

WP22-08 Executive Summary

General Description	Wildlife Proposal WP22-08 requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council</i>
Proposed Regulation	<p>Unit 4 - Deer</p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31</i></p> <p><i>Non-Federally qualified users are limited to 2 male deer in the Northeast Chichagof Controlled Use Area</i></p>
OSM Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	Support
Interagency Staff Committee Comments	<p>The ISC acknowledges the discussion by the Council members that this proposal is not a complete closure but a reduction of non-Federally qualified use of resources in this area. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Hoonah about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They supported this proposal as a way that provided the least inconvenience to non-Federally qualified users while also reducing competition for the local subsistence users.</p>
ADF&G Comments	Oppose
Written Public Comments	44 Oppose, 2 Neutral

WP22-08 Executive Summary

Notes

This is an executive summary from the Proposal WP22-07 analysis, which was included in the Federal Subsistence Board April 2022 meeting book. The following analysis has been updated and revised based on the Board's deferral of this proposal at their April 2022 meeting.

The Southeast Council's recommendation has been maintained at the end of this analysis for reference. ADF&G's full comments and all of the written public comments can be found in the April 2022 version of the analysis on the Office of Subsistence Management website at: <https://www.doi.gov/subsistence/wildlife>.

**STAFF ANALYSIS
WP22-08**

ISSUES

Wildlife Proposal WP22-08, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer.

DISCUSSION

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

Existing Federal Regulation

Unit 4 - Deer

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

Proposed Federal Regulation

Unit 4 - Deer

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

***Non-Federally qualified users are limited to 2 male deer in the
Northeast Chichagof Controlled Use Area***

Existing State Regulation

Unit 4 - Deer

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

<i>Residents and Nonresidents - 3 deer total</i>	<i>Bucks</i>	<i>HT</i>	<i>Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>HT</i>	<i>Sept. 15 - Dec. 31</i>

Unit 4 - Deer

Remainder

*Residents and Non-residents
- 6 deer total*

Bucks

HT Aug. 1 - Sept. 14

Any deer

HT Sept. 15 – Dec. 31

Extent of Federal Public Lands

Unit 4 is comprised of approximately 96% Federal Public Lands and consists of 95% U.S. Forest Service (USFS) managed lands and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (**Map 1**).

Customary and Traditional Use Determination

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

Regulatory History

See WP22-07 analysis.

Current Events

See WP22-07 analysis.

Biological Background

See WP22-07 analysis

Habitat

See WP22-07.

Population Information

McCoy (2017) outlines the limitations of estimating deer populations, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall. Most recently, the heavy snowfall during the winter of 2021-22 led to concerns about possible heavy mortality. However, mortality surveys in the spring of 2022 found that there was not higher than normal winter mortality, and that the body condition of live deer was similar to that in previous years (Bethune 2022).

McCoy (2019) explained that Unit 4 deer pellet-group counts in 2019 were higher than previous counts

in all three survey areas. Pavlov Harbor, within the proposal analysis area (**Map 1**), was surveyed in 2019. Results indicate a 39% increase in pellet-groups from the last survey conducted in 2010 (McCoy 2010).

Annual harvest is one indication of deer population status. The estimated average annual deer harvest in Unit 4 is 5,579 deer (**Figure 1**). Deer harvest was below average in 2007-2010, probably due to high deer mortality from several consecutive harsh winters. Unit 4 annual deer harvest has increased to pre-2007 levels, suggesting that the Unit 4 deer population has recovered from those harsh winters.

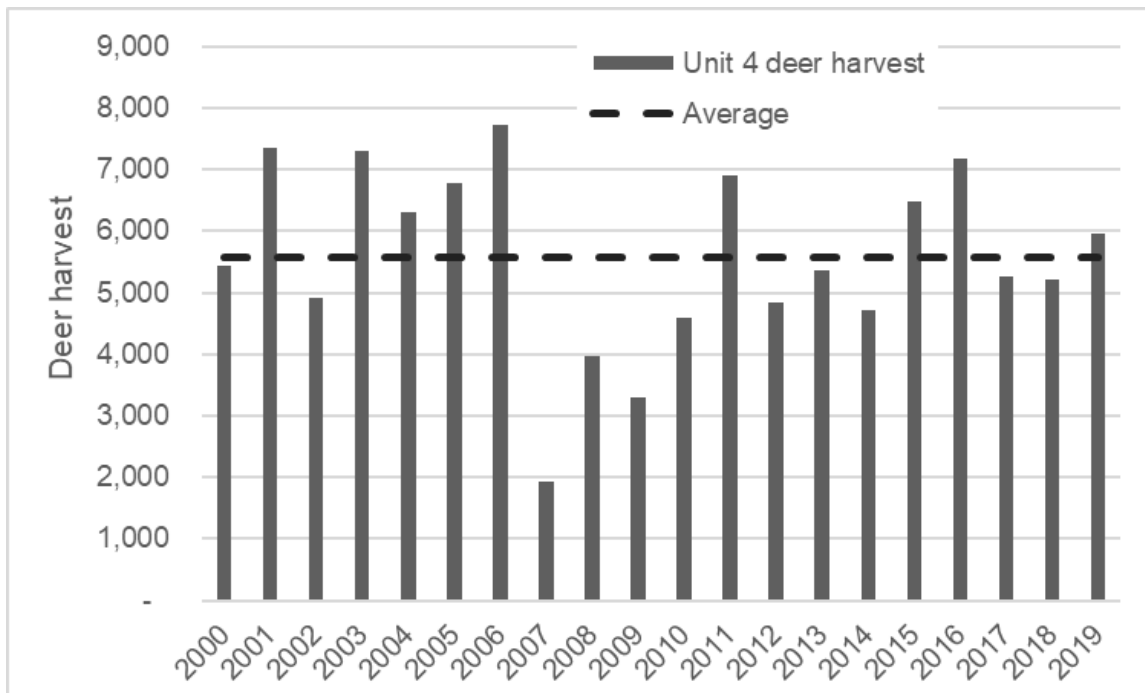


Figure 1. Unit 4 estimated annual deer harvest, 2000-2019 (ADF&G 2021).

Cultural Practices and Traditional Knowledge

Community Background

Four communities are located within the area that is the focus of the proposal, the Northeast Chichagof Controlled Use Area (NECCUA): Hoonah, Game Creek, Tenakee Springs, and Whitestone Camp. Hoonah is a primarily Tlingit community of long standing situated at the entrance to Port Frederick and about 40 miles west of Juneau. Nearby the community of Hoonah are Game Creek, founded as a religious community, and Whitestone Logging Camp, founded by loggers and their families. Game Creek and Whitestone are within three miles of and are road connected to Hoonah. Tenakee Springs is situated on Tenakee Inlet about 20 miles southeast of Hoonah. It has a year-round population and also serves part-time residents who arrive in summer from other places. Tenakee Springs can be accessed

by float plane or boat. The State ferry system provides passenger transportation only, and local transportation is primarily by bicycle or ATV (ADCCED 2022).

