



SOUTHEAST ALASKA SUBSISTENCE  
REGIONAL ADVISORY COUNCIL  
Meeting Materials

*November 5-7, 2019  
Ketchikan*





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*On the cover...*

Black bear carrying a fish, Anan Wildlife Viewing Area, Wrangell Ranger District, Tongass National Forest.



Photo by Wendy Zirngibl, USFS

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**SOUTHEAST ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL**

Cape Fox Lodge  
800 Venetia Ave, Ketchikan

November 5 – 7, 2019  
8:30 a.m. daily

**TELECONFERENCE:** call the toll free number: **1-866-560-5984** , then when prompted enter the passcode: **12960066**

**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. Please fill out a comment form to be recognized by the Council chair. 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*)

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

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

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

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

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    Chair’s Report

**8. Service Awards**

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

**10. Old Business** (*Chair*)

    a. 805(c) Report – information update (*Council Coordinator*) .....17

**11. New Business** (*Chair*)

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## 12. Agency Reports

(Time limit of 15 minutes unless approved in advance)

Tribal Governments

Native Organizations

USFS

- a. Roadless Rule Update
- b. Special Actions
- c. Prince of Wales Landscape Level Analysis Project Update
- d. Central Tongass Project Update

NPS (*Joshua Ream*)

ADF&G (*Tom Schumacher*)

OSM

**14. Future Meeting Dates\***

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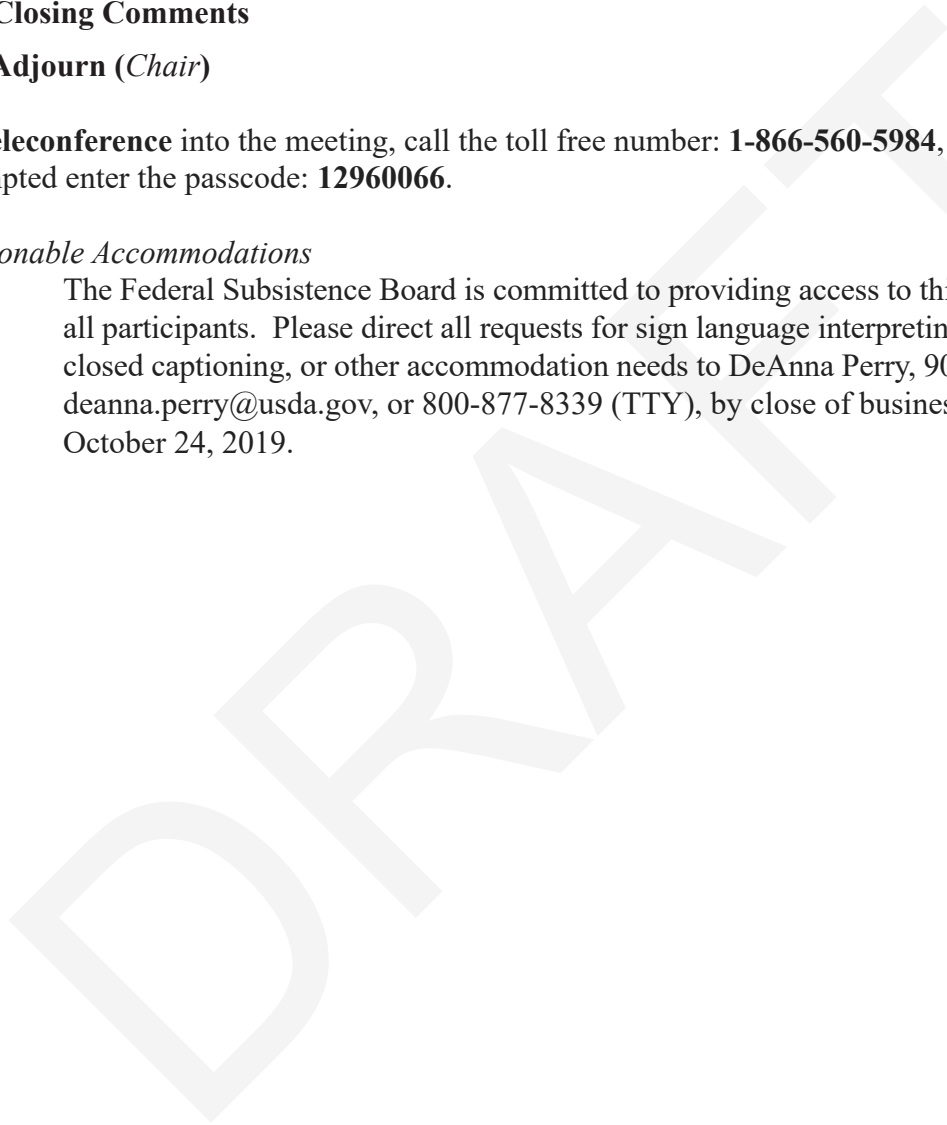
**15. Closing Comments**

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

**To teleconference** into the meeting, call the toll free number: **1-866-560-5984**, then when prompted enter the passcode: **12960066**.

*Reasonable Accommodations*

The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct all requests for sign language interpreting services, closed captioning, or other accommodation needs to DeAnna Perry, 907-586-7918, [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov), or 800-877-8339 (TTY), by close of business on October 24, 2019.



## REGION 1

### Southeast Alaska Subsistence Regional Advisory Council

Seat	Year Appointed <i>Term Expires</i>	Member Name and Community
1	2018 <b>2019</b>	<b>Elijah Winrod</b> Klawock
2	2004 <b>2019</b>	<b>Frank G. Wright Jr.</b> Hoonah
3	1993 <b>2019</b>	<b>Patricia A. Phillips</b> Pelican
4	2000 <b>2019</b>	<b>Michael A. Douville</b> Craig
5	2002 <b>2019</b>	<b>Harvey Kitka</b> Sitka <span style="float: right;"><b>Secretary</b></span>
6	2013 <b>2020</b>	<b>Robert F. Schroeder</b> Juneau
7	2014 <b>2020</b>	<b>Albert H. Howard</b> Angoon
8	2002 <b>2020</b>	<b>Donald C. Hernandez</b> Point Baker <span style="float: right;"><b>Chair</b></span>
9	2018 <b>2021</b>	<b>Ronald Leighton</b> Thorne Bay
10	2018 <b>2021</b>	<b>Harold Robbins</b> Yakutat
11	2010 <b>2020</b>	<b>John A. Yeager</b> Wrangell
12	2018 <b>2021</b>	<b>Larry Bemis, Jr.</b> Yakutat
13	2009 <b>2018</b>	<b>Cathy A. Needham</b> Juneau <span style="float: right;"><b>Vice-Chair</b></span>



## SOUTHEAST ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL

March 19 - 21, 2019

Nolan Center  
Wrangell, Alaska

Meeting Minutes

Council Coordinator DeAnna Perry provided housekeeping announcements and then the winter 2019 meeting of the Southeast Alaska Subsistence Regional Advisory Council (RAC) was officially called to order at approximately 1:00 p.m on March 19, 2019.

### Roll Call

Secretary Harvey Kitka took roll call and a quorum was established with the following Council members present for all or a portion of the three-day meeting: Elijah Winrod, Frank Wright, Michael Allen Douville, Harvey Kitka, Robert Schroeder, Albert Howard, Donald Hernandez, Ronald Leighton, John Yeager, Larry Bemis, Jr., and Cathy Needham. Patricia Phillips and Harold Robbins were excused from the meeting.

### Welcome and Introductions

The following persons attended some portion of the meeting, either in person or by teleconference:

<i>Esther Ashton</i>	<i>Wrangell</i>	<i>Wrangell Cooperative Association</i>
<i>Chris Buness</i>	<i>Wrangell</i>	<i>Wrangell Cooperative Association</i>
<i>Tony Gallegos</i>	<i>Ketchikan</i>	<i>Ketchikan Indian Community</i>
<i>Trixie Bennett</i>	<i>Ketchikan</i>	<i>Ketchikan Indian Community</i>
<i>Kevin Hall</i>	<i>Wrangell</i>	<i>Alaska Native Brotherhood Camp 14, Ketchikan</i>
<i>Raymond Paddock</i>	<i>Juneau</i>	<i>Central Council Tlingit &amp; Haida</i>
<i>Tom Doolittle</i>	<i>Anchorage</i>	<i>Office of Subsistence Management (OSM)</i>
<i>Joshua Ream</i>	<i>Anchorage</i>	<i>OSM</i>
<i>Glenn Chen</i>	<i>Anchorage</i>	<i>Bureau of Indian Affairs (BIA)</i>
<i>Mark Burch</i>	<i>Anchorage</i>	<i>Alaska Department of Fish &amp; Game (ADF&amp;G)</i>
<i>Tom Schumacher</i>	<i>Juneau</i>	<i>ADF&amp;G</i>
<i>Clarence Summers</i>	<i>Anchorage</i>	<i>National park Service (NPS)</i>
<i>Dan Sharp</i>	<i>Anchorage</i>	<i>Bureau of Land Management (BLM)</i>
<i>Wayne Owen</i>	<i>Juneau</i>	<i>U.S. Forest Service (USFS) (for Regional Forester)</i>
<i>Tom Whitford</i>	<i>Anchorage</i>	<i>USFS</i>
<i>DeAnna Perry</i>	<i>Juneau</i>	<i>USFS</i>
<i>Earl Stewart</i>	<i>Ketchikan</i>	<i>USFS</i>
<i>Tory Houser</i>	<i>Wrangell</i>	<i>USFS</i>
<i>Tyler Gunn</i>	<i>Thorne Bay</i>	<i>USFS</i>
<i>Terry Suminski</i>	<i>Sitka</i>	<i>USFS</i>
<i>Martin Hutten</i>	<i>Wrangell</i>	<i>USFS</i>

<i>Nicole Grewe</i>	<i>Juneau</i>	<i>USFS</i>
<i>Luke Decker</i>	<i>Craig</i>	<i>USFS</i>
<i>Susan Oehlers</i>	<i>Yakutat</i>	<i>USFS</i>
<i>Einar Haaseth</i>	<i>Wrangell</i>	
<i>Heather Bauscher</i>	<i>Sitka</i>	<i>Sitka Conservation Society</i>
<i>Caleb Vierkant</i>	<i>Wrangell</i>	<i>The Wrangell Sentinel</i>

Esther Ashton, tribal administrator of the Wrangell Cooperative Association, welcomed the Council and those in attendance to the area. Additional opening remarks were made by Tom Doolittle, Acting Assistant Regional Director of OSM; Wayne Owen, on behalf of the USFS Regional Forester; and Victoria Houser, Acting Wrangell District Ranger. Special welcomes were given to new council members and awards were presented to Albert Howard, Cathy Needham and Frank Wright, Jr., for 5, 10, and 15 years of council service, respectively.

### **Adoption of Agenda**

The Council unanimously supported a motion made by Harvey Kitka, seconded by Mike Douville, to adopt the agenda as a guide. Items suggested to be added to the Agenda: Customary and Traditional Use Designation discussion; Letter of Support for Yakutat Tlingit Tribe for water quality monitoring proposal; Subsistence Resource Commission appointment; Sitka Airport dock project presentation; and King Salmon closures to be discussed during the ADF&G agency report.

### **Election of Officers**

The Council unanimously re-elected Don Hernandez as Chair, Cathy Needham as Vice-Chair, and Harvey Kitka as Secretary to continue serving in their respective capacities.

### **Approval of Previous Meeting Minutes**

A motion was made by Ronald Leighton, seconded by John Yeager, to approve the minutes for the Council's previous fall meeting with one change on page 5: replace the word "spruce" with "hemlock." The Council passed the motion unanimously.

### **Council Member Reports – Summary of Comments**

*Elijah Winrod* – mentioned reports in his community of seeing fawns but, by fall there was a significant decline of fawns. This might be because of bear predation – there is not enough salmon for bears to eat, so they are targeting deer. Perhaps bear season could be opened up to non-residents again to help compensate. Sea otters are trimmed out near town by Alaska Natives. There are some Dungeness crab, but commercial interests target the crab area.

*Frank Wright* (Hoonah) – observed the impact of Huna Totem and Sealaska Native Corporations' logging industry on Hoonah. He shared that there is a significant increase in tourism in the area expected this year and is concerned that although tourism/employment is good, it is at the sacrifice of the Tribe's culture. He reported other observations such as: large

numbers of sea otters; closures for King Salmon are anticipated, even though odd years are supposed to be one of the biggest seasons for salmon; and various climate-change concerns.

*Michael Douville* (Craig) – According to observers in the area, a weaker deer harvest is expected in Unit 2 this year. The wolf population is healthy; however, the new regulations and time will help achieving more balance between deer and wolves. There are also concerns about critical winter habitat for deer as it is decreasing on the Tongass National Forest due to harvesting more old growth and no effort to transition to young growth.

*Harvey Kitka* (Sitka) – reported the community has concerns about herring. The commercial industry has been targeting older herring and the percentage of five through eight year old fish are falling to less than 10% of the quota. If these spawners are lost, there is less food available for the other species such as salmon and halibut, who depend on forage fish. Aquacultures are planned in the area and there is concern based on the invasive species brought in by the last one, which hasn't been cleaned up yet. A Sitka Tribal conservation/reintroduction program has been successful and abalone are coming back in spots. There is continued concern about sea otters and their impacts in the area.

*Robert Schroeder* (Juneau) – reported the current impacts seen in the Juneau area regarding king crab, shrimp, King Salmon, Coho, and halibut, as well as impacts sustained from the historical harvest of Auke Bay Herring. This depletion of resources shows that we are facing real ecological change. He is also concerned about climate change and the effect that increased tourism is having on subsistence resources throughout the Southeast.

*Albert Howard* (Angoon) – reported concern about the deer population and possible cause: bear predation because there is not enough salmon. Salmon are being overharvested and not making it to the streams for bears to take. The local IRA is concerned with the closure of King Salmon again and have produced a resolution. Commercial interests are emptying the bay of crab. There are fewer options for the small community because of commercial interests: if they don't get halibut, they go after salmon. If there isn't salmon, they go after deer. If no deer, they go after seal . . . but with everything becoming commercialized, the ability to find adequate subsistence resources to take care of themselves is diminished. There are concerns over resource management, such as how it will continue if the state runs out of money; that King Salmon closures happen without due process; and that deer decoys are being used to catch elders and confiscate their rifles.

Mr. Howard also read into the record a resolution to be sent to the State from the Angoon Community Association regarding the closure of the King Salmon fishery asking that King Salmon be recognized as a subsistence resource for all of Alaska Natives and subsistence users. This issue was later addressed by adding language to the Annual Report.

*Donald Hernandez* (Pt. Baker) – Local hunters had a hard time finding deer in all the traditional places and were not able to harvest deer expediently. There seem to be less hunters coming from the Ketchikan area and he believes it is because hunting has not been good in the area and those hunters may be going to other islands. Even with a little less competition, people have to go farther and utilize roadless areas to be more successful and they have to hunt longer to fill their

needs with bucks instead of does. He reported that no herring were seen in any of the bays or harbors in the area. There is an expectation of a poor Pink Salmon run this summer, based on observations of last year. There is a significant difference in the size of King Salmon being caught. He mentioned concerns about weather patterns changing and forest management and how these impact deer habitat.

*Ronald Leighton (Thorne Bay)* – reported concerns about the Sitka Herring harvest. It is believed that the bait herring fishing on the west coast of Prince of Wales is contributing to the issue because fishing is occurring where the Herring mass up and this fishing practice could wipe out streams. He mentioned his dismay at the State saying the testimony given from elders who testified about their observations was anecdotal and wasn't given much weight. Water contaminants from cruise ships are a concern and there is a belief that seaweed, goose tongue, and beach asparagus have been contaminated by cruise ship waste. He will share information regarding farmed/hatchery fisheries interfering with natural wild stocks, when he returns from a meeting this fall.

*John Yeager (Wrangell)* – reported that Wrangell has experienced low water levels and the community has been running on generators on diesel power for well over a month because they cannot run hydro power. There was low snowfall in the area and up the Stikine, which affects everything, including salmon. They had good winter King Salmon fishing, better than last summer. People in Wrangell are still concerned about transboundary mining and would like the Council to stay engaged on this issue.

*Larry Bemis, Jr. (Yakutat)* – reported that his community is having problems with King Salmon and Sockeye Salmon and referenced the subsistence, sport, and commercial closings of last summer. There is a weir that is currently less than a mile from the estuary, resulting in the fish going into the commercial zone where the mortality rate is extremely higher for those fish being released. There is a petition to move the weir back to an area where the fish that have escaped can be counted as fish going to the spawning ground. Accounting is important, especially in light of the State's intent to drop the freshwater guide license reporting log. The community has come together to put in an \$85K camera to count large King Salmon to monitor numbers. He shared observations regarding seal mortality rates, whales, sea lions, bears, the weather, and the effects that the changing climate is having on the whole ecosystem.

*Cathy Needham (Juneau)* – mentioned that there should be a report coming out soon regarding water quality monitoring on transboundary rivers. Another project in the Southeast is intensive water temperature monitoring on streams. She commended the Forest Service for inviting all of the Federally recognized tribes in Southeast Alaska to be cooperating agencies on the proposed Alaska Roadless Rule. She shared her irritation with the Board of Game (BOG) meeting earlier this year, specifically: the appointed council member to attend the meeting on behalf of the Council was unable to attend due to the furlough (lack of government funding) and that the Board did not really consider the work of the Council. She noted that there needs to be representation, outreach, and education so that BOG members or staff and the general public are aware of the work the Council performs during the decision making process. The Council has appreciated the past staff participation and how this helped the Council distribute information in a timely manner. One example of the effect of fewer staff participating in recent meetings is

that correspondence has not been drafted at the meetings, as was done in the past. A delay means information isn't getting out when it's fresh and there's no opportunity to review it before the meeting concludes.

**Chair's Report** – Don Hernandez reported that no council members or staff were allowed to attend the BOG meeting in January due to the lack of funding, and there was no chance to influence the BOG of Game's decision on wildlife issues. He reminded the Council that the Federal Subsistence Board (Board) meeting has been moved to April, also because of the lack of funding. The program will endeavor to implement proposals for this season in spite of this delay.

### **Public and Tribal comments on Non-Agenda Items**

*Heather Bauscher, Tongass Community Organizer, Sitka Conservation Society* – reported provided an update on the student class (Procedures and Practicum – University of Alaska Southeast). She thanked the Council for its engagement with these students in the past and mentioned that six students will be attending the Board meeting in Anchorage in April. She also shared concerns about potential cuts to the State's Division of Habitat and Subsistence and that this might negatively impact the relationship between the Federal and State and their ability to perform work. She expressed the importance of protecting intact ecosystems for salmon across the Tongass National Forest. Mr. Bauscher found it alarming that the whole subsistence platform was silenced during the furlough.

*Kevin Hall, Ph.D., representing Camp 14 of Alaska Native Brotherhood/Alaska Native Sisterhood (ANB/ANS)* – testified that ANB/ANS Camp 14 strongly objected to transferring Federal Subsistence Board's fisheries responsibility to the State of Alaska and ADF&G. The State does not recognize subsistence priority that would include Tribal recognition. It is believed that there is a move for the State to take over the subsistence rights currently managed by the Federal Subsistence Board.

*Trixie Bennett, Tribal councilwoman, Ketchikan Indian Community* – shared her local knowledge. She stated that the resources that indigenous people counted on as customary and traditional food, as well as their way of life, is being depleted. She spoke of herring and salmon population declines, overpopulation of predators, climate change, cruise ship discharge, the desire of co-management of species, and the lack of rural designation for the Ketchikan Indian Community.

*Kevin Frank, Angoon Community Association council member* – advised the Council of the Tribe's Traditional Food Council and the importance of King Salmon and Sockeye Salmon as subsistence resources. He mentioned the resolution (which Mr. Howard read into the record) and a letter of support (for the issues being addressed by the Sitka Tribe), submitted by the Angoon Community Association. He shared some history, traditional knowledge, and personal reflections of changes he has seen in various resources that the community relies upon for its way of life.

*Kurt Whitehead, Klawock* – Mr. Whitehead addressed the Council regarding the decline in the deer population on Prince of Wales. He and his wife operate a small hunting and fishing guide service and are year-round residents on the island. He shared that he has voluntarily suspended all deer hunting operations due to the decline in deer numbers. Through his observations and conversations, he feels there is a conservation concern and that the deer habitat is critical for survival. He advised the Council that there would be some proposals being submitted by the local Advisory Committee in an effort to help effectively manage the deer population on Prince of Wales (Unit 2).

## **Old Business**

### *Board of Game Actions of Interest*

Subsistence Program Manager, Terry Suminski, USFS, provided an overview of some of the BOG 2018/2019 regulatory actions affecting the Southeast. The Chair encouraged the Council to consider the list and decide whether it would like to form working groups and possibly submit federal regulations as a result of the State's recent actions.

### *Wolves – State Proposal #43*

The Council received a briefing from Tom Schumacher, Southeast Regional Supervisor, Division of Wildlife Conservation, ADF&G, regarding wolf management in Unit 2 (Prince of Wales Island). This included the presentation given to the BOG at its meeting and a summary of the discussion that took place on this proposal. The Council discussed reviewing the material, forming working groups to work on possible federal wolf proposals, as well as other proposals, and set a time for council members to meet in various working groups.

## **New Business**

### *Federal Wildlife Proposals*

The various Council working groups and supporting staff provided information to the entire Council. There were significant discussions regarding the Council's history with customary and traditional use determinations, to provide background information to new Council members. The Council discussed proposals that it would like to submit for the Federal Subsistence Wildlife Regulatory Process, which occurs every two years alternating with Federal Subsistence Fisheries Proposals.

Council Action: The Council crafted the following proposals to be submitted for consideration by the Federal Subsistence Board at the winter 2020 meeting.

**Wolf – Hunting:** Eliminate the harvest limit/quota and revise sealing requirement for wolves in Unit 2.

**Wolf – Trapping:** Eliminate the harvest limit/quota and revise sealing requirement for wolves in Unit 2.

**Deer:** Revise hunt areas, season dates and harvest limits for Unit 3.

**Beaver:** Revise trapping season dates in Units 1 - 4.

**Black Bear C&T:** Revise Customary and Traditional Use Determinations for Units 1 through 5.

**Brown Bear C&T:** Revise Customary and Traditional Use Determinations for Units 1 through 5.

**Elk C&T:** Establish Customary and Traditional Use Determinations in Unit 3.

**Goat C&T:** Revise Customary and Traditional Use Determinations for Units 1 through 5.

**Moose C&T:** Revise Customary and Traditional Use Determinations for Units 1 through 5.

#### *Temporary Special Action Request*

The Council discussed the need for a temporary special action request to change the harvest limit and sealing period for wolves in Unit 2. The Federal regulations conflict with recent BOG actions. The intent is for the Federal in-season managers to use their delegated authority to collaborate with ADF&G in setting the wolf hunting and trapping season length to facilitate management of the fall wolf population objective of 150-200 animals in Unit 2 for the upcoming season.

**Council Action:** Albert Howard moved to submit the Temporary Special Action. Seconded by Mike Douville. Passed unanimously.

#### *Council Charter Review*

The Council received an overview of the Council's Charter by the Council Coordinator and the Council reviewed and discussed the Charter. The Council had a question about the "1.15" staff support listed in the Charter and Acting Assistant Regional Director of OSM, Tom Doolittle, advised the Council that this reflected the amount of staff support for the Council as over one person.

**Council Action:** The Council took no action on the Charter; however, it did request that a letter be sent to the Board, asking that it send a letter to the Secretaries of Agriculture and Interior, requesting additional support and that the Secretaries review the Charter and consider increasing the amount of staff support obligated for the Council, and reflect the increase in the current "1.15" staff number in the Charter.

#### *Annual Report*

Council Coordinator, DeAnna Perry, presented an overview of the Council's FY2018 annual report. The Council had no additional topics to add to the list.

Council Action: The Council approved the annual report with a few minor additional sentences to existing topics.

## Agency Reports

### *Tribal Governments*

Yakutat Tlingit Tribe (YTT) – Jennifer Hanlon, Environmental Director, YTT, advised that the Tribe is seeking support for its proposal for an Environmental Regulatory Enhancement Grant. The group is looking to expand their water quality monitoring programs on the Yakutat Forelands.

Council Action: The Council unanimously supported a motion made by Don Hernandez, seconded by Mike Douville, to provide a letter of support for YTT's proposal.

### *USDA Forest Service*

- *Alaska Roadless Rule Updates:* Nicole Grewe, Regional Economist and core member of the Alaska Roadless rulemaking team, gave a presentation on the Alaska Roadless Rule. The Draft Environmental Impact Statement (DEIS) is not yet available for public review but is expected to be released around mid-summer. There are six alternatives that run the span of a no action alternative to a full exemption request by the State of Alaska. The Council shared comments about: the Roadless Team continuing to work during the shutdown; the concerns of the effects of the proposed rule such as stem exclusion; old growth deer winter habitat; predation on deer (a significant subsistence resource); the importance of ANILCA 810 analysis and hearings; and land use designation (LUD) II areas remaining protected. (Ms. Grewe advised that the agency interpretation of ANILCA 810 is that the roadless rulemaking is not the withdrawal, reservation, leasing or otherwise permitting of the land. She also advised that there will be upcoming subsistence public meetings in various communities upon release of the DEIS. Forest Supervisor, Earl Stewart, stated that testimony given in public hearings is critical and necessary.

Council Action: The Council voted unanimously to form a working group to follow the Alaska Roadless Rule issue and bring back information to the Council at its next meeting. Motion was made by Don Hernandez and seconded by Albert Howard. Working group members include: Don Hernandez, Bob Schroeder, Mike Douville, and Patty Phillips, with Albert Howard as an alternate.

Council Action: The Council unanimously supported a motion by Don Hernandez, seconded by Albert Howard, to send two letters:

- Requesting that the Board forward the Council's March 5, 2019, letter to the Secretary of Agriculture
- Advising of the Council's concern regarding Section 810 determinations



Council Action: The Council unanimously supported a motion by Robert Schroeder, seconded by Don Hernandez, to send a letter to the Forest Service that memorialized the comments and questions concerning the Roadless Rule from this meeting.

Council Action: The Council discussed its desire to hold a special meeting to discuss the DEIS, once it is published, so that they can provide comments as a Council within/during the public comment period. The Council also discussed, at length, that it was unable to pick a date to announce their findings on the record before the DEIS is released due to the three-month time span that the Secretary's review may or may not take. It is anticipated that this meeting would occur in mid-summer. The Council voiced its strong desire to hold a special meeting on the issue, to be scheduled once a firm date for the release of the DEIS is known. This would be held via teleconference and be announced for public participation.

- *Special Actions:* Subsistence Program Manager, Terry Suminski, provided a summary of Federal Special Actions taken in the last calendar year in the Southeastern Alaska and Yakutat areas.
- *Updates:* Mr. Suminski provided an overview on the Stikine River Federal subsistence salmon fishery, the new Pacific Salmon Treaty, and the 2019 fisheries forecast. Tony Gallegos, Ketchikan Indian Community member, joined Mr. Suminski to provide updates on Eulachon and also the planned activities where tribes will be assisting the Forest Service with monitoring.
- *Prince of Wales Landscape Level Analysis (POW LLA) Update:* Tongass National Forest Supervisor, Earl Stewart, provided a status update of the POW LLA project. He explained some of the history of the project, which was designed to integrate projects, maximize efficiencies, and use some of the new farm bill authorities under stewardship. Tyler Gunn, Acting District Ranger for POW, reported on timber harvests and future planned cutting. There is a workshop scheduled for April 6 in Klawock to help prioritize some aspects of the project. Mr. Stewart addressed questions from the Council regarding old growth/new growth timber harvest transition and cumulative impacts resulting in a conservation concern for deer. Luke Decker, Craig Ranger District, provided additional details regarding wolf den buffers.
- *Central Tongass Projects Update:* Mr. Stewart, provided a status update of the Central Tongass project. A specific recommendation has not yet been received. And the DEIS is on track for this summer. He encouraged engagement when the draft is published to see how it will affect resources and programs over the next 10-15 years. Mr. Stewart fielded questions from the Council regarding limited deer hunting opportunities in Central Tongass, the need for ANILCA 810 hearings, and government-to-government consultations. The Council encouraged more research put into this area. It is anticipated that there will be a 45-day comment period once the draft environmental impact statement is posted.

*Bureau of Land Management*

Brenda Becker, from the Glennallen Field Office, advised the Council of BLM's receipt of an application for a dock in Sitka. Mr. Kitka shared that the dock is proposed in an area where herring normally spawn, if not bothered. The dock would be installed after May 1<sup>st</sup> and then be in place year-round. Public comment on this project is open until April 15, 2019. The Council expressed an interest in knowing what response the Sitka Tribe may provide on this issue and Ms. Becker committed to keeping the Council Coordinator informed.

*Office of Subsistence Management*

Tom Doolittle, Assistant Regional Director, provided a program update, including staffing changes. He provided a status report on the request for reconsiderations received on Unit 2 deer (RFR18-01) and Berners Bay moose (RFR18-02). He also gave a brief overview of how ANILCA 804 is being handled by the Board by sharing an example. He thanked the Council members for their work.

Joshua Ream, anthropologist, provided updates on fisheries programs: Partners for Fisheries Monitoring and the Fisheries Resource Monitoring Program. He explained that the Board may implement a system of temporary special actions to cover approved changes to fisheries regulations due to the delay, due to the lack of government funding, and resulting furlough because the revised regulations will not be in place for the standard April 1 start date.

*Alaska Department of Fish and Game*

Tom Shumacher presented information to the Council regarding the State's regulation that allows ceremonial harvest of game, mostly for funerary or memorial services. He also informed the Council of recent personnel changes within ADF&G.

Dave Harris, Juneau Management Biologist, addressed the Council's questions regarding a Chinook Salmon closure for sport fishermen, how that affects subsistence fishing in the villages, and the process required to institute that closure. He also talked about the salmon's life cycle, problems with the marine environment, and management approaches.

Mark Burch, Special Projects Coordinator, provided answers to questions from the Council regarding the Freshwater Logbook Program. There is a proposed change to eliminate the log book since it is no longer funded by a license fee. The Council had a significant discussion on this topic and there are concerns about the elimination of this program resulting in a lack of important data.

Council Action: The Council unanimously supported a motion made by Albert Howard, seconded by John Yeager, to submit comments to the Board of Fish outlining the importance of the logbook and its role in managing the resource.

Council Action: The Council unanimously supported a motion made by Don Hernandez, seconded by Albert Howard, to submit a letter to the Forest Service informing them of the

Council's concerns over the elimination of the State Freshwater Logbook Program and it would be in the interest of the Federal Subsistence Program that information be gathered by the Forest Service through its permitting process and user guide operations on freshwater streams to help compensate that loss of information.

*National Park Service*

Clarence Summers, Subsistence Manager, NPS, explained the process for this Council to make a Subsistence Resource Commission (SRC) appointment. He provided the names of those eligible and interested persons to the Council for deliberation.

Council Action: Motion made by Mike Douville, seconded by Albert Howard, to appoint Sam Demmert to Wrangell-St. Elias National Park SRC. Motion carried unanimously.

Council Action: Motion made by Mike Douville, seconded by Albert Howard, to appoint Council member, Larry Bemis, Jr., as an alternate SRC member. Motion carried unanimously.

The Council also asked that Mr. Demmert be permitted to attend a Council meeting so that a relationship with the Resource Commission could be maintained. Mr. Summers committed to take that back to the Park Superintendent.

*Future Meetings*

The fall 2019 Council meeting was set for November 5 – 7, 2019, in Ketchikan.

The winter 2020 Council meeting was set for the week of February 24<sup>th</sup>, 2020 (probably Feb 25-27) in Petersburg.

The Council meeting adjourned at approximately 5:15 p.m. on March 21, 2019.

*I hereby certify that, to the best of my knowledge, the foregoing minutes are accurate and complete.*

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DeAnna Perry, DFO  
USFS Subsistence Management Program

*November, 2019*

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Donald Hernandez, Chair  
Southeast Alaska Subsistence Regional Advisory Council

*November, 2019*

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

DRAFT



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

## Federal Subsistence Board

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



FOREST SERVICE

**JUN 19 2019**

OSM 19029. KW

Don Hernandez, Chair  
Southeast Alaska Subsistence Regional Council  
c/o Office of Subsistence Management  
1011 East Tudor Road, M/S 121  
Anchorage, Alaska 99503-6199

Dear Mr. Hernandez:

The Federal Subsistence Board (Board) met on April 15-18, 2019, regarding proposed changes to subsistence fish and shellfish regulations. This letter and the enclosed report identify action taken on proposals affecting residents of the Southeast Alaska Region.

Section 805(c) of the Alaska National Interest Lands Conservation Act (ANILCA) provides that the Board will accept the recommendations of a Regional Advisory Council regarding take unless (1) the recommendation is not supported by substantial evidence, (2) the recommendation violates recognized principles of fish and wildlife management, or (3) adopting the recommendation would be detrimental to the satisfaction of subsistence needs. When a Council's recommendation is not adopted, the Board is required by Secretarial regulations to set forth the factual basis and reasons for the decision. This letter and enclosure satisfy that requirement.

Out of twenty proposals submitted, one was withdrawn by a proponent and the Board accepted the majority recommendations of the Regional Advisory Councils, in whole or with modifications, on 18 of the 19 proposals. Details of these actions and the Boards' deliberations are contained in the meeting transcriptions. Copies of the transcripts may be obtained by calling toll free number, 1-800-478-1456, and are available online at the Federal Subsistence Management Program website, <https://www.doi.gov/subsistence>.

The Board uses a consensus agenda on those proposals where there is agreement among the affected Subsistence Regional Advisory Council(s), a majority of the Interagency Staff Committee, and the Alaska Department of Fish and Game concerning a proposed regulatory action. These proposals were deemed non-controversial and did not require a separate discussion. The consensus agenda contained two proposals affecting the Southeast Region,

Mr. Hernandez

2

which the Board deferred to the Southeast Subsistence Regional Advisory Council (Council) recommendation as follows: the Board *adopted* proposal **FP19-17** to change the customary and traditional use determinations (C&T) for the Yakutat and the Southeast Alaska Region so that all residents of Southeast and Yakutat would have a positive C&T determination for all fish. The Board also adopted proposal **FP19-18** to change the 5.5 inch stretched mesh gillnet restriction to 6.25 inch stretched mesh in the Sockeye Salmon and Coho Salmon fisheries on the Stikine River.

The remaining proposal **FP19-19**, affecting the Southeast Region appeared on the non-consensus agenda. However, for this proposal, the Board took action consistent with the Council's recommendation to *adopt* the proposal to close Federal public waters of Neva Lake, Neva Creek, and South Creek to the harvest of Sockeye Salmon by non-Federally qualified users. The Board found that the low abundance of Sockeye Salmon, the resulting reduced harvest limits, and the perception of user conflicts are the primary reasons for the decline in subsistence use of this resource. The proposal would help reduce the user conflicts in a location with documented unreported harvest and enforcement issues.

The Federal Subsistence Board appreciates the Southeast Alaska Subsistence Regional Advisory Council's active involvement in and diligence with the regulatory process. The ten Regional Advisory Councils continue to be the foundation of the Federal Subsistence Management Program, and the stewardship shown by the Regional Advisory Council chairs and their representatives at the Board meeting was noteworthy.

If you have any questions regarding the summary of the Board's actions, please contact DeAnna Perry, Council Coordinator, at 907-586-7918 or [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov).

Sincerely,



Anthony Christianson, Chair  
Federal Subsistence Board

Enclosure

cc: Federal Subsistence Board  
Southeast Alaska Subsistence Regional Advisory Council members  
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management  
Jennifer Harding, PhD, Acting Deputy Assistant Regional Director, Office of Subsistence Management  
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management  
Katerina Wessels, Acting Council Coordination Division Supervisor, Office of Subsistence Management  
DeAnna Perry, Council Coordinator, U.S. Forest Service  
Interagency Staff Committee  
Administrative Record

## FEDERAL SUBSISTENCE BOARD 805(c) REPORT

April 15-18, 2019

Anchorage, Alaska

Section 805(c) of the Alaska National Interest Lands Conservation Act provides that the “Secretary ... shall consider the report and recommendations of the regional advisory councils concerning the taking of fish and wildlife on the public lands within their respective regions for subsistence uses.” The Secretary has delegated authority to issue regulations for the take of fish and wildlife to the Federal Subsistence Board. Pursuant to this language in Section 805(c), the Board defers to the Council’s recommendations. However, Section 805(c) also provides that the Board “may choose not to follow any recommendations which [it] determines is not supported by substantial evidence, violates recognized principles of fish and wildlife conservation, or would be detrimental to the satisfaction of subsistence needs.” The purpose of this report is to detail how the Board’s action differed from the Council’s recommendations based on these criteria.

### SOUTHEAST AREA PROPOSALS

#### **Proposal FP19-19: to close the Federal waters of Neva Lake, Neva Creek, and South Creek to the harvest of Sockeye Salmon by nonfederally qualified subsistence users**

DESCRIPTION: Proposal FP19–19 requests that the Federal public waters of Neva Lake, Neva Creek, and South Creek be closed to the harvest of Sockeye Salmon by non-Federally qualified users. *Submitted by Calvin Casipit of Gustavus.*

#### COUNCIL RECOMMENDATIONS:

Southeast Alaska Subsistence Regional Advisory Council – **Support**

#### BOARD ACTION: **Adopt**

JUSTIFICATION: The proposed regulation would provide Federally qualified subsistence users a subsistence priority to this resource in Federal public waters of Neva Lake, Neva Creek and South Creek. The low abundance of sockeye salmon, the resulting reduced harvest limits, and the perception of user conflicts, are the primary reasons for the decline in subsistence use of this resource. The proposal would help reduce the user conflicts in a location with documented unreported harvest and enforcement issues.

## **Presentation Procedure for Proposals**

- 1. Introduction and presentation of 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 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 analysis
- 9. Restate final motion for the record, vote**



<b>WP20–01 Executive Summary</b>	
<b>General Description</b>	Proposal WP20–01 requests that the Federal Subsistence Board (Board) repeal the Federal season for moose in Unit 1C Berners Bay. <i>Submitted by: Alaska Department of Fish and Game</i>
<b>Proposed Regulation</b>	<p><b>Unit 1C - Moose</b></p> <p><del>Unit 1C — Berners Bay drainages —1 bull by Federal drawing permit. Only one moose permit may be issued per household. A household receiving a State permit for Berners Bay drainages moose may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&amp;G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of bull moose permits</del></p> <p><b>No Federal open season Sept. 15–Oct. 15 (will be announced starting in 2019)</b></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>2 Support</b>

## DRAFT STAFF ANALYSIS WP20-01

### ISSUES

Wildlife Proposal WP20-01, submitted by the Alaska Department of Fish and Game (ADF&G), requests that the Federal season for moose in Unit 1C, Berners Bay be rescinded.

### DISCUSSION

The proponent states that the Federal subsistence moose hunt in Berners Bay amounts to a restriction to non-Federally qualified users, which conflicts with the Federal Subsistence Boards (Board) Closure Policy. The proponent requests that the Board rescind the Federal moose hunt in Berners Bay because there is no demonstrated conservation concern and Federally qualified subsistence users are provided significant moose hunting opportunity throughout Unit 1C and the remainder of Southeast Alaska. The proponent states that subsistence uses will not be affected, there will be little effect on sport/recreational and commercial uses, and there will be no impact to the Berners Bay moose population.

### Existing Federal Regulation

#### Unit 1C - Moose

*Unit 1C — Berners Bay drainages — 1 bull by Federal drawing permit. Sept. 15-Oct. 15 (will Only one moose permit may be issued per household. A household be announced starting receiving a State permit for Berners Bay drainages moose may not in 2019) receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of bull moose permits*

### Proposed Federal Regulation

#### Unit 1C - Moose

*~~Unit 1C — Berners Bay drainages — 1 bull by Federal drawing permit. Sept. 15-Oct. 15 (will Only one moose permit may be issued per household. A household be announced starting receiving a State permit for Berners Bay drainages moose may not in 2019) receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of bull moose permits~~*

**No Federal open season**

## Existing State Regulation

### Unit 1C - Moose

*Unit 1C Berners Bay drainages only – One bull by permit DM041*

*Sept 15 – Oct 15*

### Extent of Federal Public Lands

Unit 1C is comprised of approximately 95% Federal Public Lands and consist of 62% U.S. Forest Service (USFS) managed lands and 33% National Park Service (NPS) managed lands (**see Unit Map**). Berners Bay drainages are comprised of approximately 97% Federal public lands and consist of 97% USFS managed lands.

### Customary and Traditional Use Determination

Rural residents of Units 1, 2, 3, 4 and 5 have a customary and traditional use determination for moose in Unit 1C, including the Berners Bay drainages.

### Regulatory History

#### State regulatory history

State harvest regulations for moose in Unit 1C, including Berners Bay are summarized in **Table 1**. The State has managed the hunt under a draw permit system since 1978, with the exception of 1985, when it was a Tier II hunt due to a change in State law. No permits were issued for the 2007-2013 seasons due to conservation concerns. ADF&G began issuing draw permits again in 2014 when five bull permits were issued. Five permits were issued for bulls in 2015 and 2016 while seven bull permits were issued in both 2017 and 2018.

**Table 1.** State of Alaska and Federal moose hunting regulations for Unit 1C, including Berners Bay drainages, since 1959 (Sell 2017, pers. comm.).

Year	Season	Season	Limit	Conditions and Limitations
1959	Open	Sept 15-Oct 15	One	One bull, except Berners Bay drainages (closed)
1960-1961	Open	Sept 15-Oct 15	One	One bull, except Berners Bay drainages (closed)
1962	Open	Sept 15-Oct 15	One	One bull S. of Endicott-Sherman line; except Berners Bay drainages (closed)
1963-1964	Open	Sept 1-Oct 15	One	One bull, North of the latitude of the Endicott-Sherman line
1965-1967	Open	Sept 1-Oct 15	One	One moose, antlerless moose from 10/14 to 10/15 only
1968	Open	Sept 1-Oct 15	One	One moose
1969-1970	Open	Sept 1-Oct 15	One	One moose, closed after 50 antlerless moose are taken

Year	Season	Season	Limit	Conditions and Limitations
1971-1973	Open	Sept 15-Oct 15	One	Berners Bay drainages, one moose by permit only, up to 40 permits issued
1974	Open	Sept 15-Oct 15	One	Berners Bay drainages, 50 moose by permit only
1975-1977		No open season		Berners Bay drainages only
1978-1979	Open	Sept 15-Oct 15	One	Berners Bay drainages, one bull by drawing permit, up to 20 permits issued
1980-1982	Open	Sept 15-Oct 15	One	Berners Bay drainages, one bull by drawing permit, up to 25 permits issued
1983-1984	Open	Sept 15-Oct 15	One	Berners Bay drainages, one antlerless moose by drawing permit, up to 15 permits issued
1985	General	No open season		Berners Bay drainages
1985	State Subsistence	Sept 15-Oct 15	One	Berners Bay drainages, one moose by Tier II permit, up to 15 permits may be issued
1986	General	Sept 15-Oct 15	One	Berners Bay drainages, one moose by drawing permit, up to 7 permits issued
1987-1990	General	Sept 15-Oct 15	One	Berners Bay drainages, one moose by drawing permit, up to 5 permits issued
1991-1992	General	Sept 15-Oct 15	One	Berners Bay drainages, one moose by drawing permit, up to 10 permits issued
1993-2000	General	Sept 15-Oct 15	One	Berners Bay drainages, one moose by drawing permit, up to 20 permits issued
2001-2007	General	Sept 15-Oct 15	One	Berners Bay drainages, one moose by drawing permit, up to 30 drawing permits issued
2008-2013	General	No open season	-	Berners Bay drainages
2014-2016	General	Sept 15-Oct 15	One	Berners Bay drainages, one moose by drawing permit, up to 5 drawing permits issued
2017-2018	General	Sept 15-Oct 15	One	Berners Bay drainages, one moose by drawing permit, up to 7 drawing permits issued
1990-2018	Federal Subsistence	No open season	-	Berners Bay drainages
2019	Federal Subsistence	Sept 15-Oct 15	One	Berners Bay drainages, 1 bull by Federal drawing permit, up to 2 permits issued

Federal regulatory history

Prior to 2010, no customary and traditional use determination had been made for moose in the Berners Bay drainages. The Board adopted Proposal WP10-11 submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), which requested recognition of customary and traditional uses of moose in Unit 1C, including Berners Bay, by residents of Units 1-5.

Prior to 2019, there was never a Federal season for moose in Berners Bay as the State season was not adopted into Federal regulation at the beginning of the Federal Subsistence Management Program.

Proposal WP02-14 requested establishment of a Federal season in Berners Bay, but was deferred because no customary and traditional use determination had been made. Proposal WP08-06b requested establishment of a Federal season, but the proposal was deferred because of conservation concerns with the population at the time. The deferred proposal (Proposal WP10-18b) was rejected during the 2010 cycle also due to conservation concerns.

These previous proposals requested a Federal season through a registration hunt. A Berners Bay moose hunt was requested by a resident of Gustavus during the 2018 wildlife proposal cycle. Wildlife Proposal WP18-11 requested that the Board provide a Federal priority for moose in Unit 1C Berners Bay for Federally qualified subsistence users, or that Federal lands be closed to the harvest of moose by all users, or that it be clearly stated on record why a Federal subsistence priority for moose should not be provided to rural residents. The Council recommended opposing the proposal during its fall 2018 regulatory meeting, but requested additional options from staff. During the Councils' winter 2019 meeting (which occurred prior to the Board meeting) the Council considered additional information provided by staff. At the Board meeting, the Council Chair submitted the original recommendation to oppose the proposal, but asked the Board to consider a compromise, developed by the Council, where 25% of available permits would be issued to Federally qualified subsistence users and to delay implementation until Fall 2019. The Board adopted the alternative suggested by the Council (FSB 2018). ADF&G opposed the recommendation of the Council.

Following the Board's decision, Territorial Sportsmen Inc. submitted a request for reconsideration to the Board to revisit their decision on WP18-11, citing no conservation concern or customary and traditional use of Berners Bay moose. During its April, 2019 meeting, the Board denied this request because it did not meet the threshold requirements for further consideration as outlined in 36 CFR 242.20(d) and 50 CFR 100.20(d) (FSB 2019). The Federal subsistence drawing for the 2019 season occurred on July 15 and two permits were issued to randomly selected applicants.

### **Biological Background**

Berners Bay moose are an introduced population in a small, geographically isolated location where no moose existed before. Fifteen moose calves from the Matanuska and Susitna Valleys were released in Berners Bay in 1958, and a supplemental release of six more calves occurred in 1960. This introduction was a cooperative effort by ADF&G, U.S. Fish and Wildlife Service (USFWS), and Territorial Sportsmen Inc., while the U.S. Air Force and Air National Guard provided transportation (Paul 2009).

## Habitat

The majority of the Berners Bay drainages (including the most important moose habitats) are managed by the USFS in an undeveloped condition. Radio-collared moose in the Berners Bay area primarily use lowland areas close to the major rivers and do not utilize alpine areas (White and Barten 2009, White et. al. 2012). The geography of the area allows for minimal migration and has limited habitat. Because of this, ADF&G has used a variety of harvest management strategies, changing the harvest from bulls only to bulls and cows, in an attempt to balance the sex ratio and to keep the population size within the carrying capacity of the habitat. The use of a habitat capability model and moose browse surveys in the early 1980s helped develop the present management strategy of maintaining a post hunting survey count of 80-90 moose and a bull:cow ratio of 25:100 (Barton 2008, Sell 2014).

## Population Information

In 2006, the Berners Bay moose population appeared to be near the estimated carrying capacity of between 100 and 150 animals (Barten 2008). Subsequent surveys by White and Barten (2009) (**Table 2**) indicated that the population had declined approximately 30% since 2006, which they attributed to harsh winter conditions resulting in poor spring body condition and moderate-low adult survival and pregnancy rates. Low calf survival rates (including summer predation mortality) were another factor in the population decline (White and Barten 2009). Moose in Berners Bay are subject to predation by wolves, brown bears, and black bears, but the amount has not been quantified. ADF&G did not issue any harvest permits for this hunt from 2007-2013 due to conservation concerns about the population. Population estimates are not available for surveys prior to 2006 because there were no collared moose to develop sightability correction factors, which are used to estimate the total population when not all animals can confidently be counted. Prior to 2006, ADF&G assumed that 80-90 moose observed equated to a population within the estimated carrying capacity (Barten 2008). Survey results from 1990-2019 are included in **Table 3**. ADF&G uses the aerial survey results to determine the number of bull and cow moose draw permits to issue. The low numbers of moose observed in 2007-2011 led to the season closures of 2007-2013. Surveys since 2013 indicate the population had recovered to harvestable levels.

**Table 2.** Population estimates for Berners Bay moose 2006-2019 (White and Barten 2009, Sell 2017, pers. comm.; Churchwell 2019, pers. comm.).

Survey Year	Survey Date	Total Moose Seen	Total Collared Moose	Marked Moose Seen	Proportion Moose Observed	Population Estimate
2006	11/25/2006	85	31	22	0.71	119 ± 22
2006	1/11/2007	76	31	20	0.65	116 ± 25
2006	1/26/2007	69	31	16	0.52	131 ± 36
2006	2/13/2007	78	30	19	0.63	121 ± 27
2007	12/19/2007	59	30	17	0.57	102 ± 25
2007	1/7/2008	62	30	18	0.6	102 ± 23
2007	2/18/2008	41	28	13	0.46	86 ± 26
2007	2/23/2008	34	28	11	0.39	84 ± 29
2008	12/16/2008	33	32	12	0.38	85 ± 28
2008	2/17/2009	55	32	21	0.66	83 ± 15
2009	12/15/2009	51	33	22	0.65	78 ± 18
2010	12/3/2010	73	34	28	0.82	88 ± 10
2011	11/19/2011	73	27	18	0.67	108 ± 23
2012	12/7/2012	102	30	27	0.9	113 ± 11
2013	12/3/2013	73	27	21	0.78	93 ± 15
2014	12/4/2014	105	30	29	0.967	109 ± 6
2015	No Survey					
2016	12/11/2016	115	21	17	0.81	141 ± 25
2017	No Survey					
2018	No Survey					
2019	02/8/2019	106	30	23	0.77	137 ± 23

**Table 3.** Survey data for the Berners Bay moose herd 1990-2019 (White and Barten 2009; Sell 2017, pers. comm.; Churchwell 2019, pers. comm.).

Survey Year	Survey Date	Bulls	Cows	Calves	Unknown	Total moose	Count time (hrs)	Bulls per 100 Cows	Calves per 100 Cows	Calves % in herd	Moose per hour
1990	11/25/1990	14	53	18	0	85	2.6	26	34	21	33
1991	1/27/1992	---	---	11	50	61	1.2	---	---	18	50
1992	1/5/1993	14	61	8	0	83	2.8	23	13	10	29
1993	1/21/1994	---	---	12	45	67	2.8	---	---	18	24
1994	11/16/1994	17	45	13	0	75	2	38	29	17	38
1995	No Survey										
1996	No Survey										
1997	1/7/1998	6	11	12	31	60	2.1	---	---	20	29
1998	12/19/1998	14	9	10	37	70	2.6	---	---	14	27
1999	11/29/1999	14	11	13	70	108	2.4	17	16	12	45
2000	2/15/2001	---	10	12	57	79	2.4	---	---	15	33
2001	2/2/2002	---	10	10	46	66	2	---	---	15	33
2002	2/28/2003	---	4	4	50	58	2.2	---	---	7	26
2002	3/16/2003	---	7	7	28	42	2.7	---	---	17	22
2003	11/19/2003	18	11	13	39	81	2.6	36	26	16	31
2004	11/3/2004	7	12	12	55	86	---	10	18	14	26
2005	12/6/2005	15	12	13	60	100	---	21	18	13	40
2006	11/11/2006	10	56	9	0	75	---	18	16	12	21
2006	11/25/2006	10	60	12	3	85	---	17	20	14	---
2006	1/11/2007	3	9	11	53	76	---	---	---	14	---
2006	1/26/2007	1	6	7	55	69	---	---	---	10	---
2006	2/13/2007	0	6	8	64	78	---	---	---	10	---
2007	12/19/2007	10	44	5	0	59	---	23	11	8	---
2007	1/7/2008	5	5	5	47	62	---	---	---	8	---
2007	2/18/2008	0	0	5	36	46	---	---	---	12	---
2007	2/23/2008	0	0	2	32	34	---	---	---	5	---
2008	12/16/2008	3	22	3	5	33	---	11	14	9	---
2008	2/17/2009	---	8	8	39	57	---	---	---	14	---
2009	12/15/2009	12	20	4	15	51	3	34	11	8	17
2010	12/3/2010	18	45	10	0	73	4.3	40	22	14	17
2011	11/19/2011	22	41	10	0	73	---	54	24	14	---
2012	11/27/2012	23	53	14	0	85	2.3	43	17	11	37
2012	12/7/2012	21	67	14	0	102	4	31	21	14	26
2013	12/3/2013	18	47	8	0	73	---	38	17	11	---
2014	12/4/2014	22	52	24	7	105	4.6	37	41	23	23
2015	No Survey										
2016	12/11/2016	18	31	27	39	115	3.83	26	39	23	30
2017	No Survey										
2018	No Survey										
2019	02/8/2019	2	26	13	65	106	4.83	8	50	12	22



## Cultural Knowledge and Traditional Practices

All rural residents of Southeast Alaska (Units 1-5) are eligible to harvest moose within the Berners Bay hunt area during the Federal hunt. The rural area of the Southeast Region is comprised of about 33 small to medium sized communities, ranging in population from 20 or less (Point Baker, Elfin Cove, and Game Creek) to over 8,000 (Sitka). Many were established by Tlingit and are situated at historical village sites or were established by Haida (Hydaburg) or Tsimshian (Metlakatla). Beginning in the 1970s, timber logging camps sprang up and some have persisted as new communities, such as Game Creek and Thorne Bay. Many rural communities in the Southeast Region have at their core a *kwaan* or tribe of Alaska Natives. Kwaan territories mapped in 1947 by Goldschmidt and Haas (1998) covered all of the Southeast Region. Since 1960, the rural population of the Southeast Region has doubled from 13,102 people in 1960 to 26,343 people in 2010 (**Table 4**).

**Table 4.** The number of people in Southeast Alaska communities in according to the 2010 U.S. Census (Source: ADCCED 2017).

Community	2010 Number of people	2010 Number of households
Angoon	459	167
Coffman Cove	176	89
Craig	1,201	523
Edna Bay	42	19
Elfin Cove	20	15
Game Creek	18	10
Gustavus	442	199
Haines Borough	2,508	991
Hollis CDP	112	55
Hoonah	760	300
Hydaburg	376	133
Hyder	87	47
Kake	557	246
Kasaan	49	17
Klawock	755	313
Klukwan	95	44
Kupreanof	27	15
Metlakatla	1,405	469
Naukati Bay	113	60
Pelican	88	70
Petersburg Borough	2,948	1,252
Point Baker	15	8
Port Alexander	52	22
Port Protection	48	26
Saxman	411	120

Community	2010 Number of people	2010 Number of households
Sitka borough	8,881	3,545
Skagway	920	410
Tenakee Springs	131	72
Thorne Bay	471	214
Whale Pass	31	20
Whitstone	114	30
Wrangell Borough	2,369	1,053
Yakutat Borough	662	270
<b>Total</b>	<b>26,343</b>	<b>10,824</b>

Moose (*dzisk'w* in Tlingit) are recent arrivals in Southeast Alaska according to historical records (Brown 2004). Documented moose migrations into Southeast Alaska have been by way of river valley corridors from the Interior through the Coast Range. By the 1950s, moose were present on all major ranges in Southeast Alaska. Prior to the migration of moose into hunting areas, moose skins and sinew were valued and traded by the Tlingit (Goldschmidt and Hass 1998, Kamenskii 1985 [1906], Oberg 1973). For example, Stikine Tlingit traded with Tahltan hunters in the Interior. Taku Tlingit were harvesting moose prior to 1946 from upriver areas. As soon as moose became available in Southeast Alaska, local hunters, both Native and non-Native, began utilizing this resource. Emmons (1991) lists moose among Tlingit crests for the Raven moiety, and several Houses throughout Southeast Alaska are named after moose. In Unit 1C, the first documented migration of moose was in 1962. On the Gustavus forelands, the first sightings of moose occurred in 1968. Fifteen moose calves were introduced to Berners Bay in 1958, and a supplemental release of six more calves occurred in 1960. Moose is the primary terrestrial resource harvested by residents of Units 1C and 1D, unlike other areas of Southeast Alaska where deer predominate (ADF&G 2007).

The use of river drainages to harvest wild resources in Southeast Alaska is well documented (Davidson 1928, Goldschmidt and Haas 1998). Drainages were regularly used to hunt goat and bear, trap furbearers, and collect plants and berries. Cabins and smokehouses were often located on these routes where meat was preserved by smoking. After migrating into these areas, moose were also harvested. Berners Bay (*Daxanáak* in Tlingit) was visited by both Chilkat Tlingit, from Skagway and Haines areas, and Auk Tlingit, from Juneau and Admiralty Island areas, to harvest wild resources during the late nineteenth and early twentieth centuries. In the nineteenth century, there were two, year-round villages, and several seasonally occupied camps and smokehouses located along Berners Bay drainages. The two, year-round villages were located between Lace River and Berners River. In addition, smokehouses were built at the mouth of Antler River. The area was used to hunt, fish, and gather berries. Seaweed and mussels were gathered from Echo Cove near the entrance to the bay. Coho and chum salmon were harvested and preserved. Goats were harvested, and mink, lynx, and wolverine were trapped. Cabins and smokehouses were accessed by poling boats upriver (Davidson 1928; Goldschmidt and Haas 4 1998:28, 33, 113, 116, and 190–192).

Detailed Berners Bay harvest data is available up to 2007 after which the season was closed until 2013 (Table 5). From 1993–2007 cumulative, 32 rural communities in Southeast Alaska applied for draw permits to harvest moose in Berners Bay. Most of the applicants (15,840 of 17,939 applicants, about 88%) were residents of the nonrural Juneau area. For all communities, during this 15-year period (1993–2007), on average 1,196 people applied for 11 permits each year. The corresponding draw success rate was 1%. The number of applicants demonstrates that people were interested in using the area, but the actual level of interest in hunting moose in the Berners Bay drainage has not been documented.

**Table 5.** Applicants: Berners Bay drawing permit, 1993 to 2007 (Source: ADF&G 2007).

Unit	Community	Number of applicants	Unit	Community	Number of applicants
	Nonresident	91	4	<b>Pelican</b>	27
	Residency unknown	4	4	<b>Port Alexander</b>	4
1A	Ketchikan	113	4	<b>Sitka</b>	409
1A	<b>Metlakatla*</b>	9	4	<b>Tenakee Springs</b>	68
1A	<b>Meyers Chuck</b>	11	4	<b>Whitestone logging camp</b>	4
1A	<b>Neets Bay</b>	1	5	<b>Yakutat</b>	2
1A	<b>Yes Bay</b>	1	6C	Cordova	3
1C	Auke Bay	1,083	6D	Valdez	2
1C	Douglas	1,490	7	Seward	4
1C	<b>Gustavus</b>	19	8	Kodiak	43
1C	<b>Hobart Bay</b>	6	8	Port Lions	2
1C	Juneau	13,267	11	Copper Center	1
1C	<b>Swanson Harbor</b>	10	12	Tok	3
1C	<b>Thorne Bay</b>	5	13A	Glennallen	2
1D	<b>Haines</b>	543	14A	Wasilla Palmer Area	23
1D	<b>Klukwan</b>	1	14C	Eagle River	5
1D	<b>Skagway</b>	35	14C	Anchorage	160
2	<b>Craig</b>	38	15A	Kenai	11
2	<b>Kasaan</b>	6	15A	Sterling	1
2	<b>Klawock</b>	1	15B	Soldotna	7
2	<b>Point Baker</b>	1	15C	Homer	3
2	<b>Port Protection</b>	6	19C	Kasilof	2
2	<b>Port St Nicholas</b>	1	20B	Eielson AFB	3
3	<b>Kake</b>	2	20B	Fairbanks	48
3	<b>Petersburg</b>	155	20B	North Pole	3
3	<b>Wrangell</b>	17	20B	Two Rivers	3
4	<b>Angoon</b>	13	20D	Delta Junction	6
4	<b>Cube Cove</b>	7	20E	Chicken	2
4	<b>Elfin Cove</b>	37	22D	Savoonga	2
4	<b>Funter Bay</b>	4	22C	Nome	2
4	<b>Gull Cove</b>	2	28	Barrow	15
4	<b>Hoonah</b>	90			
	(continue next column)			TOTAL	17,939

\* **Bolded** communities are rural communities in Southeast Alaska.

**Harvest History**

The first limited moose hunting season in Berners Bay was held in 1963, when four bulls were harvested. Since that time, the annual harvest has ranged from 0 to 23 animals (Sell 2014). **Table 6** shows the number of draw permits issued and moose harvested from 1983 through 2018. The number of permits issued remained steady at 8-9 permits between 2003 and 2006. However, this was down from the previous ten years when between 15 and 20 permits were issued each year. Hunters that receive permits have a high success rate, ranging from 60% to 100% in any given year. The success rate is high because the narrow valley bottoms contain good moose habitat, which concentrates moose along river corridors that provide hunter access. However, accessing many of the drainages in Berners Bay is difficult because of tidal influence and river gradient. Jet boats and air boats are the preferred means of access. The season was closed between 2007 and 2013 due to conservation concerns resulting from mortality during harsh winters. Four bulls were harvested in 2014, 2015 and 2016. Seven bulls were harvested in 2017 and six bulls were harvested in 2018. A total of seven permits were issued in 2019, two of which were allocated to the Federal draw hunt.

**Table 6.** Number of permits issued and moose harvested in Unit 1C, Berners Bay 1983 through 2018 (ADF&G 2019a, 2019b; Sell 2017 pers. comm.; Churchwell 2019, pers. comm.).

Year	Permits			Harvest			
	Bulls	Cows	Total	Bulls	Cows	Unknown	Total
1983	---	---	---	---	8	1	9
1984	---	---	---	1	13	0	14
1985	---	---	---	8	5	0	13
1986	---	---	---	5	0	0	5
1987	---	---	---	5	0	0	5
1988	---	---	---	4	0	0	4
1989	---	---	---	5	0	0	5
1990	---	---	5	5	0	0	5
1991	---	---	10	5	5	0	10
1992	---	---	10	5	4	0	9
1993	8	7	15	7	7	0	14
1994	8	7	15	8	6	0	14
1995	8	7	15	11	2	0	13
1996	9	8	17	7	7	0	14
1997	8	7	15	8	7	0	15
1998	8	7	15	8	7	0	15
1999	10	8	18	10	5	0	15
2000	10	10	20	8	7	0	15
2001	10	10	20	7	6	0	13
2002	8	7	15	5	4	0	9
2003	9	0	9	8	0	0	8

Year	Permits			Harvest			
	Bulls	Cows	Total	Bulls	Cows	Unknown	Total
2004	8	0	8	6	0	0	6
2005	8	0	8	5	0	0	5
2006	6	2	8	5	2	0	7
2007	0	0	0	0	0	0	0
2008	0	0	0	0	0	0	0
2009	0	0	0	0	0	0	0
2010	0	0	0	0	0	0	0
2011	0	0	0	0	0	0	0
2012	0	0	0	0	0	0	0
2013	0	0	0	0	0	0	0
2014	5	0	5	4	0	0	4
2015	5	0	5	4	0	0	4
2016	5	0	5	4	0	0	4
2017	7	0	7	7	0	0	7
2018	7	0	7	6	0	0	6

**Table 7** shows the Berners Bay moose harvest by community of residence for 1990 through 2018. **Tables 8 and 9** show the community of residence of applicants for the Berners Bay bull (hunt DM041) and antlerless (hunt DM042) harvest permits from 1993 through 2018. It is likely that many of the applicants for the bull hunt also apply for the antlerless hunt. By far, the majority of applicants come from the Juneau area. Haines shows a consistent number of applicants that exceeds the number of permits issued on an annual basis. Gustavus and Skagway show fairly consistent, low numbers of applicants. The demand for Berners Bay moose from rural communities is greater than the number of permits available annually.

**Table 7.** Residency of successful hunters in the Berners Bay portion of Unit 1C (State hunts DM041and DM042), from 1990 through 2018 (ADF&G 2019c; Churchwell 2019, pers. comm.).

Year	Residency												Total
	Anchorage	Angoon	Auke Bay	Douglas	Fairbanks	Haines	Juneau	Nome	Petersburg	Sitka	Thorne Bay	Non-resident	
1990							5						5
1991						1	9						10
1992							9						9
1993						1	13						14
1994						1	13						14
1995	1						11	1					13
1996							14						14
1997							13			1		1	15
1998			2	1		1	9		1	1			15
1999			2	2		1	10						15
2000			2	1	1		10		1				15
2001	1		3	1			7		1				13
2002				2		1	6						9
2003		1	1	1			5						8
2004				1			5						6
2005							5						5
2006			1				6						7
2007													0
2008-2013	Hunt Closed												
2014			1				3						4
2015				2			2						4
2016							4						4
2017			1	2			2				1	1	7
2018	1			2			3					1	7
<b>Total</b>	<b>2</b>	<b>1</b>	<b>12</b>	<b>11</b>	<b>1</b>	<b>6</b>	<b>159</b>	<b>1</b>	<b>3</b>	<b>2</b>		<b>1</b>	<b>199</b>

**Table 8.** Residency of applicants for the Unit 1C, Berners Bay, bull moose hunt (State hunt DM041) for the 1993/94 through 2016/17 regulatory years (Sell 2017, pers. comm.). The percent of Federally qualified applicants is probably slightly higher because the “Other” column is comprised of an unknown number of Federally qualified applicants.

Year	Community							Percent Federally qualified applicants*
	Excursion Inlet	Gustavus	Haines	Klukwan	Skagway	Other	Unknown	
1993			6			595	55	1%
1994		1	14			648	88	2%
1995			28			748	68	4%
1996			22		2	746	56	3%
1997			19		5	586	30	4%
1998			31		1	596	60	5%
1999		1	38		4	864		5%
2000		1	31		2	882		4%
2001		1	32			800		4%
2002		1	28		2	795		4%
2003		5	19		3	746		3%
2004		2	16			720		2%
2005			12			597		2%
2006			15		2	507		3%
2007			7			458		2%
2008-2013	Hunt closed							
2014			13		3	492	4	3%
2015		1	3			584		1%
2016			4		2	711		1%

\* The percent Federally qualified applicants is probably slightly higher because the “other” column is comprised of an unknown number of Federally qualified applicants.

**Table 9.** Residency of applicants for the Unit 1C, Berners Bay, antlerless moose hunt (State hunt DM042) for the 1993/94 through 2016/17 regulatory years (Sell 2017, pers. comm). The percent Federally qualified applicants is probably slightly higher because the “other” column is comprised of an unknown number of Federally qualified applicants.

Year	Community							Percent Federally qualified applicants*
	Excursion Inlet	Gustavus	Haines	Klukwan	Skagway	Other	Unknown	
1993			5			559	55	1%
1994		1	13			608	90	2%
1995			26			712	66	4%
1996			19		1	669	53	3%
1997			20		6	535	25	5%
1998			20		1	539	55	4%
1999		1	23	1		762		3%
2000		1	27		3	827		4%
2001		1	33			745		4%
2002		2	28		2	750		4%
2003						6		0%
2004-2005	No antlerless quota							
2006		1	11		1	342		4%
2007-2018	No antlerless quota							

\* The percent Federally qualified applicants is probably slightly higher because the “other” column is comprised of an unknown number of Federally qualified applicants.

**Effects of the Proposal**

Non-Federally qualified users have been the primary harvesters of Berners Bay moose since the inception of a State season in the area because they are the overwhelming majority of applicants for the State draw hunt. If the Federal season for moose in Berners Bay drainages in Unit 1C is rescinded, Federally qualified subsistence users would once again have to compete with many non-Federally qualified users for few permits, resulting in little chance of drawing a permit. Rescinding the Federal season would also remove the subsistence priority for Federally qualified subsistence users to harvest moose there. Consequently, Federally qualified subsistence users would lose harvest opportunity while non-Federally qualified users would gain opportunity because more permits would be available to them. The Berners Bay moose population would not be affected by this proposal because the number of permits available would not be affected.

**OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP20-01.



## 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” or “to continue subsistence uses of such populations.”

Rescinding the Federal season for moose in Berners Bay drainages in Unit 1C would remove the subsistence priority for Federally qualified subsistence users to harvest moose there. The priority harvest of moose by Federally qualified subsistence users is consistent with ANILCA Title VIII and the Board’s Closure Policy. For over 30 years prior to 2019, Federally qualified subsistence users residing in Units 1-5 have not been provided a meaningful priority to hunt moose in Berners Bay. The demand for Berners Bay moose from all eligible hunters under State and Federal regulations is greater than the harvestable surplus as shown by the harvest history, population data, and applicant data. The Berners Bay moose population would not be affected by this proposal because the number of permits available would not be affected.

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WRITTEN PUBLIC COMMENTS



THE STATE  
of ALASKA  
GOVERNOR MICHAEL J. DUNLEAVY

Alaska Board of Game

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June 24, 2019

Mr. Anthony Christianson, Chairman  
Federal Subsistence Board  
USF&WS Office of Subsistence Management  
1011 East Tudor Road M/S 121  
Anchorage, AK 99503-6199

Subject: WP20-01 regarding Berners Bay federal moose hunting regulations

Dear Chairman Christiansen and Members of the Federal Subsistence Board,

As chairman of the Board of Game (board), I want to express the board's concerns with the federal moose hunting regulation for the Berners Bay Drainages in Unit 1C which was created in April 2018. During our February 2018 board meeting in Dillingham, the board agreed to send a letter urging the Federal Subsistence Board to reject the proposal to create the hunt (WP18-110) for the following reasons:

- Moose were transplanted to Berners Bay primarily for the benefit of Juneau hunters and with substantial support from Territorial Sportsmen Inc., a Juneau-based hunting and sport fishing organization.
- Historically, Juneau hunters have accounted for the overwhelming majority of hunter effort and harvest in Berners Bay including the moose hunt.
- Hunters from federally qualified communities in northern Southeast have virtually no record of hunting or harvesting game in Berners Bay.
- Adopting the proposals establishing federal priorities would disenfranchise Juneau hunters.
- The Department of Fish and Game currently devotes considerable effort to monitoring the Berners Bay moose population and determining sustainable harvest levels. That work is accomplished using funds from state license sales and Federal Aid in Wildlife Restoration grants. All Alaska hunters contribute to those funding sources and have a right to benefit from their expenditure.

I submit this comment to ask the FSB members to consider these concerns by the Board of Game when you address Wildlife Proposal #20-01 by the Department of Fish and Game seeking repeal the federal moose hunt in Berners Bay.

Chairman Anthony Christianson  
Federal Subsistence Board

pg. 2/2

June 24, 2019

Thank you for your consideration of this important matter.

Sincerely,

Handwritten signature of Ted Spraker in black ink.

Ted Spraker, Chairman  
Alaska Board of Game

cc: Deanna Perry, Subsistence Advisory Council Coordinator, Forest Service  
Kevin Maier, Chairman, Juneau-Douglas Fish and Game Advisory Committee  
Eddie Grasser, Director, ADF&G, Division of Wildlife Conservation  
Ryan Scott, Assistant Director, ADF&G, Division of Wildlife Conservation

**Ketchikan Advisory Committee**  
**June 6<sup>th</sup>, 2019**  
**ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

<b>WP20–02 Executive Summary</b>	
<b>General Description</b>	Proposal WP20–02 requests that requests that the reduced deer harvest limit for non-Federally qualified users in Unit 2 be rescinded. <i>Submitted by: Alaska Department of Fish and Game.</i>
<b>Proposed Regulation</b>	<p><b>Unit 2—Deer</b></p> <p><i>5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct.15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, buy may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.</i></p> <p><i>July 24 – Jan 31</i></p> <p><i>The Federal public lands on Prince of Wales Island, excluding the southeaster portion (lands south of the West Arm of Chomondeley Sound draining into Chomondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1- Aug. 15, except by Federally qualified subsistence users hunting under these regulations. <del>Non-Federally-qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.</del></i></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Support</b>



**DRAFT STAFF ANALYSIS**  
**WP20-02**

**ISSUES**

Wildlife Proposal WP20-02, submitted by the Alaska Department of Fish and Game (ADF&G), requests that the reduced deer harvest limit for non-Federally qualified users in Unit 2 be rescinded.

**DISCUSSION**

The Federal Subsistence Board (Board) reduced the deer harvest limit in Unit 2 for non-Federally qualified users from four to two male deer at the April 2018 meeting (WP18-01). The proponent strongly disagrees with this action and encourages the Board to return the non-Federally qualified user deer harvest limit back to four male deer.

The proponent contends that the Board does not have the authority to unnecessarily restrict non-Federally qualified users, and that Alaska National Interest Lands Claim Act (ANILCA) Section 1314 affirms the States sovereign responsibility and authority for management of fish and wildlife on all lands “except as may be provided in Title VIII.” The proponent states that numerous sections in Title VIII specifically recognize the State’s role in providing a priority for customary and traditional subsistence uses of fish and wildlife on Federal public lands, and that consultation is necessary to evaluate whether proposed Federal regulatory actions are “consistent with management of fish and wildlife in accordance with recognized scientific principles” and “assure the continued viability of a fish or wildlife population,” which Congress recognized is the purview of the State.

The proponent contends that the extent and consistency of directions in ANILCA Title VIII confirm that Congress intended for the State to continue to manage fish and wildlife in accordance with established scientific principles, to continue to regulate harvests and other uses, and to be involved in implementation of the Federal subsistence priority. The State of Alaska, and not the Board, is authorized to establish methods and means and to establish seasons for non-Federally qualified users.

Furthermore, the proponent contends that the Board’s harvest limit restriction is unnecessary and unjustified in these circumstances and that this is the first known occurrence of the Board reducing State harvest limits. The proponent states that there is no conservation concern for the deer population, and that the deer population continues to be viable, as indicated by the generous harvest limits and season for Federally qualified subsistence users. The proponent states that no restrictions are needed to continue subsistence uses of deer, and that there is no credible argument that restricting non-Federally qualified users to two bucks instead of four is necessary to continue subsistence uses. They state that the effect is likely to be very marginal and any benefit will not be quantifiable.

The proponent also states that ADF&G conducted a review of the biological and management metrics, and that there is nothing to suggest there is a significant decline in deer numbers in Unit 2.

## Existing Federal Regulation

### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, buy may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.* July 24-Jan 31

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Chomondeley Sound draining into Chomondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1- Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## Proposed Federal Regulation

### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, buy may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.* July 24-Jan 31

*The Federal public lands on Prince of Wales Island, excluding the southeaster portion (lands south of the West Arm of Chomondeley Sound draining into Chomondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1- Aug. 15, except by Federally qualified subsistence users hunting under these regulations. ~~Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.~~*

## Existing State Regulation

### Unit 2 – Deer

*Residents and non-residents: Four bucks*

*Aug. 1 – Dec. 31*

*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.*

## Extent of Federal Public Lands

Unit 2 is comprised of 74% Federal public lands and consist of 73% U.S. Forest Service (USFS) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit Map**).

## Customary and Traditional Use Determinations

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

## Regulatory History

Hunting regulations have permitted the harvest of deer in Unit 2 since 1925 (**Appendix 1**). During this period, season closing dates have varied between November and December, with December 31 being the most common closing date since 1988. Seasons and harvest limits for Federally qualified subsistence users in Unit 2 are more liberal than State regulations. Federal regulations have allowed the harvest of one female deer in Unit 2 since 1995, as well as the harvest of five deer beginning in 2006.

Following years of numerous Unit 2 related deer proposals (**Appendix 2**) submitted to the Federal Subsistence Board (Board), the Unit 2 Deer Planning Subcommittee (Subcommittee) was formed in 2004 to address contentious deer management issues in Unit 2. At the request of the Board, the Council established the 12-member Subcommittee to address concerns that Federally qualified subsistence users in Unit 2 were unable to harvest enough deer to meet their needs. The Subcommittee included residents of Craig, Hydaburg, Ketchikan, Petersburg, Point Baker, and Wrangell, to reflect the range of users of Unit 2 deer, along with representatives from State and Federal wildlife management agencies.

The Subcommittee developed management recommendations at a series of five public meetings held in communities that depend upon Unit 2 deer. Both Federally and non-Federally qualified users participated at these meetings. The Subcommittee recommended that deer harvest management tools could be applied in Unit 2 as deer population trends and hunting use patterns changed. The degree to which these tools would be employed would be decided through the established public regulatory processes (SEASRAC 2006).

In 2006, the Board implemented two major changes to the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09, both with modification. Adoption of WP06-08 as modified, reopened a portion of Federal public lands to non-Federally qualified users on the southeast side of Prince of Wales

Island. Adoption of WP06-09 as modified, established the current five deer harvest limit for Federally qualified subsistence users (FSB 2006). Two other proposals, WP06-06 and WP06-10, related to the use of harvest tickets in Unit 2 and were unanimously opposed by the Council and rejected by the Board (FSB 2006).

Three proposals related to Unit 2 deer were submitted from 2007-2012. Proposal WP07-07 requested the female deer season be closed, Proposal WP10-19 requested a change to the female deer season, and Proposal WP10-20 requested the August closure to non-Federally qualified users be lifted. The Council opposed and the Board rejected these proposals (FSB 2007, 2010).

Also during 2010, the Board adopted WP10-22 with modification delegating management authority for wildlife by letter to the ten District Rangers located in Units 1-5. As a result, the delegated authority in Unit 2 changed from the Tongass Forest Supervisor to the District Rangers of both the Craig and Thorne Bay Ranger Districts. For deer, their scope of delegation allows them to set harvest quotas; to close, reopen or adjust Federal subsistence deer seasons; and to adjust harvest and possession limits for that species. Most likely, this type of action would occur prior to the season. Any action greater than 60 days in length requires a public hearing before implementation. They may also close Federal Public lands to the take of this species to all users. This type of action would most likely take place during the season. Action on the proposal also removed the requirement for consultation with the both Council Chair and ADF&G, as this was already defined protocol within the Special Action process (FSB 2010).

Two proposals were considered for deer in Unit 2 in 2013. Proposal WP14-03 requested the female deer season be eliminated whereas Proposal WP14-04 asked for an earlier season to be established for Federally qualified subsistence users over the age of 60 or physically disabled. The Council unanimously opposed and the Board rejected these proposals (SEASRAC 2013; FSB 2014).

Three proposals were considered for deer in Unit 2 in 2015. Proposal WP16-01 requested a harvest limit reduction for non-Federally qualified users as well as an extension of the Federal season through the month of January. This proposal was broken into two sub-proposals by the Council who opposed the harvest limit reduction but supported the season extension with the following justifications: 1) the Unit 2 deer population was stable; 2) January harvest was a traditional practice according to testimony; 3) any additional female deer harvest was believed to be minimal and sustainable; and 4) the USFS District Ranger in Unit 2 has delegated authority to close the season early if conservation needs arise. The Board adopted the proposal as modified by the Council. Proposal WP16-05 requested removal of language regarding a harvest limit reduction during times of conservation because that authority is included by delegation to the Federal in-season manager and WP16-08 requested harvest ticket #5 be used out of sequence when harvesting a female deer. Both proposals were unanimously supported by the Council and adopted by the Board (SEASRAC 2015; FSB 2016).

Proposal WP18-01 was considered during the 2018 regulatory cycle. The proposal requested a reduction of both the season length and the harvest limit for non-Federally qualified users. The Council divided the proposal into two action items where they supported the harvest limit reduction but opposed the shortening of the season. The Board adopted the harvest limit reduction as recommended by the Council

based on testimony from Federally qualified subsistence users that they were not meeting their needs. The Board rejected the season date reduction because they believed it would not provide additional benefits as harvests in December were minimal by both user groups and that subsistence users already had additional priorities available in the form of; the week in July, the closure to non-Federally qualified users in August, the ability to harvest a female deer starting October 15, a season extension into the month of January and the ability to harvest up to five deer total (SEASRAC 2017; FSB 2018a).

Due to administrative delays in the Federal Rule Making Process, on August 8, 2018, the Board approved temporary delegated authority to some Federal land managers to enact temporary changes to Federal Subsistence Regulations adopted by the Board during the April 2018 regulatory meeting (FSB 2018b). This delegation of authority was established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6). As a result, emergency special action 13-BD-06-18 was issued on August 16, 2018 by the USFS District Ranger restricting the harvest of deer by non-Federally qualified users to two male deer on Federal Public lands in Unit 2. The action was set to expire on October 15, 2018 or when the 2018-2020 Federal Subsistence Wildlife Regulations were published in the Federal Register.

Proposal WP18-02, requesting the Customary and Traditional use determination for deer in Units 1-5 be modified to include all rural residents of Units 1-5, was also considered during the 2018 regulatory cycle. This proposal had unanimous support from the Council and was adopted by the Board as a consensus agenda item (SEASRAC 2017; FSB 2018a).

### **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation on steep slopes where there is less snow accumulation, and old-growth forests provide increased intermixing of snow-intercept and foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet energetic needs of lactating does. Some deer migrate and follow the greening vegetation up to alpine for the summer, while others remain at lower elevations. The breeding season, or rut, generally occurs late October through late November (ADF&G 2009) generally peaking around mid-November. Wolves and black bears are the primary predators present in Unit 2, and may reduce deer populations or increase recovery times after severe winters.

Deer populations in Southeast Alaska fluctuate and are primarily influenced by winter snow depths (Olson 1979). Deer in Southeast Alaska typically have trouble meeting their energy needs in winter (Hanley and McKendrick 1985, Parker et al. 1999), and winters with long periods of deep snow that restrict the availability of forage can result in deer depleting their energy reserves to the point of starvation (Olson 1979).

Summer nutrition is important for building body reserves to sustain deer through the winter (Stewart et al. 2005). Few studies have been conducted on summer habitat conditions because winter habitat carrying capacity is generally considered to be the limiting factor for deer in Southeast Alaska. However, deer populations at or above habitat carrying capacity are affected by intra-specific competition for food and may enter winter in reduced body condition compared to deer populations below carrying capacity (Kie et al. 2003, Stewart et al. 2005). This can result in higher susceptibility to severe winters and lower

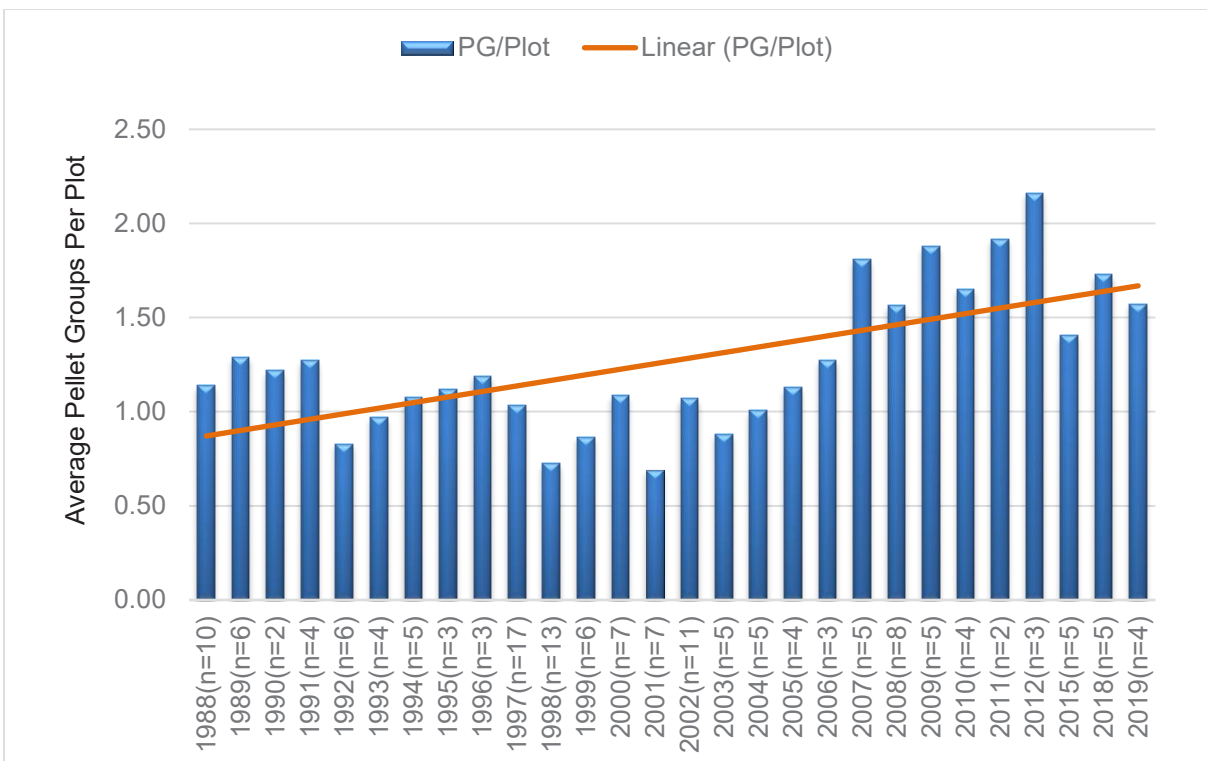
productivity (Kie et al. 2003, Stewart et al. 2005). In addition, nutritionally stressed does produce smaller and fewer fawns (Olson 1979).

### Recent population indices

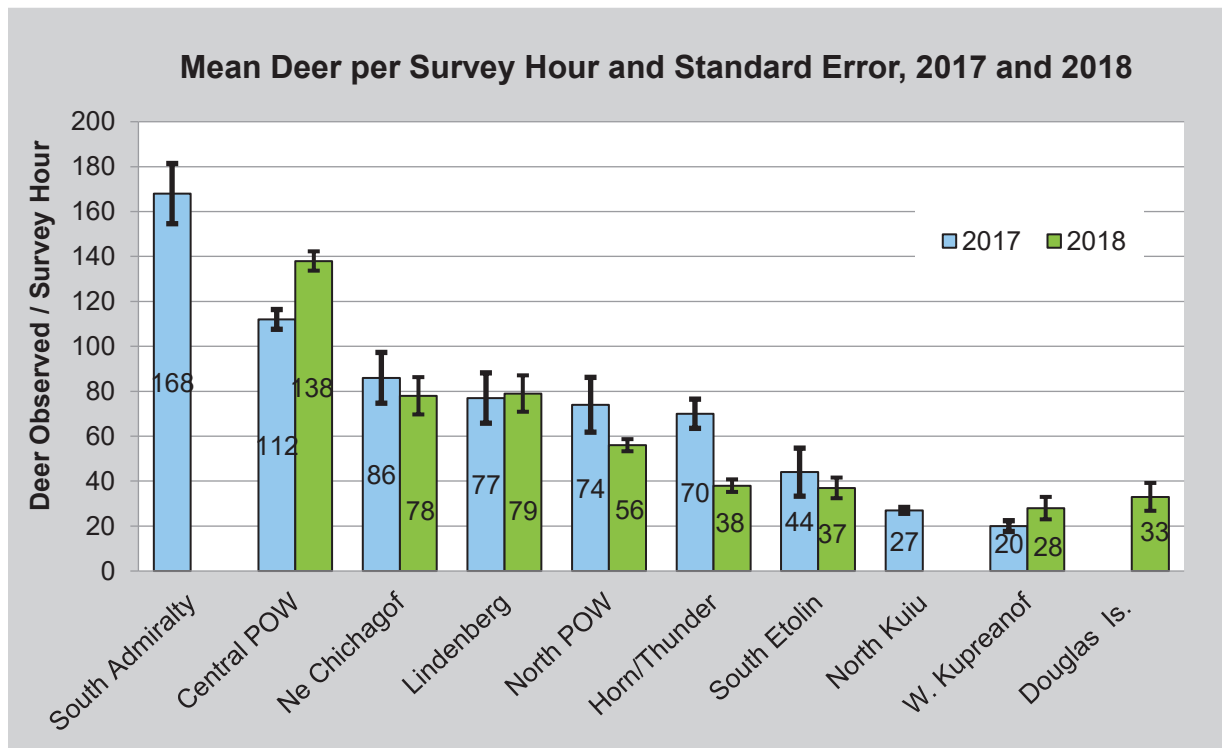
There are no methods to directly count deer in Southeast Alaska, so ADF&G conducts deer pellet surveys as an index to the relative abundance of the deer population. Relating pellet group data to population levels is difficult, however, because factors other than changes in deer population size can affect deer pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same zones each year. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer (McCoy 2011).

Brinkman et al. (2013) questioned the value of pellet-group surveys for monitoring population trends due to the variability in the data compared to DNA based pellet counts. Pellet group transects were designed to detect large (>30%) changes in abundance and are not an appropriate tool for monitoring smaller year to year changes. Although pellet-group surveys remain the only widely available deer population data, the results should be interpreted with caution. Pellet-group data in Unit 2 suggests a generally increasing population trend since a low during the late 1990s and early 2000s (**Figure 1**). This contrasts with Brinkman et al. (2011) who used a DNA based technique and estimated a 30% population decrease from 2006–2008 which they attributed to three consecutive winters with deep snow. Brinkman's study was limited to three watersheds, and the population changes during the study varied by watershed. It appears that populations subsequently increased after those severe winters and Bethune (2011) felt that by 2010 the Unit 2 deer population was healthy, stable to increasing, and at a 12-15 year high.

ADF&G began testing alpine deer aerial survey techniques in 2013 (**Figure 2**). 2017 was the first year with an established protocol and consistent surveys across southeast Alaska. ADF&G is still researching the correlation between alpine surveys and actual deer populations. Aerial survey numbers seem to reflect the relative abundances expected among various locations, but correlations with population trends are unknown at this time.



**Figure 1:** Annual average pellet group counts and general trend for deer in Unit 2 through 2019 (McCoy 2019a).



**Figure 2:** Aerial alpine surveys across southeast Alaska for 2017 and 2018 (McCoy 2019b).

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 and intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Deep snow deer winter range is defined as high value productive old growth (size class 5, 6, 7) on south facing slopes below 800 feet, and this is considered to be the limiting habitat for deer in Southeast Alaska. Some areas of Unit 2 have been impacted by large scale changes in habitat due to timber harvest, while the habitat is largely intact in other areas. Young-growth forest treatments (e.g., thinning, small gap creation, branch pruning) can benefit deer forage development in previously harvested stands. Regardless, areas with substantial timber harvest are expected to have lower long-term carrying capacity compared to pre-harvest conditions.

There is 62% of deer winter habitat remaining in GMU 2 (**Table 1**) with WAAs 1214, 1315, 1317, 1318, 1420, 1421, 1525, 1529, 1530, 1531 having below 50% habitat remaining. This is from past timber harvest and road building. In the case of a severe winter, these will be the areas hit hardest with deer mortality since there is little habitat left to sustain them. Habitat conditions would not improve as the areas harvested have reached stem exclusion which can last from 25 year post harvest to 150 years post-harvest. **Figure 3** can be used to see where the least amount of habitat remains and if you compare it to **Table 1** you can see where harvest is greatest compared to available habitat. Most wildlife analysis areas (WAA) with less than 50% deep snow deer winter habitat have the highest harvest rates.

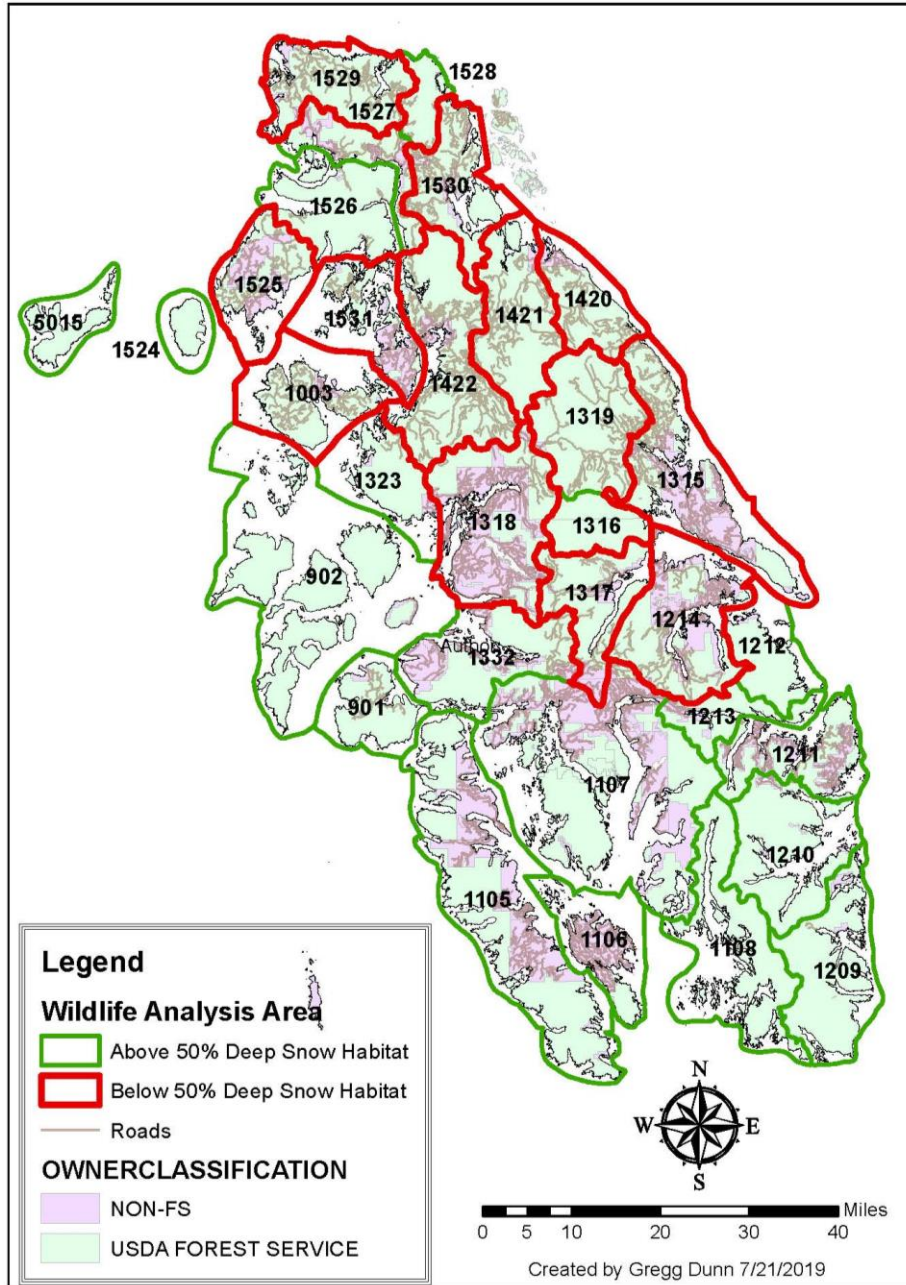
Conditions on the ground within the last few years have remained stable because of mild winters and later arrival of snow in Unit 2 allowing the deer to forage longer at altitude and in areas such as muskegs. Prolonged snowpack during a severe winter or within later stages of winter could have a greater effect on deer populations going forward since there is far less habitat available during those periods.

**Table 1:** Overall percent of historical habitat since 1954 (beginning of large scale logging) remaining by wildlife analysis area (WAA) in GMU 2 for deep snow deer winter habitat and all productive old growth, average harvest since 2005, and harvest trend.

