



SOUTHEAST ALASKA SUBSISTENCE
REGIONAL ADVISORY COUNCIL
Meeting Materials

October 31 - November 2, 2017
Juneau



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Black bear in Steep Creek, Mendenhall Glacier area of Southeast Alaska



Photo by DeAnna Perry

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SOUTHEAST ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL

Central Council Tlingit & Haida – Elizabeth Peratrovich Hall
320 W. Willoughby Ave., Conference Room #2
Juneau, Alaska

October 31 – November 2, 2017
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*)
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 - Council Member Reports
 - Chair’s Report
- 8. Service Awards**
 - Don Hernandez –15 years of service
 - Ken Jackson – 5 years of service
- 9. Public and Tribal Comment on Non-Agenda Items** (*available each morning*)
- 10. Old Business** (*Chair*)

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14. Closing Comments

15. 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, dlperry@fs.fed.us, or 800-877-8339 (TTY), by close of business on October 20, 2017.

REGION 1

Southeast Alaska Subsistence Regional Advisory Council

Seat	Year Appointed <i>Term Expires</i>	Member Name and Community
1	2015 2019	Steve K. Reifentstahl Sitka
2	2004 2019	Frank G. Wright Jr. Hoonah
3	1993 2019	Patricia A. Phillips Pelican
4	2000 2019	Michael A. Douville Craig
5	2002 2019	Harvey Kitka Sitka Secretary
6	2014 2017	Robert F. Schroeder Juneau
7	2014 2017	Albert H. Howard Angoon
8	2002 2017	Donald C. Hernandez Point Baker
9	2012 2018	Kenneth L. Jackson Kake
10	2015 2018	Raymond D. Sensmeier Yakutat
11	2010 2017	John A. Yeager Wrangell
12	2003 2018	Michael D. Bangs Petersburg Chair
13	2009 2018	Cathy A. Needham Juneau Vice Chair

MINUTES OF THE MARCH 14-16, 2017 SOUTHEAST ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL MEETING

Location of Meeting:

The Craig Tribal Association Hall, Craig, Alaska (Prince of Wales Island (POW))

Times and Dates of Meeting:

March 14	1:00 pm – 5:00 pm
March 15	8:30 am – 5:00 pm
March 16	9:00 am – 12:00 pm

Invocation for the meeting was given by council member, Harvey Kitka.

Call to Order: (*Acting Chair*)

The Fall 2016 meeting of the Southeast Alaska Subsistence Regional Advisory Council (“Council”) was called to order on Tuesday, March 14, 2017, at approximately 1:10 pm by Acting Chair, Cathy Needham. Due to the Chair being delayed by weather and not physically present, Vice-Chair Cathy Needham assumed the Chair duties to start the SEASRAC meeting. Secretary Harvey Kitka took roll call of all members attending in person and by teleconference and a quorum was established. Most Council members were present by attendance and phone for most of the meeting and a quorum remained throughout the meeting. The absences of Council members Kenneth Jackson and Ray Sensmeier were excused.

Review and Adopt Agenda:

The Council **approved a motion** to adopt the agenda as a guide (Secretary Kitka took roll call because several council members were on the phone as well as in the room); and the motion carried with nine votes, none opposing.

For all action items, a roll call was done to record council members’ votes, since at times, as many as six council members were participating by phone

Clinton Cook, on behalf of the Craig Tribal Association, welcomed Council members and the public to Craig and to ‘Indian Country,’ and explained that the meeting was being held on Indian land as Craig Tribe is the first in Alaska to put their Tribal lands into trust. Mr. Cooke provided opening comments on the tribal consultation process and federal priorities provided under Alaska National Interest Lands Conservation Act (ANILCA) and shared that the four Federally recognized tribes on the island look forward to meaningful consultation out of these meetings.

Matt Anderson, Craig District Ranger, United States Forest Service (USFS), also provided a welcome to the council and those attending the meeting on behalf of the local Forest Service

Ranger District. Mr. Anderson commented that the resources here are the lifeblood for everyone on the Island. He recognized local knowledge and agency knowledge of the island's resources and the hope is to blend local knowledge and the regulations to make sure they are managing the resources to the best benefit of everybody.

At the end of the first day, the Council recognized Millie Stevens, a leader of the community tribe. She was on the original Federal Subsistence Board (FSB) and she extended a welcome to Craig for the Council and wished everyone an enjoyable stay in Craig.

Attendees:

The following persons attended some portion of the Southeast Alaska Council meeting, either in person or by teleconference, in addition to the Council members:

Jennifer Hardin	Anchorage	OSM
Wayne Owen	Juneau	USFS
Tom Whitford	Anchorage	USFS – ISC
Melinda Hernandez-Burke	Juneau	USFS
DeAnna Perry	Juneau	USFS
Earl Stewart	Ketchikan	USFS
Terry Suminski	Sitka	USFS
Jeff Reeves	Craig	USFS
Susan Oehlers	Yakutat	USFS
Justin Koller	Sitka	USFS
Ryan Scott	Juneau	ADF&G
Tom Schumacher		ADF&G
Boyd Porter		ADF&G
Bruce Dale		ADF&G
Glenn Chen	Anchorage	BIA
Rosalie Debenham	Anchorage	BIA
Clarence Summers	Anchorage	NPS
Barbara Cellarius	Anchorage	NPS
Dan Sharp	Anchorage	BLM
Craig Schwatka		ADF&G
Clinton Cook	Craig	Craig Tribal Association
Tony Gallegos	Ketchikan	Ketchikan Indian Community
Louie Wagner, Jr.	Metlakatla	Metlakatla Indian Community
Cindy Wagner	Metlakatla	Metlakatla Indian Community
Michael Kampnich	Craig	
Jon Bolling	Craig	City of Craig Administrator
Luke Decker		USFS
Christopher Sakraida	Craig	USFS LEI
Dennis Nickerson	Klawock	Klawock Cooperative Association Tribe
Elijah Winrod	Klawock	
William Farmer	Craig	

Election of Officers:

The Council Coordinator opened the floor for nominations for the position of Chair for the Council and one nomination for Michael Bangs was given by Mr. Douville and seconded by Mr. Reifentstuhl. Mr. Bangs was elected as Chair of the SEASRAC, by a vote of nine in support, none opposing (4 absent).

The meeting was then turned over to the Acting Chair, who proceeded to hold elections for the positions of Vice-Chair and Secretary. Mr. Reifentstuhl nominated Cathy Needham for Vice-Chair, which was seconded by Mr. Douville. Ms. Needham was re-elected as Vice-Chair by a vote of nine in support, none opposing (4 absent). Mr. Reifentstuhl then nominated Harvey Kitka for Secretary, which was seconded by Mr. Douville. Mr. Kitka was re-elected as Secretary by a vote of eight in support, none opposing (5 absent).

Council Member Reports:

Mr. Reifentstuhl – Good news for his community of Sitka: they are seeing lots of age one and two herring and there are reports of lots of ones and twos in the bays near Sitka– these are the ones that are hard to know anything about because there is no sampling on these; local whale biologist believes that the humpback whales are at the top of their population; sablefish had been on a downturn in Southeast, but there has been prolific production in St. John the Baptist Bay and Silver Bay, and it appears they are on their way with an upturn. Bad news: Chinook stocks through SE AK are having a down turn and that will affect fishing throughout SE this year - Juneau derby has been cancelled and there will probably be a very low harvest quota for trollers, sports fishing, and charters because of downturn, not only of local stocks but there has also been a downturn in Washington state and Vancouver Island. There is a concern about deer population because of the extended winter this year. He recently saw a presentation by National Marine Fisheries Service on ocean acidification and would recommend that we invite the presenters to the fall meeting as the presentation would be informative for the council.

Mr. Frank Wright – Brown bears are already out in his community of Hoonah. There was a lot of deer hunting, he noticed many skiffs and deer being carried off the dock. In the past, they usually got about 100 king crab from pots, but this February, they had only about three this year, so something is going on. He has seen more whales than he's ever seen in the past, through the winter, and this is having an effect on herring and something should be done about that but they are protected. He has been trolling for salmon and hasn't done well with king salmon; others in community are also reporting salmon are all pretty small and hard to come by. The Hoonah Indian Association has a person doing shellfish toxic studies and there was community outreach about some areas more toxic than others. He doesn't know why sea lions are listed as 'endangered' because they are everywhere here and they have become a nuisance when trolling by grabbing fish on the line. Also problems with sea otters who have found the cockle beds and Dungeness crab spot in the area. Nothing can be done because this is within city limits so they can't shoot them and he doesn't believe city will do anything about this problem. Sea otters have

been observed eating tanner crabs which he hasn't seen before and this is having an impact on the tanner crab haul. Don't know what can be done about the sea otters, maybe change the law.

Ms. Patricia Phillips – Her community of Pelican has experienced big snow events this winter which may present a struggle for the deer; community relies on venison – important to their food security. Snow events then torrential rains result in flash flooding. Already seeing coho fingerlings coming out of the systems; have noticed humpback whale in the inlet all winter long – more evidence of changing climate systems.

Mr. Michael Douville – Wolf management is a concern for his community of Craig and many in the community do not have confidence that the science being used is giving the actual population trend and they do not think current science is adequate - it doesn't include local knowledge, and the harvest is being held artificially low. There are also deer harvest concerns, particularly in harvest of bucks; harvest is going up and is not an indication of population increase. Rut is lasting longer, now extending beyond mid-December, and this is probably an indication that there aren't enough bucks fertilizing females in a timely fashion. Longer ruts also result in bucks being in poorer health later. There is a herring concern in Craig, which has 'pounding.' In late 60s and early 70s, there was a wild harvest of 100 tons and after five or six years it was shut down because it was decimating the herring; he feels pounding is doing the same thing but in pounds. How much concern does there have to be before there is a meaningful solution?

Mr. Harvey Kitka – There is a concern for the herring population concern in his community of Sitka: the uncertainty of Fish & Game baselines, the size of the baseline area, and the health of the herring population in Sitka Sound. It is still on the road to recovery after the herring reduction plan went into place, never really seen it come back to where it was before that. Ongoing problems include population explosion of whales and sea lions in Sitka Sound and it is unknown what that will do to the population of herring. There is also concern about: warming temperatures making clam beds more toxic than usual, brown bears in the area coming out early, and the effect transboundary mining is having on main streams in Southeast.

Mr. Robert Schroeder – There have been closures on certain resources in his community of Juneau: closures for a number of years, people can't get shrimp because abundance isn't there, king crab has been closed up for quite a while for locals because there isn't abundance. Last year pretty marginal for Coho Salmon and this is changing around what people can do: people are able to do less and less in these areas and are not able to continue patterns of fishing and this effects what they are able to harvest. He has a major interest in climate change and encourages the council to be aware of certain things that affect the abundance of fish that we rely on, such as ocean acidification and temperature changes. Also, need to keep aware of the incremental changes that are happening, such as an increase in industrial tourism which puts more people out there in the resources, particularly in Juneau, and this is creating major competition with local residents. The Council is exemplary in doing its work and taking a strong stance when necessary and he hopes the council continues to improve its leadership on management issues, so that they are not only responding to management changes, but are initiating management direction.

Mr. Albert Howard – He is also concerned about the herring for his community of Angoon. He is seeing that the herring is an inch and a half to two inches long. Feels the council needs to figure out a way to take a position if the state isn't going to recognize the local traditional knowledge that something is wrong because the herring are the beginning of the food chain. Putting something in the environment that doesn't naturally exist can't have a positive impact on any of it. Deer population was good this year, but there is a concern now that current snowfall will be an impact next year. Angoon is 80% unemployed - they have found ways to survive and maintain themselves but a lot is based on traditional foods. He feels that unless they address issues sooner rather than later, it will become more and more difficult to live off the resources that communities have come to rely on, which are affected by decisions made somewhere else. Need to find a way to recognize local and traditional knowledge of the area and take an active role to find a solution. A lot of proposals were put through before that weren't recognized by the State, such as to keep commercial crabbing out of the bays of the area where the community traditionally got crab but proposals didn't make it so they are faced with less or no Dungeness crab in areas where they used to get what they needed. It is human nature to find a good spot for crab and dump all your gear and get all you can . . . but it shouldn't be at the cost of the community of Angoon.

Mr. Donald Hernandez – Mr. Hernandez was diligently trying to fly out of his home base at the time Member Reports were given and did not formally give his member report, but he did mention several concerns throughout discussions during the meeting, including: pending litigation and how it affects the planning process on POW (land trades); the level of development, roading, clear cutting, and access issues that have taken place in lower end of POW as it relates to people's ability to get deer; and small area of access for subsistence and non-subsistence hunters.

John Yeager – Reported that some main concerns in his community of Wrangell are transboundary river/mining - want to make sure to keep this on the council's radar; growing concern of designated hunter program – being addressed by Wrangell Advisory Committee (amount of hunters vs number of deer, believe there is potential problem on the horizon); rivers frozen, about 2.5 ft. of ice on Stikine, small run of eulachon made it up river, good indications that we've already seen them head up Stikine. They had a really good winter king fishery (commercial hand trollers, sport fishing), it is not uncommon for two to three king salmon to be caught in a few hours in the Wrangell area.

Cathy Needham – Council reports are important as it gives the council members and the audience background of the communities and provides an opportunity for the members to interact with people in their communities to talk about their concerns and things that are going on with respect to subsistence. Since her community of Juneau is a non-rural area, she usually provides a report from a more regional standpoint, such as climate change and transboundary issues. This time, she wanted to talk about the importance of our youth growing up in rural communities and in customary and traditional use practices. The Council does a lot of work in assuring that the future of subsistence resources are available, but we have a lot of youth in our rural communities that move to non-rural communities or out of state and she would like to keep in mind, as these young adults move out for jobs, schooling, or economic opportunities, that we still want these resources to be available to them. As the Council moves through its

proceedings, she would like the council to stop and think about those youth that have moved into non-rural communities and the continuation of subsistence opportunities and the youth's ability to partake in cultural things that are important to them.

Michael Bangs: Reporting for his community of Petersburg, he too is concerned about the designated hunter program and perceived abuses. Good king salmon fishing in immediate area but there is concern of return for spawning fish.

Chair's Report/805(c) Report (Michael Bangs): No issues or questions with the two SEASRAC fisheries proposals that went before the FSB in January, 2017. Board seemed pleased with the Council's rationale on both.

Review and Approve Previous Meeting Minutes:

The Council **approved a motion** to accept the October 4-6, 2017 Council meeting minutes as corrected, pursuant to recommendations by Steve Reifentuhl, Cathy Needham, and Don Hernandez. The original motion to approve the minutes was tabled before final vote, in consideration of those council members that were in transit to the meeting and could not offer comments or vote on the original motion to adopt. Later in the day, the motion was brought from the table and participating council members provided input and a roll call vote was taken, resulting in 10 votes to approve the meeting minutes, 3 absent.

Public and Tribal Comment on Non-Agenda Items:

Mr. Louie Wagner, Jr. of Metlakatla spoke regarding his concern with the continuing closure of the Eulachon harvest for all of District 1 when there is no concern north of Ketchikan. He is concerned about the continuing closure without the Forest Service monitoring the river and seeing the fish themselves. For past seven years the fish have been running on the river, but they are still being denied subsistence opportunity. Previously, they were allowed to subsist on these fish and had customary and traditional rights to harvest Eulachons and sell them anywhere, but that hasn't happened now for 12 years. He spoke in Washington DC recently about his concerns because it effects Metlakatla, Ketchikan, Saxman, Klawock, Craig, and Hydaburg. There were questions and comments between the Council, Mr. Wagner, and federal and state agencies, regarding these subjects:

- 1) Effort of the federal agencies for monitoring these fish and how it is being regulated;
- 2) Possibility of co-management, for subsistence people to talk to USFS and advise if more fish are in the river than before; test fishery possible?
- 3) Recognizing Traditional Ecological Knowledge (TEK) regarding a baseline of how much fish have been there and how often it has increased/decreased over time;
- 4) This has been an issue for about 20 years and has been brought before the council and the board, and to the state and there is still no resolution. Talked to the intent of ANILCA and the importance of Eulachon and Eulachon grease to indigenous people.

- 5) The potential for major mineral development on this system and if there is not good data on what exists on that system, we will not be able to show that there is an impact of potential mine spills, which are likely to occur.
- 6) Recent closure on the District, as of March 6, 2017, for 60 days unless further lifted. Forest Service methods and means of how it is trying to determine if presence is occurring have changed. What closure was based on, monitoring needed.
- 7) Losing local knowledge; failing the next generation because they are not teaching them like their grandfathers and grandmothers taught them.

Council member Robert Schroeder asked that this issue be added to the Annual Report.

Dennis Nickerson, Tribal Treasurer of Klawock Cooperative Association, addressed the Council and advised that the Association is submitting five proposals for the Wildlife Regulatory Cycle. These Proposals were read into the record:

- 1) Customary & Traditional Use Determination – Harvest Limits, Unit 2 Deer: Unit 2 Residents Only; Residents of Units 1A and 3 – Three Deer, none can be female; Open Season: Aug 8-Oct 15
- 2) Customary & Traditional Use Determination – Harvest Limits; Unit 2 Deer: Unit 2 Residents Only; Five Deer, none can be female; Open Season: Jul 24-Feb 7
- 3) Customary & Traditional Use Determination – Harvest Limits, Unit 2 Black Bear; All Rural Residents; Four bear, no more than one can be blue or glacier bear; Open Season: Aug 24-Jun 30
- 4) Designated Fishing - Unit 2 Sockeye Salmon – another federally qualified subsistence user may be designated to take fish on your behalf
- 5) Unit 2 Sockeye Salmon – Klawock River Drainage closure to use of seines and gillnets from Jul 1 – Jul 8, and Aug 24 – Aug 31; Harvest Limit: 30 per day and 90 per household annual limit

Discussion amongst the Council and Mr. Nickerson included:

- 1) Most sockeye salmon subsistence fishing (personal use) is done in state waters; Council could only address the small portion on federal waters; a big portion of what is being asked in proposals would have to go before the Board of Fish (BOF). (Tribe has separated out issues and have proposals ready to submit to BOF.)
- 2) Proposals can be accepted at RAC meetings or directly to OSM but will be held until the formal Call for Wildlife Proposals is posted in the Federal Register. Once the formal call is posted, OSM will populate all proposals that they have received into Regulations.gov.

Public Testimony

Elijah Winrod, of Klawock, spoke of his concern of the juvenile king salmon bycatch of dragnet fisheries north of the area and the commercial seine fishery waste of king salmon having a substantial negative impact. He would like to see this addressed, especially after hearing from some of his brothers in the industry that although there is catch and release, most king salmon released are dead and sink to the bottom.

Mr. Winrod also mentioned a developing issue that should be addressed: additional space should be provided in the guided sport fish log books for king salmon caught and lost to sea lions. He estimates an average loss of about 50% on the outside of Noyes and Baker Islands.

Presentation of Member Service Awards:

Anthony Christianson, as Chair and on behalf of the Federal Subsistence Board, honored Harvey Kitka and Don Hernandez. Each has given 15 years of service to the Southeast Regional Advisory Council. Mr. Christianson thanked these council members for their time and energy for important issues in the region such as subsistence and food security.

OLD BUSINESS:

Memorandum Of Understanding (MOU) between the Federal Subsistence Board and the State of Alaska

Jennifer Hardin, Anthropology Division Chief, OSM, provided an update on the Memorandum of Understanding between the FSB and State of Alaska. There are very few new developments since the presentation to the Council in its fall 2016 meeting. The draft MOU was presented to all regional councils in fall 2016, and feedback was solicited. Regional council comments were taken back to the working group putting together the draft. There were also comments from State of Alaska and State Fish & Game Advisory Committees. The working group is working on incorporating the comments received into a new draft MOU. Once comments are integrated, the revision will be presented to the FSB for their approval and depending on the timing of the completed version, the new draft may come back to the Council for comments

Fisheries Resource Monitoring Program (FRMP) Status Update

Jennifer Hardin also provided a status on the FRMP. A 2018 FRMP timeline document was provided to the Council which gave an overview of the program for the next funding call. The 2018 call was issued in November 23, 2016, and closed on Feb 20, 2017. Proposals are just now being received in OSM. Next step in process will be proposal review and ranking by the FRMP Technical Review Committee. That ranking process will occur between now and May. The ranked proposals will come in front of the Council during the next meeting cycle and comments from Council will be solicited on those rankings and proposals. The Interagency Staff Committee (ISC) will then receive the Council comments and the FRMP Technical Review Committee's rankings of proposals and the ISC will submit their comments. All comments from

the Council, ISC, and FRMP Technical Review Committee's rankings will be forwarded to the FSB for their recommendations. Final funding decision will be made in the OSM following the January 2018 FSB meeting.

Customary & Traditional (C&T) Use Update:

Jennifer Hardin thanked council for its interest in the C&T process. She referenced the June 2016 letter that was sent to the Council, in answer to its letters to the FSB. The framework for assessing C&T uses in the Federal Subsistence Management Program is contained in Federal Subsistence Regulations, Part B, and consists of eight factors that illustrate customary and traditional uses. The intention is to protect and identify subsistence uses rather than to limit them. When the Board considers C&T uses in the federal program and makes a determination, the overall intent is to identify and acknowledge those practices that make up the subsistence way of life in rural Alaska. It is assumed that C&T will be broad and inclusive. The eight factors included in the regulations do not consist of a checklist, they provide a framework only to facilitate a discussion on subsistence uses and those practices considered customary and traditional. All eight factors do not need to be present and the intent of framework is to allow for flexibility that provides for acknowledgement for variability across the state. Regional Advisory Councils have deference when it comes to C&T use determinations in the federal program. C&T is to identify and acknowledge practice.

When resources are abundant and no restrictions are necessary, then harvest by all qualified users is allowed on federal public lands (those authorized under state and federal regulations). In times of conservation concern or where there is increased competition for a resource, ANILCA provides for a priority for subsistence uses on federal public lands. This is where Section 804 comes into play.

If resources need to be restricted, board is authorized to prioritize subsistence uses over other uses, in a phased approach. In the last phase when subsistence harvest is to be limited, this is when a Section 804 process would happen. Board must look at all three criteria under Section 804 when it comes to restricting subsistence opportunities: The Board's intent, always, is to provide for the maximum amount of opportunity for the maximum number of users.

Council questions on this matter included:

- 1) Ways that the Council may move forward to get their C&T determinations in line with both their statement to the Federal Board and the Board policy just described.
- 2) Visiting rural residents (hunting in other places outside where they reside)
 - a. Someone could be doing something that seems C&T, hunting with relatives or extended family
 - b. Regulatory complexity – if someone wants to hunt elsewhere, they need to spend a few hours and consult the regulations first to see if they can legally hunt as a subsistence user
- 3) Suggestion by Council member Robert Schroeder that, as a council we might have two goals:

- a. Clearly protect subsistence uses and allow them to continue; and
 - b. Avoid unnecessary regulatory complexity
-
- 4) Discussion about how to break pattern and what mechanism might move this issue forward. Submitting a C&T proposal during wildlife cycle would be a good way to keep this moving. OSM does not develop proposals on its own as a matter of policy, but will work with council to develop them if they wish to proceed.
 - 5) Possibility of setting up a subsistence hunt for goats where it isn't; subsistence people haven't had a chance for a subsistence hunt before. Might want to set up a C&T for this on Baranof Island.
 - 6) Concern of C&T determinations pitting subsistence user against subsistence user. The Board's intent is always to maximize opportunity but it is a way to provide some opportunity when resources are limited.

Western Hemisphere Shorebird Network Update:

Susan Oehlers, United States Forest Service (USFS) Wildlife Biologist, provided an update from a matter brought up by council member Mr. Sensmeier at the last meeting. Mr. Sensmeier had asked for a letter of support for a nomination for Yakutat to be included in the Western Hemisphere Shorebird Network (WHSRN). This was brought initially to the community by the Forest Service, as they currently have a WHSRN site on the Chugach Forest in Cordova, and there was interest to add the Yakutat and Stikine sites to this network. Ms. Oehlers gave background of this matter: Information was shared with Yakutat residents and the Yakutat Tlingit Tribe supports a designation; information was brought to the city assembly and the assembly was opposed and drafted a non-code ordinance opposing nomination. The main concern for this opposition was that although nomination and program itself is through a non-profit and there is no regulatory authority, there was a concern that just by having this designation that it could lead to restrictions on traditional uses in future. Forest Service will not pursue designation because program is based on community support. At least 300,000 shorebirds have been documented, which is what qualifies the area for the program. Focus is on both protecting habit and protecting specific populations. Council felt it was important that the council member from Yakutat be present before any action should be taken.

Tongass Forest Plan Amendment Update:

Earl Stewart, Forest Supervisor of the Tongass National Forest, USFS, provided an update to the Council on the Tongass Forest Plan Amendment (Amendment). The final Record of Decision on the Amendment was finalized in January. Mr. Stewart provided history of the process for the Amendment since 2013 and explained that the direction from the Secretary of Agriculture was a transition from old growth to young growth harvesting on the Tongass National Forest. The Amendment basically seeks to allow for an annualized market demand need of about 46 million board feet a year and starts off effectively heavy on the old growth side and over about 16 years; transitions to a heavier percentage of young growth but seeks to maintain about 5 million board feet of old growth into the future.

Matt Anderson, Craig District Ranger, USFS, added that subsistence has been a key topic for the Landscape Level Analysis and there is effort in determining a management strategy focused on deer. They are also looking at a large volume of in-stream restoration, recognizing that sockeye salmon is a key subsistence issue on the island (POW), and they are trying to incorporate local knowledge in that planning effort.

Council discussion on this matter included:

- 1) Is this shift to second growth proportional to how old growth was cut; POW and Revillagiedo Island areas are probably most opportune at this time.
- 2) Concern that there wasn't a good representation of subsistence voices on the Tongass Advisory Committee; no one from the Council was chosen.
- 3) Intent of riparian beach and estuary fringe components in Amendment are specific to previously harvested areas – young growth specific.
- 4) Concern that there is no regulation for land allocated to corporations to mandate buffers along rivers for private lands.
- 5) Different perspective on Landscape Level Analysis from remote areas north (Pt Baker and Pt Protection), because they are truly subsistence-dependent communities. Response was that any proposals, comments or concerns from Pt Baker and Port Protection will be strongly considered.
- 6) Expressed desire for SEASRAC to be involved in the Section 810 Process (Subsistence and Land Use Decisions).
- 7) Concern about the significant impact that land transfers coming out of Tongass National Forest and lands no longer subject to Title VIII of ANILCA management and subsistence priorities.

Federal Subsistence Management of Wolves in the Southeast (SE) Region:

Jeff Reeves, Subsistence Fisheries Biologist, USFS, gave his presentation/handout on federal subsistence management of wolves in the Southeast Region. The presentation is a result of the request from the Council from its Fall 2016 meeting and provides an overview of wolf management and strategies. Wolf harvest is monitored by ADF&G through mandatory sealing requirements. Wolves are harvested primarily by federally qualified users in the management unit of their community.

Discussion among the Council and Mr. Koller and Jeff Reeves and Terry Suminski, all of USFS, included:

- 1) All wolves across the southern panhandle are considered to be Alexander Archipelago wolves, subject to the various actions that have taken place in recent years concerning ESA petitions.
- 2) Some federal and state regulations are out of sync; this would be the time to submit a proposal to sync those seasons with the state.
- 3) Increases in bear populations are a concern; it would probably take a proposal to change the current regulations to address this.

- 4) The 'Interagency Technical Team' which is referenced in the presentation – who are the members of this team.

Accompanying ADF&G Presentation on Wolves and Bears:

Ryan Scott, Regional Supervisor, Division of Wildlife Conservation, ADF&G, provided a PowerPoint presentation on wolves and bears. Highest densities historically have been on Prince of Wales in Units 2 & 3. ADF&G extended the wolf hunting season in a portion of Units 1A and 3 as part of the intensive management program. Trapping takes a majority of the wolves. He relayed information regarding the Endangered Species Act – petition to list the Alexander Archipelago Wolf. Decision in Dec 2015 deemed listing not warranted. History of wolf management in Unit 2 was given. Unit 2 Wolf Harvest this year: there was a total of 28 wolves sealed. 2016 quota was 22 wolves (20% of estimate) and this was reduced to 11 wolves for the quota. Mr. Scott spoke to the research being done on wolves, there has been an increase in the area they are working in, and currently about 57% of the game management unit is being sampled. Samples are being analyzed right now. Believes this was a successful research season.

Bruce Dale, Director of the Division of Wildlife Conservation, ADF&G, spoke to wolf management in Alaska and the lower 48, and gave a department level view on the wolf issue. He talked about the hunting and trapping opportunities, predator control, and the previous Endangered Species Act petition for listing (the population on Prince of Wales does not markedly differ genetically from other wolves). If ADF&G wants to write a wolf management plan that provides for abundant hunting and trapping, but a population that's kept at a level where it doesn't affect the deer population, he believes they will have to show and demonstrate that two of the reasons a species can be listed (over exploitation and failure of the current regulatory process to adequately protect the population), can be ruled out.

Tongass National Forest Wolf Habitat Report ("Report") was on the agenda, but wasn't completed by the date of the Council meeting. Wayne Owen, Regional Director of Wildlife, Fisheries, Ecology, Watershed, and Subsistence, USFS, having been briefed on the program, participated by telephone to answer questions on the Report. He commented that the Report was an outline of tools that can be used to manage habitat in the future: the population regulation is still the purview of the State. The Forest Service has not and does not intend at this moment to develop a plan for wolf management.

Discussion among the Council and ADF&G Staff included: the purpose of the Wolf Habitat Report – managing habitat that promote deer and wolves and is not a regulatory process, it doesn't restrict anything; the absence of subsistence staff representation on the agency Technical Team; history of wolf quotas across the state – predator control programs are designed to be temporary; hunters/trappers, through access and skill, regulate the wolf population at a level that would not affect the deer population inordinately and provide for abundance of both; what is pathway forward to have intensive management of wolves and not intensive management of hunters; data used in determining the 50% decrease in allowable take of wolves; and research being done on POW wolves.

Earl Stewart, Forest Supervisor for Tongass National Forest, further clarified that the technical team that worked on the Wolf Habitat Report were professionals from each of the agencies or entities offering their thoughts and suggestions of how to turn the overall collective information associated with the Alexander Archipelago wolf into a smaller land manager's guide. That guide is not a decision document; any project level effort would go through a full public process.

Public & Tribal Comments on Wolf Agenda Item:

Jon Bolling, City Administrator for the City of Craig reported that the City of Craig supports the higher sustainable harvest level possible of wolves in Game Unit 2. He relayed background information regarding wolf populations. The City of Craig made three points:

- 1) There has been a general increase in wolf populations;
- 2) Game managers are using anecdotal information to reduce the quota;
- 3) More public process is needed in setting future quotas.

Anthony Christianson, representing Hyدابurg Cooperative Association, stated that the lowering of the [wolf] quota has drastically impacted their ability to harvest deer, even with the extension. They had a hard time meeting their needs this year. Area should be managed like the rest of the State and those harvest limits should be liberal and open for those engaged at the local level to help feel like they're involved in that process and their words mean something. Contributing factors: hunting pressure has increased; access reduced; and ANCSA corporations not doing land management practices. Feeding themselves is their priority and they want to continue to work with local managers to find solutions so they can enjoy the resource in the future.

Brian Castle, speaking on behalf of Craig Fish & Game Advisory Board, stated that the Advisory Committee is concerned about how the wolves of POW are being managed and would like from the RAC, a number of wolves that could be used as a baseline. They are concerned about who will do wolf study and how it will be funded. He relayed some history about the wolves and harvest quotas from years past. Advisory Committee would like more local input.

Mike Douville, representing Craig Tribal Association, appealed to the Regional Forester to make tribal/government-to-government consultation happen when tribes are going to be affected by any decision the Forest Service is involved in. There is a concern of off road hunters having an impact on deer harvest. Where is the proof of illegal harvest that warrants a 50% deduction off the top? This year wolves weren't turned in until the 14 days were up; managed to get the quota this year but if it had been done like the previous year, they would not have. Local people need to be consulted as they live here and know better and sharing information needs to be reciprocated.

Michael Kamich, a 30+ year resident of Prince of Wales, represents the Nature Conservancy and participated for the state on hairboard study for last 3 years. Nature Conservancy believes heavily in research and sound documentation for appropriate sustainable management and must include local user groups, local entities, and local knowledge. Suggested a methodology like

commercial halibut quota – a ‘ten percent fudge factor,’ where you can go over or under ten percent a year and it’s either deducted or taken off the following year’s quota. Discussed types of research available. Mentioned the deer issue: combination of habitat issues, road issues, off-island hunters, and predation.

William Farmer of Craig, spoke of his concerns of the declining deer population on POW. Last year was the first time in 35 years that he wasn’t able to get the deer he needed. He supports access to the wolves back up to normal level. Would like trappers, people that need them and are going to utilize them, to deal with the wolves.

Elijah Winrod, a wolf trapper from Klawock, reiterated prior testimony that almost all of this year’s wolf quota was harvested from a few outer islands and a few taken from around Klawock based on a strategy to try to maintain some level of traditional use and management by local trappers. This is for self-preservation and to have some effect on a small portion of the deer population, using a degree of geographical isolation in conjunction with insufficient predator quota. There is a need for closer real two-way collaboration than has been seen in some ways recently to rebuild trust and achieve that [management] goal.

Federal Subsistence Management of Brown Bears in the SE Region:

Justin Koller, Zone Subsistence Biologist, USFS, summarized his presentation/handout on brown bears in the SE Region. Alaska is home to roughly 70% of brown bears in North America and research shows that the brown bear population in SE is healthy, having some of the highest densities of brown bear in the world. Brown bear population management consists of habitat and harvest management. Brown bear habitat management is guided by the Tongass Land and Resource Management Plan and harvest management is guided by the US Forest Service Shoreline Outfitter-Guide Management Plans for different regions and the Alaska Department of Fish and Game brown bear management strategies. Brown Bear harvest regulations are established by the State Board of Game and Federal Subsistence Board. There is likely very little or no subsistence harvest of brown bears in SE Alaska area and low level of subsistence harvest in the Yakutat area.

Mr. Kitka- question: Noting that the population is fairly healthy, we see that it has grown to the point where we can see that the bears are coming into our communities. It has always been known by our people that when the populations get too big, they would start walking amongst us. He questioned a comment from the presentation – Our people don’t take the meat for food of brown bear, only black bear and that is because of the bear clan that’s within our Tlingit people. He doesn’t like the regulation that you have to take the meat for that.

Mr. Koller responded that the current regulation does require salvage of meat and it would probably take a proposal to change that regulation.

Mr. Bangs shared that this is also occurring regarding black bears in his community – that most of the meat is salvaged and then they bring it into town and throw it in the dumpster; this is a common occurrence. They are noticing an increase of brown bear population on Mitkof Island

and it has become such a concern that proposals have been submitted to have a state hunt, but to no avail. Safety concern for residents.

Mr. Howard asked if there is anything in the permit process from prohibiting a big game hunter from taking deer while hunting bear. This seems to be an unintended consequence; anything that we can do so that people are not allowed to take any deer if you are hunting bear?

Mr. Suminski spoke that he believes Mr. Howard is speaking to the guides that are permitted by the Forest Service and is not sure there's anything to prevent those guided bear hunters from taking deer at the same time. He would have to check with the special use permit employees to be sure.

Ryan Scott, ADF&G, added that there isn't anything in state regulations that prevents the harvest of deer while folks are out brown bear hunting; however, the majority of guided brown bear hunting occurs in spring, so there is very little guided brown bear activity in the fall. His experience suggests that most guided deer hunting occurs later in the fall and into early winter. Mr. Howard wanted to know if there is anything in the process that can be changed so that, if you are participating in guided bear hunting for brown bear on Admiralty, you are not allowed to take deer off the island. Has heard that if someone takes a bear early, instead of the hunter sitting around, guides are offering that hunter can then hunt deer. There is a concern of the Tribe that there is competition between subsistence users and those who have the resources to do a guided brown bear hunt.

NEW BUSINESS:

WCR15-02 Moose Closure Review:

Susan Oehlers, Wildlife Biologist, USFS, provided a summary regarding the WCR 15-02 Moose Closure Review. There was a Closure Review document and analysis provided. Board decided in 2007, to conduct closure reviews every three years. Hunting on federal public lands in Unit 5A are closed to the hunting of moose except for the residents of Unit 5A. Adjusted moose population and bull/cow and cow/calf ratios for Unit 5A remain under state management objectives. OSM's recommendation for this closure is to keep status quo to maintain the subsistence use of moose.

Mr. Ryan Scott, ADF&G, stated that there was no immediate plan to change the state developed management plan from 1990, as far as objectives, but as additional information becomes available, it could be changed. They have entered a new phase of management strategies – working on operational planning and capturing what has happened over time. There is a portion Unit 5A that gets harvested quickly. The SE AK Moose management plan, worked on in 1991. The operational planning isn't the same as looking at a strategic plan for moose management, but it is intended to look at some of the objectives and things they can change and impact. His experience is that moose populations goes up and down quite a bit in the Yakutat area.

Mr. Scott responded to a question on whether this habitat could sustain 1000 moose, noting that when the habitat work had been done previously, that was a different time and this would need to be assessed.

The Council **approved a motion** to maintain the status quo (11 in favor, 2 absent). The Council chose to take the recommendation and justification of OSM and maintain the closure that is currently in regulation. Justification is that “current low populations numbers, bull-to-cow ratios, and calf-to-cow ratios remain below the State management objectives and the status quo of the wildlife closure is necessary to maintain subsistence use of moose on Federal public lands under Section .815(c) of ANILCA.”

Further discussion on the topic included:

- 1) It is believed that the residents of Unit 5 would probably support this closure as being necessary, due to high hunting pressure in the area.
- 2) This is a continuing situation; closure in effect for quite a while – possible need for justification to be revised on part of OSM as it states the population is low, etc. which suggests this is a temporary situation. Mr. Schroeder supports the closure but feels it is more of a continuing situation and wanted to make this comment.
- 3) This closure is already in regulations and will automatically be reviewed in another 3 years unless Council submits a proposal to take other action.

Call for Federal Wildlife Proposals:

Terry Suminski, Tongass National Forest Subsistence Work Program Leader, USFS, reminded the Council that the call for proposals to change Federal subsistence regulations is issued in January of odd-numbered years for wildlife, but this year, the call is on hold until the announcement can be published in the Federal Register.

The Council discussed putting together proposals to submit for the wildlife cycle as well as a Board of Fish Fisheries Proposal and working groups for each of the four wildlife issues and one fisheries issue were formed. These groups met Wednesday evening and crafted proposals to submit. These proposals were read into the record on the last day of the meeting and the

Council voted to submit the following proposals:

1) **Wolf Unit 3 Seasons Proposal:**

Extend the season end date of the Federal hunting season for wolf in Unit 3 to May 31 and move starting date of Federal trapping season for wolf in Unit 3 forward to November 1.

Rationale: Changing these dates will bring Federal regulations for wolf in these seasons into alignment with State regulations which are currently more liberal than Federal regulations. These changes positively affect Federally-qualified subsistence users by allowing opportunity currently unavailable under Federal regulations.

2) **Wolf Unit 2 Quota Proposal:**

Unit 2 Wolf: Harvest Limit - 5 wolves

The annual harvest of wolves in Unit 2 should not exceed 30% of the most recent unit-wide, preseason population estimate. Any wolf taken in Unit 2 must be sealed within 14 days of the harvest. Open season Sept 1 – Mar 31.

Rationale: The Council would like to provide for a more liberal take of wolves on Unit 2, to provide increased opportunities for federally qualified subsistence users and Council anticipates no conservation concern.

3) Customary and Traditional Use Determinations – Deer:

Units 1 through 5 would be open to Residents of Units 1, 2, 3, 4, and 5, for each unit.

Rationale: The existing C&T determinations are unclear and regulatory clarity will improve subsistence opportunity and management efficiency.

4) Reduce Bag limit for non-Federally-qualified users on POW for Deer:

Reduce the annual bag limit for non-federally qualified users in Unit 2 to two deer and reduce the season for non-federally qualified users by one week or more.

Rationale: To reduce the competition from non-subsistence users.

Call for State Board of Fisheries Proposals:

Terry Suminski, reminded the Council that there is a state call for fisheries proposals and the deadline for submission is April 11, 2017. The Council read two proposals, addressing the same issue, into the record on the last meeting day and **moved to submit them** to the State Board of Fish:

- 1) Nonresident Sport Fishing Annual Limit for Sockeye Salmon in SE AK – freshwater**
Amend language in 5 AAC 47.020 to provide for an annual limit for nonresidents to two times the daily bag limit for sockeye salmon in freshwater
- 2) Nonresident Sport Fishing Annual Limit for Sockeye Salmon in SE AK – saltwater**
Amend language in 5 AAC 47.020 to provide for an annual limit for nonresidents to two times the daily bag limit for sockeye salmon in saltwater.

FRMP Sockeye Monitoring Project Presentation:

Council member Cathy Needham and Mr. Anthony Christianson, of Hydaburg Cooperative Association, provided a report to the Council on the success of the Hetta Lake Subsistence Sockeye Salmon Assessment Project. In Southeast, sockeye were identified as a priority subsistence species within communities and it was acknowledged that data was needed in Hetta Inlet in order to manage in-season populations and have a better understanding of the structure of those populations to meet subsistence needs of the communities.

Hydaburg Cooperative Association became involved in this projects in 2001 and by 2010, became the principal investigator and took over the project completely; an exercise in building its local capacity to engage in local management. The project has created a lot of relationships across the board and feeds information to the system that helps managers make the best decisions while continuing to showcase to the public the importance of involvement in this process.

Approve FY2016 Annual Report:

The Council finalized the Annual Report after suggesting two additions and the Council **approved** the drafted Annual Report, with those edits.

The following issues were identified by the Council as important for the Board's consideration:\

1. Poor Returns of Sockeye Salmon

The Council is concerned about poor returns of Sockeye salmon throughout Southeast Alaska and feels there is a need to explore the causes of poor returns and find strategic ways to address those causes. The Council would appreciate information on the effects climate change is having on salmon returns.

2. Unguided Fishermen: Subsistence Users versus Other Users

Council members have noted an increase in "unguided fishermen" throughout Southeast Alaska. The Council has identified the need to address training of unguided fishermen on the environment and safety. There is also a need to address that the amount of fish that they take is not recorded. There are also takes from lodges (from non-resident fishermen) that are unaccountable and there are effects of those takes on subsistence users. This Council has made previous proposals to address this with Board of Fisheries which haven't been accepted (specifically Sockeye salmon) and the Council would like the Board to suggest a way forward to address this issue.

The Council would like to know if it is appropriate for the Board or the Office of Subsistence Management to request data from all user groups to make proper and informed decisions, specifically regarding unguided fishermen:

- Obtain lodge information from the State. How many lodges have unguided clients or guided clients vs unguided? Minimally, make inquiries of what information is available
- Request data on the group that stays in the bay at Kake from the Forest Service (FS). Only FS would know if they have a permit and there are concerns with amount of fish being taken.

3. Extraterritorial Jurisdiction Process

The Council remains interested in how the petition for extraterritorial jurisdiction for the marine waters in Chatham Strait is being resolved as the Alaska Board of Fisheries lowered the Amounts Necessary for Subsistence. The Council would like the Board to advise what avenues are available to work with the State on ensuring actions are taken within Council recommendations.

4. Outstanding National Resource Water Designation

The Council received a request for the Yakutat Forelands to be deemed an Outstanding National Resource Water Designation (ONRWD) as a Tier 3 area. This designation is provided by the

Environmental Protection Act, but it is up to the State Legislature to implement statutes that allow the State to adopt regulations to implement a Tier 3 designation. There are currently no State avenues to process nominations for this designation. The Council would like to request the Board to send a letter to the Secretaries of the Interior and Agriculture requesting that they communicate a request to the Governor of Alaska to seek legislation that would allow the Alaska Department of Environmental Conservation to pass regulations and move forward on a designation allowed in federal law.

5. Overpopulation of Bears

The Council feels it is imperative that the Board be aware of the increasing population of bears in Southeast Alaska. Bears have shown an increase in aggressive behavior recently which have resulted in more human-bear contact and, in some instances, maulings. It is the intention of the Council to obtain further information on this matter and to identify the causes of increased bear population so that the issue can be appropriately addressed.

6. Central SE Game Unit 3 issues with Deer Population & Bag Limits

The Council recognizes that there is a problem with the Sitka black-tail deer population and bag limits in Game Unit 3 and would seek the Board's support in identifying where subsistence needs are not being met in Unit 3 and a strategy to meet that need.

7. Wolf Management Plan Development for Unit 2

The Council encourages development of a Unit 2 wolf management plan to address federal management of wolves in the Prince of Wales area of Southeast Alaska. We envision a cooperative effort with ADF&G, USFWS, USFS, and Federal Subsistence scientists and managers and ask that the Board task the Office of Subsistence Management with bringing the right agencies together to work on a Unit 2 wolf management plan. Further, the Council requests that one or two Council members participate in the development of this plan.

8. Eulachon Harvest on the Unuk River

The Council is concerned about the closures affecting the Eulachon Harvest on the Unuk River. This issue has been presented to the Council and Board many times in the last 15-20 years. There is concern about the current monitoring process and how the closures of this harvest in the past several years have effected this subsistence opportunity. The Council would like to know if the Board could take special action to offer a test fishery, which could provide traditional ecological knowledge, as an effective tool to track the eulachon and get a better idea on escapement. The Council does not want to propose a harvest that might jeopardize the stock and is looking for avenues that will provide more information on the eulachon returns. This information is crucial when weighing the protection of a resource alongside protecting a way of life. The Council requests that the Board advise what options may be best to monitor / study the Unuk eulachon.

Lastly, the following issues are carried over from 2015, and the Council would like to build dialogue on these previously identified needs and issues:

1. Fisheries Resource Monitoring Program. Strategy of continued funding needs to be stressed.
2. Transboundary mining strategy.

3. Baseline water monitoring. Taku/Stikine have strategies, but need to address the issue of no access to Unuk river yet – USDA needs to facilitate monitoring.
4. Use of cabins on park lands for subsistence use.
5. Customary & Traditional Use. Presentations have been made and discussions heard, is it time for a proposal?
6. Terminal Area Escapement
7. Extraterritorial jurisdiction
8. Salmon and halibut interception. Amounts necessary for subsistence should be reviewed. This was brought up by Federal Subsistence Board in response under the petition for extraterritorial jurisdiction matter – why was Angoon amount lowered?
9. Sea Otter – continued issue of sea otters moving into interior waters of SE Alaska

USF&WS Alaska Native Relations Policy:

Jennifer Hardin reported that the national policy outlines the principles for interactions between the U.S. Fish and Wildlife Service and Federally recognized tribes, particularly as those relationships relate to shared interests in conservation. The Alaska Native Relations Policy gives guidance to Fish & Wildlife Service employees for their responsibilities and opportunities for relationships to tribes, Alaska Native organizations, and ANCSA corporations. The Policy also outlines opportunities for collaboration, for partnership, and to enhance the collaborative approach to conservation and resource management through the state. Next step is for the draft Alaska Native Relations Policy to be published in the Federal Register (when it is allowed) and open for public comment. No formal request for action, only that the Council to get this policy out to the communities and provide comments.

Agency Reports:

USFS:

Tom Whitford, Regional Subsistence Program Leader, USFS, gave a brief outline on the schedule of proposed actions and a breakdown of the budget. For those council members interested, the Council Coordinator can forward a link to the website for more details on the projects.

Special Actions Update:

Terry Suminski provided a summary of fish and wildlife special actions issued in the SE Region since the previous meeting. These included the closure of a zone for goats on Baranof Island, Unit 2 wolf closure, and Eulachon closure in District 1. There has recently been a special action request submitted to close the Stikine chinook federal subsistence fishery.

There was a reopening for goat harvest for a portion of the south Kalian zone on Baranof Island, which had been closed to goat hunting since 2011. Special action analysis will be done, along with a public meeting, to discuss the expanding goat population and the possibilities of modifying the management strategy to offer more opportunity for goat harvest in future.

NPS:

Barbara Cellarius, Subsistence Coordinator for Wrangell-St. Elias National Park and Preserve, NPS, gave an update on recent regulations finalized by the Park Service. These published Subsistence & Wildlife Collection Regulations allow federal subsistence users in Alaska to collect and use non-edible animal parts and plants for the making and selling of handicrafts.

BIA

Rosalie Debenham, Fish and Wildlife biologist, BIA, gave a brief report on some of the projects that the Bureau of Indian Affairs has worked on in SE Alaska this last year, including:

- Sitka Tribe of Alaska assessing the impacts of regional ocean acidification
- Central Council Tlingit and Haida working a project to develop climate change adaptation plans and a project to test and monitor water quality of SE's transboundary rivers
- Chilkoot Indian Association working on a project to identify climate vulnerabilities and adaptation strategies for local eulachon runs
- Petersburg Indian Association and Organized Village of Kake have Native youth crews working on eradication of invasive weeds
- Organized Village of Kasaan working a community fisheries project development

BIA has also been able to fund several internships across the state, providing meaningful paid work in fisheries, wildlife, and natural resource management for tribal youth.

OSM:

Jennifer Hardin provided Office of Subsistence Management staffing updates and status on the Nonrural Determination Policy. Council comments were integrated into the policy and the Board adopted that policy at its January 2017 meeting.

Future Meetings:

The Council **supported a motion** to confirm the Fall 2017 meeting dates of October 31 - Nov 2, 2017, in Juneau, and the Winter 2018 meeting dates of February 6-7-8, 2018, in Wrangell.

The Council also **supported a motion** to set the Fall 2018 meeting dates of Oct 9 – 11, 2018. Location to be selected at a future meeting.

Motion to Adjourn carried unanimously on March 16th, 2017, at mid-day.

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

/s/ DeAnna Perry
DeAnna Perry, DFO
USFS Subsistence Management Program

July 13, 2017

/s/ Cathy Needham, Vice Chair, for Michael Bangs
Michael D. Bangs, Chair
Southeast Alaska Subsistence Regional Advisory Council

July 13, 2017

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.

**REGULATION PROPOSAL FORM for the
ALASKA BOARD OF FISHERIES 2017-2018 MEETING CYCLE
P.O. BOX 115526, JUNEAU, ALASKA 99811-5526**

Proposals for this cycle are due April 11, 2017

**Indicates a required field*

BOARD OF FISHERIES REGULATIONS		
<input type="checkbox"/> Subsistence	<input type="checkbox"/> Personal Use	
<input checked="" type="checkbox"/> Sport	<input type="checkbox"/> Commercial	
*Which meeting would you like to submit your proposal to?		
<input type="checkbox"/> Prince William Sound Finfish	<input checked="" type="checkbox"/> Southeast & Yakutat Finfish & Shellfish	
<input type="checkbox"/> Statewide Dungeness Crab, Shrimp, and Other Miscellaneous Shellfish (Except Southeast & Yakutat)		
Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.		
1. Alaska Administrative Code Number 5 AAC <u>5 AAC 47.020</u>		
*2. What is the issue you would like the board to address and why?		
Abuses to sport fishing bag and possession limits by some nonresident anglers are well known. These behavior patterns by a few nonresidents are contributing to conservation issues on some streams that are difficult to quantify and address. One of the first pieces of information required to assess the impacts of nonresident anglers is to document the total harvest of salmon by this group. Personal Use and Subsistence fisheries for Chinook, silver, and sockeye salmon generally have annual limits that are recorded in the field on a harvest record. The mail-out harvest survey is inadequate for this type of accounting.		
*3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)		
(2) salmon, other than king salmon: may be taken from January 1 – December 31; no annual limit <u>for residents. The annual limit for nonresidents is two times the daily bag limit for sockeye salmon;</u> no size limit; . . . (continue with current text)		

***Submitted By:** Southeast Subsistence Regional Advisory Council
(DeAnna Perry – Council Coordinator)

Individual or Organization

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*Which meeting would you like to submit your proposal to?	
<input type="checkbox"/> Prince William Sound Finfish	<input checked="" type="checkbox"/> Southeast & Yakutat Finfish & Shellfish
<input type="checkbox"/> Statewide Dungeness Crab, Shrimp, and Other Miscellaneous Shellfish (Except Southeast & Yakutat)	

Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. **The board will reject multiple or confusing items.**

1. Alaska Administrative Code Number 5 AAC <u>5 AAC 47.022</u>

***2. What is the issue you would like the board to address and why?**
Abuses to sport fishing bag and possession limits by some nonresident anglers are well known. These behavior patterns by a few nonresidents are contributing to conservation issues on some streams that are difficult to quantify and address. One of the first pieces of information required to assess the impacts of nonresident anglers is to document the total harvest of salmon by this group. Personal Use and Subsistence fisheries for Chinook, silver, and sockeye salmon generally have annual limits that are recorded in the field on a harvest record. The mail-out harvest survey is inadequate for this type of accounting.

***3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

(b)(2) salmon, other than king salmon: may be taken from January 1 – December 31; no annual limit **for residents. The annual limit for nonresidents is two times the daily bag limit for sockeye salmon;** no size limit; . . . (continue with current text for remainder of section)

(c)(2) salmon, other than king salmon: may be taken from January 1 – December 31; no annual limit **for residents. The annual limit for nonresidents is two times the daily bag limit for sockeye salmon;** no size limit; . . . (continue with current text for remainder of section)

***Submitted By:** Southeast Subsistence Regional Advisory Council
(DeAnna Perry – Council Coordinator)

Individual or Organization

P.O. Box 21628	Juneau, Alaska	99802
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ALASKA BOARD OF GAME AGENDA CHANGE REQUEST POLICY

Because of the volume of proposed regulatory changes, time constraints, and budget considerations, the boards must limit their agendas. The boards attempt to give as much advance notice as possible on what schedule subjects will be open for proposals. The following regulations specify how the Board of Game considers agenda change requests (5 AAC 92.005):

5 AAC 92.005. Policy for changing board agenda. (a) The Board of Game (board) may change the board's schedule for considering proposed regulatory changes in response to an agenda change request, submitted on a form provided by the board, in accordance with the following guidelines:

(1) an agenda change request must be to consider a proposed regulatory change outside the board's published schedule and must specify the change proposed and the reason the proposed change should be considered out of sequence. An agenda change request is not intended to address proposals that could have been submitted by the deadline scheduled for submitting proposals.

(2) the board will accept an agenda change request only

- a. for a conservation purpose or reason;
- b. to correct an error in a regulation; or
- c. to correct an effect of a regulation that was unforeseen when a regulation was adopted;

(3) the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information that is found by the board to be compelling;

(4) a request must be received by the executive director of the boards support section at least 60 days before the first regularly scheduled meeting of that year;

(5) if one or more agenda change requests have been timely submitted, the board shall meet to review the requests within 30 days following the submittal deadline in subsection (4), and may meet telephonically for this purpose.

(b) The board may change the board's schedule for consideration of proposed regulatory changes as reasonably necessary for coordination of state regulatory actions with federal agencies, programs, or laws.

Note: The form in 5 AAC 92.005 is available on the Board of Game webpage at: www.adfg.alaska.gov/index.cfm?adfg=gameboard.forms or by contacting the Department of Fish and Game, Boards Support Section office (907) 465-4110.

Updated July 2015

5 AAC 96.625. JOINT BOARD PETITION POLICY

(a) Under AS 44.62.220, an interested person may petition an agency, including the Boards of Fisheries and Game, for the adoption, amendment, or repeal of a regulation. The petition must clearly and concisely state the substance or nature of the regulation, amendment, or repeal requested, the reason for the request, and must reference the agency's authority to take the requested action. Within 30 days after receiving a petition, a board will deny the petition in writing, or schedule the matter for public hearing under AS 44.62.190--44.62.210, which require that any agency publish legal notice describing the proposed change and solicit comment for 30 days before taking action. AS 44.62.230 also provides that if the petition is for an emergency regulation, and the agency finds that an emergency exists, the agency may submit the regulation to the lieutenant governor immediately after making the finding of emergency and putting the regulation into proper form.

(b) Fish and game regulations are adopted by the Alaska Board of Fisheries and the Alaska Board of Game. At least twice annually, the boards solicit regulation changes. Several hundred proposed changes are usually submitted to each board annually. The Department of Fish and Game compiles the proposals and mails them to all fish and game advisory committees, regional fish and game councils, and to over 500 other interested individuals.

(c) Copies of all proposals are available at local Department of Fish and Game offices. When the proposal books are available, the advisory committees and regional councils then hold public meetings in the communities and regions they represent, to gather local comment on the proposed changes. Finally, the boards convene public meetings, which have lasted as long as six weeks, taking department staff reports, public comment, and advisory committee and regional councils reports before voting in public session on the proposed changes.

(d) The public has come to rely on this regularly scheduled participatory process as the basis for changing fish and game regulations. Commercial fishermen, processors, guides, trappers, hunters, sport fishermen, subsistence fishermen, and others plan business and recreational ventures around the outcome of these public meetings.

(e) The Boards of Fisheries and Game recognize the importance of public participation in developing management regulations, and recognize that public reliance on the predictability of the normal board process is a critical element in regulatory changes. The boards find that petitions can detrimentally circumvent this process and that an adequate and more reasonable opportunity for public participation is provided by regularly scheduled meetings.

(f) The Boards of Fisheries and Game recognize that in rare instances circumstances may require regulatory changes outside the process described in (b) - (d) of this section. Except for petitions dealing with subsistence hunting or fishing, which will be evaluated on a case-by-case basis under the criteria in 5 AAC 96.615(a), it is the policy of the boards that a petition will be denied and not schedule for hearing unless the problem outlined in the petition justifies a finding of emergency. In accordance with state policy expressed in AS 44.62.270, emergencies will be held to a minimum and are rarely found to exist. In this section, an emergency is an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future. (Eff. 9/22/85, Register 95; am 8/17/91, Register 119; readopt 5/15/93, Register 126)

Authority: AS 16.05.251, AS 16.05.255, AS 16.05.258

**Resolution of the Alaska Board of Game
2015-208-BOG
Standing Delegation of Authority to the Commissioner Regarding Petitions for
Emergency Regulations**

The Board of Game (board) finds as follows:

1. The board will normally hold one to three regulatory meetings each year scheduled well in advance at which it will consider regulatory proposals on topics according to its three-year cycle.
2. The board supports, values, and encourages public input in the board's adoption of regulations during these regularly scheduled meetings.
3. From time to time, the board receives a petition for adoption of an emergency regulation submitted by a member of the public that, according to the proposal, needs to be addressed on an emergency basis under AS 44.62.250.
4. When such emergency petitions are received within 30 days before a regularly scheduled board meeting, the Board addresses the petition at the upcoming board meeting. When a petition is received more than 30 days before a regular meeting, the Board is required to address the petition outside of a meeting or hold a special meeting under AS 16.05.310 at the call of the commissioner or at least two board members.
5. To avoid the expense and inconvenience of holding a special board meeting every time a petition alleging an emergency is received outside the regular meeting schedule, the board wishes to delegate its authority to the Commissioner, as authorized by AS 16.05.270, to address such petitions to determine whether an emergency exists for purposes of convening a meeting of the board, as further described below.
6. As set forth in 5 AAC 96.625(f), it is an established board policy to recognize that in rare instances circumstances may require regulatory changes outside a regularly scheduled meeting. A petition will be denied and not scheduled for a hearing unless the commissioner finds the alleged problem outlined in the petition justifies a finding of emergency. Emergencies will be held to a minimum and are rarely found to exist.
7. An emergency, for purposes of 5 AAC 96.625(f) , "is an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly


burdensome to the petitioners because the resource would be unavailable in the future.”

THEREFORE THE BOARD RESOLVES and makes the following delegation of its authority to the Commissioner of the Department of Fish and Game pursuant to AS 16.05.270:

1. Each petition received by the board for an emergency regulation submitted more than 30 days before a regularly scheduled meeting of the board, shall be forwarded by the executive director to the commissioner. The commissioner is delegated the authority under AS 16.05.270 to determine whether the facts presented by the petition constitute an emergency pursuant to the standards set forth in 5 AAC 96.625(f).
2. The Commissioner may rely on relevant information, including information provided from the petitioner and from the Department of Fish and Game.
3. If the Commissioner does not find that an emergency exists, the commissioner shall deny the petition in writing as required by AS 44.62.230.
4. If the Commissioner finds that the problem outlined in the petition justifies a finding of emergency, the Commissioner will call a special meeting of the board under the Commissioner’s authority under AS 16.05.310.
5. At a special meeting called by the commissioner, the board retains the authority to review the petition and make an independent determination as to whether an emergency exists, and what, if any, regulatory action may be desired.
6. This delegation does not preclude two or more members from calling a special meeting of the board at any time for any purpose pursuant to AS 16.05.310.
7. This delegation shall remain in effect until revoked by the board.

Adopted February 20, 2015:

Vote: 6-1


Ted Spraker, Chair
Alaska Board of Game

2013-34-JB

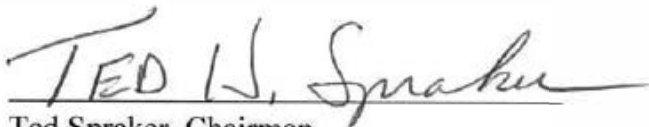
ALASKA JOINT BOARDS OF FISHERIES AND GAME

CRITERIA FOR DEVELOPMENT OF BOARD-GENERATED PROPOSAL

It has been suggested that criteria need to be established to guide the Alaska Joint Boards of Fisheries and Game, Board of Fisheries, and Board of Game (boards) members when deliberating on whether or not to develop a board-generated proposal. The boards will consider the following criteria when deliberating the proposed development and scheduling of a board-generated proposal:

1. Is it in the public's best interest (e.g., access to resource, consistent intent, public process)?
2. Is there urgency in considering the issue (e.g., potential for fish and wildlife objectives not being met or sustainability in question)?
3. Are current processes insufficient to bring the subject to the board's attention (e.g., reconsideration policy, normal cycle proposal submittal, ACRs, petitions)?
4. Will there be reasonable and adequate opportunity for public comment (e.g., how far do affected users have to travel to participate, amount of time for affected users to respond)?

Findings adopted this 16th day of October 2013.



Ted Spraker, Chairman

Alaska Board of Game

Vote: 6-0



Karl Johnstone, Chairman

Alaska Board of Fisheries

Vote: 7-0

SUBSISTENCE PROPOSAL POLICY

5 AAC 96.615. Subsistence proposal policy

(a) It is the policy of the Boards of Fisheries and Game to consider subsistence proposals for topics that are not covered by the notice soliciting proposals under 5 AAC 96.610(a) . To be considered by a board, a subsistence proposal must be timely submitted under 5 AAC 96.610(a), and

(1) the proposal must address a fish or game population that has not previously been considered by the board for identification as a population customarily and traditionally used for subsistence under AS 16.05.258 ; or

(2) the circumstances of the proposal otherwise must require expedited consideration by the board, such as where the proposal is the result of a court decision or is the subject of federal administrative action that might impact state game management authority.

(b) A board may delegate authority to a review committee, consisting of members of the board, to review all subsistence proposals for any meeting to determine whether the conditions in (a) of this section apply.

(c) A board may decline to act on a subsistence proposal for any reason, including the following:

(1) the board has previously considered the same issue and there is no substantial new evidence warranting reconsideration; or

(2) board action on the proposal would affect other subsistence users who have not had a reasonable opportunity to address the board on the matter.

History: Eff. 8/17/91, Register 119; readopt 5/15/93, Register 126

Authority: AS 16.05.251, AS 16.05.255, AS 16.05.258



Forest Service
Tongass National Forest
Alaska Region

648 Mission Street
Ketchikan, AK 99901
907-225-3101

File Code: 2600
Date: March 31, 2017

Mr. Michael Bangs
Chairman, Southeast Alaska Subsistence Regional Advisory Council
P.O. Box 21628
Juneau, Alaska 99802

Dear Chairman Bangs,

I am pleased to announce that the Technical Team has completed management recommendations for the Alexander Archipelago Wolf in Unit 2. The final report is attached. I hope you find it informative.

An interagency technical team consisting of members from ADF&G, USFS and the USFWS have been meeting since March 2016 with the objective of addressing the Forest Plan standard to develop and implement a Wolf Habitat Management Program for Unit 2, where wolf mortality concerns have been identified.

As per standards and guidelines in the Forest Plan and key components of wolf management in Unit 2, the Program provides recommendations for deer habitat management, road management, wolf management and mortality, den management, and human dimensions. The latter of these includes stakeholder input processes which consider public attitudes toward wolves and wolf management within Unit 2.

In closing, I wish to express my appreciation to you and the Southeast Alaska Subsistence Regional Advisory Council for their continued diligence and involvement in wolf management in Unit 2.

Sincerely,

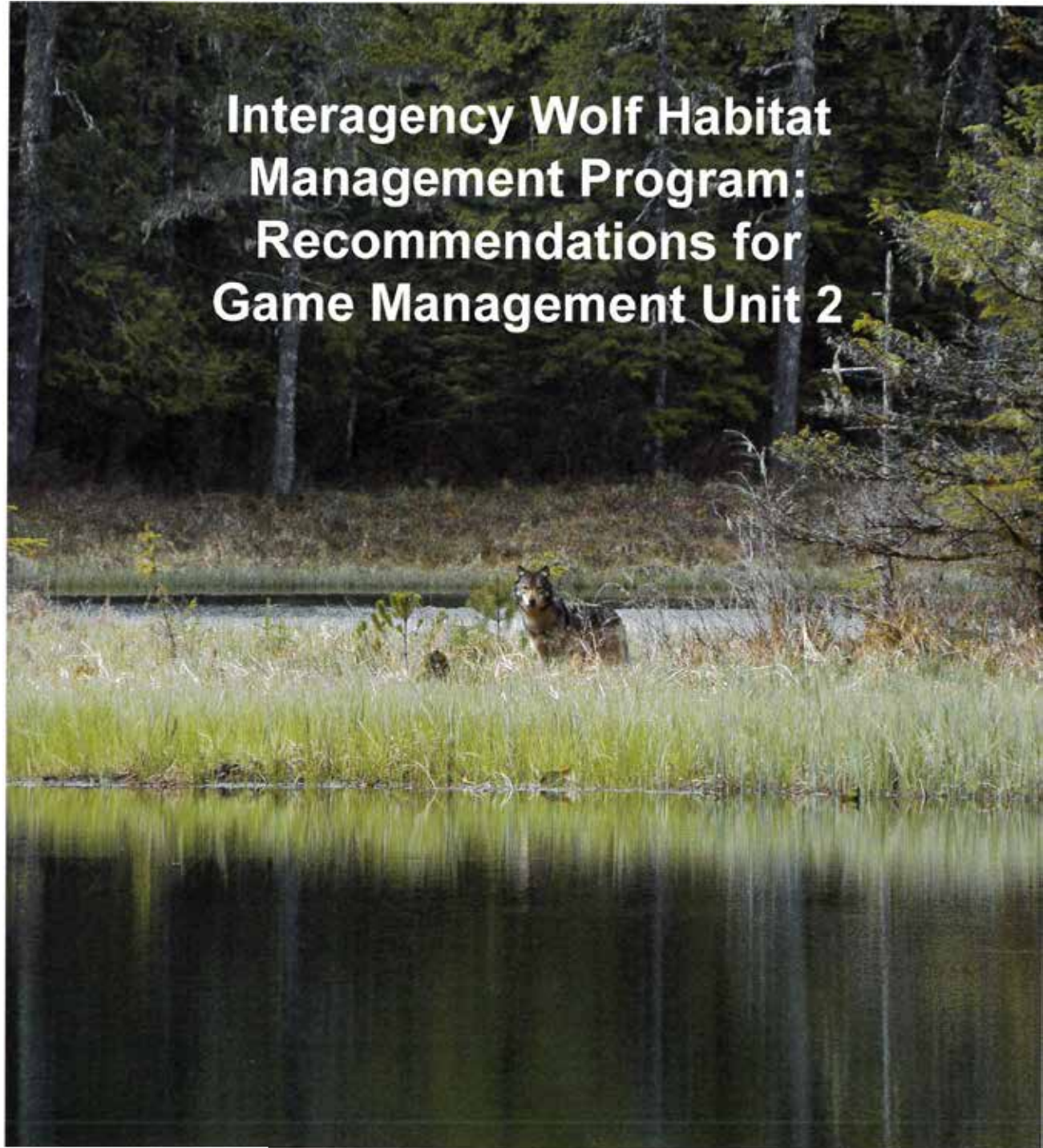
A handwritten signature in blue ink, reading "M. Earl Stewart". The signature is written in a cursive, flowing style. The first letter "M" is large and prominent, followed by "Earl" and "Stewart" in a similar cursive script.

M. EARL STEWART
Forest Supervisor, Tongass NF

cc: DeAnna Perry, Council Coordinator, USFS; Wayne Owen, Director, FWES, USFS; Eugene R. Peltola, Jr., Assistant Regional Director



United States Department of Agriculture



Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2



Forest Service
Alaska Region



U.S. Fish &
Wildlife Service



Alaska Department
of Fish and Game

R10-MB-822
March 2017

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Introduction

Since 1997, the U.S. Forest Service (USFS) Tongass National Forest Land and Resource Management Plan (Forest Plan; amended 2016) has included standards and guidelines to assist in maintaining long-term, sustainable wolf populations. Among these is a standard to develop and implement an interagency Wolf Habitat Management Program in cooperation with the Alaska Department of Fish and Game (ADF&G) and U.S. Fish and Wildlife Service (USFWS), where wolf mortality concerns have been identified. Specific measures addressed in the Forest Plan include: a) working with the ADF&G and USFWS to identify probable sources of mortality and examine the relationships among wolf mortality, human access, and hunter/trapper harvest; b) incorporating interagency analyses on road access and associated human-caused mortality into travel management planning and hunting/trapping regulatory planning; and c) integrating the Wolf Habitat Management Program, including road access management, with season and harvest limit proposals.

Wolf mortality concerns have been identified several times within northcentral Prince of Wales Island (POW) and the encompassing Game Management Unit 2 (GMU 2; Unit 2 under Federal regulations), which includes POW and nearby islands (Figure 1). For example, unsustainable harvest rates have been documented in portions of the area by Person and Russell (2008) and Person and Logan (2012). The effects of these unsustainable harvests are reflected in an apparent progressively declining wolf population for GMU 2 since the mid-1990s. Based on estimates using different methods, fall wolf population densities in northcentral POW declined from an estimated 39.5 wolves/1,000 kilometers² (km) in 1994 (Person et al. 1996) to more recent estimates of 24.5 ± 6.8 wolves/1,000 km² in 2013 and 9.9 ± 3.0 wolves/1,000 km² in 2014 (Roffler et al. 2016a), with a slight increase to 11.9 ± 2.7 wolves/1,000 km² in 2015 (Roffler 2016).

Petitions to list the Alexander Archipelago wolf and the GMU 2 wolf population as threatened or endangered under the Endangered Species Act were filed with the USFWS in 1993 and 2011. Concerns listed by petitioners included high harvest followed by declining harvest, a rapidly expanding road network that allowed increased potential for harvest, and an anticipated decline in prey abundance. Although listing was found to be not warranted at the time, concerns about the sustainability of the GMU 2 wolf population were indicated (FR 32473 1/5/16, USFWS 2015). The finding considered a population model for GMU 2 that predicted additional wolf population declines of 5 to 20 percent over the next 30 years, primarily driven by predicted declines in deer habitat capability, and therefore deer abundance, due to forest management (Gilbert et al. 2015).

The 2016 amended Forest Plan facilitates a transition from harvesting old-growth forest to predominantly harvesting young-growth forest. After the USFWS decision in 2016 that listing was not warranted, and based on continued GMU 2 wolf population concerns, USFS leadership within the Tongass National Forest and Alaska Region directed staff to proceed with developing the Wolf Habitat Management Program and wolf management recommendations for GMU 2.

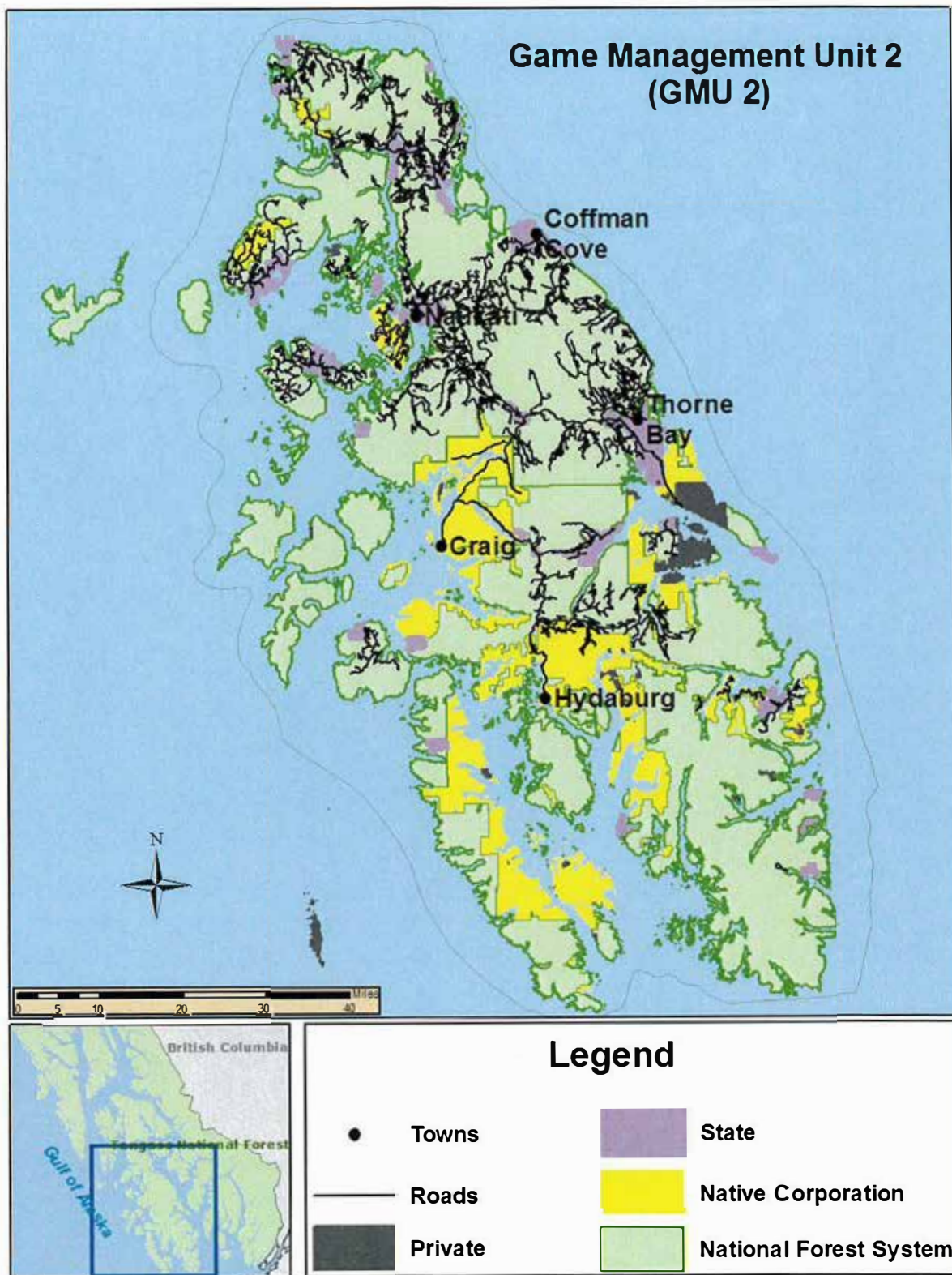


Figure 1. Game Management Unit 2 including Prince of Wales and surrounding islands.

The primary goal of these recommendations is to address wolf habitat concerns, which include Sitka black-tailed deer habitat management. The Forest Plan also requires integrating the Wolf Habitat Management Program with season and harvest limit proposals to assist in managing wolf mortality rates to within sustainable levels. Wolf harvests are managed by both the ADF&G and the USFS, under regulations adopted by the Alaska Board of Game (BOG) and Federal Subsistence Board, respectively; as described in the Wolf Management and Mortality section below. Specific population objectives have not been established for GMU 2 wolves by either management authority. However, since 1997 the BOG has set a Harvest Guideline Level (HGL) in regulation, with the intent of ensuring sustainable harvest over time. The HGL is a percentage of ADF&G's pre-season population estimate for Unit 2 wolves and represents the maximum allowable harvest under State regulation. The HGL has been periodically adjusted by the BOG in response to changes in wolf abundance and new findings on harvestable surplus. The HGL was first set at 25% of the estimated wolf population in 1997, increased to 30% in 2000, and reduced to 20% in 2015. Within the HGL, the ADF&G and USFS set annual harvest quotas, usually 100%, of the HGL. However, to address an apparent decline in wolf numbers and documentation of high rates of unreported human-caused mortality (Person and Russell 2008, Roffler et al. 2016a), harvest quotas for 2015 and 2016 were reduced to 50% of the HGL.

The objective of this document is to develop science-based recommendations to meet mandatory Forest Plan standards for wolf habitat management in GMU 2. The management intent is to secure a wolf population that supports a sustainable harvest in GMU 2. Management recommendations for habitat, roads, and harvests provided in this management bulletin are intended to ensure the population is resilient to variation in prey abundance, harvest, and land management practices. Effects of implemented actions can be measured by monitoring the wolf population using the recently developed technique of noninvasive genetic mark-recapture sampling using wolf hair (Roffler et al. 2016b), followed by evaluation and adaptive management as appropriate.

These recommendations are intended to be useful in developing project measures and alternatives using public input through National Environmental Policy Act (NEPA) processes as well as in developing future State and Federal regulations. These recommendations focus on Game Management Unit 2 but may also have utility elsewhere on the Tongass National Forest.

Key Components of Wolf Management in Game Management Unit 2

Key components of wolf management in GMU 2 should address wolf population stressors that can be influenced by management, as well as other components critical to successful wolf management. Key wolf population stressors in GMU 2 include a) a predicted decline in deer, the main prey base of wolves, from severe winters and habitat loss due to changes in forest structure from past and future timber harvest, and b) high levels of human-caused mortality enabled by access roads provide and harvest regulations (Person and Russell 2008; Gilbert et al. 2015). Past and future timber-harvest and severe-winter frequency influence wolf populations indirectly by affecting deer populations and deer vulnerability. These indirect effects can be influenced via deer habitat management. Because deer are the principle prey of wolves in GMU 2, factors affecting deer habitat and deer populations are integral to wolf population dynamics in GMU 2. Therefore, key components of successful wolf habitat management in GMU 2 include managing deer habitat capability, especially in important winter deer habitats; and minimizing human-

caused wolf mortality via road management and regulatory mechanisms through consultation with advisory committees, advisory councils, and the public. In addition, consideration of den management and human dimensions are critical to successful wolf management and are included as key components. Each key component of management is discussed in the following sections, with associated recommendations concluding each section.

Deer Habitat Management

Forest Plan standards and guidelines require, where possible, sufficient deer habitat capability to first maintain sustainable wolf populations, and then to consider meeting estimated human-deer harvest demands. Under State of Alaska statute and BOG regulation, deer in Unit 2 have been identified as a population important for providing high levels of harvest for human consumption use (5 AAC 92.108). The Forest Plan considers habitat capability of 18 deer/mi² (using habitat capability model outputs) sufficient to provide for both wolf and human harvests where deer are the primary prey of wolves, such as in GMU 2 (Forest Plan, USDA 2011). Note that Person et al. (1996) recommended using 18 deer/mi² for setting up reserves with high-quality deer habitat, but suggested habitat supporting a minimum of 13 deer/mi², where deer are the primary prey for wolves, provides for observed levels of deer harvest by hunters, trappers, and wolves. Measures require using the most recent version of the interagency deer habitat capability model and field validation of local deer habitat conditions to assess deer habitat, unless alternate analysis tools are developed. Local knowledge of habitat conditions, spatial arrangement of habitat types, information from local users, and other factors also need to be considered rather than solely relying on model outputs. One supplementary tool to model comparative deer habitat conditions, the Forest Resource Evaluation System for Habitat (FRESH; Hanley et al. 2012), has recently been developed in a spatial environment. FRESH was used as part of the 2016 Forest Plan Amendment to evaluate changes in deer habitat capability in young forest conditions in the analysis of effects associated with the transition from an old-growth dominated timber program to a young-growth program.

Healthy deer populations are integral to maintaining sustainable wolf populations in GMU 2. While data on GMU 2 deer population trends are lacking, there is strong predictive evidence that deer populations will decline in the coming decades primarily as a result of previous and ongoing forest management (Person and Brinkman 2013, The Nature Conservancy 2014). Deer populations in GMU 2 are predicted to decline by 21 to 33 percent over the next 30 years, based on various road, timber harvest, and winter severity scenarios (Gilbert et al. 2015). Of these, the most likely scenario based on current management direction is predicted to result in a 21 percent decline in deer abundance over the next 30 years. Gilbert et al. (2015) discuss a number of assumptions and associated limitations related to their deer (and wolf) model. For the purposes of this document, we acknowledge that these assumptions and limitations exist and further emphasize that model predictions should be treated as relative effects of future change rather than as forecasts of population size or viability. Causes of predicted deer declines are complicated and include severe winter frequency, wolf population dynamics, wolf and deer harvest, and road densities. One of the primary causes of decline, and also one with opportunity for managers, relates to reductions in habitat capable of supporting deer, especially during severe winters, resulting from previous and ongoing timber harvest.

Effects of Timber Management on Deer

Old-growth forests are critical to deer in providing the juxtaposition of snow interception from canopy cover (Hanley and Rose 1987) that facilitates movement and available winter forage (Hanley and McKendrick 1985). Structural characteristics of old-growth forest in southeast Alaska and in GMU 2 develop through fine-scale tree mortality and growth resulting in a rich diversity and mosaic of tree ages and structure (Schoen et al. 1988). The heterogeneous canopy structure with occasional small gaps and side-lighting translates into a forest floor mosaic that benefits deer with a rich understory of forb, shrub, and lichen forage species under a canopy that intercepts snow.

Clearcutting of old-growth forests results in vegetation development that dramatically influences deer habitat capability (Alaback 1982, 1984, Schoen et al. 1988, Gilbert et al. 2017). Early-seral, post-clearcut stages are characterized by a flush of understory shrubs that provide abundant summer forage for deer, and forage during mild winters, but do not intercept snow due to lacking canopy closure so provide little forage and hinder movement during more severe winters. The succession of young-growth forests without treatment leads to a phase of stem exclusion. The dense, even-aged canopy of the stem exclusion phase provides canopy closure and associated snow interception, which facilitates deer movement during severe winters. The dense, even-age canopy also blocks sunlight and is characterized by a forest floor devoid of understory shrubs and forbs, so lacks deer forage. The degree to which the stem exclusion phase shades out understory vegetation depends on site productivity, topography, and other conditions. Seeds and rhizomes of understory forbs and shrubs are less abundant in older young-growth stands compared to old-growth forests and clearcuts, and reestablishment in older young growth is likely dependent on distance to seed source (Tappeiner and Alaback 1989). Stem exclusion lasts multiple decades with the most productive sites, especially those that also have side-source sunlight and nearby seed sources, pushing through earliest (~age 80 years) to start developing understory shrubs and forbs again. The timing and intensity of past timber harvest has led to large areas of young-growth forest within GMU 2 (Albert and Schoen 2013) most of which are in or moving towards age classes typical of stem exclusion (USDA 2014).

The term young growth refers to forests which have re-grown after a timber harvest. Four age classes are relevant to deer habitat management. The post-clearcut age class is characterized by saplings or young tree canopies that have not yet started to connect. Young-age young growth defines early-seral stands in which tree canopies have started to connect, but that are not yet exhibiting stem exclusion. Older non-commercial young growth refers to stand ages that have reached stem exclusion, but are not yet commercially viable for timber harvest. Older commercial young growth refers to stands that have reached sizes that are commercially viable, but have not yet pushed through to developing shrubs and forbs again. Though highly dependent on site productivity and timber markets for commercial viability, the approximate age ranges for each of these stages in more productive sites is 0-15 years, 16-25 years, 26-60 years, and >60 years, respectively.