Also heavily reliant on the NECCUA for deer hunting, Gustavus is situated near the entrance to Glacier Bay, across Icy Strait from Hoonah, nearby but outside of the NECCUA. Gustavus can be reached by plane or boat. Gustavus is considered the gateway to Glacier Bay National Park. The population of Gustavus increases substantially in the summer months with the arrival of part-time residents (ADCCED 2022).

An Alaska State ferry is scheduled to visit Hoonah and Gustavus up to twice a week from October through December and from March through April; however the ferry is occasionally canceled for various reasons. The Ferry will not visit Hoonah or Gustavus from January through February (Juneau Empire 2022). Hoonah residents sometimes find themselves unable to secure a place on the Alaska State ferry because of the high number of people and vehicles bound for Hoonah intending to hunt for deer (SEASRAC 2009).

The population of these coastal communities fluctuates in response to opportunities for local employment through fishing, logging, and tourist industries (Sill and Koster 2017). The combined population of these communities has more than doubled since 1960 to an estimated 5,613 people in 2020 (Table 1; ADCCED 2022). The population of Hoonah has remained relatively stable over the past three decades. In the 1980s, large scale logging brought high numbers of new residents to the Hoonah area, an estimated additional population of 400 loggers and their families in camps and some have stayed, such as at Whitestone Camp. The majority of people living in Hoonah today are from Hoonah or other Southeast Alaska towns (Schroeder and Kookesh 1990, Sill and Koster 2017).

Table 1. The population of communities primarily using the NECCUA to harvest deer based on the US Census (CDP=Census Designated Place) (Source: ADCCED 2022).

Community	1960	1970	1980	1990	2000	2010	2020
Game Creek CDP	0	0	0	61	35	18	23
Gustavus city	107	64	98	258	429	442	655
Hoonah city	686	748	680	795	860	760	931
Whitestone Camp CDP	0	0	0	164	116	17	2
Total	2,203	3,762	4,218	5,227	5,704	5,506	5,613

Deer Harvest Estimates

Four communities have worked with researchers to document their harvest and uses of deer in the NECCUA. It has been shown that these four communities take the majority of their deer harvest in the NECCUA, are highly reliant on deer meat, and most households in each community use deer (ADF&G 2022, Table 2).

Table 2. The estimated harvest and use of deer by residents of Game Creek, Gustavus, Hoonah, and Whitestone based on household surveys (Source: ADF&G 2022)

Community	Study year	Number of households interviewed	Percentage of households using deer	Estimated deer harvest	Lower harvest estimate	Upper harvest estimate	Per person harvest in pounds edible weight
Game Creek	1996	12	100%	32	26	48	40
Gustavus	1987	35	70%	122	91	153	64
Hoonah	1985	71	86%	584	425	743	52
	1987	62	94%	786	572	999	90
	1996	61	74%	829	565	1,093	74
	2012	122	77%	470	366	573	51
	2016	65	94%	560	384	736	33
Whitestone	1996	24	83%	101	67	134	57

Deer Harvest Strategies

The construction of logging roads changed how Hoonah residents accessed some subsistence resources as well as how non-local people hunted and used the land. The most recent period of large-scale, high-volume, old-growth forest harvesting in the NECCUA began in 1980 occurring on both U.S. Forest Service lands and Native corporation lands. Hundreds of miles of logging roads to facilitate timber harvest were built within Hoonah’s core subsistence use area. The NECCUA encompasses this road system. Active logging has greatly decreased in recent years, but the effects of past timber harvest and road building continue to be felt by Hoonah residents today (Schroeder and Kookesh 1990, Sill and Koster 2017).

Before roads were constructed, Hoonah residents accessed hunting areas almost exclusively by foot or by skiff or boat, and hunting by non-locals was limited. After 1980, for a while the newly constructed roads became the main means of access to hunt deer. The Hoonah road system quickly gained the reputation of being a relatively inexpensive, productive, and easy place to hunt. Cars, trucks, three-wheelers, and other recreational vehicles reach the Hoonah road system via the Alaska State ferry. Before long, competition from non-local hunters became an important factor using these roads. The extensive road system also allows hunters to access some beaches by road vehicle, making a skiff unnecessary (Schroeder and Kookesh 1990; SEASRAC 2010, 2021a, 2021b).

Contemporary hunters employ a variety of access methods such as personal boats, including commercial fishing vessels, and road vehicles. The Alaska State ferry 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. Deer harvesting

also occurs while people are engaged in other activities, such as fishing (Doerr and Sigman 1986, Sill and Koster 2012).

A local perspective is that past timber over-harvest is limiting good deer habitat so when it snows, deer are left with no place to go, precipitating deer die-off. While clear-cut areas at first provide browse for deer, making Hoonah popular with non-local hunters, dense new growth is difficult for deer to pass through and doesn't supply as much browse for deer. This is negatively affecting deer populations in some areas. A buffer between old growth and the next cutting is needed to provide winter protection for wildlife (SEASRAC 2010, 2021a).

Weather affects deer populations and hunting strategies. Deer move to the beaches and forest fringe next to beaches seeking food when heavy snowfall is covering forested and higher elevation deer habitat. Hoonah residents in 2012 observed less consistency in the weather, "Whereas 20 years ago winters used to reliably have snowfall, now there are years of high snowfall followed by years where it mainly rains. There is more rain during winters with less consistent snowfall" (Sill and Koster 2017:198). This was also noted in 2021, "We'll get a dump of snow and a bunch of rain for six weeks and deer disappear until the snow comes back. In the future we're going to have more of this" (SEASRAC 2021a:339).

The rising cost of fuel for vehicles that take hunters to deer hunting areas has affected local Hoonah hunting strategies. In 2012, Sill and Koster (2017) observed, "As the cost of fuel has risen since the mid-1990s, hunters and fishers may elect to search closer to town in order to conserve fuel" (Sill and Koster 2017:193). Sill and Koster (2017:198) report that a resident told them, "With current economic conditions and high fuel prices, it is very important to be efficient when going out to harvest. It is too expensive to not bring back a harvest" (Sill and Koster 2017:198). Some Hoonah residents cannot afford to hunt someplace else, for example, "They can't afford to go anywhere because it's just too expensive. . . . You're spending everything that you have to try to get anywhere, and it just doesn't make sense" (SEASRAC 2021a:389). Poor opportunities in the cash economy has led some Hoonah residents to reiterate the necessity of the harvest of wild resources to offset the high cost of living in Hoonah (Sill and Koster 2017; SEASRAC 2010, 2021b).

Localized Depletion of Deer and Displacement of Local Hunters

Reports of localized depletion of deer have been common. As early as 1986, Schroeder and Kookesh (1990) observed Hoonah hunters having difficulty harvesting deer in some parts of Hoonah's core harvest area. Hoonah residents who were successfully harvesting deer had abandoned areas near roads as competition from other hunters increased (Schroeder and Kookesh 1990). Similar concerns were documented in 2009, 2010, 2012, and 2021 (Sills and Koster 2017; SEASRAC 2009, 2010, 2021a, 2021b). For example, observations made by Sills and Koster (2017) in 2012 include, "The issue of how many deer are taken by non-local hunters was a concern due to the effect it has on local hunters, as was simply the number of deer hunters out hunting, making local areas and roads too crowded to hunt" (Sills and Koster 2017:196), and more recently at Southeast Alaska Council meetings in 2021, "Last season was particularly hard, competition-wise. There were days I'd go out and I'd have to hop over

three bays” before seeing any sign of deer, suggesting the deer population in these bays had been hunted out (SEASRAC 2021b:456).