WAA	Productive Old Growth	Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)	Average Reported Harvest by WAA since 2005 and trend
901	89	85	69 ↑
902	100	100	79 ↓
1003	51	49	46 ↑
1105	99	99	84 ↑
1106	100	100	25 ↓
1107	97	93	138 ↑
1108	99	99	17 ↑
1209	100	100	10 ↑
1210	99	99	50 ↑
1211	83	78	36 ↑



<b>WAA</b>	<b>Productive Old Growth</b>	<b>Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)</b>	<b>Average Reported Harvest by WAA since 2005 and trend</b>
1213	99	99	21 ↑
1214	67	48	245 ↑
1315	55	29	350 ↑
1316	99	100	27 ↓
1317	56	23	145 ↑
1318	78	49	220 ↑
1319	74	61	229 ↓
1323	90	76	18 ↓
1332	80	72	76 →
1420	54	27	308 ↑
1421	71	44	107 ↓
1422	51	29	386 ↓
1525	51	40	21 ↑
1526	93	83	18 ↑
1527	67	61	23 ↓
1528	82	84	37 →
1529	55	46	144 ↓
1530	50	37	145 ↑
1531	55	49	37 ↓



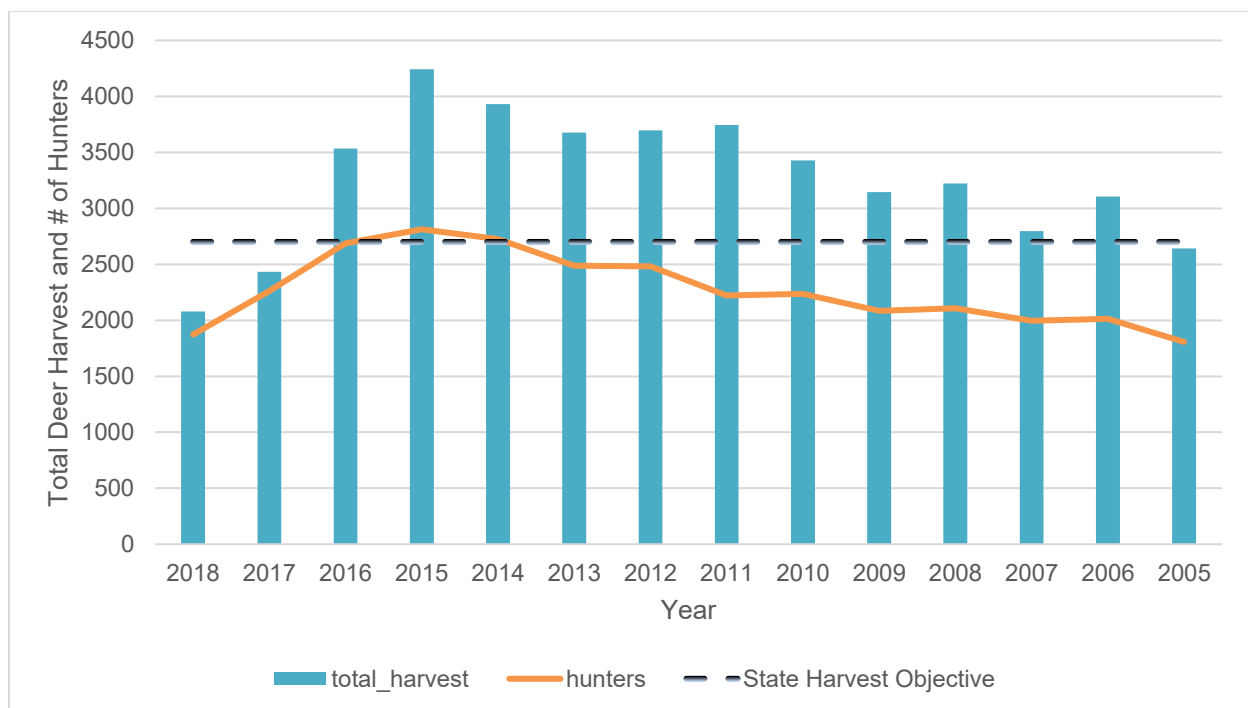
**Figure 3:** Map of Unit 2 showing deep snow deer winter habitat availability and where habitat is below 50% in WAAs. Note: WAA 5015 is not part of Unit 2.

### Harvest History

Harvest data reported below are provided by ADF&G (McCoy 2019b) and are gathered by several reporting systems including the Region 1 (Southeast Alaska) deer survey, Unit 2 deer harvest report, and the State-wide deer harvest report. The Region 1 deer survey is the most consistent report, covering the years 1997–2010 and is based on a sample of hunters. In general, 35% of hunters from each community were sampled annually and while response rates vary by community, the overall response rate across

communities was approximately 60% each year. Harvest numbers were extrapolated using expansion factors that are calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response was low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and interpreted with caution. Trends, however, should be fairly accurate, especially at larger scales. The Unit 2 deer report was in place from 2005–2010 and was instituted specifically for reporting deer harvest in Unit 2. In 2011, the statewide deer report replaced the other deer harvest reporting systems and requires reporting of harvest by all deer hunters. Different expansion factors are used for the various data sets so that total harvest estimates between years are comparable (McCoy 2013).

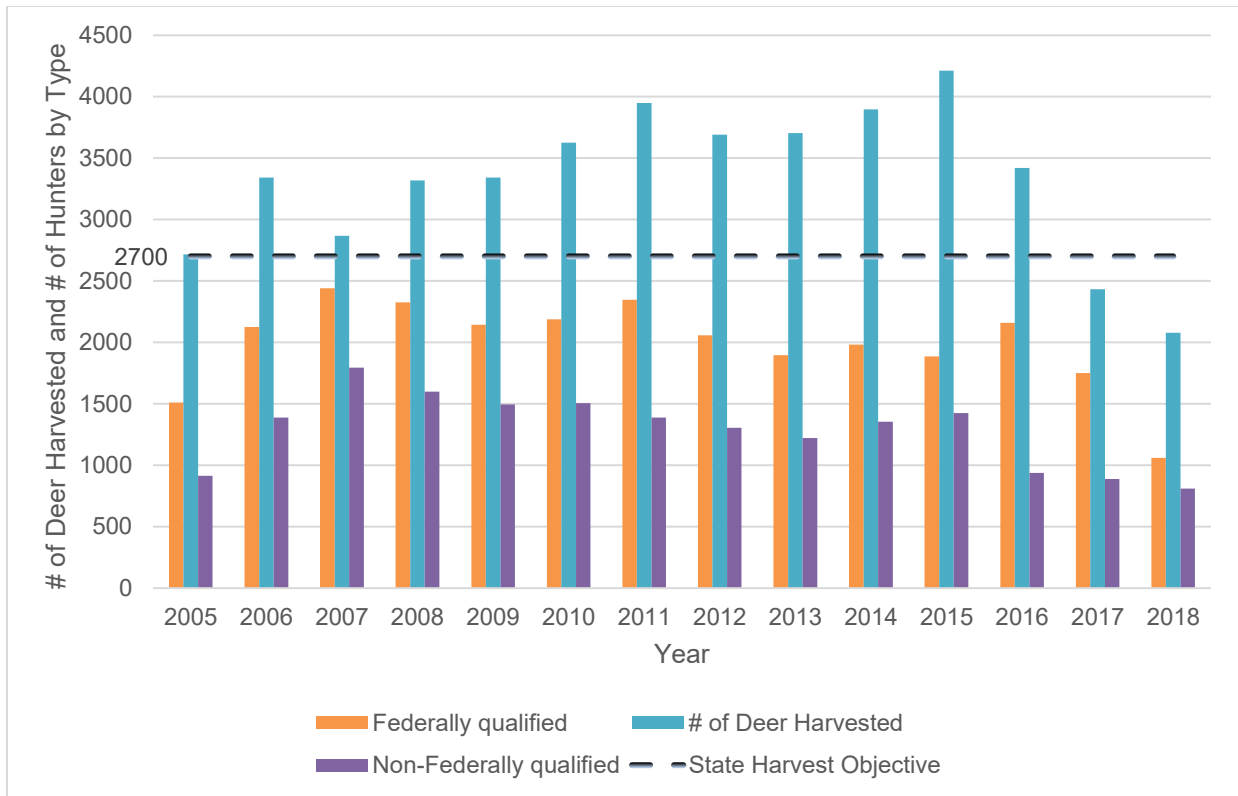
Action taken by the Alaska Board of Game in fall 2000 established a harvest objective of 2,700 deer for Unit 2 as they identified the population as important for satisfying high levels of human consumptive use (Bethune 2013). Estimated deer harvest in Unit 2 from 2005–2018 can be found in **Figure 4**. The estimated average total annual harvest is 3,467 deer. Harvests have been at or above ADF&G’s Unit 2 harvest objective from 2005-2016 and fell below harvest objectives during the 2017 and 2018 seasons. Deer harvest reached historically high levels in 2015 and then began to decline since. The same pattern can also be seen with hunter numbers participating in Unit 2 (**Figure 4**).



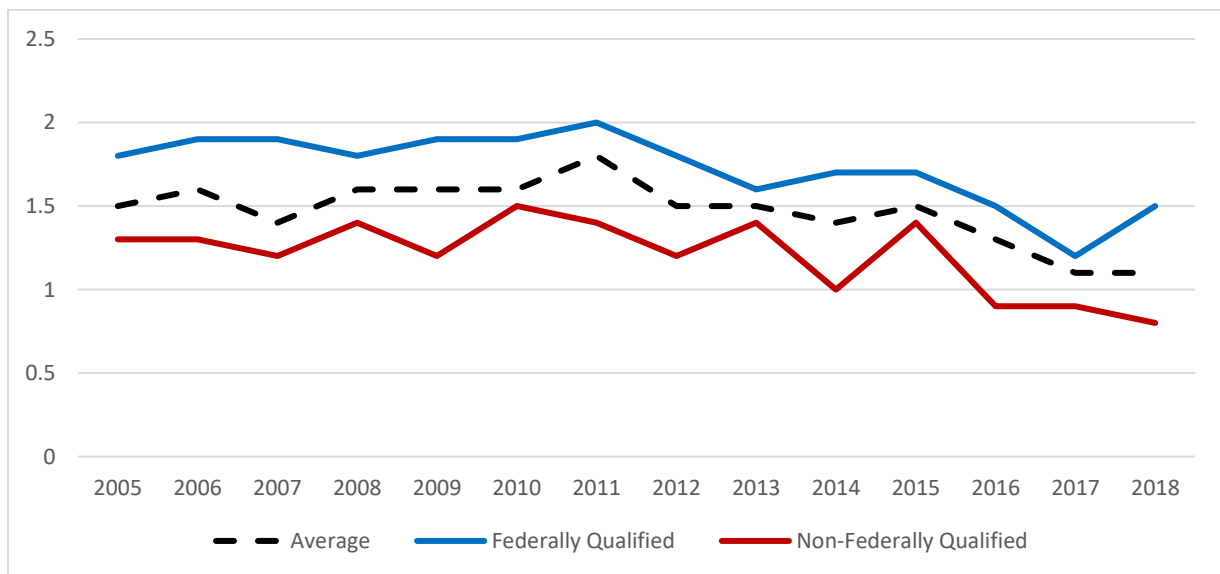
**Figure 4:** Total deer harvest and number of hunters during the 2005-2018 seasons in Unit 2 and showing the state harvest objective of 2,700 deer (McCoy 2019b).

Federally qualified subsistence users tend to harvest the most deer in Unit 2, which has ranged from 59%-71% of the total harvest from 2005-2018 (**Figure 5**). This estimate may be significantly higher, as past testimony has suggested that some communities do not fully report harvests taken during the

year (SERAC 2015; SERAC 2017). The average number of deer harvested per hunter has seemed to remain stable for Unit 2 residents since 2005 until 2015, and after that there is a noticeable decline (Figure 6). Since then, a slight increase has been noted for Federally-qualified subsistence users.



**Figure 5:** Estimated total deer harvest and number of hunters by user type from 2005-2018 in Unit 2 (McCoy 2019b)



**Figure 6:** Number of deer harvested per hunter by user type in Unit 2, 2005-2018 (McCoy 2019b)

Federally qualified subsistence users in Unit 2 had a higher success rate than other hunters from 1997-2017 with an average success rate of 74.4% during this period compared to 59.6% success rate for non-Federally qualified hunters (**Table 2**). Five deer have only been allowed since 2006.

**Table 2:** Overall percentage of hunters by number of deer reported harvested from 1997-2017 (McCoy 2019b). Note: Non-Federally qualified hunters are only allowed to harvest up to four deer.

Hunter Type	No Deer	1-2 Deer	3-4 Deer	5 Deer	Overall Success
<b>Federally Qualified</b>	25.6%	48.7%	23.8%	1.8%	74.4%
<b>Non-Federally Qualified</b>	40.4%	46.4%	13.1%	0	59.6%

Despite current abundant deer populations, historically high harvest, and liberalized seasons and harvest limits, there are continued concerns from members of the subsistence community regarding their inability to meet their subsistence needs. One concern is the perception of increased crowding from and competition with non-Federally qualified users, which may partly be a result of the Access Travel Management Plan (ATM) enacted by the USDA Forest Service in 2009. The ATM reduced access for hunters by reducing miles of roads accessible to hunters in Unit 2. The ATM may have concentrated hunters into smaller areas, affirming the perception of increasingly crowded hunting conditions. In addition, as clear-cuts advance past early seral stages, deer are less visible from the road which may also be leading to the misperception that fewer deer are available (Bethune 2013).

#### Other Mortality

It is believed that Unit 2 has one of the highest illegal and unreported harvest rates in the region, estimated to be equal to the legal harvest (Table 5 in Bethune 2015). That estimate is based on anecdotal reports, interviews with law enforcement personnel, and fates of radio-collared deer. If that estimate is correct, over 4% of the estimated 75,000 deer in Unit 2 may be illegally harvested each year. This high illegal take is likely due in large part to the extensive and remote road system and few law enforcement personnel patrolling the unit.

Flynn and Suring (1989) reported that actual mortality from legal hunting could be 38% greater than the estimated harvest because of unknown or unreported crippling loss. Field observations and voluntary reports of wounding loss suggest that this estimate might be conservative.

Historically and prior to extensive road paving on the island, deer/vehicle collisions were rare (10–25 deer/year) and were not considered a significant source of mortality. However, the collision risk increased with completion in 2003 of extensive new POW highway paving projects, which now extend from Craig to Coffman Cove and east to Thorne Bay. Construction and paving of the main 30 road to Coffman Cove was completed in 2008. Construction is currently underway to extend the paved surface of Road 20 to Whale Pass. Higher vehicle speeds, as well as an attractive food source created by planting grass for erosion control near the roads will likely cause more deer/vehicle collisions, prompting managers to raise estimates to 30-50 deer per year beginning in 2004.

## **Effects of the Proposal**

If adopted, the proposal would return the State deer harvest limit back to four, increasing opportunity on Federal public lands for non-Federally qualified users. This would likely increase both the number of non-Federally qualified user days hunted and encounters between Federally qualified subsistence users and non-Federally qualified users, thereby decreasing harvest opportunity for Federally qualified subsistence users through increased competition. The number of deer taken by non-Federally qualified users would likely increase, also decreasing harvest opportunity for Federally qualified subsistence users.

## **OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP20-02.

### **Justification**

The Board adopted the reduced deer harvest limit for non-Federally qualified users in response to extensive testimony that Federally qualified subsistence users needs were not being met. Current data indicate harvest is below the average of the previous ten years (2007-2016), peaking in 2015 and declining 2016-2018. Although results from recent deer pellet surveys in Unit 2 show a slight decrease in mean pellet-group counts, they are within the high end of the normal range, indicating populations are likely doing well. Other factors such as changing weather patterns, reductions in access, changes to deer behavior related to the presence of predators, and competition with non-Federally qualified users may limit harvest success. The current harvest limit for non-Federally qualified users only affects the few individuals that harvest more than two deer in Unit 2 annually, and it will likely contribute to greater hunting success for Federally qualified subsistence users through decreased competition.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

**APPENDICES**

**Appendix 1: Regulatory framework of State and Federal deer seasons by year since 1925**

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
1925	Open	Sept 15-Dec 16	3	Buck, 3" antlers or longer
1925-1929	Open	Sept 1-Nov 30	3	
1930-1941	Open	Aug 20-Nov 15	2	
1942-1943	Resident	Sept 16-Nov 15	2	
1942-1943	Non-resident	Sept 16-Nov 15	1	
1944-1948	Resident	Sept 1-Nov 7	2	
	Non-resident	Sept 1-Nov 7	1	
1949	Resident	Sept 1-Nov 15	2	
	Non-resident		1	
1950-1951	Resident	Aug 20-Nov 15	2	
1950-1951	Non-resident	Aug 20-Nov 15	1	
1952	Open	Aug 20-Nov 22	2	
1953-1954	Open	Aug 20-Nov 22	3	
1955	Open	Aug 20-Nov 22	3	
1956	Open	Aug 20-Nov 26	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 13-Nov 26
1957-1959	Open	Aug 20-Nov 30	4	4 deer, does may be taken Oct 15-Nov 30
1960	Open	Aug 20-Dec 15	4	4 deer, does may be taken Oct 15-Nov 30
1961	Open	Aug 20-Nov 30	4	4 deer, antlerless deer may be taken Sept 15-Nov 30
1962	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
<b>1963-1967</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1968</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1969-1971</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1972</b>	Open	Aug 1-Dec 31	3	3 deer, antlerless deer may be taken Nov 1-Nov 30
<b>1973-1977</b>	Open	Aug 1-Nov 30	3	1 antlerless deer may be taken Nov 1-Nov 30
<b>1978-1984</b>	Open	Aug 1-Nov 30	3	Antlered deer
<b>1985-1986</b>	State General	Aug 1-Nov 30	3	Antlered deer
<b>1987</b>	State General	Aug 1-Nov 30	4	1 antlerless deer may be taken Oct 10-Oct 31
<b>1988-2018</b>	State General	Aug 1-Dec 31	4	Antlered deer/bucks
<b>1991-1994</b>	Federal Subsistence	Aug 1-Dec 31	4	Antlered deer
<b>1995-1997</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken only during Oct 15-Dec 31
<b>1998-2002</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2003-2005</b>	Federal Subsistence	July 24-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2006-2009</b>	Federal Subsistence	July 24-Dec 31	5	No more than one may be an antlerless deer; antlerless deer may be taken Oct 15-Dec 31
<b>2010-2015</b>	Federal Subsistence	July 24-Dec 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Dec 31

Year	Type of Season	Season	Limit	Conditions & Limitations
2016-2018	Federal Subsistence	July 24-Jan 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Jan 31.

**Appendix 2:** History of Federal regulatory actions related to deer in Unit 2 taken by the Federal Subsistence Board

Proposal number	Reg Year	FSB action	Proposal request
P95-01	1995	Adopt w/ mod to require harvest report requirement	Create an antlerless season in Unit 2
R95-09	1995	Reject	Requested rescinding antlerless deer season created by adoption of P95-01
P97-07	1997	Reject	Reduce deer season from Aug. 1-Dec. 31 to Sept. 1-Dec. 31, and eliminate harvest of antlerless deer in Unit 2.
P98-09	1998	Reject	Eliminate antlerless season
P98-10	1998	Reject	Eliminate antlerless season and apply antler restriction of forked horn or larger
P98-11	1998	Reject	Shorten deer season from Sept 1 -Nov. 30
P98-12	1998	Reject	Eliminate antlerless season
P00-005	2000	Reject	Eliminate antlerless season
P00-05	2000	Reject	Eliminate antlerless deer season
P00-06	2000	Reject	Community harvest permit request of 500 deer per Unit 2 community
WP01-03	2001	Reject	Eliminate antlerless deer season
WP02-08	2002	Reject	Request increase of deer harvest limit for Unit 2 residents and reduction for Unit 1A and 3 residents
WP02-09	2002	Took no action	Restrict non-Federally qualified users from hunting on Federal lands between Aug. 1-31 and Oct. 16-Nov. 14
WRFR02-01	2002	Reject	Requested reconsideration of the Board rejecting WP02-09 to close Federal lands in Unit 2.
WP03-04	2003	Adopt with modification adding one week in July at front of season (July 24-31)	Requested earlier extension of deer season for Federally qualified users

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP03-05</b>	2003	Adopt with modification restricting non-Federally qualified users from Aug 1-21 on Federal Public Lands on Prince of Wales Island (closure for 1 year)	Requested closure of Federal public lands from Aug 1-Sept. 1 and reduction of harvest limit to 2 deer for non-Federally qualified subsistence users.
<b>WP04-03</b>	2004	Took no action	Requested closure be changed from Aug 1-21 to Oct. 16-Nov. 14 and reduction of harvest limit for non-Federally qualified users
<b>WP04-04</b>	2004	Took no action	Requested antlerless deer season be modified from Oct. 15-Dec. 31 to Aug. 1-Sept. 15
<b>WP04-05</b>	2004	Took no action	Requested closure to non-Federally qualified users be reduced by one week
<b>WP04-06</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-07</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-08</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-09</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with antler restrictions for non-Federally qualified users.
<b>WP04-10</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with a 3 buck harvest limit for non-Federally qualified users.
<b>WP04-11</b>	2004	Took no action	Requested removal of the July 24 start date for subsistence users and to modify closure from Aug. 1-21 to Oct. 16-Dec. 31 and implement a 2 buck harvest limit for non-Federally qualified users.
<b>WP04-12</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-Jan. 31 for subsistence users and modified the August closure to the month of January to all but Unit 2 residents

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP04-13</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-10 and removing the antlerless deer season for subsistence users and reducing the August closure from Aug. 1-10 for non-Federally qualified users.
<b>WP04-14</b>	2004	Took no action	Reduce deer season from July 24-Dec. 31 to Aug. 1-Dec. 31 for Federally qualified users in Unit 2.
<b>WP04-15</b>	2004	Adopt with modification restricting non-Federally qualified users from Aug 1-15 on Federal Public Lands on Prince of Wales Island	Requested continuation of the one year closure as passed by the FSB during the 2003 regulatory cycle.
<b>WP05-04</b>	2005	Adopt with modification removing registration requirement, but required use of a joint State/Federal harvest report as recommended by the Unit 2 Deer Subcommittee	Requested that all hunters obtain a Federal registration permit to hunt deer in Unit 2.
<b>WP06-06</b>	2006	Reject	Requested removing sequential use of harvest tickets and possession of all unused harvest ticket requirements.
<b>WP06-07</b>	2006	Took no action	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-08</b>	2006	Adopt with modification. Modifications included: 1) removal of the August closure on SE portion of Prince of Wales Island; 2) rejected closure to non-Federally qualified users on Suemez Island; and 3) rejected a closure to non-Federally qualified users on the islands located along the SW coast of Prince of Wales Island.	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-09</b>	2006	Adopt with modification. The Board modified the Council recommendation by eliminating the need to have a Federal permit for harvesting a 5th deer. The Board also delegated the Forest Supervisor the ability to lower the harvest limit to 4 deer if needed.	Requested increasing the deer harvest limit to 6 deer.
<b>WP06-10</b>	2006	Reject	Requested use of harvest ticket #1 to record harvest of a female deer.
<b>WP07-07</b>	2007	Reject	Requested either elimination of antlerless deer hunt or to only allow for antlerless deer harvest every other year.
<b>WP10-19</b>	2010	Reject	Requested modification of female deer season from Oct. 15-Dec. 31 to Sept. 15-Oct. 15
<b>WP10-20</b>	2010	Reject	Requested modification of the non-Federally qualified closure from Aug. 1-15 to July 24-31.



<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP10-22</b>	2010	Adopt with modification. The modification provided delegations to the ten USFS District Rangers via letter and was to apply only to wildlife. Any fish delegation requests would have to be submitted to the Board.	The delegated in-season management for wildlife on a species by species basis, by letter, to the ten District Rangers located in Units 1-5
<b>WSA11-01</b>	2011	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP12-08</b>	2012	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP14-03</b>	2014	Reject	Eliminate antlerless deer season
<b>WP14-04</b>	2014	Reject	Request early start date for Federally qualified users over 60 or disabled.
<b>WP16-01</b>	2016	Adopt with mod adding January season, but rejected non-qualified harvest reduction	Requested non-Federally qualified users be restricted to two deer and extension season closing date from Dec. 31 to Jan. 31
<b>WP16-05</b>	2016	Adopted	Requests the language stating the Unit 2 deer harvest limit may be reduced to four deer in times of conservation be removed
<b>WP16-08</b>	2016	Adopted	Requests deer harvest ticket #5 be validated out of sequence to record female deer taken in Unit 2.
<b>WP18-01</b>	2018	Adopt w/ mod to accept harvest limit restriction but oppose season reduction	Limit harvest to two deer from Federal public lands the reduce season by one week or more for non-Federally qualified subsistence users
<b>WP18-02</b>	2018	Adopted	Requested modification of deer C&T for Units 1-5 to all rural residents of Units 1-5.

<b>WP20–03 Executive Summary</b>	
<b>General Description</b>	Proposal WP20–03 requests the elimination of female deer harvest in Unit 2 and to only harvest antlered deer. <i>Submitted by: East Prince of Wales Fish and Game Advisory Committee.</i>
<b>Proposed Regulation</b>	<p><b>Unit 2—Deer</b></p> <p><del>5 antlered deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. A registration permit is required to take a female deer. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.</del> July 24 – Jan 31</p> <p><i>The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Oppose</b>

## DRAFT STAFF ANALYSIS WP20-03

### ISSUES

Proposal WP20-03, submitted by the East Prince of Wales Fish and Game Advisory Committee, requests the elimination of female deer harvest in Unit 2 and to only harvest antlered deer.

### DISCUSSION

The proponent believes that this regulation change is necessary because the harvest of female deer in Unit 2 is under reported and biologists are not getting factual information.

The proponent states that this regulation change is desperately needed to allow for future harvest of deer on POW Island, and that all resource users of Unit 2 have expressed a concern for the low deer population in recent years.

The proponent mentioned that the Alaska Board of Game (BOG) recently adopted regulations to increase the harvest of wolf and black bear on Prince of Wales, and that the next step is for the deer to repopulate. The proponent believes that in order for this to occur, the harvest of does should not be allowed.

The proponent also has added the term “antlered” into their proposed change following the harvest limit. During clarification over this addition, the proponent indicated they did not know why there had been a prior regulatory change from “antlered/antlerless” to “male/female”. The proponent believes most hunters will be looking for antlers as well for determining deer gender. Because of this factor, they are providing this proposed option for the Federal Subsistence Board (Board) to consider.

### Existing Federal Regulation

#### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer July 24-Jan. 31 may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.*

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15,*

*except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## **Proposed Federal Regulation**

### **Unit 2—Deer**

*5 antlered deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. A registration permit is required to take a female deer. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on-tag number five.* July 24–Jan. 31

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## **Existing State Regulation**

### **Unit 2 – Deer**

*Residents and non-residents: Four bucks* Aug. 1 – Dec. 31

*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.*

## **Extent of Federal Public Lands**

Unit 2 is comprised of 74% Federal public lands and consist of 73% U.S. Forest Service (USFS) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit Map**).

## **Customary and Traditional Use Determinations**

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

## Regulatory History

Hunting regulations have permitted the harvest of deer in Unit 2 since 1925 (**Appendix 1**). During this period, season closing dates have varied between November and December, with December 31 being the most common closing date since 1988. Seasons and harvest limits for Federally qualified subsistence users in Unit 2 are more liberal than State regulations. Federal regulations have allowed the harvest of one female deer in Unit 2 since 1995, as well as the harvest of five deer beginning in 2006.

Following years of numerous Unit 2 related deer proposals (**Appendix 2**) submitted to the Federal Subsistence Board (Board), the Unit 2 Deer Planning Subcommittee (Subcommittee) was formed in 2004 to address contentious deer management issues in Unit 2. At the request of the Board, the Council established the 12-member Subcommittee to address concerns that Federally qualified subsistence users in Unit 2 were unable to harvest enough deer to meet their needs. The Subcommittee included residents of Craig, Hydaburg, Ketchikan, Petersburg, Point Baker, and Wrangell, to reflect the range of users of Unit 2 deer, along with representatives from State and Federal wildlife management agencies.

The Subcommittee developed management recommendations at a series of five public meetings held in communities that depend upon Unit 2 deer. Both Federally and non-Federally qualified users participated at these meetings. The Subcommittee recommended that deer harvest management tools could be applied in Unit 2 as deer population trends and hunting use patterns changed. The degree to which these tools would be employed would be decided through the established public regulatory processes (SEASRAC 2006).

In 2006, the Board implemented two major changes to the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09, both with modification. Adoption of WP06-08 as modified, reopened a portion of Federal public lands to non-Federally qualified users on the southeast side of Prince of Wales Island. Adoption of WP06-09 as modified, established the current five deer harvest limit for Federally qualified subsistence users (FSB 2006). Two other proposals, WP06-06 and WP06-10, related to the use of harvest tickets in Unit 2 and were unanimously opposed by the Council and rejected by the Board (FSB 2006).

Three proposals related to Unit 2 deer were submitted from 2007-2012. Proposal WP07-07 requested the female deer season be closed, Proposal WP10-19 requested a change to the female deer season, and Proposal WP10-20 requested the August closure to non-Federally qualified users be lifted. The Council opposed and the Board rejected these proposals (FSB 2007, 2010).

Also during 2010, the Board adopted WP10-22 with modification delegating management authority for wildlife by letter to the ten District Rangers located in Units 1-5. As a result, the delegated authority in Unit 2 changed from the Tongass Forest Supervisor to the District Rangers of both the Craig and Thorne Bay Ranger Districts. For deer, their scope of delegation allows them to set harvest quotas; to close, reopen or adjust Federal subsistence deer seasons; and to adjust harvest and possession limits for that species. Most likely, this type of action would occur prior to the season. Any action greater than 60 days in length requires a public hearing before implementation. They may also close Federal Public lands to the take of this species to all users. This type of action would most likely take place during the season.

Action on the proposal also removed the requirement for consultation with the both Council Chair and ADF&G, as this was already defined protocol within the Special Action process (FSB 2010).

Two proposals were considered for deer in Unit 2 in 2013. Proposal WP14-03 requested the female deer season be eliminated whereas Proposal WP14-04 asked for an earlier season to be established for Federally qualified subsistence users over the age of 60 or physically disabled. The Council unanimously opposed and the Board rejected these proposals (SEASRAC 2013; FSB 2014).

Three proposals were considered for deer in Unit 2 in 2015. Proposal WP16-01 requested a harvest limit reduction for non-Federally qualified users as well as an extension of the Federal season through the month of January. This proposal was broken into two sub-proposals by the Council who opposed the harvest limit reduction but supported the season extension with the following justifications: 1) the Unit 2 deer population was stable; 2) January harvest was a traditional practice according to testimony; 3) any additional female deer harvest was believed to be minimal and sustainable; and 4) the USFS District Ranger in Unit 2 has delegated authority to close the season early if conservation needs arise. The Board adopted the proposal as modified by the Council. Proposal WP16-05 requested removal of language regarding a harvest limit reduction during times of conservation because that authority is included by delegation to the Federal in-season manager and WP16-08 requested harvest ticket #5 be used out of sequence when harvesting a female deer. Both proposals were unanimously supported by the Council and adopted by the Board (SEASRAC 2015; FSB 2016).

Proposal WP18-01 was considered during the 2018 regulatory cycle. The proposal requested a reduction of both the season length and the harvest limit for non-Federally qualified users. The Council divided the proposal into two action items where they supported the harvest limit reduction but opposed the shortening of the season. The Board adopted the harvest limit reduction as recommended by the Council based on testimony from Federally qualified subsistence users that they were not meeting their needs. The Board rejected the season date reduction because they believed the harvest limit reduction would not provide additional benefits as harvests in December were minimal by both user groups and that subsistence users already had additional priorities available in the form of; the week in July, the closure to non-Federally qualified users in August, the ability to harvest a female deer starting October 15th, a season extension into the month of January and the ability to harvest up to five deer total (SEASRAC 2017; FSB 2018a).

Due to administrative delays in the Federal Rule Making Process, on August 8, 2018, the Board approved temporary delegated authority to some Federal land managers to enact temporary changes to Federal Subsistence Regulations adopted by the Board during the April 2018 regulatory meeting (FSB 2018b). This delegation of authority was established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6). As a result, emergency special action 13-BD-06-18 was issued on August 16, 2018 by the USFS District Ranger restricting the harvest of deer by non-Federally qualified users to two male deer on Federal Public lands in Unit 2. The action was set to expire on October 15, 2018 or when the 2018-2020 Federal Subsistence Wildlife Regulations were published in the Federal Register.

Proposal WP18-02, requesting the Customary and Traditional use determination for deer in Units 1-5 be modified to include all rural residents of Units 1-5, was also considered during the 2018 regulatory cycle. This proposal had unanimous support from the Council and was adopted by the Board as a consensus agenda item (SEASRAC 2017; FSB 2018a).

### **Current Events**

The proponent also submitted WP20-04, -05, -06 and -07 regarding deer in Unit 2. The proponent was contacted to clarify the intent and reasoning of each proposal. The proponent stated that the overall intent was to provide the Board with a suite of management options to increase the deer population and hunter success in Unit 2. Additionally, WP20-02 was submitted by the Alaska Department of Fish and Game (ADF&G) requesting removal of the harvest limit reduction for non-Federally qualified users.

### **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation on steep slopes where there is less snow accumulation, and old-growth forests provide increased intermixing of snow-intercept and foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet energetic needs of lactating does. Some deer migrate and follow the greening vegetation up to alpine for the summer, while others remain at lower elevations. The breeding season, or rut, generally occurs late October through late November (ADF&G 2009) generally peaking around mid-November. Wolves and black bears are the primary predators present in Unit 2, and may reduce deer populations or increase recovery times after severe winters.

Deer populations in Southeast Alaska fluctuate and are primarily influenced by winter snow depths (Olson 1979). Deer in Southeast Alaska typically have trouble meeting their energy needs in winter (Hanley and McKendrick 1985, Parker et al. 1999), and winters with long periods of deep snow that restrict the availability of forage can result in deer depleting their energy reserves to the point of starvation (Olson 1979).

Summer nutrition is important for building body reserves to sustain deer through the winter (Stewart et al. 2005). Few studies have been conducted on summer habitat conditions because winter habitat carrying capacity is generally considered to be the limiting factor for deer in Southeast Alaska. However, deer populations at or above habitat carrying capacity are affected by intra-specific competition for food and may enter winter in reduced body condition compared to deer populations below carrying capacity (Kie et al. 2003, Stewart et al. 2005). This can result in higher susceptibility to severe winters and lower productivity (Kie et al. 2003, Stewart et al. 2005). In addition, nutritionally stressed does produce smaller and fewer fawns (Olson 1979).

### **Recent population indices**

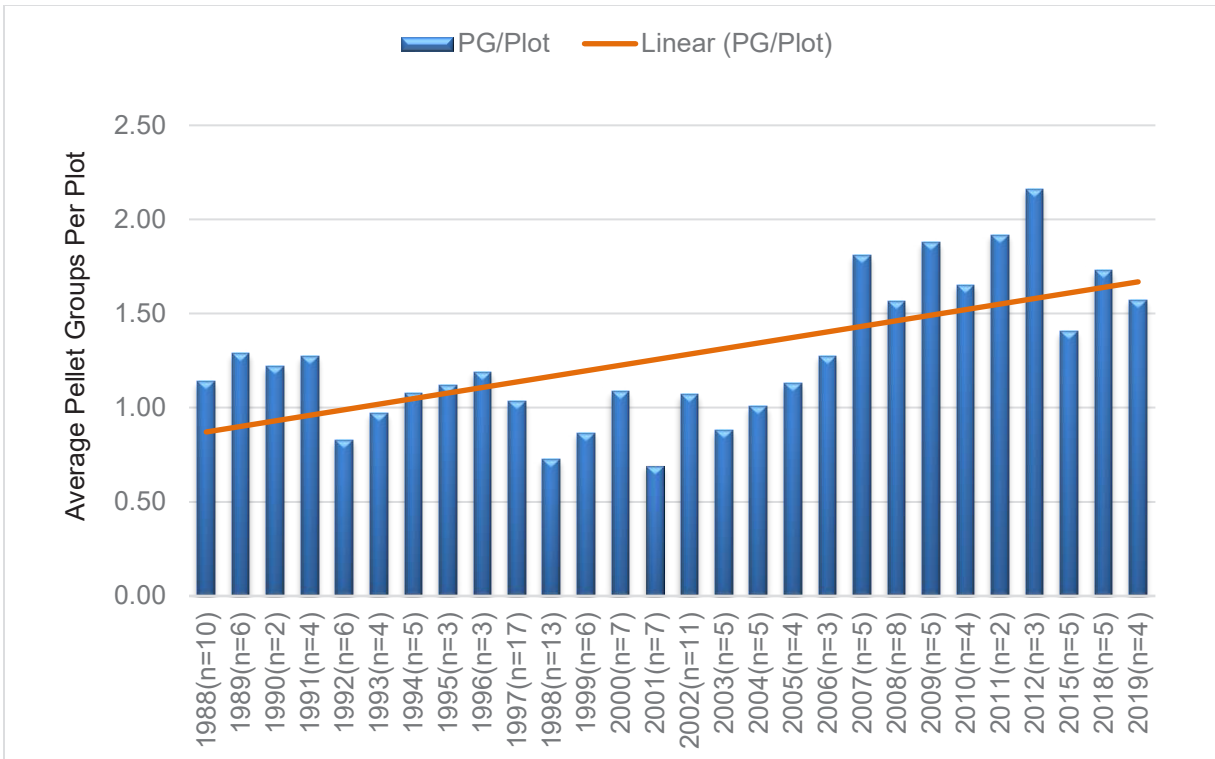
There are no methods to directly count deer in Southeast Alaska, so ADF&G conducts deer pellet surveys as an index to the relative abundance of the deer population. Relating pellet group data to population levels is difficult, however, because factors other than changes in deer population size can affect deer

pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same zones each year. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer (McCoy 2011).

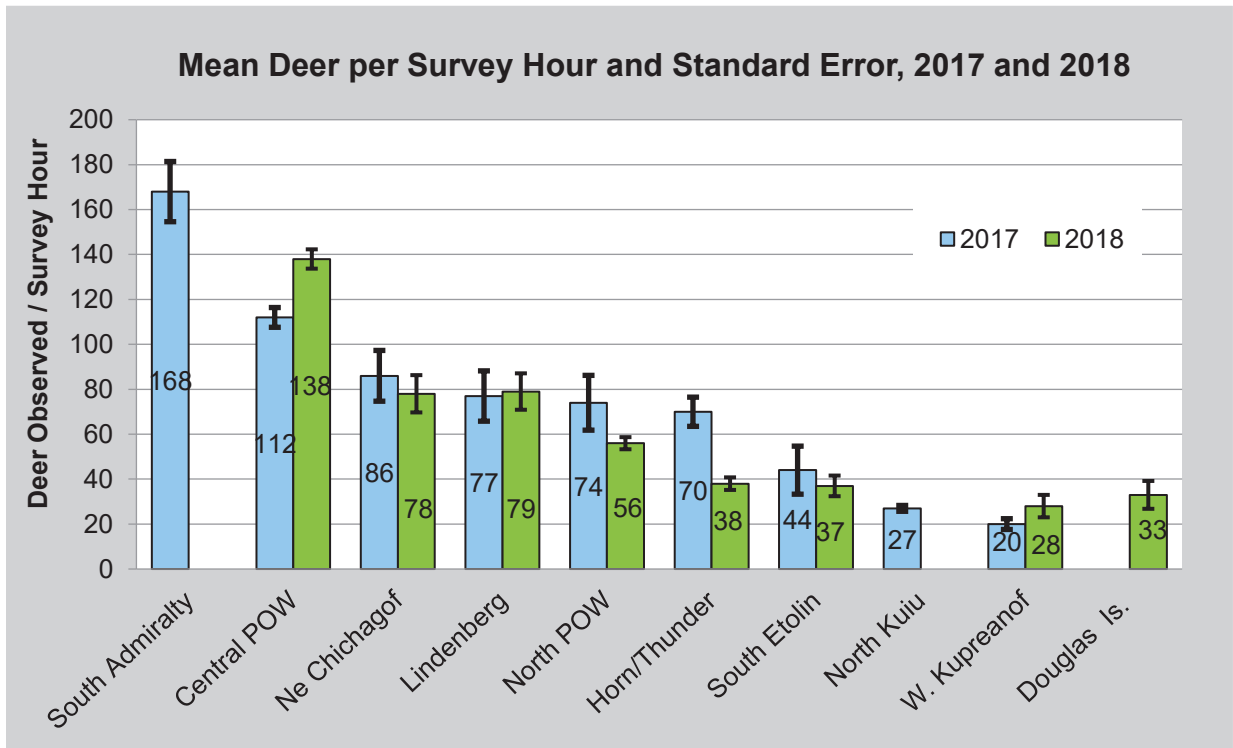
Brinkman et al. (2013) questioned the value of pellet-group surveys for monitoring population trends due to the variability in the data compared to DNA based pellet counts. Pellet group transects were designed to detect large (>30%) changes in abundance and are not an appropriate tool for monitoring smaller year to year changes. Although pellet-group surveys remain the only widely available deer population data, the results should be interpreted with caution. Pellet-group data in Unit 2 suggests a generally increasing population trend since a low during the late 1990s and early 2000s (**Figure 1**). This contrasts with Brinkman et al. (2011) who used a DNA based technique and estimated a 30% population decrease from 2006–2008 which they attributed to three consecutive winters with deep snow. Brinkman's study was limited to three watersheds, and the population changes during the study varied by watershed. It appears that populations subsequently increased after those severe winters and Bethune (2011) felt that by 2010 the Unit 2 deer population was healthy, stable to increasing, and at a 12-15 year high.

ADF&G began testing alpine deer aerial survey techniques in 2013 (**Figure 2**). 2017 was the first year with an established protocol and consistent surveys across southeast Alaska. ADF&G is still researching the correlation between alpine surveys and actual deer populations. Aerial survey numbers seem to reflect the relative abundances expected among various locations, but correlations with population trends are unknown at this time.





**Figure 1:** Annual average pellet group counts and general trend for deer in Unit 2 through 2019 (McCoy 2019a).



**Figure 2:** Aerial alpine surveys across southeast Alaska for 2017 and 2018 (McCoy 2019b).

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 and intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Deep snow deer winter range is defined as high value productive old growth (size class 5, 6, 7) on south facing slopes below 800 feet, and this is considered to be the limiting habitat for deer in Southeast Alaska. Some areas of Unit 2 have been impacted by large scale changes in habitat due to timber harvest, while the habitat is largely intact in other areas. Young-growth forest treatments (e.g., thinning, small gap creation, branch pruning) can benefit deer forage development in previously harvested stands. Regardless, areas with substantial timber harvest are expected to have lower long-term carrying capacity compared to pre-harvest conditions.

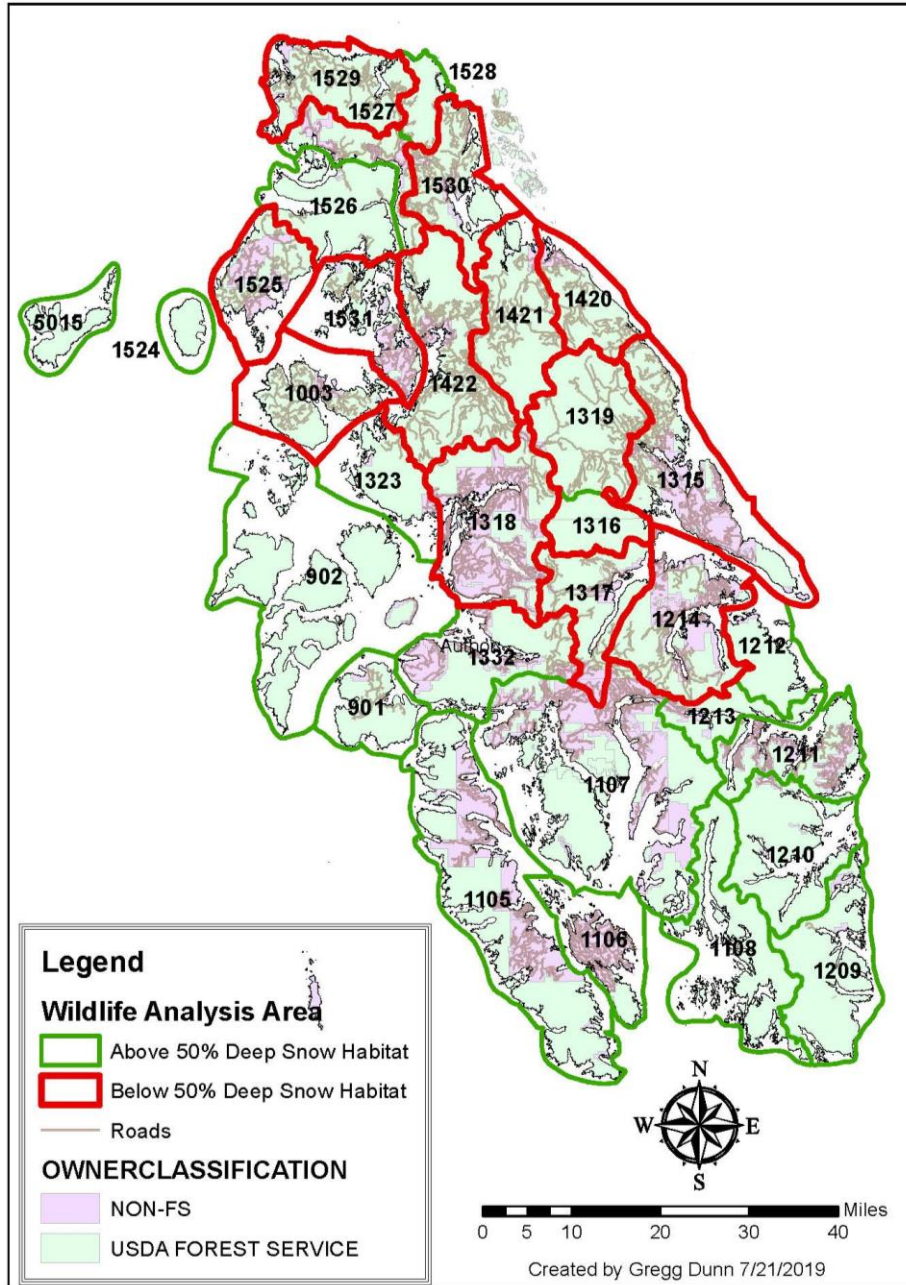
There is 62% of deer winter habitat remaining in GMU 2 (**Table 1**) with WAAs 1214, 1315, 1317, 1318, 1420, 1421, 1525, 1529, 1530, 1531 having below 50% habitat remaining. This is from past timber harvest and road building. In the case of a severe winter, these will be the areas hit hardest with deer mortality since there is little habitat left to sustain them. Habitat conditions would not improve as the areas harvested have reached stem exclusion which can last from 25 year post harvest to 150 years post-harvest. **Figure 3** can be used to see where the least amount of habitat remains and if you compare it to **Table 1** you can see where harvest is greatest compared to available habitat. Most wildlife analysis areas (WAA) with less than 50% deep snow deer winter habitat have the highest harvest rates.

Conditions on the ground within the last few years have remained stable because of mild winters and later arrival of snow in Unit 2 allowing the deer to forage longer at altitude and in areas such as muskegs. Prolonged snowpack during a severe winter or within later stages of winter could have a greater effect on deer populations going forward since there is far less habitat available during those periods.

**Table 1:** Overall percent of historical habitat since 1954 (beginning of large scale logging) remaining by wildlife analysis area (WAA) in GMU 2 for deep snow deer winter habitat and all productive old growth, average harvest since 2005, and harvest trend.

WAA	Productive Old Growth	Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)	Average Reported Harvest by WAA since 2005 and trend
901	89	85	69 ↑
902	100	100	79 ↓
1003	51	49	46 ↑
1105	99	99	84 ↑
1106	100	100	25 ↓
1107	97	93	138 ↑
1108	99	99	17 ↑
1209	100	100	10 ↑
1210	99	99	50 ↑
1211	83	78	36 ↑

<b>WAA</b>	<b>Productive Old Growth</b>	<b>Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)</b>	<b>Average Reported Harvest by WAA since 2005 and trend</b>
1213	99	99	21 ↑
1214	67	48	245 ↑
1315	55	29	350 ↑
1316	99	100	27 ↓
1317	56	23	145 ↑
1318	78	49	220 ↑
1319	74	61	229 ↓
1323	90	76	18 ↓
1332	80	72	76 →
1420	54	27	308 ↑
1421	71	44	107 ↓
1422	51	29	386 ↓
1525	51	40	21 ↑
1526	93	83	18 ↑
1527	67	61	23 ↓
1528	82	84	37 →
1529	55	46	144 ↓
1530	50	37	145 ↑
1531	55	49	37 ↓



**Figure 3:** Map of Unit 2 showing deep snow deer winter habitat availability and where habitat is below 50% in WAAs. Note: WAA 5015 is not part of Unit 2.

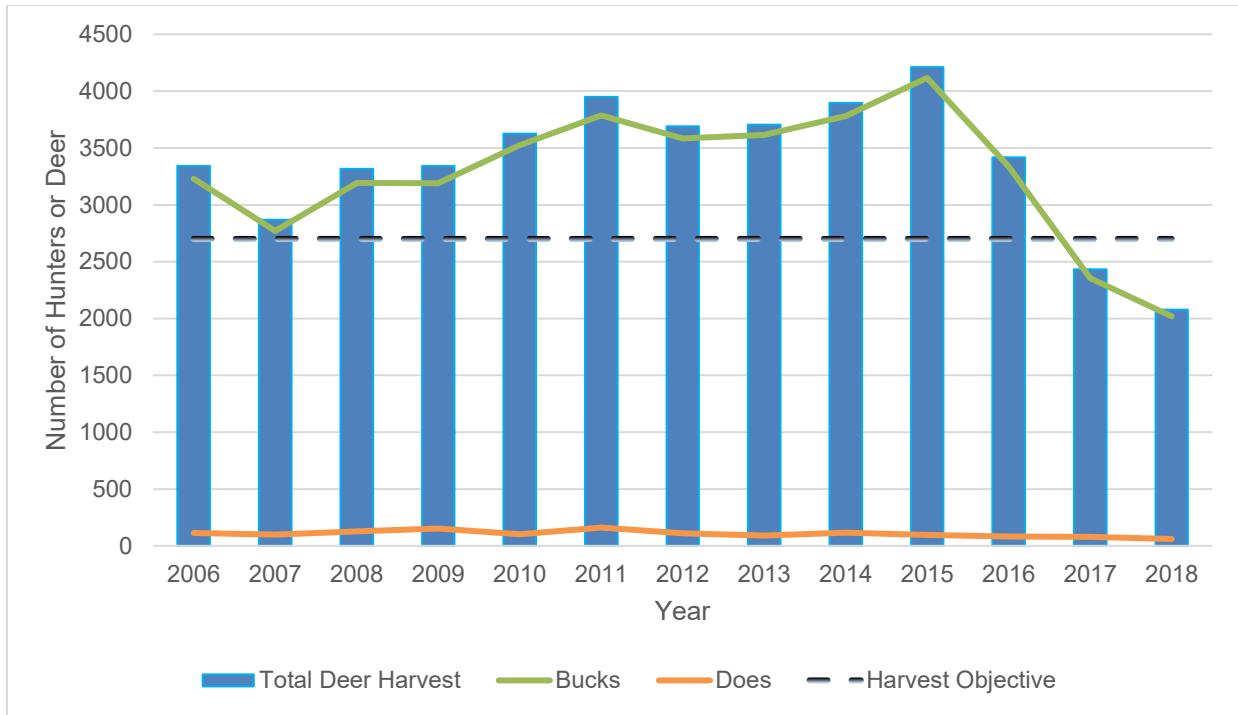
### Harvest History

Harvest data reported below are provided by ADF&G (McCoy 2019b) and are gathered by several reporting systems including the Region 1 (Southeast Alaska) deer survey, Unit 2 deer harvest report, and the State-wide deer harvest report. The Region 1 deer survey is the most consistent report, covering the years 1997–2010 and is based on a sample of hunters. In general, 35% of hunters from each community were sampled annually and while response rates vary by community, the overall response rate across

communities was approximately 60% each year. Harvest numbers were extrapolated using expansion factors that are calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response was low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and interpreted with caution. Trends, however, should be fairly accurate, especially at larger scales. The Unit 2 deer report was in place from 2005–2010 and was instituted specifically for reporting deer harvest in Unit 2. In 2011, the statewide deer report replaced the other deer harvest reporting systems and requires reporting of harvest by all deer hunters. Different expansion factors are used for the various data sets so that total harvest estimates between years are comparable (McCoy 2013).

Action taken by the Alaska Board of Game in fall 2000 established a harvest objective of 2,700 deer for Unit 2 as they identified the population as important for satisfying high levels of human consumptive use (Bethune 2013). Estimated deer harvest in Unit 2 from 2005–2017 can be found in **Figure 2**. The estimated average total annual harvest is 3,467 deer. Harvests have been at or above ADF&G’s Unit 2 harvest objective from 2005-2015 and fell below harvest objectives 2016-2017. Deer harvest and number of hunters reached historically high levels in 2015 and then began to decline through 2017.

Prior to implementation of Federal regulations, opportunity to harvest female or antlerless deer was available under State regulations from 1955-1972. From 1973-1977, opportunity for female deer was still available; however, the harvest limit was reduced. During the 1987 season, the opportunity to harvest one female deer under State regulations was re-implemented, but did not get extended due to the unpopularity of the hunt in many local communities. Harvest data for these years are not available.



**Figure 4:** Unit 2 total deer harvest and numbers of does and bucks harvested through 2018 (McCoy 2019b)

Reported deer harvests of female deer in Unit 2 (**Table 1**) have ranged from 60 to 119 animals. While the average reported female deer harvest increased to 107 since 2005, the female deer harvest percentage has actually decreased to 3.2% of the total reported deer harvest.

**Table 1:** Female deer harvest compared to overall deer harvest, Unit 2 2005-2018 (McCoy 2019b)

Regulatory year	Female deer harvest	Total deer harvest	Percent of harvest (female)
2005	103	2642	3.9
2006	90	3105	2.9
2007	87	2795	3.1
2008	112	3222	3.5
2009	107	3145	3.4
2010	88	3428	2.6
2011	106	3746	2.8
2012	96	3696	2.6
2013	77	3677	2.1
2014	119	3931	3.0
2015	96	4243	2.3
2016	84	3534	2.4
2017	79	2433	3.2
2018	60	2079	2.9
<b>Average</b>	<b>107</b>	<b>3329</b>	<b>3.2</b>

### Other Mortality

It is believed that Unit 2 has one of the highest illegal and unreported harvest rates in the region, estimated to be equal to the legal harvest (Table 5 in Bethune 2015). That estimate is based on anecdotal reports, interviews with law enforcement personnel, and fates of radio-collared deer. If that estimate is correct, over 4% of the estimated 75,000 deer in Unit 2 may be illegally harvested each year. This high illegal take is likely due in large part to the extensive and remote road system and few law enforcement personnel patrolling the unit.

Flynn and Suring (1989) reported that actual mortality from legal hunting could be 38% greater than the estimated harvest because of unknown or unreported crippling loss. Field observations and voluntary reports of wounding loss suggest that this estimate might be conservative.

Historically and prior to extensive road paving on the island, deer/vehicle collisions were rare (10–25 deer/year) and were not considered a significant source of mortality. However, the collision risk increased with completion in 2003 of extensive new POW highway paving projects, which now extend from Craig to Coffman Cove and east to Thorne Bay. Construction and paving of the main 30 road to Coffman Cove was completed in 2008. Construction is currently underway to extend the paved surface of Road 20 to Whale Pass. Higher vehicle speeds, as well as an attractive food source created by planting grass for erosion control near the roads will likely cause more deer/vehicle collisions, prompting managers to raise estimates to 30-50 deer per year beginning in 2004.

### **Effects of the Proposal**

If the proposal is adopted, harvest opportunity for Federally qualified subsistence users will decrease. Besides prohibiting the harvest of female deer, adopting the proposal also implements an antler requirement for harvesting deer which could further decrease harvest opportunity of both yearling bucks throughout the season, as well as some mature bucks later in the season that have either dropped their antlers or lose their antlers during the act of harvesting the animal. It is not uncommon in December for antlers to separate from male deer during harvest, which could unintentionally put Federally qualified subsistence users in violation of Federal regulation. The antler requirement would result in Federal regulations being more restrictive than State regulations, contrary to the rural priority mandated by ANILCA.

Buck-only harvest may alter buck/doe ratios and the age structure of the male population. It does not reduce the reproductive potential of the population because the same number of does are still bred by remaining bucks. Hunters sometimes blame declines in the number of fawns per doe on a scarcity of bucks or a lack of mature bucks available to do the breeding. However, research has failed to support a biologically meaningful relationship; the number of bucks per 100 does is unrelated to fawn recruitment the following year (Zwank 1976, Erickson et al. 2003). Therefore, harvest management of “bucks only” has the potential to maintain a larger population available for harvest, though this is subject to limiting factors such as current and future habitat carrying capacity of Unit 2 and possible severe weather events.

Adoption of the proposal could benefit deer populations by making more deer available for reproduction. While harvest data suggests that female deer harvest is on average 3.2% of the total harvest (McCoy 2019b), the data does not indicate whether harvested male deer were antlered or not. It is believed the majority of male deer taken are antlered at time of harvest, so the number of additional male deer made unavailable is most likely very low. With such low levels of additional deer made available for reproduction, adoption of the proposal will not have any positive effects on the health of deer populations in Unit 2, as deer populations are more greatly affected by available habitat and winter weather conditions rather than harvest.

## **OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP20-03.

### **Justification**

Continued availability of the female deer season is important for maintaining harvest opportunity for Federally qualified subsistence users. During past wildlife regulatory cycles, the Board has opposed the elimination of antlerless harvest of deer in Unit 2 many times. The Board has justified this opposition as testimony has indicated the harvest of female deer is customary and traditional, and deer populations have been stable (FSB 1995, OSM 1995). Although some smaller geographical areas in Unit 2 may have slight declines, current pellet count data suggests the majority of the deer population across Unit 2 is stable, so female deer harvest does not need to be prohibited for conservation.

Implementing an antler requirement for male deer will further reduce harvest opportunity, while potentially creating unintentional violations in Unit 2. Based on current definitions of antlered and antlerless, adopting the proposal will make the harvest of any male deer without antlers illegal, and would include any male deer that loses their antlers in the act of harvest.

Reported female deer harvest is only averaging 3.2% of the overall deer harvest in Unit 2. With such low levels of harvest, adoption of the proposal will not have any positive effects on the health of deer populations in Unit 2, as deer populations are more greatly affected by available habitat and winter weather conditions rather than harvest.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

**APPENDICES**

**Appendix 1: Regulatory framework of State and Federal deer seasons by year since 1925**

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
<b>1925</b>	Open	Sept 15-Dec 16	3	Buck, 3" antlers or longer
<b>1925-1929</b>	Open	Sept 1-Nov 30	3	Buck, 3" antlers or longer
<b>1930-1941</b>	Open	Aug 20-Nov 15	2	Buck, 3" antlers or longer
<b>1942-1943</b>	Resident	Sept 16-Nov 15	2	Buck, 3" antlers or longer
<b>1942-1943</b>	Non-resident	Sept 16-Nov 15	1	Buck, 3" antlers or longer
<b>1944-1948</b>	Resident	Sept 1-Nov 7	2	Buck, 3" antlers or longer
<b>1944-1948</b>	Non-resident	Sept 1-Nov 7	1	Buck, 3" antlers or longer
<b>1949</b>	Resident	Sept 1-Nov 15	2	Buck, 3" antlers or longer
<b>1949</b>	Non-resident	Sept 1-Nov 15	1	Buck, 3" antlers or longer
<b>1950-1951</b>	Resident	Aug 20-Nov 15	2	Buck, 3" antlers or longer
<b>1950-1951</b>	Non-resident	Aug 20-Nov 15	1	Buck, 3" antlers or longer
<b>1952</b>	Open	Aug 20-Nov 22	2	Buck, 3" antlers or longer
<b>1953-1954</b>	Open	Aug 20-Nov 22	3	Buck, 3" antlers or longer
<b>1955</b>	Open	Aug 20-Nov 22	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 15-Nov 22
<b>1956</b>	Open	Aug 20-Nov 26	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 13-Nov 26
<b>1957-1959</b>	Open	Aug 20-Nov 30	4	4 deer, does may be taken Oct 15-Nov 30
<b>1960</b>	Open	Aug 20-Dec 15	4	4 deer, does may be taken Oct 15-Nov 30

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
<b>1961</b>	Open	Aug 20-Nov 30	4	4 deer, antlerless deer may be taken Sept 15-Nov 30
<b>1962</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1963-1967</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1968</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1969-1971</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1972</b>	Open	Aug 1-Dec 31	3	3 deer, antlerless deer may be taken Nov 1-Nov 30
<b>1973-1977</b>	Open	Aug 1-Nov 30	3	1 antlerless deer may be taken Nov 1-Nov 30
<b>1978-1984</b>	Open	Aug 1-Nov 30	3	Antlered deer
<b>1985-1986</b>	State General	Aug 1-Nov 30	3	Antlered deer
<b>1987</b>	State General	Aug 1-Nov 30	4	1 antlerless deer may be taken Oct 10-Oct 31
<b>1988-2018</b>	State General	Aug 1-Dec 31	4	Antlered deer/bucks
<b>1991-1994</b>	Federal Subsistence	Aug 1-Dec 31	4	Antlered deer
<b>1995-1997</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken only during Oct 15-Dec 31
<b>1998-2002</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only

Year	Type of Season	Season	Limit	Conditions & Limitations
2003-2005	Federal Subsistence	July 24-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
2006-2009	Federal Subsistence	July 24-Dec 31	5	No more than one may be an antlerless deer; antlerless deer may be taken Oct 15-Dec 31
2010-2015	Federal Subsistence	July 24-Dec 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Dec 31
2016-2018	Federal Subsistence	July 24-Jan 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Jan 31.

**Appendix 2:** History of Federal regulatory actions related to deer in Unit 2 taken by the Federal Subsistence Board

Proposal number	Reg Year	FSB action	Proposal request
P95-01	1995	Adopt w/ mod to require harvest report requirement	Create an antlerless season in Unit 2
R95-09	1995	Reject	Requested rescinding antlerless deer season created by adoption of P95-01
P97-07	1997	Reject	Reduce deer season from Aug. 1-Dec. 31 to Sept. 1-Dec. 31, and eliminate harvest of antlerless deer in Unit 2.
P98-09	1998	Reject	Eliminate antlerless season
P98-10	1998	Reject	Eliminate antlerless season and apply antler restriction of forked horn or larger
P98-11	1998	Reject	Shorten deer season from Sept 1 -Nov. 30
P98-12	1998	Reject	Eliminate antlerless season
P00-005	2000	Reject	Eliminate antlerless season



<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>P00-05</b>	2000	Reject	Eliminate antlerless deer season
<b>P00-06</b>	2000	Reject	Community harvest permit request of 500 deer per Unit 2 community
<b>WP01-03</b>	2001	Reject	Eliminate antlerless deer season
<b>WP02-08</b>	2002	Reject	Request increase of deer harvest limit for Unit 2 residents and reduction for Unit 1A and 3 residents
<b>WP02-09</b>	2002	Took no action	Restrict non-Federally qualified users from hunting on Federal lands between Aug. 1-31 and Oct. 16-Nov. 14
<b>WRFR02-01</b>	2002	Reject	Requested reconsideration of the Board rejecting WP02-09 to close Federal lands in Unit 2.
<b>WP03-04</b>	2003	Adopt with modification adding one week in July at front of season (July 24-31)	Requested earlier extension of deer season for Federally qualified users
<b>WP03-05</b>	2003	Adopt with modification restricting non-Federally qualified users from Aug 1-21 on Federal Public Lands on Prince of Wales Island (closure for 1 year)	Requested closure of Federal public lands from Aug 1-Sept. 1 and reduction of harvest limit to 2 deer for non-Federally qualified subsistence users.
<b>WP04-03</b>	2004	Took no action	Requested closure be changed from Aug 1-21 to Oct. 16-Nov. 14 and reduction of harvest limit for non-Federally qualified users
<b>WP04-04</b>	2004	Took no action	Requested antlerless deer season be modified from Oct. 15-Dec. 31 to Aug. 1-Sept. 15
<b>WP04-05</b>	2004	Took no action	Requested closure to non-Federally qualified users be reduced by one week
<b>WP04-06</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-07</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-08</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP04-09</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with antler restrictions for non-Federally qualified users.
<b>WP04-10</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with a 3 buck harvest limit for non-Federally qualified users.
<b>WP04-11</b>	2004	Took no action	Requested removal of the July 24 start date for subsistence users and to modify closure from Aug. 1-21 to Oct. 16-Dec. 31 and implement a 2 buck harvest limit for non-Federally qualified users.
<b>WP04-12</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-Jan. 31 for subsistence users and modified the August closure to the month of January to all but Unit 2 residents
<b>WP04-13</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-10 and removing the antlerless deer season for subsistence users and reducing the August closure from Aug. 1-10 for non-Federally qualified users.
<b>WP04-14</b>	2004	Took no action	Reduce deer season from July24-Dec. 31 to Aug. 1-Dec. 31for Federally qualified users in Unit 2.
<b>WP04-15</b>	2004	Adopt with modification restricting non-Federally qualified users from Aug 1-15 on Federal Public Lands on Prince of Wales Island	Requested continuation of the one year closure as passed by the FSB during the 2003 regulatory cycle.
<b>WP05-04</b>	2005	Adopt with modification removing registration requirement, but required use of a joint State/Federal harvest report as recommended by the Unit 2 Deer Subcommittee	Requested that all hunters obtain a Federal registration permit to hunt deer in Unit 2.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP06-06</b>	2006	Reject	Requested removing sequential use of harvest tickets and possession of all unused harvest ticket requirements.
<b>WP06-07</b>	2006	Took no action	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-08</b>	2006	Adopt with modification. Modifications included: 1) removal of the August closure on SE portion of Prince of Wales Island; 2) rejected closure to non-Federally qualified users on Suemez Island; and 3) rejected a closure to non-Federally qualified users on the islands located along the SW coast of Prince of Wales Island.	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-09</b>	2006	Adopt with modification. The Board modified the Council recommendation by eliminating the need to have a Federal permit for harvesting a 5th deer. The Board also delegated the Forest Supervisor the ability to lower the harvest limit to 4 deer if needed.	Requested increasing the deer harvest limit to 6 deer.
<b>WP06-10</b>	2006	Reject	Requested use of harvest ticket #1 to record harvest of a female deer.
<b>WP07-07</b>	2007	Reject	Requested either elimination of antlerless deer hunt or to only allow for antlerless deer harvest every other year.
<b>WP10-19</b>	2010	Reject	Requested modification of female deer season from Oct. 15-Dec. 31 to Sept. 15-Oct. 15
<b>WP10-20</b>	2010	Reject	Requested modification of the non-Federally qualified closure from Aug. 1-15 to July 24-31.
<b>WSA11-01</b>	2011	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP12-08</b>	2012	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP14-03</b>	2014	Reject	Eliminate antlerless deer season
<b>WP14-04</b>	2014	Reject	Request early start date for Federally qualified users over 60 or disabled.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP16-01</b>	2016	Adopt with mod adding January season, but rejected non-qualified harvest reduction	Requested non-Federally qualified users be restricted to two deer and extension season closing date from Dec. 31 to Jan. 31
<b>WP16-05</b>	2016	Adopted	Requests the language stating the Unit 2 deer harvest limit may be reduced to four deer in times of conservation be removed
<b>WP16-08</b>	2016	Adopted	Requests deer harvest ticket #5 be validated out of sequence to record female deer taken in Unit 2.
<b>WP18-01</b>	2018	Adopt w/ mod to accept harvest limit restriction but oppose season reduction	Limit harvest to two deer from Federal public lands the reduce season by one week or more for non-Federally qualified subsistence users
<b>WP18-02</b>	2018	Adopted	Requested modification of deer C&T for Units 1-5 to all rural residents of Units 1-5.

<b>WP20–04 Executive Summary</b>	
<b>General Description</b>	<p>Proposal WP20–04 requests the elimination of female deer harvest and to only harvest antlered deer for one regulatory cycle in Unit 2.  <i>Submitted by: East Prince of Wales Fish and Game Advisory Committee.</i></p>
<b>Proposed Regulation</b>	<p><b>Unit 2—Deer</b></p> <p><i>5 antlered deer; however, unless otherwise specified, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. From July 1<sup>st</sup>, 2020 until June 30<sup>th</sup>, 2022 the harvest of female deer is prohibited. Beginning July 1, 2022, female deer may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.</i></p> <p><i>The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.</i></p> <p style="text-align: right;"><i>July 24 – Jan 31</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	

<b>WP20–04 Executive Summary</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Oppose</b>

## DRAFT STAFF ANALYSIS WP20-04

### ISSUES

Wildlife Proposal WP20-04, submitted by the East Prince of Wales Fish and Game Advisory Committee, requests that Unit 2 deer harvest be changed to five antlered deer for the 2020-2022 regulatory cycle, after which the harvest of one female deer per season be permitted after October 15 if five subsistence deer have not been harvested.

### DISCUSSION

The proponent believes the change is desperately needed to allow for future harvest of deer on Prince of Wales Island. For several years, the predator populations have been drastically increasing, while the deer populations have been decreasing. The harvest data shows over 4,500 deer were harvested in 2015 in Unit 2. The harvest decreased to fewer than 2,500 deer by 2017. The estimated reported doe harvest was almost 100 in 2015 and was reduced to 80 in 2017.

The proponent offers that all users of Unit 2 have expressed a concern for the low deer population in recent years. The Alaska Board of Game recently adopted regulations to increase the harvest of wolf and black bear on Prince of Wales. The next step is for the deer to re-populate. In doing so, the harvest of does cannot occur. The doe season will have a negative effect on rebuilding the deer population in Unit 2. A healthy deer population is a key part of life on Prince of Wales Island.

With very little support for the doe harvest to continue, the regulation needs to be changed to read for an antlered deer harvest only during the next regulation cycle of July 1, 2020 through June 30, 2022. This closure will aid in rebuilding the Unit 2 deer population and automatically allow the take of one female deer beginning October 15, 2022. The proponent desires the doe hunt be automatically reintroduced after Jun. 30, 2022 if a hunter has not already harvested five antlered deer.

### Existing Federal Regulation

#### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer July 24-Jan. 31  
may be taken only during the period Oct. 15–Jan. 31. Harvest ticket  
number five must be used when recording the harvest of a female deer,  
but may be used for recording the harvest of a male deer. Harvest  
tickets must be used in order except when recording a female deer on  
tag number five.*

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## **Proposed Federal Regulation**

### **Unit 2—Deer**

*5 antlered deer; however, unless otherwise specified, no more than one may be a female deer. Female deer may be taken only during the period ~~Oct. 15–Jan. 31~~. **From July 1<sup>st</sup>, 2020 until June 30<sup>th</sup>, 2022 the harvest of female deer is prohibited. Beginning July 1, 2022, female deer may be taken only during the period Oct. 15–Jan. 31.** Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.* July 24-Jan. 31

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## **Existing State Regulation**

### **Unit 2 – Deer**

*Residents and non-residents: Four bucks* Aug. 1 – Dec. 31

*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.*

## **Extent of Federal Public Lands**

Unit 2 is comprised of 74% Federal public lands and consist of 73% U.S. Forest Service (USFS) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit Map**).



## **Customary and Traditional Use Determinations**

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

## **Regulatory History**

Hunting regulations have permitted the harvest of deer in Unit 2 since 1925 (**Appendix 1**). During this period, season closing dates have varied between November and December, with December 31 being the most common closing date since 1988. Seasons and harvest limits for Federally qualified subsistence users in Unit 2 are more liberal than State regulations. Federal regulations have allowed the harvest of one female deer in Unit 2 since 1995, as well as the harvest of five deer beginning in 2006.

Following years of numerous Unit 2 related deer proposals (**Appendix 2**) submitted to the Federal Subsistence Board (Board), the Unit 2 Deer Planning Subcommittee (Subcommittee) was formed in 2004 to address contentious deer management issues in Unit 2. At the request of the Board, the Council established the 12-member Subcommittee to address concerns that Federally qualified subsistence users in Unit 2 were unable to harvest enough deer to meet their needs. The Subcommittee included residents of Craig, Hydaburg, Ketchikan, Petersburg, Point Baker, and Wrangell, to reflect the range of users of Unit 2 deer, along with representatives from State and Federal wildlife management agencies.

The Subcommittee developed management recommendations at a series of five public meetings held in communities that depend upon Unit 2 deer. Both Federally and non-Federally qualified users participated at these meetings. The Subcommittee recommended that deer harvest management tools could be applied in Unit 2 as deer population trends and hunting use patterns changed. The degree to which these tools would be employed would be decided through the established public regulatory processes (SEASRAC 2006).

In 2006, the Board implemented two major changes to the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09, both with modification. Adoption of WP06-08 as modified, reopened a portion of Federal public lands to non-Federally qualified users on the southeast side of Prince of Wales Island. Adoption of WP06-09 as modified, established the current five deer harvest limit for Federally qualified subsistence users (FSB 2006). Two other proposals, WP06-06 and WP06-10, related to the use of harvest tickets in Unit 2 and were unanimously opposed by the Council and rejected by the Board (FSB 2006).

Three proposals related to Unit 2 deer were submitted from 2007-2012. Proposal WP07-07 requested the female deer season be closed, Proposal WP10-19 requested a change to the female deer season, and Proposal WP10-20 requested the August closure to non-Federally qualified users be lifted. The Council opposed and the Board rejected these proposals (FSB 2007, 2010).

Also during 2010, the Board adopted WP10-22 with modification delegating management authority for wildlife by letter to the ten District Rangers located in Units 1-5. As a result, the delegated authority in Unit 2 changed from the Tongass Forest Supervisor to the District Rangers of both the Craig and Thorne

Bay Ranger Districts. For deer, their scope of delegation allows them to set harvest quotas; to close, reopen or adjust Federal subsistence deer seasons; and to adjust harvest and possession limits for that species. Most likely, this type of action would occur prior to the season. Any action greater than 60 days in length requires a public hearing before implementation. They may also close Federal Public lands to the take of this species to all users. This type of action would most likely take place during the season. Action on the proposal also removed the requirement for consultation with the both Council Chair and ADF&G, as this was already defined protocol within the Special Action process (FSB 2010).

Two proposals were considered for deer in Unit 2 in 2013. Proposal WP14-03 requested the female deer season be eliminated whereas Proposal WP14-04 asked for an earlier season to be established for Federally qualified subsistence users over the age of 60 or physically disabled. The Council unanimously opposed and the Board rejected these proposals (SEASRAC 2013; FSB 2014).

Three proposals were considered for deer in Unit 2 in 2015. Proposal WP16-01 requested a harvest limit reduction for non-Federally qualified users as well as an extension of the Federal season through the month of January. This proposal was broken into two sub-proposals by the Council who opposed the harvest limit reduction but supported the season extension with the following justifications: 1) the Unit 2 deer population was stable; 2) January harvest was a traditional practice according to testimony; 3) any additional female deer harvest was believed to be minimal and sustainable; and 4) the USFS District Ranger in Unit 2 has delegated authority to close the season early if conservation needs arise. The Board adopted the proposal as modified by the Council. Proposal WP16-05 requested removal of language regarding a harvest limit reduction during times of conservation because that authority is included by delegation to the Federal in-season manager and WP16-08 requested harvest ticket #5 be used out of sequence when harvesting a female deer. Both proposals were unanimously supported by the Council and adopted by the Board (SEASRAC 2015; FSB 2016).

Proposal WP18-01 was considered during the 2018 regulatory cycle. The proposal requested a reduction of both the season length and the harvest limit for non-Federally qualified users. The Council divided the proposal into two action items where they supported the harvest limit reduction but opposed the shortening of the season. The Board adopted the harvest limit reduction as recommended by the Council based on testimony from Federally qualified subsistence users that they were not meeting their needs. The Board rejected the season date reduction because they believed the harvest limit reduction would not provide additional benefits as harvests in December were minimal by both user groups and that subsistence users already had additional priorities available in the form of; the week in July, the closure to non-Federally qualified users in August, the ability to harvest a female deer starting October 15th, a season extension into the month of January and the ability to harvest up to five deer total (SEASRAC 2017; FSB 2018a).

Due to administrative delays in the Federal Rule Making Process, on August 8, 2018, the Board approved temporary delegated authority to some Federal land managers to enact temporary changes to Federal Subsistence Regulations adopted by the Board during the April 2018 regulatory meeting (FSB 2018b). This delegation of authority was established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6). As a result, emergency special action 13-BD-06-18 was issued on August 16, 2018 by the

USFS District Ranger restricting the harvest of deer by non-Federally qualified users to two male deer on Federal Public lands in Unit 2. The action was set to expire on October 15, 2018 or when the 2018-2020 Federal Subsistence Wildlife Regulations were published in the Federal Register.

Proposal WP18-02, requesting the Customary and Traditional use determination for deer in Units 1-5 be modified to include all rural residents of Units 1-5, was also considered during the 2018 regulatory cycle. This proposal had unanimous support from the Council and was adopted by the Board as a consensus agenda item (SEASRAC 2017; FSB 2018a).

### **Current Events**

The proponent also submitted WP20-03, -05, -06 and -07 regarding deer in Unit 2. The proponent was contacted to clarify the intent and reasoning of each proposal. The proponent stated that the overall intent was to provide the Board with a suite of management options to increase the deer population and hunter success in Unit 2. Additionally, WP20-02 was submitted by the Alaska Department of Fish and Game (ADF&G) requesting removal of the harvest limit reduction for non-Federally qualified users.

### **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation on steep slopes where there is less snow accumulation, and old-growth forests provide increased intermixing of snow-intercept and foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet energetic needs of lactating does. Some deer migrate and follow the greening vegetation up to alpine for the summer, while others remain at lower elevations. The breeding season, or rut, generally occurs late October through late November (ADF&G 2009) generally peaking around mid-November. Wolves and black bears are the primary predators present in Unit 2, and may reduce deer populations or increase recovery times after severe winters.

Deer populations in Southeast Alaska fluctuate and are primarily influenced by winter snow depths (Olson 1979). Deer in Southeast Alaska typically have trouble meeting their energy needs in winter (Hanley and McKendrick 1985, Parker et al. 1999), and winters with long periods of deep snow that restrict the availability of forage can result in deer depleting their energy reserves to the point of starvation (Olson 1979).

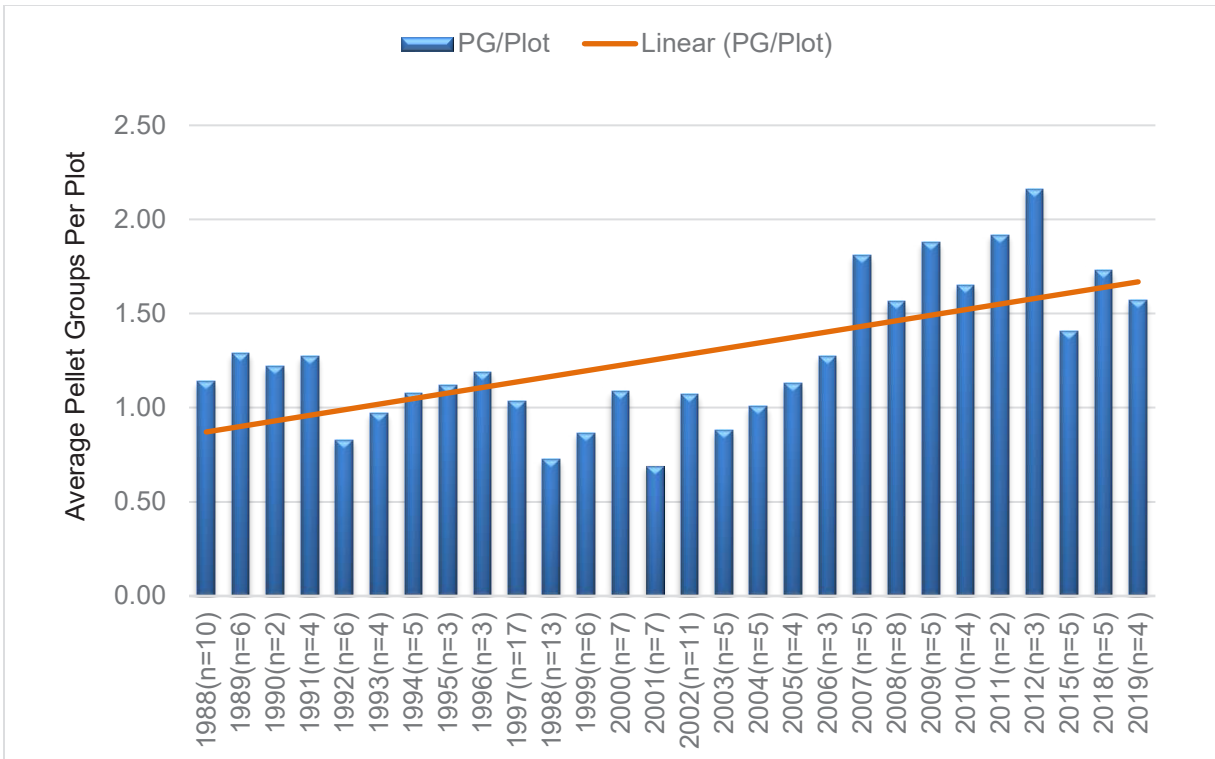
Summer nutrition is important for building body reserves to sustain deer through the winter (Stewart et al. 2005). Few studies have been conducted on summer habitat conditions because winter habitat carrying capacity is generally considered to be the limiting factor for deer in Southeast Alaska. However, deer populations at or above habitat carrying capacity are affected by intra-specific competition for food and may enter winter in reduced body condition compared to deer populations below carrying capacity (Kie et al. 2003, Stewart et al. 2005). This can result in higher susceptibility to severe winters and lower productivity (Kie et al. 2003, Stewart et al. 2005). In addition, nutritionally stressed does produce smaller and fewer fawns (Olson 1979).

### Recent population indices

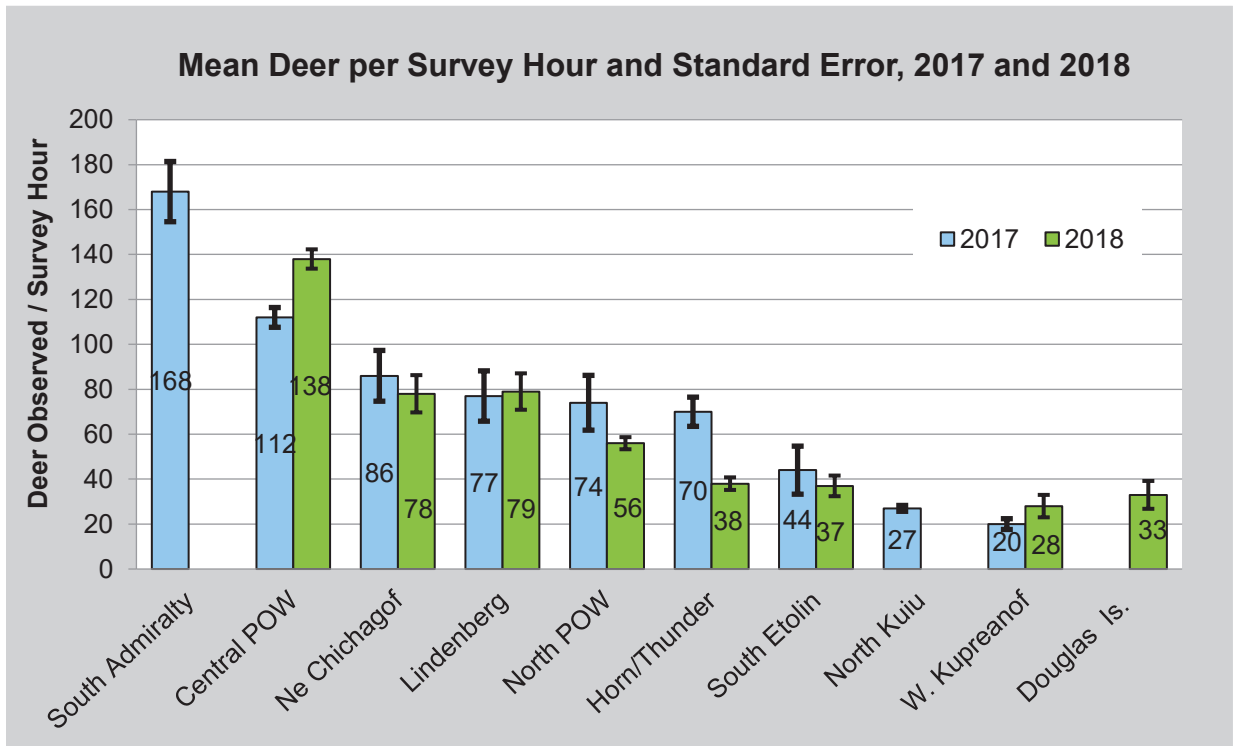
There are no methods to directly count deer in Southeast Alaska, so ADF&G conducts deer pellet surveys as an index to the relative abundance of the deer population. Relating pellet group data to population levels is difficult, however, because factors other than changes in deer population size can affect deer pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same zones each year. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer (McCoy 2011).

Brinkman et al. (2013) questioned the value of pellet-group surveys for monitoring population trends due to the variability in the data compared to DNA based pellet counts. Pellet group transects were designed to detect large (>30%) changes in abundance and are not an appropriate tool for monitoring smaller year to year changes. Although pellet-group surveys remain the only widely available deer population data, the results should be interpreted with caution. Pellet-group data in Unit 2 suggests a generally increasing population trend since a low during the late 1990s and early 2000s (**Figure 1**). This contrasts with Brinkman et al. (2011) who used a DNA based technique and estimated a 30% population decrease from 2006–2008 which they attributed to three consecutive winters with deep snow. Brinkman's study was limited to three watersheds, and the population changes during the study varied by watershed. It appears that populations subsequently increased after those severe winters and Bethune (2011) felt that by 2010 the Unit 2 deer population was healthy, stable to increasing, and at a 12-15 year high.

ADF&G began testing alpine deer aerial survey techniques in 2013 (**Figure 2**). 2017 was the first year with an established protocol and consistent surveys across southeast Alaska. ADF&G is still researching the correlation between alpine surveys and actual deer populations. Aerial survey numbers seem to reflect the relative abundances expected among various locations, but correlations with population trends are unknown at this time.



**Figure 1:** Annual average pellet group counts and general trend for deer in Unit 2 through 2019 (McCoy 2019a).



**Figure 2:** Aerial alpine surveys across southeast Alaska for 2017 and 2018 (McCoy 2019b).

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 and intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Deep snow deer winter range is defined as high value productive old growth (size class 5, 6, 7) on south facing slopes below 800 feet, and this is considered to be the limiting habitat for deer in Southeast Alaska. Some areas of Unit 2 have been impacted by large scale changes in habitat due to timber harvest, while the habitat is largely intact in other areas. Young-growth forest treatments (e.g., thinning, small gap creation, branch pruning) can benefit deer forage development in previously harvested stands. Regardless, areas with substantial timber harvest are expected to have lower long-term carrying capacity compared to pre-harvest conditions.

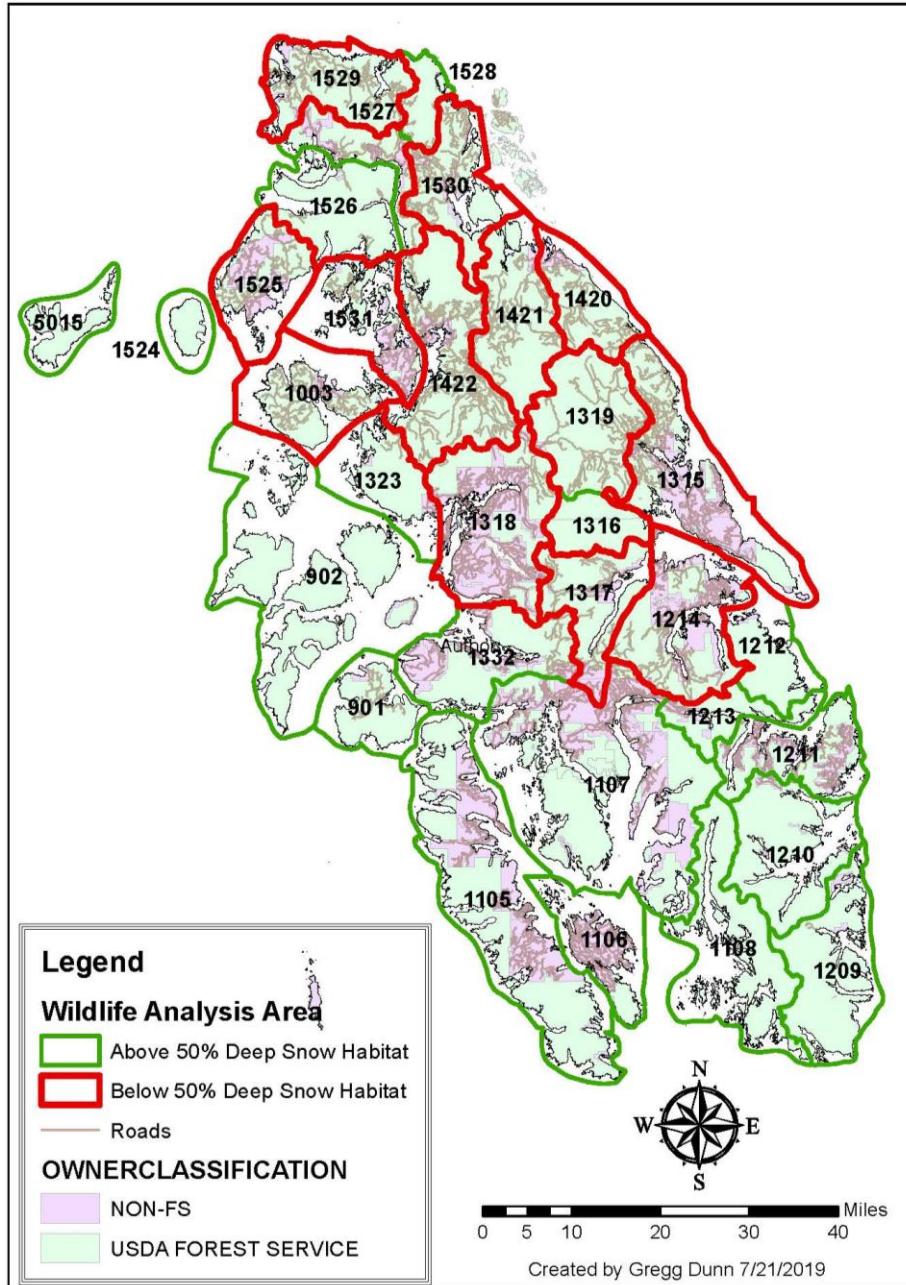
There is 62% of deer winter habitat remaining in GMU 2 (**Table 1**) with WAAs 1214, 1315, 1317, 1318, 1420, 1421, 1525, 1529, 1530, 1531 having below 50% habitat remaining. This is from past timber harvest and road building. In the case of a severe winter, these will be the areas hit hardest with deer mortality since there is little habitat left to sustain them. Habitat conditions would not improve as the areas harvested have reached stem exclusion which can last from 25 year post harvest to 150 years post-harvest. **Figure 3** can be used to see where the least amount of habitat remains and if you compare it to **Table 1** you can see where harvest is greatest compared to available habitat. Most wildlife analysis areas (WAA) with less than 50% deep snow deer winter habitat have the highest harvest rates.

Conditions on the ground within the last few years have remained stable because of mild winters and later arrival of snow in Unit 2 allowing the deer to forage longer at altitude and in areas such as muskegs. Prolonged snowpack during a severe winter or within later stages of winter could have a greater effect on deer populations going forward since there is far less habitat available during those periods.

**Table 1:** Overall percent of historical habitat since 1954 (beginning of large scale logging) remaining by wildlife analysis area (WAA) in GMU 2 for deep snow deer winter habitat and all productive old growth, average harvest since 2005, and harvest trend.

WAA	Productive Old Growth	Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)	Average Reported Harvest by WAA since 2005 and trend
901	89	85	69 ↑
902	100	100	79 ↓
1003	51	49	46 ↑
1105	99	99	84 ↑
1106	100	100	25 ↓
1107	97	93	138 ↑
1108	99	99	17 ↑
1209	100	100	10 ↑
1210	99	99	50 ↑
1211	83	78	36 ↑

<b>WAA</b>	<b>Productive Old Growth</b>	<b>Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)</b>	<b>Average Reported Harvest by WAA since 2005 and trend</b>
1213	99	99	21 ↑
1214	67	48	245 ↑
1315	55	29	350 ↑
1316	99	100	27 ↓
1317	56	23	145 ↑
1318	78	49	220 ↑
1319	74	61	229 ↓
1323	90	76	18 ↓
1332	80	72	76 →
1420	54	27	308 ↑
1421	71	44	107 ↓
1422	51	29	386 ↓
1525	51	40	21 ↑
1526	93	83	18 ↑
1527	67	61	23 ↓
1528	82	84	37 →
1529	55	46	144 ↓
1530	50	37	145 ↑
1531	55	49	37 ↓



**Figure 3:** Map of Unit 2 showing deep snow deer winter habitat availability and where habitat is below 50% in WAAs. Note: WAA 5015 is not part of Unit 2.

### Harvest History

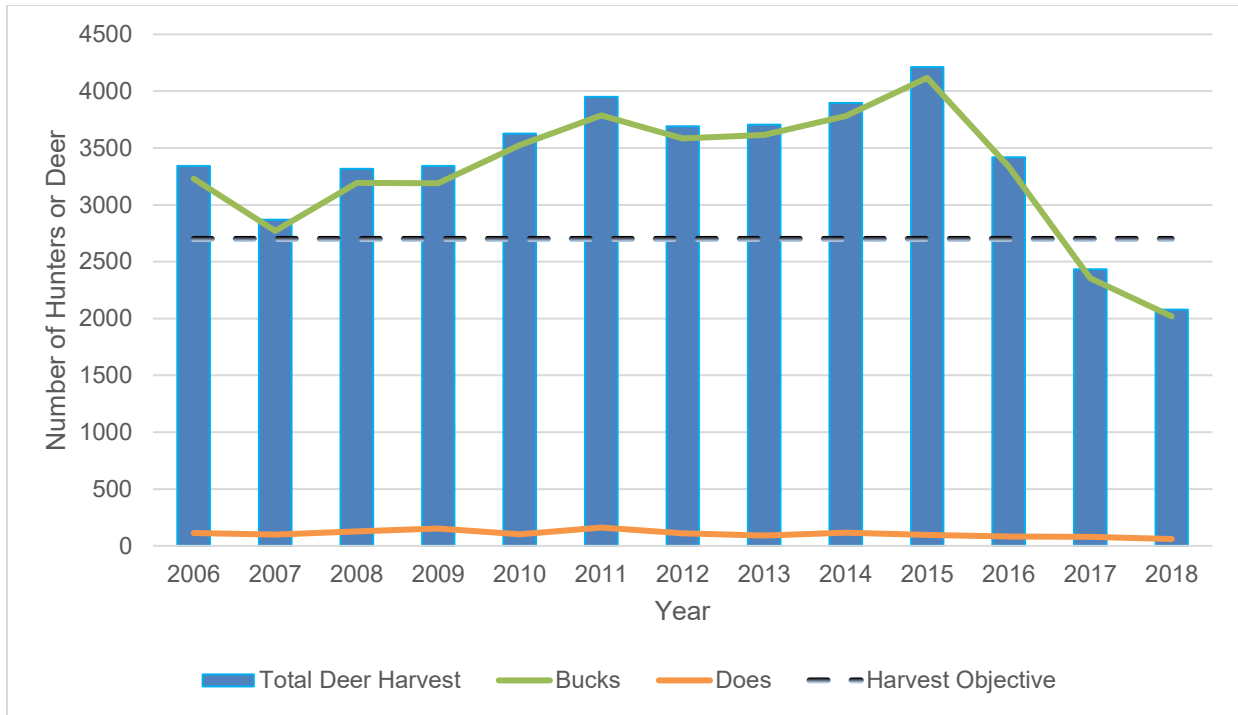
Harvest data reported below are provided by ADF&G (McCoy 2019b) and are gathered by several reporting systems including the Region 1 (Southeast Alaska) deer survey, Unit 2 deer harvest report, and the State-wide deer harvest report. The Region 1 deer survey is the most consistent report, covering the years 1997–2010 and is based on a sample of hunters. In general, 35% of hunters from each community were sampled annually and while response rates vary by community, the overall response rate across



communities was approximately 60% each year. Harvest numbers were extrapolated using expansion factors that are calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response was low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and interpreted with caution. Trends, however, should be fairly accurate, especially at larger scales. The Unit 2 deer report was in place from 2005–2010 and was instituted specifically for reporting deer harvest in Unit 2. In 2011, the statewide deer report replaced the other deer harvest reporting systems and requires reporting of harvest by all deer hunters. Different expansion factors are used for the various data sets so that total harvest estimates between years are comparable (McCoy 2013).

