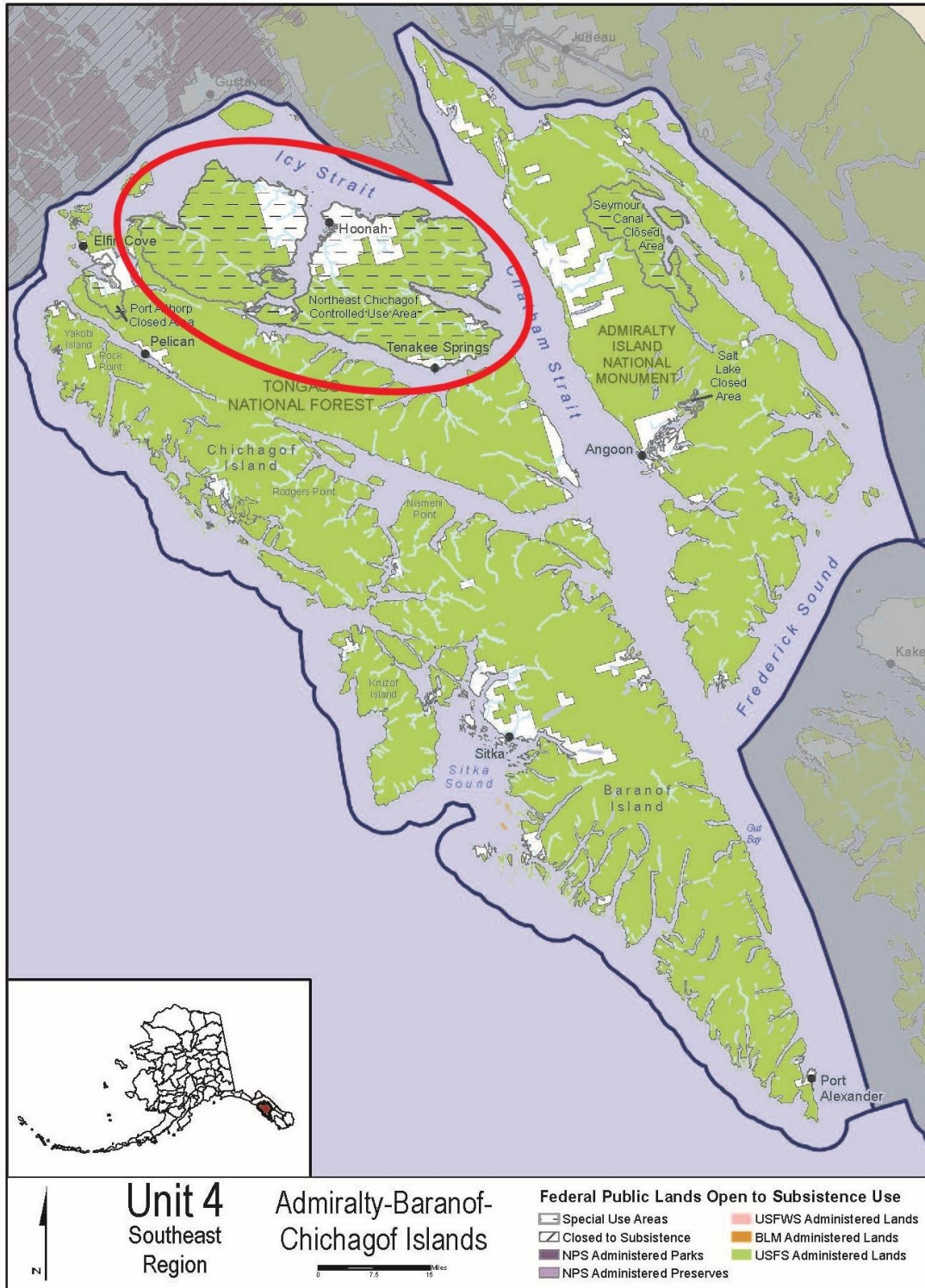
Harvest History

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

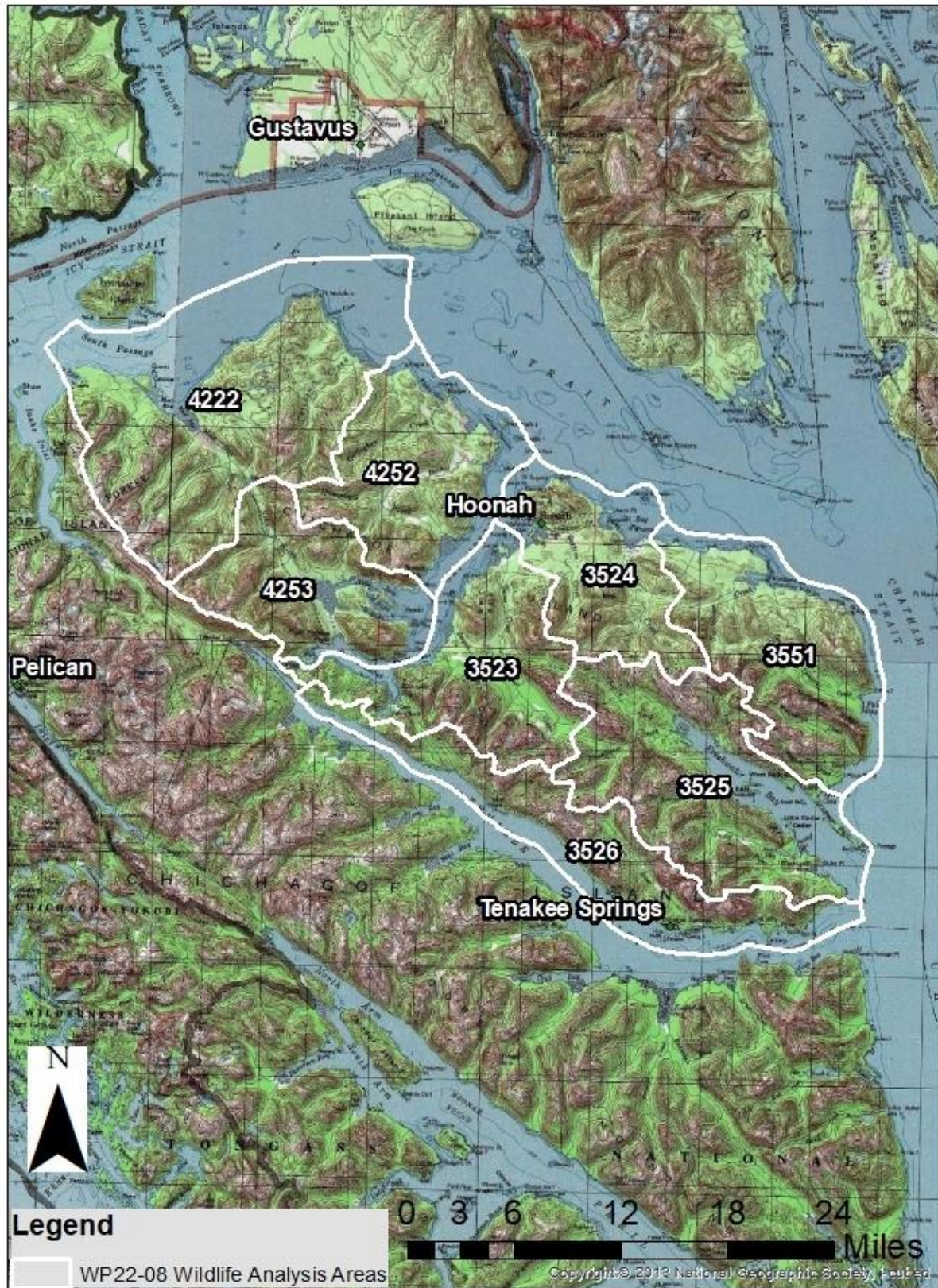
on the data. As confidence intervals are not available for these data, exact numbers should be considered estimates and used with caution. Trends, however, especially at larger scales, should be indicative of general population change. Since 2011, harvest data have been gathered through mandatory reporting. 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**).