In 2009, after several years of heavy snowfall covering deer browse in the area and negatively impacting the deer population, some Hoonah residents reported self-regulating themselves by not hunting for deer on Chichagof Island and instead relying on other food sources. Some local hunters with the resources to hunt further from Hoonah were seeking deer as far away as on Lemishure and Pleasant Islands instead, requiring hunters to cross Icy Strait (SEASRAC 2009).

Traditional Rules

A local Hoonah perspective is that non-local hunters do not always know what “subsistence” is about, for example, “They just take part of the deer and not the whole deer. Whenever we strip a deer, we always . . . use as much as possible” (SEASRAC 2021a:201), and many non-local hunters are not entirely focused on deer hunting and instead are more focused on recreating (SEASRAC 2021a).

The role of sharing to distribute subsistence-caught food within the community, and its contribution to people’s survival over centuries, was described by Hoonah residents (SEASRAC 2009, 2010, 2021a; Sill and Koster 2017).

Conflict between Hunter Success Rates Reported by ADF&G versus Local Observations

A Hoonah perspective is that the deer harvest reporting system is used primarily by successful hunters who don’t always include information about the number of trips they took, especially in 2007 and 2008 when the deer population took a steep decline. Harvest statistics of success rates are not the same as people’s observations. “In many cases hunter success rate, especially average hunter success rate, is lower than indicated in the analysis, and I think that tends to be attributed to just the competition factor” (SEASRAC 2021b: 456).

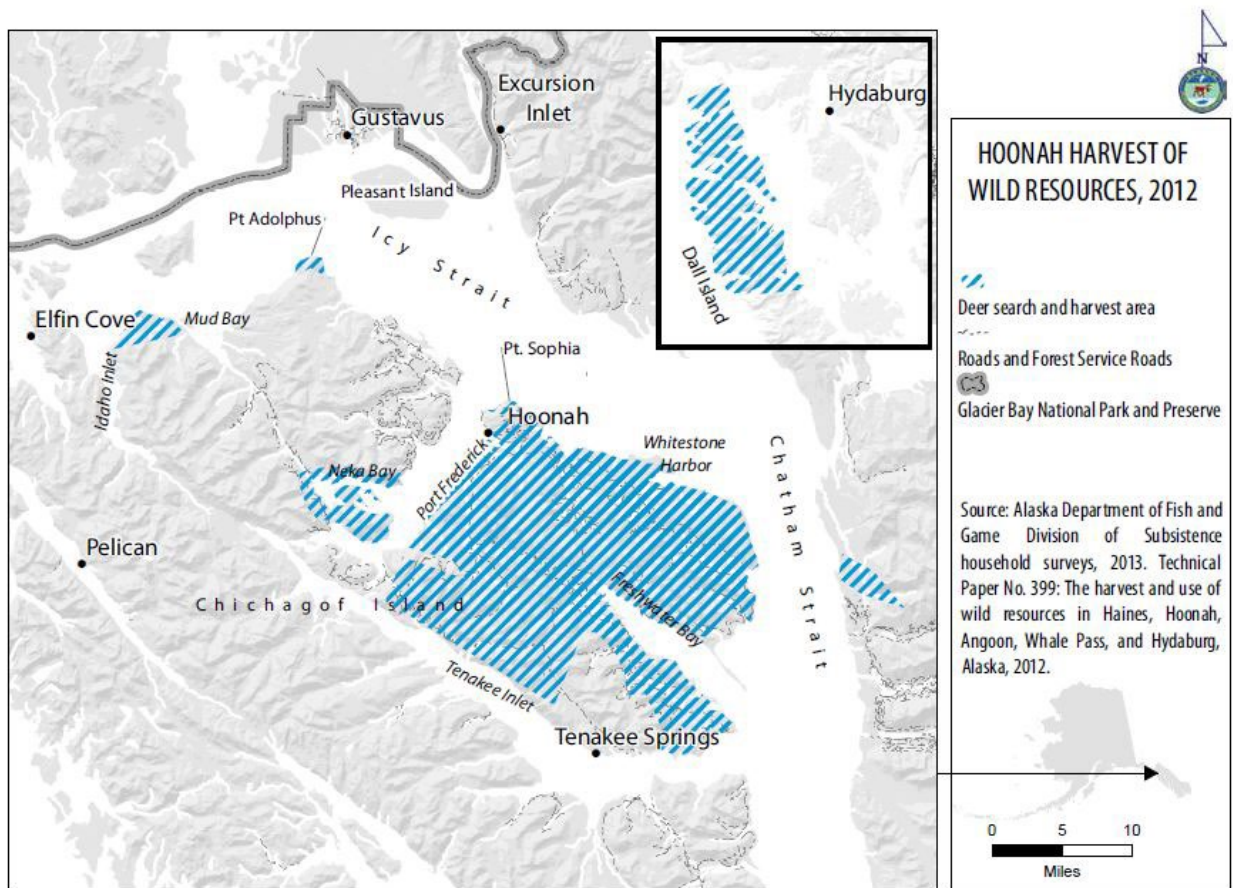


Figure 2. Reported deer hunting locations used by residents of Hoonah in 2012. From Sill and Koster 2017.

Harvest History

Through 2010, deer harvest data provided by the Alaska Department of Fish and Game (ADF&G) are based on a sample of hunters. In general, 35% of hunters from each community are surveyed each year and, while response rates vary by community, the overall response rate across communities is approximately 60%. Harvest numbers are extrapolated using expansion factors calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. As confidence intervals are not available for these data, exact numbers should be considered estimates and used with caution. Trends, however, especially at larger scales, should be indicative of general population change. Since 2011, harvest data have been gathered through mandatory reporting. ADF&G expands the harvest estimate based on the number of reports returned to account for unreturned harvest reports. Additionally, if the response rate is low within a community, ADF&G staff call hunters to ask about their hunting efforts and harvests in an effort to achieve a 60% reporting rate (Bethune 2020).

Deer harvest in Unit 4 in 2007/08 ($1,858 \pm 236$) was down significantly from 2006/07 ($7,746 \pm 594$) and was the lowest harvest in Unit 4 in over a decade due to significant mortality from preceding severe winters (McCoy et al. 2007). Prior to 2007/08, Unit 4 deer harvest was mostly stable, fluctuating around 7,000 deer. Harvest data indicates that the annual Unit 4 deer harvests increased beginning around 2008-2009 and was 5,969 in 2019 (**Figure 1**).