Snow depth is the primary driver of winter habitat selection by deer, with deer preference for productive old-growth forest types increasing substantially with increased snow depth (Klein 1965, Schoen and Kirchoff 1985, Gilbert 2015, Gilbert et al. 2017). Increased snow depths also resulted in increased preference for older young-growth forests which offer little forage but intercept snow, allowing for movement (Gilbert et al. 2017). Forage improvements from young-aged thinning can persist past subsequent canopy closure, however, leading to improved forage and snow intercept in treated older young growth. Increased snow depths also resulted in

decreased deer preference for recently clearcut young-growth forests due to large accumulations of snow that impede deer movements (Gilbert et al. 2017). Deer use of untreated, older young-growth forests as well as younger clearcuts can result in malnutrition due to the absence of accessible forage year-round and during winter, respectively (Farmer et al. 2006). Fawn survival and population growth (Gilbert 2015) and deer population densities (Brinkman et al. 2011) are substantially reduced by severe winters in GMU 2. Old-growth forests on south-facing slopes and lower elevations are particularly important during severe winters, when other aspects and elevations retain more snow (Schoen and Kirchhoff 1985, Doerr et al. 2005, Person et al. 2009, Gilbert et al. 2017).

Snow conditions are likely to change in southeast Alaska in the coming decades. While most models for southeast Alaska predict reductions in snow-pack, earlier snow melt, and lengthened growing season, most also predict more severe and more frequent periodic storm events (Haufler et al. 2010, Wolken et al. 2011, Shanley et al. 2015). Changes in the availability, accessibility, and longevity of summer alpine and subalpine forage important to deer that migrate to higher elevations (75% of the population in some areas; Schoen and Kirchhoff 1985) are also possible. We acknowledge that snow regimes are important and likely to change, but do not further address climate change in this document due to the complexities and uncertainties of climate change scenarios and their potential effects on deer and wolves.

Habitat Management Techniques

Habitat management has been shown to reduce the impacts of post-clearcut forest succession on deer forage (Doerr and Sandburg 1986, Zaborske et al. 2002, Hanley 2005, Alaback 2010, Cole et al. 2010, Suring 2010, Hanley et al. 2013, Harris and Barnard in prep), though population-level benefits to deer remain undocumented. Young-age thinning (often called precommercial thinning) is done on young-age young growth towards the end of the early-seral stage to delay entry into stem exclusion and shading understory forage (Doerr and Sandburg 1986, Cole et al. 2010, Hanley et al. 2013). Commercial thinning is done on older commercial young growth, resulting in timber product as well as benefits to deer forage (Zaborske et al. 2002, Hanley 2005). Small-gap creation (DeMeo et al. 1990, Knotts and Brown 1995 – cited in Suring 2010; Alaback 2010, Harris and Barnard in prep), branch pruning (Hanley et al. 2013), girdling trees (Hanley et al. 2013), elevational leave corridors (reaching from high to low elevation; The Nature Conservancy 2014), and slash treatments (Hanley et al. 2013) are other techniques used, some in combination. These techniques are discussed in more detail below. Goals of young-growth treatments include decreasing stem exclusion effects on deer forage, increasing fine-scale (within-stand) heterogeneity to provide for forage, movement (including elevational), and thermal cover needs in close proximity across young-growth landscapes, especially on deer winter range, and avoiding the inadvertent creation of a secondary conifer-recruitment flush that mimics a secondary clearcut.

Thinning of Young-Age Young-Growth Forest

Site productivity and the timing and types of treatments of young-aged young growth have important ramifications on ecological succession. The Tongass Young-Growth Management Strategy (USDA 2014) provides clarity on the wide variability of young-growth conditions as well as timings appropriate to various treatment and site types. The readiness of a stand for treatment depends on stand productivity which can be highly variable even within a stand. The ideal timing for young-aged thinning occurs when some young trees begin to express dominance and canopies begin to close. Earlier treatments are susceptible to creating a second flush of tree growth, essentially producing another effective mini-clearcut, though these concerns can be

abated with good stocking prescriptions as long as the trees are at least about 10 feet tall. Earlier treatments also run the risk of removing potentially dominant trees before they have expressed dominance. Later treatments create larger quantities of slash that inhibit deer movement and take longer to break down due to larger log diameters (McClellan et al. 2014). Higher mortality of young deer by malnutrition in thinned 28-30 year-old young growth, as well as evidence of a highly variable distribution of forage in this habitat despite its overall abundance, led Farmer et al. (2006) to speculate that large amounts of slash may have hindered movements by young deer, limiting availability of food and increasing risk of death by malnutrition. Management should aim to thin before tree sizes get big enough to cause slash to persist longer than about 10 years when slash treatment is not part of the prescription.

To prolong understory productivity by delaying the stem exclusion phase, management should aim to thin all young, untreated young growth prior to about 25 years post-harvest in medium to high productive stands; older treatments are appropriate for sites of lower productivity. Many acres of untreated young growth in GMU 2 are expected to be ready for young-age thinning as shown in Figure 2 and Table 1. Using these timing projections, treatments can be prioritized as needed in landscapes likely to support deer winter range and where the need is greatest. In addition to deer winter range, this may include prioritizing landscapes with high proportions of untreated young growth (or alternatively low proportions of intact old growth), high proportions of scheduled old-growth harvest, or where understory forage is more ubiquitously devoid across the landscape due to topographic, geologic, hydrologic, and/or soil influences. The readiness of a stand for young-age thinning as discussed above is most likely to influence treatment prioritization of stands within a landscape. Other criteria for stand prioritization that favor deer needs could include understory conditions of the stand based on topographic, geologic, hydrologic, and/or soil conditions, the likelihood of improving forage (e.g., based on side lighting), and the likelihood of improving forage near elevational movement corridors, thermal cover, and winter habitat. The most important deer winter range in GMU 2 is typically defined as southerly-facing slopes (120-240°, Person et al. 2009) lower than 800 foot elevation (USDA 2011). Habitat in close proximity to salt water may also be selected during severe winters (Doerr et al. 2005).

Leaving strips that provide elevational movement corridors for deer should retain high canopy cover within otherwise thinned young-age stands, thereby providing habitat heterogeneity, snow interception, and slash-free areas facilitating movement along elevational gradients. It is important to maintain or enhance connectivity between higher and lower elevations, aiming to connect the full elevational span of alpine to beach habitat. Ridgelines running from high to low elevation are typical travel corridors in undisturbed landscapes and should be considered for leave strips in the absence of on-the-ground knowledge of local deer movements. Steep V-notches containing streams would often be poor corridors that could inhibit deer mobility, especially in deep snow. Existing migration and movement routes, terrain features, and habitat connectivity that provide for deer-elevational movements are likely to be most important during severe winters. These routes and features should be identified by an interagency team and used in designing locations for leave strips on the landscape.

Distance between elevational movement corridors is also a management consideration. As stated above, the design of leave strip locations will often be determined by existing movement routes, terrain features, and habitat connectivity needs between stands. In the absence of these characteristics, management should space movement corridors within areas proposed for thinning to reduce the potential of deer getting trapped within thinned stands during heavy snowfalls and to reduce energy expenditure of young deer moving through slash because deep

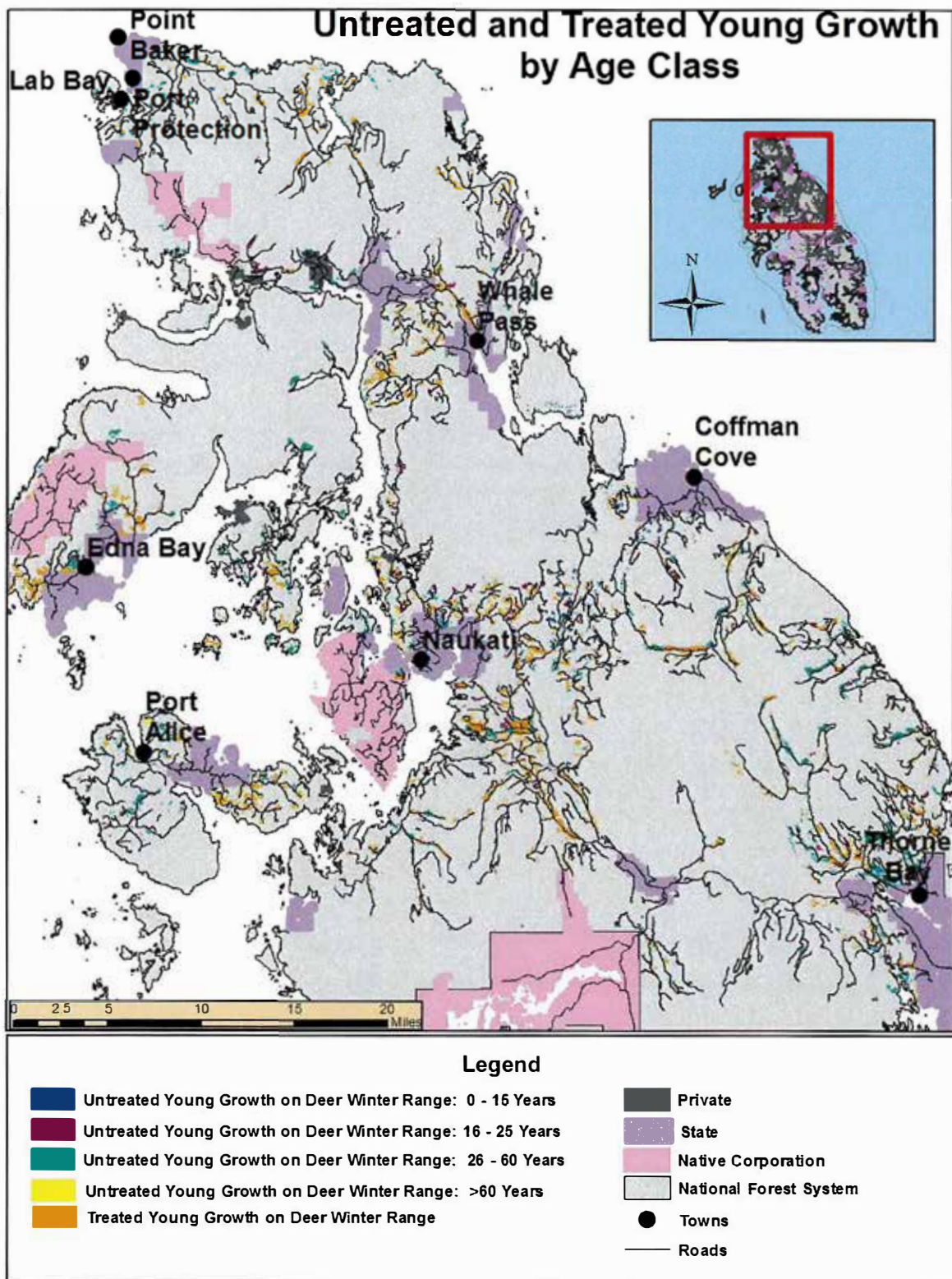


Figure 2. Untreated and treated young growth by age class (0-15, 16-25, 26-60, and >60 years) on deer winter range on Forest Service lands on the northern portion of Game Management Unit 2. Deer winter range is defined as southerly-facing slopes (120-240 degrees) lower than 800 foot elevation.

Table 1: Untreated young growth (acres; YG) on Forest Service lands by decade harvested, and open and total road densities (miles/miles²) below 1,200 feet elevation, within Wildlife Analysis Areas (WAAs) on Prince of Wales (POW) and adjacent islands in Game Management Unit 2. Open roads include all Forest Service, State, and private roads (Total Roads) minus all decommissioned and Operating Maintenance Level 1 (USDA 2005) roads. Roads data are from the National GIS Clearinghouse.

WAA	Pre-1935 YG	1936-1945 YG	1946-1955 YG	1956-1965 YG	1966-1975 YG	1976-1985 YG	1986-1995 YG	1996-2005 YG	2006-2015 YG	Total Acres YG	Open Roads mi/mi ²	Total Roads mi/mi ²
901	0	0	0	0	0	0	0	0	0	0	0.23	0.77
902	0	0	0	0	0	0	0	0	0	0	0.04	0.04
1003	0	0	172	65	452	316	252	85	0	1342	0.92	2.43
1105	0	0	0	0	0	0	0	0	0	0	0.92	0.92
1106	0	0	0	0	0	0	0	0	0	0	2.88	2.88
1107	0	0	0	0	0	0	0	0	0	0	1.02	1.05
1108	0	0	0	0	0	0	0	0	0	0	0	0
1209	0	0	0	0	0	0	0	0	0	0	0.03	0.03
1210	0	0	0	0	0	0	0	0	0	0	0.01	0.01
1211	0	0	0	0	0	0	0	0	0	0	1.45	1.59
1212	0	0	0	0	0	0	0	0	0	0	0	0
1213	0	0	0	0	0	0	0	0	0	0	0.38	0.38
1214	0	0	0	0	0	0	0	0	0	0	1.7	2.09
1315	0	0	54	1013	816	84	195	215	195	2572	1.83	2.35
1316	0	0	0	0	0	0	0	0	0	0	0.04	0.04
1317	0	0	0	0	0	0	0	0	0	0	1.04	1.9
1318	0	0	0	5	0	0	79	94	22	200	2.41	2.47
1319	0	0	0	262	319	276	677	108	40	1683	0.94	1.54
1323	0	3	13	0	11	0	5	2	0	35	0.2	0.34
1332	0	0	0	0	0	0	0	0	0	0	0.94	1.22
1420	0	0	0	453	216	15	324	47	12	1067	1.71	2.49
1421	0	0	0	11	132	367	469	17	601	1598	0.95	1.48
1422	26	73	83	0	652	369	620	662	22	2505	1.13	2.05
1524	0	0	0	0	0	0	0	0	0	0	0	0
1525	0	13	80	159	320	91	0	7	0	669	0.88	2.12
1526	0	0	0	0	343	184	0	0	0	527	0.01	0.24
1527	0	0	0	0	283	117	400	1	0	802	1.23	1.8
1528	0	0	0	5	61	0	33	1	0	100	0.23	0.64
1529	6	7	17	226	73	349	279	37	0	995	1.08	1.77
1530	0	0	0	179	41	22	158	21	78	499	1.15	1.72
1531	0	7	28	85	370	227	124	0	24	865	0.97	1.67
Total	32	103	447	2463	4089	2416	3615	1298	995	15459	POW= 0.91	POW= 1.26

snows are the most limiting factor of deer movements (Gilbert 2015, Gilbert et al. 2017). Shorter distances between travel corridors may also help reduce the young deer mortality observed in thinned stands presumably caused by slash impediments and high forage dispersion (Farmer et al. 2006). An appropriate distance for spacing travel corridors in young-age thinning has not been previously documented and deer movement limitations within young thinned stands are not well understood. Deer have been documented traveling up to 1,312 feet into clearcuts under conditions with generally low snow accumulation (Chang et al. 1995). Nelson et al. (2008) suggested limiting openings to 2.5 to 7.4 acres on deer winter range experiencing enough snow accumulation to restrict deer foraging and movement. Assuming a square clearcut, this suggests widths on deer winter range of about 330-568 feet (372-641 feet for a circular cut) to reduce the creation of movement impediments and facilitate deer access between travel corridors during snowy winters. Until additional data become available, we suggest using 400 feet as a guide to space travel corridors within thinning treatments in the absence of existing routes, terrain features, or habitat connectivity drivers.

There may also be opportunities during young-age thinning to favor certain tree species with forage value for deer. Though conifers typically have low forage value, during winter deer will forage on red cedar and yellow cedar, which should be favored over other conifers (Nelson et al. 2008). Another approach includes retaining, and possibly planting, red alder to keep the forest canopy open and retain understory forage longer as well as to improve nitrogen fixation and enhance growth of understory plants (Deal 1997, Hanley and Barnard 1998, Hanley 2005, Hanley et al. 2006, Nelson et al. 2008), though deer may avoid alder-dominated habitats during winter months (Miller 1968, Hines and Land 1974).

While some studies have assessed effects of young-age thinning treatments on understory response (Doerr and Sandburg 1986, DellaSala et al. 1996, Alaback 2010, Cole et al. 2010, Hanley et al. 2013; and ongoing monitoring see Suring 2010, USDA 2014), research on effects of young-age thinning on use and vital rates of deer are more limited (e.g., Doerr and Sandburg 1986, Farmer et al. 2006). To learn whether young growth treatments are having the desired effect and whether they can be improved, additional monitoring and research to evaluate population response of deer to young-growth treatments are needed. The need to treat second-growth forest presents an opportunity to experimentally test the effects of treatments on deer and other species. Some of the early efforts to treat young growth should be developed in an experimental framework to evaluate effectiveness of the treatments. Information from monitoring will assist in adaptive management and planning for subsequent treatments, and help avoid inadvertent creation of long-term impacts to deer habitat.

Treatments for Older Young-Growth Forest

Additional treatment opportunities are also present for older forest stand ages. Non-commercial, older young-growth treatments should generally be avoided to avoid heavy slash accumulation, if slash treatment is not part of the prescription. Exceptions may be sought where older young-growth forests exhibit stem exclusion across large portions of a landscape. In these areas, thinning, creating small gaps, pruning, girdling, and a combination of these treatments should be considered to provide forage for deer until the stand is old enough for commercial treatments, which do not incur slash impacts. Thinning treatments should generally favor the retention of dominant trees to maintain snow interception capacity of the overstory. Thinning treatments should also incorporate unthinned corridors to facilitate elevational movements by deer. Large accumulations of slash will reduce habitat availability and forage following thinning of older, non-commercial forest, so tradeoffs, mitigations, and other options should be carefully assessed.

Gap treatments are an option to consider for improving deer forage in older, non-commercial young-growth stands in areas where stem exclusion is ubiquitous across a landscape. One benefit of gap creation in older-age young-growth stands that does not occur with broader-scale thinning is that gaps provide deer forage within and near canopy closure, simultaneously providing for forage, thermal cover, and facilitated movement. Winter carrying capacity as measured in understory biomass available, biomass used, and deer days calculated using the FRESH model (Hanley et al. 2012) showed gap treatments as having higher winter capacity than thinning treatments, while both had lower values than old-growth habitat (Alaback 2010, Harris and Barnard in prep). However, the opposite relationship existed for summer and snow-free winters, with gaps resulting in fewer deer days than thinning treatments under these scenarios (Harris and Barnard in prep). Gaps also resulted in long-term benefits to deer forage, with increases continuing beyond 23 years (Harris and Barnard in prep). Approaches to increase growth and recruitment of understory forage in gaps could include pruning along the edges of gaps to maximize side-lighting into adjacent forest, siting gaps on remnant understory vegetation, and planting target understory forage plants (Christensen 2012). Mulching or tilling the duff and topsoil layers within gaps may also help stimulate microbial activity and release nutrients to increase understory plant growth. Measures should also be taken to reduce slash within gaps. The relative costs of gap creation are more than thinning based solely on the footprint area of treatment (e.g., 1/10th acre gap), but are likely more cost effective when considering the effective area that each gap, and multiple gaps across the landscape, improve for deer. Indeed, only a fraction of the area (<5–10%) of unproductive young-growth landscapes needs a gap treatment to increase forage productivity for deer (Alaback 2010).

Gaps should be large enough to provide canopy openings and sunlight to produce deer forage over time, but small enough to avoid creating a secondary recruitment flush of conifers (Alaback 2010, Deal and Farr 1994) and to function as a gap rather than as a stand-replacement disturbance (Ott and Juday 2002). Conifer flush did not appear to have a consistent relationship with gap size (Alaback 2010), though the young age of some of these stands at treatment (ages 13 to 41, median 23 years) may have been influential. The biomass of conifer seedlings in gaps ranging from 35 to 77 feet diameter in older young-growth stands (~58 years at treatment), was initially higher than shrub biomass, but was surpassed by shrub biomass after the first 10 years post treatment and continuing 23+ years post treatment, suggesting that these gap diameters did not produce a forage-limiting conifer flush (Harris and Barnard in prep).

A number of suggestions have been made regarding appropriate gap widths. Alaback (2010) suggested gaps < 160 foot in diameter simulate wind disturbance or small-patch tree mortality characteristic of old-growth forests in southeast Alaska (Nowacki and Kramer 1998, Ott and Juday 2002). Tappeiner and Alaback (1989) suggested creating openings 33 to 98 feet in diameter to help maintain understory forb and shrub species. Gaps designed to increase deer forage productivity ranged from 35 to 77 feet in diameter (60 foot mean; Harris and Barnard in prep). Calculations of appropriate gap diameters based on tree heights of the surrounding canopy may be more appropriate. One example is to use a diameter to canopy height ratio <1, which is supported by natural variation in this ratio in southeast Alaska of 0.08 to 0.62 (mean ratio < 0.3; Ott and Juday 2002). Derivations allowing for long, narrow gaps with a diameter to height ratio >1 but still functioning as gaps, for example an average long-access width < average total height of surrounding forest, have also been proposed (Ott and Juday 2002). The influences of opening shapes and sizes on forage and deer response over time are not well understood and we recommend evaluating these relationships further. Based on these uncertainties, as well as the gap parameters discussed above and the likelihood that wind will increase gap sizes by blowing down additional trees post treatment (Harris 1999, Ott and Juday 2002), we recommend

designing gap widths to be around 70 feet in older, young growth managed for deer habitat values, until additional information becomes available. This value may be adjusted to correspond with tree heights.

Girdling, typically combined with lighter thinning prescriptions, should be explored as a way of increasing deer forage in non-commercial, older-age young-growth stands within larger areas of stem exclusion. The potential benefits of girdling include reducing and delaying the accumulation of slash, thereby reducing impacts on deer mobility. Indeed, preliminary results show 4-6 times higher deer habitat values from girdling treatments compared to untreated controls (Hanley et al. 2013). There is some evidence that girdled trees in the wet, windy, and heavy-snow conditions typical of the Tongass National Forest tend to come down quickly, many snapping off at the girdle within the first 4 years after treatment (Hanley et al. 2013). Girdling technique may have contributed significantly to this outcome, however, and these scientists suggest the need for careful contract administration to avoid deep chainsaw cuts that leave too small of an intact bole to sustain wind and snow. The relative costs of girdling are generally similar, perhaps slightly higher, than those for non-commercial thinning.

Pruning, or cutting branches along the bole of trees to a defined lift height (typically as high as 17 feet), may be the most certain way to enhance deer forage in stem exclusion. This habitat management technique increased deer habitat values by 4-6 times that of untreated controls when done in previously untreated stands at age 25-35 years and monitored 4 years after treatment (Hanley et al. 2013). Pruning is expected to produce greater benefits when applied to stands that have been previously thinned (Hanley et al. 2013). Around the edges of gaps, on steeper slopes, or adjacent to other more open areas may also be good areas to focus pruning because of advantages from increased side-lighting into the forest. Pruning results in light slash that breaks down quickly and is not likely to impede deer movement. Preliminary observations suggest no additional forage benefits from pruning 50% of the trees compared to 25% of the trees (Hanley et al. 2013), though further study is warranted, especially regarding benefits of pruning all trees (100%). Effects of lift heights on forage development have not been reported. Pruning treatments may provide additional benefits for deer by retaining canopy closure and snow interception, though effects of pruning on snow interception are not well understood.

Though pruning originated to improve wood quality for harvest, it is now typically seen as a wildlife treatment because benefits to timber have not yet been actualized. Pruning may have some benefits in reducing knots and producing more clear wood (Petruccio 1994), especially if done on all trees to reduce the need for sorting by processors. However, there is evidence that pruning causes epicormic sprouting, or sprouting of small branches along the bole, especially in spruce trees (Deal et al. 2003), though follow-up site visits indicate the branches did not persist. Pruning may also result in hemlock staining (McClellan 2005). The relative costs of pruning depend on the percent of trees pruned and lift height, and can be similar to, cheaper, and sometimes more expensive than non-commercial thinning.

Treatments intended to improve deer habitat in older non-commercial young growth should include management of slash to facilitate deer movement and improve availability of forage. Slash treatment options could include bucking, chipping, burning, trail cutting, windrowing, smashing with heavy equipment, moving/piling (e.g., out of gaps), and finding uses for the logs elsewhere. Creative uses of slash include as firewood, alternative fuel for commercial boilers and residential heating systems, and riparian and instream habitat structures. Slash treatments can be cost prohibitive and are typically done at small scales (e.g., in gaps or corridor creation).

In GMU 2, young-growth stands generally start to reach commercial viability around ages 55-70+ years, depending on site productivity and market product demand; note that we used >60 years to define and summarize these stands (Figure 2). Such stands may be commercially treated or harvested. In commercial applications, logs are removed from the site, reducing the accumulation of large-diameter slash and effects of large slash on deer movements. Land Use Designations (LUDs) and Forest Plan standards and guidelines define management conditions and objectives for all Forest Service lands within GMU 2, and in some areas set sidebars for achieving those conditions and objectives.

Treatments in Stands with Dual Management Objectives

Under the 2016 amended Forest Plan, commercial young-growth treatments within Old-Growth Habitat LUDs, the beach and estuary fringe within Development and Old-Growth Habitat LUDs, and Riparian Management Areas outside of Tongass Timber Reform Act buffers within Development and Old-Growth Habitat LUDS will be designed to meet dual management objectives defined under desired conditions and management approaches. Desired conditions in these areas include progressing stands towards old-growth conditions while also obtaining commercially viable products. We recommend careful consideration be put into prescriptions in these areas. Treatments should be designed to benefit deer in the long-term. Opportunities also exist in these areas to design treatments that improve habitat for deer in the near-term by increasing understory forage development without compromising continued succession towards old-growth conditions that support long-term habitat for deer. Treatments that might be used to meet the dual desired conditions of these areas and help deer include variable-density thinning, thinning to favor retention of dominant trees, and creating small gaps and narrow openings. Some of these treatments may be combined with pruning, especially in areas with prior young-age thinning and/or adjacent to gaps to further forage development. While the 2016 Forest Plan standards require that cuts not exceed 10 acres within these areas, smaller openings are more typical across the southeast Alaska landscape (Ott and Juday 2002). Smaller openings are also allowed under these standards, would help maintain consistency with the desired management condition of progressing stands toward old-growth conditions, and would likely promote short- and long-term deer habitat value in these stands. All gaps in these areas should be narrow, designed with an approximate width of 70 feet - see discussion of gap diameters above - with increases in length and sinuosity (maintaining width) as they get bigger. Commercial opportunities should aim to be economically viable, while avoiding compromising succession towards old-growth conditions within these areas.

Habitat Treatments in Development LUDs

Commercial-age young-growth treatments in Timber Production, Modified Landscape, and Scenic Viewshed LUDs (Development LUDs) also offer opportunities for deer habitat improvement. Given that timber production is a high priority within these LUDs, deer habitat improvement may be prioritized as needed in areas with high potential for important deer winter range, such as on low-elevation, southerly-facing slopes. The overall goal would be to provide stand heterogeneity, providing deer forage in close proximity to high canopy cover (to provide thermal cover, snow interception, and travel corridors) through time, across the landscape. Deer like edges (Chang et al. 1995) and treatments that create many openings can break up large expanses of young-growth stands, improving deer habitat. Therefore, more small treatments as opposed to fewer large treatments, spread across larger or contiguous even-aged stands, can improve deer habitat value of the area. Staggering treatments in time (cutting only a small percentage of a large stand each decade, for example) can reduce fluctuations in deer habitat quality and help stabilize deer numbers. Slopes are also a consideration (The Nature

Conservancy 2014). Due to higher predation of deer on flatter slopes, especially during snowy winters (Farmer et al. 2006), there may be benefits to designing treatments that are smaller and more dispersed on flatter terrain (The Nature Conservancy 2014).

Harris (1984) developed a strategy for maximizing edge effects through successive rotations by systematically placing new cuts adjacent to stands of mid-rotation age. His concept of “long rotation islands” relies on skips between successive, wedge-shaped cuts, arranged in a circular pattern similar to a pie, with all but a permanently-protected reserve in the center harvested over successive rotations (Figure 3). This system could be conceptually adapted to low-gradient sites where deer habitat is a consideration. For example, a large young-growth stand or set of stands (e.g., a valley bottom) could be divided into 9 wedges, with one wedge treated each decade, in an order similar to that shown in Figure 3. As a guideline for wedge size, Nelson et al. (2008) suggested limiting openings to 2.5 to 7.4 acres on deer winter range that experience enough snow accumulation to restrict deer foraging and movement. This conceptual design would maintain early-succession stands (in the shrub stage) adjacent to stands at least 40 to 50 years old, throughout the entire (and successive) rotation(s). Additional ecological benefits would likely result from retention of mature or old forest in the center of the treatment “pie.”

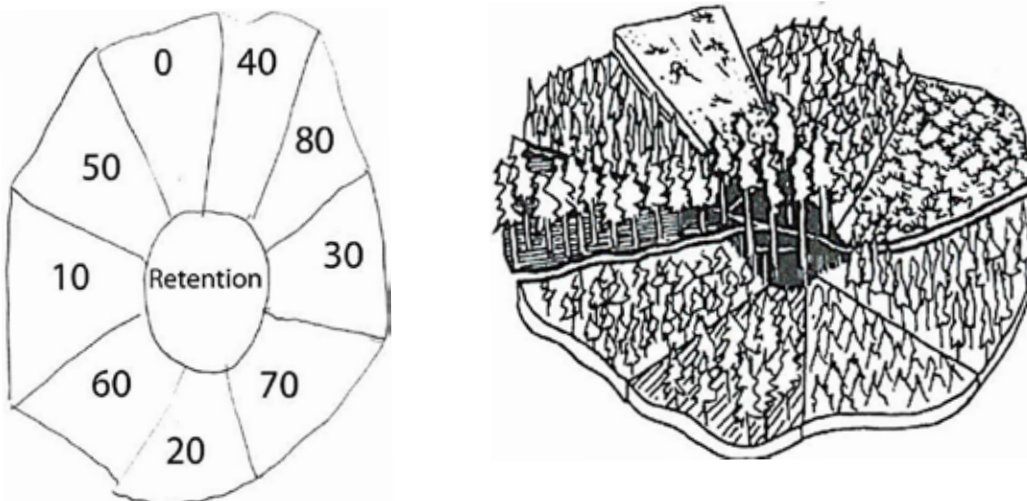


Figure 3. An example rotation island concept to provide heterogeneity and edges through successive timber rotations. Left is a schematic of 9 wedge-shaped harvest units, with the year each unit is cut through a 90-year rotation. Alternate wedges are cut 10 years apart, leaving intervening units to provide snow interception and hiding cover between recently cut units. After 90 years, the rotation island might resemble the diagram on the right; with the stand that was cut in year 0 harvested a second time. This system is recommended for low-gradient, low-elevation, young-growth sites (e.g., valley bottoms) where improvements in deer wintering habitat are desired (Adapted from Harris 1984).

A variation of Harris's (1984) long rotation island that could be adapted for use on south-facing slopes with existing roads to provide deer habitat through the full timber rotation would use blocks of 9 or more parallel strip cuts and oriented with their long axes running from high to low elevation along a south-facing slope (Figure 4). This "strip rotation block" arrangement would also rely on skips between cuts, with successive cuts done approximately every 10 years. Closed canopy forest (either old growth or young growth, as available) should be retained along ridgelines or other elevational corridors to provide snow interception throughout the rotation (Figure 4).

Both systems would produce a relatively stable ratio of shrub to older stand edges once the first few cuts were established. We note that these systems would provide a slower but perhaps more stable flow of timber from existing young-growth stands, with entries every 10 years. Managers may choose to experiment with a variety of treatments, such as gaps, variable retention thinning, pruning, or other techniques to create additional heterogeneity in the strips and wedges over time (The Nature Conservancy 2014, Harris 1984, Aubry et al. 1999).

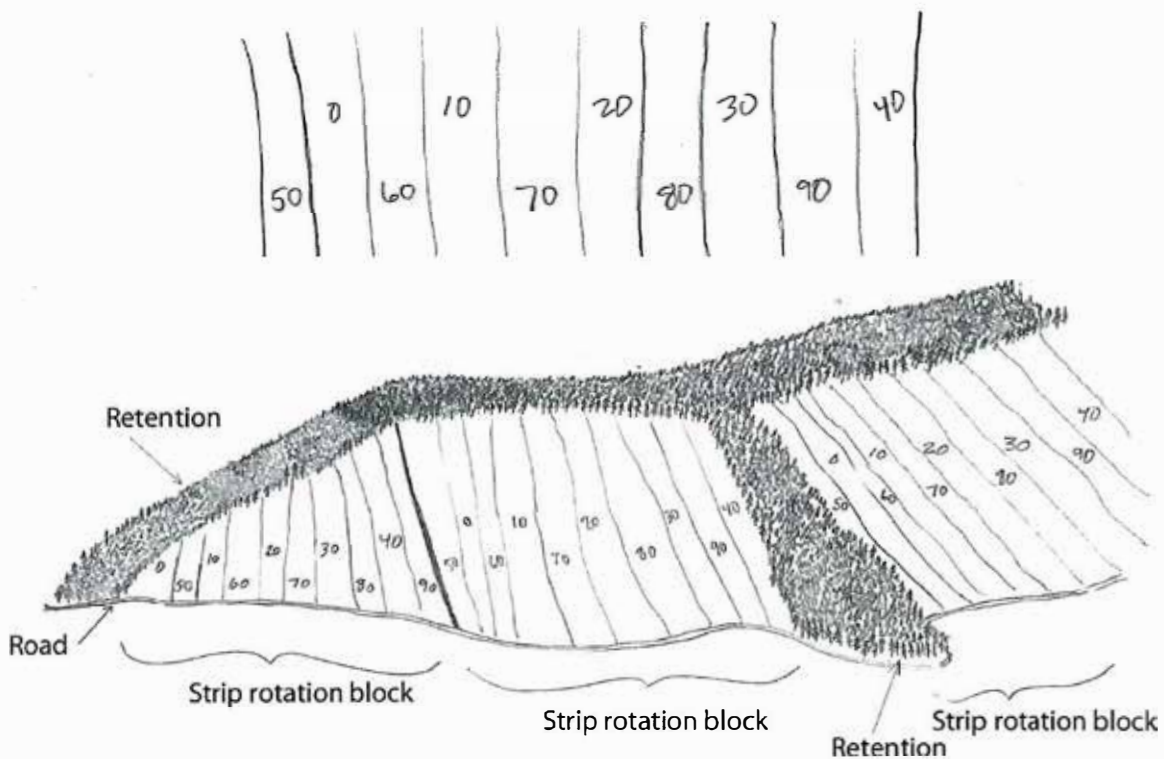


Figure 4. An example of strip rotation blocks using skips between successive cuts, to provide improved deer habitat on slopes in a landscape dominated by even-aged young growth. At the top is a schematic showing the year that each strip in a block is cut, with skips between successive strip cuts. Below is an example of how 3 strip rotation blocks might be scheduled to provide a stable supply of edges through successive, 100-year rotations, with leave strips along ridgelines to provide elevational migration corridors.

While vertical strip rotations would be useful for deer on slopes to address their elevational movement needs, smaller treatments (including Harris's long rotation islands) may be useful on flatter terrain, especially if dispersed across the landscape (The Nature Conservancy 2014).

Rotational timber harvest would not be appropriate for areas where succession towards old-growth conditions is identified as a primary or dual objective, or where stipulations would limit treatments to a single entry.

There are also opportunities to steer old-growth harvest in ways that promote deer habitat needs. For example, when conditions are suitable, old growth needed to bridge timber transition to primarily young-growth management could be obtained from northerly-facing, higher elevation slopes that constitute less important deer winter habitat. It would also be helpful to use uneven-age management or retention system techniques instead of even-aged management in old-growth harvesting where feasible to promote deer habitat needs. Further, retention of residual old-growth patches in young-growth forest can provide important landscape and stand diversity needed by deer (Chang et al. 1995, Alaback 2013).

Concepts for Deer Habitat Management Recommendations

- Prioritize habitat improvement and maintenance as needed on deer winter range.
- Achieve the following deer habitat management objectives:
 - ◆ Improve retention, recruitment, and growth of deer forage in young-growth forests.
 - ◆ Facilitate deer movements in treated young-growth forests by promoting small patches and corridors with higher canopy cover that intercepts snow, and by minimizing and mitigating accumulations of slash.
 - ◆ Provide travel corridors with high canopy cover and little slash to promote seasonal elevational movements of deer.
 - ◆ Provide a mix of habitat patches that offer forage, shelter, and movement in close proximity to each other.
 - ◆ Manage for long-term deer habitat consisting of a rich understory of forb, shrub, and lichen forage species, under or in immediate proximity to areas with high canopy cover that intercept snow, resulting from heterogeneously-structured, fine-scale canopy mosaics with small gaps and side-lighting.
 - ◆ Plan for stable ratios (see text) of openings (and other treatments that provide forage) to closed canopy forest over the long term within each watershed to minimize substantial habitat-induced fluctuations in deer populations within young-growth dominated landscapes in Development LUDs.
 - ◆ Quantitatively document effects of habitat management on deer forage, use of treated stands by deer, and the deer population.

Recommendations

Young-Age Young Growth in All Areas:

- Aim to treat all young-aged young growth, prioritizing as needed based on text and Table 1, prior to the onset of stem exclusion to offset the effects of stem exclusion on deer forage (Table 1).
- Emphasize multiple smaller treatments spread across even-age landscapes and staggered in time, to provide a variety of stand and patch ages.

- Incorporate leave strips that provide elevational movement corridors for deer. Maintain or enhance connectivity between higher and lower elevations, aiming to connect the full elevational span of alpine to beach habitat.
- Evaluate current and historic migration and movement routes and identify terrain features and habitat connectivity, possibly with interagency involvement, that are most likely to allow elevational movements by deer during severe winters, and prioritize leave strips in these areas. In absence of more definitive information, establish leave strips at about 400 foot spacing.
- Consider a variety of treatment combinations including variable-spaced thinning, girdling, pruning, small-gap creation, and slash treatments, with the goal of creating deer forage and movement corridors in close proximity, increasing heterogeneity of habitat to address needs of deer across young-growth landscapes, and avoiding the creation of a secondary conifer-recruitment flush.
- Encourage additional monitoring and research in conjunction with examination of currently available information to evaluate effectiveness of young-growth treatments on deer response.
- Strongly consider investigating population-level effects of stand treatments on deer using an experimental framework.
- Favor yellow cedar and red cedar for retention over hemlock and spruce that have no winter forage value for deer. Retain, and consider planting, red alder to allow longer retention of understory forage.

Older Non-Commercial Young Growth in All Areas:

- To avoid effects of heavy slash accumulations on deer mobility, generally avoid treating older young growth non-commercially except where older young-growth forests are exhibiting stem exclusion across large portions of the landscape. In these areas, consider thinning, creating small gaps, pruning, girdling, and a combination of these treatments to provide forage for deer on a sustainable basis through time and elevational movement corridors across the landscape.
- Thinning treatments should favor dominant trees to maintain snow interception capacity of the overstory, and incorporate unthinned travel corridors to facilitate elevational movements by deer.
- For gap treatments, encourage understory recruitment and growth by considering a) pruning along the edges of gaps to maximize side-lighting into adjacent forest, b) siting gaps on remnant understory vegetation, c) mixing (mulching or tilling) the duff and topsoil layers to stimulate microbial activity and help release nutrients, d) planting target understory forage plants, and e) designing gap sizes to about 70 feet diameter, with slight variation from this depending on tree sizes, to avoid creating a secondary recruitment flush of conifers that would shade out understory forage and to help the openings function as gaps.
- Older stands thinned or gapped non-commercially should include treatments to reduce or abate effects of slash on deer mobility. Slash treatment options could include bucking, chipping, burning, trail cutting, windrowing, smashing with heavy equipment, moving/piling (e.g., out of gaps), and looking for creative ways to use the logs elsewhere.

Commercial-Age Young Growth in Areas where Succession towards Old-Growth Conditions is Identified as a Dual Objective (i.e., Old-Growth Habitat LUDs, and Beach and Estuary Fringe and Riparian Management Areas outside of Tongass Timber Reform Act Buffers that are within Development and Old-Growth Habitat LUDs):

- Design treatments that progress stands towards old-growth conditions to benefit deer in the long-term. The long-term habitat objective for deer includes a rich understory of forb, shrub, and lichen forage species combined with snow interception, from a heterogeneously-structured canopy mosaic with occasional small gaps and side-lighting.
- Design treatments that provide understory deer forage and reduce effects of stem exclusion and slash to foster short-term habitat for deer, when such treatments can be done without compromising continued succession towards old-growth conditions that support long-term habitat for deer. Treatments could include variable-density thinning, thinning to favor dominant trees, creating small gaps and narrow openings, and pruning in areas with prior young-age thinning or adjacent to gaps.
- Avoid creating gaps and opening widths that are likely to result in a subsequent flush of conifer recruits and lose gap function that promotes understory forage; design gaps to be about 70 feet wide, adjusting as appropriate based on canopy height.
- Incorporate leave strips of intact canopy, especially along ridgelines, to promote elevational movements during severe winters and minimize distance between deer movement and foraging opportunities across the landscape.

Commercial-Age Young Growth in Development (Timber Harvest) LUDs:

- In areas with high potential for important deer winter range, as an alternative to traditional clearcutting of young growth, rotate cutting of smaller units through time (e.g., Figures 3 and 4), to accomplish the following:
 - ◆ Sustained deer forage yield throughout rotations adjacent to intact canopy that provides snow interception and facilitates elevational movements by deer. The goal is to provide heterogeneity and provide deer foraging adjacent to movement corridors and thermal cover across the landscape through time.
 - ◆ Plan rotations to provide a relatively constant supply of edges (or ecotones) between the most advanced young growth available (i.e., approaching or beyond economic maturity) and harvested stand in the shrub/forb stage of regeneration.
 - ◆ Consider vulnerability to predation when designing sizes and shapes of multi-age-class-rotational configurations, decreasing deer vulnerability on flatter slopes by creating smaller and more dispersed treatments.

Old-Growth in Development (Timber Harvest) LUDs:

- Obtain old growth needed to transition to primarily young-growth management from north-facing, higher-elevation slopes because they have lower habitat value for deer.
- Use uneven-aged management instead of even-aged management where feasible.
- Retain residual old-growth patches in young-growth forest.

Road Management

Since the late 1970s when only about 150 miles (mi) of logging roads existed on POW (USDOT undated), approximately 2,800 mi of roads have been built (USDOT 2011), resulting in current road densities as shown in Table 1. High road densities and the access and human-caused mortality they facilitate have been identified as the key driver of wolf mortality in GMU 2 (Person and Russell 2008, Person and Logan 2012, Gilbert et al. 2015). This relationship results from increased hunter and trapper access and associated increases in sighting probability and harvest opportunity and success. Forest Plan guidelines suggest that road densities of 0.7 to 1.0 mi/mi² or less may be necessary to reduce wolf-harvest vulnerability where interagency analysis concluded that road access contributes to locally unsustainable wolf mortality. Indeed, Person et al. (1996) reported that wolf harvest increased twofold when total road density below 1,200 feet elevation exceeded 0.66 mi/mi² in GMUs 2 and 3, threefold when densities exceeded 1.19 mi/mi², and fourfold when densities exceeded 1.63 mi/mi². Further, Person and Logan (2012)

found positive associations between road densities and chronic unsustainable harvest; increases of 0.3 mi/mi² resulted in 167% increases in predicted risk of chronic unsustainable harvest. However, note that Person and Russell (2008) found that road densities ≥ 1.5 mi/mi² had little additional effect on harvest rates, possibly because hunters and trappers are unable to make more effective use of higher road densities and due to depressed wolf numbers in these areas.

Given strong correlations between road densities and wolf harvest rates, management should aim to avoid increasing road densities where they exceed 0.7 mi/mi². Consider using open road

densities rather than total road densities only when road closures are effective (see below). Temporary roads and reconstructed roads needed for young-growth harvest should be included in total road density calculations and effectively closed or obliterated when their need has been met.

There are several challenges related to road management for wolves in GMU 2. One is that road closures are not always effective at reducing motorized access, either because they do not include physical barriers or existing physical barriers have become ineffective. Some closed or stored roads in GMU 2 do not have physical closures, but are closed only administratively via omission from Motorized Vehicle Use Maps as per the Access and Travel Management Plan (ATM) covering GMU 2. Many of these administratively closed roads continue to be fully accessible to trappers and hunters using highway vehicles. Some physical closures (e.g., tank traps, culvert removals, and gates) can become ineffective or are vandalized to allow vehicular passage (Person et al. 1996). Physical barriers and road obliterations are also costly to implement.

A second challenge to road management is that residents, tourists, recreationists, hunters, trappers, and most other forest users tend to like the access provided by roads and prefer keeping roads open. Because of strong public interests in roads, local managers receive pressure to avoid road closures, even when roads have been identified for closure as part of the ATM or other NEPA actions.

A third challenge is that road closures in GMU 2 may not reduce access to landscapes commensurate with the proportion of roads closed (Person and Logan 2012). Though modeled road closures reduced wolf harvest rates by an average of 17% among Wildlife Analysis Areas in GMU 2, reductions were less than expected based on the substantial road closures modeled (Person and Logan 2012). Their explanation was that road closures did not confer proportional reductions in access because portions of closed roads near open roads were still effectively open to hunting and trapping by foot. The authors included a road distance of 0.62 mi from open road junctions as effectively open, based on reported distances traveled on foot by deer hunters.

Another complication is that over half of the wolf harvest in GMU 2 occurs by boat access (57%, Person and Russell 2008; 59% Person and Logan 2012).

The road density-wolf harvest relationship and associated management are also complicated because of behavioral modifications and adaptations of wolves with respect to roads. Wolves tend to select low-use roads over non-roaded habitat due to benefits in movement, speed, and prey encounter and kill rates (Whittington et al. 2005, 2011, Gurarie et al. 2011, Zimmerman et al. 2014, Dickie et al. 2016). Selection for roads has been documented to decrease with increasing road densities (Houle et al. 2010), decrease during the day/increase during night under increasing road densities (Zimmerman et al. 2014, Benson et al. 2015) with commensurate increases in survival associated with this behavior (Benson et al. 2015), and occur primarily during nomadic periods in the fall and early winter (Houle et al. 2010, Lesmerises et al. 2013), which overlaps with the hunting and trapping seasons in GMU 2. Other studies showed that prey availability was the driving factor for habitat selection irrespective of road densities (Lesmerises et al. 2012, Dellinger et al. 2013), but that increased human densities decreased selection for roads (Dellinger et al. 2013). Almost all of these relationships also depend on trapping pressures, with increased trapping pressures increasing risks of roads and road densities on wolves. The complexities of wolf behavior and habitat selection with respect to roads further contribute to challenges in road management for wolves.

Despite these challenges, given the importance of roads and road densities to wolf harvest and population concerns within the northcentral portion of POW, road management opportunities need to be addressed. Some opportunities exist to better manage roads already closed under the current ATM. One is installing physical barriers (e.g., culvert removal, tank trap, or locked gate) on all roads identified for closure or storage. It is worth considering using adjacent terrain features in placement of new physical barriers to help make physical barriers more effective at blocking access to all-terrain vehicles (ATVs) throughout the year. There are also clear benefits from monitoring and maintaining physical barriers to ensure they remain effective.

Other opportunities exist for managing future road closures in GMU 2. Person and Logan (2012) emphasized the importance of providing core wolf habitats of low road density. The Conservation Strategy of the Forest Plan includes a reserve network incorporating all non-development LUDs and a system of small, medium, and large old-growth reserves. It would be of value to identify core wolf habitat in GMU 2, perhaps using the designated reserve network in the Conservation Strategy, current and past pack activity centers, productive habitats for deer, elevation and habitat preferences, and focused seasonal use areas such as salmon streams. This core wolf habitat could then be managed for low road densities, for example by limiting road construction and reconstruction, and prioritizing this habitat for future road closures. We do not have enough information to provide a map of these areas at this time, but see value in this approach.

Prioritizing roads for future closure can be based on characteristics that influence wolf harvest risk. Person and Russell (2008) identified muskegs, where they intersect roads at localized scales, as a predictor of mortality risk, though at larger landscape-level scales muskeg negatively correlated with road densities so the opposite relationship was observed (Person and Logan 2012). Harvest risk may also be influenced by alpine habitat (i.e., mountainous topography) that concentrates wolf activity in narrow valley bottoms and in beach fringe habitats (Person and Russell 2008). Person and Logan (2012) also found correlations between harvest risk and land distance from towns and villages. A combination of factors affecting wolf-harvest vulnerability could be used to prioritize road closures. Future road closures should also be prioritized in areas

where benefits to wolves are most likely to be realized, where effective road access can be reduced to levels that minimize wolf mortality (e.g., to 0.7 mi/mi² or lower), and where a closed road has the most benefit in reducing hunter/trapper access to wolves (e.g., within pack activity areas during harvest seasons).

There is additional opportunity for regulatory closure of roads to wolf hunting and trapping, especially in Wildlife Analysis Areas where wolf harvest is unsustainable (see Person and Logan 2012). Person and Russell (2008) recommended a combination of large roadless reserves and conservative harvest regulations as the most effective means of conserving wolves where risks from human-caused mortality are high. See the Wolf Management and Mortality section for additional discussion and regulatory recommendations related to road management.

Recommendations

- Avoid increasing road densities where total road densities (including temporary roads) exceed 0.7 miles per square mile within GMU 2 Wildlife Analysis Areas.
- Effectively close all roads that are currently administratively closed by omission from, meaning they are no longer included on, Motor Vehicle Use Maps covering GMU 2.
 - ◆ Identify roads that have been administratively closed, but are not physically closed.
 - ◆ Install physical barriers (e.g., culvert removal, tank trap, or locked gate) on roads identified for closure to prevent vehicle access (allowing for ATVs where specified).
 - ◆ Consider coordinating adjacent terrain features in placing new physical barriers to help make them more effective.
 - ◆ Monitor and maintain physical closures to ensure they remain effective.
- Effectively close roads that have been identified as temporary when the purposes of those roads have been met.
- Prioritize roads for closure based on wolf harvest vulnerabilities in future ATMs or other NEPA planning processes using interagency and public input. Focus closures in areas where benefits to wolves are most likely to be realized.

Wolf Management and Mortality

Wolf harvest in GMU 2 is managed by both the ADF&G and USFS through implementation of regulations set by the BOG and the Federal Subsistence Board. These agencies work collaboratively to manage the wolf population and harvest, with public input from State-designated Advisory Committees and the federally-designated Southeast Alaska Subsistence Regional Advisory Council. State regulations governing wolf harvest in GMU 2 are more restrictive than elsewhere in Alaska, including both a specific HGL for the population and a 14-day sealing requirement for trappers. The current HGL set by the BOG limits harvest to 20% of ADF&G's preseason population estimate and the 14-day sealing requirement for trappers, typically 30 days elsewhere, is the shortest in the state. The short sealing period was set to help managers monitor harvest during the trapping season. Managers may set a harvest quota that is less than the number of wolves potentially allocated for harvest under the HGL percentage. State hunting and trapping seasons open on December 1 and close on March 31. However, most land in GMU 2 is Federally managed and most hunters and trappers are Federally qualified subsistence users, so wolf harvest is effectively managed under the longer Federal hunting (Sept.

1-Mar. 31) and trapping (Nov. 15-Mar. 31) seasons. State and Federal managers may close seasons early by ADF&G emergency order and Federal special action. Neither State nor Federal regulations include a personal bag limit for trappers, but the bag limit for hunters is 5 wolves (Table 2).

Since 1997 the trend in managing GMU 2 wolf harvest has generally been one of successively restricting harvest to address apparent and then documented declines in the population. The State and Federal wolf hunting and trapping seasons in GMU 2 were closed early by emergency order in 1999, 2013, 2014, and 2015. To address high and potentially unsustainable harvest during the early to mid-1990s, in 1997 the BOG established an HGL for GMU 2 wolves of 25% of the most recent population estimate. At that time the most recent estimate was 250-350 wolves (Person et al. 1996), so ADF&G set the harvest quota at 90 wolves. In 2000 an analysis by ADF&G found that intraspecific mortality among GMU 2 wolves was lower than elsewhere and that the population could sustain a 30% harvest rate (Larsen 1997). Based on that finding the BOG raised the HGL to 30% of the population estimate, but ADF&G kept the harvest quota at 90 wolves. To address concerns over an apparent decline in wolf numbers, in 2010 ADF&G reduced the harvest quota to 60 wolves, and in response to a 2013 population estimate (221 wolves, 95% confidence interval = 130-378, Roffler et al. 2016a) suggesting a continued decline, ADF&G reduced the harvest quota for 2014 to 25 wolves. Another population estimate in 2014 (89 wolves, 95% confidence interval 50-159, Roffler et al. 2016a) indicated the population continued to decline, so the BOG reduced the HGL to 20% of the most recent population estimate. To encourage recovery of the population while providing harvest opportunity to hunt and trap wolves, ADF&G and USFS managers reduced the quota under the HGL by 50% in 2015 and 2016.

Table 2. Current hunting and trapping regulations for wolves within Game Management Unit 2. These regulations are implemented by the State of Alaska and U.S. Forest Service (authority delegated by the Federal Subsistence Board).

	Federal Hunting	Federal Trapping	State Hunting	State Trapping
Season	Sept. 1–Mar. 31	Nov.15–Mar. 31	Dec. 1–Mar. 31	Dec. 1–Mar. 31
Individual Harvest Limit	5 wolves	No Limit	5 wolves	No Limit
Sealing Requirement	Within 14 days of harvest	Within 14 days of harvest	Within 30 days of harvest	Within 14 days of harvest
Trap / Snare Identification	Not Applicable	Required	Not Applicable	Not Required
Quota	Season may be closed when the combined (joint) Federal-State quota is reached.	Season may be closed when the combined (joint) Federal-State quota is reached.	Quota will not exceed 20% of the most recent unit-wide pre-season (fall) population estimate.	Quota will not exceed 20% of the most recent unit-wide pre-season (fall) population estimate.

Wolf researchers (Fuller 1989, Gasaway et al. 1983, Keith 1983, and Peterson et al. 1984) found that populations decline when total wolf mortality exceeded 25-40%. Person et al. (1996) also emphasized that wolves occupying islands, like those in GMU 2, are likely more vulnerable to overexploitation because they cannot be readily augmented by immigration from adjacent areas. Mortality results from human (legal harvest, wounding loss, collisions with vehicles, and illegal

killing) and natural (starvation, accidents, disease, and fighting) causes. Natural mortality accounts for about 4% of annual mortality (Person and Russell 2008), and ideally human-caused mortality can be regulated by managers. However, management of wolves in GMU 2 has been complicated by an apparently high level of unreported human-caused mortality and until recently, the challenge of obtaining a reliable estimate of abundance. Using the fates of radio collared wolves, Person and Russell (2008) estimated that unreported human-caused mortality accounted for nearly 50% of mortality in GMU 2. Although limited, more recent data suggest that 40%-50% of GMU 2 wolf mortality still results from unreported human causes. By setting 2015 and 2016 harvest quotas at 50% of HGL, managers attempted to compensate for high levels of unreported human-caused mortality.

Wolves in GMU 2 are currently managed to provide a sustainable harvest (Alaska Constitution, Article VIII, Section 4). However, no quantitative population or harvest objectives for wolves exist. Unit 2 wolves are presently managed as a population that fluctuates in response to prey abundance, environmental conditions, and human harvest. Establishing science-based population and harvest objectives for GMU 2 wolves through an inclusive public process would help guide habitat management and regulatory planning, while incorporating social concerns related to deer and wolf abundance and reducing the likelihood of future litigation related to wolves. Ideally, a management plan would include a harvest strategy that maintains the population within a desired range.

We recommend that the population objective be expressed as a range (e.g., 150 to 300 wolves) rather than a single number (e.g., 200 wolves) to promote regulatory stability through wolf population fluctuations that are expected to be sustainable and acceptable. A population objective range could also allow for consideration and recognition of the precision or statistical confidence of population estimates.

Confirming that population objectives are being met will require periodic estimates of wolf abundance with more frequent (perhaps annual) estimates when the population is low. Failure to meet objectives could trigger regulatory actions such as conservative harvest caps or shortened harvest seasons.

Additional consideration needs to be given to the interval for population estimates needed to effectively manage wolves in GMU 2. Annual abundance estimates are currently produced through a temporary research project. Each estimate requires at least 10 weeks of staff time and substantial funding. Consideration must also be given to producing estimates that more closely reflect abundance at the beginning of hunting and trapping seasons, rather than during the fall of the previous year. Managers should consider whether estimates of mortality and reproduction during the preceding winter and summer can be incorporated into fall wolf abundance estimates.

The most recent data on sustainable wolf harvest rates are reported in the USFWS's Species Status Assessment for the Alexander Archipelago Wolf (2015). Mortality of wolves due to human harvest may be compensated for via increases in survival, reproduction, or immigration (i.e., compensatory mortality) or harvest mortality may be additive, causing overall survival rates and population growth to decline. Most studies demonstrate that high rates of reproduction and immigration can compensate for human-caused mortality rates of 17–48% ($\pm 8\%$; Fuller et al. 2003, pp. 184–185; Adams et al. 2008 [29%], p. 22; Creel and Rotella 2010 [22%], p. 5; Sparkman et al. 2011 [28%], p. 5; Gude et al. 2012 [25%], pp. 113–116). However, results of other studies suggest that harvest of wolves by humans are at least partially additive (Murray et al. 2010, pp. 2519–2520), and therefore, sustainable mortality rates may be lower than expected ($\sim 22\text{--}25\%$; Creel and Rotella 2010, p. 5). Sustainable rates of human-caused mortality within a

wolf population vary considerably based on population characteristics such as age and sex structure, but typically depend on productivity and immigration (Fuller et al. 2003, p. 185). In this regard, each population (or group of populations) is different and a universal human-caused mortality rate does not exist.

Unreported human-caused mortality has been documented in GMU 2 at rates of 38% (Roffler et al. 2016a) and 47% (Person and Russell 2008) of collared wolves killed by humans (3 of 8 and 16 of 34 wolves, respectively). Causes of death in these unreported instances included gun shot, snare, and trap wounds, though it is important to recognize that data from most of these cases do not speak to intent. Some of these animals may have been injured during attempted lawful harvest but escaped, and so were not successfully recovered and therefore went unreported. Regardless, unreported human-caused mortality exists at fairly high levels in GMU 2. Harvest quotas should continue to account for this.

Beyond incorporating unreported human-caused mortality rates into quota development, there are challenges in effectively regulating unreported human-caused mortality. Accidental escapes from otherwise lawful harvest would be difficult to further regulate because they occur accidentally and sometimes unknowingly. Purposeful unreported harvest would be difficult to further regulate in GMU 2 because of the expanse of the island and its road system and paucity of enforcement officers. Increasing the number of enforcement personnel on the ground, and prioritizing wolf trapping season patrols in GMU 2 may help. Prioritizing and increasing enforcement in the beginning of the season as well as pre-season may help more generally to help ensure the quota is not surpassed, especially when the quota is low.

Wolf trappers in GMU 2 are not currently required to identify their traps or trap-lines with a trap label or sign indicating their name and address or permanent identification number under State regulations, but trap marking is required under Federal regulations. The lack of trap marking requirements under State regulations reduces the ability of law enforcement personnel to identify owners of traps set outside open seasons. Regulations that require identification of trap ownership can help encourage responsible and ethical trapping. Recommendations to mark traps must be vetted through public processes involving advisory committees and advisory councils. In addition, law enforcement agencies must be able to articulate the need and effectiveness of proposed enforcement-related regulatory actions. Therefore, we recommend that USFS and ADF&G staff work with advisory groups and law enforcement to determine need and effectiveness of wolf trap marking requirements for GMU 2 in both State and Federal regulations.

Given the importance of monitoring wolf mortality relative to varying annual harvest quotas and the two-week period between when a wolf is harvested and when it is required to be sealed, it is worth continuing to look for creative ways to encourage timely reporting of wolf harvests and to minimize and enforce against unreported human-caused mortality. Previous considerations included implementation of mandatory trap checks and limiting the number of traps per trapper, but these recommendations were rejected because we expected little or no population-level benefits from these actions. Peer pressure from lawful hunters and trappers may have influence in GMU 2, so continuing to foster good relationships between agency personnel and hunter and trapper communities will be important (also see Human Dimensions section). Additionally, management agencies must engage with advisory committees and advisory councils to determine social desires for wolves, deer, and harvest opportunities.

Because salmon are an important seasonal component of wolf diets in southeast Alaska (Szepanski et al. 1999, Darimont et al. 2008), wolves may be vulnerable to hunters at salmon

spawning areas from the beginning of the Federal hunting season, Sept 1, through the end of the spawning period. Historically, however, early season harvest has been low (<5%, September-November; R. Scott, personal communication) with peak harvests occurring during the period December to February. Even during regulatory years 2011-2015, which had lower quotas, early-season wolf take in GMU 2 along salmon streams constituted <2% of total harvest (B. Porter, personal communication). We do not consider harvest along salmon streams a biological concern at this time. Delaying the Federal wolf hunting season until after most spawning has ended (typically in October), or closing wolf hunting along roads at productive salmon streams could be options for reducing early mortality if this becomes an issue in the future.

Given the strong correlation between road densities and wolf harvest, and the challenges with road closures, there may be opportunities to manage road closures with regulations. Person and Logan (2012) suggested considering the roaded portion of central and northcentral POW for a regulatory regime separate from the rest of GMU 2, thereby facilitating regulatory changes specific to this area. One example is to establish a controlled use area within the roaded portion of central and northcentral POW, within which a motorized vehicle cannot be used to assist with wolf hunting or trapping. Another example is to consider regulatory closure to wolf hunting and trapping along roads within this roaded area or in Wildlife Analysis Areas where wolf harvest is unsustainable (see Person and Logan 2012).

Recommendations

- We recommend ADF&G and USFS biologists establish a science-based management strategy with population objectives for wolves in GMU 2, using input from affected and concerned stakeholders.
- Maintain flexibility in quota management to alter quotas on a yearly basis to ensure wolf population and harvest sustainability.
- Continue to incorporate unreported human-caused mortality rates in developing wolf harvest quotas using best available data.
- Monitor the wolf population to help evaluate program effectiveness.
- Prioritize and increase enforcement in pre-season and beginning of season, increase enforcement capabilities, and prioritize wolf trapping season patrols in GMU 2.
- Work with advisory groups and law enforcement agencies to determine need and effectiveness of wolf trap marking requirements for GMU 2 in both State and Federal regulations.
- Continue to consider additional ways to minimize unreported human-caused mortality of wolves in GMU 2.
- Consider the roaded portion of central and northcentral POW for a regulatory regime (e.g., controlled use area) separate from the rest of GMU 2 to facilitate regulatory changes specific to this area.

Den Management

The Forest Plan includes standards and guidelines addressing wolf den management. Measures include designing management activities to avoid abandonment of wolf dens, maintaining a 1,200 foot forested buffer, where available, around known active wolf dens, discouraging road

construction within this buffer and identifying alternative routes where feasible, and permitting no road construction within 600 feet of a den unless site-specific analysis indicates that local landform or other factors will alleviate potential adverse disturbance. Further, if a den is monitored for 2 consecutive years and found to be inactive, these buffers are no longer required, though each known inactive den site is to be checked to see if it is active in the spring, prior to implementing on-the-ground management activities (e.g., timber harvest or road construction).

Aspects of these standards and guidelines may be insufficient to adequately protect wolf dens. Of particular concern are guidelines allowing den buffers to be dropped after 2 years of den inactivity, and the buffer distances for road construction and other potentially disturbing management activities. Wolf den sites are frequently used in multiple consecutive years and intermittently over long periods (Mech and Packard 1990), suggesting both high den-site fidelity and the importance and perhaps rarity of suitable den sites on the landscape. Within GMU 2, dens are typically located in loose, dry soils, under root-wad cavities of large living or dead trees, within dense canopies of old-growth forest, near freshwater, often on peninsulas or islands, on gentle, low-elevation slopes, and farther from logged stands and roads than random sites (Person and Russell 2009). Large proportions of the GMU 2 landscape are considered unsuitable for den sites due to logging and topography, and availability of the combined characteristics that provide quality den sites may be limited (Person and Russell 2009). Therefore, management should aim to protect den sites, as well as sufficient foraging habitat to successfully rear pups at each den in perpetuity. We specifically recommend: a) perpetually protecting all documented wolf dens (active and inactive) with noncircular polygons of not yet determined size to ensure the specific den sites remain attractive and b) protecting some not yet determined proportion of old-growth foraging habitat within core foraging areas utilized by wolves during denning to ensure the dens remain a viable place to rear pups. Additional evaluation of core use areas around den sites is necessary to identify appropriate buffers for dens (discussed in more detail below). These protected denning areas and foraging habitat should be generally centered around the dens, determined by interagency biologists (ADF&G, USFS, and USFWS), and based on wolf core use areas (i.e., den sites and core foraging areas) during denning, or habitat features that model core use during denning, as per impending ADF&G analyses. We encourage young-growth management within the protected denning areas that promotes development of habitat values for wolf denning. Therefore, we recommend young growth management in these areas be in accordance with Forest Plan direction for areas where succession towards old growth conditions is a dual management objective with providing commercial timber byproducts (see detailed definitions and recommendations for deer habitat specific to these areas in Deer Habitat Management section above).

To preserve key denning habitat and additional den-site options for wolves, Person and Russell (2009) recommended retaining roadless, forested buffers >330 feet wide around low elevation major lakes and streams in extensively logged watersheds. This recommendation may be fine-tuned a bit using slope characteristics of den sites in GMU 2; dens were observed on gradual slopes ranging up to 13.7 degrees (Person and Russell 2009). In addition, wolves selected den sites with coarse canopy old growth (Person and Russell 2009). Therefore, retaining roadless, gently sloping (< 14 degrees) old-growth forest within 330-foot buffers of major lakes and streams in extensively logged watersheds would be of value. Major lakes are defined here to include class I lakes (lakes with anadromous fish or with high value resident fisheries) and class II lakes (lakes with lower value resident fisheries) that are ≥ 3 acres. Major streams are defined here to include class I (streams with anadromous or adfluvial fish or fish habitat, or high quality resident fish or habitat) and class II (streams with resident fish or fish habitat that do not meet class I). Extensively logged watersheds are defined here to include value comparison units

(VCUs) that have had concentrated past timber harvest activity and are at risk for not providing the full range of functions (see Forest Plan Wildl IV D, pages 4-86 and 4-87).

Avoiding abandonment of active dens and associated movement of pups to another den site (hereafter called den relocation) from human disturbance is another consideration for management. A number of studies have documented den relocations as a result of human disturbance (Chapman 1979, Thiel et al. 1998, Frame et al. 2007, Habib and Kumar 2007, Argue et al. 2008, Beck et al. 2009, Person and Russell 2009). Wolf dens may be relocated to other nearby den sites several hundred feet away and up to several miles away (up to 4.7 miles, Habib and Kumar 2007). Though some studies have found no negative effects on pup survival from human-caused den relocations (Frame et al. 2007, Habib and Kumar 2007), loss of pups can occur during (Smith 1998, river crossing) or after den relocations (Argue et al. 2008, drowned in new den site), so a conservative approach to management is warranted. Because nearby freshwater is a selection factor for GMU 2 den sites and sites are often situated on peninsulas and islands (Person and Russell 2009), the potential for a disturbance-caused relocation requiring negotiation of water crossings by small pups also warrants caution. Other negative effects on long-term pup growth and survival could occur if the alternate site is of lesser quality, is in an area with lower prey density, or the relocation results in fewer pack helpers (Habib and Kumar 2007).

Wolf pup age is key in determining the likelihood of disturbance causing den relocation and the success of a relocation effort, and therefore is most influential in determining an appropriate window for seasonal restrictions of management activities near dens. Dens with young pups ≤ 3 weeks of age did not relocate with a single human walk-through and brief stay at the den site, while those with pups >6 weeks of age always relocated (Frame et al. 2007). Dens with intermediate pup ages of 4-6 weeks varied in response, with some relocating, some attempting to relocate, but moving back to the natal den due to poor pup mobility and adult difficulties with carrying small pups, and others not attempting to relocate (Frame et al. 2007). However, even dens with young pups (1-3 weeks) were relocated under scenarios with more intense human disturbance, such as entries into dens to count pups (7/8 dens relocated) and pup handling (3/4 dens relocated; Beck et al. 2009).

Even though wolves are more likely to relocate their dens after pups are > 6 weeks of age, the most vulnerable period for disturbance is in the early to intermediate denning period (< 6 weeks), when the pups are less mobile or immobile and must be carried. After 6 weeks, pups are mobile enough to move to rendezvous sites or alternate den sites and these behaviors occur naturally without disturbance. The period of about 4 weeks before the pups are born is also thought to be important, as disturbance during this period may affect den selection and occupancy (Chapman 1979). Within GMU 2, natal dens were occupied from April 21 to July 15 (Person and Russell 2009). An appropriate window for seasonal management activity restrictions around active dens that encompasses these dates, as well as about 4 weeks prior to avoid negatively influencing selection of quality den sites, is 15 March-15 July.

The buffer distance necessary to avoid den relocations due to management activities depends primarily on the intensity and frequency of the disturbance activity, but also on other factors. Habitat is important, with open tundra requiring greater buffer distances to avoid disturbance than forested habitats (Chapman 1979). Intervening terrain features are also likely to have an effect on noise-disturbance levels from activities. The primary management activities in GMU 2 that may disturb wolf dens involve logging operations, including sawing, using large machinery, hauling, helicopter logging and associated overflights, and road construction or maintenance.

Based on our experience and personal communications the 1,200 foot buffer in the Forest Plan seems to be sufficient in preventing den relocations related to ground-based activities like sawing, machinery, and hauling activities, but not with activities causing greater noise disturbance, such as helicopter activity. A buffer of 600-feet for road construction is not likely to be sufficient to avoid relocation of a den. Person and Ingle (1995) reported a den relocation shortly after the start of road building activity nearby, though they acknowledged that this may have occurred at the normal time that wolves depart their dens (July). These authors also observed reduced year-round activity in the area thereafter and use of a poorer quality site 7 miles away the following year, suggesting wide-scale displacement from road construction affecting the use area of this pack. Other scientists showed avoidance of major roads with increasing human disturbance (e.g., traffic and construction activities) during the denning season (Lesmerises et al. 2013). One study in tundra habitat recommended a distance of 1.5 miles to avoid human disturbance, but the necessary buffer distance is expected to be smaller in forested habitats (Chapman 1979). We recommend using a ½ mile buffer for loud disturbance activities (e.g., helicopter logging or overflights, blasting, road construction) during the denning season.

Recommendations

- Perpetually protect the integrity of all documented wolf dens (active and inactive) with noncircular polygons of not yet determined size, generally centered around the dens, as determined by interagency biologists (ADF&G, USFS, and USFWS). The goal is to ensure each den remains attractive to wolves by protecting habitat to maintain a degree of isolation from development and human activity. The size and shape of these relatively small protected areas should be based on a pending analysis by ADF&G. Whenever possible, landscape features (hills, ridges, etc.) should be used to provide isolation.
 - ◆ Encourage young-growth management within these areas in accordance with Forest Plan direction for areas identified with dual objectives (see text) to promote development of wolf denning habitat values.
- Retain a not yet determined proportion of old growth habitat within core wolf foraging areas utilized during denning to ensure den sites remain viable for rearing pups. Protected old growth foraging habitat shall be generally centered around the dens (active and inactive), determined by interagency biologists (ADF&G, USFS, and USFWS), and based on wolf core foraging areas during denning, or habitat features that model core foraging areas during denning, as per impending ADF&G analyses.
- Retain roadless, gently sloping (< 14 degrees) old-growth forest within 330 foot buffers of major lakes and streams in extensively logged watersheds to preserve key denning habitat and den-site options for wolves.
- Implement timing restrictions during March 15 through July 15 to reduce the likelihood of active dens relocating due to disturbance:
 - ◆ Permit no disturbance within 1,200 feet of active dens that could result in den relocation.
 - ◆ Permit no loud disturbance activities (e.g., blasting, helicopter logging and overflights for Forest-Service activities, road construction) within ½ mile of active dens.
 - ◆ If status of a den is uncertain, then assume it is active.

Human Dimensions

Human dimensions are among the most elusive, challenging, and important aspects of a successful wolf management program. Human dimensions cover social aspects of wildlife management, including stakeholder input processes and public attitudes toward wolves and wolf management. Wolves are an important subsistence resource for fur sewing, handicrafts, sale of fur and other direct uses. Within GMU 2, another aspect of human-wolf interactions derives from the subsistence nature of the remote villages on the islands and the importance of deer as the primary human food source, along with fish, and supplemented by other hunted, gathered, and purchased food items. As a result, wolves are seen as a direct competitor for an important food source. Other aspects of human-wolf interactions in GMU 2 include hunting of wolves and deer, tourism, trapping and selling wolf furs, wildlife viewing and tourism, human and pet safety concerns, and the importance of wolves in maintaining ecological integrity and sustainability that supports other human consumptive and non-consumptive uses of animals and their habitats on the island.

Opportunities to improve human dimensions in GMU 2 include continued community involvement and shared learning in wolf and deer habitat and regulatory management and monitoring. Outlets include public meetings, informational brochures, internet and social media, and working with schools and community groups. As mentioned in the Wolf Management and Mortality section, continued fostering of good relationships between interagency personnel and hunter and trapper communities is critical. Management of wolf harvests by both the State of Alaska and the Federal Subsistence Board should be informed by public meetings and other solicitations from stakeholders, including regular briefings between the primary managers.

The Forest Plan encourages young-growth treatments that provide for areas important and accessible to human hunting of wildlife, including deer (WILD2 I A 1 c, page 4-93). The level of access to preferred hunting habitat has been shown to be just as important as deer densities in determining hunter efficiency (Brinkman et al. 2009). Therefore, improving forage production within young-growth stands that are accessible to, and in areas preferred for human hunting of deer, may help alleviate human-wolf-deer tensions in GMU 2.

Recommendations

- Continue community involvement and shared learning in public meetings, informational brochures, internet and social media outlets, working with the schools, and community groups.
- Foster good relationships between interagency personnel and hunter and trapper communities.
- Inform the Southeast Alaska Subsistence Regional Advisory Council, local advisory committees, Federal Subsistence Board and the State of Alaska Board of Game on an annual or more frequent basis of current wolf research and management efforts.
- Hold public meetings or solicit public input and information sharing when setting wolf harvest management quotas.
- Consider young-growth treatments that provide for areas important and accessible to human subsistence hunting of deer.

Monitoring and Research Needs

Below is a list of monitoring and research needs identified during development of this document. This is not an exhaustive list, but may have utility in guiding monitoring and research priorities.

- GMU 2 wolf population monitoring
- GMU 2 deer population monitoring
- Climate change effects on snow levels, deer population fluctuations, and alpine forage
- Effects of young-growth treatments on deer use, vital rates, and population dynamics
- Effects of pruning on snow interception
- Effects of pruning different proportions of trees (e.g., 25% vs 100%) on deer forage
- Influences of gap opening sizes and shapes on forage and deer response
- Assessment and inventory of GMU 2 existing deer movement routes, terrain features, and habitat connectivity needs
- Optimal spacing in thinning treatments of elevational travel corridors for deer in the absence of existing routes, terrain features, or habitat connectivity drivers
- Closure effectiveness inventory and monitoring of closed roads in GMU 2
- Assessment and identification of focal areas/roads where benefits to wolves would most likely be realized by road closures
- Assessment of area needed around dens to protect den sites
- Assessment of proportion of old growth habitat within core wolf foraging areas during denning needed to keep den sites viable for rearing pups
- Assessment of noise disturbance buffer distances needed to avoid den relocations, and terrain influences

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Wolf Technical Committee

(alphabetical by last name)

Bonnie Bennetsen, USDA Forest Service

Steve Brockmann, U.S. Fish and Wildlife Service

Anthony Crupi, Alaska Department of Fish and Game

Brie Darr, USDA Forest Service

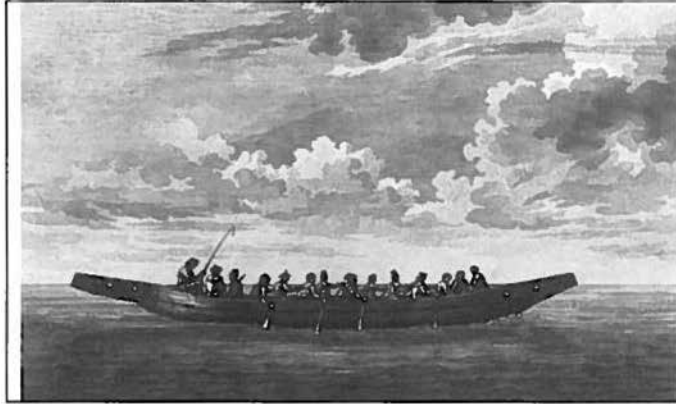
Luke Decker, USDA Forest Service

Rodney Flynn, Alaska Department of Fish and Game

Don Martin, USDA Forest Service

Ryan Scott, Alaska Department of Fish and Game

Tom Schumacher, Alaska Department of Fish and Game



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Michael Bangs, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

RAC SE17019.DP

AUG 0 4 2017

Mr. Bruce Dale, Director
Division of Wildlife Conservation
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, Alaska 99518-1599

Dear Mr. Dale:

It was a pleasure having you speak at our March 2017 meeting and to receive a department level view of wolf issues on Prince of Wales Island (POW). As you witnessed, wolf management in this area of Alaska is important, and the Southeast Alaska Subsistence Regional Advisory Council (Council) is committed to exploring options to recommend to the Federal Subsistence Board (Board) to protect this resource while providing rural residents with subsistence opportunities.

On the last day of our meeting, the Council identified specific regional subsistence uses and needs to include in its FY2016 Annual Report to the Board. During the discussion regarding the wolf quota set for Unit 2 on POW, the Council expressed a need for more information regarding the calculations used to set that quota. Specifically, they would like to have information regarding the 50% allowance allocated for other human caused mortality.

The Council working group that crafted some of the wolf proposals noted that the quota allowed up to 20% of the previous season's population for harvest. The Alaska Department of Fish and Game (ADF&G) then applied a 50% reduction of the quota to account for unintended or other human caused mortalities. The Council would request the following information from ADF&G:

Mr. Dale

2

- 1) How did ADF&G come up with using a 50% reduction in the harvest quota to account for the unlawful take or other unintended human caused mortalities? Is this an internal policy or were other parties involved in the decision to use 50%? What efforts, if any, were put forth to include users in determining the Guideline Harvest Level?
- 2) What documentation for unlawful take is available?

The Council would appreciate answers to these questions in order to better understand the wolf matters on POW and the impact this allowance for mortality has on subsistence uses.

The Council appreciates your attention to this issue and looks forward to continue working with you on subsistence matters related to the Southeast Region. Any questions regarding this letter can be addressed directly to me or through our Council Coordinator, DeAnna Perry, at 907-586-7918, or email at dlperry@fs.fed.us.

Sincerely,



Cathy Needham
Vice-Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management
Jennifer Hardin, Subsistence Policy Coordinator, Office of Subsistence Management
George Pappas, Acting Fisheries Division Supervisor, Office of Subsistence Management
Paul McKee, Wildlife Division Supervisor, Office of Subsistence Management
Carl Johnson, Council Coordination Supervisor, Office of Subsistence Management
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game
Administrative Record

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**

WP18–01 Executive Summary	
General Description	Proposal WP18–01 requests that non-Federally qualified users be limited to the harvest of two deer from Federal public lands in Unit 2 and that the season for non-Federally qualified subsistence users be reduced by one week or more. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p>Unit 2 - Deer</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, 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. 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. Unless otherwise restricted, non-Federally qualified users may only hunt on Federal Public Lands in Unit 2 from Aug. 1 – Dec. 24 and can only harvest up to 2 male deer.</i></p> <p style="text-align: right;"><i>July 24–Jan. 31</i></p>
OSM Preliminary Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	

WP18-01 Executive Summary	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	

WP18-01 Executive Summary	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Oppose and 1 Support

DRAFT STAFF ANALYSIS WP18-01

ISSUES

Proposal WP18-01, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that non-Federally qualified users be limited to the harvest of two deer from Federal public lands in Unit 2 and that the season for non-Federally qualified subsistence users be reduced by one week or more.

DISCUSSION

The Council submitted this proposal after hearing testimony during the winter 2017 meeting in Craig, where Federally qualified subsistence users testified that they had a harder time harvesting deer during the 2016 season. As a result, the Council drafted this proposal for consideration. The Council did not identify a specific closure date for non-Federally qualified users in their proposal. During clarification the Council chair suggested using one week from the end of the current State hunting season (December 24) as a starting point.

In regards to adjusting State seasons and harvest limits, Title VIII, Section 815.3 of Alaska National Interest Lands Conservation Act (ANILCA) provides that Federal public lands can be closed to non-subsistence uses when it is necessary to restrict harvest in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population. It is the Board's view that because it has the authority to close non-subsistence uses under these circumstances, it would have the authority to take a lesser action, such as limiting the take of fish and wildlife for non-subsistence use. However, the Board has never exercised authority in this manner.

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. 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.

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, 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. 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. **Unless otherwise restricted, non-Federally qualified users may only hunt on Federal Public Lands in Unit 2 from Aug. 1 – Dec. 24 and can only harvest up to 2 male deer.*** July 24–Jan. 31

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

Federal public lands comprise approximately 72% of Unit 2 and consist of 72% U.S. Forest Service (USFS) managed lands (see **Unit 2 Map**).

Customary and Traditional Use Determinations

Rural residents of Units 1A, 2, and 3 have a customary and traditional use determination to harvest deer in Unit 2.

Regulatory History

Hunting regulations have permitted the harvest of deer in Unit 2 since 1925 (**Table 1**). During this period, season closing dates have varied between November and December, with December 31 being the

Table 1. Regulatory history for Unit 2 deer.

Year	Type of Season	Season	Limit	Conditions and Limitations
1925	Open	Sep. 15–Dec. 16	3	Bucks, 3" antlers or longer
1925–1929	Open	Sep. 1–Nov. 30	3	Bucks, 3" antlers or longer
1930–1941	Open	Aug. 20–Nov. 15	2	Bucks, 3" antlers or longer
1942–1943	Resident	Sep. 16–Nov. 15	2	Bucks, 3" antlers or longer
1942–1943	Non-resident	Sep. 16–Nov. 15	1	Bucks, 3" antlers or longer
1944–1948	Resident	Sep. 1–Nov. 7	2	Bucks, 3" antlers or longer
1944–1948	Non-resident	Sep. 1–Nov. 7	1	Bucks, 3" antlers or longer
1949	Resident	Sep. 1–Nov. 15	2	Bucks, 3" antlers or longer
1949	Non-resident	Sep. 1–Nov. 15	1	Bucks, 3" antlers or longer
1950–1951	Resident	Aug. 20–Nov. 15	2	Bucks, 3" antlers or longer
1950–1951	Non-resident	Aug. 20–Nov. 15	1	Bucks, 3" antlers or longer
1952	Open	Aug. 20–Nov. 22	2	Bucks, 3" antlers or longer
1953–1954	Open	Aug. 20–Nov. 22	3	Bucks, 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	4	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. 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
1963–1967	Open	Aug. 1–Dec. 31	4	4 deer, antlerless deer may be taken Sep. 15–Dec. 31
1968	Open	Aug. 1–Dec. 15	4	4 deer, antlerless deer may be taken Sep. 15–Dec. 15
1969–1971	Open	Aug. 1–Dec. 31	4	4 deer, antlerless deer may be taken Sep. 15–Dec. 31
1972	Open	Aug. 1–Dec. 31	3	3 deer, antlerless deer may be taken Nov. 1–Nov. 30
1973–1977	Open	Aug. 1–Nov. 30	3	1 antlerless deer may be taken Nov. 1–Nov. 30
1978–1984	Open	Aug. 1–Nov. 30	3	Antlered deer
1985–1986	State Subsistence/General	Aug. 1–Nov. 30	3	Antlered deer
1987	State Subsistence/General	Aug. 1–Nov. 30	3	1 antlerless deer may be taken Oct. 10–Oct. 31
1988–2013	State Subsistence/General	Aug. 1–Dec. 31	4	Antlered deer/bucks
1991–1994	Federal Subsistence	Aug. 1–Dec. 31	4	Antlered deer
1995–1997	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
1998–2002	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
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
2010–2014	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

common closing date since 1988. Seasons and harvest limits for subsistence users in Unit 2 are more liberal than they have been since 1925. Federal regulations have allowed the harvest of one female deer in Unit 2 since 1995, as well as the harvest of 5 deer beginning in 2006.