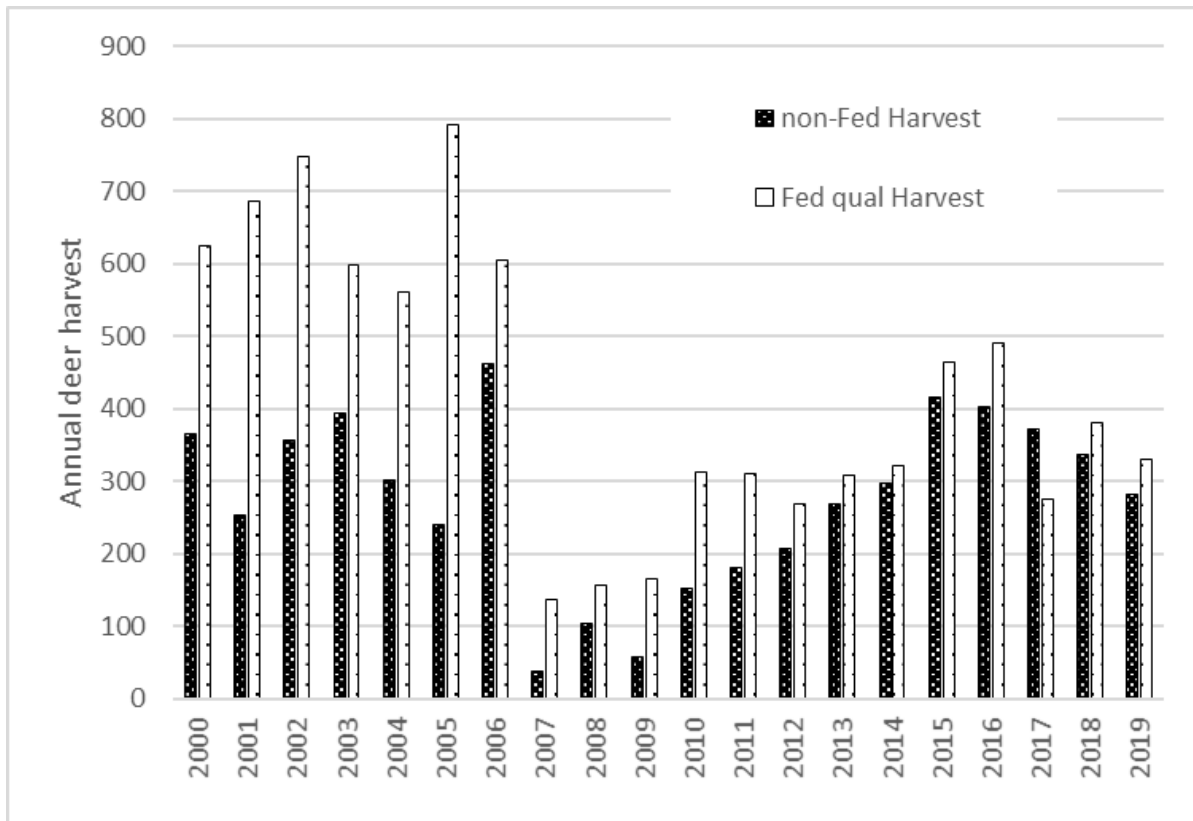


Figure 3. Annual deer harvest in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