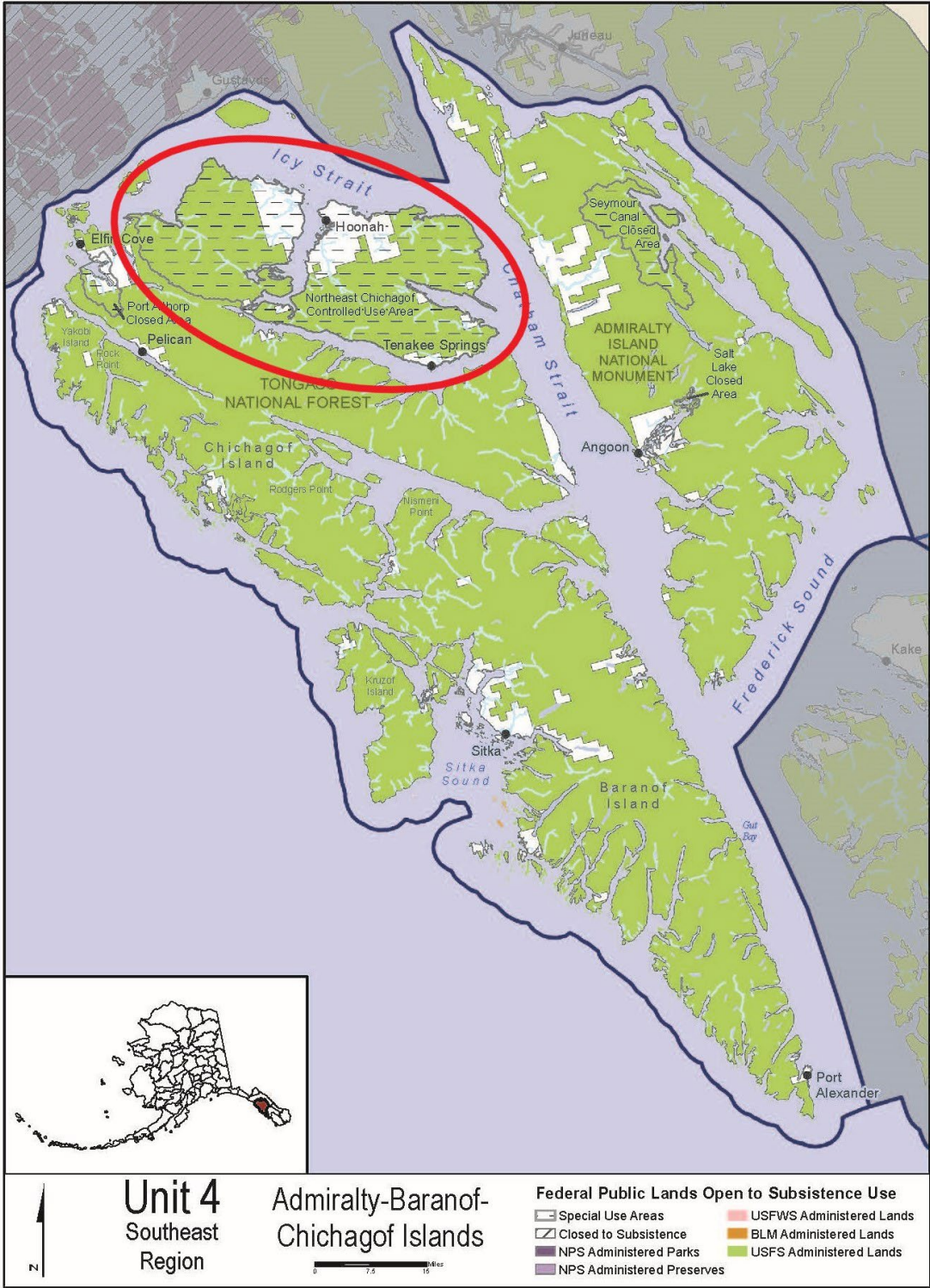
The proposal analysis area for WP22-08 relative to Unit 4 is shown in **Map 1**. The harvest data presented is specific to wildlife analysis areas (WAA) encompassing the area of northeast Chichagof Island north of Tenakee and Idaho Inlets, collectively called NECCUA (**Map 2**).

The vast majority of deer hunting effort and harvest of deer by Hoonah residents occurs within the eight WAAs comprising the NECCUA. Almost half of hunting and harvest by Hoonah residents in Unit 4 is from the Hoonah area and East Side Port Frederick, the WAAs closest to Hoonah. Only 3% of the harvest and effort by Hoonah residents occurs in areas of Unit 4 outside of the NECCUA (**Table 3**, ADF&G 2022b).

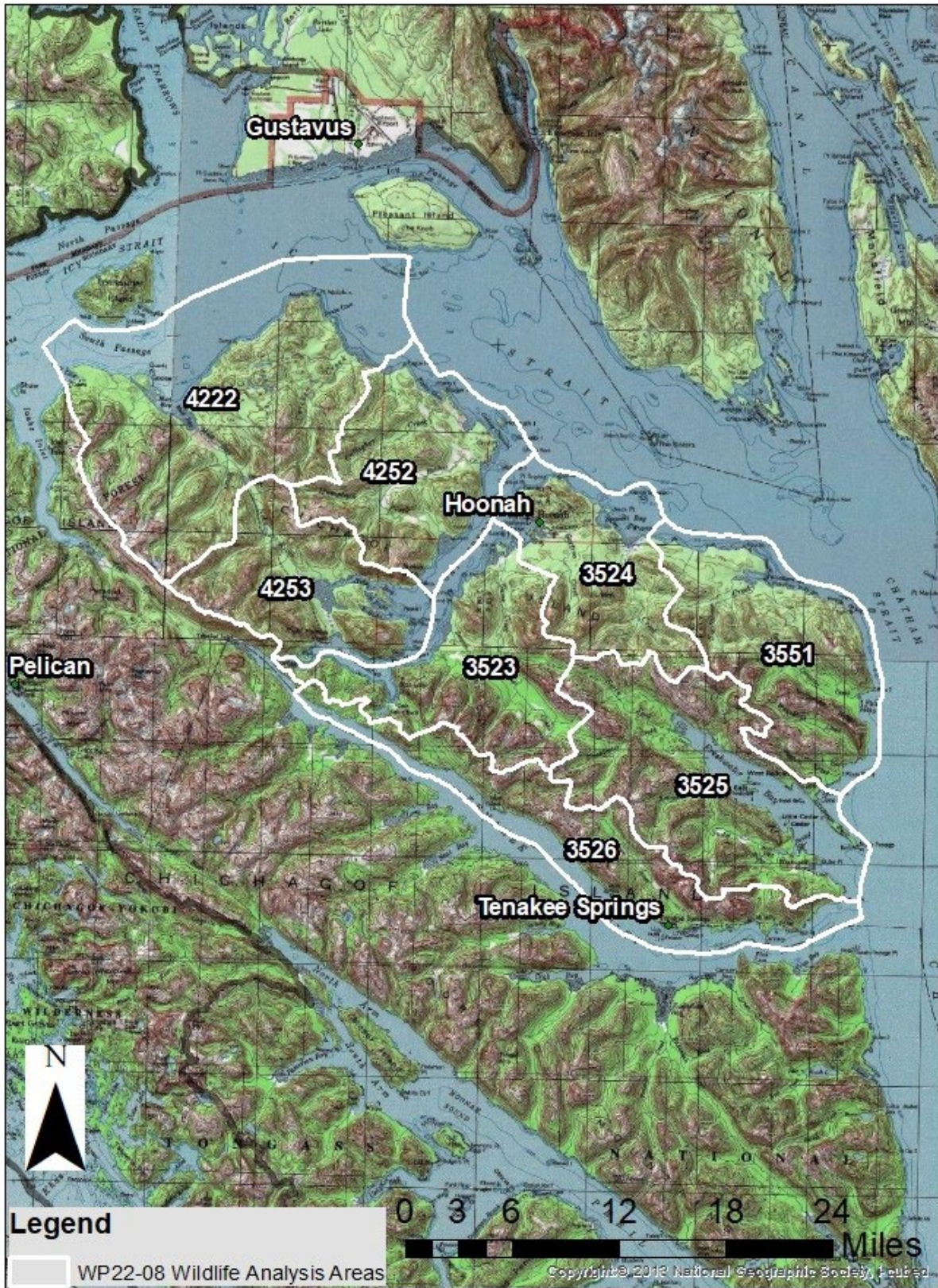
Harvest and effort by Federally qualified subsistence users and non-Federally qualified users in the relevant WAAs is presented in **Figures 3** and **4** below. Federally qualified harvest is higher in most years compared to other users (**Figure 3**) while effort, expressed in hunter days, is generally lower (**Figure 4**). Non-Federally qualified users have a lower success rate which results in higher hunting effort compared to Federally qualified subsistence users. Between 2007 and 2021, Federal subsistence harvest increased to a high in 2016 before dropping slightly (**Figure 3**). Over the same period, effort in days hunted appears to be decreasing from a high in 2015, with Federally qualified subsistence user hunt days dropping the most. Eighty-two percent of non-Federally qualified users harvest 2 deer or less annually from Unit 4 (**Figure 5**). Female deer harvest by non-Federally qualified users has averaged 17% since 2000, with a peak of 33% in 2017 (**Figure 6**).