Following years of numerous Unit 2 related deer proposals (>30) 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 regarding the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09 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 5 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 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).

Two proposals were considered for 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 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. 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).

Current Events

The Council has submitted Proposal WP18-02 requesting the customary and traditional use determination for deer in Units 1-5 be changed to all rural residents of Units 1-5. If this change was approved, the number of qualifying hunters for Unit 2 would increase dramatically, which may be contradictory to the intent of Proposal WP18-01.

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 the lactating doe. 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 decrease 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 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).

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. 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.

Recent population indices

There are no methods to directly count deer in southeast Alaska, so the Alaska Department of Fish and Game (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 distribution and density of deer pellets from year to year, 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 (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. Although pellet-group surveys remain the only widely available deer population data, the results should be interpreted with caution. In Unit 2, pellet-group data 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 deep snow winters. 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. No pellet surveys were completed during 2013-2016.

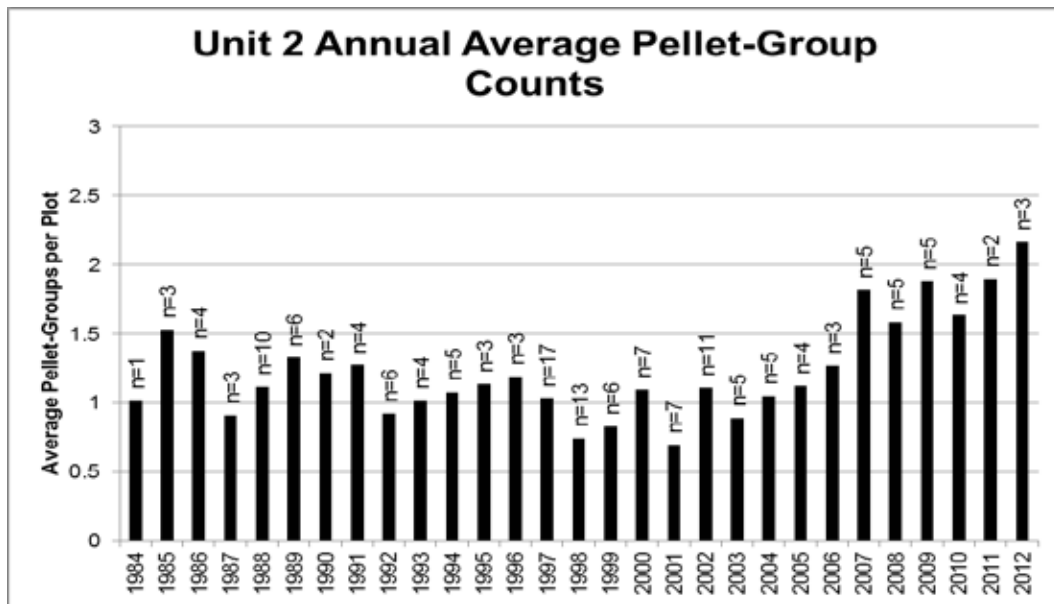


Figure 1. Average pellet-group counts for all of Unit 2 since transects began in 1984 (McCoy 2011). Data labels represent the number of watersheds surveyed that year.

Cultural Knowledge and Traditional Practices

The customary and traditional use determination for deer in Unit 2 includes roughly 11,200 people in 4,700 households living in 19 small communities (**Table 2**). These communities range in population from 20 people or less (Edna Bay, Kasaan, Point Baker, and Kupreanof) to over 1,000 people (Metlakatla,

Table 2. The number of people living in communities included in the customary and traditional use determination for deer in Unit 2, 1960-2010.

Unit	Community	US Census						Number of households
		1960	1970	1980	1990	2000	2010	
		Number of people						
1A	Hyder	32	49	77	99	97	87	47
1A	Metlakatla	1,135	1,245	1,333	1,464	1,375	1,405	469
1A	Saxman	153	135	273	369	431	411	120
2	Coffman Cove	0	0	193	186	199	176	89
2	Craig	273	272	527	1,260	1,397	1,201	523
2	Edna Bay	135	112	6	86	49	42	19
2	Hollis	0	0	0	111	139	112	55
2	Hydaburg	251	214	298	384	382	376	133
2	Kasaan	36	30	25	54	39	49	17
2	Klawock	251	213	318	722	854	755	313
2	Naukat Bay	0	0	0	93	135	113	60
2	Point Baker	0	80	90	39	35	15	8
2	Port Alexander	18	36	86	119	81	52	22
2	Thorne Bay	0	443	377	569	557	471	214
2	Whale Pass	0	0	90	75	58	31	20
3	Kake	455	448	555	700	710	557	246
3	Kupreanof	26	36	47	23	23	27	15
3	Petersburg borough	1,502	2,042	2,821	3,207	3,224	2,948	1,252
3	Wrangell borough	2,165	2,358	2,658	2,479	2,448	2,369	1,053
TOTAL		6,432	7,713	9,774	12,039	12,233	11,197	4,675

NA=not available

Source: ADLWD 2017, ADCCED 2017, and U.S. Bureau of the Census 1995.

Petersburg, and Wrangell). Many were established by Tlingit Indians and are situated at historical village sites, or were established by Haida Indians (Hydaburg) or Tsimshian Indians (Metlakatla). Beginning in the 1970s, timber logging camps sprang up and some have persisted as new communities in Unit 2, such as Thorne Bay and Edna Bay.

Sitka black-tailed deer is the most pursued species of large land mammal in Southeast Alaska. Historical and ethnographic sources indicate deer was one of many sources of rendered oil used in the diet. Deer were reportedly highly prized, very abundant and relatively easy to harvest, and comprised a large part of the traditional food supply (Goldschmidt and Haas 1998 [1946], Kamenskii 1985 [1906], Krause 1970 [1885], Niblack 1970 [1890], Oberg 1973, and Swanton 1908). Tlingits used a word for a peace ambassador or hostage that meant “deer” (*guwakaan*) because of the animals association with meekness (Emmons 1991:351–358).

Based on community household surveys conducted with selected communities 1984–2012, the majority of households in each community used deer during one-year study periods, and a large proportion of households harvested deer (**Appendix A**). Deer harvest levels range from an estimated low of 11 lbs of edible weight per person in Metlakatla in 1984 to a high of 100 lb per person at Edna Bay in 1987. Estimated harvests ranged from a low of 8 deer at Meyers Chuck in 1987 to a high of 2,053 deer at Petersburg in 1987 (ADF&G 2017).

Contemporary hunters employ a variety of access methods such as personal boats including commercial fishing vessels and road vehicles. The Alaska ferry system is often used by hunters from larger communities. Alpine hunts often require overnight camping and considerable hiking. Hunting below the timberline involves tracking, as well as luring deer to clearings (including the edges of clearcuts) with various locally or commercially manufactured calls. Beach hunting commonly is done in early morning or at dusk, or during a minus tide when deer feed on beach vegetation. Hunting on beaches involves “beach combing” by boat, or hiking under cover of the fringe forest. Opportunistic harvest is also undertaken while travelling by boat along the coastline (Ellanna and Sherrod 1987, Sill and Koster 2012:405, and Doerr and Sigman 1986).

Harvest History

Harvest data reported below are provided by ADF&G (Schumacher 2017, pers. comm.) 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 used 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 2011).

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 2005–2015 can be found in **Figure 2**, with harvest by month being found in **Table 3**. The estimated total annual harvest has averaged 3,467 deer, with an average of 100 females during this period. Harvests have been at or above ADF&G’s Unit 2 harvest objective since 2005 (Bethune 2011).

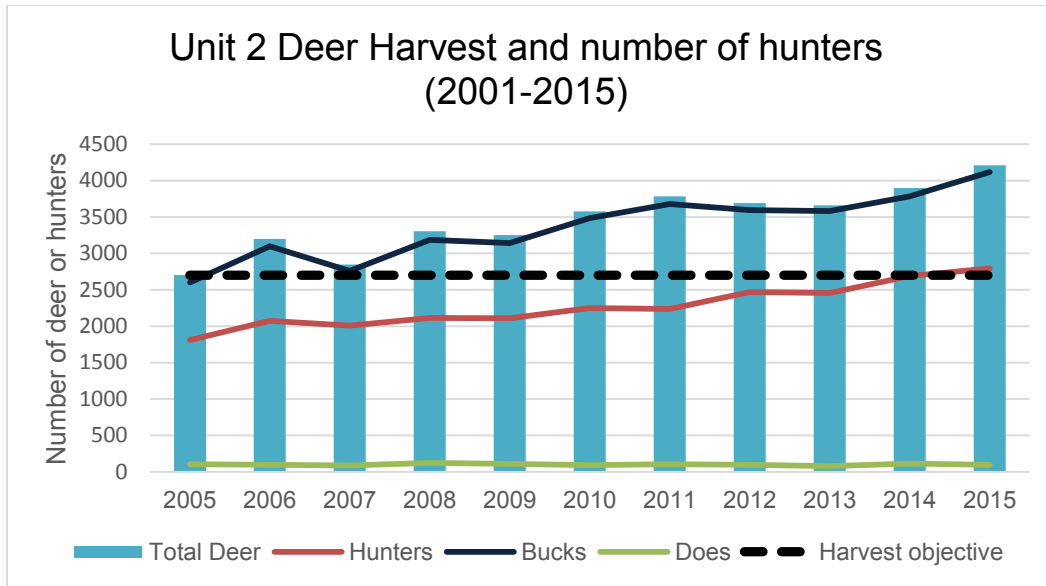


Figure 2. Estimated total deer harvest and number of hunters in Unit 2 from 2001-2015 (Schumacher 2017 pers. comm.).

Table 3. Deer harvest by month in Unit 2, 2005-2016 (Schumacher 2017, pers. comm.).

Reg year	July	Aug	Sept	Oct	Nov	Dec	Jan	Totals
2005	210	485	393	503	895	76		2562
2006	192	501	459	541	1333	152		3178
2007	128	428	300	450	1217	121		2644
2008	116	494	362	522	1525	167		3186
2009	122	488	263	510	1655	183		3221
2010	156	471	281	595	1669	178		3350
2011	230	632	295	595	1932	197		3881
2012	143	460	302	556	1878	315		3654
2013	163	484	282	460	2105	174		3668
2014	159	590	281	562	2085	188		3865
2015	186	633	347	694	2107	212		4179
2016*	169	518	306	633	1573	161	32	3392

*2016 numbers are preliminary

Federally qualified subsistence users tend to harvest the most deer in the unit (**Figure 3**) which has ranged from 55-72% 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 seemed to remain stable for Unit 2 residents since 2005 (**Figure 4**). The average number of days it takes to harvest a deer (**Figure 5**) 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.

Hunters from Unit 2 had a higher success rate than other hunters with an average success rate of 83% during this period, with 73% of the successful hunters harvesting between one to three deer (**Table 4**). Hunters residing in Unit 1A averaged a 74% success rate during this same period and accounted for an average of 37.8% of the total Unit 2 harvest (**Figure 5**). Effort by those with other Alaskan residency (communities outside of Units 1A, 2 or 3) has occurred and increased from 119 hunters in 2005 to 430 during 2014, with effort typically occurring during the rut in November. It is unknown if this is related to more coverage of Unit 2 from outdoor publications, television shows and word-of-mouth or if it is related to the declines of deer in other areas of the state (Kodiak/Afognak/Raspberry Islands, Prince William Sound, northern Southeast Alaska). Non-resident activity in the unit has increased from 148 hunters in 2006 to 333 in 2015. This increase may be related to changes in black bear hunting opportunity in Unit 2. The Craig ADF&G office has noted an increase in non-resident inquiries related to deer hunting (Bethune 2013). It is unknown how the recent increases in license and tag fees established by the State Legislature passing House Bill 137 in October 2016 will affect non-resident effort.

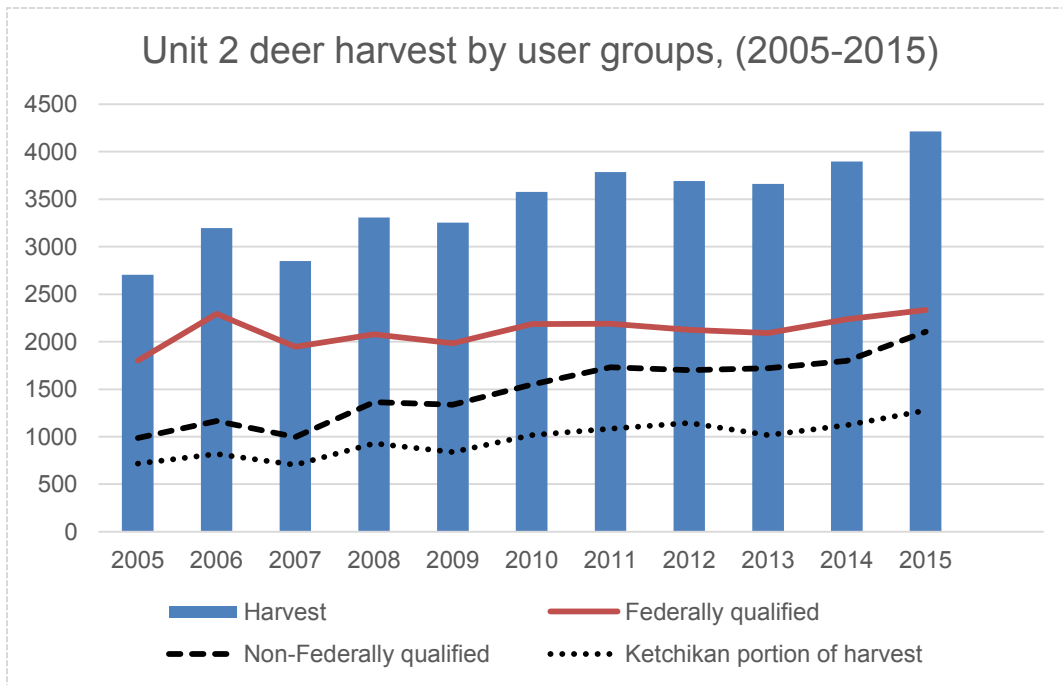


Figure 3. Estimated deer harvest by user type, 2005-2015 (Schumacher, 2017, pers. comm.).

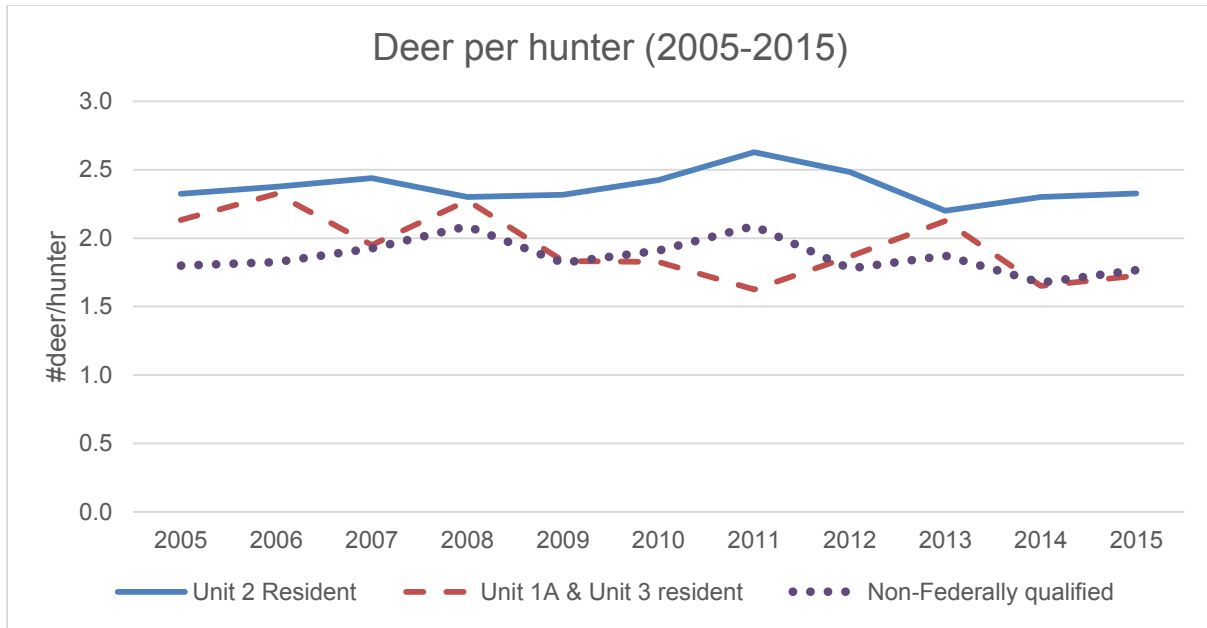


Figure 4. Deer per hunter by type of hunter, 2005-2015 (Schumacher, 2017, pers. comm.).

Table 4. Percentage of hunters by number of deer reported harvested (Schumacher 2017, pers. comm.).

	No deer	1 deer	2 deer	3 deer	4 deer	5 deer	>5 deer
Unit 2 Residents	13	32	24	17	11	3	0
Other Federally qualified	25	21	29	16	10	0	0
Non-Federally qualified	30	32	19	11	8	0	0

Despite current abundant deer populations, historically high harvest, liberalized seasons and harvest limits, there are continued concerns from members of the subsistence community regarding their inability to meet their subsistence needs. The biggest concern is the perception of increased crowding 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 in Unit 2. The ATM may have increased numbers of 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).

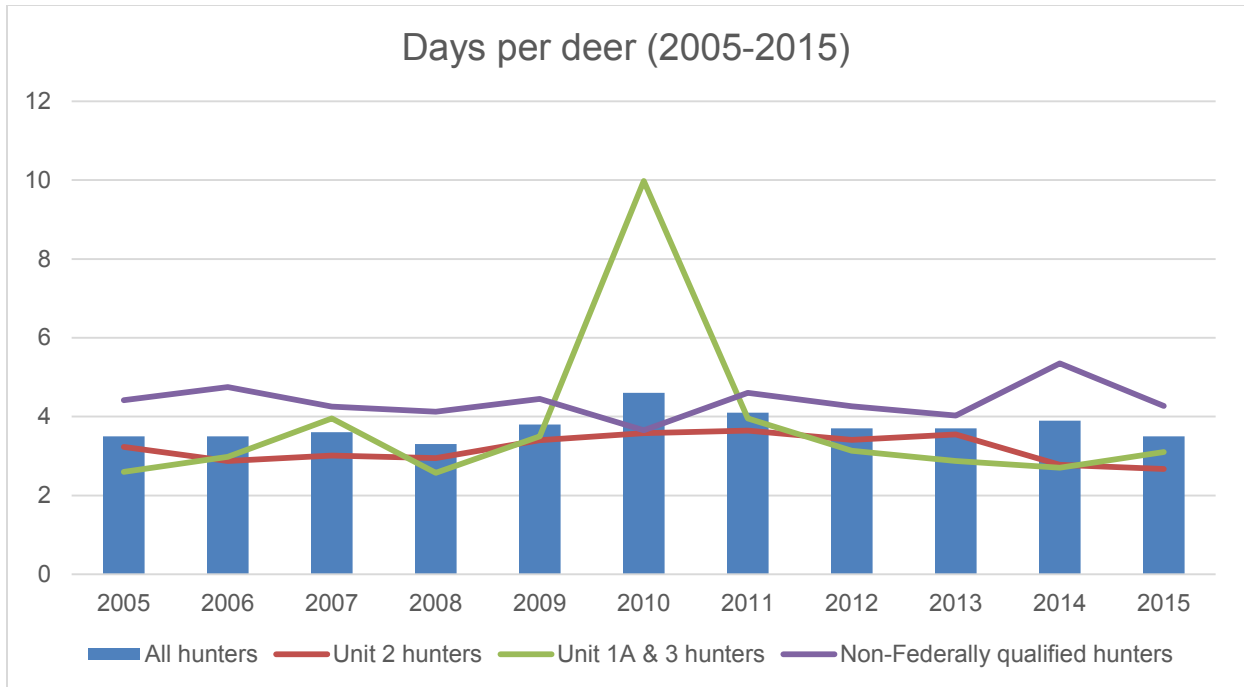


Figure 5. Days per deer for successful hunters to harvest a deer in Unit 2 by hunter residency, 2005-2015 (Schumacher, 2017).

Recent trends with milder weather patterns over the past several years may be affecting deer hunter success. With less snow at higher elevations later in the season, deer may not be concentrated in the lower elevation areas than they have in past years. Another possibility affecting hunter success during the 2016 season was what appeared to be an earlier rut in 2016, which peaked during the last week of October, about a week and a half earlier than the typical timing for the unit. While more effort may be needed to find deer in these situations, it may create the perception that deer populations are lower than they actually are.

Effects of the Proposal

If adopted, this proposal would reduce the harvest limit and the harvest season for non-Federally qualified users hunting deer on Federal public lands in Unit 2. The proposal would not change the harvest limit under State hunting regulation or affect harvests occurring on State and private lands.

If adopted, this proposal could increase harvest opportunity for Federally qualified users hunting deer on Federal public lands in Unit 2. While a reduction in the harvest limit for non-Federally qualified users may make more deer available to harvest, shortening the season in December may not benefit subsistence users as harvest data indicates very few deer are harvested during this time frame by both user groups.

If adopted, the proposal would not have any positive effects on deer populations in Unit 2, as deer populations are affected by available habitat and winter weather conditions.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP18-01.

Justification

Title VIII of ANILCA allows the Board to restrict non-Federally qualified user harvest limits on Federal public lands. Reducing the harvest limit for non-Federally qualified users in Unit 2 as allowed under §815 (3) of ANILCA is not necessary at this time for conservation or to meet subsistence needs. Deer harvest in Unit 2 has been on the increase with Federally qualified subsistence users harvesting the majority of the deer in Unit 2. Unit 2 hunters have averaged 2.3 deer per hunter, during the period of 2005-2015, which is higher than the 1.9 deer per hunter average for non-Federally qualified users. Harvest data also show a decrease in hunt days per deer for Federally qualified subsistence users, which is almost half of the time needed for non-Federally qualified users to harvest a deer. Hunt performance data, as well as deer pellet monitoring, anecdotal accounts and harvest data, suggest the deer population in Unit 2 is currently stable or growing. Harvest data for non-Federally qualified users suggest that the majority of this user group (81%) harvests two deer or less per hunter. The data do not support the perception that needs of Federally qualified users are not being met.

The Unit 2 Federal season currently provides Federally qualified subsistence users the following priorities: eight additional hunting days in July prior to the start of the State season, a closure to non-Federally qualified users for 15 days in August on the majority of the Federal public lands on Prince of Wales Island, a more liberal harvest limit of five deer, opportunity to harvest a female deer after October 15 and 31 additional days in January. Current harvest data suggest these priorities are benefitting Federally qualified subsistence users. A reduction to non-qualified subsistence users is not necessary at this time.

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WRITTEN PUBLIC COMMENTS

RECEIVED

JUL 28 2017

 PO Box 19233
 Thorne Bay, AK
 July 24, 2017

Dear Subsistence Board,

Please consider my comments to your proposed regulations for hunting in Unit #2. I have hunted POW for over 35 years as a full time Resident and Retired 64 year old. The harvest needs to be reduced as competition from outside hunters continues to be an issue - Also the doe season does not make sense for the health of our herd. Here's my views on the following proposals: There are 2 adults in my household.

- WP18-01 - yes adoption
- WP18-02 - NO "
- WP18-07 - YES "
- WP18-08 - NO "

Thanks you for your consideration of my comments. Have a safe day!



Barner Freedman
 PID# P133161
 LOT481 Block10
 Thorne Bay subdivision -



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

APPENDIX A

Appendix Table A-1. The harvest and use of deer by communities in the customary and traditional use determination for deer in Unit 2, based on household harvest surveys.

Unit	Community	Study year	Percentage of households:					Deer harvest		
			Use deer	Attempt harvest deer	Harvest deer	Give away deer	Receive deer	Esti- mated harvest deer	95% con- fidence interval +/- %	Per person harvest lb
			%	%	%	%	%			
1A	Metlakatla	1987	69		16	12	60	207	74	10.7
1A	Meyers Chuck	1987	80		50	0	60	8	0	21.3
1A	Saxman	1987	58		23	11	42	54	44	16.6
1A	Saxman	1999	63	36	23	27	47	198	35	27.6
2	Coffman Cove	1987	73		57	22	27	139	30	59.6
2	Coffman Cove	1998	70	88	62	24	18	146	20	54.7
2	Craig	1987	80		52	25	42	600	30	40.6
2	Craig	1997	76	59	47	24	37	963	19	43.7
2	Craig	1999	76	64	41	22	42	743		32.6
2	Edna Bay	1987	95		85	45	60	96	8	110.3
2	Edna Bay	1998	92	92	83	8	42	57	41	86.5
2	Hollis	1987	67		40	16	32	38		37.9
2	Hollis	1998	57	63	39	11	26	60	25	31.1
2	Hydaburg	1987	78		37	27	55	203	39	42.8
2	Hydaburg	1997	69	45	33	28	49	175	39	34.7
2	Hydaburg	2012	88	63	52	54	54	283	35	68.1
2	Kasaan	1987	86		43	21	64	20	0	40.0
2	Kasaan	1998	86	64	57	43	29	37	35	68.2
2	Klawock	1984	81	61	56	36	39	204	33	34.5
2	Klawock	1987	74		52	21	38	445	32	45.0
2	Klawock	1997	72	59	43	26	36	503	28	47.6
2	Klawock	1999	78	59	48	20	46	475		39.3
2	Naukatl Bay	1998	68	66	52	18	26	83	19	45.4
2	Point Baker	1987	95		63	37	53	39	0	89.1
2	Point Baker	1996	94	75	50	25	56	27	27	46.0
2	Port Protection	1987	84		36	16	64	29	20	40.0
2	Port Protection	1996	92	68	56	36	64	115	40	94.4
2	Thorne Bay	1987	75		58	28	37	220	24	36.7
2	Thorne Bay	1998	54	71	42	5	16	209	24	32.2
2	Whale Pass	1987	78		67	6	28	32	0	50.2
2	Whale Pass	1998	67	60	47	27	40	35	43	50.7
2	Whale Pass	2012	76	76	57	19	19	50	30	72.6
3	Beecher Pass	1987	100		80	40	40	41	70	73.9
3	Kake	1985	70	44	39	21	39	208	29	26.6
3	Kake	1987	78		42	22	57	310	44	38.6
3	Kake	1996	80	52	49	23	37	464	32	49.7
3	Petersburg	1987	70		39	30	40	2,053	40	43.9
3	Petersburg	2000	40	34	19	8	22	505	44	13.7
3	Wrangell	1987	63		28	13	46	725	51	20.4
3	Wrangell	2000	48	38	24	18	29	694	48	28.3

Black cell=question was not asked or information is not available.

Source: ADF&G 2017c.

WP18–02 Executive Summary	
General Description	<p>Proposal WP18–02 requests to modify the customary and traditional use determination for deer in Southeast Alaska Units 1– 5 so that all rural residents of Units 1–5 are eligible to hunt deer under Federal regulations. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i></p>
Proposed Regulation	<p>Customary and Traditional Use Determination—Deer</p> <p><i>Units 1–5 Residents of Units 1–5</i></p> <p><i>Unit 1A Residents of Units 1A and 2.</i></p> <p><i>Unit 1B Residents of Units 1A, 1B, 2, and 3.</i></p> <p><i>Unit 1C Residents of Units 1C, 1D, Hoonah, Kake, and Petersburg.</i></p> <p><i>Unit 1D No Federal subsistence priority.</i></p> <p><i>Unit 2 Residents of Units 1A, 2, and 3.</i></p> <p><i>Unit 3 Residents of Units 1B, 3, Port Alexander, Port Protection, Pt. Baker, and Meyers Chuck.</i></p> <p><i>Unit 4 Residents of Unit 4, Kake, Gustavus, Haines, Petersburg, Pt. Baker, Klukwan, Port Protection, Wrangell, and Yakutat.</i></p> <p><i>Unit 5 Residents of Yakutat</i></p>
OSM Preliminary Conclusion	Support
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	

WP18-02 Executive Summary	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	

WP18-02 Executive Summary	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	2 Oppose

**DRAFT STAFF ANALYSIS
WP18-02**

ISSUES

Proposal WP18–02, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests to modify the customary and traditional use determination for deer in Southeast Alaska Units 1– 5 by including all rural residents of Units 1–5.

DISCUSSION

The proponent states that customary and traditional use determinations for deer in Units 1–5 need to be reviewed because they are restricting subsistence uses. 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 *koo.éex*’ (potlatches) and other cultural celebrations, to return to traditional clan and *kwaan* (tribe) territories, and for other reasons. At these times, they need to be able to continue long-standing patterns of hunting. Currently, they are not able to because of a patchwork of customary and traditional use determinations, a legacy of State subsistence management in the 1980s. The proponent states this history has created an unnecessary and confusing regulatory complexity making it difficult for subsistence users to know where they can hunt deer under Federal regulations. The proponent asks for these changes to improve regulatory clarity, subsistence opportunity, and deer management efficiency.

The proponent states that 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 proponent states that this proposal will align customary and traditional use determinations for deer in Units 1–5 based on current policies of the Federal Subsistence Management Program. The Council intends to submit more proposals to broaden customary and traditional use determinations in its region. It 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 Alaska National Interest Lands Conservation Act (ANILCA) Section 804 procedures can be used to allocate scarce resources.

It is important to know that a significant factor affecting hunting effort in Southeast Alaska is the heavily populated Juneau road system (31,000 people), and Ketchikan road system (13,500 people) (ADLWD 2017). Federal regulations recognize residents of these areas as nonrural and prohibit them from participating in Federal hunting, fishing, and trapping seasons. Therefore, a description of their customary and traditional uses of deer is not included in the analysis.

Glacier Bay National Park constitutes one quarter to one third of the land mass in each of Units 1C, 1D, and 5A. Federal public lands within the Park are closed to all hunting, and wildlife management in the Park is not in the Federal Subsistence Board’s (Board’s) jurisdiction.

The customary and traditional uses of deer by residents of all the communities in the proposal have been recognized by the Board. Consequently, the focus of the analysis is expanding existing customary and traditional use determinations geographically to include all of Southeast Alaska Units 1–5.

Existing Federal Regulation

Customary and Traditional Use Determination—Deer

- Unit 1A* Residents of Units 1A and 2.
- Unit 1B* Residents of Units 1A, 1B, 2, and 3.
- Unit 1C* Residents of Units 1C, 1D, Hoonah, Kake, and Petersburg.
- Unit 1D* No Federal subsistence priority.
- Unit 2* Residents of Units 1A, 2, and 3.
- Unit 3* Residents of Units 1B, 3, Port Alexander, Port Protection, Pt. Baker, and Meyers Chuck.
- Unit 4* Residents of Unit 4, Kake, Gustavus, Haines, Petersburg, Pt. Baker, Klukwan, Port Protection, Wrangell, and Yakutat.
- Unit 5* Residents of Yakutat

Proposed Federal Regulation

Customary and Traditional Use Determination—Deer

- Units 1–5*** Residents of Units 1–5
- ~~*Unit 1A* Residents of Units 1A and 2.~~
- ~~*Unit 1B* Residents of Units 1A, 1B, 2, and 3.~~
- ~~*Unit 1C* Residents of Units 1C, 1D, Hoonah, Kake, and Petersburg.~~
- ~~*Unit 1D* No Federal subsistence priority.~~
- ~~*Unit 2* Residents of Units 1A, 2, and 3.~~
- ~~*Unit 3* Residents of Units 1B, 3, Port Alexander, Port Protection, Pt. Baker, and Meyers Chuck.~~
- ~~*Unit 4* Residents of Unit 4, Kake, Gustavus, Haines, Petersburg, Pt. Baker, Klukwan, Port Protection, Wrangell, and Yakutat.~~
- ~~*Unit 5* Residents of Yakutat~~

Extent of Federal Public Lands

Table 1. Federal public lands in the Southeast Alaska Region, Units 1–5.

Management unit	Percentage Federal public lands	Percentage of Federal public lands managed by each agency
1A	91.3%	91.3% U.S. Forest Service
1B	98.1%	98.1% U.S. Forest Service
1C	95.5%	62.6% U.S. Forest Service 32.9% National Park Service ^a
1D	43.8%	24.9% National Park Service ^a 18.9% U.S. Forest Service
2	74.0%	74.0% U.S. Forest Service
3	90.6%	90.6% U.S. Forest Service
4	92.2%	92.2% U.S. Forest Service
5A	94.5%	63.3% U.S. Forest Service 31.2% National Park Service ^a
5B	96.0%	93.8% National Park Service 2.1% Bureau of Land Management 0.1% U.S. Forest Service

^a Glacier Bay National Park, closed to subsistence

Federal public lands comprise approximately 88% of Southeast Alaska Units 1–5. Details by unit are shown in **Table 1**, above. 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. National Park Service lands in Units 1C, 1D, and most of Unit 5A are within Glacier Bay National Park that are closed to subsistence (see **Unit 1–5 Maps**).

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 permanent regulations (72 FR 22961; May 29, 1992). The Board adopted “no Federal subsistence priority” for deer in Unit 1D. The State did not recognize customary and traditional uses of deer in Unit 1D, and deer generally are not present in Unit 1D.

In 1996, responding to Proposals P96-004 and C171 submitted by the Council and Paul J. Trollan, the Board followed the recommendation of the Council and modified the customary and traditional use determination for deer in Unit 4, adding residents of the Yakutat Borough. The Council said “Yakutat, the only traditional community in Unit 5, has traditionally used Unit 4 for deer. This is not the case for other Unit 5 residents” (OSM 1996a:28). The Board said the term Yakutat referred to the City and Borough of

Yakutat, and the Yakutat city boundary itself did not include all of the residents of the community generally recognized as Yakutat (OSM 1996b). The Interagency Staff Committee said in its justification,

Deer has long been an important resource to residents of Unit 5. In the past, when no deer were available in the area, Yakutat residents obtained deer by trade. After deer were introduced in Unit 5, local residents hunted them. The modest deer harvests recorded in Yakutat are more attributable to regulatory restrictions and low deer population than to lack of desire for deer. Yakutat residents have historically traveled to Unit 4 to hunt deer. Yakutat should therefore be included among those having customary and traditional use eligibility for deer in Unit 4 (OSM 1996a:20).

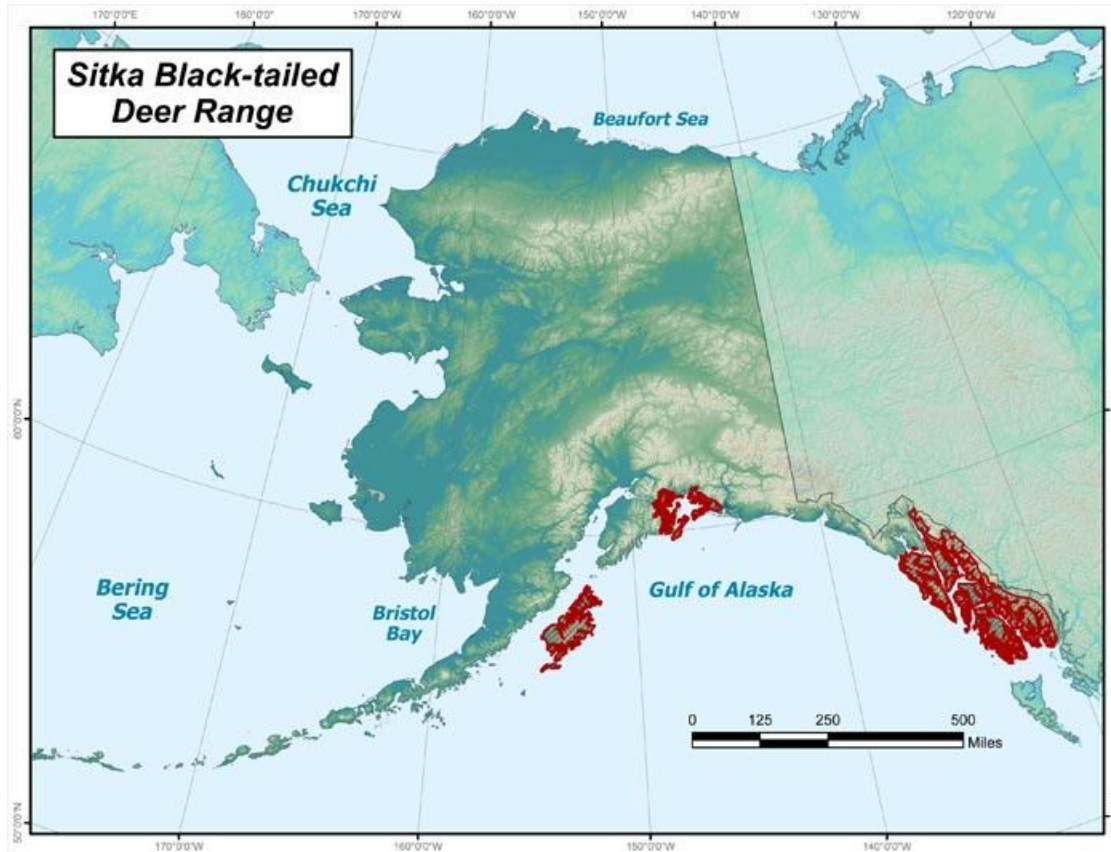
In 1998, responding to Proposals P98-005 and 006 submitted by the Stikine Ranger District, the Board followed the recommendation of the Council and modified the customary and traditional use determination for deer in Unit 1C adding Kake and Petersburg, but to all of Unit 1C instead of the smaller area proposed. The Board stated that modifying Proposal P98-006 to include both Kake and Petersburg in the customary and traditional use determination for all of Unit 1C would meet the intent of the proposal. The Board said it included Kake because of the extension of the Kake Tlingit's traditional use area into Unit 1C and because of documented recent hunting effort for deer in the unit. Petersburg was included because of residents' historic and contemporary pattern of dependence on deer, and their reported deer harvests in the unit (OSM 1998a:75).

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. In April 2014, as part of its review of the process, the Council sent a letter to the Board requesting an analysis of the effects of possible changes to the customary and traditional use determination process. The Council observed that some customary and traditional use determinations have resulted in unnecessary closures to other rural residents when no concerns for the viability of a resource population have existed and that if these concerns did exist, there was already a process in regulation to restrict who can hunt. The process involves a determination of who is most customarily dependent on the resource based on three criteria found in ANILCA Section 804. The Office of Subsistence Management reported back to the Council in winter 2015 in a briefing that was presented to all 10 Regional Advisory Councils (OSM 2015). The briefing indicated that Councils have recommended, and the Board has adopted, determinations that include entire management units or entire management areas when residents of a community have demonstrated taking fish or wildlife in only a portion of a management unit or a management area. The Council has not submitted a request to the Secretary of the Interior to modify the customary and traditional use determine process in Federal regulations. Instead, its stated intent is to submit regulatory proposals to the Board requesting to broaden the patchwork of customary and traditional use determinations that currently exist in Southeast Alaska.

Background

Deer are indigenous to most of Southeast Alaska (ADF&G 2017a, Doerr and Sigman 1986, **Map 1**). Paleontological remains from over 5,000 years ago on Prince of Wales Island include deer, indicating the

potential for very long-term human use of deer in southeast Alaska (Klein 1965). “Winter weather, predation, and removal of winter habitat through clearcut logging have the greatest effects on deer population dynamics” (Lowell 2015a:2-4).



Map 1. The range of Sitka black-tailed deer in Alaska (ADF&G 2017a)

Deer were transplanted to the Taiya Valley near Skagway, in Unit 1D between 1951 and 1956 but have not remained consistently at harvestable levels (Burris and McNight 1973, Doerr and Sigman 1986).

Deer are not indigenous to the Yakutat area. Sell explains further:

Deer were introduced to Yakutat Bay islands in 1934, when 7 does and 5 bucks were released (Paul 2009 *in original*). These animals established a small population that persists on islands and along the eastern mainland of Yakutat Bay. Heavy snowfall and predators limit deer densities, but the population has supported small harvests over the years. Most deer are taken incidentally. There is little potential for this herd to increase because of the extreme climatic conditions and limited habitat. Due to deer declines in the 1970s and a virtual cessation of harvest, the Unit 5 season was closed in July 1980. By the end of the

1980s, deer had recovered to some degree, and public requests for an open season were heard. In 1991 the Board of Game instituted a limited hunt in Unit 5A, with a 1-month bucks-only season. Since then, small numbers of deer have been taken in most years, including some reports of illegal harvest (Sell 2013:7-1).

Community Characteristics

The rural area of Southeast Alaska is comprised of about 32 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 Indians and are situated at historical village sites, or were established by Haida Indians (Hydaburg) 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 during every decade of the 20th century. Beginning in the 1970s, timber logging camps sprang up and some have persisted as new communities, such as Game Creek, Thorne Bay, and Edna Bay. 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 26,295 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.

Eight Factors for Determining Customary and Traditional

A community or area's customary and traditional use is generally exemplified through the eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use 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.

Table 2. The number of people in Southeast Alaska communities, 1960-2010.

Unit of residence	Community	US Census						
		1960	1970	1980	1990	2000	2010	
		Number of people						
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	1,000	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 Alexander	18	36	86	119	81	52	22
	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
	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
TOTAL		13,102	17,774	22,244	26,388	27,580	26,295	10,798

NA=not available

Italic=Estimated, data not available.

Source: ADLWD 2017, ADCCED 2017, and U.S. Bureau of the Census 1995.

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 for restricting harvest. If a conservation concern exists for a particular population of fish or wildlife, the Board addresses that concern through the imposition of harvest limits, season restrictions or Section 804 subsistence user prioritization rather than through adjustments to customary and traditional use determinations.

Sitka black-tailed deer is the most pursued species of large land mammal in Southeast Alaska. From 2014 to 2016, an annual average of 8,960 hunters harvested 11,463 deer in Southeast Alaska, based on the Alaska Department of Fish and Game (ADF&G) harvest reporting database (ADF&G 2017b). The majority of the annual harvest occurred in Unit 4 (Admiralty, Baranof and Chichagof Islands; over 50%) and Unit 2 (Prince of Wales Island, over 25%). The majority of the reported harvest in Southeast Alaska has been by rural residents of Southeast Alaska (Bethune 2015, Porter 2015, Lowell 2015a and 2015b, Mooney 2015, Sell 2013 and 2015).

Effects of non-Federally qualified users hunting for deer are most pronounced in Units 1A, 1C, and 2. The majority of the deer harvest in Unit 1A is by Ketchikan residents because of their close proximity and easy access to hunting areas. Many Ketchikan hunters also search for deer in Unit 2 on Prince of Wales Island, and from 2002 through 2014, Ketchikan residents represented 29% of the average annual number of hunters and 32% of the annual average deer harvest in Unit 2 (Bethune 2015). The majority of the deer harvest in Unit 1C occurs on Douglas Island, which is used by many Juneau residents because of its proximity to Juneau, accessibility by road, and higher density of deer (Sell 2015).

Community-based household surveys were conducted in 31 rural Southeast Alaska communities in 1987 and 26 rural communities from 1996 to 2000 (see **Appendix Table A-1**). The harvest of deer was estimated by community and expressed as a range; adding up the midpoint of the ranges totals 11,456 deer harvested in 1987 by 31 rural Southeast Alaska communities. The number of deer harvested by community ranged from zero at Hyder and Yakutat to 3,783 deer at Sitka. The harvest of deer in pounds of edible weight per person ranged from zero at Yakutat and Hyder to 136 lb per person at Tenakee Springs. For the period 1996–2000, the midpoint of the ranges totals 11,787 deer harvested by 26 rural Southeast Alaska communities. The number of deer harvested by community ranged from 22 deer at Yakutat to 4,733 deer at Sitka. The harvest of deer in pounds of edible weight ranged from 3 lb per person at Yakutat to 94 lb per person at Port Protection.

Community deer harvest areas may extend beyond traditional kwaan and contemporary community use areas for various reasons such as availability of faster, larger boats, or in response to lack of deer or local closures by ADF&G management (Cohen 1988:47–52, Ellanna and Sherrod 1986, Firman and Bosworth 1990, Gmelch and Gmelch 1983, Sill and Koster 2017a and 2017b, Smythe 1988). Doerr and Sigman's (1986) findings of research they conducted in the 1980s stated:

Hunter surveys have shown that when deer populations are high around a community most of the community deer harvest occurs within about 30 miles of the community. When deer populations decline in the vicinity of the community, some hunters travel to other areas where deer populations are abundant and/or seasons are more liberal (e.g., Petersburg and Wrangell hunters have increased their hunting efforts in GMU 4 since deer have declined in GMU 3) (Doerr and Sigma 1986:57).

One effect of the Federal regulations in Southeast Alaska has been to implement earlier or later seasons and more liberal harvest limits than are allowed under State regulations in some areas. Extended deer hunting seasons occur in Units 1A, 2, and 4. Deer harvest limits more liberal than under State regulations occur in Units 1C, 2, and 4 (see **Table 3** and **Table 4**).

Hunters in some communities, especially where deer populations are low, travel to other areas to hunt. Deer have been generally absent from Unit 1D, although historically deer were occasionally taken when encountered. Residents of Unit 1D (including residents of the communities of Haines, Klukwan, and Skagway) have traveled to other areas to hunt deer (Doerr and Sigman 1986, Sill and Koster 2017a).

Since the introduction of deer to the Yakutat area, and possibly before that, Yakutat residents have sought to hunt and use deer. During times when deer have not been available near Yakutat, residents have traveled to other areas where the deer is available. Yakutat hunters have commonly gone to Units 2 and 4, when deer were plentiful there, and it is reasonably accessible to Yakutat (Mills and Firman 1986, Sill et al. 2017). The modest deer harvests recorded in Yakutat are more attributable to regulatory restrictions and low deer populations than to lack of desire for deer.

Contemporary hunters employ a variety of access methods such as personal boats, including commercial fishing vessels, and road vehicles. The Alaska ferry system is often used by hunters from larger communities. Alpine hunts often require overnight camping and considerable hiking. Hunting below the timberline involves tracking, as well as luring deer to clearings (including the edges of clearcuts) with various locally or commercially manufactured calls. Beach hunting commonly is done in early morning or at dusk, or during a minus tide when deer feed on beach vegetation. Hunting on beaches involves “beach combing” by boat, or hiking under cover of the fringe forest. Opportunistic harvest is also undertaken while travelling by boat along the coastline (Doerr and Sigman 1986, Ellanna and Sherod 1987, George and Bosworth 1988, George and Kookesh 1982, and Sill and Koster 2012:405,).

Before the introduction of deer in their area, Yakutat residents were familiar with deer from travel and trade with other Alaska Native groups. For example, like other Tlingits, Yakutat Tlingits used a word for a peace ambassador or hostage that meant “deer” (*kuwakan*), because of the animals association with meekness (de Laguna 1972:40; Emmons 1991:351–358; and Swanton 1908:447, 451). In the past, although deer were not available in the vicinity, Yakutat residents were able to trade for deer meat, skins, and other products with relatives or trading partners in other locations. With the advent of deer in the Yakutat area, it became practical to hunt deer for potlatches and other ceremonies, as well as for everyday use.

Table 3. Federal deer hunting regulations in Southeast Alaska, 2016/17.

FEDERAL HUNTING REGULATIONS		
DEER		
Management Unit	Harvest Limit	Season
Unit 1A	4 antlered deer ^a	Aug. 1–Dec. 31
Unit 1B	2 antlered deer ^a	Aug. 1–Dec. 31
Unit 1C	4 deer; however, female deer may be taken only from Sept. 15–Dec. 31	Aug. 1–Dec. 31
Unit 1D		No Federal open season
Unit 2	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. <i>Federal public lands of Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of Aug. 1–15 except by Federally qualified subsistence users hunting under these regulations.</i>	July 24–Jan. 31
Unit 3 Mitkof Island, Woewodski, and Butterworth Islands	1 antlered deer	Oct. 15–Oct. 31
Unit 3 that portion of Kupreanof Island on the Lindenberg Peninsula east of Portage Bay-Duncan Canal Portage.	1 antlered deer	Oct. 15–Oct. 31
Unit 3 remainder	2 antlered deer	Aug. 1–Nov. 30 Dec. 1–31 season to be announced.
Unit 4	6 deer; however, female deer may be taken only from Sept. 1–Jan. 31.	Aug. 1–Jan. 31
Unit 5A	1 buck	Nov. 1–30
Unit 5B		No open season

^a There are two mistakes in the Federal regulation book distributed to the public, which describes harvest limits as any deer.

Table 4. State of Alaska deer hunting regulations in Southeast Alaska, 2017/18.

STATE OF ALASKA HUNTING REGULATIONS		
DEER		
Management Unit	Harvest Limit	Season
Unit 1A Cleveland Peninsula south of the divide between Yes Bay and Santa Anna Inlet	2 bucks	Aug. 1–Nov. 30
Unit 1A Remainder	4 bucks	Aug. 1–Nov. 30
Unit 1B	2 bucks	Aug. 1–Dec. 31
Unit 1C Douglas, Lincoln, Shelter, and Sullivan Islands	4 bucks	Aug. 1–Sept. 14
	4 deer	Sept. 15–Dec. 31
Unit 1C Remainder	2 bucks	Aug. 1–Dec. 31
Unit 1D		No open season
Unit 2	4 bucks	Aug. 1–Dec. 31
Unit 3 Mitkof Island, Petersburg Management Area	2 bucks by bow and arrow only	Oct. 15–Dec. 15
Unit 3 Remainder of Mitkof, Woe-wodski, Butterworth Islands	1 buck	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. 15–Oct. 31
		Nonresidents—No open season
Unit 3 remainder	2 bucks	Aug. 1–Nov. 30
Unit 4 Chichagof Island east of Port Frederick and north of Tenakee Inlet including all drainages into Tenakee Inlet	3 deer total: Bucks	Aug. 1–Sept. 14
	Any deer	Sept. 15–Dec. 31
Unit 4 remainder	4 deer total: Bucks	Aug. 1–Sept. 14
	Any deer	Sept. 15–Dec. 31
Unit 5A	1 buck, youth hunt only	Sept. 15–31
	1 buck	Nov. 1–30
Unit 5B		No open season

Historical and ethnographic sources indicate harvest and use of deer (*guwakaan* or *kuwakaan*) by Tlingit, Haida, and Tsimshian residents of Southeast Alaska. Deer was one of many sources of rendered oil used in the diet. Deer was reportedly highly prized, very abundant and relatively easy to harvest, and comprised a large part of the traditional food supply (Emmons 1991; Goldschmidt and Haas 1998 [1946]; Kamenskii 1985 [1906]; Krause 1970 [1885]; Niblack 1970 [1890]:279, 300–301; and Oberg 1973:71). Where deer was not available, venison was obtained through trade networks (Jacobs and Jacobs 1982, Niblack 1970 [1890]:338, and Oberg 1973:108).

Contemporary users of deer in Southeast Alaska boil, roast, fry, or barbeque fresh venison. They preserve the meat by freezing, canning, drying, or smoking it. Venison is sometimes ground and made into sausage. The liver, heart, and intestines are considered delicacies. Some people still tan and use deer hides (Jacobs and Jacobs 1982).

Effects of the Proposal

If the proposal was adopted, all rural residents of Southeast Alaska would be eligible to harvest deer under Federal regulations in Units 1–5. There would be no effect on people’s ability to hunt deer under State regulations.

If the proposal was not adopted, there would continue to be no Federal priority for rural residents to hunt deer in Unit 1D, and the Board would continue to be unable to adopt Federal deer hunting seasons in Unit 1D. Under Federal regulations, rural residents of Southeast Alaska would be restricted to hunting in only a portion of Southeast Alaska based on the current patchwork of customary and traditional use determinations.

OSM PRELIMINARY CONCLUSION

Support Proposal WP18-02.

Justification

Rural residents of Southeast Alaska Units 1–5 have demonstrated customary and traditional uses of deer 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 for Units 1–5 into permanent regulations (72 FR 22961; May 29, 1992). The Board adopted “no Federal subsistence priority” for deer in Unit 1D because the State did not recognize customary and traditional uses of deer in Unit 1D. There has not been a considerable population of deer in Unit 1D, but deer do inhabit the area (see **Map 1**). Additionally, the customary and traditional use determinations adopted from State regulations have constituted a patchwork of eligibility. This history has created an unnecessary and confusing regulatory complexity in which it has been difficult for subsistence users to know where they can hunt deer under Federal regulations. 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. Expanding Southeast Alaska Units 1–5 customary and traditional use determinations for deer to include all rural residents of Southeast Alaska will allow these uses.

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WRITTEN PUBLIC COMMENTS

RECEIVED

JUL 28 2017

PO Box 19233
Thorne Bay AK
July 24, 2017

Dear Subsistence Board,

Please consider my comments to your proposed Regulations for hunting in Unit #2. I have hunted POW for over 35 years as a full time Resident and Retired 64 year old. The harvest needs to be reduced as competition from outside hunters continues to be an issue - Also the doe season does not make sense for the health of our herd. Here's my views on the following proposals: There are 2 adults in my household.

- WP18-01 - yes adoption
- WP18-02 - NO "
- WP18-07 - YES "
- WP18-08 - NO "

Thanks you for your consideration of my comments. Have a safe day!



Barner Freedman
PID# P133161
LOT 481 Block 10
Thorne Bay subdivision -



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov>

Mon, Jul 17, 2017 at 10:39 AM

To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>

Date: Fri, Jul 14, 2017 at 8:01 AM

Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska

To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

APPENDIX A

Appendix Table A-1. The harvest and use of deer by communities in Southeast Alaska based on household harvest surveys.

Mangement unit of residence	Community	Study year	Percentage of households:					Deer harvest			
			Use deer	Attempt harvest deer	Harvest deer	Give away deer	Receive deer	Estimated harvest of deer	95% confidence interval	Per person harvest in pounds	
			%	%	%	%	%	deer	+/- %	lb	
1A	Hyder	1987	12		0	0	12	0	0	0.0	
	Metlakatla	1987	69		16	12	60	207	74	10.7	
	Meyers Chuck	1987	80		50	0	60	8	0	21.3	
	Saxman	1987	58		23	11	42	54	44	16.6	
		1999	63	36	23	27	47	198	35	27.6	
1C	Gustavus	1987	70		48	27	32	122	25	64.1	
1D	Haines	1983	18	12	6	3	13	108	65	4.5	
		1987	43		15	14	34	313	75	15.4	
		1996	48	15	11	10	43	212	62	7.9	
		2012	30	11	8	8	24	180	64	7.5	
	Klukwan	1983	12	15	3	0	9	2	100	1.3	
		1987	48		12	12	38	21	38	12.8	
		1996	77	29	23	29	65	22	30	15.8	
	Skagway	1987	29		6	3	26	24	66	3.3	
	2	Coffman Cove	1987	73		57	22	27	139	30	59.6
			1998	70	88	62	24	18	146	20	54.7
Craig		1987	80		52	25	42	600	30	40.6	
		1997	76	59	47	24	37	963	19	43.7	
		1999	76	64	41	22	42	743		32.6	
Edna Bay		1987	95		85	45	60	96	8	110.3	
		1998	92	92	83	8	42	57	41	86.5	
Hollis		1987	67		40	16	32	38		37.9	
		1998	57	63	39	11	26	60	25	31.1	
Hydaburg		1987	78		37	27	55	203	39	42.8	
		1997	69	45	33	28	49	175	39	34.7	
		2012	88	63	52	54	54	283	35	68.1	
Klawock		1984	81	61	56	36	39	204	33	34.5	
		1987	74		52	21	38	445	32	45.0	
		1997	72	59	43	26	36	503	28	47.6	
		1999	78	59	48	20	46	475		39.3	
Naukati Bay		1998	68	66	52	18	26	83	19	45.4	
Point Baker		1987	95		63	37	53	39	0	89.1	
		1996	94	75	50	25	56	27	27	46.0	
Port Protection		1987	84		36	16	64	29	20	40.0	
	1996	92	68	56	36	64	115	40	94.4		
Thorne Bay	1987	75		58	28	37	220	24	36.7		
	1998	54	71	42	5	16	209	24	32.2		
Whale Pass	1987	78		67	6	28	32	0	50.2		
	1998	67	60	47	27	40	35	43	50.7		
	2012	76	76	57	19	19	50	30	72.6		

(Continued on next page.)

Appendix Table A-1. The harvest and use of deer by communities in Southeast Alaska based on household harvest surveys (*continued from previous page*).

Mangement unit of residence	Community	Study year	Percentage of households:					Deer harvest		
			Use deer	Attempt harvest deer	Harvest deer	Give away deer	Receive deer	Estimated harvest of deer	95% confidence interval	Per person harvest in pounds
			%	%	%	%	%	deer	+/- %	lb
3	Beecher Pass	1987	100		80	40	40	41	70	73.9
	Kake	1985	70	44	39	21	39	208	29	26.6
		1987	78		42	22	57	310	44	38.6
		1996	80	52	49	23	37	464	32	49.7
	Kasaan	1987	86		43	21	64	20	0	40.0
		1998	86	64	57	43	29	37	35	68.2
	Petersburg	1987	70		39	30	40	2,053	40	43.9
		2000	40	34	19	8	22	505	44	13.7
Wrangell	1987	63		28	13	46	725	51	20.4	
	2000	48	38	24	18	29	694	48	28.3	
4	Angoon	1984	90	63	61	50	45	454	37	58.4
		1987	100		75	40	46	474	30	72.8
		1996	74	50	50	26	49	370	24	50.9
		2012	84	49	45	38	51	218	33	51.0
	Elfin Cove	1987	92		69	46	69	54	35	72.3
	Game Creek	1996	100	50	33	33	100	32	49	40.8
	Hoonah	1985	86	59	52	38	54	584	27	52.2
		1987	94		65	46	48	786	27	89.8
		1996	74	60	56	39	31	829	32	74.5
		2012	77	59	48	40	45	470	22	51.3
	Pelican	1987	91		63	45	59	316		105.5
	Port Alexander	1987	94		66	60	64	144	9	107.8
	Sitka	1987	38		38	0	0	3,783	19	37.5
		1996	62	43	35	22	31	4,733	32	44.4
		2013	56	37	26	21	36	2,501	35	25.4
	Tenakee Springs	1984	83	50	50	42	58	76	57	65.0
1987		87		55	39	45	160	47	135.5	
Whitestone	1996	83	71	71	4	13	101	33	56.9	
5A	Yakutat	1984	20	6	6	8	16	18	100	2.7
		1987	0		0	0	0	0	0	0.0
		2000	23	9	5	7	21	22	51	2.8
		2015	45	35	9	14	37	33	59	2.4

Blank cell=question not asked or information not available.

Source: ADF&G 2017c.

WP18–03 Executive Summary	
General Description	Proposal WP18–03 requests modifying the Federal hunting and trapping seasons in Unit 1 for wolves to match those currently under State regulations. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p>Unit 1A, 1B south of Bradfield Canal and the east fork of the Bradfield River – Wolf (hunting)</p> <p><i>5 wolves</i> <i>Aug. 1–Apr.</i> <i>30May 31</i></p> <p>Unit 1B remainder, 1C, 1D – Wolf (hunting)</p> <p><i>5 wolves</i> <i>Aug. 1 – Apr.</i> <i>30</i></p> <p>Unit 1 – Wolf (trapping)</p> <p><i>No limit.</i> <i>Nov. 1–0</i> <i>Apr. 30</i></p>
OSM Preliminary Conclusion	Support
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	

WP18–03 Executive Summary	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	

WP18-03 Executive Summary	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	4 Oppose

**DRAFT STAFF ANALYSIS
WP18-03**

ISSUES

Proposal WP18-03, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests modifying the Federal hunting and trapping seasons in Unit 1 for wolves to match those currently under State regulations.

DISCUSSION

The proponent seeks to bring Federal subsistence hunting and trapping seasons for wolves in Unit 1 into alignment with current State seasons which are currently longer. The proposal provides for consistent regulations with the State by creating a new Federal regulation specific to Unit 1A and a small portion of Unit 1B. The new regulation would extend the hunting season closing date in Units 1A and the portion of 1B south of the Bradfield Canal and the east fork of the Bradfield River to May 31. The remainder of the Unit 1 hunting regulations would not be changed. To align the Federal trapping season, the starting date of the season for Unit 1 is proposed to be moved from November 10 to November 1.

Existing Federal Regulation

Unit 1 – Wolf (hunting)

5 wolves

Aug. 1 – Apr. 30

Unit 1 – Wolf (trapping)

No limit.

Nov. 10 – Apr. 30

Proposed Federal Regulation

**Unit 1A, 1B south of Bradfield Canal and the east fork of the
Bradfield River – Wolf (hunting)**

5 wolves

Aug. 1-~~Apr. 30~~May 31

Unit 1B remainder, 1C, 1D – Wolf (hunting)

5 wolves

Aug. 1 – Apr. 30

Unit 1 – Wolf (trapping)

No limit.

Nov. 1-~~4~~Apr. 30

Existing State Regulation

Unit 1A, 1B south of Bradfield Canal and the east fork of the Bradfield River – Wolf (hunting)

5 wolves. Hides must be sealed within 30 days of kill

Aug. 1-May. 31

Unit 1 remainder, 1C, 1D – Wolf (hunting)

5 wolves. Hides must be sealed within 30 days of kill. Wolves taken on Douglas Island must be reported within 48 hours and sealed within 5 days.

Aug. 1 – Apr. 30

Unit 1 – Wolf (trapping)

No limit. Wolves must be sealed within 30 days after the close of the season. Unit 1C, Gustavus: all trappers must register with ADF&G prior to trapping wolves. Unit 1C, Douglas Island: all trappers must register with ADF&G prior to trapping wolves; a trapper who takes a wolf in the management area must report the harvest to ADF&G Division of Wildlife Conservation in Douglas within 48 hours of taking the wolf and present the hide for sealing within 5 days.

Nov. 1-Apr. 30

Extent of Federal Public Lands

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

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for hunting or trapping of wolves in Unit 1. Therefore, all Federally qualified subsistence users may harvest this species in this unit.

Regulatory History

From 1915 through the early 1970s, a cash bounty was paid for wolves in Southeast Alaska (ADF&G

1997). Biological and harvest information has been collected on harvested wolves since the early 1960s. Records from 1961–62 and from 1970–71 are from bounty payments. A mandatory sealing program under State regulation has been in effect since that time (ADF&G 1989).

The Board adopted existing State hunting and trapping regulations for Unit 3 in 1990. In 2010, the Board rejected proposals WP10-23 and WP10-24 which would have shortened both the Federal hunting and trapping seasons for wolves in this unit.

Following action during the November 2008 Alaska Board of Game (BOG) meeting, the State regulated trapping season for the entirety of Unit 1 was extended from November 10 to November 1. During its 2010 meeting, the BOG extended the hunting season end date from April 30 to May 31 in Unit 1A and a defined portion of Unit 1B. This regulation was developed to increase opportunity for spring bear hunters to harvest wolves (Porter 2012).

Biological Background

Wolves likely moved into Southeast Alaska following postglacial northward expansion and establishment of Sitka black-tailed deer populations (Lowell 2006). Wolves occur throughout the Southeast Alaska mainland and on all of the major islands except Admiralty, Baranof and Chichagof Islands in Unit 4. Wolves are well adapted to the island and mainland environment of Southeast Alaska, although densities on the mainland are generally lower than on maritime-influenced islands. Wolves are proficient swimmers and regularly travel between adjacent islands in search of prey (Porter 2006). Wolves live throughout the islands and mainland of Unit 1, although densities on the mainland are generally lower than on maritime-influenced islands (Porter 2012).

Deer are the primary food source of wolves in Southeast Alaska (Lowell 2006), with wolf predation studies estimating that one wolf takes an average of 26 deer per year where there are no other available food sources (Person et al. 1996). Other prey species include mountain goat, moose, small mammals, beaver, salmon and waterfowl (Szepanski et al. 1999).

Recent population indices

In Southeast Alaska, minimum home ranges for wolf packs on Revillagigedo Island (located in Unit 1A) averaged 279 km² (108 mi²) and ranged from 79-447 km² (30-170 mi²). Wolf pack sizes on Revillagigedo Island during this study averaged 5.4 wolves and packs varied in size from 2-12 wolves (Smith et al. 1987). No accurate population estimates are currently available for Unit 1A wolves. However, based on reported harvests, staff observations, and reports from trappers, the Unit 1A wolf population appears to be stable (Porter 2012).

Wolf densities in Unit 1B are believed to be higher than those in the interior regions of Alaska, but the dense forest cover makes viewing opportunities very difficult. Sealing records for Unit 1B provide insufficient data to make any meaningful estimates of the wolf population. Currently, population estimates are based on estimates of average territory and pack sizes from research on Prince of Wales Island (Person et al. 1996). Current estimates for the sub-unit are thought to be 8 packs reflecting in a

total population of 45-85 animals (Lowell 2012).

Wolves are distributed throughout Unit 1C, but anecdotal evidence suggests they primarily inhabit the major mainland river drainages such as the Taku River and Berners Bay. Exceptions include the Chilkat Mountains and Gustavus forelands where wolves appear to be uniformly distributed, most likely due to the presence of moose. The presence of wolves on Douglas Island has been in question since the wolf harvest that occurred during the 2001/2002 season. There is no formal data collection protocol to make any meaningful estimates of wolves in the subunit. Although no quantitative data are available, trappers have reported that wolves are common in Unit 1C and seem to be increasing. Anecdotal reports from local hunters, trappers and pilots suggest wolves continue to reside in all of the traditional areas which seems to be validated by harvest data (Scott 2012).

No population studies have been conducted for Unit 1D, so all population information is based on anecdotal information, sightings made during aerial moose and mountain goat surveys, discussions with hunters and trappers from the area and from interpretation of sealing data. Wolf numbers and distribution seem to be consistent with previous years (Sell 2012).

Harvest History

Wolves can be harvested either with a firearm under hunting regulations or by trap, snare or firearm under trapping regulations. Wolf harvest is affected by local weather conditions and wolf abundance. Persistent freezing results in icing of traps and snares often making sets inoperative, and deep snow can bury snares and trail sets rendering them useless. Deep and persistent snow can also block vehicle access roads in Unit 1. Harvests by subunit can be found in **Table 1**, and by method of harvest in **Table 2**.

Table 1. Unit 1 wolf harvest by subunit, 2004-2016 (Schumacher 2017, pers. comm.).

Unit	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
1A	26	28	49	37	42	24	15	26	26	31	6
1B	12	5	4	4	5	10	14	9	21	10	24
1C	14	10	6	11	21	5	15	18	14	13	21
1D	3		6	7	11	2	17	5	2	2	10
Totals	55	43	65	59	79	41	61	58	63	56	61

*2016 data is preliminary

Table 2. Unit 1 wolf harvest by harvest method, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Firearm	20	15	21	21	14	16	18	17	13	12	7
Snare	27	24	36	26	38	21	31	23	26	30	30
Trap	7	4	8	11	27	4	12	18	24	13	24
Other	1			1						1	
Totals	55	43	65	59	79	41	61	58	63	56	61

*2016 data is preliminary

Most wolves have been harvested by hunters and trappers working from boats with the majority of the trapping harvest typically occurring on State managed tidelands (below mean high tide line). Harvests by month can be found in **Table 3** and by method of transportation used in **Table 4**. Harvests in May have been very low, which is most likely related to pelt quality being degraded this late into the season. Of the eight wolves harvested by firearm in Unit 1 since 2010, only one was harvested by a Federally qualified subsistence user (Schumacher 2017, pers. comm).

Table 3. Unit 1 wolf harvest by month, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
July	1					1					
Aug		2		2	2		2	2			
Sept	8	10	7	2	4	4	3	1	5		1
Oct	4		2	1	1	1	3	4	2	3	1
Nov	1	1	4	4	1	6	4	4	1	5	1
Dec	7	2	5	10	14	3	6	5	5	9	13
Jan	5	2	9	11	24	10	11	18	12	9	11
Feb	14	9	12	7	8	5	15	6	19	15	14
Mar	11	10	17	13	13	8	15	14	15	4	12
Apr	4	7	9	9	11	2		4	2	9	8
May					1	1	2		2	2	
Totals	55	43	65	59	79	41	61	58	63	56	61

*2016 data is preliminary

Table 4. Transportation used to harvest Unit 1 wolf, 2006-2016 (Schumacher 2017).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Vehicle	4	3	4	5	3	3	2	8	3	4	7
Boat	45	34	52	40	62	33	43	40	49	44	47
4 wheeler	1	1	2	1	3	2		6	4	2	
Other ATV				1			1		2	1	1
Snowmobile		2	2	5	6		5			1	6
Foot	2		1	5	5	2	8	4	3	3	
Airplane	2	3	3				2		2		
Other								1			
Unknown	1		1			1				1	
Totals	55	43	65	59	79	41	61	58	63	56	61

*2016 data is preliminary

Effects of the Proposal

If adopted, this proposal would provide increased harvest opportunity under Federal regulations on Federal public lands in Unit 1. The proposal is unlikely to substantially increase the harvest of wolves taken in Unit 1 because Federally qualified subsistence users can already harvest on the same lands during the same time period and with the same total State and Federal combined trapping and hunting limits that are currently allowed under State regulations.

Federal regulations allow for the customary trade of products crafted from animals harvested during Federal seasons. Customary trade is not allowed under State regulation. Adoption of the proposal would allow for customary trade to occur from wolves harvested during the extended Federal hunting and trapping seasons. Despite increased opportunity for customary trade, this proposal would not be likely to substantially increase the harvest of wolves over present levels as pelt quality is reduced during these periods. However, if increased trade opportunity increases the value and interest of wolf harvest during the proposed season extensions, then slight increases in harvest could result from this proposal.

Harvest during May when wolves are denning (Person and Russell 2009) could result in mortality of breeders or helpers influential of pack persistence, denning and recruitment rates, and population growth, especially when pack sizes are less than six wolves (Brainerd et al. 2008; Borg et al. 2015). While this proposal would not be expected to result in substantially increased harvest in May, slight increases in harvest could occur if the value of increased trading opportunity increases harvest interest for Federally qualified users. A slight harvest increase during the denning period could result in further impacts if breeders or helpers are harvested from small packs. Though current pack sizes in Unit 1 are not known, pack sizes on Revillagigedo Island during the 1980s averaged 5.4 wolves and ranged in size from 2-12 wolves. Therefore, extension of the Federal season into May with a State season already encompassing May could affect wolf numbers.

OSM PRELIMINARY CONCLUSION

Support Proposal WP18-03

Justification

Adopting this proposal will bring Federal hunting and trapping seasons for Unit 1 into alignment with State regulations that are currently longer than Federal seasons. Federally qualified subsistence users can already harvest wolf during the longer State seasons. Adoption of this proposal would allow subsistence users to engage in customary trade if they desire from any wolves harvested from Federal lands within the expanded seasons. With pelt quality being of a less than prime during the proposed season extensions, it is unlikely that harvests would increase specifically for engaging in customary trade.

Wolf harvest in Unit 1 is currently believed to be occurring at a sustainable level based on anecdotal accounts and harvest rates. Harvests in both November and May are currently very low in comparison to other months. Alignment of Federal regulations with the State regulations should not dramatically increase harvests beyond current levels as the majority of the May harvest is not being taken rural residents.

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WRITTEN PUBLIC COMMENTS



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 7:51 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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From: **Francis Mauer** <fmauer@mosquitonet.com>
Date: Thu, Aug 3, 2017 at 9:02 PM
Subject: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz
To: subsistence@fws.gov

Comments Regarding Federal Subsistence Proposals: WP 18-03, 18-04, 1805, 18-24, and 18-51

Submitted to the Federal Subsistence Board by Fran Mauer, P.O. Box 80464, Fairbanks, AK 99708. August 3, 2017.

WP 18-03 I am opposed to extending the wolf hunting and trapping seasons in Unit 1. Wolves are highly vulnerable to harvest as it is, further extending of seasons is not justified, and would likely lead to excessive harvest of wolves as occurred on Prince of Wales Island last year which was supposed to be regulated by a quota, but even with quota rules in place the actual harvest exceeded the quota by 2.6 times. This proposal should be denied.

WP 18-04 This proposal would allow 30% of the wolf population on Prince of Wales Island to be harvested when existing harvest is 20%. As noted above, wolves are highly vulnerable to harvest, and last year's harvest exceeded the quota by 2.6 times! The extensive network of roads and trails on Prince of Wales render wolves exceptionally vulnerable. Expanding the harvest to 30% of the population following excessive harvest last year can not be justified given the failed management of this quota system last year. This proposal would lead to excessive harvest of an already depleted population and should be denied to conserve wolves on the Island.

WP 18-24 This proposal will open the door to harassment of wildlife by snow machines and violate a basic premise of hunting: respect for animals and fair chase principles. It would also result in excessive impacts to other animals that are not harvested due to disturbance associated with this "practice." Furthermore, it will exacerbate difficulty in enforcement of harassment rules. Approval of this proposal would give a black eye to subsistence in general, and certainly the Federal Subsistence Board, specifically for condoning such an inappropriate practice on the Federal public lands of Alaska. Deny this proposal.

WP 18-51 This proposal would lower Federal standards for baiting to the lowest common denominator: State requirements. By allowing the use of human food items such as syrup, old dough nuts and other human refuse will habituate bears to humans and contribute to human – bear conflicts, and expose innocent people to risks from bears that no longer fear humans. Every spring the Alaska Dept of Fish and Game sponsors public service announcements advising folks to keep their garbage and bird feeder refuse secure from bears, clearly stating the danger to humans from habituated bears. There is absolutely no justification to also allow the use of human foods and scent to bait bears. I urge the Board to reject this proposal (18-51).

Thank you for the opportunity to comment.

Fran Mauer

August 1, 2017

TO: Federal Subsistence Board 4 pages
Attention Theo Matuskowitz
FR: Alaskans FOR Wildlife, Jim Kowalsky, Chair
RE: Comments of proposals 18-03; 18-04; 18-05
4 pages

Alaskans for Wildlife is a statewide member Alaska organization promoting naturally occurring wildlife through education and advocacy and is headquartered in Fairbanks.

We wish to offer comments on proposals 18-03; 18-04; 18-05 and 18-14.

18-04 - to increase the wolf quota take from 20% to 30% of the estimated population in GMU 2.

We ask that this change be rejected. The population of wolves is very low and efforts to enforce past quotas have been very poorly managed. An article detailing a management failure for this population of wolves in the March 14, 2017 of the Ketchikan Daily News reveals 26 wolves were harvested VS. the quota of 11, exceeding 2.6 times the quota. The quota has also been exceeded prior years. In 2016 an ADFG decision to close was made on 12/16 through a press release announcing an Emergency Closure issued 3 days later, giving trappers another 14 days to retrieve traps and have hides sealed.

The final take is 28 plus illegal and unreported beyond that. Illegal past takes are reported to be as high as half of legal take. ADFG Regional Supervisor Ryan Scott is quoted in the article thus: "There's delay in reporting...it's part of the process...it's a difficult process." We note the ADFG responsibility of the management of this hunt is essentially out of control and an abject failure. This hunt should in fact be closed completely given the admitted inability to manage it and the need for this population to recover to a normal historic level.

18-03 To extend the wolf season in Units 1A and 1B. We note the inability to manage as a matter of record outlined in the above explanation as a principle violated that very likely extends to these units and should not be repeated here made worse by poor management. We urge this proposal to extend the season be denied.

18-05 No limit for trapping wolves GMU 1. This is excessive and also is subjected to noted generally failed management as a matter of record and should be denied.

18-24 Use of snowmachines to “position” wolverines, wolves and caribou is vigorously opposed. The proposal would allow, nay, encourage, chasing ...not “positioning” ...wildlife to exhaustion and amounts to nothing more than extreme gross harassment. That can not be identified as a tradition. To permit what’s proposed here will earn subsistence a deserved very poor reputation in very high negatives and quickly. It must not be enacted. It is a virtual kiss-of-death for subsistence proposal.

In closing we have a word of advice. Upon reading the 125 or so pages of the transcript of the March 2017 Southeast Regional Council meeting, it is especially disturbing that no recognition or even a hint of acknowledgement of the fact that these are public lands belonging to all Americans was anywhere to be found. As you deliberate these proposals, we, Alaskans FOR Wildlife, wish to emphasize that there is a very broad interest in Alaska’s federal public lands and its wildlife. Do not treat wildlife on these lands as a sole possession.

Not even a hint of the broader public interest and values is present in the regional council discussion including by state ADFG and federal agency personnel participating. We see none in the proposal justifications either. We have real fear that this insular attitude prevails throughout, and if we are correct, this is wrong and eventually will cause trouble for the subsistence populations involved, promise.

We urge all involved including agency managers and regional council leadership and members that you all please must consider the big picture if you are to survive and flourish in the public eye. Be assured that the proposed actions and implementation and failures are being carefully watched. Social media for one will capture your actions and make life very difficult over a short time. Please act with wisdom and a genuine recognition that, federal subsistence law notwithstanding, you are all obligated to share public lands and the riches that dwell there.

Thank you for considering our participation.

Jim Kowalsky
Chair
Alaskans FOR Wildlife
PO Box 81957
Fairbanks, AK 99708
907 488 2434



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 1:55 PM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul McKeen <paul_mckee@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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From: **Sharon Alden** <fwxsca@yahoo.com>
Date: Fri, Aug 4, 2017 at 1:52 PM
Subject: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24
To: "subsistence@fws.gov" <subsistence@fws.gov>

To: Office of Subsistence Management
Attention: Theo Matuskowitz
From: Sean McGuire
Re: comments on proposal WP 18-51, 18-03, 18-4, 18-5, 18-24

I am opposing proposal WP 18-51 There should be no human food or any human substance to bait any animals. This is so basic. The last thing we want is to habituate bears or any wild animal to human food. This is an ethical as well as a safety issue. The last thing we want to see is the federal baiting regulations aligned with the state of Alaska's. The State baiting regulations are painfully out dated and present a glaring safety issue.

I am opposing proposal WP 18-03 the extended hunting and trapping season in game unit one. Over kill.

I am really opposed to proposal WP 18-04. Why in the world would you want to put more pressure on a wolf population that's already in trouble this appears to be contrary to the basic concept of wildlife management?

I am also opposing proposal WP 18-05 relates to my opposition to WP18-04.

I am also opposing in the strongest possible terms proposal WP 18-24
To heard wildlife with snow machines is one of the most unethical things I can imagine and the backlash would be harsh.

Thank you for your attention
Sean McGuire
159 Kniffen Rd
Fairbanks, Ak.
ph 907-888-0124
email fwxsca@yahoo.com



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–04 Executive Summary	
General Description	Proposal WP18–04 requests increasing the wolf harvest quota on Federal lands in Unit 2 from up to 20% to up to 30% of the most recent population estimate for the unit. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p>Unit 2– Wolf (hunting)</p> <p><i>5 wolves. The total annual harvest of wolves Sept. 1– March 31 in Unit 2 should not exceed 30% of the most recent unit-wide, preseason population estimate. 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.</i></p> <p>Unit 2 – Wolf (trapping)</p> <p><i>No limit. The total annual harvest of wolves Nov. 15– March 31 in Unit 2 should not exceed 30% of the most recent unit-wide, preseason population estimate. 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.</i></p>
OSM Preliminary Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	

WP18-04 Executive Summary	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	

WP18–04 Executive Summary	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	6 Oppose

**DRAFT STAFF ANALYSIS
WP18-04**

ISSUES

Proposal WP18-04, submitted by Southeast Alaska Subsistence Regional Advisory Council (Council), requests increasing the wolf harvest quota on Federal lands in Unit 2 from up to 20% to up to 30% of the most recent population estimate for the unit.

DISCUSSION

The proponent seeks to increase the allowable take of wolves on Federal lands in Unit 2. The proponent is concerned that previous quotas implemented have been too conservative and that the reductions in those harvest quotas during the 2015-2016 and 2016-2017 hunting and trapping seasons were not reflective of the actual wolf population for Unit 2.

Existing Federal Regulation

Unit 2– Wolf (hunting)

5 wolves. 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. Sept. 1 – March 31

Unit 2 – Wolf (trapping)

No limit. 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. Nov. 15 – March 31

Proposed Federal Regulation

Unit 2– Wolf (hunting)

*5 wolves. **The total annual harvest of wolves in Unit 2 should not exceed 30% of the most recent unit-wide, preseason population estimate.** 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.* Sept. 1 – March 31

Unit 2 – Wolf (trapping)

*No limit. **The total annual harvest of wolves in Unit 2 should not exceed 30% of the most recent unit-wide, preseason population estimate.** 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.* Nov. 15 – March 31

Existing State Regulation**Unit 2 – Wolf (hunting)**

5 wolves. Hides must be sealed within 30 days of harvest. Dec. 1-Mar. 31

Unit 2 – Wolf (trapping)

No limit. Wolves taken in Unit 2 must be sealed on or before the 14th day after the day of taking. Dec. 1-Mar. 31

5 AAC 92.008(1) the annual harvest of wolves in Unit 2 should not exceed 20 percent of the unitwide, preseason population as estimated by the department.

Extent of Federal Public Lands

Federal public lands comprise approximately 72% of Unit 2 and consist of 72% U.S. Forest Service (USFS) managed lands (see **Unit 2 Map**).

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 this species in this unit.

Regulatory History

From 1915 through the early 1970s, a cash bounty was paid for wolves in Southeast Alaska (ADF&G 1997). Biological and harvest information has been collected on harvested wolves since the early 1960s. Harvest records from 1961–62 and from 1970–71 are derived from bounty payments. A mandatory sealing program under State regulation has been in effect since that time (ADF&G 1989). In 1996, the Alaska Board of Game adopted a harvest cap of 25 percent of the estimated fall Unit 2 wolf population which became effective during the 1997-1998 hunting and trapping season (Porter 2000). In fall 2000, in order to provide more hunting and trapping opportunity and to avoid future emergency order closures while improving harvest reporting, the Alaska Board of Game increased the harvest cap from 25 to 30 percent of the fall population estimate (Porter 2003).

In 1997, when the joint State/Federal harvest quota was implemented, the Board adopted Proposal WP97-08 requiring that all wolves taken in Unit 2 be sealed within 30 days of harvest. In November 2010, the Alaska Board of Game (BOG) adopted a regulation modifying the sealing time for wolves taken in Unit 2 under trapping regulations from 30 days to 14 days. As a result, the Board adopted Proposal WP12-19 which changed Federal sealing requirements for both hunting and trapping to align with the State's sealing requirement.

Over the years, several changes to wolf seasons have occurred. In 2001, the Board adopted WP01-05 requesting the Federal trapping and hunting season start dates be changed from Dec. 1 to Nov. 15 and shortening the seasons from Mar. 31 to Mar. 15. In 2003, the Board adopted WP03-10 with modification changing the Federal hunting season start date from Nov. 15 to Sept. 1, but not extending the season end date from Mar. 15 to Mar. 31. In 2007, the Board adopted WP07-15 with modification changing the Federal trapping season closing date from Mar. 15 to Mar. 31.

In March 2014, joint State and Federal in-season actions closed hunting and trapping for wolves in Unit 2 when the reported harvest approached the established quota for the 2013-2014 regulatory season. As a result of this harvest, as well as the pending petition to list the Alexander Archipelago wolf, the Alaska Department of Fish and Game (ADF&G) held public meetings in several Unit 2 communities before determining the 2014-2015 quota. As a result of these meetings, ADF&G and Unit 2 users agreed on a conservative management strategy to reduce the harvest quota from 30% to 20% of the fall population estimate. Following another consecutive mild winter, the reduced quota was reached by February 2015 and State and Federal managers closed their respective hunting and trapping seasons.