Action taken by the Alaska Board of Game in fall 2000 established a harvest objective of 2,700 deer for Unit 2 as they identified the population as important for satisfying high levels of human consumptive use (Bethune 2013). Estimated deer harvest in Unit 2 from 2005–2017 can be found in **Figure 2**. The estimated average total annual harvest is 3,467 deer. Harvests have been at or above ADF&G’s Unit 2 harvest objective from 2005-2015 and fell below harvest objectives 2016-2017. Deer harvest and number of hunters reached historically high levels in 2015 and then began to decline through 2017.

Prior to implementation of Federal regulations, opportunity to harvest female or antlerless deer was available under State regulations from 1955-1972. From 1973-1977, opportunity for female deer was still available; however, the harvest limit was reduced. During the 1987 season, the opportunity to harvest one female deer under State regulations was re-implemented, but did not get extended due to the unpopularity of the hunt in many local communities. Harvest data for these years are not available.



**Figure 4:** Unit 2 total deer harvest and numbers of does and bucks harvested through 2018 (McCoy 2019b)

Reported deer harvests of female deer in Unit 2 (**Table 1**) have ranged from 60 to 119 animals. While the average reported female deer harvest increased to 107 since 2005, the female deer harvest percentage has actually decreased to 3.2% of the total reported deer harvest.

**Table 1:** Female deer harvest compared to overall deer harvest, Unit 2 2005-2018 (McCoy 2019b)

Regulatory year	Female deer harvest	Total deer harvest	Percent of harvest (female)
2005	103	2642	3.9
2006	90	3105	2.9
2007	87	2795	3.1
2008	112	3222	3.5
2009	107	3145	3.4
2010	88	3428	2.6
2011	106	3746	2.8
2012	96	3696	2.6
2013	77	3677	2.1
2014	119	3931	3.0
2015	96	4243	2.3
2016	84	3534	2.4
2017	79	2433	3.2
2018	60	2079	2.9
<b>Average</b>	<b>107</b>	<b>3329</b>	<b>3.2</b>

### Other Mortality

It is believed that Unit 2 has one of the highest illegal and unreported harvest rates in the region, estimated to be equal to the legal harvest (Table 5 in Bethune 2015). That estimate is based on anecdotal reports, interviews with law enforcement personnel, and fates of radio-collared deer. If that estimate is correct, over 4% of the estimated 75,000 deer in Unit 2 may be illegally harvested each year. This high illegal take is likely due in large part to the extensive and remote road system and few law enforcement personnel patrolling the unit.

Flynn and Suring (1989) reported that actual mortality from legal hunting could be 38% greater than the estimated harvest because of unknown or unreported crippling loss. Field observations and voluntary reports of wounding loss suggest that this estimate might be conservative.

Historically and prior to extensive road paving on the island, deer/vehicle collisions were rare (10–25 deer/year) and were not considered a significant source of mortality. However, the collision risk increased with completion in 2003 of extensive new POW highway paving projects, which now extend from Craig to Coffman Cove and east to Thorne Bay. Construction and paving of the main 30 road to Coffman Cove was completed in 2008. Construction is currently underway to extend the paved surface of Road 20 to Whale Pass. Higher vehicle speeds, as well as an attractive food source created by planting grass for erosion control near the roads will likely cause more deer/vehicle collisions, prompting managers to raise estimates to 30-50 deer per year beginning in 2004.

### **Effects of the Proposal**

If the proposal is adopted, harvest opportunity for Federally qualified subsistence users will decrease. Besides prohibiting the harvest of female deer, adopting the proposal also implements an antler requirement for harvesting deer which could further decrease harvest opportunity of both yearling bucks throughout the season, as well as some mature bucks later in the season that have either dropped their antlers or lose their antlers during the act of harvesting the animal. It is not uncommon in December for antlers to separate from male deer during harvest, which could unintentionally put Federally qualified subsistence users in violation of Federal regulation. The antler requirement would result in Federal regulations being more restrictive than State regulations, contrary to the rural priority mandated by ANILCA.

Buck-only harvest may alter buck/doe ratios and the age structure of the male population. It does not reduce the reproductive potential of the population because the same number of does are still bred by remaining bucks. Hunters sometimes blame declines in the number of fawns per doe on a scarcity of bucks or a lack of mature bucks available to do the breeding. However, research has failed to support a biologically meaningful relationship; the number of bucks per 100 does is unrelated to fawn recruitment the following year (Zwank 1976, Erickson et al. 2003). Therefore, harvest management of “bucks only” has the potential to maintain a larger population available for harvest, though this is subject to limiting factors such as current and future habitat carrying capacity of Unit 2 and possible severe weather events.

Adoption of the proposal could benefit deer populations by making more deer available for reproduction. While harvest data suggests that female deer harvest is on average 3.2% of the total harvest (McCoy 2019b), the data does not indicate whether harvested male deer were antlered or not. It is believed the majority of male deer taken are antlered at time of harvest, so the number of additional male deer made unavailable is most likely very low. With such low levels of additional deer made available for reproduction, adoption of the proposal will not have any positive effects on the health of deer populations in Unit 2, as deer populations are more greatly affected by available habitat and winter weather conditions rather than harvest.

## **OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP20-04.

### **Justification**

Continued availability of the female deer season is important for maintaining harvest opportunity for Federally qualified subsistence users. During past wildlife regulatory cycles, the Board has opposed the elimination of antlerless harvest of deer in Unit 2 many times. The Board has justified this opposition as testimony has indicated the harvest of female deer is customary and traditional, and deer populations have been stable (FSB 1995, OSM 1995). Although some smaller geographical areas in Unit 2 may have slight declines, current pellet count data suggests the majority of the deer population across Unit 2 is stable, so female deer harvest does not need to be prohibited for conservation.

Implementing an antler requirement for male deer will further reduce harvest opportunity, while potentially creating unintentional violations in Unit 2. Based on current definitions of antlered and antlerless, adopting the proposal will make the harvest of any male deer without antlers illegal, and would include any male deer that loses their antlers in the act of harvest.

Reported female deer harvest is only averaging 3.2% of the overall deer harvest in Unit 2. With such low levels of harvest, adoption of the proposal will not have any positive effects on the health of deer populations in Unit 2, as deer populations are more greatly affected by available habitat and winter weather conditions rather than harvest.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		



Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_  
 Minutes Approved By: \_\_\_\_\_  
 Date: \_\_\_\_\_

## APPENDICES

## Appendix 1: Regulatory framework of State and Federal deer seasons by year since 1925

Year	Type of Season	Season	Limit	Conditions & Limitations
1925	Open	Sept 15-Dec 16	3	Buck, 3" antlers or longer
1925-1929	Open	Sept 1-Nov 30	3	Buck, 3" antlers or longer
1930-1941	Open	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Resident	Sept 16-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Non-resident	Sept 16-Nov 15	1	Buck, 3" antlers or longer
1944-1948	Resident	Sept 1-Nov 7	2	Buck, 3" antlers or longer
1944-1948	Non-resident	Sept 1-Nov 7	1	Buck, 3" antlers or longer
1949	Resident	Sept 1-Nov 15	2	Buck, 3" antlers or longer
1949	Non-resident	Sept 1-Nov 15	1	Buck, 3" antlers or longer
1950-1951	Resident	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1950-1951	Non-resident	Aug 20-Nov 15	1	Buck, 3" antlers or longer
1952	Open	Aug 20-Nov 22	2	Buck, 3" antlers or longer
1953-1954	Open	Aug 20-Nov 22	3	Buck, 3" antlers or longer
1955	Open	Aug 20-Nov 22	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 15-Nov 22
1956	Open	Aug 20-Nov 26	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 13-Nov 26
1957-1959	Open	Aug 20-Nov 30	4	4 deer, does may be taken Oct 15-Nov 30
1960	Open	Aug 20-Dec 15	4	4 deer, does may be taken Oct 15-Nov 30

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
<b>1961</b>	Open	Aug 20-Nov 30	4	4 deer, antlerless deer may be taken Sept 15-Nov 30
<b>1962</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1963-1967</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1968</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1969-1971</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1972</b>	Open	Aug 1-Dec 31	3	3 deer, antlerless deer may be taken Nov 1-Nov 30
<b>1973-1977</b>	Open	Aug 1-Nov 30	3	1 antlerless deer may be taken Nov 1-Nov 30
<b>1978-1984</b>	Open	Aug 1-Nov 30	3	Antlered deer
<b>1985-1986</b>	State General	Aug 1-Nov 30	3	Antlered deer
<b>1987</b>	State General	Aug 1-Nov 30	4	1 antlerless deer may be taken Oct 10-Oct 31
<b>1988-2018</b>	State General	Aug 1-Dec 31	4	Antlered deer/bucks
<b>1991-1994</b>	Federal Subsistence	Aug 1-Dec 31	4	Antlered deer
<b>1995-1997</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken only during Oct 15-Dec 31
<b>1998-2002</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only

Year	Type of Season	Season	Limit	Conditions & Limitations
2003-2005	Federal Subsistence	July 24-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
2006-2009	Federal Subsistence	July 24-Dec 31	5	No more than one may be an antlerless deer; antlerless deer may be taken Oct 15-Dec 31
2010-2015	Federal Subsistence	July 24-Dec 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Dec 31
2016-2018	Federal Subsistence	July 24-Jan 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Jan 31.

**Appendix 2:** History of Federal regulatory actions related to deer in Unit 2 taken by the Federal Subsistence Board

Proposal number	Reg Year	FSB action	Proposal request
P95-01	1995	Adopt w/ mod to require harvest report requirement	Create an antlerless season in Unit 2
R95-09	1995	Reject	Requested rescinding antlerless deer season created by adoption of P95-01
P97-07	1997	Reject	Reduce deer season from Aug. 1-Dec. 31 to Sept. 1-Dec. 31, and eliminate harvest of antlerless deer in Unit 2.
P98-09	1998	Reject	Eliminate antlerless season
P98-10	1998	Reject	Eliminate antlerless season and apply antler restriction of forked horn or larger
P98-11	1998	Reject	Shorten deer season from Sept 1 -Nov. 30
P98-12	1998	Reject	Eliminate antlerless season
P00-005	2000	Reject	Eliminate antlerless season

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>P00-05</b>	2000	Reject	Eliminate antlerless deer season
<b>P00-06</b>	2000	Reject	Community harvest permit request of 500 deer per Unit 2 community
<b>WP01-03</b>	2001	Reject	Eliminate antlerless deer season
<b>WP02-08</b>	2002	Reject	Request increase of deer harvest limit for Unit 2 residents and reduction for Unit 1A and 3 residents
<b>WP02-09</b>	2002	Took no action	Restrict non-Federally qualified users from hunting on Federal lands between Aug. 1-31 and Oct. 16-Nov. 14
<b>WRFR02-01</b>	2002	Reject	Requested reconsideration of the Board rejecting WP02-09 to close Federal lands in Unit 2.
<b>WP03-04</b>	2003	Adopt with modification adding one week in July at front of season (July 24-31)	Requested earlier extension of deer season for Federally qualified users
<b>WP03-05</b>	2003	Adopt with modification restricting non-Federally qualified users from Aug 1-21 on Federal Public Lands on Prince of Wales Island (closure for 1 year)	Requested closure of Federal public lands from Aug 1-Sept. 1 and reduction of harvest limit to 2 deer for non-Federally qualified subsistence users.
<b>WP04-03</b>	2004	Took no action	Requested closure be changed from Aug 1-21 to Oct. 16-Nov. 14 and reduction of harvest limit for non-Federally qualified users
<b>WP04-04</b>	2004	Took no action	Requested antlerless deer season be modified from Oct. 15-Dec. 31 to Aug. 1-Sept. 15
<b>WP04-05</b>	2004	Took no action	Requested closure to non-Federally qualified users be reduced by one week
<b>WP04-06</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-07</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-08</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP04-09</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with antler restrictions for non-Federally qualified users.
<b>WP04-10</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with a 3 buck harvest limit for non-Federally qualified users.
<b>WP04-11</b>	2004	Took no action	Requested removal of the July 24 start date for subsistence users and to modify closure from Aug. 1-21 to Oct. 16-Dec. 31 and implement a 2 buck harvest limit for non-Federally qualified users.
<b>WP04-12</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-Jan. 31 for subsistence users and modified the August closure to the month of January to all but Unit 2 residents
<b>WP04-13</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-10 and removing the antlerless deer season for subsistence users and reducing the August closure from Aug. 1-10 for non-Federally qualified users.
<b>WP04-14</b>	2004	Took no action	Reduce deer season from July24-Dec. 31 to Aug. 1-Dec. 31for Federally qualified users in Unit 2.
<b>WP04-15</b>	2004	Adopt with modification restricting non-Federally qualified users from Aug 1-15 on Federal Public Lands on Prince of Wales Island	Requested continuation of the one year closure as passed by the FSB during the 2003 regulatory cycle.
<b>WP05-04</b>	2005	Adopt with modification removing registration requirement, but required use of a joint State/Federal harvest report as recommended by the Unit 2 Deer Subcommittee	Requested that all hunters obtain a Federal registration permit to hunt deer in Unit 2.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP06-06</b>	2006	Reject	Requested removing sequential use of harvest tickets and possession of all unused harvest ticket requirements.
<b>WP06-07</b>	2006	Took no action	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-08</b>	2006	Adopt with modification. Modifications included: 1) removal of the August closure on SE portion of Prince of Wales Island; 2) rejected closure to non-Federally qualified users on Suemez Island; and 3) rejected a closure to non-Federally qualified users on the islands located along the SW coast of Prince of Wales Island.	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-09</b>	2006	Adopt with modification. The Board modified the Council recommendation by eliminating the need to have a Federal permit for harvesting a 5th deer. The Board also delegated the Forest Supervisor the ability to lower the harvest limit to 4 deer if needed.	Requested increasing the deer harvest limit to 6 deer.
<b>WP06-10</b>	2006	Reject	Requested use of harvest ticket #1 to record harvest of a female deer.
<b>WP07-07</b>	2007	Reject	Requested either elimination of antlerless deer hunt or to only allow for antlerless deer harvest every other year.
<b>WP10-19</b>	2010	Reject	Requested modification of female deer season from Oct. 15-Dec. 31 to Sept. 15-Oct. 15
<b>WP10-20</b>	2010	Reject	Requested modification of the non-Federally qualified closure from Aug. 1-15 to July 24-31.
<b>WSA11-01</b>	2011	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP12-08</b>	2012	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP14-03</b>	2014	Reject	Eliminate antlerless deer season
<b>WP14-04</b>	2014	Reject	Request early start date for Federally qualified users over 60 or disabled.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP16-01</b>	2016	Adopt with mod adding January season, but rejected non-qualified harvest reduction	Requested non-Federally qualified users be restricted to two deer and extension season closing date from Dec. 31 to Jan. 31
<b>WP16-05</b>	2016	Adopted	Requests the language stating the Unit 2 deer harvest limit may be reduced to four deer in times of conservation be removed
<b>WP16-08</b>	2016	Adopted	Requests deer harvest ticket #5 be validated out of sequence to record female deer taken in Unit 2.
<b>WP18-01</b>	2018	Adopt w/ mod to accept harvest limit restriction but oppose season reduction	Limit harvest to two deer from Federal public lands the reduce season by one week or more for non-Federally qualified subsistence users
<b>WP18-02</b>	2018	Adopted	Requested modification of deer C&T for Units 1-5 to all rural residents of Units 1-5.



<b>WP20–05 Executive Summary</b>	
<b>General Description</b>	Proposal WP20–05 requests that female deer harvest in Unit 2 occur under a Federal registration permit. <i>Submitted by: East Prince of Wales Advisory Committee.</i>
<b>Proposed Regulation</b>	<p><b>Unit 2—Deer</b></p> <p><i>5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. A registration permit is required to take a female deer. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.</i></p> <p><i>The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Support</b>

## DRAFT STAFF ANALYSIS WP20-05

### ISSUES

Wildlife Proposal WP20-05, submitted by the East Prince of Wales Fish and Game Advisory Committee, requests the female deer harvest in Unit 2 occur under a Federal registration permit.

### DISCUSSION

The proponent believes that this regulation change is necessary because the harvest of female deer in Unit 2 is under reported and biologists are not getting factual information. They indicated that during a previous Federal subsistence regulatory cycle, a Prince of Wales village community leader testified “*they knew over 100 female deer had been harvested in their community the previous year,*” while Alaska Department of Fish and Game (ADF&G) surveys only estimated a harvest of 18 bucks and no does harvested by community members during that same year.

The proponent believes a registration permit will allow biologists to better manage the deer population in Unit 2 and that it will clarify the regulations for subsistence users so they will not unknowingly violate State laws. The proponent believes that most Federally qualified subsistence users in Unit 2 are unaware of Federal subsistence regulations and some often harvest from State or private lands in Unit 2. A registration permit should help educate Federally qualified subsistence users on Federal regulations, while also gathering harvest data for biologists to properly manage the deer in the unit.

### Existing Federal Regulation

#### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.*

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## Proposed Federal Regulation

### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. A **registration permit is required to take a female deer.** ~~Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.~~ July 24-Jan. 31*

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## Existing State Regulation

### Unit 2 – Deer

*Residents and non-residents: Four bucks Aug. 1 – Dec. 31*

*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.*

## Extent of Federal Public Lands/Waters

Unit 2 is comprised of 74% Federal public lands and consist of 73% U.S. Forest Service (USFS) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit Map**).

## Customary and Traditional Use Determinations

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

## Regulatory History

Hunting regulations have permitted the harvest of deer in Unit 2 since 1925 (**Appendix 1**). During this period, season closing dates have varied between November and December, with December 31 being the most common closing date since 1988. Seasons and harvest limits for Federally qualified subsistence

users in Unit 2 are more liberal than State regulations. Federal regulations have allowed the harvest of one female deer in Unit 2 since 1995, as well as the harvest of five deer beginning in 2006.

Following years of numerous Unit 2 related deer proposals (**Appendix 2**) submitted to the Federal Subsistence Board (Board), the Unit 2 Deer Planning Subcommittee (Subcommittee) was formed in 2004 to address contentious deer management issues in Unit 2. At the request of the Board, the Council established the 12-member Subcommittee to address concerns that Federally qualified subsistence users in Unit 2 were unable to harvest enough deer to meet their needs. The Subcommittee included residents of Craig, Hydaburg, Ketchikan, Petersburg, Point Baker, and Wrangell, to reflect the range of users of Unit 2 deer, along with representatives from State and Federal wildlife management agencies.

The Subcommittee developed management recommendations at a series of five public meetings held in communities that depend upon Unit 2 deer. Both Federally and non-Federally qualified users participated at these meetings. The Subcommittee recommended that deer harvest management tools could be applied in Unit 2 as deer population trends and hunting use patterns changed. The degree to which these tools would be employed would be decided through the established public regulatory processes (SEASRAC 2006).

In 2006, the Board implemented two major changes to the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09, both with modification. Adoption of WP06-08 as modified, reopened a portion of Federal public lands to non-Federally qualified users on the southeast side of Prince of Wales Island. Adoption of WP06-09 as modified, established the current five deer harvest limit for Federally qualified subsistence users (FSB 2006). Two other proposals, WP06-06 and WP06-10, related to the use of harvest tickets in Unit 2 and were unanimously opposed by the Council and rejected by the Board (FSB 2006).

Three proposals related to Unit 2 deer were submitted from 2007-2012. Proposal WP07-07 requested the female deer season be closed, Proposal WP10-19 requested a change to the female deer season, and Proposal WP10-20 requested the August closure to non-Federally qualified users be lifted. The Council opposed and the Board rejected these proposals (FSB 2007, 2010).

Also during 2010, the Board adopted WP10-22 with modification delegating management authority for wildlife by letter to the ten District Rangers located in Units 1-5. As a result, the delegated authority in Unit 2 changed from the Tongass Forest Supervisor to the District Rangers of both the Craig and Thorne Bay Ranger Districts. For deer, their scope of delegation allows them to set harvest quotas; to close, reopen or adjust Federal subsistence deer seasons; and to adjust harvest and possession limits for that species. Most likely, this type of action would occur prior to the season. Any action greater than 60 days in length requires a public hearing before implementation. They may also close Federal Public lands to the take of this species to all users. This type of action would most likely take place during the season. Action on the proposal also removed the requirement for consultation with the both Council Chair and ADF&G, as this was already defined protocol within the Special Action process (FSB 2010).

Two proposals were considered for deer in Unit 2 in 2013. Proposal WP14-03 requested the female deer season be eliminated whereas Proposal WP14-04 asked for an earlier season to be established for

Federally qualified subsistence users over the age of 60 or physically disabled. The Council unanimously opposed and the Board rejected these proposals (SEASRAC 2013; FSB 2014).

Three proposals were considered for deer in Unit 2 in 2015. Proposal WP16-01 requested a harvest limit reduction for non-Federally qualified users as well as an extension of the Federal season through the month of January. This proposal was broken into two sub-proposals by the Council who opposed the harvest limit reduction but supported the season extension with the following justifications: 1) the Unit 2 deer population was stable; 2) January harvest was a traditional practice according to testimony; 3) any additional female deer harvest was believed to be minimal and sustainable; and 4) the USFS District Ranger in Unit 2 has delegated authority to close the season early if conservation needs arise. The Board adopted the proposal as modified by the Council. Proposal WP16-05 requested removal of language regarding a harvest limit reduction during times of conservation because that authority is included by delegation to the Federal in-season manager and WP16-08 requested harvest ticket #5 be used out of sequence when harvesting a female deer. Both proposals were unanimously supported by the Council and adopted by the Board (SEASRAC 2015; FSB 2016).

Proposal WP18-01 was considered during the 2018 regulatory cycle. The proposal requested a reduction of both the season length and the harvest limit for non-Federally qualified users. The Council divided the proposal into two action items where they supported the harvest limit reduction but opposed the shortening of the season. The Board adopted the harvest limit reduction as recommended by the Council based on testimony from Federally qualified subsistence users that they were not meeting their needs. The Board rejected the season date reduction because they believed it would not provide additional benefits as harvests in December were minimal by both user groups and that subsistence users already had additional priorities available in the form of; the week in July, the closure to non-Federally qualified users in August, the ability to harvest a female deer starting October 15, a season extension into the month of January and the ability to harvest up to five deer total (SEASRAC 2017; FSB 2018a).

Due to administrative delays in the Federal Rule Making Process, on August 8, 2018, the Board approved temporary delegated authority to some Federal land managers to enact temporary changes to Federal Subsistence Regulations adopted by the Board during the April 2018 regulatory meeting (FSB 2018b). This delegation of authority was established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6). As a result, emergency special action 13-BD-06-18 was issued on August 16, 2018 by the USFS District Ranger restricting the harvest of deer by non-Federally qualified users to two male deer on Federal Public lands in Unit 2. The action was set to expire on October 15, 2018 or when the 2018-2020 Federal Subsistence Wildlife Regulations were published in the Federal Register.

Proposal WP18-02, requesting the Customary and Traditional use determination for deer in Units 1-5 be modified to include all rural residents of Units 1-5, was also considered during the 2018 regulatory cycle. This proposal had unanimous support from the Council and was adopted by the Board as a consensus agenda item (SEASRAC 2017; FSB 2018a).

## **Current Events Involving the Species**

The proponent also submitted Proposals WP20-03, -04, -06, and -07 regarding deer in Unit 2. The proponent was contacted to clarify the intent and reasoning of each proposal. The proponent stated their overall intent was to provide the Board with a suite of management options to increase the deer population and hunter success in Unit 2. Additionally, WP20-02 was submitted by ADF&G, requesting removal of the harvest limit reduction for non-Federally qualified users.

## **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation on steep slopes where there is less snow accumulation, and old-growth forests provide increased intermixing of snow-intercept and foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet energetic needs of lactating does. Some deer migrate and follow the greening vegetation up to alpine for the summer, while others remain at lower elevations. The breeding season, or rut, generally occurs late October through late November (ADF&G 2009) generally peaking around mid-November. Wolves and black bears are the primary predators present in Unit 2, and may reduce deer populations or increase recovery times after severe winters.

Deer populations in Southeast Alaska fluctuate and are primarily influenced by winter snow depths (Olson 1979). Deer in Southeast Alaska typically have trouble meeting their energy needs in winter (Hanley and McKendrick 1985, Parker et al. 1999), and winters with long periods of deep snow that restrict the availability of forage can result in deer depleting their energy reserves to the point of starvation (Olson 1979).

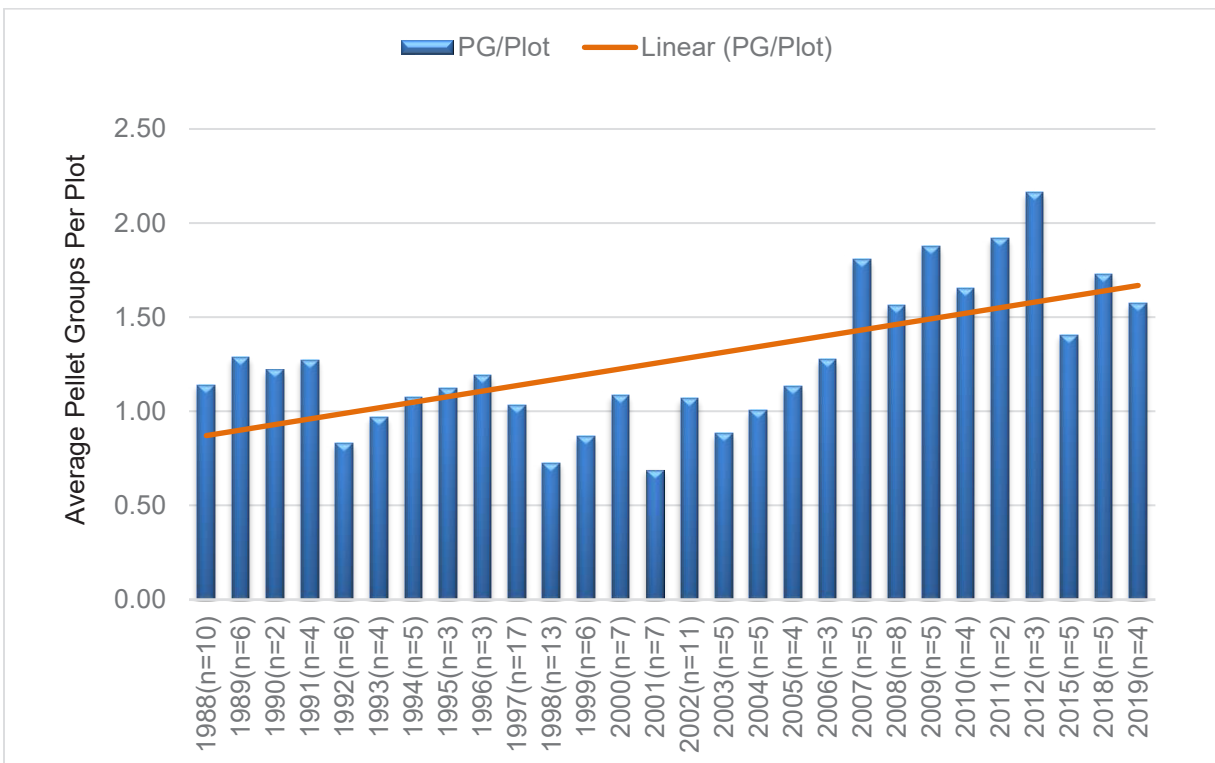
Summer nutrition is important for building body reserves to sustain deer through the winter (Stewart et al. 2005). Few studies have been conducted on summer habitat conditions because winter habitat carrying capacity is generally considered to be the limiting factor for deer in Southeast Alaska. However, deer populations at or above habitat carrying capacity are affected by intra-specific competition for food and may enter winter in reduced body condition compared to deer populations below carrying capacity (Kie et al. 2003, Stewart et al. 2005). This can result in higher susceptibility to severe winters and lower productivity (Kie et al. 2003, Stewart et al. 2005). In addition, nutritionally stressed does produce smaller and fewer fawns (Olson 1979).

## **Recent population indices**

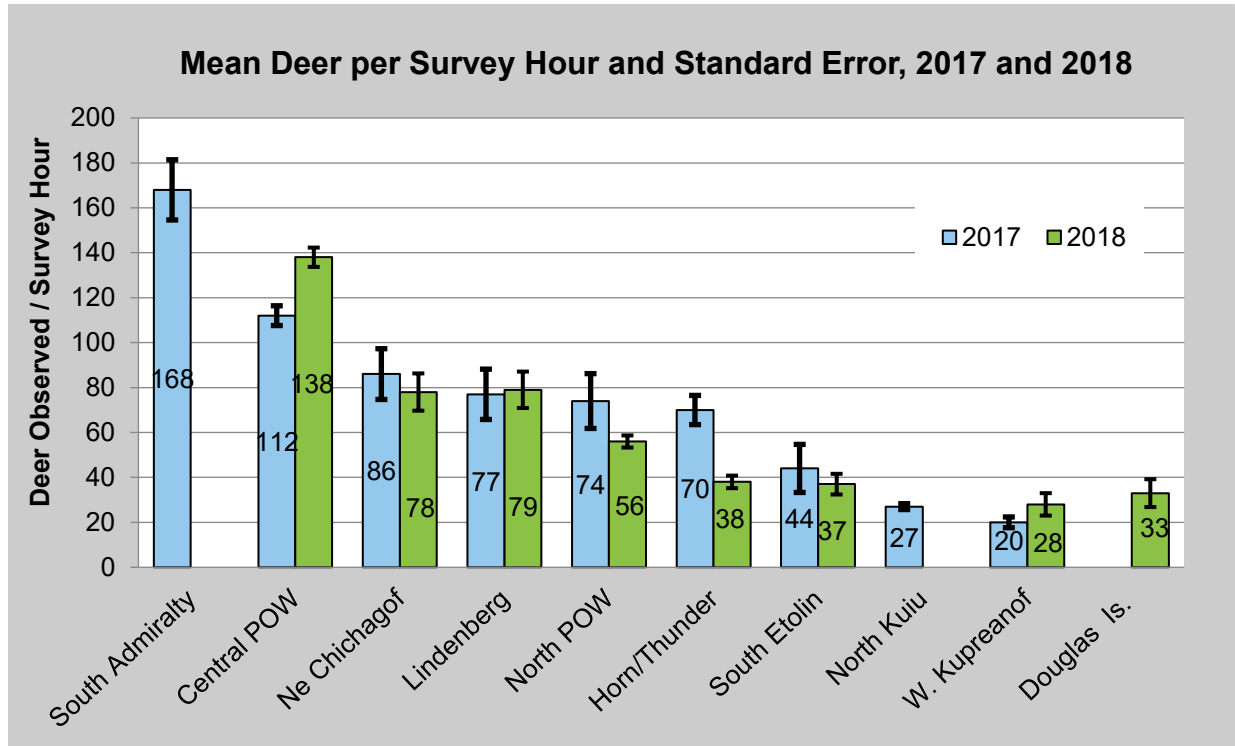
There are no methods to directly count deer in Southeast Alaska, so ADF&G conducts deer pellet surveys as an index to the relative abundance of the deer population. Relating pellet group data to population levels is difficult, however, because factors other than changes in deer population size can affect deer pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same zones each year. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer (McCoy 2011).

Brinkman et al. (2013) questioned the value of pellet-group surveys for monitoring population trends due to the variability in the data compared to DNA based pellet counts. Pellet group transects were designed to detect large (>30%) changes in abundance and are not an appropriate tool for monitoring smaller year to year changes. Although pellet-group surveys remain the only widely available deer population data, the results should be interpreted with caution. Pellet-group data in Unit 2 suggests a generally increasing population trend since a low during the late 1990s and early 2000s (**Figure 1**). This contrasts with Brinkman et al. (2011) who used a DNA based technique and estimated a 30% population decrease from 2006–2008 which they attributed to three consecutive winters with deep snow. Brinkman's study was limited to three watersheds, and the population changes during the study varied by watershed. It appears that populations subsequently increased after those severe winters and Bethune (2011) felt that by 2010 the Unit 2 deer population was healthy, stable to increasing, and at a 12-15 year high.

ADF&G began testing alpine deer aerial survey techniques in 2013 (**Figure 2**). 2017 was the first year with an established protocol and consistent surveys across southeast Alaska. ADF&G is still researching the correlation between alpine surveys and actual deer populations. Aerial survey numbers seem to reflect the relative abundances expected among various locations, but correlations with population trends are unknown at this time.



**Figure 1:** Annual average pellet group counts and general trend for deer in Unit 2 through 2019 (McCoy 2019a).



**Figure 2:** Aerial alpine surveys across southeast Alaska for 2017 and 2018 (McCoy 2019b).

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 and intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Deep snow deer winter range is defined as high value productive old growth (size class 5, 6, 7) on south facing slopes below 800 feet, and this is considered to be the limiting habitat for deer in Southeast Alaska. Some areas of Unit 2 have been impacted by large scale changes in habitat due to timber harvest, while the habitat is largely intact in other areas. Young-growth forest treatments (e.g., thinning, small gap creation, branch pruning) can benefit deer forage development in previously harvested stands. Regardless, areas with substantial timber harvest are expected to have lower long-term carrying capacity compared to pre-harvest conditions.

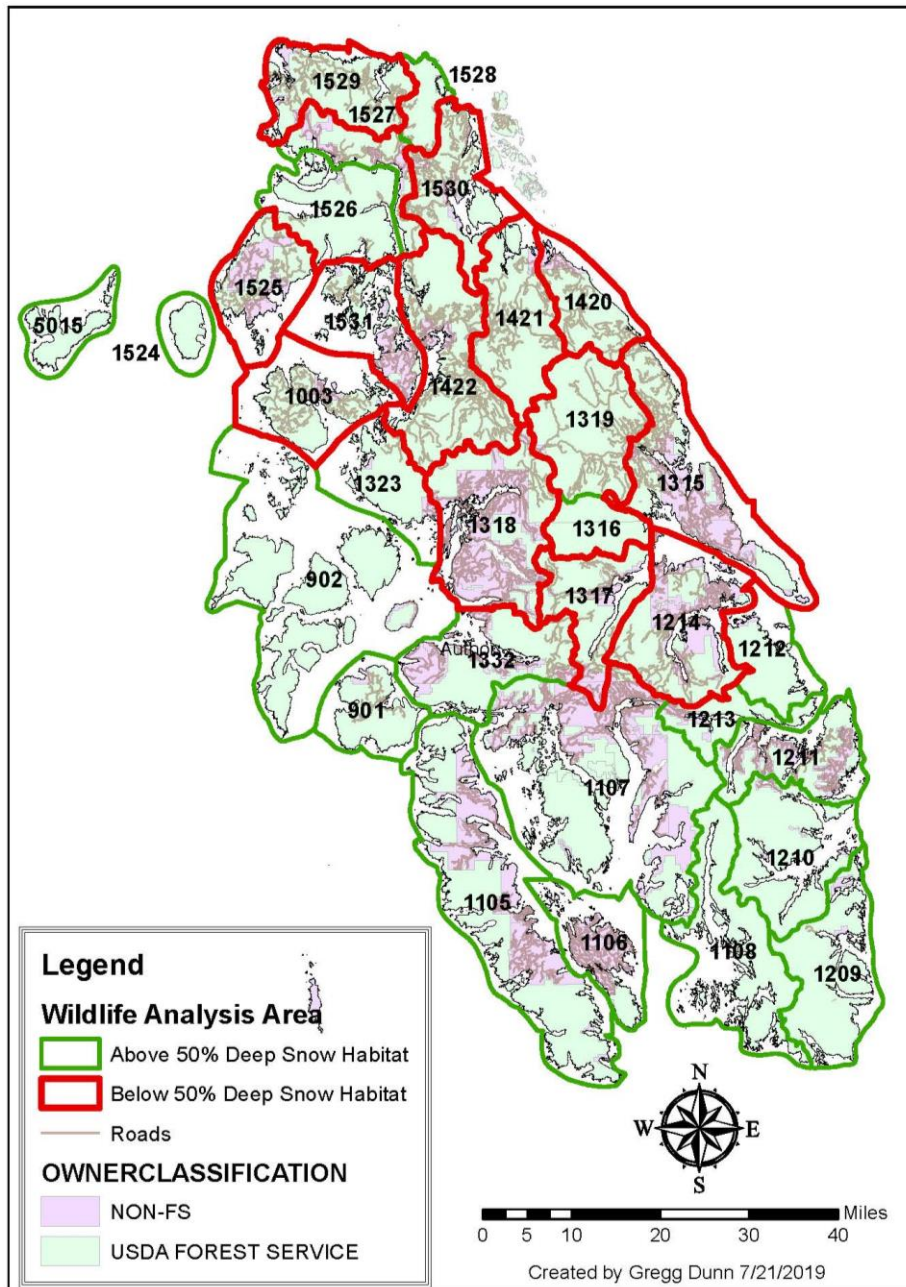
There is 62% of deer winter habitat remaining in GMU 2 (**Table 1**) with WAAs 1214, 1315, 1317, 1318, 1420, 1421, 1525, 1529, 1530, 1531 having below 50% habitat remaining. This is from past timber harvest and road building. In the case of a severe winter, these will be the areas hit hardest with deer mortality since there is little habitat left to sustain them. Habitat conditions would not improve as the areas harvested have reached stem exclusion which can last from 25 year post harvest to 150 years post-harvest. **Figure 3** can be used to see where the least amount of habitat remains and if you compare it to **Table 1** you can see where harvest is greatest compared to available habitat. Most wildlife analysis areas (WAA) with less than 50% deep snow deer winter habitat have the highest harvest rates.



Conditions on the ground within the last few years have remained stable because of mild winters and later arrival of snow in Unit 2 allowing the deer to forage longer at altitude and in areas such as muskegs. Prolonged snowpack during a severe winter or within later stages of winter could have a greater effect on deer populations going forward since there is far less habitat available during those periods.

**Table 1:** Overall percent of historical habitat since 1954 (beginning of large scale logging) remaining by wildlife analysis area (WAA) in GMU 2 for deep snow deer winter habitat and all productive old growth, average harvest since 2005, and harvest trend.

WAA	Productive Old Growth	Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)	Average Reported Harvest by WAA since 2005 and trend
901	89	85	69 ↑
902	100	100	79 ↓
1003	51	49	46 ↑
1105	99	99	84 ↑
1106	100	100	25 ↓
1107	97	93	138 ↑
1108	99	99	17 ↑
1209	100	100	10 ↑
1210	99	99	50 ↑
1211	83	78	36 ↑
1213	99	99	21 ↑
1214	67	48	245 ↑
1315	55	29	350 ↑
1316	99	100	27 ↓
1317	56	23	145 ↑
1318	78	49	220 ↑
1319	74	61	229 ↓
1323	90	76	18 ↓
1332	80	72	76 →
1420	54	27	308 ↑
1421	71	44	107 ↓
1422	51	29	386 ↓
1525	51	40	21 ↑
1526	93	83	18 ↑
1527	67	61	23 ↓
1528	82	84	37 →
1529	55	46	144 ↓
1530	50	37	145 ↑
1531	55	49	37 ↓



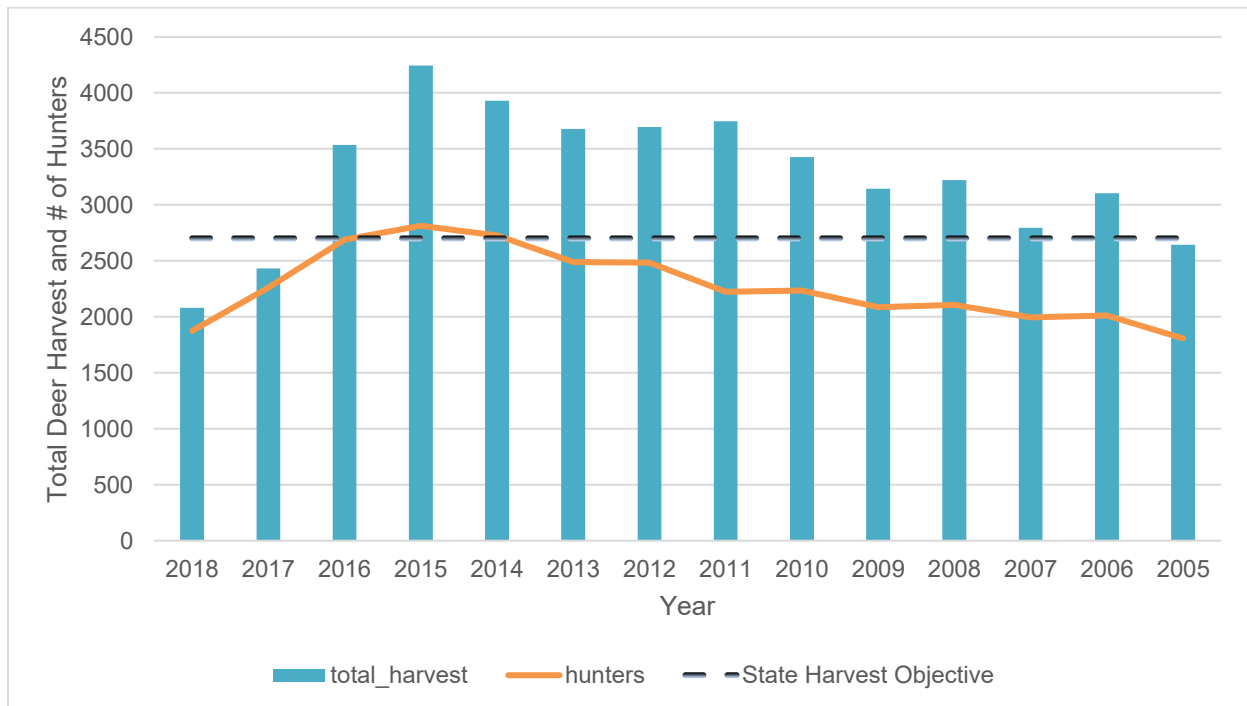
**Figure 3:** Map of Unit 2 showing deep snow deer winter habitat availability and where habitat is below 50% in WAAs. Note: WAA 5015 is not part of Unit 2.

### Harvest History

Harvest data reported below are provided by ADF&G (McCoy 2019b) and are gathered by several reporting systems including the Region 1 deer survey, Unit 2 deer harvest report, and the State-wide deer harvest report. The Region 1 deer survey is the most consistent report, covering the years 1997–2010 and is based on a sample of hunters. In general, 35% of hunters from each community were sampled annually

and while response rates vary by community, the overall response rate across communities was approximately 60% each year. Harvest numbers were extrapolated using expansion factors that are calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response was low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and interpreted with caution. Trends, however, should be fairly accurate especially at larger scales. The Unit 2 deer report was in place from 2005–2010 and was instituted specifically for reporting deer harvest in Unit 2. In 2011, the statewide deer report replaced the other deer harvest reporting systems and requires reporting of harvest by all deer hunters. Different expansion factors are used for the various data sets so that total harvest estimates between years are comparable (McCoy 2013).

Action taken by the Alaska Board of Game in fall 2000 established a harvest objective of 2,700 deer for Unit 2 as they identified the population as important for satisfying high levels of human consumptive use (Bethune 2013). Estimated deer harvest in Unit 2 from 2005–2018 can be found in **Figure 4**. The estimated average total annual harvest is 3,467 deer. Harvests have been at or above ADF&G’s Unit 2 harvest objective from 2005-2016 and fell below harvest objectives during the 2017 and 2018 seasons. Deer harvest reached historically high levels in 2015 and then began to decline since. The same pattern can also be seen with hunter numbers participating in Unit 2 (**Figure 4**).



**Figure 4:** Total deer harvest and number of hunters during the 2005-2018 seasons in Unit 2 and showing the state harvest objective of 2,700 deer (McCoy 2019b).

Prior to implementation of Federal regulations, opportunity to harvest female or antlerless deer was available under State regulations from 1955-1972. From 1973-1977, opportunity for female deer was still

available, however, the harvest limit was reduced. During the 1987 season, the opportunity to harvest one female deer under State regulations was re-implemented, but did not get extended due to the unpopularity of the hunt in many local communities. Harvest data for these years are not available.

Although Federal regulations for hunting deer in Unit 2 started in 1991, the opportunity to harvest female or antlerless deer was not allowed until the 1995 season. Between 1998 and 2005, a Federal permit was required, however this requirement was removed with the establishment of first a unit-wide, then statewide harvest report attached to the deer harvest tickets. From 2001-2018, the reported female deer harvest in Unit 2 (**Table 1**) has ranged from 57 to 119 animals per year, with an overall annual average of 88 female deer. During this same period, the harvest of female deer has averaged only 3% of the total deer harvest (OSM 2019; McCoy 2019b). More recently, although the average reported female deer harvest increased to 101 since 2005, the female deer harvest percentage has actually decreased to 2.9% of the total reported deer harvest (McCoy 2019b).

**Table 2:** Female deer harvest compared to overall deer harvest, Unit 2 2001-2018 (McCoy 2019b)

Regulatory year	Female deer harvest	Total deer harvest	Percent of harvest (female)
2001	109	2775	3.9
2002	57	2054	2.8
2003	56	1747	3.2
2004	63	2008	3.1
2005	103	2642	3.9
2006	90	3105	2.9
2007	87	2795	3.1
2008	112	3222	3.5
2009	107	3145	3.4
2010	88	3428	2.6
2011	106	3746	2.8
2012	96	3696	2.6
2013	77	3677	2.1
2014	119	3931	3.0
2015	96	4243	2.3
2016	84	3534	2.4
2017	79	2433	3.2
2018	60	2079	2.9
<b>Average</b>	<b>88</b>	<b>3014</b>	<b>3.0</b>

### Effects of the Proposal

If adopted, this proposal would require Federally qualified subsistence users to obtain a Federal registration permit before harvesting a female deer on Federal public lands in Unit 2. This requirement creates an unnecessary burden for subsistence users and contradicts past Board actions to simplify reporting requirements.

Adoption of the proposal could create confusion for Federally qualified subsistence users when reporting deer harvest. Currently, all deer harvest in the State is reported through the deer harvest report which is attached to deer harvest tickets at time of issuance. The State harvest report has been successful in providing harvest estimates for managers. Requirement of a registration permit may create dual reporting resulting in incorrect estimates for managing harvest, as well as misalignment of State and Federal regulations increasing regulatory complexity and user confusion.

Law enforcement personnel and State and Federal managers know that illegal harvest of female deer occurs. While adoption of the proposal may make enforcement of female deer harvest easier for law enforcement, switching to a registration permit will not prevent illegal harvest.

Adoption of the proposal will not have any positive effects on the health of deer populations in Unit 2, as deer populations are more greatly affected by available habitat and winter weather conditions rather than harvest. As such, requiring a registration permit strictly to harvest a female deer does not appear necessary for conservation of the resource.

The proposal does not affect State hunting regulation or harvests occurring on State and private lands, as State regulations do not allow for harvest of female deer in Unit 2.

## **OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP20-05.

### **Justification**

Harvest of female deer in Unit 2 has averaged 3% of the total deer harvest from 2001-2017. With this low harvest of female deer, burdening Federally qualified subsistence users with a registration permit requirement is unnecessary. Implementation of a Federal permit is not likely to improve the reporting of female deer harvest beyond the current harvest reporting system and is unnecessary for conservation of deer in Unit 2 since deer populations in the unit are more greatly affected by habitat and winter weather conditions than by harvest.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order: 5:40pm by Matt Allen, Secretary**
- II. **Roll Call: 8 voting members present, 1 via phone**  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC: 8**  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room



Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDICES

## Appendix 1: Regulatory framework of State and Federal deer seasons by year since 1925

Year	Type of Season	Season	Limit	Conditions & Limitations
1925	Open	Sept 15-Dec 16	3	Buck, 3" antlers or longer
1925-1929	Open	Sept 1-Nov 30	3	Buck, 3" antlers or longer
1930-1941	Open	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Resident	Sept 16-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Non-resident	Sept 16-Nov 15	1	Buck, 3" antlers or longer
1944-1948	Resident	Sept 1-Nov 7	2	Buck, 3" antlers or longer
1944-1948	Non-resident	Sept 1-Nov 7	1	Buck, 3" antlers or longer
1949	Resident	Sept 1-Nov 15	2	Buck, 3" antlers or longer
1949	Non-resident	Sept 1-Nov 15	1	Buck, 3" antlers or longer
1950-1951	Resident	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1950-1951	Non-resident	Aug 20-Nov 15	1	Buck, 3" antlers or longer
1952	Open	Aug 20-Nov 22	2	Buck, 3" antlers or longer
1953-1954	Open	Aug 20-Nov 22	3	Buck, 3" antlers or longer
1955	Open	Aug 20-Nov 22	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 15-Nov 22
1956	Open	Aug 20-Nov 26	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 13-Nov 26
1957-1959	Open	Aug 20-Nov 30	4	4 deer, does may be taken Oct 15-Nov 30
1960	Open	Aug 20-Dec 15	4	4 deer, does may be taken Oct 15-Nov 30
1961	Open	Aug 20-Nov 30	4	4 deer, antlerless deer may be taken Sept 15-Nov 30

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
<b>1962</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1963-1967</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1968</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1969-1971</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1972</b>	Open	Aug 1-Dec 31	3	3 deer, antlerless deer may be taken Nov 1-Nov 30
<b>1973-1977</b>	Open	Aug 1-Nov 30	3	1 antlerless deer may be taken Nov 1-Nov 30
<b>1978-1984</b>	Open	Aug 1-Nov 30	3	Antlered deer
<b>1985-1986</b>	State General	Aug 1-Nov 30	3	Antlered deer
<b>1987</b>	State General	Aug 1-Nov 30	4	1 antlerless deer may be taken Oct 10-Oct 31
<b>1988-2018</b>	State General	Aug 1-Dec 31	4	Antlered deer/bucks
<b>1991-1994</b>	Federal Subsistence	Aug 1-Dec 31	4	Antlered deer
<b>1995-1997</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken only during Oct 15-Dec 31
<b>1998-2002</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2003-2005</b>	Federal Subsistence	July 24-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2006-2009</b>	Federal Subsistence	July 24-Dec 31	5	No more than one may be an antlerless deer; antlerless deer may be taken Oct 15-Dec 31

Year	Type of Season	Season	Limit	Conditions & Limitations
2010-2015	Federal Subsistence	July 24-Dec 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Dec 31
2016-2018	Federal Subsistence	July 24-Jan 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Jan 31.

**Appendix 2:** History of Federal regulatory actions related to deer in Unit 2 taken by the Federal Subsistence Board

Proposal number	Reg Year	FSB action	Proposal request
P95-01	1995	Adopt w/ mod to require harvest report requirement	Create an antlerless season in Unit 2
R95-09	1995	Reject	Requested rescinding antlerless deer season created by adoption of P95-01
P97-07	1997	Reject	Reduce deer season from Aug. 1-Dec. 31 to Sept. 1-Dec. 31, and eliminate harvest of antlerless deer in Unit 2.
P98-09	1998	Reject	Eliminate antlerless season
P98-10	1998	Reject	Eliminate antlerless season and apply antler restriction of forked horn or larger
P98-11	1998	Reject	Shorten deer season from Sept 1 -Nov. 30
P98-12	1998	Reject	Eliminate antlerless season
P00-005	2000	Reject	Eliminate antlerless season
P00-05	2000	Reject	Eliminate antlerless deer season
P00-06	2000	Reject	Community harvest permit request of 500 deer per Unit 2 community
WP01-03	2001	Reject	Eliminate antlerless deer season
WP02-08	2002	Reject	Request increase of deer harvest limit for Unit 2 residents and reduction for Unit 1A and 3 residents
WP02-09	2002	Took no action	Restrict non-Federally qualified users from hunting on Federal lands between Aug. 1-31 and Oct. 16-Nov. 14
WRFR02-01	2002	Reject	Requested reconsideration of the Board rejecting WP02-09 to close Federal lands in Unit 2.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP03-04</b>	2003	Adopt with modification adding one week in July at front of season (July 24-31)	Requested earlier extension of deer season for Federally qualified users
<b>WP03-05</b>	2003	Adopt with modification restricting non-Federally qualified users from Aug 1-21 on Federal Public Lands on Prince of Wales Island (closure for 1 year)	Requested closure of Federal public lands from Aug 1-Sept. 1 and reduction of harvest limit to 2 deer for non-Federally qualified subsistence users.
<b>WP04-03</b>	2004	Took no action	Requested closure be changed from Aug 1-21 to Oct. 16-Nov. 14 and reduction of harvest limit for non-Federally qualified users
<b>WP04-04</b>	2004	Took no action	Requested antlerless deer season be modified from Oct. 15-Dec. 31 to Aug. 1-Sept. 15
<b>WP04-05</b>	2004	Took no action	Requested closure to non-Federally qualified users be reduced by one week
<b>WP04-06</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-07</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-08</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-09</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with antler restrictions for non-Federally qualified users.
<b>WP04-10</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with a 3 buck harvest limit for non-Federally qualified users.
<b>WP04-11</b>	2004	Took no action	Requested removal of the July 24 start date for subsistence users and to modify closure from Aug. 1-21 to Oct. 16-Dec. 31 and implement a 2 buck harvest limit for non-Federally qualified users.
<b>WP04-12</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-Jan. 31 for subsistence users and modified the August closure to the month of January to all but Unit 2 residents

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP04-13</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-10 and removing the antlerless deer season for subsistence users and reducing the August closure from Aug. 1-10 for non-Federally qualified users.
<b>WP04-14</b>	2004	Took no action	Reduce deer season from July 24-Dec. 31 to Aug. 1-Dec. 31 for Federally qualified users in Unit 2.
<b>WP04-15</b>	2004	Adopt with modification restricting non-Federally qualified users from Aug 1-15 on Federal Public Lands on Prince of Wales Island	Requested continuation of the one year closure as passed by the FSB during the 2003 regulatory cycle.
<b>WP05-04</b>	2005	Adopt with modification removing registration requirement, but required use of a joint State/Federal harvest report as recommended by the Unit 2 Deer Subcommittee	Requested that all hunters obtain a Federal registration permit to hunt deer in Unit 2.
<b>WP06-06</b>	2006	Reject	Requested removing sequential use of harvest tickets and possession of all unused harvest ticket requirements.
<b>WP06-07</b>	2006	Took no action	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-08</b>	2006	Adopt with modification. Modifications included: 1) removal of the August closure on SE portion of Prince of Wales Island; 2) rejected closure to non-Federally qualified users on Suemez Island; and 3) rejected a closure to non-Federally qualified users on the islands located along the SW coast of Prince of Wales Island.	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-09</b>	2006	Adopt with modification. The Board modified the Council recommendation by eliminating the need to have a Federal permit for harvesting a 5th deer. The Board also delegated the Forest Supervisor the ability to lower the harvest limit to 4 deer if needed.	Requested increasing the deer harvest limit to 6 deer.
<b>WP06-10</b>	2006	Reject	Requested use of harvest ticket #1 to record harvest of a female deer.
<b>WP07-07</b>	2007	Reject	Requested either elimination of antlerless deer hunt or to only allow for antlerless deer harvest every other year.
<b>WP10-19</b>	2010	Reject	Requested modification of female deer season from Oct. 15-Dec. 31 to Sept. 15-Oct. 15
<b>WP10-20</b>	2010	Reject	Requested modification of the non-Federally qualified closure from Aug. 1-15 to July 24-31.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP10-22</b>	2010	Adopt with modification. The modification provided delegations to the ten USFS District Rangers via letter and was to apply only to wildlife. Any fish delegation requests would have to be submitted to the Board.	The delegated in-season management for wildlife on a species by species basis, by letter, to the ten District Rangers located in Units 1-5
<b>WSA11-01</b>	2011	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP12-08</b>	2012	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP14-03</b>	2014	Reject	Eliminate antlerless deer season
<b>WP14-04</b>	2014	Reject	Request early start date for Federally qualified users over 60 or disabled.
<b>WP16-01</b>	2016	Adopt with mod adding January season, but rejected non-qualified harvest reduction	Requested non-Federally qualified users be restricted to two deer and extension season closing date from Dec. 31 to Jan. 31
<b>WP16-05</b>	2016	Adopted	Requests the language stating the Unit 2 deer harvest limit may be reduced to four deer in times of conservation be removed
<b>WP16-08</b>	2016	Adopted	Requests deer harvest ticket #5 be validated out of sequence to record female deer taken in Unit 2.
<b>WP18-01</b>	2018	Adopt w/ mod to accept harvest limit restriction but oppose season reduction	Limit harvest to two deer from Federal public lands the reduce season by one week or more for non-Federally qualified subsistence users
<b>WP18-02</b>	2018	Adopted	Requested modification of deer C&T for Units 1-5 to all rural residents of Units 1-5.



<b>WP20-06 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-06 requests reducing the season ending date for deer in Unit 2 from January 31 to December 31. <i>Submitted by the East Prince of Wales Advisory Committee.</i>
<b>Proposed Regulation</b>	<p><b>Unit 2—Deer</b></p> <p><i>5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–<del>Jan</del>Dec. 31 July 24–<del>Jan</del>Dec. 31.</i></p> <p><i>Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.</i></p> <p><i>The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Support</b>

## DRAFT STAFF ANALYSIS WP20-06

### ISSUES

Wildlife Proposal WP20-06, submitted by the East Prince of Wales Fish and Game Advisory Committee, requests reducing the season ending date for deer in Unit 2 from January 31 to December 31.

### DISCUSSION

The proponent states that removing the January portion will prevent regulatory confusion for subsistence users while benefiting the Unit 2 deer population. The proponent believes removing January from the season will not be detrimental to Federally qualified subsistence users, as they still have a subsistence priority to harvest deer starting on July 24, prior to the beginning of the State season on August 1.

#### Existing Federal Regulation

##### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer July 24-Jan. 31 may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.*

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

#### Proposed Federal Regulation

##### Unit 2—Deer

*5 deer; however, no more than one may be a female deer. Female deer July 24-~~Jan~~Dec. 31 may be taken only during the period Oct. 15-~~Jan~~Dec. 31. Harvest ticket number five must be used when recording the harvest of a female*

*deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.*

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## **Existing State Regulation**

### **Unit 2 – Deer**

*Residents and non-residents: Four bucks*

*Aug. 1 – Dec. 31*

*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.*

## **Extent of Federal Public Lands/Waters**

Unit 2 is comprised of 74% Federal public lands and consist of 73% U.S. Forest Service (USFS) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit Map**).

## **Customary and Traditional Use Determinations**

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

## **Regulatory History**

Hunting regulations have permitted the harvest of deer in Unit 2 since 1925 (**Appendix 1**). During this period, season closing dates have varied between November and December, with December 31 being the most common closing date since 1988. Seasons and harvest limits for Federally qualified subsistence users in Unit 2 are more liberal than State regulations. Federal regulations have allowed the harvest of one female deer in Unit 2 since 1995, as well as the harvest of five deer beginning in 2006.

Following years of numerous Unit 2 related deer proposals (**Appendix 2**) submitted to the Federal Subsistence Board (Board), the Unit 2 Deer Planning Subcommittee (Subcommittee) was formed in 2004 to address contentious deer management issues in Unit 2. At the request of the Board, the Council established the 12-member Subcommittee to address concerns that Federally qualified subsistence users in Unit 2 were unable to harvest enough deer to meet their needs. The Subcommittee included residents

of Craig, Hydaburg, Ketchikan, Petersburg, Point Baker, and Wrangell, to reflect the range of users of Unit 2 deer, along with representatives from State and Federal wildlife management agencies.

The Subcommittee developed management recommendations at a series of five public meetings held in communities that depend upon Unit 2 deer. Both Federally and non-Federally qualified users participated at these meetings. The Subcommittee recommended that deer harvest management tools could be applied in Unit 2 as deer population trends and hunting use patterns changed. The degree to which these tools would be employed would be decided through the established public regulatory processes (SEASRAC 2006).

In 2006, the Board implemented two major changes to the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09, both with modification. Adoption of WP06-08 as modified, reopened a portion of Federal public lands to non-Federally qualified users on the southeast side of Prince of Wales Island. Adoption of WP06-09 as modified, established the current five deer harvest limit for Federally qualified subsistence users (FSB 2006). Two other proposals, WP06-06 and WP06-10, related to the use of harvest tickets in Unit 2 and were unanimously opposed by the Council and rejected by the Board (FSB 2006).

Three proposals related to Unit 2 deer were submitted from 2007-2012. Proposal WP07-07 requested the female deer season be closed, Proposal WP10-19 requested a change to the female deer season, and Proposal WP10-20 requested the August closure to non-Federally qualified users be lifted. The Council opposed and the Board rejected these proposals (FSB 2007, 2010).

Also during 2010, the Board adopted WP10-22 with modification delegating management authority for wildlife by letter to the ten District Rangers located in Units 1-5. As a result, the delegated authority in Unit 2 changed from the Tongass Forest Supervisor to the District Rangers of both the Craig and Thorne Bay Ranger Districts. For deer, their scope of delegation allows them to set harvest quotas; to close, reopen or adjust Federal subsistence deer seasons; and to adjust harvest and possession limits for that species. Most likely, this type of action would occur prior to the season. Any action greater than 60 days in length requires a public hearing before implementation. They may also close Federal Public lands to the take of this species to all users. This type of action would most likely take place during the season. Action on the proposal also removed the requirement for consultation with the both Council Chair and ADF&G, as this was already defined protocol within the Special Action process (FSB 2010).

Two proposals were considered for deer in Unit 2 in 2013. Proposal WP14-03 requested the female deer season be eliminated whereas Proposal WP14-04 asked for an earlier season to be established for Federally qualified subsistence users over the age of 60 or physically disabled. The Council unanimously opposed and the Board rejected these proposals (SEASRAC 2013; FSB 2014).

Three proposals were considered for deer in Unit 2 in 2015. Proposal WP16-01 requested a harvest limit reduction for non-Federally qualified users as well as an extension of the Federal season through the month of January. This proposal was broken into two sub-proposals by the Council who opposed the harvest limit reduction but supported the season extension with the following justifications: 1) the Unit 2 deer population was stable; 2) January harvest was a traditional practice according to testimony; 3) any additional female deer harvest was believed to be minimal and sustainable; and 4) the USFS District

Ranger in Unit 2 has delegated authority to close the season early if conservation needs arise. The Board adopted the proposal as modified by the Council. Proposal WP16-05 requested removal of language regarding a harvest limit reduction during times of conservation because that authority is included by delegation to the Federal in-season manager and WP16-08 requested harvest ticket #5 be used out of sequence when harvesting a female deer. Both proposals were unanimously supported by the Council and adopted by the Board (SEASRAC 2015; FSB 2016).

Proposal WP18-01 was considered during the 2018 regulatory cycle. The proposal requested a reduction of both the season length and the harvest limit for non-Federally qualified users. The Council divided the proposal into two action items where they supported the harvest limit reduction but opposed the shortening of the season. The Board adopted the harvest limit reduction as recommended by the Council based on testimony from Federally qualified subsistence users that they were not meeting their needs. The Board rejected the season date reduction because they believed it would not provide additional benefits as harvests in December were minimal by both user groups and that subsistence users already had additional priorities available in the form of; the week in July, the closure to non-Federally qualified users in August, the ability to harvest a female deer starting October 15, a season extension into the month of January and the ability to harvest up to five deer total (SEASRAC 2017; FSB 2018a).

Due to administrative delays in the Federal Rule Making Process, on August 8, 2018, the Board approved temporary delegated authority to some Federal land managers to enact temporary changes to Federal Subsistence Regulations adopted by the Board during the April 2018 regulatory meeting (FSB 2018b). This delegation of authority was established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6). As a result, emergency special action 13-BD-06-18 was issued on August 16, 2018 by the USFS District Ranger restricting the harvest of deer by non-Federally qualified users to two male deer on Federal Public lands in Unit 2. The action was set to expire on October 15, 2018 or when the 2018-2020 Federal Subsistence Wildlife Regulations were published in the Federal Register.

Proposal WP18-02, requesting the Customary and Traditional use determination for deer in Units 1-5 be modified to include all rural residents of Units 1-5, was also considered during the 2018 regulatory cycle. This proposal had unanimous support from the Council and was adopted by the Board as a consensus agenda item (SEASRAC 2017; FSB 2018a).

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

The proponent also submitted Proposals WP20-03, -04, -05, and -07 regarding deer in Unit 2. The proponent was contacted to clarify the intent and reasoning of each proposal. The proponent stated their overall intent was to provide the Board with a suite of management options to increase the deer population and hunter success in Unit 2. Additionally, WP20-02 was submitted by the Alaska Department of Fish and Game (ADF&G), requesting removal of the harvest limit reduction for non-Federally qualified users.

## Biological Background

Sitka black-tailed deer spend the winter and early spring at low elevation on steep slopes where there is less snow accumulation, and old-growth forests provide increased intermixing of snow-intercept and foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet energetic needs of lactating does. Some deer migrate and follow the greening vegetation up to alpine for the summer, while others remain at lower elevations. The breeding season, or rut, generally occurs late October through late November (ADF&G 2009) generally peaking around mid-November. Wolves and black bears are the primary predators present in Unit 2, and may reduce deer populations or increase recovery times after severe winters.

Deer populations in Southeast Alaska fluctuate and are primarily influenced by winter snow depths (Olson 1979). Deer in Southeast Alaska typically have trouble meeting their energy needs in winter (Hanley and McKendrick 1985, Parker et al. 1999), and winters with long periods of deep snow that restrict the availability of forage can result in deer depleting their energy reserves to the point of starvation (Olson 1979).

Summer nutrition is important for building body reserves to sustain deer through the winter (Stewart et al. 2005). Few studies have been conducted on summer habitat conditions because winter habitat carrying capacity is generally considered to be the limiting factor for deer in Southeast Alaska. However, deer populations at or above habitat carrying capacity are affected by intra-specific competition for food and may enter winter in reduced body condition compared to deer populations below carrying capacity (Kie et al. 2003, Stewart et al. 2005). This can result in higher susceptibility to severe winters and lower productivity (Kie et al. 2003, Stewart et al. 2005). In addition, nutritionally stressed does produce smaller and fewer fawns (Olson 1979).

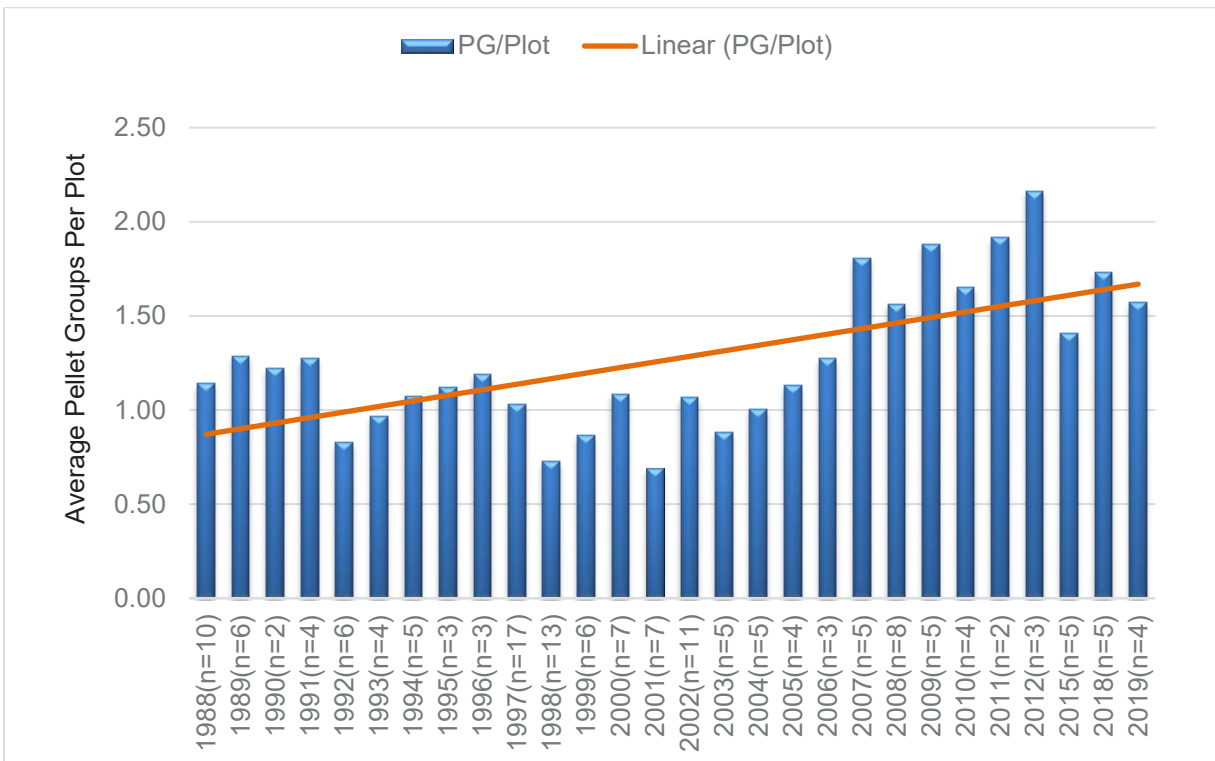
### Recent population indices

There are no methods to directly count deer in Southeast Alaska, so ADF&G conducts deer pellet surveys as an index to the relative abundance of the deer population. Relating pellet group data to population levels is difficult, however, because factors other than changes in deer population size can affect deer pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same zones each year. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer (McCoy 2011).

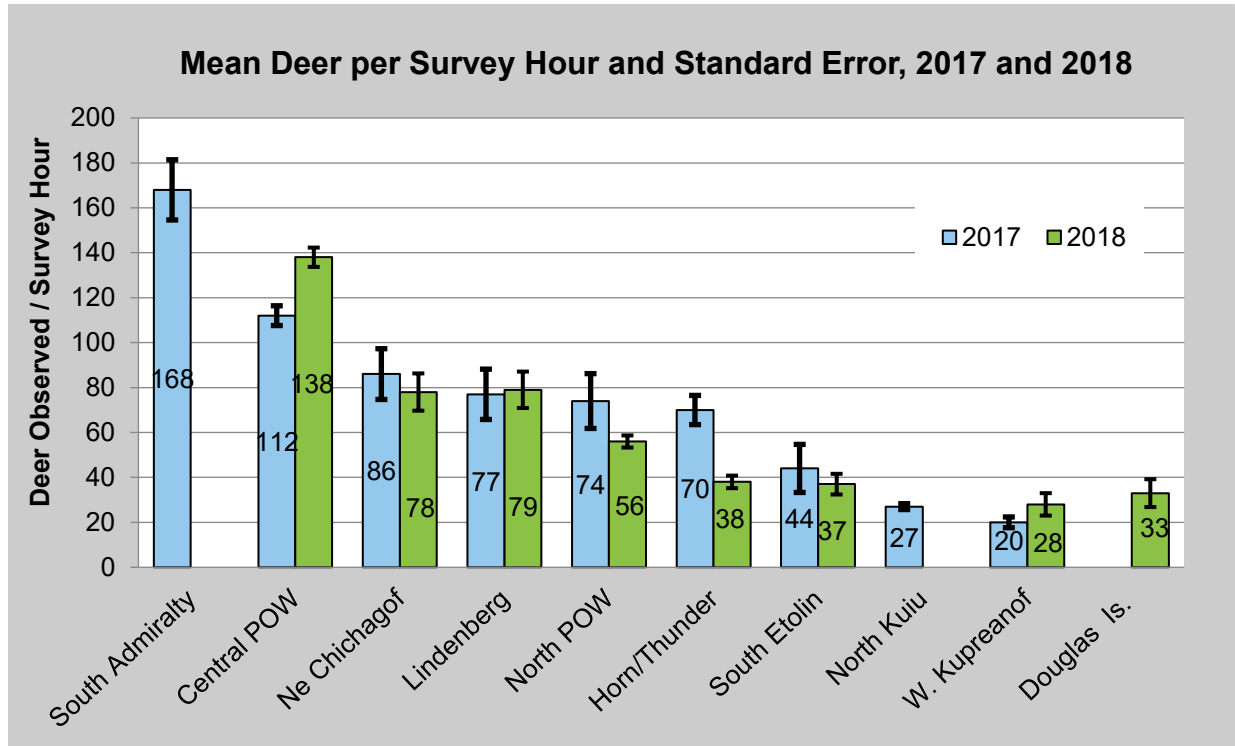
Brinkman et al. (2013) questioned the value of pellet-group surveys for monitoring population trends due to the variability in the data compared to DNA based pellet counts. Pellet group transects were designed to detect large (>30%) changes in abundance and are not an appropriate tool for monitoring smaller year to year changes. Although pellet-group surveys remain the only widely available deer population data, the results should be interpreted with caution. Pellet-group data in Unit 2 suggests a generally increasing population trend since a low during the late 1990s and early 2000s (**Figure 1**). This contrasts with Brinkman et al. (2011) who used a DNA based technique and estimated a 30% population decrease from 2006–2008 which they attributed to three consecutive winters with deep snow. Brinkman's study was

limited to three watersheds, and the population changes during the study varied by watershed. It appears that populations subsequently increased after those severe winters and Bethune (2011) felt that by 2010 the Unit 2 deer population was healthy, stable to increasing, and at a 12-15 year high.

ADF&G began testing alpine deer aerial survey techniques in 2013 (**Figure 2**). 2017 was the first year with an established protocol and consistent surveys across southeast Alaska. ADF&G is still researching the correlation between alpine surveys and actual deer populations. Aerial survey numbers seem to reflect the relative abundances expected among various locations, but correlations with population trends are unknown at this time.



**Figure 1:** Annual average pellet group counts and general trend for deer in Unit 2 through 2019 (McCoy 2019a).



**Figure 2:** Aerial alpine surveys across southeast Alaska for 2017 and 2018 (McCoy 2019b).

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 and intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Deep snow deer winter range is defined as high value productive old growth (size class 5, 6, 7) on south facing slopes below 800 feet, and this is considered to be the limiting habitat for deer in Southeast Alaska. Some areas of Unit 2 have been impacted by large scale changes in habitat due to timber harvest, while the habitat is largely intact in other areas. Young-growth forest treatments (e.g., thinning, small gap creation, branch pruning) can benefit deer forage development in previously harvested stands. Regardless, areas with substantial timber harvest are expected to have lower long-term carrying capacity compared to pre-harvest conditions.

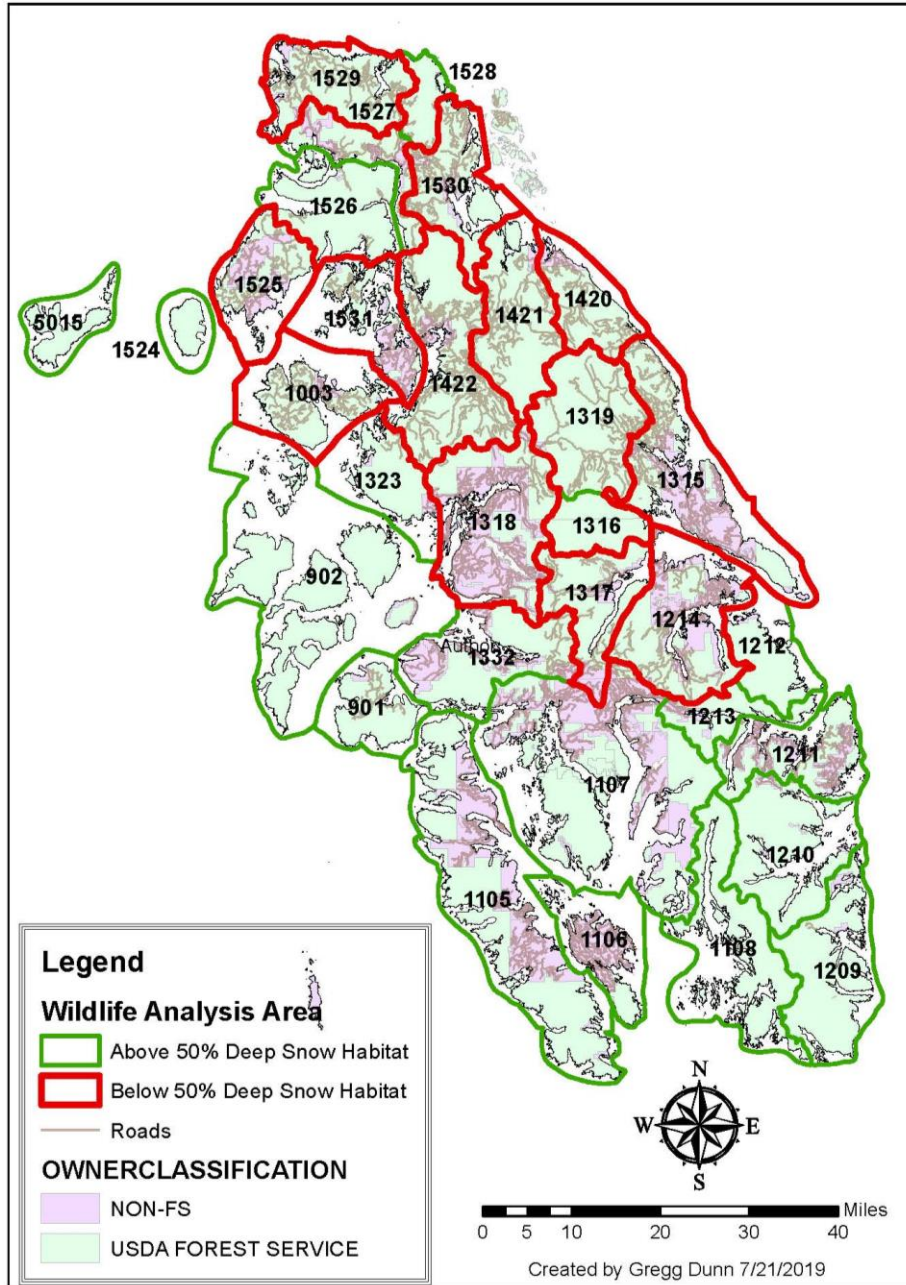
There is 62% of deer winter habitat remaining in GMU 2 (**Table 1**) with WAAs 1214, 1315, 1317, 1318, 1420, 1421, 1525, 1529, 1530, 1531 having below 50% habitat remaining. This is from past timber harvest and road building. In the case of a severe winter, these will be the areas hit hardest with deer mortality since there is little habitat left to sustain them. Habitat conditions would not improve as the areas harvested have reached stem exclusion which can last from 25 year post harvest to 150 years post-harvest. **Figure 3** can be used to see where the least amount of habitat remains and if you compare it to **Table 1** you can see where harvest is greatest compared to available habitat. Most wildlife analysis areas (WAA) with less than 50% deep snow deer winter habitat have the highest harvest rates.



Conditions on the ground within the last few years have remained stable because of mild winters and later arrival of snow in Unit 2 allowing the deer to forage longer at altitude and in areas such as muskegs. Prolonged snowpack during a severe winter or within later stages of winter could have a greater effect on deer populations going forward since there is far less habitat available during those periods.

**Table 1:** Overall percent of historical habitat since 1954 (beginning of large scale logging) remaining by wildlife analysis area (WAA) in GMU 2 for deep snow deer winter habitat and all productive old growth, average harvest since 2005, and harvest trend.

WAA	Productive Old Growth	Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)	Average Reported Harvest by WAA since 2005 and trend
901	89	85	69 ↑
902	100	100	79 ↓
1003	51	49	46 ↑
1105	99	99	84 ↑
1106	100	100	25 ↓
1107	97	93	138 ↑
1108	99	99	17 ↑
1209	100	100	10 ↑
1210	99	99	50 ↑
1211	83	78	36 ↑
1213	99	99	21 ↑
1214	67	48	245 ↑
1315	55	29	350 ↑
1316	99	100	27 ↓
1317	56	23	145 ↑
1318	78	49	220 ↑
1319	74	61	229 ↓
1323	90	76	18 ↓
1332	80	72	76 →
1420	54	27	308 ↑
1421	71	44	107 ↓
1422	51	29	386 ↓
1525	51	40	21 ↑
1526	93	83	18 ↑
1527	67	61	23 ↓
1528	82	84	37 →
1529	55	46	144 ↓
1530	50	37	145 ↑
1531	55	49	37 ↓



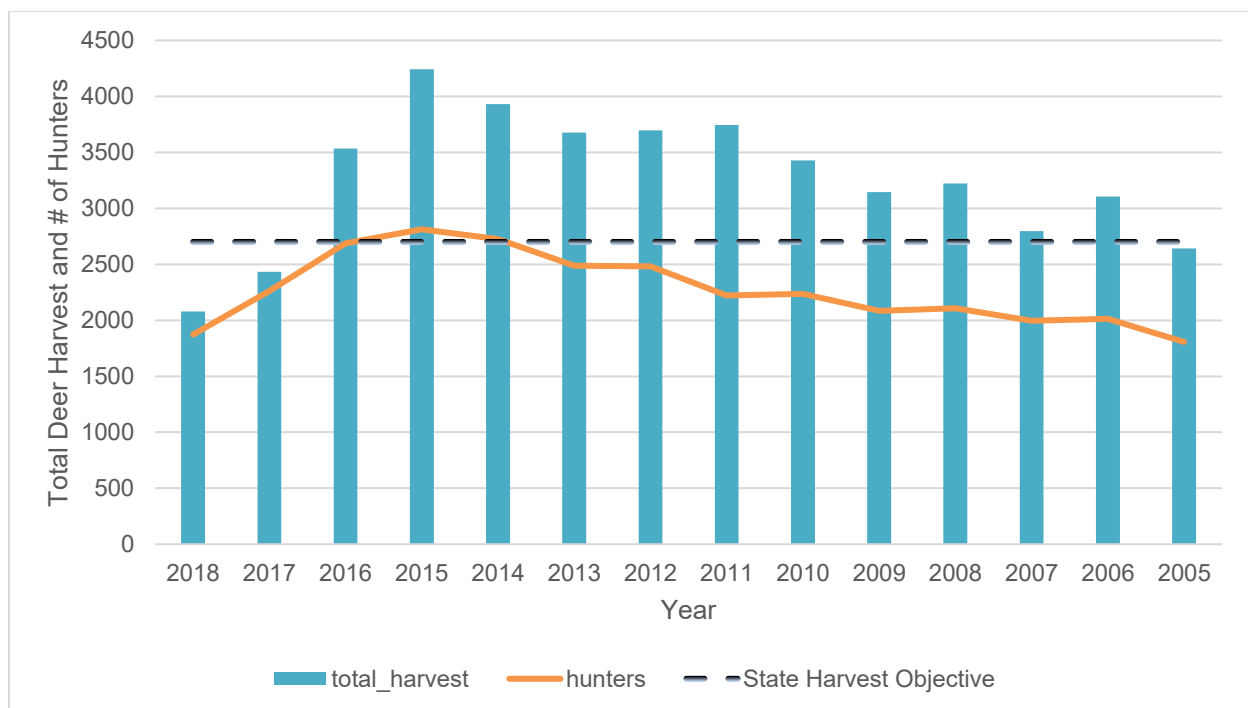
**Figure 3:** Map of Unit 2 showing deep snow deer winter habitat availability and where habitat is below 50% in WAAs. Note: WAA 5015 is not part of Unit 2.

### Harvest History

Harvest data reported below are provided by ADF&G (McCoy 2019b) and are gathered by several reporting systems including the Region 1 (Southeast Alaska) deer survey, Unit 2 deer harvest report, and the State-wide deer harvest report. The Region 1 deer survey is the most consistent report, covering the years 1997–2010 and is based on a sample of hunters. In general, 35% of hunters from each community were sampled annually and while response rates vary by community, the overall response rate across

communities was approximately 60% each year. Harvest numbers were extrapolated using expansion factors that are calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response was low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and interpreted with caution. Trends, however, should be fairly accurate, especially at larger scales. The Unit 2 deer report was in place from 2005–2010 and was instituted specifically for reporting deer harvest in Unit 2. In 2011, the statewide deer report replaced the other deer harvest reporting systems and requires reporting of harvest by all deer hunters. Different expansion factors are used for the various data sets so that total harvest estimates between years are comparable (McCoy 2013).

Action taken by the Alaska Board of Game in fall 2000 established a harvest objective of 2,700 deer for Unit 2 as they identified the population as important for satisfying high levels of human consumptive use (Bethune 2013). Estimated deer harvest in Unit 2 from 2005–2018 can be found in **Figure 4**. The estimated average total annual harvest is 3,467 deer. Harvests have been at or above ADF&G’s Unit 2 harvest objective from 2005-2016 and fell below harvest objectives during the 2017 and 2018 seasons. Deer harvest reached historically high levels in 2015 and then began to decline since. The same pattern can also be seen with hunter numbers participating in Unit 2 (**Figure 4**).



**Figure 4:** Total deer harvest and number of hunters during the 2005-2018 seasons in Unit 2 and showing the state harvest objective of 2,700 deer (McCoy 2019b).

Prior to implementation of Federal regulations, opportunity to harvest female or antlerless deer was available under State regulations from 1955-1972. From 1973-1977, opportunity for female deer was still available, however, the harvest limit was reduced. During the 1987 season, the opportunity to harvest one

female deer under State regulations was re-implemented, but did not get extended due to the unpopularity of the hunt in many local communities. Harvest data for these years are not available.

Although Federal regulations for hunting deer in Unit 2 started in 1991, the opportunity to harvest female or antlerless deer was not allowed until the 1995 season. Between 1998 and 2005, a Federal permit was required, however this requirement was removed with the establishment of first a unit-wide, then statewide harvest report attached to the deer harvest tickets. From 2001-2018, the reported female deer harvest in Unit 2 has ranged from 57 to 119 animals per year, with an overall annual average of 88 female deer. During this same period, the harvest of female deer has averaged only 3% of the total deer harvest (OSM 2019; McCoy 2019b). More recently, although the average reported female deer harvest increased to 101 since 2005, the female deer harvest percentage has actually decreased to 2.9% of the total reported deer harvest (McCoy 2019b).

Opportunity to legally harvest deer in January in Unit 2 under Federal regulations has been available since the 2016 regulatory season. Reported deer harvests during the month of January in Unit 2 (**Table 1**) have ranged from 11 to 26 (<1% of total harvest) with male deer comprising 45.4% to 61.5% of this harvest (McCoy 2019b).

**Table 2:** Deer harvests by month in Unit 2 from 2016-2018 (McCoy 2019b)

Reg. year	July	Aug	Sept	Oct	Nov	Dec	Jan	Totals
2016	175	540	362	642	1627	168	26	3532
2017	101	436	208	312	1247	99	12	2432
2018	55	339	162	269	1165	73	11	2079

### Effects of the Proposal

If adopted, the proposal would reduce harvest opportunity for Federally qualified subsistence users hunting deer on Federal public lands in Unit 2. Removing the opportunity to harvest deer during January would reduce harvest but does not guarantee reproductive success within the Unit 2 deer population. The amount of deer available for future seasons would be negligible. Reported deer harvest during January have been very low (12-26 deer) and does not appear to be limiting the deer population on a unit-wide scale. Adoption of the proposal does not prevent future conservation issues as deer populations in Unit 2 are more greatly affected by habitat and winter weather conditions than by harvest.

### OSM PRELIMINARY CONCLUSION

**Oppose** Proposal WP20-06.

### Justification

During the 2016 regulatory cycle, both the Council and the Board unanimously supported the January season extension and provided thorough justifications on the record in support. Removal of the January

season is unnecessarily contradictory to the Board's intent when they adopted the regulation change as recommended by the Council.

Reducing the season length is not necessary for continuation of future subsistence opportunity for Federally qualified subsistence users nor for the conservation of the deer populations in Unit 2. Deer harvest during January has been very minimal (12-26 deer) and does not appear to be creating a conservation issue across the unit. Adopting the proposal will not prevent future conservation issues as the deer population is affected more by available habitat and winter weather conditions than current levels of harvest. If future harvests increase or winter conditions dramatically reduce deer numbers creating a conservation concern, the delegated in-season manager can reduce the season length accordingly.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		



Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDICES

## Appendix 1: Regulatory framework of State and Federal deer seasons by year since 1925

Year	Type of Season	Season	Limit	Conditions & Limitations
1925	Open	Sept 15-Dec 16	3	Buck, 3" antlers or longer
1925-1929	Open	Sept 1-Nov 30	3	Buck, 3" antlers or longer
1930-1941	Open	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Resident	Sept 16-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Non-resident	Sept 16-Nov 15	1	Buck, 3" antlers or longer
1944-1948	Resident	Sept 1-Nov 7	2	Buck, 3" antlers or longer
1944-1948	Non-resident	Sept 1-Nov 7	1	Buck, 3" antlers or longer
1949	Resident	Sept 1-Nov 15	2	Buck, 3" antlers or longer
1949	Non-resident	Sept 1-Nov 15	1	Buck, 3" antlers or longer
1950-1951	Resident	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1950-1951	Non-resident	Aug 20-Nov 15	1	Buck, 3" antlers or longer
1952	Open	Aug 20-Nov 22	2	Buck, 3" antlers or longer
1953-1954	Open	Aug 20-Nov 22	3	Buck, 3" antlers or longer
1955	Open	Aug 20-Nov 22	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 15-Nov 22
1956	Open	Aug 20-Nov 26	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 13-Nov 26
1957-1959	Open	Aug 20-Nov 30	4	4 deer, does may be taken Oct 15-Nov 30
1960	Open	Aug 20-Dec 15	4	4 deer, does may be taken Oct 15-Nov 30
1961	Open	Aug 20-Nov 30	4	4 deer, antlerless deer may be taken Sept 15-Nov 30

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
<b>1962</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1963-1967</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1968</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1969-1971</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1972</b>	Open	Aug 1-Dec 31	3	3 deer, antlerless deer may be taken Nov 1-Nov 30
<b>1973-1977</b>	Open	Aug 1-Nov 30	3	1 antlerless deer may be taken Nov 1-Nov 30
<b>1978-1984</b>	Open	Aug 1-Nov 30	3	Antlered deer
<b>1985-1986</b>	State General	Aug 1-Nov 30	3	Antlered deer
<b>1987</b>	State General	Aug 1-Nov 30	4	1 antlerless deer may be taken Oct 10-Oct 31
<b>1988-2018</b>	State General	Aug 1-Dec 31	4	Antlered deer/bucks
<b>1991-1994</b>	Federal Subsistence	Aug 1-Dec 31	4	Antlered deer
<b>1995-1997</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken only during Oct 15-Dec 31
<b>1998-2002</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2003-2005</b>	Federal Subsistence	July 24-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2006-2009</b>	Federal Subsistence	July 24-Dec 31	5	No more than one may be an antlerless deer; antlerless deer may be taken Oct 15-Dec 31

Year	Type of Season	Season	Limit	Conditions & Limitations
2010-2015	Federal Subsistence	July 24-Dec 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Dec 31
2016-2018	Federal Subsistence	July 24-Jan 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Jan 31.

**Appendix 2:** History of Federal regulatory actions related to deer in Unit 2 taken by the Federal Subsistence Board.

Proposal number	Reg Year	FSB action	Proposal request
P95-01	1995	Adopt w/ mod to require harvest report requirement	Create an antlerless season in Unit 2
R95-09	1995	Reject	Requested rescinding antlerless deer season created by adoption of P95-01
P97-07	1997	Reject	Reduce deer season from Aug. 1-Dec. 31 to Sept. 1-Dec. 31, and eliminate harvest of antlerless deer in Unit 2.
P98-09	1998	Reject	Eliminate antlerless season
P98-10	1998	Reject	Eliminate antlerless season and apply antler restriction of forked horn or larger
P98-11	1998	Reject	Shorten deer season from Sept 1 -Nov. 30
P98-12	1998	Reject	Eliminate antlerless season
P00-005	2000	Reject	Eliminate antlerless season
P00-05	2000	Reject	Eliminate antlerless deer season
P00-06	2000	Reject	Community harvest permit request of 500 deer per Unit 2 community
WP01-03	2001	Reject	Eliminate antlerless deer season
WP02-08	2002	Reject	Request increase of deer harvest limit for Unit 2 residents and reduction for Unit 1A and 3 residents
WP02-09	2002	Took no action	Restrict non-Federally qualified users from hunting on Federal lands between Aug. 1-31 and Oct. 16-Nov. 14
WRFR02-01	2002	Reject	Requested reconsideration of the Board rejecting WP02-09 to close Federal lands in Unit 2.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP03-04</b>	2003	Adopt with modification adding one week in July at front of season (July 24-31)	Requested earlier extension of deer season for Federally qualified users
<b>WP03-05</b>	2003	Adopt with modification restricting non-Federally qualified users from Aug 1-21 on Federal Public Lands on Prince of Wales Island (closure for 1 year)	Requested closure of Federal public lands from Aug 1-Sept. 1 and reduction of harvest limit to 2 deer for non-Federally qualified subsistence users.
<b>WP04-03</b>	2004	Took no action	Requested closure be changed from Aug 1-21 to Oct. 16-Nov. 14 and reduction of harvest limit for non-Federally qualified users
<b>WP04-04</b>	2004	Took no action	Requested antlerless deer season be modified from Oct. 15-Dec. 31 to Aug. 1-Sept. 15
<b>WP04-05</b>	2004	Took no action	Requested closure to non-Federally qualified users be reduced by one week
<b>WP04-06</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-07</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-08</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-09</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with antler restrictions for non-Federally qualified users.
<b>WP04-10</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with a 3 buck harvest limit for non-Federally qualified users.
<b>WP04-11</b>	2004	Took no action	Requested removal of the July 24 start date for subsistence users and to modify closure from Aug. 1-21 to Oct. 16-Dec. 31 and implement a 2 buck harvest limit for non-Federally qualified users.
<b>WP04-12</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-Jan. 31 for subsistence users and modified the August closure to the month of January to all but Unit 2 residents

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP04-13</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-10 and removing the antlerless deer season for subsistence users and reducing the August closure from Aug. 1-10 for non-Federally qualified users.
<b>WP04-14</b>	2004	Took no action	Reduce deer season from July 24-Dec. 31 to Aug. 1-Dec. 31 for Federally qualified users in Unit 2.
<b>WP04-15</b>	2004	Adopt with modification restricting non-Federally qualified users from Aug 1-15 on Federal Public Lands on Prince of Wales Island	Requested continuation of the one year closure as passed by the FSB during the 2003 regulatory cycle.
<b>WP05-04</b>	2005	Adopt with modification removing registration requirement, but required use of a joint State/Federal harvest report as recommended by the Unit 2 Deer Subcommittee	Requested that all hunters obtain a Federal registration permit to hunt deer in Unit 2.
<b>WP06-06</b>	2006	Reject	Requested removing sequential use of harvest tickets and possession of all unused harvest ticket requirements.
<b>WP06-07</b>	2006	Took no action	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-08</b>	2006	Adopt with modification. Modifications included: 1) removal of the August closure on SE portion of Prince of Wales Island; 2) rejected closure to non-Federally qualified users on Suemez Island; and 3) rejected a closure to non-Federally qualified users on the islands located along the SW coast of Prince of Wales Island.	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-09</b>	2006	Adopt with modification. The Board modified the Council recommendation by eliminating the need to have a Federal permit for harvesting a 5th deer. The Board also delegated the Forest Supervisor the ability to lower the harvest limit to 4 deer if needed.	Requested increasing the deer harvest limit to 6 deer.
<b>WP06-10</b>	2006	Reject	Requested use of harvest ticket #1 to record harvest of a female deer.
<b>WP07-07</b>	2007	Reject	Requested either elimination of antlerless deer hunt or to only allow for antlerless deer harvest every other year.
<b>WP10-19</b>	2010	Reject	Requested modification of female deer season from Oct. 15-Dec. 31 to Sept. 15-Oct. 15
<b>WP10-20</b>	2010	Reject	Requested modification of the non-Federally qualified closure from Aug. 1-15 to July 24-31.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP10-22</b>	2010	Adopt with modification. The modification provided delegations to the ten USFS District Rangers via letter and was to apply only to wildlife. Any fish delegation requests would have to be submitted to the Board.	The delegated in-season management for wildlife on a species by species basis, by letter, to the ten District Rangers located in Units 1-5
<b>WSA11-01</b>	2011	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP12-08</b>	2012	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP14-03</b>	2014	Reject	Eliminate antlerless deer season
<b>WP14-04</b>	2014	Reject	Request early start date for Federally qualified users over 60 or disabled.
<b>WP16-01</b>	2016	Adopt with mod adding January season, but rejected non-qualified harvest reduction	Requested non-Federally qualified users be restricted to two deer and extension season closing date from Dec. 31 to Jan. 31
<b>WP16-05</b>	2016	Adopted	Requests the language stating the Unit 2 deer harvest limit may be reduced to four deer in times of conservation be removed
<b>WP16-08</b>	2016	Adopted	Requests deer harvest ticket #5 be validated out of sequence to record female deer taken in Unit 2.
<b>WP18-01</b>	2018	Adopt w/ mod to accept harvest limit restriction but oppose season reduction	Limit harvest to two deer from Federal public lands the reduce season by one week or more for non-Federally qualified subsistence users
<b>WP18-02</b>	2018	Adopted	Requested modification of deer C&T for Units 1-5 to all rural residents of Units 1-5.