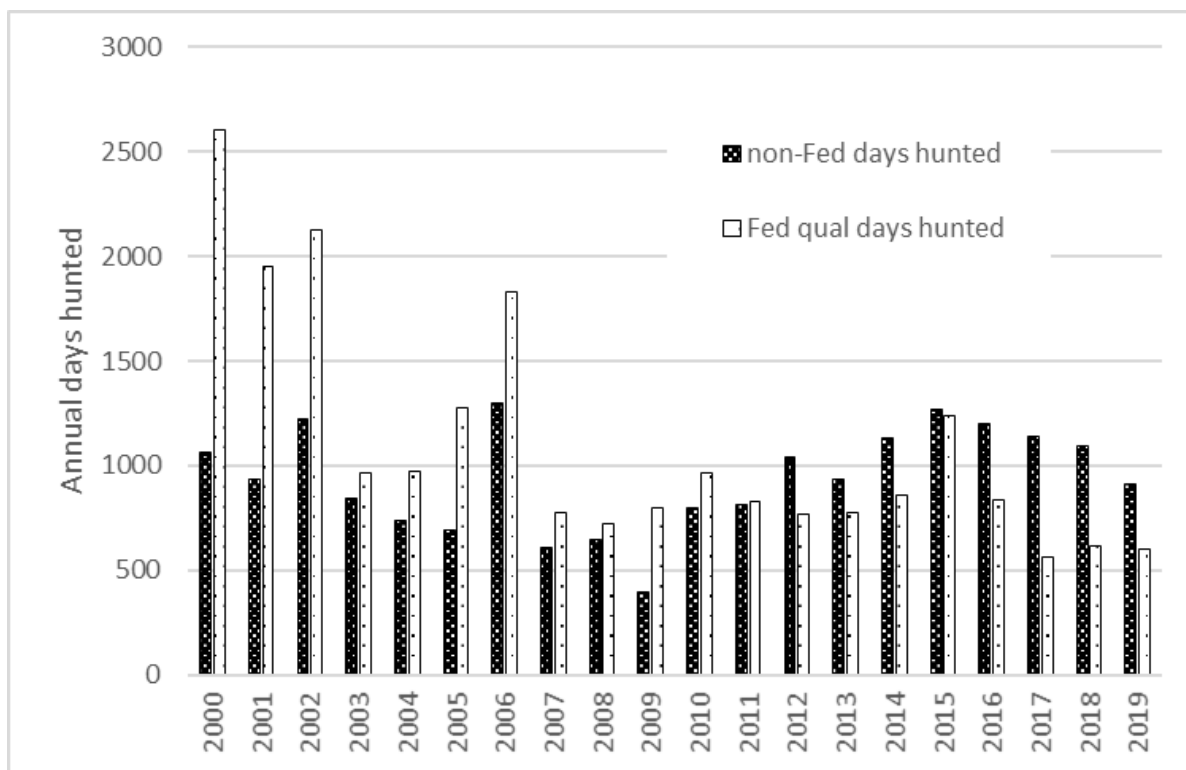


Figure 4. Annual effort, in hunter days, in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

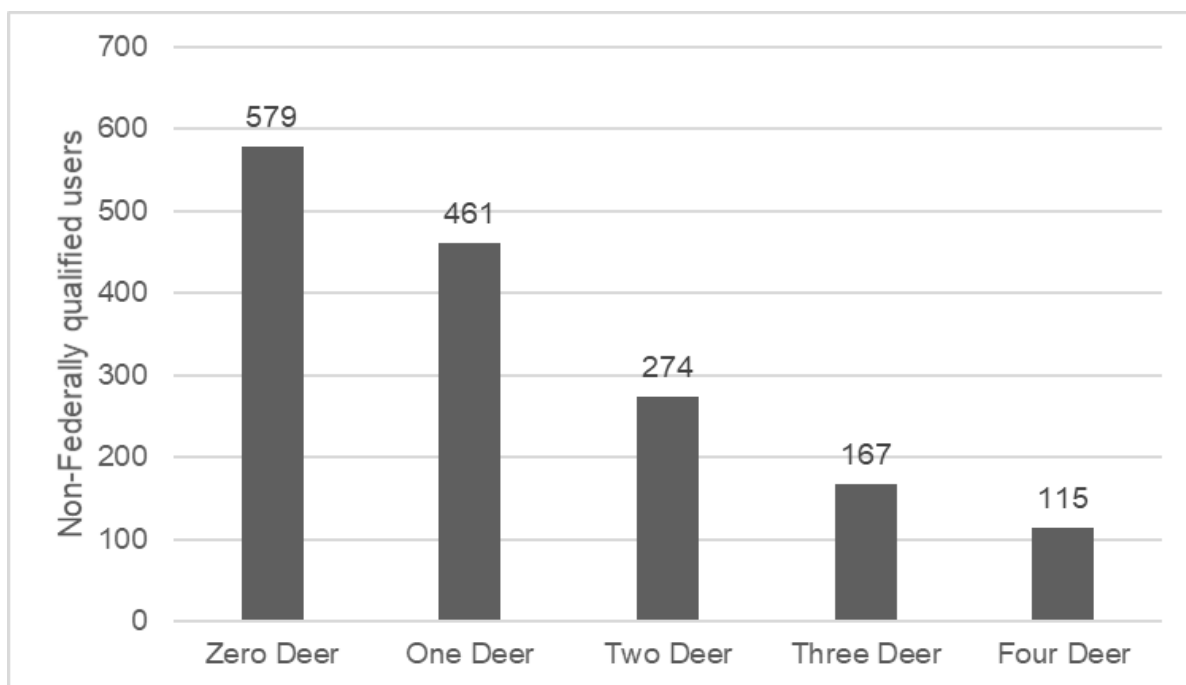


Figure 5. Average number of non-Federally qualified users harvesting 0-4 deer annually in Unit 4, 2000-2019 (ADF&G unpublished data).