In January 2015, the Alaska Board of Game (BOG) adopted a regulation reducing the harvest guideline level for Unit 2 wolves from up to 30% to up to 20% of the unit-wide, pre-season population as estimated by ADF&G. At that time the population was low and the goal of this change was to increase the population while still allowing meaningful harvest opportunity. Although the same proposal requested wounded or unrecovered wolves count against a hunter's harvest limit for the regulatory year, the BOG chose not to support that provision. Voluntary reporting of wounding loss is encouraged, and if ADF&G determines that any wolf was mortally wounded by a human induced cause, they would count it against the harvest quota (Scott 2015, pers. comm.).

In addition to the reduced harvest guideline level, during regulatory years 2015 and 2016 state and federal managers reduced the maximum allowable harvest quota for Unit 2 wolves by 50% as an additional conservation measure to account for unreported human-caused mortality. Unreported mortality, including wounding loss, escapes from traps, vehicle collisions, and illegal killing, has been identified as a potentially substantial cause of mortality among Unit 2 wolves (Person 2008, Roffler et. al. 2016). The goal of this management strategy was to increase the wolf population so it could support a greater harvest. Currently there is no population goal for Unit 2 wolves. (Schumacher 2017, pers.comm).

Wildlife Special Action WSA15-13 requested pre-season closure of wolf harvest by Federally qualified subsistence users and non-Federally qualified users on Federal public lands in Unit 2. WSA15-13 was rejected by the Board, as ADF&G and USFS established a conservative harvest quota of 9 wolves for the

2015-2016 regulatory season after consultation with the four local Federally-recognized Alaska Native tribes, as well as several other users with local knowledge of Unit 2 wolf populations. The Board felt closure to subsistence and non-subsistence uses was not necessary in Unit 2 as the conservative harvest quota would result in a sustainable harvest and the Federal in-season manager has the delegated authority to close the harvest on Federal public land when the quota is reached.

The Alexander Archipelago wolf has been identified as a distinct subspecies of the gray wolf. In 1987, in preparation for the revision of the Tongass National Forest Land Management Plan (Forest Plan), the USFS convened an interagency task group to identify Management Indicator Species. The wolf was identified because it was wide ranging, uses a variety of habitats and monitoring predator/prey interactions was deemed important for analyzing the effects of timber management on Sitka blacktail deer (USDA Forest Service 1987). In 1993, a petition was received requesting that the Alexander Archipelago wolves of Southeast Alaska be listed as a threatened subspecies pursuant to the Endangered Species Act (ESA) of 1973 as amended. In 1997, the USFWS determined that a listing was not warranted at the time. USFWS's decision to not list the wolf was based on species-specific conservation strategies placed in the Forest Plan revision (USDA Forest Service 1997a). The Forest Plan revision identified three strategies to address wolf viability concerns: 1) long-term deer habitat capability, 2) habitat reserves, and 3) management of human-caused wolf mortality through the administration of road access and regulation of hunting and trapping (USDA Forest Service 1997b).

A Wolf Risk Assessment panel was convened in 1995 and 1997 to assess the three strategies. The panel found that the 1997 decision for the Forest Plan Revision would result in a high likelihood of sustaining viable wolf populations in Southeast Alaska (USDA 1997a). The 2008 Forest Plan increased the acreage of small Old-growth Reserves and changed management from "open road density" to "total road density" in the wolf standards and guidelines to account for foot access by trappers and hunters. The 2008 Forest Plan Amendment measures aimed to ensure adequate protection to sustain viable populations of wolves (USDA Forest Service 2008; Cole 2015).

In 2011, Greenpeace and the Center for Biological Diversity (CBD) submitted a joint petition to the USFWS to list the Alexander Archipelago wolf under the ESA. In 2014, the USFWS made a positive initial 90-day finding that listing the species as threatened or endangered "may be warranted," and a formal status review would be prepared. Following a lawsuit filed against the USFWS by Greenpeace and CBD that claimed the timing of the 12-month status review would be exceeded, the USFWS settled on a decision date of December 2015 for this finding. In January 2016, the USFWS published its finding that listing was not warranted.

In March 2016, an inter-agency technical committee with representatives from the USFS, USFWS and ADF&G was formed to identify wolf habitat management issues in Unit 2. The goal of the committee was to create a Wolf Habitat Management Program for Unit 2, owing to mandatory Forest Plan standards and identified wolf population concerns in Unit 2. The committee produced a document providing science-based recommendations for wolf habitat management in Unit 2, including aspects of deer habitat management, road management, wolf management and mortality, den management, and human dimensions to secure a sustainable wolf population in Unit 2 that is resilient to variation in prey

abundance, harvest, and land management practices. Recommendations from the document are intended to be useful in developing project measures and alternatives using public input through National Environmental Policy Act processes as well as in developing future State and Federal regulations (Wolf Technical Committee 2017).

Biological Background

Wolves likely moved into Southeast Alaska following the postglacial northward expansion and establishment of Sitka black-tailed deer populations (Person et al. 1996). Wolves occur throughout the Southeast Alaska mainland and on all of the major islands except Admiralty, Baranof and Chichagof Islands in Unit 4. Wolves are well adapted to the island and mainland environment of Southeast Alaska, although densities on the mainland are generally lower than on maritime-influence islands. Wolves are proficient swimmers and regularly travel between adjacent nearby islands in search of prey (Porter 2006). Deer are the primary food source of wolves in Southeast Alaska (Lowell 2006), with wolf predation studies estimating that one wolf would take an average of 26 deer per year in an environment with no other food sources (Person et al. 1996). Other prey species include mountain goat, moose, small mammals, beaver, salmon and waterfowl (Szepanski et al. 1999).

Wolves are highly social animals and usually live in packs that include parents and pups of the year, some yearlings and often other adults. Pack sizes usually range from 6-12 animals, although packs of up to 30 individuals have occurred. Packs tend to remain within a home range used almost exclusively by fellow pack members with occasional overlap in the ranges of neighboring packs (Stephenson 1984).

Wolves generally breed in February and March with a female's first breeding occurring at age two to four (Mech et al. 1998). Litters averaging about four pups are born in dens during the last week of April through the second week of May (Person and Russell 2009). Adult wolves center their activities near dens while traveling as much as 20 miles away in search of food, which is brought back to the den. Wolf pups are weaned gradually during the summer. Wolves abandon the den after about eight weeks and live at sites above ground until early autumn when the entire pack roams a large territory for the rest of the fall and winter. By early winter the pups are capable of traveling and hunting with the adult pack members (Stephenson 1984).

Wolves live at low densities in structured populations of territorial packs (Mech and Boitani 2003). Meier et al. (2006) reported that 28% of wolves will leave their packs each year, and that most offspring eventually leave the pack. Dispersing wolves form new packs when they locate dispersers of the opposite sex from another pack and a vacant area to establish a territory (Rothman and Mech 1979). Porter (2006) reported that one radio collared wolf from Kupreanof Island was observed moving more than 120 miles overland and making several saltwater crossings. Person et al (1996) documented two different Unit 2 wolves travelling over 100 miles from Kosciusko Island where they were collared to southern Dall Island and southern Prince of Wales Island.

Wolf pack territories can overlap one another and change over time (Meier et al. 2006). As a pack makes its way around its territory, it may encounter and engage with other wolves at any time. A fight to the death can occur during such encounters. With high reproductive capacity, good survival of young, and

high dispersal rates, wolf populations are able to quickly respond to changes in prey abundance.

Home range estimates for wolves on Prince of Wales Island and adjacent islands in Unit 2 were derived from radio-telemetry data. Home ranges for packs averaged 97.3 mi² across all seasons and 39.2 mi² during the pup-rearing season (Person 2001). Home range size generally increases somewhat as prey abundance decreases, and vice versa. Wolves that disperse from their natal home range generally do so at between 1 and 3 years of age. Minimum dispersal distances in Unit 2 range between 4.4 and 156.4 miles and dispersal may involve crossing areas of saltwater (Person 2001). In wolf populations where mortality is high, lone wolves may be more successful in finding vacant territories in which to settle or in being accepted into an established pack (Ballard et al. 1987).

Habitat

In parts of Unit 2, where road access is extensive, it is conceivable that a large increase in hunting and trapping could affect wolf numbers. Although not all of Unit 2 has road access, there may be some areas in Unit 2 where wolves experience heavier hunting and trapping pressure and as well as less deer for prey because of roads and prior logging in Unit 2 (ADF&G 1989). While an expanding road system and increasing human population have the most direct impact on wolves through increased hunting and trapping, the logging of old growth forest also reduces the carrying capacity of the area for deer, particularly during more severe winters.

The maintenance of large roadless and unfragmented areas, to function as old-growth reserves, and distribution of old-growth forest to maintain connectivity between them was one of the approaches, now known as the Tongass Conservation Strategy, undertaken early on during the Forest Plan revision to ensure long-term viability of wolves and other old-growth associated species in Southeast Alaska. Person et al. (1996) suggested that this maintenance of large, unfragmented and unroaded blocks of habitat within biogeographic areas where extensive timber harvest was planned would help mitigate the loss of deer habitat and the associated expected reductions in numbers of wolves. The reserves should be large enough to encompass core activity areas of at least one wolf pack (ADF&G 1997). These reserve components of the Tongass Conservation Strategy were rated highly by the Wolf Risk Assessment Panel (Iverson, 1997). The Tongass Conservation Strategy and the Wolf Risk Assessment Panel were reviewed for the 2008 Forest Plan Amendment (USDA Forest Service 2008, Cole 2015).

The influence of road access largely influences the human-caused mortality of wolves. Although Person (2001) believes the density of roads has the most influence on wolf harvest in Unit 2, the current total road density in Unit 2 is at 0.9 mi/mi² which is within the road density range identified for wolf (0.7 to 1.0 mi/mi²) in the standards and guidelines for wolves in the Forest Plan (USDA Forest Service 2016). The road density is currently at 0.4 mi/mi² for Unit 2 and there have been measures taken to identify and reduce the current amount of open roads (closures identified through the Access & Travel Management process as well as the Big Thorne Environmental Impact Statement) (Bethune 2012).

Population indices

In the late 1960s to early 1970s there was believed to be more than one wolf for every 10 mi² (26 km²) in Unit 2 based on sealing data and limited flight survey data (ADF&G 1989). Wolf populations on Prince

of Wales Island were thought to have remained high until the early 1970s when extreme winters decimated deer populations. During the years of low deer numbers, density estimates for Revillagigedo Island (east of Prince of Wales Island across Clarence Strait) showed a wolf density between 1 every 22 mi² (57 km²) to 1 every 44 mi² (114 km²) based on research conducted in the mid-1980s (ADF&G 1989). Wolf densities in Unit 2 were believed to be similar (ADF&G 1989). Wolf and deer numbers were thought to have remained at low levels in Unit 2 until the early 1980s when the deer population rebounded (ADF&G 1989).

Wolf populations are difficult to assess in Southeast Alaska due to the dense forest cover and because of their mobility. However, radio-telemetry studies have allowed for estimates to be made for a small road accessible portion of their range and extrapolated across the rest of Unit 2, with appropriate corrections made for differences in prey populations and habitat. For over two decades, ADF&G and the USFS have cooperated on wolf research in Unit 2. This research has enabled the collection of data concerning wolf distribution, movement and abundance within Unit 2 (ADF&G 2014).

As a result of the initial research during the 1990s, Person et al (1996) estimated the 1994 fall wolf population density representative of his study area (6,808 km² in one the most extensively roaded and logged areas of Unit 2) at 39 wolves/1000 km² reflecting a population estimate of 356 wolves with a 95% Confidence Interval (CI) of 148-564 wolves (USFWS 2015). This estimate, along with other findings related to natural mortality, led to the BOG establishing a harvest rate of up to 25% of the fall population estimate in 1997. When new findings suggested the natural mortality in Unit 2 was lower than initially thought, the BOG adopted an increased harvest rate of 30% in 2000 (ADF&G 2014).

During the early to mid-2000s, ADF&G made an effort to obtain an updated wolf population estimate and determined that the wolf population was approximately 326 animals which was similar to the estimate from 1994. State and Federal staff continued to use this population estimate to establish annual harvest levels of 90 wolves per season through 2010 (ADF&G 2014).

In 2010, both State and Federal managers, as well as some members of the public, believed the Unit 2 population had dropped from previous estimates. In response, ADF&G worked with the Southeast Alaska Subsistence Regional Advisory Council to lower the annual harvest quota from 90 to 60 wolves. This harvest quota remained in effect through the 2013 season (ADF&G 2014).

From 2012 to present, research was initiated to develop a more efficient and cost effective technique to estimate wolf numbers. The new research methods (hereon referred to as hair-board methods) included implementing hair-snare traps to collect wolf hair samples for DNA fingerprinting. The DNA collection has enabled the researchers to identify individual wolves via genotyping and allowed wolf population estimation in the project area using a state of the art mark-recapture technique (ADF&G 2014; Roffler et al. 2016). This hair-board method was done simultaneously with a traditional assessment using radio collared wolves for comparison (Roffler et al. 2016). The hair-board method and the concurrent traditional assessment data were additionally reported using the same area of projection and the same area plus the same methods of estimation, respectively, as used with the Person et al. (1996) estimate for comparison (Roffler et al. 2016)

Data collected during 2012 proved insufficient to allow development of a population estimate from the hair-board technique because there were not enough “recaptures,” though a 2012 estimate was feasible and reported using the traditional radio collar methods (Roffler et al. 2016). Based on the same methods and smaller projection area used by Person et al. (1996), the population estimate for 2012 was 106 wolves.

Data collected in 2013 were sufficient enough for a population estimate to be generated for the defined study area within the central portion of Prince of Wales Island. Based on the hair-board methods for the Unit 2 project area, when compared to those estimated in 1994, the estimate declined by about 15 wolves per 1000 km² from 39.5 wolves/1000 km² to 24.5 ±6.8 wolves/1000 km² (ADF&G 2014; Roffler et al. 2016). This decline reflects a Unit 2 population estimate decline from 356 wolves (95% CI = 148-564) in 1994 to 221 wolves (95% CI = 130-378) in 2013.

Using the hair-board method again in 2014, the Unit 2 density estimate declined to 9.9±3.0 wolves/1000 km² reflecting a population estimate of 89 wolves (95% CI = 50-159) which suggests a 75% (standard error of 15%) decline in the population since 1994. The 2014 estimate was also calculated using the same area of extrapolation used by Person et al. (1996) for comparative value, resulting in an estimate of 67 wolves (95% CI= 38-120) for the smaller 1996 study area in 2014 (Roffler et al. 2016)

There are various potential reasons for the lower wolf estimate of 89 for the study area in 2014, including an increased take of wolves from the study area prior to the 2014 population estimate, decreases in deer abundance, availability of non-ungulate prey, increases in disease in wolves, increases in unreported wolf take and the possibility of a decrease in the vulnerability of deer to wolf predation during mild winters (ADF&G 2015) causing subsequent decreases in recruitment and survival of wolves. Though a number of these may contribute, the most likely cause is harvest rates combined with high rates of documented unreported human caused mortality (47% Person and Russell 2008; 38% Roffler et al. 2016; USFWS 2015) leading to unsustainable mortality in this population.

The decline in the population density estimate within the study area was anticipated based on harvest reports and observations by staff and the public. Based on these observations, at least one wolf pack, previously known to be in the study area, is believed to no longer be present. This assertion was corroborated by harvest records documenting 6 wolves taken from wildlife analysis areas within this pack’s home range during the 2013-2014 regulatory year and one radio-collared wolf taken during autumn 2014. ADF&G believes that as long as harvest remains low and other factors like prey availability and habitat suitability remain unchanged, wolves will recolonize the vacant pack territory within the study area and future density estimates will be higher (ADF&G 2015).

Roffler’s (2016) most current wolf density estimate of 12 wolves/1000km² is lower than other wolf densities in other parts of North America where deer are the primary prey species (range=28-70 wolves/1000km² as summarized in Person et al. 1996). Recent population declines identified for wolves in Unit 2 as well as concerns about future viability of this population (USFWS 2015) suggest conservative management as prudent. Several Unit 2 residents have expressed satisfaction with current wolf levels, with correspondingly higher deer encounters and deer harvest opportunities than were

experienced when wolf numbers were higher (ADF&G 2014).

Harvest History

Unlike the remainder of Alaska, Unit 2 wolf harvest is managed under a harvest quota by regulation. A Harvest Guideline Level (HGL) for Unit 2 wolves was set initially by the BOG in 1997 at 25% of the most recent population estimate. In 2000, it was raised to 30% following an analysis indicating lower levels of natural mortality in Unit 2 wolves than in wolf populations elsewhere. The proposal to reduce the HGL from 30% to 20% during the January 2015 BOG meeting came from ADF&G. After an apparent population decline, as well as ADF&G identifying that unreported take was a substantial factor in a study area within the road accessible portion of Unit 2, a HGL of 20% was proposed to the BOG to ensure conservative harvest management of wolves while still allowing for meaningful harvest opportunity (Schumacher 2017, pers. comm.).

Wolves can be harvested either with a firearm under hunting regulations or by trap, snare or firearm under trapping regulations (**Table 1**) with 93% of the harvest (2004-2013) taken by Federally qualified users (Scott 2015, pers. comm.). Wolf harvest is affected by local weather conditions and wolf abundance. Persistent freezing results in icing of traps and snares which can make them inoperative, and deep snow can bury snares and trail sets rendering them useless. Deep and persistent snow can also block vehicle access to many of the logging roads. Typically, the reported wolf harvest in Unit 2 has been highest from December through February (Bethune 2012).

Table 1. Unit 2 wolf harvest by method, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Firearm	14	18	7	3	4	6	11	11	3	3	8
Snare	5	12	7	7	4	1	13	11	4	4	12
Trap	19	6	10	13	12	21	28	35	22		9
Other											1
Totals	38	36	24	23	20	28	52	57	30	7	30

*2016 data is preliminary

Since 1985, most wolves (59%) have been harvested by hunters and trappers working from boats (Person and Russell 2008; Person & Logan 2012) with harvest typically occurring on State managed tidelands (below mean high tide line). Harvests by month (ranging from 0-27 wolves depending on the year and month) can be found in **Table 2** and by method of transportation used in **Table 3**.

Table 2. Unit 2 wolf harvest by month, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Sept	2					1					1
Oct		4		1					1	1	
Nov	1	4					3			2	6
Dec	2	7	2	5	2	8	8	6	1	4	23
Jan	4	13	2	7	10	4	12	27	8		
Feb	16	7	9	5	2	7	16	18	19		
Mar	13	1	11	4	6	8	13	6			
Apr				1		1					
Unknown									1		
Totals	38	36	24	23	20	28	52	57	30	7	30

*2016 data is preliminary

Table 3. Transportation used to harvest Unit 2 wolf, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Vehicle	14	16	18	5	6	9	29	28	6	5	10
Boat	14	19	6	6	5	17	23	29	22	2	18
4 wheeler	6	1		4	7				1		
Other ATV				8	1						
Snowmobile	2										
Foot						1					2
Airplane					1						
Other	2					1			1		
Totals	38	36	24	23	20	28	52	57	30	7	30

*2016 data is preliminary

Person & Russell (2008) identified illegal harvest of collared wolves, with the data suggesting an average of less than 2 study wolves per year were taken illegally during the study period (1993-1995 and 1999-2004) of an average of less than 4 study wolves that were killed by humans per year during that period. As a result, 47% of study wolf mortality due to human causes was categorized as illegal harvest. Roffler et al. (2016) determined that 38 percent of the wolves that died from human causes were unreported.

Effects of the Proposal

If adopted, this proposal would increase the harvest quota on Federal public lands in Unit 2 which would increase harvest opportunity for Federally qualified subsistence users. The proposal does not increase the number of wolves available to be taken from non-Federal lands under State regulations. The proposal would create divergence between State and Federal regulations, and would pose extreme difficulty for State and Federal managers that would be required to manage for two separate quotas in the unit. Based on the past population decline resulting from a similar harvest quota, the proposed harvest quota would likely lead to unsustainable harvests.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP18-04.

Justification

Since the proposal only increases available harvest on Federal lands, management of separate harvest quotas between State, private and Federal lands will be difficult for State and Federal managers as well as confusing for hunters and trappers.

Although recent action by the BOG reduced the quota to 20%, lower wolf population estimates prior to the past couple of seasons have resulted in further reductions to the quota to allow for sustainable harvest opportunity of wolves in the unit while rebuilding the population. Increasing the harvest quota back to 30% is likely to create conservation concerns for wolves. As such, adopting the proposal could violate established principles of wildlife management being contrary to the conservation mandates of Title VIII of ANILCA.

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WRITTEN PUBLIC COMMENTS



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: Comments on Proposal WP 18-04

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 7:52 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

----- Forwarded message -----
From: **Larry Edwards** <Larry@litedwards.com>
Date: Thu, Aug 3, 2017 at 8:54 PM
Subject: Comments on Proposal WP 18-04
To: subsistence@fws.gov

Dear Mr. Matuskowitz & FSB members

Please consider my attached comments on Proposal WP 18-04 ("Wolves Increase annual harvest quota").

Thank you,
-- Larry

Larry Edwards
Sitka, Alaska
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Larry Edwards

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August 3, 2017

(Attn: Theo Matuskowitz)
Federal Subsistence Board
Office of Subsistence Management
Anchorage, Alaska
via e-mail: subsistence@fws.gov

Subj: Comments on Proposal WP 18-04 (re: changing the cap on wolf take in GMU2)

Dear Mr. Matuskowitz and FSB members;

These are timely comments on Proposal WP 18-04, which is proposed by the Southeast RAC and is now before the Federal Subsistence Board for consideration. The proposal, which was issued by the Southeast RAC at its March meeting, would raise the allowable annual harvest of wolves in Unit 2 to 30% of the most recent unitwide, preseason population estimate. This cap is presently 20%.

I urge the Board to deny the proposal, for the following reasons: (1) since at least 2010 management of the wolf hunting/trapping seasons in GMU2 has proven to be highly problematic for conservation of the population, and a solution has not yet been found to the problems involved; (2) despite the very low population of GMU2 wolves in recent years (with small recovery indicated in the fall 2015 estimate), deliberate conduct by trappers in the 2016/2017 season caused the reported take to exceed the season quota by a factor of 2.5; (3) there is an identified conservation concern for GMU2 wolves, notwithstanding the Southeast RAC's statement in its WP 18-04 that it "anticipates no conservation concern";¹ and (4) the motive for the RAC's Proposal is largely that resident subsistence deer hunters on Prince of Wales Island desire greater success; however, the RAC focused only on predation by wolves in disregard of several other important factors of hunting success.

Details for these reasons follow, numbered as above.

1. GMU2 wolf management is highly problematic and as yet unresolved.

Two very substantial problems confront management of the wolf hunting/trapping seasons in GMU2. Under both the present and proposed regulations, the management cap is based on "the preseason population estimate." However, for technical reasons this population estimate is for the number of wolves that existed one year prior. During that one-year delay the most recent hunting/trapping season and one winter occur. Lacking an estimate that is fresh, a management decision adverse to conservation of the population is quite possible. Especially with a low wolf population as at present (and additionally with the potential for a sex-ratio imbalance with a low number of females as occurred in the estimate for fall 2014), the management instrument is blunt and dangerous.

Secondly, according to first-person testimony by Mike Douville² at the Southeast RAC's March 2017 meeting, several GMU2 trappers intentionally "gamed the system" during the 2016/2017 season, for the purpose of exceeding the quota of 11 wolves before an emergency closure could be issued. [SE RAC meeting transcript at 190-197]. To accomplish this:

¹ See the RAC's statement in the last sentence of its WP 18-04.

² Testimony, as a private citizen from the witness table, by Southeast RAC member Mike Douville.

“we weren’t turning in any wolves until the 14 days were up, so they had no idea of what we were doing. And we purposely did that ... to get the quota,³ which was what we wanted to do.” [Id. at 193].

By “quota” he meant the 20% in the regulation (which is, “the annual harvest of wolves in Unit 2 should not exceed 20 percent of the unitwide, preseason population”) without any deduction for unreported wolf take. For the estimated population of 108 wolves the 20% *regulatory cap*⁴ resulted in a *gross quota* (from human-caused losses of all kinds) of 22 wolves. An *reported-harvest quota* was then set at 11 wolves, by deducting a 50% buffer for unreported take (e.g. wounding loss, vehicle strikes on roads, and illegal take). This amounted to being an *reported-harvest cap* of 10%. The trappers “gamed the system” to try to double that, aiming for a reported harvest of 20%.

The result of the trappers’ subterfuge was a total reported take (scaled skins) of 28 wolves, or 26% of the (year old) population estimate (28/108). This greatly exceeds the 20% *regulatory cap*, and nearly exceeds ADF&G’s assumed safe level of take from all human-caused mortality, which is 28% (i.e. the *overall cap*). ADF&G’s 2015 Board of Game Proposal 14 said this to justify changing “the harvest guideline level” (or *regulatory cap*) from 30% to 20%.

In studies of numerous wolf populations, human-caused mortality of approximately 28% has been shown to be sustainable. On Prince of Wales, it has been suggested that unreported harvest may be substantial.

The result of trappers “gaming the system” is that just the reported harvest alone accounted for nearly all of the entire assumed-safe 28% *overall cap*. This left grossly insufficient margin for unreported take. A 2017 interagency report on GMU2 wolves notes that Person & Russell (2008) estimated unreported human-caused mortality at 50% of the total human take in GMU2, and that “more recent data suggest that 40%-50% of GMU 2 wolf mortality still results from unreported human causes.” [Wolf Habitat Management Program: GMU 2 Recommendations, March 2017, at 23]. ADF&G has found similar rates of unreported take of deer and black bear in GMU2,^{5,6} which supports that conclusion.

Further, Douville’s testimony included threats for continuing subterfuge by himself and other GMU2 trappers:

... unless some of this gets corrected, it’s going to get worse down the road
... so we need to correct the 20 percent part. [SE RAC transcript at 193].

³ The actual quota (a number of animals) was for a harvest of 11 wolves.

⁴ Terms of art in *italics* are provided to distinguish the various quantities involved. The existing regulatory terminology lacks necessary distinction and has led to regulatory mistakes in the past.

⁵ ADF&G has found a similar rate of illegal take for Prince of Wales black bears: “Other factors that managers must consider are wounding loss and illegal kills. Fifty percent additional mortality in 2005 (which the department suspects may be reasonable on POW based on radio collared bears) ...” [Chapter 5: Black Bear Management Report from: 1 July 2010 to 30 June 2013, for Prince of Wales and adjacent islands, at 5-9. <http://www.adfg.alaska.gov/index.cfm?adfg=wildliferesearch.smr20145>]

⁶ ADF&G has found a similar rate of illegal take for GMU2 deer: “We believe 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). 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.” (ADP&G 2015. “ADP&G_2015_Deer Management Report of Survey-Inventory Activities, 1 July 2012-30 June 2014”, at 4-5. http://www.adfg.alaska.gov/static/research/wildlife/speciesmanagementreports/pdfs/deer_smr_2015_full_report.pdf].”

... you will have a certain amount of civil disobedience and they will take matters into their own hands. And, you know, I don't care what kind of regulations you can make. We'll make our own, you know, that sort of thing. [Id. at 194].

Conclusions: The management situation demands a conservative regulatory limit because of the one-year delay in producing a wolf population estimate, because of 14-day reporting deadline which allows “gaming the system”, and because subterfuge and threats are dangerous to wolf conservation and otherwise should not be rewarded. WP 18-04 is not a solution to these problems, and would encode management that would be contrary to conservation of the GMU2 wolf population.

2. The GMU2 wolf population remains low, and the harvest quota was exceeded by a factor of 2.5 in the 2016/2017 season

Details for reason no. 2 have largely been covered above already.

3. A conservation concern has been identified for GMU2 wolves, notwithstanding that the Southeast RAC “anticipates no conservation concern

The concluding statement in the US Fish & Wildlife Service’s 2015 Status Review for the Alexander Archipelago wolf is, “[T]he persistence of the GMU 2 population is desired and requires careful management actions and decisions to ensure its future health.”

The Service also pointed out in its 2016 comments on the Tongass Land Management Plan Amendment DEIS that, “Implementation of existing standards and guidelines intended to protect wolves from unsustainable harvest and habitat loss appears to be inadequate for the wolves on Prince of Wales, given the population’s documented decline.” Cited were problems in the wolf standards and guidelines regarding road density and deer habitat capability in GMU2 and the lack of a wolf habitat management program. No changes to the standards and guidelines were made in the TLMP Amendment, adopted later in 2016. Although a wolf habitat management for GMU2 has since been convened, its considerations and recommendations are thus far incomplete.

The identified need for “careful management and decisions” for the GMU2 wolf population and the above continuing problems with habitat management place all the more importance on the need for conservative management of wolf hunting and trapping in the unit, especially in view of present low population.

4. The proposal is motivated by desire for higher deer hunter success; however, wolf predation became the RAC’s focus, while ignoring other factors of importance

An important consideration is why the trappers pushed the reported take of wolves into a factor-of-2.5 exceedance of the season’s quota. From Mr. Douville’s testimony to the RAC this March, it is apparent that the trappers’ action and this Proposal are directly about deer and only indirectly about wolves. He worries that while POW residents depend on deer [SE RAC 3/15/17 transcript at 193], the deer harvest and number of off-road hunters are increasing [Id. at 191] and that deer numbers are going down [Id. at 195]. He suggests a need to limit hunters from off-island to provide more deer for island residents. [Id. at 192]. While he is concerned about establishing a different balance between deer and wolf numbers [Id. at 191, 193, 194 & 197], it seems that he and other trappers have overlooked other factors as either a cause of insufficient subsistence hunter success or the subject of a solution.

The following relevant quotes concern those other factors, and are from the latest ADF&G deer management report for GMU2 (issued in 2015 for July 2012 through June 2014):⁷

Despite abundant deer, historically high harvests, and liberal seasons and bag limits, hunters from rural communities continue to complain about their inability to meet their subsistence needs. In some cases data from hunter reports substantiate those concerns. Among rural residents there is a perception of increased hunting pressure. The number of hunters for this reporting period (2,468 and 2,459 in RY12 and RY13, respectively), are the highest in the last 10 years (RY02–RY11), and 22% higher than the 10-year average (Table 1). ... Road closures may direct the same number of hunters into smaller areas, affirming the perception of increasingly crowded hunting conditions. ... In addition, as clear-cuts regenerate, deer become less visible, fueling speculation that fewer deer are available for harvest. [Id. at 4-4].

As black bear hunting opportunities diminish on POW many lodges, outfitters and guides may be shifting focus to deer hunting. Over the past 5 years the ADF&G office in Craig has noted an increase in nonresident inquiries about deer hunting in Unit 2, particularly from hunters interested in taking a Sitka black-tailed deer as part of their North American “deer slam.” [Id. at 4-3, 4].

[A]necdotal evidence and testimony from local residents suggests that the doe harvest by federal subsistence hunters is likely substantially under-reported. [Id. at 4-4]. For both sexes, “[w]e believe that Unit 2 has one of the highest illegal and unreported harvest rates in the region, estimated to be equal to the legal harvest. [Id. at 4-5]. 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. [Id.].

Conclusions & Recommendations. According to estimates based on harvest ticket reports, the Unit 2 harvest objective of 2,700 deer per year was exceeded during both years of this reporting period. In fact, anecdotal accounts from hunters and public testimony during a multi-agency Unit 2 deer planning effort in 2005 (Unit 2 Deer Planning Subcommittee 2005) suggested that we probably continue to significantly underestimate the total number of deer harvested because illegal and unreported harvest appear to be substantial. If that is the case, actual harvest may be more than double the harvest objective. [Id. at 4-6].

In addition, the loss of deer to black bear predation is likely much greater than the loss to wolves, especially for the last several years when wolf numbers have been quite low. In a recent study involving radio-collared deer:

The largest source of mortality ... was from hunting, followed by malnutrition ... and black bear predation Wolf mortality was not recorded for adult deer monitored during this study, despite wolf predation acting as a major source of mortality for deer monitored in the same study area 10 years previously (Person et al. 2009). [Gilbert, S. 2015, PhD. dissertation at pdf-74].

⁷ http://www.adfg.alaska.gov/static-research/wildlife/speciesmanagementreports/pdfs/deer_smr_2015_3_chapter_4_unit_2.pdf

Summer fawn survival was the lowest survival rate, with more than half of all fawns dying before three months of age on average (Table 3.1), primarily from bear predation. [Id. at pdf-78].

I focus on Sitka black-tailed deer (*Odocoileus hemionus sitkensis*) in Southeast Alaska, where adult female deer face predation by both wolves (*Canis lupus*) and black bears (*Ursus americanus*), whereas fawns face predation primarily by black bears. Wolves are relatively rare and highly cursorial, whereas black bears are more common and are mostly ambush predators. Prey animals can be more sensitive to predation risk from ambush rather than cursorial predators (Preisser et al. 2007; Schmitz 2008); Nevertheless, the abundance (Alaska Department of Fish and Game 2011) and omnivorous diet of bears likely make them difficult to avoid, particularly before the arrival of salmon in late summer (Campbell et al. 2012). [Id. at pdf-101].

In summary, the number of hunters is high and increasing, with many coming from off-island. Road closures are concentrating hunters, increasing competition. At the same time, in many places, regenerating clearcuts now make deer less visible, making it seem there are fewer deer than previously. Wounding loss and poaching of deer are high in GMU2, and humans are the greatest cause of deer mortality. Additional deer mortality from bears exceeds mortality from wolves. These other factors need to be considered with respect to subsistence needs, instead of jumping to a liberalization the existing wolf harvest regulation.

Conclusion

WP 18-04 should be denied. The GMU2 wolf population remains at a low number, and management of the hunting/trapping season is greatly frustrated by the one-year technical delay in estimating the population and the 14-day allowance for reporting take. The 14-day allowance allows trappers to greatly exceed an established season quota, by a multiple margin. The trappers have threatened, through their representative, to continue to their subterfuge of the regulation if it is not changed, and such threats should not be rewarded.

A conservation concern for the GMU2 wolf population has been identified by government agencies. Unreported takes of wolves, deer and bear are all very high in GMU2, unreported take of wolves must be fully account for, and with ADF&G's assumed safe level of total human take (28% of the population) must be effectively maintained. There is no need to liberalize the wolf regulation, because the main motive for doing so is to provide more deer for subsistence hunters. Other more important factors concerning competition between resident and off-island deer hunters and non-wolf causes of deer mortality need to be considered first. See also Brinkman et al. 2007.⁶

Please vote No on WP 18-04

Sincerely,



Larry Edwards

⁶ Brinkman et al. (2007), "Influence of hunter adaptability on resilience of subsistence hunting systems", specific to Prince of Wales Island.

<http://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1039&context=iea>



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Fwd: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 1:55 PM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul McKeen <paul_mckee@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Sharon Alden** <fwxsc@yahoo.com>
Date: Fri, Aug 4, 2017 at 1:52 PM
Subject: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24
To: "subsistence@fws.gov" <subsistence@fws.gov>

To: Office of Subsistence Management
Attention: Theo Matuskowitz
From: Sean McGuire
Re: comments on proposal WP 18-51, 18-03, 18-4, 18-5, 18-24

I am opposing proposal WP 18-51 There should be no human food or any human substance to bait any animals. This is so basic. The last thing we want is to habituate bears or any wild animal to human food. This is an ethical as well as a safety issue. The last thing we want to see is the federal baiting regulations aligned with the state of Alaska's. The State baiting regulations are painfully out dated and present a glaring safety issue.

I am opposing proposal WP 18-03 the extended hunting and trapping season in game unit one. Over kill.

I am really opposed to proposal WP 18-04. Why in the world would you want to put more pressure on a wolf population that's already in trouble this appears to be contrary to the basic concept of wildlife management?

I am also opposing proposal WP 18-05 relates to my opposition to WP18-04.

I am also opposing in the strongest possible terms proposal WP 18-24
To heard wildlife with snow machines is one of the most unethical things I can imagine and the backlash would be harsh.

Thank you for your attention
Sean McGuire
159 Kniffen Rd
Fairbanks, Ak.
ph 907-888-0124
email fwxsc@yahoo.com

August 1, 2017

TO: Federal Subsistence Board 4 pages
Attention Theo Matuskowitz
FR: Alaskans FOR Wildlife, Jim Kowalsky, Chair
RE: Comments of proposals 18-03; 18-04; 18-05
4 pages

Alaskans for Wildlife is a statewide member Alaska organization promoting naturally occurring wildlife through education and advocacy and is headquartered in Fairbanks.

We wish to offer comments on proposals 18-03; 18-04; 18-05 and 18-14.

18-04 - to increase the wolf quota take from 20% to 30% of the estimated population in GMU 2.

We ask that this change be rejected. The population of wolves is very low and efforts to enforce past quotas have been very poorly managed. An article detailing a management failure for this population of wolves in the March 14, 2017 of the Ketchikan Daily News reveals 26 wolves were harvested VS. the quota of 11, exceeding 2.6 times the quota. The quota has also been exceeded prior years. In 2016 an ADFG decision to close was made on 12/16 through a press release announcing an Emergency Closure issued 3 days later, giving trappers another 14 days to retrieve traps and have hides sealed.

The final take is 28 plus illegal and unreported beyond that. Illegal past takes are reported to be as high as half of legal take. ADFG Regional Supervisor Ryan Scott is quoted in the article thus: "There's delay in reporting...it's part of the process...it's a difficult process." We note the ADFG responsibility of the management of this hunt is essentially out of control and an abject failure. This hunt should in fact be closed completely given the admitted inability to manage it and the need for this population to recover to a normal historic level.

18-03 To extend the wolf season in Units 1A and 1B. We note the inability to manage as a matter of record outlined in the above explanation as a principle violated that very likely extends to these units and should not be repeated here made worse by poor management. We urge this proposal to extend the season be denied.

18-05 No limit for trapping wolves GMU 1. This is excessive and also is subjected to noted generally failed management as a matter of record and should be denied.

18-24 Use of snowmachines to “position” wolverines, wolves and caribou is vigorously opposed. The proposal would allow, nay, encourage, chasing ...not “positioning” ...wildlife to exhaustion and amounts to nothing more than extreme gross harassment. That can not be identified as a tradition. To permit what’s proposed here will earn subsistence a deserved very poor reputation in very high negatives and quickly. It must not be enacted. It is a virtual kiss-of-death for subsistence proposal.

In closing we have a word of advice. Upon reading the 125 or so pages of the transcript of the March 2017 Southeast Regional Council meeting, it is especially disturbing that no recognition or even a hint of acknowledgement of the fact that these are public lands belonging to all Americans was anywhere to be found. As you deliberate these proposals, we, Alaskans FOR Wildlife, wish to emphasize that there is a very broad interest in Alaska’s federal public lands and its wildlife. Do not treat wildlife on these lands as a sole possession.

Not even a hint of the broader public interest and values is present in the regional council discussion including by state ADFG and federal agency personnel participating. We see none in the proposal justifications either. We have real fear that this insular attitude prevails throughout, and if we are correct, this is wrong and eventually will cause trouble for the subsistence populations involved, promise.

We urge all involved including agency managers and regional council leadership and members that you all please must consider the big picture if you are to survive and flourish in the public eye. Be assured that the proposed actions and implementation and failures are being carefully watched. Social media for one will capture your actions and make life very difficult over a short time. Please act with wisdom and a genuine recognition that, federal subsistence law notwithstanding, you are all obligated to share public lands and the riches that dwell there.

Thank you for considering our participation.

Jim Kowalsky
Chair
Alaskans FOR Wildlife
PO Box 81957
Fairbanks, AK 99708
907 488 2434



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 7:51 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Francis Mauer** <fmauer@mosquiconet.com>
Date: Thu, Aug 3, 2017 at 9:02 PM
Subject: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz
To: subsistence@fws.gov

Comments Regarding Federal Subsistence Proposals: WP 18-03, 18-04, 1805, 18-24, and 18-51

Submitted to the Federal Subsistence Board by Fran Mauer, P.O. Box 80464, Fairbanks, AK 99708. August 3, 2017.

WP 18-03 I am opposed to extending the wolf hunting and trapping seasons in Unit 1. Wolves are highly vulnerable to harvest as it is, further extending of seasons is not justified, and would likely lead to excessive harvest of wolves as occurred on Prince of Wales Island last year which was supposed to be regulated by a quota, but even with quota rules in place the actual harvest exceeded the quota by 2.6 times. This proposal should be denied.

WP 18-04 This proposal would allow 30% of the wolf population on Prince of Wales Island to be harvested when existing harvest is 20%. As noted above, wolves are highly vulnerable to harvest, and last year's harvest exceeded the quota by 2.6 times! The extensive network of roads and trails on Prince of Wales render wolves exceptionally vulnerable. Expanding the harvest to 30% of the population following excessive harvest last year can not be justified given the failed management of this quota system last year. This proposal would lead to excessive harvest of an already depleted population and should be denied to conserve wolves on the Island.

WP 18-24 This proposal will open the door to harassment of wildlife by snow machines and violate a basic premise of hunting: respect for animals and fair chase principles. It would also result in excessive impacts to other animals that are not harvested due to disturbance associated with this "practice." Furthermore, it will exacerbate difficulty in enforcement of harassment rules. Approval of this proposal would give a black eye to subsistence in general, and certainly the Federal Subsistence Board, specifically for condoning such an inappropriate practice on the Federal public lands of Alaska. Deny this proposal.

WP 18-51 This proposal would lower Federal standards for baiting to the lowest common denominator: State requirements. By allowing the use of human food items such as syrup, old dough nuts and other human refuse will habituate bears to humans and contribute to human – bear conflicts, and expose innocent people to risks from bears that no longer fear humans. Every spring the Alaska Dept of Fish and Game sponsors public service announcements advising folks to keep their garbage and bird feeder refuse secure from bears, clearly stating the danger to humans from habituated bears. There is absolutely no justification to also allow the use of human foods and scent to bait bears. I urge the Board to reject this proposal (18-51).

Thank you for the opportunity to comment.

Fran Mauer

American Society of Mammalogists

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Theo Matuskowitz
Chair, Federal Subsistence Board
Office of Subsistence Management
1011 E. Tudor Rd. M/S 121
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2 August 2017

Dear Mr. Matuskowitz:

On behalf of the American Society of Mammalogists (ASM), the world's oldest and largest professional society devoted to the scientific study of wild mammals, I am sending you a position letter to be included among comments to **WP18-04** (2018-2020 Wildlife Proposals, page 5 - <https://www.doi.gov/subsistence/proposal/current>), a wildlife proposal to increase harvest limits on wolves in Unit 2, Southeast Federal Subsistence Resource Region. We strongly support the conservation and responsible use of wild mammals based on current, sound, and accurate scientific knowledge. The Society has a long history of reviewing issues related to mammalian conservation, and where appropriate, adopting positions on issues concerning the conservation and responsible management of mammals and their habitats based upon our scientific expertise.

The ASM is concerned about the conservation of the Alexander Archipelago wolf (*Canis lupus ligoni*), a taxon of concern in southeastern Alaska since the 1980s (Person et al. 1996, USFS 1997, 2008; USFWS 1997; USFWS 2014). This endemic subspecies is geographically, morphologically, and genetically distinct from other gray wolves (*C. lupus*), is unique to the North Pacific Coast (Cook et al. 2006, MacDonald and Cook 2007, Cook and MacDonald 2013), and constitutes a significant portion of the genetic diversity of *C. lupus* in North America (Goldman 1937, 1944; Person et al. 1996; Weckworth et al. 2005, 2010, 2011, 2015; Munoz-Fuentes et al. 2009; Cronin et al. 2015). The Alexander Archipelago wolf (*Canis lupus ligoni*) was recently considered by the U.S. Fish & Wildlife Service (USFWS) for protection under the Endangered Species Act (ESA) as a threatened or endangered species, with a positive 90-day finding that listing "may be warranted" (USFWS 2014). Although a final finding of "not warranted" was issued in 2015 (USFWS 2015a), the Final Status Assessment concluded that "Nonetheless, the persistence of the GMU2 population is desired and requires careful

management actions and decisions to ensure its future health” (USFWS 2015b). One of the areas of greatest conservation concern for *C. l. ligoni* is the population located on Prince of Wales Island. This particular population is geographically and genetically isolated from other populations of *C. l. ligoni* (Weckworth et al. 2005), and is one of the most threatened of any wolf population.

Specifically, the ASM is concerned about the Southeast Alaska Regional Advisory Council’s proposal to increase the annual harvest rate to “30% of the most recent unitwide, pre-season population estimate” because, unlike the Council (response to question 4, What impact will this change have on wildlife populations?), we already suspect conservation concern is justified for the following reasons. Based on radio-telemetry (Person et al. 1996), the Prince of Wales Archipelago (POWA) wolf population was estimated to be 250–350 in the mid-1990s; however, a decline in this population was noted beginning around 2008 (Person 2010). In 2010, the Alaska Dept. of Fish & Game (ADFG) resumed fieldwork that included radio-telemetry and other census methods in central POWA, and over the next few years documented few wolves and little wolf sign (Person 2010). In 2013, ADFG documented 80% mortality within their central POWA study area (Person and Larsen 2013). Since that time, even with reduced harvest quotas to 20%, midrange population estimates of POWA of 89 individuals for fall 2014 (ADFG 2015b) and 108 individual for fall 2015 (ADFG 2016) are very low. Arguably, increasing the harvest rate to 30% would facilitate further declines and increase risk of extirpation.

Telemetry studies have shown the impact of illegal harvest on this population to be substantial, representing as much as 37% of the total known mortality between 2012 and 2015 (Roffler et al. 2016: Table 4). Moreover, the existing regulation of allowing hunters/trappers 2 weeks to report legal wolf harvests can be ineffective in curtailing legal overharvests and thus significantly contribute to unexpected annual mortality. Indeed, because of the delay that can occur between documenting total legal harvest and subsequent emergency closure, 29 wolves were “legally” harvested in 2016 (ADF&G, personal communication) when the legal harvest quota had been established at 11 (ADF&G-Tongass National Forest News Release, 25 August 2016). The additive impact of illegal and legal overharvests, and the failure to account adequately for those effects in establishing harvest quotas is likely responsible for recent population declines.

Human access provided by the high density of approximately 4,500 km of logging roads in POWA is directly related to high wolf mortality in the area and particularly the illegal take of wolves (Person and Russell 2008; Person 2013, 2014; Wolf Technical Committee 2017). The primary prey of wolves is Sitka black-tailed deer, and the perceived competition between hunters and wolves for deer is one cause for the unsustainable human take of wolves on POWA (Farmer and Person 2000; Brinkman 2009, Brinkman et al. 2009; Person and Russell 2008; Person 2013, 2014). Whereas this competition already is a mortality factor for wolves, deer numbers are expected to plummet as a result of the “succession debt” from past, current, and planned logging, with former old-growth forest winter deer habitat becoming essentially of no value to deer at least 30 years after logging (Person and Brinkman 2013) and possibly for as long as 150 years after logging (Hanley et al. 1984). This decline in prey, regardless of wolf harvest, will itself pose a significant threat to POWA wolf persistence.

Despite this evidence, the U.S. Forest Service (USFS) claims that further increases in the density of logging roads and further losses of the old-growth habitat preferred by deer to contemporary logging are not problematic for *C. l. ligoni*. This USFS perspective is exemplified by the 2016 revision of the Tongass Forest Plan, which promotes additional harvest of old-growth forests with construction and renovation of logging roads. Indeed, the Big Thorne timber project in central Prince of Wales Island, the agency's largest timber sale on the island in over 20 years, will take 148.9 million board feet of timber from 8,500 acres of logging units in old-growth forest (USFS 2013). ASM strongly disagrees with this claim and with the renewed policy of old-growth logging and expansion of logging roads (see ASM 2015, USFS 2016, Wolf Technical Committee 2017). Moreover, in July 2017 the USFS issued for public comment a proposed action for a multi-faceted project on Prince of Wales Island (the POW LLA Project) that includes an additional 200 million board feet of logging of oldgrowth forest (USFS 2017).

In addition, the interagency report "Wolf habitat management program: GMU2 recommendations" released in March 2017 has several problems including that old-growth forests receive minor attention, but instead there is an emphasis on "restoration" of young growth forests for deer habitat. Sections of this document on wolf mortality, road management and den management should be improved. For example, road management is focused primarily on closures rather than emphasizing the need to not add new roads to the already high density of roads in GMU2.

In response, the American Society of Mammalogists calls upon (1) the Federal Subsistence Board to reject the proposed increase in annual harvest rate threshold to 30%; (2) The Alaska Department of Fish & Game to issue an emergency order (EO) closing Game Management Unit 2 (GMU2) to the hunting, trapping, or other take of wolves until the wolf population there can be verified to exceed 200 animals on the low end of the estimate range; and (3) the U.S. Forest Service to cease the construction of new roads and clearing of old growth forests on its lands within GMU2, including those of the Big Thorne project.

In summary, we believe that the circumstances as outlined above require immediate action on the part of the Federal Subsistence Board, ADFG, and USFS to conserve this unique subspecies of the gray wolf, including the wolves on Prince of Wales Island. The ASM greatly appreciates your close consideration of our comments and suggestions on this very important issue and stands ready to lend our collective expertise to help you resolve this issue.

Sincerely yours,



Robert Sikes, Ph.D.
President,
American Society of Mammalogists

Cc: Beth Pendleton, Regional Forester
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Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–05 Executive Summary	
General Description	Proposal WP18–05 requests lengthening the Federal hunting and trapping seasons for wolves in Unit 3 to match those currently under State regulations. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p>Unit 3 – Wolf (hunting)</p> <p>5 wolves <i>Aug. 1 – Apr. 30</i> May 31</p> <p>Unit 3 – Wolf (trapping)</p> <p>No limit. <i>Nov. 10 – Apr. 30</i></p>
OSM Preliminary Conclusion	Support
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	

WP18–05 Executive Summary	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	4 Oppose

**DRAFT STAFF ANALYSIS
WP18-05**

ISSUES

Proposal WP18-05, submitted by Southeast Alaska Subsistence Regional Advisory Council (Council), requests lengthening the Federal hunting and trapping seasons for wolves in Unit 3 to match those currently under State regulations.

DISCUSSION

The proponent seeks to bring the Federal subsistence hunting and trapping seasons for wolves in Unit 3 into alignment with current State seasons which are currently longer than Federal seasons. The proponent states that this proposal will allow for more harvest opportunity for Federally qualified subsistence users. The proposal provides for consistent regulations with the State by extending the Federal hunting season by one month and moving the start date of the Federal trapping season forward to November 1.

Existing Federal Regulation

Unit 3 – Wolf (hunting)

5 wolves

Aug. 1 – Apr. 30

Unit 3 – Wolf (trapping)

No limit.

Nov. 10 – Apr. 30

Proposed Federal Regulation

Unit 3 – Wolf (hunting)

5 wolves

Aug. 1 – ~~Apr. 30~~ May 31

Unit 3 – Wolf (trapping)

No limit.

Nov. 10 – Apr. 30

Existing State Regulation

Unit 3 – Wolf (hunting)

5 wolves. Hides must be sealed within 30 days of kill.

Aug. 1-May 31

Unit 3 – Wolf (trapping)

No limit. Wolves must be sealed within 30 days after the close of the season.

Nov. 1-Apr. 30

Extent of Federal Public Lands

Federal public lands comprise approximately 90% of Unit 3 and consist of 90% U.S. Forest Service (USFS) managed lands (see **Unit 3 Map**).

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for wolves in Unit 3. Therefore, all Federally qualified subsistence users may harvest this species in this unit.

Regulatory History

From 1915 through the early 1970s, a cash bounty was paid for wolves in Southeast Alaska (ADF&G 1997). Biological and harvest information has been collected on harvested wolves since the early 1960s. Harvest records from 1961–62 and from 1970–71 are derived from bounty payments. A mandatory sealing program under State regulation has been in effect since that time (ADF&G 1989).

The Board adopted existing State hunting and trapping regulations for Unit 3 in 1990. In 2010, the Board rejected proposals WP10-23 and WP10-24 which would have shortened both the Federal hunting and trapping seasons for wolves in this unit.

In 1994, the Alaska State Legislature enacted the “Intensive Management Law.” The law requires that the Alaska Board of Game (BOG) designate intensive management populations, for which human consumptive use is the highest priority use and to set population and harvest objectives in those areas. When deer populations or harvest objectives for deer in a unit fail to meet management objectives, the BOG must consider and evaluate intensive management actions (including predator control) as a means of attaining the objectives. In 2000, the BOG designated Unit 3 deer as an intensive management population. While the intensive management plan for a portion of Unit 3 was authorized by the BOG in March 2013, predator control has remained inactive pending refinement of techniques for accurately measuring changes in deer and wolf abundance (Lowell 2012). Although Unit 3 deer populations are believed to be below carrying capacity (Lowell, 2015) no harvest restrictions are deemed necessary. Unit 3 experienced above average snowfall during winters from 2006-2009 and those harsh winter conditions caused a decline in the deer population. While deer populations remain relatively low in the Unit, there are currently no conservation concerns for deer in Unit 3.

Biological Background

Wolves likely moved into Southeast Alaska following postglacial immigration and establishment of Sitka black-tailed deer populations (Lowell 2006). Wolves occur throughout the Southeast Alaska mainland and on all of the major islands except Admiralty, Baranof and Chichagof Islands in Unit 4. Wolves are proficient swimmers and regularly travel between adjacent islands in search of prey (Porter 2006). Wolves live throughout the islands and mainland of Southeast Alaska, although densities on the mainland are generally lower than on maritime-influenced islands (Porter 2012).

Deer are the primary food source of wolves in Southeast Alaska (Lowell 2006), with wolf predation studies estimating that one wolf takes an average of 26 deer per year (Person et al. 1996). Other prey species include mountain goat, moose, small mammals, beaver, salmon and waterfowl (Szepanski et al. 1999).

Habitat

Most of Unit 3 is Federal public land and has experienced a significant amount of logging activity over the years. Sitka black-tailed deer inhabit most Unit 3 islands, and this habitat is important for wolves. Deer populations on these islands have historically fluctuated with high and low extremes, however habitat removal greatly reduces winter carrying capacity in some areas. Population declines for both deer and wolves can result from severe winter weather and may be exacerbated by reduced deer winter habitat capability (Lowell 2012).

Recent population indices

Wolf populations are difficult to assess in Southeast Alaska due to the dense forest cover and their mobility. Current estimates of the Unit 3 wolf population are based on average territory and pack size derived from extensive wolf research conducted in similar habitat on Prince of Wales Island (Person et al. 1996). Based on the amount of suitable habitat below 1,800 feet in elevation, it has been estimated that approximately 23 packs of wolves may represent a population of 125-385 animals. Past conversations with trappers, hunters, pilots and other biologists, along with information obtained through trapper questionnaires, suggests wolf numbers increased during the 1990s in response to an increase in deer numbers. More recently, increases in moose abundance and distribution are believed to have helped to sustain high wolf numbers in Unit 3 (Lowell 2012).

Harvest History

Wolves can be harvested either with a firearm under hunting regulations or by trap, snare or firearm under trapping regulations (**Table 1**). Wolf harvest is affected by local weather conditions, wolf abundance and local fuel prices. Persistent freezing results in icing of traps and snares often making sets inoperative, and deep snow can bury snares and trail sets rendering them useless. Deep and persistent snow can also block vehicle access to many of the logging roads. In most years, trapping is the primary method of taking wolves in Unit 3, with access to harvest locations being by boat (**Table 2**). During some years, however, the number taken with the use of a firearm has exceeded those taken by conventional trapping methods. Most of the wolves taken by hunters are harvested opportunistically during hunts for other species.

Harvest has been reported in all months (**Table 3**), with the majority of the May harvest (94%) being taken by nonresidents (Schumacher 2017, pers. comm.). Pelt quality in May is reduced which most likely explains the low harvest levels by Federally qualified subsistence users. Although much of Unit 3 is not

Table 1. Unit 3 wolf harvest by method, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Firearm	11	15	24	17	25	28	24	22	11	10	4
Snare	10		11	9	11	31	8	10	14	25	20
Trap	23	6	19	16	18	37	41	60	37	28	19
Totals	44	21	54	42	54	96	73	92	62	63	43

*2016 data is preliminary

Table 2. Transportation used to harvest wolves in unit 3, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Vehicle	2	1	6	4	6	13	9	9	19	12	3
Boat	41	18	39	32	30	62	57	72	42	48	34
4 wheeler	1	2	2	1	1	16	4	5		2	
Other ATV				1				2			1
Snowmobile					1	1		1			5
Foot		1	6	3	12	4	1	1	1		
Airplane				1	4		1	2		1	
Other		1	1				1				
Totals	44	21	54	42	54	96	73	92	62	63	43

*2016 data is preliminary

Table 3. Unit 3 wolf harvest by month, 2006-2016 (Schumacher 2017, pers. comm.).

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Aug	2	1		1	2		1		1		
Sept	5	3	5	5	4	11	5	2	1	2	
Oct	1	3	5	3	2	2	2	6	4	3	1
Nov		1	3	1	7	3	5	4	2	2	2
Dec	2	1	11	9	7	2	8	6	7	2	7
Jan	9	3	1	4	9	14	11	13	12	4	5
Feb	10	1	10	10	8	16	5	9	8	11	19
Mar	13	3	6	6	6	33	16	21	9	30	8
Apr	2	5	13	3	7	6	9	24	15	8	17
May					2	9	11	7	3	1	
Totals	44	21	54	42	54	96	73	92	62	63	43

*2016 data is preliminary

hunted or trapped, it is believed that most wolf hunting and trapping occurring in the unit is recreational and viewed as a means of controlling wolves in order to improve deer and moose populations (Lowell 2012).

Effects of the Proposal

If adopted, this proposal would provide increased harvest opportunity for Federally qualified subsistence users in Unit 3. The proposal is unlikely to substantially increase the harvest of wolves taken in Unit 3 because Federally qualified users can already harvest on the same lands during the same time period and with the same total State and Federal combined trapping and hunting limits that are currently allowed under State regulations.

Federal regulations allow for the customary trade of products crafted from animals harvested during Federal seasons. Customary trade is not allowed under State regulation. Adoption of the proposal would allow for customary trade to occur from wolves harvested during the extended Federal hunting and trapping seasons. Despite increased opportunity for customary trade, this proposal would not be likely to substantially increase the harvest of wolves over present levels as pelt quality is reduced during these periods. However, if increased trade opportunity increases the value and interest of wolf harvest during the proposed season extensions, then slight increases in harvest could result from this proposal.

Harvest during May when wolves are denning (Person and Russell 2009) could result in mortality of breeders or helpers influential of pack persistence, denning and recruitment rates, and population growth, especially when pack sizes are less than six wolves (Brainerd et al. 2008; Borg et al. 2015). While this proposal would not be expected to result in substantially increased harvest in May, slight increases in harvest could occur if the value of increased trading opportunity increases harvest interest for Federally qualified users. A slight harvest increase during the denning period could result in further impacts if breeders or helpers are harvested from small packs. Though current pack sizes in Unit 3 are not known, pack sizes on Revillagigedo Island during the 1980s averaged 5.4 wolves and ranged in size from 2-12 wolves (Smith et al. 1987), on Prince of Wales and Kosciusko Islands averaged 5.6 wolves (standard deviation (sd) 3) in the spring of 1995 (Person et al. 1996) and on northcentral Prince of Wales Island averaged 3.9 wolves (sd=1.6) from 2012-2015 (Roffler et al. 2016). Therefore, extension of the Federal season into May with a State season already encompassing May could affect wolf numbers.

OSM PRELIMINARY CONCLUSION

Support Proposal WP18-05

Justification

Adopting this proposal will bring Federal hunting and trapping seasons for Unit 3 into alignment with State regulations that are currently longer than Federal seasons. Federally qualified subsistence users can already harvest wolf during the longer State seasons. Adoption of this proposal would allow subsistence users to engage in customary trade if they desire from any wolves harvested from Federal lands within the expanded seasons. With pelt quality being of a less than prime during the proposed season extensions, it

is unlikely that harvests would increase specifically for engaging in customary trade.

Wolf harvest in Unit 3 is currently believed to be occurring at a sustainable level based on anecdotal accounts and harvest rates. Harvests in both November and May are currently very low in comparison to other months. Alignment of Federal regulations with the State regulations should not dramatically increase harvests beyond current levels as the majority of the May harvest is not being taken rural users.

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WRITTEN PUBLIC COMMENTS



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 1:55 PM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Sharon Alden** <fwxsca@yahoo.com>
Date: Fri, Aug 4, 2017 at 1:52 PM
Subject: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24
To: "subsistence@fws.gov" <subsistence@fws.gov>

To: Office of Subsistence Management
Attention: Theo Matuskowitz
From: Sean McGuire
Re: comments on proposal WP 18-51, 18-03, 18-4, 18-5, 18-24

I am opposing proposal WP 18-51 There should be no human food or any human substance to bait any animals. This is so basic. The last thing we want is to habituate bears or any wild animal to human food. This is an ethical as well as a safety issue. The last thing we want to see is the federal baiting regulations aligned with the state of Alaska's. The State baiting regulations are painfully out dated and present a glaring safety issue.

I am opposing proposal WP 18-03 the extended hunting and trapping season in game unit one. Over kill.

I am really opposed to proposal WP 18-04. Why in the world would you want to put more pressure on a wolf population that's already in trouble this appears to be contrary to the basic concept of wildlife management?

I am also opposing proposal WP 18-05 relates to my opposition to WP18-04.

I am also opposing in the strongest possible terms proposal WP 18-24 To heard wildlife with snow machines is one of the most unethical things I can imagine and the backlash would be harsh.

Thank you for your attention
Sean McGuire
159 Kniffen Rd
Fairbanks, Ak.
ph 907-888-0124
email fwxsca@yahoo.com

August 1, 2017

TO: Federal Subsistence Board 4 pages
Attention Theo Matuskowitz
FR: Alaskans FOR Wildlife, Jim Kowalsky, Chair
RE: Comments of proposals 18-03; 18-04; 18-05
4 pages

Alaskans for Wildlife is a statewide member Alaska organization promoting naturally occurring wildlife through education and advocacy and is headquartered in Fairbanks.

We wish to offer comments on proposals 18-03; 18-04; 18-05 and 18-14.

18-04 - to increase the wolf quota take from 20% to 30% of the estimated population in GMU 2.

We ask that this change be rejected. The population of wolves is very low and efforts to enforce past quotas have been very poorly managed. An article detailing a management failure for this population of wolves in the March 14, 2017 of the Ketchikan Daily News reveals 26 wolves were harvested VS. the quota of 11, exceeding 2.6 times the quota. The quota has also been exceeded prior years. In 2016 an ADFG decision to close was made on 12/16 through a press release announcing an Emergency Closure issued 3 days later, giving trappers another 14 days to retrieve traps and have hides sealed.

The final take is 28 plus illegal and unreported beyond that. Illegal past takes are reported to be as high as half of legal take. ADFG Regional Supervisor Ryan Scott is quoted in the article thus: "There's delay in reporting...it's part of the process...it's a difficult process." We note the ADFG responsibility of the management of this hunt is essentially out of control and an abject failure. This hunt should in fact be closed completely given the admitted inability to manage it and the need for this population to recover to a normal historic level.

18-03 To extend the wolf season in Units 1A and 1B. We note the inability to manage as a matter of record outlined in the above explanation as a principle violated that very likely extends to these units and should not be repeated here made worse by poor management. We urge this proposal to extend the season be denied.

18-05 No limit for trapping wolves GMU 1. This is excessive and also is subjected to noted generally failed management as a matter of record and should be denied.

18-24 Use of snowmachines to “position” wolverines, wolves and caribou is vigorously opposed. The proposal would allow, nay, encourage, chasing ...not “positioning” ...wildlife to exhaustion and amounts to nothing more than extreme gross harassment. That can not be identified as a tradition. To permit what’s proposed here will earn subsistence a deserved very poor reputation in very high negatives and quickly. It must not be enacted. It is a virtual kiss-of-death for subsistence proposal.

In closing we have a word of advice. Upon reading the 125 or so pages of the transcript of the March 2017 Southeast Regional Council meeting, it is especially disturbing that no recognition or even a hint of acknowledgement of the fact that these are public lands belonging to all Americans was anywhere to be found. As you deliberate these proposals, we, Alaskans FOR Wildlife , wish to emphasize that there is a very broad interest in Alaska’s federal public lands and its wildlife. Do not treat wildlife on these lands as a sole possession.

Not even a hint of the broader public interest and values is present in the regional council discussion including by state ADFG and federal agency personnel participating. We see none in the proposal justifications either. We have real fear that this insular attitude prevails throughout, and if we are correct, this is wrong and eventually will cause trouble for the subsistence populations involved, promise.

We urge all involved including agency managers and regional council leadership and members that you all please must consider the big picture if you are to survive and flourish in the public eye. Be assured that the proposed actions and implementation and failures are being carefully watched. Social media for one will capture your actions and make life very difficult over a short time. Please act with wisdom and a genuine recognition that, federal subsistence law notwithstanding, you are all obligated to share public lands and the riches that dwell there.

Thank you for considering our participation.

Jim Kowalsky
Chair
Alaskans FOR Wildlife
PO Box 81957
Fairbanks, AK 99708
907 488 2434



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 7:51 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Francis Mauer** <fmauer@mosquiconet.com>
Date: Thu, Aug 3, 2017 at 9:02 PM
Subject: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz
To: subsistence@fws.gov

Comments Regarding Federal Subsistence Proposals: WP 18-03, 18-04, 1805, 18-24, and 18-51

Submitted to the Federal Subsistence Board by Fran Mauer, P.O. Box 80464, Fairbanks, AK 99708. August 3, 2017.

WP 18-03 I am opposed to extending the wolf hunting and trapping seasons in Unit 1. Wolves are highly vulnerable to harvest as it is, further extending of seasons is not justified, and would likely lead to excessive harvest of wolves as occurred on Prince of Wales Island last year which was supposed to be regulated by a quota, but even with quota rules in place the actual harvest exceeded the quota by 2.6 times. This proposal should be denied.

WP 18-04 This proposal would allow 30% of the wolf population on Prince of Wales Island to be harvested when existing harvest is 20%. As noted above, wolves are highly vulnerable to harvest, and last year's harvest exceeded the quota by 2.6 times! The extensive network of roads and trails on Prince of Wales render wolves exceptionally vulnerable. Expanding the harvest to 30% of the population following excessive harvest last year can not be justified given the failed management of this quota system last year. This proposal would lead to excessive harvest of an already depleted population and should be denied to conserve wolves on the Island.

WP 18-24 This proposal will open the door to harassment of wildlife by snow machines and violate a basic premise of hunting: respect for animals and fair chase principles. It would also result in excessive impacts to other animals that are not harvested due to disturbance associated with this "practice." Furthermore, it will exacerbate difficulty in enforcement of harassment rules. Approval of this proposal would give a black eye to subsistence in general, and certainly the Federal Subsistence Board, specifically for condoning such an inappropriate practice on the Federal public lands of Alaska. Deny this proposal.

WP 18-51 This proposal would lower Federal standards for baiting to the lowest common denominator: State requirements. By allowing the use of human food items such as syrup, old dough nuts and other human refuse will habituate bears to humans and contribute to human – bear conflicts, and expose innocent people to risks from bears that no longer fear humans. Every spring the Alaska Dept of Fish and Game sponsors public service announcements advising folks to keep their garbage and bird feeder refuse secure from bears, clearly stating the danger to humans from habituated bears. There is absolutely no justification to also allow the use of human foods and scent to bait bears. I urge the Board to reject this proposal (18-51).

Thank you for the opportunity to comment.

Fran Mauer



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–06 Executive Summary	
General Description	Proposal WP18–06 requests the season for black bear in Unit 2 be lengthened from Sept. 1-June 30 to Aug. 24-June 30 and the harvest limit be increased from 2 to 4 bears. <i>Submitted by: Klawock Cooperative Association.</i>
Proposed Regulation	Unit 2—Black Bear <i>42 bear, no more than one may be a blue or glacier bear. Sept. 1– Aug. 24– June 30</i>
OSM Preliminary Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	

WP18-06 Executive Summary	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Oppose

**DRAFT STAFF ANALYSIS
WP18-06**

ISSUES

Proposal WP18-06, submitted by the Klawock Cooperative Association (KCA) requests the season for black bear in Unit 2 be lengthened from Sept. 1-June 30 to Aug. 24-June 30 and the harvest limit be increased from 2 to 4 bears.

DISCUSSION

The proponent believes the changes are necessary as they are concerned that black bear are having a negative effect on deer in Unit 2, particularly when coupled with extreme weather events and increased harvest of both species by nonresident hunters. Further clarification with the proponent indicated the proposal's intent is to use liberalized harvest of black bear as a means of reducing predation on deer. Following an explanation that the Federal Subsistence Board (Board) could not adopt regulations simply for predator control, the proponent indicated they still wanted to move the proposal forward to see the Board would support an increase to the season and harvest limit to benefit Federally qualified subsistence users.

Existing Federal Regulation

Unit 2—Black Bear

2 bear, no more than one may be a blue or glacier bear.

Sept. 1–June 30

Proposed Federal Regulation

Unit 2—Black Bear

4~~2~~ bear, no more than one may be a blue or glacier bear.

Aug. 24~~Sept. 1~~–June 30

Existing State Regulation

Unit 2 – Black Bear

Residents: Two bears

Sept. 1 – June 30

Nonresidents: One bear

Extent of Federal Public Lands

Federal public lands comprise approximately 72% of Unit 2 and consist of 72% U.S. Forest Service (USFS) managed lands (see **Unit 2 Map**).

Customary and Traditional Use Determinations

The Board has not made a customary and traditional use determination for black bear in Unit 2. Therefore, all Federally qualified subsistence users may harvest this species in this unit.

Regulatory History

The Board adopted existing State hunting regulations for black bear in Unit 2 in 1990. Since this time, there have been no proposals submitted through the Federal regulatory process regarding black bear in this unit.

Since statehood, the black bear hunting season has extended from Sept. 1-June 30, and the annual harvest limit for residents has been 2 bears, only 1 of which can be a blue or glacier bear. Nonresident and resident harvest limits were the same until 1990, when the nonresident limit was reduced to 1 bear per year. Statewide sealing of black bears has been required since 1973. In 2008, the Alaska Board of Game (BOG) required all black bear hunters to obtain a harvest ticket and harvest report prior to hunting. Proof of sex is required to remain naturally attached to the hide until sealing is completed. Although there are more specific seasons regarding unguided nonresident black bear hunting (draw hunts for either Jan-June or Sept.-Dec.), the season for residents and nonresidents hunting with a registered guide runs from September 1-June 30.

In September 2010, in response to the potential for unsustainable harvest because of a rapidly escalating black bear take by nonresidents, an alarming increase in female bear harvest along salmon streams, as well as Unit 2 residents expressing concern over increased traffic and hunting activity by nonresident hunters in the fall when many subsistence activities were occurring, Controlled Use Area (CUA) regulations were implemented. The CUA prohibited the use of motorized vehicles to hunt bears in Unit 2 from Sept. 1-Sept. 30. The BOG further modified the CUA regulations (extended time frame to October 31), as well as establishing draw hunts for all nonresident black bear hunters not using registered guides. As a result, the fall season (DL027) runs Sept. 1-Dec. 31 and the spring season (DL028) from Jan. 1-June 30. With the new regulations in place, the BOG did not reauthorize the CUA regulations when they expired in October 2012. Should the Unit 2 bear population rebound and show signs of sustaining additional harvest, the Alaska Department of Fish and Game has the authority within the new drawing regulations to increase the number of nonresident drawing permits issued each regulatory year (Scott 2017, pers. comm.).

The year round use of baiting for black bears was legalized in 1982. In 1988, the BOG limited baiting in Southeast Alaska to April 15-June 15. Federal regulations in Unit 2 also allow for the use of bait during this same time period.

In 1996, hunters were required to salvage the edible meat of all spring black bears killed in Southeast Alaska during Jan. 1–May 31. From June 1–Dec. 31, State regulations require either salvage of edible meat and skull or hide and skull. Federal regulations require salvage of the hide and edible meat year round as well as the skull being available during the sealing process.

In May 2004, the Board approved a predator control policy. Since the Board administers the subsistence taking and uses of fish and wildlife on Federal public lands through regulations that provide for the non-wasteful harvest of fish and wildlife by Federally qualified rural residents “... for direct personal or family consumption ...” (Section 803 of the Alaska National Interest Lands Conservation Act (ANILCA)), wildlife management activities on Federal public lands, such as predator control and habitat management, are the responsibility of and within the authority of the individual land management agencies. More specific detail regarding the Board’s policy can be found in **Appendix A**.

Biological Background

Black bears are found over most of the forested areas of the State. Depending on the season of the year, they may be found from sea level to alpine areas. In Southeast Alaska, black bears occupy most islands with the exceptions of Admiralty, Baranof, Chichagof, and Kruzof Islands which are inhabited by brown bears. Both bear species occur on the southeastern mainland.

Unit 2 contains some of the best black bear habitat in Southeast Alaska because of productive salmon streams, many large estuaries, and subalpine and alpine areas at lower, more hospitable elevations compared to mainland locations capable of supporting a large number of bears. The large average skull sizes of Unit 2 bears compared to other Southeast Alaska bears also suggest that Unit 2 is extremely productive black bear habitat (Bethune 2014).

Although there are abundant healthy and productive habitats, clear cut logging has occurred in Unit 2 more than in other Southeast Alaska management units. Counting national forest and private lands, the Alaska Department of Fish and Game (ADF&G) estimates about 475 mi² of forested black bear habitat in Unit 2 has been cut during the past 65 years, including over 40% of the old-growth forest. Logging-associated road building in Unit 2 has created the highest density of roads in Southeast, with more than 2,500 miles of drivable roads on national forest land and additional large tracts of roads on private Native corporation lands. The 2009 Access Travel Management Plan (ATM) by the USFS closed 150 miles of road to highway vehicles and converted an additional 222 miles from highway vehicle use to off highway vehicle (OHV) use only (USDA 2009). As a result of more than 40 years of large-scale clear cut logging, habitat changes continue to occur. Although early seral stages (3–20 years post-logging) provide black bears with abundant plant foods, later stages result in the disappearance of understory as conifer canopies close and light does not penetrate to the forest floor. Second-growth stands also lead to the decline of large hollow trees and root masses important for denning. It is believed that, although logging may create food for bears in the short term, the long-term result will be a decline in bear numbers in Unit 2 (Suring et al. 1988).

Recent population indices

No black bear population studies have been completed in Unit 2. Density estimates of North American black bears vary between 0.3 and 3.4 bears/mi², depending on the region and habitat conditions. At the high end, a Washington state study in forested Sitka spruce habitat that included logged areas comparable to Prince of Wales Island (POW) produced an estimated density of 3.4 bears/mi² (Lindzey and Meslow 1977).

Wood (1990) indicated that unlogged portions of Unit 2 contain some of the best black bear habitat in Southeast Alaska. Based on population estimates from other North America coastal areas (Poelker and Hartwell 1973), Wood estimated the Unit 2 black bear density at 1.5 bears/mi². Using Wood's density estimate, Larsen (1995) derived a population estimate of 5,400 bears for the unit. In calculating this estimate, Larsen assumed bear densities were not homogenous across the landscape.

In 2000, ADF&G supported a study on a 400mi² northern portion of Kuiu Island located in Unit 3 that used tetracycline biomarker mark-recapture technique to estimate black bear density. This study area was comprised of the most productive forest habitat on the island and included several major salmon producing streams and rivers. The research came up with a calculated density estimate of 3.9 bears/mi² (95% CI 1.8–5.6 bears/mi²) (Peacock 2004). This high density estimate is comparable with Lindzey and Meslow's (1977) peak estimate of black bears on Long Island, Washington. Because the Kuiu Island effort was focused on an island adjacent to Unit 2 with similar logging and habitat types, the results may be more applicable to Unit 2 bear populations than studies done elsewhere. Using Peacock's estimate of 3.9 bears/mi² gives a population estimate of 14,040 bears in Unit 2. This estimate is likely too high, as it assumes that the entire unit is comprised of the highest quality black bear habitat available. Indeed some areas in Unit 2, such as the southern portion, is mostly muskeg scrub and low volume forest with few major salmon streams. Other areas in Unit 2, such as Heceta Island and the other western islands likely have few if any bears. Therefore a better, more conservative approach is to use the lower end of Peacock's 95% Confidence interval (1.8 bears/mi²), which gives an estimate of 6,480 bears. It is currently estimated that the Unit 2 black bear population is lower than that estimate as the population appears to be depressed from highs seen in the 1990's and early 2000's. Plausible reasons for this decline include overharvest coupled with loss of habitat due to extensive logging in the unit over the past 50 years (Bethune 2014).

During the current and the previous reporting periods the ADF&G conducted 2 projects to help answer some of the questions surrounding the recent black bear population declines on POW. In 2008 a DNA mark-recapture pilot study in the central portion of POW was initiated in an attempt to calculate the black bear harvest rate. Efforts were intensified during the summer of 2009 and completed in 2010. The project used noninvasive breakaway single-capture noose snares equipped with barbed wire (Beier et al. 2005), and short barbed wire fences to capture hair from live bears. Bears were considered marked if a genetic signature was obtained from snagged hair samples. Recaptures were obtained from harvested bears during subsequent hunting seasons using tissue collected during the sealing process. This method gave a harvest rate of 9.2% (95% CI 0.034-0.188). Hunter harvest between 7-10 percent has proven to be a sustainable harvest rate in other bear populations in similar habitats (Scott 2017, pers. comm.). Unfortunately, large number of tissue samples from harvested bears from 2008–2010 were compromised or lost. New tech-

niques for collecting wolf DNA using scented hair boards are showing promise for use in future black bear density studies (Person and Larsen 2013) if this harvest rate work is ever duplicated (Scott 2017).

Harvest History

After averaging 123 bears per year during 1980–1988 and 221 bears annually from 1989 to 1995, harvest increased to an average of 353 bears from 1994–2002 (Bethune 2011). During 2003–2007 the average increased again to 431 bears annually, constituting a 350% increase in harvest over two decades. Harvest peaked in 2005 at nearly 500 bears (**Figure 1**) and has declined since. During the past 10 years, males have accounted for about 73% of the harvest and 74% of the total harvest has occurred during spring (Bethune 2014).

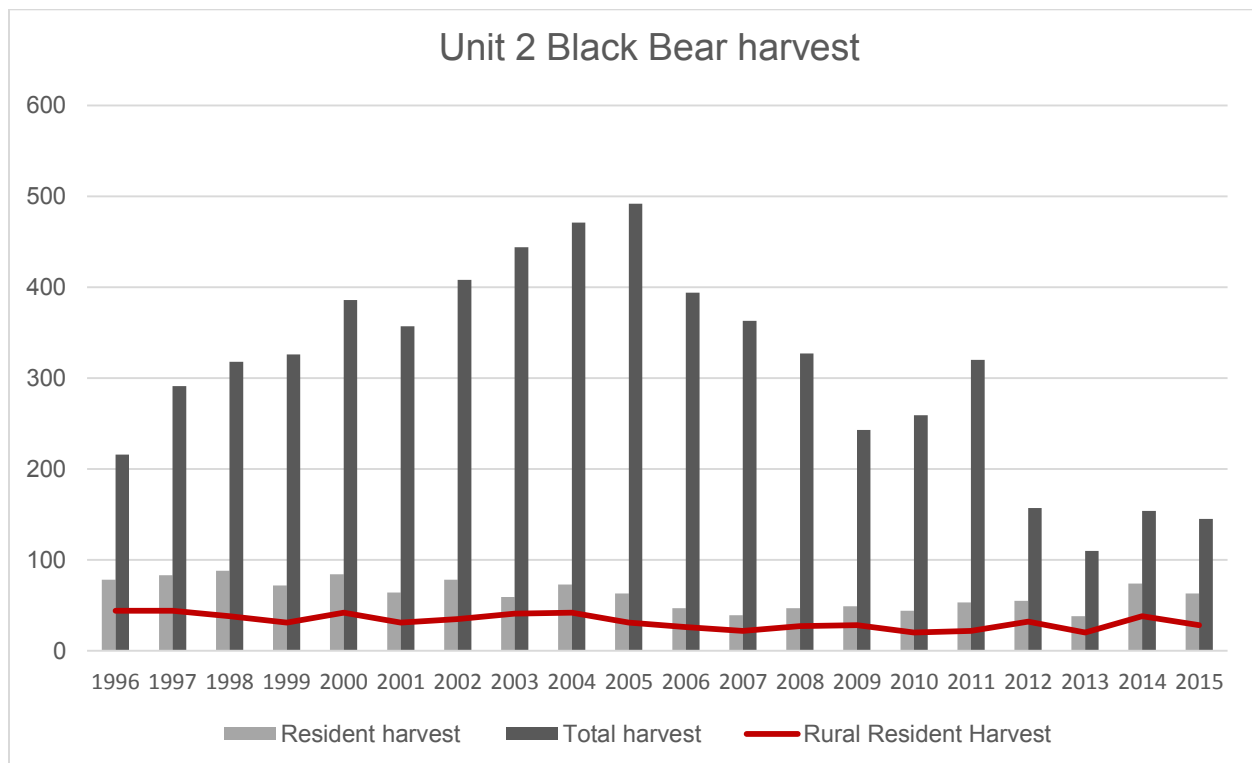


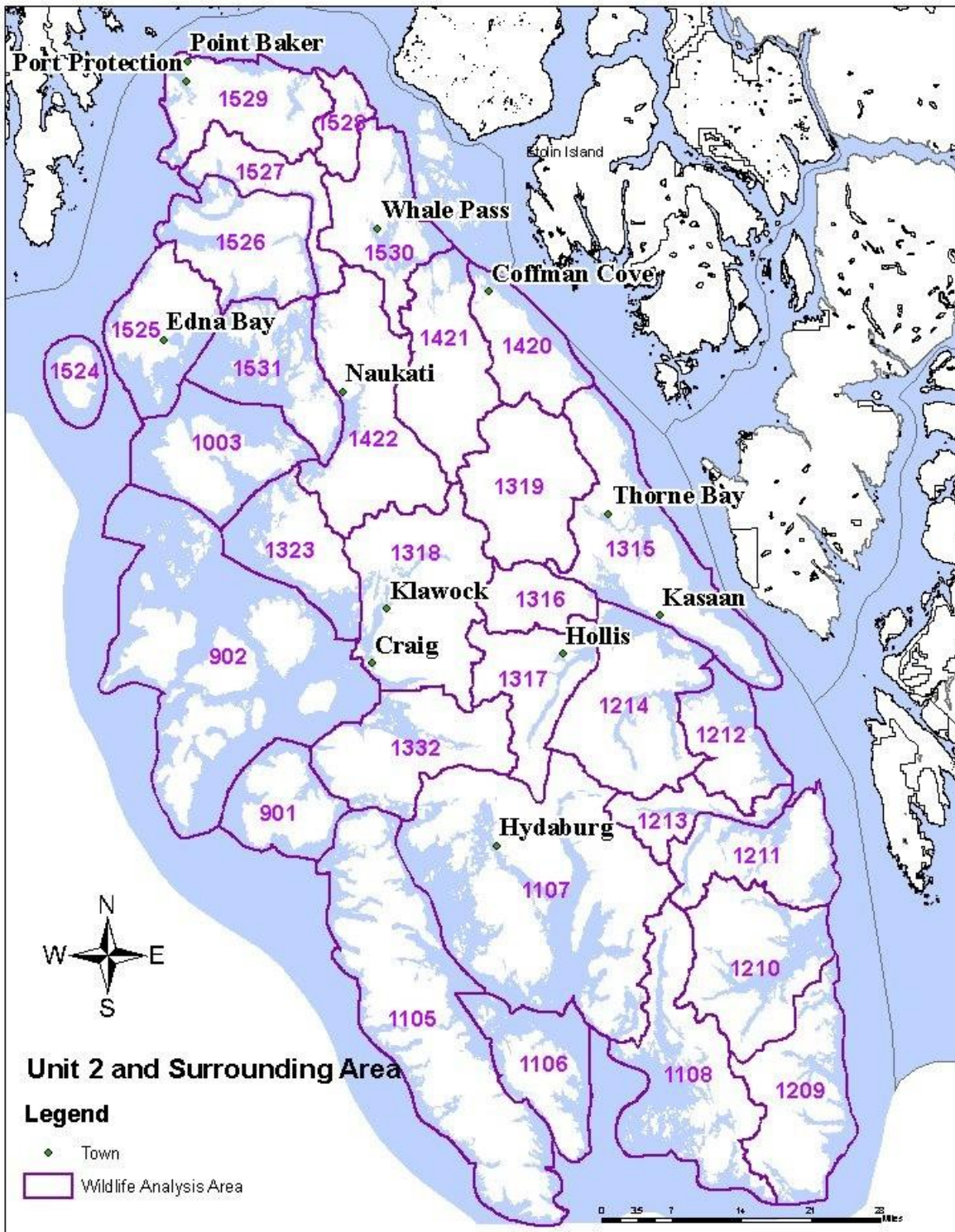
Figure 1. Overall black bear harvest, harvest by Alaska residents and by rural residents in Unit 2, 1996-2015 (Schumacher 2017, pers. comm).