The chronology of deer hunting effort in all of Unit 4 is probably similar to effort in the proposal analysis area, varying by user group. November is the most popular hunting month for both groups, particularly for non-Federally qualified users (**Figure 7**).

Hoonah residents experience high success rates, which is measured as reporting harvesting at least one deer. Since 2009, success rates have generally been above 70%, reaching up to 90% in some years (**Figure 8**).



Map 1. Unit 4 management map with proposal analysis area (NECCUA) encircled in red.



Map 2. Wildlife analysis areas (NECCUA) used for harvest and effort data analysis.

Table 3. Distribution of deer hunting harvest and effort by Hoonah residents in Unit 4, 2000-2021. (ADF&G 2022b)

Wildlife Analysis Area				
	Total harvest	Days hunted	Percent harvest	Percent days hunted
Within NECCUA				
3523 EAST SIDE PORT FREDERICK, GAME CREEK	1448.8	3951.6	21%	22%
3524 HOONAH AREA	1261.5	4096	18%	23%
3525 FRESHWATER BAY DRAINAGES	986.4	2576.6	14%	14%
3526 NORTH SHORE TENAKEE INLET	13.1	45.1	0%	0%
3551 WHITESTONE HARBOR, FALSE BAY DRAINAGES	1098.1	2933.8	16%	16%
4222 PT. ADOLPHUS, MUD BAY AREA	236.6	337.6	3%	2%
4252 HUMPBACK, GALLAGHER CREEKS	1045.5	2314.6	15%	13%
4253 NEKA BAY DRAINAGES	755.4	1121	11%	6%
Total within NECCUA	6845.4	17376.3	97%	97%
Outside NECCUA				
3001 NAKWASINA, NEVA STRAIT AREA	2.3	4.5	0%	0%
3002 SITKA ROAD SYSTEM	10.3	12	0%	0%
3104 NORTHERN KRUFZOF IS.	18	13.4	0%	0%
3207 CRAWFISH INLETS, NECKAR BAY	3.1	3.1	0%	0%
3308 KOOK LAKE, SITKOH BAY, FALSE IS.	22.5	252	0%	1%
3314 FISH BAY DRAINAGES	0	16.8	0%	0%
3417 WEST COAST CHICHAGOF	11.7	8.7	0%	0%
3418 YAKOBI IS.	4.6	6.9	0%	0%
3420 IDAHO INLET DRAINAGES	32.1	75.1	0%	0%
3421 PORT ALTHORP, LOWER LISIANSKI, INIAN IS.	7.5	16.9	0%	0%
3627 CORNER BAY, TRAP BAY	2.9	5.2	0%	0%
3629 SOUTHERN SHORE TENAKEE INLET	5.8	2.9	0%	0%
3732 WARM SPRINGS COAST	3.1	3.1	0%	0%
3836 HAWK INLET, YOUNG BAY DRAINAGES	3.1	3.1	0%	0%
3939 PYBUS BAY DRAINAGES	8.1	18.9	0%	0%
4041 WHITEWATER BAY, WILSON COVE	3.2	6.4	0%	0%
4043 CENTRAL ADMIRALTY LAKES	6.4	6.4	0%	0%
4044 SHEE-ATIKA DRAINAGES	14.6	14.6	0%	0%
4055 HOOD BAY, CHAIK BAY DRAINAGES	3.2	6.4	0%	0%
4150 GRAND IS., OLIVER INLET, STINK CREEK	0	9.9	0%	0%
4256 LEMESURIER, PLEASANT ISLANDS	18.2	16.4	0%	0%
Total outside NECCUA	180.7	502.7	3%	3%
Total Unit 4	7026.1	17879		