<b>WP20–07 Executive Summary</b>	
<b>General Description</b>	Proposal WP20–07 requests reducing the Federal harvest limit for deer in Unit 2 from five deer to four deer. <i>Submitted by the East Prince of Wales Advisory Committee.</i>
<b>Proposed Regulation</b>	<p><b>Unit 2—Deer</b></p> <p><del>5</del>4 deer; however, no more than one may be a female deer. Female deer may be taken only July 24-Jan. 31 during the period Oct. 15–Jan. 31. Harvest ticket number <del>five</del><b>four</b> must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number <del>five</del><b>four</b>.</p> <p>The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.</p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Support</b>



**DRAFT STAFF ANALYSIS**  
**WP20-07**

**ISSUES**

Wildlife Proposal WP20-07, submitted by the East Prince of Wales Fish and Game Advisory Committee, requests a reduction of the Federal harvest limit for deer in Unit 2 from five deer to four deer.

**DISCUSSION**

The proponent states that deer populations have been in decline in the unit due to both a growing predator population (wolves and black bears) and years of increasing harvests by hunters. They also state that in addition to the Federal Subsistence Board (Board) reducing the harvest limit of non-Federally qualified users in the unit, that a reduction in harvest to Federally qualified subsistence users is also necessary to rebound the deer population.

Clarification with the proponent over the word “deer” in the proposed language indicated that they were not seeking to change the hunt to the harvest of any deer, but were simply wanting to cap the harvest limit at 4 deer, while retaining the opportunity to harvest a female deer. Although not specified by the proponent in the proposed regulation, modification of which harvest ticket to be required for tagging a female deer will be necessary.

**Existing Federal Regulation**

**Unit 2—Deer**

*5 deer; however, no more than one may be a female deer. Female deer July 24-Jan. 31 may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.*

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## Proposed Federal Regulation

### Unit 2—Deer

*54 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number ~~five~~four must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number ~~five~~four.* July 24-Jan. 31

*The Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.*

## Existing State Regulation

### Unit 2 – Deer

*Residents and non-residents: Four bucks* Aug. 1 – Dec. 31

*Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.*

## Extent of Federal Public Lands/Waters

Unit 2 is comprised of 74% Federal public lands and consist of 73% U.S. Forest Service (USFS) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit Map**).

## Customary and Traditional Use Determinations

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

## Regulatory History

Hunting regulations have permitted the harvest of deer in Unit 2 since 1925 (**Appendix 1**). During this period, season closing dates have varied between November and December, with December 31 being the most common closing date since 1988. Seasons and harvest limits for Federally qualified subsistence

users in Unit 2 are more liberal than State regulations. Federal regulations have allowed the harvest of one female deer in Unit 2 since 1995, as well as the harvest of five deer beginning in 2006.

Following years of numerous Unit 2 related deer proposals (**Appendix 2**) submitted to the Federal Subsistence Board (Board), the Unit 2 Deer Planning Subcommittee (Subcommittee) was formed in 2004 to address contentious deer management issues in Unit 2. At the request of the Board, the Council established the 12-member Subcommittee to address concerns that Federally qualified subsistence users in Unit 2 were unable to harvest enough deer to meet their needs. The Subcommittee included residents of Craig, Hydaburg, Ketchikan, Petersburg, Point Baker, and Wrangell, to reflect the range of users of Unit 2 deer, along with representatives from State and Federal wildlife management agencies.

The Subcommittee developed management recommendations at a series of five public meetings held in communities that depend upon Unit 2 deer. Both Federally and non-Federally qualified users participated at these meetings. The Subcommittee recommended that deer harvest management tools could be applied in Unit 2 as deer population trends and hunting use patterns changed. The degree to which these tools would be employed would be decided through the established public regulatory processes (SEASRAC 2006).

In 2006, the Board implemented two major changes to the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09, both with modification. Adoption of WP06-08 as modified, reopened a portion of Federal public lands to non-Federally qualified users on the southeast side of Prince of Wales Island. Adoption of WP06-09 as modified, established the current five deer harvest limit for Federally qualified subsistence users (FSB 2006). Two other proposals, WP06-06 and WP06-10, related to the use of harvest tickets in Unit 2 and were unanimously opposed by the Council and rejected by the Board (FSB 2006).

Three proposals related to Unit 2 deer were submitted from 2007-2012. Proposal WP07-07 requested the female deer season be closed, Proposal WP10-19 requested a change to the female deer season, and Proposal WP10-20 requested the August closure to non-Federally qualified users be lifted. The Council opposed and the Board rejected these proposals (FSB 2007, 2010).

Also during 2010, the Board adopted WP10-22 with modification delegating management authority for wildlife by letter to the ten District Rangers located in Units 1-5. As a result, the delegated authority in Unit 2 changed from the Tongass Forest Supervisor to the District Rangers of both the Craig and Thorne Bay Ranger Districts. For deer, their scope of delegation allows them to set harvest quotas; to close, reopen or adjust Federal subsistence deer seasons; and to adjust harvest and possession limits for that species. Most likely, this type of action would occur prior to the season. Any action greater than 60 days in length requires a public hearing before implementation. They may also close Federal Public lands to the take of this species to all users. This type of action would most likely take place during the season. Action on the proposal also removed the requirement for consultation with the both Council Chair and ADF&G, as this was already defined protocol within the Special Action process (FSB 2010).

Two proposals were considered for deer in Unit 2 in 2013. Proposal WP14-03 requested the female deer season be eliminated whereas Proposal WP14-04 asked for an earlier season to be established for

Federally qualified subsistence users over the age of 60 or physically disabled. The Council unanimously opposed and the Board rejected these proposals (SEASRAC 2013; FSB 2014).

Three proposals were considered for deer in Unit 2 in 2015. Proposal WP16-01 requested a harvest limit reduction for non-Federally qualified users as well as an extension of the Federal season through the month of January. This proposal was broken into two sub-proposals by the Council who opposed the harvest limit reduction but supported the season extension with the following justifications: 1) the Unit 2 deer population was stable; 2) January harvest was a traditional practice according to testimony; 3) any additional female deer harvest was believed to be minimal and sustainable; and 4) the USFS District Ranger in Unit 2 has delegated authority to close the season early if conservation needs arise. The Board adopted the proposal as modified by the Council. Proposal WP16-05 requested removal of language regarding a harvest limit reduction during times of conservation because that authority is included by delegation to the Federal in-season manager and WP16-08 requested harvest ticket #5 be used out of sequence when harvesting a female deer. Both proposals were unanimously supported by the Council and adopted by the Board (SEASRAC 2015; FSB 2016).

Proposal WP18-01 was considered during the 2018 regulatory cycle. The proposal requested a reduction of both the season length and the harvest limit for non-Federally qualified users. The Council divided the proposal into two action items where they supported the harvest limit reduction but opposed the shortening of the season. The Board adopted the harvest limit reduction as recommended by the Council based on testimony from Federally qualified subsistence users that they were not meeting their needs. The Board rejected the season date reduction because they believed it would not provide additional benefits as harvests in December were minimal by both user groups and that subsistence users already had additional priorities available in the form of; the week in July, the closure to non-Federally qualified users in August, the ability to harvest a female deer starting October 15, a season extension into the month of January and the ability to harvest up to five deer total (SEASRAC 2017; FSB 2018a).

Due to administrative delays in the Federal Rule Making Process, on August 8, 2018, the Board approved temporary delegated authority to some Federal land managers to enact temporary changes to Federal Subsistence Regulations adopted by the Board during the April 2018 regulatory meeting (FSB 2018b). This delegation of authority was established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6). As a result, emergency special action 13-BD-06-18 was issued on August 16, 2018 by the USFS District Ranger restricting the harvest of deer by non-Federally qualified users to two male deer on Federal Public lands in Unit 2. The action was set to expire on October 15, 2018 or when the 2018-2020 Federal Subsistence Wildlife Regulations were published in the Federal Register.

Proposal WP18-02, requesting the Customary and Traditional use determination for deer in Units 1-5 be modified to include all rural residents of Units 1-5, was also considered during the 2018 regulatory cycle. This proposal had unanimous support from the Council and was adopted by the Board as a consensus agenda item (SEASRAC 2017; FSB 2018a).

## **Current Events Involving the Species**

The proponent also submitted Proposals WP20-03, -04, -05, and -06 regarding deer in Unit 2. The proponent was contacted to clarify the intent and reasoning of each proposal. The proponent stated their overall intent was to provide the Board with a suite of management options to increase the deer population and hunter success in Unit 2. Additionally, WP20-02 was submitted by the Alaska Department of Fish and Game (ADF&G), requesting removal of the harvest limit reduction for non-Federally qualified users.

## **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation on steep slopes where there is less snow accumulation, and old-growth forests provide increased intermixing of snow-intercept and foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet energetic needs of lactating does. Some deer migrate and follow the greening vegetation up to alpine for the summer, while others remain at lower elevations. The breeding season, or rut, generally occurs late October through late November (ADF&G 2009) generally peaking around mid-November. Wolves and black bears are the primary predators present in Unit 2, and may reduce deer populations or increase recovery times after severe winters.

Deer populations in Southeast Alaska fluctuate and are primarily influenced by winter snow depths (Olson 1979). Deer in Southeast Alaska typically have trouble meeting their energy needs in winter (Hanley and McKendrick 1985, Parker et al. 1999), and winters with long periods of deep snow that restrict the availability of forage can result in deer depleting their energy reserves to the point of starvation (Olson 1979).

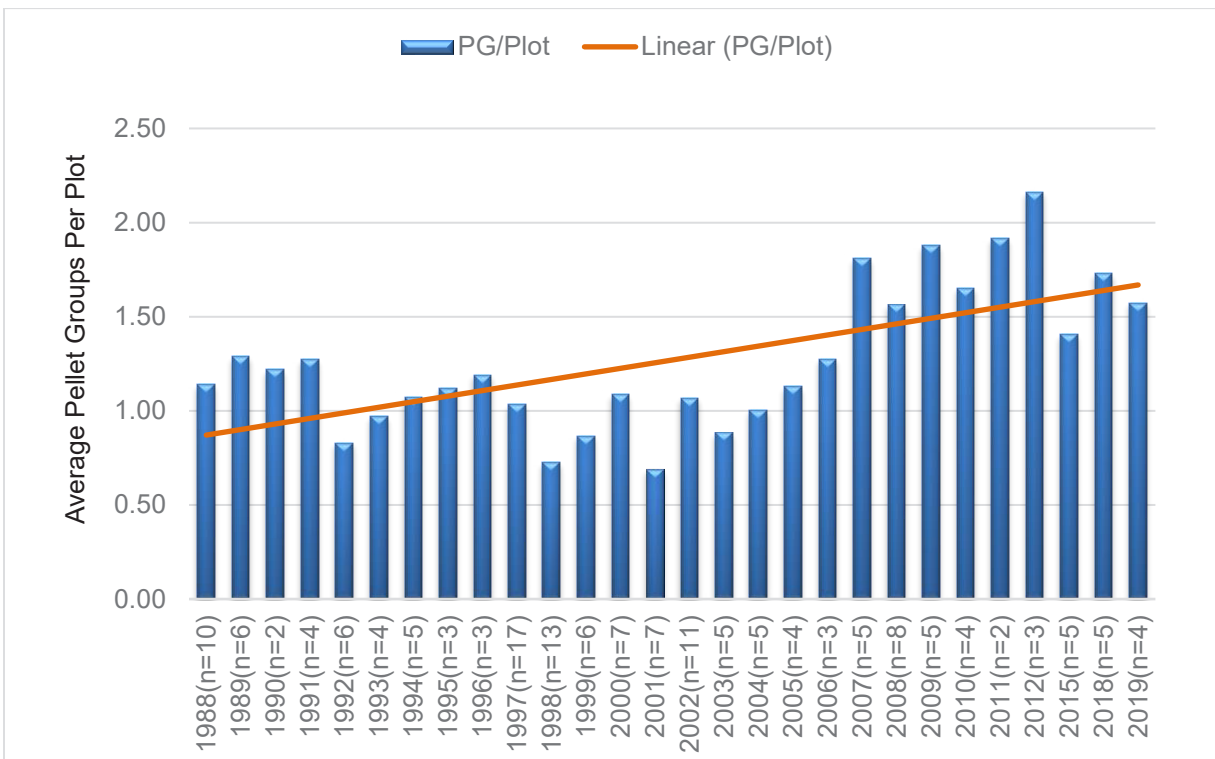
Summer nutrition is important for building body reserves to sustain deer through the winter (Stewart et al. 2005). Few studies have been conducted on summer habitat conditions because winter habitat carrying capacity is generally considered to be the limiting factor for deer in Southeast Alaska. However, deer populations at or above habitat carrying capacity are affected by intra-specific competition for food and may enter winter in reduced body condition compared to deer populations below carrying capacity (Kie et al. 2003, Stewart et al. 2005). This can result in higher susceptibility to severe winters and lower productivity (Kie et al. 2003, Stewart et al. 2005). In addition, nutritionally stressed does produce smaller and fewer fawns (Olson 1979).

### Recent population indices

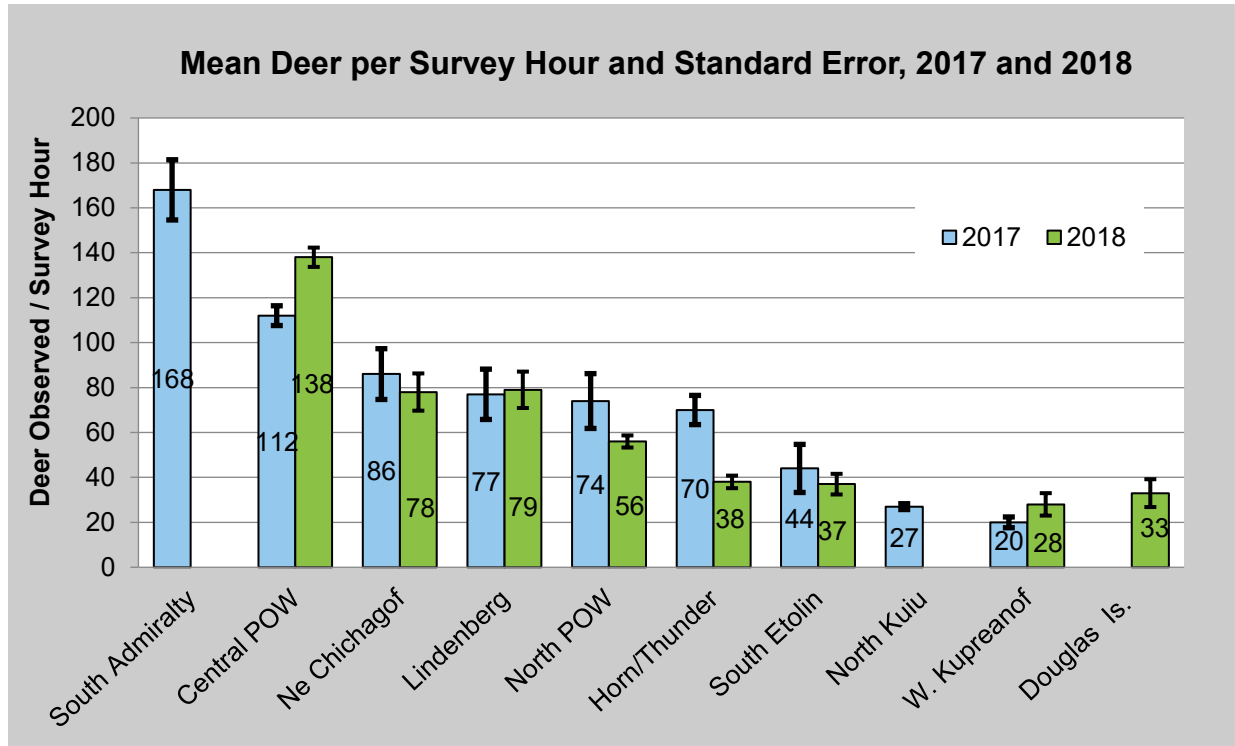
There are no methods to directly count deer in Southeast Alaska, so ADF&G conducts deer pellet surveys as an index to the relative abundance of the deer population. Relating pellet group data to population levels is difficult, however, because factors other than changes in deer population size can affect deer pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same zones each year. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer (McCoy 2011).

Brinkman et al. (2013) questioned the value of pellet-group surveys for monitoring population trends due to the variability in the data compared to DNA based pellet counts. Pellet group transects were designed to detect large (>30%) changes in abundance and are not an appropriate tool for monitoring smaller year to year changes. Although pellet-group surveys remain the only widely available deer population data, the results should be interpreted with caution. Pellet-group data in Unit 2 suggests a generally increasing population trend since a low during the late 1990s and early 2000s (**Figure 1**). This contrasts with Brinkman et al. (2011) who used a DNA based technique and estimated a 30% population decrease from 2006–2008 which they attributed to three consecutive winters with deep snow. Brinkman's study was limited to three watersheds, and the population changes during the study varied by watershed. It appears that populations subsequently increased after those severe winters and Bethune (2011) felt that by 2010 the Unit 2 deer population was healthy, stable to increasing, and at a 12-15 year high.

ADF&G began testing alpine deer aerial survey techniques in 2013 (**Figure 2**). 2017 was the first year with an established protocol and consistent surveys across southeast Alaska. ADF&G is still researching the correlation between alpine surveys and actual deer populations. Aerial survey numbers seem to reflect the relative abundances expected among various locations, but correlations with population trends are unknown at this time.



**Figure 1:** Annual average pellet group counts and general trend for deer in Unit 2 through 2019 (McCoy 2019a).



**Figure 2:** Aerial alpine surveys across southeast Alaska for 2017 and 2018 (McCoy 2019b).

### 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 and intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Deep snow deer winter range is defined as high value productive old growth (size class 5, 6, 7) on south facing slopes below 800 feet, and this is considered to be the limiting habitat for deer in Southeast Alaska. Some areas of Unit 2 have been impacted by large scale changes in habitat due to timber harvest, while the habitat is largely intact in other areas. Young-growth forest treatments (e.g., thinning, small gap creation, branch pruning) can benefit deer forage development in previously harvested stands. Regardless, areas with substantial timber harvest are expected to have lower long-term carrying capacity compared to pre-harvest conditions.

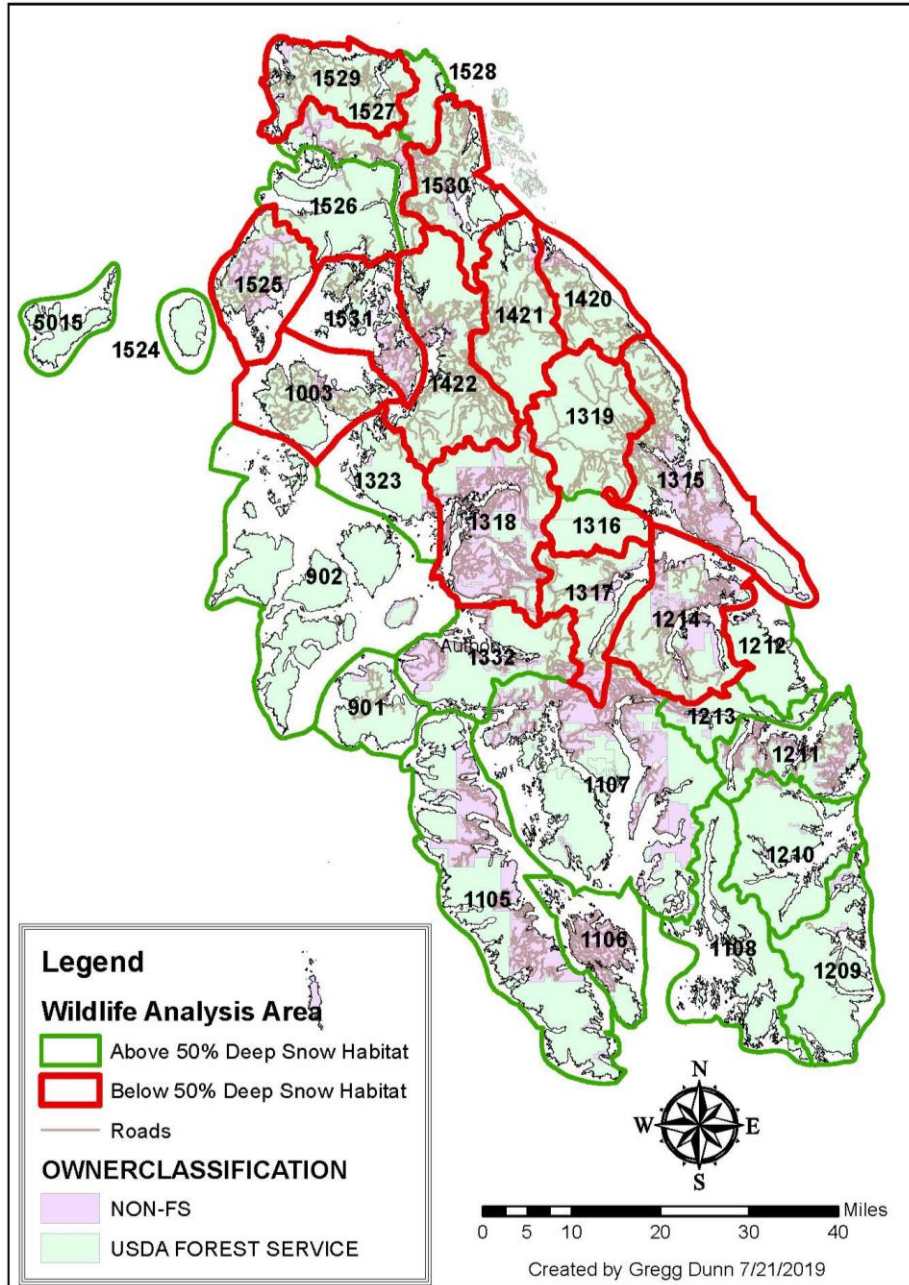
There is 62% of deer winter habitat remaining in GMU 2 (**Table 1**) with WAAs 1214, 1315, 1317, 1318, 1420, 1421, 1525, 1529, 1530, 1531 having below 50% habitat remaining. This is from past timber harvest and road building. In the case of a severe winter, these will be the areas hit hardest with deer mortality since there is little habitat left to sustain them. Habitat conditions would not improve as the areas harvested have reached stem exclusion which can last from 25 year post harvest to 150 years post-harvest. **Figure 3** can be used to see where the least amount of habitat remains and if you compare it to **Table 1** you can see where harvest is greatest compared to available habitat. Most wildlife analysis areas (WAA) with less than 50% deep snow deer winter habitat have the highest harvest rates.

Conditions on the ground within the last few years have remained stable because of mild winters and later arrival of snow in Unit 2 allowing the deer to forage longer at altitude and in areas such as muskegs. Prolonged snowpack during a severe winter or within later stages of winter could have a greater effect on deer populations going forward since there is far less habitat available during those periods.

**Table 1:** Overall percent of historical habitat since 1954 (beginning of large scale logging) remaining by wildlife analysis area (WAA) in GMU 2 for deep snow deer winter habitat and all productive old growth, average harvest since 2005, and harvest trend.

WAA	Productive Old Growth	Deep Snow Deer Winter Habitat (HPOG below 800 feet on south facing slopes)	Average Reported Harvest by WAA since 2005 and trend
901	89	85	69 ↑
902	100	100	79 ↓
1003	51	49	46 ↑
1105	99	99	84 ↑
1106	100	100	25 ↓
1107	97	93	138 ↑
1108	99	99	17 ↑
1209	100	100	10 ↑
1210	99	99	50 ↑
1211	83	78	36 ↑
1213	99	99	21 ↑
1214	67	48	245 ↑
1315	55	29	350 ↑
1316	99	100	27 ↓
1317	56	23	145 ↑
1318	78	49	220 ↑
1319	74	61	229 ↓
1323	90	76	18 ↓
1332	80	72	76 →
1420	54	27	308 ↑
1421	71	44	107 ↓
1422	51	29	386 ↓
1525	51	40	21 ↑
1526	93	83	18 ↑
1527	67	61	23 ↓
1528	82	84	37 →
1529	55	46	144 ↓
1530	50	37	145 ↑
1531	55	49	37 ↓





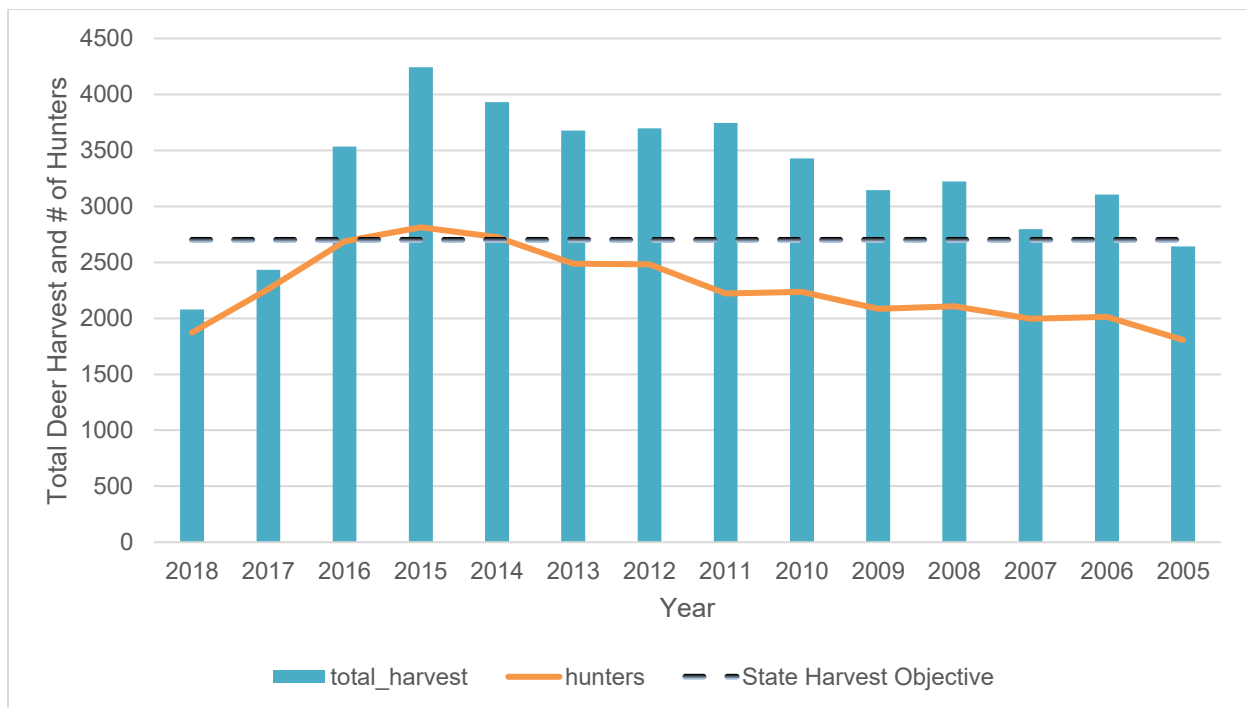
**Figure 3:** Map of Unit 2 showing deep snow deer winter habitat availability and where habitat is below 50% in WAAs. Note: WAA 5015 is not part of Unit 2.

### Harvest History

Harvest data reported below are provided by ADF&G (McCoy 2019b) and are gathered by several reporting systems including the Region 1 (Southeast Alaska) deer survey, Unit 2 deer harvest report, and the State-wide deer harvest report. The Region 1 deer survey is the most consistent report, covering the years 1997–2010 and is based on a sample of hunters. In general, 35% of hunters from each community were sampled annually and while response rates vary by community, the overall response rate across

communities was approximately 60% each year. Harvest numbers were extrapolated using expansion factors that are calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response was low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and interpreted with caution. Trends, however, should be fairly accurate, especially at larger scales. The Unit 2 deer report was in place from 2005–2010 and was instituted specifically for reporting deer harvest in Unit 2. In 2011, the statewide deer report replaced the other deer harvest reporting systems and requires reporting of harvest by all deer hunters. Different expansion factors are used for the various data sets so that total harvest estimates between years are comparable (McCoy 2013).

Action taken by the Alaska Board of Game in fall 2000 established a harvest objective of 2,700 deer for Unit 2 as they identified the population as important for satisfying high levels of human consumptive use (Bethune 2013). Estimated deer harvest in Unit 2 from 2005–2018 can be found in **Figure 4**. The estimated average total annual harvest is 3,467 deer. Harvests have been at or above ADF&G’s Unit 2 harvest objective from 2005-2016 and fell below harvest objectives during the 2017 and 2018 seasons. Deer harvest reached historically high levels in 2015 and then began to decline since. The same pattern can also be seen with hunter numbers participating in Unit 2 (**Figure 4**).



**Figure 4:** Total deer harvest and number of hunters during the 2005-2018 seasons in Unit 2 and showing the state harvest objective of 2,700 deer (McCoy 2019b).

Federally qualified subsistence users tend to harvest the most deer in Unit 2 which has ranged from 59%-71% of the total harvest during this period. This estimate may be significantly higher, as past testimony has suggested that some communities do not fully report harvests taken during the year (SEASRAC 2015;

SEASRAC 2017). The average number of deer harvested per hunter has remain stable for Unit 2 residents since 2005. The average number of days it takes to harvest a deer also appears to be stable for Unit 2 residents and is currently half what it was during the late 1990s (Bethune 2013). Recent harvest data supports the past pellet-group data, suggesting the deer population in Unit 2 is healthy and stable to increasing.

Prior to implementation of Federal regulations, opportunity to harvest female or antlerless deer was available under State regulations from 1955-1972. From 1973-1977, opportunity for female deer was still available, however, the harvest limit was reduced. During the 1987 season, the opportunity to harvest one female deer under State regulations was re-implemented, but did not get extended due to the unpopularity of the hunt in many local communities. Harvest data for these years are not available.

Although Federal regulations for hunting deer in Unit 2 started in 1991, the opportunity to harvest female or antlerless deer was not allowed until the 1995 season. Between 1998 and 2005, a Federal permit was required, however this requirement was removed with the establishment of first a unit-wide, then statewide harvest report attached to the deer harvest tickets. From 2001-2017, the reported female deer harvest in Unit 2 (**Table 1**) has ranged from 57 to 126 animals per year, with an overall annual average of 94 female deer. During this same period, the harvest of female deer has averaged only 3% of the total deer harvest (OSM 2019; McCoy 2019b). More recently, although the average reported female deer harvest increased to 101 since 2005, the female deer harvest percentage has actually decreased to 2.9% of the total reported deer harvest (McCoy 2019b).

**Table 2:** Female deer harvest compared to overall deer harvest, Unit 2 2001-2017 (McCoy 2019b)

Regulatory year	Female deer harvest	Total deer harvest	Percent of harvest (female)
2001	109	2775	3.9
2002	57	2054	2.8
2003	56	1747	3.2
2004	63	2008	3.1
2005	103	2642	3.9
2006	90	3105	2.9
2007	87	2795	3.1
2008	112	3222	3.5
2009	107	3145	3.4
2010	88	3428	2.6
2011	106	3746	2.8
2012	96	3696	2.6
2013	77	3677	2.1
2014	119	3931	3.0
2015	96	4243	2.3
2016	84	3534	2.4
2017	79	2433	3.2
<b>Average</b>	<b>90</b>	<b>3069</b>	<b>3.0</b>

The opportunity to harvest up to five deer did not begin under Federal regulations until the 2006 regulatory season. Harvest data derived from Unit 2 harvest reports suggests that the percentage of Federally qualified subsistence users harvesting a season’s harvest limit is very small and is comprised primarily of Unit 2 residents. A breakdown of percentage of Federally qualified subsistence users and the number of deer harvested can be found in **Table 2** (McCoy 2019b).

**Table 3:** Percentages of hunters by number of deer reported harvested from 1997-2017 (McCoy 2019b).

Hunter Type	No deer	1 deer	2 deer	3 deer	4 deer	5 deer*
<b>Unit 2 Residents</b>	24.5%	28.3%	19.7%	13.8%	11.6%	2%
<b>Other Federally qualified</b>	32.7%	28.4%	24.3%	8.6%	5.9%	0.4%

\*Federal regulations allowed for harvest of a fifth deer beginning in 2006.

The small percentage of Federally qualified subsistence users harvesting a full limit of five deer is not necessarily an indicator of a low deer population. This could be a result of multiple hunters from the same household harvesting deer, thus reducing the burden on an individual hunter to harvest a full harvest limit.

**Effects of the Proposal**

If adopted, this proposal would reduce the harvest limit for Federally qualified subsistence users hunting deer on Federal public lands in Unit 2. Adoption of this proposal aligns State and Federal regulations regarding the maximum number of deer allowed to be harvested in Unit 2 which reduces regulatory complexity.

While a reduction in the harvest limit may appear to make more deer available, the percentage of Federally qualified subsistence users harvesting five deer is so low that the resulting amount of deer available would be negligible. During the 2015 regulatory season, when reported harvests in the unit were the highest, it is estimated that 1050 hunters residing in Unit 2 communities participated in the deer hunt. With an average of 3% of Unit 2 residents harvesting the five deer harvest limit since 2006, this equates to a total of 32 hunters harvesting a fifth deer during the 2015 regulatory season making 32 additional deer available. Unit harvest data of female deer during this same period averages 2.9% of the total harvest. If the harvest limit was reduced to four deer, of the 32 deer made available, only one female would potentially be available to contribute to future breeding. With the number of available female deer this low, there would not be any positive affect on rebuilding Unit 2 deer numbers with this regulatory change.

**OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP20-07.

## Justification

Reducing the harvest limit for Federally qualified subsistence users in Unit 2 is not necessary for conservation or for the continuation of meeting subsistence needs. Although recent deer harvest trends in Unit 2 are lower than previous years, recent harvest numbers are close to the harvest objective for the unit established by the Alaska Board of Game in 2000. In 2006, the Board justified increasing the harvest limit as data suggested the Unit 2 deer population was stable. Current harvest levels are very similar to those just prior to that regulatory change.

Recent harvest data indicates the number of hunters in Unit 2 has also declined, which may have a direct correlation to the drop in harvest. Harvest data have not shown dramatic decreases in deer per hunter, nor dramatic increases in hunt days per deer for Federally qualified subsistence users. Hunt performance and deer pellet monitoring data suggest the deer population in Unit 2 is currently stable.

While reducing the harvest limit could make more deer available for reproduction, the resulting amount of deer would be negligible. With the majority of harvest being male deer, there is no guarantee of improved reproductive success as a result of the proposed change as deer populations in the unit are more greatly affected by habitat and winter weather conditions than by harvest.

The Craig District Ranger has delegated authority from the Board to close or reopen Federal seasons or to adjust harvest and possession limits for deer in Unit 2. As intended by the Board when approving the harvest limit increase, the Federal in-season manager can take action during times of conservation concern.

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## WRITTEN PUBLIC COMMENTS

Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room

- I. Call to Order: 5:40pm by Matt Allen, Secretary
- II. Roll Call: 8 voting members present, 1 via phone  
Members Present: Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
Members Absent (Excused): Doherty, McQuarrie, Skan, Franulovich, Miller  
Members Absent (Unexcused):  
Number Needed for Quorum on AC: 8  
List of User Groups and Public Present: Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
Motion: Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. Approval of Agenda:  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. Approval of Previous Meeting Minutes:  
Previous meeting minutes incomplete at this time
- V. Fish and Game Staff Present:  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. Guests Present: Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. Chairman Report: Allen read co-chair letter from Scoblic/Doherty
- VIII. ADF&G Sportfish Report: Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. Old Business:  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. New Business:  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

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Ketchikan Advisory Committee Page 1/3



Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_  
 Minutes Approved By: \_\_\_\_\_  
 Date: \_\_\_\_\_

## APPENDICES

## Appendix 1: Regulatory framework of State and Federal deer seasons by year since 1925

Year	Type of Season	Season	Limit	Conditions & Limitations
1925	Open	Sept 15-Dec 16	3	Buck, 3" antlers or longer
1925-1929	Open	Sept 1-Nov 30	3	Buck, 3" antlers or longer
1930-1941	Open	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Resident	Sept 16-Nov 15	2	Buck, 3" antlers or longer
1942-1943	Non-resident	Sept 16-Nov 15	1	Buck, 3" antlers or longer
1944-1948	Resident	Sept 1-Nov 7	2	Buck, 3" antlers or longer
1944-1948	Non-resident	Sept 1-Nov 7	1	Buck, 3" antlers or longer
1949	Resident	Sept 1-Nov 15	2	Buck, 3" antlers or longer
1949	Non-resident	Sept 1-Nov 15	1	Buck, 3" antlers or longer
1950-1951	Resident	Aug 20-Nov 15	2	Buck, 3" antlers or longer
1950-1951	Non-resident	Aug 20-Nov 15	1	Buck, 3" antlers or longer
1952	Open	Aug 20-Nov 22	2	Buck, 3" antlers or longer
1953-1954	Open	Aug 20-Nov 22	3	Buck, 3" antlers or longer
1955	Open	Aug 20-Nov 22	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 15-Nov 22
1956	Open	Aug 20-Nov 26	3	3 bucks or 2 bucks and one antlerless, bucks 3" antlers or longer, antlerless may be taken Nov 13-Nov 26
1957-1959	Open	Aug 20-Nov 30	4	4 deer, does may be taken Oct 15-Nov 30
1960	Open	Aug 20-Dec 15	4	4 deer, does may be taken Oct 15-Nov 30
1961	Open	Aug 20-Nov 30	4	4 deer, antlerless deer may be taken Sept 15-Nov 30

<b>Year</b>	<b>Type of Season</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions &amp; Limitations</b>
<b>1962</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1963-1967</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1968</b>	Open	Aug 1-Dec 15	4	4 deer, antlerless deer may be taken Sept 15-Dec 15
<b>1969-1971</b>	Open	Aug 1-Dec 31	4	4 deer, antlerless deer may be taken Sept 15-Dec 31
<b>1972</b>	Open	Aug 1-Dec 31	3	3 deer, antlerless deer may be taken Nov 1-Nov 30
<b>1973-1977</b>	Open	Aug 1-Nov 30	3	1 antlerless deer may be taken Nov 1-Nov 30
<b>1978-1984</b>	Open	Aug 1-Nov 30	3	Antlered deer
<b>1985-1986</b>	State General	Aug 1-Nov 30	3	Antlered deer
<b>1987</b>	State General	Aug 1-Nov 30	4	1 antlerless deer may be taken Oct 10-Oct 31
<b>1988-2018</b>	State General	Aug 1-Dec 31	4	Antlered deer/bucks
<b>1991-1994</b>	Federal Subsistence	Aug 1-Dec 31	4	Antlered deer
<b>1995-1997</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken only during Oct 15-Dec 31
<b>1998-2002</b>	Federal Subsistence	Aug 1-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2003-2005</b>	Federal Subsistence	July 24-Dec 31	4	No more than one may be an antlerless deer, antlerless deer may be taken Oct 15-Dec 31 by Federal registration permit only
<b>2006-2009</b>	Federal Subsistence	July 24-Dec 31	5	No more than one may be an antlerless deer; antlerless deer may be taken Oct 15-Dec 31

Year	Type of Season	Season	Limit	Conditions & Limitations
2010-2015	Federal Subsistence	July 24-Dec 31	5	No more than one may be a female deer; female deer may be taken Oct 15-Dec 31

**Appendix 2:** History of Federal regulatory actions related to deer in Unit 2 taken by the Federal Subsistence Board

Proposal number	Reg Year	FSB action	Proposal request
P95-01	1995	Adopt w/ mod to require harvest report requirement	Create an antlerless season in Unit 2
R95-09	1995	Reject	Requested rescinding antlerless deer season created by adoption of P95-01
P97-07	1997	Reject	Reduce deer season from Aug. 1-Dec. 31 to Sept. 1-Dec. 31, and eliminate harvest of antlerless deer in Unit 2.
P98-09	1998	Reject	Eliminate antlerless season
P98-10	1998	Reject	Eliminate antlerless season and apply antler restriction of forked horn or larger
P98-11	1998	Reject	Shorten deer season from Sept 1 -Nov. 30
P98-12	1998	Reject	Eliminate antlerless season
P00-005	2000	Reject	Eliminate antlerless season
P00-05	2000	Reject	Eliminate antlerless deer season
P00-06	2000	Reject	Community harvest permit request of 500 deer per Unit 2 community
WP01-03	2001	Reject	Eliminate antlerless deer season
WP02-08	2002	Reject	Request increase of deer harvest limit for Unit 2 residents and reduction for Unit 1A and 3 residents
WP02-09	2002	Took no action	Restrict non-Federally qualified users from hunting on Federal lands between Aug. 1-31 and Oct. 16-Nov. 14
WRFR02-01	2002	Reject	Requested reconsideration of the Board rejecting WP02-09 to close Federal lands in Unit 2.
WP03-04	2003	Adopt with modification adding one week in July at front of season (July 24-31)	Requested earlier extension of deer season for Federally qualified users

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP03-05</b>	2003	Adopt with modification restricting non-Federally qualified users from Aug 1-21 on Federal Public Lands on Prince of Wales Island (closure for 1 year)	Requested closure of Federal public lands from Aug 1-Sept. 1 and reduction of harvest limit to 2 deer for non-Federally qualified subsistence users.
<b>WP04-03</b>	2004	Took no action	Requested closure be changed from Aug 1-21 to Oct. 16-Nov. 14 and reduction of harvest limit for non-Federally qualified users
<b>WP04-04</b>	2004	Took no action	Requested antlerless deer season be modified from Oct. 15-Dec. 31 to Aug. 1-Sept. 15
<b>WP04-05</b>	2004	Took no action	Requested closure to non-Federally qualified users be reduced by one week
<b>WP04-06</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-07</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-08</b>	2004	Took no action	Requested elimination of August closure to non-Federally qualified users.
<b>WP04-09</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with antler restrictions for non-Federally qualified users.
<b>WP04-10</b>	2004	Took no action	Requested removal of the antlerless deer season and the July 24 start date for subsistence users and to replace closure with a 3 buck harvest limit for non-Federally qualified users.
<b>WP04-11</b>	2004	Took no action	Requested removal of the July 24 start date for subsistence users and to modify closure from Aug. 1-21 to Oct. 16-Dec. 31 and implement a 2 buck harvest limit for non-Federally qualified users.
<b>WP04-12</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-Jan. 31 for subsistence users and modified the August closure to the month of January to all but Unit 2 residents

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP04-13</b>	2004	Took no action	Requested modifying Federal season from July 24-Dec. 31 to Aug. 1-10 and removing the antlerless deer season for subsistence users and reducing the August closure from Aug. 1-10 for non-Federally qualified users.
<b>WP04-14</b>	2004	Took no action	Reduce deer season from July 24-Dec. 31 to Aug. 1-Dec. 31 for Federally qualified users in Unit 2.
<b>WP04-15</b>	2004	Adopt with modification restricting non-Federally qualified users from Aug 1-15 on Federal Public Lands on Prince of Wales Island	Requested continuation of the one year closure as passed by the FSB during the 2003 regulatory cycle.
<b>WP05-04</b>	2005	Adopt with modification removing registration requirement, but required use of a joint State/Federal harvest report as recommended by the Unit 2 Deer Subcommittee	Requested that all hunters obtain a Federal registration permit to hunt deer in Unit 2.
<b>WP06-06</b>	2006	Reject	Requested removing sequential use of harvest tickets and possession of all unused harvest ticket requirements.
<b>WP06-07</b>	2006	Took no action	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-08</b>	2006	Adopt with modification. Modifications included: 1) removal of the August closure on SE portion of Prince of Wales Island; 2) rejected closure to non-Federally qualified users on Suemez Island; and 3) rejected a closure to non-Federally qualified users on the islands located along the SW coast of Prince of Wales Island.	Requested expansion of closure area to non-Federally qualified users.
<b>WP06-09</b>	2006	Adopt with modification. The Board modified the Council recommendation by eliminating the need to have a Federal permit for harvesting a 5th deer. The Board also delegated the Forest Supervisor the ability to lower the harvest limit to 4 deer if needed.	Requested increasing the deer harvest limit to 6 deer.
<b>WP06-10</b>	2006	Reject	Requested use of harvest ticket #1 to record harvest of a female deer.
<b>WP07-07</b>	2007	Reject	Requested either elimination of antlerless deer hunt or to only allow for antlerless deer harvest every other year.
<b>WP10-19</b>	2010	Reject	Requested modification of female deer season from Oct. 15-Dec. 31 to Sept. 15-Oct. 15
<b>WP10-20</b>	2010	Reject	Requested modification of the non-Federally qualified closure from Aug. 1-15 to July 24-31.

<b>Proposal number</b>	<b>Reg Year</b>	<b>FSB action</b>	<b>Proposal request</b>
<b>WP10-22</b>	2010	Adopt with modification. The modification provided delegations to the ten USFS District Rangers via letter and was to apply only to wildlife. Any fish delegation requests would have to be submitted to the Board.	The delegated in-season management for wildlife on a species by species basis, by letter, to the ten District Rangers located in Units 1-5
<b>WSA11-01</b>	2011	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP12-08</b>	2012	Adopted	To rescind requirement of joint State/Federal harvest report
<b>WP14-03</b>	2014	Reject	Eliminate antlerless deer season
<b>WP14-04</b>	2014	Reject	Request early start date for Federally qualified users over 60 or disabled.
<b>WP16-01</b>	2016	Adopt with mod adding January season, but rejected non-qualified harvest reduction	Requested non-Federally qualified users be restricted to two deer and extension season closing date from Dec. 31 to Jan. 31
<b>WP16-05</b>	2016	Adopted	Requests the language stating the Unit 2 deer harvest limit may be reduced to four deer in times of conservation be removed
<b>WP16-08</b>	2016	Adopted	Requests deer harvest ticket #5 be validated out of sequence to record female deer taken in Unit 2.
<b>WP18-01</b>	2018	Adopt w/ mod to accept harvest limit restriction but oppose season reduction	Limit harvest to two deer from Federal public lands the reduce season by one week or more for non-Federally qualified subsistence users
<b>WP18-02</b>	2018	Adopted	Requested modification of deer C&T for Units 1-5 to all rural residents of Units 1-5.



<b>WP20-08 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-08 requests implementing a statewide requirement that traps and snares be marked with either the trapper's name or State identification number. <i>Submitted by: East Prince of Wales Advisory Committee.</i>
<b>Proposed Regulation</b>	<b>Statewide— Trapping (General Provisions)</b>  <i>Traps or snares must be marked with trapper's name or state identification number (Alaska driver's license number or State identification card number).</i>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	
<b>Bristol Bay Subsistence Regional Advisory Council Recommendation</b>	
<b>Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation</b>	
<b>Western Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	

<b>WP20–08 Executive Summary</b>	
<b>Northwest Arctic Subsistence Regional Advisory Council Recommendation</b>	
<b>Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>North Slope Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Support, 1 Oppose</b>

## **DRAFT STAFF ANALYSIS WP20-08**

### **ISSUES**

Wildlife Proposal WP20-08, submitted by the East Prince of Wales Fish and Game Advisory Committee, requests implementing a statewide requirement that traps and snares be marked with either the trapper's name or State identification number.

### **DISCUSSION**

The proponent believes that current regulations do not allow for accountability if a trapper leaves their traps out and set after the close of the season, or chooses to use illegal baits (i.e., whole chunks of deer meat or whole migratory birds). The proponent believes requiring trap identification (Alaska issued driver's license number or personal identification number) would make enforcement easier and may prevent these issues. Clarification with the proponent indicated that the proposed marking requirement is to apply Statewide.

#### **Existing Federal Regulation**

There are no statewide trap marking requirements under Federal regulations.

#### **Proposed Federal Regulation**

##### **Statewide— Trapping (General Provisions)**

*Traps or snares must be marked with trapper's name or state identification number (Alaska driver's license number or State identification card number).*

#### **Existing State Regulation**

There are no statewide trap marking requirements under State regulations.

#### **Extent of Federal Public Lands/Waters**

Alaska is comprised of 65% Federal public lands and consist of 23% Bureau of Land Management (BLM) managed lands, 21% U.S. Fish and Wildlife Service (USFWS) managed lands, 15% National Park Service (NPS) managed lands, and 6% U.S. Forest Service (USFS) managed lands.

## Customary and Traditional Use Determinations

Customary and traditional use determinations for specific areas and species are found in subpart C of 50 CFR 100, § \_\_\_.24(a)(1) and 36 CFR 242 § \_\_\_.24(a)(1).

## Regulatory History

The Alaska Board of Game (BOG) adopted a marking requirement for traps and snares in Units 1–5 in 2006. Federal regulations were aligned with the State requirements in Units 1–5 when the Federal Subsistence Board (Board) adopted Proposal WP12-14 in 2012. The rationale of the Board was that the BOG adopted trap marking requirements for Units 1-5 in 2006 in response to concerns by Alaska Wildlife Troopers, the Alaska Department of Fish and Game (ADF&G), and members of the public, that trapping as a whole would benefit from having some way of identifying ownership of traps and snares. This was prompted by incidences of traps being placed in areas where trapping was not allowed, pets being caught in traps, and unattended snares still capable of capturing a passing deer, bear, or wolf, being found following the close of season (FSB 2012).

The Southeast Alaska Subsistence Regional Advisory Council (Council) expressed concern that there was a lack of evidence why traps should be marked in either State or Federal regulations, and stated that regulations should be adopted for a good reason and not because of “*one bear caught in a snare, set by an unknown person for an unknown reason*”. However, the Council supported the proposal, stating the benefit of aligning Federal and State regulations, and reducing the uncertainty about whether current regulations required traps to be marked (SEASRAC 2011).

In 2014, the Board considered Proposal WP14-01, requesting new statewide Federal provisions requiring trapper identification tags on all traps and snares, the establishment of a maximum allowable time limit for checking traps, and establishment of a harvest/trapping report form to collect data on non-target species captured in traps and snares. The proposal analysis indicated statewide application would be unmanageable, would require substantial law enforcement and public education efforts, and could cause subsistence users to avoid the regulation by trapping under State regulations. The proposal was unanimously opposed by all ten Federal Subsistence Regional Advisory Councils, ADF&G, and the public as reflected in written public comments. The Board rejected the proposal as part of its consensus agenda (FSB 2014).

In March 2016, the BOG removed trap marking requirements in response to Proposal 78. The BOG determined that trappers are generally responsible and that the 2006 regulation was not addressing the reasons why it was implemented, noting that marking traps does not prevent illegal trapping activity or prevent dogs from getting trapped.

In 2018, the Board considered Proposal WP18-13, requesting removal of the trap marking requirement in Units 1-5. The proposal was submitted to remove an unnecessary and burdensome requirement on Federally qualified subsistence users and to realign State and Federal regulations. While ADF&G was neutral on the proposal, it was unanimously supported by the Council (SEASRAC 2017). The proposal was adopted by the Board as part of its consensus agenda (FSB 2018).

## **Current Events Involving the Species**

Wildlife proposal WP20-20 has been submitted requesting that trap sites be marked with brightly colored surveyor's tape in plain view on a nearby tree or overhanging branch in Unit 7.

## **Effects of the Proposal**

The proposal will not result in any positive or negative effects to furbearer or other non-furbearer wildlife populations.

If the proposal is adopted, Federally qualified subsistence users trapping under Federal regulations throughout the State will be required to mark traps and snares with identification tags. The proposed requirement could potentially benefit law enforcement by allowing easier identification of traps and snares set in the field. However, differences in land ownership, population concentrations, terrain, and habitats would limit the effectiveness of the proposed statewide regulation. Individual traplines can span across Federal and State managed lands and, therefore, could have different regulatory requirements along the line. Alternatively, Federally qualified subsistence users could simply choose to trap under State regulations and avoid the proposed requirement, as both Federal and State trapping regulations are applicable on most Federal public lands, as long as the State regulations are not inconsistent with or superseded by Federal regulations, or unless Federal lands are closed to non-Federally qualified users.

Within portions of Unit 15, over 60 percent which lies within Kenai National Wildlife Refuge, and those portions of Unit 7 that are contained within Kenai NWR, a trapping permit is required and a stipulation of Kenai NWR's permit includes the marking of traps and snares. Also, under State regulations, all snares within a quarter mile of a public road in Units 12 and 20E are required to be marked. Federally qualified subsistence users trapping on Federal public lands outside of these specific areas would be required to mark traps and snares with identification tags that include the trapper's name and license number. However, Federally qualified subsistence users trapping on Federal public lands would not be required to mark traps and snares under State regulations.

The requirement to mark traps and snares would also result in additional burden and cost for Federally qualified subsistence users trapping under Federal subsistence regulations. Copper tags stamped with a trapper's identification information, including fasteners, cost approximately \$26 per 100 tags (including shipping) or less (approximately \$15–\$20) for "write-your own" tags (FWS 2012). In addition, trappers often trade or borrow equipment from family members or friends, and changes of identification tags on large numbers of traps or snares would require significant effort (FWS 2014).

Re-implementation of a mandatory requirement to mark traps under Federal regulations creates unnecessary divergence of State and Federal regulations, which may create confusion for Federally qualified subsistence users. Although adoption of the proposal could allow law enforcement to more easily identify trappers that have traps deployed outside the open season or have otherwise violated regulations, mandatory trap marking does not necessarily prevent illegal trapping activity or prevent dogs from getting trapped. Also, adoption of this proposal will not affect State regulations, which would allow Federally qualified subsistence users to operate traps under State regulations to avoid this requirement.

## **OSM PRELIMINARY CONCLUSION**

**Oppose** Proposal WP20-08.

### **Justification**

Requiring Federally qualified subsistence users to mark traps is an unnecessary burden, as mandatory marking does not prevent illegal trapping activity. With State regulations being less restrictive, Federally qualified subsistence users could avoid the requirement by trapping under those regulations, essentially rendering a Federal marking requirement unenforceable. There is no anticipated conservation concern to furbearers with opposing this proposal, as there is no established correlation between furbearer harvest levels and trap marking requirements. Adoption of this proposal also creates unnecessary divergence between State and Federal regulations.

## **LITERATURE CITED**

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FSB. 2018. Transcripts of Federal Subsistence Board proceedings, April 11-13, 2018. Office of Subsistence Management, USFWS. Anchorage, AK.

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FWS. 2014. Staff Analysis WP14-01. Pages 352-367 in Federal Subsistence Board Meeting Materials April 15-17, 2014. Office of Subsistence Management, USFWS. Anchorage, AK. 628 pages.

SEASRAC. 2011. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council, September 27-29, 2011 in Wrangell, Alaska. Office of Subsistence Management, USFWS. Anchorage, AK.

SEASRAC. 2017. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council, October 31-November 2, 2017 in Juneau, Alaska. Office of Subsistence Management, USFWS. Anchorage, AK.

## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		



Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

June 25, 2019

TO: Federal Board of Subsistence Management, (Att:  
Theo Mutskowitz)

FROM: Alaskans FOR Wildlife and any Cooperating  
Entities

RE: Comments on Subsistence Proposals

Please consider these comments on numbered proposals. Comments are offered from a public perspective that reflects several major considerations which we earnestly wish you and the board to keep clearly in mind as you make decisions on these and all proposals offered, namely,

- 1) The lands in question are publically owned lands belonging to all US citizens who in theory and in law all have interest in how wildlife on these lands are managed, and
- 2) Article 8 of our Alaska Constitution clearly sets forth that ALL (emphasis) Alaskans are stakeholders, all essentially owners, with respect to its natural resources and how they are managed .

WP-20 Wolf Trapping lifting harvest restrictions and extending sealing time.

OPPOSE

-2-

This proposal leads to spreading unrestricted wolf take everywhere. Given especially the substantial science on the value of apex predators plus the high interest in sustaining wolf populations on American public lands including here in Alaska as essential to maintenance of ecosystem biodiversity, we maintain that enactment of this proposal would result in another chapter in the unscientific overall continued war on wolves. This proposal to lift harvest limits and to extend sealing limits also already excessive in length are not scientifically justified nor justified as a public matter given the overall value of wolves to maintenance of biodiversity. It must not pass.

WP20-17 – Removing harvest quotas and sealing requirements for hunting wolves, OPPOSE.

We oppose this proposal for the same reasons offered to oppose the previous proposal, WP20-16.

The values of wolves as apex predator and its place in American culture must have bearing upon this consideration. No science and no national or even Alaskan public cultural norms can possibly support this permissively reckless proposal to expand wolf take without bounds. It must not pass.

-3-

WP20-26 Permitting the use of snowmachines to “position” wildlife for harvest. OPPOSE

This proposal would expand this practice apparently from other land management units. In essence “positioning” is another term for what in reality will result in chasing, and harassing wildlife to exhaustion, prohibitions in the regulation notwithstanding, due to impossible enforcement limitations. As an example, when asked to explain existing regulations for snowmachine use in trapping and hunting, an Alaska wildlife trooper explained he does not even understand the regulation.

Expanded snowmachine use, “positioning,” will amount to a continued enforcement challenge. Widespread abuse will surely result and will continue to give subsistence the reputation of abuse when it really needs public support: we feel that as we now face mass extinctions of wildlife species; there is new public and growing focus on the crisis. This is an extremely unwise plunge to the bottom and we caution a futuristic consideration.

WP20-08 Proposal to require traps and snares to be marked with name and state identification number.

SUPPORT This proposal is topical, even in urban municipalities of Alaska as conflicts in public use areas resulting in injuries to hikers, pets and other outdoor public land users rise .

Keeping in mind even the use of more remote public lands grows as outdoor users of their lands increase, the potential for conflicts including serious injuries resulting from hidden owner-unidentified traps will increase. Organized trappers have strongly opposed such requirements as proposed here in past requests for change considered by the Alaska Board of Game. We witness the public land users (including of federal lands) would most certainly strongly favor this accountability. We strongly favor this proposal.

In closing, please carefully consider these comments as you go forward with the process over the next year or so. WE thank you for your consideration of these comments.

Sincerely,  
Jim Kowalsky,  
Chair, Alaskans FOR Wildlife  
PO Box 81957  
Fairbanks, Alaska 99708  
907-488-2434

<b>WP20–09 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-09 requests that the trapping season for beaver be extended in Units 1-5. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Units 1, 2, 3 except Mitkof Island and Unit 4 – Beaver (trapping)</b></p> <p><i>No limit</i> <span style="float: right;"><del>Dec. 1 – May 15</del> <b>Nov. 10 – May 15</b></span></p> <p><b>Unit 3 Mitkof Island – Beaver (trapping)</b></p> <p><i>No limit</i> <span style="float: right;"><del>Dec. 1 – Apr. 15</del> <b>Nov. 10 – May 15</b></span></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

**DRAFT STAFF ANALYSIS  
WP20-09**

**ISSUES**

Wildlife Proposal WP20-09, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that the trapping season for beaver be extended in Units 1-5.

**DISCUSSION**

Because there would be no change to Unit 5 if this proposal is adopted, discussions relative to Unit 5 will be limited throughout the rest of the analysis.

The proponent states that adoption of this proposal will increase beaver harvest opportunity in Units 1-4 for Federally qualified subsistence users, and align the Federal season with the State season, which was recently extended by the Alaska Board of Game (BOG). Beaver populations throughout Southeast Alaska are healthy so no conservation concerns are anticipated with extending the season. There will be no change in Unit 5 as the current Federal trapping season is in alignment with the proposed dates. The proponent also states that adoption of this proposal is not expected to impact any other users.

**Existing Federal Regulation**

**Units 1, 2, 3 except Mitkof Island and Unit 4 – Beaver (trapping)**

*No limit*

*Dec. 1 – May 15*

**Unit 3 Mitkof Island – Beaver (trapping)**

*No limit*

*Dec. 1 – Apr. 15*

**Proposed Federal Regulation**

**Units 1, 2, 3 except Mitkof Island and Unit 4 – Beaver (trapping)**

*No limit*

~~*Dec. 1 – May 15*~~  
*Nov. 10 – May 15*

### **Unit 3 Mitkof Island – Beaver (trapping)**

*No limit*

~~*Dec. 1 – Apr. 15*~~  
*Nov. 10 – May 15*

### **Existing State Regulation**

*Beaver must be sealed within 30 days of the close of the season.*

### **Unit 1-4 – Beaver (trapping)**

*No limit*

*Nov. 10 – May 15*

### **Extent of Federal Public Lands/Waters**

Unit 1 is comprised of approximately 86% of Federal public lands and consist of 69% U.S. Forest Service (USFS), 17% National Park Service (NPS), and less than 1% Bureau of Land Management (BLM) managed lands (**see Unit Map**).

Unit 2 is comprised of approximately 72% of Federal public lands and consist of 72% USFS and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (**see Unit Map**).

Unit 3 is comprised of approximately 90% of Federal public lands and consists entirely of USFS managed lands (**see Unit Map**).

Unit 4 is comprised of approximately 92% of Federal public lands and consists of 92% USFS and less than 1% BLM managed lands (**see Unit Map**).

### **Customary and Traditional Use Determinations**

The Federal Subsistence Board has not made a customary and traditional use determination for beaver in Units 1-4. Therefore, all Federally qualified subsistence users may harvest beaver in these units.

### **Regulatory History**

In 2007, the Council submitted Proposals WP07-09 and WP07-10 to establish and/or realign trapping seasons in Units 1D and 4 for beaver following BOG action in November 2006. The Council supported WP07-09 with modification to specify harvest dates of Dec. 1 – May 15 and supported WP07-10 as written (SEASRAC 2007). The Federal Subsistence Board (Board) adopted both proposals (WP07-10 to open the beaver trapping season in Unit 4 west of Chatham Strait as written and WP07-09 as modified by the Council) as consensus agenda items (FSB 2007).



The NPS prohibits the use of firearms to take free-ranging furbearers under a trapping license. This practice is prohibited in Alaskan National Parks, Monuments, and Preserves as a result of two sets of regulations: the definition of a trap as "*a snare, trap, mesh, or other implement designed to entrap animals others than fish*" (36 CFR § 13.1), NPS-wide regulations that define trapping as "*taking or attempting to take wildlife with a trap*" (36 CFR § 1.4).

Federal trapping regulations in Units 1-5 were adopted from the State trapping regulations at the time Federal management began. Although trapping regulations typically allow trappers to harvest furbearers with a firearm, harvesting beaver in southeast Alaska with this method had been prohibited. In 2016, the Council submitted Proposal WP16-07 requesting that firearms be allowed under trapping regulations to harvest beaver in Units 1-5. The Board adopted the proposal with modification to allow firearms to be used to take beaver under a trapping license under an open beaver season, except on NPS lands (FSB 2016).

Under State regulations, prior to regulatory year 2011/2012, the beaver trapping season was Dec. 1- May 15 in most of the Southeast Region (Mitkof Island Dec. 1-April 15 and Unit 5 Nov. 10-May 15). At the November 2010 BOG meeting, the Alaska Department of Fish and Game (ADF&G) brought Proposal 29 before the BOG to change the opening date for beaver trapping in Units 1-5 to Nov. 10. The rationale for this proposal was that beaver populations were believed to be healthy, and the increased season length would reduce nuisance permits and allow additional opportunity. Proposal 29 was adopted with modification and the season start date was changed to Nov. 10; the modification was to move the season ending date to April 30<sup>th</sup> due to concerns over pelt quality and for protection of kits.

Proposal 11 was submitted to the BOG for the 2018/2019 season, requesting that the trapping season for beaver be extended to Nov. 10 – May 15 for Units 1-5. The rationale from the proponent was to return the closure date to the previous closure date of May 15. The BOG adopted this proposal during their January 11-15, 2019 meeting in Petersburg (ADF&G 2019a), based on the rationale that beaver are generally abundant and underutilized, low additional harvest is expected, provides the opportunity for fresh meat in the spring, and no public concerns.

### **Biological Background**

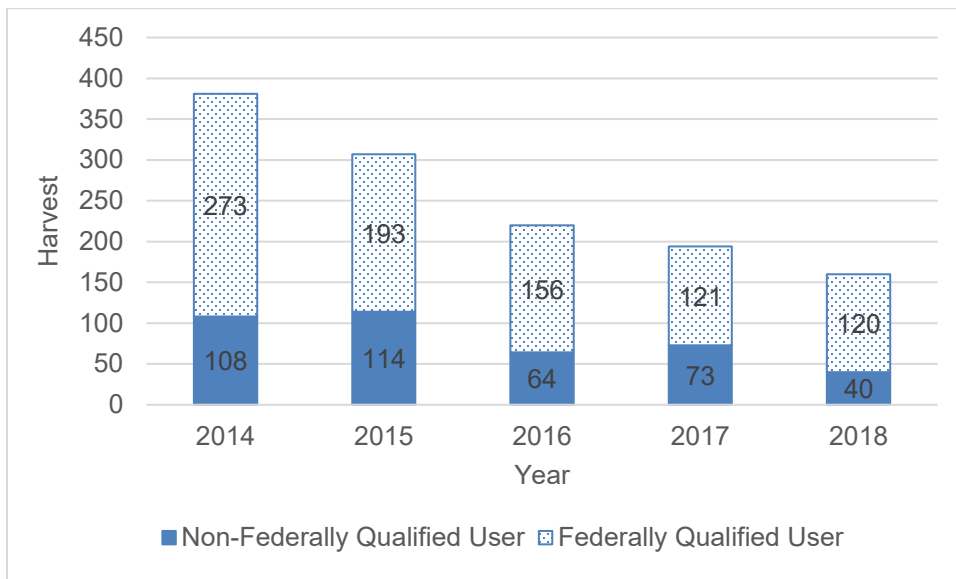
Beaver occur in the forested wetland areas of Alaska and are considered to be common and abundant throughout the state (ADF&G 2015). Little information is available for Unit 1A; however, due to low pelt prices, harvest is low in this unit (Porter 2013). Beaver are reported to be common to abundant in Unit 1B (Lowell 2013). In Unit 1C, beavers exist at moderate levels in most drainages with suitable habitat along the coastal mainland, as well as some of the larger islands. Furbearer populations in this unit, including beaver, appear stable (Scott 2013). Nuisance beaver harvest increased in Unit 1C during the 2012-2017 report period (Churchwell 2019). In Unit 1D, beavers were once considered scarce but now appear to be widely distributed and fairly abundant in the Unit (Sell 2013).

The beaver population in Unit 2 is thought to be high. Low levels of predators, low interest in trapping due to low pelt prices, and increasing amounts of second growth timber are all factors which may be influencing the population (Bethune 2013).

Most Unit 3 furbearer populations, including beaver, appear to be abundant or common and stable. Trapping is moderate throughout the unit, and higher near communities with established road systems. Large roadless portions of the unit likely remain untrapped. However, trapping access is improving due to increasing timber harvest and associated road densities, reducing furbearer’s refugia and making them more vulnerable to overharvest (Lowell 2014). Beaver occur in limited areas of Unit 4 (Mooney 2013).

**Harvest History**

Average annual harvest of beaver for Units 1-4 was 252 for 2014-2018 (Schumacher 2019). Federally qualified subsistence users accounted for 68% of the harvest during this time period (Figure 1). Harvest level varies and is more a function of trapper interest, weather conditions, access, fuel prices, and fur prices rather than abundance (Bethune 2013, Lowell 2013, Porter 2013, Scott 2013). Low pelt prices may be contributing to low harvest in recent years (Bethune 2013, Porter 2013).



**Figure 1.** Beaver trapping harvest in Units 1-4, 2014-2018 (Schumacher 2019).

**Effects of the Proposal**

If this proposal is adopted, Federally qualified subsistence users would have additional opportunities to harvest (trap) beaver in Units 1-4, and the State and Federal seasons would be aligned, which reduces regulatory complexity and user confusion. ADF&G anticipates the annual beaver harvest to increase approximately 5% as a result of adoption of the State season extension (ADF&G 2019b); however, since Federally qualified subsistence users can currently trap under State regulations during the extended State season, adoption of this proposal is not expected to result in any additional harvest. Furthermore, beaver

populations are considered healthy through Units 1-4; therefore, adoption of this proposal is not expected to cause a conservation concern.

## OSM PRELIMINARY CONCLUSION

Support Proposal WP20-09.

### Justification

Adoption of this proposal would provide additional harvest opportunities for Federally qualified subsistence users in Units 1-4, and align State and Federal trapping regulations for beaver. Adoption of this proposal is not expected to cause a conservation concern.

## LITERATURE CITED

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<b>WP20–10 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-10 requests a customary and traditional use determination for black bears in Units 1, 2, 3, and 5 by rural residents of Units 1 through 5. <i>Submitted by: Southeast Alaska Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<p><b>Customary and Traditional Use Determination—Black Bear</b></p> <p><i>Units 1, 2, 3, and 5    Rural residents of Units 1–5</i></p> <p><i>Unit 1A, 1B, and 1D    All rural residents</i></p> <p><i>Unit 1C    Rural residents of Units 1C, 1D, 3, and Hoonah, Pelican, Point Baker, Sitka, and Tenakee Springs</i></p> <p><i>Units 2 and 3    All rural residents</i></p> <p><i>Unit 5    Rural residents of Unit 5A</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Oppose</b>

**DRAFT STAFF ANALYSIS  
WP20-10**

**ISSUES**

Proposal WP20-10, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), is a request for the Federal Subsistence Board (Board) to recognize customary and traditional uses of black bears in Units 1, 2, 3, and 5 by rural residents of Units 1 through 5.

**DISCUSSION**

The Council states that customary and traditional use determinations carried over from State management were inappropriately narrow. Residents of Southeast Alaska and the Yakutat area have a long history of obtaining large wildlife resources from throughout the region. Subsistence users frequently travel far from home within the region to obtain subsistence resources, and this is a pattern that has been practiced both traditionally and contemporarily. Subsistence users access these areas by plane, boat, vehicle, and all-terrain vehicles. Black bears provide not only nutritional value for families, but for many, there is a deeply seated cultural connection. Subsistence users have passed hunting, processing, and preservation knowledge down for generations. This resource is also frequently shared within and among Southeast Alaska communities and sustain the regional mixed subsistence-cash economy. Harvest and sharing of this species in recent times has been frequently documented in subsistence harvest surveys, harvest ticket reporting, and in testimony at Council meetings and local State advisory committee meetings. There is additional data available in published literature from various authors. It is clear that a long-term pattern of use throughout the region exists for this species and that rural residents of Southeast Alaska continue to rely on black bears to meet their subsistence needs. This species provides substantial cultural, economic, social, and nutritional elements to meet subsistence needs.

**Existing Federal Regulation**

**Customary and Traditional Use Determination—Black Bear**

<i>Unit 1A, 1B, and 1D</i>	<i>All rural residents</i>
<i>Unit 1C</i>	<i>Rural residents of Units 1C, 1D, 3, and Hoonah, Pelican, Point Baker, Sitka, and Tenakee Springs</i>
<i>Units 2 and 3</i>	<i>All rural residents</i>
<i>Unit 5</i>	<i>Rural residents of Unit 5A</i>

**Note:** Black bears are not found in Unit 4.

## Proposed Federal Regulation

### Customary and Traditional Use Determination—Black Bear

<i>Units 1, 2, 3, and 5</i>	<i>Rural residents of Units 1–5</i>
<i>Unit 1A, 1B, and 1D</i>	<i>All rural residents</i>
<i>Unit 1C</i>	<i>Rural residents of Units 1C, 1D, 3, and Hoonah, Pelican, Point Baker, Sitka, and Tenakee Springs</i>
<i>Units 2 and 3</i>	<i>All rural residents</i>
<i>Unit 5</i>	<i>Rural residents of Unit 5A</i>

## Relevant Federal Regulation

### §100.5 Eligibility for subsistence use.

...

*(c) Where customary and traditional use determinations for a fish stock or wildlife population within a specific area have not yet been made by the Board (e.g., “no determination”), all Alaskans who are residents of rural areas or communities may harvest for subsistence from that stock or population under the regulations in this part.*

## Extent of Federal Public Lands

Federal public lands comprise approximately 88% of Southeast Alaska Units 1, 2, 3, and 5. Details by unit are shown in **Table 1**, below. The Tongass National Forest comprises U.S. Forest Service lands. Glacier Bay National Park and Preserve and Wrangell-St. Elias National Park and Preserve comprise National Park Service lands (see **Unit 1–5 Maps**). Glacier Bay National Park is closed to subsistence uses, but Glacier Bay National Preserve is open to subsistence uses.

There are special requirements for National Park Service Lands. Under the guidelines of the Alaska National Interest Conservation Act, National Park Service regulations identify qualified local rural subsistence users in National Parks and Monuments: (1) by identifying resident zone communities, which include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) by identifying and issuing subsistence use permits to individuals residing outside of these resident zone communities who have a personal or family history of subsistence uses.

## Regulatory History

At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Board adopted the State’s customary and traditional use determinations for Units 1–5 into regulations. The State did not recognize customary and traditional uses of black bears in most of Southeast Alaska, except in Unit 1C

**Table 1.** Percentage of Federal public lands in the Southeast Alaska Region Units 1, 2, 3, and 4, by Federal management agency.

<b>Wildlife Management Units</b>	<b>Percentage Federal Public Lands</b>	<b>Percentage Managed by Each Federal Agency</b>
1A	91.3%	91.3% U.S. Forest Service
1B	98.1%	98.1% U.S. Forest Service
1C	95.5%	62.6% U.S. Forest Service 32.9% National Park Service
1D	43.8%	24.9% National Park Service 18.9% U.S. Forest Service
2	74.0%	74.0% U.S. Forest Service
3	90.6%	90.6% U.S. Forest Service
5A	94.5%	63.3% U.S. Forest Service 31.2% National Park Service
5B	96.0%	93.8% National Park Service 2.1% Bureau of Land Management 0.1% U.S. Forest Service

to include rural residents of Unit 1C, and Haines, Klukwan, and Hoonah. The Board determined that, lacking a State determination, then all rural residents would be eligible to hunt black bears under Federal regulations until the Board adopted customary and traditional use determinations for the rest of Southeast Alaska (§100.5(c), see above; 72 FR 22961, May 29, 1992).

In 1998, Proposal P98-02 was submitted by the Petersburg Ranger District of the U.S. Department of Agriculture Forest Service seeking to add Kake to the customary and traditional use determination for black bears in Unit 1C south of Bishop Point, including the drainages into Taku Inlet and River.

Proposal P98-03 was also submitted by the Petersburg Ranger District seeking to add Petersburg to the determination for black bears in Unit 1C south of Point Coke, including drainages into Williams Cove and Tracy Arm.

The Board adopted the Council’s recommendation, and additionally the Board added rural residents of Unit 1D, Unit 2, and the communities Pelican, Point Baker, Sitka, and Tenakee Springs to the existing determination for black bears in Unit 1C (68 FR 38468; June 27, 2003). The Board justification was the following:

The traditional use and ownership area of the Kake Tlingits, the primary residents of the community of Kake, extends north from Unit 1(B) into Unit 1(C) to include Tracy Ann and Endicott Ann. While there is no recent harvest data for black bear in Unit 1(C) by residents of Kake, the fact that the Kake Tlingits’ traditional use area included part of Unit 1(C) constitutes evidence for a positive C&T for black bear for Kake in that area. The other communities in the region listed should be included in the C&T use



determination because they have an active record of harvest in the unit. The rationale for extending the positive C&T for these communities to Unit 1(C) as a whole rather than to a part of it is for regulatory simplicity. The intent of proposal 2 is accommodated in the recommended action pertaining to proposal 3. Exclusion of communities located outside the region, but which have recorded harvest of black bear from Unit 1(C) rests on the rationale that they do not meet the C&T factor which specifies that harvest of resources must take place near, or in a location reasonably accessible to, the community or area (OSM 1998: 25).

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process and present recommendations for regulatory changes (Salazar 2010). During this review in 2016, the Southeast Alaska Council described its view. For example, the Southeast Alaska Council requested, among other things, that the Board adopt customary and traditional use determinations broadly (Bangs 2016:2). The Board responded that the Southeast Alaska Council's recommendation regarding customary and traditional use determinations aligned well with the current process followed statewide in the Federal Subsistence Management Program (Towarak 2016: 5). The Council intends to submit regulatory proposals to the Board requesting to broaden the complex web of customary and traditional use determinations that currently exist in Southeast Alaska (Bangs 2016: 2). The Council has requested, and the Board has adopted, customary and traditional use determinations for all fish (Proposal FP19-17) and for deer (Proposal WP18-02) that include all rural residents of Southeast Alaska. This has greatly simplified these determinations that were originally adopted from State regulations at the formation of the Federal Subsistence Management Program in 1992.

## **Background**

During the Russian Period in Alaska, the Russian American Company exported black bear skins to St. Petersburg and Asia (Bockstoce 2009). The sale of black bear skins was generally allowed until 1971 when the State banned the practice of selling black bear skins and implemented mandatory sealing requirements (State of Alaska 1971). Currently, however, black bear hides and skulls may be sold after sealing, but black bear trophies may not be sold (5 AAC 92.200). The State has allowed the sale of handicraft items made from black bear skins since 1998 (5 AAC 92.200), and the Federal Program adopted similar regulations in 2004 (CFR §100.25 (j)).

Since 2008, all Alaska resident hunters must obtain a State harvest ticket and report their hunting efforts. In 2010, the State re-classified black bears as furbearing animals as well as game animals (5 AAC 92.990 (a)(32)). Consequently, during State hunts, black bears could be taken with a trap, if trapping regulations were adopted. They have not been adopted. A September through June season and a two bear harvest limit have remained the same since statehood.

In Southeast Alaska, black bears occupy the mainland and islands with the exceptions of Admiralty, Baranof, Chichagof, and Kruzof islands (Unit 4). Habitat in Units 2 and 3 support more black bears than in Units 1 and 5. Within Unit 5, black bears are found almost exclusively in Unit 5A because Unit 5B is dominated by the Malaspina Glacier (Bethune 2014, Bethune and Porter 2014, Lowell 2014a and 2014b, and Sell 2014).

Nonresident hunting in Southeast Alaska has grown since the 1970s, peaking around 1990. Since then, a decline in nonresident hunting effort is likely due to several reasons. First, nonresident hunters are required to purchase and compete for a draw permit, or obtain a harvest ticket that requires the nonresident hunter to hire a registered guide to accompany him or her. Additionally the nonresident harvest limit has been reduced from two to one black bear, the meat of spring black bears must be salvaged, and the cost of a nonresident tag has risen. However, nonresident hunters continue to harvest the bulk of black bears that are taken in Southeast Alaska with most taken in Units 2 and 3 where conditions are best for hunter success (Bethune 2014, Bethune and Porter 2014, Lowell 2014a and 2014b, and Sell 2014).

### **Community Characteristics**

The rural area of Southeast Alaska is comprised of about 33 small to medium sized communities, ranging in population from 20 or less (Point Baker, Elfin Cove, and Game Creek) to over 8,000 (Sitka) (**Table 2**, ADCCED 2017, ADLWD 2017, and U.S. Bureau of the Census 1995). Many were established by Tlingit Indians and are situated at historical village sites or were established by Haida Indians (Hydaburg and Kasaan) or Tsimshian Indians (Metlakatla). Population growth in Southeast Alaska during the historical period (beginning about 1750) has been affected by several waves of in-migration, first by Russian fur traders who established Sitka as their headquarters in the late 1700s. After the sale of Alaska to the United States in 1867, new industries (such as commercial fishing, canneries, and mining) and commercial trade, were pursued with the associated influx of outsiders (Worl 1990). Beginning in the 1970s, timber logging camps sprang up and some have persisted as new communities, such as Game Creek and Thorne Bay (Ellanna and Sherrod 1986). Many rural communities in Southeast Alaska have at their core a *kwaan* or tribe of Alaska Natives. The *kwaan* territories mapped in 1947 by Goldschmidt and Haas covered all of Southeast Alaska (Goldschmidt and Haas 1998).

Since 1960, the rural population of Southeast Alaska has doubled from 13,102 people in 1960 to 26,343 people in 2010 (**Table 2**). Some of this growth has been from new communities established near logging activities, growth in the recreation industry, and natural growth (Cervený 2005).

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

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

**Table 2.** The number of people living in rural Southeast Alaska communities, from 1960 to 2010, based on the U.S. Census. NA=not available, *Italic*=estimated (Source: ADLWD 2017, ADCED 2017, and U.S. Bureau of the Census 1995).

Unit of residence	Community	1960	1970	1980	1990	2000	2010	Number of households
1A	Hyder	32	49	77	99	97	87	47
	Metlakatla	1,135	1,245	1,333	1,464	1,375	1,405	469
	Saxman	153	135	273	369	431	411	120
1C	Gustavus	107	64	98	258	429	442	199
1D	Haines borough	<i>1,000</i>	1,504	1,680	2,117	2,392	2,508	991
	Klukwan	112	103	135	129	139	95	44
	Skagway	659	675	814	692	862	920	410
2	Coffman Cove	0	0	193	186	199	176	89
	Craig	273	272	527	1,260	1,397	1,201	523
	Edna Bay	135	112	6	86	49	42	19
	Hollis CDP	0	0	0	111	139	112	55
	Hydaburg	251	214	298	384	382	376	133
	Kasaan	36	30	25	54	39	49	17
	Klawock	251	213	318	722	854	755	313
	Naukati Bay	0	0	0	93	135	113	60
	Point Baker	0	80	90	39	35	15	8
	Port Protection	0	0	40	62	63	48	26
	Thorne Bay	0	443	377	569	557	471	214
	Whale Pass	0	0	90	75	58	31	20
3	Kake	455	448	555	700	710	557	246
	Kupreanof	26	36	47	23	23	27	15
	Petersburg Borough	1,502	2,042	2,821	3,207	3,224	2,948	1,252
	Wrangell Borough	2,165	2,358	2,658	2,479	2,448	2,369	1,053
4	Angoon	395	400	465	638	572	459	167
	Elfin Cove	0	49	28	57	32	20	15
	Game Creek	0	0	0	61	35	18	10
	Hoonah	686	748	680	795	860	760	300
	Pelican	135	133	180	222	163	88	70
	Port Alexander	18	36	86	119	81	52	22
	Sitka borough	3,237	6,109	7,803	8,588	8,835	8,881	3,545
	Tenakee Springs	109	86	138	94	104	131	72
	Whitestone	0	0	NA	164	116	114	30
5A	Yakutat Borough	230	190	449	534	808	662	270
<b>TOTAL</b>		<b>13,102</b>	<b>17,774</b>	<b>22,284</b>	<b>26,450</b>	<b>27,643</b>	<b>26,343</b>	<b>10,824</b>

reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and

traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

### Introduction

If a proposal is received requesting a customary and traditional use determination where none has been made previously for the resource, such as Units 1A, 1B, 1D, 2, and 3 in this proposal, the analyst evaluates use by all rural residents who may harvest the resource within the geographic boundaries defined by the proponent in the request (Units 1, 2, 3, and 5).

### Harvest Reporting System

One source of harvest data are State sealing records. **Appendix Table 1-1** shows that about half of reported black bears harvested in Southeast Alaska was harvested by nonresidents of Alaska (15,248 out of 27,816 black bears, 55%) hunting primarily in Units 2 and 3, based on State sealing records from 1972 to 2018 cumulative (OSM 2019; Scott 2019, pers. comm.). These records do not include the numbers of attempts to take bears as opposed to actually harvesting one, so neither the success rate nor the communities whose residents were unsuccessful in taking black bears is shown. Additionally, people from all over Alaska have taken black bears in Southeast Alaska. It is clear that residents of rural communities are responsible for much of the take (5,714 out of 27,816 black bears, about 21%). **Table 3** below shows the reported harvest of black bears by rural communities in Southeast Alaska. They reported harvesting almost all (5,453 of 5,714 black bears, 95%) of the total harvest reported by rural communities in Alaska since 1972.

Another source of harvest data are State harvest ticket returns since 2008. **Appendix Table 1-2** shows half of reported black bears harvested in Southeast Alaska was harvested by nonresidents of Alaska (1,652 out of 3,208 black bears, 51%) hunting in Units 2 and 3, based on State harvest ticket returns from 2009 to 2018 cumulative (OSM 2019; Scott 2019, pers. comm.). Additionally, people from all over Alaska have taken black bears in Southeast Alaska. It is clear that residents of rural communities are responsible for much of the take (675 out of 3,208 black bears, about 21%). **Table 4** below shows the reported harvest of black bears by rural communities in Southeast Alaska. They reported harvesting almost all (642 of 675 black bears, 95%) of the total harvest reported by rural communities in Alaska since 2008.

Rural communities in Alaska for which an attempt to harvest black bears been documented in **Appendix Table 1-1** and **Appendix Table 1-2** but which are outside of Southeast Alaska will be excluded from further analysis. These communities are not in reasonable proximity to Units 1, 2, 3, or 5, the area under consideration in this analysis.

**Table 3.** State sealing records: The reported harvest of black bears by rural residents of Southeast Alaska, from 1972 to 2018 cumulative (blank cell=0) (Source: OSM 2019; Scott 2019, pers. comm.).

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
1A	ANNETTE	33				24				57
1A	BELL ISLAND	1								1
1A	CLEVELAND PEN	1								1
1A	HYDER	14				1				15
1A	MEYERS CHUCK	4					1			5
1A	NEETS BAY	3								3
1A	REVILLA ISLAND	4								4
1A	SAXMAN	1								1
1B	HOBART BAY			34			1			35
1C	EXCURSION INLET			9						9
1C	GUSTAVUS			101			4	2		107
1D	HAINES	1		51	1,132	3	5	1		1,193
1D	KLUKWAN			1	5			1		7
1D	SKAGWAY		1	5	124		1	1		132
2	CAPE POLE					7				7
2	COFFMAN COVE	2				65	3			70
2	CRAIG	1	1	1		498	4			505
2	EDNA BAY					6	1			7
2	HOLLIS					14				14
2	HYDABURG					33				33
2	KASAAN					4				4
2	KLAWOCK					207	1			208
2	NAUKATI BAY					22				22
2	NICHAN COVE					1				1
2	POINT BAKER			1		1	2			4
2	POLK INLET					2				2
2	PORT ALICE					1				1
2	PORT PROTECTION					5	1			6
2	PRINCE OF WALES					1				1
2	THORNE BAY	2	4		1	314	6	2		329
2	WATERFALL					6				6
2	WHALE PASS					31				31
3	BURNETT INLET						3			3
3	KAKE	1					103			104
3	KUPREANOF CITY						2			2
3	PETERSBURG	5	135	22		44	782			988
3	PORTAGE BAY						1			1
3	ROOSEVELT HBR		1							1
3	ROWAN BAY						8			8
3	WRANGELL	3	124	9		61	283			480
4	ANGOON						6			6
4	HIDDEN FALLS						12			12
4	HOONAH			80	2	1	5			88
4	PELICAN			1			2			3
4	PORT ALEXANDER					1	10			11
4	PORT ARMSTRONG						4			4
4	SITKA	20	2	19	15	49	639	2		746
4	TENAKEE SPRINGS			1			1			2
5A	YAKUTAT			1		1		171		173
	GRAND TOTAL	96	268	336	1,279	1,403	1,891	180	0	5,453

**Table 4.** State harvest ticket reports: The reported harvest of black bears by rural residents of Southeast Alaska, from 2009 to 2018 cumulative (blank cell=0, 0=hunting effort/no harvest (Source: OSM 2019; Scott 2019, pers. comm.).

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 1Z	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
1A	HYDER	2					0				2
1A	METLAKATLA	0		0			2				2
1A	NEETS BAY	0									0
1B	HOLLIS						4				4
1C	GUSTAVUS		1	14	1		2	0		0	18
1D	HAINES	2		2	128			0			132
1D	KLUKWAN				0						0
1D	SKAGWAY			0	27						27
2	COFFMAN COVE	1					11	1			13
2	CRAIG	1		1			38	1		0	41
2	EDNA BAY						1				1
2	KASAAN						0				0
2	KLAWOCK						16	2			18
2	NAUKATI BAY						2				2
2	PRT PROTECTION						0				0
2	PORT ST NICK						0				0
2	THORNE BAY		0	1			55	1			57
2	WATERFALL						1				1
2	WHALE PASS						3				3
3	KAKE						1	12			13
3	KUPREANOF CITY							1			1
3	PETERSBURG	1	10	1			6	76			94
3	WRANGELL	0	5		0	0	6	54	1		66
4	ANGOON			0							0
4	BARANOF							1			1
4	HIDDEN FALLS							19			19
4	HOONAH			4							4
4	PRT ALEXANDER							0			0
4	PRT ARMSTRONG							3			3
4	PORT WALTER							1			1
4	PYBUS BAY							2			2
4	SITKA	5	0	7	0		11	60		0	83
5A	YAKUTAT			1						33	34
	GRAND TOTAL	12	16	31	156	0	159	234	1	33	642

### Black Bear Use in Southeast Alaska

Hunting black bears, or *s'eeek* in Tlingit, *táan* in Haida, and *'tu'utsgm ol* in Tsimshian, is a well-documented Tlingit, Haida, and Tsimshian tradition (Edwards 2009, Lacher 2010, and Roberts 2009). Black bear were customarily and traditionally harvested during all months of the year, often opportunistically while hunters were engaged in other activities. In the late summer or fall black bears were often hunted in conjunction with fishing, when their meat could be either dried and stored, or eaten fresh (Oberg 1973). Winter was also considered one of the prime hunting times for black bear. In the

early spring, bears just emerging from their dens were sought for their hides (Oberg 1973 and Emmons 1991).

In rural communities of the region, the harvest of fish, wildlife, and plants follows a yearly cycle that is primarily based on the seasonal appearance of fish, wildlife, and plant resources. This seasonal round is a regular pattern, although some fluctuation appears from year to year depending on the availability of certain species and weather conditions. In more recent times, wage employment and regulations have influenced the timing of harvests. The knowledge of these seasonal fish, wildlife, and plant harvesting opportunities is widely shared throughout the communities (Firman and Bosworth 1990 and Smythe 1988). In recent times, hunting has occurred during seasons set by the Alaska Board of Game. Since 1959, essentially all open black bear seasons have been September through June (Bethune 2014). Traditionally, southeast Alaska Native hunters speared bears in dens, often with the aid of dogs, or ambushed them along trail and beaches. Besides spears, a pick-like club was used to kill bears. Bears were also shot with bows and arrows from tree stands above their trails (de Laguna 1960 and Berg 1973). Deadfalls and pits also were used by the Tlingit. The steel leg trap, used with a heavy log and chain drag, had replaced many of these earlier methods by the late 1800s (Emmons 1991).

Today, there is no trapping season for black bears. Contemporary hunters use rifles to take bears. Access to hunting areas is by boat, by off-road vehicles where roads exist, and sometimes by aircraft. After a bear is shot, it is generally skinned and quartered, then carried in portions to an access point (ADF&G 1992).

Communities in the region have a history of hunting and fishing near their communities as well as fairly distantly from those communities. Availability of faster, larger boats has increased the ease of access to some areas (Cohen 1988:47–52, Ellanna and Sherrod 1986, Firman and Bosworth 1990, Gmelch and Gmelch 1983, Sill and Koster 2017a and 2017b, Smythe 1988).

Black bear have traditionally been used in Southeast Alaska as an important source of food, clothing, grease, and fat. Black bear hide, fat, and claws were a common trade item among all Native groups of the region. Beyond their use for food and utility items, black bears continue to be important as mythical or symbolic beings; black bear are found on totems and clan crests. Many traditional clan houses are named after the black bear. The Sitka Tlingit calendar, for instance, refers to February as “the month when black and brown bears begin to have cubs and throw them out into the snow;” the Wrangell Tlingit calendar has the same time as “black bear month, the month when the black bear turns over on the other side in his den” (ADF&G 1992).

Traditionally, bear meat was harvested and eaten fresh, or dried and stored for later consumption. Today, bear meat is eaten fresh, or may be frozen, canned, corned, or made into sausage (Oberg 1973).

Knowledge relating to the taking and use of black bears extends well into the prehistory of the indigenous peoples of the region. Non-Native people immigrating into the region in the last two centuries brought their own bear hunting experience and lore with them. The combination of these traditions continues in all of the communities in the region.

The antiquity of the bear population in the region extends to between 23,000 and 42,000 years ago, as evidenced by recent paleontological work at On Your Knees Cave on Prince of Wales Island. A black bear tibia found in that cave has been radiocarbon dated at 41,600 +/- 1,500 years old. The presence of human remains in the same cave dating to nearly 10,000 years ago, suggests that human use of bear in the region is quite ancient (Heaton et al. 1996).

To Tlingits, hunting and fishing were, and continue to be important religious, moral, as well as subsistence occupations. In the past,

The hunter would pray to the dead animal and to his own “spirit above,” explaining his need and asking forgiveness. The dead creature was thanked in song ... [and] certain essential parts (head, bones, or vital organs, depending on the species) were interred to the water, or cremated, to insure reincarnation of the animal (de Laguna 1990:209).

There is good evidence that use of black bears in the region has been continuous through recorded history in all areas where bears have been found. Black bear is often featured at Alaska Native traditional ceremonies, continuing an ancient tradition. In all communities, black bear hunting areas are locally known, and a newcomer without kinship ties in a community may not be shown these areas until becoming established as a resident and as a hunter. At that time, knowledge is passed from friends and neighbors (ADF&G 1992).

### Sharing

Black bears are widely shared in the region, within and between communities. This is an indication of their value, their discontinuous occurrence in the region, and the large quantity of meat provided by one animal. According to Alaska Department of Fish Game, Division of Subsistence, household surveys conducted between 1983 and 2015 demonstrate that in all communities where hunters harvest black bears, hunters share their harvests with other households. Similarly, several communities report using black bears even though they report no harvest. Based on household surveys, 29 of 34 communities report using black bears, and 29 of 34 communities report sharing their black bear harvests with others (see **Appendix Table 1-3**, ADF&G 2019). Trade in black bears often involves other valued resources such as herring eggs, hooligan oil, or moose meat (ADF&G 1992).

### Reliance Upon a Wide Diversity of Fish and Wildlife Resources

Most communities in Southeast Alaska rely a wide variety of wild resources. These resources comprise a substantial portion of dietary intake of households in these communities. The Alaska Department of Fish and Game, Division of Subsistence, household surveys conducted between 1983 and 2015 demonstrate this variety of use. Harvest level estimates are described in categories such as salmon, nonsalmon fish, land mammals, marine mammals, birds and eggs, marine invertebrates, and plants and berries in lbs. edible weight annually. Overall harvest rates above 200 lbs. per person are common. In general, Southeast communities harvest fish at the highest rates and land mammals, such as deer and moose, and marine invertebrates, such as clams and crab, are also harvested at high rates. Marine mammals, birds, and plants



comprise smaller portions of annual harvests but are important components of the diet (see **Appendix Table 1-4**, ADF&G 2019).

### **Effects of the Proposal**

If Proposal WP20-10 is adopted, those eligible to hunt black bears under Federal regulations in Unit 1C will increase from rural residents of Units 1C, 1D, 3, and Hoonah, Pelican, Point Baker, Sitka, and Tenakee Springs, and in Unit 5 will increase from rural residents of Unit 5A, to all rural residents of Southeast Alaska, Units 1–5.

In contrast, eligibility to hunt black bears under Federal regulations in the remainder of Southeast Alaska (in Units 1A, 1B, 1D, 2, and 3) will be reduced from all rural residents of the state, to residents of only Southeast Alaska Units 1–5.

### **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP20-10.

#### **Justification**

Rural residents of Southeast Alaska Units 1–5 have demonstrated customary and traditional uses of black bears in Southeast Alaska according to ethnographic descriptions and harvest documentation. At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Board adopted the State’s customary and traditional use determinations into permanent regulations. The Board did not adopt a determination for black bears in Units 1A, 1B 1D, 2, and 5 because the State did not recognize customary and traditional uses of black bears in those units (72 FR 22961, May 29, 1992).