Black bear harvest by nonresidents steadily increased during the past 25 years and topped out at 89% during 2004 and 2005. On average, Alaska residents living in Unit 2 accounted for 6% of the harvest, other Alaska residents another 9%, and the remaining 85% by nonresidents. The draw hunt for unguided nonresidents instituted in the 2012 regulatory year has reduced this percentage down to 65% of the harvest. Most nonresidents do not use a registered guide when black bear hunting in this unit. With recent changes to a draw hunt, guided hunts are slowly increasing but activities on Federal Lands are limited by the USFS Outfitter Guide Environmental Assessment and the 2012 Carrying Capacity Analysis for POW.

With availability of the extensive road system, numerous lodges and bed and breakfasts, and vehicle and skiff rentals, Unit 2 is a very popular and economical hunt for the do-it-yourself hunter wanting to experience Alaska. Field observations from staff, sealed harvests and anecdotal reports of lower bookings from lodges indicated fewer hunters came to Unit 2 in recent years. Economic recession, fuel prices or lower bear populations may be potential reasons for this apparent decline. However, it appears that hunter participation increased during the period leading up to the implementation of the limited draw hunt in 2012. It is likely that nonresident hunters came to Unit 2 in 2010 and 2011 knowing their chances to hunt POW in the future would be limited (Bethune 2014).

Until 1985 Unit 2 bear hunters used airplane, boat, and highway transportation in relatively equal amounts (Bethune 2011). However, logging-associated road construction peaked in the 1980s, and beginning in 1986, most hunters used the road system to access hunting areas. During the past 10 years, highway vehicles accounted for 43% of the transportation used by successful Unit 2 hunters while boats accounted for 53% (Table 4). Even boat-based hunters are using the extensive road system to access multiple waterways on a typical hunt. New highway improvement and paving projects continue to improve access on POW. These highway projects have improved hunter access to the island but will be countered somewhat by diminishing road access due to road closures associated with the Forest Service's ATM (Bethune 2014).

Historically, Wildlife Analysis Areas (WAAs) 1214, 1317 and 1422 accounted for approximately one-third of the annual harvest (**Map 1**). WAA 1422, which includes Tuxekan and El Capitan passages on west POW, offers easy road access. WAA 1317 (the area south and west of Hollis) provides easy boat access into the 12-mile Arm area. WAA 1214 includes the popular Polk and McKenzie Inlet regions. Additional WAAs that have received notable hunting pressure more recently include 1420 (Ratz Harbor to Coffman Cove on the east side of POW), WAA 1318 which encompasses the area around the communities of Craig and Klawock, POW's primary population center and which affords hunters easy road access, and 1530 (Whale Pass and Exchange Cove on the northeast corner of the island). Many of these areas also offer good boat access from saltwater along protected bays and passages. Several popular WAA's experienced significant declines in harvest beginning in approximately 2008–2009, most notably WAA's 1107 (Hydaburg area), 1210 (Moira Sound), 1211 (Cholmondeley Sound), 1317 (12-Mile Arm), 1319 (North Thorne), and 1422 (Tuxekan/El Cap) (Bethune 2014).



Map 1. Wildlife Analysis Areas (WAA) of Unit 2.

Effects of the Proposal

This proposal would only increase the harvest limit and season for Federally qualified users harvesting black bear on Federal public lands. Increasing harvest limits as proposed could allow for unsustainable harvests resulting in conservation issues similar to those documented in the recent past.

Adopting the proposal would create divergence between State and Federal regulations for Unit 2 black bear. With a large amount of State and Private land in Unit 2, the proposal may create confusion for both non-Federally qualified and Federally qualified subsistence users. The proposal would have no direct effect on non-Federally qualified subsistence users hunting black bear on Federal lands.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP18-06.

Justification

Conservative black bear regulations were established for nonresidents beginning in 2010 in response to unsustainable harvests. Although the black bear population in Unit 2 has seemed to increase, it is not at a level to increase harvests beyond the current regulations. Lastly, documented black bear harvest by Federally qualified subsistence users has been remarkably consistent which suggests subsistence needs are being met and that harvest limits and season do not need to be elevated to the proposed levels.

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WRITTEN PUBLIC COMMENTS



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <sub_sistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: sub_sistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

Appendix A

PREDATOR MANAGEMENT POLICY FEDERAL SUBSISTENCE BOARD

Adopted by the Federal Subsistence Board on
May 20, 2004

The Federal Subsistence Board recognizes that predators are an important component of Alaska's dynamic ecosystems, beneficial to maintaining balance, health, and diversity within associated wildlife populations and habitats. Furthermore, the Board recognizes the traditional Alaska Native cultural beliefs and values associated with wolves, bears and other predatory species, and the impact that predators can have on ungulate populations valued by subsistence users. In addition, the Board recognizes that predator control may be an appropriate management tool on some Federal public lands for restoring prey populations to provide for subsistence needs where predation has reduced or held prey populations at levels significantly below historical levels of abundance.

As authorized by the Secretaries of Interior and Agriculture [50 CFR Part 100.10 (USDI) and 36 CFR Part 242.10 (USDA)], the Board administers the subsistence taking and uses of fish and wildlife on Federal public lands through regulations that provide for the non-wasteful harvest of fish and wildlife by Federally qualified rural residents, consistent with the maintenance of healthy populations of harvested resources. Such subsistence taking and uses are “... *for direct personal or family consumption* ...” (Section 803 of ANILCA). Wildlife management activities on Federal public lands other than the subsistence take and use of fish and wildlife, such as predator control and habitat management, are the responsibility of and remain within the authority of the individual land management agencies.

Accordingly, the Board will:

- A. Consider all Federal proposals to regulated seasons and dates, methods and means, harvest limits, and customary & traditional use determinations for the subsistence take of fish and wildlife. The Board will ensure that the effect of its decisions is to provide for subsistence take and use of the subject species. The Board will also take into account approved population objectives; management plans, customary and traditional uses, and recognized principles of fish and wildlife management.
- B. Direct the Office of Subsistence Management to provide proponents of predator control proposals (all Federal proposals that specifically indicate that the reason for the proposed regulation(s) is to reduce the predator population to benefit prey populations), with procedures for submitting the proposal to the appropriate agency. Where predators have been determined to be a major contributing factor in the significant reduction of ungulate populations important for subsistence use, or in the chronic suppression of such populations at low densities, the Board will endorse timely, affirmative and effective action consistent with each respective agency's policies and management objectives, to reduce predator populations and allow affected ungulate populations to recover. The Board will monitor actions

taken by the agency to address such concerns, and will provide appropriate support where necessary to ensure the continuation of subsistence harvest opportunities.

- C. Ensure that the appropriate Regional Council(s) is informed of predator control proposals by having them printed in the Proposal Booklet and presented to the Council at the next appropriate Council meeting, along with other rejected proposals that address concerns which are outside the authorities of the Federal Subsistence Board.

WP18–09 Executive Summary	
General Description	Proposal WP18–09 requests that the Federal designated hunting provisions limit the number of Federally qualified recipients that a designated hunter may hunt deer for in Units 1B and 3. <i>Submitted by: Wrangell Fish and Game Advisory Committee</i>
Proposed Regulation	<p>§ __.26(n)(1)(vii) <i>Unit specific regulations:</i></p> <p><i>(F) In Unit 1B, a designated hunter may hunt deer for only five other specified recipients per year.</i></p> <p>§ __.26(n)(3)(iii) <i>Unit specific regulations:</i></p> <p><i>(F) In Unit 3, a designated hunter may hunt deer for only five other specified recipients per year.</i></p>
OSM Preliminary Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	

WP18–09 Executive Summary	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Support and 1 Oppose

DRAFT STAFF ANALYSIS WP18-09

ISSUES

Proposal WP18-09, submitted by Wrangell Fish and Game Advisory Committee, requests that the Federal designated hunting provisions limit the number of Federally qualified recipients that a designated hunter may hunt deer for in Units 1B and 3.

DISCUSSION

The proponent is concerned that the designated hunter program allows for over exploitation of deer within Units 1B and 3. The proponent states that some hunters use the designated hunting system to take upwards of 40-50 deer in a hunting season, sometimes taking only the hind quarters and back straps. The proponent believes that deer populations in these units will increase by limiting the number of recipients a designated hunter may harvest for during a season. More hunters would be successful and it would take less time to harvest their annual limit.

Existing Federal Regulations

Southeastern Alaska Area—General provisions

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

Unit 1B – Deer

2 antlered deer *Aug. 1 – Dec. 31*

Unit 3 – Deer

Unit 3 - Mitkof, Woewodoski, and Butterworth Islands – 1 antlered deer *Oct. 15 – Oct. 31*

Unit 3 – Kupreanof Island, that portion east of Portage Bay-Duncan Canal Portage – 1 antlered deer *Oct. 15 – Oct. 31*

Unit 3 remainder – 2 antlered deer *Aug. 1 to Nov. 30*

Dec. 1 – Dec. 31
season to be
announced

Proposed Federal Regulation

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

§ ___.26(n)(1)(vii) *Unit specific regulations:*

(F) In Unit 1B, a designated hunter may hunt deer for only five other specified recipients per year.

§ ___.26(n)(3)(iii) *Unit specific regulations:*

(F) In Unit 3, a designated hunter may hunt deer for only five other specified recipients per year.

Unit 1B – Deer

2 antlered deer

Aug. 1 – Dec. 31

Unit 3 – Deer

Unit 3 - Mitkof, Woewodoski, and Butterworth Islands – 1 antlered deer

Oct. 15 – Oct. 31

Unit 3 – Kupreanof Island, that portion east of Portage Bay-Duncan Canal Portage – 1 antlered deer

Oct. 15 – Oct. 31

Unit 3 remainder – 2 antlered deer

Aug. 1 to Nov. 30

Dec. 1 – Dec. 31

season to be

announced

Existing State Regulations

State regulations have similar provisions which allow residents that meet certain criteria to have someone else hunt for them. The State's system is referred to as "proxy" hunting and is governed by the following provisions:

An Alaska resident (the beneficiary) may obtain an authorization allowing another Alaska resident (the proxy) to hunt moose, caribou, or deer for them if they are blind, 70-percent disabled, 65 years of age or older or are developmentally disabled. A person may not be a proxy for more than one beneficiary at a time.*

**Definition of "70-percent disabled" – a person who presents to ADF&G either written proof that the person receives at least 70-percent disability compensation from a government agency for a physical disability or an affidavit signed by a physician licensed to practice medicine in the state, stating that the person is at least 70-percent disabled.*

Extent of Federal Public Lands

Federal public lands comprise approximately 97% of Unit 1B and consist of 97% U.S. Forest Service (USFS) managed lands (see Unit 1B Map). Federal public lands comprise approximately 90% of Unit 3 and consist of 90% USFS managed lands (see Unit 3 Map).

Customary and Traditional Use Determinations

Rural residents of Units 1A, 1B, 2, and 3 have a customary and traditional use determination for deer Unit 1B. Rural residents of Units 1B, 3, Port Alexander, Port Protection, Pt. Baker and Meyers Chuck have a customary and traditional use determination for deer in Unit 3.

Regulatory History

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. All wildlife taken under designated hunting rules must be delivered promptly to the recipient. The hunter can accept no compensation for hunting or claim any part of the harvested wildlife for themselves.

In 2002, proposals WP02-04, -05, and -06 were considered within the same analysis. These proposals sought to limit the eligibility of the recipients along with the number of recipients a designated hunter could hunt for in a year. Proposal WP02-10, also considered during this cycle, asked for a prohibition on designated hunting within a portion of Unit 3. The proposals were opposed by the Southeast Alaska

Subsistence Regional Advisory Council (Council). The Federal Subsistence Board (Board) rejected the proposals.

Similar proposals (WP12-02 and WP12-13) were deliberated by the Board during the 2012 regulatory cycle. Both proposals were opposed by the Council. Proposal WP12-02 requested that the designated hunting program be altered statewide to allow designated hunting only for Federally qualified subsistence users that were either over the age of 60 or disabled. It was rejected by the Board due to significant opposition and because it would have a negative effect on those unable to hunt for themselves. Proposal WP12-13 requested to limit the number of Federally qualified recipients for whom a designated hunter can hunt to two in both Unit 1B and Unit 3. It was rejected by the Board because it would have a negligible effect on the number of deer harvested and could have a significant effect on Federally qualified subsistence users unable to hunt for themselves.

Biological Background

The Sitka black-tailed deer is native to the wet coastal rainforests of Southeast Alaska. Deer populations in Alaska are dynamic and fluctuate considerably with the severity of the winters. When winters are mild, deer numbers generally increase. Periodically, however, a severe winter will cause a major decline in the population. Deer have a 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).

There is little information on deer populations in Unit 1B (Lowell 2015). The number of deer harvested has remained consistently low with a slight increase in recent years (**Table 1**) indicating that harvest may not be the primary driver of the population size. According to Lowell (2015), deer populations seem stable in Unit 1B and despite low population densities, there is no reason to restrict harvest. Deer harvest in Unit 3 has been relatively stable while above average in 2015 and 2016 (**Table 1**), possibly reflecting an increased population. Although Unit 3 deer populations are believed to be below carrying capacity (Lowell, 2015) no harvest restrictions are deemed necessary. Both units experienced above average snowfall during winters from 2006-2009 and those harsh winter conditions caused a decline in the deer population. While deer populations remain relatively low in these Units, there are currently no conservation concerns for deer in Units 1B and 3.

Cultural Knowledge and Traditional Practices

The subsistence way of life is a part of the social fabric of Alaskan rural communities. Within Alaska Native cultures, the harvesting of subsistence foods is inextricably intertwined with social interactions. Social interactions may be in the form of extended families spending time at fish camps during the summer, young hunters learning harvesting skills from their older relatives, or individuals sharing their harvest successes with community members. Subsistence includes a cultural value system of sharing, which Alaska Natives have maintained since before contact with Russians and Europeans (Wolfe and Ellana 1983).

The hunting of ungulates in Southeast Alaska is a physically demanding task which not every household in a given community is able to undertake. It is common for able-bodied, younger individuals to take on

the responsibility of harvesting meat for families and individuals outside of their household (i.e. the elderly and single mothers). Deer and moose are vital food staples and an important protein source for many rural Alaskans.

In 1997, the Alaska Department of Fish and Game (ADF&G) Division of Subsistence conducted key respondent interviews in Prince of Wales (POW) Island communities and Ketchikan regarding subsistence deer hunting on POW Island. Hunting and sharing practices are similar throughout most POW Island communities, and it was noted that some hunters regularly supply deer to other households as well as their own (Turek *et. al* 2004). Several individuals mentioned this pattern specifically in their responses. Communities such as Hydaburg, which is predominantly populated by Alaska Natives, had similar answers to the same questions as Pt. Baker and Port Protection whose populations are mostly non-Native. It is anticipated that comparable information would be found if the same study were conducted in communities of Units 1B and 3.

Harvest History

Deer harvest from 2003-2016 in Units 1B and 3 is summarized in **Table 1**. Deer harvest reported on Federal designated hunting permits from Units 1B and 3 is low, particularly in Unit 1B. The maximum number of deer reported harvested in Unit 3 on a Federal designated hunting permit averaged 13 (5-18) from 2010-2016. Federal designated deer harvest in Unit 3 has averaged 15% (10-19%) of the total deer harvest in Unit 3 from 2010-2016. Additionally, from 2010-2016, the average maximum number of recipients hunted for in Unit 3 by a Federal designated hunter was seven (4-11). During that time, no more than two Federal designated hunters harvested deer in Unit 3 for more than five recipients annually.

Table 1. Summary of deer harvested by Federal designated hunters in Units 1B and 3, 2003-2016. Recipient data not available prior to 2010 (USFWS 2017, ADF&G 2017b)

Year	Unit 1B				Unit 3							
	Total reported deer harvest	Federal designated harvest	Percent Federal designated hunter harvest	Total reported deer harvest	Federal designated harvest	Percent Federal designated hunter harvest	Permits used	Max Federal designated hunter harvest	Average harvest for permits used	Max number of recipients	Hunting for more than five recipients	
2003	42	7	17%	833	69	8%	32	6	2.2	-	-	
2004	38	6	16%	890	75	8%	33	13	2.3	-	-	
2005	58	0	0%	730	60	8%	29	14	2.1	-	-	
2006	114	0	0%	644	47	7%	26	4	1.8	-	-	
2007	47	0	0%	516	31	6%	15	5	2.1	-	-	
2008	35	1	3%	371	36	10%	15	8	2.4	-	-	
2009	98	0	0%	585	36	6%	15	6	2.4	-	-	
2010	103	1	1%	665	95	14%	41	12	2.3	6	1	
2011	89	3	3%	525	101	19%	38	17	2.7	8	1	
2012	86	4	5%	536	68	13%	35	10	1.9	6	1	
2013	87	3	3%	473	45	10%	27	5	1.7	4	0	
2014	105	1	1%	514	76	15%	28	16	2.7	11	2	
2015	132	1	1%	723	101	14%	55	12	1.8	6	1	
2016	116	3	3%	787	137	17%	51	18	2.7	9	2	

Effects of the Proposal

If adopted, this proposal would reduce the number of Federally qualified recipients for whom a designated hunter would be able to hunt deer in Units 1B and 3. Adoption of the proposal would have a negative effect on rural residents who are unable to hunt for themselves and depend on deer as a food source. Communities outside of Wrangell would also be affected because this proposal applies to all of Units 1B and 3.

Adopting the proposal is not likely to significantly reduce the total deer harvest within these units, as the reported harvest from Federal designated hunter permits is low. Adopting this proposal would result in an exception to the general designated hunting regulations in these units and would only affect a few hunters who harvest deer for more than five recipients. Because deer populations in Southeast Alaska are predominantly influenced by winter weather conditions, hunting and natural predation, and are managed by seasons and harvest limits, the proposal would have no measurable effect on the deer population. With little or no effect on the deer population, there would be no effect on non-Federally qualified subsistence users. Adopting this proposal would also not address the proponents concern about edible meat not being salvaged as this is addressed through law enforcement.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP18-09.

Justification

There are currently no conservation concerns for deer in Units 1B and 3. Adoption of this proposal would unnecessarily restrict the traditional practice of hunting for others and would needlessly limit the ability of some Federally qualified subsistence users to enjoy the benefits of deer harvested by others. This proposal would also negatively affect Federally qualified subsistence users in other communities outside of Wrangell where no issues have been identified.

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WRITTEN PUBLIC COMMENTS

Fwd: WP 18-09

From: **Max Worhatch IV**
Date: Fri, Aug 4, 2017 at 2:15 PM
Subject: WP 18-09
To: subsistence@fws.gov

Fri, Aug 4, 2017 at 2:22 PM

Federal subsistence board members-

I'm writing today in support of proposal WP18-09. As chairman of the Petersburg advisory committee to the Alaska Department of Fish and Game boards of Fish and Game, I put this very subject on our agenda for discussion for a meeting. It is very concerning to me that in game management units with short seasons and small bag limits set by the state to conserve and manage a sustainable herd are subject to an unrestrained excessively liberal federal designated hunter program. Several years ago, Lindenberg Peninsula hunting opportunities were reduced for deer hunting from two antlered deer and a season from August 1- November 30, to one antlered deer and a season that went from October 15-30. This was result of a proposal to the board of Game brought forward and by the department in recognition of a dramatic drop in the deer population on the peninsula. Some rough winters, heavy hunting pressure due to its close proximity to Petersburg, the fact there is a road system, and high wolf predation were all discussed as being factors in the decline. The federal designated hunter program was also seen as something that had increased, and was also a factor. Our AC unanimously supported the proposal, as we felt it was in the best interest of the resource to curb effort as there was direct evidence of a reduced herd size.

In our AC's discussion about the designated hunter program, it was noted that on Mitkof Island, Lindenberg Peninsula, unit 1B, and Zarembo Island all had relatively small bag limits, and or shorter seasons than most other game units in southeast. Most of this is due to the fact that there are nearby population centers, and many people do not have the time or resources to travel to areas to hunt. Hunting is an activity many people enjoy. Some may only have the resources to hunt on Mitkof Island. If they have a job, they may get to hunt deer 4 days a year. It hardly seems fair that a designated hunter, under this federal program, could hunt for 14 straight days on Mitkof, kill as many as 28 deer for people who won't or can't, while someone who just wants the activity, and a chance to take an animal for the sport and food is marginalized by this program. Robert Larson, former subsistence manager for this program provided information. The amounts reported were in my mind very questionable given the anecdotal information I had talking with hunters who used the program. This led to questions about accurate reporting and follow up as to just how many deer had been taken. It appears to me that there may be a very large discrepancy, which alone should be reason to cause some alarm. If the discrepancy is perceived to be large enough, the state would be justified in closing the season in the areas, which would benefit no one.

Having an unlimited amount of tags for a designated hunter goes far beyond what I think the intent of what this program is supposed to address. It clearly is in conflict with responsible wildlife management. While I will commend the Wrangell AC for submitting this proposal, I do think it is still too liberal. I would rather it be reduced further still, in GMU's 3 and 1b, due to the proximity to Wrangell and Petersburg.

Proposal WP18-09 also calls for accurate reporting and enforcement of the program. A liberal all inclusive program like with little enforcement and follow up will naturally end up getting abused. A classic example is a recent case on the Stikine River where a subsistence fisherman was found to be using twice his allowable gear. Any subsistence program should be closely monitored and accurately reported.

I appreciate your consideration of my comments on what I consider a very serious issue.

Sincerely,

Max Worhatch



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

----- Forwarded message -----
From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–10 Executive Summary

General Description	Proposal WP18-10 requests that the Federal season for moose in Unit 5A, except Nunatak Bench east of the Dangerous River, be open from Sept. 1 – Nov. 15, with Federal public lands closed to the harvest of moose except by residents of Unit 5A from Sept. 1 – Sept. 14. <i>Submitted by: Yakutat Fish and Game Advisory Committee</i>
Proposed Regulation	<p>Unit 5—Moose</p> <p><i>Unit 5A—except Nunatak Bench, west of the Dangerous River— 1 bull by joint State/Federal registration permit only. From Oct. 8 – Oct. 21, Federal public lands will be closed to taking of moose, except by residents of Unit 5A hunting under these regulations</i> <i>Oct. 8- Nov. 15</i></p> <p><i>Unit 5A, except Nunatak Bench, east of the Dangerous River- 1 bull by joint State/Federal registration permit only. From Sept. 1 – Sept. 14, Federal public lands are closed to taking of moose, except by residents of Unit 5A hunting under these regulations.</i> <i>Oct. 8 Sept. 1 – Nov. 15</i></p>
OSM Preliminary Conclusion	Support
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	

WP18–10 Executive Summary	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Oppose

**DRAFT STAFF ANALYSIS
WP18-10**

ISSUES

Proposal WP18-10, submitted by the Yakutat Fish and Game Advisory Committee, requests that the Federal season for moose in Unit 5A, except Nunatak Bench east of the Dangerous River, be open from Sept. 1 – Nov. 15, with Federal public lands closed to the harvest of moose except by residents of Unit 5A from Sept. 1 – Sept. 14.

DISCUSSION

Currently, the area in Unit 5A west of the Dangerous River receives heavy hunting pressure during the first few days of the subsistence season, resulting in a rapid harvest and multiple animals taken out of localized areas. The proponent states that in recent years, the quota has been met and the season closed within about 4-5 days of the opening, and that the area east of the Dangerous River is less accessible and receives less hunting pressure. The proponent claims that by opening up the east side of the Dangerous River earlier, access will be improved for subsistence users (longer days, potentially better weather conditions, and greater availability of local air taxi), allowing additional opportunities and potentially reducing the hunting pressure during the opening days of the subsistence season on the west side.

Implementation of this request would effectively open the Federal season for moose in a portion of Unit 5A five weeks earlier than the existing regulation. The proponent intends to submit a parallel proposal to the Alaska Board of Game (BOG), requesting that the State season open on September 8 on the east side of the Dangerous River.

Existing Federal Regulation

Unit 5A—Moose

Unit 5A— except Nunatak Bench—1 bull by joint State/Federal registration permit only. From Oct. 8 – Oct. 21, Federal public lands will be closed to taking of moose, except by residents of Unit 5A hunting under these regulations

Oct. 8-Nov. 15

Proposed Federal Regulation

Unit 5—Moose

Unit 5A—except Nunatak Bench, west of the Dangerous River— 1 bull Oct. 8-Nov. 15 by joint State/Federal registration permit only. From Oct. 8 – Oct. 21, Federal public lands will be closed to taking of moose, except by residents of Unit 5A hunting under these regulations

Unit 5A, except Nunatak Bench, east of the Dangerous River- 1 bull ~~Oct. 8~~ Sept. 1 – Nov. 15 by joint State/Federal registration permit only. From Sept. 1 – Sept. 14, Federal public lands are closed to taking of moose, except by residents of Unit 5A hunting under these regulations.

Existing State Regulation

Unit 5A—Moose

Unit 5A remainder—One bull by permit, RM061 Oct. 15-Nov. 15 available in person in Douglas or Yakutat beginning Aug. 15

Extent of Federal Public Lands

Federal public lands comprise approximately 97% of Unit 5 and consist of 63% National Park Service (NPS) managed lands, 33% U.S. Forest Service (USFS) managed lands, 1% Bureau of Land Management (BLM) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit 5 Map**). The area east of the Dangerous is comprised almost entirely of Federal public lands, with the exception of 2 Native allotments and a Sealaska Corporation site, all near Cannery Creek west of the Alsek River.

Customary and Traditional Use Determinations

Rural residents of Unit 5A have a customary and traditional use determination for moose in Unit 5A.

Regulatory History

Moose hunting in Unit 5A, except Nunatak Bench, has been managed using a registration permit system since 1978. In 1990, the Federal government began managing subsistence hunting, fishing, and trapping on Alaska's Federal public lands. On October 5, 1990 the Federal Subsistence Board (Board) closed

Federal lands in Unit 5A to moose hunting from Oct. 15–21, except for Yakutat residents (FSB 1990). Additionally, the harvest quota for Unit 5A except the Nunatak Bench was set at 60 bulls, and the quota for the area west of the Dangerous River (**Fig. 1**) was set at 30 bulls. In 1992, the list of communities with a customary and traditional use determination (C&T) was expanded to include all the residents of Unit 5 and not just the residents of Yakutat (P92-012A). The Board used an emergency special action (S92-10) to close the moose season in Unit 5A west of the Dangerous River in 1992 because the harvest quota had been reached.

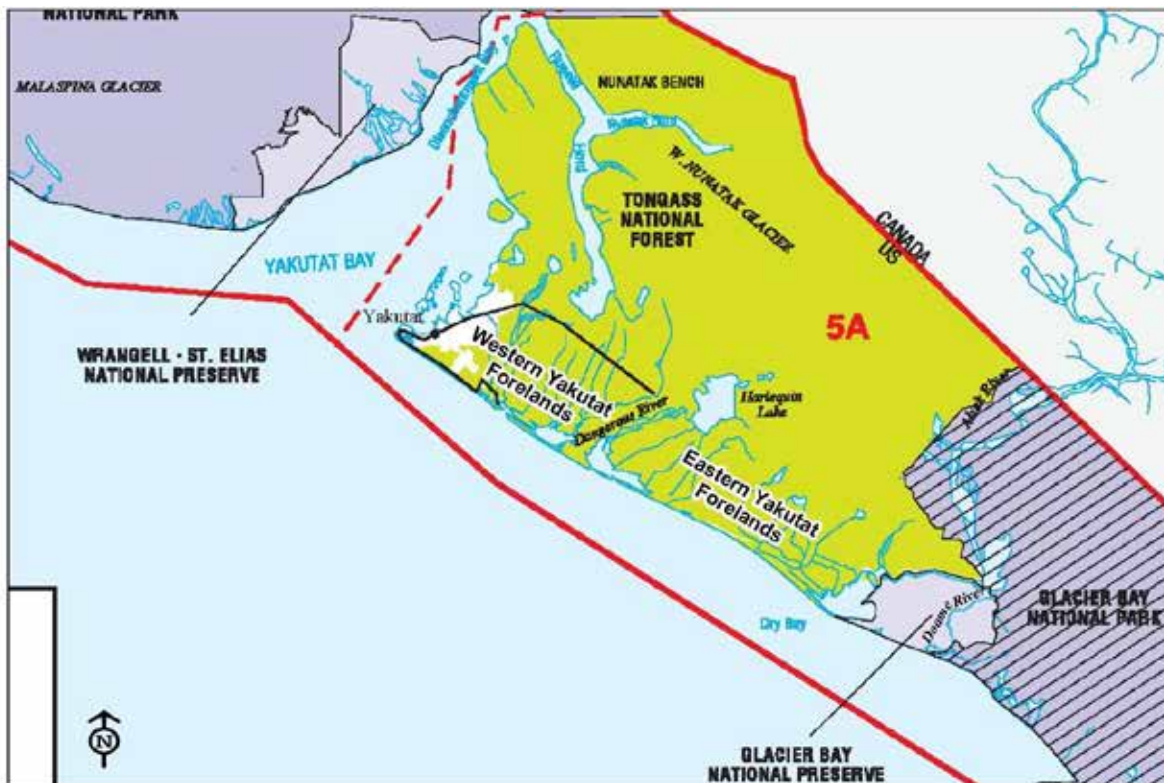


Figure 1. Unit 5A (OSM 2017)

In 1996, to allow for increased opportunity by Federally qualified subsistence users, the Board adopted Proposal P96-014, which extended the Federal season by one week, from a beginning date of October 15 to October 8.

The regulatory dates for the closure of Federal public lands to non-Federally qualified users were changed in 2000 from Oct. 15 – Oct. 21 to October 8 – October 21 (P00-010), to reflect the change in the Federal moose season start date of October 8. In 2004, the Board adopted Proposal WP04-20, which established a joint State/Federal registration permit for subsistence hunting of moose in Unit 5A (RM061), which allowed for more efficient management and harvest monitoring of the hunt. The State issued Emergency Orders in 2004 (01-02-04) and 2007 (01-08-07) to close the portion of Unit 5A west of the Dangerous River when the number of moose harvested reached 28 to prevent the harvest from exceeding the quota of 30 bulls.

In 2008, in response to continued low bull:cow ratios in Unit 5A, the Board approved WSA08-05, which reduced the total harvest quota from 60 to 50 bulls for Unit 5A except the Nunatak Bench and from 30 to 20 bulls for Unit 5A west of Dangerous River. In October 2008, the State issued Emergency Order No. 01-07-08, closing the portion of Unit 5A west of the Dangerous River when the harvest reached 20 bull moose. In 2009, the State raised the harvest quota from 50 to 55 bull moose in Unit 5A except the Nunatak Bench, and the limit for the area west of Dangerous River from 20 to 25 bulls. This change was based on surveys conducted during the winter of 2008, which indicated improved bull:cow ratios.

In 2009, the harvest quota for moose in Unit 5A except the Nunatak Bench was set by the Board at 55 bulls and for Unit 5A west of Dangerous River at 25 bulls, with the same quota established by the State. In 2010, the Board issued a letter of delegation to the Yakutat District Ranger which included the authority to establish the quota for moose in Unit 5A, except Nunatak Bench, and to close the season by local announcement when the quota has been taken.

Since 2010, the Yakutat District Ranger has used the delegated authority to establish the moose harvest quota in the fall for Unit 5A except the Nunatak Bench at 55 bulls, with no more than 25 of those bulls to be taken in the area west of the Dangerous River from October 8 to November 15. The Alaska Department of Fish and Game (ADF&G) also established the yearly moose harvest quota for the State season in Unit 5A remainder, except for Nunatak Bench, at 55 bulls, with no more than 25 bulls to be taken in the area west of the Dangerous River between 2010 and 2016. Since 2012, the season has been closed west of the Dangerous by Special Action (Federal) and Emergency Order (State) before the season end date of November 15 in order to not exceed the quota of 25 bulls.

In 2012, Federal public lands remained closed to hunting moose from Oct. 8 – Oct. 21 due to conservation concerns (WCR12-02), except for residents of Unit 5A. This closure was reviewed again most recently in 2015 (WCR15-02), and the continued closure was supported by the Southeast Alaska Regional Advisory Council (Council) during their winter 2017 meeting.

In 2015, the Council submitted Proposal WP16-06, requesting that a definition of “Nunatak Bench” be added to the Federal subsistence regulations for Unit 5. The Board adopted the proposal and the following definition of Nunatak Bench was added to Federal subsistence regulations: “In Unit 5A, Nunatak Bench is defined as that area east of the Hubbard Glacier, north of Nunatak Fiord, and north and east of the East Nunatak Glacier to the Canadian Border.” 50 CFR 100.26(n)(5)(A); 36 CFR 242.26(n)(5)(A).

In response to rapid harvest and the harvest quota being exceeded in 2014, managers reduced the reporting period for the joint State and Federal moose registration permit for RM061 (Unit 5A, except Nunatak Bench) from 5 days to 3 days, effective starting the 2015 season.

In 2012, lands selected by Sealaska under the Alaska Native Claims Settlement Act near Yakutat (known as “the nine townships”) reverted from State to Federal land management as a result of final land selections, increasing the amount of land available for Unit 5A (Yakutat) residents to hunt between Oct. 8 and Oct. 21. Consequently, little land is available for non-local residents to hunt until Federal lands open under State regulations on October 22nd. This land status change also effectively opened up popular

hunting areas closer to town for local residents a week earlier, helping to distribute hunting pressure during the 1st week of the Federal season. However, some areas within the nine townships are excellent moose habitat, and a significant proportion of the annual harvest comes from those areas because they are productive and easily accessed from the road system. This earlier opening, likely in addition to the recent mild winters and subsequent increasing moose population, has resulted in a very rapid harvest and the need to close the season by special action and emergency order in just 4-5 days. Since 2012, the season west of the Dangerous has been closed by Special Action (Federal) and Emergency Order (State) before the season end date of November 15 in order to not exceed the quota of 25 bulls. The season west of the Dangerous River was closed on: Oct. 24, Oct. 26, Oct. 13, Oct. 13, and Oct. 11, in 2012, 2013, 2014, 2015, and 2016, respectively. From 2014-2016, there was no State season west of the Dangerous River, since the quota was met prior to the opening date.

Subsistence uses, including hunting, are not allowed on Federal public lands in Glacier Bay National Park. *See* 50 CFR 100.3(a); 36 CFR 242.3(a).

Biological Background

Population trends

Moose were first sighted along the lower Alsek River drainage in the eastern section of Unit 5A in the late 1920s and early 1930s. By the 1950s, the moose population had expanded its range westward to the Malaspina Forelands west of Yakutat Bay. The population grew rapidly and by the 1960s was estimated to be over 2,000 animals, which was likely above the carrying capacity of the range (Barten 2006). During the 1960s and early 1970s, the population declined due to both liberal harvest seasons, including cow hunts designed to protect the moose habitat, and severe winters in 1970 and 1972 that reduced the survival and recruitment (Scott 2010).

In 1974, the moose population in Unit 5A was estimated to be approximately 300 animals (FWS 1996). Concern over low population numbers resulted in a hunting closure in Unit 5A from 1974–1977. In 1989, the State developed a management plan for Unit 5A Yakutat Forelands, including the following objectives: 1) to maintain a moose population of 850 animals post-hunt; 2) to sustain an annual harvest of 70 moose; 3) to provide a hunter success rate of 28%, and 4) maintain a post-hunt bull:cow ratio of 20:100. (ADF&G 1990) The population objectives have been updated to an objective of 1,000 animals post hunt (Sell 2014a). Furthermore, the bull:cow ratio of 20:100 should be considered a minimum; State biologists generally manage for a bull:cow ratio of 25:100 in order to ensure adequate breeding and to provide for a maximum sustainable harvest (Scott 2017).

Population counts conducted in the 1970s and 1980s were based on annual winter moose surveys that had been adjusted using a 50% sightability correction factor used to account for animals not seen during the survey (Smith and Franzmann 1979). However, more recent data from a sightability study on the Yakutat Forelands suggest that a 70% sightability correction factor is more appropriate (Oehlers 2007). The 70% correction factor, however, reflects good snow cover, which does not always occur during the population surveys. Ideally, a sightability logistic regression model would include covariates such as snow coverage,

habitat type, and group size in addition to population data so that more accurate annual estimates can be obtained. However, due to variation in survey conditions such as timing, survey routes, number of trained personnel and variable snow conditions, these criteria have not been consistently recorded and so only the raw survey data are used for abundance trend information (Barten 2006, Barten 2008a, Scott 2010). Consequently, results of aerial surveys should be considered a minimum population estimate and used primarily as an index for trend analysis.

Between 2000 and 2016, surveys of the Unit 5A Yakutat Forelands have been conducted annually as conditions permitted (**Table 1**). However, some surveys have been limited to subsections of the forelands with a focus to obtain herd composition data rather than a total population estimate. Because of inconsistent snowfall between years and the surveys timed around sufficient snow cover, surveys often occur after bulls have begun to drop their antlers, resulting in unreliable composition data (Barten 2008). Prior to 2005, surveys were conducted in open areas where concentrations of moose were known to occur. The distribution and movements of moose in addition to the observer's ability to detect moose during aerial surveys are highly variable and dependent on the weather conditions, timing, and amount of snow cover in the late fall. Thus, population counts prior to 2005 may have missed large segments of the moose population and are probably not very reliable for detecting population trends (Barten 2008). In 2005, a more rigorous systematic survey design was developed using line transects which allowed for increased survey coverage, increased reliability of population estimates, reduced bias in the areas selected, and consistency between years.

Table 1. Moose survey results for Unit 5A, 2002-2016 (Barten 2002, 2005, 2006, 2008b; Converse and Rice 2003; Oehlers 2008a, b, c; Oehlers 2012; Scott 2010, 2011a, 2011b, 2013a,b; Sell 2016a, b). Composition surveys emphasize sex and age ratio, rather than a total population estimate.

Month	Year	Survey Area	Composition Survey (Y/N)	# Bulls	# Cows	# Calves	# Unk.	Total	Bull: Cow
March	2002	Yakutat Forelands	Y	28	146	21	0	195	19:100
Dec.	2003	Western Forelands	N	3	23	23	140	189	1
Dec.	2003	Eastern Forelands	N	7	23	25	118	173 ²	1
Nov.	2005	Eastern Forelands	Y	33	166	17	0	216	20:100
Dec.	2005	Western Forelands	N	10	46	47	224	328	3.7:100 ³
Dec.	2005	Eastern Forelands	N	31	25	28	221	305	12.6:100 ³
Nov.	2006	Western Forelands	Y	12	119	11	0	142	10:100
Dec.	2007	Western Forelands	N	24	21	21	200	266	11:100 ³
Dec.	2007	Eastern Forelands	N	55	49	53	262	419	18:100 ³
Nov.	2008	Western Forelands	Y	23	67	4	0	94	34:100
Dec.	2008	Western	Y	24	166	31	0	221	14:100 ³

Month	Year	Survey Area	Composition Survey (Y/N)	# Bulls	# Cows	# Calves	# Unk.	Total	Bull: Cow
		Forelands							
March	2010	Yakutat Forelands	Y	28	146	21	0	195	19:100
Nov.	2011	Western Forelands	Y	28	141	60	0	229	20:100
Dec.	2012	Western Forelands	N	3	12	14	168	197	¹
Oct.	2013	Western Forelands	Y	13	35	4	2	54	37:100
Oct.	2013	Eastern Forelands	Y	12	26	6	0	44	46:100
Dec.	2013	Western Forelands	N	18	36 ⁴	41	117	212	12:100 ³
Dec.	2015	Western Forelands	N	33	43	51	166	293	16:100 ³
Dec.	2015	Eastern Forelands	N	76	85	100	274	535	21:100 ³
Dec.	2016	Western Forelands	N	68	39	43	140	290	38:100 ³
Dec.	2016	Eastern Forelands	N	54	38	44	117	253 ⁵	35:100 ³

¹ survey conducted after bulls starting to drop antlers, no bull: cow ratio estimated

² area between Italo and Akwe rivers not surveyed due to poor conditions

³ minimum estimate

⁴ cows with calves only

⁵ poor survey conditions= some areas not surveyed and total number of moose should be considered a minimum estimate

Following the hunting closures in the mid 1970's and the 1989 management plan, the Yakutat Forelands moose population slowly recovered to a total of approximately 632 and 685 moose in 2005 and 2007, respectively (**Table 1, Fig. 2**). Low bull:cow ratios were observed starting in 2006, particularly on the western forelands (**Table 1**). Following the 2007 survey, there were several severe winters, which likely reduced survival and recruitment and caused a decline in the moose population (Barten 2012). Complete population surveys, however, were not conducted between 2007 and 2014 (surveys during this period focused on sex and age composition). The age composition of bulls in the harvest through 2013 suggests that the range of age classes are well represented in the population and that calf survival is high enough to provide continued harvest of bull moose at current levels (Sell 2014a).

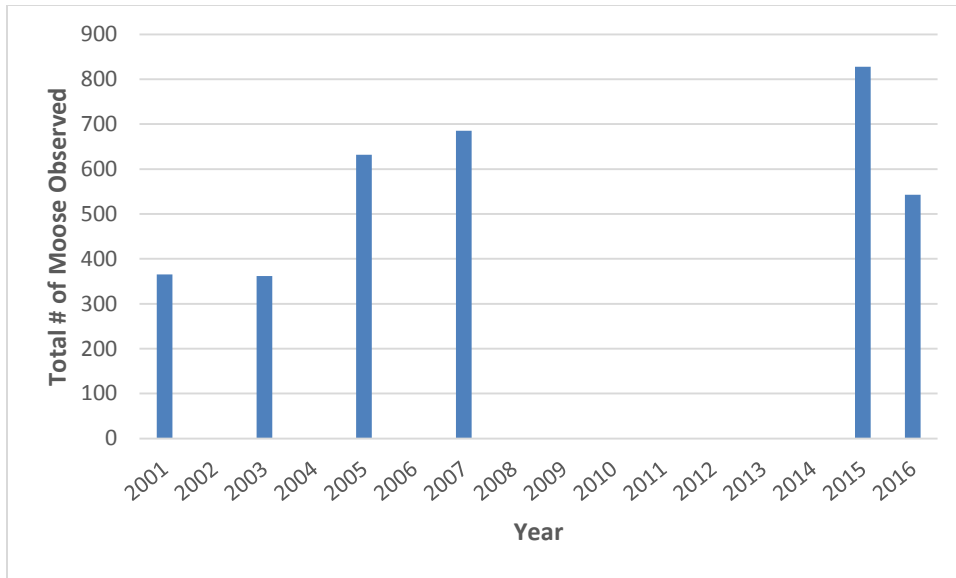


Figure 2. Population estimates for moose in Unit 5A, 2001-2016 (Barten 2004, 2005, 2008b; Converse and Rice 2003, Sell 2015, 2016)

The mild winters of 2014/2015 and 2015/2016 are thought to have resulted in improved over-winter survival for ungulate populations region wide (Scott 2017). In 2015 and 2016, a total of 828 and 543 moose, respectively were observed on the Yakutat Forelands. Although the total number observed was lower in 2016 than 2015, those estimates may be more reflective of survey conditions than actual numbers. Percentage of calves was similar in 2015 and 2016 (18% and 17%, respectively), indicating healthy recruitment. Bull:cow ratios were higher in 2016 (36:100) than 2015 (19:100), meeting the State's management objective of 25 bulls:100 cows during this period. Although the management plan has not been formally updated since 1990, and there are no recent quantitative data on habitat, body condition, twinning rates, etc., an estimate of 800 moose may be a more realistic population goal for Unit 5A (Scott 2017).

Habitat

There have been no recent habitat studies conducted to assess the quality of the moose habitat in Unit 5A. Good body condition and high pregnancy and twinning rates indicate that the quality and quantity of forage habitat was good in the early to mid-2000s (ADF&G 2005, Oehlers 2007). A relatively stable low density population also indicates good quality habitat.

Breeding

Breeding strategies of moose differ between the tundra (Alaska/Yukon-*Alces alces gigas*) and taiga (Eastern, northwestern, and Shira's subspecies-*Alces alces americana*, *Alces alces andersoni*, *Alces alces shirasi*) moose, and there are likely gradations between these 2 strategies (Schwartz 1997). Tundra moose tend to be relatively polygamous breeders and form assemblages during the rut, where dominant males can monopolize females. Consequently, one male can breed with many cows during one breeding

season. In forest dwelling taiga moose, one bull will remain with a single female or small group of females for one or several days, likely breeding with only a few females during rutting season. Moose in Yakutat are likely in a mixing zone between *Alces alces gigas* and *Alces alces andersoni* (Schmidt et al. 2009). If females are not bred during their first estrous cycle, they may experience a recurrent estrous cycle (Schwartz 1997). However, one study in Alaska (Schwartz and Hundertmark 1993) reported that an estimated 88% of calves were conceived during the first estrus.

The breeding season in interior Alaska ranges from September 28-October 12, with calving season approximately mid-May to mid-June, peaking the last 2 weeks of May (Schwartz 1997). Moose in Yakutat have been observed congregating from August-October, coinciding with the rutting season (Oehlers, personal observation). Older prime bulls come into rut earlier than younger bulls and because rutting bulls are more vulnerable to harvest, hunting seasons held during the peak of rut may increase the harvest of prime bulls (Timmerman and Buss 1997). However, in a 1992 survey of 19 moose management jurisdictions, Wilton (1992) found that 74% of 136 moose hunting seasons coincided with the rutting period (September 16-October 15). Currently within Alaska, Federal fall seasons for moose in many units open in September, or even earlier, including a September 1 opening in Units 5B (Malaspina Forelands) and 6C (Cordova area).

Harvest History

The annual moose harvest in Unit 5A ranged from 30-48 during 2002-2011, with an average of 38 (Barten 2004, Sell 2014). Total harvest has ranged from 33-51 from 2012-2016 (**Table 2**). An average of 15 and 27 moose were harvested annually east and west of the Dangerous River, respectively, from 2012-2016. The harvest has exceeded the quota guideline of 25 bulls west of the Dangerous annually since 2012, with the exception of 2013 (**Table 2**). Harvest east of the Dangerous River, however, has not met the quota during this same time period.

Table 2. Harvest of moose west and east of the Dangerous River in Unit 5A 2012-2016 (Schumacher 2017). Designation of Federally qualified subsistence user is based on harvester's community of residence.

Year	Harvest West (% Federally qualified users)	Harvest East (% Federally qualified users)	Total
2012	27(89%)	13 (23%)	40
2013	25 (92%)	8 (50%)	33
2014	28 (100%)	16 (81%)	44
2015	29 (100%)	21 (48%)	51
2016	27 (100%)	17 (59%)	44

Federally qualified subsistence users account for the majority of the harvest west of the Dangerous River (the quota was met before the State season opened from 2014-2016), averaging 96% from 2012-2016 (Schumacher 2017). East of the Dangerous River, Federally qualified users accounted for an average of 52% of the harvest from 2012-2016. The lower percentage of the harvest from Federally qualified users on the east side is primarily due to the limited and costlier access relative to the west side. The west side

receives more pressure in terms of number of hunters, averaging 78 hunters (all users) annually from 2012-2016 versus 44 on the east side. Total number of days hunted is also higher on the west side, averaging 236 days annually versus 178 days on the east side during that same time period. Particularly in recent years, the hunting effort is concentrated during a shorter season on the west side than east. Success rate is similar in both areas; 33% and 35%, respectively, east and west of the Dangerous from 2012-2016, exceeding the State management objective. Hunter effort details are shown in **Table 3**.

Table 3. Hunting effort by all users for moose in Unit 5A 2012-2016 (Schumacher 2017). Numbers are reflective of all hunters who reported at least 1 day of hunting.

Area	Year	Total Number of Hunters	Total Number of Days Hunted	Success Rate	Average # of Days Hunted by Successful hunters	Average # of Days Hunted by all Hunters
West of Dangerous	2012	81	271	33%	2.9	3.3
	2013	89	328	28%	2.2	3.7
	2014	69	171	41%	2.0	2.5
	2015	80	233	36%	2.0	2.9
	2016	72	178	38%	1.3	2.5
East of Dangerous	2012	42	175	31%	2.8	4.2
	2013	30	154	27%	2.6	2.9
	2014	54	200	30%	3.0	3.7
	2015	48	180	44%	3.4	3.8
	2016	47	183	36%	1.8	3.9

Effects of the Proposal

The area east of the Dangerous River is less accessible than the west side, including minimal to no local air taxi service after September. Consequently, this area receives less hunting pressure, particularly from Federal subsistence users, and the harvest quota is not usually met. If this proposal is adopted, access will be improved for subsistence users. An earlier and extended season, more daylight hours, potentially better weather conditions, and greater availability of local air taxi, will result in additional opportunities for subsistence users to harvest moose.

It is difficult to predict the effect that adoption of this proposal would have on hunting patterns. It is likely that many subsistence users would take advantage of the earlier opening on the east side of the Dangerous River. Although access opportunities will be improved, in particular the availability of a local air taxi, this type of transportation is expensive, so many subsistence users may elect to access the area by other means (boat, foot, and ATV), limiting the actual area that most users can reasonably access. Local residents with private planes and commercial fishing cabins would be more likely than others to utilize the more eastern section of this area during this earlier season. Given the high harvest on the west side and interest/demand for moose meat, it is likely that the west side will continue to receive high hunting

pressure and reach the quota; however, some users may opt to put in more effort earlier on the east side, thus reducing the pressure or at least extending the season length on the west side.

Since the harvest quota is not generally met east of the Dangerous River, an earlier (and subsequently longer) season may result in an increase in harvest, potentially meeting the quota and consequently increasing the overall harvest in Unit 5A. If the quota is reached, the season east of the Dangerous River may be closed earlier than November 15th. Harvest west of the Dangerous River is not expected to be impacted by implementation of this proposal.

The proponent intends to submit a parallel proposal to the State Board of Game, requesting that the State season open on September 8 on the east side of the Dangerous River. If both proposals are adopted, the State season would also start approximately 5 weeks earlier on the east side while continuing the 2 week closure to non-Federally qualified users on Federal lands (Unit 5A east of the Dangerous is composed almost entirely of Federal lands). State regulations for the west side of the Dangerous River would remain the same. Consequently, there would be no negative impacts to State users and would also provide them additional opportunities, including the availability of local air taxi service. If, however, this proposal is passed and a parallel extension is not implemented under State regulations, subsistence users will enjoy an earlier season opening whereas the State season will remain the same; consequently, fewer moose may be available to State users.

Biologically, since the harvest is managed on a quota, there would be minimal effects to the overall moose population. However, bulls would be harvested earlier than they are currently, coinciding more closely with the pre-rut and rutting season. Fall moose seasons within Alaska, including southcentral Alaska, include September opening dates, and are sustainable (Scott 2017). Because movement patterns of bulls throughout the Yakutat Forelands and specifically across the Dangerous River are largely unknown, effects of a potential increased harvest east of the Dangerous River on the population on the west side are difficult to predict. Given limited access, a currently healthy moose population, and a limited quota, effects to the population are expected to be minimal.

OSM PRELIMINARY CONCLUSION

Support Proposal WP18-10.

Justification

Currently, the area in Unit 5A west of the Dangerous River receives heavy hunting pressure during the first few days of the subsistence season, resulting in a rapid harvest and multiple animals taken out of localized areas. The area east of the Dangerous River is less accessible than the west side, including minimal to no local air taxi service after September, and receives less hunting pressure. Opening the Federal season on the east side of the Dangerous River earlier will improve access, allowing additional opportunities for subsistence users and potentially reducing the hunting pressure, or at least lengthening the season, west of the Dangerous River.

Since the harvest is managed on a quota which is set annually, there would be minimal effects to the overall moose population. A season opening in September is consistent with other seasons in southcentral Alaska. Given limited access, a currently healthy moose population, and a limited quota, effects to reproduction are expected to be minimal. Consequently, there are not expected to be any conservation concerns as a result of adoption of the proposal.

The proponent intends to submit a parallel proposal to the State Board of Game, requesting that the State season open on September 8 on the east side of the Dangerous River. Consequently, if both proposals are passed, there would be no negative impacts to State users and it would also provide them additional opportunities, including the availability of local air taxi service.

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WRITTEN PUBLIC COMMENTS



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov>

Mon, Jul 17, 2017 at 10:39 AM

To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>

Date: Fri, Jul 14, 2017 at 8:01 AM

Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska

To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–11 Executive Summary	
General Description	<p>Proposal WP18–11 requests that the Federal Subsistence Board (Board) provide a Federal priority for moose in Unit 1C Berners Bay for rural residents, or close Federal lands to the harvest of moose in 1C Berners Bay to all users, or clearly state on the record why a priority for moose should not be provided to rural residents on the Federal public lands of Berners Bay. <i>Submitted by: Calvin Casipit of Gustavus</i></p>
Proposed Regulation	<p>Unit 1C - Moose</p> <p><i>Unit 1C — Berners Bay drainages — 1 bull by Federal drawing permit</i> <i>Sept. 15–Oct. 15 No Federal open season</i></p> <p><i>Unit 1C — Berners Bay drainages — 1 antlerless moose by Federal drawing permit.</i> <i>Sept. 15–Oct. 15</i></p>
OSM Preliminary Conclusion	<p>Support Proposal WP18-11 with modification. The modification establishes a may-be-announced cow season and closes Federal public lands to all but Federally qualified subsistence users. The modified regulation should read:</p> <p>Unit 1C - Moose</p> <p><i>Unit 1C — Berners Bay drainages — 1 bull by Federal drawing permit</i> <i>Sept. 15–Oct. 15–No Federal open season</i></p> <p><i>Unit 1C — Berners Bay drainages — 1 antlerless moose by Federal drawing permit.</i> <i>May be announced Sept. 15–Oct. 15</i></p> <p><i>Federal public lands are closed to the harvest of moose except by Federally qualified subsistence users.</i></p>

WP18–11 Executive Summary	
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	

WP18–11 Executive Summary	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	3 Oppose

**DRAFT STAFF ANALYSIS
WP18-11**

ISSUES

Proposal WP18-11, submitted by Calvin Casipit of Gustavus, requests establishment of a Federal season and harvest limit for moose in the Berners Bay drainages.

DISCUSSION

The proponent requests that the Federal Subsistence Board (Board) provide a Federal priority for moose in Unit 1C Berners Bay for rural residents, or close Federal lands to the harvest of moose in 1C Berners Bay to all users, or clearly state on the record why a priority for moose should not be provided to rural residents on the Federal public lands of Berners Bay.

Existing Federal Regulation

Unit 1C - Moose

Unit 1C - Berners Bay drainages.

No Federal open season

Proposed Federal Regulation

Unit 1C - Moose

Unit 1C — Berners Bay drainages — 1 bull by Federal drawing permit

Sept. 15-Oct. 15~~*No Federal open season*~~

Unit 1C — Berners Bay drainages — 1 antlerless moose by Federal drawing permit.

Sept. 15–Oct. 15

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

Federal public lands comprise approximately 95% of Unit 1C and consist of 62% U.S. Forest Service (USFS) managed lands and 33% National Park Service (NPS) managed lands (**see Unit 1C Map**).

Federal public lands comprise approximately 97% of Berners Bay drainages and consists 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 the Berners Bay drainages.

Regulatory History

Harvest regulations for moose in Unit 1C, 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. The Alaska Department of Fish and Game (ADF&G) began issuing draw permits again in 2014 when five bull permits were issued. Five permits were issued for bulls again in 2015 and 2016.

Table 1. State of Alaska and Federal moose hunting regulations for Unit 1C, Berners Bay drainages, since 1959. (Updated from Schroeder 2005, pers. comm.; 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
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
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

Year	Season	Season	Limit	Conditions and Limitations
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
1991-2016	Federal Subsistence	No open season	-	Berners Bay drainages

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.

There has never been a Federal season for moose in Berners Bay as the State season was never adopted at the beginning of the Federal Subsistence Management Program. When the Alaska Board of Game considered making a customary and traditional use determination for moose in the Berners Bay drainages, it concluded that there was no customary and traditional use of the introduced moose population. Proposal WP02-14 requested establishment of a Federal season 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.

Biological Background

Berners Bay moose are an introduced population in a small, geographically isolated location. Fifteen moose calves from the Matanuska and Susitna Valleys were released in Berners Bay in 1958, and a supplemental release of 6 more calves occurred in 1960. This introduction was a cooperative effort by ADF&G, USFWS and Territorial Sportsmen, 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 has 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 1990-2016 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 2006-2011 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 2006-2016 (White and Barten 2009, Sell 2017, pers. comm.).

Survey Year	Survey Date	Total Moose Seen	Total Marked 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

Table 3. Survey data for the Berners Bay moose herd 1990-2016 (White and Barten 2009; Sell 2017, pers. comm.).

Survey Year	Survey Date	Bulls	Cows	Calves	Unknown	Total moose	Count time (hrs)	Bulls per 100F	Calves per 100F	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	5	5	36	46	---	---	---	12	---

Survey Year	Survey Date	Bulls	Cows	Calves	Unknown	Total moose	Count time (hrs)	Bulls per 100F	Calves per 100F	Calves % in herd	Moose per hour
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	41	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	9	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

Harvest History

The first limited moose hunting season in Berners Bay was held in 1963, when 4 bulls were harvested. Since that time, the annual harvest ranged from 0 to 23 animals (Sell 2014). **Table 4** shows the numbers of draw permits issued and moose harvested from 1983 through 2016. The number of permits issued remained steady 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, access to 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.

Table 4. Number of permits issued and moose harvested in Unit 1C, Berners Bay 1983 through 2016 (ADF&G 2017a, 2017b; Sell 2017 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
2004	8	0	8	6	0	0	6
2005	8	0	8	5	0	0	5

Year	Permits			Harvest			
	Bulls	Cows	Total	Bulls	Cows	Unknown	Total
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

Table 5 shows the Berners Bay moose harvest by community of residence for 1990 through 2016. **Tables 6 and 7** show the community of residence of applicants for the Berners Bay bull (hunt DM041) and antlerless (hunt DM042) harvest permits from 1993 through 2016. 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 appears to be greater than the number of permits available annually.

Table 5. Residency of successful hunters in the Berners Bay portion of Unit 1C (State hunts DM041 and DM042), from 1990 through 2016 (ADF&G 2017c).

Year	Residency											Total											
	Anchorage	Angoon	Auke Bay	Douglas	Fairbanks	Haines	Juneau	Nome	Petersburg	Sitka	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									15
1999			2	2		1						10											15
2000			2	1	1							10		1									15
2001	1		3	1								7		1									13
2002				2								6											9
2003		1	1	1								5											8
2004				1								5											6
2005												5											5
2006			1									6											7
2007																							0
2008																							0
2009																							0
2010																							0
2011																							0
2012																							0
2013																							0
2014			1									3											4
2015				2								2											4
2016												4											4
Total	2	1	12	11	1	6	159	1	3	2	1	199	3	2	1	1	1	1	1	1	1	199	

Table 6. 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.). Only communities proposed for a positive customary and traditional use determination are individually labeled.

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					Hunt closed						
2009					Hunt closed						
2010					Hunt closed						
2011					Hunt closed						
2012					Hunt closed						
2013					Hunt closed						
2014			13		3	492	4				3%
2015		1	3			584					1%
2016			4		2	711					1%

Table 7. 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). Only communities proposed for a positive customary and traditional use determination are individually labeled.

Year	Community									
	Excursion Inlet	Gustavus	Haines	Klukwan	Skagway	Other	Unknown	Percent Federally qualified applicants		
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						No antlerless quota				
2005						No antlerless quota				
2006		1	11		1	342				4%
2007						No antlerless quota				
2008						No antlerless quota				
2009						No antlerless quota				
2010						No antlerless quota				
2011						No antlerless quota				
2012						No antlerless quota				
2013						No antlerless quota				
2014						No antlerless quota				
2015						No antlerless quota				
2016						No antlerless quota				

Other Alternative(s) Considered

Instead of a draw hunt, an allocation based on an analysis pursuant to Section 804 of the Alaska National Interest Lands Conservation Act (ANILCA) could be determined to limit the number of eligible Federally qualified subsistence users. However, this option may not result in a reduced pool of eligible hunters since the eligible rural communities are similarly situated.

Establishing a may-be-announced draw hunt for cow moose would provide managers flexibility to manage for the desired bull:cow ratio. A cow moose hunt would only be initiated at appropriate population levels and sex ratios.

Effects of the Proposal

Establishing a Federal season for moose in Berners Bay drainages in Unit 1C would provide additional opportunity for Federally qualified subsistence users to harvest animals on Federal public lands. However, the demand for Berners Bay moose by Federally qualified subsistence users consistently outweighs the harvestable supply. The moose population in this area is small and vulnerable, even at optimal population levels, and the harvest of even a few extra moose could result in a conservation concern.

Residents of Juneau have been the primary harvesters of Berners Bay moose since the inception of a hunting season. Allocating all available moose to Federally qualified subsistence users would have a negative effect on non-Federally qualified users.

OSM PRELIMINARY CONCLUSION

Support Proposal WP18-11 **with modification** to close Federal public lands in Unit 1C Berners Bay drainages to all but Federally qualified subsistence users and establish a may-be-announced antlerless season.

The modified regulation should read:

Unit 1C - Moose

Unit 1C — Berners Bay drainages — 1 bull by Federal drawing permit *Sept. 15-Oct. 15*
~~*No Federal open*~~
season

Unit 1C — Berners Bay drainages — 1 antlerless moose by Federal drawing permit. *May be announced Sept. 15-Oct. 15*

Federal public lands are closed to the harvest of moose except by Federally qualified subsistence users.

Justification

Section 802 of ANILCA requires the conservation of healthy wildlife populations, meaning that wildlife are managed in a way that “minimizes the likelihood of irreversible or long-term adverse effects upon such populations and species.” 50 CFR 100.4; 36 CFR 242.4. Section 802 also requires that subsistence uses by rural residents of Alaska shall be “the priority consumptive uses of all such resources on the public lands of Alaska.” Further, Section 804 provides a preference for subsistence uses, specifically “...the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes”. Section 815 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.”

Establishing a Federal season in Berners Bay drainages in Unit 1C would provide additional opportunity for Federally qualified subsistence users to harvest moose on Federal public lands. Providing this opportunity for subsistence harvest of moose is consistent with Section 802 of ANILCA Title VIII. Despite that mandate in Section 802, the Federally qualified subsistence users residing in Units 1-5 have not been provided a Federal opportunity to hunt moose in Berners Bay during a period of over 30 years where it has been authorized under State regulations. 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. Due to the small size of the population and habitat limitations in the Berners Bay drainages it is not likely that the population could support additional harvest that may result from adding Federally qualified subsistence users to the hunting pool. Thus, in order to meet the mandates of Section 802 – providing subsistence opportunity while managing for a healthy moose population – a closure is required.

Demand for moose in Berners Bay drainages from Federally qualified subsistence users alone is consistently greater than the harvestable surplus. Establishing a Federal draw hunt would prevent overharvest while giving preference to Federally qualified subsistence users. Establishing a may-be-announced draw hunt for cow moose would provide managers flexibility to manage for the desired bull:cow ratio.

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WRITTEN PUBLIC COMMENTS

**TERRITORIAL SPORTSMEN, INC.
P. O. BOX 32712
JUNEAU, AK 99803**

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

July 18, 2017

Re: Comments by Territorial Sportsmen, Inc. on Federal Regulatory proposal WP18-11

Dear Mr. Matuskowitz and members of the Federal Subsistence Board:

The proponent of proposal WP18-11 asks that one of three options be adopted for subsistence taking of moose in Berners Bay, within Unit 1C: (1) provide a federal priority to rural residents to harvest moose in Berners Bay; (2) close federal lands to moose harvesting in Berners Bay; or (3) clearly state on the record why a priority for moose should not be provided to rural residents on the federal public lands of Berners Bay.

Of these 3 options, the Territorial Sportsmen, Inc. (TSI) supports the proponent's third option, and offers rationale for why a priority for moose should not be provided to rural residents on federal public lands of Berners Bay.

TSI was founded in 1946 and has remained active in fish and wildlife conservation since that time. Among its activities, TSI actively promotes access to public lands, builds cabins on state and federal lands for all members of the public to use and enjoy, and provides scholarships to high school graduates pursuing college educations. Moreover, in 1958 TSI worked cooperatively with the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and the military to capture and transport moose calves to Juneau for release in Berners Bay (Nelson 1959). An Air Force helicopter was used to capture calves in the Susitna and Matanuska valleys in May 1958.

Seventeen calves were transported to Juneau in an Air National Guard DC-3 to be reared for 2 ½ months at the Minfield Childrens' Home at Lena Point (Paul 2009). The rearing process was successful and 16 of the original 17 calves (5 males and 11 females) were released at Berners

Page 1 of 3

Bay on 15 August 1958. The calves were transported to Berners Bay in a landing craft. One calf subsequently died (The Daily Alaska Empire 1958).

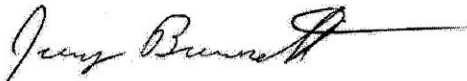
In 1960, 11 additional moose calves were captured and shipped by the Alaska Department of Fish and Game to Juneau for subsequent release at Berners Bay (Merriam 1960). The rearing process was not as successful as in 1958 and only 6 calves survived to be released on 24 August.

Three cows with calves observed in June 1960 demonstrated the early reproductive success achieved by the animals transplanted in 1958 to Berners Bay (Merriam 1960). Because of the excellent initial reproduction, a limited open season on bull moose was established in 1963, just 5 years after the transplant. The first two years, 10 bulls were harvested and for the next decade yearly harvests ranged from 5 to 23 animals. Either sex hunts were initiated in 1971 to help maintain a balanced sex ratio in the herd. In 1971, 50 permit holders harvested 23 moose at Berners Bay and in 1972 the same number of permittees harvested 22 moose. Drawing permits were implemented in 1978. Twelve bulls were taken that year and in that year's aerial surveys, a record 120 moose were counted. After that, the number of permits issued annually ranged from as many as 20 in the late 1970s and early 1980s to as few as 5 bulls per year during 1987-1990. In recent years, 5 drawing permits have been issued for bull harvests.

The Berners Bay transplant was quite successful. It established a moose population in an area that, because of its geographic isolation, may not have been colonized by moose naturally for many years, if ever. That introduced population, aided by attentive management, has provided an extremely popular hunt for over 50 years to all Alaskans as well as hunters from other states.

Given the fact that there was not a historical moose population in Berners Bay, with no accompanying customary and traditional uses of moose, and given further that the existing moose population at Berners Bay is the result of government and private efforts, TSI believes the herd should remain available to all hunters. This belief is further supported by the fact that Pittman-Robertson (P-R) funds and state hunting license fees were used to pay for the transplant. P-R funds come from an 11% excise tax on all firearms and ammunition purchased in the United States. State hunting license fees are generated from all who purchase a hunting license in Alaska, residents and nonresidents, alike.

Sincerely,



Jerry Burnett
President, Territorial Sportsmen, Inc.

cc: TSI Board of Directors

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Fwd: WP18-11 Comment

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

Wed, Aug 2, 2017 at 7:56 AM

From: **Nicholas Orr**

Date: Wed, Aug 2, 2017 at 7:43 AM

Subject: WP18-11 Comment

To: "subsistence@fws.gov" <subsistence@fws.gov>

There should be no federal subsistence preference for moose in Berners Bay.

(1) The population is quite small and sustains only a limited harvest via a state tag drawing system. It is a tag in very high demand and removing this population from state management would deprive the state of thousands of dollars on an annual basis from lost drawing tag revenue.

(2) It is not located near any rural communities; rather it is much more accessible to Juneau residents.

(3) The moose population there was transplanted for increased recreational opportunities; there is a long tradition of recreational hunting. That tradition should continue and the original intent of the transplant should be honored.

Thanks

Nicholas Orr



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–12 Executive Summary	
General Description	Proposal WP18-12 requests to add residents of the community of Gustavus to the customary and traditional use determination for mountain goat in Unit 1C. <i>Submitted by: Calvin Casipit.</i>
Proposed Regulation	<i>Customary and Traditional Use Determination – Goat</i> <i>Unit 1 C Residents of Haines, Kake, Klukwan, Petersburg, and Hoonah, and Gustavus</i>
OSM Preliminary Conclusion	Support
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	

WP18–12 Executive Summary	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	2 Oppose

**DRAFT STAFF ANALYSIS
WP18-12**

ISSUES

Proposal WP18-12, submitted by Calvin Casipit, requests to add residents of the community of Gustavus to the customary and traditional use determination for mountain goat in Unit 1C (**Figure 1**).

DISCUSSION

The proponent states that customary and traditional use determination for mountain goat in Unit 1C extend to residents in Units 1D and 4, yet Gustavus residents reside in 1C and do not have a customary and traditional use determination.

The Southeast Alaska Subsistence Regional Advisory Council (Council) has been working to improve customary and traditional use determinations for its region. Under the approach it prefers, 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 Alaska National Interest Lands Conservation Act (ANILCA) Section 804 procedures can be used to allocate scarce resources.

A significant factor affecting hunting effort in the Southeast Region is the heavily populated Juneau road system (31,000 people), and Ketchikan road system (13,500 people) (ADLWD 2017). People living in these areas are nonrural residents of Alaska under Federal Subsistence Management Program regulations. Juneau and Ketchikan residents are not eligible to harvest fish and wildlife under Federal subsistence regulations, and the proposed customary and traditional use determination will not apply to Juneau or Ketchikan residents that only seasonally reside in Gustavus. Additionally, Glacier Bay National Park constitutes one quarter to one third of the land mass in each of Units 1C, 1D, and 5A. These Federal public lands within the park are closed to all hunting, and wildlife management in the park is not in the Federal Subsistence Board's (Board's) jurisdiction.

The customary and traditional uses of mountain goat by residents of Gustavus have not yet been recognized by the Board. Consequently, the focus of this analysis is expanding the existing customary and traditional use determination for mountain goats in Unit 1C, to include Gustavus.

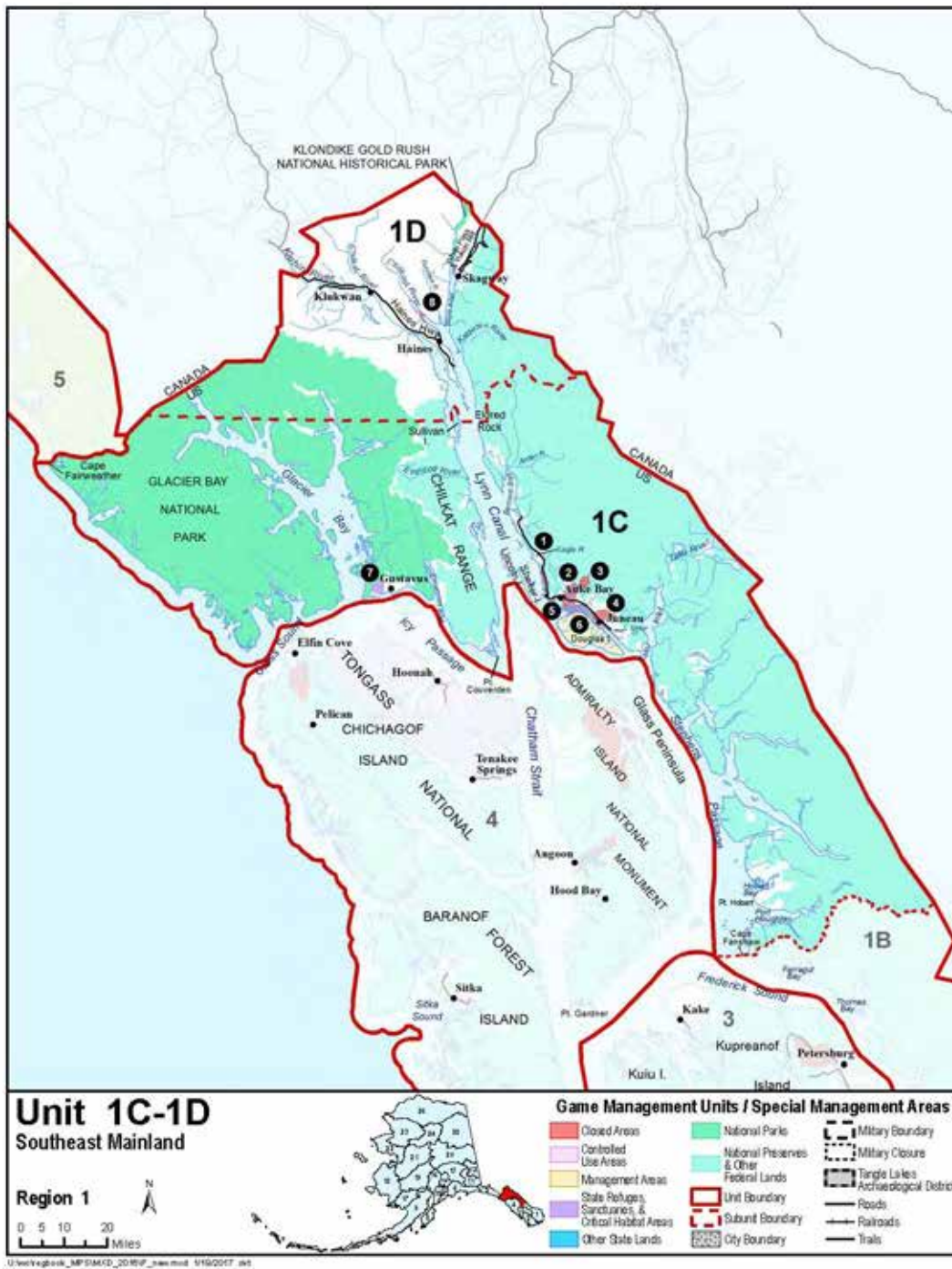


Figure 1. Boundary of Units 1C & 1D (ADFG 2017a). Map numbers within black ovals represent 1) Juneau Road system closed area, 2) Mendenhall Lake Closed Area, 3) Mt. Bullard Closed Area, 4) Mt. Juneau Closed Area, 5) Mendenhall Wetlands State Game Refuge, 6) Douglas Management Area, 7) Dude Creek Critical Habitat Area, and 7) Lutak Road Closed Area.

Existing Federal Regulation

Customary and Traditional Use Determination—Goat

Unit 1C Residents of Haines, Kake, Klukwan, Petersburg, and Hoonah

Proposed Federal Regulation

Customary and Traditional Use Determination—Goat

Unit 1C Residents of Haines, Kake, Klukwan, Petersburg, ~~and~~ Hoonah, **and Gustavus**

Extent of Federal Public Lands

Federal public lands comprise approximately 95.5% of Unit 1C and consist of 62.6% U.S. Forest Service (USFS) managed lands and 32.9% National Park Service (NPS) managed lands (see **Figure 1**).

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 determination in Unit 1C (72 CFR 22961; May 29, 1992). The customary and traditional use determination that was adopted for goats in Unit 1C included residents of Haines, Klukwan, and Hoonah.

The Board has adopted only one change since 1992 (36 CFR 242; June 29, 1998). In 1998, the Board adopted Proposals P98-07 and P98-08 with modification and added residents of Kake and Petersburg to the customary and traditional use determination for mountain goats in Unit 1C. The Interagency Staff Committee said in its justification for the proposals,

The recommendation is supportive of the proposal and the Regional Council recommendation. It provides for an expansion of the existing C&T determination based on documented use. The traditional use and ownership area of several Tlingit groups overlap in Unit 1C, with traditional use of the unit by at least the Chilkat, Hoonah, and Kake Tlingits. Contemporary residents of Kake and Petersburg are descended from and are the current members of these groups showing long term traditional use patterns within Unit 1C. In addition, the two communities should be included in the C&T use determination because they have an active record of harvest of goat in the unit. The rationale for extending the positive C&T for these communities to Unit 1C as a whole rather than to a part of it is for regulatory simplicity (FWS 1998:77).

The Board's stated policy is to defer to the recommendations of Regional Advisory Councils on customary and traditional use determinations (FSB 2012). Additionally, the Board can adopt Council recommendations on determinations that include entire management units or entire management areas when residents of a community have demonstrated taking fish or wildlife in a portion of a management unit or management area.

The current customary and traditional use determination for mountain goat in Unit 1C includes the residents of Haines, Kake, Klukwan, Petersburg, and Hoonah. Gustavus does not currently have a customary and traditional use determination for goat in any unit specifically, though within Unit 1A and 1D there is a customary and traditional use determination for all rural residents.

Community Characteristics

Gustavus is located on the north shore of Icy Passage at the mouth of the Salmon River in the St. Elias Mountains (ADC 2017). It is approximately 48 air miles northwest of Juneau and is surrounded by Glacier Bay National Park and Preserve to the north, east, and west, and Icy Passage to the south (ADC 2017). The community is situated within Unit 1C.

At the time of the 2010 census, a total of 442 year-round residents were documented in Gustavus, representing 212 households. The mean age of community residents is 50 years old (ADC 2017). The demographics of Gustavus include both Native and non-Native households (ADC 2017). During the summer months there are up to three times the number of residents engaged in seasonal employment and recreational activities than in other months (ADLWD 2017).

Historically, the Gustavus area was used by the Tlingit people for seasonal harvesting and processing of subsistence resources (NPS 2017). It is within the traditional territory of the Hoonah (Xunaa) Kwaan (ANKN 2017). Western settlers became established at the Gustavus site as early as 1917 and the first successful homestead patent was issued in 1923 (NPS 2017). Early settlers called the town Strawberry Point, but the U.S. Postal Service renamed the town Gustavus in 1925 when they first established an office there (NPS 2017). In the same year, Glacier Bay National Monument, which includes Gustavus, was established by President Calvin Coolidge (ADC 2017). Homesteaders appealed the inclusion of Gustavus in the monument for many years and it was excluded when the monument became Glacier Bay National Park in 1980 when ANILCA was passed (ADC 2017). The city became incorporated on April 1, 2004 (ADC 2017).

The landscapes surrounding Gustavus are relatively flat due to rapid glacial retreat. Captain George Vancouver visited nearby Icy Strait in 1794 and described Glacier Bay as being completely covered by the Grand Pacific Glacier (ADC 2017). By 1894 the glacier had retreated 40 miles and by 1916, 65 miles (ADC 2017). A spruce-hemlock forest developed on the lands that were previously described by Vancouver as being glaciated (ADC 2017).

Eight Factors for Determining Customary and Traditional Use

A community or area's customary and traditional use is generally exemplified through the eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking; near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use 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.

Specific information on each of the eight factors is not required because a community or area seeking a customary and traditional use determination only has to "generally exhibit" the eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)).

There is a long term, consistent pattern of use of mountain goat in Unit 1C by residents of Gustavus. The contemporary permanent occupation of Gustavus was settled primarily by non-Native homesteaders who have continued a pattern of historic use of mountain goat in Unit 1C. Today, the community is composed of both Native and non-Native households. The ADF&G Division of Subsistence conducted subsistence harvest surveys in Gustavus in 1987 and found that 4% of households were using mountain goat in that year and that all of them received the resource from other households (ADF&G 2017b). Between 1980 and 1997, at least 13 residents of Gustavus hunted for mountain goat in Unit 1C, and at least 4 were successful (OSM 1998). More recently between 2014 and 2016, seven Gustavus households reported hunting for mountain goat in Unit 1C; four were successful (ADFG 2017c).

Unit 1C is located primarily within the boundaries of the traditional lands used by the Auke Bay Tribe (Aak'w Kwaan), the Taku Tribe (T'aa ku Kwaan), and the Hoonah Tribe (Xunaa Kwaan; ANKN 2017). The Kake Tribe (Keex' Kwaan) also had permanent and seasonal settlements in the southern portion of the

Unit on the mainland (Firman and Bosworth 1990). The use of mountain goat in Unit 1C by these tribes is well documented in ethnographic literature (see ADF&G 1992). The Hoonah Tlingit harvested goat historically in Glacier Bay and Dundas Bay (Goldschmidt and Haas 1946) and near Excursion Inlet (Schroeder and Kookesh 1990).

The residents of Southeast Alaska have used mountain goat continuously throughout recorded history wherever goat has been found. The mountain goat, found in rocky terrain from the Gulf of Alaska to the Cascade Range of Washington State, 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. This means of harvest exhibits 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 streams 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 the 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). The wool is used to weave ceremonial blankets, each blanket requiring the wool of approximately three goats and taking 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). The wool of the goat 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. These were used for food and 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 (Oberge 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 airplanes to reach goat hunting areas (ADFG 2017a). Between 2011 and 2013, approximately 82% of successful mountain goat hunters in Unit 1C used boats as their mode of transportation (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 or persons***. 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 traded, bartered and shared within and among the communities of Kake and Petersburg, as well as other communities which have used Unit 1C to harvest goat (OSM 1998). ADF&G Division of Subsistence surveys in 1987 showed that while Gustavus residents did not harvest goats in that year, several individuals used goat that they received from elsewhere (ADFG 2017b).

As in all communities in Southeast Alaska, the harvest and use of a broad range of subsistence caught foods in Gustavus is high, demonstrating ***a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area which provides substantial cultural, economic, social, and nutritional elements to the community***. The 1987 ADF&G Division of Subsistence surveys documented that in the study year, 100% of households in Gustavus harvested and used wild resources; residents harvested approximately 241 lbs. of subsistence foods per capita (OSM 1998; ADF&G 2017b). Approximately 90% of households gave subsistence foods to other households and an equal percentage received subsistence foods from other households.

The customary and traditional use determinations for other large game species in Unit 1C can provide additional insights on which residents generally exhibit the eight factors used in the determination for mountain goat, using these other species as proxies. Gustavus residents currently have a customary and traditional use determination for deer, black bear, and moose in Unit 1C.

Effects of the Proposal

If this proposal is adopted, those eligible to hunt mountain goats under Federal subsistence regulations in Unit 1C would *increase*, adding residents of Gustavus to the customary and traditional use determination for mountain goat. A customary and traditional determination would increase resident opportunity in the event that State seasons or harvest limits are reduced or closed, it would allow them to continue hunting

mountain goats in the event that the species is closed to non-Federally qualified users on Federal public lands, and allow them to be considered in the event of Federal prioritization among Federally qualified subsistence users in Unit 1C.

If this proposal is not adopted, there would continue to be no priority for Gustavus residents to hunt mountain goat in Units 1C under Federal regulations. The priority for mountain goat hunting in Unit 1C would continue to include residents of Haines, Kake, Klukwan, Petersburg, and Hoonah.

OSM Preliminary Conclusion

Support Proposal WP18-12.

Justification

Based on a review of the eight factors, rural residents of Gustavus have demonstrated customary and traditional use of mountain goat within Unit 1C. According to ethnographic descriptions and harvest documentation supporting such a finding, residents of Gustavus customarily and traditionally used this resource, and continue to do so.