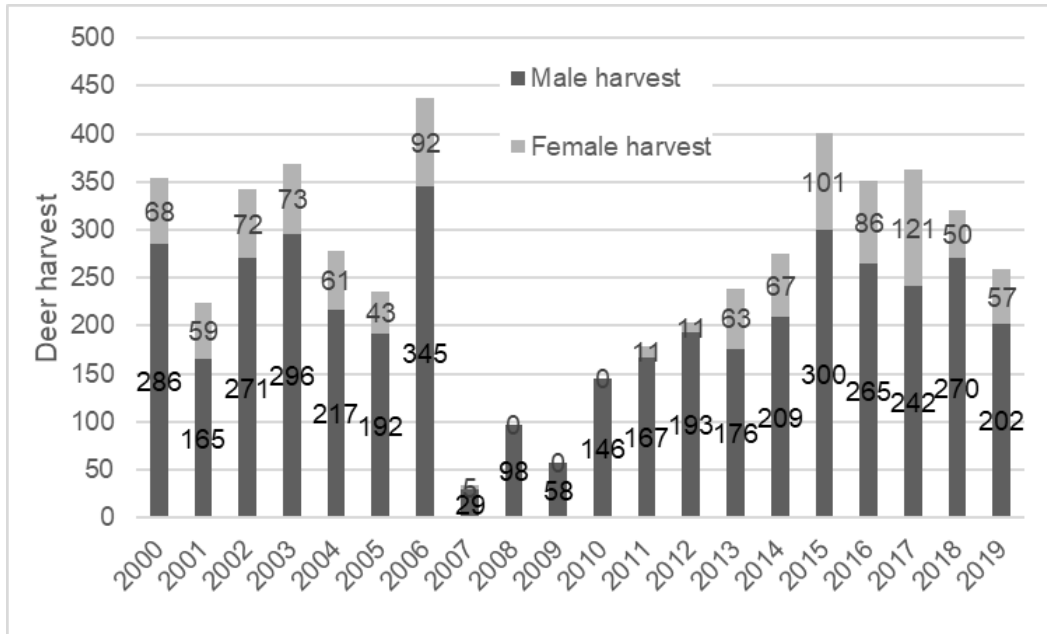


Figure 6. Number of male and female deer harvested by non-federally qualified users in NECCUA, 2000-2019. Female deer harvest was restricted 2007-2012. (ADF&G unpublished data).

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**).

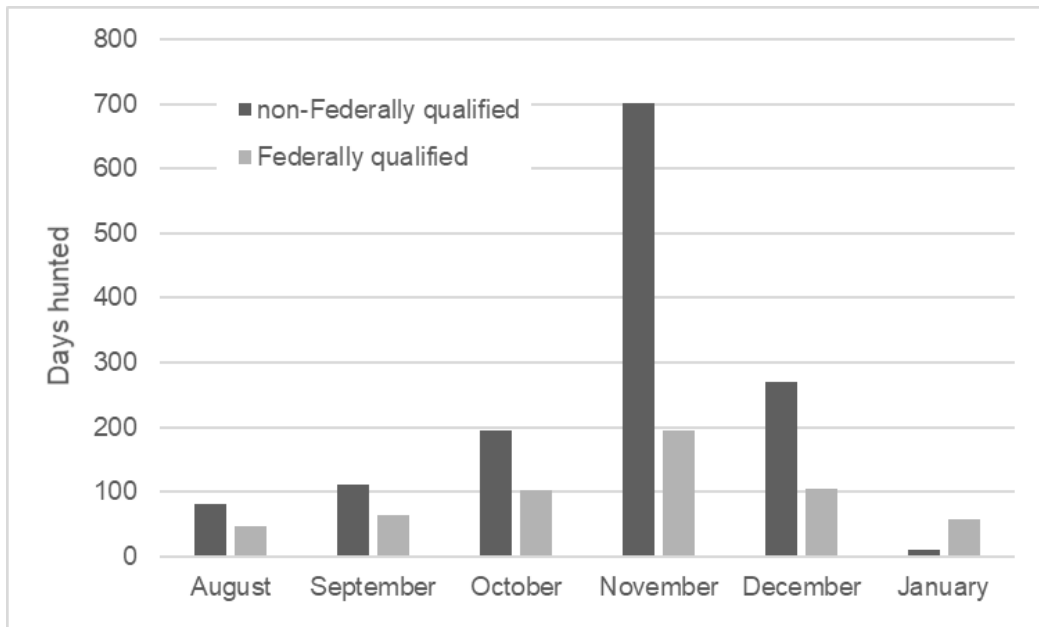


Figure 7. Average number of days hunted annually by Federally qualified subsistence users and non-Federally qualified users in Unit 4, 2000-2019 (ADF&G unpublished data).

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**).