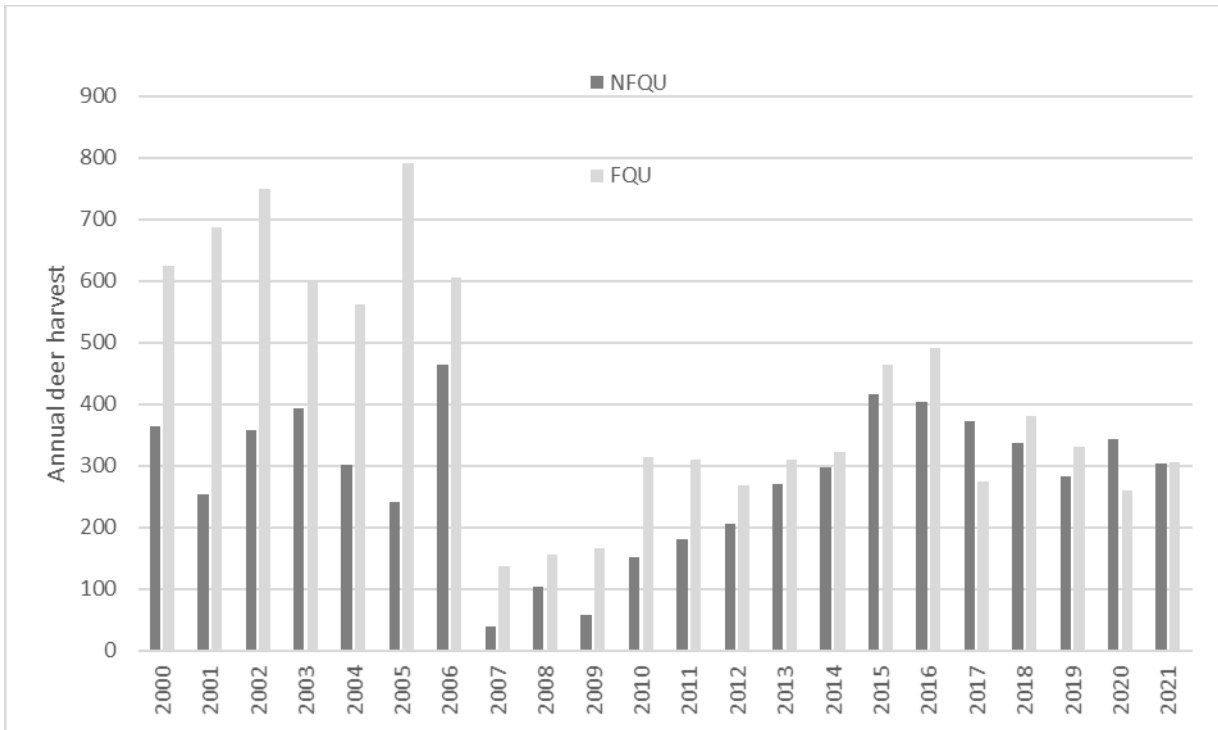


Figure 3. Annual deer harvest by Federally qualified (FQU) and non-Federally qualified (NFQU) users in the proposal analysis area, 2000-2021 (ADF&G 2022b).

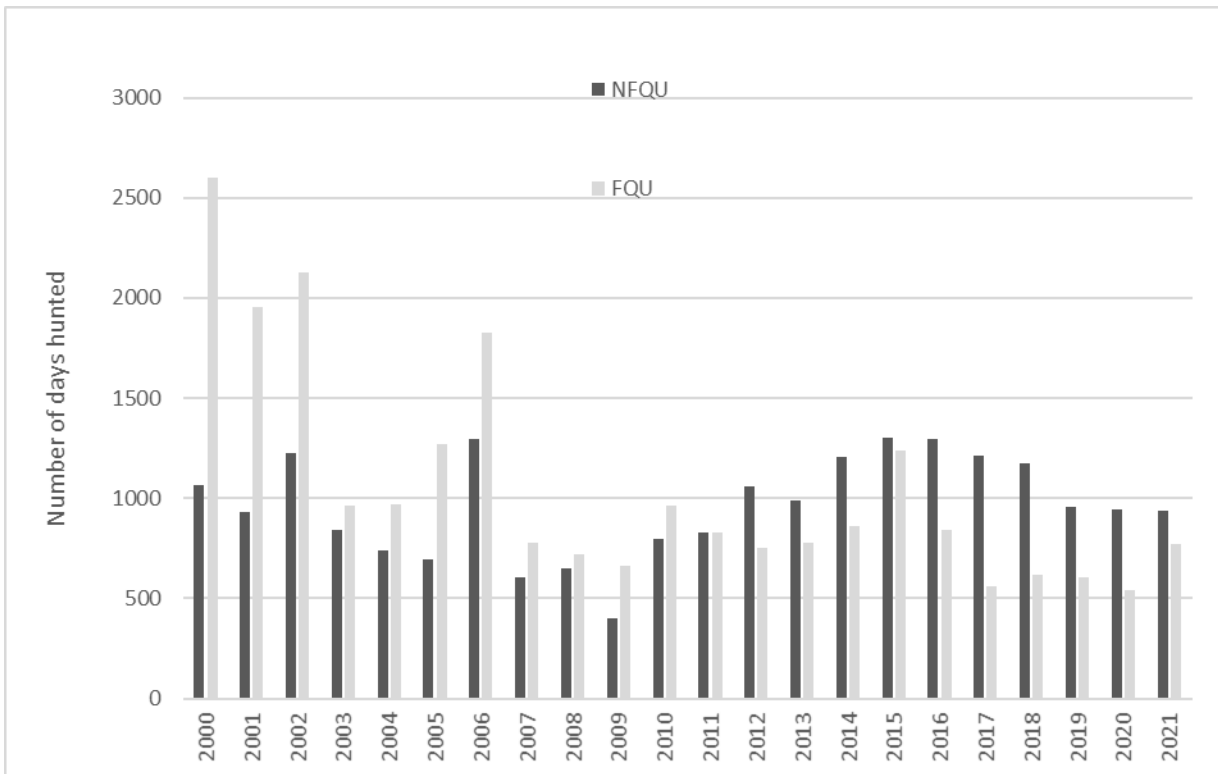


Figure 4. Annual effort, in hunter days, by Federally qualified (FQU) and non-Federally qualified (NFQU) users in the proposal analysis area, 2000-2021 (ADF&G 2022b).

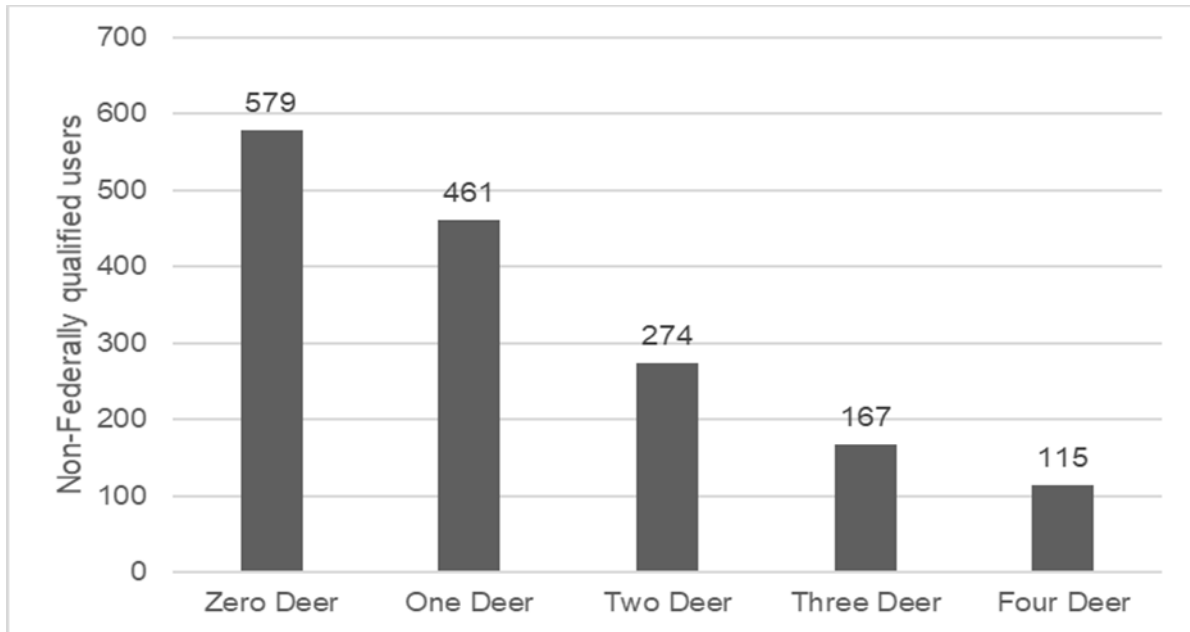


Figure 5. Average number of non-Federally qualified users harvesting 0-4 deer annually in Unit 4, 2000-2019 (ADF&G 2021).