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WRITTEN PUBLIC COMMENTS



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: WP18-12

AK Subsistence, FW7 <subsistence@fws.gov> Wed, Aug 2, 2017 at 8:55 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

----- Forwarded message -----
From: **Nicholas Orr** <nicholasporr@yahoo.com>
Date: Wed, Aug 2, 2017 at 7:52 AM
Subject: WP18-12
To: "subsistence@fws.gov" <subsistence@fws.gov>

There should be no customary and traditional (CT) use for mountain goats for Gustavus residents because there has been no CT use of mountain goats in Gustavus. The town is only slightly more than 100 years old and as such lacks the 'customary' and 'traditional' parts of the CT designation. Other communities such as Hoonah and Angoon have existed for thousands of years and as such *do* meet the 'customary' and 'traditional' portions of the CT designation. This looks to be an attempt by an individual to shoot mountain goats without regard for season.



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov>

Mon, Jul 17, 2017 at 10:39 AM

To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>

Date: Fri, Jul 14, 2017 at 8:01 AM

Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska

To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–13 Executive Summary	
General Description	Proposal WP18–13 requests removing the requirement that traps and snares be marked with trapper identification in Southeast Alaska (Units 1-5). <i>Submitted by: Michael Douville of Craig</i>
Proposed Regulation	<p>Units 1-5—Trapping (Special Provisions)</p> <p><i>Trappers are prohibited from using a trap or snare unless the trap or snare has been individually marked with a permanent metal tag upon which is stamped or permanently etched the trapper's name and address, or the trapper's permanent identification number, or is set within 50 yards of a sign that lists the trapper's name and address, or the trapper's permanent identification number. The trapper must use the trapper's Alaska driver's license number or State identification card number as the required permanent identification number. If a trapper chooses to place a sign at a snaring site rather than tagging individual snares, the sign must be at least 3 inches by 5 inches in size, be clearly visible, and have numbers and letters that are at least one-half inch high and one-eighth inch wide in a color that contrasts with the color of the sign.</i></p>
OSM Preliminary Conclusion	Support
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	

WP18–13 Executive Summary	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	

WP18–13 Executive Summary	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Oppose

DRAFT STAFF ANALYSIS WP18-13

ISSUES

Proposal WP18-13, submitted by Michael Douville of Craig, requests removing the requirement that traps and snares be marked with trapper identification in Southeast Alaska (Units 1-5).

DISCUSSION

The proponent states that during the March 2016 statewide Alaska Board of Game (BOG) meeting, the requirement to mark traps and snares under State regulations was removed. This requirement is still in place for Federal regulations. The proponent asserts that requiring Federally qualified subsistence users to mark traps while State regulations do not is unnecessary and burdensome.

Existing Federal Regulation

Units 1-5—Trapping (Special Provisions)

Trappers are prohibited from using a trap or snare unless the trap or snare has been individually marked with a permanent metal tag upon which is stamped or permanently etched the trapper's name and address, or the trapper's permanent identification number, or is set within 50 yards of a sign that lists the trapper's name and address, or the trapper's permanent identification number. The trapper must use the trapper's Alaska driver's license number or State identification card number as the required permanent identification number. If a trapper chooses to place a sign at a snaring site rather than tagging individual snares, the sign must be at least 3 inches by 5 inches in size, be clearly visible, and have numbers and letters that are at least one-half inch high and one-eighth inch wide in a color that contrasts with the color of the sign.

Proposed Federal Regulation

Units 1-5—Trapping (Special Provisions)

~~*Trappers are prohibited from using a trap or snare unless the trap or snare has been individually marked with a permanent metal tag upon which is stamped or permanently etched the trapper's name and address, or the trapper's permanent identification number, or is set within 50 yards of a sign that lists the trapper's name and address, or the trapper's permanent identification number. The trapper must use the trapper's Alaska driver's license number or State identification card number as the required permanent identification number. If a trapper chooses to place a sign at a snaring site rather than tagging individual snares, the sign must be at least 3 inches by 5 inches in size, be clearly visible, and have numbers and letters that are at least one-half inch high and one-eighth inch wide in a color that contrasts with the color of the sign.*~~

Existing State Regulation

There are no trap marking requirements in State regulations for Units 1-5.

Extent of Federal Public Lands

Federal public lands comprise approximately 88% of Units 1-5 and consist of 69% U.S. Forest Service (USFS) managed lands, 19% National Park Service (NPS) managed lands, less than 1% Bureau of Land Management (BLM) managed lands and less than 1% U.S. Fish and Wildlife Service (USFWS) managed lands (see **Unit Maps**).

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for beaver, coyote, red fox, lynx, marten, mink, muskrat, river otter, wolf and wolverine in Unit 1-5. Therefore, all Federally qualified subsistence users may harvest these species in these units.

Regulatory History

In 2012, the Board adopted Proposal WP12-14 which implemented the trap marking requirement for Units 1-5. The rationale of the Board was that the Alaska Board of Game (BOG) adopted trap marking requirements for Units 1-5 in 2006 in response to concerns by Alaska Wildlife Troopers, Alaska Department of Fish and Game (ADF&G) personnel, 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 traps being placed in areas where trapping was not allowed, or in some cases where pets were caught and contacting the trapper was not possible due to no required marking on the traps. In addition, there have been numerous cases of unattended snares being found on Prince of Wales Island without any way of contacting the responsible trapper. In some cases, snares were found after the season closed and were still capable of capturing a passing deer, bear, or wolf. In these situations, it is essential for conservation of these species that the owner of the snares be identified for both educational and enforcement purposes (FSB 2012).

The Southeast Alaska Subsistence Regional Advisory Council expressed a 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 that this does not include one bear caught in a snare, set by an unknown person for an unknown reason (SEASRAC 2011). 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.

In 2014, the Board considered Proposal WP14-01, which requested 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 was unanimously opposed by all ten Federal Subsistence Regional Advisory Councils, the Alaska Department of Fish and Game, and the public as reflected in written public comments submitted. As such, the proposal was rejected by the Board as part of its consensus

agenda (FSB 2014). The analysis for the proposal indicated its statewide application would be unmanageable, making it more appropriate for regional consideration. Additionally, it would require substantial law enforcement and public education efforts, and users could avoid the regulation by trapping under State regulations.

In March of 2016, the BOG removed trap marking requirements statewide 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.

Hunting and trapping are not allowed on Federal public lands in Glacier Bay National Park, Sitka National Historical Park or Klondike Gold Rush National Historical Park. In order to engage in subsistence in Wrangell-St. Elias National Park (WRST), the National Park Service requires that subsistence users either live within the park's resident zone (36 CFR 13.430, 36 CFR 13.1902) or have a subsistence permit (36 CFR 13.440) issued by the Park Superintendent.

Trapping seasons for most furbearers are aligned under State and Federal regulations in Units 1-5. Earlier openings do occur for some species under State regulations. There is one species for which the Federal season extends beyond the State season; beaver season is through May 15 for Units 1-5 under Federal regulations and through April 30 under State regulations. Within WRST, trapping is only allowed under Federal regulations. Consequently, with the exception of WRST and during the 2 weeks of extended season for beaver, trappers are able to trap under the less restrictive State regulations during the concurrent Federal season, and not be required to mark their traps.

Current Events

The Southeast Alaska Subsistence Regional Advisory Council submitted two proposals for the 2018-2020 Federal regulatory cycle that would align season dates for State and Federal trapping regulations in the Southeast Region. Proposal WP18-03 requests modifying the Federal hunting and trapping seasons in Unit 1 for wolves to match those currently under State regulations. Proposal WP18-05 requests lengthening the Federal hunting and trapping seasons for wolves in Unit 3 to match those currently under State regulations.

The Wolf Technical Committee (2017) recommended that USFS and ADF&G staff work with advisory groups and law enforcement to determine need and effectiveness of wolf trap marking requirements for Unit 2 wolves in both State and Federal regulations. These discussions have not yet occurred.

Effects of the Proposal

Federally qualified subsistence users are currently required to purchase and install metal name tags on their traps and snares, or to place a sign near their snare site(s). Copper tags stamped with the trapper's identification information, including fasteners, are relatively inexpensive (approximately \$25 per 100 tags or less for "write your own" tags). Adoption of this proposal would remove that requirement; saving trappers this limited expense and burden.

The requirement to mark traps under Federal regulations is currently difficult to enforce. Removing this regulation would align State and Federal regulations and reduce confusion for users and law enforcement. Within WRST, trapping is only allowed under Federal regulations, thus adopting this proposal would remove the requirement to mark traps in the Park.

Although marking traps does not necessarily prevent illegal trapping activity or prevent dogs from getting trapped, it does allow law enforcement to identify trappers that have traps deployed outside the open season or have otherwise violated regulations, and may encourage responsible and ethical trapping. Recent examples of illegal activities (trapping out of season and wonton waste) have occurred in the Yakutat area, for example, where without the State marking requirement law enforcement officers did not have the information available to contact the trappers regarding the violations. It also allows law enforcement officers to contact trappers and educate them on trapping rules and regulations in the case of unintentional violations or to minimize user conflicts including injured pets. Adoption of this proposal would decrease enforcement officer's abilities to identify and contact individual trappers for any of these situations, and decrease their overall ability to enforce legal and responsible/ethical trapping, which may result in localized conservation concern for some species. However, given that trappers are currently not required to mark traps under State regulations, and no additional harvest is expected to occur, no additional conservation concerns are anticipated.

The marking of traps has an added public safety benefit; if non-trappers, including parents and dog owners, encounter a set while recreating, they can contact the trapper for more information on trapping activity in the area, thus reducing the potential for user conflicts including injured children and pets. Minimizing user conflicts also helps prevent negative public attitude regarding trapping. Adoption of this proposal would remove these benefits. Subsequently, there would be minimal beneficial effects to other users (i.e. recreationists/dog walkers).

Removing the requirement to mark traps may prevent harassment of individual trappers by persons opposed to trapping. However, currently, trappers can use their permanent identification number (Alaska driver's license number or State identification card number) to meet the marking requirement, which may provide some level of confidentiality.

Adoption of this proposal would preempt the efforts of the Wolf Technical Committee and its discussions with law enforcement and interested groups. Results of these discussions would, however, be useful when considering future proposals.

OSM PRELIMINARY CONCLUSION

Support Proposal WP18-13.

Justification

Adoption of this proposal will align State and Federal regulations related to trap marking throughout most of Units 1-5. Requiring traps to be marked does not prevent illegal trapping activity, and in most cases users are currently able to trap under the less restrictive State regulations, effectively rendering the Federal

marking requirement unenforceable as Federally qualified users could avoid the requirement by trapping under State regulations. There will be minimal effects to other users. There is no anticipated conservation concern with adopting this proposal, as there is no established correlation between level of harvest and trap marking requirements. Future discussions between State and Federal managers, including law enforcement users, as well as input from the public, should continue.

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WRITTEN PUBLIC COMMENTS



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: WP18- 01 – WP18-13 pertain to Southeast Alaska

1 message

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Jul 17, 2017 at 10:39 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, George Pappas <george_pappas@fws.gov>

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

From: **Curtis Donald Thomas** <seafun@kpunet.net>
Date: Fri, Jul 14, 2017 at 8:01 AM
Subject: WP18- 01 – WP18-13 pertain to Southeast Alaska
To: subsistence@fws.gov

Dear sirs,

Please stop this craziness of creating new classes of citizens with special rights. I was born in Ketchikan and lived on Prince of Whales for 20 years. Someone in your organization is promoting restricting Sitka Black-tail harvest for some residents (only two deer instead of 4) and granting others more rights (5 deer, one doe, multiple permits, extended season, etc).

Recent action has already restricted access to our hunting grounds. Since I currently live in Ketchikan (a huge metropolis of 7,000 people), I cannot start hunting on POW until Aug 16th. The season starts August 1st and ends December 31st, unless you live on POW of course, then you can start in July and continue hunting into January (even people who just moved to the island from New York City).

Your continued segmentation our population is destructive. Please stop this nonsense. The constitution says we are **all equal under the law**. What gives you the right to change this and grant some Americans more rights than others.

Another crazy policy that your group implemented (maybe another group... there are so many Federal groups in Washing trying to determine what is best for us rural residents that one can not keep track). That policy is allowing someone who lives just down the road the ability to harvest 20 halibut per day. These fish average 30-40 pounds. That means some Alaskans can harvest over 500 pounds of halibut every day if they choose while others are limited to 2 fish (which is plenty). 20 fish per day is COMMERCIAL FISHING not sport or subsistence!!!!

I guess I will have to "Self Identify" as a POW resident... if it is good enough for sexual orientation in our military, it must be acceptable for residents that actually spent half of their life in the area you now say some relocated New Yorker has more rights to than I.

Crazy, Crazy, Crazy! You are attempting to fix a problem that does not exist. Please STOP this.

Curtis Thomas
8046 N. Tongass Hwy
Ketchikan, AK 99901

WP18–51 Executive Summary	
General Description	Proposal WP18-51 requests that Federal (statewide) bear baiting restrictions be aligned with State regulations, specifically the use of biodegradable materials. <i>Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p>§ __.26(b) <i>Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:</i></p> <p style="text-align: center;">* * * *</p> <p>(14) <i>Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section. Baiting of black bears and brown bears is subject to the following restrictions:</i></p> <p style="text-align: center;">* * * *</p> <p>(iii) <i>You may use only biodegradable materials for bait; if fish or game is used as bait, you may use only the head, bones, viscera, or skin of legally harvested fish and big game, the skinned carcasses of furbearers and fur animals, small game (including the meat, except the breast meat of birds), and unclassified game wildlife for bait may be used, except that in Units 7 and 15, fish or fish parts may not be used as bait. Scent lures may be used at registered bait stations;</i></p>
OSM Preliminary Conclusion	<p>Support Proposal WP18-51 with modification to establish a definition for scent lure and clarify the regulatory language.</p> <p>The modified regulation should read:</p> <p>§ __.25(a) <i>Definitions. The following definitions apply to all regulations contained in this part: scent lure (in reference to bear baiting) means any biodegradable material to which biodegradable scent is applied or infused.</i></p> <p>§ __.26(b)(14)(iii) <i>You may use only biodegradable materials for bait; if fish or wildlife is used as bait, you may use only the head, bones, viscera, or skin of legally harvested fish and wildlife for bait, the skinned carcasses of furbearers, and unclassified wildlife may be used, except that in Units 7 and 15, fish or fish parts may not be used as bait. Scent lures may be used at registered bait stations;</i></p>

WP18–51 Executive Summary	
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional	

WP18-51 Executive Summary	
Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	3 Oppose

**DRAFT STAFF ANALYSIS
WP18-51**

ISSUES

Proposal WP18-51, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council, requests that Federal (statewide) bear baiting restrictions be aligned with State regulations, specifically the use of biodegradable materials.

DISCUSSION

The proponent states that the current Federal bear baiting restrictions are much more restrictive than the State's and do not provide for a Federal subsistence priority. The proponent proposes to align Federal and State bear baiting restrictions in order to reduce regulatory complexity, reduce user confusion, and allow baiting with items (e.g. dogfood, anise, popcorn, baked goods, grease, syrup, etc.) that have traditionally been used as bear bait by Federally qualified subsistence users and are currently allowed under State regulations.

Existing Federal Regulations

§__.26(b) Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:

* * * *

(14) Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section. Baiting of black bears and brown bears is subject to the following restrictions:

* * * *

(iii) You may use only biodegradable materials for bait; you may use only the head, bones, viscera, or skin of legally harvested fish and wildlife for bait;

Proposed Federal Regulations

§__.26(b) Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:

* * * *

(14) Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section. Baiting of black bears and brown bears is subject to the following restrictions:

* * * *

(iii) You may use only biodegradable materials for bait; **if fish or game is used as bait, you may use only the head, bones, viscera, or skin of legally harvested fish and big game, the skinned carcasses of fur-bearers and fur animals, small game (including the meat, except the breast meat of birds), and unclassified game** ~~wildlife for bait~~ **may be used, except that in Units 7 and 15, fish or fish parts may not be used as bait. Scent lures may be used at registered bait stations;**

Note: The proposal as submitted omitted the word “fish”. However, this was an oversight as the proponent’s intention was to align State and Federal regulations.

State Regulations

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

(a) A person may not establish a bear bait station to hunt bear with the use of bait or scent lures without first obtaining a permit from the department under this section.

(b) In addition to any condition that the department may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:

* * * *

(8) only biodegradable materials may be used as bait; if fish or big game is used as bait, only the head, bones, viscera, or skin of legally harvested fish and game may be used, except that in Units 7 and 15, fish or fish parts may not be used as bait;

5 AAC 92.085. Unlawful methods of taking big game; exceptions: The following methods and means of taking big game are prohibited in addition to the prohibitions in 5 AAC 92.080:

* * * *

(4) with the use of bait for ungulates and with the use of bait or scent lures for any bear, except that bears may be taken with the use of bait or scent lures as authorized by a permit issued under 5 AAC 92.044;

5 AAC 92.210. Game as animal food or bait. A person may not use game as food for a dog or furbearer, or as bait, except for the following:

(1) the hide, skin, viscera, head, or bones of game legally taken or killed by a motorized vehicle, after salvage as required under 5 AAC 92.220;

(2) parts of legally taken animals that are not required to be salvaged as edible meat, if the parts are moved from the kill site;

(3) the skinned carcass of a bear, furbearer, or fur animal, after salvage as required under 5 AAC 92.220;

(4) small game; however, the breast meat of small game birds may not be used as animal food or bait;

(5) unclassified game;

(6) deleterious exotic wildlife;

(7) game that died of natural causes, if the game is not moved from the location where it was found; for purposes of this paragraph, "natural causes" does not include death caused by a human;

(8) game furnished by the state, as authorized by a permit under 5 AAC 92.040.

Extent of Federal Public Lands

Federal public lands comprise approximately 54% of Alaska and consist of 20% U.S. Fish and Wildlife Service (USFWS) managed lands, 15% Bureau of Land Management (BLM) managed lands, 14% 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 part 100, §__.24(a)(1) and 36 CFR 242 §__.24(a)(1).

Regulatory History

In 1990, Federal regulations for bear baiting were adopted from State regulations. These regulations, specifically §__.26(b)(14)(iii), have not been modified since that time.

In 1992, Proposal P92-149 requested that bear baiting be prohibited due to habituation of bears to bait stations and human garbage, which results in bears becoming more dangerous. The Federal Subsistence Board (Board) rejected the proposal as there was no biological reason to restrict subsistence opportunity.

Currently, black bears may be taken at bait stations under Federal regulations in all units, except Units 1C, 4, 8, 9, 10, 14, 18, 22, 23, and 26. In 2014, the Board adopted Proposal WP14-50, allowing brown bears to be taken at bait stations in Unit 25D. In 2016, the Board adopted Proposal WP16-18, allowing brown bears to be taken at bait stations in Units 11 and 12.

In 2001, the Alaska Board of Game (BOG) adopted Proposal 156 to prohibit the use of fish parts as bear bait in Units 7 and 15 (ADF&G 2001). The intent of the proposal was to minimize human-bear interactions and to reduce defense of life or property (DLP) brown bear kills on the Kenai Peninsula (ADF&G 2001).

In 2015, the NPS published Final Rule 36 CFR 13.42(g)(10) prohibiting the take of black and brown bears over bait on National Preserves under State regulations. In 2016, the USFWS published a similar rule prohibiting the take of brown bears over bait on National Wildlife Refuges under State regulations. The USFWS rule was nullified when the President of the United States signed House Joint Resolution 69 into law on April 3, 2017. The Resolution invoked the Congressional Review Act, a law that permits regulations passed during the last six months of a previous administration to be overturned.

In 2016, the BOG adopted Proposal 61 as amended to insert the word “big” before game in 5 AAC 92.044(8) (see State regulations above). This was done to clarify that the skinned carcasses of legally harvested furbearers could be used as bear bait (ADF&G 2016).

In January 2017, the NPS published Final Rule 36 CFR 13.480(b) limiting types of bait that may be used for taking bears under Federal Subsistence Regulations to native fish or wildlife remains from natural mortality

or parts not required to be salvaged from a legal harvest. Based on public comment, the final rule includes a provision that allows to allow the superintendent of Wrangell-St. Elias National Park and Preserve (WRST) to issue a permit to allow use of human-produced foods upon a determination that such use is compatible with park purposes and values and the applicant does not have reasonable access to natural materials that could be used as bait (36 CFR 13.1902(d)). The exception for WRST was based on documented history of bear baiting.

Cultural Knowledge and Traditional Practices

Both black bears and brown bears are traditionally and contemporarily harvested, used, and shared across much of Alaska, though regional variations in harvest patterns, seasonal rounds and methods exist (Blackman 1990; Burch 1984; Clark 1981; Crow & Obley 1981; de Laguna & McClellan; de Laguna 1990; Hosley 1981; Lantis 1984; Slobodin 1981; Snow 1981; Townsend 1981). Historical methods of harvest among Alaska Native cultural groups included spearing (Brown 2012; Crow & Obley 1981; de Laguna & McClellan 1981; de Laguna 1990; Townsend 1981), harvest at winter den sites (Brown 2012; Hosley 1981; de Laguna 1990), snaring (Burch 1984; de Laguna & McClellan 1981; de Laguna 1990), bow and arrows (de Laguna 1990; Townsend 1981), deadfalls (de Laguna & McClellan 1981; de Laguna 1990), and with dogs (de Laguna & McClellan 1981; de Laguna 1990). Today, bears are frequently hunted with rifles while in pursuit of other large land mammals (ADF&G 1992; ADF&G 2008; Brown 2012).

The occurrence of bear baiting as a component of traditional harvest methods is limited within published literature; it is unknown if the practice occurred rarely or if it was merely seldom documented. Among the Upper Kuskokwim (Kolchan) Athabascans, some hunters were known to use ground squirrel nests to attract bears that had recently emerged from their dens in the spring (Brown 2012). A squirrel would be released near the bear and the bear would follow the tracks back to the nest where it would be harvested with lances (Brown 2012).

In Southeast Alaska, Tlingit hunters sometimes used dead falls to harvest bears and these were either set across bear trails or baited to attract bears (ADF&G 1992). The bait ingredients are unknown. Among several Athabaskan groups in Alaska's interior, documented methods of harvesting black bears included hunting with bow and arrow or lacing bait with coiled baleen that would expand and rupture the bear's digestive tract (ADF&G 2008). Use of bear baiting stations to attract and harvest black bears has also been documented specifically for hunters from the community of Tok (ADF&G 2008). In a 2001-2002 study of 18 southwest Alaska communities there was no documentation of the use of baiting stations for harvesting bears (Holen et al. 2005).

Contemporary use of bait stations for bear hunting in Alaska has been contentious (Harns 2004). While some people believe that baiting black bears is acceptable, others have suggested that the method violates fair chase ethics (Harns 2004). The method allows hunters to be selective and humane, it helps hunters with limited mobility to participate by reducing trekking distance, and it facilitates clean kills by bow hunters that harvest animals at a closer range (Harns 2004). Additionally, it allows hunters to be more selective, to more easily identify sex, and to verify the presence or absence of cubs with sows (Harns 2004).

Opponents of bear baiting often reference safety concerns and food conditioning (Cunningham 2017, Hilderbrand et al. 2013). The National Park Service has also cited concerns regarding preventing the

defense of life and property killing of bears and maintaining natural processes and behaviors (Hilderbrand et al. 2013). To alleviate some of these concerns, BOG and the Board have implemented several restrictions that stipulate where bear baiting stations are allowed, that require bear baiting stations to be registered with ADF&G, and that require the completion of an ADF&G bear baiting clinic for all hunters age 16 and older.

Other Alternatives Considered

Adoption of this proposal would permit the use of scent lures at bear baiting stations under Federal regulations. According to 50 CFR §__.25(a) *Definitions* and 5 AAC 92.990 *Definitions*, bait is defined as “any material excluding scent lures, that is placed to attract an animal by its sense of smell or taste; however, those parts of legally taken animals that are not required to be salvaged and which are left at the kill site are not considered bait.” While scent lures are excluded from the bait definition, they are not explicitly defined under Federal or State regulations. If scent lures are not defined, any material and chemical could be used at registered bait stations on Federal public lands, including toxic and non-biodegradable ones.

Effects of the Proposal

If this proposal is adopted, Federally qualified subsistence users would be able to use any biodegradable material as well as scent lures at registered bear baiting stations on lands administered by the USFWS, BLM, and USFS. As bear bait is limited to native fish and wildlife remains on NPS administered lands, this proposal would not affect NPS lands (with some exceptions in WRST). This will provide Federally qualified subsistence users with greater opportunity on most Federal public lands and will align State and Federal baiting restrictions, reducing regulatory complexity and user confusion. Currently, Federal regulations are more restrictive than State regulations. As the requested changes are already permitted under State regulations, no appreciable differences in bear harvests, populations, subsistence uses, or habituation of bears to human foods are expected from this proposal.

OSM PRELIMINARY CONCLUSION

Support Proposal WP18-51 **with modification** to establish a definition for scent lure and clarify the regulatory language.

The modified regulation should read:

*§__.25(a) Definitions. The following definitions apply to all regulations contained in this part: **scant lure means any biodegradable material to which biodegradable scent is applied or infused.***

*§__.26(b)(14)(iii) You may use only biodegradable materials for bait; **if fish or wildlife is used as bait, you may use only the head, bones, viscera, or skin of legally harvested fish and wildlife for bait, the skinned carcasses of furbearers, and unclassified wildlife may be used, except that in Units 7 and 15, fish or fish parts may not be used as bait. Scent lures may be used at registered bait stations;***

Justification

Adoption of this proposal will reduce regulatory complexity and provide greater opportunity for Federally qualified subsistence users by expanding and clarifying the use of biodegradable materials and scent lures as bear bait. There are no conservation concerns as these proposed clarifications are already permitted under State regulations.

Defining scent lures in regulation is necessary to ensure that only appropriate and non-harmful materials and scents are used on Federal public lands. The terms “game”, “fur animals”, and “small game” are not defined under Federal regulations, but are included in the Federal definition of “wildlife.” While the term “big game” is defined under Federal regulations, it is also included within the Federal definition of “wildlife.”

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WRITTEN PUBLIC COMMENTS



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 1:55 PM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Sharon Alden** <fwxsca@yahoo.com>
Date: Fri, Aug 4, 2017 at 1:52 PM
Subject: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24
To: "subsistence@fws.gov" <subsistence@fws.gov>

To: Office of Subsistence Management
Attention: Theo Matuskowitz
From: Sean McGuire
Re: comments on proposal WP 18-51, 18-03, 18-4, 18-5, 18-24

I am opposing proposal WP 18-51 There should be no human food or any human substance to bait any animals. This is so basic. The last thing we want is to habituate bears or any wild animal to human food. This is an ethical as well as a safety issue. The last thing we want to see is the federal baiting regulations aligned with the state of Alaska's. The State baiting regulations are painfully out dated and present a glaring safety issue.

I am opposing proposal WP 18-03 the extended hunting and trapping season in game unit one. Over kill.

I am really opposed to proposal WP 18-04. Why in the world would you want to put more pressure on a wolf population that's already in trouble this appears to be contrary to the basic concept of wildlife management?

I am also opposing proposal WP 18-05 relates to my opposition to WP18-04.

I am also opposing in the strongest possible terms proposal WP 18-24 To heard wildlife with snow machines is one of the most unethical things I can imagine and the backlash would be harsh.

Thank you for your attention
Sean McGuire
159 Kniffen Rd

Fairbanks, Ak.
ph 907-888-0124
email fwxsc@yahoo.com



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: Comment on Proposed WP 18-51

AK Subsistence, FW7 <subsistence@fws.gov> Thu, Aug 3, 2017 at 7:48 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>
Cc: Paul Mckee <paul_mckee@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

----- Forwarded message -----
From: **Jim & Suzanne Kowalsky** <jimkowalsky@yahoo.com>
Date: Wed, Aug 2, 2017 at 5:07 PM
Subject: Fwd: Comment on Proposed WP 18-51
To: subsistence@fws.gov

Attention as noted below.
Begin forwarded message:

From: Jim & Suzanne Kowalsky <jimkowalsky@yahoo.com>
Subject: Comment on Proposed WP 18-51
Date: August 1, 2017 at 12:17:30 PM AKDT

August 1, 2017

To: Office of Subsistence Management
p: Theo Matuskowitz
FR: Alaskans FOR Wildlife, Jim Kowalsky, Chair
Re: Comments on Proposal WP 18-51

Alaskans FOR Wildlife is a statewide member organization that advocates for naturally occurring Alaskan wildlife through education and advocacy headquartered in Fairbanks, Alaska PO Box 81957 99708 phone 907-488-2434

We wish to most strongly oppose proposal WP 18-51 which proposes to allow federally qualified subsistence hunters to add the use of human-produced foods and scent to the presently permitted use of biodegradable materials used to bait bears on all public federal lands, e.g.: federal wildlife refuges, national forests, BLM and National Park Service lands now open to rural subsistence.

We understand this proposal emerges from a request from the Eastern Alaska Regional Subsistence Advisory Council, purportedly to align federal with state bear baiting regulations which allow use of such as dog food, popcorn, grease, syrup, etc., to be used by federally qualified subsistence users currently, but only on state lands.

Our objection to WP 15-18 arises from the reality that such liberalization increases the already adverse effect of human food used to attract bears especially as a matter of public safety. Use of human foods will continue to alter bear behavior, increasing the numbers of human food-conditioned bears, attracting them to specific locations where conflicts with humans is certain to occur with increasing frequency. Such encounters would likely increase over time, resulting in serious human injuries and wrenching tragic deaths of the sort that Alaska currently experiences, and also more

killing offending bears.

Further negative impacts already occurring with frequency are bears attracted to humans and their food wastes in specific locations being killed in defense of life and property. Recent examples of bears that likely have become habituated to human foods being killed in defense of life and property have occurred at Prudhoe Bay and in Southeast Alaska with many other examples over time.

We view enactment of WP 15-18 would be highly irresponsible by perpetuating and increasing the already unfortunate practice of use of human produced foods at bait sites on state lands. This proposal amounts to making a serious increased threat to public safety on federal lands and to that already perpetuated on state lands.

Important also, WP15-18 proposes to gradually alter what should also be a natural growth and behavior of wild bears which should be allowed to exist and flourish in its natural wildlands habitat.

The proposal should not be enacted in the best interests of human and bear populations.
Thank you for consideration of our comment.



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 7:51 AM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Francis Mauer** <fmauer@mosquionet.com>
Date: Thu, Aug 3, 2017 at 9:02 PM
Subject: Comments on Proposals to the Federal Subsistence Board Attn. Theo Matuskowitz
To: subsistence@fws.gov

Comments Regarding Federal Subsistence Proposals: WP 18-03, 18-04, 1805, 18-24, and 18-51

Submitted to the Federal Subsistence Board by Fran Mauer, P.O. Box 80464, Fairbanks, AK 99708. August 3, 2017.

WP 18-03 I am opposed to extending the wolf hunting and trapping seasons in Unit 1. Wolves are highly vulnerable to harvest as it is, further extending of seasons is not justified, and would likely lead to excessive harvest of wolves as occurred on Prince of Wales Island last year which was supposed to be regulated by a quota, but even with quota rules in place the actual harvest exceeded the quota by 2.6 times. This proposal should be denied.

WP 18-04 This proposal would allow 30% of the wolf population on Prince of Wales Island to be harvested when existing harvest is 20%. As noted above, wolves are highly vulnerable to harvest, and last year's harvest exceeded the quota by 2.6 times! The extensive network of roads and trails on Prince of Wales render wolves exceptionally vulnerable. Expanding the harvest to 30% of the population following excessive harvest last year can not be justified given the failed management of this quota system last year. This proposal would lead to excessive harvest of an already depleted population and should be denied to conserve wolves on the Island.

WP 18-24 This proposal will open the door to harassment of wildlife by snow machines and violate a basic premise of hunting: respect for animals and fair chase principles. It would also result in excessive impacts to other animals that are not harvested due to disturbance associated with this "practice." Furthermore, it will exacerbate difficulty in enforcement of harassment rules. Approval of this proposal would give a black eye to subsistence in general, and certainly the Federal Subsistence Board, specifically for condoning such an inappropriate practice on the Federal public lands of

Alaska. Deny this proposal.

WP 18-51 This proposal would lower Federal standards for baiting to the lowest common denominator: State requirements. By allowing the use of human food items such as syrup, old dough nuts and other human refuse will habituate bears to humans and contribute to human – bear conflicts, and expose innocent people to risks from bears that no longer fear humans. Every spring the Alaska Dept of Fish and Game sponsors public service announcements advising folks to keep their garbage and bird feeder refuse secure from bears, clearly stating the danger to humans from habituated bears. There is absolutely no justification to also allow the use of human foods and scent to bait bears. I urge the Board to reject this proposal (18-51).

Thank you for the opportunity to comment.

Fran Mauer

FISHERIES RESOURCE MONITORING PROGRAM

BACKGROUND

Beginning in 1999, the Federal government assumed expanded management responsibility for subsistence fisheries on Federal public lands in Alaska under the authority of Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Expanded subsistence fisheries management introduced substantial new informational needs for the Federal system. Section 812 of ANILCA directs the Departments of the Interior (DOI) and Agriculture (USDA), cooperating with the State of Alaska and other Federal agencies, to undertake research on fish and wildlife and subsistence uses on Federal public lands. To increase the quantity and quality of information available for management of subsistence fisheries, the Fisheries Resource Monitoring Program (Monitoring Program) was established within the Office of Subsistence Management (OSM). The Monitoring Program was envisioned as a collaborative interagency, interdisciplinary approach to enhance existing fisheries research, and effectively communicate information needed for subsistence fisheries management on Federal public lands.

Biennially, OSM announces a funding opportunity for investigation plans addressing subsistence fisheries on Federal public lands. The 2018 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 in **Figure 1**.

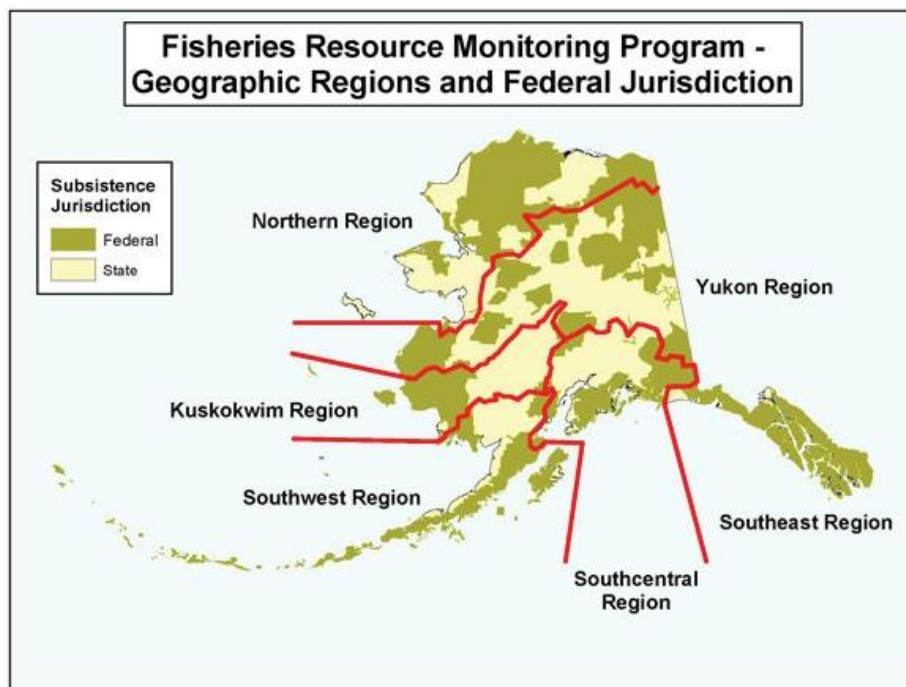


Figure 1. Geographic Regions for the Fisheries Resource Monitoring Program.

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. These plans identify prioritized information needs for each major subsistence fishery and are available for viewing on the Federal Subsistence Management Program website (<https://www.doi.gov/subsistence/frmp/funding>). Individual copies of plans are available by placing a request to OSM. Independent strategic plans were completed for the Yukon and Kuskokwim regions for salmon in 2005. For the Northern Region and the Cook Inlet Area, assessments of priority information needs were developed from regional working groups and experts on the Subsistence Regional Advisory Councils, the Technical Review Committee (a committee comprised of representatives from each of the five Federal agencies involved with subsistence management, and relevant experts from the Alaska Department of Fish and Game), and Federal and State managers, with technical assistance from OSM staff. Finally, a strategic plan specifically for research on whitefish species in the Yukon and Kuskokwim River drainages was completed in spring 2011 as a result of efforts supported through Monitoring Program project 08-206 (Yukon and Kuskokwim Coregonid Strategic Plan).

Investigation plans are reviewed and evaluated by OSM and Forest Service staff, and then 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 these five criteria: strategic priority; technical and scientific merit; investigator ability and resources; partnership and capacity building; and cost benefit.

Project abstracts and associated Technical Review Committee proposal scores are assembled into a draft 2018 Fisheries Resources Monitoring Plan. The draft plan is distributed for public review and comment through Subsistence Regional Advisory Council meetings, beginning in August 2017. The Federal Subsistence Board will review the draft plan and will accept written and oral comments at its January 2018 meeting. The Federal Subsistence Board takes into consideration recommendations and comments from the process, and forwards their comments to the Assistant Regional Director of OSM. Final funding approval lies with the Assistant Regional Director of OSM. Investigators will subsequently be 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 2001, a total of \$117.2 million has been allocated for the Monitoring Program to fund a total of 452 projects (**Figure 2; Figure 3**).

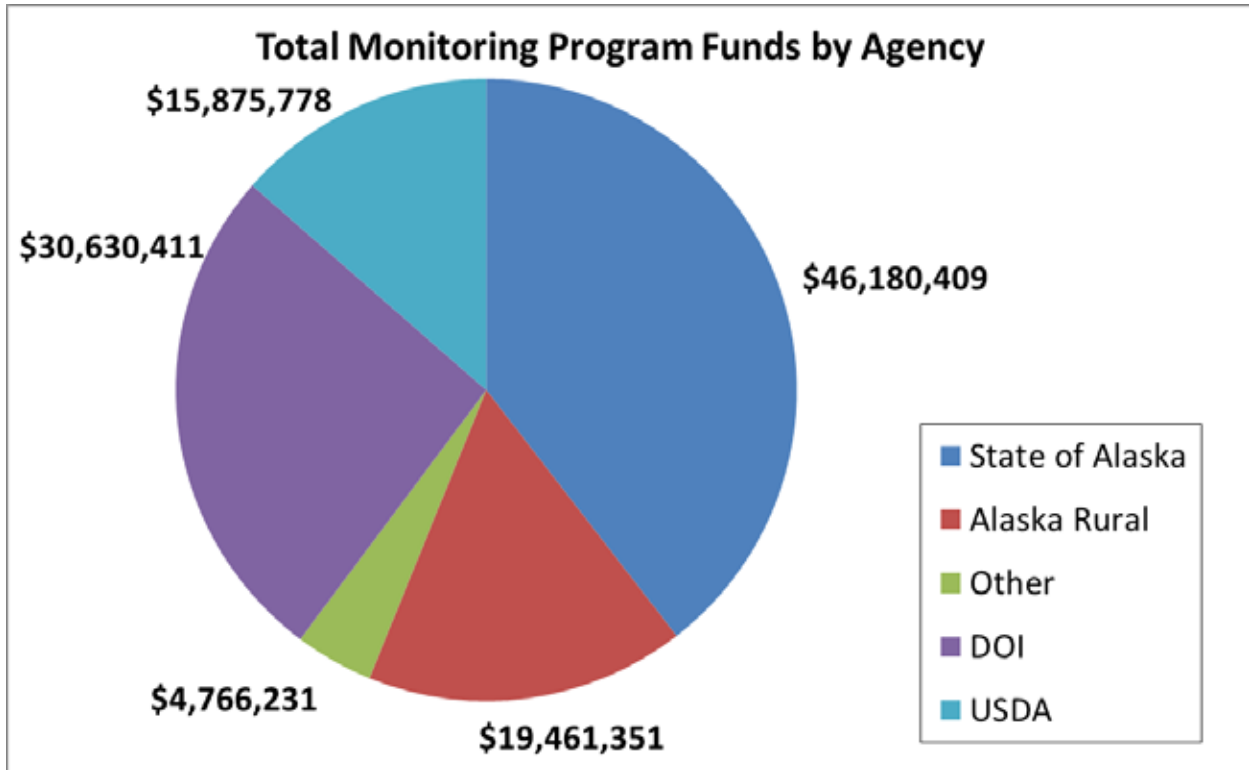


Figure 2. Total Project funds through the Monitoring Program from 2000 through 2016 listed by the organization of the Principal Investigator for projects funded. The funds listed are the total approved funds from 2000 to 2016. DOI = Department of Interior and USDA = U.S. Department of Agriculture.

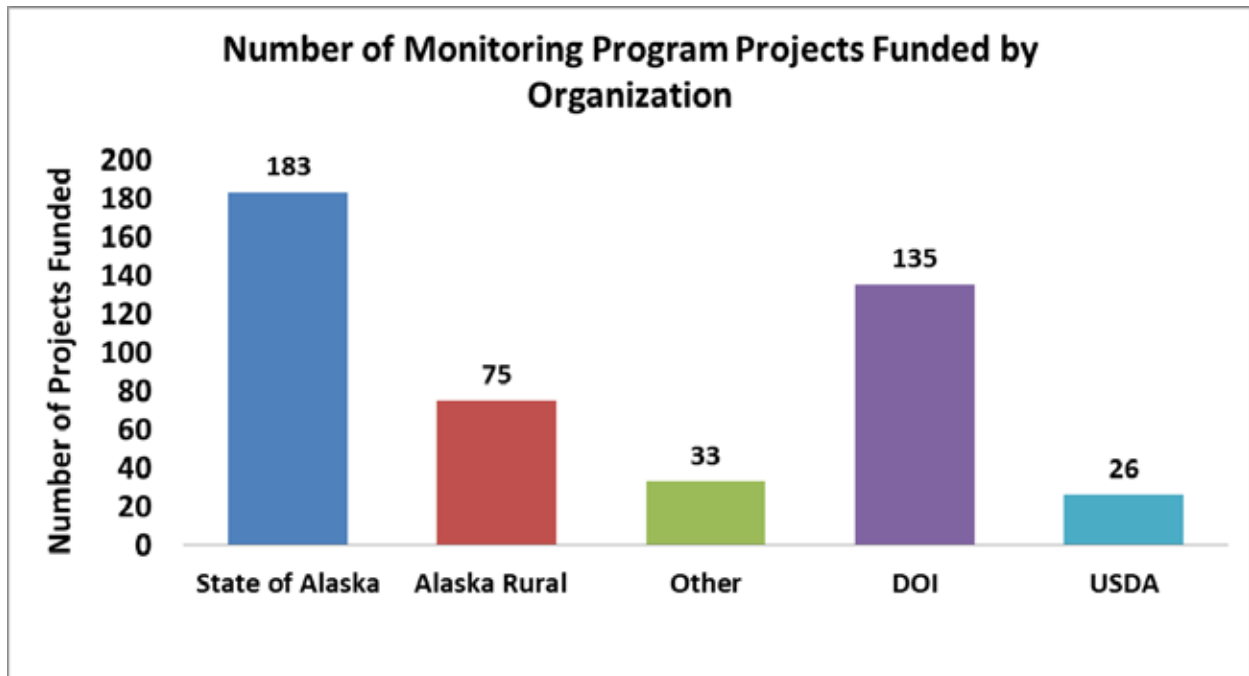


Figure 3. The total number of projects funded through the Monitoring Program from 2000 through 2016 listed by the organization of Principal Investigator. DOI = Department of Interior and USDA = U.S. Department of Agriculture.

During each biennial 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) and data type. 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 with subsistence harvest. Budget guidelines provide an initial target for planning; however they are not final allocations and will be adjusted annually as needed (Figure 4; Figure 5).

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

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

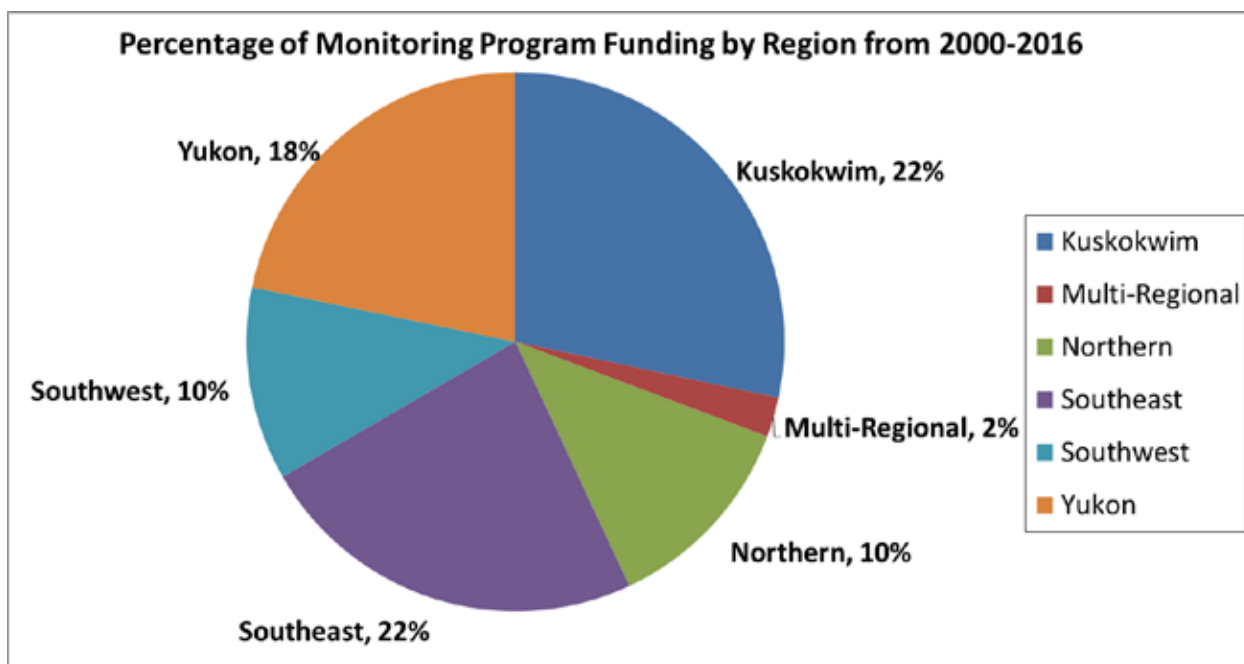


Figure 4. Total Project Funding by Geographic Region from 2000 through 2016.

Two primary types of research projects are solicited for the Monitoring Program including Harvest Monitoring/Traditional Ecological Knowledge (HMTEK) and Stock, Status and Trends (SST), although projects that combine these approaches are also encouraged. Project funding by type is shown in Figure 5.

Definitions of the two project types are listed below:

Harvest Monitoring and Traditional Ecological Knowledge (HMTEK) -These projects address assessment of subsistence fisheries including quantification of harvest and effort, and description and assessment of fishing and use patterns.

Stock Status and Trends Studies (SST) - These projects address abundance, composition, timing, behavior, or status of fish populations that sustain subsistence fisheries with linkage to Federal public lands.

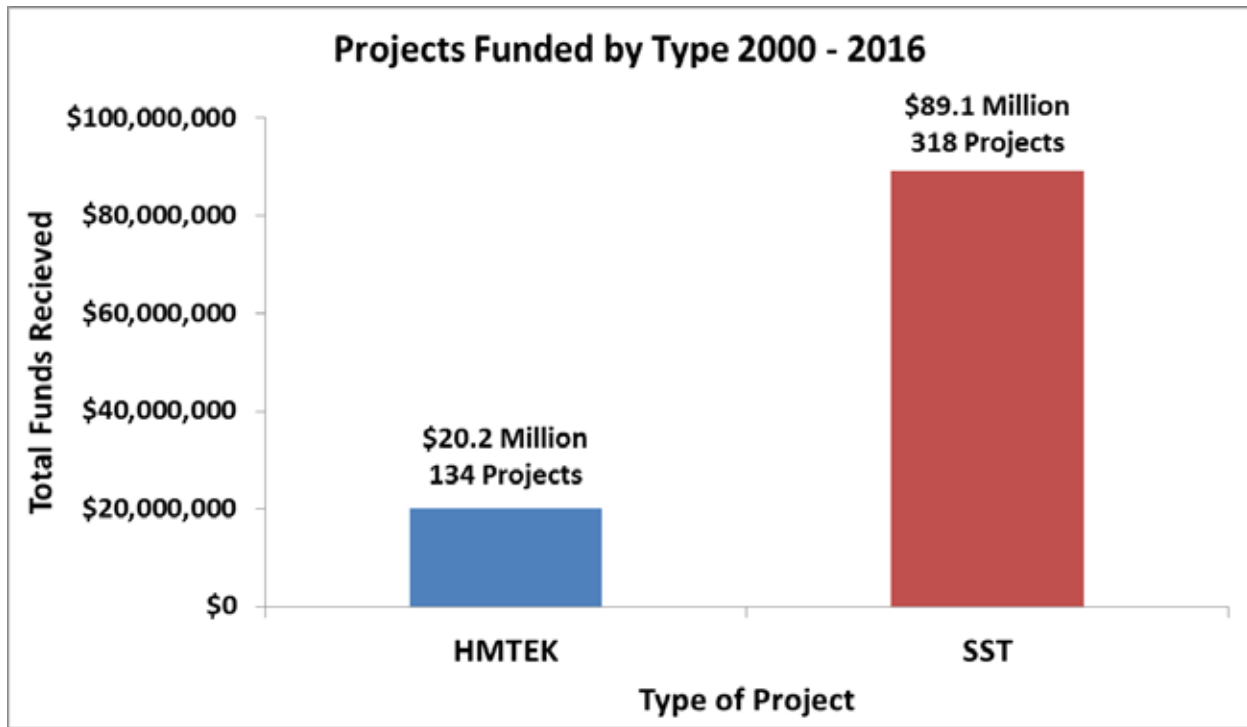


Figure 5. Total Project funding by type from 2000 through 2016. HMTEK = Harvest Monitoring/ Traditional Ecological Knowledge and SST = Stock, Status and Trends.

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 Program, technically sound, administratively competent, promote partnerships and capacity building, and are cost effective. Projects are evaluated by a panel called the TRC. 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 TRC reviews, evaluates, and make recommendations about proposed projects, consistent with the mission of the Monitoring Program. Fisheries and Anthropology staff from

the OSM provide support for the TRC. Recommendations from the TRC provide the basis for further comments from Subsistence Regional Advisory Councils, the public, the Interagency Staff Committee (ISC), and the Federal Subsistence Board, with final approval of the Monitoring Plan by the Assistant Regional Director of OSM.

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. Complete project packages need to be submitted on time and must address five specific criteria (see below) to be considered a high quality project. Five criteria are used to evaluate project proposals:

1. ***Strategic Priorities*** – Studies should be responsive to information needs identified in the *2018 Priority Information Needs* <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,**
 - **Conservation mandate,**
 - **Potential impacts on the subsistence priority,**
 - **Role of the resource, and**
 - **Local concern.**
2. ***Technical-Scientific Merit*** – Technical quality of the study design must meet accepted standards for information collection, compilation, analysis, and reporting. Studies must have clear objectives, appropriate sampling design, correct analytical procedures, and specified progress, annual, and final reports.
3. ***Investigator Ability and Resources*** – Investigators must show they are capable of successfully completing the proposed study by providing information on the ability (training, education, and experience) and resources (technical and administrative) they possess to conduct the work. Applicants that have received funding in the past will be evaluated and ranked on their past performance, including fulfillment of meeting deliverable 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*** – Collaborative partnerships and capacity building are priorities of the Monitoring Program. ANILCA Title VIII mandates that rural residents be afforded a meaningful role in the management of subsistence fisheries, and the Monitoring

Program offers opportunities for partnerships and participation of local residents in monitoring and research. Investigators must not only inform communities and regional organizations in the area where work is to be conducted about their project plans, but must also consult and communicate with local communities to ensure that local knowledge is utilized and concerns are addressed. Letters of support from local communities or organizations that will collaborate on the proposed project add to the strength of a proposal. Investigators and their organizations must 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.

Investigators are encouraged to develop the highest level of community and regional collaboration that is practical. 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. 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) must be clearly demonstrated in proposals.

5. *Cost Benefit*

Cost/Price Factors – An applicant’s cost/price proposal will be evaluated for reasonableness. For a price to be reasonable, it must represent a price to the government that a prudent person would pay when consideration is given to prices in the market. Normally, price reasonableness is established through adequate price competition, but may also be determined through cost and price analysis techniques.

Selection for Award – Applicant 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, taking into consideration the technical factors listed above and the total proposed price across all agreement periods.

POLICY AND FUNDING GUIDELINES

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

1. Projects of up to four years duration may be considered in any year’s monitoring plan.
2. Studies must not duplicate existing projects.
3. A majority of Monitoring Program funding will be dedicated to non-Federal agencies.

4. Long term projects will be considered on a case by case basis.
5. Capacity building is considered a critical component of all projects, and all investigators are expected to incorporate capacity building and partnerships within their projects.
6. Activities that are not eligible for funding include:
 - a) habitat protection, mitigation, restoration, and enhancement;
 - b) hatchery propagation, restoration, enhancement, and supplementation;
 - c) contaminant assessment, evaluation, and monitoring; and
 - d) 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.

2018 FISHERIES RESOURCE MONITORING PLAN

For 2018, a total of 53 investigation plans were received and 53 are considered eligible for funding. Of the projects that are considered for funding, 40 are SST projects and 13 are HMTEK projects.

For 2018, the Department of the Interior, through the U.S. Fish and Wildlife Service, will provide an anticipated \$1.0 to \$1.5 million in funding for new projects and up to \$1.6 million for ongoing projects that were initially funded in 2016. The U.S. Department of Agriculture, through the U.S. Forest Service, has historically provided \$1.8 million annually. The amount of U.S. Department of Agriculture funding available for 2018 projects is uncertain.

FISHERIES RESOURCE MONITORING PROGRAM SOUTHEAST ALASKA REGION OVERVIEW

Since the inception of the Monitoring Program in 2000, 71 projects have been undertaken in the Southeast Alaska Region for a total of \$22.7 million (**Figure 1**). Of these, the State of Alaska was the lead agency for 30 projects, Alaska Rural Organizations conducted 17 projects, the Department of the Interior conducted one project, and the U.S. Department of Agriculture conducted 23 projects (**Figure 2**). Fifty-four projects were Stock, Status, and Trends (SST), and 17 projects were Harvest Monitoring and/or Traditional Ecological Knowledge (HMTEK). A list of all Southeast Alaska Region Monitoring Program projects from 2000 to 2016 is provided in **Appendix A**.

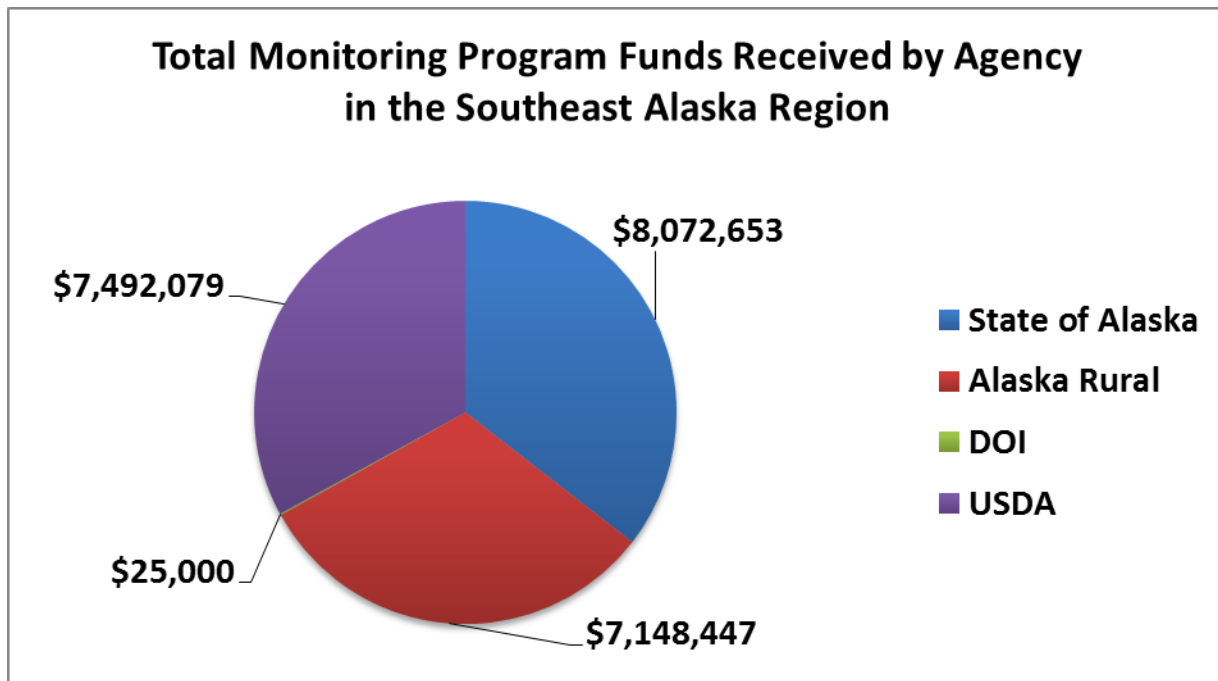


Figure 1. Monitoring Program funds received by agencies for projects in the Southeast Alaska Region. The funds listed are the total approved funds from 2000 to 2016. DOI = Department of the Interior and USDA = Department of Agriculture.

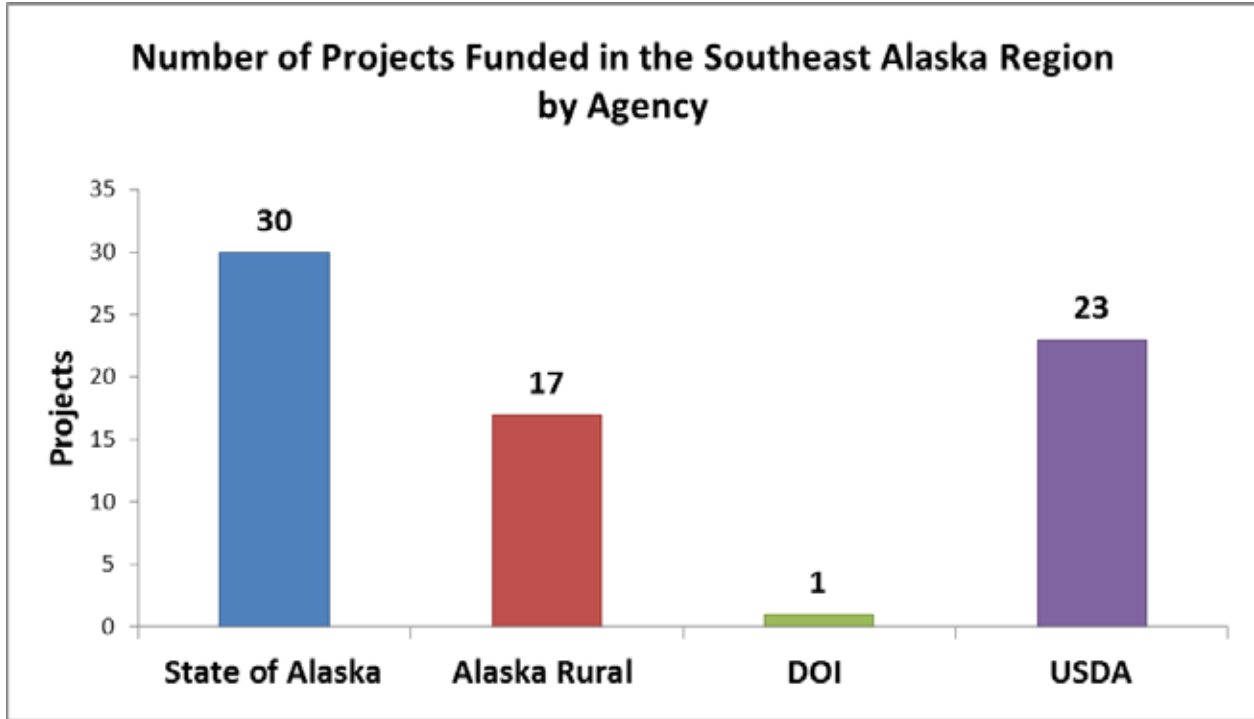


Figure 2. Total number of Monitoring Program projects funded, by agency, in the Southeast Alaska Region from 2000 to 2016. DOI = Department of Interior and USDA = U.S. Department of Agriculture.

2018 DRAFT SOUTHEAST FISHERIES RESOURCE MONITORING PLAN OVERVIEW

Priority Information Needs

The 2018 Notice of Funding Opportunity for the Southeast Alaska Region identified four 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 Virginia Lake.
- Escapement indexes for Eulachon at the Unuk River and the Yakutat Forelands.
- 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.

Available Funds

Federal Subsistence Board guidelines direct initial distribution of funds among regions and data types. Regional budget guidelines provide an initial target for planning. For 2018, the U.S. Department of the Interior, through the U.S. Fish and Wildlife Service, will provide an anticipated \$1.0 to \$1.5 million in funding for new projects and up to \$1.6 million for ongoing projects that were initially funded in 2016. The U.S. Department of Agriculture, through the U.S. Forest Service, has historically provided up to \$1.8 million annually. The amount of the U.S. Department of Agriculture funding available for 2018 projects is uncertain.

Technical Review Committee Proposal Score

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 TRC to develop the strongest possible Monitoring Plan for each region and across the entire state.

For the 2018 Monitoring Program, 13 project proposals were submitted for the Southeast Alaska Region. The TRC evaluated and scored each proposal for Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The final score

determined the scoring of each proposal within the region (**Table 1**, 1= first place, 2 = second place, etc.). Projects that are placed higher comprise a strong Monitoring Plan for the region by addressing strategically important information needs based on sound science and promote cooperative partnerships and capacity building. The projects listed are currently being considered for funding in the 2018 Monitoring Program. Projects which were not eligible due to the nature of the activity are not included. For more information on projects submitted to the 2018 Monitoring Program please see the abstracts in **Appendix B**.

Table 1. TRC scores for projects in the Southeast Alaska Region. Projects are listed by TRC score and include the total funds requested and the average annual request for each project submitted to the 2018 Monitoring Program within the Southeast Alaska Region (1 = first place, 2 = second place, etc.). The projects listed are currently being considered for funding in the 2018 Monitoring Program. Projects which were not eligible due to the nature of the activity are not included.

TRC Score	Project Number	Title	Total Project Request	Average Annual Request
1	18-610	Klag Lake Sockeye Stock Assessment	\$567,772	\$141,943
2	18-604	Hetta Lake Sockeye Stock Assessment	\$679,106	\$169,777
3 (tied)*	18-609	Sitkoh Lake Sockeye Stock Assessment	\$331,498	\$82,875
3 (tied)*	18-602	Falls Lake Sockeye Stock and Harvest Assessment	\$488,241	\$122,060
3 (tied)*	18-603	Gut Bay Sockeye Stock and Harvest Assessment	\$509,253	\$127,313
4	18-607	Neva Lake Sockeye Stock Assessment	\$608,426	\$152,107
5	18-606	Kook Lake Sockeye Stock Assessment	\$630,337	\$157,584
6	18-600	Alecks Creek Sockeye Stock Assessment	\$509,879	\$127,469
7	18-608	Sarkar Lake Sockeye Stock Assessment	\$359,725	\$89,931
8	18-612	Kanalku Lake Sockeye Stock Assessment	\$746,400	\$186,600
9	18-605	Klawock Lake Sockeye Stock Assessment	\$116,410	\$29,103
10	18-611	North Southeast Alaska Eulachon Population Monitoring	\$768,317	\$192,079
11	18-601	District 1 Eulachon Assessment	\$168,745	\$42,186
Total			\$6,484,109	\$1,621,027

* Proposals with identical scores during the rating process may be further assessed by comparing the average annual cost. Proposals with a lower average annual cost may be ranked above a similar rated proposal that has a higher annual average cost.

**2018 PROJECT SUMMARY AND TRC JUSTIFICATION
FOR PROJECT RANKING**

TRC Ranking: 1
Project Number: 18-610
Project Title: Klag Lake Sockeye Salmon Stock Assessment

Project Justification: The Sitka Tribe of Alaska seeks four years of funding to continue a stock status and trends and harvest monitoring project for Sockeye Salmon at Klag Bay. This project will provide additional information on a Sockeye Salmon stock important to Federally qualified subsistence users in Sitka. The Klag Lake watershed is located on Chichagof Island within the Tongass National Forest. Although there is a Federal subsistence fishery in the Klag Lake watershed, most subsistence harvest occurs in State managed marine waters in adjacent marine waters. Escapement and harvest assessments for the Klag Lake Sockeye Salmon stock were included in the 2018 Notice of Funding Opportunity, namely: *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 Virginia Lake.*

This project has been funded through the Monitoring Program since 2001 and has provided valuable information for the management of the resource. The ability for in-season data to guide management has kept the subsistence harvest limits high due to the ability for managers to act quickly in times of conservation concern. Since 2008, the exploitation rate on this stock has roughly doubled while 2015 and 2016 escapements were some of the lowest on record. The objectives and methods outlined in the investigation plan are clear, measurable and achievable and have been used successfully at other Monitoring Program projects.

The Sitka Tribe of Alaska has robust natural resources and administration departments. Together they have the resources to manage contracts, conduct the field component, and follow through on deliverables. Local Alaska Natives will be targeted to fill seasonal fisheries technician positions. Four letters of support were received for this project from the City and Borough of Sitka, the Sitka Conservation Society, the ADF&G, and the USFS. The letters cited the importance of the resource to the community of Sitka, conservation concerns and management concerns as reasons for supporting the project.

The average annual cost of this project is average for Monitoring Program projects in Southeast Alaska with similar objectives, deliverables and logistical challenges.

TRC Ranking: 2
Project Number: 18-604
Project Title: Hetta Lake Subsistence Sockeye Salmon Project

Project Justification: Anthony Christianson, natural resources director for the Hydaburg Cooperative Association, proposes to lead a Sockeye Salmon stock status and trends project at Hetta Lake coupled with a community wide Sockeye Salmon harvest monitoring program in Hydaburg. This would be a continuation of a project funded in some form through the Monitoring Program since the early 2000's.

This project addresses a 2018 priority information need identified by the Southeast Alaska Subsistence Regional Advisory Council and was included in the 2018 Notice of Funding Opportunity, namely:

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 Virginia Lake. Since Hetta Lake is the primary source of Sockeye Salmon for Hydaburg, recent poor escapements resulted in Hydaburg being unable to meet their subsistence Sockeye Salmon needs. The Hetta Lake watershed is located within the exterior boundaries of the Tongass National Forest.

Sockeye Salmon escapement and harvest data collected from Hetta Lake has been useful in documenting trends and aiding in-season management. In years with low Sockeye Salmon returns the community has voluntarily shifted subsistence fishing effort away from Hetta Lake based on in-season weir data while the ADF&G has used the data to adjust commercial fishing dates and locations in the area.

The investigation plan for this project has not changed substantially from past Monitoring Program funding cycles and, aside from a few suggestions, the objectives and methods are clear and measurable. The investigators have a good record of satisfactorily completing several Monitoring Program projects and submitting timely deliverables. The principal investigator is a local Alaska Native resident of Hydaburg and is the natural resource director for the Hydaburg Cooperative Association. He is responsible for overseeing the entire project with technical assistance from the co-investigator.

Local residents will be hired to run the field portion of the project. Technical capacity will be built through training local residents while sampling capacity will be built through project equipment purchases, replacement and upkeep. The budget is above average for similar projects in Southeast Alaska but reasonable considering the work to be completed and products delivered.

TRC Ranking: 3 (tied)

Project Number: 18-609

Project Title: Sitkoh Lake Sockeye Salmon Stock Assessment

Project Justification: Ben Van Alen, fish biologist for the USFS, proposes to continue a Sockeye Salmon stock status and trends project at Sitkoh Lake in partnership with Raynelle Jack of the Angoon Community Association. They will count Sockeye Salmon and other species of fish migrating into Sitkoh Lake using two underwater video-equipped net weirs. Sitkoh Lake is near the junction of Chatham and Peril Straits on the southern end of Chichagof Island and is located within the exterior boundaries of the Tongass National Forest. Sitkoh Lake Sockeye Salmon are harvested by Federally qualified subsistence

users mostly from Angoon and primarily in State-managed marine waters. This project addresses a 2018 priority information need identified by the Southeast Alaska Subsistence Regional Advisory Council and was included in the 2018 Notice of Funding Opportunity, namely: **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 Virginia Lake.**

This would be a continuation of a project funded in some form through the Monitoring Program from 2001-2006 and since 2010. The investigation plan for this project has not changed substantially from past Monitoring Program funding cycles and aside from a few suggestions, the objectives and methods are clear and measurable. The investigators have a good record of satisfactorily completing several Monitoring Program projects and submitting timely deliverables. The co-investigator is a local community organization that will be responsible for contract administration and overseeing the field component of the project with technical assistance from USFS partners. Local residents will be hired and receive training from USFS staff on project implementation and safety, including how to sample fish and how to operate video weir, computer, networking, and solar power systems. No letters of support have been received for this project.

The budget is reasonable considering the work to be completed and products delivered. However, due to sharing of personnel and transportation, completion of this project within the outlined budget is contingent on the Kook Lake project being funded.

TRC Ranking: 3 (tied)

Project Number: 18-602

Project Title: Falls Lake Subsistence Sockeye Salmon Stock and Harvest Assessment

Project Justification: This project proposes to use a mark-recapture study and a video net weir to estimate the escapement of Sockeye Salmon into Falls Lake; collect age, sex and length data; and estimate the subsistence harvest of Sockeye Salmon from the system. Falls Lake is the most important Sockeye system for the residents of Kake, and was among the systems identified by the Council where reliable estimates of escapement and harvest are a priority information need: “**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 Virginia Lake.**” The Falls Lake watershed is entirely within the Tongass National Forest.

The methods proposed have been used successfully in this project for a number of years, and the investigators have a track record of successfully meeting the project’s objectives. The mark-recapture component would provide for a validated weir count, which is ideal, but using swim-through redundant video weirs would likely be more fish-friendly without compromising data integrity. The logistical challenges of the remote site have already been successfully met in previous years. The proposal is a

continuation of a Monitoring Plan-funded project that has been in place for 14 of the last 16 years. In previous years of the study, investigators found that returns to the terminal area are highly variable, and that a substantial portion of the return can be harvested in the subsistence fishery.

The co-investigator agency is the tribal organization in the community that traditionally uses Falls Lake Sockeye. They play a meaningful role by providing administrative and logistical support, hiring technicians from the local community, and providing local knowledge and input on community issues. This successful partnership provides a way for the community to play a role in the project and decision making in management of the subsistence fishery. No letters of support were included, but the tribe is a partner in the project.

The costs of the project are realistic and in line with similar projects in the area. The majority of the costs are for personnel and transportation to and from the study site.

TRC Ranking: 3 (tied)

Project Number: 18-603

Project Title: Gut Bay Subsistence Sockeye Salmon Stock and Harvest Assessment

Project Justification: This proposal is to start a new project to estimate the escapement and harvest of Gut Bay Sockeye Salmon, which is one of several systems used by residents of Kake. While there is some history of monitoring, information about the abundance and harvest of Gut Bay Sockeye is limited. This stock was among those identified by the Southeast Alaska Council where estimates of escapement and harvest are a priority information need: “***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 Virginia Lake.***” The Gut Bay watershed is entirely within the Tongass National Forest.

The project’s objectives are clear and achievable, and the proposed methods have been proven at a number of other sites. A pair of video net weirs will be placed in a pond on the outlet stream of Gut Bay Lake. Fish will be trapped and marked at the lower weir, and the upper weir will be used to sample for marks. The net weirs will provide a minimum escapement number from video counts, which can be validated by the mark-recapture estimate. Scale sampling from fish caught in the trap will be used to estimate the age, sex and length composition of the run. The subsistence harvest will be estimated using an onsite survey.

The methods proposed have been used successfully at nearby Falls Lake for a number of years, and the investigators have a track record of successfully meeting the project’s objectives. The use of mark-recapture in conjunction with redundant video weirs provides for a validated weir count, which is ideal, but using swim-through redundant video weirs would be more fish-friendly while still providing a good estimate of escapement. There will be significant logistical challenges due to the inclement weather,

remote site, and the restrictions of working in a designated wilderness area. The investigators have successfully operated another project under similar conditions at Falls Lake.

The co-investigator agency is the tribal organization in the community that traditionally uses Gut Bay Sockeye. They play a meaningful role by providing administrative and logistical support, hiring technicians from the local community, and providing local knowledge and input on community issues. This successful partnership provides a way for the community to play a role in the project and decision making in management of the subsistence fishery. No letters of support were included, but the local village organization is a partner in the project.

The costs of the project are realistic and in line with similar projects in the area.

TRC Ranking: 4

Project Number: 18-607

Project Title: Neva Lake Sockeye Salmon Stock Assessment

Project Justification: The investigators propose four years of Sockeye Salmon stock assessment at Neva Lake. The Neva Lake watershed is located within the Tongass National Forest. Sockeye Salmon returning to Neva Lake are used by Federally qualified subsistence users primarily from Hoonah, Gustavus and Excursion Inlet. For these communities this is the most accessible source of Sockeye Salmon. Most Sockeye Salmon harvest occurs in the State of Alaska managed marine waters adjacent to Neva Creek while some Sockeye Salmon are harvested in Neva Creek under Federal jurisdiction. Sockeye Salmon escapement estimates at Neva Lake has been consistently identified as a priority information need by the Southeast Alaska Subsistence Regional Advisory Council for many years and was included in the 2018 Notice of Funding Opportunity, namely; ***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 Virginia Lake.***

This cooperative project between the USFS and the Hoonah Indian Association would be a continuation of the Sockeye Salmon stock status and trends project funded through the Monitoring Program since 2002. Sockeye Salmon escapement used to be estimated by traditional weir and mark-recapture studies but have evolved over the years into the proposed remote underwater video monitoring. A single video chute will allow Sockeye Salmon and other species to pass a double picket weir system designed to boost confidence in the final count. Motion triggered video will be sent via wireless link to the crew quarters in Excursion Inlet where it will be recorded and reviewed by the crew. This technique was used successfully last year at this site and at other Monitoring Program sites.

Information from the first few years of the project led to higher subsistence harvest limits. Subsequent information generated by the project led to harvest limits being lowered in response to decreasing annual escapements coupled with increasing subsistence effort. This project would provide additional annual

escapement counts and biological information about the population that is useful for management of the fishery. The objectives are clear, measurable and achievable and the investigators have a proven ability to complete Monitoring Program projects on time with satisfactory deliverables.

The community of Hoonah is a co-investigator and has a direct dependence on Neva Lake for their subsistence Sockeye Salmon needs. This organization would continue their meaningful role in accomplishing the objectives of this project and several local fisheries technicians would be employed. Any new local seasonal hires will be provided extensive training in fisheries, computer and safety techniques.

The cost of this project is above average compared to similar projects in Southeast Alaska funded through the Monitoring Program. One of the benefits of remote monitoring is the elimination of the need to keep a field camp and expensive travel to the project site. Although remote monitoring also comes with additional expenses, the cost of this project could be reduced in subsequent years as it will be fully converted to remote monitoring.

TRC Ranking: 5

Project Number: 18-606

Project Title: Kook Lake Sockeye Salmon Stock Assessment

Project Justification: Ben Van Alen, fish biologist for the USFS, proposes to lead a Sockeye Salmon stock status and trends project at Kook Lake in partnership with Raynelle Jack of the Angoon Community Association. This would be a continuation of a project funded in some form through the Monitoring Program from 2005-2007 and since 2010. The escapement has fluctuated annually since 2005 and appears to be correlated with commercial purse seine effort in the Sockeye Salmon migration corridor of Icy and Chatham Straits. Kook Lake is an important source of Sockeye Salmon for the community of Angoon particularly when the returns to Kanalku Lake are poor.

This project addresses a 2018 priority information need identified by the Southeast Alaska Subsistence Regional Advisory Council and was included in the 2018 Notice of Funding Opportunity, namely: ***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 Virginia Lake.*** Sockeye Salmon escapement data collected from Kook Lake has been useful in documenting trends and aiding management of the commercial purse seine fishery in Icy and Northern Chatham Straits.

The investigation plan for this project has not changed substantially from past Monitoring Program funding cycles and aside from a few suggestions, the objectives and methods are clear and measurable. The investigators have a good record of satisfactorily completing several Monitoring Program projects and submitting timely deliverables. The co-investigator is a local community organization that will be responsible for contract administration and overseeing the field component of the project with technical

assistance from USFS partners. Local residents will be hired and receive training from USFS staff on project implementation and safety, including on how to run a video weir system, how to sample fish for biological information, and how to operate remote video monitoring equipment. No letters of support have been provided for this project.

The budget is reasonable considering the work to be completed and products delivered. This project will also serve as a proving ground for remote monitoring technology that has been successfully used at other Monitoring Project locations. If the test is successful it could be implemented in subsequent years and lower the cost of this and other projects.

TRC Ranking: 6

Project Number: 18-600

Project Title: Alecks Creek Subsistence Sockeye Salmon Stock and Harvest Assessment Southeast Alaska

Project Justification: This project proposes to use video net weirs to estimate the escapement of Sockeye Salmon into Alecks Lake; collect age, sex and length data; and estimate the subsistence harvest of Sockeye Salmon from the system. Alecks Creek was among the systems identified by the Council where reliable estimates of escapement and harvest are a priority information need. Little is currently known about escapement and harvest at the system, and reported harvest has ranged from 2 to 274 fish per year. This project addresses the Council's priority information need for "*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 Virginia Lake.*"

The methods proposed have been proven at other similar projects throughout the region, and the investigators have a track record of successfully completing similar projects. The mark-recapture component would provide for a validated weir count, which is ideal, but using swim-through redundant video weirs would likely be more fish-friendly without compromising data integrity. The harvest monitoring component would improve on permit-based data with a known record of under-reporting. The site may pose some logistical challenges, as the lake and weir site is 3.5 km upstream from the planned camp near the beach, and the site's wilderness designation may also complicate logistics.

The investigators include the local tribe, and the project would continue and enhance the meaningful role that local residents play in management of local Monitoring Fund projects. The tribe's staff will hire local technicians to do field work for the project, as well as provide administrative and logistical support. They will also provide local knowledge and input on community issues. No letters of support were included, but the local village organization is a partner in the project.

TRC Ranking: 7

Project Number: 18-608

Project Title: Sarkar Sockeye Salmon Stock and Harvest Assessment

Project Justification: This cooperative project between the Craig Tribal Association and the USFS seeks to count Sockeye Salmon migrating into the upper Sarkar watershed with two video equipped net weirs and to survey the rest of the system to determine if any significant numbers of Sockeye Salmon spawn elsewhere. This project will provide new information on a Sockeye Salmon stock important to Federally qualified subsistence users on Prince of Wales Island. The Sarkar Lake watershed is located within the Tongass National Forest. Some subsistence Sockeye Salmon are caught in the Federal fishery while most subsistence harvest occurs in State managed marine waters in Sarkar Cove. Escapement and harvest assessments for the Sarkar Lake Sockeye Salmon stock were included in the 2018 Notice of Funding Opportunity, namely: ***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 Virginia Lake.***

This project will provide new information on the status of the Sarkar Sockeye Salmon stock which is important to Federally qualified subsistence users on Prince of Wales Island. This is a high priority project in the Southeast Alaska region due to the scarcity of data coupled with the possibility of higher future effort shifted from the Klawock Lake fishery due to stock decline and management restrictions. Also, subsistence Sockeye Salmon harvest from the Sarkar stock reported to the state has declined dramatically since 2012. A stock assessment could provide information to address this decline in subsistence harvest.

The objectives and methods outlined in the investigation plan are clear, measurable and achievable and have been used successfully at other Monitoring Program projects. As a first-time Monitoring Program investigator, the Craig Tribal Association would be responsible for implementing this project with guidance of USFS biologists. Local residents will be targeted when filling four fisheries positions responsible for execution of the field component. These field technicians will be trained by the investigators and develop valuable skills that could be used on future projects. Resumes were not included for Craig Tribal Association investigators. No letters of support were provided for this project.

The cost of this project is low compared to similar Monitoring Program projects and may not be adequate to meet the objectives. The first year cost is significantly higher due to the initial costs associated with building sampling capacity. No budget justification was received.

TRC Ranking: 8

Project Number: 18-612

Project Title: Kanalku Lake Subsistence Sockeye Salmon Stock Assessment

Project Justification: This cooperative project between the ADF&G, the Angoon Community Association and the USFS would be a continuation of the Sockeye Salmon stock status and trends project

initiated in 2001. The investigators plan to continue operating a weir to count Sockeye Salmon entering Kanalku Lake and collect biological information from Sockeye Salmon captured on the spawning grounds. The Kanalku watershed is located within Admiralty Island National Monument. Sockeye Salmon returning to Kanalku Lake are harvested by Federally qualified subsistence users living in Angoon. The subsistence fishery occurs primarily in the State of Alaska managed waters at the marine terminal area of Kanalku Lake. Sockeye Salmon escapement estimates at Kanalku Lake has been consistently identified as a priority information need by the Southeast Alaska Subsistence Regional Advisory Council for many years and was included in the 2018 Priority Information Needs, namely, ***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 Virginia Lake.***

The community of Angoon is a co-investigator and has direct dependence on Kanalku Lake for their subsistence Sockeye Salmon. This is a high priority project in Southeast Alaska due in part to the interception of Sockeye Salmon destined for Kanalku Lake in the commercial purse seine fishery in Northern Chatham and Icy Straits. This project would provide additional escapement counts and biological information useful for fisheries management. The objectives are clear and measurable with a few suggestions for modification. The investigators have a proven ability to complete Monitoring Program projects on time with satisfactory deliverables.

The Angoon Community Association would continue their meaningful role in accomplishing the objectives of this project and local fisheries technicians would be employed. The Angoon Community Association will build on existing technical capacity to carry out fisheries related projects. Any new local seasonal hires will be provided extensive training in fisheries, computer and safety techniques. The USFS has a small role providing technical advice concerning the use of underwater video systems to monitor salmon escapements.

Although this is a high priority project, the high cost is not representative of the projected outcomes in comparison with similar projects in Southeast Alaska funded through the Monitoring Program. It appears the budget could be significantly smaller without sacrificing project objectives and safety.

TRC Ranking: 9

Project Number: 18-605

Project Title: Klawock Lake Sockeye Salmon Population Assessment

Project Justification: This project proposes to estimate the escapement of Sockeye Salmon into Klawock Lake, using the existing weir. Klawock River Sockeye Salmon are heavily used by Federally-qualified subsistence users in Craig and Klawock, and has experienced a recent decline in both abundance and subsistence harvest. The Klawock Lake sockeye run has historically been much larger, but has since been degraded. There have been several regulatory actions in recent years intended to address declining

returns. There is also a long history of stock assessment for this system, including several past projects funded under the Monitoring Plan.

This project addresses the Council's priority information need for "***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 Virginia Lake.*** The Klawock Lake watershed is within the Tongass National Forest. The existing weir is part of the Klawock Hatchery, which is operated by the Southern Southeast Regional Aquaculture Association (SSRAA).

The principal investigators have a track record of successfully conducting the activities outlined in the proposal. The project would provide a fisheries technician to assist SSRAA staff with fish passage and counting activities, and a USFS biologist responsible for project management, data analysis, and report writing. The Klawock Cooperative Association is a partner in the study. Their role is limited to providing a fisheries technician and administrative support. There will be some limited capacity building from on-the-job experience, but there is little meaningful involvement in project management and design. No additional local equipment or logistical capacity will be developed. The investigation plan states that the local Native organizations have been consulted and are in support of the project, but no letters of support were included.

The project takes advantage of the existing weir infrastructure to provide extremely affordable escapement monitoring, compared to other systems. However, the estimates are unvalidated, so fish would be undercounted if any breaks in the weir or other issues occur, and any such undercounting would be undetectable. The addition of a modest mark-recapture component to the project would allay those concerns for relatively little additional effort and expense.