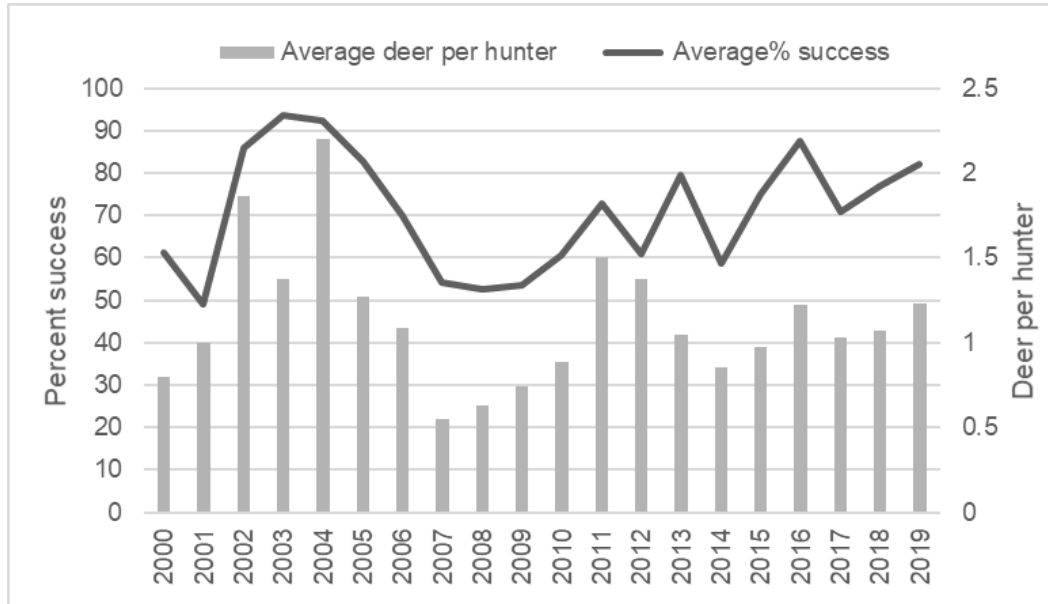


Figure 8. Hunter success rate and deer harvested per hunter for Hoonah residents hunting in Unit 4, 2000-2019 (ADF&G unpublished data).

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>

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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 Representatives 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, *Nimilchik 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.

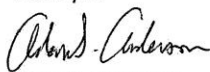
WP22-07 - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where 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

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

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 31st. 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>

**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/fid/AAQkADZINDE2M2RhlWVtOgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAEEx...> 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 | (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 <mattcatterson@yahoo.com>

Fri 7/16/2021 4:30 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 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/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQABN...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

John Demuth <jdemuth@pndengineers.com>

Wed 6/30/2021 5:46 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 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 <erickson_jared@yahoo.com>

Sat 7/17/2021 7:43 AM

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

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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>

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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/AAQkADZINDE2M2RhLWVtOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAPIS...> 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>

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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>

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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

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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>

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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](#)

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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/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 <brookshoran@yahoo.com >

Wed 7/14/2021 9:58 AM

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

 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>

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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

Search...

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 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 <akchiros@gmail.com>

Mon 7/19/2021 10:34 PM

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

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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/id/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 <chris.klawonn@gmail.com>

Fri 7/2/2021 7:18 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,

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] 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/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 <pandalid@yahoo.com >

Tue 7/13/2021 11:51 AM

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

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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

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Southeast proposed subsistence deer limitations

Charlie Martelle <martellec@yahoo.com>

Tue 6/29/2021 10:29 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 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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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/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/AAQkADZINDE2M2RhLWwIOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNJZQAQAAI9o...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

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

Richard Morris <akreeldeal@gmail.com >

Mon 7/19/2021 8:40 AM

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

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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/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

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[EXTERNAL] WP22-08 comments

nicholasporr <nicholasporr@yahoo.com>

Sun 7/18/2021 11:34 AM

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

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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

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Mark Sams <msams@pndengineers.com >

Mon 7/19/2021 7:53 AM

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

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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



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

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
 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 <stansipak@gmail.com >

Thu 7/15/2021 8:09 AM

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

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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 <pstrow@hotmail.com>

Mon 7/19/2021 5:20 PM

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

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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

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Dillon Tomaro <dillonpaultomaro@gmail.com>

Mon 7/19/2021 9:06 AM

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

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opening attachments, or responding.**

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

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Thank you for taking the time to read my comments.

Dillon Tomaro

Lifelong Southeast Alaska Hunter

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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

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7/1/2021

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[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](#)

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09

greg-donica@gci.net <greg-donica@gci.net>

Mon 7/19/2021 12:06 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>; deanna.perry@usda.gov <deanna.perry@usda.gov>

Cc: Norm and Linda Carson <nrcarson@att.net>

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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

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7/19/2021

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[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

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