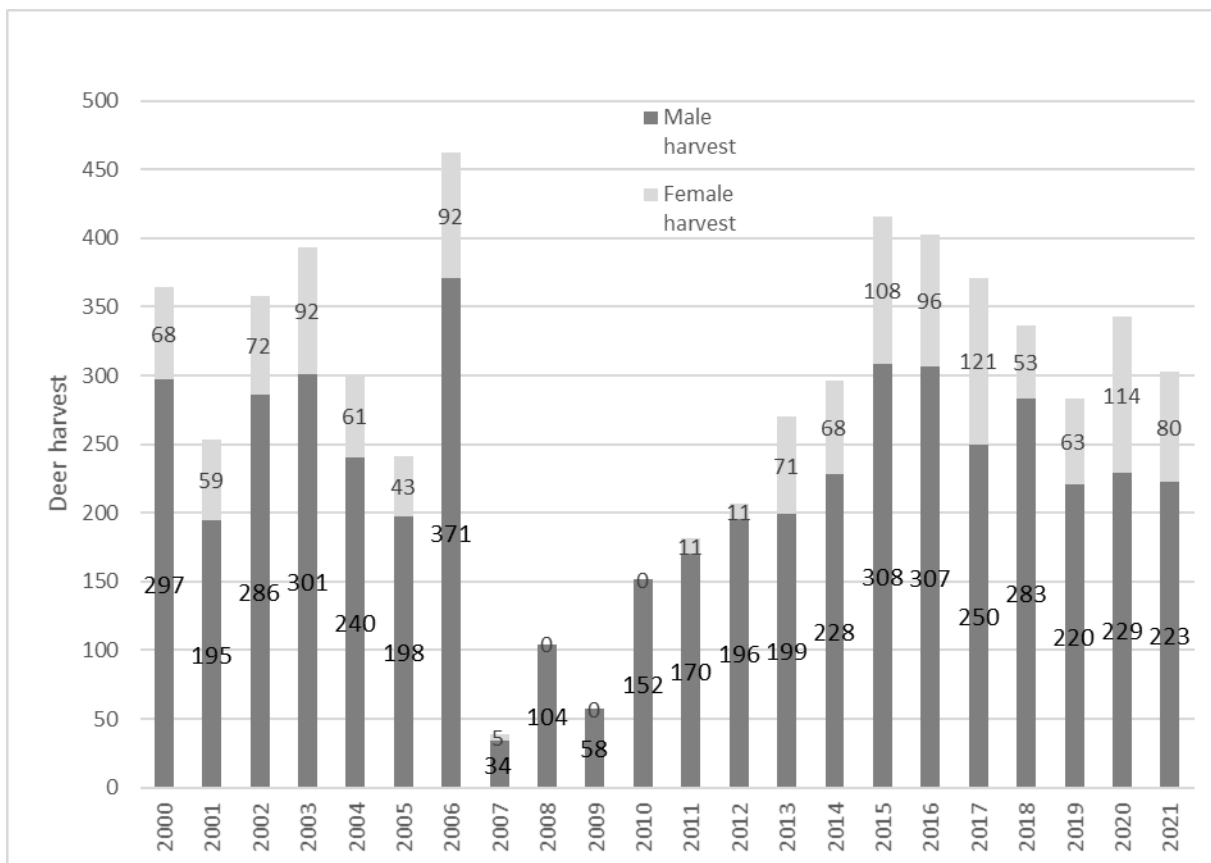


Figure 6. Number of male and female deer harvested by non-federally qualified users in NECCUA, 2000-2021. Female deer harvest was restricted 2007-2021. (ADF&G 2022b).

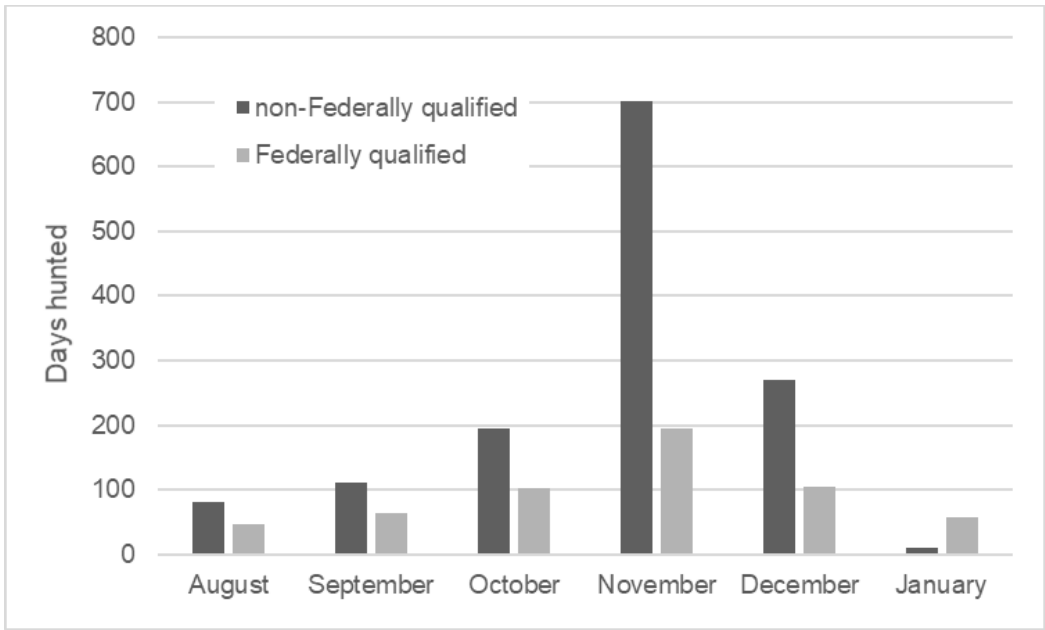


Figure 7. Average number of days hunted annually by Federally qualified subsistence users and non-Federally qualified users in Unit 4, 2000-2019 (ADF&G 2021).