TRC Ranking: 10

Project Number: 18-611

Project Title: Northern Southeast Alaska Eulachon Population Dynamics Monitoring

Project Justification: This proposal is to develop a monitoring program for Northern Southeast Alaska Eulachon, and form a working group for community-based adaptive management. Eulachon in northern Southeast Alaska have been used as a subsistence resource for generations, and represent a considerable portion of the overall harvest of fish in the area. Eulachon fisheries in nearby regions have collapsed, leading to the closure of traditional subsistence fisheries. However, the stock status of northern Southeast Alaska Eulachon populations was not identified as a priority information need by the Council. The study sites include both Federal and non-Federal lands, which may conflict with the Monitoring Plan requirements.

Several methods will be tested to measure Eulachon abundance at systems throughout the Lynn Canal area, and the best methods for each system will be selected based on a cost-benefit analysis. The

proposed methods include both conventional (mark-recapture, larval outdrift, and catch-per-unit-effort) and experimental methods (eDNA). The use of eDNA is an emerging science, but tests have proven promising. The proposed working group objective is an admirable goal to include all stakeholders in management of Eulachon, but the specific structure and function of the planned group is only vaguely described. It does not include any discussion of how such a group would actually take part in management decisions, or what responsibilities and authority the group would have.

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. Information sharing among the stakeholders is a goal of the study, as well as collection of traditional ecological knowledge, but the plan for integrating TEK into the project was not clear. None of the investigators appear to have formal cultural anthropology experience, which would be crucial in effectively integrating TEK into the project. A letter of support from the Skagway Traditional Council was included.

The expenses for the project are reasonable and well-planned, but the overall cost is high due to its ambitious scope. The project involves a large number of personnel as well as travel to remote areas, which increases the expense. There are considerable matching funds from a variety of sources, especially in the first year.

TRC Ranking: 11
Project Number: 18-601
Project Title: District 1 Eulachon Population Assessment

Project Justification: This project would allow local biologists to continue monitoring the status of the Behm Canal Eulachon population, which has traditionally been an important subsistence resource, but has been closed to fishing for years. Any future fishery would be dependent on obtaining information on Eulachon stock status. This population has been at critically low levels, and the reasons for its collapse are poorly understood. The collapse of the subsistence fishery has led the Council to identify the development of escapement indices for Unuk Eulachon to be a priority information need: “*Escapement indexes for Eulachon at the Unuk River and the Yakutat Forelands.*” In addition, the most recent annual report letter to the Federal Subsistence Board chairman listed the Unuk Eulachon fishery to be a specific concern.

The project uses a combination of remote sensing and field surveys to document the biomass and spawning locations of Eulachon. Live views from satellite cameras will be used to observe spawning locations for indications of the presence of Eulachon, such as birds or other predators. When activity is seen, field crews will travel to the site to conduct surveys. While the methods proposed will not provide a precise population estimate, they should document the location and relative abundances of spawning Eulachon at the survey sites, as well as basic information such as age-weight-length, sex, and egg deposition. This is probably sufficient for monitoring purposes, and obtaining a statistically rigorous assessment would require far greater resources than budgeted for this project. In the past, the timing of

surveys during a season of challenging weather has been an impediment. The use of satellite cameras to remotely monitor for signs of Eulachon presence will help maximize the effectiveness of surveys and minimize the costs.

The investigators both have experience conducting Monitoring Plan projects, including the previous Eulachon monitoring efforts. All staff working on this project are USFS employees, and no tribal or rural community members are identified as working on the project. There does not appear to be any significant capacity building component of the project. The proposal states that the project was developed in consultation with local tribal organizations, and information from the project will be shared with them. However, no letters of support were included.

The budgeted cost of the project is very reasonable, though the budget is somewhat vague in some areas. The use of remote monitoring to maximize the benefit of onsite field work helps maximize the effectiveness of expensive travel to a remote location. It's not clear from the proposal how many field trips per year are planned, but the budget appears to be sufficient for several trips. There is no money allocated for replacement or upgrade of the satellite cameras, which are likely quite expensive and prone to failure.

APPENDIX A

Table A. 1. Fisheries Resource Monitoring Program projects funded in the Southeast Region from 2000 to 2016.

Project Number	Project Title	Investigators
<i>Estimation of Sockeye Salmon Escapement</i>		
00-043	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
00-044	Falls Lake Sockeye Salmon Stock Assessment	ADF&G, OVK
00-045	SE Tribes Traditional Subsistence Territory Mapping	USFS
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 Esc Index	ADF&G, WCA
01-128	Klag Bay Sockeye Salmon Stock Assessment	ADF&G, STA, USFS
01-130	Hetta Lake Sockeye Salmon Stock Assessment	ADF&G, HCA
01-175	Salmon Lake Sockeye and Coho Salmon Stock Assessment	ADF&G, STA, NSRAA, USFS
01-179	Virginia Lake Sockeye Salmon Assessment	USFS
02-012	Neva and Pavlof Sockeye Salmon Stock Assessment	USFS, HIA
02-017	Redfish Bay Sockeye Salmon Stock Assessment	STA, ADF&G, USFS
03-007	Eek Lake Sockeye Salmon Stock Assessment	HCA, ADF&G
04-604	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA
04-605	Kanalku, Sitkoh Lakes Sockeye Salmon Stock Assessment	ADF&G, ACA
04-606	Hetta Lake Sockeye Salmon Stock Assessment	ADF&G, HCA
04-607	Falls, Gut, Kutlaku Subsistence Sockeye Stock Assessment	AD&F&G, OVK
04-608	Salmon Lake Sockeye Salmon Stock Assessment	STA
04-609	Klag Bay Sockeye Salmon Stock 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	Kutlaku Lake Sockeye Salmon Assessment	ADF&G, OVK
07-601	Hatchery Creek Sockeye Salmon Assessment	OVK, USFS
07-606	Hetta Lake Sockeye Salmon Assessment	ADFG
07-607	Kanalku Lake Sockeye Salmon Assessment	ADF&G, ACA
07-608	Klawock Lake Sockeye Salmon Assessment	ADF&G, KCA

Continued on next page

Table A.1 continued

Project Number	Project Title	Investigators
Estimation of Sockeye Salmon Escapement		
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
10-603	Yakutat Eulachon Surveys	USFS, YSB, ADF&G
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 Stock Assessment	USFS, ADF&G
14-602	Falls Lake Subsistence Sockeye Salmon Stock and 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	USFS, KCA, POWHA
14-608	Kanalku L Subsistence Sockeye Salmon Assessment	ADF&G, ACA, USFWS
14-609	Klag Lake Sockeye Salmon Assessment	STA
14-610	Kook Lake Sockeye Salmon Stock Assessment	USFS, ACA
14-611	Sitkoh Lake Sockeye Salmon Stock Assessment	USFS, ACA
14-612	Neva Lake Sockeye Salmon Stock Assessment	USFS, HIA
16-604	Eek Lake Sockeye Salmon Stock Assessment	USFS, HIA
Documentation of Subsistence Use Patterns for Salmon		
00-045	SE Tribes Traditional Subsistence Territory Mapping	USFS
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

Continued on next page

Table A.1 continued

Project Number	Project Title	Investigators
Documentation of Subsistence Use Patterns for Salmon		
02-038	SE Subsistence Fisheries GIS Database Development	ADF&G, CCTHITA, TST
02-049	Wrangell Salmon Subsistence Harvest Use Pattern	ADF&G, WCA, USFS
02-104	Hoonah and Klawock Salmon Survey	ADF&G, CCTHITA, TST
03-651	Klawock River Subsistence Steelhead Harvest and Use Pattern	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 in Seafood a	CCTHITA
07-651	Hydaburg Sockeye Salmon Customary and Traditional System	HCA, UAA
08-651	Maknahti Island Subsistence Herring Fishery Assessment	STA, PSU
Prince of Wales Island Steelhead		
01-105	POW Island Steelhead/Rainbow Trout Harvest Use Pattern	ADF&G,
05-604	Prince of Wales Steelhead Assessment	ADF&G, OVK
08-650	POW Island Steelhead Trout Subsistence Harvest Survey	OVKa, HCA, BIA, USFWS
Estimation of Non-salmon Species		
07-610	Behm Canal Eulachon Genetics	USFWS
08-607	Unuk River Eulachon Assessment	USFS
14-607	Unuk River Eulachon	USFS

Abbreviations used are: **ACA** = Angoon Community Association, **ADF&G** = Alaska Department of Fish and Game, **BIA** = Bureau of Indian Affairs, **CCTHITA** = Central Council of Tlingit & Haida Indian Tribes of Alaska, **HCA** = Hydaburg Cooperative Association, **HIA** = Hoonah Indian Association, **KCA** = Klawock Cooperative Association, **KECS** = Kai Environmental Consulting Services, **NSRAA** = Northern Southeast Aquaculture Association, **OVK** = Organized Village of Kake, **OVKa** = Organized Village of Kasaan, **POWHA** = Prince of Wales Hatchery Association, **PSU** = Portland State University, **STA** = Sitka Tribe of Alaska, **TST** = Third Sector Technologies, **UAA** = University of Alaska Anchorage, **USFS** = USDA Forest Service, **USFWS** = USDOJ Fish and Wildlife Service, **WCA** = Wrangell Cooperative Association, **YSB** = Yakutat Salmon Board, and **YTT** = Yakutat Tlingit Tribe.

APPENDIX B

The following abstracts were written by the Principal Investigators and submitted to the Office of Subsistence Management as part of the proposal package. The statements and information contained in the Abstracts were not altered and may not reflect the opinions of the Office of Subsistence Management and/or the TRC.

Project Number: 18-600
Title: Alecks Creek Subsistence Sockeye Salmon Stock and Harvest Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Robert Cross, USDA Forest Service Tongass National Forest
Co-Investigator(s): Dawn Jackson, Organized Village of Kake (OVK)

Project Cost:	2018: \$152,865	2019: \$116,352	2020: \$118,981	2021: \$121,681
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Total Cost: \$509,879

Issue: Alecks Creek is located on Kuiu Island and once supplied the *Tlingit* villages within Tebenkof Bay with Sockeye Salmon. However, there has been no documented effort to study the demographics, magnitude, or timing of the Sockeye Salmon run in Alecks Creek. Harvest reported on subsistence harvest permits suggest that harvest effort on the system is variable and generally low. The low harvest may be due to the long travel required to access the system paired with the low harvest limits of Alecks Creek. With the current lack of reliable information managers must manage the fishery more conservatively (i.e. lower harvest limits and a shorter season), which could be resulting in lost harvest opportunity for users. Data generated by a monitoring project would allow for maximized subsistence harvest opportunity while protecting a source of Sockeye Salmon for the area.

Objectives:

1. Estimate the escapement of Sockeye Salmon into Alecks Lake with a coefficient of variation \leq 15%.
2. Estimate the age, sex and length distribution of Sockeye Salmon in the Alecks Creek escapement with a coefficient of variation \leq 10% for each age class estimate.
3. Estimate the subsistence harvest of Sockeye Salmon in the marine terminal area of Alecks Creek with a coefficient of variation \leq 15%.

Methods: The annual escapement of Sockeye Salmon into Alecks Creek will be counted using double redundant net weirs equipped with motion activated underwater video cameras that will produce a minimum escapement count. Escapement will also be estimated using simple mark-recapture techniques. Sockeye Salmon will be marked at a floating fish trap attached to the downstream weir and released below the upstream weir that spans the entrance of the lake. The upstream weir video will be reviewed for marked fish and an estimate will be generated using the Peterson pooled model.

Sockeye Salmon will be sampled at the trap for sex, length, and scales to describe the biological structure of the escapement. A calculated minimum sample size will be used to meet the precision goal. Sockeye Salmon will be sampled in proportion to the run in an attempt to minimize potential bias due to fluctuating run activity. Morphology of the head and jaw will be examined to determine sex, and length will be measured from mid-eye to tail fork to the nearest millimeter. Three scales will be taken from the preferred area and sent to the ADF&G for age analysis.

The marine terminal area of Alecks Creek will be monitored to assess the subsistence harvest. The area will be monitored daily throughout the season in an attempt to interview all harvesters, resulting in a harvest census. In the event that interviews were missed the total harvest will be estimated using direct expansion techniques. Harvest occurring prior to our arrival each year will be obtained from ADF&G permits.

Partnerships/Capacity Building: The USFS staff will provide general project oversight, sample design and analysis, reporting, budget management, and proposal development. The OVK staff will provide input on community issues, natural resource issues, and future direction of the project, employ field technicians, provide the camp, and manage a budget for personnel, supplies, and logistical support (e.g., transportation). The partnership between OVK and the USFS has led to the ongoing success of other Sockeye Salmon monitoring projects in the area.

Project Number: 18-601
Title: District 1 Eulachon Population Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Jeff Reeves, Craig Ranger District, US Forest Service (USFS)
Co-Investigator(s): Jon Hyde, Ketchikan/Misty Fjords Ranger District, USFS

Project Cost:	2018: \$40,264	2019: \$ \$41,502	2020: \$ 42,806	2021: \$\$44,173
Total Cost: \$ 168,745				

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.

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 closed by both State and Federal managers due to poor eulachon returns.

The majority of the harvest in District 1 has occurred in the lower stretches of the Unuk River with very little documentation of harvest from the other listed locations. Although prior to 2001, historical eulachon harvest had taken place under commercial regulations, the subsistence fishery under Federal management is just as important in the eyes of the subsistence user as provisions allow for customary trade of the resource. The primary purpose of this harvest has been to distribute eulachon to the communities of Saxman, Metlakatla, Ketchikan and other outlying areas. Due to the great distance of the Unuk River from these communities, local users depended on the commercial harvesters for their yearly eulachon. The ADFG division of subsistence documented in 1987 that 27% of residents in the rural community of Metlakatla utilize eulachon.

Objectives:

1. Document daily predator activity through satellite internet video or still photos to reveal for presence/absence of eulachon.
2. Document biomass and spawning locations of eulachon in the Unuk River, Chickamin, Klahini, Wilson, Blossom Rivers and in Carroll Inlet/Carroll Creek.
3. Conduct age-weight-length (AWL) measurements along with sex of collected samples.
4. Document harvest methods, harvest levels, and run timing by on-site observations.
5. 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 will travel to eulachon research council meetings to share and obtain new information.

Methods: (1) Satellite internet video equipment will be used to provide managers a “desk top” update of the daily conditions at identified locations of eulachon returns. If video is not possible due to the remoteness of the Unuk, a daily series of still photographs would be utilized. (2) Estimates of biomass will be obtained through on the ground and aerial surveys. (3) If possible, length and sex samples will be taken from eulachon returns for analysis. (4) Harvest estimates will be gathered if fishery is not closed. (5) 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 SERAC, 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.

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. Members of the Metlakatla Indian Community, Organized Village of Saxman, and the Ketchikan Indian Community 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.

Project Number: 18-602
Title: Falls Lake Subsistence Sockeye Salmon Stock and Harvest Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Robert Cross, USDA Forest Service Tongass National Forest
Co-Investigator(s): Justin Koller, USDA Forest Service Tonagass National Forest and Dawn Jackson, Organized Village of Kake (OVK)

Project Cost:	2018: \$123,900	2019: \$ 118,657	2020: \$ 121,420	2021: \$124,264
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Total Cost: \$488,241

Issue: Sockeye Salmon returning to the marine terminal area at Falls Lake are heavily utilized by residents of Kake, Alaska in a subsistence fishery occurring as early as mid-June and lasting through August. In the years 2001-2016 an estimated 1,745-10,307 Sockeye Salmon returned to the marine terminal area and approximately 15-70% of these fish were harvested in the subsistence fishery. In the same period, an estimated 750-8,800 Sockeye Salmon migrated into Falls Lake to spawn. Annual stock assessments are essential due to the high variability of annual terminal abundance coupled with the potential for high exploitation. Without an assessment of Sockeye Salmon abundance and subsistence harvest, managers would be forced to manage the fishery more conservatively (i.e., lower harvest limits and a shorter season), which could result in lost harvest opportunity for users.

Objectives:

1. Estimate the escapement of Sockeye Salmon into Falls Lake with a coefficient of variation \leq 15%.
2. Estimate the age, sex and length distribution of Sockeye Salmon in the Falls Lake escapement with a coefficient of variation \leq 10% for each age class estimate.
3. Estimate the subsistence harvest of Sockeye Salmon in the marine area around Falls Lake Creek with a coefficient of variation \leq 15%.

Methods: The annual escapement of Sockeye Salmon into Falls Lake will be estimated using simple mark-recapture techniques. Sockeye Salmon will be marked at the top of the fish pass and released below a net weir, equipped with motion activated underwater video cameras, that spans the entrance of the lake. The video will be reviewed for marked fish and an estimate will be generated using the Peterson pooled

model. In the event of equipment failure or suspected bias fish will be sampled for marks on the spawning grounds. Sockeye Salmon will be sampled at the trap for sex, length and scales to describe the biological structure of the escapement. A calculated minimum sample size will be used to meet the precision goal. Sockeye Salmon will be sampled in proportion to the run in an attempt to minimize potential bias due to fluctuating run activity. Morphology of the head and jaw will be examined to determine sex and length will be measured from mid-eye to tail fork to the nearest millimeter.

The marine terminal area of Falls Lake creek will be monitored to assess subsistence harvest. The area will be monitored daily throughout the season in an attempt to interview all harvesters resulting in a harvest census. In the event that interviews were missed the total harvest will be estimated using direct expansion techniques.

Partnerships/Capacity Building: Dialog between OVK leaders, USFS and ADF&G fisheries management biologists has contributed to proactive management of the Falls Lake fishery. Our partners at OVK have been consulted about this investigation plan and have demonstrated support for continuing the monitoring project. The principal investigator will provide general project oversight, sample design and analysis, reporting, budgets, and proposal development. Staff at OVK will work to provide input on community issues, natural resource issues, and future direction of the project, employ field technicians, provide the camp and manage a budget for personnel, supplies, and services such as transport.

Project Number: 18-603
Title: Gut Bay Subsistence Sockeye Salmon Stock and Harvest Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Robert Cross, USDA Forest Service Tongass National Forest
Co-Investigator(s): Justin Koller, USDA Forest Service Tonagass National Forest and Dawn Jackson, Organized Village of Kake (OVK)

Project Cost:	2018: \$153,100	2019: \$116,329	2020: \$ 118,696	2021: \$121,128
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Total Cost: \$509,253

Issue: Gut Bay is a crucial source of Sockeye Salmon for the community of subsistence harvesters located in Kake. However, very little is known about the magnitude, timing, or seasonal variation of Sockeye Salmon escapement in the Gut Bay system. Data generated by a monitoring project would support informed management decisions which would allow for maximized subsistence harvest opportunity while protecting a major source of Sockeye Salmon for the area. The current escapement record at Gut Bay is composed of sporadic and unstandardized aerial, boat, and foot surveys. Furthermore, the subsistence harvest record relies on self-reporting which has consistently been shown to under report harvest. With this current lack of reliable information managers must manage the fishery more conservatively (i.e., lower harvest limits and a shorter season), which could be resulting in lost harvest opportunity for users.

Objectives:

1. Estimate the escapement of Sockeye Salmon into Gut Bay Lake with a coefficient of variation \leq 15%.
2. Estimate the age, sex and length distribution of Sockeye Salmon in the Gut Bay escapement with a coefficient of variation \leq 10% for each age class estimate.
3. Estimate the subsistence harvest of Sockeye Salmon in the marine area within Gut Bay with a coefficient of variation \leq 15%.

Methods: The annual escapement of Sockeye Salmon into Gut Bay will be counted using double redundant net weirs, equipped with motion activated underwater video cameras, to produce a minimum escapement count. Escapement will also be estimated using simple mark-recapture techniques. Sockeye Salmon will be marked at a floating fish trap attached to the downstream weir and released below the upstream weir that spans the entrance of the lake. The video will be reviewed for marked fish and an estimate will be generated using the Peterson pooled model. Sockeye Salmon will be sampled at the trap for sex, length, and scales to describe the biological structure of the escapement. A calculated minimum sample size will be used to meet the precision goal. Sockeye Salmon will be sampled in proportion to the run in an attempt to minimize potential bias due to fluctuating run activity. Morphology of the head and jaw will be examined to determine sex and length will be measured from mid-eye to tail fork to the nearest millimeter. Three scales will be taken from the preferred area and sent to the ADF&G for age analysis.

The marine terminal area of Gut Bay will be monitored to assess subsistence harvest. The area will be monitored daily throughout the season in an attempt to interview all harvesters resulting in a harvest census. In the event that interviews were missed the total harvest will be estimated using direct expansion techniques.

Partnerships/Capacity Building: The USFS staff will provide general project oversight, sample design and analysis, reporting, budget management, and proposal development. The OVK staff will provide input on community issues, natural resource issues, and future direction of the project, employ field technicians, provide the camp, and manage a budget for personnel, supplies, and logistical support (e.g., transportation). The partnership between OVK and the USFS has led to the ongoing success of other Sockeye Salmon monitoring projects in the area.

Project Number: 18-604
Title: Hetta Lake Subsistence Sockeye Salmon Stock Assessment Project
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Anthony Christianson, Hydaburg Cooperative Association
Co-Investigator(s): Cathy Needham, Kai Environmental Consulting Services

Project Cost:	2018: \$172,034	2019: \$ 173,840	2020: \$ 166,616	2021: \$166,616
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Total Cost: \$ 679,106

Issue:

HCA is proposing to continue work on assessing the subsistence harvest and escapement of sockeye salmon into Hydaburg’s most important subsistence system, Hetta Lake. This information will continue to allow HCA and resource management agencies to monitor actual harvest in Hetta, and compare the percentage of harvest back to escapement estimates in order to manage the system in-season more accurately.

Objectives:

1. Census the sockeye salmon harvest by subsistence fishers in the terminal areas of Hetta, Eek, Kasook, and Hunter Bay using completed-trip interviews of all fishers on the fishing grounds or immediately upon returning to Hydaburg from the fishing grounds.
2. Count the number of sockeye salmon and other salmon species returning to Hetta Lake through a bipod weir.
3. Estimate the age composition of the sockeye escapement so that the coefficient of variation is 10% or less for the two major age classes and describe the size distribution of each age class by sex.
4. Document the sockeye spawning each season through adult foot counts

Methods:

Each year, crew members will monitor the subsistence grounds, and interview all fishers once their harvest for the day is complete. Information collected during each interview will include catch by species and other relevant information. A channel spanning bipod weir will be constructed on the outlet stream of Hetta Lake, with a trap constructed to capture fish migrating upstream to spawn. The weir will operate from June through September of each year, and all fish crossing the weir will be identified and counted. Approximately 600 fish will be sampled for age, sex and length data. Fish will be measured and sexed on site. Scales will be removed and sent to ADFG to be read to determine age. Data will be analyzed to estimate the spawning population of sockeye. Adult foot counts in stream spawning areas will document spawning areas and numbers of sockeye using stream systems. Weekly in-season reports of harvest and weir counts will be shared with state and federal agencies. Annual reports will be produced after each field season, and a final report including all four seasons will be produced at the end of the project.

Partnership/Capacity Building:

From 2001-2009, HCA worked with of ADF&G to build capacity on Fisheries Resource Monitoring Program projects with a goal of taking over operations in their entirety by the 2010 field season. HCA has been effectively operating the program on their own since 2010. The success of the program has lead to other fisheries based projects and partnering with organizations such as the The Nature Conservancy and the USFS. 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 in Hetta Inlet. The USFS continues to offer technical assistance to HCA’s fisheries program.

Project Number: 18-605
Title: Klawock Lake Sockeye Salmon Population Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Jeff Reeves, Craig Ranger District, US Forest Service (USFS)
Co-Investigator(s): 1) Klawock Cooperative Association (KCA) and 2) Jeff Lundberg, Klawock River Fish Hatchery, Southern Southeast Regional Aquaculture Association (SSRAA) \$28,555

Project Cost:	2018: \$28,555	2019: \$ 28,525	2020: \$29,275	2021: \$30,055
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Total Cost: \$116,410

Issue: Sockeye Salmon (*Oncorhynchus nerka*) are the most important subsistence salmon species for rural residents in the southeast Alaska region. The Klawock Lake system on Prince of Wales Island (PWI) is subject to popular Federal and State subsistence fisheries and a sport fishery that is highly utilized by Alaska resident and non-resident anglers. This proposed project addresses a critical Southeast Alaska subsistence fishery concern that has been repeatedly identified as a monitoring need by the Southeast Alaska Subsistence Regional Advisory Council (SEASRAC) and the Southeast Alaska Fisheries Information Service Strategic Plan. Both the USFS and the ADF&G consider the management of the Klawock Lake Sockeye Salmon population to be a key subsistence issue for PWI due to the popularity and importance of this subsistence fishery.

Objectives:

1. Count the number of adult and jack Sockeye Salmon that pass into Klawock Lake from July 1 to September 30.
2. Estimate the age, length, and sex composition of the Klawock River Sockeye Salmon escapement with a coefficient of variation less than 10%.

Methods: (1) A channel-spanning aluminum and steel bipod weir will be employed to census the Sockeye Salmon population returning to Klawock Lake. The weir will be operated continuously from the 1st of July until September 30th during each study year. This time frame covers typically over 90 percent of the Klawock Lake Sockeye returns. SSRAA staff will count and release any Sockeye Salmon encountered during the month of October. (2) The age, sex, and length (ASL) composition of the early run Klawock Lake Sockeye Salmon will be assessed by sampling returning adult fish captured in the weir trap. Individuals will be sampled at systematic intervals, corresponding to frequencies that are designed to obtain a minimum total annual N of 600.

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, 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. KCA’s responsibilities will include hiring and supervision of the project’s field technician. Jeff Lundberg, hatchery manager for SSRAA will oversee proper weir and raceway operation at the site and supervise SSRAA personnel that may be involved in the project.

Partnership and Capacity Building: Both the USFS and KCA will be provided funds to compensate the lead field fisheries biologist and hire the field technicians needed for this study; local hiring priority will be given to qualified personnel from the PWI Native organizations and Island’s rural communities to fill these positions. This proposal represents the results of extensive interagency cooperation between fisheries and subsistence program personnel from the KCA, SSRAA and the USFS. Sharing of data among all of the agencies involved in this subsistence fishery will provide better information to improve management of Klawock Lake Sockeye Salmon for all users.

Project Number: 18-606
Title: Kook Lake Sockeye Salmon Stock Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Ben Van Alen, USDA Forest Service (USFS)
Co-Investigator(s): Jacob Musslewhite, USDA Forest Service (USFS), Raynelle Jack, Angoon Community Association and Scale Aging Lab, Alaska Department of Fish and Game (ADF&G)

Project Cost:	2018: \$155,651	2019: \$156,768	2020: \$157,845	2021: \$160,073
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Total Cost: \$630,337

Issue: Sockeye Salmon returns to Kook Lake are an important subsistence resource for residents of Angoon. Past FRMP-funded weir projects have found the annual escapements of Sockeye Salmon to be highly variable (1,000 to 10,000 fish) and related to the commercial purse seine effort in Icy and upper Chatham Straits. The stock status and trend data collected by this project is needed to effectively manage fisheries for a subsistence priority.

Objectives:

1. Count (census) the annual escapement of Sockeye Salmon into Kook Lake using double-redundant video weirs.

2. Determine, with 90% certainty, if at least 90% of the Sockeye Salmon spawners in Kook Lake are age-1.

Methods:

As in past years, project personnel will count, and validate counts, of salmon, trout, and char as they swim unimpeded into Kook Lake through a pair of video net weirs. Project personnel will begin using the Blue Iris surveillance software to save and review fish-triggered video clips and get hourly and daily counts of fish, by species, entering Kook Lake. If live video from the chute cameras is interrupted, the SD cards in the onsite mini-DVRs will serve as a backup. Project personnel will continue to live on-site in a floating wall tent. A wireless link to the internet will be established with the camp to allow active monitoring of weir and site surveillance cameras and use of file sharing and communication applications. The remote monitoring technology planned for use at Kook Lake has been developed and refined at the Sitkoh Lake and Neva Lake projects. The only Sockeye Salmon that need to be handled are the ones sampled for age, sex, length, and genetic data, and those fish will be caught with beach seines off the mouth of the main inlet stream in August and on the beach spawning areas in September. A sample of 60 to 120 fish will allow us to determine if parent year escapements might be producing enough fry to fill, or exceed, the lake’s rearing capacity.

Partnerships and Capacity Building: he Angoon Community Association (ACA), ADF&G, and USDA Forest Service have been cooperating on the stock assessment of Kook Lake sockeye salmon for many years. Field personnel are all hired and employed by ACA and ACA has successfully filled these positions with local hires. ACA employees participate in USFS safety training and have on-the-job training in how to sample fish and how to operate video weir, computer, networking, and solar power systems.

Project Number: 18-607
Title: Neva Lake Sockeye Salmon Stock Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Ben Van Alen, USDA Forest Service
Co-Investigator(s): Jacob Musslewhite, USDA Forest Service, Robert Starbard, Hoonah Indian Association (HIA), and Alaska Department of Fish and Game (ADF&G)

Project Cost:	2018: \$148,951	2019: \$151,034	2020: \$153,148	2021: \$155,293
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Total Cost: \$608,426

Issue: Sockeye Salmon returns to Neva Lake are an important subsistence resource for residents of Excursion Inlet, Hoonah, and other areas of northern Southeast Alaska. The subsistence take of Neva Lake Sockeye Salmon has increased in recent years, especially after the bag limit was increased to 40 fish, making it the most liberal limit of nearby systems. Since then, both escapements and subsistence harvests have declined, prompting ADF&G to reduce the bag limit to 10 Sockeye Salmon in 2016. The

stock status and trend data collected by this project is needed to effectively manage fisheries for a subsistence priority.

Objectives:

1. Count (census) the annual escapement of Sockeye Salmon into Neva Lake using double-redundant video weirs.
2. Determine, with 90% certainty, if at least 90% of the Sockeye Salmon spawners in Neva Lake are \leq age-1.

Methods: This proposal is to continue operation of double-redundant swim-through video weirs at the outlet of Neva Lake. Video from the weirs will be transmitted over a wireless link to a recording station in Excursion Inlet where project personnel will use a computer with Blue Iris surveillance software to get hourly and daily counts of Sockeye Salmon and other species entering the lake. Swim-through video weirs have been used to count Sockeye Salmon into Neva Lake since 2010 and the remote monitoring of the weir started in 2016. The only Sockeye Salmon that need to be handled are pre-spawners seined off the mouth of the main inlet stream and beach spawning areas and sampled for age (scale), sex, length, and genetic data. A sample of 60 to 120 fish will allow us to determine if parent year escapements might be producing enough fry to fill, or exceed, the lake’s rearing capacity.

Partnerships and Capacity Building: The Hoonah Indian Association, ADF&G, and USFS began cooperating on Fisheries Resource Monitoring Program, Stock Status and Trend, projects at Neva Lake in 2002. Field personnel are all hired and employed by HIA and HIA has successfully filled these position with local hires. HIA employees will participate in USFS safety training and have on-the-job training in how to sample fish and how to operate video weir, computer, networking, and solar power systems.

Project Number: 18-608
Title: Sarkar Sockeye Salmon Stock and Harvest Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Ariel Cummings & Thor Eide, USFS Fisheries Biologists
Co-Investigator(s): Maranda Hamme, Craig Tribal Association Environmental Coordinator, Shannon Yates, Craig Tribal Association Environmental Planner, Jeff Reeves, USFS Craig Ranger District Subsistence Fisheries Biologist

Project Cost:	2018: \$127,059	2019: \$76,872 77	2020: \$77,544	2021: \$78,250
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Total Cost: \$359,725

Issue: Sockeye Salmon (*Oncorhynchus nerka*) comprise the most important subsistence fishery resource for rural residents in the Southeast Alaska region. The Sarkar Lake watershed on Prince of Wales Island has supported extensive customary and traditional use and subsistence harvests by Alaska residents. This proposed project addresses a critical Southeast Alaska subsistence fishery concern that has been

repeatedly identified as a monitoring need by the Southeast Alaska Subsistence Regional Advisory Council and the Southeast Alaska Fisheries Information Service Strategic Plan. Both the United States Forest Service (USFS) and the Alaska Department of Fish and Game also consider the management of the Sarkar Sockeye Salmon population to be a key subsistence issue for Prince of Wales Island due to the early run timing and uniqueness of this Sockeye Salmon population.

Objectives:

1. Obtain an annual minimum count of Sockeye Salmon escapement into the Sarkar watershed.
2. Estimate the age, sex and length distribution of Sockeye Salmon in the Sarkar watershed escapement with a coefficient of variation less than 10% for each age class estimate.
3. Estimate subsistence harvest of Sockeye Salmon in Sarkar cove with a coefficient variation less than 15%.

Methods:

- 1) Enumerate the annual escapement of sockeye salmon into the upper Sarkar watershed using a video weir systems from May 1 through August 31. Obtain a peak count for tributaries flowing into Sarkar Lake from weekly foot surveys.
- 2) Estimate the age, sex, and length distribution of Sockeye Salmon in the Sarkar watershed, using beach seine and dip net gear to capture fish.
- 3) Estimate subsistence harvest in Sarkar cove via harvest interviews and creel surveys.

Products: Results of the study will be available as annual progress and final reports submitted to FIS-OSM and as formal presentations provided at SERAC, Federal/State agency, and professional society meetings.

Investigators Ability and Resources: Ariel Cummings and Thor Eide are USFS Fisheries Biologists. Ms. Cumming and Mr. Eide's responsibilities include direction of the project's crew leader and technicians, acquisition and management of all field research equipment, coordination with USFS 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. Anna Guthrie, CTA Tribal Administrator, will provide contract, financial, field crew hiring, and other administration services for the project. Co-Investigator USFS Subsistence Fisheries Biologist Jeff Reeves, through in-kind support, will help with project administration, project logistics, writing and editing of progress and final reports.

Partnership and Capacity Building: This proposed project has substantial capacity development aspects associated with it. The USFS staff guidance and expertise will be match while CTA will be provided funds to compensate the lead field fisheries biologist and hire the field technicians needed for this study; local hiring priority will be given to qualified personnel from the Prince of Wales Island Native organizations and Island's rural communities to fill these positions. This proposal represents the results of extensive interagency cooperation between fisheries and subsistence program personnel from the CTA

and the USFS. Sharing of data among all of the agencies involved in this subsistence fishery will provide better information to improve management of Sarkar Creek sockeye salmon for all users.

Project Number: 18-609
Title: Sitkoh Lake Sockeye Salmon Stock Assessment
Geographic Region: Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Ben Van Alen, USDA Forest Service
Co-Investigator(s): Jacob Musslewhite, USDA Forest Service, Raynelle Jack, Angoon Community Association (ACA) and Scale Aging Lab, Alaska Department of Fish and Game (ADF&G)

Project Cost:	2018: \$81,111	2019: \$82,262	2020: \$83,456	2021: \$84,669
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Total Cost: \$331,498

Issue: Sockeye Salmon returns to Sitkoh Lake are an important subsistence resource for residents of Angoon. Past Fisheries Resource Monitoring Program-funded escapement monitoring projects have found annual escapements highly variable and related to the commercial purse seine effort in Icy and upper Chatham Straits. The stock status and trend data collected by this project is needed to effectively manage fisheries for a subsistence priority.

Objectives:

1. Count (census) the daily and annual escapement of Sockeye Salmon into Sitkoh Lake using remotely monitored double-redundant video net weirs.
2. Determine, with 90% certainty, if at least 90% of the Sockeye Salmon spawners in Sitkoh Lake are \leq age-1.

Methods: Count, and validate counts, of Salmon, trout, and Char as they swim unimpeded into Sitkoh Lake through a pair of video net weirs. As is past years, the net weirs will be remotely monitored and maintained during crew exchange flights by project personnel who also work on the Kook Lake video net weir project. Live video from the underwater cameras, and from surveillance cameras at the Sitkoh weir site, will be wirelessly linked to computers at the ACA office in Angoon, the weir camp at Kook Lake, and the internet. Project personnel will use the Blue Iris surveillance software to save and review fish-triggered video clips and get hourly and daily counts of fish, by species, entering Sitkoh Lake. If live video from the chute cameras is interrupted, the SD cards in the onsite mini-DVRs will serve as a backup. The remote monitoring technology planned for use at Sitkoh has been developed and refined at the Sitkoh Lake and Neva Lake projects over the past few years and much of the equipment is already in place, such as the wireless link to Angoon. A seasonal goal of 60 to 120 adult sockeye salmon will be captured in the Sitkoh system using beach seine or dip net gear, sampled for age (scales), sex, and length (ASL) data, and released. A sample of 60 to 120 fish will allow us to determine, with 90% certainty, if at least 90% of the

fish are \leq age-1. If there are appreciable numbers of fish \geq age-2, then parent year escapements might be producing enough fry to fill, or exceed, the lake's rearing capacity.

Partnerships and Capacity Building: The ACA, ADFG, and USDA Forest Service have been cooperating on the stock assessment of Sitkoh Lake Sockeye Salmon for many years. Field personnel are all hired and employed by ACA and ACA has successfully filled these positions with local hires. ACA employees participate in USFS safety training and have on-the-job training in how to sample fish and how to operate video weir, computer, networking, and solar power systems.

Project Number: 18-610
Title: Klag Lake Sockeye Salmon Stock Assessment **Geographic Region(s):** Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Kyle Rosendale, Fisheries Biologist, Sitka Tribe of Alaska, kyle.rosendale@sitaktribe-nsn.gov

Project Cost:	2018: \$137,232	2019: \$138,416	2020: \$143,464	2021: \$148,660
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Total Cost: \$567,772

Issue: Klag Lake has become the most important source of sockeye salmon (*Oncorhynchus nerka*) for the community of Sitka. Since 2008, subsistence harvest of sockeye at Klag Lake has equaled the combined harvest at Sitka's second- and third-most important systems, Redoubt Lake and Necker Bay. However, Klag Lake typically has a much lower escapement than these other highly utilized Sitka-area sockeye systems. Klag Lake has seen declining escapement and increasing harvest trends since monitoring was implemented in 2001. Klag Lake sockeye are vulnerable to overharvest as they are considered to be extremely dependent upon high flows to escape into freshwater and the bathymetry of the bay and current harvest methods and limits allow for substantial numbers of sockeye to be efficiently harvested without any appreciable escapement. The Klag Lake Sockeye Salmon Stock Assessment Project will provide managers with daily escapement and harvest data to allow for in-season management decisions critical to sustainable management of the Klag Lake sockeye stock.

Objectives:

1. Enumerate the escapement of sockeye salmon at Klag Bay.
2. Describe the run timing, or proportional daily passage, of sockeye salmon through the weir.
3. Estimate the sex and age composition of sockeye salmon such that the coefficient of variation is 7.5% or less.
4. Estimate harvest by subsistence and sport fishermen at Klag Bay so that the coefficient of variation is 15% or less.

Methods: A rigid weir will be installed in the outlet stream of Klag Lake and escapement data will be recorded for all salmonids passing through the weir. A minimum of 462 sockeye salmon will be sampled for age, length, and sex data. Sampling goals will be proportioned to reflect historic run timing. Mark-

recapture methods will be used to validate the weir estimate for sockeye. A running total of approximately 20% of all sockeye at the weir will receive an adipose fin clip. Dead or spawned out fish will be sampled for marks on the spawning grounds; all sampled fish will receive a pelvic fin clip to ensure sampling without replacement. Creel surveys will be conducted with all fishing parties observed in Klag Lake. Escapement and harvest data will be reported to managers on a daily basis via the US Forest Service Dispatch network.

Partnerships/Capacity Building: The Sitka Tribe of Alaska is the principal investigator for the project and has worked closely and successfully with the Alaska Department of Fish & Game and the US Forest Service. Most previously funded Fisheries Resource Monitoring Program projects were not led by Alaska Native organizations, so tribal leadership of the Klag Lake Sockeye Salmon Stock Assessment Project is noteworthy. The project is supported by federal, state, and local governments and agencies, as well as local conservation groups.

Project Number: 18-611
Title: Northern Southeast Alaska Eulachon Population Dynamics Monitoring
Geographic Region(s): Southeast Alaska Region
Data Type: Stock Status and Trends
Co-Investigator(s): Meredith Pochardt, Takshanuk Watershed Council. HC 60, Box 2008. Haines, AK. 907-766-3542 meredith@takshanuk.org,

Harriet Brouillette, Chilkoot Indian Association. PO Box 490, Haines, AK 99827. 907-766-2323. hbrouillette@chilkoot-nsn.gov

Jami Belt, National Park Service, Klondike Gold Rush National Historical Park. P. O. Box 517, Skagway, AK 99840. (907)983-9228. jami_belt@nps.gov

Nicole Kovacs, Skagway Traditional Council. P.O. Box 1157 Skagway, AK 99840. (907) 983-4068 nicole@skagwaytraditional.org

Taal Levi, Oregon State University 1500 SW Jefferson St. Corvallis, OR 97331. 831-332-7873 taal.levi@oregonstate.edu

Project Cost:	2018: \$128,845	2019: \$210,372	2020: \$214,124	2021: \$214,976
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Total Cost: \$768,317

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*). In Northern Southeast Alaska the Tlingit traditionally fish for eulachon in the Chilkoot and Chilkat Rivers near Haines, the Skagway and Taiya Rivers near Skagway, the Lace and Antler Rivers entering Berners Bay and the Mendenhall River. 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). Through a partnership with the Chilkoot Indian Association (CIA), Oregon State University (OSU), Klondike Gold Rush National Historical Park (KLGO), the Skagway Traditional Council (STC), and the Takshanuk Watershed Council (TWC) propose to build the capacity of tribal governments to develop a regional tribally-based eulachon population monitoring network to analyze annual spawning biomass and traditional ecological knowledge of eulachon populations. The current lack of knowledge about eulachon combined with the variable spawning biomass and low fidelity to natal rivers has complicated management decisions and necessitates the regional population monitoring proposed through this initiative.

Project Number: 18-612
Title: Kanalku Lake Subsistence Sockeye Stock Assessment **Geographic Region(s):** Southeast Alaska Region
Data Type: Stock Status and Trends
Principal Investigator: Raymond Vinzant, Alaska Department of Fish and Game (ADF&G), Division of Commercial Fisheries, Region 1.
Co-Investigator(s): Frank Sharp, Angoon Community Association (ACA); Ben Van Alen USDA Forest Service (USFS), Juneau Ranger District.

Project Cost:	2018: \$179,951	2019: \$183,736	2020: \$ 187,939	2021: \$194,905
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Total Cost: \$746,400

Issue: Kanalku Lake (Admiralty Is.) supports a small run of sockeye salmon that in some years has provided more than 90% of the total sockeye subsistence harvest reported by the federally qualified subsistence users in the nearby community of Angoon. ADF&G, ACA, and USFS have cooperated on stock assessment programs at Kanalku Lake since 2001 to address concerns regarding overharvest, declining run size, and lack of spawning escapement information. Escapements have averaged only 1,320 fish since 2001, and escapements of <300 fish in 2001 and 2003 led to voluntary subsistence fishery closures during 2002–2005 in order to rebuild runs. This FRMP project will provide four additional years of precise estimates of spawning escapement—information critical to effective fishery management and long-term assessment of the status of this important subsistence resource.

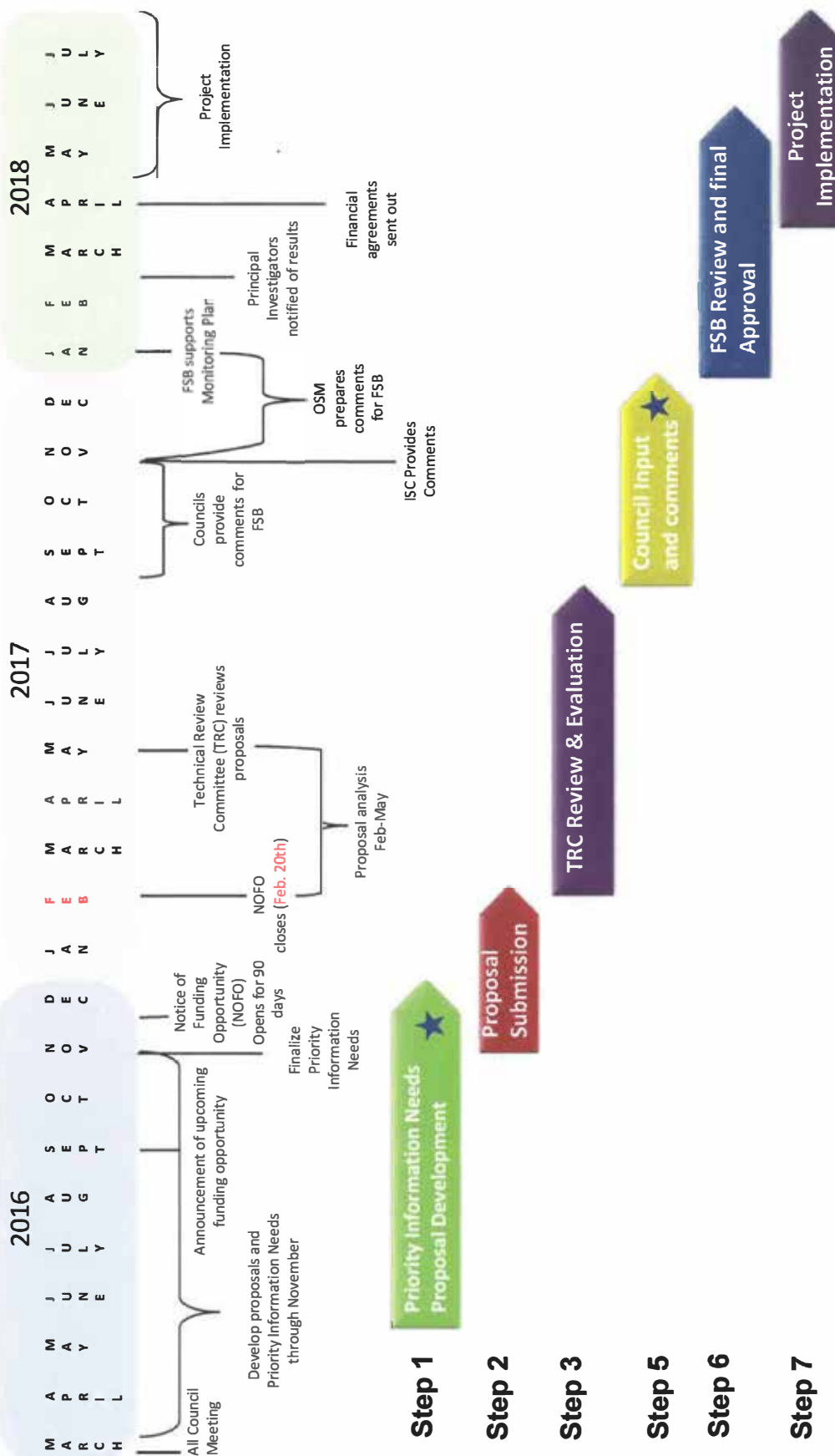
Objectives:

1. Count all sockeye salmon passed through a camera weir into Kanalku Lake for the duration of the run to estimate spawning escapement.
2. Estimate the age, length, and sex composition of the Kanalku Lake sockeye salmon spawning escapement such that the estimated proportion of each age class is within 5% of the true value with at least 90% probability.

Methods: Sockeye salmon will be counted through a “double-redundant” picket and camera weir operated mid-June to late August at the outflow of Kanalku Lake. The primary weir will consist of a standard aluminum bipod-picket weir anchored to the streambed, and a shorter secondary fence will be constructed < 1 m upstream of and braced against the primary weir. A camera chute, housing two underwater cameras, will span both fences. Fish will be recorded with motion-detection DVRs as they swim unimpeded through the weir structure. This design, which is similar to weirs used at other FRMP projects and successfully used at Kanalku in 2016, will provide a complete census of the spawning population as the fish swim unimpeded into the lake. In addition, 265 fish will be sampled on the spawning grounds to estimate the age, sex, and length composition of the spawning population.

Partnerships/Capacity Building: ADF&G, ACA, and USFS will continue to work cooperatively on project administration and design. ACA manages administration, field support, and hiring of fishery technicians from the community of Angoon. Employees will receive pre-season and on-the-job training to develop skills and knowledge required to successfully meet project objectives. New and returning crew members can expect to learn and refresh skills and knowledge in salmon scale, age, and length sampling techniques, installation and operation of salmon weirs and digital video technology (and other stock assessment methods), and enhance computer skills. ADF&G, USFS, and ACA will also continue to cooperate in providing field crews with safety training, including wilderness first aid and CPR, wilderness survival, safety around bears, water and boating safety, safe travel in aircraft, and remote radio and phone communications. All pre-season and on-the-job training serves to promote safety in the field, enhance the job skills of seasonal workers, and contribute to interest in and capacity for fisheries research in rural subsistence communities.

2018 FRMP Timeline



ANNUAL REPORTS

Background

ANILCA established the Annual Reports as the way to bring regional subsistence uses and needs to the Secretaries' attention. The Secretaries delegated this responsibility to the Board. Section 805(c) deference includes matters brought forward in the Annual Report.

The Annual Report provides the Councils an opportunity to address the directors of each of the four Department of Interior agencies and the Department of Agriculture Forest Service in their capacity as members of the Federal Subsistence Board. The Board is required to discuss and reply to each issue in every Annual Report and to take action when within the Board's authority. In many cases, if the issue is outside of the Board's authority, the Board will provide information to the Council on how to contact personnel at the correct agency. As agency directors, the Board members have authority to implement most of the actions which would effect the changes recommended by the Councils, even those not covered in Section 805(c). The Councils are strongly encouraged to take advantage of this opportunity.

Report Content

Both Title VIII Section 805 and 50 CFR §100.11 (Subpart B of the regulations) describe what may be contained in an Annual Report from the councils to the Board. This description includes issues that are not generally addressed by the normal regulatory process:

- an identification of current and anticipated subsistence uses of fish and wildlife populations within the region;
- an evaluation of current and anticipated subsistence needs for fish and wildlife populations from the public lands within the region;
- a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs related to the public lands; and
- recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

Please avoid filler or fluff language that does not specifically raise an issue of concern or information to the Board.

Report Clarity

In order for the Board to adequately respond to each Council's annual report, it is important for the annual report itself to state issues clearly.

- If addressing an existing Board policy, Councils should please state whether there is something unclear about the policy, if there is uncertainty about the reason for the policy, or if the Council needs information on how the policy is applied.
- Council members should discuss in detail at Council meetings the issues for the annual report and assist the Council Coordinator in understanding and stating the issues clearly.

- Council Coordinators and OSM staff should assist the Council members during the meeting in ensuring that the issue is stated clearly.

Thus, if the Councils can be clear about their issues of concern and ensure that the Council Coordinator is relaying them sufficiently, then the Board and OSM staff will endeavor to provide as concise and responsive of a reply as is possible.

Report Format

While no particular format is necessary for the Annual Reports, the report must clearly state the following for each item the Council wants the Board to address:

1. Numbering of the issues,
2. A description of each issue,
3. Whether the Council seeks Board action on the matter and, if so, what action the Council recommends, and
4. As much evidence or explanation as necessary to support the Council's request or statements relating to the item of interest.



Federal Subsistence Board

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



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

FOREST SERVICE

OSM 17045.DP

AUG 15 2017

Mr. Michael Bangs, Chair
Southeast Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1011 E. Tudor Rd. MS 121
Anchorage, Alaska 99503-6199

Dear Chairman Bangs:

This letter responds to the Southeast Alaska Subsistence Regional Advisory Council's (Council) fiscal year 2016 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. Poor Returns of Sockeye Salmon

The Council is concerned about poor returns of Sockeye Salmon throughout Southeast Alaska and feels there is a need to explore the causes of poor returns and find strategic ways to address those causes. The Council would appreciate information on the effects climate change is having on salmon returns.

Response:

The Board recognizes the importance of Sockeye Salmon to Federally qualified subsistence users in Southeast Alaska. We are aware that poor returns of Sockeye Salmon have been recently documented at several Fisheries Resource Monitoring Program (FRMP) projects and also at other locations by subsistence users. Conversely, 11 out of 13 Sockeye Salmon indicator stocks in Southeast Alaska monitored by the Alaska Department of Fish and Game met their escapement goal in 2016.

Chairman Bangs

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Sockeye Salmon returns fluctuate naturally and are subject to many environmental variables that are outside the purview of the Federal Subsistence Management Program. Variability in lake rearing conditions, extreme high and low flow events, high water temperatures, ocean conditions, and commercial fisheries interception all affect the number of Sockeye Salmon that return to watersheds that are important to subsistence. Environmental conditions, including those influenced by climate change, cannot be addressed through the Federal Subsistence Management Program. The only ways to address commercial fisheries interception of Sockeye Salmon destined for waterbodies important to subsistence are to submit proposals to the Alaska Board of Fisheries (BOF) and through filing petitions for extraterritorial jurisdiction with the Secretaries of the Interior and Agriculture.

The BOF and the Board continue to be important venues to address fisheries management issues in the form of proposals to change regulations. Since the State subsistence Sockeye Salmon limits in State-managed waters are put into regulation by the Alaska Board of Fisheries, they can no longer be adjusted in-season by State Area Management Biologists. Submitting proposals to the Alaska Board of Fisheries is the only way to change these limits for State-managed waters.

The FRMP is an available tool in the Federal Subsistence Management Program to monitor and manage Sockeye Salmon stocks of highest interest to subsistence users. Projects funded through the program have provided valuable information used for managing and conserving these stocks. The Board appreciates the Council's continued participation in choosing priority fisheries for study under the FRMP.

2. Unguided Fishermen: Subsistence Users versus Other Users

Council members have noted an increase in "unguided fishermen" throughout Southeast Alaska. The Council has identified the need to address training of unguided fishermen on the environment and safety. There is also a need to address the amount of fish that they take, which is not recorded. There are also takes from lodges (from non-resident fishermen) that are unaccountable with effects on subsistence users. This Council has submitted previous proposals to address this with Board of Fisheries which haven't been accepted (specifically Sockeye Salmon). The Council requests suggestions from the Board about how to address these concerns.

The Council would like to know if it is appropriate for the Board or the Office of Subsistence Management to request data from all user groups to make proper and informed decisions, specifically regarding unguided fishermen:

- *Obtain lodge information from the State. How many lodges have unguided clients or guided clients vs unguided? Minimally, make inquiries of what information is available.*
- *Request data from the U.S. Forest Service (USFS) on the groups that stay in the bay at Kake. Only USFS would know if they have a permit and there are concerns with amount of fish being taken.*

Chairman Bangs

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Response:

The Board appreciates the concern with the perceived increase in the presence of “unguided fishermen.” We understand that term to refer to the practice of lodges or other businesses equipping non-resident anglers with boats, gear, and local knowledge, so that they can fish without the assistance of a licensed guide. While this practice appears to be becoming more widespread, there are no requirements for lodges to report the number of unguided fishermen, so it is difficult to assess the trend.

The special uses staff in the Petersburg Ranger District is unaware of any permits that have been issued for groups camping on Forest Service lands in the Kake area. A floating lodge in the Bay of Pillars area receives an annual permit for clients to go ashore in the Kutlaku area, but they have reported no use in the past few years.

In general, data on harvest and effort by guided anglers is available once the guide log books are submitted and information is entered, but similar data available for unguided anglers generally contains less precise detail due to the nature of the Statewide Harvest Survey. Information on the harvest of salmon by guided anglers is available from logbook data collected by the Alaska Department of Fish and Game (ADF&G). Charter operators and fishing guides are required to keep and submit daily logbooks of all fish that are caught by their clients, and data from these logbooks are compiled by ADF&G. Based on logbook data, the harvest of Sockeye Salmon by guided anglers is relatively small compared to other user groups. In 2014, the most recent year for which logbook data are available, 865 Sockeye Salmon were reported harvested in all of Southeast Alaska. This number is probably quite accurate, as the reporting requirements for guides are stringent and consequences for non-compliance are severe.

In contrast, the only estimate of harvest by unguided sport anglers (both resident and non-resident) comes from the annual Statewide Harvest Survey. This is a voluntary survey mailed to a subset of fishing license holders, asking them to report their effort and catch. While it is suitable for estimating sport harvest in broad areas, it is not usable to monitor harvest at a specific location, especially if participation in the fisheries at that location takes place at low levels. It also does not distinguish between resident and non-resident anglers. According to the Statewide Harvest Survey, about 20,000 Sockeye Salmon are harvested by sport anglers in Southeast Alaska each year. That number has remained relatively stable since 1997, so there does not appear to be any general trends of increasing sport harvest of Sockeye Salmon. However, it would be impossible to determine if there was a pattern of harvest at a specific location that might lead to a conservation concern.

Given the disparity in reporting requirements between guided and “unguided” non-resident anglers, one possible solution would be to require logbook-style record keeping and reporting requirements for certain unguided non-resident anglers, such as those fishing from a boat provided by a lodge. Legislation proposed in 2011 (Senate Bill 24) would have required logbook data to be collected from certain unguided angler trips, but the legislation failed to pass.

3. Extraterritorial Jurisdiction Process

The Council remains interested in how the petition for extraterritorial jurisdiction for the marine waters in Chatham Strait is being resolved as the Alaska Board of Fisheries further defined the Amounts Necessary for Subsistence. The Council would like the Board to advise what avenues are available to work with the State on ensuring actions are taken within Council recommendations.

Response:

Two proposals were submitted to the BOF requesting the revision of the amounts reasonably necessary for subsistence for salmon in Southeast Alaska Commercial Fisheries Districts 12 and 14. The BOF considered Record Copy number 3 from ADF&G. These options were published by ADF&G in Special Publication BOF 2014-06, Customary and Traditional Uses of Salmon and Options for Revising Amounts Reasonably Necessary for Subsistence Uses of Salmon in Districts 12 and 14, Southeast Alaska, which provided a total of 7 options for the BOF to consider during its deliberations. The BOF selected Option B, which based the revised Amounts Necessary for Subsistence (ANS) on the 5-year (2008–2012) average harvest of all salmon species combined, as estimated from permit returns, plus or minus the standard deviation for those years. Under this new regulation, the ANS for District 14 will be 600 – 1,500 salmon and District 12 it will be 1,100 – 1,700 salmon. The new ANS for salmon was established specifically for Districts 12 and 14 and do not include the ANS for salmon for the other districts.

At the same meeting, the BOF established the new ANS for Districts 12 and 14, the Chatham Strait and other commercial salmon fisheries management plans were modified to reduce harvest on migrating Sockeye Salmon for multiple reasons – including addressing the referenced extraterritorial jurisdiction petition. The BOF reduced commercial fishing opportunity by establishing new seasonally closed areas with the intent of allowing greater than 80 percent of the Kanalku Sockeye Salmon stock to pass through the area prior to commercial fishing by the purse seine fleet. New information collected through the genetic sampling of the commercial fisheries in the area was used as part of the justification for establishing the closure dates.

This response to the Council’s concern was written by interpreting the phrase “within standards” as meeting escapement goals and ANS for stream and subsistence fishermen within Districts 12 and 14. If either of these fall short of established goals, the Council should act following the recommendations below.

If the Council determines the recently-modified fisheries management plans for the commercial fisheries in the Chatham Strait did not sufficiently provide the sought timely protection of salmon migrating through the area, it should communicate such a determination, and the basis for it, to the ADF&G local and regional management staff. Similarly, the Council should also inform ADF&G if subsistence fisheries are not providing reasonable opportunity to harvest salmon due to interception by commercial fisheries. The Council should also then invite ADF&G staff to attend a Council meeting and hear testimony and discussion on the issue.

If the Council determines State fisheries management actions are not providing reasonable opportunity in the State managed subsistence fisheries and the management actions are a result of the existing fisheries management plans or management practices, the Council should submit an emergency petition to the State of Alaska for temporary regulatory relief or submit a proposal to the BOF when Southeast Alaska finfish are in cycle. The deadline for submitting proposals for the Southeast finfish cycle meeting was April 11, 2017. The next open window to submit proposals to the BOF will be in about three years. If the Council determines a proposal should be taken out of cycle, the Council could submit an Agenda Change Request, seeking the BOF to assign the proposal to a 2017/2018 meeting. The Federal subsistence management program will assist the Council with whatever direction it chooses.

4. Outstanding National Resource Water Designation

The Council received a request for the Yakutat Forelands to be deemed an Outstanding National Resource Water Designation (ONRWD) as a Tier 3 area. This designation is provided by the Environmental Protection Act, but it is up to the State Legislature to implement statutes that allow the State to adopt regulations to implement a Tier 3 designation. There are currently no State avenues to process nominations for this designation. The Council would like to request the Board to send a letter to the Secretaries of the Interior and Agriculture requesting that they communicate a request to the Governor of Alaska to seek legislation that would allow the Alaska Department of Environmental Conservation to pass regulations and move forward on a designation allowed in federal law.

Response:

Upon further consultation with Council member Ray Sensmeier and reviewing the current status on this process, the Board will consider your request and, if deemed appropriate, send a letter to the Secretaries of the Interior and Agriculture forwarding the Council's concern. If a letter is sent, the Board will copy the Council.

5. Overpopulation of Bears

The Council feels it is imperative that the Board be aware of the increasing population of bears in Southeast Alaska. Bears have shown an increase in aggressive behavior recently which have resulted in more human-bear contact and, in some instances, maulings. It is the intention of the Council to obtain further information on this matter and to identify the causes of increased bear population so that the issue can be appropriately addressed.

Response:

Thank you for alerting us to your concerns regarding bear populations and behavior. The Board consulted with ADF&G for more information on recent bear attacks and population trends. Regarding the five brown bear attacks in Southeast Alaska during 2016, there were no fatalities and all were deemed by ADF&G to be defensive attacks. Low salmon runs, particularly Pink

Salmon, were reported for most of Southeast, causing bears to be stressed, which may have led to increased negative interactions between bears and people.

Regarding bear populations, a study of brown bears was recently completed for the Yakutat forelands in Unit 5A, and can be found online.¹ This is the most current and accurate estimate of brown bears for a specific region within Southeast. The most recent brown bear management reports are for the reporting period from July 2012 to June 2014, and can be found online.² The first four chapters provide information on Southeast. Both brown and black bear harvest has declined following peak harvest rates in 2007 (relative to records dating back to the 1970s). The decline in harvest may be partially attributable to lower hunter effort during the recession starting in 2008; however, increasing female harvest in some subunits could be an indication of lower population levels, and could certainly precipitate further declines if populations are at a lower density. As well, conservation concerns for these species generated a number of recent management actions by ADF&G and the Alaska Board of Game (BOG) to deliberately decrease harvest (i.e. black bear non-resident unguided draw, and Emergency Orders in GMU 4). The following is a summary of the known information on brown bears for each unit:

Unit 1 (mainland): Most of the information used to assess and manage mainland brown bear populations comes from mandatory sealing data, registration permit hunt reports, observations by staff, density estimates, and anecdotal information from the public. These sources indicate that the brown bear population is relatively stable across Unit 1. Brown bear observations have, however, increased from the Taku River south to Endicott Arm in Unit 1C.

Unit 3 (Islands of the Petersburg, Kake, and Wrangell areas): Quantitative populations estimates are not available for bears in Unit 3. Management is informed by hunter registration data and anecdotal observations, staff observations, and defense of life and property (DLP) kills. The population is believed to be stable at low levels.

Unit 4 (Admiralty, Baranof, Chichagof, and adjacent islands). Extensive brown bear research has been conducted on Admiralty and Chichagof islands from the early 1980s through 2004. Unit 4 brown bear populations are believed to be stable.

Unit 5 (Cape Fairweather to Icy Bay, Eastern Gulf Coast): ADF&G estimated the 2013 brown bear population in Unit 5A to be 354 ± 29.2 bears, lower than the previous estimate of 522 ± 130.5 bears in 1993. Given uncertainty in the methods used to produce the 1993 estimate (no specific research was conducted for this estimate), it is unknown whether the lower estimate in 2013 equates to a reduction

¹http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research_pdfs/brown_bear_population_estimation_in_yakutat_southeast_alaska.pdf

²<http://www.adfg.alaska.gov/index.cfm?adfg=wildliferesearch.smr20151>

in population size. Data gathered from sealing certificates, incidental observations, and hunter interviews indicate no notable changes in the Unit 5 brown bear populations in recent years.

In summary, as of 2014, no notable increases in brown bear populations have been reported by ADF&G. Alternatively, there may be conservation concerns in some areas. We appreciate continued information from the Council and ADF&G on bear behavior, bear-human interactions, and observations of changes in abundance in the future.

6. Central SE Game Unit 3 issues with Deer Population & Harvest Limits

The Council recognizes that there is a problem with the Sitka black-tail deer population and bag limits in Game Unit 3 and would seek the Board's support in identifying where subsistence needs are not being met in Unit 3 and a strategy to meet that need.

Response:

The Board recognizes that deer populations in Unit 3 have historically fluctuated in response to severe winters and predation. Severe winters in the late 1960s and early 1970s, and more recently from 2006-2009, resulted in significant declines in the Unit 3 deer population. As a result, both Federal and State deer seasons and harvest limits in Unit 3 are generally more restrictive than those found in other game management units in the Southeast Region. With access to most Unit 3 hunting areas being by water, the Board understands the difficulties for subsistence users to adequately meet their subsistence needs.

Following multiple years of deer hunting closure in the unit, limited harvest opportunity has existed since the early 1990's. In the fall of 2000, in order to comply with the State's Intensive Management (IM) Law, the Alaska Board of Game set Unit 3 deer IM population objectives at 15,000 and harvest objectives at 900. Since 2005, the annual harvest objective for Unit 3 deer has not been achieved, resulting in portions of the Unit having been identified as a BOG authorized predator control area. To better assess how the reduced levels of harvest may be affecting subsistence users, household use surveys should be implemented within the Unit.

The Board recognizes that winter severity, predation by wolves and bears, potential competition with an increasing moose population, and reductions in deer habitat capability resulting from development activities, all play important roles in the ability of deer to recover from population declines. The Board strongly encourages both ADF&G and the U.S. Forest Service (USFS) to work cooperatively in an attempt to effectively address these issues, and achieve management objectives ADF&G has set for Unit 3 deer.

With the majority of Unit 3 land under federal ownership, the USFS Petersburg and Wrangell District Rangers have been delegated authority for deer on Federal lands within the unit. The delegations allow for the issuance of emergency special actions not to exceed 60 days or temporary special actions to set Federal subsistence harvest quotas, close or reopen Federal

seasons, and adjust harvest and possession limits for deer. U.S. Forest Service District Rangers who also have delegated authority can close Federal Public lands to the take of deer by all users. If the Council believes additional regulatory changes are needed beyond the delegated authority process, then the Council may either submit a Special Action Request to the Board and/or formal regulatory proposals to both the Board and to the Alaska Board of Game through their regulatory cycles.

7. Wolf Management Plan Development for Unit 2

The Council encourages development of a Unit 2 wolf management plan to address Federal management of wolves in the Prince of Wales area of Southeast Alaska. We envision a cooperative effort with Alaska Department of Fish and Game (ADF&G), US Fish and Wildlife Service (USFWS), USFS, and Federal subsistence scientists and managers and ask that the Board task the Office of Subsistence Management with bringing the right agencies together to work on a Unit 2 wolf management plan. Further, the Council requests that one or two Council members participate in the development of this plan.

Response:

The Board recognizes the controversy associated with wolf management in Unit 2 and appreciates the efforts of the Council to craft a solution that works for all users. Since the Council's March 2017 meeting, the Tongass National Forest has released a report entitled "Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2." The report was mailed to all Council members following its publication, and is available online.³ An interagency team consisting of members from ADF&G, USFS (including Forest Service Subsistence Management) and the USFWS, with review by Forest Service Subsistence staff, produced the report with the objective of addressing the Tongass Forest Plan standard to develop and implement a Wolf Habitat Management Program for Unit 2, where wolf mortality concerns have been identified. As per standards and guidelines in the Forest Plan and key components of wolf management in Unit 2, the Program provides recommendations for deer habitat management, road management, wolf management and mortality, den management, and human dimensions. The human dimensions component includes:

- Inform the Southeast Alaska Subsistence Regional Advisory Council, local advisory committees, the Federal Subsistence Board and the Alaska Board of Game on an annual or more frequent basis of current wolf research and management efforts.
- Hold public meetings or solicit public input and information sharing when setting wolf harvest management quotas.

The Interagency Wolf Habitat Management Program is not a decision document. It provides recommendations for wolf management to be considered as on the ground projects are planned and implemented in Unit 2. Throughout these processes the Forest Service is committed to

³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd537975.pdf

coordinating with and involving all users, including the Council, regarding all aspects of wolf management in Unit 2. The Forest Service believes another wolf management planning effort at this time would be redundant. The Board is also aware of the proposals that the Council submitted to adjust wolf management in Unit 2 and looks forward to working with the Council to find solutions that work for subsistence users as well as all users.

8. Eulachon Harvest on the Unuk River

The Council is concerned about the closures affecting eulachon harvest on the Unuk River. This issue has been presented to the Council and Board many times in the last 15-20 years. There is concern about the current monitoring process and how the closures of this harvest in the past several years have affected this subsistence opportunity. The Council would like to know if the Board could take special action to offer a test fishery, which could provide traditional ecological knowledge, as an effective tool to track the eulachon and get a better idea on escapement. The Council does not want to propose a harvest that might jeopardize the stock and is looking for avenues that will provide more information on eulachon returns. This information is crucial when weighing the protection of a resource against protecting a way of life. The Council requests that the Board advise what options may be best to monitor / study the Unuk River eulachon.

Response:

The Board understands the significance of Eulachon both culturally and biologically. Your suggestion of a “test fishery” to be used as a method for monitoring Eulachon, while providing some harvest, is appreciated. The institution of a “test fishery,” however, is beyond the authority of the Board. If this action were within the Board’s authority, it would not in the best interest of Eulachon management at this time.

While Eulachon abundance can exhibit considerable year-to-year variability, there has been a historic, northward trend of Eulachon populations being in decline from California to Southeast Alaska over the past 20 years. Since 2006, Federal and State managers have closed their respective fisheries on the Unuk River for conservation reasons. Outside of Alaska, State, Federal and Provincial agencies manage Eulachon extra-conservatively, with recent management activity driven by recent documented declines in ocean productivity. With the Unuk River being geographically located near these other systems it is not surprising that Eulachon returns in southern Southeast Alaska are showing similar trends to British Columbia and Washington returns.

The USFS has monitored the Unuk River since the early 2000s. Eulachon are not as easy to enumerate as salmon returns, so visual surveys are utilized to monitor returns. While the clear, shallow water of the Unuk can allow for excellent visual observation, it can also make Eulachon easily vulnerable to fishing activity. Although Eulachon have been noted returning to the Unuk since 2011, managers do not believe returns are sufficient enough for resuming subsistence fishing opportunity at past levels because the return strength continues to vary in observed numbers (from “very weak” in 2014 to “good” in 2012 and 2016). Should Eulachon populations

Chairman Bangs

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in the Unuk recover enough to resume fishing opportunity, the Federal in-season manager is delegated to set harvest limits and gear restrictions to conservatively allow for subsistence fishing opportunity.

The Fisheries Resource Monitoring Program previously funded a four year study during the period of 2014-2017 for Eulachon monitoring within both the Unuk River and fishing District 1. A proposal to continue monitoring during 2018-2021 has been submitted for consideration and is currently under review by the Technical Review Committee (TRC). This monitoring proposal will be brought forth to the Council for comment for funding at the upcoming fall meeting in October 2017.

Year	Eulachon Abundance
2001	Good?
2002	Moderate?
2003	Abundant?
2004	Weak
2005	Very weak
2006	Very weak
2007	Very weak
2008	Very weak
2009	Very weak
2010	Very weak
2011	Moderate?
2012	Good?
2013	Weak
2014	Very weak
2015	Moderate?
2016	Good?

9. Continuing Dialogue

Lastly, the following issues are carried over from 2015, and the Council would like to build dialogue on these previously identified needs and issues:

- Fisheries Resource Monitoring Program, with stress on a strategy of continued funding.
- Transboundary mining strategy.
- Baseline water monitoring. Taku/Stikine have strategies, but we need to address the issue of no access to Unuk River. The U.S. Department of Agriculture needs to facilitate monitoring.
- Use of cabins on National Park Service lands for subsistence use.
- Customary & Traditional Use. Presentations have been made and discussions heard, and the Council would like to continue discussions with Office of Subsistence Management staff in potential consideration of a proposal.

Chairman Bangs

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- Terminal Area Escapement.
- Salmon and halibut interception. Sea Otter – continued issue of sea otters moving into interior waters of SE Alaska

Response:

The Board appreciates keeping these matters at the forefront of discussion, and looks forward to continuing to work with the Council on these and other matters.

In closing, I want to thank you and your Council for their 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 our confidence that the subsistence users of the Southeast Region are well represented through your work.

Sincerely,



Anthony Christianson
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management
Carl Johnson, Council Coordination Supervisor, Office of Subsistence Management
DeAnna Perry, Subsistence Council Coordinator, U.S. Forest Service
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



Federal Subsistence Board

1011 East Tudor Road, MS 121
Anchorage, Alaska 99503



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FOREST SERVICE

PORTIONS OF BARANOF ISLAND IN UNIT 4 CLOSED TO THE HARVEST OF MOUNTAIN GOATS

SPECIAL ACTION: FEDERAL SUBSISTENCE BOARD

Under authority of: 36 CFR 242.10 and .19
50 CFR 100.10 and .19

Special Action No: 13-MG-02-17

Issued at: Sitka Alaska, July 21, 2017

Effective Date: 11:59 p.m. Monday, July 31, 2017

Expiration Date: 11:59 p.m. Sunday, December 31, 2017 unless superseded by subsequent special action

EXPLANATION:

This Special Action closes the following zones on Baranof Island near Sitka, Alaska to the harvest of mountain goats; (1) The Pyramids, (2) Slaughter Ridge, (3) Indian River, (4) Bear Mountain, (5) Rosenberg Lake, (6) Lake Irina, (7) Indigo Lake, (8) Necker Bay, (9) Lucky Chance, (10) North Kelp Bay, (11) Kasnyku/Takatz, (12) Whale Bay and (13) South Baranof.

REGULATION: 36 CFR 242.26(n)(4) and 50 CFR 100.26(n)(4) are amended to read:

Unit 4 – Mountain Goat

1 goat by State registration permit only.

Aug. 1 - Dec. 31

The Pyramids – Drainages north of Redoubt Lake, west of Redoubt Lake Trail and south of Silver Bay, including Deep Inlet and Eureka Mtn.

Closed

Slaughter Ridge – Drainages north of Katlian Bay, west of Coxe River, east of Nakwasina Sound and south of Nakwasina River downstream of Cold Storage Lake pass, but excluding the Lisianski Peninsula.

Indian River - Drainages of Sitka Sound between Katlian River and Sawmill Creek, north of Sawmill Creek, south of south fork Katlian River and west of Clarence Creek, including Indian River, Granite Creek, Starrigavan Creek, and the Mt. Verstovia/Arrowhead ridge.

Bear Mountain – Silver Bay drainages between Sawmill and Medvejie Creeks, south of Blue Lake/Creek, west of the south fork Blue Lake Creek and northwest of Medvejie Creek to Baranof Pass.

Rosenberg Lake – North fork Nakwasina River drainages upstream of the Peak 3098 Creek confluence, south of the north fork Nakwasina River downstream of the Peak 3098 Creek confluence, and Rosenberg Lake/Creek drainages.

Lake Irina – Drainages south of Redoubt Lake, north of West Crawfish Inlet and west of their respective inlet streams, but excluding the Kliuchef Peninsula.

Indigo Lake - Drainages north of Vodopad River and Green Lake downstream of the creek originating from Peak 4130, east of Silver Bay and southeast of Medvejie Creek/Lake to Baranof Pass, including Indigo Lake and Cupola (Cross) Peak.

Necker Bay – The peninsulas west of Small Arm Whale Bay/Creek, west of Benzeman Lake and southeast of Crawfish Inlet, but excluding Aspid Cape.

Lucky Chance - Drainages east of the Redoubt Lake Trail, north of Redoubt Lake Creek; and south of Green Lake and the Vodopad River, including Lucky Chance Mountain.

North Kelp Bay - Drainages east of Lake Eva Creek and north of Middle Arm Kelp Bay/Creek downstream of Lake Eva Creek pass.

Kasnyku/Takatz - Chatham Strait drainages between Kelp Bay and Triple Lake Creek, including Kasnyku and Takatz Bays.

Whale Bay – Drainages east of Small Arm Whale Bay/Creek, east of Benzeman Lake, west of Great Arm Whale Bay/Creek to the pass at Peak 2907 and drainages of Politofski Lake.

South Baranof - Drainages south of Gut Bay and the east branch of Great Arm Whale Bay and their respective inlet streams; and north of

the divide between Larch Bay and Port Conclusion.

Federal Subsistence Board by delegation to /s/Perry Edwards
Perry Edwards
District Ranger
Sitka Ranger District
July 21, 2017

JUSTIFICATION:

Data from collared goats near Sitka documented that goats have high fidelity to small home ranges and are slow to recolonize vacant habitat. That finding combined with high localized harvest in more accessible areas lead managers to develop an updated management strategy for mountain goats on Baranof Island beginning with this 2017 season. Baranof Island was divided into 34 small hunt zones. Dividing Baranof Island into more zones allows biologists to manage at the subpopulation level, which should afford hunters more opportunities and reduce the possibility of localized overharvest. Under the previous management strategy, quotas were based on larger geographical areas, which sometimes included several subpopulations. The quota for a large zone could be reached after several goats were taken from a small area around a single access point. That resulted in the large area being closed while additional harvest opportunity remained in more remote portions of that larger zone. This new strategy of subdividing large zones should provide more opportunity for hunters by allowing more remote zones to stay open after zones with easier access close.

Based on aerial surveys during 2015 and 2016, biologists documented mountain goat population levels in each of the hunt zones and assigned corresponding quotas. Zones closed by this Special Action did not have high enough population levels to allow harvest without jeopardizing the long term health of those subpopulations.

A public hearing to discuss the 2017 Baranof Island Mountain Goat Management Plan was held on July 20th, 2017 in Sitka, Alaska. The ability to teleconference was provided so residents of other affected communities could participate. Members of the public who attended were supportive of conserving mountain goats on Baranof Island through closures guided by the management plan. The 2017 management plan is similar to the 2016 plan with distinct male and female guideline harvest levels by zones on Baranof Island. Female harvest is more restrictive than male harvest when applied to the guideline harvest levels. As the guideline harvest levels in each of the zones are reached, those zones will be closed to mountain goat harvest.

The remainder of Baranof Island will remain open for goat hunting unless closed by past or future special action.

DISTRIBUTION:

RADIO

KHOO Radio-Hoonah Community FM Radio; KCAW radio – Sitka; KIFW radio – Sitka; KSBZ radio – Sitka

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GOVERNMENT ORGANIZATIONS

Hoonah Indian Association; City of Hoonah; City of Tenakee; City of Sitka; Sitka Tribe of Alaska; Stephen Bethune, ADF&G Division of Wildlife Conservation Sitka, City of Pelican, City of Angoon, Angoon Community Association; Michael Bangs, Southeast Regional Subsistence Advisory Council Chair; Earl Stewart, Forest Supervisor; Jeff Bryden, Subsistence L.E.O; Carol Lagodich, Tongass Public Affairs-Ketchikan; Paul Robbins Jr., Public Affairs Officer, USFS – Ketchikan; Theo Matuskowitz, Office of Subsistence Management - Anchorage; Paul McKee, Office of Subsistence Management – Anchorage; Thomas Whitford, Subsistence Program Leader, USFS-Anchorage; Terry Suminski, Tongass Subsistence Program Leader, USFS-Sitka; Alaska Department of Public Safety.



Federal Subsistence Board

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FOREST SERVICE

LAKE DIANA ZONE ON BARANOF ISLAND IN UNIT 4 CLOSED TO THE HARVEST OF MOUNTAIN GOATS

SPECIAL ACTION: FEDERAL SUBSISTENCE BOARD

Under authority of: 36 CFR 242.10 and .19
50 CFR 100.10 and .19

Special Action No: 13-MG-03-17

Issued at: Sitka Alaska, August 14, 2017

Effective Date: 11:59 p.m. Thursday, August 17, 2017

Expiration Date: 11:59 p.m. Sunday, December 31, 2017 unless superseded by subsequent special action

EXPLANATION:

This Special Action closes the Lake Diana zone on Baranof Island near Sitka, Alaska to the harvest of mountain goats.

REGULATION: 36 CFR 242.26(n)(4) and 50 CFR 100.26(n)(4) are amended to read:

Unit 4 – Mountain Goat

1 goat by State registration permit only.

Aug. 1 - Dec. 31

Lake Diana is closed – Drainages south of Redoubt Lake Creek, east of West Crawfish Inlet Creek to Redoubt Lake Creek, west of Lake Ekaterina/Creek to the pass into Upper Benzeman Creek; and west of Upper Benzeman Creek and the ridge between Peaks 4435 and 4358.

Aug. 18 – Dec. 31

The Pyramids – Drainages north of Redoubt Lake, west of Redoubt Lake Trail and south of Silver Bay, including Deep Inlet and Eureka Mtn.

Closed

Slaughter Ridge – Drainages north of Katlian Bay, west of Coxe River, east of Nakwasina Sound and south of Nakwasina River downstream of Cold Storage Lake pass, but excluding the Lisianski Peninsula.

Indian River - Drainages of Sitka Sound between Katlian River and Sawmill Creek, north of Sawmill Creek, south of south fork Katlian River and west of Clarence Creek, including Indian River, Granite Creek, Starrigavan Creek, and the Mt. Verstovia/Arrowhead ridge.

Bear Mountain – Silver Bay drainages between Sawmill and Medvejie Creeks, south of Blue Lake/Creek, west of the south fork Blue Lake Creek and northwest of Medvejie Creek to Baranof Pass.

Rosenberg Lake – North fork Nakwasina River drainages upstream of the Peak 3098 Creek confluence, south of the north fork Nakwasina River downstream of the Peak 3098 Creek confluence, and Rosenberg Lake/Creek drainages.

Lake Irina – Drainages south of Redoubt Lake, north of West Crawfish Inlet and west of their respective inlet streams, but excluding the Kliuchef Peninsula.

Indigo Lake - Drainages north of Vodopad River and Green Lake downstream of the creek originating from Peak 4130, east of Silver Bay and southeast of Medvejie Creek/Lake to Baranof Pass, including Indigo Lake and Cupola (Cross) Peak.

Necker Bay – The peninsulas west of Small Arm Whale Bay/Creek, west of Benzeman Lake and southeast of Crawfish Inlet, but excluding Aspid Cape.

Lucky Chance - Drainages east of the Redoubt Lake Trail, north of Redoubt Lake Creek; and south of Green Lake and the Vodopad River, including Lucky Chance Mountain.

North Kelp Bay - Drainages east of Lake Eva Creek and north of Middle Arm Kelp Bay/Creek downstream of Lake Eva Creek pass.

Kasnyku/Takatz - Chatham Strait drainages between Kelp Bay and Triple Lake Creek, including Kasnyku and Takatz Bays.

Whale Bay – Drainages east of Small Arm Whale Bay/Creek, east of Benzeman Lake, west of Great Arm Whale Bay/Creek to the pass at Peak 2907 and drainages of Politofski Lake.

South Baranof - Drainages south of Gut Bay and the east branch of Great Arm Whale Bay and their respective inlet streams; and north of the divide between Larch Bay and Port Conclusion.

Federal Subsistence Board by delegation to /s/Perry Edwards
Perry Edwards
District Ranger
Sitka Ranger District
August 14, 2017

JUSTIFICATION:

Based on aerial surveys, historical harvest and vulnerability to harvest, biologists have set a maximum guideline harvest objective of five male goats or one female goat in the Lake Diana zone. As of Monday, August 14, one male goat and one female goat have been harvested. Continued mountain goat harvest in this area would be detrimental to the long term conservation of the mountain goat population.