Black bear have traditionally been used in Southeast Alaska as an important source of food, clothing, grease, and fat. Black bear hide, fat, and claws were common trade items among all Native groups of the region. There has been a long history of harvesting black bears for their furs, especially for the Russian market where black bear hides were made into outer garments and held prestige (Bockstoe 2009).

Several other factors have affected long-term patterns of black bear use by rural Southeast Alaska residents. Harvest information and ethnographic accounts reveal that rural residents have a history of hunting nearby their communities. However, they also travel fairly distantly. These decisions on how far to travel are influenced by factors such as availability of black bears, availability of faster, larger boats, visits to clan mates and friends in distant communities, et cetera. People in Southeast Alaska travel from home to other communities for many reasons such as to visit family and friends, to harvest wild resources, for potlatches and other cultural celebrations, and to return to traditional clan and kwaan territories. At these times, they need to be able to continue long-standing patterns of hunting (**Table 3** and **Table 4**, Cohen 1988:47–52, Ellanna and Sherrod 1986, Firman and Bosworth 1990, Gmelch and Gmelch 1983, Sill and Koster 2017a and 2017b, Smythe 1988).

Another factor possibly affecting patterns of black bear use is competition with other hunters. The proportion of rural Southeast Alaska residents using Units 2 and 3 to harvest black bears is much smaller than for the group of other hunters who visit Units 2 and 3 in large numbers (**Appendix Tables 1-1 and 1-2**). Units 2 and 3 offer the better black bear habitat and abundance than other units, but rural Southeast Alaska hunters must compete with other hunters, a factor that may dissuade them from traveling to Units 2 and 3. Additionally, currently, black bears are rare in Unit 5B because it is dominated by the Malaspina Glacier and therefore few harvests have been reported there. Rural residents of Unit 5A have demonstrated hunting in Unit 5A and some harvest in distant management units. Further, while black bears are not found in Unit 4, Unit 4 residents have demonstrated traveling to Units 1, 2, 3, and 5 in search of black bears.

Rural communities in Alaska for which an attempt to harvest black bears is documented but which are outside of Southeast Alaska were not considered. These communities are not in reasonable proximity to Units 1, 2, 3, or 5, the area under consideration in this analysis.

Finally, the Southeast Alaska Council has requested that the Board consider customary and traditional use determinations broadly and inclusively (Bangs 2016:2). Therefore, all rural residents of Southeast Alaska should be included in a customary and traditional use determination for black bears in Units 1, 2, 3, and 5.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDIX 1

**Appendix Table 1-1.** State sealing records: The reported harvest of black bears by wildlife management unit, from 1972 to 2018 cumulative (**bold**=rural community, blank cell=0) (Source: OSM 2019; Scott 2019, pers. comm.).

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
1A	ANNETTE	33				24				57
1A	BELL ISLAND	1								1
1A	CLEVELAND PEN	1								1
1A	HYDER	14				1				15
1A	KETCHIKAN	1,301	8	8	3	756	25			2,101
1A	MEYERS CHUCK	4					1			5
1A	NEETS BAY	3								3
1A	REVILLA ISLAND	4								4
1A	SAXMAN	1								1
1A	WARD COVE	190	1	1		104	1			297
1A	YES BAY	1								1
1B	HOBART BAY			34			1			35
1C	AUKE BAY	4		127	1	5	14			151
1C	DOUGLAS	2		85	3	4	5			99
1C	EXCURSION INLET			9						9
1C	GUSTAVUS			101			4	2		107
1C	JUNEAU	18	9	1,948	83	54	142	9		2,263
1D	HAINES	1		51	1,132	3	5	1		1,193
1D	KLUKWAN			1	5			1		7
1D	SKAGWAY		1	5	124		1	1		132
2	CAPE POLE					7				7
2	COFFMAN COVE	2				65	3			70
2	CRAIG	1	1	1		498	4			505
2	EDNA BAY					6	1			7
2	HOLLIS					14				14
2	HYDABURG					33				33
2	KASAAN					4				4
2	KLAWOCK					207	1			208
2	NAUKATI BAY					22				22
2	NICHAN COVE					1				1
2	POINT BAKER			1		1	2			4
2	POLK INLET					2				2
2	PORT ALICE					1				1
2	PORT PROTECTION					5	1			6
2	PRINCE OF WALES					1				1
2	THORNE BAY	2	4		1	314	6	2		329
2	WATERFALL					6				6
2	WHALE PASS					31				31
3	BURNETT INLET						3			3
3	KAKE	1					103			104
3	KUPREANOF CITY						2			2

Continued on next page



**Appendix Table 1-1.** State sealing records: The reported harvest of black bears by wildlife management unit, from 1972 to 2018 cumulative (**bold**=rural community, blank cell=0) *Continued from previous page.*

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
<b>3</b>	<b>PETERSBURG</b>	<b>5</b>	<b>135</b>	<b>22</b>		<b>44</b>	<b>782</b>			988
<b>3</b>	<b>PORTAGE BAY</b>						<b>1</b>			1
<b>3</b>	<b>ROOSEVELT HBR</b>		<b>1</b>							1
<b>3</b>	<b>ROWAN BAY</b>						<b>8</b>			8
<b>3</b>	<b>WRANGELL</b>	<b>3</b>	<b>124</b>	<b>9</b>		<b>61</b>	<b>283</b>			480
<b>4</b>	<b>ANGOON</b>						<b>6</b>			6
<b>4</b>	<b>HIDDEN FALLS</b>						<b>12</b>			12
<b>4</b>	<b>HOONAH</b>			<b>80</b>	<b>2</b>	<b>1</b>	<b>5</b>			88
<b>4</b>	<b>PELICAN</b>			<b>1</b>			<b>2</b>			3
<b>4</b>	<b>PORT ALEXANDER</b>					<b>1</b>	<b>10</b>			11
<b>4</b>	<b>PORT ARMSTRONG</b>						<b>4</b>			4
<b>4</b>	<b>SITKA</b>	<b>20</b>	<b>2</b>	<b>19</b>	<b>15</b>	<b>49</b>	<b>639</b>	<b>2</b>		746
<b>4</b>	<b>TENAKEE SPRINGS</b>			<b>1</b>			<b>1</b>			2
<b>5A</b>	<b>YAKUTAT</b>			<b>1</b>		<b>1</b>		<b>171</b>		173
<b>6C</b>	<b>CORDOVA</b>					<b>2</b>				2
6D	VALDEZ	5			1	4	10	3		23
7	MOOSE PASS					1				1
7	SEWARD	4	1	1		2	2			10
<b>8</b>	<b>CHINIAK</b>						<b>1</b>			1
<b>8</b>	<b>KODIAK</b>	<b>20</b>		<b>11</b>		<b>27</b>	<b>6</b>			64
<b>9B</b>	<b>KOKHANOK</b>							<b>3</b>		3
<b>9B</b>	<b>LEVELOCK</b>						<b>1</b>			1
<b>9C</b>	<b>KING SALMON</b>			<b>1</b>		<b>1</b>	<b>1</b>			3
<b>9C</b>	<b>NAKNEK</b>					<b>1</b>				1
<b>9D</b>	<b>SAND POINT</b>					<b>2</b>				2
<b>9E</b>	<b>PORT HEIDEN</b>					<b>1</b>				1
<b>10</b>	<b>ADAK</b>				<b>1</b>		<b>1</b>			2
<b>10</b>	<b>DUTCH HARBOR</b>				<b>1</b>		<b>1</b>			2
<b>10</b>	<b>UNALASKA</b>	<b>1</b>				<b>4</b>	<b>1</b>			6
<b>12</b>	<b>NORTHWAY</b>				<b>3</b>					3
<b>13D</b>	<b>CHITINA</b>					<b>1</b>				1
<b>13D</b>	<b>COPPER CENTER</b>		<b>1</b>	<b>1</b>	<b>2</b>					4
<b>13D</b>	<b>GLENNALLEN</b>			<b>1</b>		<b>2</b>	<b>1</b>			4
14A	BIG LAKE			2		1	1			4
14A	HOUSTON	2		1		3				6
14A	PALMER			9	1	45	8	4		67
14A	WASILLA	16	2	18	5	139	47	5		232
14A	WILLOW					2				2
<b>14B</b>	<b>CHICKALOON</b>					<b>1</b>				1
14C	ANCHORAGE	42	9	99	21	188	158	71	3	591
14C	CHUGIAK	6	1	6	1	10	12	2		38
14C	EAGLE RIVER	4	1	18	4	38	23	8		96
14C	ELMENDORF AFB	0	1	0	11	10	4	3		29
14C	FORT WAINWRIGHT	2			4	18	3	6		33

*Continued on next page.*

**Appendix Table 1-1.** State sealing records: The reported harvest of black bears by wildlife management unit, from 1972 to 2018 cumulative (**bold**=rural community, blank cell=0) *Continued from previous page.*

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
14C	FORT RICHARDSON		1			17	5	8		31
14C	FRITZ CREEK						1			1
14C	GIRDWOOD	1				3				4
<b>15A</b>	<b>COOPER LANDING</b>			<b>2</b>		<b>1</b>	<b>1</b>			4
15A	NIKISKI					2				2
15B	KASILOF					6	1			7
15B	KENAI	1	1	3		15	5	10		35
15B	SOLDOTNA	4		13	3	19	2	5		46
15B	STERLING				1	1				2
15C	ANCHOR POINT			1		3				4
15C	HOMER	3				6	1	2		12
<b>15C</b>	<b>NINILCHIK</b>						<b>2</b>			2
<b>17C</b>	<b>ALEKNAGIK</b>					<b>1</b>				1
<b>17C</b>	<b>DILLINGHAM</b>					<b>3</b>	<b>7</b>			10
<b>18</b>	<b>AKIAK</b>					<b>1</b>				1
<b>18</b>	<b>BETHEL</b>					<b>3</b>				3
<b>20A</b>	<b>HEALY</b>	<b>2</b>								2
<b>20A</b>	<b>NENANA</b>					<b>2</b>				2
20B	EIELSON AFB		1		9	2	2	2		16
20B	ESTER					1				1
20B	FAIRBANKS	13	1	27	25	76	39	19		200
<b>20B</b>	<b>MANLEY</b>					<b>2</b>				2
20B	NORTH POLE	6		4	8	10	6	1		35
20B	NORTH STAR BOR					1				1
20B	SALCHA					2	2			4
<b>20C</b>	<b>DENALI PARK</b>					<b>1</b>				1
<b>20D</b>	<b>DELTA JCT</b>		<b>1</b>	<b>5</b>	<b>6</b>	<b>4</b>	<b>3</b>	<b>8</b>		27
<b>20D</b>	<b>FORT GREELY</b>	<b>12</b>				<b>11</b>				23
20D	TOK	5	1	1	4	2	7			20
20D	TOKEEN					5				5
<b>21B</b>	<b>RUBY</b>	<b>1</b>								1
<b>22A</b>	<b>STEBBINS</b>						<b>2</b>			2
<b>22A</b>	<b>UNALAKLEET</b>		<b>2</b>			<b>1</b>	<b>7</b>			10
<b>22C</b>	<b>NOME</b>			<b>7</b>	<b>1</b>	<b>7</b>	<b>3</b>			18
<b>23</b>	<b>AMBLER</b>		<b>1</b>			<b>6</b>				7
<b>23</b>	<b>KOTZEBUE</b>			<b>1</b>	<b>1</b>	<b>5</b>	<b>1</b>			8
<b>23</b>	<b>NOORVIK</b>					<b>4</b>				4
<b>26A</b>	<b>BARROW</b>						<b>2</b>			2
<b>26A</b>	<b>PRUDHOE BAY</b>						<b>4</b>			4
<b>26A</b>	<b>WAINWRIGHT</b>				<b>1</b>					1
	UKNONWN	64	6	109	36	88	68	2		373
	NONRESIDENT	970	349	1,329	408	6,649	5,096	471	12	15,284
	GRAND TOTAL	2,796	666	4,175	1,927	9,789	7,626	822	15	27,816

**Appendix Table 1-2.** State harvest tickets: The reported harvest of black bears by wildlife management unit, from 2009 to 2018 cumulative (**bold**=rural community, blank cell=0, 0=hunting effort/no harvest) (Source:OSM 2019; Scott 2019, pers. comm.).

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 1Z	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
<b>1A</b>	<b>HYDER</b>	<b>2</b>					<b>0</b>				<b>2</b>
1A	KETCHIKAN	187	3	3	0	0	70	3		0	266
<b>1A</b>	<b>METLAKATLA</b>	<b>0</b>		<b>0</b>			<b>2</b>				<b>2</b>
<b>1A</b>	<b>NEETS BAY</b>	<b>0</b>									<b>0</b>
1A	WARD COVE	12					6				18
<b>1B</b>	<b>HOLLIS</b>						<b>4</b>				<b>4</b>
1C	AUKE BAY	0	0	4	0			0			4
1C	DOUGLAS			13	0		0	3	0		16
<b>1C</b>	<b>GUSTAVUS</b>		<b>1</b>	<b>14</b>	<b>1</b>		<b>2</b>	<b>0</b>		<b>0</b>	<b>18</b>
1C	JUNEAU	1	3	248	14	0	14	35	1	0	316
<b>1D</b>	<b>HAINES</b>	<b>2</b>		<b>2</b>	<b>128</b>			<b>0</b>			<b>132</b>
<b>1D</b>	<b>KLUKWAN</b>				<b>0</b>						<b>0</b>
<b>1D</b>	<b>SKAGWAY</b>			<b>0</b>	<b>27</b>						<b>27</b>
<b>2</b>	<b>COFFMAN COVE</b>	<b>1</b>					<b>11</b>	<b>1</b>			<b>13</b>
<b>2</b>	<b>CRAIG</b>	<b>1</b>		<b>1</b>			<b>38</b>	<b>1</b>		<b>0</b>	<b>41</b>
<b>2</b>	<b>EDNA BAY</b>						<b>1</b>				<b>1</b>
<b>2</b>	<b>KASAAN</b>						<b>0</b>				<b>0</b>
<b>2</b>	<b>KLAWOCK</b>						<b>16</b>	<b>2</b>			<b>18</b>
<b>2</b>	<b>NAUKATI BAY</b>						<b>2</b>				<b>2</b>
<b>2</b>	<b>PRT PROTECTION</b>						<b>0</b>				<b>0</b>
<b>2</b>	<b>PORT ST NICK</b>						<b>0</b>				<b>0</b>
<b>2</b>	<b>THORNE BAY</b>		<b>0</b>	<b>1</b>			<b>55</b>	<b>1</b>			<b>57</b>
<b>2</b>	<b>WATERFALL</b>						<b>1</b>				<b>1</b>
<b>2</b>	<b>WHALE PASS</b>						<b>3</b>				<b>3</b>
<b>3</b>	<b>KAKE</b>						<b>1</b>	<b>12</b>			<b>13</b>
<b>3</b>	<b>KUPREANOF CITY</b>							<b>1</b>			<b>1</b>
<b>3</b>	<b>PETERSBURG</b>	<b>1</b>	<b>10</b>	<b>1</b>			<b>6</b>	<b>76</b>			<b>94</b>
<b>3</b>	<b>WRANGELL</b>	<b>0</b>	<b>5</b>		<b>0</b>	<b>0</b>	<b>6</b>	<b>54</b>	<b>1</b>		<b>66</b>
<b>4</b>	<b>ANGOON</b>			<b>0</b>							<b>0</b>
<b>4</b>	<b>BARANOF</b>							<b>1</b>			<b>1</b>
<b>4</b>	<b>HIDDEN FALLS</b>							<b>19</b>			<b>19</b>
<b>4</b>	<b>HOONAH</b>			<b>4</b>							<b>4</b>
<b>4</b>	<b>PRT ALEXANDER</b>							<b>0</b>			<b>0</b>
<b>4</b>	<b>PRT ARMSTRONG</b>							<b>3</b>			<b>3</b>
<b>4</b>	<b>PORT WALTER</b>							<b>1</b>			<b>1</b>
<b>4</b>	<b>PYBUS BAY</b>							<b>2</b>			<b>2</b>
<b>4</b>	<b>SITKA</b>	<b>5</b>	<b>0</b>	<b>7</b>	<b>0</b>		<b>11</b>	<b>60</b>		<b>0</b>	<b>83</b>
<b>5A</b>	<b>YAKUTAT</b>			<b>1</b>						<b>33</b>	<b>34</b>
<b>6C</b>	<b>CORDOVA</b>		<b>0</b>								<b>0</b>
6D	VALDEZ	0		0			1				1
7	MOOSE PASS							0			0
7	SEWARD	0						2			2
<b>8</b>	<b>CHINIAK</b>							<b>1</b>			<b>1</b>
<b>8</b>	<b>KODIAK</b>	<b>2</b>		<b>1</b>	<b>0</b>		<b>7</b>	<b>2</b>		<b>0</b>	<b>12</b>

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**Appendix Table 1-2.** State harvest tickets: The reported harvest of black bears by wildlife management unit, from 2009 to 2018 cumulative (**bold**=rural community, blank cell=0, 0=hunting effort/no harvest)  
Continued from previous page

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 1Z	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
<b>9C</b>	<b>KING SALMON</b>						1				1
<b>9D</b>	<b>COLD BAY</b>			0							0
<b>9D</b>	<b>SAND POINT</b>							1			1
<b>9E</b>	<b>IVANOF BAY</b>			0							0
<b>10</b>	<b>AKUTAN</b>						0				0
<b>10</b>	<b>SHEMYA</b>						1	1			2
<b>12</b>	<b>CHISANA</b>				0						0
<b>13D</b>	<b>COPPER CENTER</b>						0				0
14A	BIG LAKE			0						0	0
14A	HOUSTON						1	1			2
14A	MEADOW LAKES							0			0
14A	PALMER	0		0	0		12	0		1	13
14A	SUTTON						0				0
14A	WASILLA	4	0	1	1		30	13	0	1	50
14A	WILLOW	0					0			0	0
14C	ANCHORAGE	3	3	6	2	0	43	18	0	5	80
14C	CHUGIAK	2		0			4	4	0	1	11
14C	EAGLE RIVER	0			1	1	6	2	0	0	10
14C	ELMENDORF AFB						3				3
14C	GIRDWOOD			0			3				3
14C	PETERS CREEK										0
15A	NIKISKI				0		1			0	1
15A	STERLING						0				0
15B	KALIFORNSKY			0							0
15B	KASILOF			0			3				3
15B	KENAI			0			0			0	0
15B	SOLDOTNA						2	1		0	3
15C	ANCHOR POINT				0						0
15C	CLAM GULCH							0			0
15C	HOMER	0					0				0
<b>15C</b>	<b>NINILCHIK</b>						1	2			3
<b>18</b>	<b>BETHEL</b>						2			0	2
<b>20A</b>	<b>NENANA</b>						0				0
20B	EIELSON AFB						1				1
20B	ESTER							0			0
20B	FAIRBANKS	1	0	1	2		15	8		2	29
20B	NORTH POLE			0	0	0	3	2	0	0	5
20B	SALCHA						0				0
20B	FT WAINWRIGHT	0	0					0			0
<b>20D</b>	<b>DELTA JUNCTION</b>				1		1			0	2
<b>20D</b>	<b>FORT GREELY</b>						1				1
<b>21D</b>	<b>GALENA</b>							0			0
<b>22C</b>	<b>NOME</b>	0		0	1		1	1			3
<b>23</b>	<b>AMBLER</b>		1				0		0		1
<b>23</b>	<b>KOTZEBUE</b>				1		2				3

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**Appendix Table 1-2.** State harvest tickets: The reported harvest of black bears by wildlife management unit, from 2009 to 2018 cumulative (**bold**=rural community, blank cell=0, 0=hunting effort/no harvest)  
*Continued from previous page*

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 1Z	Unit 2	Unit 3	Unit 5A	Unit 5B	Total
<b>26A</b>	<b>UTQIAGVIK</b>			<b>1</b>	<b>0</b>						<b>1</b>
	UNKNOWN	8	1	7			9	19			44
	NONRESIDENT	96	45	126	18	4	665	678	20		1,652
	GRAND TOTAL	328	72	442	197	5	1,068	1,031	22	43	3,208

**Appendix Table 1-3.** The estimated harvest and use of black bears by rural residents of Southeast Alaska during one year study periods between 1983 and 2015, based on household surveys, blank cell=0, NA=question not asked (Source: ADF&G 2019).

Unit of residence	Community	Study Year	% of HHs using black bears	% of HHs attempting to harvest black bears	% of HHs harvesting black bears	% of HHs giving black bears	% of HHs receiving black bears
1A	Hyder	1987	18%	NA	18%	3%	
1A	Metlakatla	1987	6%	NA			6%
1A	Meyers Chuck	1987	10%	NA			10%
1A	Saxman	1987	8%	NA			8%
1A	Saxman	1999	8%	3%	1%	5%	7%
1C	Gustavus	1987		NA			
1D	Haines	1983	16%	16%	10%	5%	8%
1D	Haines	1987	17%	NA	8%	5%	11%
1D	Haines	1996	18%	7%	7%	7%	14%
1D	Haines	2012	13%	9%	4%	4%	9%
1D	Klukwan	1983	3%	12%	3%	3%	
1D	Klukwan	1987	12%	NA	7%	7%	5%
1D	Klukwan	1996	10%	3%			10%
1D	Skagway	1987	4%	NA	1%	1%	3%
2	Coffman Cove	1987	3%	NA			3%
2	Coffman Cove	1998	32%	22%	18%	10%	16%
2	Craig	1987	5%	NA	2%	1%	3%
2	Craig	1997	8%	6%	5%	4%	5%
2	Edna Bay	1987	45%	NA	45%	20%	20%
2	Edna Bay	1998	33%	17%	17%	17%	17%
2	Hollis	1987	33%	NA	11%	7%	26%
2	Hollis	1998	7%	2%	2%	2%	7%
2	Hydaburg	1987	6%	NA	2%	2%	5%
2	Hydaburg	1997					
2	Hydaburg	2012					
2	Kasaan	1987		NA			
2	Kasaan	1998	7%	14%	7%	7%	
2	Klawock	1984	3%	8%	3%	3%	
2	Klawock	1987	6%	NA	2%	1%	4%
2	Klawock	1997	6%	7%	3%	2%	3%
2	Naukati Bay	1998	32%	18%	16%	6%	18%
2	Point Baker	1987	32%	NA	21%	21%	11%
2	Point Baker	1996	25%	6%	6%	6%	19%
2	Port Protection	1987	44%	NA	4%		44%
2	Port Protection	1996	24%	12%	12%	8%	12%
2	Thorne Bay	1987	22%	NA	7%	4%	18%
2	Thorne Bay	1998	6%	6%	5%	1%	2%
2	Whale Pass	1987	22%	NA	11%		11%

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**Appendix Table 1-3.** The estimated harvest and use of black bears by rural residents of Southeast Alaska during one year study periods between 1984 and 2015, based on household surveys, blank cell=0, NA=question not asked. *Continued from previous page*

Unit of residence	Community	Study Year	% of HHs using black bears	% of HHs attempting to harvest black bears	% of HHs harvesting black bears	% of HHs giving black bears	% of HHs receiving black bears
2	Whale Pass	1998	33%			13%	33%
2	Whale Pass	2012	5%			5%	5%
3	Beecher Pass	1987	40%	NA	20%		20%
3	Kake	1985	3%	1%	1%		
3	Kake	1987		NA			0%
3	Kake	1996	4%	3%	3%	1%	1%
3	Petersburg	1987	5%	NA	3%	3%	2%
3	Petersburg	2000	3%	2%	1%		2%
3	Wrangell	1987	8%	NA	5%	3%	7%
3	Wrangell	2000	3%	3%	1%	2%	2%
4	Angoon	1984					
4	Angoon	1987		NA			
4	Angoon	1996					
4	Angoon	2012					
4	Elfin Cove	1987		NA			
4	Game Creek	1996					
4	Hoonah	1985	1%				1%
4	Hoonah	1987	3%	NA	3%		1%
4	Hoonah	1996	3%	3%	1%	1%	1%
4	Hoonah	2012					
4	Pelican	1987	3%	NA			3%
4	Port Alexander	1987	6%	NA	3%	3%	6%
4	Sitka	1987	1%	NA	1%		
4	Sitka	1996	3%	2%	2%	1%	2%
4	Sitka	2013		1%			
4	Tenakee Springs	1984					
4	Tenakee Springs	1987	3%	NA			3%
4	Whitestone	1996					
5A	Yakutat	1984	8%	8%	4%	4%	8%
5A	Yakutat	1987	10%	NA	1%	4%	9%
5A	Yakutat	2000	10%	6%	4%	3%	7%
5A	Yakutat	2015	14%	10%	7%	5%	8%

**Appendix Table 1-4.** The estimated harvest of wild resources for subsistence, in pounds edible weight per person, by rural residents of Southeast Alaska, during one year study periods between 1983 and 2015, based on household surveys (Source: ADF&G 2019).

Community	Study year	Salmon	Non-salmon fishes	Land mammals	Marine mammals	Birds and eggs	Marine invertebrates	Plants and berries	Total
Angoon	1984	74	46	58	17	1	13	8	216
Angoon	1987	71	35	73	32	1	26	7	244
Angoon	1996	82	48	51	9	0	30	4	224
Angoon	2012	37	53	51	5	0	22	13	183
Beecher Pass	1987	131	108	109	0	23	93	13	477
Coffman Cove	1987	52	56	60	1	1	9	5	183
Coffman Cove	1998	63	83	66	1	3	49	11	276
Craig	1987	40	62	42	5	1	29	6	185
Craig	1997	65	63	47	10	1	29	19	232
Edna Bay	1987	99	135	147	0	4	67	26	479
Edna Bay	1998	55	186	90	0	0	16	36	383
Elfin Cove	1987	81	59	72	0	0	24	27	263
Game Creek	1996	27	54	47	0	3	36	20	187
Gustavus	1987	55	82	64	0	2	28	10	241
Haines	1983	46	33	34	1	3	3	5	126
Haines	1987	28	37	23	0	1	4	5	97
Haines	1996	58	81	29	1	1	11	15	196
Haines	2012	47	38	28	0	1	12	10	135
Hollis	1987	44	35	42	0	1	49	11	183
Hollis	1998	40	31	40	0	0	53	6	169
Hoonah	1985	47	40	58	21	1	22	21	210
Hoonah	1987	100	78	90	53	1	49	13	385
Hoonah	1996	113	67	81	23	1	58	30	372
Hoonah	2012	72	120	52	13	2	41	44	343
Hydaburg	1987	137	83	43	7	1	51	14	336
Hydaburg	1997	117	109	35	3	1	101	19	384
Hydaburg	2012	214	133	68	5	0	83	27	531
Hyder	1987	121	86	32	8	6	85	7	345
Kake	1985	69	46	27	26	1	19	29	218
Kake	1987	35	33	39	23	1	18	15	163
Kake	1996	44	42	52	10	1	22	9	179
Kasaan	1987	32	32	40	2	0	69	6	182
Kasaan	1998	93	184	70	25	0	61	19	452
Klawock	1984	69	58	36	14	1	28	18	223
Klawock	1987	75	72	47	5	1	40	7	247
Klawock	1997	105	78	54	21	1	37	24	320
Klukwan	1983	114	33	14	2	1	0	6	170
Klukwan	1987	124	81	14	8	1	1	10	238
Klukwan	1996	267	252	28	3	1	14	45	608

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**Appendix Table 1-4.** The estimated harvest of wild resources for subsistence, in pounds edible weight per person, by rural residents of Southeast Alaska during one year study periods between 1983 and 2015, based on household surveys. *Continued from previous page*

Community	Study year	Salmon	Non-salmon fishes	Land mammals	Marine mammals	Birds and eggs	Marine invertebrates	Plants and berries	Total
Metlakatla	1987	20	17	11	1	1	15	5	70
Meyers Chuck	1987	105	174	48	0	9	64	14	414
Naukati Bay	1998	49	73	51	1	2	54	12	242
Pelican	1987	60	119	111	8	1	47	9	355
Petersburg	1987	45	44	57	0	4	39	9	198
Petersburg	2000	60	42	17	0	1	37	4	161
Point Baker	1987	89	66	101	0	3	66	20	346
Point Baker	1996	82	89	47	0	0	58	12	289
Port Alexander	1987	70	70	108	3	1	31	28	312
Port Protection	1987	111	88	41	0	2	43	19	304
Port Protection	1996	59	111	101	9	2	139	30	451
Saxman	1987	33	19	20	2	0	14	4	94
Saxman	1999	84	47	29	12	0	23	23	217
Sitka	1987	39	43	38	1	1	18	5	145
Sitka	1996	58	54	51	7	1	27	7	205
Sitka	2013	46	68	26	3	0	19	12	175
Skagway	1987	18	16	4	0	0	9	2	48
Tenakee Springs	1984	71	42	65	4	0	61	7	250
Tenakee Springs	1987	49	82	135	8	2	43	11	330
Thorne Bay	1987	48	73	40	0	1	24	4	189
Thorne Bay	1998	62	37	36	11	1	26	6	179
Whale Pass	1987	41	37	60	2	1	33	5	179
Whale Pass	1998	28	36	51	0	0	57	13	185
Whale Pass	2012	52	76	80	0	13	24	3	247
Whitestone	1996	21	71	57	0	1	23	5	178
Wrangell	1987	30	43	32	7	1	38	4	155
Wrangell	2000	26	34	39	0	1	60	8	168
Yakutat	1984	129	82	52	24	10	46	26	369
Yakutat	1987	216	77	15	31	2	40	17	398
Yakutat	2000	145	87	34	35	3	54	27	386
Yakutat	2015	93	47	49	33	4	12	25	262

<b>WP20–11 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-11 requests a customary and traditional use determination for brown bears in in Units 1, 3, 4, and 5 by rural residents of Units 1 through 5. <i>Submitted by: Southeast Alaska Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<p><b>Customary and Traditional Use Determination—Brown Bear</b></p> <p><i>Units 1, 3, 4, and 5      Rural residents of Units 1, 2, 3, 4, and 5</i></p> <p><i>Unit 1A                      Rural residents of Unit 1A, excluding residents of Hyder</i></p> <p><i>Unit 1B                      Rural residents of Unit 1A, Petersburg, and Wrangell, excluding residents of Hyder</i></p> <p><i>Unit 1C                      Rural residents of Unit 1C, Haines, Hoonah, Kake, Klukwan, Skagway, and Wrangell, excluding residents of Gustavus</i></p> <p><i>Unit 1D                      Rural residents of Unit 1D</i></p> <p><i>Unit 3                        All rural residents</i></p> <p><i>Unit 4                        Rural residents of Unit 4 and Kake</i></p> <p><i>Unit 5                        Rural residents of Yakutat</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Oppose</b>

**DRAFT STAFF ANALYSIS  
WP20-11**

**ISSUES**

Proposal WP20-11, submitted by the Southeast Alaska Subsistence Regional Advisory Council, asks the Federal Subsistence Board (Board) to recognize customary and traditional uses of brown bears in Units 1, 3, 4, and 5 by rural residents of Units 1 through 5 (brown bears are not observed in Unit 2).

**DISCUSSION**

The Council states that customary and traditional use determinations carried over from State management were inappropriately narrow. Residents of Southeast Alaska and the Yakutat area have a long history of obtaining large wildlife resources from throughout the region. Subsistence users frequently travel far from home within the region to obtain subsistence resources, and this is a pattern that has been practiced both traditionally and contemporarily. Subsistence users access these areas by plane, boat, vehicle, and alternative terrain vehicles (ATVs). Brown bears provide not only nutritional value for families, but for many, there is a deeply seated cultural connection. Subsistence users have passed hunting, processing, and preservation knowledge down for generations. This resource is also frequently shared within and among Southeast Alaska communities and sustains the mixed subsistence-cash economy. Harvest and sharing of this species in recent times has been frequently documented in subsistence harvest surveys, harvest ticket reporting, and in testimony at Council meetings and local State advisory committee meetings. There is additional data available in published literature from various authors. It is clear that a long-term pattern of use throughout the region exists for this species and that rural residents of Southeast Alaska continue to rely on them to meet their subsistence needs. This species provides substantial cultural, economic, social, and nutritional elements to meet subsistence needs.

**Existing Federal Regulation**

**Customary and Traditional Use Determination—Brown bear**

<i>Unit 1A</i>	<i>Rural residents of Unit 1A, excluding residents of Hyder</i>
<i>Unit 1B</i>	<i>Rural residents of Unit 1A, Petersburg, and Wrangell, excluding residents of Hyder</i>
<i>Unit 1C</i>	<i>Rural residents of Unit 1C, Haines, Hoonah, Kake, Klukwan, Skagway, and Wrangell, excluding residents of Gustavus</i>
<i>Unit 1D</i>	<i>Rural residents of Unit 1D</i>
<i>Unit 3</i>	<i>All rural residents</i>
<i>Unit 4</i>	<i>Rural residents of Unit 4 and Kake</i>
<i>Unit 5</i>	<i>Rural residents of Yakutat</i>

**Note:** Brown bears are not found in Unit 2.

## Proposed Federal Regulation

### Customary and Traditional Use Determination—Brown bear

<i>Units 1, 3, 4, and 5</i>	<i>Rural residents of Units 1, 2, 3, 4, and 5</i>
<i>Unit 1A</i>	<i>Rural residents of Unit 1A, excluding residents of Hyder</i>
<i>Unit 1B</i>	<i>Rural residents of Unit 1A, Petersburg, and Wrangell, excluding residents of Hyder</i>
<i>Unit 1C</i>	<i>Rural residents of Unit 1C, Haines, Hoonah, Kake, Klukwan, Skagway, and Wrangell, excluding residents of Gustavus</i>
<i>Unit 1D</i>	<i>Rural residents of Unit 1D</i>
<i>Unit 3</i>	<i>All rural residents</i>
<i>Unit 4</i>	<i>Rural residents of Unit 4 and Kake</i>
<i>Unit 5</i>	<i>Rural residents of Yakutat</i>

### Extent of Federal Public Lands

Federal public lands comprise approximately 88% of Southeast Alaska Units 1–5. Details by unit are shown in **Table 1**, below. In Southeast Alaska, the Tongass National Forest comprises U.S. Forest Service lands. Glacier Bay National Park and Preserve and Wrangell-St. Elias National Park and Preserve comprise National Park Service lands. Glacier Bay National Park is closed to subsistence uses, but Glacier Bay National Preserve is open to subsistence uses.

There are special requirements for National Park Service Lands. Under the guidelines of the Alaska National Interest Conservation Act, National Park Service regulations identify qualified local rural subsistence users in National Parks and Monuments: (1) by identifying resident zone communities, which include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) by identifying and issuing subsistence use permits to individuals residing outside of these resident zone communities who have a personal or family history of subsistence uses.

### Regulatory History

At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Board adopted the State’s customary and traditional use determinations into permanent regulations. Unit 1 had no determination for brown bears except “no subsistence” for residents of Wrangell, Klukwan, Haines, and

**Table 1.** Percentage of Federal public lands in the Southeast Alaska Region Units 1, 2, 3, and 4, by Federal management agency.

Wildlife Management Unit	Percentage Federal Public Lands	Percentage 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
1D	43.8%	24.9% National Park Service 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
5A	94.5%	63.3% U.S. Forest Service 31.2% National Park Service
5B	96.0%	93.8% National Park Service 2.1% Bureau of Land Management 0.1% U.S. Forest Service

Skagway. The customary and traditional use determinations for brown bears in Units 3, 4, and 5 remain the same as when the Board adopted them from State regulations in 1992 (57 FR 22958, May 29, 1992).

In 1996, Proposals WP96-02 and WP96-08 requested a customary and traditional use determination for brown bears in Unit 1 to include rural residents of Wrangell, Klukwan, Haines, and Skagway. The Board adopted the Southeast Council's modification, which was the following: Unit A, rural residents of Unit 1A except no subsistence for residents of Hyder; Unit 1B, rural residents of Unit 1A, Petersburg, and Wrangell, except no subsistence for residents of Hyder; Unit 1C, rural residents of Unit 1C, Haines, Hoonah, Klukwan, Skagway, and Wrangell, except no subsistence for residents of Gustavus; and Unit 1D, rural residents of Unit 1D (61 FR 39702 (July 30, 1996)).

In 1998, Proposal WP98-04, submitted by the Petersburg Ranger District, requested to add rural residents of Kake to the customary and traditional use determination for brown bears in Unit 1C south of Bishop Point. The Board adopted the Southeast Council's modification and added Kake to the determination in all of Unit 1C (63 FR 35336, June 29, 1998).

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process and present recommendations for regulatory changes (Salazar 2010). During this review in 2016, the Southeast Alaska Council described its view. For example, the Southeast Alaska Council requested, among other things, that the Board adopt customary and traditional use determinations broadly (Bangs 2016:2). The Board responded that the Southeast Alaska Council's recommendation regarding customary and traditional use determinations aligned well with the current process followed statewide in the Federal Subsistence Management Program (Towarak 2016: 5). The Council intends to submit regulatory proposals to the Board requesting to broaden the complex web of customary and traditional use determinations that currently exist in Southeast Alaska (Bangs 2016: 2). The Council has requested, and the Board has adopted, customary and traditional use

determinations for all fish (Proposal FP19-17) and for deer (Proposal WP18-02) that include all rural residents of Southeast Alaska. This has greatly simplified these determinations that were originally adopted from State regulations at the formation of the Federal Subsistence Management Program in 1992.

## **Background**

“Southeast Alaska brown bears primarily inhabit the islands north of Frederick Sound, including Admiralty, Baranof, and Chichagof islands, and the coastal mainland, although they exist in low densities on other islands separated from the mainland by relatively short water crossings. Examples include Wrangell, Etolin, Deer, and Mitkof islands in Unit 3” (Bethune 2015:1). The majority of brown bear harvests each year in Southeast Alaska occur on Admiralty, Baranof, and Chichagof islands in Unit 4. Using motorized land vehicles to assist with brown bear hunting is prohibited in Northeast Chichagof Island Controlled Use Area in Unit 4. Three other areas in Unit 4 are closed to enhance brown bear viewing, Seymour Canal Closed Area on eastern Admiralty Island, Salt Lake Closed Area near Angoon, and Port Althorp Closed Area near Elfin Cove (Bethune 2015, Lowell 2015, Mooney 2015, and Sell 2015).

During the Russian Period in Alaska, the Russian American Company exported brown bear skins to St. Petersburg and Asia (Bockstoce 2009). Market hunting, primarily through trapping, occurred prior to a 1925 ban (Thornton 1992). Currently, Federal regulations allow the sale of handicrafts made from brown bears legally harvest in Units 1–5 (CFR §100.25(j)).

Brown bears were legally defined as game animals in 1908. From that year on, seasons have generally been from fall (September or October) through early summer (May or June). Beginning in 1989, there have been two separate seasons each year, one in the fall (September through November or December) and one in the spring (March or April through May or June). Harvest limits throughout the region are one brown bear every four regulatory years. Since 1960, hunters have been required to seal their harvests, and the hide (with claws attached) and skull must be salvaged. Since 1990 hunters have also been required to obtain registration permits before hunting in Units 1 and 4 (or a drawing permit in Unit 4), and since 2005 in Units 3 and 5. The State implemented a Unit 3 brown bear hunt for the first time in 2005. Additionally, a Federal registration permit has been available for hunting brown bears in Unit 5 since 2005. The edible meat of brown bears harvested with Federal permits must be salvaged (CFR §100.25(j)). Hunters do not need to seal brown bears taken with Federal permits in Unit 5, unless they are removed from the unit (CFR §100.25(j)(3)). However, only six Federal permits have been used in Unit 5, reporting harvests of two brown bears (OSM 2019). Federal permits are available only for hunting in only Unit 5.

## **Community Characteristics**

The rural area of Southeast Alaska is comprised of about 33 small to medium sized communities, ranging in population from 20 or less (Point Baker, Elfin Cove, and Game Creek) to over 8,000 (Sitka) (**Table 2**, U.S. Bureau of the Census 1995, ADLWD 2017, and ADCCED 2017). Many were established by Tlingit Indians and are situated at historical village sites or were established by Haida Indians (Hydaburg and

**Table 2.** The number of people living in Southeast Alaska communities, 1960-2010, based on the U.S. Census, NA=not available, *Italic*=estimated (Source: ADLWD 2017, ADCCED 2017, and U.S. Bureau of the Census 1995).

Unit of residence	Community	1960	1970	1980	1990	2000	2010	Number of households
1A	Hyder	32	49	77	99	97	87	47
	Metlakatla	1,135	1,245	1,333	1,464	1,375	1,405	469
	Saxman	153	135	273	369	431	411	120
1C	Gustavus	107	64	98	258	429	442	199
1D	Haines borough	<i>1,000</i>	1,504	1,680	2,117	2,392	2,508	991
	Klukwan	112	103	135	129	139	95	44
	Skagway	659	675	814	692	862	920	410
2	Coffman Cove	0	0	193	186	199	176	89
	Craig	273	272	527	1,260	1,397	1,201	523
	Edna Bay	135	112	6	86	49	42	19
	Hollis CDP	0	0	0	111	139	112	55
	Hydaburg	251	214	298	384	382	376	133
	Kasaan	36	30	25	54	39	49	17
	Klawock	251	213	318	722	854	755	313
	Naukati Bay	0	0	0	93	135	113	60
	Point Baker	0	80	90	39	35	15	8
	Port Protection	0	0	40	62	63	48	26
	Thorne Bay	0	443	377	569	557	471	214
	Whale Pass	0	0	90	75	58	31	20
3	Kake	455	448	555	700	710	557	246
	Kupreanof	26	36	47	23	23	27	15
	Petersburg borough	1,502	2,042	2,821	3,207	3,224	2,948	1,252
	Wrangell borough	2,165	2,358	2,658	2,479	2,448	2,369	1,053
4	Angoon	395	400	465	638	572	459	167
	Elfin Cove	0	49	28	57	32	20	15
	Game Creek	0	0	0	61	35	18	10
	Hoonah	686	748	680	795	860	760	300
	Pelican	135	133	180	222	163	88	70
	Port Alexander	18	36	86	119	81	52	22
	Sitka borough	3,237	6,109	7,803	8,588	8,835	8,881	3,545
	Tenakee Springs	109	86	138	94	104	131	72
Whitestone	0	0	NA	164	116	114	30	
5A	Yakutat borough	230	190	449	534	808	662	270
<b>TOTAL</b>		<b>13,102</b>	<b>17,774</b>	<b>22,284</b>	<b>26,450</b>	<b>27,643</b>	<b>26,343</b>	<b>10,824</b>

Kasaan) or Tsimshian Indians (Metlakatla). Population growth in Southeast Alaska during the historical period (beginning about 1750) has been affected by several waves of in-migration, first by Russian fur traders who established Sitka as their headquarters in the late 1700s. After the sale of Alaska to the United States in 1867, new industries (such as commercial fishing, canneries, and mining) and commercial trade, were pursued with the associated influx of outsiders (Worl 1990). Beginning in the 1970s, timber logging camps sprang up and some have persisted as new communities, such as Game Creek and Thorne Bay (Ellanna and Sherrod 1986). Many rural communities in Southeast Alaska have at their core a kwaan or tribe of Alaska Natives. The kwaan territories mapped in 1947 by Goldschmidt and Haas covered all of Southeast Alaska (Goldschmidt and Haas 1998).

Since 1960, the rural population of Southeast Alaska has doubled from 13,102 people in 1960 to 26,343 people in 2010 (**Table 2**). Some of this growth has been from new communities established near logging activities, growth in the recreation industry, and natural growth (Cervený 2005).

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

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

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



## Introduction

If the proposal requests to add communities or residents of areas to an existing customary and traditional use determination, as in Units 1, 3, 4, and 5 of this proposal, then the analyst focuses on the communities or residents of the areas identified in the proposal.

If a proposal is received requesting a customary and traditional use determination where none has been made previously for the resource, as in Unit 3 of this proposal, the analyst evaluates use by all rural residents who may harvest the resource within the geographic boundaries defined by the proponent in the request.

## Harvest Reporting System

One source of harvest data are State sealing records. **Appendix Table 1-1** shows that over half of reported brown bears harvested in Southeast Alaska was harvested by nonresidents of Alaska (5,333 out of 9,463 brown bears, 56%) hunting primarily in Unit 4 (72% of the nonresident harvest), based on State sealing records from 1972 to 2018 cumulative (OSM 2019; Scott 2019, pers. comm.). These records do not include the numbers of attempts to take bears as opposed to actually harvesting one, so neither the success rate nor the communities whose residents were unsuccessful in taking brown bears is shown. Additionally, people from all over Alaska have taken brown bears in Southeast Alaska. It is clear that residents of rural Southeast Alaska communities are responsible for much of the take (1,894 out of 9,463 brown bears, about 20%).

Another source of harvest data are State permit returns. **Appendix Tables 1-2 through 1-9** show the number of hunters and the number of brown bears harvested based on hunter reports on returned State permits. The data extends back to 1991 except in Units 3 and 5 where data extends back to 2005. The overall pattern of harvest from permit reports and from sealing records are similar, and most harvests are reported in Unit 4. More specific details of the harvest pattern such as the portion of harvest taken by rural Southeast communities in each subunit is different, likely a result of the different historical depth of data from one reporting method to the other.

Looking at returned permits has an added benefit over sealing records by reporting hunter effort as well as hunter success. Competition with other hunters occurs in every unit but more so in Units 1A, 1D, 4, and 5A. In these units, over half of all hunters are not from rural Southeast communities, based on permit reports shown in **Appendix 1** tables. Competition may be depressing hunting effort by some rural Southeast communities in those areas.

Rural residents from throughout Southeast Alaska are represented in hunter effort in each unit. For example, rural communities situated in each of Units 1–4 have demonstrated hunting efforts in each of Units 1A, 1B 1C, 4, and 5A, based on sealing records and permit reports presented in **Appendix 1**. Yakutat, situated in Unit 5A, is separated from the rest of Southeast Alaska by a long expanse of coastline, and still demonstrates hunting effort in Units 1C, 1D, 3, 4, as well as nearby Units 5A and 5B.

Hunter efforts and harvests is much less in two areas, Units 3 and 5B. Brown bears are not common in Unit 3; however, the State initiated a legal hunting season in 2005 and some harvests have been reported.

It is likely that if the brown bear population expands in this area, then more rural Southeast residents will demonstrate efforts to harvest brown bears there. Brown bear populations are limited in Unit 5B by the Malaspina Glacier covering most of the area (see **Appendix 1** tables).

Organized communities are not present in Units 1B and 5B, and instead, hunting effort is occasionally reported by people living outside of an organized community in Unit 1B, for example. Lower human populations in these and other areas of the region is limiting demonstrated hunter effort from those areas (see **Appendix 1** tables).

### Brown Bear Use in Southeast Alaska

Brown bears predate human occupancy and use of Southeast Alaska, as indicated by paleontological work in caves on Prince of Wales Island, where brown bear remains dating to about 35,000 years ago have been recovered. The oldest human remains found in Southeast Alaska so far, also from these caves, date to almost 10,000 years ago (Heaton et al. 1996). It is likely that indigenous people of Southeast Alaska have used brown bears wherever available for at least several thousand years. Ethnographic data show that Tlingit, Haida and Tsimshian people harvested brown bear for food and other purposes since before historic contact and have continued to use it through to the present day (de Laguna 1972, Niblack 1970, Oberg 1973, Thornton 1992).

In Southeast Alaska, the harvest of fish, wildlife, and plants follows a yearly cycle that is primarily based on the seasonal appearances of different resources. This seasonal round is a regular pattern, although some fluctuation occurs from year to year depending on the availability of certain species and weather conditions. The knowledge of these seasonal fish, wildlife, and plant harvesting opportunities is widely shared throughout the community (Firman and Bosworth 1990). In more recent times, wage employment and regulations have influenced the timing of harvests. Alaska Native hunters in Southeast Alaska traditionally pursued brown bears throughout the year, with peak hunting periods in late winter, spring, late summer, and early fall (Thornton 1992). Brown bears were taken primarily in the spring for their meat and hides with hunters concentrating in the alpine and lowland areas where bears came to feed on grasses and roots. Fall bears were prized for their fat and were pursued often along streams where they concentrated to feast on salmon. Occasionally brown bears were hunted in their dens during the winter months, or taken incidentally during the summer fishing season (ADF&G 1992).

Brown bear, or *xóots* in Tlingit, *xúuj* in Haida, and *mashgm'ol* in Tsimshian, hunting is a well-documented Tlingit, Haida, and Tsimshian tradition (Edwards 2009, Lacher 2010, and Roberts 2009). In the past, Tlingits preferred to hunt brown bears in groups of hunters, often with dogs. Implements used included spears, snares, deadfalls, traps, and bow and arrows (ADF&G 1992: de Laguna 1990). After firearms were introduced, most bears were taken with guns. Bear hunting was and is considered dangerous, as hunters are sometimes attacked or otherwise injured by bears (Thornton 1992). Market hunting, primarily through trapping, occurred prior to a 1925 ban. Prices went up to 50 dollars per pelt in the early 20th century (Thornton 1992). Today, 30-30 and similar caliber rifles, common before World War II, have given way to higher powered guns. Scopes and binoculars are widely available, providing greater effectiveness. Some other traditional, and quite effective, methods have long been outlawed by

Federal and State regulations. These include the use of dogs, pits, snares, deadfalls, and traps (Thornton 1992).

Rural communities in the region have a history of hunting and fishing near communities as well as fairly distantly from communities (Firman and Bosworth 1990). Modern technologies have increased the ease of access to some hunting areas (Thornton 1992), though the relationship between that and extension or shift in traditional hunting areas is not clear. Technological developments related to access have influenced modern bear hunting practices.

Traditional hunting areas and beliefs associated with brown bears are still important in many communities. In Tlingit tradition, a brown bear's spirit was considered to be especially powerful. After a brown bear was killed, certain observances were mandated in order to avoid angering the bear's spirit. Honor was paid to the bear through words and songs. Failure to show proper respect to the bear might prove harmful to the hunter and his family, as the bear's spirit or other bears might seek revenge for any abuse. After appeasing the bear's spirit and its kindred bears with words of thanks and praise, the hunter conducted a short ceremony before skinning it in order to insure good weather for drying the hide. It was especially important to handle the bear's head properly. For the majority of Tlingits, the custom was to bring the head back to camp where it was decorated with eagle feathers, painted red, and warmed by the fire. At Sitka in 1894, Emmons (1991) observed that "two brown bears were killed, and when the skins were stretched to dry, eagle down was put on the heads so that their spirits would feel honored." One might also speak to the bear's head as if to a human being, saying, for example, "I am your friend. I am poor and come to you." Songs were sung to honor the bear and appease its spirit. In recent years such handling rituals have declined, although the songs still may be performed on ceremonial occasions (Thornton 1992).

Traditionally, the only way to preserve bear meat was to smoke and dry it, although most recently it has been canned, frozen, or salted in barrels. Occasionally other foods, such as berries and shellfish, were preserved in bear fat (Thornton 1992). While it is clear that brown bears were hunted consistently in the past, its traditional role as a food source in the subsistence economy is less clear. Some sources suggest that consumption of meat was taboo; others state that it was eaten regularly. There is also some evidence to suggest that bears may have been a buffer resource during times when other resources were scarce because of their seasonal availability and the large quantities of meat and fat that they could provide (Thornton 1992).

Brown bears have played an important role in the subsistence economies and social life of Southeast Alaska communities for centuries. Brown bears were hunted for meat and hides, and other parts of the bear were fashioned into such things as tools, amulets, and ceremonial regalia. While the subsistence harvest and consumption of brown bears appears to have declined in recent years in Southeast Alaska, some Natives still consume its meat and fat, and other parts of the bear continue to be utilized for ceremonial purposes. Moreover, the cultural significance of brown bear in Southeast Alaska Natives' social and ceremonial life remains strong (Thornton 1992).

Brown bear symbols are an important component of traditional regalia, stories told from generation to generation, and in representational art. Clans are at the center of Tlingit social organization, and the *Teikweidee*, specifically named "Brown Bear Clan," acquired that name at a peace ceremony given by the

brown bears. Angoon Tlingits often refer to themselves as *Xootsnuwuwedi*, People of the Brown Bear Fort. Part of Admiralty Island is now recognized as Kootznoowoo (Fortress of the Bears) Wilderness because of the large population of brown bears there (Thornton 1992).

Alaska is a prime location for trophy bear hunting because brown bear populations in the Lower 48 states do not allow for extensive hunting. Since the 1930s, Alaska's non-Native population has increased steadily and the state has become more accessible to both resident and nonresident sport hunters seeking big game trophies (Thornton 1992). Today sport and trophy hunters are responsible for the majority of known brown bear harvests.

Brown bear meat, fat, and other parts were and continue to be distributed through kin and community networks. Brown bear is an especially important part of "parties" associated with Tlingit mortuary and funerary ceremonies. People sharing their harvests of wild resources is a predominant feature of subsistence economies in Alaska. **Table 3** indicates these high levels of sharing occurs in rural Southeast Alaska communities. A large majority of households share, either through giving or receiving, based on household surveys conducted since the 1980s (ADF&G 2019). Rural residents of Southeast Alaska depend on a diverse assortment of fish and wildlife resources including fish, shellfish, birds, bird eggs, large and small land mammals, marine mammals, berries, plants, and seaweed (**Table 4**).

### **Effects of Proposal**

If Proposal WP20-11 is adopted, those eligible to hunt brown bears under Federal regulations in Southeast Alaska will increase to include all rural Southeast residents, residents of Units 1–5, except in Unit 3 where it will be reduced from all rural residents of Alaska to only rural Southeast residents, residents of Units 1–5.

### **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP20-11.

#### **Justification**

Rural residents of Southeast Alaska Units 1–5 have demonstrated customary and traditional uses of brown bears in Southeast Alaska, in Units 1, 3, 4, and 5, according to hunting documentation and ethnographic descriptions. At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Board adopted a patchwork of State customary and traditional use determinations into permanent regulations that overlooked many rural Southeast communities and their subsistence uses (72 FR 22961, May 29, 1992).

Brown bears have traditionally been used in Southeast Alaska as an important source of food, clothing, grease, and fat. There is a long history of harvesting brown bears for their furs (Bockstoe 2009, ADF&G 1992, Thornton 1992, Firman and Bosworth 1990). The commercial use of brown bears is generally no longer legal.

**Table 3.** The estimated harvest in pounds edible weight and sharing of wild resources for subsistence in rural Southeast communities during one year study periods between 1983 and 2015, based on household surveys (Source: ADF&G 2019).

Unit of residence	Community	Study year	1,000 of pounds harvested	Pounds per person harvest	% of HHs using	% of HHs harvesting	% of HHs giving	% of HHs receiving
1	Gustavus	1987	37	241	100%	100%	90%	90%
1	Haines	1983	240	126	97%	88%	42%	78%
1	Haines	1987	158	97	93%	83%	67%	85%
1	Haines	1996	421	196	98%	91%	72%	97%
1	Haines	2012	260	135	99%	90%	71%	90%
1	Hyder	1987	27	345	97%	91%	33%	76%
1	Klukwan	1983	26	170	100%	97%	64%	70%
1	Klukwan	1987	32	238	100%	95%	74%	100%
1	Klukwan	1996	68	608	100%	94%	90%	100%
1	Metlakatla	1987	109	70	100%	77%	53%	99%
1	Meyers Chuck	1987	12	414	100%	100%	60%	80%
1	Saxman	1987	24	94	97%	83%	45%	95%
1	Saxman	1999	124	217	97%	79%	70%	92%
1	Skagway	1987	28	48	96%	68%	38%	93%
2	Coffman Cove	1987	34	183	97%	88%	53%	90%
2	Coffman Cove	1998	59	276	100%	98%	78%	86%
2	Craig	1987	219	185	97%	91%	70%	88%
2	Craig	1997	407	231	99%	90%	16%	91%
2	Edna Bay	1987	33	479	100%	100%	100%	100%
2	Edna Bay	1998	20	383	100%	100%	58%	58%
2	Hollis	1987	15	183	100%	88%	59%	93%
2	Hollis	1998	26	169	96%	91%	67%	74%
2	Hydaburg	1987	128	336	100%	91%	75%	93%
2	Hydaburg	1997	155	384	100%	90%	80%	100%
2	Hydaburg	2012	176	531	100%	98%	90%	98%
2	Kasaan	1987	7	182	100%	100%	86%	100%
2	Kasaan	1998	20	452	100%	100%	93%	100%
2	Klawock	1984	106	223	100%	97%	83%	81%
2	Klawock	1987	195	247	100%	96%	62%	83%
2	Klawock	1997	407	320	100%	91%	77%	94%
2	Naukati Bay	1998	35	242	98%	94%	66%	90%
2	Point Baker	1987	12	346	100%	100%	90%	95%
2	Point Baker	1996	14	289	100%	100%	75%	100%
2	Port Protection	1987	18	304	100%	100%	80%	96%
2	Port Protection	1996	44	451	100%	92%	76%	96%
2	Thorne Bay	1987	90	189	100%	97%	66%	87%
2	Thorne Bay	1998	93	179	93%	91%	61%	57%
2	Whale Pass	1987	9	179	100%	100%	72%	67%
2	Whale Pass	1998	10	185	100%	100%	80%	100%
2	Whale Pass	2012	14	247	100%	100%	67%	76%
3	Beecher Pass	1987	21	477	100%	100%	100%	100%
3	Kake	1987	105	163	97%	91%	66%	91%

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**Table 3.** The estimated harvest in pounds edible weight and sharing of wild resources for subsistence in rural Southeast communities during one year study periods between 1983 and 2015, based on household surveys. *Continued from previous page*

Unit of residence	Community	Study year	1,000 of pounds harvested	Pounds per person harvest	% of HHs using	% of HHs harvesting	% of HHs giving	% of HHs receiving
3	Kake	1996	134	179	99%	85%	75%	96%
3	Petersburg	1987	739	198	97%	94%	87%	93%
3	Petersburg	2000	475	161	94%	78%	55%	87%
3	Wrangell	1987	441	155	95%	80%	63%	90%
3	Wrangell	2000	328	168	94%	81%	65%	89%
4	Angoon	1984	134	216	97%	97%	74%	87%
4	Angoon	1987	127	244	100%	99%	84%	93%
4	Angoon	1996	130	224	97%	93%	68%	95%
4	Elfin Cove	1987	16	263	100%	100%	92%	100%
4	Game Creek	1996	12	187	100%	100%	83%	100%
4	Hoonah	1987	269	385	100%	95%	84%	100%
4	Hoonah	1996	331	372	97%	95%	78%	90%
4	Hoonah	2012	251	343	98%	90%	85%	96%
4	Hoonah	2016	175	237	100%	94%	88%	98%
4	Pelican	1987	85	355	100%	92%	78%	99%
4	Port Alexander	1987	33	312	100%	100%	86%	94%
4	Sitka	2013	119	175	99%	91%	76%	92%
4	Tenakee Spr	1984	23	250	96%	88%	79%	92%
4	Tenakee Spr	1987	31	330	100%	90%	68%	97%
4	Whitestone	1996	25	178	100%	96%	50%	67%
5	Yakutat	1984	200	369	100%	98%	86%	98%
5	Yakutat	1987	234	398	96%	96%	99%	93%
5	Yakutat	2000	245	386	100%	95%	89%	99%
5	Yakutat	2015	155	262	99%	93%	87%	97%

**Table 3.** The estimated harvest of wild resources for subsistence, in pounds edible weight per person, by rural Southeast communities, during one year study periods between 1983 and 2015, based on household surveys (Source: ADF&G 2018).

Community	Study year	Salmon	Non-salmon fishes	Land mammals	Marine mammals	Birds and eggs	Marine invertebrates	Plants and berries	Total
Angoon	1984	74	46	58	17	1	13	8	216
Angoon	1987	71	35	73	32	1	26	7	244
Angoon	1996	82	48	51	9	0	30	4	224
Angoon	2012	37	53	51	5	0	22	13	183
Beecher Pass	1987	131	108	109	0	23	93	13	477
Coffman Cove	1987	52	56	60	1	1	9	5	183
Coffman Cove	1998	63	83	66	1	3	49	11	276
Craig	1987	40	62	42	5	1	29	6	185
Craig	1997	65	63	47	10	1	29	19	232
Edna Bay	1987	99	135	147	0	4	67	26	479
Edna Bay	1998	55	186	90	0	0	16	36	383
Elfin Cove	1987	81	59	72	0	0	24	27	263
Game Creek	1996	27	54	47	0	3	36	20	187
Gustavus	1987	55	82	64	0	2	28	10	241
Haines	1983	46	33	34	1	3	3	5	126
Haines	1987	28	37	23	0	1	4	5	97
Haines	1996	58	81	29	1	1	11	15	196
Haines	2012	47	38	28	0	1	12	10	135
Hollis	1987	44	35	42	0	1	49	11	183
Hollis	1998	40	31	40	0	0	53	6	169
Hoonah	1985	47	40	58	21	1	22	21	210
Hoonah	1987	100	78	90	53	1	49	13	385
Hoonah	1996	113	67	81	23	1	58	30	372
Hoonah	2012	72	120	52	13	2	41	44	343
Hydaburg	1987	137	83	43	7	1	51	14	336
Hydaburg	1997	117	109	35	3	1	101	19	384
Hydaburg	2012	214	133	68	5	0	83	27	531
Hyder	1987	121	86	32	8	6	85	7	345
Kake	1985	69	46	27	26	1	19	29	218
Kake	1987	35	33	39	23	1	18	15	163
Kake	1996	44	42	52	10	1	22	9	179
Kasaan	1987	32	32	40	2	0	69	6	182
Kasaan	1998	93	184	70	25	0	61	19	452
Klawock	1984	69	58	36	14	1	28	18	223
Klawock	1987	75	72	47	5	1	40	7	247
Klawock	1997	105	78	54	21	1	37	24	320
Klukwan	1983	114	33	14	2	1	0	6	170
Metlakatla	1987	20	17	11	1	1	15	5	70
Meyers Chuck	1987	105	174	48	0	9	64	14	414
Naukati Bay	1998	49	73	51	1	2	54	12	242
Pelican	1987	60	119	111	8	1	47	9	355
Petersburg	1987	45	44	57	0	4	39	9	198

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**Table 4.** The estimated harvest of wild resources for subsistence, in pounds edible weight per person, by rural Southeast communities, during one year study periods between 1983 and 2015, based on household surveys. *Continued from previous page*

Community	Study year	Salmon	Non-salmon fishes	Land mammals	Marine mammals	Birds and eggs	Marine invertebrates	Plants and berries	Total
Petersburg	2000	60	42	17	0	1	37	4	161
Point Baker	1987	89	66	101	0	3	66	20	346
Point Baker	1996	82	89	47	0	0	58	12	289
Port Alexander	1987	70	70	108	3	1	31	28	312
Port Protection	1987	111	88	41	0	2	43	19	304
Port Protection	1996	59	111	101	9	2	139	30	451
Saxman	1987	33	19	20	2	0	14	4	94
Saxman	1999	84	47	29	12	0	23	23	217
Sitka	1987	39	43	38	1	1	18	5	145
Sitka	1996	58	54	51	7	1	27	7	205
Sitka	2013	46	68	26	3	0	19	12	175
Skagway	1987	18	16	4	0	0	9	2	48
Tenakee Springs	1984	71	42	65	4	0	61	7	250
Tenakee Springs	1987	49	82	135	8	2	43	11	330
Thorne Bay	1987	48	73	40	0	1	24	4	189
Thorne Bay	1998	62	37	36	11	1	26	6	179
Whale Pass	1987	41	37	60	2	1	33	5	179
Whale Pass	1998	28	36	51	0	0	57	13	185
Whale Pass	2012	52	76	80	0	13	24	3	247
Whitestone	1996	21	71	57	0	1	23	5	178
Wrangell	1987	30	43	32	7	1	38	4	155
Wrangell	2000	26	34	39	0	1	60	8	168
Yakutat	1984	129	82	52	24	10	46	26	369
Yakutat	1987	216	77	15	31	2	40	17	398
Yakutat	2000	145	87	34	35	3	54	27	386
Yakutat	2015	93	47	49	33	4	12	25	262

Several other factors have affected long-term patterns of brown bear use by rural Southeast residents. Hunting documentation and ethnographic accounts reveal that there is a history of hunting nearby their communities. However, they also travel fairly distantly. These decisions on how far to travel are influenced by factors such as availability of brown bears, availability of faster, larger boats, visits to clan mates and friends in distant communities, et cetera. People in Southeast Alaska travel from home to other communities for many reasons such as to visit family and friends, to harvest wild resources, for potlatches and other cultural celebrations, and to return to traditional clan and kwaan territories. At these times, they need to be able to continue long-standing patterns of hunting (ADF&G 1992, Thornton 1992, Firman and Bosworth 1990).

Another factor possibly affecting patterns of brown bear use is competition with other hunters. The proportion of rural Southeast residents using Units 1A, 1D, 4, and 5A to hunt is much smaller than for the group of other hunters who visit these areas in larger numbers, a factor that may dissuade area residents



from traveling to these areas to hunt (see **Appendix 1** tables). Additionally, brown bears are rare in Unit 5B because it is dominated by the Malaspina Glacier and therefore few harvests have been reported there.

While rural residents of Yakutat in Unit 5A are distant from most other rural Southeast Alaska communities, multiple harvests by them throughout the region are demonstrated. Further, a harvestable surplus of brown bears has existed in Unit 3 since 2004 when the State implemented a hunt there, and Unit 3 brown bears, which are not included in the current customary and traditional use determination, should be included in the regulation, as was requested by the proponent.

Finally, the Southeast Alaska Council has requested that the Board consider customary and traditional use determinations broadly and inclusively (Bangs 2016:2). Therefore, all rural residents of Southeast Alaska should be included in a customary and traditional use determination for brown bears in Units 1, 3, 4, and 5.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDIX 1

**Appendix Table 1-1.** State sealing records: The reported harvest of browns bears by wildlife management unit, from 1960 to 2018 cumulative (**bold**=rural Southeast community, blank cell=0) (Source: OSM 2019; Scott 2019, pers. comm.).

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 3	Unit 4	Unit 5A	Unit 5B	Total
<b>1A</b>	<b>ANNETTE</b>	<b>11</b>						<b>4</b>		<b>15</b>
<b>1A</b>	<b>HYDER</b>	<b>1</b>								<b>1</b>
1A	KETCHIKAN	125	13	3	2		45	4	2	194
<b>1A</b>	<b>METLAKATLA</b>	<b>4</b>					<b>3</b>			<b>7</b>
<b>1A</b>	<b>MEYERS CHUCK</b>	<b>3</b>	<b>1</b>							<b>4</b>
1A	WARD COVE	9	1				8			18
1A	YES BAY	1								1
<b>1B</b>	<b>BRADFIELD</b>		<b>1</b>							<b>1</b>
<b>1B</b>	<b>HOBART BAY</b>						<b>8</b>			<b>8</b>
1C	AUKE BAY			10			58	2		70
1C	DOUGLAS		1	12			61	3		77
<b>1C</b>	<b>GUSTAVUS</b>			<b>3</b>			<b>9</b>	<b>1</b>		<b>13</b>
1C	JUNEAU	1	2	178	23		736	58	9	1,007
<b>1D</b>	<b>HAINES</b>			<b>7</b>	<b>233</b>		<b>17</b>	<b>1</b>		<b>258</b>
<b>1D</b>	<b>KLUKWAN</b>				<b>3</b>					<b>3</b>
<b>1D</b>	<b>SKAGWAY</b>			<b>1</b>	<b>24</b>		<b>3</b>			<b>28</b>
<b>2</b>	<b>COFFMAN COVE</b>	<b>2</b>								<b>2</b>
<b>2</b>	<b>CRAIG</b>	<b>3</b>	<b>1</b>				<b>10</b>	<b>1</b>		<b>15</b>
<b>2</b>	<b>EDNA BAY</b>						<b>1</b>			<b>1</b>
<b>2</b>	<b>KASAAN</b>						<b>1</b>			<b>1</b>
<b>2</b>	<b>KLAWOCK</b>	<b>7</b>	<b>1</b>				<b>8</b>			<b>16</b>
<b>2</b>	<b>PORT ALICE</b>		<b>1</b>							<b>1</b>
<b>2</b>	<b>THORNE BAY</b>	<b>1</b>	<b>12</b>		<b>1</b>		<b>5</b>	<b>1</b>		<b>20</b>
<b>3</b>	<b>ANITA BAY</b>					<b>1</b>				<b>1</b>
<b>3</b>	<b>KAKE</b>						<b>9</b>			<b>9</b>
<b>3</b>	<b>PETERSBURG</b>	<b>1</b>	<b>10</b>			<b>2</b>	<b>112</b>	<b>1</b>		<b>126</b>
<b>3</b>	<b>WRANGELL</b>	<b>1</b>	<b>81</b>			<b>8</b>	<b>15</b>	<b>1</b>		<b>106</b>
<b>4</b>	<b>ANGOON</b>						<b>28</b>			<b>28</b>
<b>4</b>	<b>CANNERY COVE</b>						<b>1</b>			<b>1</b>
<b>4</b>	<b>CHATHAM CAN.</b>						<b>1</b>			<b>1</b>
<b>4</b>	<b>CUBE COVE</b>						<b>27</b>			<b>27</b>
<b>4</b>	<b>ELFIN COVE</b>						<b>6</b>			<b>6</b>
<b>4</b>	<b>FALSE ISLAND</b>						<b>4</b>			<b>4</b>
<b>4</b>	<b>GAME CREEK</b>						<b>1</b>			<b>1</b>
<b>4</b>	<b>HIDDEN FALLS</b>						<b>8</b>			<b>8</b>
<b>4</b>	<b>HOONAH</b>			<b>2</b>			<b>181</b>	<b>1</b>		<b>184</b>
<b>4</b>	<b>PELICAN</b>				<b>1</b>		<b>24</b>	<b>1</b>		<b>26</b>
<b>4</b>	<b>PRT ALEXANDER</b>						<b>17</b>			<b>17</b>
<b>4</b>	<b>PRT ARMSTRONG</b>						<b>6</b>			<b>6</b>
<b>4</b>	<b>PORT WALTER</b>						<b>1</b>			<b>1</b>
<b>4</b>	<b>PYBUS BAY</b>						<b>1</b>			<b>1</b>
<b>4</b>	<b>SITKA</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>3</b>		<b>705</b>	<b>16</b>	<b>4</b>	<b>731</b>

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**Appendix Table 1-1.** State sealing records: The reported harvest of browns bears by wildlife management unit, from 1960 to 2018 cumulative (**bold**=rural community, blank cell=0). *Continued from previous page*

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 3	Unit 4	Unit 5A	Unit 5B	Total
<b>4</b>	<b>TENAKEE SPR</b>						<b>23</b>			<b>23</b>
<b>5A</b>	<b>YAKUTAT</b>							<b>170</b>	<b>22</b>	<b>192</b>
<b>5A</b>	<b>ICY BAY</b>								<b>1</b>	<b>1</b>
6C	CORDOVA							1	1	2
6D	VALDEZ				1		2	1		4
6D	WHITTIER							1		1
7	COPPER CENTER				1		1			2
7	MOOSE PASS						2			2
7	SEWARD			1			1			2
8	KODIAK						2	1	2	5
9B	KOKHANOK							1		1
10	ADAK				1			1		2
10	DUTCH HARBOR				1				1	2
10	UNALASKA						2			2
12	NORTHWAY				3		1			4
13D	GLENNALLEN						3			3
14A	BIG LAKE							1		1
14A	PALMER						4	3		7
14A	SUTTON								1	1
14A	WASILLA	2					24	10		36
14A	WILLOW							1		1
14B	TALKEETNA						1	2		3
14C	ANCHORAGE	7	2	3	8	1	180	60	16	277
14C	CHUGIAK				1		4	3		8
14C	EAGLE RIVER			1	1		34	12	2	50
14C	EKLUTNA						1			1
14C	ELMENDORF AFB				1		18	4		23
14C	FT RICHARDSON			1			18	10	1	30
14C	GIRDWOOD							1		1
15A	COOPER LANDING						2			2
15B	KASILOF						1			1
15B	KENAI						2	4		6
15B	SOLDOTNA				1		8	5		14
15B	STERLING				1			1		2
15C	NINILCHIK						1			1
18	BETHEL						1			1
20A	CLEAR						1			1
20A	HEALY						3			3
20A	NENANA							1		1
20A	USIBELLI						1			1
20B	EIELSON AFB				8		6	5	1	20
20B	FAIRBANKS		1	2	12		82	18	2	117
20B	FT WAINWRIGHT	1			3		15	2		21
20B	NORTH POLE		1		6		16	15		38
20B	SALCHA						1	1		2

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**Appendix Table 1-1.** State sealing records: The reported harvest of browns bears by wildlife management unit, from 1960 to 2018 cumulative (**bold**=rural Southeast community, blank cell=0).  
*Continued from previous page*

Unit of Residence	Community	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 3	Unit 4	Unit 5A	Unit 5B	Total
20B	TWO RIVERS							1		1
20D	DELTA JCT			1	4		5	4		14
20D	FORT GREELY							1		1
20D	TOK			1	2		4			7
20E	CHICKEN						1			1
21D	GALENA						1			1
22C	NOME						3			3
23	AMBLER		1							1
26A	BARROW								1	1
26A	WAINWRIGHT				1					1
	UNKNOWN	4	0	10	29	1	55	36	1	136
	NONRESIDENTS	83	103	67	300	1	3,857	742	180	5,333
	GRAND TOTAL	268	234	304	675	14	6,507	1,214	247	9,463
<b>RURAL SOUTHEAST COMMUNITY ONLY</b>		<b>13%</b>	<b>47%</b>	<b>5%</b>	<b>39%</b>	<b>79%</b>	<b>19%</b>	<b>10%</b>	<b>11%</b>	<b>20%</b>



**Appendix Table 1-2.** Unit 1A: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 1A Number of hunters 1991-2018	Unit 1A Number of brown bears harvested 1991-2018
<b>1A</b>	<b>HYDER</b>	<b>5</b>	<b>0</b>
1A	KETCHIKAN	502	69
<b>1A</b>	<b>METLAKATLA</b>	<b>14</b>	<b>2</b>
<b>1A</b>	<b>NEETS BAY</b>	<b>3</b>	<b>1</b>
1A	WARD COVE	46	5
<b>1C</b>	<b>GUSTAVUS</b>	<b>1</b>	<b>0</b>
1C	JUNEAU	9	0
<b>2</b>	<b>COFFMAN COVE</b>	<b>1</b>	<b>0</b>
<b>2</b>	<b>CRAIG</b>	<b>11</b>	<b>1</b>
<b>2</b>	<b>HOLLIS</b>	<b>1</b>	<b>0</b>
<b>2</b>	<b>KLAWOCK</b>	<b>1</b>	<b>0</b>
<b>2</b>	<b>THORNE BAY</b>	<b>21</b>	<b>1</b>
<b>3</b>	<b>PETERSBURG</b>	<b>3</b>	<b>0</b>
<b>3</b>	<b>WRANGELL</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>SITKA</b>	<b>6</b>	<b>2</b>
8	KODIAK	1	0
10	UNALASKA	1	0
13E	CANTWELL	1	0
14A	SUTTON	1	0
14A	WASILLA	4	2
14A	WILLOW	2	0
14C	ANCHORAGE	12	3
14C	CHUGIAK	1	0
14C	EAGLE RIVER	1	0
20B	FAIRBANKS	6	0
20B	FORT WAINWRIGHT	1	1
20B	NORTH POLE	1	1
20D	FORT GREELY	2	0
20D	TOK	2	0
23	AMBLER	2	0
	RESIDENT, NON-AK CITY	2	0
	NONRESIDENT	179	76
	<b>GRAND TOTAL</b>	<b>844</b>	<b>165</b>
	<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>	<b>8%</b>	<b>5%</b>

**Appendix Table 1-3.** Unit 1B: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 1B Number of hunters 1991-2018	Unit 1B Number of brown bear harvested 1991-2018
1A	KETCHIKAN	20	4
<b>1A</b>	<b>METLAKATLA</b>	<b>1</b>	<b>0</b>
<b>1A</b>	<b>MEYERS CHUCK</b>	<b>2</b>	<b>1</b>
1A	WARD COVE	3	0
1C	AUKE BAY	1	0
1C	JUNEAU	7	1
<b>2</b>	<b>COFFMAN COVE</b>	<b>4</b>	<b>0</b>
<b>2</b>	<b>CRAIG</b>	<b>12</b>	<b>0</b>
<b>2</b>	<b>KLAWOCK</b>	<b>1</b>	<b>0</b>
<b>2</b>	<b>THORNE BAY</b>	<b>39</b>	<b>5</b>
<b>3</b>	<b>PETERSBURG</b>	<b>40</b>	<b>3</b>
<b>3</b>	<b>WRANGELL</b>	<b>190</b>	<b>27</b>
<b>4</b>	<b>SITKA</b>	<b>5</b>	<b>0</b>
14A	WASILLA	2	0
14C	ANCHORAGE	8	0
14C	CHUGIAK	1	0
14C	EAGLE RIVER	3	0
15A	KENAI	2	0
15C	NINILCHIK	1	0
20B	FAIRBANKS	8	1
20B	FORT WAINWRIGHT	2	0
20B	NORTH POLE	3	1
23	AMBLER	9	1
	RESIDENT NON-AK CITY	1	0
	NON-RESIDENT	184	91
	GRAND TOTAL	549	135
<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>		<b>53%</b>	<b>26%</b>

**Appendix Table 1-4.** Unit 1C: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 1C Number of hunters 1991-2018	Unit 1C Number of brown bear harvested 1991-2018
1A	KETCHIKAN	142	2
1A	WARD COVE	20	1
<b>1B</b>	<b>HOBART BAY</b>	<b>3</b>	<b>1</b>
1C	AUKE BAY	83	2
1C	DOUGLAS	32	2
<b>1C</b>	<b>GUSTAVUS</b>	<b>25</b>	<b>2</b>
1C	JUNEAU	1,320	2
<b>1D</b>	<b>HAINES</b>	<b>92</b>	<b>2</b>
<b>1D</b>	<b>KLUKWAN</b>	<b>1</b>	
<b>1D</b>	<b>SKAGWAY</b>	<b>12</b>	<b>2</b>
<b>2</b>	<b>COFFMAN COVE</b>	<b>7</b>	<b>1</b>
<b>2</b>	<b>CRAIG</b>	<b>15</b>	<b>2</b>
<b>2</b>	<b>KLAWOCK</b>	<b>8</b>	<b>1</b>
<b>2</b>	<b>THORNE BAY</b>	<b>38</b>	<b>1</b>
<b>2</b>	<b>WHALE PASS</b>	<b>1</b>	<b>1</b>
<b>3</b>	<b>KAKE</b>	<b>1</b>	
<b>3</b>	<b>PETERSBURG</b>	<b>80</b>	<b>2</b>
<b>3</b>	<b>WRANGELL</b>	<b>92</b>	<b>2</b>
<b>4</b>	<b>ANGOON</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>CUBE COVE</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>ELFIN COVE</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>HIDDEN FALLS</b>	<b>14</b>	<b>1</b>
<b>4</b>	<b>HOONAH</b>	<b>55</b>	<b>2</b>
<b>4</b>	<b>PELICAN</b>	<b>2</b>	<b>1</b>
<b>4</b>	<b>PORT ALEXANDER</b>	<b>3</b>	<b>1</b>
<b>4</b>	<b>PORT ARMSTRONG</b>	<b>11</b>	<b>1</b>
<b>4</b>	<b>PORT WALTER</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>PYBUS BAY</b>	<b>3</b>	
<b>4</b>	<b>SITKA</b>	<b>374</b>	<b>2</b>
<b>4</b>	<b>TENAKEE SPRINGS</b>	<b>1</b>	
<b>5A</b>	<b>YAKUTAT</b>	<b>41</b>	<b>1</b>
6C	CORDOVA	1	1
6D	VALDEZ	2	
7	MOOSE PASS	2	1
8	KODIAK	8	1
10	ADAK	3	
10	SHEMYA	1	
10	UNALASKA	2	1
13D	GLENNALLEN	1	
14A	BIG LAKE	3	1
14A	HOUSTON	3	1
14A	MEADOW LAKES	1	1

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**Appendix Table 1-4.** Unit 1C: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community).  
Continued from previous page

Unit of residence	Community	Unit 1C Number of hunters 1991-2018	Unit 1C Number of brown bear harvested 1991-2018
14A	PALMER	13	
14A	WASILLA	37	2
14A	WILLOW	3	
14C	ANCHORAGE	103	2
14C	CHUGIAK	13	2
14C	EAGLE RIVER	24	2
14C	FORT RICHARDSON	2	1
14C	GIRDWOOD	2	
15A	STERLING	1	1
15B	KASILOF	4	1
15B	KENAI	9	1
15B	SOLDOTNA	15	2
15C	ANCHOR POINT	2	1
15C	HOMER	4	1
18	BETHEL	4	
18	QUINHAGAK	1	
20B	EIELSON AFB	3	2
20B	ESTER	1	1
20B	FAIRBANKS	59	2
20B	FORT WAINWRIGHT	1	1
20B	NORTH POLE	27	2
20B	SALCHA	1	1
20B	TWO RIVERS	2	
20D	DELTA JCT	11	1
20D	TOK	4	
23	AMBLER	9	1
25D	FORT YUKON	2	
26A	UTQIAGVIK	2	
	RESIDENT, NON-AK CITY	20	2
	NONRESIDENT	139	18
	GRAND TOTAL	1,295	77
<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>		<b>68%</b>	<b>39%</b>

**Appendix Table 1-5.** Unit 1D: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 1D Number of hunters 1991-2018	Unit 1D Number of brown bear harvested 1991-2018
1A	KETCHIKAN	3	0
1C	AUKE BAY	1	0
1C	DOUGLAS	2	1
1C	JUNEAU	73	8
<b>1D</b>	<b>HAINES</b>	<b>556</b>	<b>75</b>
<b>1D</b>	<b>KLUKWAN</b>	<b>1</b>	
<b>1D</b>	<b>SKAGWAY</b>	<b>24</b>	<b>4</b>
<b>3</b>	<b>WRANGELL</b>	<b>2</b>	<b>0</b>
<b>4</b>	<b>ANGOON</b>	<b>1</b>	<b>0</b>
<b>4</b>	<b>PELICAN</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>SITKA</b>	<b>10</b>	<b>1</b>
6D	VALDEZ	1	1
9E	CHIGNIK	1	1
10	ADAK	1	1
10	DUTCH HARBOR	1	0
12	NORTHWAY	14	3
12	TOK	12	2
13D	COPPER CENTER	6	1
13D	GLENNALLEN	3	0
14A	PALMER	7	0
14A	WASILLA	9	0
14C	ANCHORAGE	29	2
14C	CHUGIAK	2	1
14C	EAGLE RIVER	11	1
14C	ELMENDORF AFB	6	1
15A	KENAI	2	0
15A	SOLDOTNA	3	1
15A	STERLING	1	0
15C	HOMER	3	0
15C	NINILCHIK	1	0
20A	NENANA	2	0
20B	EIELSON AFB	65	7
20B	ESTER	1	0
20B	FAIRBANKS	40	3
20B	FORT WAINWRIGHT	4	2
20B	NORTH POLE	28	4
20B	TWO RIVERS	4	0
20D	DELTA JCT	1	
20D	DELTA JUNCTION	8	4
21D	GALENA	1	0
26A	UTQIAGVIK	2	
	RESIDENT NON-AK CITY	1	0
	RESIDENCY UNKNOWN	1	0
	NONRESIDENT	420	162
	GRAND TOTAL	1,365	287
	<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>	<b>44%</b>	<b>28%</b>

**Appendix Table 1-6.** Unit 3: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 2005 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 3 Number of hunters 2005-2018	Unit 3 Number of brown bear harvested 2005-2018
1A	KETCHIKAN	3	1
<b>2</b>	<b>KLAWOCK</b>	<b>1</b>	<b>1</b>
<b>2</b>	<b>THORNE BAY</b>	<b>2</b>	<b>0</b>
<b>3</b>	<b>PETERSBURG</b>	<b>12</b>	<b>1</b>
<b>3</b>	<b>WRANGELL</b>	<b>45</b>	<b>2</b>
18	BETHEL	1	1
14A	BIG LAKE	1	0
14C	ANCHORAGE	2	1
15A	SOLDOTNA	1	1
15B	KENAI	1	0
20B	EIELSON AFB	1	1
20B	FAIRBANKS	1	0
20D	TOK	2	1
22	NOME	2	1
	NONRESIDENTS	1	1
	GRAND TOTAL	76	12
<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>		79%	33%

**Appendix Table 1-7.** Unit 4: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 4 Number of hunters 1991-2018	Unit 4 Number of brown bear harvested 1991-2018
1A	KETCHIKAN	94	23
<b>1A</b>	<b>METLAKATLA</b>	<b>1</b>	<b>0</b>
1A	WARD COVE	18	4
<b>1B</b>	<b>HOBART BAY</b>	<b>25</b>	<b>4</b>
1C	AUKE BAY	159	34
1C	DOUGLAS	94	12
<b>1C</b>	<b>GUSTAVUS</b>	<b>36</b>	<b>6</b>
1C	JUNEAU	1,815	341
<b>1D</b>	<b>HAINES</b>	<b>52</b>	<b>8</b>
<b>1D</b>	<b>KLUKWAN</b>	<b>0</b>	<b>0</b>
<b>1D</b>	<b>SKAGWAY</b>	<b>15</b>	<b>3</b>
<b>2</b>	<b>COFFMAN COVE</b>	<b>4</b>	<b>1</b>
<b>2</b>	<b>CRAIG</b>	<b>27</b>	<b>7</b>
<b>2</b>	<b>EDNA BAY</b>	<b>3</b>	<b>1</b>
<b>2</b>	<b>HYDABURG</b>	<b>4</b>	<b>0</b>
<b>2</b>	<b>KASAAN</b>	<b>3</b>	<b>1</b>
<b>2</b>	<b>KLAWOCK</b>	<b>13</b>	<b>7</b>
<b>2</b>	<b>SMITH COVE</b>	<b>3</b>	<b>2</b>
<b>2</b>	<b>THORNE BAY</b>	<b>21</b>	<b>5</b>
<b>2</b>	<b>WHALE PASS</b>	<b>1</b>	<b>1</b>
<b>3</b>	<b>KAKE</b>	<b>19</b>	<b>5</b>
<b>3</b>	<b>PETERSBURG</b>	<b>260</b>	<b>73</b>
<b>3</b>	<b>ROWAN BAY</b>	<b>1</b>	<b>0</b>
<b>3</b>	<b>WRANGELL</b>	<b>26</b>	<b>6</b>
<b>4</b>	<b>ANGOON</b>	<b>23</b>	<b>6</b>
<b>4</b>	<b>CORNER BAY</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>CUBE COVE</b>	<b>53</b>	<b>23</b>
<b>4</b>	<b>ELFIN COVE</b>	<b>9</b>	<b>3</b>
<b>4</b>	<b>FALSE ISLAND</b>	<b>2</b>	<b>2</b>
<b>4</b>	<b>GAME CREEK</b>	<b>6</b>	<b>2</b>
<b>4</b>	<b>HIDDEN FALLS HATCHERY</b>	<b>24</b>	<b>4</b>
<b>4</b>	<b>HOONAH</b>	<b>251</b>	<b>60</b>
<b>4</b>	<b>PELICAN</b>	<b>11</b>	<b>2</b>
<b>4</b>	<b>PORT ALEXANDER</b>	<b>14</b>	<b>10</b>
<b>4</b>	<b>PORT ARMSTRONG</b>	<b>12</b>	<b>5</b>
<b>4</b>	<b>PORT WALTER</b>	<b>2</b>	<b>1</b>
<b>4</b>	<b>PYBUS BAY</b>	<b>7</b>	<b>1</b>
<b>4</b>	<b>SITKA</b>	<b>1,781</b>	<b>346</b>
<b>4</b>	<b>TENAKEE SPRINGS</b>	<b>24</b>	<b>4</b>
<b>4</b>	<b>WHITESTONE CAMP</b>	<b>5</b>	<b>1</b>
<b>5A</b>	<b>YAKUTAT</b>	<b>2</b>	<b>0</b>
6C	CORDOVA	1	0

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**Appendix Table 1-7.** Unit 4: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community).  
Continued from previous page

Unit of residence	Community	Unit 4 Number of hunters 1991-2018	Unit 4 Number of brown bear harvested 1991-2018
6D	VALDEZ	10	1
6D	WHITTIER	1	0
7	COOPER LANDING	3	2
7	MOOSE PASS	3	2
7	SEWARD	1	0
8	KODIAK	7	3
9C	NAKNEK	1	0
10	ADAK	5	0
10	AKUTAN	2	0
10	SHEMYA	1	0
10	UNALASKA	5	2
12	NORTHWAY	1	0
12	TOK	5	2
13D	COPPER CENTER	3	1
13D	GLENNALLEN	5	0
14A	BIG LAKE	4	0
14A	HOUSTON	3	0
14A	KNIK	1	0
14A	MEADOW LAKES	2	1
14A	PALMER	48	3
14A	SUTTON	1	0
14A	WASILLA	92	23
14A	WILLOW	2	0
14B	TALKEETNA	4	1
14C	ANCHORAGE	347	76
14C	CHUGIAK	24	4
14C	EAGLE RIVER	78	19
14C	EKLUTNA	1	1
14C	ELMENDORF AFB	2	0
14C	FORT RICHARDSON	27	10
14C	GIRDWOOD	2	
14C	PETERS CREEK	2	1
15A	NIKISKI	1	0
15B	KASILOF	5	1
15B	KENAI	15	2
15B	SOLDOTNA	34	6
15B	STERLING	4	0
15C	ANCHOR POINT	1	0
15C	HOMER	4	1
15C	NINILCHIK	3	1
16B	SKWENTNA	1	0
18	BETHEL	14	0

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**Appendix Table 1-7.** Unit 4: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 1991 to 2018 cumulative (**bold**=rural Southeast community).  
Continued from previous page

Unit of residence	Community	Unit 4 Number of hunters 1991-2018	Unit 4 Number of brown bear harvested 1991-2018
18	QUINHAGAK	1	
20A	ANDERSON	2	0
20A	CLEAR	2	1
20A	HEALY	5	1
20A	NENANA	2	0
20B	CHATANIKA	2	0
20B	EIELSON AFB	17	5
20B	FAIRBANKS	175	39
20B	FORT WAINWRIGHT	18	6
20B	NORTH POLE	73	14
20B	SALCHA	3	1
20B	TWO RIVERS	2	0
20D	DELTA JCT	3	1
20D	DELTA JUNCTION	5	1
20E	EAGLE	1	0
21D	GALENA	1	1
22C	NOME	2	1
23	AMBLER	6	0
23	KOTZEBUE	4	0
25D	FORT YUKON	2	0
26A	BARROW	1	0
	RESIDENT, NON-AK CITY	14	6
	RESIDENCY UNKNOWN	3	0
	NONRESIDENTS	5,357	2,701
	GRAND TOTAL	11,398	3,956
	<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>	<b>24%</b>	<b>15%</b>

**Appendix Table 1-8.** Unit 5A: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 2005 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 5A Number of hunters 2005-2018	Unit 5A Number of brown bear harvested 2005-2018
1A	KETCHIKAN	139	27
1C	JUNEAU	713	120
1C	WARD COVE	22	2
<b>1D</b>	<b>HAINES</b>	<b>2</b>	<b>0</b>
<b>1D</b>	<b>KLUKWAN</b>	<b>1</b>	<b>0</b>
<b>1D</b>	<b>SKAGWAY</b>	<b>5</b>	<b>1</b>
<b>2</b>	<b>CRAIG</b>	<b>3</b>	<b>1</b>
<b>2</b>	<b>KLAWOCK</b>	<b>8</b>	<b>3</b>
<b>2</b>	<b>THORNE BAY</b>	<b>38</b>	<b>4</b>
<b>2</b>	<b>WHALE PASS</b>	<b>1</b>	<b>1</b>
<b>3</b>	<b>KAKE</b>	<b>1</b>	<b>0</b>
<b>3</b>	<b>PETERSBURG</b>	<b>79</b>	<b>18</b>
<b>3</b>	<b>WRANGELL</b>	<b>89</b>	<b>12</b>
<b>4</b>	<b>HOONAH</b>	<b>53</b>	<b>16</b>
<b>4</b>	<b>PELICAN</b>	<b>2</b>	<b>2</b>
<b>4</b>	<b>PORT ALEXANDER</b>	<b>3</b>	<b>3</b>
<b>4</b>	<b>PORT ARMSTRONG</b>	<b>11</b>	<b>5</b>
<b>4</b>	<b>PORT WALTER</b>	<b>1</b>	<b>1</b>
<b>4</b>	<b>PYBUS BAY</b>	<b>3</b>	<b>0</b>
<b>4</b>	<b>SITKA</b>	<b>373</b>	<b>93</b>
<b>4</b>	<b>TENAKEE SPRINGS</b>	<b>1</b>	<b>0</b>
<b>5A</b>	<b>YAKUTAT</b>	<b>110</b>	<b>39</b>
6D	VALDEZ	3	0
7	MOOSE PASS	2	1
8	KODIAK	13	4
9B	KOKHANOK	2	1
10	UNALASKA	2	1
10B	SHEMYA	1	0
14A	BIG LAKE	1	1
14A	HOUSTON	3	1
14A	MEADOW LAKES	1	1
14A	PALMER	15	1
14A	WASILLA	40	13
14A	WILLOW	4	0
14B	TALKEETNA	2	1
14C	ANCHORAGE	38	8
14C	CHUGIAK	1	0
14C	EAGLE RIVER	5	2
14C	FORT RICHARDSON	4	3
15B	KASILOF	4	1
15B	KENAI	19	4
15B	SOLDOTNA	12	2

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**Appendix Table 1-8.** Unit 5A: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 2005 to 2018 cumulative (**bold**=rural Southeast community).  
Continued from previous page

Unit of residence	Community	Unit 5A Number of hunters 2005-2018	Unit 5A Number of brown bear harvested 2005-2018
15B	STERLING	3	2
15C	HOMER	4	1
18	BETHEL	3	0
18	QUINHAGAK	1	0
20A	CLEAR	1	1
20B	EIELSON AFB	1	1
20B	ESTER	1	0
20B	FAIRBANKS	11	2
20B	FORT WAINWRIGHT	1	1
20B	NORTH POLE	42	16
20B	SALCHA	2	1
20B	TWO RIVERS	7	1
20D	DELTA JUNCTION	16	0
20D	TOK	4	0
26A	UTQIAGVIK	2	0
	RESIDENT, NON-AK CITY	2	1
	NONRESIDENTS	289	153
	GRAND TOTAL	2,220	573
<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>		<b>35%</b>	<b>35%</b>

**Appendix Table 1-9.** Unit 5B: Number of hunters and number of brown bears harvested based on the ADF&G harvest reporting system, from 2005 to 2018 cumulative (**bold**=rural Southeast community) (Source: OSM 2019; Scott 2019 pers. comm.).