Data from collared goats near Sitka documented that goats have high fidelity to small home ranges and are slow to recolonize vacant habitat. That finding combined with high localized harvest in more accessible areas lead managers to develop an updated management strategy for mountain goats on Baranof Island beginning with this 2017 season. Baranof Island was divided into 34 small hunt zones. Dividing Baranof Island into more zones allows biologists to manage at the subpopulation level, which should afford hunters more opportunities and reduce the possibility of localized overharvest. Under the previous management strategy, quotas were based on larger geographical areas, which sometimes included several subpopulations. The quota for a large zone could be reached after several goats were taken from a small area around a single access point. That resulted in the large area being closed while additional harvest opportunity remained in more remote portions of that larger zone. This new strategy of subdividing large zones should provide more opportunity for hunters by allowing more remote zones to stay open after zones with easier access close.

A public hearing to discuss the 2017 Baranof Island Mountain Goat Management Plan was held on July 20th, 2017 in Sitka, Alaska. The ability to teleconference was provided so residents of other affected communities could participate. Members of the public who attended were supportive of conserving mountain goats on Baranof Island through closures guided by the management plan. The 2017 management plan is similar to the 2016 plan with distinct male and female guideline harvest levels by zones on Baranof Island. Female harvest is more restrictive than male harvest when applied to the guideline harvest levels. As the guideline harvest levels in each of the zones are reached, those zones will be closed to mountain goat harvest.

The remainder of Baranof Island will remain open for goat hunting unless closed by past or future special action.

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FEDERAL SUBSISTENCE FISHERY FOR EULACHON CLOSED IN DISTRICT ONE

SPECIAL ACTION: FEDERAL SUBSISTENCE BOARD

Under Authority of: 50 CFR Part 100. 27(i)(13)(i) and (ii)
36 CFR Part 242. 27(i)(13)(i) and (ii)

Special Action No: 13-EU-01-17

Issued at: Ketchikan, Alaska, March 2, 2017

Effective Date: Monday, March 6, 2017 12:01 AM

Expiration Date: Wednesday, May 4, 2017 11:59 PM, unless superseded by subsequent special action.

EXPLANATION: This Special Action closes Federal public waters draining into District 1 to the taking of eulachon. The closure begins on Monday, March 6, 2017 at 12:01 a.m. and continues through 11:59 p.m. May 4, 2017. All eulachon incidentally caught must be immediately released into the water unharmed. Subsistence fishing for species other than eulachon in drainages flowing into District 1 continues to be permitted. All lawful subsistence gear for species other than eulachon may continue to be used in Federal public waters. The Alaska Department of Fish and Game (ADF&G) has also implemented a similar closure within the entirety of District 1 for the State subsistence, personal use and commercial fisheries.

REGULATION: 50 CFR 100.27(i)(13)(i) is amended to read: (i) Unless restricted in this section or under the terms of a subsistence fishing permit, you may take fish other than salmon, trout, grayling, and char in the Southeastern Alaska Area at any time. (ii) You must possess a subsistence fishing permit to take salmon, trout, grayling, or char.

§ 100.27(i)(13)(ii) You must possess a subsistence fishing permit to take salmon, trout, grayling, or char. You must possess a subsistence fishing permit to take eulachon from any freshwater stream flowing into fishing Sections 1C or 1D. Eulachon may not be taken from waters draining into District 1 from 12:01 a.m., March 6 through May 4, 2017, 11:59 p.m.

Federal Subsistence Board by delegation to:

/s/ Jeff DeFreest
JEFF DEFREEST
District Ranger
Ketchikan-Misty Fiords Ranger District
2 March 2017

JUSTIFICATION: Populations of eulachon in District 1 have been at critically low levels since 2005. Monitoring efforts made by the Forest Service, ADF&G, and fisherman since 2001 have provided base line information that indicated a decline in the populations of District 1 eulachon. Although river surveys have occurred to document adult returns, little is still known about the eulachon after they leave river systems for saltwater.

District 1 historically supported subsistence, personal use and commercial fisheries for eulachon. In 2004, only 1500 pounds of eulachon were harvested and very low numbers of returning eulachon were seen by both subsistence fisherman and Forest Service personnel. From 2005 through 2010, very few eulachon were seen annually in the area during this period.

Due to the sharp declines in the overall number of eulachon, along with critically low numbers returning to the area, portions of District 1 have been closed since 2005. Managers are starting to see signs of a stock recovery. From 2011-2015, unknown sized returns of eulachon occurred in both Burroughs Bay and also in the Carroll Inlet area. Eulachon again returned to the area in 2016, however in far less abundance than seen during the previous years. Genetic analysis of Carroll Inlet fish showed these fish to be genetically similar to Unuk River eulachon.

Despite these returns, the stock sizes within District 1 still remain at critically low levels. With the stocks at these levels, there are few options available to managers for conservation other than closure. The eulachon life cycle is typically five years. Based on the numbers observed for the last three years it is not likely a harvestable surplus will be available in 2017. It is anticipated that all eulachon returning to District 1 in 2017 will be needed for spawning to rebuild the area eulachon returns. Therefore, Federal public waters draining into District 1 will be closed to the taking of eulachon by all users in 2017 to provide for conservation of eulachon.

DISTRIBUTION:

RADIO

KBRD Radio; KCAW Radio; KRSA Radio

PRINT

Ketchikan Daily News; Sitka Sentinel; Juneau Empire

GOVERNMENT ORGANIZATIONS

Michael Bangs, Chair, Southeast Alaska Regional Advisory Council; ADF&G Commercial and Sportfish Divisions-Ketchikan; Jeff Bryden, Subsistence L.E.O., USFS – Moose Pass; Bill Elsner, L.E.O., USFS-Ketchikan; Jordan Rymer, L.E.O. USFS-Ketchikan; Carol Lagodich, Public Affairs, USFS-Ketchikan; Terry Suminski, Tongass Subsistence Program Leader, USFS-Sitka;

Deanna Perry, Council Coordinator, USFS – Juneau; Thomas Whitford, Regional Subsistence Program Leader, USFS – Anchorage; Melinda Hernandez-Burke, Tribal Relations Program Manager, USFS – Juneau; Theo Matuskowitz, Regulations Specialist, OSM – Anchorage; Alaska Public Safety Department-Fish & Wildlife Protection Division, Ketchikan; Audrey Hudson, Mayor, Metlakatla Indian Community; Lee Wallace, President, Organized Village of Saxman; Organized Village of Saxman Council; Irene Dundas, President, Ketchikan Indian Corporation

STAFF ANALYSIS FSA17-02

ISSUES

Emergency Special Action Request, FSA17-02, submitted by the U.S. Forest Service Wrangell District Ranger (the Stikine River Federal in-season manager), requests the Federal Subsistence Board (Board) close the Chinook Salmon (*Oncorhynchus tshawytscha*) subsistence fishery on the Stikine River for the 2017 season. In addition, the in-season manager requests authority to rescind the closure if the in-season abundance estimate is large enough to produce a U.S. Allowable Catch under the conditions of the Pacific Salmon Treaty (Treaty) of 1985 between the U.S. and Canada.

DISCUSSION

The 2017 Stikine River pre-season terminal area abundance forecast is 18,300 large (>30 inches total length) Chinook Salmon. According to provisions in the Treaty, the terminal area pre-season run estimate must be greater than 28,100 large Chinook Salmon to produce an Allowable Catch for either the U.S. or Canada when managing for the mid-point of the escapement goal range (21,000). The U.S. Chinook Salmon Federal subsistence fishery is considered a “directed” fishery in the Treaty and directed fisheries are not allowed unless there is an U.S. Allowable Catch. However, the return estimate is large enough that the escapement goal should be met while allowing some incidental harvests in Treaty-authorized fisheries.

The Board has delegated in-season management authority to the Forest Service Wrangell District Ranger to “issue emergency special actions if necessary to assure the continued viability of a fish population, to continue subsistence uses of a fish population, or for reasons of public safety.” Because the impetus to act is not one of these three reasons, but is predicated on stipulations of the Pacific Salmon Treaty, the in-season manager is requesting that the Board take emergency action to close this fishery.

The applicable Federal regulations are found in 36 CFR 242.19(a) and 50 CFR 100.19(a) (Emergency Special Actions) and state:

... In an emergency situation, if necessary to ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons, the Board may immediately open or close public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for take for subsistence uses, or close public lands to take for nonsubsistence uses of fish and wildlife, or restrict the requirements for take for nonsubsistence uses of fish and wildlife, or restrict the requirements for take for nonsubsistence uses.

Existing Federal Regulation

§ ____.27(e)(13) (xiii) *You may take Chinook, sockeye, and coho salmon in the mainstem of the Stikine River only under the authority of a Federal subsistence fishing permit. Each Stikine River permit will be issued to a household. Only dip nets, spears, gaffs, rod and reel, beach seine, or gillnets not exceeding 15 fathoms in length may be used. The maximum gillnet mesh size is 5 1/2; inches, except during the Chinook season when the maximum gillnet mesh size is 8 inches.*

A) You may take Chinook salmon from May 15 through June 20. The annual limit is 5 Chinook salmon per household.

(B) You may take sockeye salmon from June 21 through July 31. The annual limit is 40 sockeye salmon per household.

(C) You may take coho salmon from August 1 through October 1. The annual limit is 20 coho salmon per household.

(D) You may retain other salmon taken incidentally by gear operated under terms of this permit. The incidentally taken salmon must be reported on your permit calendar.

(E) Fishing nets must be checked at least twice each day. The total annual guideline harvest level for the Stikine River fishery is 125 Chinook, 600 sockeye, and 400 coho salmon. All salmon harvested, including incidentally taken salmon, will count against the guideline for that species.

Proposed Federal Regulation

§ ____.27(e)(13) (xiv) *You may take Chinook, sockeye, and coho salmon in the mainstem of the Stikine River only under the authority of a Federal subsistence fishing permit. Each Stikine River permit will be issued to a household. Only dip nets, spears, gaffs, rod and reel, beach seine, or gillnets not exceeding 15 fathoms in length may be used. The maximum gillnet mesh size is 5 1/2; inches, except during the Chinook season when the maximum gillnet mesh size is 8 inches.*

*(A) ~~You may take~~ **The Chinook salmon fishery is closed from May 15 through June 20. The annual limit is 5 Chinook salmon per household. The in-season manager is authorized to rescind the closure when there is a U.S. Allowable Catch.***

(B) You may take sockeye salmon from June 21 through July 31. The annual limit is 40 sockeye salmon per household.

(C) You may take coho salmon from August 1 through October 1. The annual limit is 20 coho salmon per household.

(D) You may retain other salmon taken incidentally by gear operated under terms of this permit. The incidentally taken salmon must be reported on your permit calendar.

(E) Fishing nets must be checked at least twice each day. The total annual guideline harvest level for the Stikine River fishery is 125 Chinook, 600 sockeye, and 400 coho salmon. All salmon harvested, including incidentally taken salmon, will count against the guideline for that species.

Existing State Regulation

The Stikine River and tributaries are open to sport fishing for Sockeye, Pink, Chum, and Coho Salmon with a harvest limit of 6 fish daily and 12 in possession. State sport fishing regulations prohibit fishing for Chinook Salmon in the Stikine River. Sport fishing for Chinook Salmon in the terminal area marine waters at the mouth of the Stikine River, adjacent to the waters under Federal subsistence fisheries jurisdiction, is allowed. The Alaska Board of Fisheries has made a positive customary and traditional use determination for salmon in the Stikine River but no State subsistence fishery is permitted for taking salmon of Stikine River origin, either in-river or in the terminal area marine waters adjacent to the waters under Federal subsistence fisheries jurisdiction. The Stikine River terminal area waters are located in fishing District 8. The Chinook, Sockeye and Coho Salmon commercial fisheries are managed in accordance with the Transboundary Rivers Annex of the Pacific Salmon Treaty (PSC 2012).

Existing Pacific Salmon Treaty Language

Article XI: Domestic Allocation

1. This Treaty shall not be interpreted or applied so as to affect or modify existing aboriginal rights or rights established in existing Indian treaties and other existing federal laws.

Annex IV: (amended June 30, 1999; December 4, 2002; February 18, 2005 and January 1, 2009)

Chapter 1: Transboundary Rivers

The provisions of this Chapter shall apply for the period 2009 through 2018.

3. Recognizing the objectives of each Party to have viable fisheries, the Parties agree that the following arrangements shall apply to the United States and Canadian fisheries harvesting salmon stocks originating in the Canadian portion of:

(a) The Stikine River:

(3) Chinook salmon:

(i) This agreement shall apply to large (greater than 659 mm mid-eye to fork length) Chinook salmon originating in the Stikine River.

(ii) Both Parties shall take the appropriate management action to ensure that the necessary escapement goals for Chinook salmon bound for the Canadian portions of the Stikine River are achieved. The Parties agree to share in the burden of conservation. Fishing arrangements must take biodiversity and ecosystem requirements into account.

(iii) Consistent with paragraph 2 above, management of directed fisheries will be abundance-based through an approach developed by the Committee. The Parties agree to implement assessment programs in support of the abundance-based management regime.

(iv) Unless otherwise agreed, directed fisheries on Stikine River Chinook salmon will occur only in the Stikine River drainage in Canada, and in District 108 in the U.S.

- (v) Pursuant to this agreement, a directed U.S. subsistence fishery in U.S. portions of the Stikine River will be permitted, with a guideline harvest level of 125 Chinook salmon to be taken between May 15 and June 20. For this fishery:
- a. The fishing area will include the main stem of the Stikine River, downstream of the international border, with the exception that fishing at stock assessment sites identified prior to each season is prohibited unless allowed under specific conditions agreed to by both Parties' respective managers.
 - b. Catches will be reported weekly, including all incidentally caught fish. All tags recovered shall be submitted to the Alaska Department of Fish and Game.
 - c. A written report on the fishery summarizing harvests, fishing effort and other pertinent information requested by the Transboundary Panel will be submitted by the management agency for consideration by the Panel at its annual post season meeting.
 - d. Any proposed regulatory changes to the fishery during the remaining years of this annex would need to be reviewed by the bilateral Transboundary Panel and approved by the Pacific Salmon Commission.
- (vi) Management of Stikine River Chinook salmon will take into account the conservation of specific stocks or conservation units when planning and prosecuting their respective fisheries. To avoid over-harvesting of specific components of the run, weekly guideline harvests or other agreed management measures will be developed by the Committee by apportioning the allowable harvest of each Party over the total Chinook season based on historical weekly run timing.
- (vii) Commencing 2009, the Parties agree to implement through the Committee an agreed Chinook genetic stock identification (GSI) program to assist the management of Stikine Chinook salmon. The Parties agree to continue the development of joint GSI baselines.
- (viii) The Parties agree to periodically review the above-border Stikine River Chinook salmon spawning escapement goal which will be expressed in terms of large fish (greater than 659 mm mid-eye to fork length).
- (ix) A preseason forecast of the Stikine River Chinook salmon terminal run size will be made by the Committee by December 1 of each year.
- (x) Directed fisheries may be implemented based on preseason forecasts only if the preseason forecast terminal run size equals or exceeds the midpoint of the MSY escapement goal range plus the combined Canada, U.S. and test fishery base level catches (BLCs) of Stikine River Chinook salmon. The preseason forecast will only be used for management until inseason projections become available.
- (xi) For the purposes of determining whether to allow directed fisheries using inseason information, such fisheries will not be implemented unless the projected

terminal run size exceeds the bilaterally agreed escapement goal point estimate (NMSY) plus the combined Canada, U.S. and test fishery BLCs of Stikine River Chinook salmon. The Committee shall determine when inseason projections can be used for management purposes and shall establish the methodology for inseason projections and update them weekly or at other agreed intervals.

(xii) The allowable catch (AC) will be calculated as follows:

Terminal run = total Stikine Chinook run size minus the US troll catch of Stikine Chinook salmon outside District 108. base terminal run (BTR) = escapement target + test fishery BLC + U.S. BLC + Cdn BLC Terminal run – (BTR) = AC

(xiii) BLCs include the following:

- a. U.S. Stikine BLC: 3,400 large Chinook;*
- b. Canadian Stikine BLC: 2,300 large Chinook;*
- c. Test fishery: 1,400 large Chinook.*

Extent of Federal Public Waters

For purposes of this discussion, the phrase “Federal public waters” is defined as those waters described under 36 CFR 242.3 and 50 CFR 100.3.

All waters of the Stikine River downstream from the Canadian border are within the exterior boundaries of the Tongass National Forest and are considered Federal public waters for the purposes of Federal subsistence fisheries management. For the Stikine River, non-marine waters include all portions of the Stikine River inland from the point of Federal jurisdiction at Point Rothsay to the Canadian border (**Figure 1**).

Customary and Traditional Use Determinations

The Stikine River drains into commercial fishing District 8. Residents of drainages flowing into District 6 north of Point Alexander (Mitkof Island), residents of drainages flowing into Districts 7 and 8 (including the communities of Petersburg and Wrangell), and residents of the community of Meyers Chuck have a customary and traditional use determination for salmon, Dolly Varden, trout, smelt and eulachon.



Figure 1 Prominent geographic features of the Stikine River.

Regulatory History

The original proposal to establish a Federal subsistence salmon fishery on the Stikine River (FP01-27) was submitted in 2000 by Mr. Dick Stokes, a resident of Wrangell. That proposal specified a Chinook Salmon fishery from June 1-Aug. 1, a Sockeye Salmon fishery from June 15-Sept. 1, and a Coho Salmon fishery from July 15-Oct. 1. The Board deferred action on this proposal, pending coordination with the Pacific Salmon Commission (PSC).

In 2004, the Board made a customary and traditional use determination for salmon, Dolly Varden, trout, smelt and eulachon for residents living in or near the communities of Wrangell, Petersburg and Meyers Chuck (FP04-29). The Board also adopted methods, a season, and guideline harvest limits for Chinook, Sockeye, and Coho Salmon (FP04-40). The Transboundary Panel and the Pacific Salmon Commission concurred with the Board and a Federal subsistence fishery for Sockeye Salmon was opened during the 2004 season, but with a season starting date of July 1 instead of June 15. By action of the Board, and

coordination with the Transboundary Panel and PSC, directed fisheries for Chinook and Coho Salmon were added prior to the 2005 season. The Board approved (with concurrence of the PSC) a Special Action for a change in the mesh size from 5 ½ inches to 8 inches (FSA05-01) for the new Chinook Salmon fishery effective for the 2005 season. Regulatory changes for the 2006 season included an increase in the mesh size of gillnets during the Chinook Salmon fishery to 8 inch stretched mesh (FP06-27), and an earlier starting date for the Sockeye Salmon fishery (FP06-28 and 29). In 2008, two regulatory changes were made to the subsistence fishery. The first change made subsistence fishing permits valid for the length of the fishing season, May 15 through October 1. The second change moved the start date of the subsistence Coho Salmon fishery from August 15 to August 1 (FP08-03). Changing the Coho Salmon fishery start date allowed continuous subsistence fishing between May 15 and October 1. The in-season manager required 48 hour reporting of Chinook Salmon harvests in 2012 when the in-season abundance estimates indicated there might not be a Chinook Salmon Allowable Catch. In January 2013, the Board deferred action to April 2014 on a proposal (FP13-19) to increase or eliminate the guideline harvest level for the Federal subsistence Sockeye Salmon fishery. The Board's subsequent decision to eliminate the guideline harvest for Chinook, Coho and Sockeye Salmon is now pending review by the Pacific Salmon Commission prior to implementation. Regulatory changes for the 2015 season required subsistence fishers to check their nets two times per day (FP15-13). The Board closed the Chinook Salmon subsistence fishery prior to the start of the season in 2013 and 2014 due to the preseason run forecast being below 28,100 large Chinook Salmon. In both of those years, the in-season manager re-opened the fishery once the in-season projections were above 24,500 large Chinook Salmon. There were no in-season special actions during the 2015 or 2016 seasons.

Harvest in the Federal subsistence fisheries targeting Canadian-origin Stikine River salmon stocks is authorized by Federal regulations and described in Annex IV of the Treaty of 1985, as last amended in January 2009. Some requirements are contained wholly within Federal regulations, (i.e. annual household harvest limits and gear) some requirements are contained in both Federal regulations and the Treaty; (i.e. seasons and annual guideline harvest levels) and some requirements are specified only in Annex IV of the Treaty, (i.e. weekly harvest reporting and the requirement to submit an annual subsistence summary report).

Section 1(a)(3) of Annex IV of the Treaty provides a formula for determining whether there are sufficient Chinook Salmon returning to the terminal area to allow a directed fishery Allowable Catch. All references to numbers of Chinook Salmon in this section refer to large (greater than 30 inches total length) Chinook Salmon. Chinook Salmon smaller than 30 inches are not included as a component of the return nor are they counted as part of the catch, except that salmon between 28 inches and 30 inches total length taken in the U.S. commercial troll and sport fisheries are counted as large Chinook Salmon. Chinook Salmon less than 30 inches that are taken in gillnet, test and subsistence/food fisheries are reported as jack Chinook Salmon. The Chinook Salmon "Allowable Catch" is the number of large Chinook Salmon remaining after allowances for the mid-point of the escapement goal and the anticipated "base level" harvests. The average catches of Canadian sport, aboriginal food and commercial fisheries are components of the Canadian Base Level Catch. The average catches of U.S. sport, commercial troll and gillnet fisheries are components of the U.S. Base Level Catch (BLC). The average test fishery catch

(tag recovery fishery in Canada) is the third component of the Base Level Catch. The subsistence fishery was not in place when the Base Level Catches were calculated and is identified as a directed fishery.

The language in Annex IV does not allow directed fisheries if the pre-season forecast return of large Chinook Salmon to the terminal area (State commercial fishing District 8) does not equal or exceed 28,100 large Chinook Salmon. This number represents the mid-point of the maximum sustained yield escapement goal range (14,000-28,000 large Chinook Salmon), plus the combined Canada-U.S. and test fishery base level catches (BLCs) of 7,100 large Chinook Salmon ($21,000+7,100=28,100$). The U.S. commercial and sport fishery BLC is 3,400 large Chinook Salmon harvested in the terminal area, the Canadian BLC is 2,300 large Chinook Salmon, and the test fishery BLC is 1,400 large Chinook Salmon ($3,400+2,300+1,400=7,100$).

The Treaty mandates each party take action in their fisheries to reduce BLCs if the terminal run is insufficient to provide for both escapement and the BLCs (Annex IV (3)(a)(3)(xvii)). In previous years, both countries have taken actions to reduce the size of their respective BLCs when there was little or no Allowable Catch. Actions planned by either the Canadian or U.S. managers to reduce BLCs in 2017 are unknown at this time, but it is likely the fishing areas and seasons in the commercial gillnet fishery for Sockeye will be reduced during the early-season and restrictions to bag limits in the District 8 sport fishery. The test fishery is used for stock assessment purposes and will likely continue as necessary to provide in-season abundance estimates based on catch-per-unit-effort and mark-recapture methodologies. In the event the run-size estimate is near the lower bounds of the escapement goal, the test fishery program will be modified or eliminated to reduce test-fishing mortalities.

The first of the weekly in-season terminal run estimates will be produced in late May based on an in-river test fishery and mark-recapture studies. Once an in-season abundance estimate is calculated, directed fisheries are allowed if the abundance estimate exceeds 24,500 large Chinook Salmon: 17,400 for escapement (current point estimate goal for large Chinook Salmon passage above the border; Pacific Salmon Commission 2012) plus the 7,100 Chinook Salmon from the total BLCs. The magnitude of the Chinook Salmon Allowable Catch estimate and the degree of uncertainty in the estimate are determining factors in deciding what management options are reasonably available to the Canadian and U.S. managers.

Previous deliberations by the Board have made it clear that the Federal Subsistence Management Program was expected to work within the framework of the Treaty to implement its responsibilities under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). ANILCA mandates a preference for subsistence uses on Federal public land and waters, and the Pacific Salmon Treaty provides the framework for sharing the Canadian origin salmon stocks on the Stikine River between the U.S. and Canada. Although ANILCA predates the Treaty, Article XI of the Treaty states that, "this Treaty shall not be interpreted or applied so as to affect or modify existing aboriginal rights or rights established in existing Indian treaties, and other existing federal laws". Each authority is valid and the two should be considered concurrently, to the extent possible.

Current Events Involving the Species

The Office of Subsistence Management, along with the Alaska Department of Fish and Game, held a public meeting in Wrangell on April 13, 2017, discussing Stikine River Chinook Salmon management for the 2017 season. During this meeting, the U.S. Forest Service accepted public comments on FSA17-02. The public meeting was attended by about 25 people, and lasted for approximately four hours. All presentations were well received, and there was no opposition to the upcoming restrictions for any of the Stikine River Chinook Salmon fisheries.

Biological Background

Chinook Salmon return to the Stikine River from late-April through early-July, and spawning takes place late-July to mid-September. Spawning occurs primarily in the Canadian portion of the drainage, but is mostly limited to the lower mainstem and tributaries of the Stikine due to natural barriers to salmon migration in the upper Stikine drainage. The primary spawning locations in the Stikine River drainage include: the Tahltan, Little Talhtan, Chutine, Katete, Craig, Barrington, and Tuya Rivers, along with the Beatty, Christina, Verrett, Shaks, Sixmile, Andrew, and Tashoots creeks (Pahlke and Etherton 1999, Bernard et al. 2000). Juveniles typically rear in the river for a year prior to out-migrating to the sea, where they generally rear in the open seas (Bernard et al. 2000). Mature adults return through Southeast Alaska passageways after spending 1 to 5 years at sea, and become vulnerable to sport and commercial fisheries prior to entering the mouth of the river (Pahlke et al. 2010). Predominate escapement age classes are 1.3 and 1.4, although ages 1.1, 1.2, 1.5 do occur in reduced numbers.

Assessment of the Stikine River Chinook Salmon stock is accomplished using the Stikine Chinook Management Model (SCMM), mark-recapture projects, and fish weirs. The SCMM model is based on a linear regression model of the weekly cumulative large Chinook Salmon CPUE at the sampling site near the mouth of the Stikine River and terminal size based on mark-recapture studies performed from 1996-2015 (Pacific Salmon Commission 2017). The mark-recapture project is run concurrently with the SCMM, and run-size estimates are based on the marked to unmarked ratio observed in the in-river commercial fishery and at the weirs. Using the SCMM model and mark-recapture estimates, managers are able to produce an in-season terminal run size estimate. The current maximum sustained yield escapement goal range is 14,000-28,000 large Chinook Salmon; however, for there to be a directed U.S. fishery there needs to be a pre-season run size forecast of 28,100 or more, large Chinook Salmon. This pre-season forecast represents the mid-point of the maximum sustained yield escapement goal range (21,000 large Chinook Salmon) plus the combined Canada-U.S., test fishery base level catches (BLCs) (7,100 large Chinook Salmon).

Harvest History

Between 1995 and 2001, the Alaska Department of Fish and Game issued in-river personal use fishery permits for Sockeye Salmon in the Stikine River. Participation in the personal use fishery was minimal, and only 28 Sockeye Salmon were reported harvested in 2001. The personal use fishery was not opened

in 2002 due to conservation concerns for the Tahltan stock, a Canadian tributary to the Stikine River. The State of Alaska Board of Fisheries made a positive customary and traditional use determination for the Stikine River in 2003. Currently, there is not a state subsistence fishery authorized in State regulations for the Stikine River.

Sport fishing for Chinook Salmon is prohibited in the U.S. portions of the Stikine River. There is a small harvest of other salmon species by sport fishers in U.S. tributaries to the Stikine River, but harvest numbers are too low to be included in any site-specific sport fishing harvest estimates (Fowler 2017, pers. comm.).

The only Chinook Salmon directed fishery in Canada is the in-river commercial gillnet fishery. A small, but unknown number of Chinook, Sockeye, and Coho Salmon, as well as steelhead are harvested by sport fishers in Canada. The Canadian aboriginal salmon fishery is not defined as a directed fishery.

Permits are required for Federal subsistence fishing on the Stikine River. Weekly harvest estimates are derived from telephone interviews and fishery performance data. The use of permits and in-season reporting are designed to provide Federal, State and Canadian fishery managers with real time subsistence fishery harvest estimates.

The Stikine River subsistence Chinook Salmon season opens on May 15 and ends on June 20. Fishers can retain Chinook Salmon taken incidentally during the subsequent Sockeye and Coho Salmon seasons and catches must be reported. The average household harvest of large Chinook Salmon taken during the Federal Chinook Salmon fishery season between 2005 and 2016 is 11 fish (**Table 1**).

Table 1 Stikine River Federal subsistence large Chinook Salmon Harvest totals.

Year	Chinook Harvest in-season (May 15-June 20)	Chinook Harvest post-season (June 21-October 1)	Total
2005	13	2	15
2006	13	24	37
2007	24	12	36
2008	8	17	25
2009	9	22	31
2010	14	47	61
2011	16	50	66
2012	16	37	53
2013	2	52	54
2014	3	53	56
2015	8	35	43
2016	1	21	22
Average	11	31	42

Other Alternatives Considered

One alternative is to take no action, and not approve the special action request. However, this could be viewed by the Transboundary Panel and the PSC as a violation of an international agreement by the Federal subsistence management program. A lack of action by the Board would jeopardize support by the Transboundary Panel for changes to the Treaty being sought by the Board to change or eliminate the subsistence salmon guideline harvest levels and redefine the Chinook Salmon fishery as something other than a directed fishery.

Effects of the Proposal

The effect of closing the Federal Chinook Salmon subsistence fishery pre-season will be to delay the harvest of subsistence salmon in the Stikine River until June 21 from the regular May 15 opening date. It is reasonable to assume the total annual subsistence harvest would be reduced by approximately 11 large Chinook Salmon (the 2005-2016 average total seasonal harvest). The addition of 11 large Chinook Salmon would have little significance on the escapement or management of the other U.S. and Canadian fisheries. If the Board delegates authority to the in-season manager to rescind the closure when there is an "Allowable Catch," the fishery could be opened prior to June 21. The number of Chinook Salmon harvested during the Chinook Salmon season is less than the number taken incidentally during the Sockeye and Coho Salmon seasons (the 2004-2016 average is 30 large Chinook Salmon). Delegating the in-season manager the authority to rescind the closure will promote timely action to open the subsistence fishery if abundance estimates allow for directed Chinook Salmon fisheries.

Closing the Federal Chinook Salmon fishery preseason may affect subsistence user's ability to harvest Chinook Salmon during the 2017 season. A reduction of Chinook Salmon harvest will likely have minimal effects on subsistence users due to the low annual average harvest on this system. However, if the in-season abundance estimate exceeds 24,500 large Chinook Salmon, the in-season manager may open the Chinook Salmon subsistence fishery. Additionally, subsistence fishers will have the opportunity to harvest Sockeye beginning June 21, and incidentally caught Chinook Salmon may be retained in this fishery. The average annual harvest of Chinook Salmon in the Sockeye Salmon fishery is almost three times higher than the harvest in the Chinook Salmon directed fishery.

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Fowler, P. 2017. Wrangell/Petersburg area sport fisheries management biologist. Personal communication: telephone (907-772-3801). Alaska Department of Fish and Game. Petersburg, AK.

Pacific Salmon Commission. 2017. Final estimate of transboundary river production, harvest and escapement and a review of joint enhancement activities in 2015. Pacific Salmon Commission Joint Transboundary Technical Committee. Vancouver, Canada.

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**ISC RECOMMENDATION
EMERGENCY SPECIAL ACTION
FSA17-02**

Support Emergency Special Action FSA17-02 that requests the Federal Subsistence Board to close the Chinook Salmon subsistence fishery on the Stikine River for the 2017 season and delegate authority to the in-season manager to rescind the closure if the in-season abundance estimate permits a U.S. Allowable Catch under the conditions of the Pacific Salmon Treaty (Treaty) of 1985.

Justification

In recommending support of FSA17-02, the ISC found the staff analysis on FSA 17-02 to be a thorough and accurate evaluation of the special action request. In consideration of FSA 17-02 and the staff analysis, the ISC justifies its recommendation for the following reasons:

- Delegating the in-season manager the authority to rescind the closure will promote timely action to open the subsistence fishery if abundance estimates allow for directed Chinook Salmon fisheries, and would allow for continued subsistence use of Chinook Salmon on the Stikine River.
- The current delegation of authority to the in-season manager does not allow for closure of the Stikine River Chinook Salmon subsistence fishery for reasons other than the continued viability of a fish population, to continue subsistence uses of a fish population, or for public safety. The delegated authority to close the subsistence fishery would allow the in-season manager to comply with the allocation provisions of the Treaty.
- Closing the Federal Chinook Salmon fishery preseason may affect subsistence users' ability to harvest Chinook Salmon during the 2017 season. However, a reduction of Chinook Salmon harvest will have minimal effects on subsistence users due to the low annual average harvest on this system. If the in-season abundance estimate exceeds 24,500 large Chinook Salmon, the in-season manager may open the Chinook Salmon subsistence fishery.
- In-season management authority for the Chinook Salmon Federal subsistence fishery will promote coordinated management of the Stikine River salmon fisheries among the State and Canadian fishery managers, the Transboundary Panel, and the Federal Subsistence Management Program.



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



FOREST SERVICE

MAY 08 2017

OSM 13035.FH

Robert Dalrymple
Wrangell District Ranger
U.S. Forest Service
P.O. Box 51
Wrangell, Alaska 99929-0051

Mr. Dalrymple:

This letter is in response to the Emergency Special Action Request (FSA17-02) you submitted February 17, 2017. The Request asks the Federal Subsistence Board (Board) to close the Stikine River Chinook Salmon subsistence fishery and delegate authority to the in-season manager to rescind the closure if an updated in-season abundance estimate is large enough to produce a U.S. Allowable Catch.

The Board reviewed this request and approved it on May 1, 2017. This temporary special action will expire at the conclusion of the Stikine River Chinook Salmon Federal Subsistence season (June 20) unless re-opened before that date by special action announced via the in-season manager if the in-season abundance estimate exceeds 24,500 large Chinook Salmon as allowed for in the U.S./Canada Pacific Salmon Treaty. Enclosed with this letter are copies of the original requests, the final analysis, the Interagency Staff Committee recommendation, and the news release.

Please contact Tom Doolittle with the Office of Subsistence Management with any questions at (907) 786-3871.

Sincerely,

Anthony Christianson
Chair

Enclosures

cc: Federal Subsistence Board

**Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management
Jennifer Hardin, Anthropology Division Supervisor, Office of Subsistence Management
George Pappas, Acting Fisheries Division Supervisor, Office of Subsistence Management
DeAnna Perry, Subsistence Council Coordinator, U.S. Forest Service
Administrative Record**



U.S. Fish and Wildlife Service
Bureau of Land Management
National Park Service
Bureau of Indian Affairs

Federal Subsistence Board News Release



Forest Service

For Immediate Release:
May 08, 2017

Contact: Eugene Peltola, Jr.
(907) 786-3888 or (800) 478-1456
subsistence@fws.gov

Federal Subsistence Board Closes Stikine River Chinook Salmon Subsistence Fishery

The Federal Subsistence Board (Board) has approved Emergency Special Action Request FSA17-02, which requested closure of the Stikine River Chinook Salmon subsistence fishery, and delegation of authority to the In-season Manager to rescind the closure if an updated in-season abundance estimate is large enough to produce a U.S. Allowable Catch. The Board closed the May 15–June 20, 2017 subsistence Chinook Salmon fishery on the Stikine River and delegated authority to the Wrangell District Ranger, the Federal In-season Manager for this area, to reopen the fishery if the in-season Chinook Salmon terminal area abundance allows a directed fishery.

The 2017 Stikine River pre-season terminal area abundance forecast is 18,300 large (>30 inches total length) Chinook Salmon. The U.S./Canada Pacific Salmon Treaty stipulates that a directed Chinook Salmon subsistence fishery is not authorized if the pre-season run estimate is less than 28,100 large Chinook Salmon. As a result, the Board has closed the 2017 subsistence Chinook Salmon fishery. The Board has also authorized the Wrangell District Ranger to re-open the season if the weekly in-season abundance exceeds 24,500 large Chinook Salmon, as allowed for in the Treaty. The closure of the Chinook Salmon fishery does not affect other Stikine River Federal subsistence fisheries beginning June 21, 2017.

For more information, contact Robert Dalrymple, U.S. Forest Service, Wrangell District Ranger, P.O. Box 51, Wrangell, Alaska 99929.

Additional information on the Federal Subsistence Management Program may be found on the web at www.doi.gov/subsistence or by visiting www.facebook.com/subsistencealaska.

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

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Winter 2018 Regional Advisory Council Meeting Calendar

February-March 2018

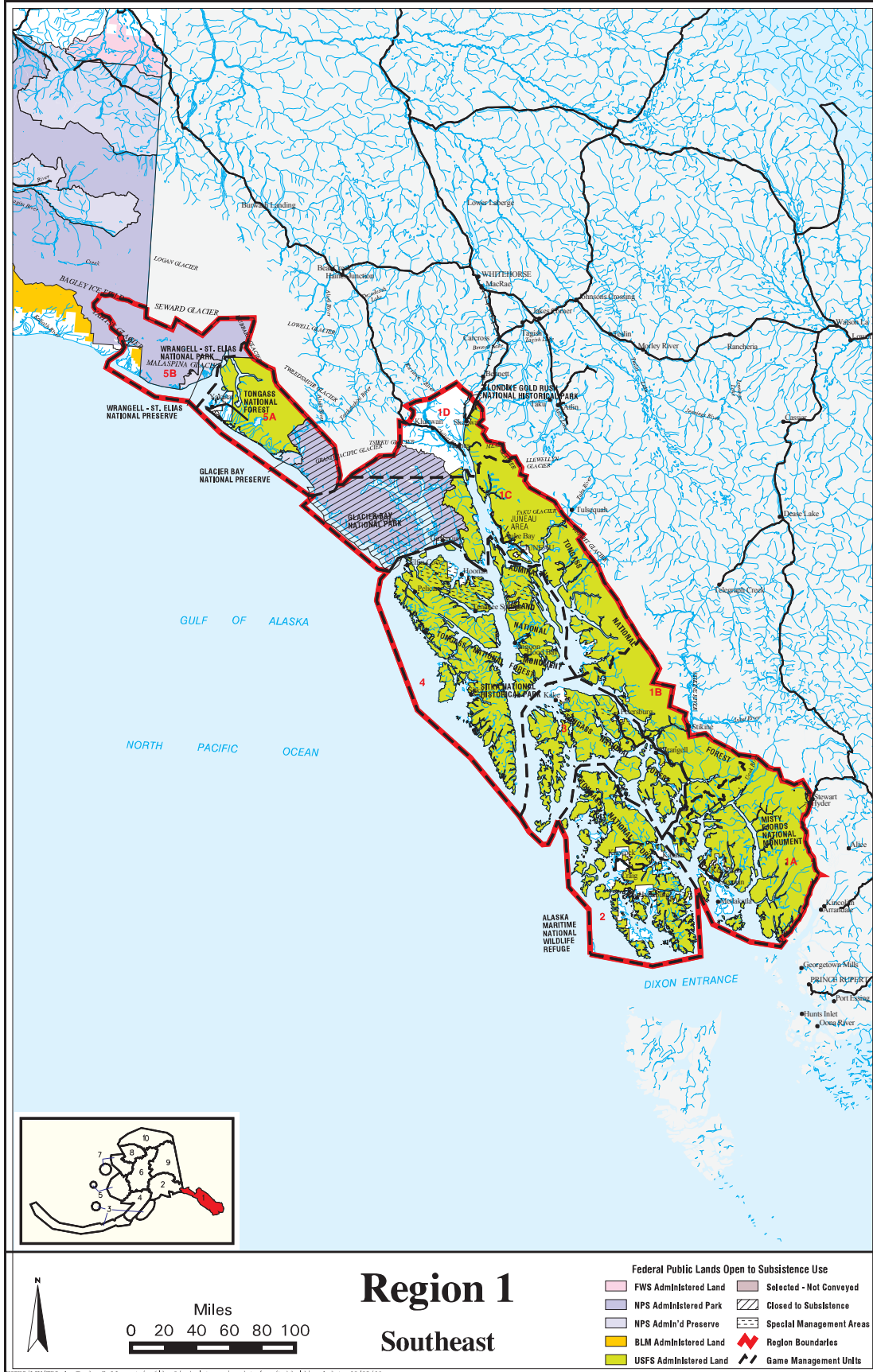
Meeting dates and locations are subject to change.

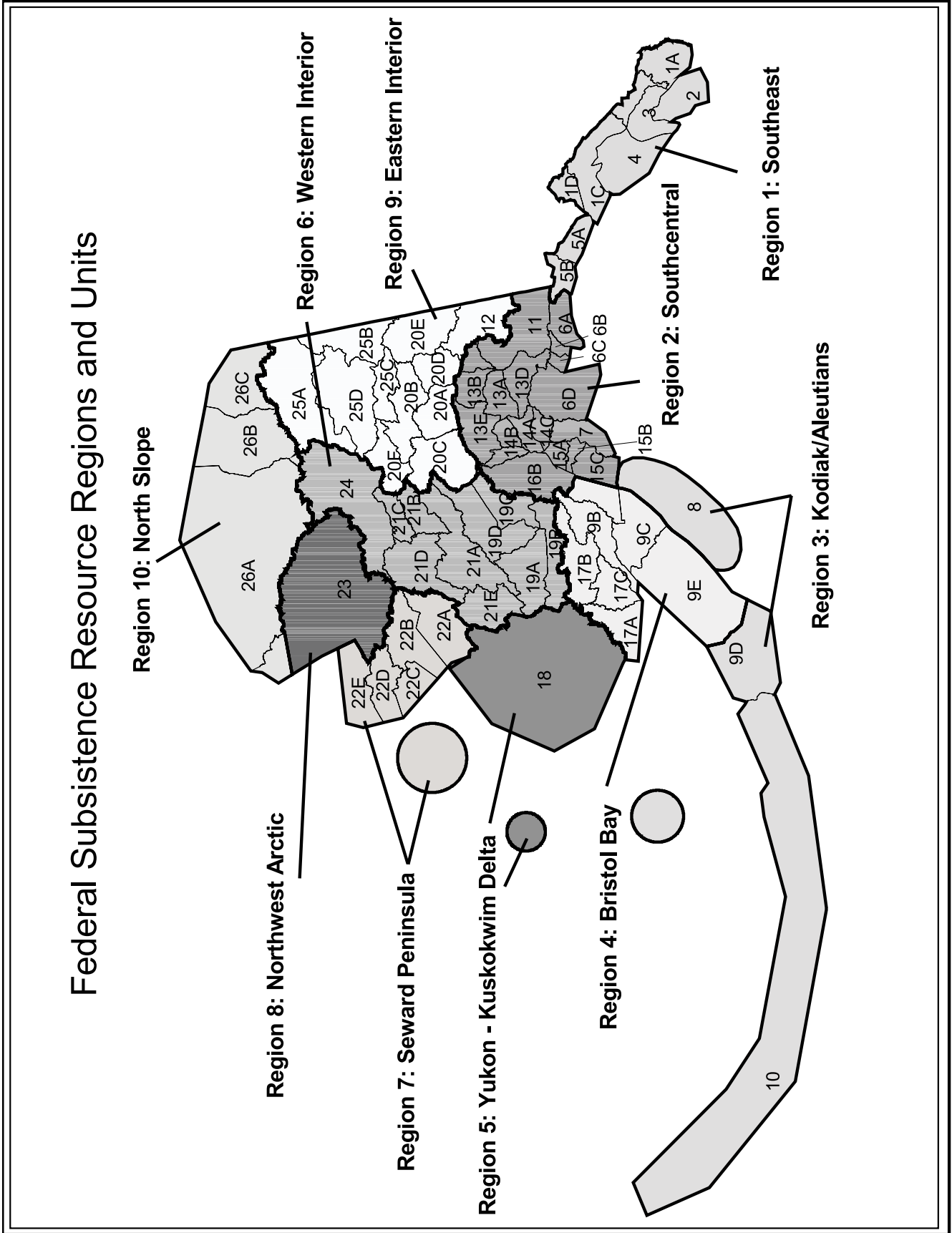
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Feb. 4	Feb. 5 <i>Window Opens</i>	Feb. 6	Feb. 7 EI — Fairbanks	Feb. 8	Feb. 9	Feb. 10
		SE — Wrangell				
Feb. 11	Feb. 12	Feb. 13	Feb. 14	Feb. 15	Feb. 16	Feb. 17
		NS — Utqiagvik				
Feb. 18	Feb. 19 PRESIDENT'S DAY HOLIDAY	Feb. 20	Feb. 21 KA — Kodiak	Feb. 22	Feb. 23	Feb. 24
		WI — Anchorage				
Feb. 25	Feb. 26	Feb. 27	Feb. 28	Mar. 1	Mar. 2	Mar. 3
		BB — Naknek (1st opt.)				
			NWA — Kotzebue			
Mar. 4	Mar. 5	Mar. 6	Mar. 7	Mar. 8	Mar. 9	Mar. 10
		SC — Anchorage				
	SP — Nome					
Mar. 11	Mar. 12	Mar. 13	Mar. 14	Mar. 15	Mar. 16 <i>Window Closes</i>	Mar. 17
			YKD — Bethel			
		BB — Naknek (2nd opt.)				

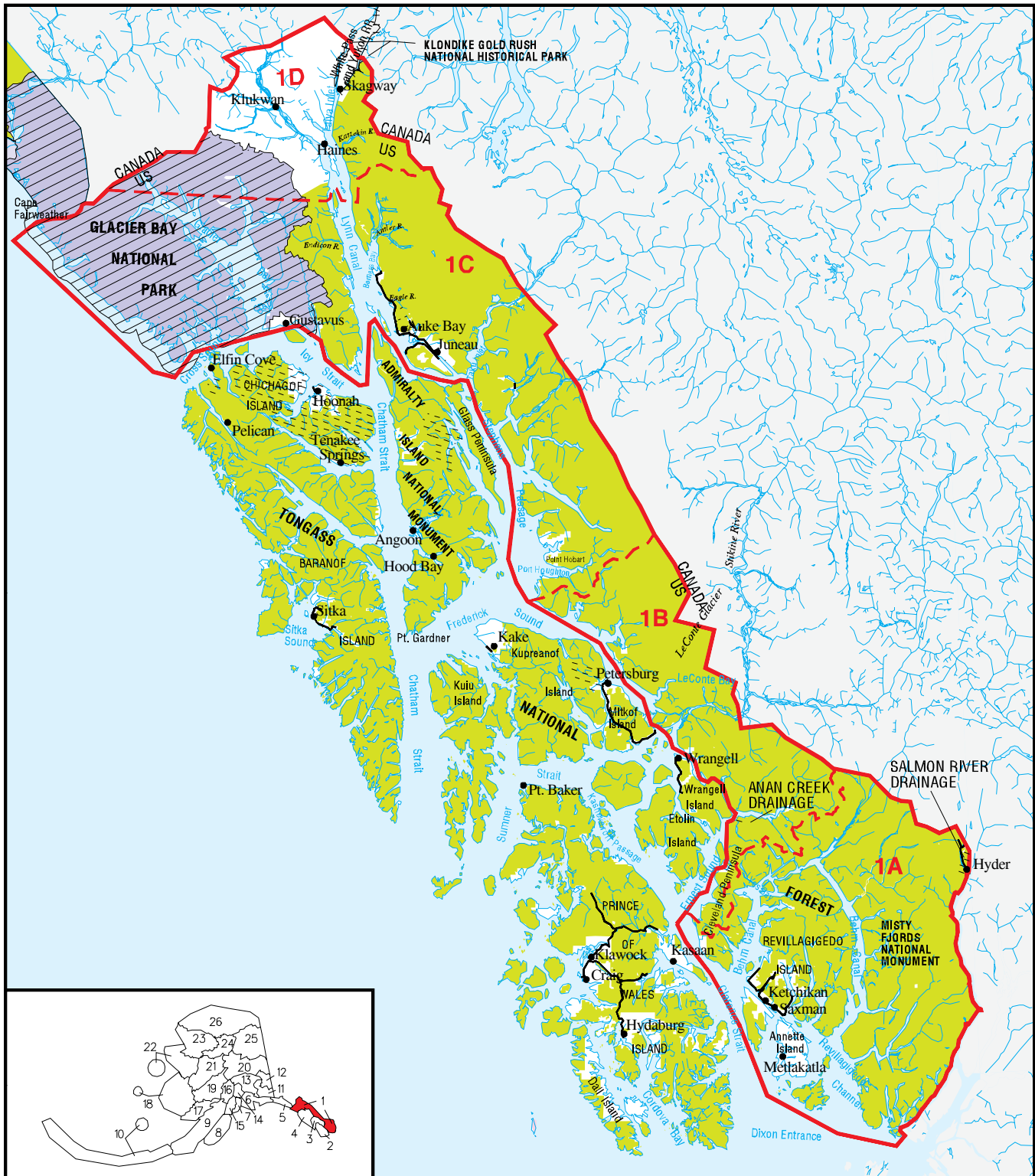
Fall 2018 Regional Advisory Council Meeting Calendar

Meeting dates and locations are subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<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>Sept. 1</i>
<i>Sept. 2</i>	<i>Sept. 3</i> LABOR DAY HOLIDAY	<i>Sept. 4</i>	<i>Sept. 5</i>	<i>Sept. 6</i>	<i>Sept. 7</i>	<i>Sept. 8</i>
<i>Sept. 9</i>	<i>Sept. 10</i>	<i>Sept. 11</i>	<i>Sept. 12</i>	<i>Sept. 13</i>	<i>Sept. 14</i>	<i>Sept. 15</i>
<i>Sept. 16</i>	<i>Sept. 17</i>	<i>Sept. 18</i>	<i>Sept. 19</i>	<i>Sept. 20</i>	<i>Sept. 21</i>	<i>Sept. 22</i>
<i>Sept. 23</i>	<i>Sept. 24</i>	<i>Sept. 25</i>	<i>Sept. 26</i>	<i>Sept. 27</i>	<i>Sept. 28</i>	<i>Sept. 29</i>
<i>Sept. 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> COLUMBUS DAY HOLIDAY	<i>Oct. 9</i>	<i>Oct. 10</i>	<i>Oct. 11</i>	<i>Oct. 12</i>	<i>Oct. 13</i>
<i>Oct. 14</i>	<i>Oct. 15</i>	<i>Oct. 16</i>	<i>Oct. 17</i>	<i>Oct. 18</i>	<i>Oct. 19</i>	<i>Oct. 20</i>
<i>Oct. 21</i>	<i>Oct. 22</i>	<i>Oct. 23</i>	<i>Oct. 24</i>	<i>Oct. 25</i>	<i>Oct. 26</i>	<i>Oct. 27</i>
<i>Oct. 28</i>	<i>Oct. 29</i>	<i>Oct. 30</i>	<i>Oct. 31</i>	<i>Nov. 1</i>	<i>Nov. 2</i>	<i>Nov. 3</i>
<i>Nov. 4</i>	<i>Nov. 5</i>	<i>Nov. 6</i>	<i>Nov. 7</i>	<i>Nov. 8</i>	<i>Nov. 9</i>	<i>Nov. 10</i>







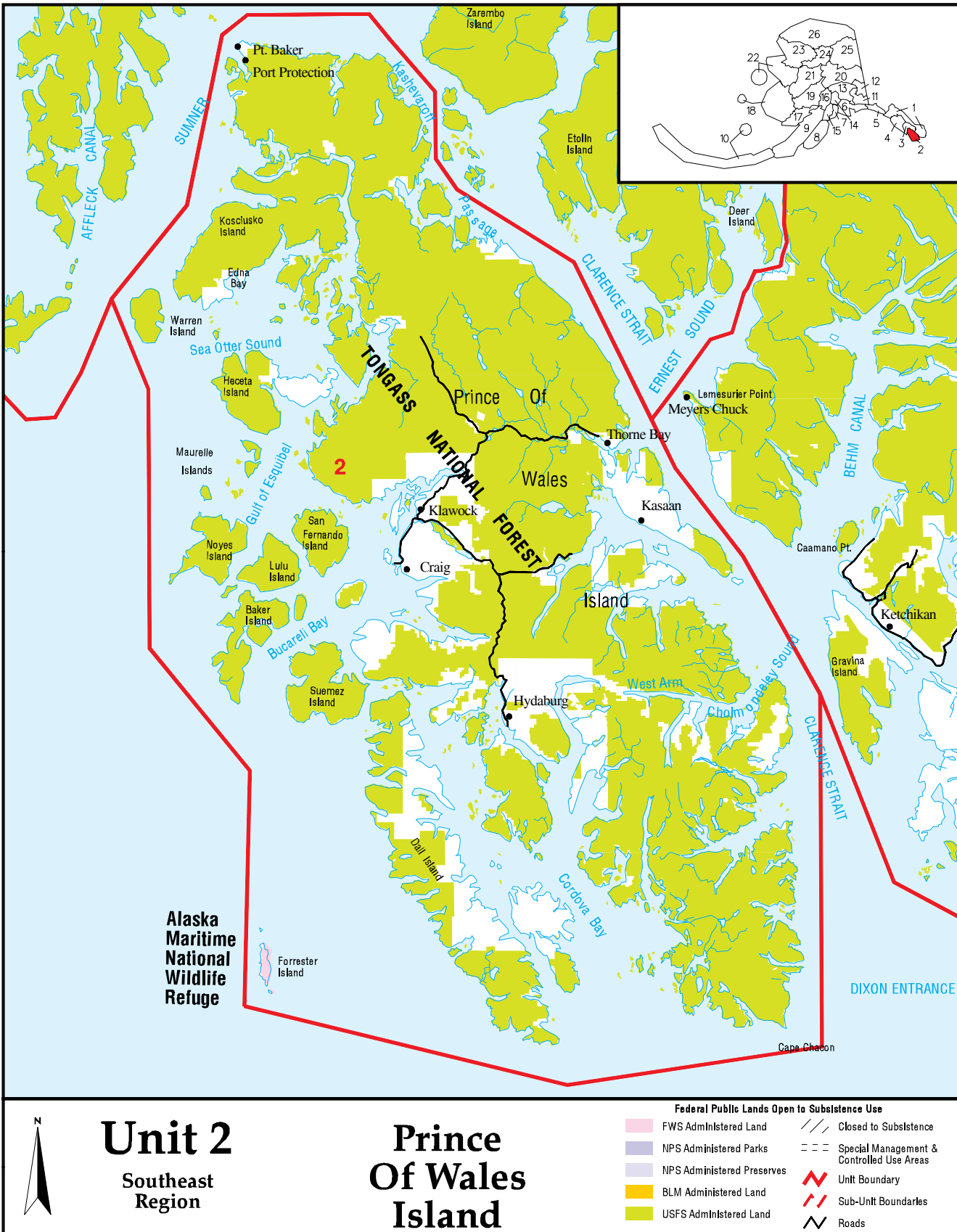
Unit 1

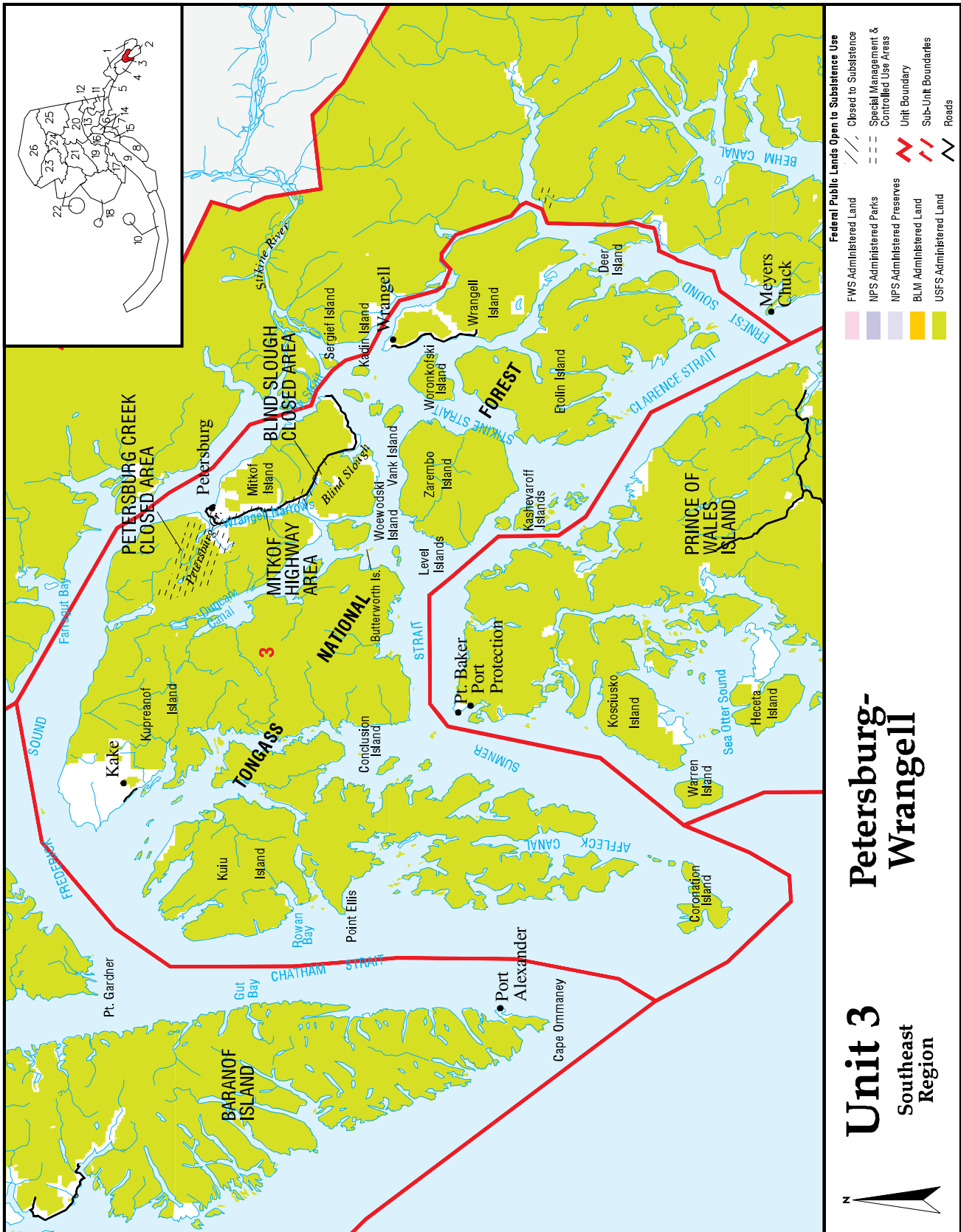
Southeast Mainland

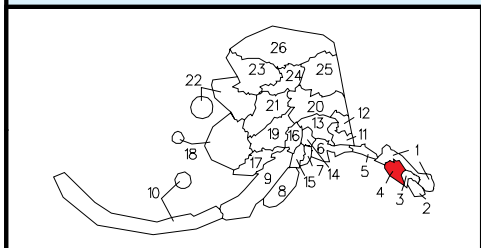
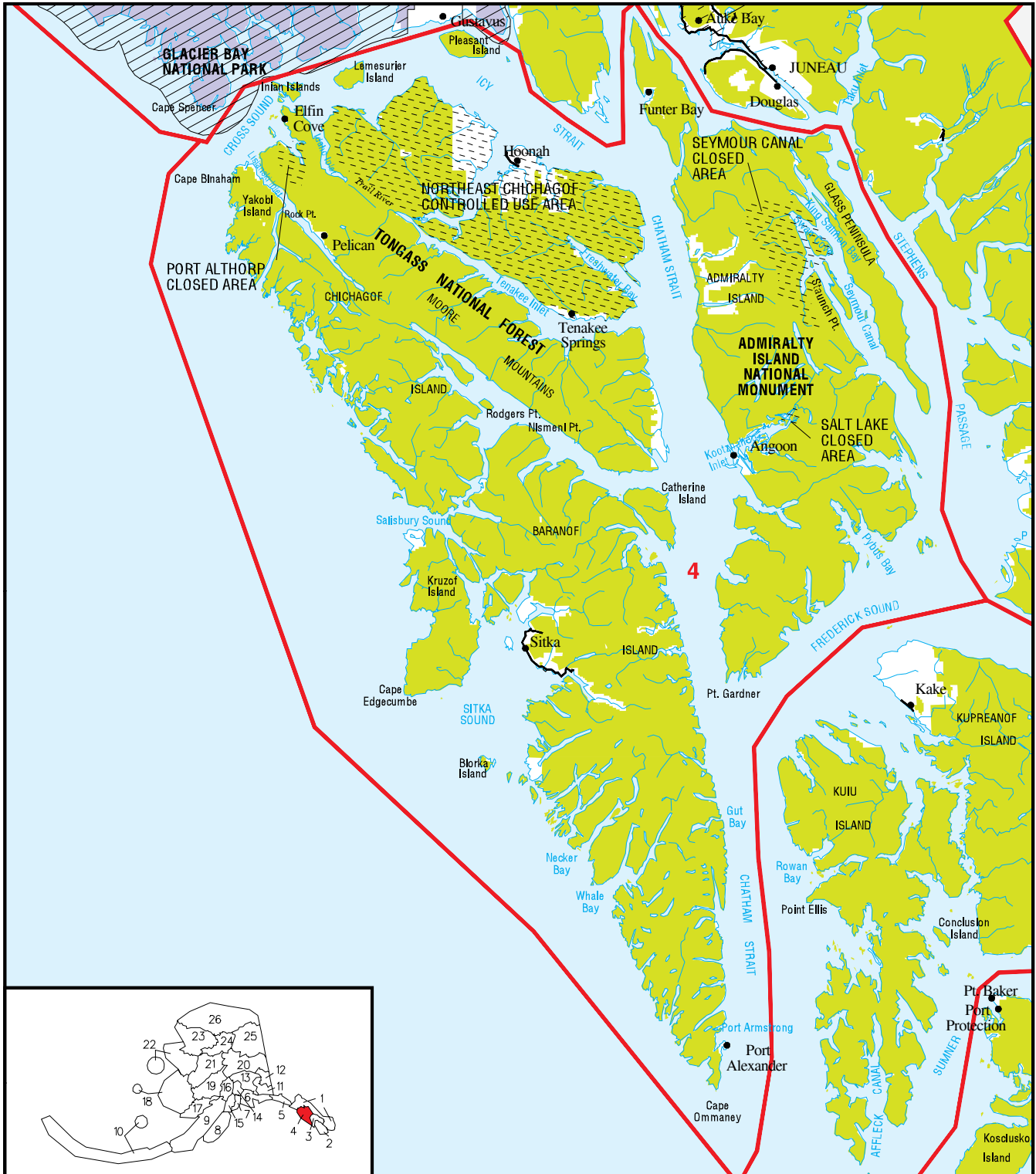
Southeast Region

Federal Public Lands Open to Subsistence Use

FWS Administered Land	Closed to Subsistence
NPS Administered Parks	Special Management & Controlled Use Areas
NPS Administered Preserves	Unit Boundary
BLM Administered Land	Sub-Unit Boundaries
USFS Administered Land	Roads





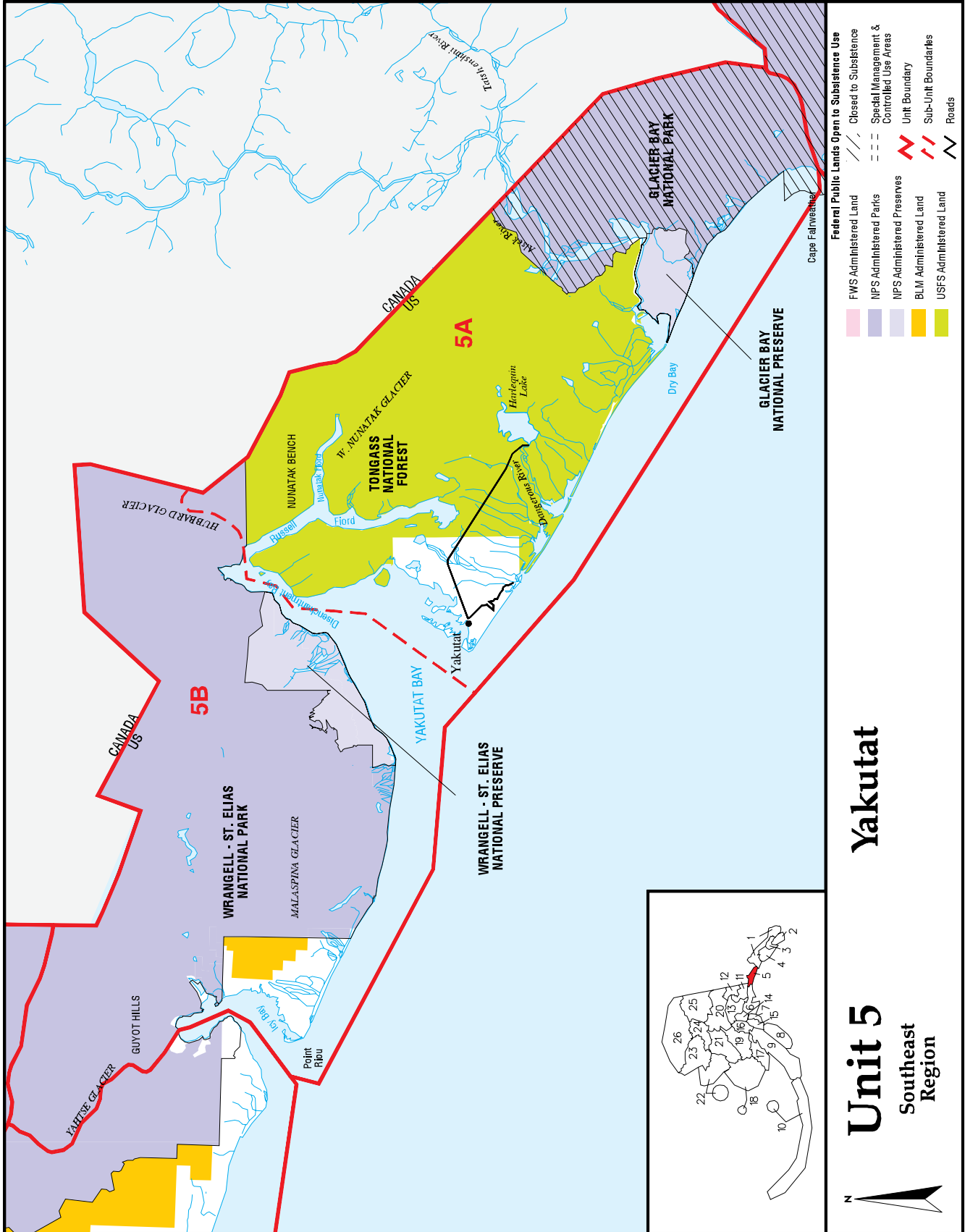


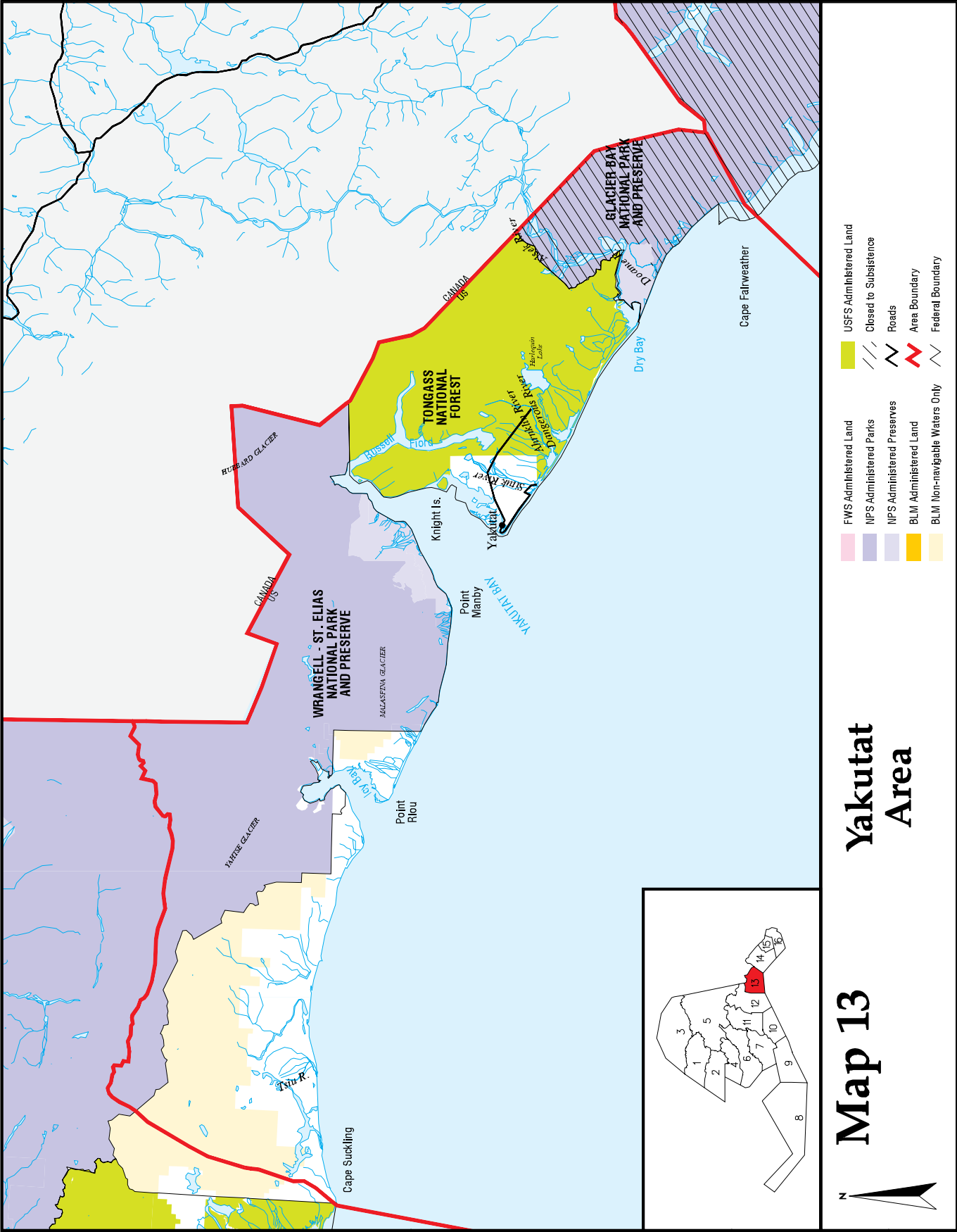
Unit 4
Southeast
Region

**Admiralty-
Baranof-
Chichagof Islands**

Federal Public Lands Open to Subsistence Use

 FWS Administered Land	 Closed to Subsistence
 NPS Administered Parks	 Special Management & Controlled Use Areas
 NPS Administered Preserves	 Unit Boundary
 BLM Administered Land	 Sub-Unit Boundaries
 USFS Administered Land	 Roads

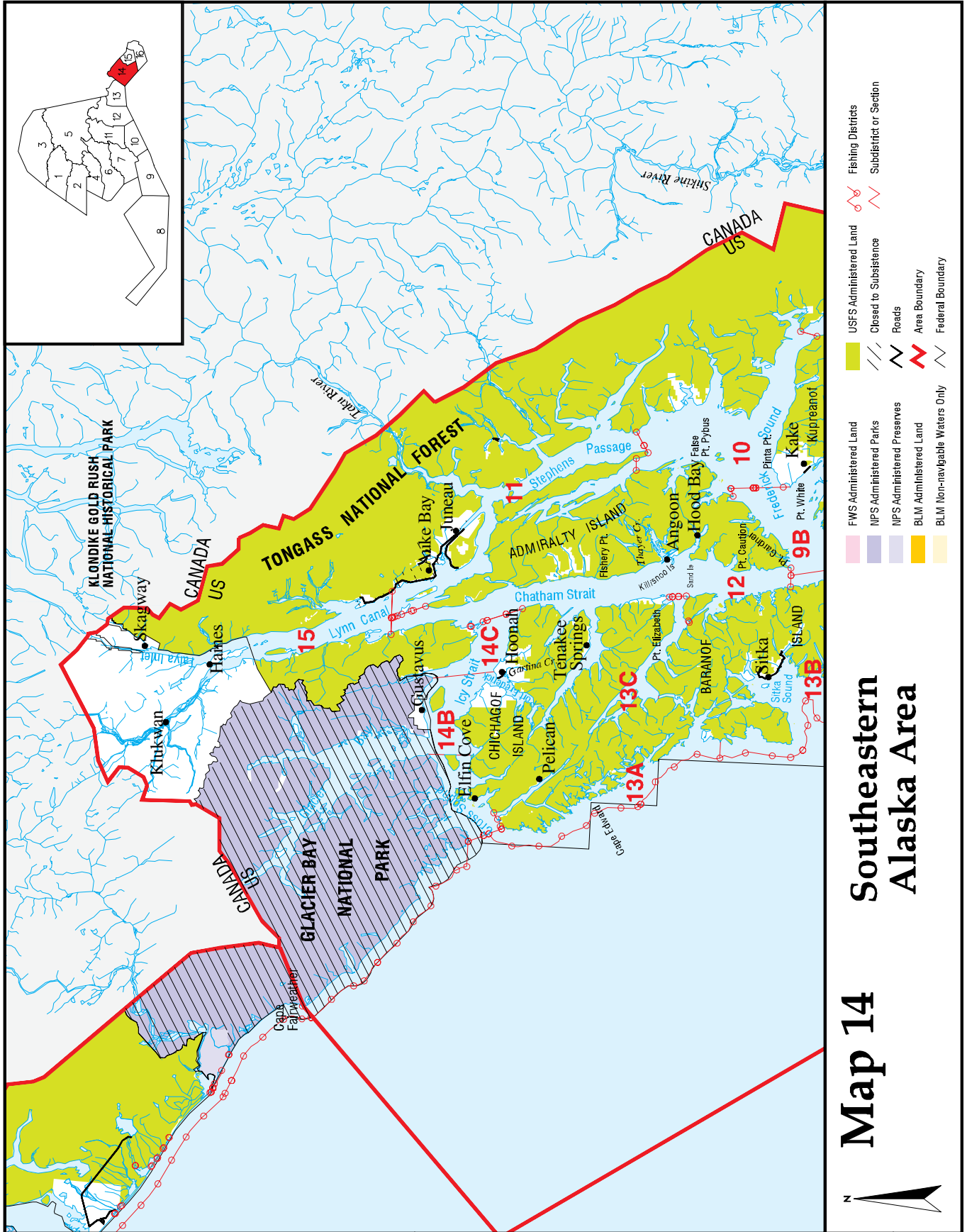


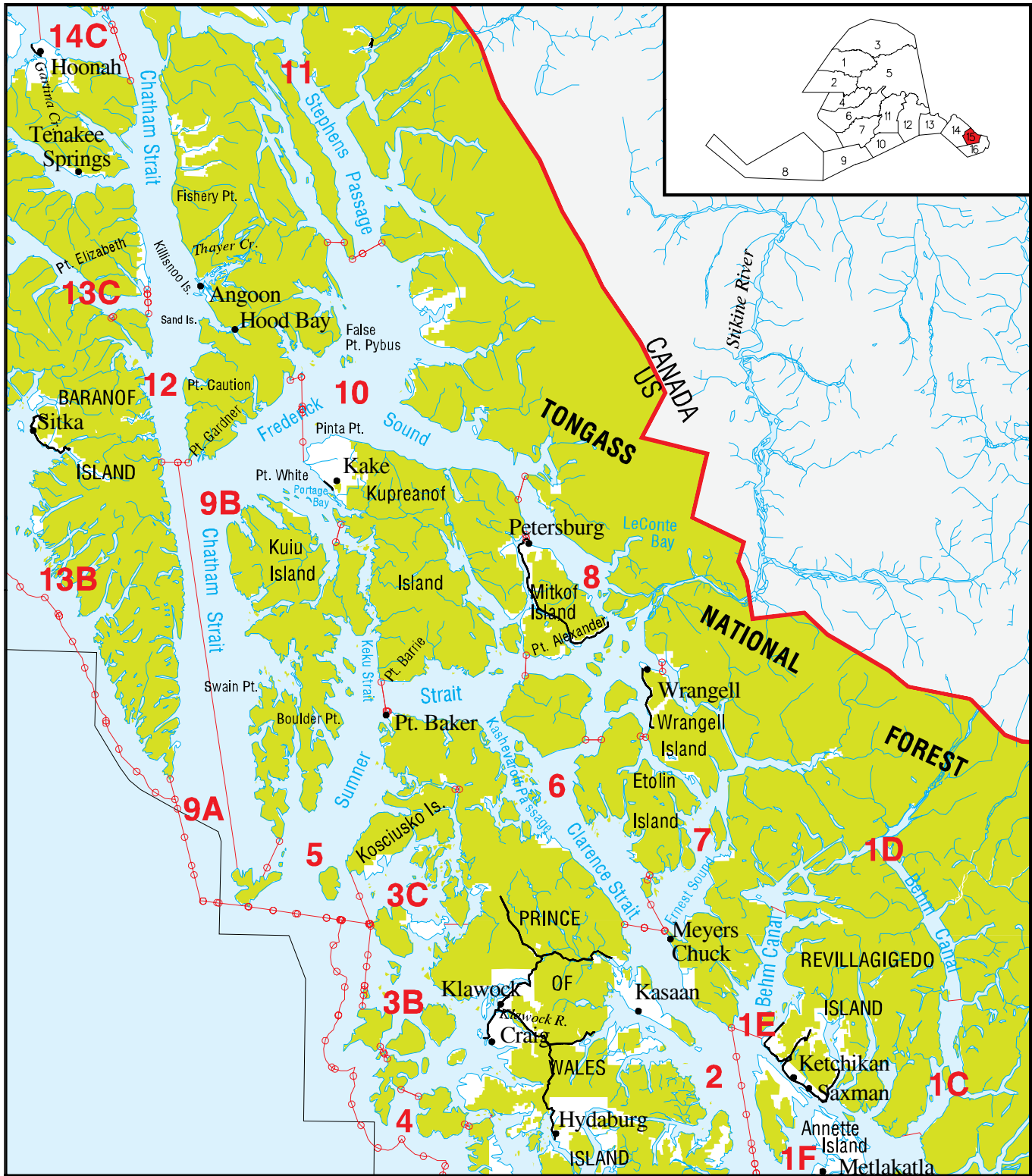


Yakutat Area

Map 13

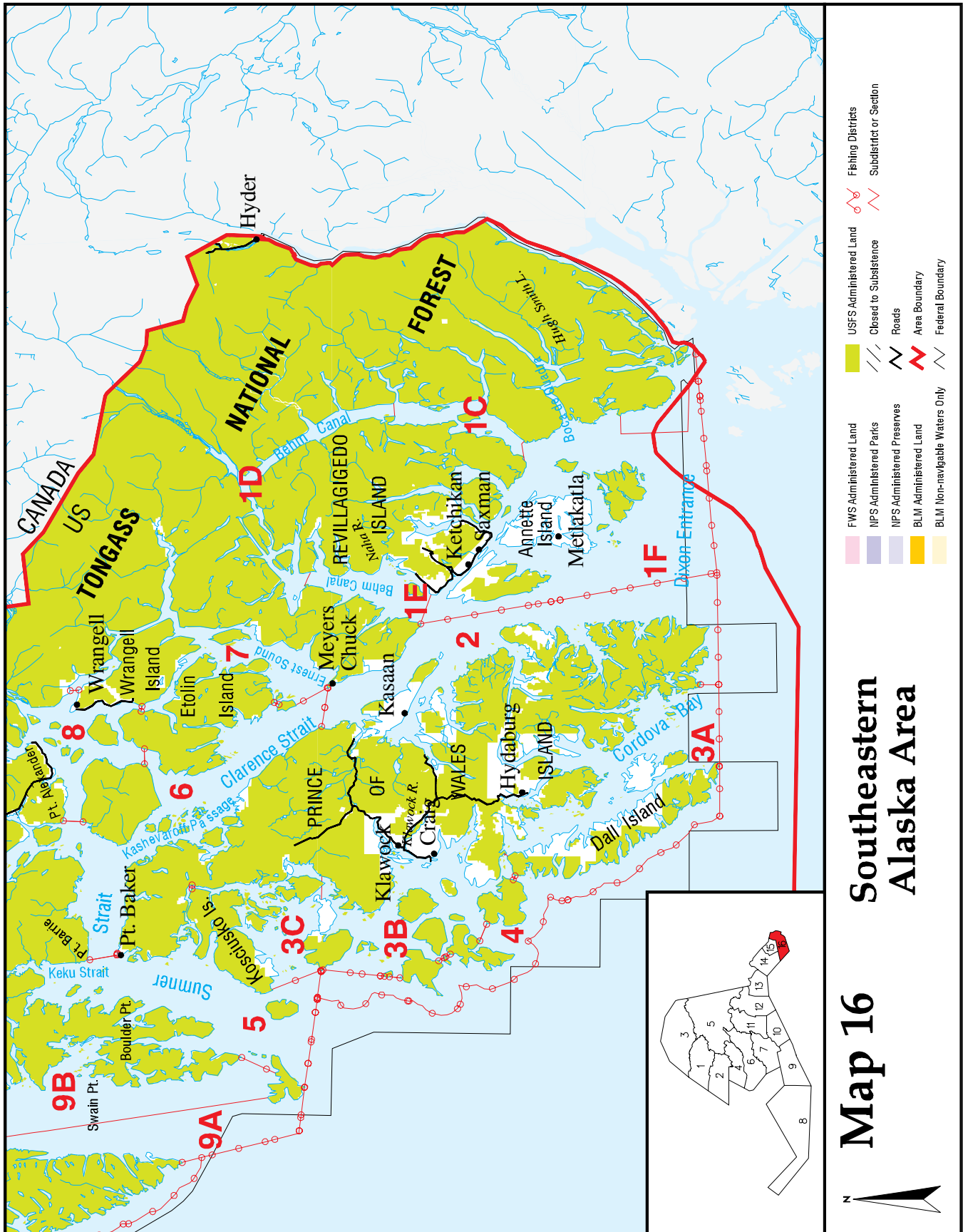






Map 15
Southeastern
Alaska Area

- | | | |
|-------------------------------|------------------------|------------------------|
| FWS Administered Land | USFS Administered Land | Fishing Districts |
| NPS Administered Parks | Closed to Subsistence | Subdistrict or Section |
| NPS Administered Preserves | Roads | |
| BLM Administered Land | Area Boundary | |
| BLM Non-navigable Waters Only | Federal Boundary | |



**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).
2. **Authority.** The Council is renewed by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (16 U.S.C. 3115 (1988)), and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is regulated by the Federal Advisory Committee Act (FACA), as amended, 5 U.S.C. Appendix 2.
3. **Objectives and Scope of Activities.** The objective of the Council is to provide a forum for the residents of the Region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the Region.
4. **Description of Duties.** The Council has authority to perform the following duties:
 - a. Recommend the initiation of, review, and evaluate 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 decisionmaking process affecting the taking of fish and wildlife on the public lands within the Region for subsistence uses.
 - d. Prepare an annual report to the Secretary containing the following:
 - (1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the Region.
 - (2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the Region.

- (3) A recommended strategy for the management of fish and wildlife populations within the Region to accommodate such subsistence uses and needs.
 - (4) Recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.
 - e. Appoint one member to the Wrangell-St. Elias National Park Subsistence Resource Commission in accordance with Section 808 of the Alaska National Interest Lands Conservation Act (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.
5. **Agency or Official to Whom the Council Reports.** The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.
 6. **Support.** The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.
 7. **Estimated Annual Operating Costs and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$175,000, including all direct and indirect expenses and 1.15 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:
 - Approve or call all of the advisory committee's and subcommittees' meetings,
 - Prepare and approve all meeting agendas,
 - Attend all committee and subcommittee meetings,
 - Adjourn any meeting when the DFO determines adjournment to be in the public interest, and
 - 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 specific party matter in which the member has a direct financial interest in a lease, license, permit, contract, claim, agreement, or related litigation with the Department

14. **Subcommittees.** Subject to the DFO's approval, subcommittees may be formed for the purpose of compiling information and conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. The Council Chair, with the approval of the DFO, will appoint subcommittee members. 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

NOV 20 2015

Date Signed

DEC 03 2015

Date Filed

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