Unit of residence	Community	Unit 5B Number of hunters 2005-2018	Unit 5B Number of brown bear harvested 2005-2018
<b>1A</b>	<b>KETCHIKAN</b>	<b>1</b>	<b>0</b>
<b>1C</b>	<b>JUNEAU</b>	<b>2</b>	<b>0</b>
<b>4</b>	<b>HOONAH</b>	<b>1</b>	<b>0</b>
<b>4</b>	<b>SITKA</b>	<b>3</b>	<b>3</b>
<b>5A</b>	<b>YAKUTAT</b>	<b>10</b>	<b>4</b>
10	DUTCH HARBOR	1	1
14A	PALMER	1	0
14A	WASILLA	1	0
14C	ANCHORAGE	2	0
14C	EAGLE RIVER	4	2
14C	FORT RICHARDSON	1	0
14C	PETERS CREEK	1	0
	RESIDENT, NON-AK CITY	1	0
	NONRESIDENT	75	38
	GRAND TOTAL	104	48
<b>RURAL SOUTHEAST COMMUNITIES ONLY</b>		<b>16%</b>	<b>15%</b>

<b>WP20–12 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-12 requests that the deer season in Unit 3, Mitkof, Woewodski, and Butterworth Islands be extended from Oct. 15 – Oct. 31 to Oct. 1 – Nov. 7, and that the hunt area be revised to include that portion of Kupreanof Island on the Lindenberg Peninsula east of Portage Bay - Duncan Canal Portage. The proposal also request that harvest limit be revised from antlered deer to buck in all of Unit 3. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<p><b>Unit 3— Deer</b></p> <p><i>Unit 3— Mitkof, Woewodski, and Butterworth Islands and that portion of Kupreanof Island on the Lindenberg Peninsula east of the Portage Bay-Duncan Canal Portage — 1 antlered-deer buck</i>      <del>Oct. 15—Oct. 31</del> <b>Oct. 1 – Nov. 7</b></p> <p><i>Unit 3— Kupreanof Island, that portion east of the Portage Bay—Duncan Canal Portage — 1 antlered deer</i>      <del>Oct. 15—Oct. 31</del></p> <p><i>Unit 3— remainder — 2 antlered deer bucks</i>      <del>Aug. 1 – Nov. 30</del> <i>Dec. 1 – Dec. 31</i> <i>season to be announced</i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>None</b>

**DRAFT STAFF ANALYSIS  
WP20-12**

**ISSUES**

Wildlife Proposal WP20-12, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that the deer season in Unit 3, Mitkof, Woewodski, and Butterworth Islands be extended from Oct. 15 – Oct. 31 to Oct. 1 – Nov. 7, and that the hunt area be revised to include that portion of Kupreanof Island on the Lindenberg Peninsula east of Portage Bay - Duncan Canal Portage. The proposal also requests that the harvest limit be revised from antlered deer to buck in all of Unit 3.

**DISCUSSION**

The proponent states that deer populations in the proposed hunt area could withstand additional harvest opportunity based on the actions of the Alaska Board of Game (BOG) in State Proposal 45 and local observations of the deer population. The proponent states that extending the season later in the fall would correspond to cooler temperatures, allowing harvesters a greater amount of time to travel and process deer before meat spoils. The proponent also states that the season should not be extended beyond the proposed dates due to increased stressors such as weather and wolf predation during this time. The proponent also requests that the harvest limit be changed from antlered deer to buck, aligning regulations with the State. Currently, the Federal regulations are more restrictive than the State, requiring that a legal buck have antlers. Aligning Federal and State harvest limit regulations would allow for greater opportunity for subsistence users.

**Existing Federal Regulation**

**Unit 3— Deer**

*Unit 3— Mitkof, Woewodski, and Butterworth Islands — 1 antlered deer      Oct. 15 – Oct. 31*

*Unit 3— Kupreanof Island, that portion east of the Portage Bay – Duncan Canal Portage — 1 antlered deer      Oct. 15 – Oct. 31*

*Unit 3— remainder — 2 antlered deer      Aug. 1 – Nov. 30  
Dec. 1 – Dec. 31,  
season to be  
announced*

**Proposed Federal Regulation**

**Unit 3— Deer**

*Unit 3— Mitkof, Woewodski, ~~and~~ Butterworth Islands and that portion of Kupreanof Island on the Lindenberg Peninsula east of the Portage Bay-Duncan Canal Portage — 1 antlered deer buck* ~~Oct. 15—Oct. 31~~  
**Oct. 1 – Nov. 7**

~~Unit 3— Kupreanof Island, that portion east of the Portage Bay—  
Duncan Canal Portage—1 antlered deer~~ ~~Oct. 15—Oct. 31~~

*Unit 3— remainder — 2 antlered deer bucks* ~~Oct. 15—Oct. 31~~  
Aug. 1 – Nov. 30

*Dec. 1 – Dec. 31  
season to be  
announced*

**Existing State Regulation**

**Unit 3—Deer**

*Unit 3— Petersburg Management Area — 2 bucks, by bow and arrow Only* Oct. 1 – Dec. 15

*Unit 3— remainder of Mitkof, Woewodski, Butterworth Islands — 1 buck* Residents: Oct. 1 –  
Nov. 7

*Non-residents: Oct.  
15-Oct 31*

*Unit 3—That portion of Kupreanof Island on the Lindenberg Peninsula east of the Portage Bay-Duncan Canal Portage – 1 buck* Residents: Oct. 1-Nov.  
7

*Non-residents: no  
open season*

*Unit 3— remainder — 2 bucks* Aug. 1 – Nov. 30

*Same-day airborne hunting of deer allowed. Harvest ticket must be validated in sequential order, and unused tickets must be carried when you hunt. In all hunts limited to one sex, evidence of sex must remain naturally attached to the meat or antlers must remain naturally attached to the entire carcass, with or without viscera.*

## **Extent of Federal Public Lands/Waters**

Unit 3 is comprised of 90% Federal public lands and consist of 90% U.S. Forest Service (USFS) managed lands (see **Unit Map**).

## **Customary and Traditional Use Determinations**

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

## **Regulatory History**

Complete State and Federal regulatory history since 1925 can be found in **Appendix 1**. Unit 3 deer regulations became more restrictive following severe winters in the late 1960s and early 1970s. In 1969, Mitkof Island was first separated from the remainder of Unit 3 to reduce harvest on the island. Harvest restrictions increased until 1975 when Unit 3 was closed to deer harvest. In 1980, a season opening allowed for the harvest of one buck in the southern portion of Unit 3 from Aug. 1 – Dec. 31. The Lindenberg Peninsula remained closed until 1993 when a season was established to allow the harvest of one buck by registration permit from Oct. 15 – Oct. 31. In 2003, Mitkof, Woewodski, and Butterworth Islands were open to the harvest of one buck from Oct. 15 – Oct. 31 while the remainder of Unit 3, now including the Lindenberg Peninsula, had a harvest limit of two antlered deer from Aug. 1 – Nov. 30. Beginning in 2013, the Lindenberg Peninsula was separated from the majority of Unit 3, reducing the season to Oct. 15 – Oct. 31 and limiting harvest to one buck. Since 2008, the Petersburg Ranger District of the USFS has been authorized to extend the season in the remainder of Unit 3 up to December 31 in consultation with the Alaska Department of Fish and Game (ADF&G) and the Council Chair. However, the season has never been extended due to lower than average deer numbers.

## **Current Events Involving the Species**

In January 2019, the BOG adopted Proposal 45 to extend the resident deer season on Mitkof, Woewodski, and Butterworth Islands to Oct. 1 – Nov. 7. Although the Petersburg Management Area season was extended for both residents and non-residents, seasons on Mitkof, Woewodski, and Butterwoth Islands were only extended for residents. The BOG also adopted Proposal 46 to extend the resident deer season for the portion of Kupreanof Island on the Lindenberg Peninsula east of the Portage Bay-Duncan Canal Portage, referred to as Lindenberg Peninsula by the BOG. The Lindenberg Peninsula was included in the regulation to simplify hunting regulations for users. ADF&G suggested that the Unit 3 deer population had recovered sufficiently to support a more liberal season length. The BOG decided to extend the end of the season to November 7 in an effort to provide additional harvest opportunity. The non-resident deer hunting season on the Lindenberg Peninsula remains closed.

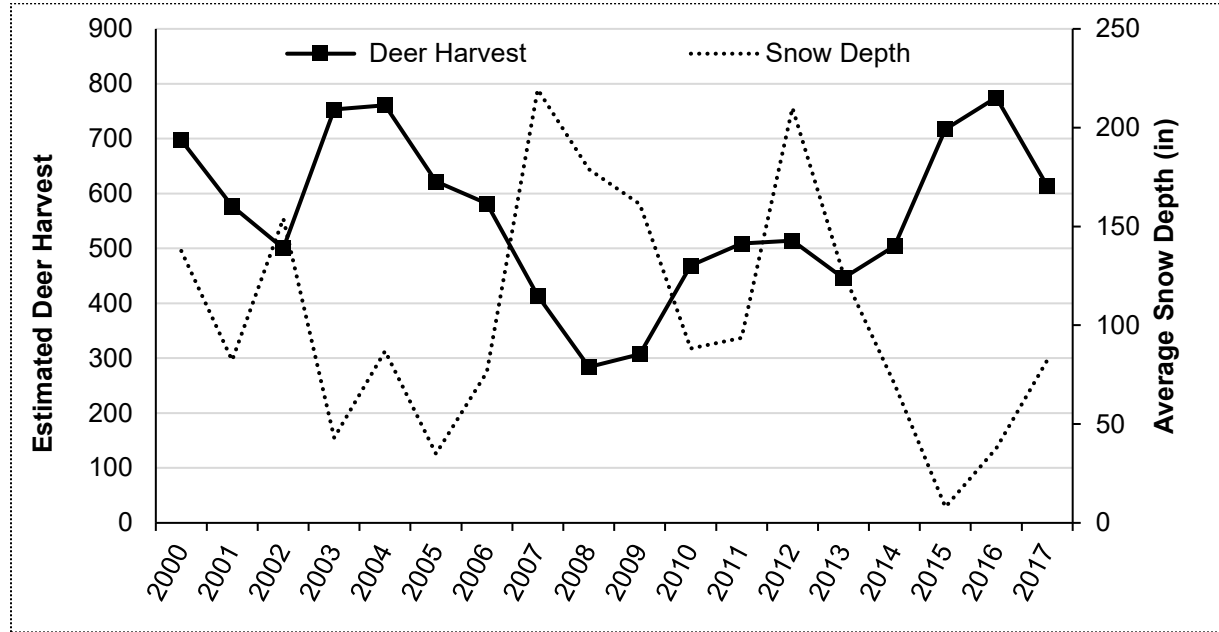
## **Biological Background**

Sitka black-tailed deer are native to the wet coastal rainforests of southeast Alaska. Deer populations in Alaska are dynamic and fluctuate considerably with the severity of the winters, predation, and altered habitat. When winters are mild, deer numbers generally increase. Periodically, however, a severe winter



will cause a major decline in the population. Deer have high reproductive potential, and reduced populations normally recover rapidly. In some cases, predation may accelerate a decline in deer numbers, or slow recovery (ADF&G 2017a).

Unit 3 experienced above average winter snowfall from 2006-2009, and those harsh winter conditions are believed to have caused a decline in the deer population. Deer harvest in Unit 3 has been steadily increasing, following the harsh winters of 2006-2009 (**Figure 1**) possibly reflecting an increased population.

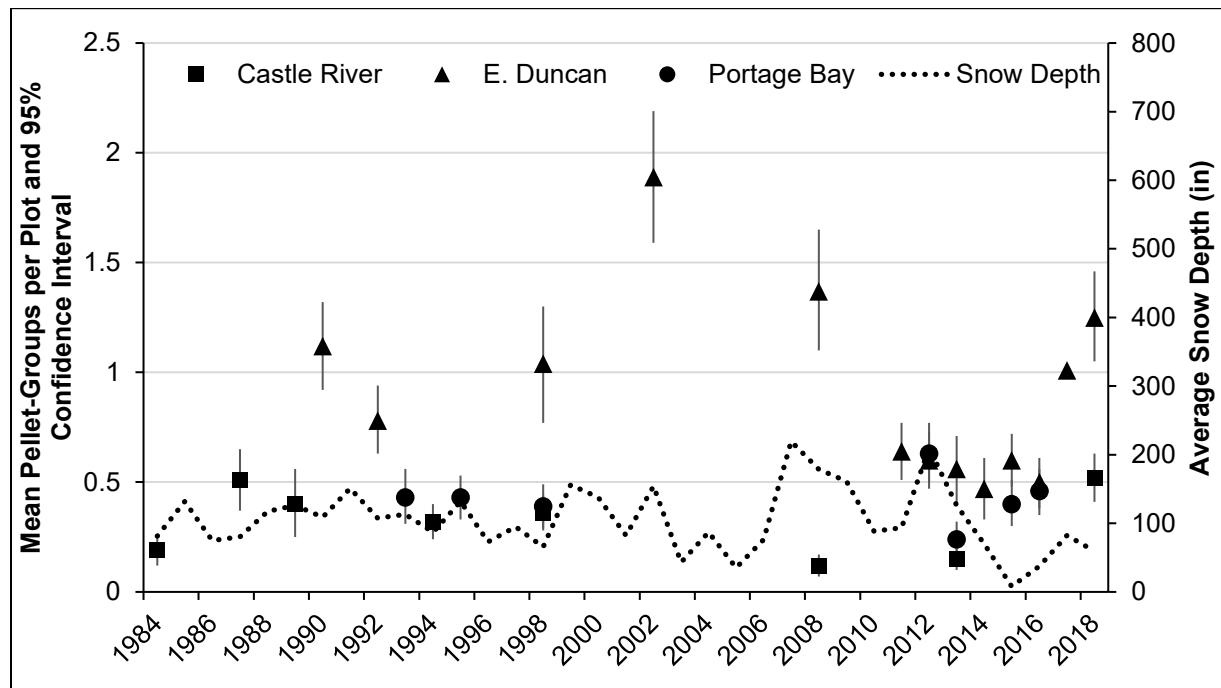


**Figure 1.** Estimated deer harvest in Unit 3 from 2000-2017. Harvest numbers from 2000-2010 are estimates based on ADF&G mail surveys. Harvest from 2011-2017 are based on ADF&G mandatory harvest reporting. Average snow depth in inches, Petersburg Ridge, Petersburg, Alaska, 1,650 foot elevation, January-March 2000-2017 (NRCS 2016).

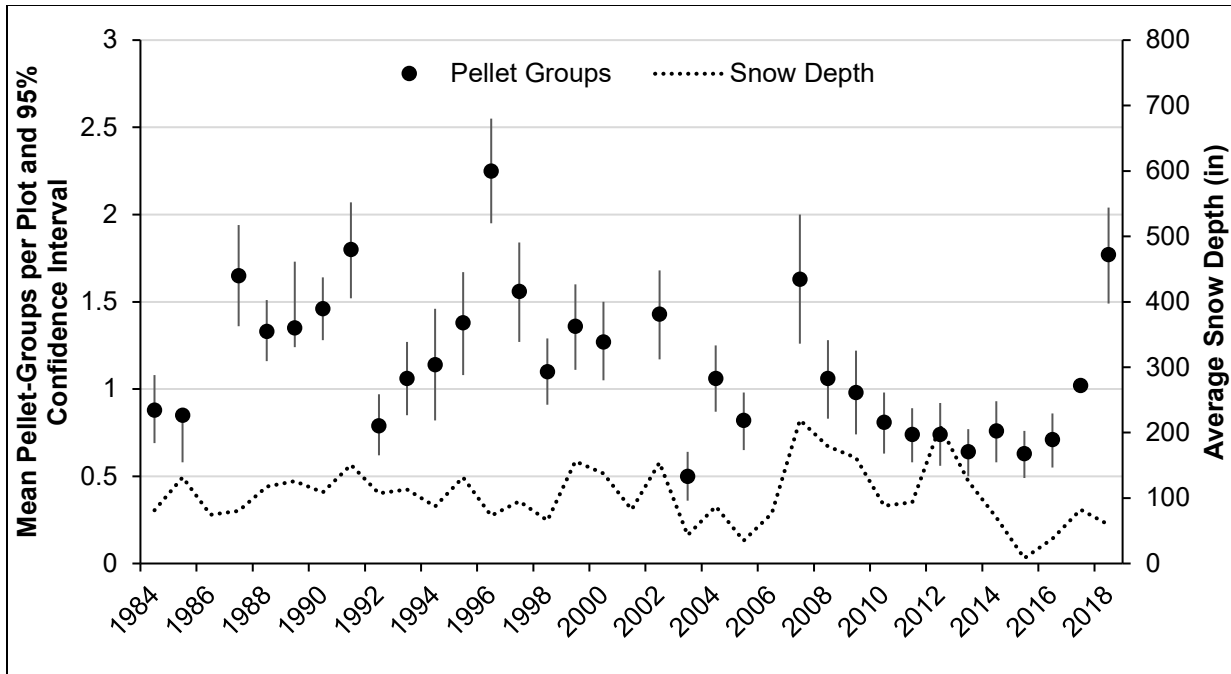
There are no methods to directly count deer in southeast Alaska, so ADF&G deer pellet surveys are the primary source of available population information (**Figure 2**; **Figure 3**). However, relating pellet group data to population levels is difficult because factors other than changes in deer population size can affect deer pellet-group density. Snowfall patterns influence the annual distribution and density of deer pellets, and snow persisting late into the spring at elevations below 1,500 feet limits the ability to consistently survey the same elevation zones among years. In mild winters, deer can access forage in a greater variety of habitats, not all of which are surveyed. Conversely, in severe winters, deep snow concentrates deer in certain areas (McCoy 2017). Brinkman et al. (2013) questioned the value of pellet-group surveys for monitoring population trends due to the variability in the data compared to DNA based counts. Due to variability in deer pellet-group surveys, they are only used to identify large changes in deer density (> 30%)( McCoy 2017). Relating pellet groups between sites is also difficult so they are only used for general comparison.

The State management goal for GMU 3 is to achieve and maintain a population of 15,000 deer while maintaining an annual harvest of 900 deer (Harper and McCarthy, eds., 2015). This goal has not been reached since the year 2000 and as a result the department prepared an operational plan for the intensive management of Sitka black-tailed deer in a portion of GMU 3 (ADF&G 2013). ADF&G’s management objectives for GMU 3 are to maintain winter range (<1,500 foot elevation) that is capable of supporting 32 deer/mi<sup>2</sup> (average 1.0 pellet group/20 m<sup>2</sup> plot), monitor long-term trends in deer abundance using pellet-group surveys, and monitor deer harvest using mandatory harvest ticket reports.

**Figure 2** shows pellet-group survey results for units within Unit 3. Woewodski survey area has the highest frequency of pellet group surveys in Unit 3 and is shown on its own in **Figure 3**. These data suggest a declining population following the deep snow winters starting in 2006–07. Based on the pellet-group data for Unit 3, the deer population appears to have rebounded slightly in recent years; However, ADF&G considers the deer population in Unit 3 to be well below carrying capacity (Lowell 2011, Division of Wildlife Conservation 2012).



**Figure 2.** Historical Unit 3 mean pellet-group counts and 95% confidence interval from East Duncan, Castle River, and Portage Bay from 1984-2018. Pellet data provided by ADF&G (McCoy 2017; McCoy 2019, Unpublished). Average snow depth in inches, Petersburg Ridge, Petersburg, Alaska, 1,650 foot elevation, January-March 1984-2018 (NRCS 2016).



**Figure 3.** Historical mean pellet group counts and 95% confidence interval from the Woewodski survey area (Mitkof Island) from 1984-2018. Pellet data provided by ADF&G (McCoy 2017; McCoy 2019, Unpublished). Average snow depth in inches, Petersburg Ridge, Petersburg, Alaska, 1,650 foot elevation, January-March 1984-2018 (NRCS 2016).

### Habitat

Sitka black-tailed deer use a variety of habitat types throughout the year. Deer spend the winter and early spring at low elevation where there is less snow accumulation, and forests provide foraging opportunity. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet the caloric needs of lactating does. Some deer are migratory and follow the greening vegetation up to the alpine for the summer, while others remain at lower elevations. In late fall and early winter, the migratory deer return to lower elevations as snow covers available forage. In winters with increased snowfall, deer in southeast Alaska decrease their use of open habitats (e.g., muskegs and young clearcuts) and increase their use of old growth forests, which intercept snow most effectively (Kirchhoff and Schoen 1987). Optimum habitat during a deep snow winter is low elevation, old-growth forest on south-facing slopes. Commercial timber harvest within high volume old-growth stands diminishes the value and amount of winter deer habitat.

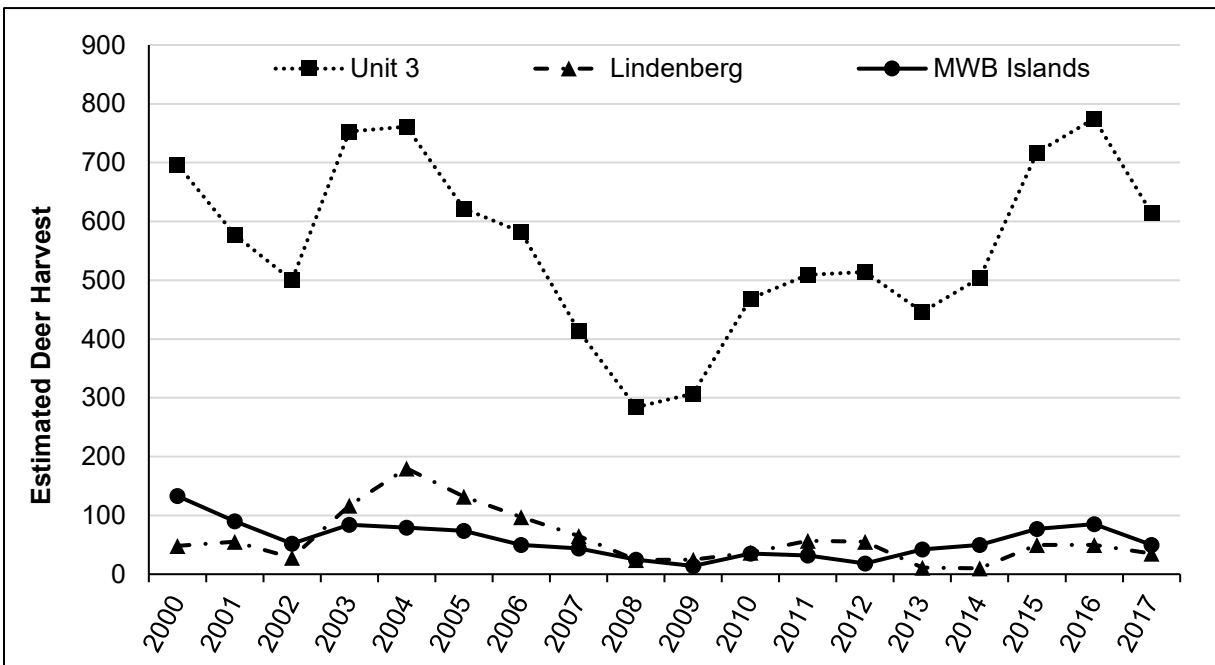
The quantity, quality, distribution, and arrangement of winter habitat for deer is considered the most important limiting factor for deer in southeast Alaska. The overall effect of snow restricts the range of suitable habitats and lowers the quality of all habitats (Hanley 1984). The ability of winter habitat to support deer is a function of forage availability and quality (Hanley et al. 1989); the ability of the habitat to intercept snow (Hanley and Rose 1987, Kirchhoff and Schoen 1987); and the climate of the habitat as influenced by the elevation, slope, and aspect of the area (Hanley and Rose 1987). In southeast Alaska, low-elevation, high-volume old-growth habitats are particularly important to deer, especially during severe winters (Yeo and Peek 1992). These old-growth stands intercept snow, provide thermal cover, and

support the largest biomass of herb and shrub forage for deer (Alaback 1982). As snow depth increases, selection of high-volume old-growth forests on south facing slopes increases (Gilbert et al. 2017).

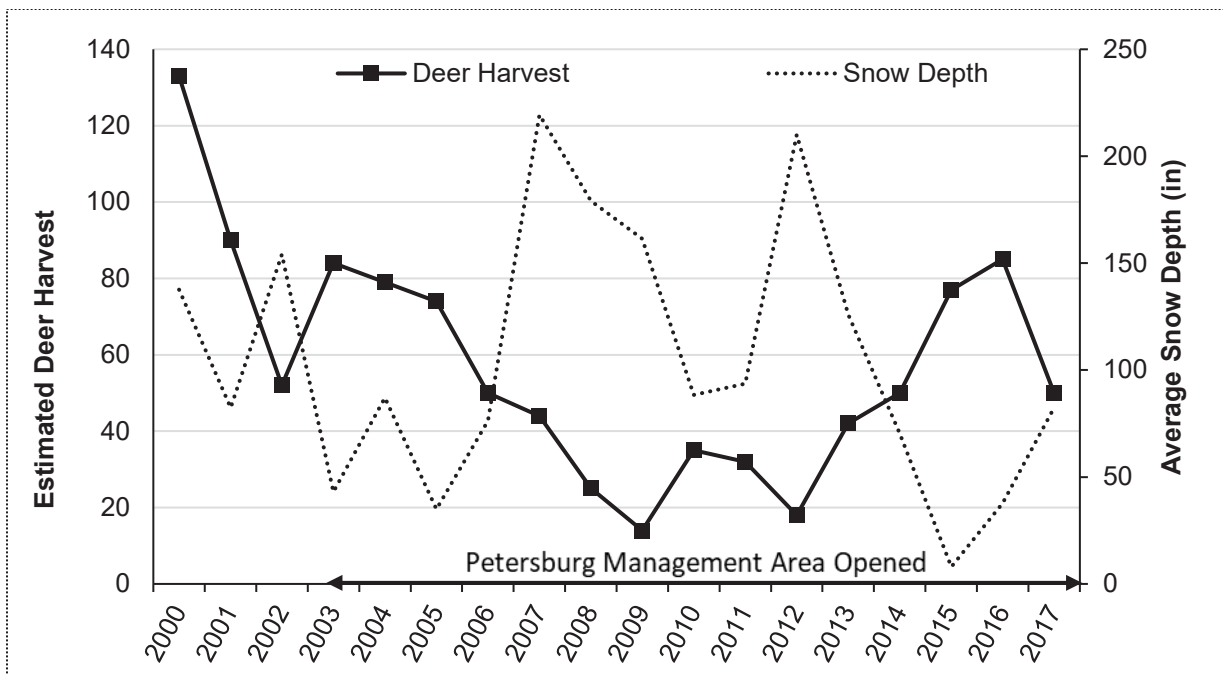
### Harvest History

Harvest data reported below were provided by ADF&G and were gathered by the Unit 3 deer survey and the State-wide deer management report. From 1980 to 2010 (with the exception of 1981), ADF&G estimated Unit 3 harvest data using a regional questionnaire that was mailed to a random sample of 33% of deer harvest ticket holders (Harper and McCarthy, eds., 2015). Survey results for hunter effort, success, and harvest location were then expanded to estimate results for all harvest ticket holders. Beginning in the fall of 2011, the mailed questionnaire was replaced by mandatory hunt report cards issued in conjunction with deer harvest tickets.

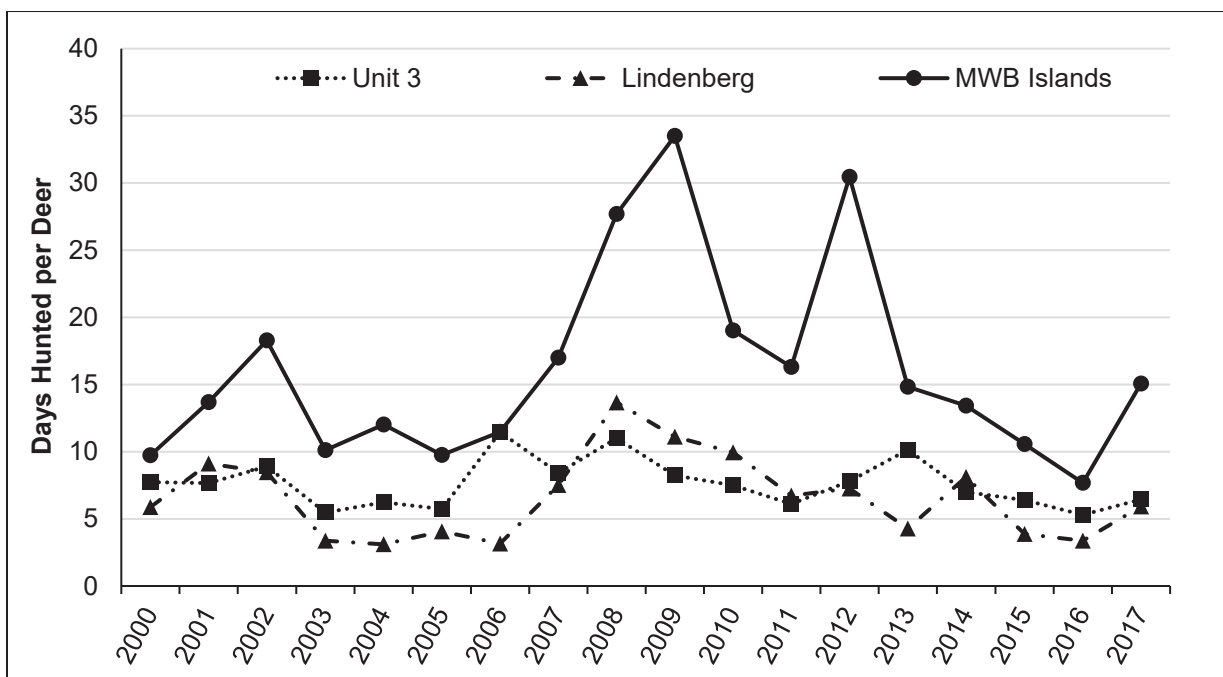
The number of deer harvested in Unit 3 has fluctuated since 2000 (**Figure 4**). Total deer harvest steadily declined from 2004 to 2008 (ADF&G 2017b). Deer harvest increased after 2009 in Unit 3, including the Mitkof, Woewodski, and Butterworth Islands, indicating the population may have rebounded at least in some areas. Another factor in the area is that for three winters in a row, (2006–2007, 2007–2008, and 2008–2009) snow cover was well above average (**Figure 5**); Petersburg received record-breaking snowfall in 2006–2007 (NRCS 2016). It is unknown how much deer mortality occurred during these hard winters, but low harvest and increased hunter effort per deer reflect a possible decrease in the deer population following those winters (**Figure 5**; **Figure 6**). Since the low number of deer harvested in 2008, there has been a general increase in deer harvest.



**Figure 4.** Estimated deer harvest in Unit 3, Lindenberg Peninsula, and Mitkof, Woewodski, and Butterworth Islands (MWB Islands) from 2000-2017. Harvest numbers from 2000-2010 are estimates based on ADF&G mail surveys. Harvest from 2011-2017 are based on ADF&G mandatory harvest reporting. Data provided by ADF&G deer harvest surveys.

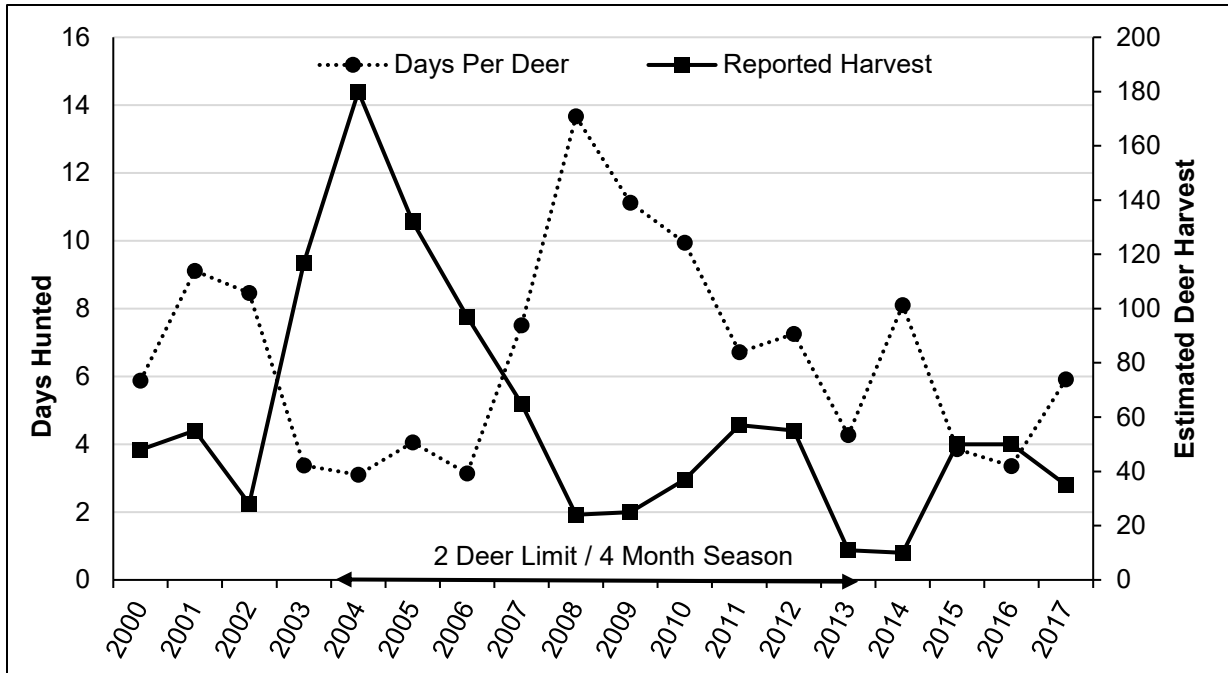


**Figure 5.** Estimated deer harvest on Mitkof, Woewodski, and Butterworth Islands (MWB Islands) 2000-2017. Harvest numbers from 2000-2010 are estimates based on ADF&G mail surveys. Harvest from 2011-2017 are based on ADF&G mandatory harvest reporting. Average snow depth in inches, Petersburg Ridge, Petersburg, Alaska, 1,650 foot elevation, January-March 2000-2017 (NRCS 2016).

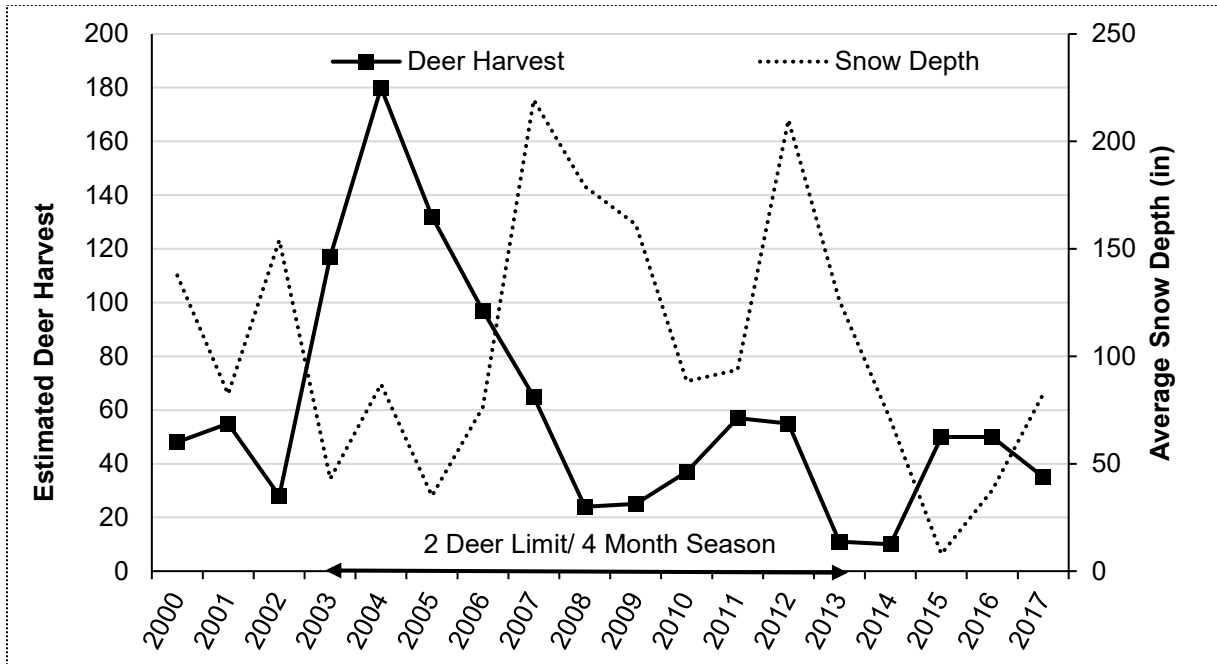


**Figure 6.** The number of days hunted per deer harvested in Unit 3, Lindenberg Peninsula, and Mitkof, Woewodski, and Butterworth Islands (MWB Islands) from 2000-2017. Data provided by ADF&G deer harvest surveys.

The Lindenberg Peninsula has had variable deer harvest, which can partially be explained by changes in harvest regulations. From 1993 to 2003, the Lindenberg Peninsula had a harvest limit of one antlered deer from Oct. 15 – Oct. 31. In 2003, the peninsula had a harvest limit of two antlered deer from Aug. 1 – Nov. 30, which may explain the spike in deer harvest following that year (Figure 7, 8). Beginning in 2013, the Lindenberg Peninsula was separated from the majority of Unit 3, reducing the season once again to Oct. 15 – Oct. 31 and limiting harvest to one buck. The peninsula was subject to the same harsh winters from 2006-2009, which may have led to a decline in deer harvest (Figure 8). Deer harvest has rebounded slightly in recent years.



**Figure 7.** Total days hunted per deer harvested and estimated deer harvest on the Lindenberg Peninsula from 2000-2017. Harvest numbers from 2000-2010 are estimates based on ADF&G mail surveys. Harvest from 2011-2017 are based on ADF&G mandatory harvest reporting.



**Figure 8.** Estimated deer harvest and snow depth on the Lindenberg Peninsula from 2000-2017. Harvest numbers from 2000-2010 are estimates based on ADF&G mail surveys. Harvest from 2011-2017 are based on ADF&G mandatory harvest reporting. Average snow depth in inches, Petersburg Ridge, Petersburg, Alaska, 1,650 foot elevation, January-March 2000-2017 (NRCS 2016).

Federal designated hunting regulations allow a Federally qualified subsistence user to hunt for another Federally qualified subsistence user (recipient) who also qualifies for that particular hunt. There are no age or disability provisions required of the recipient. The designated hunter is required to have a current Federal designated hunting permit in their possession, along with the recipient’s harvest ticket(s) or permit for that particular species. The designated hunter can hunt for any number of recipients, but may not possess more than two harvest limits at a time. Federal designated hunter harvest contributed between 6-19% of the total deer harvest in Unit 3 from 2003 to 2017 (**Table 1**). The number of designated hunter permits issued in the unit varies, but has remained between 15 and 38 permits per year since 2003.

**Table 1.** Summary of estimated deer harvest and total reported Federal designated hunter harvest in Unit 3, 2003-2017 (USFWS 2019, ADF&G 2017b).

Year	Total estimated deer harvest	Total hunters	Deer harvested per hunter	Federal designated harvest	Percent Federal designated hunter harvest	Permits used
2003	833	917	0.9	69	8%	32
2004	890	1,015	0.9	75	8%	33
2005	730	913	0.8	60	8%	29
2006	644	1,067	0.6	47	7%	26
2007	516	750	0.7	31	6%	15
2008	371	617	0.6	36	10%	15
2009	585	617	0.9	36	6%	15
2010	665	720	0.9	95	14%	41
2011	525	704	0.7	101	19%	38
2012	536	822	0.7	68	13%	35
2013	473	807	0.6	45	10%	27
2014	514	781	0.7	76	15%	28
2015	723	889	0.8	101	14%	55
2016	787	1,017	0.8	144	18%	56
2017	625	916	0.7	97	16%	63

**Effects of the Proposal**

If this proposal is adopted, it would lengthen the deer season from 16 days to 38 days, which would provide greater opportunity for Federally qualified subsistence users. The longer season would allow Federally qualified subsistence users other opportunities to hunt in the event of factors such as inclement weather conditions. The extended season would correspond with cooler weather allowing harvesters to continue harvesting longer before meat spoils, as stated by the proponent.

Although buck-only harvest may alter buck/doe ratios and age structure of the male segment of population, it does not reduce the reproductive potential of the population because the same number of does are still bred by remaining bucks. Hunters sometimes blame declines in the number of fawns per doe on a scarcity of bucks or a lack of mature bucks available for breeding. However, research has failed to support a biologically meaningful relationship; the number of bucks per 100 does is unrelated to fawn recruitment the following year (Zwank 1976, Erickson et al. 2003).

The proposal would align Federal and State deer hunting regulations for this portion of Unit 3, reducing confusion among user groups and making enforcement easier. Changing the definition of a legal deer from “antlered” to “buck” could slightly increase harvest of yearling male deer (button bucks) in the proposed areas and mature male deer in the remainder of the unit that may have shed their antlers, as



these animals do not meet the definition of antlered. Changes allowing harvest of antlerless bucks may lead to an increase in illegal harvest of does mistaken as antlerless bucks.

No large increase in harvest is expected as the harvest limit will remain the same and harvesters already have the ability to hunt during this timeframe under State regulations. However, harvest may increase slightly due to the increased amount of time that designated hunters will have to harvest for other Federally qualified subsistence users. In the past 15 years, Federal designated hunter harvest has only accounted for 6-19% of the total deer harvest in Unit 3. Increased Federal designated hunter harvest in the proposed area will not likely have a large effect on the total deer harvest.

## **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP20-12.

### **Justification**

The current Federal harvest regulations for Mitkof, Woewodski, and Butterworth Islands were set in 1993 after an 18 year closure due to declines in deer populations. The population declines were attributed to a series of harsh winters (late 1960's and early 1970's) and liberal harvest regulations. Federal subsistence deer hunting regulations within the Lindenberg Peninsula were most recently restricted in 2013 in response to a decline in deer population (harvest) likely attributed to a series of harsh winters. However, the deer population in Unit 3 appears to be recovering in recent years and currently presents no conservation concerns.

The 22 day addition to the season would increase opportunity for Federally qualified subsistence users. Factors such as weather conditions can often limit access to the many remote islands in Unit 3. Extending the season would allow Federally qualified subsistence users more time to harvest a deer in these areas. Given that harvest is limited to one buck, it is unlikely that the overall harvest will increase dramatically as deer populations in the unit are more affected by habitat and winter weather conditions than by harvest.

Aligning Federal regulations and gender terminology (antlered deer vs buck) in Unit 3 with those of the State will reduce confusion and simplify enforcement. Currently, Federal deer regulations in Unit 3 are more restrictive to Federal subsistence users than State regulations.

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### Appendix 1

Regulatory history for Unit 3 deer since 1925.

<b>Year</b>	<b>Season Type</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions and Limitations</b>
1925	Open	Sep. 16– Dec. 15	3	Bucks, 3 inch antlers or longer
1926– 1929	Open	Sep. 1– Nov. 30	3	Bucks, 3 inch antlers or longer
1930– 1941	Open	Aug. 20– Nov. 15	3	Bucks, 3 inch antlers or longer
1942– 1943	Resident	Sep. 16– Nov. 15	2	Bucks, 3 inch antlers or longer
1942– 1943	Nonresident	Sep. 16– Nov. 15	1	Bucks, 3 inch antlers or longer
1944– 1948	Resident	Sep. 1– Nov. 15	2	Bucks, 3 inch antlers or longer
1944– 1948	Nonresident	Sep. 1– Nov. 15	1	Bucks, 3 inch antlers or longer
1949	Resident	Sep. 1– Nov. 7	2	Bucks, 3 inch antlers or longer
1949	Nonresident	Sep. 1– Nov. 7	1	Bucks, 3 inch antlers or longer
1950– 1951	Resident	Sep. 1– Nov. 15	2	Bucks, 3 inch antlers or longer
1950– 1951	Nonresident	Sep. 1– Nov. 15	1	Bucks, 3 inch antlers or longer
1952	Open	Aug. 20– Nov. 15	2	Bucks, 3 inch antlers or longer
1953– 1954	Open	Aug. 20– Nov. 22	2	Bucks, 3 inch antlers or longer
1955	Open	Aug. 20– Nov. 22	3	3 bucks or 2 bucks and 1 antlerless deer, bucks 3 inch antlers or longer, antlerless deer may be taken Nov. 15–Nov. 22
1956	Open	Aug. 20– Nov. 26	3	3 bucks or 2 bucks and 1 antlerless deer, bucks 3 inch antlers or longer, antlerless deer may be taken Nov. 15–Nov. 26
1957– 1959	Open	Aug. 20– Nov. 30	4	4 deer, does may be taken Oct. 15–Nov. 30
1960	Open	Aug. 20– Dec. 15	4	4 deer, does may be taken Oct. 1–Dec. 15
1961	Open	Aug. 1– Nov. 30	4	4 deer, antlerless deer may be taken Sep. 15–Nov. 30
1962	Open	Aug. 1– Dec. 15	4	4 deer, antlerless deer may be taken Sep. 15–Dec. 15
1963– 1966	Open	Aug. 1– Dec. 31	4	4 deer, antlerless deer may be taken Sep. 15–Dec. 31
1967	Open	Aug. 1– Dec. 31	4	4 deer, antlerless deer may be taken Oct. 1–Dec. 31
1968	Open	Aug. 1– Dec. 15	4	4 deer, antlerless deer may be taken Sep. 15–Dec. 15
1969– 1970	Open	Aug. 1– Dec. 31	4	4 deer, antlerless deer may be taken Oct. 1–Dec. 31
1969– 1970	Open	Aug. 1– Nov. 30	2	Mitkof Island; 2 antlered deer

<b>Year</b>	<b>Season Type</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions and Limitations</b>
1969–1970	Open	Aug. 1–Dec. 15	4	Remainder of Unit 3; antlerless deer may be taken Nov. 1–Nov. 31
1971	Open	Aug. 1–Nov. 30	2	Mitkof, Wrangell, Etolin & Woronkofski Islands; 2 antlered deer
1971	Open	Aug. 1–Nov. 30	3	Remainder of Unit 3; antlerless deer may be taken Oct. 1–Oct. 31
1972	Open	Aug. 1–Nov. 30	2	2 antlered deer
1973–1974	Open	Sep. 1–Nov. 30	1	1 antlered deer
1975–1979	No open season			
1980	Open	Aug. 1–Dec. 31	1	South of Sumner Strait and Eastern Passage, including Level, Vank, Sokolof, Rynda, and Kadin islands; 1 buck
1980	Open	No open season		Remainder of Unit 3
1981–1984	Open	Aug. 1–Nov. 30	1	South of Sumner Strait and Eastern Passage, including Level, Vank, Sokolof, Rynda, and Kadin islands; 1 antlered deer
1981–1984	Open	No open season		Remainder of Unit 3
1985–1987	State Subsistence/General	Aug. 1–Nov. 30	1	South of Sumner Strait and Eastern Passage, including Level, Vank, Sokolof, Rynda, Conclusion, and Kadin islands; 1 antlered deer
1985–1987	State Subsistence/General	No open season		Remainder of Unit 3
1988–1990	State Subsistence/General	Aug. 1–Nov. 30	2	South of Sumner Strait and Decision Point, including Level, Vank Island group but not Level, Conclusion, or Channel islands; 2 antlered deer
1988–1990	State Subsistence/General	No open season		Remainder of Unit 3
1991–1992	State Subsistence/General, Federal Subsistence	Aug. 1–Nov. 30	2	South of Sumner Strait and Decision Point, including Level, Vank Is. group but not Level, Conclusion, or Channel islands; 2 antlered deer.
1991–1992	State Subsistence/General, Federal Subsistence	Oct. 15–Oct. 31	1	Mitkof Island south of the Petersburg city limits, Woedwodski and Butterworth islands; 1 antlered deer by registration permit
1991–1992	State Subsistence/General, Federal Subsistence	No open season		Remainder of Unit 3
1993–1994	State Subsistence/General, Federal Subsistence	Oct. 15–Oct. 31	1	Mitkof Island south of the Petersburg city limits, Kupreanof Island on Lindenberg Peninsula east of Portage Bay/Duncan Canal Portage, Woedwodski and Butterworth islands; 1 antlered deer by registration permit
1993–1994	State Subsistence/General, Federal Subsistence	No open season		Mitkof Island within Petersburg city limits, Kupreanof Island within Kupreanof city limits
1993–1994	State Subsistence/General, Federal Subsistence	Aug. 1–Nov. 30	2	Remainder of Unit 3, 2 antlered deer

Year	Season Type	Season	Limit	Conditions and Limitations
1995–2002	State Subsistence/General	Oct. 15–Oct. 31	1	Mitkof Island south of Petersburg city limits, Kupreanof Island on Lindenberg Peninsula east of Portage Bay-Duncan Canal portage outside the Kupreanof city limits, and Woewodski and Butterworth Islands; 1 buck by harvest permit only
1995–2002	State Subsistence/General	No open season		Mitkof Island within the Petersburg city limits and that portion of Kupreanof Island within Kupreanof city limits
1995–2013	State Subsistence/General	Aug. 1–Nov. 30	2	Remainder of Unit 3; 2 bucks by harvest permit only
1995–1997	Federal Subsistence	Oct. 15–Oct. 31	1	Mitkof, Woewodski, Butterworth Islands, and that portion of Kupreanof Island which includes the Lindenberg Peninsula east of the Portage Bay/Duncan Canal Portage; 1 antlered deer by State registration permit only; Petersburg and Kupreanof are closed to hunting
1995–1997	Federal Subsistence	Aug. 1–Nov. 30	2	Remainder of Unit 3; 2 antlered deer
1997–2003	Federal Subsistence	Oct. 15–Oct. 31	1	Mitkof, Woewodski, Butterworth Islands, and that portion of Kupreanof Island which includes the Lindenberg Peninsula east of the Portage Bay/Duncan Canal Portage; 1 antlered deer by State registration permit only; Petersburg and Kupreanof are closed to hunting
1997–2003	Federal Subsistence	Aug. 1–Nov. 30	2	Remainder of Unit 3; 2 antlered deer
2001–2002	State Subsistence/General	Oct. 15–Oct. 31	1	Mitkof Island, Kupreanof Island on the Lindenberg Peninsula east of Portage Bay-Duncan canal portage, and Woewodski and Butterworth Islands; 1 buck by harvest permit only
2003–2006	State Subsistence/General	Oct. 15–Nov. 15	1	Mitkof Island, the Petersburg Management Area; 1 buck by bow and arrow only with harvest permit
2003–2013	State Subsistence/General	Oct. 15–Oct. 31	1	Remainder of Mitkof Island, Woewodski, and Butterworth Islands; 1 buck by harvest permit only
2003–2013	Federal Subsistence	Oct. 15–Oct. 31	1	Mitkof, Woewodski, and Butterworth Islands; 1 antlered deer
2003–2008	Federal Subsistence	Aug. 1–Nov. 30	2	Remainder of Unit 3; 2 antlered deer
2007–2013	State Subsistence/General	Oct. 15–Dec. 15	2	Mitkof Island, the Petersburg Management Area; 2 bucks by bow and arrow only with harvest permit
2008–2013	Federal Subsistence	Aug. 1–Nov. 30	2	Remainder of Unit 3; 2 antlered deer; Dec. 1–Dec 31 season to be announced.
2013	State Subsistence/General, residents	Oct. 15–Oct. 31	1	That portion of Kupreanof Island on the <b>Lindenberg Peninsula</b> east of the Portage Bay-Duncan Canal Portage; 1 buck by harvest ticket
2013	State General, non-residents	No open season		That portion of Kupreanof Island on the <b>Lindenberg Peninsula</b> east of the Portage Bay-Duncan Canal Portage
2014	Federal Subsistence	Oct. 15–Oct 31	1	By Special Action - Kupreanof Island, that portion east of Portage Bay-Duncan Canal Portage – 1 antlered deer
2014	Federal Subsistence	Oct. 15–Oct 31	1	Kupreanof Island, that portion east of Portage Bay-Duncan Canal Portage – 1 antlered deer
2019	State General, resident	Oct. 15–Nov. 7	2	Mitkof Island, the Petersburg Management Area; 2 bucks by bow and arrow only with harvest permit

<b>Year</b>	<b>Season Type</b>	<b>Season</b>	<b>Limit</b>	<b>Conditions and Limitations</b>
2019	State General, residents	Oct. 1- Nov. 7	1	Mitkof, Woewodski, and Butterworth islands, and that portion of Kupreanof Island on the Lindenberg Peninsula east of the Portage Bay - Duncan Canal Portage – 1 buck

<b>WP20–13 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-13 requests a customary and traditional use determination for elk in Unit 3 for residents of Units 1–5. <i>Submitted by: Southeast Alaska Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<b>Customary and Traditional Use Determination—Elk</b>  <i>Unit 3</i> <del>All rural residents</del> <b>Residents of Units 1–5</b>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>2 Oppose</b>



**DRAFT STAFF ANALYSIS  
WP20-13**

**ISSUES**

Wildlife Proposal WP20-13, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests a customary and traditional uses of elk in Unit 3 be recognized for rural residents of Southeast Alaska, Units 1–5.

**DISCUSSION**

The proponent states that residents of the region have a long history of obtaining large wildlife resources, both historically and contemporarily, employing a multitude of transportation methods extensively for this purpose, and that rural Southeast resident depend upon large wildlife species for sustaining the mixed subsistence-cash economy of the region.

Considering elk specifically, the Council notes that the harvest, use, and sharing of elk by the region’s rural residents has been frequently documented, despite the species’ relatively recent introduction to the region in 1986. The Council indicates that elk now provides substantial cultural, economic, social, and nutritional benefit to the region. The Council additionally notes that the elk have been available for harvest for more than thirty years and that patterns of use and reliance have been established. They explain that large land mammals like elk provide a substantial amount of meat that helps to offset the expense of commercial goods, and that elk provide an efficiency of economy when they can be harvested near communities. The Council stated that elk are reasonably accessible to area residents and that elk commonly venture far from the island to which they were introduced. Furthermore, the Council noted that residents teach their kids about elk and pass on hunting knowledge in the same way that they do for other species.

**Existing Federal Regulation**

**Customary and Traditional Use Determination—Elk**

*Unit 3*

*All rural residents*

**Proposed Federal Regulation**

**Customary and Traditional Use Determination—Elk**

*Unit 3*

~~*All rural residents*~~ ***Residents of Units 1-5***

## Relevant Federal Regulation

### §100.5 Eligibility for subsistence use.

...

*(c) Where customary and traditional use determinations for a fish stock or wildlife population within a specific area have not yet been made by the Board (e.g., “no determination”), all Alaskans who are residents of rural areas or communities may harvest for subsistence from that stock or population under the regulations in this part.*

## Extent of Federal Public Lands

Unit 3 is comprised of 90% Federal public lands, all of which are managed by the U.S. Forest Service (see Unit Map).

## Regulatory History

The Alaska Legislature passed a law in 1985 requiring the introduction of 50 elk to Etolin Island. Introductions began in 1987. By 1996, the Alaska Department of Fish and Game (ADF&G) estimated that the elk population had reached at least 250 animals and could sustain a hunt of 20 bulls (Lowell 2004). The Alaska Board of Game (BOG) established the first hunt for elk by drawing permit in 1997, and authorized up to 30 permits for hunters to harvest 1 bull between October 1 and October 31 (Lowell 2002). That same year, the State Legislature passed House Bill 59, which required ADF&G to make available an additional four Unit 3 elk permits per year to be donated for competitive auctions or raffles to benefit nonprofit corporations that promote fish and game management of hunted species based in Alaska (Lowell 2002). The BOG added a September 15 through September 30 archery hunt in 1999, and expanded that hunt to September 1 through 30 in 2001 (Lowell 2002).

In 2006, WP06-11a was submitted to establish a customary and traditional use determination for elk in Units 1, 2, and 3 for the residents of Units 1B, 2, 3, and Meyer’s Chuck. The proponents concurrently submitted WP06-11b to establish a Federal season for the harvest of elk in Units 1, 2, and 3. The Federal Subsistence Board (Board) voted to “take no action” on both proposals which appeared on the consensus agenda at its May 2006 Board meeting. The Council recommended that the Board take no action, citing the short duration since introduction of elk in Unit 3, a lack of data concerning elk’s role in local subsistence patterns, and limited public input.

During its January 2019 meeting, the BOG eliminated the general season elk hunt outside of the drawing permit hunt areas in Unit 3. That left one archery draw hunt (DE318), two rifle draw hunts (DE321, DE323), and a rifle registration hunt (RE325) in State regulations.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process and present recommendations for regulatory changes (Salazar 2010). During this review in 2016, the Southeast Alaska Council described its view.

For example, the Southeast Alaska Council requested, among other things, that the Board adopt customary and traditional use determinations broadly (Bangs 2016:2). The Board responded that the Southeast Alaska Council's recommendation regarding customary and traditional use determinations aligned well with the current process followed statewide in the Federal Subsistence Management Program (Towarak 2016: 5). The Council intends to submit regulatory proposals to the Board requesting to broaden the complex web of customary and traditional use determinations that currently exist in Southeast Alaska (Bangs 2016: 2). The Council has requested, and the Board has adopted, customary and traditional use determinations for all fish (Proposal FP19-17) and for deer (Proposal WP18-02) that include all rural residents of Southeast Alaska. This has greatly simplified these determinations that were originally adopted from State regulations at the formation of the Federal Subsistence Management Program in 1992.

### **Biological Background**

Elk are not endemic to Alaska, but were first successfully introduced onto Afognak Island near Kodiak in 1929. There were several unsuccessful attempts to introduce elk in Southeast Alaska between 1925 and 1962 on Gravina, Kruzof, and Revillagigedo islands, but these attempts failed (O'Gara and Dundas 2002). After the Alaska State Legislature passed a bill in 1985 requiring introduction of elk, 33 Roosevelt elk captured in the Jewell Meadows Wildlife Management Area, and 17 Rocky Mountain elk captured in the Elkhorn Wildlife Management Area, were translocated from Oregon to separate locations on Etolin Island in 1987. About two-thirds of the translocated elk died within 18 months of their release (Lowell 2002). This introduction was strongly supported and partially funded by the Ketchikan Sports and Wildlife Club.

### **Community Characteristics**

The rural area of the Southeast Region is comprised of about 33 small to medium sized communities, ranging in population from 20 or less (Point Baker, Elfin Cove, and Game Creek) to over 8,000 (Sitka) (**Table 1**). Many were established by Tlingit and are situated at historical village sites or were established by Haida (Hydaburg and Kasaan) or Tsimshian (Metlakatla). Population growth in the Southeast Region during the historical period (beginning about 1750) was affected by several waves of in-migration, first by Russian fur traders who established Sitka as their headquarters in the late 1700s. After the sale of Alaska to the United States in 1867, new industries (such as commercial fishing, canneries, mining, and fox farming) and commercial trade, were pursued with the associated influx of outsiders (Worl 1990, George and Bosworth 1988, Smythe 1988).

Beginning in the 1970s, logging camps sprang up and some have persisted as new communities, such as Game Creek and Thorne Bay. Many rural communities in the Southeast Region have at their core a *kwaan* or tribe of Alaska Natives. The territories mapped in 1947 by Goldschmidt and Haas covered all of the Southeast Region (Goldschmidt and Haas 1998). Since 1960 the rural population of the Southeast Region has doubled from 13,102 people in 1960 to 26,343 people in 2010 (**Table 1**). Some of this growth was from new communities established near logging activities and growth in the recreation and tourism industries (Cervený 2005).

**Table 1.** The number of people living in Southeast Region rural communities, 1960–2010  
(Sources: ADLWD 2017, ADCED 2017, and U.S. Bureau of the Census 1995).

Community	1960	1970	1980	1990	2000	2010	2010 Households
Angoon	395	400	465	638	572	459	167
Coffman Cove	0	0	193	186	199	176	89
Craig	273	272	527	1,260	1,397	1,201	523
Edna Bay	135	112	6	86	49	42	19
Elfin Cove	0	49	28	57	32	20	15
Game Creek	0	0	0	61	35	18	10
Gustavus	107	64	98	258	429	442	199
Haines borough	1,000	1,504	1,680	2,117	2,392	2,508	991
Hollis CDP	0	0	0	111	139	112	55
Hoonah	686	748	680	795	860	760	300
Hydaburg	251	214	298	384	382	376	133
Hyder	32	49	77	99	97	87	47
Kake	455	448	555	700	710	557	246
Kasaan	36	30	25	54	39	49	17
Klawock	251	213	318	722	854	755	313
Klukwan	112	103	135	129	139	95	44
Kupreanof	26	36	47	23	23	27	15
Metlakatla	1,135	1,245	1,333	1,464	1,375	1,405	469
Naukati Bay	0	0	0	93	135	113	60
Pelican	135	133	180	222	163	88	70
Petersburg borough	1,502	2,042	2,821	3,207	3,224	2,948	1,252
Point Baker	0	80	90	39	35	15	8
Port Alexander	18	36	86	119	81	52	22
Port Protection	0	0	40	62	63	48	26
Saxman	153	135	273	369	431	411	120
Sitka borough	3,237	6,109	7,803	8,588	8,835	8,881	3,545
Skagway	659	675	814	692	862	920	410
Tenakee Springs	109	86	138	94	104	131	72
Thorne Bay	0	443	377	569	557	471	214
Whale Pass	0	0	90	75	58	31	20
Whitestone	0	0	NA	164	116	114	30
Wrangell borough	2,165	2,358	2,658	2,479	2,448	2,369	1,053
Yakutat borough	230	190	449	534	808	662	270
<b>Total</b>	<b>13,102</b>	<b>17,774</b>	<b>22,284</b>	<b>26,450</b>	<b>27,643</b>	<b>26,343</b>	<b>10,824</b>

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

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

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

State harvest data for elk in Unit 3 is available for the years 1997–2017. Harvest related data for this 20-year period is found in **Table 2**. The table includes harvest reporting data for rural Alaska communities and suggests a pattern of use for elk in Unit 3. Of the total number of hunters (n=359) over this period, 203 (57%) were Federally qualified subsistence users. Among the Federally qualified subsistence users, 182 (90%) were residents of Units 1, 2, 3, 4, or 5.

Only 21 elk hunting events in Unit 3 by Federally qualified subsistence hunters from other regions of the state have occurred over this 20-year period. The maximum number of hunting events by rural residents of a community outside of Southeast Alaska was 6 over this 20-year period (by residents of Tok), but most of these communities were represented by a single elk hunting event in Unit 3. There is no available information indicating a customary and traditional use pattern for elk in Unit 3 by rural residents of communities outside of Southeast Alaska.

The customary and traditional use determinations for other large wildlife species in Unit 3 can provide additional insights on which residents generally exhibit the eight factors for elk, using these other species as proxies. **Table 3** lists the customary and traditional use determinations for moose, deer, and bear in Unit 3 as they relate to those communities that reported elk hunting activity from 1997 to 2017.

**Table 2.** Reported hunting activity and elk harvest in Unit 3 by unit of residency, 1997-2017 (ADF&G 2019a). Highlighted cells represent rural Alaska communities.

Unit of Residency	Hunter Residency	Unit 3 Number of Hunters 1997-2017	Unit 3 Number of Elk Harvested 1997-2017
1	AUKE BAY	4	0
1	DOUGLAS	5	1
1	HAINES	8	1
1	JUNEAU	21	6
1	KETCHIKAN	21	33*
1	METLAKATLA	5	0
1	MEYERS CHUCK	12	1
1	WARD COVE	17	5
2	COFFMAN COVE	18	3
2	CRAIG	19	24
2	EDNA BAY	7	3
2	HOLLIS	4	2
2	HYDABURG	6	7
2	KLAWOCK	14	7
2	NAUKATI BAY	2	1
2	POINT BAKER	2	0
2	THORNE BAY	19	11
3	KAKE	2	0
3	PETERSBURG	21	25
3	WRANGELL	21	28
4	HOONAH	2	0
4	PELICAN	2	0
4	PORT ALEXANDER	2	0
4	SITKA	15	5
4	TENAKEE SPRINGS	1	0
6	CORDOVA	3	1
6	VALDEZ	3	0
7	SEWARD	5	0
8	KODIAK	1	0
9	KING COVE	1	0
9	KING SALMON	1	1
12	TOK	6	2
13	GAKONA	1	0
13	GLENNALLEN	1	0
14	ANCHORAGE	18	2
14	BIG LAKE	1	0
14	BUTTE	1	1

Unit of Residency	Hunter Residency	Unit 3 Number of Hunters 1997-2017	Unit 3 Number of Elk Harvested 1997-2017
14	CHUGIAK	2	0
14	EAGLE RIVER	5	0
14	GIRDWOOD	1	0
14	PALMER	7	0
14	PETERS CREEK	1	0
14	WASILLA	11	1
15	HOMER	2	1
15	KASILOF	1	0
15	KENAI	3	0
15	NINILCHIK	1	0
15	SOLDOTNA	1	0
15	STERLING	2	0
17	DILLINGHAM	1	0
20	DELTA JCT	3	0
20	EIELSON AFB	1	0
20	ESTER	1	0
20	FAIRBANKS	15	2
20	FORT WAINWRIGHT	1	0
20	NORTH POLE	5	1
22	NOME	1	0
22	UNALAKLEET	1	1
-	AK RESIDENT, NON-AK CITY	1	0

\*Some harvest tickets with a Ketchikan address may represent residents of Saxman (Federally qualified subsistence users) that use a post office box.

Residents of Units 1, 2, 3, and 4 that reported elk hunting activity also have a customary and traditional use determination for three or more other large wildlife species in Unit 3. While residents of Unit 5 have not reported elk hunting activity in Unit 3 between 1997 and 2017, they do have a customary and traditional use determination for deer and black bear in Unit 3 and for moose in Unit 3 remainder. No residents of Units 1, 2, 3, 4, or 5 have a customary and traditional use determination for elk in Unit 8, the only other unit in Alaska where elk occur.

Alaska Department of Fish and Game's Division of Subsistence also conducts household subsistence harvest surveys periodically throughout Alaska. Though this survey data is only available for some communities in some years, it is an additional source for documenting patterns of use in rural Alaska. Use, harvest activity, and sharing of goat in Southeast Alaska, as documented by these surveys over

**Table 3.** Customary and traditional use determinations for Moose, Deer, and Black Bear in Unit 3 among communities that reported elk hunting activity from 1997 to 2017 (ADF&G 2019a).

CUSTOMARY AND TRADITIONAL USE DETERMINATIONS					
Unit of Residence	Rural Community	Moose		Deer	Black Bear
		Unit 3	Unit 3 Remainder		
1	HAINES		Yes	Yes	Yes
1	METLAKATLA		Yes	Yes	Yes
1	MEYERS CHUCK	Yes	Yes	Yes	Yes
2	COFFMAN COVE	Yes	Yes	Yes	Yes
2	CRAIG	Yes	Yes	Yes	Yes
2	EDNA BAY	Yes	Yes	Yes	Yes
2	HOLLIS	Yes	Yes	Yes	Yes
2	HYDABURG	Yes	Yes	Yes	Yes
2	KLAWOCK	Yes	Yes	Yes	Yes
2	NAUKATI BAY	Yes	Yes	Yes	Yes
2	POINT BAKER	Yes	Yes	Yes	Yes
2	THORNE BAY	Yes	Yes	Yes	Yes
3	KAKE	Yes	Yes	Yes	Yes
3	PETERSBURG	Yes	Yes	Yes	Yes
3	WRANGELL	Yes	Yes	Yes	Yes
4	HOONAH		Yes	Yes	Yes
4	PELICAN		Yes	Yes	Yes
4	PORT ALEXANDER		Yes	Yes	Yes
4	SITKA		Yes	Yes	Yes
4	TENAKEE SPRINGS		Yes	Yes	Yes
6	CORDOVA		Yes		Yes
8	KODIAK		Yes		Yes
9	KING COVE		Yes		Yes
9	KING SALMON		Yes		Yes
12	TOK		Yes		Yes
13	GAKONA		Yes		Yes
13	GLENNALLEN		Yes		Yes
15	NINILCHIK		Yes		Yes
17	DILLINGHAM		Yes		Yes
20	DELTA JCT		Yes		Yes
22	NOME		Yes		Yes
22	UNALAKLEET		Yes		Yes



time, is represented in **Table 4**. This data, collected from 1996 to 2016, shows a clear pattern of use and sharing of the goat resource throughout rural Southeast Alaska communities.

**Table 4.** The harvest and use of elk by rural communities in the Southeast Region during one-year study periods between 1996 and 2016 (Source: ADF&G 2019b).

Community	Study year	% Households using	% Households attempting to harvest	% Households harvesting	% Households giving away	% Households receiving
Angoon	2012	0.0	0.0	0.0	0.0	0.0
Coffman Cove	1998	12.0	2.0	2.0	0.0	10.0
Craig	1997	1.2	0.0	0.0	0.6	1.2
Edna Bay	1998	0.0	0.0	0.0	0.0	0.0
Haines	2012	1.5	0.0	0.0	0.0	1.5
Hollis	1998	6.5	0.0	0.0	2.2	6.5
Hoonah	2012	0.0	0.8	0.0	0.0	0.0
Hoonah	2016	0.0	0.0	0.0	0.0	0.0
Hydaburg	2012	2.1	0.0	0.0	0.0	2.1
Kake	1996	0.0	0.0	0.0	0.0	0.0
Kasaan	1998	14.3	0.0	0.0	0.0	14.3
Klukwan	1996	3.2	0.0	0.0	0.0	3.2
Naukati Bay	1998	8.0	0.0	0.0	0.0	8.0
Petersburg	2000	4.8	0.8	0.0	0.0	4.8
Saxman	1999	8.2	1.4	1.4	1.4	6.8
Sitka	1996	0.9	0.0	0.0	0.0	0.9
Sitka	2013	2.4	0.0	0.0	0.0	2.4
Thorne Bay	1998	3.4	1.1	1.1	1.1	2.2
Whale Pass	1998	6.7	0.0	0.0	0.0	6.7
Whale Pass	2012	0.0	0.0	0.0	0.0	0.0
Wrangell	2000	8.2	2.0	0.0	0.0	8.2
Yakutat	2000	1.4	0.0	0.0	0.0	1.4

Residents of Units 1–5 have hunted elk in Unit 3 since hunting began in the late 1990s. Their pattern of use of elk has developed in the decades since elk were introduced and hunting has been incorporated into the seasonal round of subsistence harvesting undertaken by residents in the region. This species is harvested with the methods and means common in Southeast Alaska. Subsistence harvesters reach harvest sites by boat, and hunt on foot or with motorized vehicles from the limited Forest Service road system in hunt areas (OSM 2006, SERAC 2019). Elk in Unit 3 are difficult to hunt, and overall success rate of residents from the proposed customary and traditional use communities has been 61% (ADF&G 2019). Although good hunter effort data are not available, elk hunting in Unit 3 appears to be more demanding and less productive in terms of the likelihood of success than deer hunting, and may be equivalent to the success rate of hunters in many moose hunts (OSM 2006). A successful elk hunt provides the hunter with a large quantity of prized meat (OSM 2006, SERAC 2019).

Knowledge of elk hunting skills, values, and lore are transmitted from generation to generation in ways common throughout Southeast Alaska (SERAC 2019). These include transmission through clan and family ties and through participation in hunting with more experienced family and friends. Subsistence hunting and fishing are extremely important to members of the rural communities proposed for a customary and traditional use determination. These activities play a vital social, economic, and cultural role in these communities (OSM 2006).

Residents in these rural communities proposed for customary and traditional use determination depend on a wide range of fish and wildlife resources. The species used include a variety of fish, shellfish, migratory birds, bird eggs, small land mammals, furbearers, marine mammals, berries, plants, and seaweed (George and Bosworth 1988). Large land mammals are particularly important resources needed to meet the subsistence requirements of rural residents (SERAC 2019). Elk specifically now provide substantial cultural, economic, social, and nutritional elements of subsistence to the region's residents (SERAC 2019).

### **Effects of the Proposal**

If this proposal is adopted, it would establish a customary and traditional use determination for elk in Unit 3 for rural residents of Units 1–5. This would exclude rural residents from outside of Southeast Alaska from hunting elk under Federal regulations in Unit 3.

### **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP20-13.

### **Justification**

Residents of Units 1-5 have demonstrated use of elk in Unit 3 and incorporation of this resource into the subsistence patterns of the region. Residents of these units have also demonstrated the use of other large wildlife species within Unit 3 and have a customary and traditional use determination for these species in that unit. This suggests a pattern of use of the area that is likely to extend to elk. Units 1–5 are also near and reasonably accessible to Unit 3 for the harvest of elk by residents of these units. Furthermore, 90% of Federally qualified subsistence users reporting hunting activity for elk in Unit 3 between 1997 and 2017 were rural residents of Units 1–5. Rural residents from outside of Southeast Alaska may be reasonably excluded from the customary and traditional use determination for elk in Unit 3 due to the limited evidence of historical hunt activity and their distance from the resource.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make Allen meeting Chair, Roth, second. 9-0 in favor. Allen sits as meeting Chair
- III. **Approval of Agenda:**  
Allen, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. Westlund seconded. Motion passed unanimously (9-0). Westlund, moved to approve agenda, Dale seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure
- VII. **Chairman Report:** Allen read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** Reppert, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

6/27/2019

DEPARTMENT OF THE INTERIOR Mail - Fwd: [EXTERNAL] Wildlife Proposal



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

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**Fwd: [EXTERNAL] Wildlife Proposal**

1 message

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**AK Subsistence, FW7** <subsistence@fws.gov>

Thu, Jun 27, 2019 at 7:37 AM

To: Theo Matuskowitz <theo\_matuskowitz@fws.gov>, Kayla Mckinney <kayla\_mckinney@fws.gov>, Paul Mckee <paul\_mckee@fws.gov>

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

From: **Chris Guggenbickler** <cggugg@gci.net>

Date: Wed, Jun 26, 2019 at 4:10 PM

Subject: [EXTERNAL] Wildlife Proposal

To: <subsistence@fws.gov>

FSB,

As a resident of Wrangell and someone who has hunted elk on Etolin Island since inception I would like to take the opportunity to comment on proposal WP20-13 which would make a customary and traditional use designation on elk in unit 3. This proposal would lay the groundwork for a later proposal where a rural resident in these areas could put in a proposal asking for subsistence priority on this herd. Consequently this would prohibit residents of Ketchikan and Juneau from participating in this hunt. Ketchikan by the way is where the goats were taken from to trade for the elk that were transplanted on Etolin. I'll just say I am adamantly opposed to someone's effort to use this determination to try to exclude others from participating in this hunt. I actually as a resident of Wrangell would be eligible and benefit from this however I morally can't stomach the thought of using this avenue in a resource grab of a transplanted animal that the legislature intended to be a novelty hunt to benefit all.

Thanks  
Chris Guggenbickler

--

*OSM is in receipt of your comments.*

*Thank you.*

<https://mail.google.com/mail/u/0?ik=d7a022befe&view=pt&search=all&permthid=thread-f%3A1637508557851637978%7Cmsg-f%3A16375085578516...> 1/1

<b>WP20–14 Executive Summary</b>	
<b>General Description</b>	Proposal WP20-14 requests to modify the customary and traditional use determination for goats in Units 1, 4, and 5 to include residents of Units 1-5. <i>Submitted by: Southeast Alaska Regional Advisory Council.</i>
<b>Proposed Regulation</b>	<b>Customary and Traditional Use Determination—Goat</b>
	<i>Units 1, 4, and 5      Residents of Units 1–5.</i>
	<i>Unit 1A                      All rural residents</i>
	<i>Unit 1B                      Residents of Units 1B and 3</i>
	<i>Unit 1C                      Residents of Haines, Kake, Klukwan, Petersburg, Hoonah, and Gustavus</i>
	<i>Unit 1D                      All rural residents</i>
	<i>Unit 4                        Residents of Angoon, Elfin Cove, Funter- Bay, Hoonah, Pelican, Port Alexander, Sitka, and Tenakee</i>
	<i>Unit 5                        Residents of Unit 5A</i>
<b>OSM Preliminary Conclusion</b>	<b>Support</b>
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 Oppose</b>



**DRAFT STAFF ANALYSIS  
WP20-14**

**ISSUES**

Wildlife Proposal WP20-14, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests to modify the customary and traditional use determination for mountain goats (referred to as goats hereafter) in Units 1, 4, and 5 to include residents of Units 1–5.

**DISCUSSION**

The proponent states that customary and traditional use patterns carried over from state management in 1992 inappropriately restrict subsistence use. For this reason the Council has been working to improve customary and traditional use determinations for its region. Under the approach the council has developed, customary and traditional use determinations will be made broadly to ensure that subsistence uses are protected and will be allowed to continue. The Council believes customary and traditional use determinations should not be used to limit or restrict subsistence uses. When there are resource shortages and all subsistence needs cannot be met, the Council believes an Alaska National Interest Lands Conservation Act (ANILCA) Section 804 Subsistence User Prioritization can be used to allocate scarce resources.

Considering goats specifically, the proponent states that historical and contemporary use and sharing of goats is well documented, that local residents travel long distances and with a variety of transportation modes to access this resource, and that goats play an important role in meeting the cultural, economic, social, and nutritional needs of the region’s rural residents. Along with other large land mammals in the region, goats are depended on to sustain the region’s mixed cash-subsistence economy.

**Existing Federal Regulation**

**Customary and Traditional Use Determination—Goat**

<i>Unit 1A</i>	<i>All rural residents</i>
<i>Unit 1B</i>	<i>Residents of Units 1B and 3</i>
<i>Unit 1C</i>	<i>Residents of Haines, Kake, Klukwan, Petersburg, Hoonah, and Gustavus</i>
<i>Unit 1D</i>	<i>All rural residents</i>

*Unit 4*                      *Residents of Angoon, Elfin Cove, Funter Bay, Hoonah, Pelican, Port Alexander, Sitka, and Tenakee*

*Unit 5*                      *Residents of Unit 5A*

**Proposed Federal Regulation**

**Customary and Traditional Use Determination—Goat**

*Unit 1, 4, and 5*                *Rural residents of Units 1-5.*

~~*Unit 1A*~~                      ~~*All rural residents*~~

~~*Unit 1B*~~                      ~~*Residents of Units 1B and 3*~~

~~*Unit 1C*~~                      ~~*Residents of Haines, Kake, Klukwan, Petersburg, Hoonah, and Gustavus*~~

~~*Unit 1D*~~                      ~~*All rural residents*~~

~~*Unit 4*~~                      ~~*Residents of Angoon, Elfin Cove, Funter Bay, Hoonah, Pelican, Port Alexander, Sitka, and Tenakee*~~

~~*Unit 5*~~                      ~~*Residents of Unit 5A*~~

**Relevant Federal Regulation**

**§100.5 Eligibility for subsistence use.**

...

*(c) Where customary and traditional use determinations for a fish stock or wildlife population within a specific area have not yet been made by the Board (e.g., “no determination”), all Alaskans who are residents of rural areas or communities may harvest for subsistence from that stock or population under the regulations in this part.*

## **Extent of Federal Public Lands**

Unit 1 is comprised of approximately 86% of Federal public lands and consist of 69% USDA Forest Service (USFS), 17% National Park Service (NPS), and less than 1% Bureau of Land Management (BLM) managed lands (**see Unit Map**).

Unit 4 is comprised of approximately 92% of Federal public lands and consists of 92% USFS and less than 1% BLM managed lands (**see Unit Map**).

Unit 5 is comprised of approximately 97% of Federal public lands and consists of 63% NPS, 33% USFS, 1% BLM, and less than 1% USFWS managed lands (**see Unit Map**).

Special Requirements for National Park Service Lands: Under the guidelines of ANILCA, National Park Service regulations identify qualified local rural subsistence users in National Parks and Monuments open to subsistence by: 1) identifying resident zone communities which include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and 2) identifying and issuing subsistence use permits to individuals residing outside of the resident zone communities who have a personal or family history of subsistence use.

## **Regulatory History**

At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Federal Subsistence Board (Board) adopted the State's customary and traditional use determination for goats in 1C (50 CFR 22958; May 29, 1992) which included residents of Haines, Klukwan, and Hoonah. The Board did not make a determination for Units 1A, 1B, 1D, 4, and 5; therefore, all rural residents were eligible to hunt under Federal regulations, except that in Unit 1B where there was no Federal subsistence priority for residents of Petersburg, Kupreanof, and outlying areas.

Several proposals were submitted in 1997 to expand the customary and traditional use determination for goats in Unit 1B. Proposal C079, submitted by the State Southeast Regional Fish and Game Advisory Council, was adopted by the Board to remove "except no subsistence for residents of Petersburg, Kupreanof, and outlying areas" from the regulation (50 CFR 66229; December 17, 1997). Proposal P97-02c, submitted by Joe Doerr, was adopted by the Board expanding the customary and traditional use determination for goats in Unit 1B to include residents of Units 1B and 3 (50 CFR 66229; December 17, 1997).

In 1998, the Board adopted proposals P98-07 and P98-08 submitted by the Wrangell and Petersburg Ranger Districts of the Tongass National Forest, respectively (50 CFR 35336; June 29, 1998). This action expanded the customary and traditional use determination for goats in Unit 1C to include the residents of Haines, Kake, Klukwan, Petersburg, and Hoonah. In 2018 the Board adopted proposal WP18-12, submitted by Calvin Casipit, to add the residents of Gustavus to the customary and traditional use determination for goats in Unit 1C (50 CFR 50763; October 9, 2018).

In 1997, proposal P96-06, submitted by the Sitka Tribe of Alaska, was adopted by the Board with modification. This action established a customary and traditional use determination for goats in Unit 4 for

the residents of Angoon, Elfin Cove, Funter Bay, Hoonah, Pelican, Port Alexander, Sitka, and Tenakee Springs (FSB 1996: 128).

In 1998, proposal P98-17, submitted by the Southeast Alaska Subsistence Regional Advisory Council, was adopted by the Board with modification. This action established a customary and traditional use determination for goats in Unit 5 for the residents of Unit 5A (FSB 1998: 87).

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process and present recommendations for regulatory changes (Salazar 2010). During this review in 2016, the Southeast Alaska Council described its view. For example, the Southeast Alaska Council requested, among other things, that the Board adopt customary and traditional use determinations broadly (Bangs 2016:2). The Board responded that the Southeast Alaska Council's recommendation regarding customary and traditional use determinations aligned well with the current process followed statewide in the Federal Subsistence Management Program (Towarak 2016: 5). The Council intends to submit regulatory proposals to the Board requesting to broaden the complex web of customary and traditional use determinations that currently exist in Southeast Alaska (Bangs 2016: 2). The Council has requested, and the Board has adopted, customary and traditional use determinations for all fish (Proposal FP19-17) and for deer (Proposal WP18-02) that include all rural residents of Southeast Alaska. This has greatly simplified these determinations that were originally adopted from State regulations at the formation of the Federal Subsistence Management Program in 1992.

### **Community Characteristics**

The rural area of the Southeast Region is comprised of about 33 small to medium sized communities, ranging in population from 20 or less (Point Baker, Elfin Cove, and Game Creek) to over 8,000 (Sitka) (**Table 2**). Many were established by Tlingit and are situated at historical village sites or were established by Haida (Hydaburg, Kasaan) or Tsimshian (Metlakatla). Population growth in the Southeast Region during the historical period (beginning about 1750) has been affected by several waves of in-migration, first by Russian fur traders who established Sitka as their headquarters in the late 1700s. After the sale of Alaska to the United States in 1867, new industries (such as commercial fishing, canneries, mining, and fox farming) and commercial trade were pursued with the associated influx of outsiders (Worl 1990, George and Bosworth 1988, Smythe 1988).

Beginning in the 1970s, timber logging camps sprang up and some have persisted as new communities, such as Game Creek and Thorne Bay. Many rural communities in the Southeast Region have at their core a *kwaan* or tribe of Alaska Natives. The territories mapped in 1947 by Goldschmidt and Haas covered all of the Southeast Region (Goldschmidt and Haas 1998). Since 1960, the rural population of the Southeast Region has doubled from 13,102 people in 1960 to 26,343 people in 2010 (**Table 2**). Some of this growth has been from new communities established near logging activities and growth in the recreation and tourism industries (Cervený 2005).

**Table 2.** The number of people living at Southeast Region rural communities, 1960–2010 (Sources: ADLWD 2017, ADCCED 2017, and U.S. Bureau of the Census 1995).

Community	1960	1970	1980	1990	2000	2010	Number of households
Angoon	395	400	465	638	572	459	167
Coffman Cove	0	0	193	186	199	176	89
Craig	273	272	527	1,260	1,397	1,201	523
Edna Bay	135	112	6	86	49	42	19
Elfin Cove	0	49	28	57	32	20	15
Game Creek	0	0	0	61	35	18	10
Gustavus	107	64	98	258	429	442	199
Haines borough	1,000	1,504	1,680	2,117	2,392	2,508	991
Hollis CDP	0	0	0	111	139	112	55
Hoonah	686	748	680	795	860	760	300
Hydaburg	251	214	298	384	382	376	133
Hyder	32	49	77	99	97	87	47
Kake	455	448	555	700	710	557	246
Kasaan	36	30	25	54	39	49	17
Klawock	251	213	318	722	854	755	313
Klukwan	112	103	135	129	139	95	44
Kupreanof	26	36	47	23	23	27	15
Metlakatla	1,135	1,245	1,333	1,464	1,375	1,405	469
Naukati Bay	0	0	0	93	135	113	60
Pelican	135	133	180	222	163	88	70
Petersburg borough	1,502	2,042	2,821	3,207	3,224	2,948	1,252
Point Baker	0	80	90	39	35	15	8
Port Alexander	18	36	86	119	81	52	22
Port Protection	0	0	40	62	63	48	26
Saxman	153	135	273	369	431	411	120
Sitka borough	3,237	6,109	7,803	8,588	8,835	8,881	3,545
Skagway	659	675	814	692	862	920	410
Tenakee Springs	109	86	138	94	104	131	72
Thorne Bay	0	443	377	569	557	471	214
Whale Pass	0	0	90	75	58	31	20
Whitestone	0	0	NA	164	116	114	30
Wrangell borough	2,165	2,358	2,658	2,479	2,448	2,369	1,053
Yakutat borough	230	190	449	534	808	662	270
<b>Total</b>	<b>13,102</b>	<b>17,774</b>	<b>22,284</b>	<b>26,450</b>	<b>27,643</b>	<b>26,343</b>	<b>10,824</b>

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

A community or area's customary and traditional use is generally exemplified through these eight factors:

(1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or

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

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

Goat hunting data between 1990 and 2018 shows extensive hunting effort in Units 1, 4, and 5 among rural residents of communities throughout Southeast Alaska and Yakutat (**Table 3**). For Units 1A and 1D in which all rural residents can hunt goats under Federal regulations, 87% (n=170) and 98% (n=1,977) of reported goat hunting activity by Federally qualified subsistence users from 1990 to 2018 was undertaken by rural residents of Units 1-5, respectively.

Goat hunting activity in Units 1A and 1D by Federally qualified subsistence users residing outside of Units 1-5 is also found in **Table 4**. Though there were numerous goat hunting events in Unit 1A and 1D by Federally qualified subsistence users living outside of Southeast Alaska between 1990 and 2018, there is no additional evidence that residents of these units have established a customary and traditional use pattern for this species in these units, or that they directly depend on goats from these populations to meet their subsistence needs. Residents of Unit 12 may occasionally access the Haines Highway area of Unit 1D via the international road system, though that area is dominated by state managed lands.

The Alaska Department of Fish and Game's (ADF&G) Division of Subsistence also conducts household subsistence harvest surveys periodically throughout Alaska. Though this survey data is only available for some communities in some years, it is an additional source for documenting patterns of use in rural Alaska.

Use, harvest activity, and sharing of goat in Southeast Alaska, as documented by these surveys over time, is represented in **Appendix 1**. This data, collected from 1983 to 2016, shows clear patterns of use and sharing of goat throughout rural Southeast Alaska communities.

**Table 3.** Cumulative reported goat hunting events in Units 1, 4, and 5 by rural residents of Units 1-5, 1990-2018 (ADF&G 2019a). Includes successful and unsuccessful hunts. Highlighted cells indicate an existing customary and traditional use determination for residents of the Unit. Empty cells indicate no reported hunting activity.

Community	Residency Unit	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 4	Unit 5A	Unit 5B
HYDER	1A	5						
METLAKATLA	1A	28	7					
NEETS BAY	1A	2				1		
YES BAY	1A	2	2					
MEYERS CHUCK	1B	3	3					
EXCURSION INLET	1C			2				
GUSTAVUS	1C			33	1			
HOBART BAY	1C			31				
HAINES	1D			30	1498	5		
KLUKWAN	1D				3			
SKAGWAY	1D	1		4	386			
COFFMAN COVE	2	6	7			3		
CRAIG	2	41	30	2	1	7	3	
EDNA BAY	2		15	6				
HOLLIS	2	2						
HYDABURG	2	1						
KLAWOCK	2	7	2		1			
NAUKATI BAY	2	3		1		1		
THORNE BAY	2	28	61			2	1	
WHALE PASS	2	1	11	1				
KAKE	3		3	4		10		
PETERSBURG	3	12	777	20	2	6		
WRANGELL	3	11	277	4	2	2		
ANGOON	4			1		22		
BARANOF	4					2		
CUBE COVE	4			1		3		
ELFIN COVE	4			3	1			
FALSE ISLAND	4					4		
FUNTER BAY	4							
GAME CREEK	4			1				
HIDDEN FALLS	4					26		
HCHRY	4							
HOONAH	4		5	44	15	7		
PELICAN	4			1	1	3		
PORT ALEXANDER	4					12		
PORT ARMSTRONG	4					16		
PORT WALTER	4					3		
SITKA	4	15	21	38	27	2756	1	
TENAKEE SPRINGS	4	1		2		11		
WHITESTONE	4		1	1				
CAMP	4							
YAKUTAT	5A	1					109	6

**Table 4.** Cumulative reported goat hunting events in Units 1A and 1D by rural residents residing outside of Units 1-5, 1990-2018 (ADF&G 2019a). Includes successful and unsuccessful hunts. Empty cells indicate no reported hunting activity.

Community	Residency Unit	Unit 1A	Unit 1D
BARROW	26A		1
BETHEL	18	1	
CANTWELL	13	2	
COLD BAY	9D		2
COPPER CENTER	13		1
CORDOVA	6C		2
DELTA JUNCTION	20D		6
FORT GREELY	20D		2
GLENNALLEN	13	1	2
KODIAK	8	7	2
NENANA			4
NOME	22C	2	
NORTHWAY	12		13
NOORVIK	23	3	
PRUDHOE BAY	26B	1	
TOK	12	5	4
UNALAKLEET	22A	1	
UNALASKA	10	2	

The residents of Southeast Alaska have used mountain goat continuously throughout recorded history wherever goat has been found. Goat has been an important source of food, clothing, tools, and fat or grease to the Tlingit, Tsimshian, and Haida groups of Southeast Alaska (de Laguna 1990). Archaeological evidence obtained from the Prince William Sound area suggests that mountain goat "seems to have played a fairly important part in the diet of those who lived or came near the areas where it could be obtained" (de Laguna 1972).

The Tlingit historically exhibited a pattern of hunting mountain goats recurring in specific seasons for many years including the fall, early winter, and spring. During the fall and early winter, when goats are at their fattest, hunts took place in mountainous areas (OSM 1998). Temporary camps were utilized and berries picked and preserved while smoking fish and processing goat meat, providing both efficiency and economy of effort. Oberg's (1973) sources indicated that any meat to be stored was hunted and dried in August. In the spring, when snow had pushed the goats into the tree-line, they were hunted in timbered areas and their fleece collected from brush and branches for use in weaving ceremonial blankets. Starting in the mid-nineteenth century, some Tlingit groups would go directly from the salmon fish camps to hunt mountain goat, deer, and bear (Goldschmidt and Haas 1946: de Laguna 1990).

The people of southeast Alaska employ a variety of means of handling, preparing, preserving, and storing mountain goats which have been traditionally used by past generations. Mountain goats have been used by indigenous peoples of the region as a source of food, clothing, tools, and fat or grease. Goat horns, skins, and



fleece were common trade items among the Tlingits. The horns were used to make spoons, personal ornaments, boxes for storing powder and shot, tool handles and feast dishes. Goat skin was thought to make the best drum heads (Emmons 1991; de Laguna 1990), while the wool was used to weave ceremonial blankets, which could require the wool of approximately three goats and take up to a year to complete. These blankets were found among the Tlingit, Haida, and Tsimshian. According to Tlingit tradition they originated with the Tsimshian and were carried to other groups by intermarriage or migration (Emmons 1991). Goat wool was also used for bedding, twisted into cords, and used for decoration, as in ear ornaments. The fat of the goat was melted and formed into cakes for use as food or to grease the face before blackening or painting (Emmons 1991). Traditionally, the meat was dried or boiled and preserved in oil (Goldschmidt and Haas 1946). If killed in the mountains, the goat was usually butchered and the meat dried on site to make it easier to pack out (de Laguna 1990).

Goat hunting knowledge, skills, values, and lore were traditionally passed down to young men by their maternal uncles. In many communities, a goat hunting area may not be shown to newcomers without kinship ties until they become established as a resident. Young women are taught the weaving of the ceremonial Chilkat blankets, made from goat hair, by their mother or maternal grandmother. These blankets and other items made from goat horns, fleece, and skin are important ceremonial regalia. Blanket wearing is still practiced and taught among Tlingit groups (OSM 1998). To reach goat hunting areas, Tlingit hunters had to climb high into the mountains (Krause 1956). These areas were reached by canoe, with hunting taking place from heads of rivers and lakes adjacent to steep mountains (Oberg 1973). Traditionally, Tlingit groups used bow and arrow or spears to hunt goat. Trained dogs were used to drive the goats down into canyons where hunters waited to spear them (de Laguna 1990). In a harvest study conducted by ADF&G in 1987-88, one Wrangell elder recalled a story his grandfather had told regarding goat hunting. As a young man, the grandfather was sent along with other young men up a mountain to surround and drive the goats down into the valley where hunters waited at the valley entrance (Cohen 1989). Contemporary hunters use firearms for goat hunting, and boats or aircraft to reach goat hunting areas (Scott 2014).

Both past and present harvest of goat in southeast Alaska is demonstrative of a pattern of use in which the harvest is shared or distributed within a defined community. In Tlingit tradition, the meat of a boy's first kill is divided up and distributed, with the belief that this act of sharing would bring luck to the boy in his future hunting. This tradition is still in practice (de Laguna 1972). Goat meat continues to be sought, harvested, used, and shared within and among the communities of Southeast Alaska (**Table 3; Appendix 1**).

### **Effects of the Proposal**

If this proposal was adopted, it would establish a customary and traditional use determination for goats in Units 1A and 1D for rural residents of Units 1-5 and removes eligibility of other rural residents of Alaska living outside of these units. Adoption would also expand the customary and traditional use determinations for goats in Units 1B, 1C, 4, and 5 to include all rural residents of Units 1-5.

## OSM PRELIMINARY CONCLUSION

Support Proposal WP20-14.

### Justification

Residents of Units 1-5 have demonstrated use, harvest, and sharing of goats in Unit 1, 4, and 5. Goats have a clear historical and contemporary role in the subsistence patterns of the region. Residents frequently travel long distances with a variety of transportation types to harvest and share goat resources. Units 1-5 are also near and reasonably accessible to Units 1, 4, and 5 for the harvest and use of goats by residents of these units. Furthermore, more than 87% of Federally qualified subsistence users hunting in Units 1A and 1D between 1990 and 2018 were rural residents of Units 1-5. Rural residents from outside of southeast Alaska may be reasonably excluded from the customary and traditional use determination for goats in Units 1A and 1D due to the limited evidence of historical hunt activity and their distance from the resource.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee**  
**June 6<sup>th</sup>, 2019**  
**ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** **Bezneck**, motion to make **Allen** meeting Chair, **Roth**, second. 9-0 in favor. **Allen** sits as meeting Chair
- III. **Approval of Agenda:**  
**Allen**, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. **Westlund** seconded. Motion passed unanimously (9-0). **Westlund**, moved to approve agenda, **Dale** seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** **Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure**
- VII. **Chairman Report:** **Allen** read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** **Reppert**, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_  
 Minutes Approved By: \_\_\_\_\_  
 Date: \_\_\_\_\_

## APPENDIX 1

**Appendix 1.** The harvest and use of goat by rural communities in the Southeast Region during one-year study periods between 1983 and 2016 (Blank cell=question not asked; Source: ADF&G 2019b).

Community	Study year	% Households using	% Households attempting to harvest	% Households harvesting	% Households giving away	% Households receiving
Angoon	1984	0.0	0.0	0.0	0.0	0.0
Angoon	1987	1.5		0.0	0.0	1.5
Angoon	1996	1.4	1.4	1.4	1.4	1.4
Angoon	2012	2.0	0.0	0.0	0.0	2.0
Beecher Pass	1987	0.0		0.0	0.0	0.0
Coffman Cove	1987	0.0		0.0	0.0	0.0
Coffman Cove	1998	2.0	0.0	0.0	0.0	2.0
Craig	1987	1.0		0.0	0.0	1.0
Craig	1997	0.0	0.0	0.0	0.0	0.0
Edna Bay	1987	15.0		0.0	0.0	15.0
Edna Bay	1998	0.0	0.0	0.0	0.0	0.0
Elfin Cove	1987	0.0		0.0	0.0	0.0
Game Creek	1996	0.0	0.0	0.0	0.0	0.0
Gustavus	1987	4.1		0.0	0.0	4.1
Haines	1983	12.9	18.4	9.5	2.7	4.1
Haines	1987	6.2		0.2	0.0	6.2
Haines	1996	19.4	6.5	5.4	6.5	14.0
Haines	2012	10.6	7.6	3.8	2.3	8.3
Hollis	1987	4.1		4.1	4.1	0.0
Hollis	1998	2.2	2.2	2.2	2.2	0.0
Hoonah	1985	0.0	0.0	0.0		
Hoonah	1987	0.5		0.0	0.0	0.5
Hoonah	1996	1.3	0.0	0.0	0.0	1.3
Hoonah	2012	0.0	0.8	0.0	0.0	0.0
Hoonah	2016	0.0	0.0	0.0	0.0	0.0
Hydaburg	1987	0.0		0.0	0.0	0.0
Hydaburg	1997	0.0	0.0	0.0	0.0	0.0
Hydaburg	2012	0.0	0.0	0.0	0.0	0.0
Hyder	1987	12.1		9.1	0.0	3.0
Kake	1985	0.0	2.9	0.0		
Kake	1987	0.0		0.0	0.0	0.0
Kake	1996	0.0	0.0	0.0	0.0	0.0
Kasaan	1987	0.0		0.0	0.0	0.0
Kasaan	1998	0.0	0.0	0.0	0.0	0.0
Klawock	1984	0.0	0.0	0.0	0.0	0.0
Klawock	1987	0.0		0.0	0.0	0.0
Klawock	1997	0.0	0.9	0.0	0.0	0.0
Klukwan	1983	3.0	12.1	3.0	3.0	0.0
Klukwan	1987	7.1		0.0	0.0	7.1
Klukwan	1996	25.8	9.7	6.5	6.5	19.4
Metlakatla	1987	0.6		0.3	0.3	0.3

Community	Study year	% Households using	% Households attempting to harvest	% Households harvesting	% Households giving away	% Households receiving
Meyers Chuck	1987	0.0		0.0	0.0	0.0
Naukati Bay	1998	6.0	0.0	0.0	0.0	6.0
Pelican	1987	0.0		0.0	0.0	0.0
Petersburg	1987	1.1		0.0	0.0	1.1
Petersburg	2000	1.6	0.8	0.8	0.0	1.6
Point Baker	1987	0.0		0.0	0.0	0.0
Point Baker	1996	0.0	0.0	0.0	0.0	0.0
Port Alexander	1987	3.0		0.0	0.0	3.0
Port Protection	1987	4.0		0.0	0.0	4.0
Port Protection	1996	0.0	0.0	0.0	0.0	0.0
Saxman	1987	1.4		0.0	0.0	1.4
Saxman	1999	0.0	0.0	0.0	0.0	0.0
Sitka	1987	0.7		0.7	0.0	0.0
Sitka	1996	5.6	4.7	2.7	2.4	2.8
Sitka	2013	2.6	0.7	0.0	0.7	2.6
Skagway	1987	7.3		0.5	0.5	6.8
Tenakee Springs	1984	0.0	0.0	0.0	0.0	0.0
Tenakee Springs	1987	0.0		0.0	0.0	0.0
Thorne Bay	1987	6.1		1.1	0.0	5.1
Thorne Bay	1998	3.4	1.1	1.1	1.1	2.2
Whale Pass	1987	0.0		0.0	0.0	0.0
Whale Pass	1998	0.0	0.0	0.0	0.0	0.0
Whale Pass	2012	14.3	14.3	14.3	4.8	0.0
Whitestone Camp	1996	0.0	0.0	0.0	0.0	0.0
Wrangell	1987	7.7		3.0	2.3	6.2
Yakutat	1984	12.0	8.0	6.0	6.0	8.0
Yakutat	1987	2.3		0.0	0.0	2.3
Yakutat	2000	18.0	3.6	2.2	2.9	15.8
Yakutat	2015	5.0	0.0	0.0	4.0	5.0



<b>WP20–15 Executive Summary</b>															
<b>General Description</b>	Proposal WP20-15 requests to modify the customary and traditional use determination for moose in Units 1 and 3 to include residents of Units 1-5. <i>Submitted by: Southeast Alaska Regional Advisory Council.</i>														
<b>Proposed Regulation</b>	<p><b>Customary and Traditional Use Determination—Moose</b></p> <table> <tr> <td><b>Unit 1 and 3</b></td> <td><b>Residents of Units 1, 2, 3, 4, and 5</b></td> </tr> <tr> <td><i>Unit 1A</i></td> <td><i>All rural residents</i></td> </tr> <tr> <td><i>Unit 1B</i></td> <td><i>Residents of Units 1, 2, 3, and 4</i></td> </tr> <tr> <td><i>Unit 1C</i></td> <td><i>Residents of Units 1, 2, 3, 4, and 5</i></td> </tr> <tr> <td><i>Unit 1D</i></td> <td><i>Residents of Unit 1D</i></td> </tr> <tr> <td><i>Unit 3 Mitkof and Wrangell Islands</i></td> <td><i>Residents of Units 1B, 2, and 3</i></td> </tr> <tr> <td><i>Unit 3 remainder</i></td> <td><i>All rural residents</i></td> </tr> </table>	<b>Unit 1 and 3</b>	<b>Residents of Units 1, 2, 3, 4, and 5</b>	<i>Unit 1A</i>	<i>All rural residents</i>	<i>Unit 1B</i>	<i>Residents of Units 1, 2, 3, and 4</i>	<i>Unit 1C</i>	<i>Residents of Units 1, 2, 3, 4, and 5</i>	<i>Unit 1D</i>	<i>Residents of Unit 1D</i>	<i>Unit 3 Mitkof and Wrangell Islands</i>	<i>Residents of Units 1B, 2, and 3</i>	<i>Unit 3 remainder</i>	<i>All rural residents</i>
<b>Unit 1 and 3</b>	<b>Residents of Units 1, 2, 3, 4, and 5</b>														
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<i>Unit 1C</i>	<i>Residents of Units 1, 2, 3, 4, and 5</i>														
<i>Unit 1D</i>	<i>Residents of Unit 1D</i>														
<i>Unit 3 Mitkof and Wrangell Islands</i>	<i>Residents of Units 1B, 2, and 3</i>														
<i>Unit 3 remainder</i>	<i>All rural residents</i>														
<b>OSM Preliminary Conclusion</b>	<b>Support</b>														
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>															
<b>Interagency Staff Committee Comments</b>															
<b>ADF&amp;G Comments</b>															
<b>Written Public Comments</b>	<b>1 Oppose</b>														

**DRAFT STAFF ANALYSIS  
WP20-15**

**ISSUES**

Wildlife Proposal WP20-15, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests to modify the customary and traditional use determination for moose in Units 1 and 3 to include residents of Units 1-5.

**DISCUSSION**

The proponent states that customary and traditional use patterns carried over from state management in 1992 inappropriately restrict subsistence use. For this reason, the Council has been working to improve customary and traditional use determinations for its region. Under the approach it has developed, customary and traditional use determinations will be made broadly to ensure that subsistence uses are protected and will be allowed to continue. The Council believes customary and traditional use determinations should not be used to limit or restrict subsistence uses. When there are resource shortages and all subsistence needs cannot be met, the Council believes and Alaska National Interest Lands Conservation Act (ANILCA) Section 804 Subsistence User Prioritization can be used to allocate scarce resources.

Considering moose specifically, the proponent indicates that historical and contemporary use and sharing of moose is well documented, that local residents travel long distances and with a variety of transportation modes to access this resource, and that moose play an important role in meeting the cultural, economic, social, and nutritional needs of the region's rural residents. Along with other large land mammals in the region, moose are depended on to sustain the region's mixed cash-subsistence economy.

**Existing Federal Regulation**

**Customary and Traditional Use Determination—Moose**

<i>Unit 1A</i>	<i>All rural residents</i>
<i>Unit 1B</i>	<i>Residents of Units 1, 2, 3, and 4</i>
<i>Unit 1C</i>	<i>Residents of Units 1, 2, 3, 4, and 5</i>
<i>Unit 1D</i>	<i>Residents of Unit 1D</i>
<i>Unit 3 Mitkof and Wrangell Islands</i>	<i>Residents of Units 1B, 2, and 3</i>
<i>Unit 3 remainder</i>	<i>All rural residents</i>

## Proposed Federal Regulation

### Customary and Traditional Use Determination—Moose

<i>Units 1 and 3</i>	<i>Rural residents of 1, 2, 3, 4, and 5</i>
<i>Unit 1A</i>	<i>All rural residents</i>
<i>Unit 1B</i>	<i>Residents of Units 1, 2, 3, and 4</i>
<i>Unit 1C</i>	<i>Residents of Units 1, 2, 3, 4, and 5</i>
<i>Unit 1D</i>	<i>Residents of Unit 1D</i>
<i>Unit 3 Mitkof and Wrangell Islands</i>	<i>Residents of Units 1B, 2, and 3</i>
<i>Unit 3 remainder</i>	<i>All rural residents</i>

## Relevant Federal Regulation

### §100.5 Eligibility for subsistence use.

...

*(c) Where customary and traditional use determinations for a fish stock or wildlife population within a specific area have not yet been made by the Board (e.g., “no determination”), all Alaskans who are residents of rural areas or communities may harvest for subsistence from that stock or population under the regulations in this part.*

## Extent of Federal Public Lands

Unit 1 is comprised of approximately 86% of Federal public lands and consists of 69% U.S. Forest Service (USFS), 17% National Park Service (NPS), and less than 1% Bureau of Land Management (BLM) managed lands (see **Unit Map**).

Unit 3 is comprised of approximately 90% of Federal public lands and consists entirely of USFS managed lands (see **Unit Map**).

## Background

Moose likely immigrated to southeast Alaska quite a bit later than the initial human immigration. Most of the moose migrations were by way of river valley corridors from the Canadian interior through the Coast Range. Moose began naturally populating areas in Unit 1 in the early to mid-1900s (Barten 2004:22). The coastal mountains probably inhibited the rapid movement of moose into this area. By the 1950s, moose were present in all major drainages in southeast Alaska (ADF&G 1989).

Moose are thought to have entered Unit 1A from interior British Columbia via the Unuk River drainage, with a resident population established in the unit sometime in the early 1900s (OSM 2004).

Some Unuk River moose may seasonally migrate across the international border; the Canadian portion of the drainage has high quality moose habitat. Moose were transplanted to the Chickamin River drainage in 1963 but the transplant effort was not considered successful.

In Unit 1D, moose migrated to the Chilkat River Valley from drainages in Canada around 1930 (Barten 2004:45). In 1963, moose were observed in the Chilkat Range southwest of Haines. These animals probably originated from the Chilkat Valley population near Haines. Moose were first documented in western Unit 1C in 1962 on the Bartlett River just inside Glacier Bay. In 1965, moose were sighted for the first time along the Endicott River and St. James Bay areas, and moose were common in Adams Inlet at the head of Glacier Bay by the 1970s (Barten 2004:23). Fifteen moose calves were introduced to Berners Bay in 1958 and a supplemental release of six more calves occurred in 1960.

The first sightings of moose occurred in the Gustavus area in 1968 (Barten 2004:22–23). It is unclear when moose began populating the downriver portions of the Taku River drainage, southeast of Juneau, but Taku Tlingit were harvesting moose prior to 1946 from upriver areas (Goldschmidt and Haas 1998:43, 112, 116). Moose have only been colonizing Unit 3 since the early 1960s and were likely established through natural migration of expanding moose populations along the Alaska portion of the Stikine River drainage in Unit 1B (OSM 1997).

### **Regulatory History**

In 1990 the Federal Subsistence Management Program adopted most of the customary and traditional use determinations made by the State of Alaska. For moose in Unit 1B including only the Stikine River drainages, the determination was for residents of Wrangell. For moose in Unit 1B north of the LeConte Glacier, and in Unit 1C at Berner's Bay, no subsistence priority was provided. For moose in Unit 1D, the determination was for residents of Unit 1D. No determination was made for moose in Units 1A, 1C (other than Berner's Bay), or 3, therefore all rural residents of Alaska were eligible to hunt under Federal regulations in these areas.

In 2004, Proposal WP04-18 was submitted by Louie Wagner to establish a customary and traditional use determination for moose in Unit 1A to include the residents of Unit 1A. The Federal Subsistence Board (Board) rejected this proposal in deference to the Council recommendation that there was no need to be more restrictive at that time and that the action would unnecessarily eliminate the ability of some rural residents to hunt for moose in Unit 1A (FSB 2004: 23).

The customary and traditional use determination for moose in Unit 1B received considerable attention in 1997 when five proposals were submitted to the Board to expand the determination in each part of Unit 1B. The Board opted to adopt Proposal P97-04 with modification, in deference to the Council, and rejected the others (FSB 1997: 15). This proposal was submitted by the USFS and the Council and sought to expand the customary and traditional use determination in Unit 1B, north of LeConte Glacier, to include all rural residents of Units 1B, 2, 3, and 4. The modification was to include the entirety of Unit 1B in the determination, thereby eliminating determinations specific to just portions of the Unit.

In 2002, Proposal WP02-14 requested removal of the “no Federal subsistence priority” determination for moose in Berners Bay drainages of Unit 1C. Although the Council requested that the Board defer the proposal for one year, they withdrew the proposal before the next regulatory cycle (SERAC 2002; FWS 2003). In 2008, Proposal WP08-06a was submitted by Chuck Burkhardt to establish a customary and traditional use determination for moose in Unit 1C at Berner’s Bay to include residents of 1C and 1D. The Board voted to defer this proposal in deference to the Council to look at a broader scope of users that may have warranted inclusion in a determination (FSB 2008: p.138). This proposal was then brought back to the Board in 2010 as Proposal WP10-18a. The Board took no action on the proposal as they adopted WP10-11 submitted by the Council, establishing a customary and traditional use determination for moose in all of Unit 1C to include residents of Units 1-5 (FSB 2010: 148).

In 1997, Proposal P97-10 was submitted by the USFS and the Council to establish a customary and traditional use determination for moose in Unit 3 on Wrangell and Mitkof Islands for the residents of Units 1B, 2, and 3. This proposal was adopted by the Board.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process and present recommendations for regulatory changes (Salazar 2010). During this review in 2016, the Southeast Alaska Council described its view. For example, the Southeast Alaska Council requested, among other things, that the Board adopt customary and traditional use determinations broadly (Bangs 2016:2). The Board responded that the Southeast Alaska Council’s recommendation regarding customary and traditional use determinations aligned well with the current process followed statewide in the Federal Subsistence Management Program (Towarak 2016: 5). The Council intends to submit regulatory proposals to the Board requesting to broaden the complex web of customary and traditional use determinations that currently exist in Southeast Alaska (Bangs 2016: 2). The Council has requested, and the Board has adopted, customary and traditional use determinations for all fish (Proposal FP19-17) and for deer (Proposal WP18-02) that include all rural residents of Southeast Alaska. This has greatly simplified these determinations that were originally adopted from State regulations at the formation of the Federal Subsistence Management Program in 1992.

### **Community Characteristics**

The rural area of the Southeast Region is comprised of about 33 small to medium sized communities, ranging in population from 20 or less (Point Baker, Elfin Cove, and Game Creek) to over 8,000 (Sitka) (**Table 1**). Many were established by Tlingit and are situated at historical village sites or were established by Haida (Hydaburg and Kasaan) or Tsimshian (Metlakatla). Population growth in the Southeast Region during the historical period (beginning about 1750) has been affected by several waves of in-migration, first by Russian fur traders who established Sitka as their headquarters in the late 1700s. After the sale of Alaska to the United States in 1867, new industries (such as commercial fishing, canneries, mining, and fox farming) and commercial trade, were pursued with the associated influx of outsiders (Worl 1990, George and Bosworth 1988, Smythe 1988).

**Table 1.** The number of people living in Southeast Region rural communities, 1960–2010 (Sources: ADLWD 2017, ADCED 2017, and U.S. Bureau of the Census 1995).

Community	1960	1970	1980	1990	2000	2010	Number of households
Angoon	395	400	465	638	572	459	167
Coffman Cove	0	0	193	186	199	176	89
Craig	273	272	527	1,260	1,397	1,201	523
Edna Bay	135	112	6	86	49	42	19
Elfin Cove	0	49	28	57	32	20	15
Game Creek	0	0	0	61	35	18	10
Gustavus	107	64	98	258	429	442	199
Haines borough	1,000	1,504	1,680	2,117	2,392	2,508	991
Hollis CDP	0	0	0	111	139	112	55
Hoonah	686	748	680	795	860	760	300
Hydaburg	251	214	298	384	382	376	133
Hyder	32	49	77	99	97	87	47
Kake	455	448	555	700	710	557	246
Kasaan	36	30	25	54	39	49	17
Klawock	251	213	318	722	854	755	313
Klukwan	112	103	135	129	139	95	44
Kupreanof	26	36	47	23	23	27	15
Metlakatla	1,135	1,245	1,333	1,464	1,375	1,405	469
Naukati Bay	0	0	0	93	135	113	60
Pelican	135	133	180	222	163	88	70
Petersburg borough	1,502	2,042	2,821	3,207	3,224	2,948	1,252
Point Baker	0	80	90	39	35	15	8
Port Alexander	18	36	86	119	81	52	22
Port Protection	0	0	40	62	63	48	26
Saxman	153	135	273	369	431	411	120
Sitka borough	3,237	6,109	7,803	8,588	8,835	8,881	3,545
Skagway	659	675	814	692	862	920	410
Tenakee Springs	109	86	138	94	104	131	72
Thorne Bay	0	443	377	569	557	471	214
Whale Pass	0	0	90	75	58	31	20
Whitestone	0	0	NA	164	116	114	30
Wrangell borough	2,165	2,358	2,658	2,479	2,448	2,369	1,053
Yakutat borough	230	190	449	534	808	662	270
<b>Total</b>	<b>13,102</b>	<b>17,774</b>	<b>22,284</b>	<b>26,450</b>	<b>27,643</b>	<b>26,343</b>	<b>10,824</b>

Beginning in the 1970s, timber logging camps sprang up and some have persisted as new communities, such as Game Creek and Thorne Bay. Many rural communities in the Southeast Region have at their core a *kwaan* or tribe of Alaska Natives. The territories mapped in 1947 by Goldschmidt and Haas covered all of the Southeast Region (Goldschmidt and Haas 1998). Since 1960 the rural population of

the Southeast Region has doubled from 13,102 people in 1960 to 26,343 people in 2010. Some of this growth has been from new communities established near logging activities and growth in the recreation and tourism industries (Cervený 2005).

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

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

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

Moose hunting data between 1990 and 2018 shows extensive hunting effort in Units 1 and 3 among rural residents of communities throughout Southeast Alaska and Yakutat (**Table 3**). For Units 1A and 3 remainder, in which all rural residents can hunt moose under Federal regulations, 100% (n=104) and 99% (n=4,336) of reported moose hunting activity by Federally qualified subsistence users from 1990 to 2018 was undertaken by rural residents of Units 1–5, respectively.

**Table 3.** Cumulative reported moose hunting events in Units 1 and 3 by rural residents of Units 1-5, 1990-2018 (ADF&G 2019a). Includes successful and unsuccessful hunts. Highlighted cells indicate an existing customary and traditional use determination for residents of the Unit. Empty cells indicate no reported hunting activity.

Community	Residency Unit	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Unit 3 Wrangell / Mitkof	Unit 3 Remainder
LORING	1A	1					
METLAKATLA	1A	62	6	1			7
MEYERS CHUCK	1B		6	2			1
EXCURSION INLET	1C			23			
GUSTAVUS	1C			1838		1	2
HOBART BAY	1C		2	14			
SWANSON HARBOR	1C			5			
HAINES	1D		4	221	3959	2	13
KLUKWAN	1D				188		
MOSQUITO LAKE	1D				2		
PORT CHILKOOT	1D				1		
SKAGWAY	1D			23	73		1
COFFMAN COVE	2	2	12			20	21
CRAIG	2	10	29	8		19	79
DORA BAY	2	4					
EDNA BAY	2		7	1		4	3
HOLLIS	2	1				1	4
HYDABURG	2		1	1			10
KLAWOCK	2	2	6	1		1	52
NAUKATI BAY	2	4	1	1		2	4
POINT BAKER	2						15
POLK INLET	2	1	2				
PORT ALICE	2		2				
PORT PROTECTION	2		4			2	10
THORNE BAY	2	8	23	1		10	31
WHALE PASS	2		1			1	7
KAKE	3		4	1		10	1792
PETERSBURG	3	3	3517	135		5996	1566
WRANGELL	3	6	3866	5	1	1495	359
ANGOON	4			16			5
CUBE COVE	4						1
ELFIN COVE	4			32			
FUNTER BAY	4			2			
GAME CREEK	4			3			
HIDDEN FALLS HATCHERY	4						2
HOONAH	4		2	278	3	1	27



Community	Residency Unit	Unit 3					Unit 3 Remainder
		Unit 1A	Unit 1B	Unit 1C	Unit 1D	Wrangell / Mitkof	
PELICAN	4			11		4	
PORT ALEXANDER	4		4	9			12
PORT ARMSTRONG	4						
PORT WALTER	4						3
PYBUS BAY	4						6
SITKA	4		103	322	31	58	286
TENAKEE SPRINGS	4			16	6	1	3
WHITESTONE CAMP	4			1			
YAKUTAT	5A			5			2

Moose hunting activity in Unit 3 remainder by Federally qualified subsistence users residing outside of Units 1-5 is represented in **Table 4**. Only 23 moose hunting events in Unit 3 remainder by Federally qualified subsistence hunters from other regions of the state have occurred over the 20-year period. The maximum number of hunting events by rural residents of a community outside of Southeast Alaska was 17 over the 20-year period (residents of Kodiak), but all other communities were represented by one or two moose hunting events in Unit 3 remainder. There is no available information indicating a customary and traditional use pattern for moose in Unit 3 by rural residents of communities outside of southeast Alaska.

**Table 4.** Cumulative reported moose hunting events in Unit 3 remainder by rural residents residing outside of Units 1-5, 1990-2018 (ADF&G 2019a). Includes successful and unsuccessful hunts.

Community	Residency Unit	Unit 3 Remainder
KODIAK	8	17
UNALASKA	10	1
TOK	12	2
GLENNALLEN	13	1
NINILCHIK	15C	2

The Alaska Department of Fish and Game Division of Subsistence also conducts household subsistence harvest surveys periodically throughout Alaska. Though this survey data is only available for some communities in some years, it is an additional source for documenting patterns of use in rural Alaska. Use, harvest activity, and sharing of moose in Southeast Alaska, as documented by these surveys over time, is represented in **Appendix 1**. This data, collected from 1983 to 2016, show a clear pattern of use and sharing of the moose resource throughout rural Southeast Alaska communities.

Even before moose migrated into the region, moose skins and sinew were valued and traded, probably along with moose meat, by the Tlingit, Haida, and Tsimshian of Southeast Alaska (OSM 1997). It appears that the Tlingit had traded with hunters in other regions well before moose were in locally

hunnable areas (ADF&G 1992). As soon as moose became available, both Native and non-Native local hunters began utilizing this resource.

Use of moose in Southeast Alaska extends back to its first appearance in the region by the 1930s. Emmons (1991) lists among Tlingit crests that of moose for the Raven moiety, and several house groups throughout Southeast Alaska are named after moose. Traditional teaching about and understanding of moose extends well into prehistory as is indicated by documented trading between the indigenous people of Southeast Alaska and those of the Canadian interior (OSM 1997).

Southeast Alaska moose populations are associated with mainland riparian habitats with suitable forage of willow and dogwood. Moose are confined to the valleys around the large transmontane rivers and to areas recently exposed by receding glaciers. The habitat being restricted in such a way makes boat access particularly effective, especially for communities that live relatively close to hunting areas (OSM 1997). Traditionally, the Native peoples of Southeast Alaska were able to travel throughout the region by boat, and that tradition continues with fishing boats, skiffs, or other small boats (OSM 1997). Contemporary access is enhanced over much of the area because of the presence of roads.

Techniques for preparation and preservation of moose by the indigenous residents of the region are not well documented. Even though moose is a recent arrival in the region, its use generally follows patterns established and modified by application of contemporary technology for other wild meats (OSM 1997). Most moose meat is now frozen or processed into sausage or jerky (ADF&G 1992).

Patterns of sharing moose are evident throughout the region. Nearly every rural community in the region used moose in the years in which subsistence use studies were conducted, even though no moose were harvested in many (**Appendix 1**). This illustrates the cross-community sharing in Southeast Alaska. Moose is actively exchanged in potlatches and other feasts, as well as for non-ceremonial food (OSM 1997). Data on sharing of moose parts other than meat are not available.

The residents of Southeast Alaska harvest a wide variety of resources. These include marine and intertidal resources, as well as upland wildlife species including birds, goats, deer, moose, and black and brown bear (OSM 1997). Moose can be an important food resource because of its large size compared to other land mammals. Its large size promotes inter-community and intra-community sharing, allowing many people to use moose while a relatively small number of people harvest moose. Resource use in these communities tends to be opportunistic, with resources harvested when available (ADF&G 1992). Household surveys indicate that in communities across Southeast Alaska, a small proportion of households in a community produce the greatest amount of fish and wildlife resources, which is then redistributed among households in the community and beyond (Smythe 1988).

## Effects of the Proposal

If this proposal was adopted, it would establish a customary and traditional use determination for moose in Units 1A and 3 remainder for residents of Units 1–5. Rural residents of Alaska living outside of these units would no longer be eligible to hunt moose under Federal regulations in Units 1A and 3 remainder. Adoption would also expand the customary and traditional use determinations for moose in Units 1B, 1C, 1D, and Unit 3 (Wrangell and Mitkof Islands) to include all rural residents of Units 1–5.

## OSM PRELIMINARY CONCLUSION

Support Proposal WP20-15.

## Justification

Residents of Units 1–5 have demonstrated use, harvest, and sharing of moose in Units 1 and 3. Moose have a clear historical and contemporary role in the subsistence patterns of the region. Residents frequently travel long distances with a variety of transportation types to harvest and share moose resources. Units 1-5 are also near and reasonably accessible to Units 1 and 3 for the harvest and use of moose by residents of these units. Furthermore, more than 99% of the moose hunting by Federally qualified subsistence users in Units 1A and 3 remainder was by rural residents of Units 1–5 between 1990 and 2018. Rural residents from outside of southeast Alaska may be reasonably excluded from the customary and traditional use determination for moose in Unit 3 due to the limited evidence of historical hunt activity and their distance from the resource.

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## WRITTEN PUBLIC COMMENTS

**Ketchikan Advisory Committee  
June 6<sup>th</sup>, 2019  
ADF&G Conference Room**

- I. **Call to Order:** 5:40pm by Matt Allen, Secretary
- II. **Roll Call:** 8 voting members present, 1 via phone  
**Members Present:** Allen, Crittenden, Dale, James, Westlund, Roth, Shaw, Bezneck, Fox, Scoblic (Phone)  
**Members Absent (Excused):** Doherty, McQuarrie, Skan, Franulovich, Miller  
**Members Absent (Unexcused):**  
**Number Needed for Quorum on AC:** 8  
**List of User Groups and Public Present:** Public, Sportfish Charter, ADFG (Sport Fish, Wildlife)  
**Motion:** Bezneck, motion to make **Allen** meeting Chair, **Roth**, second. 9-0 in favor. **Allen** sits as meeting Chair
- III. **Approval of Agenda:**  
**Allen**, motion to amend agenda to include discussion of Federal Subsistence Proposals 10, 11, 13,14. **Westlund** seconded. Motion passed unanimously (9-0). **Westlund**, moved to approve agenda, **Dale** seconded. Motion passed unanimously (9-0)
- IV. **Approval of Previous Meeting Minutes:**  
Previous meeting minutes incomplete at this time
- V. **Fish and Game Staff Present:**  
Kelly Reppert, Ross Dorendorf, Tessa Hasbrouck
- VI. **Guests Present:** **Jim Moody, Nick Hashagan, Martin Caplan, Tony Azure**
- VII. **Chairman Report:** **Allen** read co-chair letter from Scoblic/Doherty
- VIII. **ADF&G Sportfish Report:** **Reppert**, report regarding catch and release chinook fishing. Discussion and comment followed report.
- IX. **Old Business:**  
Federal Subsistence Proposals 2020-2022, WP20-01-08, WP20-10-15
- X. **New Business:**  
Catch and Release of chinook by Charter fishermen  
Set next meeting date, September 12<sup>th</sup>, 2019, 5:30pm ADFG Conference Room

Federal Subsistence Management Program 2020-2022 Wildlife Proposal Comments			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose /Abstain	Comments, Discussion (list Pros and Cons), Amendments to Proposal, Voting Notes
WP20-01	Southeast, Moose, Unit 1C, Eliminate Unit 1C – Berners Bay moose hunt		
Support	8	0/1 abstain	A biological concern does not currently exist necessitating a subsistence priority. Majority of traditional use comes from Juneau area. A fair system is currently in place to provide for opportunity
WP20-02	Southeast, Deer, Unit 2, Remove harvest limits to non-federally qualified users		
Support	9	0	We support State managers in their assessment of the deer population and the opportunity it can support.
WP20-03	Southeast, Deer, Unit 2, Eliminate doe harvest		
Oppose	1	8	Though the AC does not agree with doe harvest, we do not support this proposal because it would have minimal impact.
WP20-04	Southeast, Deer, Unit 2, Revise harvest limit		
Oppose	3	6	Some AC members support cessation of doe harvest if only for a short period of time.
WP20-05	Southeast, Deer, Unit 2, Establish a registration permit for does		
Support	7	1/1	AC supports the proposal as it may lead to better data for management.
WP20-06	Southeast, Deer, Unit 2, Revise season		
Support	9	0	AC supports removal of January hunt due to small amount of harvest, reduced quality of meat and difficulty in distinguishing bucks and does.
WP20-07	Southeast, Deer, Unit 2, Revise harvest limit		
Support	9	0	
WP20-08	Statewide, All Trapping Species, Require traps or snares to be marked with name or State Identification number		
Oppose	1	8	Though some type of compromise should be reached in regards to labelling of traps/snares a one size fits all regulation could be overly burdensome in some areas
WP20-09	Southeast, Beaver, Units 1-4, Revise trapping season		
No Action			
WP20-10	Statewide, Black Bear, Units 1-5, Revise Customary and Traditional Use Determination		

Oppose	2	6	Hunting of Black Bear is not customary and traditional in all units residing in Southeast
WP20-11	Statewide, Brown Bear, Units 1-5, Revise Customary and Traditional Use Determination		
	3	4	Hunting of Brown Bear is not customary and traditional in all units residing in Southeast.
WP20-12	Southeast, Deer, Unit 3, Revise hunt areas, season dates, and harvest limits		
WP20-13	Statewide, Elk, Unit 3, Establish Customary and Traditional Use Determination		
	0	9	This is a population introduced by the State in 1986, due to this fact we do not believe this population is traditional and customary for any Unit in Southeast Alaska. The authors of this proposal do not demonstrate how this particular species in this area has been used to meet the definition as customary and traditional.
WP20-14	Statewide, Goat, Unit 1-5, Revise Customary and Traditional Use Determination		
	4	4	Hunting of Mountain Goat is not Customary and Traditional in all Units residing in Southeast.
WP20-15	Statewide, Moose, Unit 1-5, Revise Customary and Traditional Use Determination		
	0	8	Hunting of Moose is not customary and traditional in all units residing in Southeast.
WP20-16	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			
WP20-17	Statewide, Wolf, Unit 2, Eliminate harvest limit/quota and revise sealing requirement		
No Action			

Adjournment:

Minutes Recorded By: \_\_\_\_\_

Minutes Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDIX 1

**Appendix 1.** The harvest and use of moose by rural communities in the Southeast Region during one-year study periods between 1983 and 2016 (Blank cell=question not asked; Source: ADF&G 2019b).

Community	Study year	% Households using moose	% Households attempting to harvest moose	% Households harvesting moose	% Households giving away moose	% Households receiving moose
Angoon	1984	5.3	0.0	0.0	0.0	5.3
Angoon	1987	8.4		0.0	1.5	8.4
Angoon	1996	2.7	0.0	0.0	0.0	2.7
Angoon	2012	5.9	0.0	0.0	2.0	5.9
Beecher Pass	1987	20.0		20.0	20.0	0.0
Coffman Cove	1987	4.9		0.0	0.0	4.9
Coffman Cove	1998	30.0	8.0	4.0	6.0	28.0
Craig	1987	7.4		1.0	0.0	6.4
Craig	1997	11.0	0.6	0.6	2.3	11.0
Edna Bay	1987	25.0		5.0	0.0	20.0
Edna Bay	1998	8.3	0.0	0.0	0.0	8.3
Elfin Cove	1987	0.0		0.0	0.0	0.0
Game Creek	1996	0.0	0.0	0.0	0.0	0.0
Gustavus	1987	14.1		0.0	0.0	14.1
Haines	1983	27.2	49.7	12.9	6.1	15.7
Haines	1987	45.4		3.7	3.5	42.3
Haines	1996	66.7	12.9	7.5	10.8	59.1
Haines	2012	55.3	25.8	8.3	8.3	48.5
Hollis	1987	6.0		0.0	0.0	6.0
Hollis	1998	8.7	4.3	4.3	4.3	8.7
Hoonah	1985	7.0	4.2	2.8		
Hoonah	1987	19.3		0.0	0.0	19.3
Hoonah	1996	15.6	6.5	3.9	3.9	11.7
Hoonah	2012	16.4	2.5	0.0	3.3	16.4
Hoonah	2016	16.9	4.6	1.5	4.6	15.4
Hydaburg	1987	6.0		0.0	0.0	6.0
Hydaburg	1997	3.9	0.0	0.0	3.9	3.9
Hydaburg	2012	4.2	0.0	0.0	2.1	4.2
Hyder	1987	33.3		6.1	0.0	27.3
Kake	1985	0.0	0.0	0.0		
Kake	1987	0.8		0.0	0.0	0.8
Kake	1996	4.1	5.5	1.4	0.0	2.7
Kasaan	1987	7.1		0.0	0.0	7.1



Community	Study year	% Households using moose	% Households attempting to harvest moose	% Households harvesting moose	% Households giving away moose	% Households receiving moose
Kasaan	1998	7.1	0.0	0.0	7.1	7.1
Klawock	1984	2.8	0.0	0.0	0.0	2.8
Klawock	1987	3.3		1.1	0.0	2.2
Klawock	1997	6.6	2.8	2.8	2.8	4.7
Klukwan	1983	24.2	57.6	9.1	6.1	15.2
Klukwan	1987	30.4		0.0	2.5	30.4
Klukwan	1996	64.5	19.4	6.5	6.5	61.3
Metlakatla	1987	4.0		0.0	0.0	4.0
Meyers Chuck	1987	10.0		10.0	10.0	0.0
Naukati Bay	1998	26.0	0.0	0.0	6.0	26.0
Pelican	1987	15.9		4.0	4.0	13.1
Petersburg	1987	27.4		8.4	7.3	22.1
Petersburg	2000	25.6	16.8	1.6	1.6	24.8
Point Baker	1987	5.3		0.0	0.0	5.3
Point Baker	1996	0.0	12.5	0.0	0.0	0.0
Port Alexander	1987	0.0		0.0	0.0	0.0
Port Protection	1987	28.0		0.0	0.0	28.0
Port Protection	1996	8.0	8.0	0.0	0.0	8.0
Saxman	1987	21.3		3.3	3.3	17.9
Saxman	1999	8.2	1.4	0.0	0.0	8.2
Sitka	1987	0.3		0.3	0.0	0.0
Sitka	1996	12.3	4.5	2.8	4.1	9.8
Sitka	2013	11.9	1.7	0.0	0.9	11.9
Skagway	1987	14.5		0.0	0.0	14.5
Tenakee Springs	1984	16.7	0.0	0.0	0.0	16.7
Tenakee Springs	1987	9.7		0.0	0.0	9.7
Thorne Bay	1987	13.4		1.1	0.0	13.4
Thorne Bay	1998	9.0	3.4	0.0	1.1	9.0
Whale Pass	1987	11.1		5.6	0.0	5.6
Whale Pass	1998	0.0	0.0	0.0	0.0	0.0
Whale Pass	2012	0.0	9.5	0.0	0.0	0.0
Whitestone Camp	1996	0.0	0.0	0.0	0.0	0.0
Wrangell	1987	42.5		6.3	6.2	37.7
Wrangell	2000	31.6	17.3	6.1	9.2	25.5
Yakutat	1984	70.0	62.0	22.0	22.0	62.0
Yakutat	1987	53.9		12.7	16.3	43.5
Yakutat	2000	77.0	39.6	17.3	30.2	64.7
Yakutat	2015	75.2	48.5	19.8	31.7	64.4

<b>WP20–16/17 Executive Summary</b>	
<b>General Description</b>	<p>Wildlife Proposal WP20-16 requests extending the sealing period for wolf trapping and removing language referencing a combined Federal-State harvest quota for wolves in Unit 2. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i></p> <p>Wildlife Proposal WP20-17 requests extending the sealing period for wolf hunting, changing the hunting harvest limit to “no limit,” and removing language referencing a combined Federal-State harvest quota for wolves in Unit 2. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i></p>
<b>Proposed Regulation</b>	<p><u>WP20-16</u></p> <p style="text-align: center;"><b>Unit 2 –Wolf Trapping</b></p> <p><i>No limit. <span style="float: right;">Nov. 15- Mar. 31.</span></i></p> <p><del><i>Federal hunting and trapping season may be closed when the combined Federal State harvest quota is reached.</i></del>  <i>Any wolf taken in Unit 2 must be sealed within <del>14 days of harvest</del> <b>30 days of the end of the season.</b></i></p> <p><u>WP20-17</u></p> <p style="text-align: center;"><b>Unit 2 –Wolf Hunting</b></p> <p><del><i>5 wolves</i></del> <i>No limit. <span style="float: right;">Sep. 1- Mar. 31.</span></i></p> <p><del><i>Federal hunting and trapping season may be closed when the combined Federal State harvest quota is reached.</i></del>  <i>Any wolf taken in Unit 2 must be sealed within <del>14 days of harvest</del> <b>30 days of the end of the season.</b></i></p>
<b>OSM Preliminary Conclusion</b>	<b>Support</b> Proposal WP20-16 and Proposal WP20-17.

<b>WP20–16/17 Executive Summary</b>	
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>Bristol Bay Subsistence Regional Advisory Council Recommendation</b>	
<b>Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation</b>	
<b>Northwest Arctic Subsistence Regional Advisory Council Recommendation</b>	
<b>Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation</b>	
<b>North Slope Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	
<b>Written Public Comments</b>	<b>1 oppose</b>

**DRAFT STAFF ANALYSIS  
WP20-16/17**

**ISSUES**

Wildlife Proposal WP20-16, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests extending the sealing period for wolf trapping and removing language referencing a combined Federal-State harvest quota for wolves in Unit 2.

Wildlife Proposal WP20-17, also submitted by the Council, requests extending the sealing period for wolf hunting, changing the hunting harvest limit to “no limit,” and removing language referencing a combined Federal-State harvest quota for wolves in Unit 2.

**DISCUSSION**

The Alaska Board of Game (BOG) recently adopted a new harvest management strategy for wolves in Unit 2, resulting in misalignment of State and Federal regulations. The proponent states that their intent is to align State and Federal regulations, to implement the new harvest management strategy under Federal regulations, and to increase harvest opportunity. The proponent also states no conservation concerns or any effects on other uses are expected from adoption of these proposals.

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**

*5 wolves.*

*Sep. 1-Mar. 31.*

*Federal hunting and trapping season may be closed when the combined Federal-State harvest quota is reached. Any wolf taken in Unit 2 must be sealed within 14 days of harvest*

**Unit 2 –Wolf Trapping**

*No limit.*

*Nov. 15-Mar. 31.*

*Federal hunting and trapping season may be closed when the combined Federal-State harvest quota is reached. Any wolf taken in Unit 2 must be sealed within 14 days of harvest*

## Proposed Federal Regulation

### WP20-16

#### **Unit 2 –Wolf Trapping**

*No limit.*

*Nov. 15-Mar. 31.*

*~~Federal hunting and trapping season may be closed when the combined Federal State harvest quota is reached.~~ Any wolf taken in Unit 2 must be sealed within ~~14 days of harvest~~ **30 days of the end of the season.***

### WP20-17

#### **Unit 2 –Wolf Hunting**

*~~5-wolves~~ No limit.*

*Sep. 1-Mar. 31.*

*~~Federal hunting and trapping season may be closed when the combined Federal State harvest quota is reached.~~ Any wolf taken in Unit 2 must be sealed within ~~14 days of harvest~~ **30 days of the end of the season.***

## Existing State Regulation

#### **Unit 2–Wolf Hunting**

*Residents and Non-residents—5 wolves*

*Dec. 1-Mar. 31*

*Hides must be sealed within 30 days of kill.*

#### **Unit 2–Wolf Trapping**

*Residents and Non-residents—No limit.*

*Nov. 15-Mar. 31*

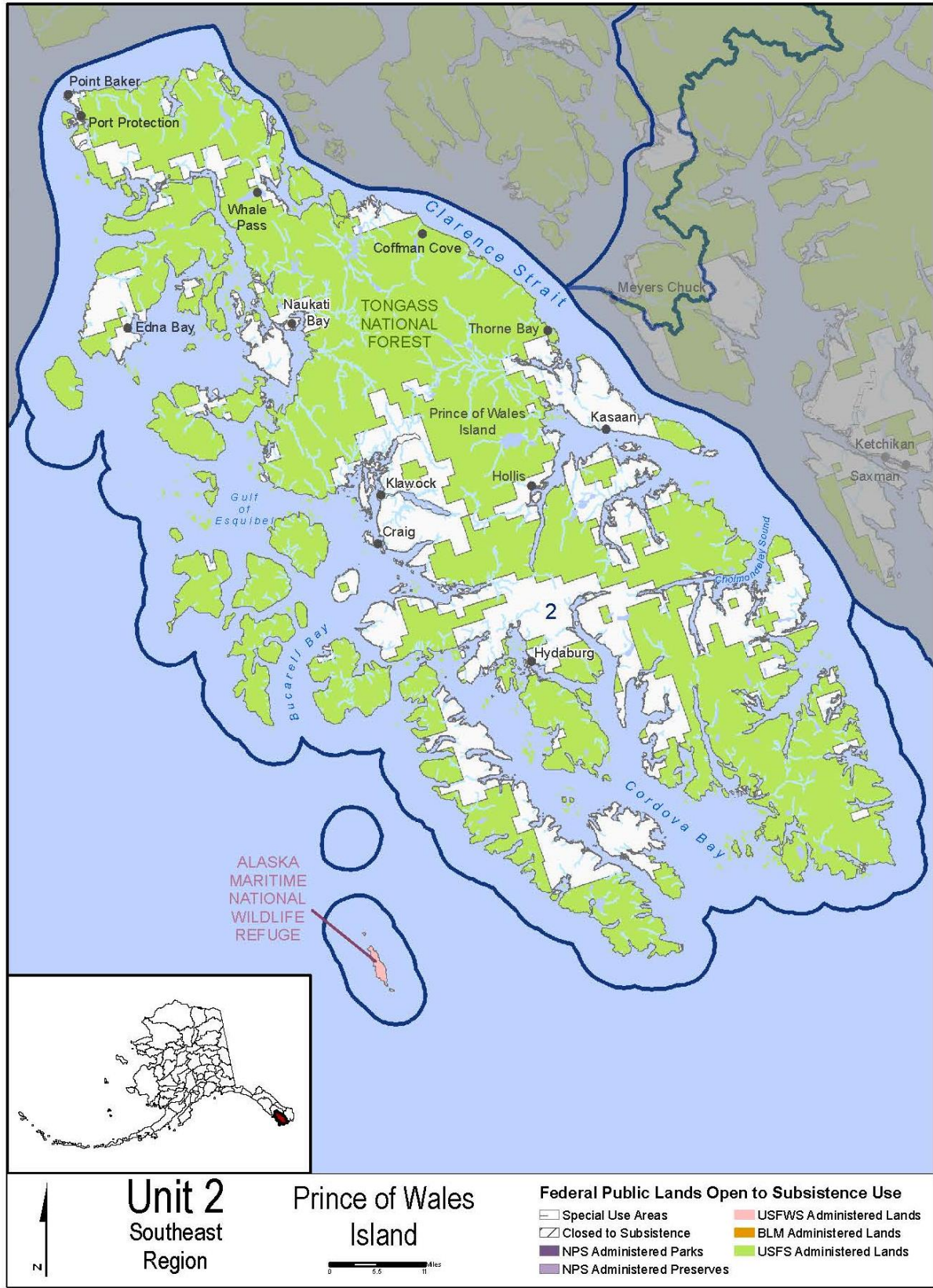
*Hides must be sealed within 30 days after the close of the season.*

## Extent of Federal Public Lands

Unit 2 is comprised of 71.7% Federal public lands and consists of 71.6% USDA Forest Service (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 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 had 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 U.S. Fish and Wildlife Service (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 350, 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, the Alaska Department of Fish and Game (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 Sept. 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 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 that wolves must have the radius and ulna of the left foreleg naturally attached to the hide until sealing.

In 2010, the BOG and the Board 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, but noted 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 Council (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 ACs 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.

**Table 1.** Management data for Unit 2 wolves using the Harvest Guideline Level (HGL) management strategy (Schumacher 2019, pers. comm.).

Regulatory Year	Population Estimate*	Harvest Guideline level (HGL %)	Harvest Quota	Reported Harvest	Date closed by State Emergency Order (EO)
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**

\* Population estimates from 1997-2013 were assumed estimates based on harvest levels and a 1994 population estimate. Population estimates from 2014-2018 are from DNA-based spatially explicit capture-recapture studies (see Biological Background section).

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

### Current Events

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. The proposed changes mirror the requests of Proposals WP20-16/17 with the exception of changing the hunting harvest limit to “no limit.” 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.

## 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). 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. 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 the state (Porter 2018). Indeed, USFWS (2015) notes that even the low, 2014 wolf density estimates for Unit 2 (9.9 wolves/1,000 km<sup>2</sup>) are not particularly low by most standards for Northern wolf populations (Fuller et al. 2003).

State management objectives for Unit 2 wolves include (Note: State objectives were updated in 2019 after the BOG adopted Proposal 43, and are not currently published in any ADF&G management reports) (Schumacher 2019, pers. comm.):

- 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, and 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 to estimate 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 provide a population index.

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 with barbed wire to obtain hair samples that can be sent to a lab for DNA analysis. Samples are collected from mid-October through December and lab results are usually received 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).

Between 2013 and 2018, Unit 2 wolf population estimates have ranged from 89-231 wolves (**Table 1, Figure 1**) (Schumacher 2019, pers. comm.). While the point estimates for the first two years differ drastically, statistically, no difference exists between the two estimates due to overlapping confidence intervals. 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. 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).

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, and 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 roaded portions of Unit 2 where harvest is higher, so human-caused mortality rates may be somewhat inflated (USFWS 2015).

Wolves are remarkably resilient to high levels of harvest and human activities due to their high potential annual productivity and long dispersal abilities (USFWS 2015, Weaver et al. 1996). 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 Regional Wildlife Supervisor for Southeast Alaska, ADF&G stated that other wolf research and the scientific literature indicate that a healthy wolf population can sustain 30% annual mortality (SERAC 2017). Additionally, wolf harvest records indicate neither offering a cash bounty nor poisoning wolves during the early 20<sup>th</sup> century had any lasting effects on wolf abundance or distribution on Southeast Alaska islands (Porter 2018).

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

### New Harvest Management Strategy

Unit 2 is a good place to implement population objectives because there is very little dispersal into and out of the unit (ADF&G 2019d). The new wolf management strategy consists of four zones (**Figure 2**). Zone 1 sets the minimum wolf population threshold at 100 wolves and seasons would remain closed until the wolf population recovers. Zone 2 is the conservation zone where the wolf population is estimated between 100-149 wolves, and seasons of up to six weeks provide limited harvest opportunity and a buffer to recover the population before it declines into Zone 1. Zone 3 sets the population objective range at 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 would be 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 was in Zone 1, an additional trapping season would occur prior to managers learning 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, which is the opening date for Federal and State trapping seasons (Schumacher 2019, pers. comm.).

Setting these population objectives incorporated 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). They also included traditional knowledge. The Craig Tribal Association testified that the USFS determined 150-200 wolves as 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 to have 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.

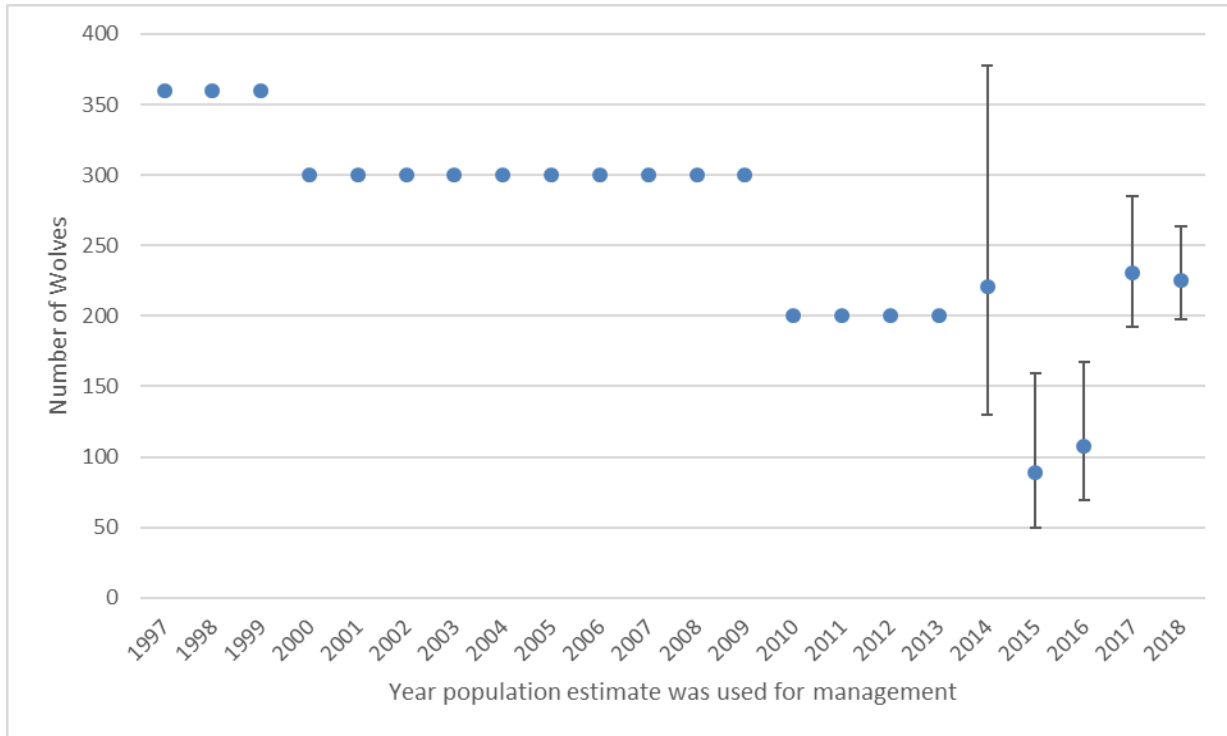
The presence of wolves in an area is closely linked with prey availability (USFWS 2015). While Unit 2 wolves feed on a variety of species including beavers and salmon, deer are their primary prey (USFWS 2015, Porter 2018). Both the comprehensive conservation assessment (Person et al. 1996) and the species 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).

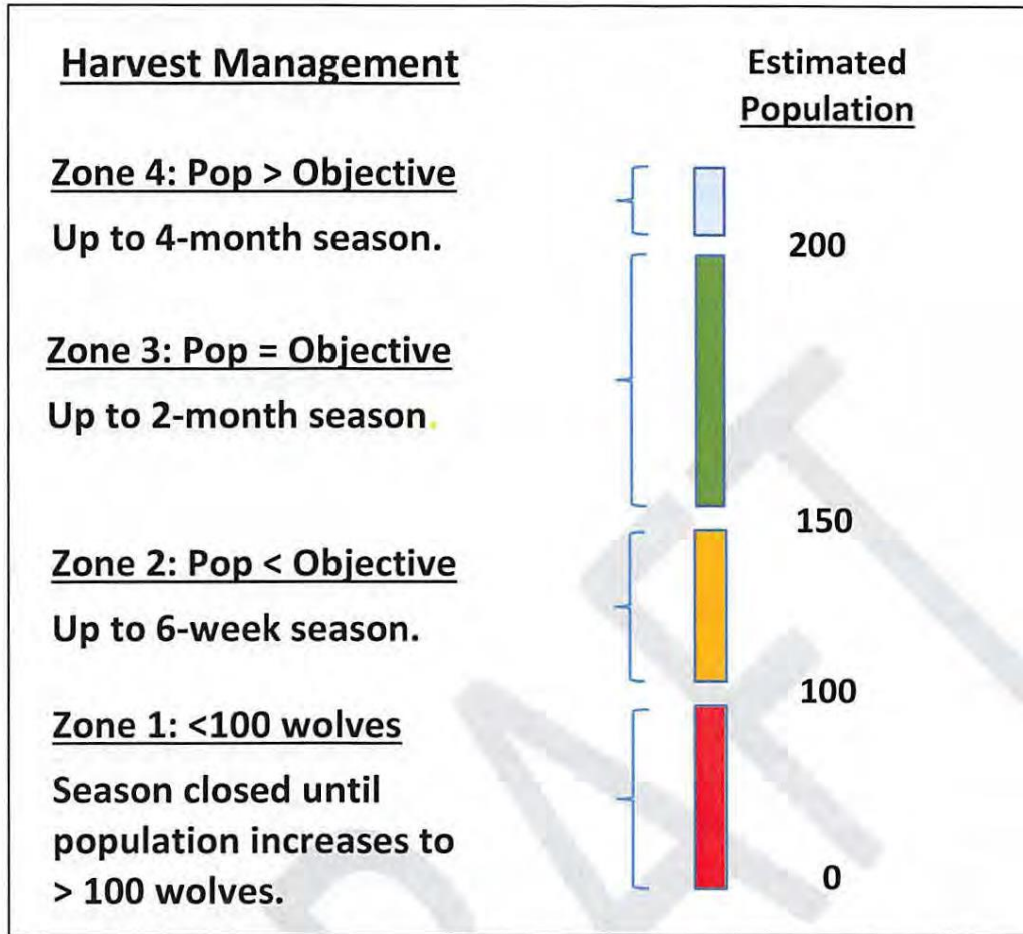
Deer are primarily limited by habitat rather than by predation (SERAC 2017, USFWS 2015). In Unit 2, deer habitat is adversely affected by industrial-scale logging of old-growth forests, which has occurred in the unit since the 1950s and peaked in the 1980s (USFWS 2015). Clearcut logging has been the 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, clearcuts 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 clearcuts provide deer with lower-quality forage, and regenerating trees shade out the understory vegetation after 20-35 years (Porter 2018, USFWS 2015). As Unit 2 timber harvest peaked in the 1980s, many stands are entering the successional stage that is very poor deer habitat (USFWS 2015).

In addition to altering the habitat of their primary prey species, logging also impacts Unit 2 wolves by constructing roads that provide relatively easy access for hunters and trappers into previously remote areas (Porter 2018, USFWS 2015). Person and Russell (2008) found roads clearly increased risk of death for POW wolves from hunting and trapping and contributed to unsustainable harvest rates. They also determined road density to be an important predictor of harvest up to 0.9 km of road per square kilometer (km/km<sup>2</sup>). Above this threshold, increased road density did not correspond to increased harvest rates. Mean road density in Unit 2 is 0.62 km/km<sup>2</sup>, ranging from 0-1.57 km/km<sup>2</sup> (Albert 2015 as cited in USFWS 2015). Person and Logan (2012) believe harvest from the densely roaded northcentral and central portions of POW are 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, 1997-2018. Estimates from 1997-2013 are assumed from sealing records and a 1994 population estimate. Estimates from 2014-2018 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.).



**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 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).

Wolves also occupy an important symbolic role in both Tlingit and Haida cultures. 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). These relationships are similar within the Haida culture, although the wolf is claimed by the Raven rather than the Eagle moiety (Blackman 1998).

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). 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., 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., 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.). (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 per trapper ranged from 1.8-5.5 wolves per trapper, averaging 3.4 wolves per trapper (Schumacher 2019, pers. comm., Porter 2018, Porter 2003). However, in most years, just 2-3 skilled trappers harvest most of the wolves (Schumacher 2019, pers. comm.). Between 1996 and 1998, ADF&G conducted household harvest surveys in all POW communities (ADF&G 2019e). The larger communities of Klawock and Craig accounted for 80% of the POW wolf harvest, and <.05% of the POW population 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.). 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.). In Unit 2, wolves can be harvested with a firearm under a trapping license under both State and Federal regulations.

Since 1997 when the HGL was initiated (see Regulatory History), annual reported wolf harvest has ranged from 7-96 wolves, averaging 50 wolves (**Figure 3**) (Schumacher 2019, pers. comm.). 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., Porter 2018, Bethune 2012).

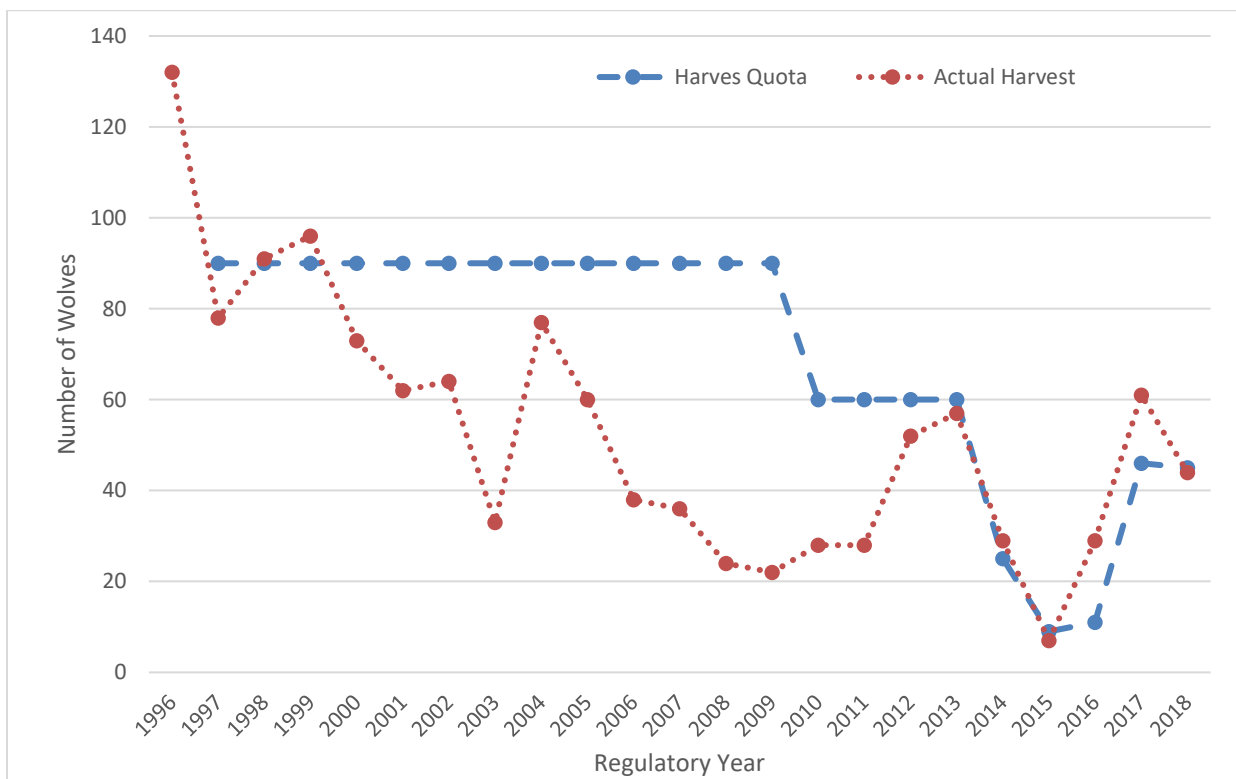
Most of the wolf harvest in Unit 2 occurs in January and February when pelts are most prime and fur prices are highest (Porter 2018). Since 2015, most of the wolf harvest has occurred in December because seasons have closed early by emergency order (ADF&G 2019c). Little harvest occurs before December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

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.). 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.

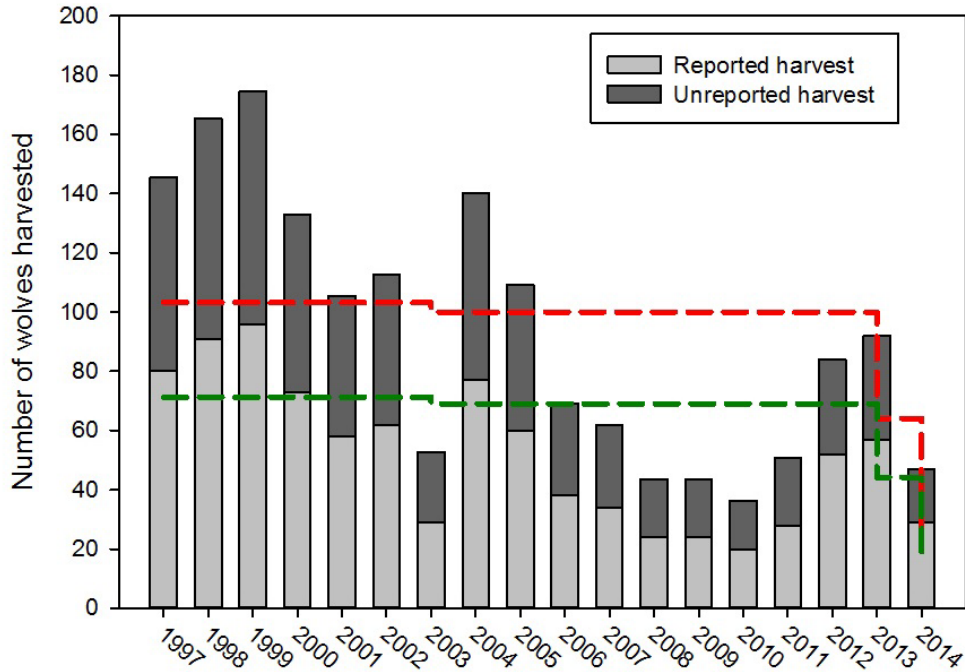
USFWS (2015) notes harvest may explain most of the 2013-2014 population decline if unreported harvest is considered. Relatively easy boat and road access may contribute to high rates of unreported harvest in Unit 2, while the insularity of the population makes it more susceptible to overharvest (USFWS 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 is 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 trappers per year (Porter 2018). The threat of early season closures likely discourages 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). Prior to the public meeting for WSA19-02, a wolf trapper from POW mentioned he would wait until the 14<sup>th</sup> day to seal his wolf pelts in an effort to extend the wolf season.



**Figure 3.** Unit 2 wolf harvest and harvest quotas, 1996-2018. Harvest includes reported harvest and other documented human-caused mortality (e.g. vehicle collisions) (Schumacher 2018, pers. comm., Porter 2018).



**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% HGL, respectively (figure from USFWS 2015).

**Effects of the Proposal**

If the Board adopts Proposals WP20-16/17, the sealing requirement will be extended to 30 days after the end of the season, the combined Federal-State harvest quota will be eliminated, and the hunting harvest will become “no limit.” Extending the sealing requirement will align with the new sealing requirement for the State trapping season, but does not align with the State hunting season. Also, subsistence users will be able to seal all of their wolf pelts at once rather than sealing them piece meal throughout the season. Extending the sealing requirement should have no effect on wolf harvest or abundance since the new management strategy depends on population objectives rather than on in-season harvest tracking (ADF&G 2019d).

Changing the hunting harvest limit to “no limit,” increases harvest opportunity for Federally qualified subsistence users, but will likely have little effect on harvest and the wolf population. Most trappers in Unit 2 average less than 5 wolves per year, and only 2-3 skilled trappers typically account for most of the Unit 2 wolf harvest (Schumacher 2019, pers. comm., Porter 2018, 2003). Additionally, few wolves in Unit 2 are taken under a hunting license and an unlimited number of wolves can already be harvested with a firearm under a trapping license. Therefore, the increased harvest opportunity would occur Sept. 1-Nov. 14 as the trapping season opens on November 15. While wolf pelts have been reported to prime early in Unit 2 (OSM 2003), the quality of a pelt harvested in September is questionable, although shorter fur is sometimes preferred for skin sewing. As the Southeast Council did not provide specific

justification for why the increased hunting harvest limit was necessary in their proposal, OSM hopes the Council will provide justification on the record at their fall 2019 meeting.

An issue identified with the HGL management strategy was that it focused only on the percentage of wolves to harvest and not on how many wolves should be in the population. Without population objectives, State and Federal managers had to decide when the population was too low or too high, whereas population objectives determined through a public process such as BOG proposals clarifies goals, providing guidance to managers and building buy-in among stakeholders (SERAC 2019, ADF&G 2019b, 2019d). Specifically, establishing population objectives provides managers with a quantitative benchmark to gauge successful management, helps guide habitat management and regulatory planning, and mitigates disagreements between stakeholders over what is a sustainable wolf population (Wolf Technical Committee 2017, ADF&G 2019d).

Additionally, the HGL management strategy discouraged hunters and trappers from reporting harvest to prevent the season from closing early. Early season closures also created hardships for trappers who could not plan for when they needed to pull traps. In 2018, the wolf season closed by emergency order on December 18, but was reopened until December 21 due to bad weather that prevented trappers from pulling their traps. Managing for a population objective and announcing season lengths ahead of time provides predictability, allowing trappers to plan and prepare for the season and, importantly, does not discourage reporting harvests (ADF&G 2019d). The new wolf management strategy further alleviates concerns about illegal or unreported harvests by basing management on population estimates and objectives rather than on harvest quotas (SERAC 2019).

While the new management strategy depends on year-old population estimates to determine season lengths, the HGL management strategy depended on year-old population data to announce harvest quotas (since 2014). Although the SECR population estimates may only be produced every 2-4 years at some point in the future, ADF&G may employ other monitoring techniques to assess the Unit 2 wolf population. These techniques include trail cameras to document wolf reproduction and relative abundance, and measuring the foreleg bones of harvested wolves to monitor age structure and recruitment (ADF&G 2019b).

One of the reasons a species can be listed under the ESA is inadequacy of existing regulatory mechanisms. In response to the 2011 ESA listing petition, USFWS (2016) found wolf harvest regulations in Unit 2 to be inadequate to avoid exceeding sustainable harvests (although their inadequacy would not impact the rangewide population). In 2016 and 2017, actual harvest well exceeded the harvest quota, suggesting that the HGL management strategy does not work (SERAC 2017) and reaffirming USFWS' (2016) assessment of inadequate regulations. Even the relatively short sealing requirement resulted in a two week time lag, making it difficult to monitor harvest and to project when quotas would be met (SERAC 2017, 2018). Establishing population objectives through a public process reduces the likelihood of future litigation (Wolf Technical Committee 2017).

The Southeast Regional Supervisor of the Wildlife Division of ADF&G stated at the fall 2017 Council meeting, "Monitoring harvest using sealing records didn't work, so what's a better idea?" (SERAC 2017, p. 189). Council members stated establishing population goals would constitute "something better" (p.

249) and encouraged State and Federal staff to work toward setting population goals for Unit 2 wolves, “so that we’re not bouncing around endlessly on is it 20% [or] is it 30%?” (SERAC 2017, p. 442).

While managing harvest through season length may initially result in more or less wolves harvested than expected, State and Federal managers can fine tune season lengths over time once patterns between season length and harvest are better established (SERAC 2019). Past experiences indicate mixed results when using season length as a means for limiting harvest. After the BOG shortened State trapping and hunting seasons in 1997, wolf harvest declined by 12% (Porter 2003). However, since 1997, wolf harvest has varied considerably in years not closed by emergency order (22-96 wolves per year), although State seasons have not changed. Every season since 2013 has been closed by emergency order, and harvest in these years has also varied considerably (7-61 wolves per year). In 2015, seven wolves were harvested during a five week Federal and three week State season. In 2017, 61 wolves were harvested during a 4.5 week Federal and 2.5 week State season (**Table 1**). This suggests harvest is more a function of abundance rather than season length. Additionally, wolves exhibit high resiliency to human harvest and population declines as evidenced by their population rebound under conservative management since 2014 and high reproductive potential (SERAC 2017, USFWS 2015).

The Federal in-season manager (Craig District Ranger) currently has delegated authority to close, reopen, or adjust the Federal hunting and trapping seasons for wolves in Unit 2. Previously, the Federal in-season manager decided when to close the season based on harvest quotas. If this request is approved, this individual would determine season lengths in cooperation with State managers based on the new harvest management strategy, although maintains the flexibility to close/re-open/adjust Federal seasons at his/her discretion. However, the State will not announce its season length until fall 2019 after the 2018 population estimate is available. While the Federal hunting season opens three months earlier than the State hunting season, the proponent’s intent was to maintain the Sept. 1 opening date regardless of the new management strategy to provide subsistence opportunity for wolf harvest while deer hunting.

## **OSM PRELIMINARY CONCLUSION**

**Support** Proposal WP20-16 and Proposal WP20-17.

### **Justification**

Effective wolf management in Unit 2 depends upon coordination between State and Federal regulations, in-season managers, and users. Adopting these proposals aligns Federal and State wolf management strategies, facilitating management and reducing user confusion. Eliminating the combined State-Federal harvest quota under Federal regulations clarifies in-season management as the State no longer uses harvest quotas. Extending the sealing requirement decreases the regulatory burden on Federally qualified subsistence users and aligns Federal hunting and trapping sealing requirements with State trapping requirements, reducing regulatory complexity. Increasing the hunting harvest limit provides additional harvest opportunity to Federally qualified subsistence users and should have little impact on the wolf population as few wolves are harvested before the trapping season opens.

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**WRITTEN PUBLIC COMMENTS**

June 25, 2019

TO: Federal Board of Subsistence Management, (Att:  
Theo Mutschowitz)  
FROM: Alaskans FOR Wildlife and any Cooperating  
Entities  
RE: Comments on Subsistence Proposals

Please consider these comments on numbered proposals. Comments are offered from a public perspective that reflects several major considerations which we earnestly wish you and the board to keep clearly in mind as you make decisions on these and all proposals offered, namely,

- 1) The lands in question are publically owned lands belonging to all US citizens who in theory and in law all have interest in how wildlife on these lands are managed, and
- 2) Article 8 of our Alaska Constitution clearly sets forth that ALL (emphasis) Alaskans are stakeholders, all essentially owners, with respect to its natural resources and how they are managed .

WP-20 Wolf Trapping lifting harvest restrictions and extending sealing time.

OPPOSE

-2-

This proposal leads to spreading unrestricted wolf take everywhere. Given especially the substantial science on the value of apex predators plus the high interest in sustaining wolf populations on American public lands including here in Alaska as essential to maintenance of ecosystem biodiversity, we maintain that enactment of this proposal would result in another chapter in the unscientific overall continued war on wolves. This proposal to lift harvest limits and to extend sealing limits also already excessive in length are not scientifically justified nor justified as a public matter given the overall value of wolves to maintenance of biodiversity. It must not pass.

WP20-17 – Removing harvest quotas and sealing requirements for hunting wolves, OPPOSE.

We oppose this proposal for the same reasons offered to oppose the previous proposal, WP20-16.

The values of wolves as apex predator and its place in American culture must have bearing upon this consideration. No science and no national or even Alaskan public cultural norms can possibly support this permissively reckless proposal to expand wolf take without bounds. It must not pass.

-3-

WP20-26 Permitting the use of snowmachines to “position” wildlife for harvest. OPPOSE

This proposal would expand this practice apparently from other land management units. In essence “positioning” is another term for what in reality will result in chasing, and harassing wildlife to exhaustion, prohibitions in the regulation notwithstanding, due to impossible enforcement limitations. As an example, when asked to explain existing regulations for snowmachine use in trapping and hunting, an Alaska wildlife trooper explained he does not even understand the regulation.

Expanded snowmachine use, “positioning,” will amount to a continued enforcement challenge. Widespread abuse will surely result and will continue to give subsistence the reputation of abuse when it really needs public support: we feel that as we now face mass extinctions of wildlife species; there is new public and growing focus on the crisis. This is an extremely unwise plunge to the bottom and we caution a futuristic consideration.

WP20-08 Proposal to require traps and snares to be marked with name and state identification number.

-4-

SUPPORT This proposal is topical, even in urban municipalities of Alaska as conflicts in public use areas resulting in injuries to hikers, pets and other outdoor public land users rise .

Keeping in mind even the use of more remote public lands grows as outdoor users of their lands increase, the potential for conflicts including serious injuries resulting from hidden owner-unidentified traps will increase. Organized trappers have strongly opposed such requirements as proposed here in past requests for change considered by the Alaska Board of Game. We witness the public land users (including of federal lands) would most certainly strongly favor this accountability. We strongly favor this proposal.

In closing, please carefully consider these comments as you go forward with the process over the next year or so. WE thank you for your consideration of these comments.

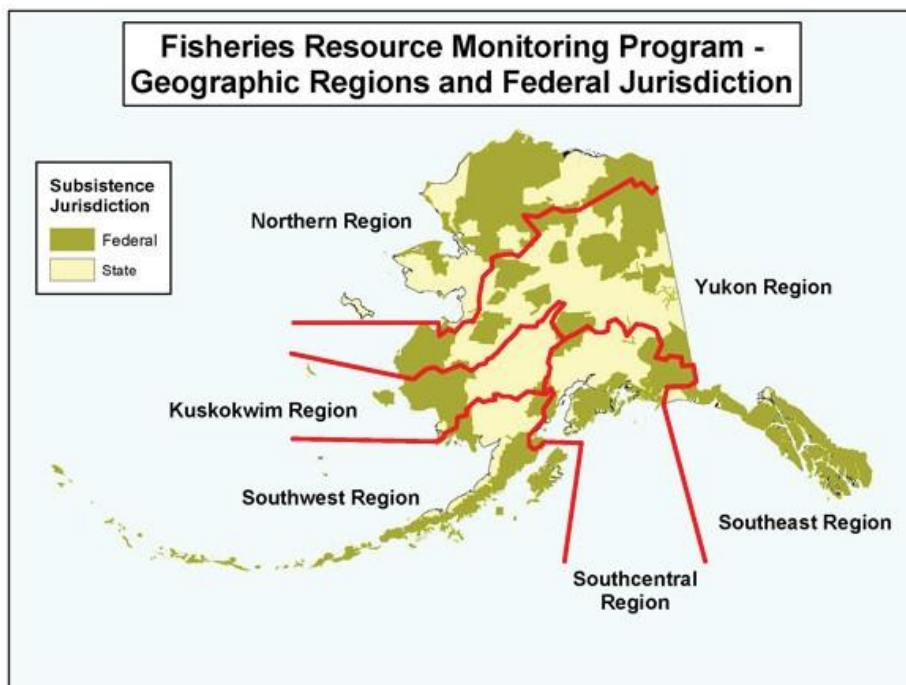
Sincerely,  
Jim Kowalsky,  
Chair, Alaskans FOR Wildlife  
PO Box 81957  
Fairbanks, Alaska 99708  
907-488-2434

## FISHERIES RESOURCE MONITORING PROGRAM

### BACKGROUND

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

Every two years, the Office of Subsistence Management announces a funding opportunity for investigation plans addressing subsistence fisheries on Federal public lands. The 2020 Notice of Funding Opportunity focused on priority information needs developed by the Subsistence Regional Advisory Councils with input from strategic plans and subject matter specialists. The Monitoring Program is administered through regions to align with stock, harvest, and community issues common to a geographic area. The six Monitoring Program regions are shown below.



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

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

Project executive summaries are assembled into a draft 2020 Fisheries Resources Monitoring Plan. The draft plan is distributed for public review and comment through Subsistence Regional Advisory Council meetings, beginning in September 2019. The Federal Subsistence Board will review the draft plan and will accept written and oral comments at its January 2020 meeting. The Federal Subsistence Board forwards its comments to the Assistant Regional Director of the Office of Subsistence Management. Final funding approval lies with the Assistant Regional Director of the Office of Subsistence Management. Investigators are subsequently notified in writing of the status of their proposals.

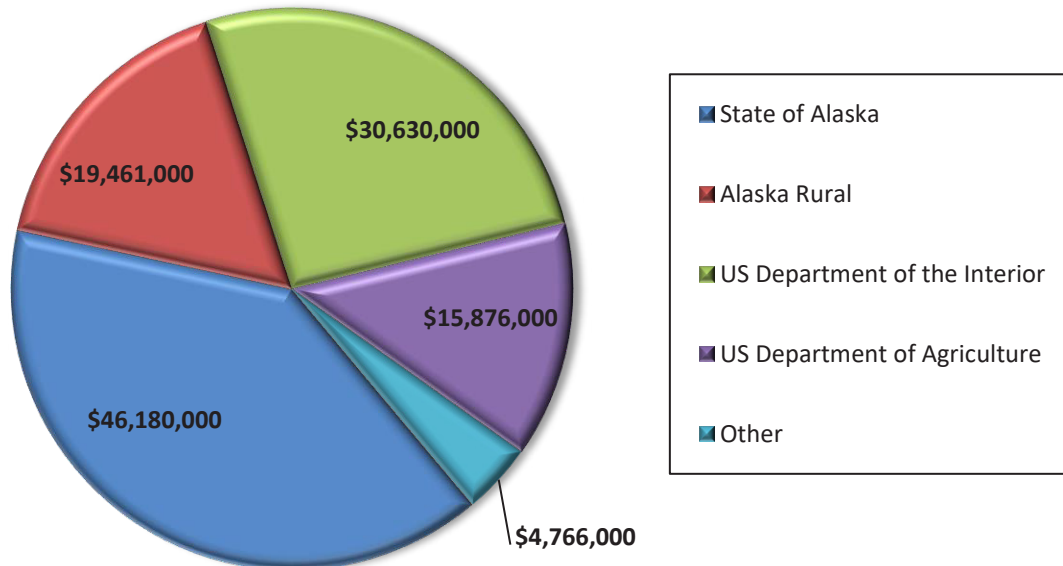
## **HISTORICAL OVERVIEW**

The Monitoring Program was first implemented in 2000 with an initial allocation of \$5 million. Since 2000, a total of \$117 million has been allocated for the Monitoring Program to fund a total of 452 projects (**Figure 1** and **Figure 2**).

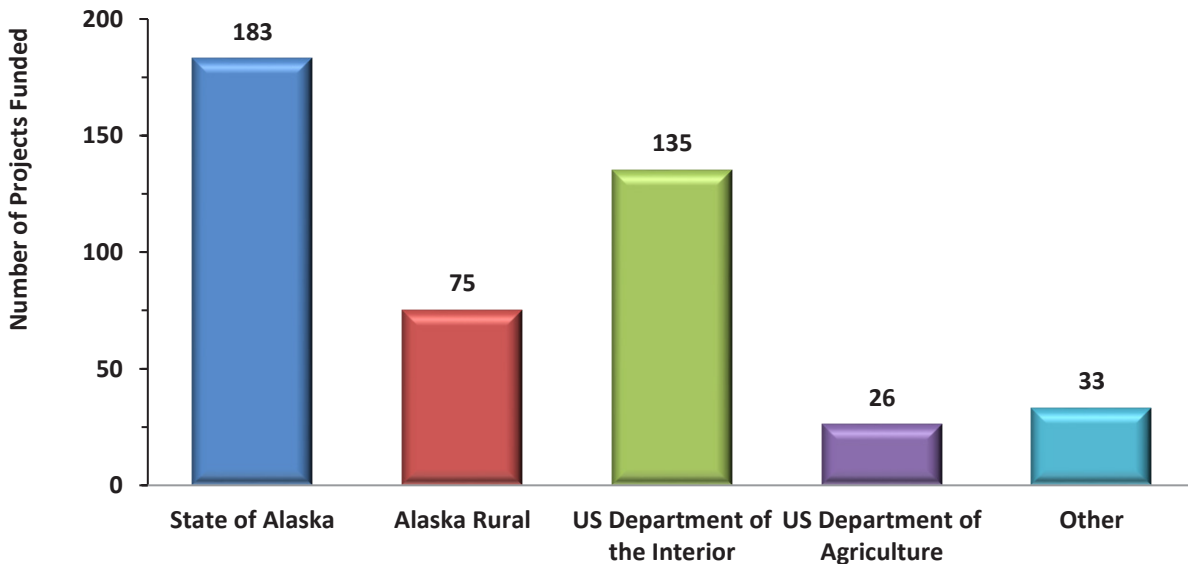
During each two-year funding cycle, the Monitoring Program budget funds ongoing multi-year projects (2, 3, or 4 years) as well as new projects. Budget guidelines are established by geographic region (**Table 1**). The regional guidelines were developed using six criteria that included level of risk to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



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



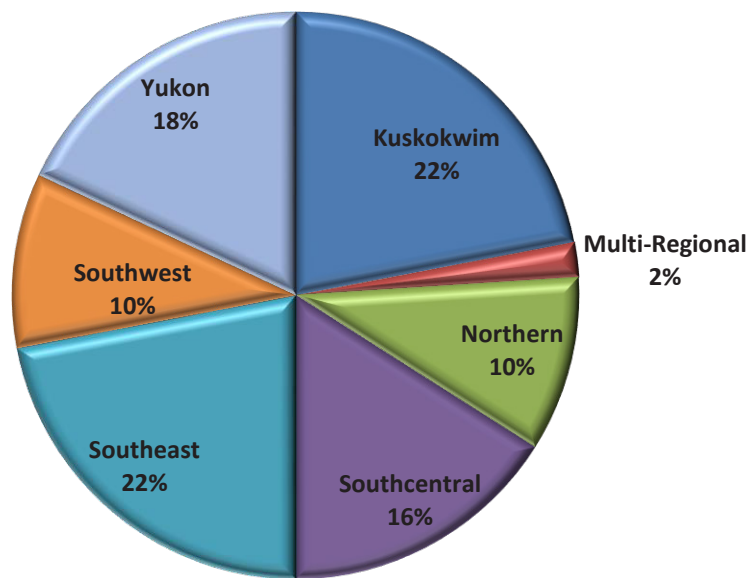
**Figure 2. Number of Monitoring Program Projects Funded, by Organization Type, since 2000**



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

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

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



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

**Harvest monitoring** studies provide information on numbers and species of fish harvested, locations of harvests, and gear types used. Methods used to gather information on subsistence harvest patterns may

include harvest calendars, mail-in questionnaires, household interviews, subsistence permit reports, and telephone interviews.

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

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

## **PROJECT EVALUATION PROCESS**

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

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

1. **Strategic Priorities**—Studies should be responsive to information needs identified in the 2020 Priority Information Needs available at the Monitoring Program webpage at <https://www.doi.gov/subsistence/frmp/funding>. All projects must have a direct linkage to Federal public lands and/or waters to be eligible for funding under the Monitoring Program. To assist in evaluation of submittals for projects previously funded under the Monitoring Program, investigators must summarize project findings in their investigation plans. This summary should clearly and concisely document project performance, key findings, and uses of collected information for Federal subsistence management. Projects should address the following topics to demonstrate links to strategic priorities:

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

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

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

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

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

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

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

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

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

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

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

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

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

## **POLICY AND FUNDING GUIDELINES**

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

- Projects of up to four years in duration may be considered
- Proposals requesting Monitoring Program funding that exceeds \$215,000.00 in any one year are not eligible for funding
- Studies must not duplicate existing projects
- Long term projects will be considered on a case by case basis

Activities that are not eligible for funding include:

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

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

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

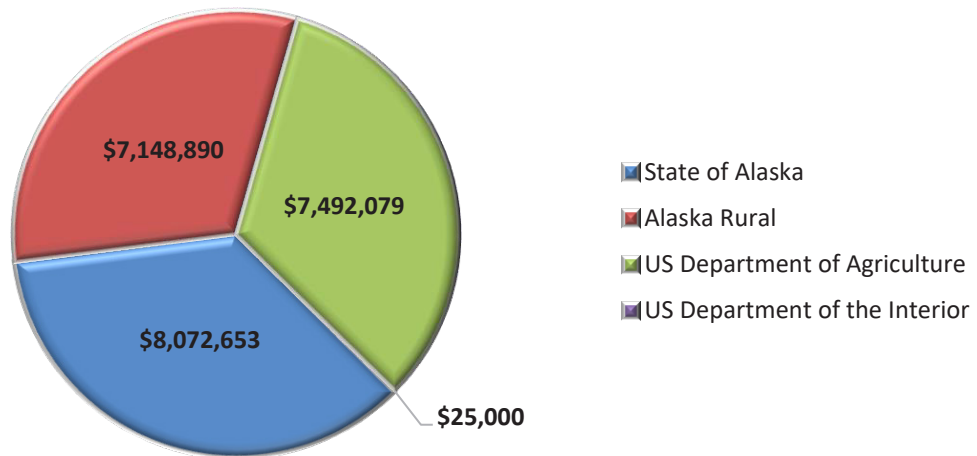
## **2020 FISHERIES RESOURCE MONITORING PLAN**

For 2020, a total of 28 investigation plans were received and all are considered eligible for funding. For 2020, the Department of the Interior, through the U.S. Fish and Wildlife Service, will provide an anticipated \$1.5 million in funding statewide for new projects. The U.S. Department of Agriculture, through the U.S. Forest Service, has historically provided some funding. The amount of U.S. Department of Agriculture funding available for 2020 projects is uncertain.

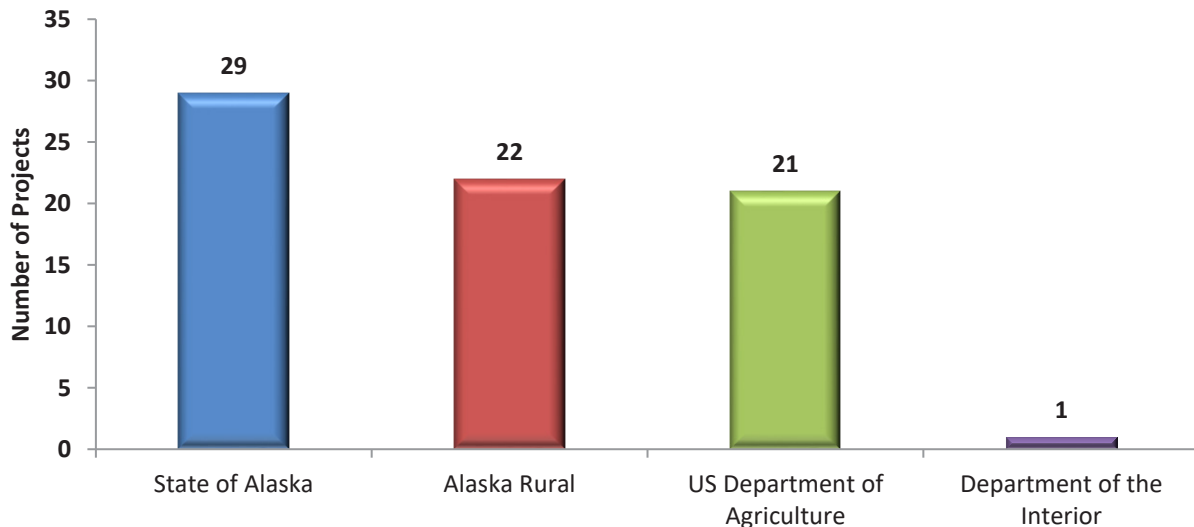
## FISHERIES RESOURCE MONITORING PROGRAM SOUTHEAST ALASKA REGION OVERVIEW

Since the inception of the Monitoring Program in 2000, 73 projects have been undertaken in the Southeast Alaska Region costing \$22.7 million (**Figure 1**). Of these, the State of Alaska received funds to conduct 29 projects, Alaska rural organizations conducted 22 projects, the U.S. Department of Agriculture conducted 21 projects, and the Department of the Interior conducted one project (**Figure 2**). See **Appendix 1** for more information on Southeast Alaska Region projects completed since 2000.

**Figure 1. Monitoring Program Funds Distributed, by Organization Type, in the Southeast Alaska Region since 2000**



**Figure 2. The Number of Monitoring Program Projects Funded, by Organization Type, in the Southeast Alaska Region since 2000**





## **PRIORITY INFORMATION NEEDS**

The 2020 Notice of Funding Opportunity for the Southeast Alaska Region identified the following six priority information needs:

- Reliable estimates of Sockeye Salmon escapement and in-season estimates of harvest at the following systems: Kanalku, Klawock, Hetta, Falls Lake, Sarkar, Kook, Neva, Karta, Hatchery, Eek, Kah Sheets, Klag, Gut, Kutlaku, Salmon Bay, Sitkoh, Hoktaheen, Alecks Creek, and Lake Leo.
- Escapement indexes for Eulachon at the Unuk River and Yakutat Forelands.
- Population assessment for Eulachon for northern Southeast Alaska.
- Traditional ecological knowledge of how each community distributes harvest between Sockeye Salmon systems available to them.
- Reliable estimates of salmon populations and harvests in the sport and subsistence fisheries at Kah Sheets and Alecks Creek.
- Ethnographic study of the Yakutat subsistence salmon fishery.

## **AVAILABLE FUNDS**

Federal Subsistence Board guidelines direct initial distribution of funds among regions. Regional budget guidelines provide an initial target for planning. For 2020, the Department of the Interior, through the U.S. Fish and Wildlife Service, will provide an anticipated \$1.5 million in funding statewide for new projects in 2020. The U.S. Department of Agriculture, through the U.S. Forest Service, has historically provided some funding. The amount of U.S. Department of Agriculture funding available for 2020 projects is uncertain.

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

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

For the 2020 Monitoring Program, three proposals were submitted for the Southeast Alaska Region. The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit (**Table 1**). These scores remain confidential. An executive summary for each proposal submitted to the 2020 Monitoring Program for the Southeast Alaska Region is in **Appendix 2**.

**Table 1.** Projects submitted for the Southeast Alaska Region 2020 Monitoring Program, including total funds requested and average annual funding requests.

<b>Project Number</b>	<b>Title</b>	<b>Total Project Request</b>	<b>Average Annual Request</b>
20-600	Eek Lake and Kasook Lake Subsistence Sockeye Salmon Stock Assessment Project	\$364,202	\$91,051
20-601	District 1 Eulachon Population Assessment	\$218,996	\$54,749
20-603	Northern Southeast Alaska Eulachon Population Dynamics Monitoring	\$658,034	\$164,509
<b>Total</b>		<b>\$1,241,232</b>	<b>\$310,309</b>

### TECHNICAL REVIEW COMMITTEE JUSTIFICATION FOR PROPOSAL SCORES

**Project Number:** 20-600

**Project Title:** Eek Lake and Kasook Lake Subsistence Sockeye Salmon Stock Assessment Project

**Technical Review Committee Justification:** Principal Investigator Anthony Christianson, environmental planner for the Hydaburg Cooperative Association, proposes to lead a Sockeye Salmon stock status and trends project at Eek and Kasook lakes. The Eek Lake portion of this project addresses a 2020 Priority Information Need in the 2020 Notice of Funding Opportunity while the Kasook Lake portion does not. Sockeye Salmon stock status information from both systems would be useful for fisheries management. The study plans for this project are similar to the Hetta Lake project (18-604) and other Sockeye Salmon Monitoring Program projects in Southeast Alaska. The objectives are clear, measurable, and mostly achievable. However, there are a few concerns with the methods that may be addressed by input from State and Federal biologists through an informal commitment of assistance. The principal investigator is responsible for overseeing the entire project with technical assistance from co-investigator Ms. Cathy Needham, and State and Federal biologists. The cost of the project is reasonable and about average, considering there is no harvest monitoring component and no weir or crew on site at Kasook Lake.

**Project Number:** 20-601

**Project Title:** District 1 Eulachon Population Assessment

**Technical Review Committee Justification:** This project would allow Federal in-season managers and fisheries biologists to continue monitoring the status of the Behm Canal Eulachon population, which has traditionally been an important subsistence resource. The Eulachon population has been closed to fishing since 2006 because of critically low levels, which led the Southeast Subsistence Regional Advisory Council to identify the development of escapement indices for Unuk Eulachon to be a priority information need. While the methods proposed will not provide a precise population estimate, they should be sufficient for monitoring trends in Eulachon abundance. In the past, the timing of surveys has been a challenge because of inclement spring weather. Maintaining a survey crew in the field throughout the

Eulachon spawning season should improve the chances of gathering useful information. The investigators have experience conducting Monitoring Plan projects, including the previous Eulachon monitoring efforts. The cost of the project is reasonable, though the budget may underestimate the cost of conducting aerial surveys.

**Project Number:** 20-603

**Project Title:** Northern Southeast Alaska Eulachon Population Dynamics Monitoring

**Technical Review Committee Justification:** The goal of this proposal is to develop a monitoring strategy for Eulachon populations in northern Southeast Alaska. The Southeast Subsistence Regional Advisory Council identified that a population assessment for Eulachon for northern Southeast Alaska is a priority information need. The spawning biomass of Eulachon will be assessed using both mark-recapture methods and quantitative environmental DNA (eDNA) in the Chilkoot River, and eDNA alone at nine other locations in the Lynn Canal area. The use of quantitative eDNA to assess fish abundance is an emerging science, but the project partners have been using it for several years with encouraging results. The plan would be improved by addition of a mechanism to calibrate the eDNA results at the other sites. The project partners include a number of non-profit and tribal agencies, and the development of capacity in those agencies is a goal of the project. The expenses for the project are reasonable and well-planned, but the overall cost is high due to its ambitious scope. If the use of eDNA proves to be an effective way to monitor Eulachon populations, it would be an important advancement that could be used at other locations, and greatly improve the cost effectiveness of future monitoring efforts.

**APPENDIX 1  
PROJECTS FUNDED IN THE SOUTHEAST ALASKA REGION SINCE 2000**

Project Number	Project Title	Investigators
<b><i>Estimation of Sockeye Salmon Escapement</i></b>		
00-043	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
00-044	Falls Lake Sockeye Salmon Stock Assessment	ADF&G, OVK
01-125	Gut Bay, Kook, and Hoktaheen L Sockeye Salmon Escapement Index	ADF&G, OVK
01-126	Kanalku, Hasselborg, and Sitkoh Lakes Sockeye Stock Assessment	ADF&G
01-127	Thoms, Salmon Bay, Luck Lakes Sockeye Salmon Escapement Index	ADF&G, WCA
01-128	Klag Bay Sockeye Salmon Stock Assessment	ADF&G, STA, USFS
01-130	Hetta Lake Sockeye Salmon Stock Assessment	ADF&G, HCA
01-175	Salmon Lake Sockeye and Coho Salmon Stock Assessment	ADF&G, STA, NSRAA, USFS
01-179	Virginia Lake Sockeye Salmon Assessment	USFS
02-012	Neva and Pavlof Sockeye Salmon Stock Assessment	USFS, HIA

<b>Project Number</b>	<b>Project Title</b>	<b>Investigators</b>
02-017	Redfish Bay Sockeye Salmon Stock Assessment	STA, ADF&G, USFS
03-007	Eek Lake Sockeye Salmon Stock Assessment	HCA, ADF&G
04-604	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
04-605	Kanalku & Sitkoh Lakes Sockeye Salmon Stock Assessment	ADF&G, ACA
04-606	Hetta Lake Sockeye Salmon Stock Assessments	ADF&G, HCA
04-607	Falls, Gut, & Katlaku Subsistence Sockeye Stock Assessment	ADF&G, ACA
04-608	Salmon Lake Sockeye Salmon Stock Assessment	STA
04-609	Klag Bay Sockeye Salmon Assessment	STA, ADF&G, USFS
05-601	Kook Lake Sockeye Salmon Assessment	ADF&G, ACA, USFS
05-603	Klawock Lake Sockeye Salmon Assessment	ADF&G, USFS
06-601	Neva Lake Sockeye Salmon Assessment	USFS
06-602	Katlaku Lake Sockeye Salmon Assessment	ADF&G, OVK
07-601	Hatchery Creek Sockeye Salmon Assessment	OVK, USFS
07-606	Hetta Lake Sockeye Salmon Assessment	ADF&G
07-607	Kanalku Lake Sockeye Salmon Assessment	ADF&G, ACA
07-608	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
07-609	Falls Lake Sockeye Salmon Assessment	ADF&G, OVK
08-600	Karta River Sockeye Salmon Assessment	OVKa, ADF&G, USFS, BIA
10-600	Karta River Sockeye Salmon Assessment	OVKa, BIA, USFS, ADF&G
10-601	Hatchery Creek Sockeye Salmon Assessment	USFS, OVKa, BIA
10-604	Klag Lake Sockeye Salmon Assessment	STA, USFS
10-605	Sitkoh Lake Sockeye Salmon Assessment	USFS, ACA, ADF&G
10-606	Hetta Lake Sockeye Salmon Assessment	HCA, KECS
10-607	Kanalku Lake Sockeye Salmon Assessment	ADF&G, ACA
10-609	Falls Lake Sockeye Salmon Assessment	USFS, OVK
10-610	Kook Lake Sockeye Salmon Assessment	USFS, ACA
10-611	Redoubt Lake Sockeye Salmon Assessment	USFS, ADF&G
10-612	Neva Lake Sockeye Salmon Assessment	USFS, HIA
14-601	Redoubt Lake Sockeye Salmon Assessment	USFS, ADF&G
14-602	Falls Lake Subsistence Salmon Stock & Harvest Assessment	USFS, OVK
14-603	Hetta Lake Sockeye Salmon Assessment	HCA, KECS
14-605	Hatchery Creek Sockeye Salmon Assessment	USFS, OVKa
14-606	Klawock Lake Sockeye Salmon Assessment	USFA, KCA, POWHA
14-608	Kanalku Lake Subsistence Sockeye Salmon Assessment	ADF&G, ACA, USFS
14-609	Klag Lake Sockeye Salmon Stock Assessment	STA

<b>Project Number</b>	<b>Project Title</b>	<b>Investigators</b>
14-610	Kook Lake Sockeye Salmon Stock Assessment	USFS, ACA
14-611	Sitkoh Lake Sockeye Salmon Stock Assessment	USFS, ACA
14-612	Neva Lake Sockeye Salmon Stock Assessment	USFS, HIA
16-604	Eek Lake Sockeye Salmon Stock Assessment	USFS, HIA
18-602 <sup>a</sup>	Falls Lake Sockeye Salmon Stock Assessment	USFS, OVK
18-603 <sup>a</sup>	Gut Bay Sockeye Salmon Stock Assessment	USFS, OVK
18-604 <sup>a</sup>	Hetta Lake Sockeye Salmon Stock Assessment	HCA, KECS
18-607 <sup>a</sup>	Neva Lake Sockeye Salmon Stock Assessment	USFS, HIA, ADF&G
18-609 <sup>a</sup>	Sitkoh Lake Sockeye Salmon Stock Assessment	USFS, ACA, ADF&G
18-610 <sup>a</sup>	Klag Lake Sockeye Salmon Stock Assessment	STA
<b>Documentation of Subsistence Use Patterns for Salmon</b>		
00-015	SE Alaska Subsistence Fisheries Database Development	ADF&G
00-045	SE Tribes Traditional Subsistence Territory Mapping	USFS, OVK, ACA, HIA
01-091	East Alsek River Salmon Historical Use and TEK	YTT
01-103	SE Subsistence Fisheries GIS Database	ADF&G
01-104	Kake Sockeye Salmon Subsistence Harvest Use Pattern	ADF&G, OVK
02-038	SE Subsistence Fisheries GIS Database Development	ADF&G, CCTHITA, TST
02-049	Wrangell Salmon Subsistence Harvest Use Patterns	ADF&G, WCA, USFS
02-104	Hoonah and Klawock Salmon Survey	ADF&G, CCTHITA, TST
03-651	Klawock River Subsistence Steelhead Harvest & Use Patterns	ADF&G
04-651	SE Alaska Salmon TEK and Subsistence Monitoring	STA, ADF&G
04-652	Subsistence TEK Database	ADF&G, STA
06-651	Southeast Alaska Survey of Customary Trade	CCTHITA
07-651	Hydaburg Sockeye Salmon Customary & Traditional System	HCA, UAA
08-615	Maknahti Island Subsistence Herring Fishery Assessment	STA, PSU
<b>Prince of Wales Island Steelhead</b>		
01-105	POW Island Steelhead/Rainbow Trout Harvest Use Patterns	ADF&G
05-604	Prince of Wales Steelhead Assessment	ADF&G, OVK
08-650	POW Island Steelhead Trout Subsistence Harvest Survey	OVKa, HCA, BIA, USFS
<b>Estimation of Non-salmon Species</b>		
07-610	Behm Canal Eulachon Genetics	USFWS
08-607	Unuk River Eulachon	USFS
10-603	Yakutat Eulachon Surveys	USFS, YSB, ADF&G
14-607	Unuk River Eulachon	USFS

<sup>a</sup> = On-going projects during 2019.

Abbreviations: **ACA** = Angoon Community Association, **ADF&G** = Alaska Department of Fish and Game, **BIA** = Bureau of Indian Affairs, **CCTHITA** = Central Council of Tlingit & Haida Indian Tribes of Alaska, **HCA** = Hydaburg Cooperative Association, **HIA** = Hoonah Indian Association, **KCA** = Klawock Cooperative Association, **KECS** = Kai Environmental Consulting Services, **NSRAA** = Northern Southeast Aquaculture Association, **OVK** = Organized Village of Kake, **OVKa** = Organized Village of Kasaan, **POWHA** = Prince of Wales Hatchery Association, **PSU** = Portland State University, **STA** = Sitka Tribe of Alaska, **TST** = Third Sector Technologies, **UAA** = University of Alaska Anchorage, **USFS** = USDA Forest Service, **USFWS** = USDOF Fish and Wildlife Service, **WCA** = Wrangell Cooperative Association, **YSB** = Yakutat Salmon Board, and **YTT** = Yakutat Tlingit Tribe.

## APPENDIX 2 EXECUTIVE SUMMARIES

The following executive summaries were written by principal investigators and were submitted to the Office of Subsistence Management as part of proposal packages. They may not reflect the opinions of the Office of Subsistence Management or the Technical Review Committee. Executive summaries may have been altered for length.

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<b>Project Number:</b>	20-600			
<b>Title:</b>	Eek Lake and Kasook Lake Subsistence Sockeye Salmon Stock Assessment Project			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Anthony Christianson, Hydaburg Cooperative Association			
<b>Co-investigator:</b>	Cathy Needham, Kai Environmental Consulting Services			
<b>Project Cost:</b>	<b>2018:</b> \$99,114	<b>2019:</b> \$93,740	<b>2020:</b> \$85,350	<b>2021:</b> \$85,998
<b>Total Cost:</b>	\$364,202			

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**Issue:** HCA is proposing to continue work on determining escapement of sockeye salmon into Hydaburg’s important subsistence systems, Eek Lake and Kasook Lake. This information will continue to allow HCA and resource management agencies to monitor each population and compare it to subsistence and commercial fisheries, in order to manage the system in-season more accurately.

**Objectives:**

- 1) Estimate escapement of sockeye salmon adults into Eek Lake using a rigid bipod weir.
- 2) Estimate the age, sex and length composition of the sockeye salmon spawning in Eek Lake with a coefficient of variation less than 5% for all age classes.
- 3) Estimate the escapement of sockeye into the Eek system using mark-recapture methods so that the coefficient of variation less than 20%
- 4) Index the annual escapement of sockeye salmon into Kasook Lake using mark-recapture methods so that the estimated coefficient of variation is less than 20%.
- 5) Estimate age, sex and length composition of the sockeye salmon spawning in Kasook Lake with a coefficient of variation less than 5% of all age classes.

**Methods:** A channel spanning bipod weir will be constructed on the outlet stream of Eek Lake, with a trap to capture fish migrating upstream to spawn. The weir will operate study each year, and all fish crossing the weir will be identified and counted. Approximately 600 fish will be sampled for age, sex and length data. Fish will be measured and sexed on site. Scales will be removed and sent to ADFG to be read to determine age and the age, sex and length composition of the population will be determined. At the weir, 15% of returning sockeye will also be marked with an adipose clip in order to conduct a mark-recapture estimate. Fish will be recaptured on the spawning ground during at least four events, and a pooled Peterson estimate will be used to estimate the sockeye salmon spawning population at Eek, as well as to validate the weir count.

Sockeye salmon are also subsistence harvested each year at Kasook Lake, therefore a mark-recaptures study will be conducted in order to estimate the spawning population. In 2020, a reconnaissance effort to identify spawning grounds will be conducted and the most appropriate mark-recapture methods will be determined. Multiple 2-day mark-recapture events will be planned, where sockeye are marked on day 1 and recapture on day 2. Data will be analyzed using a Jolly-Seber estimate. Additionally, fish that are captured for marking will also be sampled for scales, in order to determine the age, sex, and length composition of the population. The sample goal will be 600 fish, but all fish will be sampled.

**Partnership/Capacity Building:** Since 2001, HCA has worked with Alaska Department of Fish and Game and the U.S. Forest Service to build capacity on Fisheries Resource Monitoring Program projects with a goal of becoming the principle investigator. In 2010, HCA became the principle investigator for the Hetta Lake Subsistence Sockeye Salmon Stock Assessment Project and in 2015 began stock assessment work at Eek Lake as a principle investigator. As new methods with mark-recapture are being proposed, HCA will rely on their partnership with the ADFG and USFS to work in-season with HCA crews, and to assist the contracted biologist position with data analyses. ADFG will still offer scale reading services to the project and remain involved through permitting of the project, as well as using in-season data for managing a commercial fishery for all of Cordova Bay. The USFS continues to offer technical assistance to HCA’s fisheries program, with assistance in project planning and in scientific reporting.

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<b>Project Number:</b>	20-601			
<b>Title:</b>	District 1 Eulachon Population Assessment			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Jeff Reeves, Craig Ranger District, US Forest Service			
<b>Co-investigators:</b>	Jon Hyde, Ketchikan/Misty Fjords Ranger District, US Forest Service Tony Gallegos, Ketchikan Indian Community (KIC)			
<b>Project Cost:</b>	<b>2020:</b> \$54,314	<b>2021:</b> \$54,602	<b>2022:</b> \$54,893	<b>2023:</b> \$55,187
<b>Total Cost:</b>	\$218,996			

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**Issue:** Eulachon systems are typically large glacial rivers located on the mainland in Southeast Alaska in Tongass National Forest. The Unuk River has been the primary commercial/subsistence fishing location for Eulachon. The Unuk River, which drains into Burroughs Bay in Behm Canal, is located approximately 55 nautical miles northeast of Ketchikan. Other drainages in the Ketchikan area where Eulachon have been noted and harvested include: Klahini River, Chickamin River, Wilson & Blossom

Rivers, and Carroll Inlet/Creek. Most of these drainages, except for Carroll Inlet/Creek, are located in the Misty Fjords National Monument Wilderness and are of remote access by air or by boat.

The Unuk has been fished for subsistence, personal use and commercial harvest for many years. Besides providing food for marine mammals, fish and birds, Eulachon provide the first subsistence opportunity of the year for people living near these systems. The first documented commercial harvest occurred in 1940 on the Unuk River and continued sporadically on this system until 2001 when the State managed commercial fishery was shut down. The fishery resumed until 2005 under Federal subsistence management. Since 2005, the fishery has been closed by both State and Federal managers due to poor Eulachon returns.

The majority of the harvest in District 1 has occurred in the lower stretches of the Unuk River with very little documentation of harvest from the other listed locations. Although prior to 2001, historical Eulachon harvest had taken place under commercial regulations, the subsistence fishery under Federal management is just as important in the eyes of the subsistence user as provisions allow for customary trade of the resource. The primary purpose of this harvest has been to distribute Eulachon to the communities of Saxman, Metlakatla, Ketchikan and other outlying areas. Due to the great distance of the Unuk River from these communities, local users depended on the commercial harvesters for their yearly Eulachon. The ADFG Division of Subsistence documented in 1987 that 27% of residents in the rural community of Metlakatla utilize Eulachon.

**Objectives:**

**Objective #1** – Document biomass and spawning locations of Eulachon in the Unuk River, Chickamin, Klahini, Wilson, Blossom Rivers and in Carroll Inlet/Carroll Creek.

**Objective #2** – Conduct age-weight-length (AWL) measurements along with sex of collected samples.

**Objective #3** – Document harvest methods, harvest levels, and run timing by on-site observations.

**Objective #4** – Summarize yearly stock characteristics and harvests at the various locations in District 1. Review Eulachon stocks in Alaska and the Pacific Northwest and continue to expand collaboration with Canada on Eulachon related research. Investigators desire to travel to Eulachon research council meetings to share and obtain new information should they become available.

**Methods:** (1) Estimates of biomass will be obtained through on the ground and aerial surveys will occur on the Unuk River. Surveys at the Chickamin, Klahini, Wilson and Blossom Rivers as well as Carroll Inlet/Carroll Creek will occur through aerial surveys. (2) If possible, length and sex samples will be taken from Eulachon returns for analysis. (3) Harvest estimates will be gathered if fishery is not closed. (4) Yearly activity summarized and compared with Canadian Eulachon activity.

**Products:** Results of the study will be available as annual progress and final reports submitted to FIS-OSM; via papers submitted for publication through scientific fisheries journals and ADF&G Technical Reports; and as formal presentations provided at SEASRAC, Federal/State agency, and professional society meetings.

**Investigators Ability and Resources:** Jeff Reeves, Subsistence Fisheries Biologist, and Jon Hyde, Fish & Wildlife Staff, will be responsible for overall project administration, coordination with OSM/FIS staff, development of the study design and operation plan, on-site technical assistance to tribal and state/federal agency staff, data analysis/interpretation, and editing/delivery of progress and final reports. Tony



Gallegos, Cultural Resources Director, will be responsible for project administration and coordination regarding KIC staff as well as participate operationally on the grounds, and assist in editing/delivery of progress and final reports.

**Partnership and Capacity Building:** This proposed project has substantial capacity development aspects associated with it. The USFS will be provided funds to compensate the field fisheries biologists and fisheries technicians needed for this study to assess Eulachon while providing mentoring to KIC staff. Members of the Metlakatla Indian Community, Organized Village of Saxman, and KIC will be consulted to provide valuable traditional ecological knowledge regarding Eulachon in the area. Sharing of data among all of the agencies involved in this subsistence fishery will provide better information to improve management of Eulachon for all users.

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<b>Project Number:</b>	20-603			
<b>Title:</b>	Northern Southeast Alaska Eulachon Population Dynamics Monitoring			
<b>Geographic Region:</b>	Southeast Alaska Region			
<b>Data Type:</b>	Stock Status and Trends			
<b>Principal Investigator:</b>	Meredith Pochardt, Takshanuk Watershed Council, Haines AK			
<b>Co-investigators:</b>	Harriet Brouillette, Chilkoot Indian Association, Haines AK Reuben Cash, Skagway Traditional Council Taal Levi, Oregon State University			
<b>Project Cost:</b>	<b>2020:</b> \$179,176	<b>2021:</b> \$158,397	<b>2022:</b> \$158,762	<b>2023:</b> \$161,699
<b>Total Cost:</b>	\$658,034			

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A subsistence lifestyle is the backbone of Alaskan native culture. A key component of that subsistence lifestyle for many coastal tribes has been the eulachon (*Thaleichthys pacificus*). Eulachon are a small anadromous smelt with a highly nutritious fat content (20%) that represent an important nutritional resource at the base of the food web (Moody, 2008), producing an important oil for medicine, food, and fuel and a high value trade due to its relative scarcity and desirability (Betts 1994). The majority of eulachon populations have been declining since the 1990s (Hay et al. 2000). In 2010 the National Marine Fisheries Service (NMFS) listed the southern distinct population segment (DPS) in Washington, Oregon, and California as threatened under the Endangered Species Act (NOAA, 2010). While some of the declines have been well documented, most populations of eulachon are either unknown or anecdotal (Betts, 1994). Eulachon abundance throughout southeast Alaska has unexpectedly and precipitously declined in key subsistence fisheries in recent years (Southeast Region Planning Workgroup, 2006). To complicate eulachon population monitoring, unlike salmonids, they do not necessarily return to their natal river to spawn, but rather select a river within a region (Flannery, et al. 2009). Thus a decline in spawning biomass in any one river system does not necessarily represent a decline in the eulachon population. This lack of knowledge combined with variable spawning biomass and low fidelity to natal rivers complicates management decisions and necessitates population monitoring techniques that can be implemented regionally. The lack of eulachon population information and the cultural and subsistence value of the species led the Chilkoot Indian Association (CIA) to partner with the Takshanuk Watershed Council (TWC) to begin a eulachon mark-recapture population estimate on the Chilkoot River in 2010 (Figure 1). This population estimate was expanded in 2014 with the addition of environmental DNA (eDNA) data collection through a partnership with Dr. Taal Levi and Oregon State University (OSU). Due to the

regional population structure of eulachon this study was expanded in 2016 to the Taiya and Skagway Rivers through a partnership with Skagway Traditional Council (STC). Through funding from the Bureau of Indian Affairs in 2017 this study was further expanded to collect eDNA data at 10 rivers in northern Southeast Alaska as well as the continuation of the Chilkoot mark-recapture population. Development and testing of low-cost long-term monitoring methods, such as environmental DNA (eDNA), is needed to facilitate long-term monitoring of this critical subsistence resource in order to enable detection of changes in population or phenology.

The overall goal of this proposal is to build the capacity of tribal governments to develop a regional tribally-based eulachon population monitoring network to analyze annual spawning biomass and run timing of eulachon. This will be accomplished through addressing the following objectives.

Objective 1: determine eulachon spawning biomass at a region-wide scale in northern Southeast Alaska utilizing mark-recapture methods and environmental DNA (eDNA)

Objective 2: Determine the spatial and temporal dynamics of eulachon spawning including run timing and environmental covariates

Objective 3: Present research findings to the Southeast Subsistence Advisory Committee, the Southeast Form on the Environment, and the North Pacific Research Board annual Marine Science Symposium.

Objective 4: Develop a regional eulachon working group to 1) establish a long-term monitoring plan, 2) produce a region-wide eulachon status report.

## ANNUAL REPORTS

### **Background**

ANILCA established the Annual Reports as the way to bring regional subsistence uses and needs to the Secretaries' attention. The Secretaries delegated this responsibility to the Board. Section 805(c) deference includes matters brought forward in the Annual Report.

The Annual Report provides the Councils an opportunity to address the directors of each of the four Department of Interior agencies and the Department of Agriculture Forest Service in their capacity as members of the Federal Subsistence Board. The Board is required to discuss and reply to each issue in every Annual Report and to take action when within the Board's authority. In many cases, if the issue is outside of the Board's authority, the Board will provide information to the Council on how to contact personnel at the correct agency. As agency directors, the Board members have authority to implement most of the actions which would effect the changes recommended by the Councils, even those not covered in Section 805(c). The Councils are strongly encouraged to take advantage of this opportunity.

### **Report Content**

Both Title VIII Section 805 and 50 CFR §100.11 (Subpart B of the regulations) describe what may be contained in an Annual Report from the councils to the Board. This description includes issues that are not generally addressed by the normal regulatory process:

- an identification of current and anticipated subsistence uses of fish and wildlife populations within the region;
- an evaluation of current and anticipated subsistence needs for fish and wildlife populations from the public lands within the region;
- a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs related to the public lands; and
- recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

Please avoid filler or fluff language that does not specifically raise an issue of concern or information to the Board.

### **Report Clarity**

In order for the Board to adequately respond to each Council's annual report, it is important for the annual report itself to state issues clearly.

- If addressing an existing Board policy, Councils should please state whether there is something unclear about the policy, if there is uncertainty about the reason for the policy, or if the Council needs information on how the policy is applied.
- Council members should discuss in detail at Council meetings the issues for the annual report and assist the Council Coordinator in understanding and stating the issues clearly.

- Council Coordinators and OSM staff should assist the Council members during the meeting in ensuring that the issue is stated clearly.

Thus, if the Councils can be clear about their issues of concern and ensure that the Council Coordinator is relaying them sufficiently, then the Board and OSM staff will endeavor to provide as concise and responsive of a reply as is possible.

### **Report Format**

While no particular format is necessary for the Annual Reports, the report must clearly state the following for each item the Council wants the Board to address:

1. Numbering of the issues,
2. A description of each issue,
3. Whether the Council seeks Board action on the matter and, if so, what action the Council recommends, and
4. As much evidence or explanation as necessary to support the Council's request or statements relating to the item of interest.



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

**Federal Subsistence Board**  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503 - 6199



FOREST SERVICE

**AUG 16 2019**

OSM 19054.KW

Donald Hernandez, Chair  
Southeast Alaska Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chairman Hernandez:

This letter responds to the Southeast Alaska Subsistence Regional Advisory Council's (Council) fiscal year 2018 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to respond to these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of the issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

**1. Concerns about subsistence shrimp**

*The State of Alaska recently enacted restrictions in District 13A, B and C, out of conservation concerns for the shrimp stock in District 13C. The Council received public testimony, including comments from the Sitka Fish and Game Advisory Committee, regarding limits and restrictions placed on subsistence harvesting of shrimp under State regulations. There is a concern that the restrictions were based on anecdotal information and that the restrictions violate the Alaska subsistence statute that provides for a subsistence preference. Instead of enforcing law that prohibits illegal use of subsistence harvest (anecdotal information), additional restrictions were placed on the legitimate or legal subsistence harvesters, making it difficult to meet their subsistence needs. The reallocation of the resource seems to be away from a subsistence harvester to the commercial industry. Tier 2 of the State subsistence regulations provides that if there is not enough resource to meet everyone's needs, elimination/restriction starts with other user groups before the subsistence harvest is restricted. The State chose to limit the subsistence harvesters to two five-gallon buckets per trip, requiring more trips to try to meet needs—this approach is not cost-effective. Subsistence users are also required to fill out harvest reports with*

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*date, location and volume harvested, and there is a concern that this information will be used to establish an Amount Necessary for Subsistence (ANS). Lastly, "personal use" and "subsistence" are lumped into one category, contrary to State law distinguishing those two user groups.*

*Subsistence users are disturbed by these restrictions and the risk of similar actions taking place in other areas of Southeast Alaska in the future. The Council was informed that the Sitka Advisory Committee is attempting to pursue a review with the Board of Fisheries; however, the next Southeast cycle is another two years away. In the meantime, the Advisory Committee would like to see this matter in front of the public for more comments. It is anticipated that the Council will continue to hear more on the matter in the future, as there is a genuine fear that the increasing popularity of the harvest of shrimp in this area will result in a decline of the shrimp resource because of the commercial fishery. The State should recognize this subsistence resource and take that into consideration when managing it.*

*The Council expects to inform this Board in future Annual Reports of similar examples where users are restricted in State managed subsistence fisheries. The Council has been hearing public testimony on the State's violations of the Alaska State subsistence statute, and it intends to follow the issue closely to monitor how the State is providing subsistence priority. The Council will continue to keep this Board informed of specific actions occurring in the Southeast.*

**Response:**

Thank you for bringing this issue to the attention of the Board. Although this issue is outside the authority of the Board, it is within the charge of the Council to act as a forum for all subsistence concerns in the region. The Board encourages the Council to write a letter directly to the Alaska Board of Fisheries (BOF) to express the concerns that it has received. The Council may also consider submitting a proposal to the BOF during its next Southeast cycle to address the issue that has been voiced by subsistence users.

**2. Potential for Extra-Territorial Jurisdiction for Herring Harvest in Sitka Sound**

*The Council received public testimony regarding the ongoing concern about the lack of herring harvest in the Sitka Sound. A representative of the Sitka Tribe of Alaska, Kaagwaantaan Clan (who is also a Council member), provided the history of the Kaagwaantaan and Kiks.adi Clans' attempts to present information and persuade the Alaska Board of Fisheries to enact regulations which would protect the herring resource for subsistence use in the Sitka Sound area. As the herring resource continues to decline for subsistence users, the representative conveyed that the Kaagwaantaan Clan would like to request that the Federal government take over management of herring in the Sitka Sound area through extra-territorial jurisdiction (ETJ). The Clan would like to receive staff support from the Federal government. A hard copy and digital copy of the Federal Subsistence Board's procedure for extra-territorial jurisdiction<sup>1</sup>, as well as an example*

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<sup>1</sup> Federal Subsistence Board Procedures Addressing Petitions for Secretarial Extension of Jurisdiction for the

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*of such a petition, was provided to the representative as an aid to help the Kaagwaantaan Clan and the Sitka Tribe of Alaska move forward with drafting an extra-territorial petition.*

*For several years, the Council has heard public testimony regarding the scarcity of herring in Sitka Sound. That testimony shows both a failure to meet subsistence needs with this resource and a causal connection between that failure and activities occurring outside of Federal waters. The Council wishes to advise this Board that it may soon see a request for extra-territorial jurisdiction regarding this matter. If this occurs, the Council looks forward to participating in the ETJ process as expressed in the Board's procedures.*

**Response:**

Thank you for bringing this issue to the attention of the Board. The Council and the Board have historically worked on Sitka Sound Herring issues. As a result, the Federal marine waters in Sitka Sound, specifically in the Makhnati Island Area, have been closed by the Board to the harvest of herring and herring spawn to all but Federally qualified subsistence users. If the Kaagwaantaan Clan or any other entity chooses to petition the Secretaries of the Interior and Agriculture to implement Extraterritorial Jurisdiction, the Board will utilize the procedures contained in the attachment<sup>2</sup> and any additional direction provided by the Secretaries when developing recommendations. The Board and staff will work closely with the Council through the process.

**3. Commenting on Proposed Roadless Rule for Tongass**

*The Council has received information through hearings conducted by the U.S. Forest Service, as well as a formal presentation to the Council at its fall 2018 meeting, regarding the proposed Alaska Roadless Rule (Proposed Rule). The Proposed Rule has been submitted to replace the national 2001 Roadless Rule as it applies to Alaska. The 2001 rule was adopted to protect the social and ecological values and characteristics of inventoried roadless areas by prohibiting, with some exceptions, road reconstruction and timber harvest on inventoried roadless areas on National Forest System lands nationwide. The Proposed Rule would rescind many of those protections, and Council members have received several comments from their respective communities expressing concerns about impacts of the Proposed Rule to subsistence resources in the Tongass National Forest.*

*Due to the timing of its scheduled meeting, the Council could not provide public comment on this Proposed Rule. The Council Coordinator was informed that no extensions to the public comment period were being granted so the Council will not have an opportunity to provide public comment as a Federal Advisory Committee Act (FACA) committee on the scoping portion of the Proposed Rule.*

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*Implementation of a Federal Subsistence Priority, approved by the Federal Subsistence Board on July 18, 2005.*

*2 Federal Subsistence Board Procedures Addressing Petitions for Secretarial Extension of Jurisdiction for the Implementation of a Federal Subsistence Priority, approved by the Federal Subsistence Board on July 18, 2005.*

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*As the Board is aware, this Council has a right and responsibility under Section 805 of ANILCA to comment on policy and management plans affecting subsistence resources in this region. The Council intends to follow that mandate and make its recommendations through the course of whatever opportunities can be pursued and will try to make timely comments, though not necessarily following the timelines given by the Planning Committee for the Proposed Rule.*

*The proposed timeline for this Proposed Rule was not created with the Council's regular public meeting schedule in mind, and as such may require the Council to call a special meeting to provide comments. The next available public comment period will not occur until after release of the Draft Environmental Impact Statement (EIS) in approximately June 2019. Based on information provided at the fall 2018 meeting, the alternatives and related impacts will not likely be known at the Council's winter meeting. As such, the Council will not have the opportunity to receive information on the proposed alternatives, ask questions, deliberate on the information, and develop formal comments on impacts to subsistence resources from road construction and anticipated timber development that may result from implementing the Proposed Rule. In order to fulfill its Section 805 obligations, the Council will need to call a special meeting to be fully engaged in the issue. As a FACA committee, the Council is extremely concerned with its limited ability to provide substantial and timely input on a matter that may have significant impacts on subsistence uses of Federal public lands in this region. This hindering of our ability to meaningfully participate is a direct result of the agency's unusually-accelerated review under the National Environmental Policy Act.*

*The Council has received scientific testimony and been presented research from various sources regarding the impacts of timber harvests. Additionally, the Council has heard testimony over the years from subsistence users, imparting local and traditional ecological knowledge. All of these sources, along with the knowledge and awareness of the Council members themselves, have equipped this Council with a wealth of information for the region which should be included in the analyses conducted on this matter for the Draft Environmental Impact Statement.*

*Congress, through enacting Section 805, and the Secretaries, through appointing the membership of this Council, have recognized that the Council has specialized knowledge and should have a meaningful role in providing input on any significant restrictions of subsistence uses and providing information to minimize adverse impacts upon subsistence uses and resources. As such, the Council feels that it is obligated to make that knowledge known through public comment on this matter. Therefore, the Council has drafted a letter to the U.S. Forest Service regarding the Proposed Rule. This initial comment is based on years of testimony and discussion of development and its impact on subsistence resources. The Council through its letter also conveyed its concern about the process, specifically, the timeline and expedited review. Of great importance and dismay to the Council was that both the scoping and Draft EIS comment periods fell outside the Council's meeting cycles*



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*The Council requests that the Board support any special meeting(s) that need to be held so that the Council can timely respond to anticipated deadlines generated from this most-important process; specifically relating to providing comments to the alternatives that are proposed in the Draft Environmental Impact Statement.*

**Response:**

The Board recognizes the Council's responsibility in fulfilling its role as a Federal Advisory Committee and appreciates its efforts to provide meaningful input regarding subsistence use and resources as outlined in Section 805 of ANILCA. The next opportunity to provide specific information for consideration through public comment on the Alaska Roadless Rule will be after the release of the Draft Environmental Impact Statement (DEIS), which is anticipated to be late summer/early fall 2019. It is the Board's understanding that the Council intends to call a special telephonic meeting to discuss the DEIS and preferred alternative so that it may develop detailed comments. The Board requests that the Office of Subsistence Management (OSM) assist the Council with this meeting to ensure that the Council develop on record and submit public comments within the formal public comment period.

**4. State Recognition of Chinook Salmon as Important Subsistence Resource**

*At its fall meeting, the Council heard testimony regarding the State's closure of the Chinook Salmon fishery near Angoon. The testimony reflected that the procedures employed by the State in enacting the closure lacked due process. Subsistence users were the only user group not given an opportunity to weigh in on the issue. The Federal Subsistence Board has already recognized the customary and traditional use of Chinook Salmon throughout the Southeast Region. The Council would like to know of any options available where it could ask the State to recognize this customary and traditional use of Chinook Salmon in its management of this important subsistence resource. Further, the Council would like this Board to encourage the State to notify local tribes and communities of an impending closure, so these subsistence users have an opportunity to recommend a subsistence preference, if allowed and appropriate, in a circumstance of conservation concern.*

**Response:**

The State recognizes customary and traditional uses of Chinook Salmon in the Angoon area and is therefore mandated to manage Chinook Salmon for a subsistence preference; however, the State allows only the incidental harvest of Chinook Salmon (5 AAC 01.730. *Subsistence fishing permits*). While there are no State subsistence harvest seasons or limits for Chinook Salmon, regulations state:

*(b) Permits will not be issued for the taking of coho salmon from the Taku River and Stikine River drainages, or for king salmon. However king or coho salmon taken incidentally by gear operated under terms of a subsistence permit for other salmon are*

*legally taken and possessed for subsistence purposes as described in (j) of this section (5 AAC 01.730. Subsistence fishing permits).*

*(j) Salmon, trout, or char taken incidentally by gear operated under the terms of a subsistence permit for salmon are legally taken and possessed for subsistence purposes, except that the possession limit for king salmon is two fish. A holder of a subsistence salmon permit must report any salmon, trout, or char taken in this manner on the permit holder's permit calendar.*

The Council can consider submitting a proposal to the Alaska Board of Fisheries to modify these State regulations. The next scheduled meeting to modify finfish regulations in Southeast Alaska is in January 2021. The deadline for submitting proposals is April 10, 2020.

##### **5. Staff support present at Council meetings**

*In its previous Annual Report, the Council shared its concern regarding funding for consistent technical staff support at Council meetings and provided examples of the impact that this lack of in-person staff had on its work. This Board responded, "The Board agrees with the Council that it is important to have appropriate Federal staff at the Council meetings to work with the Council. While there have been reductions in Federal travel budgets, the Council can expect continuing biological support at its meetings."*

*Based on observations at its latest meeting, the Council would like to revisit this issue. In particular, the Council continued extensive engagement on Unit 2 wolf management issues, and, despite the issue being on the agenda, the Council lacked Federal staff support to assist in discussion with the working group. This is the second time that Unit 2 wolf discussions were on the agenda, but Federal biologist support, consistently experienced at higher levels in previous years, was not available. Likewise, the Council was surprised that the Sitka-based Federal fisheries biologist, who wrote one of the analyses, was not present at the meeting. The Council would like to address any disconnects that are preventing Federal staff from attending the Council meetings, in person. The Council relies on this technical expertise, especially during the regulatory decision-making processes.*

*The Council wants to stress that Title VIII of ANILCA and its implementing regulations require that the Regional Advisory Councils are provided adequate staffing support. Section 805 requires that "adequate qualified staff" are assigned "to the regional advisory councils and [that they] make timely distribution of all available relevant technical and scientific support data" to the Councils. The regulations require the Board specifically to provide "available and appropriate technical assistance to the Regional Councils" 50 C.F.R. §100.10(e)(2); 36 C.F.R. §242.10(e)(2).*

*The Council has observed that over time, there are fewer Federal biological staff attending the*

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*meetings, resulting in less opportunity for discussions with the biologists who perform the Program's work. While some Federal staff have been able to participate by phone, communication and understanding between technical staff and Council members has often been difficult when only conducted telephonically. Several Council members have individually commented on the importance of having staff physically present to be available for on-the-spot questions, presentations, and working group activities that occur outside of the public meeting. The relationships and trust that the Council built with various U.S. Forest Service staff over the years are important to fulfill the obligations of the Council.*

*The Council therefore requests that the Board more proactively explore ways to improve on-site technical support and reverse this recent pattern of declining support. Whether such support is provided or not should be considered in light of statutory and regulatory obligations cited above.*

**Response:**

The Board agrees with the Council that it is important to have appropriate Federal staff at the Council meetings to work with the Council. As observed at the recent March 2019 SEARAC meeting in Wrangell, Alaska, many Federal agency personnel were present, at least eight Forest Service employees, two OSM employees, and one BIA employee, to provide assistance and present information to the Council. Federal staff assisted the Council in drafting nine wildlife regulatory proposals, eight letters, and one temporary special action request, as well as helping with other duties to facilitate a successful meeting. While there have been reductions in Federal travel budgets, the Council can expect continuing support at meetings and during the year.

**6. Council Representation at State Regulatory Meetings**

*In its last Annual Report, the Council stressed the importance of having its members attend State regulatory meetings such as the Alaska Board of Game and Board of Fisheries to represent its interests. In reply, the Board noted that such requests for travel funding would be provided budget-dependending and on a case-by-case basis. As a follow up, the Council would like to note that at its fall meeting, it stated on the record the need to send one of its members to attend the January Board of Game meeting in Petersburg to represent the Council on Proposal 43, related to Unit 2 wolf management. The Council submitted a request to the Office of Subsistence Management for travel funding, and was pleased to hear that the funding was approved. The Council would like to express its gratitude for the opportunity to send a Council member to engage directly with the Alaska Board of Game on this very important wildlife management issue.*

**Response:**

The Board agrees that Regional Advisory Council representation is important at Alaska Board of Game and Board of Fisheries meetings, especially when discussion topics may impact Federally qualified subsistence users. As previously noted, support for travel will be determined on a case-

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by-case basis for Council members to attend Alaska Board of Fisheries and Board of Game meetings. The Council must provide reasonable justification to participate in person when a State Board will be considering a proposal that the Council has submitted or when a proposal may impact Federally qualified subsistence users in their Region. Feel free to submit your requests for this additional travel with justification to both the OSM Assistant Regional Director and the Forest Service, Federal Subsistence Management Program Coordinator.

## **7. Concern about Water Contaminants**

*The Council has discussed concerns regarding water and land contaminants in the waters and lands throughout Southeast Alaska at several of its recent meetings and has weighed in on these areas of concern, from identifying issues in its annual reports to sending correspondence related to Transboundary Mining issues. At its fall meeting, the Council additionally elected to send three letters to address various issues related to water quality and pollution. One letter to the U.S. Forest Service urges that agency to facilitate the repeat of the 1981 baseline study that looked at what the natural levels of certain contaminants were in Hawk Inlet area. A second letter was sent to the Alaska Department of Environmental Conservation to comment on the issue of airborne fugitive dust, regarding the lead dust blowing from the Greens Creek mine (which ranks in the top ten on the EPA's Toxic Release Inventory). A third letter was sent to the Alaska Department of Environmental Conservation to find out if the previous seal sampling done in Hawk Inlet could be replicated.*

*The Council is charged with commenting and making recommendations on impacts to subsistence resources and, as such, will continue to explore water quality issues as they impact subsistence resources. This is both a conservation concern and a public health concern, because eating too much seal or salmon could bioaccumulate toxins. If subsistence users eat less seal or salmon because of the concern over these potential toxins, this could have a direct impact on the subsistence resources available to the user.*

### **Response:**

The Board appreciates your continued effort to utilize the Council process as a platform to voice regional subsistence concerns. The Board is grateful for your Council's continued diligence and efforts to reach out to other agencies so they may hear the voices and concerns of subsistence users from your region.

## **8. Climate Change**

*The effects of change in climate continue to be a unified concern across Southeast Alaska. Council members and their respective communities have observed many abnormalities and trends and would like additional information and data to determine what effect climate change is*

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*having on subsistence resources. Specifically, this Council is requesting information on general climate change effects including melting glaciers, warmer streams for salmon, and habitat changes for fish and wildlife.*

*The Council would like to inform the Board that it has also established a standing working group on climate change. It was created out of a need to be able to regularly discuss and raise issues related to climate change and make suggestions for future presentations to learn more about what is happening in Southeast Alaska to habitat and subsistence resources. The working group would not make recommendations on how to address climate change, but would develop a body of expertise in the Council and could make recommendations in the future on various rulemaking or NEPA processes that could involve impacts of climate change. The Council voted to have the membership of the working group include Robert Schroeder, Cathy Needham, John Yeager, and Don Hernandez, as well as Blake LaPerriere from the public (Sitka resident).*

### **Response:**

The Board acknowledges that the Council is seeking information on the effects of climate change—including melting glaciers, warming streams, and general habitat changes—on subsistence resources in Southeast Alaska, and supports its creation of a working group on climate change. Within the last five years, almost all of the Regional Advisory Councils have expressed an interest in developing greater understanding and documentation of climate change effects in their regions.

Your Council can identify and request to invite representatives from State, Federal, non-governmental, and research organizations to give presentations on climate change ecology in your region at its regular meetings. An initial list of candidate organizations is included below and OSM staff can facilitate these communications:

- Alaska Center for Climate Assessment and Policy
- Alaska Climate Adaptations Science Center
- Local Environmental Observer Network
- Scenarios Network for Alaska + Arctic Planning

### **9. Youth in Council Membership**

*The Council has enjoyed recent participation by local youth at its meetings. The Council recognizes the contributions of these young adults and values their input, experiences, and thoughts regarding their use of subsistence resources. The Council would like to continue this engagement and would like to investigate the possibility of facilitating the recruitment of youth in Council membership.*

*Title VIII of ANILCA expresses the importance for local and regional participation. Section 805(a)(3)(B) notes one function of the Council is “the provision of a forum for the expression of*

Chairman Hernandez

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*opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife within the region.” In addition to providing a forum, the Council would like to know if this expression of opinions could be sought through active participation as a Council member. Acknowledging that years of experience help applicants rank higher in scoring for membership, this Council asks this Board if there are opportunities for less-experienced persons to serve on the Council. The additional input and insight would be valuable in conducting Council business while providing an opportunity for youth or other interested persons to actively learn, participate, and gain valuable experience.*

**Response:**

The Board appreciates your advice regarding the value of a multitude of perspectives in natural resource management, including the value of knowledge held by youth. The Board too has been humbled and inspired by the youth who have come before it in recent years. These young people are passionate about conservation and subsistence, and their perspectives are frequently unique. Formal membership on the Subsistence Regional Advisory Councils requires a minimum age of 18, though youth can apply the year before they are seated. This does not prevent the Council from seeking the knowledge and advice of all age groups. We encourage your Council to continue to invite youth testimony at your meetings, to hold meetings in or near schools whenever possible, and to engage with the youth throughout your regions. The Board also encourages OSM to reach out to local educators, whenever possible, to inform them of upcoming meetings and opportunities.

Finally, the Board encourages your Council to seek opportunities for youth interaction and education. Some of our members recently participated in a mock Federal Subsistence Board meeting hosted by the University of Alaska Fairbanks. The students did a wonderful job of walking a proposal through the process. Anytime your members have a chance to teach our young people about subsistence and the Federal Subsistence Management Program please take the opportunity to do so. These are learning opportunities for youth and adults alike.

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

Sincerely,



Anthony Christianson  
Chair

Enclosure

Chairman Hernandez

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cc: Federal Subsistence Board

Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management

Thomas Whitford, Acting Deputy Assistant Regional Director

Office of Subsistence Management

Jennifer Hardin, PhD, Subsistence Policy Coordinator, Office of Subsistence Management

Steven Fadden, Acting Council Coordination Division Supervisor,

Office of Subsistence Management

Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management

Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management

George Pappas, State Subsistence Liaison, Office of Subsistence Management

DeAnna Perry, Council Coordinator, U.S. Forest Service

Southeast Alaska Subsistence Regional Advisory Council

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Special Project Coordinator, Alaska Department of Fish and Game

Interagency Staff Committee

Administrative Record

## **FEDERAL SUBSISTENCE BOARD PROCEDURES ADDRESSING PETITIONS FOR SECRETARIAL EXTENSION OF JURISDICTION FOR THE IMPLEMENTATION OF A FEDERAL SUBSISTENCE PRIORITY**

The US Code Title 5 Section 553(e); 7 CFR 1.28; and 43 CFR 14 allow citizens to petition the Secretaries of the Interior and Agriculture (Secretaries). The Secretaries will accept for consideration petitions to exert authority over hunting, fishing, or trapping activities occurring on non-Federal lands when such petitions indicate that those activities may be interfering with subsistence hunting, fishing, or trapping on the Federal public lands and waters to such an extent as to result in a failure to provide the subsistence priority as specified in Title VIII of the Alaska National Interest Lands Conservation Act.

The Secretaries carefully review each case and use a very high threshold when making their decision whether to extend Federal jurisdiction. Petitioners should submit sufficient facts and/or analytic standards to document both the failure to maintain a subsistence priority and how the failure relates to activities occurring off of Federal lands.

The Federal Subsistence Management Regulations for Public Lands in Alaska (36 CFR Part 242 and 50 CFR Part 100, §\_\_\_\_.10) clarify that the Secretaries have not delegated the authority to restrict or eliminate activities occurring on non-Federal lands to the Federal Subsistence Board (Board). However, §\_\_\_\_.10(d)(4)(xvii) of those regulations gives the Board the authority to evaluate whether activities on non-Federal lands may interfere with subsistence activities on Federal public lands or waters, to consult with the State of Alaska, the Regional Councils, and other Federal agencies, and to make recommendations to the Secretaries.

The Board will utilize the following procedures and any additional directions provided by the Secretaries when developing recommendations on a request for extension of Federal jurisdiction.

### **PROCEDURES**

1. Petitions should be addressed to the Secretaries of the Interior and Agriculture as follows:

Secretary of the Interior and Secretary of Agriculture  
c/o Chair, Federal Subsistence Board  
U.S. Fish and Wildlife Service, Office of Subsistence Management  
1101 East Tudor Road, MS 121  
Anchorage, AK 99503-6199



2. Each petition must clearly identify the affected subsistence activity, the Federal public lands or waters where that activity occurs, and how the subsistence priority has been harmed so as to result in a failure. Each petition should present substantial evidence demonstrating that the failure of the subsistence priority is specifically due to a hunting, fishing, or trapping activity that is occurring off of Federal public lands or waters. The information should describe what the interfering activity is, where and when it is taking place, and how it is causing the failure of the subsistence priority on the Federal public lands and waters.
3. Each petition should describe the desired result from Secretarial extension of jurisdiction and propose Federal regulations which would accommodate the subsistence priority.
4. The Board, upon receipt of such a petition, will forward the petition to the Secretaries, notify the State of Alaska and affected Regional Council(s), and may issue a notice to the general public of the request for extension of Federal jurisdiction.
5. If the Secretaries believe that public comment on the issue or extensive analysis will aid in consideration of the petition, they may request the Federal Subsistence Board to hold public meetings to solicit comments and to develop a more detailed analysis of the issue.
6. If directed to do so by the Secretaries, the Board and staff may conduct additional research and assemble information that assists in a thorough analysis. In developing their recommendation to the Secretaries, the Board may meet in public session and accept testimony on the petition.
7. Following review of all information, staff analyses, and public comments, the Board will forward their confidential recommendation to the Secretaries.

Following receipt of a recommendation from the Board, the Secretaries will promptly notify the petitioners of their final decision relative to the petition. A Secretarial decision constitutes the final administrative remedy for any petition.

Approved by the Federal Subsistence Board on July 18, 2005.



**U.S. Citizens, Permanent Residents, Temporary Resident with Lawful Status in the U.S. need the following documents:**

**Applying for an Alaska Real ID License, Permit or ID Card?**

**To ensure your application process is as smooth as possible, please complete all elements below:**

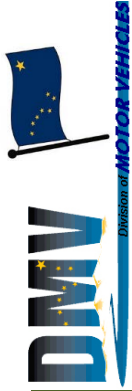
Use the checklist below to ensure that you have the correct documentation before visiting a Driver License office. If you have any questions about what is required, please visit our website at [www.Alaska.gov/DMV](http://www.Alaska.gov/DMV)

To be issued an Alaska Real ID driver license, permit or ID card, you must prove the following elements: your full legal name, identity, date of birth, lawful status in the United States, social security number, and proof of residential address. Multiple documents may be required to show all name changes.

If you cannot prove each of the required elements with the documents set forth below, you may be eligible to apply for a standard card. These guidelines may not cover every situation. Knowledge, vision, and/or other eligibility criteria may apply to your individual situation.

<b>Proof of your Name, Identity, Date of Birth, Lawful Status, and Primary Residency:</b> You can provide any combination of documents that prove the elements (some documents may be used to prove more than one element)			
Identity Name / Date of Birth	Lawful Status	Name Change	SSN Complete SSN
<input type="checkbox"/> Valid, unexpired U.S. passport or passport card <input type="checkbox"/> Certified copy of U.S birth certificate (issued by a city, county, or state vital statistics office) <input type="checkbox"/> Certified copy of birth certificate from a U.S. Territory. Puerto Rico birth certificates issued on or after July 1, 2010 <input type="checkbox"/> Consular Report of Birth Abroad of U.S. Citizen <input type="checkbox"/> Unexpired foreign passport with valid U.S. Visa and approved I-94 form <input type="checkbox"/> Certificate of Naturalization or Certificate of U.S. Citizenship <input type="checkbox"/> Valid, unexpired I-551 Resident Alien / Permanent Resident Card <input type="checkbox"/> Valid, unexpired I-766 Employment Authorization Document Card <input type="checkbox"/> Valid REAL ID license or ID card from a compliant state (Documentation of U.S. citizenship or lawful status is required)	<input type="checkbox"/> Valid, unexpired U.S. passport or passport card <input type="checkbox"/> Certified copy of U.S birth certificate (issued by a city, county, or state vital statistics office) <input type="checkbox"/> Certified copy of birth certificate from a U.S. Territory. Puerto Rico birth certificates issued on or after July 1, 2010 <input type="checkbox"/> Consular Report of Birth Abroad of U.S. Citizen <input type="checkbox"/> Certificate of Citizenship / Certificate of Naturalization <input type="checkbox"/> Unexpired foreign passport with valid U.S. Visa and approved I-94 form <input type="checkbox"/> Refugee/Asylee I-94 <input type="checkbox"/> I-551 Resident Alien / Permanent Resident Card <input type="checkbox"/> I-766 Employment Authorization Document Card	<input type="checkbox"/> Adoption documents that contain the legal name as a result of the adoption <input type="checkbox"/> Court Certificate of document that contains the legal name both before and after the name change <input type="checkbox"/> Marriage certificate <input type="checkbox"/> A certificate, declaration, or registration document verifying the formation of a civil union or domestic partnership <input type="checkbox"/> Certified Divorce Decree, Dissolution of marriage/civil union/domestic partnership document that contains the legal name as a result of the court action <input type="checkbox"/> Amended Birth Certificate <input type="checkbox"/> Certificate of Naturalization/ Certificate of Name Change <input type="checkbox"/> Certified Court Order That Contains all previous and current Names, and Date of Birth.	<input type="checkbox"/> Social security card (not metal) <input type="checkbox"/> W-2 form <input type="checkbox"/> Social Security Administration (SSA) 1099 form <input type="checkbox"/> Non-SSA-1099 form <input type="checkbox"/> Pay stub <input type="checkbox"/> I am ineligible for a social security number, a letter from SSA will issued within 90 days be required
Principal Residency	Two documents must be presented and cannot be handwritten. One document must have been issued within 90 days. Resident documents may have account numbers and balances redacted. <input type="checkbox"/> Rental or Lease Agreement with The Signature of The Owner/Landlord and The Tenant/Resident <input type="checkbox"/> Deed or Title to Residential Real Property <input type="checkbox"/> Mortgage Document <input type="checkbox"/> Home Utility Bills (Including Cellular Phone) <input type="checkbox"/> Employment Documents <input type="checkbox"/> Insurance Documents, Including Medical, Dental, Vision, Life, Home, Rental and Vehicle <input type="checkbox"/> Government Issued Tax Document <input type="checkbox"/> Statement from A Financial Institution/Bank <input type="checkbox"/> Voter Registration Confirmation Letter or Postcard Issued by The Alaska Division of Elections <input type="checkbox"/> Proof of Payment of Resident Tuition at A Public Institution of Higher Education in Alaska <input type="checkbox"/> A Letter on Letterhead from A Homeless Shelter, Shelter for Abused Women, Nonprofit Entity, Faith-Based Organization, Employer or Government Agency Within the United States Attesting That the Applicant Resides in Alaska <input type="checkbox"/> Alaska Certificate of Vehicle Titles or Registration (Issued At Least 30 Days Prior To The Date of Application) <input type="checkbox"/> Change of Address Confirmation by The U.S.P.S. <input type="checkbox"/> 1st Class Mail with Postmark (Mail May Be Handwritten) <input type="checkbox"/> Alaska Tribal Card (For Non-Standard Remote Alaska Addresses Only, Within the Tribal Area Indicated on The Card) <input type="checkbox"/> At DMV's Discretion Other Documents May Be Accepted. Please Contact 907-269-5551 For Assistance		

**The Alaska DMV must electronically verify documents to determine validity and status before issuance of an ID / Driver License For Renewals, you may be able to skip the office completely – Go to ALASKA.GOV/DMV to see if you are eligible!**



## Applying for an Alaska Standard License, Permit or ID Card?

**U.S. Citizens, Permanent Residents, Temporary Resident with Lawful Status in the U.S. need the following documents:**

**To ensure your application process is as smooth as possible, please complete all elements below:**

Use the checklist below to ensure that you have the correct documentation before visiting a Driver License office. If you have any questions about what is required, please visit our website at [www.Alaska.gov/DMV](http://www.Alaska.gov/DMV).  
 To be issued a Standard Alaska driver license, permit or ID card, you must prove the following elements: your full legal name, identity, date of birth, lawful status in the United States, social security number, and proof of residential address. Multiple documents may be required to show all name changes.  
 All documents presented must be unaltered certified originals, certified amended originals, or true copies certified by the issuing agency. Documents must be valid and unexpired and may not be laminated. Foreign documents must have certified English translation (DMV Form COFAT.PDF).

## FEDERAL LIMITS APPLY

**Proof of your Name, Identity, Date of Birth, Lawful Status and Primary Residency:**  
 You can provide any combination of documents that prove the elements (some docs may be used to prove more than one element)

Identity Name / Date of Birth	Secondary Identity	Lawful Status	Name Change	SSN Complete SSN	Principal Residency (Cannot Be Handwritten)
<input type="checkbox"/> Valid, Unexpired U.S. Passport or Passport Card <input type="checkbox"/> Certified Copy Of U.S. Birth Certificate (Issued by A City, County, Or State Vital Statistics Office) <input type="checkbox"/> Certified Copy of Birth Certificate from A U.S. Territory, Puerto Rico Birth Certificates Issued on Or After July 1, 2010 <input type="checkbox"/> Consular Report of Birth Abroad of U.S. Citizen <input type="checkbox"/> Unexpired Foreign Passport with Valid U.S. Visa And Approved I-94 Form <input type="checkbox"/> Certificate of Naturalization or Certificate of U.S. Citizenship <input type="checkbox"/> Valid, unexpired I-551 Resident Alien / Permanent Resident Card <input type="checkbox"/> Valid, unexpired I-766 Employment Authorization Document Card <input type="checkbox"/> Valid REAL ID License or ID Card from A Compliant State, Additional Documentation of U.S. Citizenship or Lawful Status is Required <input type="checkbox"/> US Adoption Order w/Birth Information <input type="checkbox"/> Active or Retired Military ID / Common Access Card	<input type="checkbox"/> Any Document in The Previous Column <input type="checkbox"/> Social Security Card <input type="checkbox"/> Canadian Tribal Card <input type="checkbox"/> State Issued Driver License or ID Card That Has NOT Been Expired Over A Year <input type="checkbox"/> Court Order That Contains the Applicant's Date of Birth <input type="checkbox"/> Foreign Birth Certificate <input type="checkbox"/> Health Insurance Card <input type="checkbox"/> Marriage License or Certificate <input type="checkbox"/> Individual's Medical Records from A Doctor or A Hospital <input type="checkbox"/> Military Dependent Identification <input type="checkbox"/> Military Discharge or Separation Papers (DD214) <input type="checkbox"/> Gun Permit <input type="checkbox"/> Pilot's License <input type="checkbox"/> Certified School Record or Transcript <input type="checkbox"/> Photographic Government / Employer / School Identification Card <input type="checkbox"/> Vehicle Title (Must Be Issued 30 Days Prior To Application) <input type="checkbox"/> Welfare Card <input type="checkbox"/> Prison Release Document or Photographic Prison Identification Card <input type="checkbox"/> TWIC Card (Transportation Worker Identification Credential)	<input type="checkbox"/> U.S. Passport or Passport Card <input type="checkbox"/> Certified Copy Of U.S. Birth Certificate (Issued by A City, County, Or State Vital Statistics Office) <input type="checkbox"/> Certified Copy of Birth Certificate from A U.S. Territory, Puerto Rico Birth Certificates Issued on Or After July 1, 2010 <input type="checkbox"/> Consular Report of Birth Abroad of U.S. Citizen <input type="checkbox"/> Certificate of Naturalization or Citizenship of U.S. Visa And Approved I-94 Form <input type="checkbox"/> Certificate of U.S. Citizenship <input type="checkbox"/> Valid, unexpired I-551 Resident Alien / Permanent Resident Card <input type="checkbox"/> Unexpired Foreign Passport with Valid U.S. Visa And Approved I-94 Form <input type="checkbox"/> Refugee/Asylee I-94 Form <input type="checkbox"/> I-551 Resident Alien / Permanent Resident Card <input type="checkbox"/> I-766 Employment Authorization Document Card	<input type="checkbox"/> Adoption Documents That Contain the Legal Name as A Result of The Adoption <input type="checkbox"/> Court Certificate of Name Change Document That Contains the Legal Name Both Before and After the Name Change <input type="checkbox"/> Marriage Certificate <input type="checkbox"/> A Certificate, Declaration, Or Registration Document Verifying the Formation of a Civil Union or Domestic Partnership <input type="checkbox"/> Certified Divorce Decree, Dissolution of Marriage/Civil Union/Domestic Partnership Document That Contains the Legal Name as A Result of The Court Action <input type="checkbox"/> Amended Birth Certificate <input type="checkbox"/> Certificate of Naturalization/Certificate of Name Change <input type="checkbox"/> Certified Court Order That Contains All Previous and Current Names, And Date of Birth.	<input type="checkbox"/> SSN On Application Verified By SSA <input type="checkbox"/> Social Security Card (Not Metal) <input type="checkbox"/> W-2 Form <input type="checkbox"/> SSA-1099 Form <input type="checkbox"/> Non-SSA-1099 Form <input type="checkbox"/> Pay Stub <input type="checkbox"/> I Am Ineligible for A Social Security Number, A Letter from SSA Issued Within 90 Days Will Be Required	<input type="checkbox"/> Rental or Lease Agreement with The Signature of The Owner/Landlord and The Tenant/Resident <input type="checkbox"/> Deed or Title to Residential Real Property <input type="checkbox"/> Mortgage Document <input type="checkbox"/> Home Utility Bills (Including Cellular Phone) <input type="checkbox"/> Employment Documents <input type="checkbox"/> Insurance Documents, Including Medical, Dental, Vision, Life, Home, Rental and Vehicle <input type="checkbox"/> Government Issued Tax Document <input type="checkbox"/> Statement from A Financial Institution/Bank <input type="checkbox"/> Voter Registration Confirmation Letter or Postcard Issued by The Alaska Division of Elections <input type="checkbox"/> Proof of Payment of Resident Tuition at A Public Institution of Higher Education in Alaska <input type="checkbox"/> A Letter on Letterhead from A Homeless Shelter, Shelter for Abused Women, Nonprofit Entity, Faith-Based Organization, Employer or Government Agency Within the United States Attesting That the Applicant Resides in Alaska <input type="checkbox"/> Alaska Certificate of Vehicle Titles or Registration (Issued At Least 30 Days Prior To The Date of Application) <input type="checkbox"/> Change of Address Confirmation by The U.S.P.S. 1st Class Mail with Postmark (Mail May Be Handwritten) <input type="checkbox"/> Alaska Tribal Card (For Non-Standard Remote Alaska Addresses Only, Within the Tribal Area Indicated on The Card) <input type="checkbox"/> At DMV's Discretion Other Documents May Be Accepted. Please Contact 907-269-5551 For Assistance

**The Alaska DMV must electronically verify documents to determine validity and status before Issuance of an ID / Driver License For Renewals, you may be able to skip the office completely – Go to ALASKA.GOV/DMV to see if you are eligible!**

## Winter 2020 Regional Advisory Council Meeting Calendar

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Feb. 2	Feb. 3 <i>Window Opens</i>	Feb. 4 <b>BB — Naknek</b>	Feb. 5	Feb. 6	Feb. 7	Feb. 8
Feb. 9	Feb. 10	Feb. 11 <b>YKD — Bethel</b> <b>WI — Fairbanks</b>	Feb. 12	Feb. 13	Feb. 14	Feb. 15
Feb. 16	Feb. 17 <b>PRESIDENT'S DAY HOLIDAY</b>	Feb. 18	Feb. 19 <b>NS — Utqiagvik</b>	Feb. 20 <b>NWA — Kotzebue</b>	Feb. 21	Feb. 22
Feb. 23	Feb. 24	Feb. 25 <b>SE — Petersburg</b>	Feb. 26	Feb. 27 <b>KA — Kodiak</b>	Feb. 28	Feb. 29
Mar. 1	Mar. 2	Mar. 3 <b>EI — Fairbanks</b>	Mar. 4 <b>SC — Anchorage</b>	Mar. 5	Mar. 6	Mar. 7
Mar. 8	Mar. 9	Mar. 10	Mar. 11 <b>SP — Nome</b>	Mar. 12	Mar. 13 <i>Window Closes</i>	Mar. 14

## Fall 2020 Regional Advisory Council Meeting Calendar

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>Aug. 16</i>	<i>Aug. 17</i> <i>Window opens</i>	<i>Aug. 18</i>	<i>Aug. 19</i>	<i>Aug. 20</i>	<i>Aug. 21</i>	<i>Aug. 22</i>
<i>Aug. 23</i>	<i>Aug. 24</i>	<i>Aug. 25</i>	<i>Aug. 26</i>	<i>Aug. 27</i>	<i>Aug. 28</i>	<i>Aug. 29</i>
<i>Aug. 30</i>	<i>Aug. 31</i>	<i>Sep. 1</i>	<i>Sep. 2</i>	<i>Sep. 3</i>	<i>Sep. 4</i>	<i>Sep. 5</i>
<i>Sep. 6</i>	<i>Sep. 7</i> <b>LABOR DAY HOLIDAY</b>	<i>Sep. 8</i>	<i>Sep. 9</i>	<i>Sep. 10</i>	<i>Sep. 11</i>	<i>Sep. 12</i>
<i>Sep. 13</i>	<i>Sep. 14</i>	<i>Sep. 15</i>	<i>Sep. 16</i>	<i>Sep. 17</i>	<i>Sep. 18</i>	<i>Sep. 19</i>
<i>Sep. 20</i>	<i>Sep. 21</i>	<i>Sep. 22</i>	<i>Sep. 23</i>	<i>Sep. 24</i>	<i>Sep. 25</i>	<i>Sep. 26</i>
<i>Sep. 27</i>	<i>Sep. 28</i>	<i>Sep. 29</i>	<i>Sep. 30</i>	<i>Oct. 1</i>	<i>Oct. 2</i>	<i>Oct. 3</i>
<i>Oct. 4</i>	<i>Oct. 5</i>	<i>Oct. 6</i>	<i>Oct. 7</i>	<i>Oct. 8</i>	<i>Oct. 9</i>	<i>Oct. 10</i>
<i>Oct. 11</i>	<i>Oct. 12</i> <b>COLUMBUS DAY HOLIDAY</b>	<i>Oct. 13</i>	<i>Oct. 14</i>	<i>Oct. 15</i>	<i>Oct. 16</i>	<i>Oct. 17</i>
<i>Oct. 18</i>	<i>Oct. 19</i>	<i>Oct. 20</i>	<i>Oct. 21</i>	<i>Oct. 22</i>	<i>Oct. 23</i>	<i>Oct. 24</i>
<i>Oct. 25</i>	<i>Oct. 26</i>	<i>Oct. 27</i>	<i>Oct. 28</i>	<i>Oct. 29</i>	<i>Oct. 30</i>	<i>Oct. 31</i>
<i>Nov. 1</i>	<i>Nov. 2</i>	<i>Nov. 3</i>	<i>Nov. 4</i>	<i>Nov. 5</i>	<i>Nov. 6</i> <i>Window closes</i>	<i>Nov. 7</i>

## Subsistence Regional Advisory Council Correspondence Policy

The Federal Subsistence Board (Board) recognizes the value of the Regional Advisory Councils' role in the Federal Subsistence Management Program. The Board realizes that the Councils must interact with fish and wildlife resource agencies, organizations, and the public as part of their official duties, and that this interaction may include correspondence. Since the beginning of the Federal Subsistence Program, Regional Advisory Councils have prepared correspondence to entities other than the Board. Informally, Councils were asked to provide drafts of correspondence to the Office of Subsistence Management (OSM) for review prior to mailing. Recently, the Board was asked to clarify its position regarding Council correspondence. This policy is intended to formalize guidance from the Board to the Regional Advisory Councils in preparing correspondence.

The Board is mindful of its obligation to provide the Regional Advisory Councils with clear operating guidelines and policies, and has approved the correspondence policy set out below. The intent of the Regional Advisory Council correspondence policy is to ensure that Councils are able to correspond appropriately with other entities. In addition, the correspondence policy will assist Councils in directing their concerns to others most effectively and forestall any breach of department policy.

The Alaska National Interest Lands Conservation Act, Title VIII required the creation of Alaska's Subsistence Regional Advisory Councils to serve as advisors to the Secretary of the Interior and the Secretary of Agriculture and to provide meaningful local participation in the management of fish and wildlife resources on Federal public lands. Within the framework of Title VIII and the Federal Advisory Committee Act, Congress assigned specific powers and duties to the Regional Advisory Councils. These are also reflected in the Councils' charters. (Reference: ANILCA Title VIII §805, §808, and §810; Implementing regulations for Title VIII, 50 CFR 100 .11 and 36 CFR 242 .11; Implementing regulations for FACA, 41 CFR Part 102-3.70 and 3.75)

The Secretaries of Interior and Agriculture created the Federal Subsistence Board and delegated to it the responsibility for managing fish and wildlife resources on Federal public lands. The Board was also given the duty of establishing rules and procedures for the operation of the Regional Advisory Councils. The Office of Subsistence Management was established within the Federal Subsistence Management Program's lead agency, the U.S. Fish and Wildlife Service, to administer the Program. (Reference: 36 CFR Part 242 and 50 CFR Part 100 Subparts C and D)

### Policy

1. The subject matter of Council correspondence shall be limited to matters over which the Council has authority under §805(a)(3), §808, §810 of Title VIII, Subpart B §\_\_\_.11(c) of regulation, and as described in the Council charters.
2. Councils may, and are encouraged to, correspond directly with the Board. The Councils are advisors to the Board.
3. Councils are urged to also make use of the annual report process to bring matters to the Board's attention.

4. As a general rule, Councils discuss and agree upon proposed correspondence during a public meeting. Occasionally, a Council chair may be requested to write a letter when it is not feasible to wait until a public Council meeting. In such cases, the content of the letter shall be limited to the known position of the Council as discussed in previous Council meetings.
5. Except as noted in Items 6, 7, and 8 of this policy, Councils will transmit all correspondence to the Assistant Regional Director (ARD) of OSM for review prior to mailing. This includes, but is not limited to, letters of support, resolutions, letters offering comment or recommendations, and any other correspondence to any government agency or any tribal or private organization or individual.
  - a. Recognizing that such correspondence is the result of an official Council action and may be urgent, the ARD will respond in a timely manner.
  - b. Modifications identified as necessary by the ARD will be discussed with the Council chair. Councils will make the modifications before sending out the correspondence.
6. Councils may submit written comments requested by Federal land management agencies under ANILCA §810 or requested by regional Subsistence Resource Commissions (SRC) under §808 directly to the requesting agency. Section 808 correspondence includes comments and information solicited by the SRCs and notification of appointment by the Council to an SRC.
7. Councils may submit proposed regulatory changes or written comments regarding proposed regulatory changes affecting subsistence uses within their regions to the Alaska Board of Fisheries or the Alaska Board of Game directly. A copy of any comments or proposals will be forwarded to the ARD when the original is submitted.
8. Administrative correspondence such as letters of appreciation, requests for agency reports at Council meetings, and cover letters for meeting agendas will go through the Council's regional coordinator to the appropriate OSM division chief for review.
9. Councils will submit copies of all correspondence generated by and received by them to OSM to be filed in the administrative record system.
10. Except as noted in Items 6, 7, and 8, Councils or individual Council members acting on behalf of or as representative of the Council may not, through correspondence or any other means of communication, attempt to persuade any elected or appointed political officials, any government agency, or any tribal or private organization or individual to take a particular action on an issue. This does not prohibit Council members from acting in their capacity as private citizens or through other organizations with which they are affiliated.

Approved by the Federal Subsistence Board on June 15, 2004.





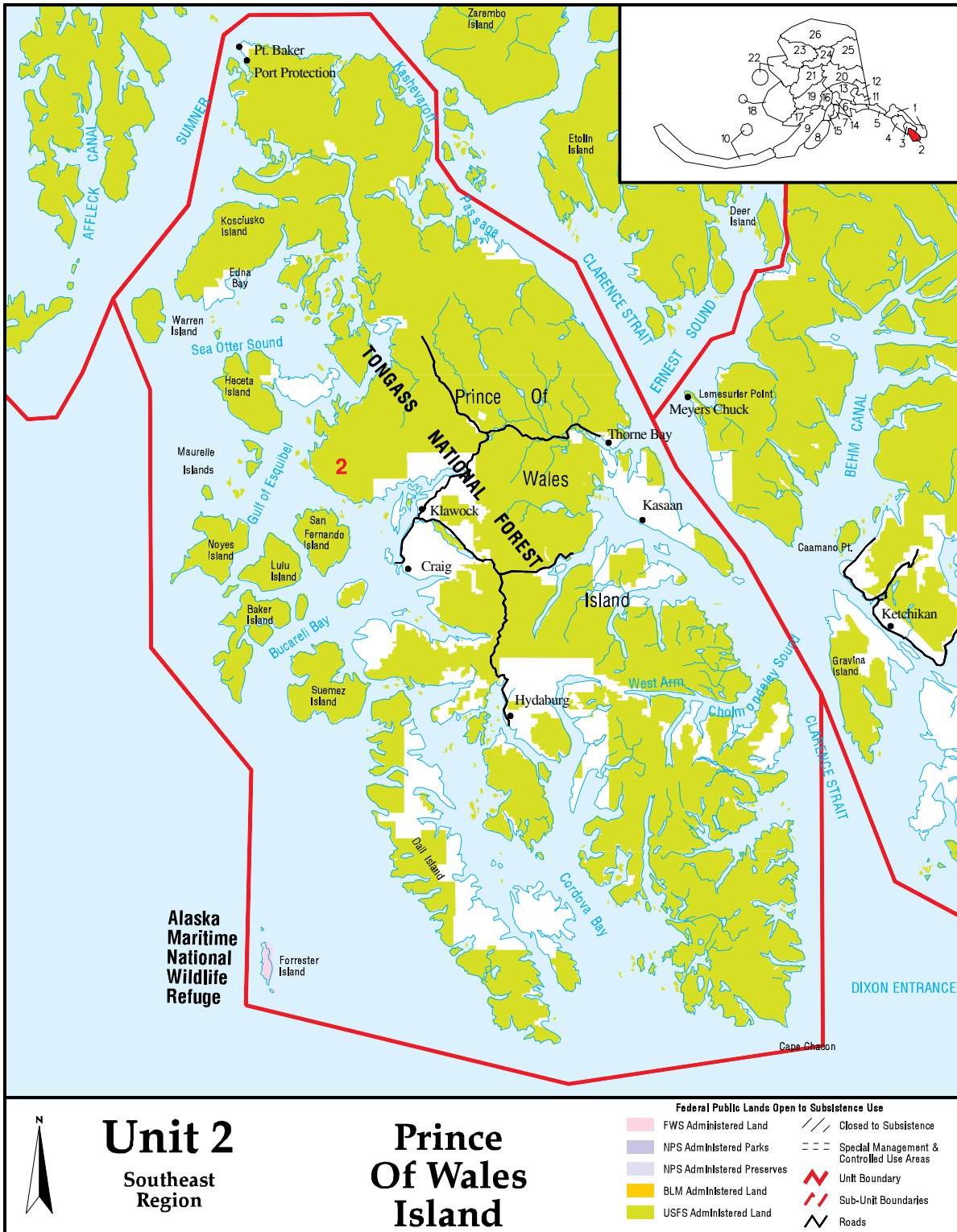
# Hunting / Unit I

# Southeast Mainland



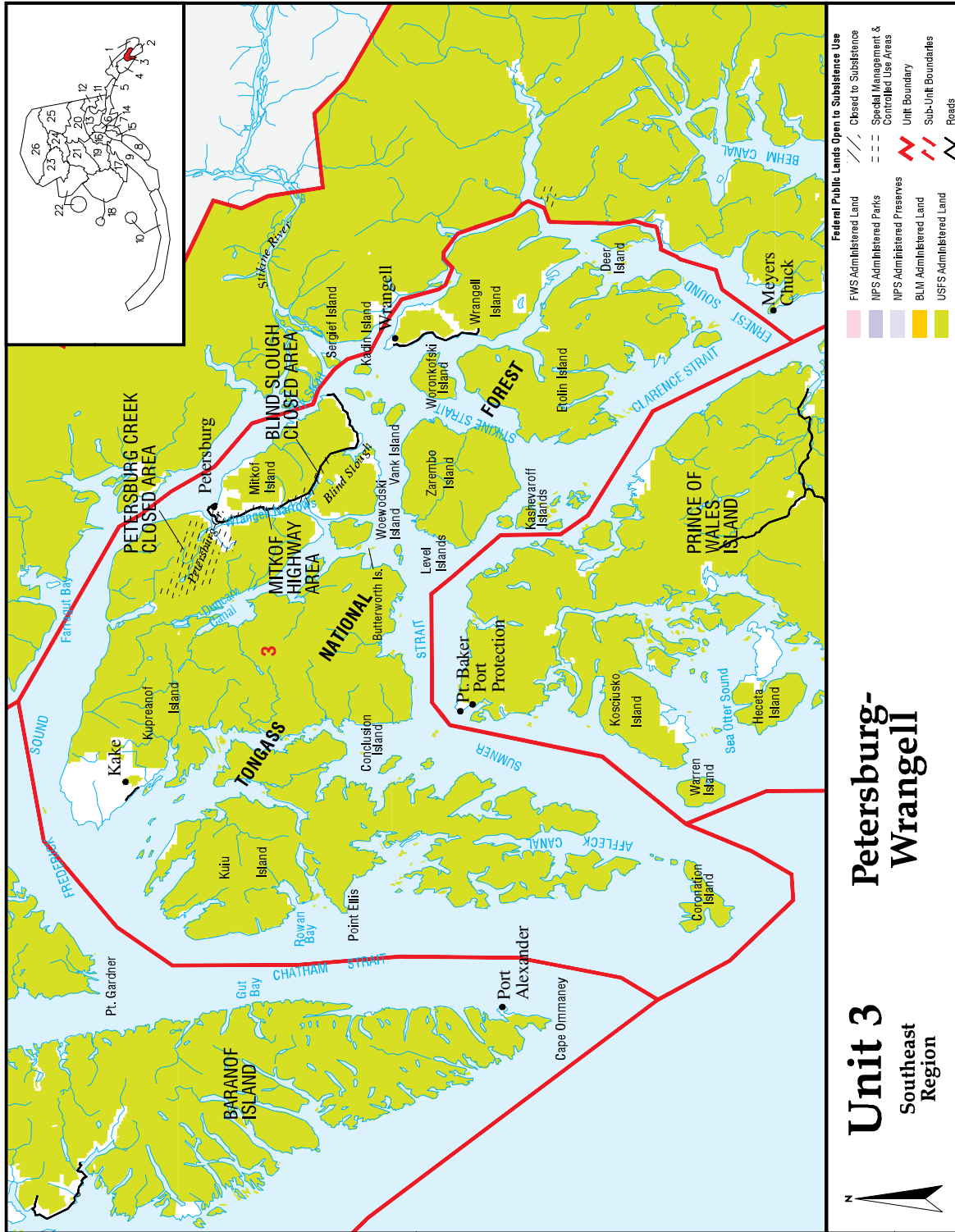
# Hunting / Unit 2

# Southeast Mainland



Petersburg-Wrangell

Unit 3 / Hunting



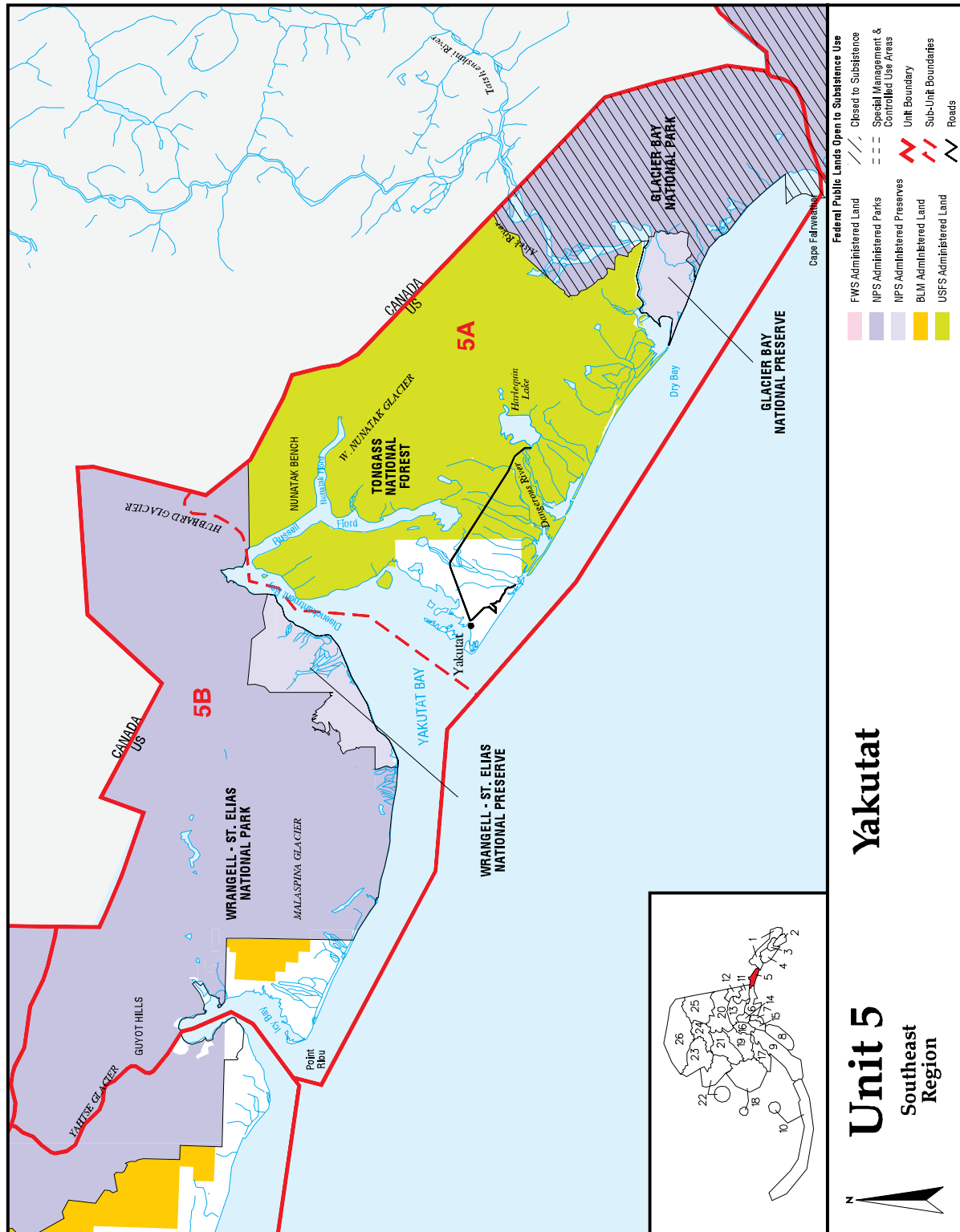
# Hunting / Unit 4

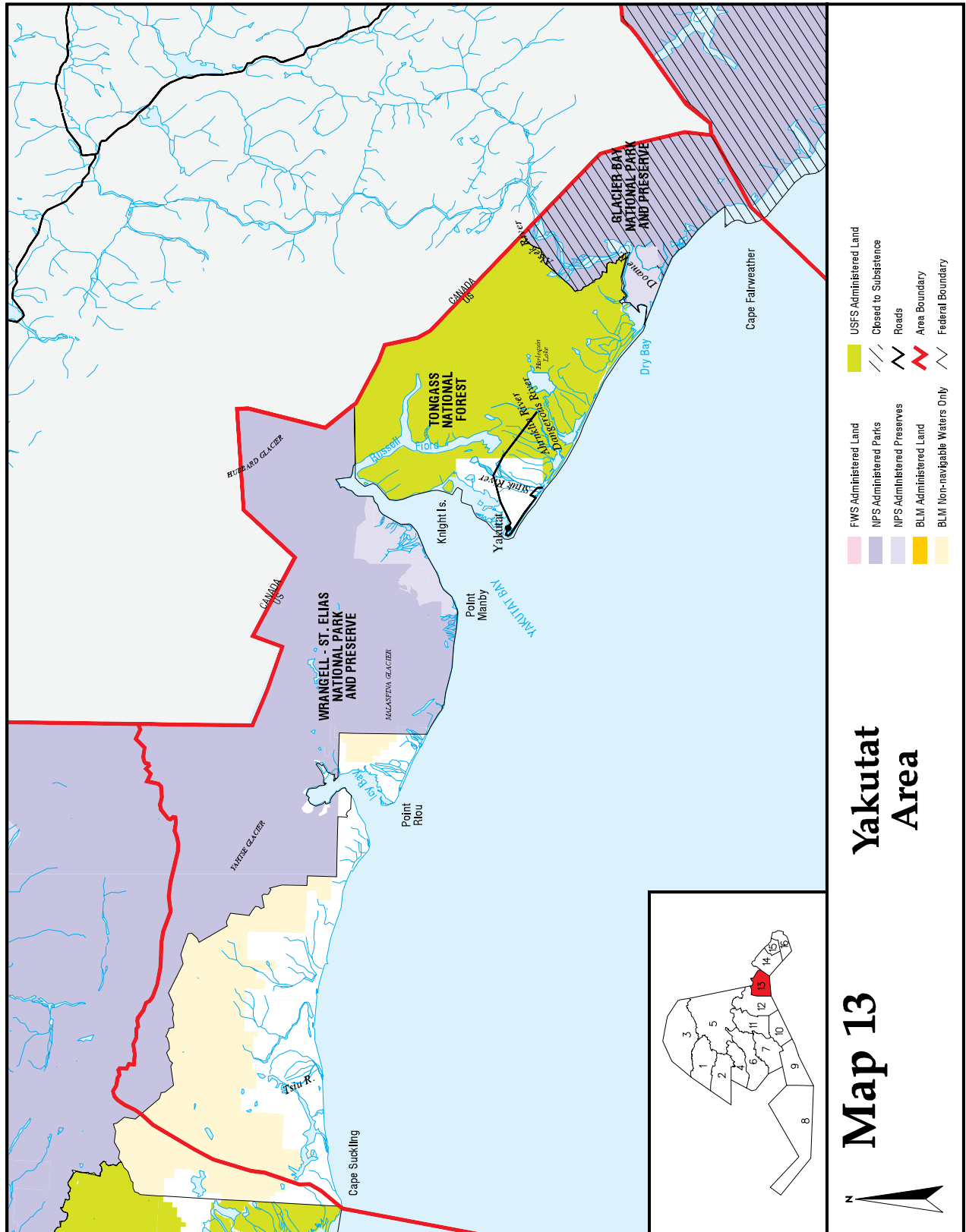
# Admiralty-Baranof-Chichagof

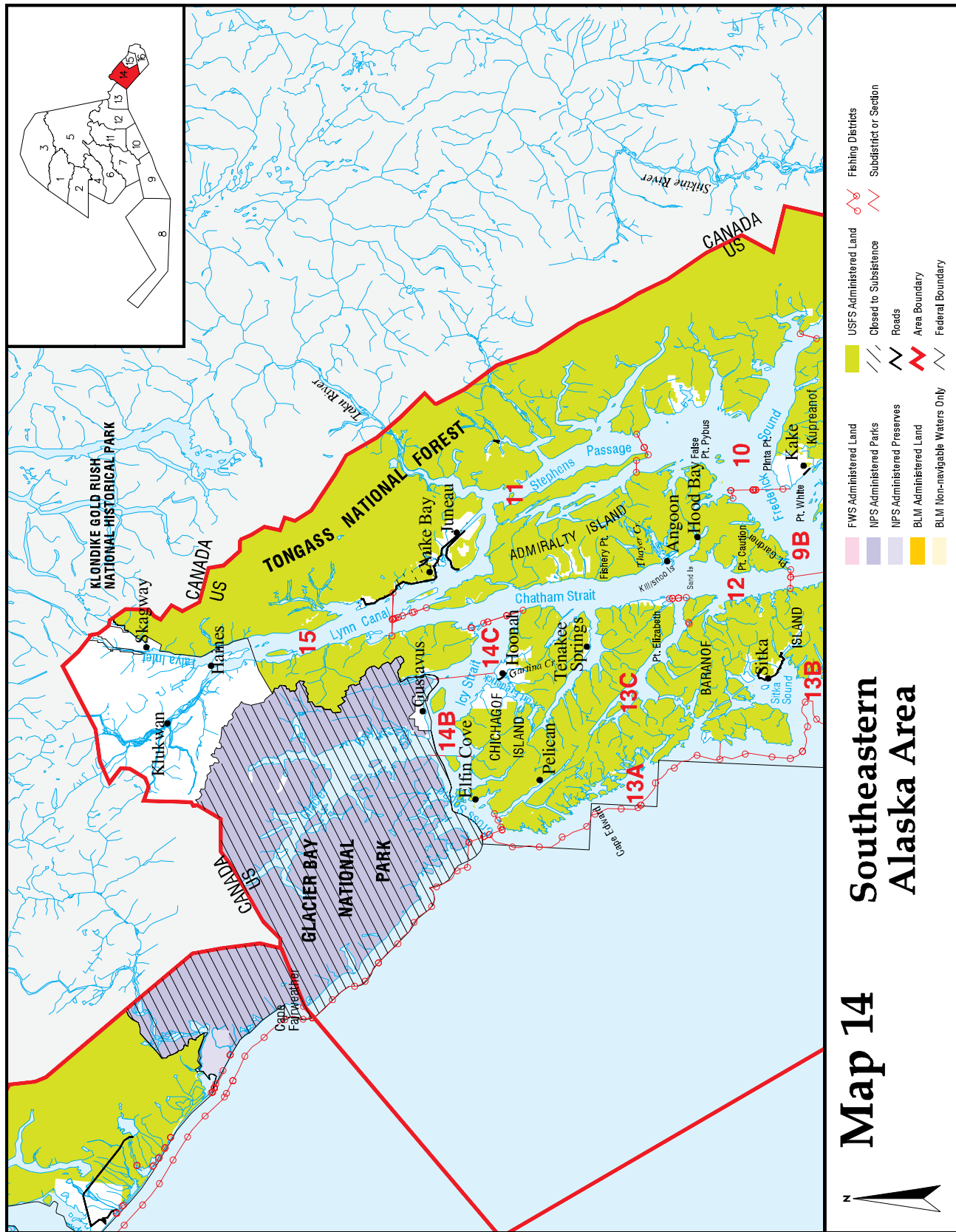


**Yakutat**

**Unit 5 / Hunting**

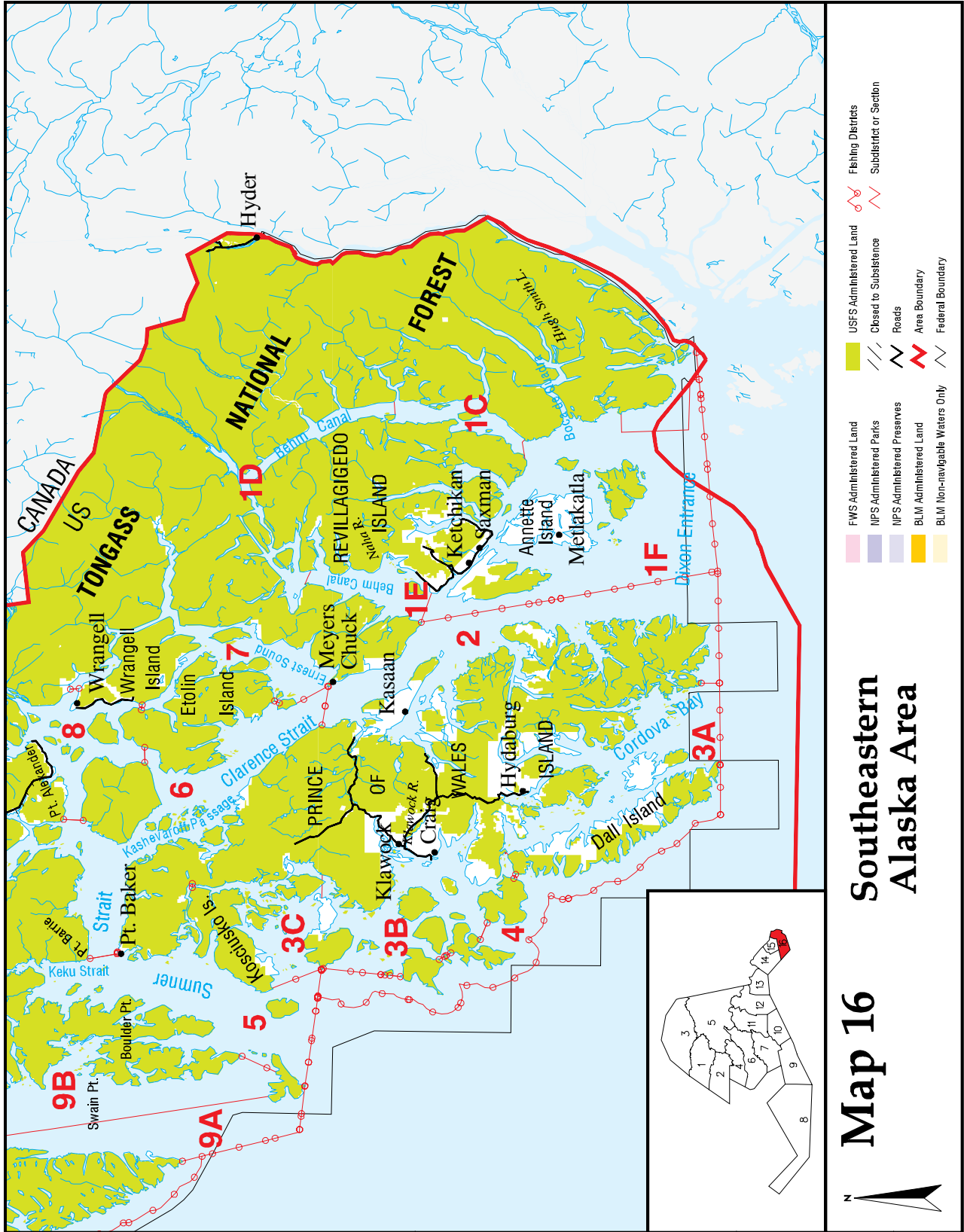












**Department of the Interior  
U. S. Fish and Wildlife Service**

**Southeast Alaska Subsistence Regional Advisory Council**

**Charter**

1. **Committee's Official Designation.** The Council's official designation is the Southeast Alaska Subsistence Regional Advisory Council (Council).
2. **Authority.** The Council is renewed by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. 3115 (1988)) Title VIII, and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is regulated by the Federal Advisory Committee Act (FACA), as amended, 5 U.S.C. Appendix 2.
3. **Objectives and Scope of Activities.** The objective of the Council is to provide a forum for the residents of the Region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the Region.
4. **Description of Duties.** Council duties and responsibilities, where applicable, are as follows:
  - a. Recommend the initiation, review, and evaluation of proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the Region.
  - b. Provide a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife on public lands within the Region.
  - c. Encourage local and regional participation in the decision-making process affecting the taking of fish and wildlife on the public lands within the region for subsistence uses.
  - d. Prepare an annual report to the Secretary containing the following:
    - (1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the Region;
    - (2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the Region;

- (3) A recommended strategy for the management of fish and wildlife populations within the Region to accommodate such subsistence uses and needs; and
  - (4) Recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.
- e. Appoint one member to the Wrangell-St. Elias National Park Subsistence Resource Commission in accordance with Section 808 of the ANILCA.
- f. Make recommendations on determinations of customary and traditional use of subsistence resources.
- g. Make recommendations on determinations of rural status.
- h. Provide recommendations on the establishment and membership of Federal local advisory committees.
- i. Provide recommendations for implementation of Secretary's Order 3347: Conservation Stewardship and Outdoor Recreation, and Secretary's Order 3356: Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories. Recommendations shall include, but are not limited to:
  - (1) Assessing and quantifying implementation of the Secretary's Orders, and recommendations to enhance and expand their implementation as identified;
  - (2) Policies and programs that:
    - (a) increase outdoor recreation opportunities for all Americans, with a focus on engaging youth, veterans, minorities, and other communities that traditionally have low participation in outdoor recreation;
    - (b) expand access for hunting and fishing on Bureau of Land Management, U.S. Fish and Wildlife Service, and National Park Service lands in a manner that respects the rights and privacy of the owners of non-public lands;
    - (c) increase energy, transmission, infrastructure, or other relevant projects while avoiding or minimizing potential negative impacts on wildlife; and
    - (d) create greater collaboration with states, tribes, and/or territories.
- j. Provide recommendations for implementation of the regulatory reform initiatives and policies specified in section 2 of Executive Order 13777: Reducing

Regulation and Controlling Regulatory Costs; Executive Order 12866: Regulatory Planning and Review, as amended; and section 6 of Executive Order 13563: Improving Regulation and Regulatory Review. Recommendations shall include, but are not limited to:

Identifying regulations for repeal, replacement, or modification considering, at a minimum, those regulations that:

- (1) eliminate jobs, or inhibit job creation;
- (2) are outdated, unnecessary, or ineffective;
- (3) impose costs that exceed benefits;
- (4) create a serious inconsistency or otherwise interfere with regulatory reform initiative and policies;
- (5) rely, in part or in whole, on data or methods that are not publicly available or insufficiently transparent to meet the standard for reproducibility; or
- (6) derive from or implement Executive Orders or other Presidential and Secretarial directives that have been subsequently rescinded or substantially modified.

At the conclusion of each meeting or shortly thereafter, provide a detailed recommendation meeting report, including meeting minutes, to the Designated Federal Officer (DFO).

5. **Agency or Official to Whom the Council Reports.** The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.
6. **Support.** The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.
7. **Estimated Annual Operating Costs and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$195,000, including all direct and indirect expenses and 1.15 staff years.
8. **Designated Federal Officer.** The DFO is the Subsistence Council Coordinator for the Region or such other Federal employee as may be designated by the Assistant Regional Director – Subsistence, Region 7, U.S. Fish and Wildlife Service. The DFO is a full-time Federal employee appointed in accordance with Agency procedures. The DFO will:
  - (a) Approve or call all of the advisory committee's and subcommittees' meetings;

- (b) Prepare and approve all meeting agendas;
  - (c) Attend all committee and subcommittee meetings;
  - (d) Adjourn any meeting when the DFO determines adjournment to be in the public interest; and
  - (e) Chair meetings when directed to do so by the official to whom the advisory committee reports.
9. **Estimated Number and Frequency of Meetings.** The Council will meet 1-2 times per year, and at such times as designated by the Federal Subsistence Board Chair or the DFO.
10. **Duration.** Continuing.
11. **Termination.** The Council will be inactive 2 years from the date the charter is filed, unless prior to that date it is renewed in accordance with the provisions of section 14 of the FACA. The Council will not meet or take any action without a valid current charter.
12. **Membership and Designation.** The Council's membership is composed of representative members as follows:

Thirteen members who are knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife and who are residents of the region represented by the Council.

To ensure that each Council represents a diversity of interests, the Federal Subsistence Board in their nomination recommendations to the Secretary will strive to ensure that nine of the members (70 percent) represent subsistence interests within the region and four of the members (30 percent) represent commercial and sport interests within the region. The portion of membership representing commercial and sport interests must include, where possible, at least one representative from the sport community and one representative from the commercial community.

The Secretary of the Interior will appoint members based on the recommendations from the Federal Subsistence Board and with the concurrence of the Secretary of Agriculture.

Members will be appointed for 3-year terms. A vacancy on the Council will be filled in the same manner in which the original appointment was made. Members serve at the discretion of the Secretary.

Council members will elect a Chair, Vice-Chair, and Secretary for a 1-year term.

Members of the Council will serve without compensation. However, while away from their homes or regular places of business, Council and subcommittee members engaged in Council, or subcommittee business, approved by the DFO, may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under section 5703 of title 5 of the United States Code.

- 13. **Ethics Responsibilities of Members.** No Council or subcommittee member will participate in any Council or subcommittee deliberations or votes relating to a specific party matter before the Department or its bureaus and offices including a lease, license, permit, contract, grant, claim, agreement, or litigation in which the member or the entity the member represents has a direct financial interest.
- 14. **Subcommittees.** Subject to the DFOs approval, subcommittees may be formed for the purpose of compiling information or conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO and the availability of resources.
- 15. **Recordkeeping.** Records of the Council, and formally and informally established subcommittees or other subgroups of the Council, shall be handled in accordance with General Records Schedule 6.2, and other approved Agency records disposition schedule. These records shall be available for public inspection and copying, subject to the Freedom of Information Act, 5 U.S.C. 552.



Secretary of the Interior

DEC 01 2017

Date Signed

DEC 04 2017

Date Filed



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