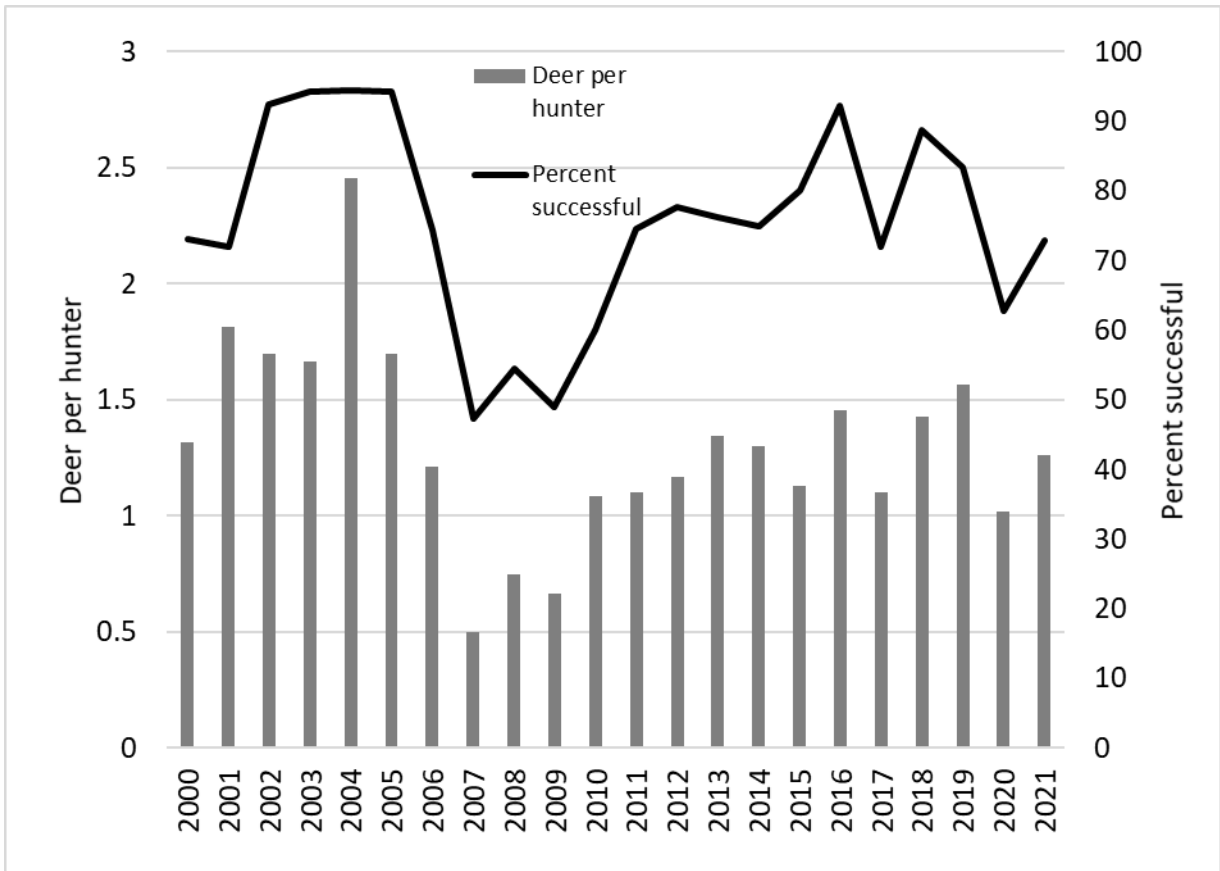


Figure 8. Hunter success rate and deer harvested per hunter for Hoonah residents hunting in the proposal area, 2000-2021 (ADF&G 2022b).

Other Alternatives Considered

Working Group: One alternative considered was to establish a Unit 4 deer working group. This suggestion was mentioned many times by Southeast Council members and public testers during the fall 2021 Southeast Council meeting. Developing a “Unit 4 deer management strategy,” which was also suggested multiple times during the fall 2021 Southeast Council meeting, could be one goal of the working group. Several Council members recognized that subsistence uses of deer in Unit 4 was an issue that they wanted to elevate to the Board’s attention, but commented that these specific regulatory proposals (WP22-07, -08, and -10) did not seem to be the best solution.

This alternative would allow consideration of this issue more holistically and on a longer time-scale than the regulatory proposals. It would also enable all alternatives to be considered and could help bring user groups together for discussion, which the Board requested in its deferral. While this alternative is outside the scope of this proposal, it could be considered further by the Southeast Council. If the Council would like to establish a working group, it could do so at its meeting by selecting Council members to serve on the working group. Federal and State agency staff could also be part of the working group, while members of the public and other organizations could participate in working group meetings if they are announced through press releases.

Effects of the Proposal

This proposal would restrict non-Federally qualified users on Federal public lands within the NECCUA by limiting harvest to two male deer. Restricting non-Federally qualified users could decrease total deer harvest and may slightly reduce competition with Federally qualified subsistence users in the area since most non-Federally qualified users target bucks, already. Lower harvests by and reduced competition with non-Federally qualified users may result in more deer harvested by Federally qualified subsistence users. Non-Federally qualified users may concentrate more efforts on the State managed lands within the NECCUA, including lands immediately surrounding Hoonah. However, considering that very few non-Federally qualified users harvest more than two deer in Unit 4, and most of the deer harvested within the analysis area are males, this restriction would probably have little impact on the hunting effort, location, or harvest of non-Federally qualified users within the analysis area.

Southeast Council members expressed concern over the displacement of non-Federally qualified users to other areas if this proposal was adopted, which one member called “squeezing the balloon”. If Proposal WP22-07 was adopted, Council members expressed concern that some of those displaced hunters may shift their efforts to the NECCUA (SEARAC 2021b). They were especially concerned about this displacement if all three proposals (WP22-07, -08, and -10) were adopted, stating hunting pressure will just shift and become concentrated in other areas, creating similar problems there instead (SEARAC 2021b). This may be the largest cumulative impact if the Board adopted all three Unit 4 deer proposals. Another concern brought up at the Southeast Council meeting over all three proposals was enforcement. A public tester stated that he has never seen any Federal officers out during hunting season, and wondered about the effectiveness of these restrictions/closures if no one was

enforcing them (SEARC 2021b). Determining whether or not non-Federally qualified users and deer are below the unmarked mean high tide line on state-owned lands is another enforcement concern.

During the fall 2021 Southeast Council meeting, Council members also discussed the impact of proxy hunting on the effectiveness of harvest limit reductions. A Council member stated, “So anybody going into this area who wanted to shoot a bunch of deer just has to go through the relatively minor step of getting a proxy permit for one or two people and they could harvest quite a few deer. So that limit the effectiveness of harvest limit [reductions] on cutting down deer hunting.” (SEARAC 2021b).

The user conflicts in the NECCUA are affected by the road system, which one Council member summarized as, “there is a documented concern about, and it’s held up by local traditional knowledge that there is competition on the Hoonah road system from non-Federally qualified users.” A Council member from Hoonah stated that the extensive road network allows people “to get to coastlines that you don’t have to take a skiff to.” He continued, “Whitestone Harbor, that experienced really, really high pressure from skiffs and from, what I presume is . . . non-Federally qualified users . . . the hunters from Hoonah who would drive out to Whitestone Harbor and basically not be able to hunt there because of . . . having three boats parked up at Whitestone Harbor hunting the entire thing, like every weekend, during the week too” (SEARAC 2021b). Additionally, a member of the public testified that, “There are a lot of cabin owners in Freshwater Bay who don’t really compete with the road system hunters from Hoonah, who this would adversely effect. . . .I think this is unnecessary for those folks.”

Local knowledge attests that only one or two boats in an area can negatively affect the success of subsistence hunts because access in some inlets is very small. Therefore, even though ADF&G harvest reports indicate no increase in non-Federally qualified subsistence users hunting in these areas, just a couple can seriously impact subsistence hunts (SEARC 2021b). As one Council member put it, “There’s plenty of water but there’s not enough elbow room at the bar.”

Comments received during the Fall 2021 Southeast Council meetings were mixed on whether the concerns over subsistence uses of deer in Unit 4 were an issue of conservation concern stemming from localized depletion of deer, which ADF&G unit-wide data was too coarse to detect or an issue of continuation of subsistence uses stemming from competition and crowding from non-local hunters who may displace local, subsistence hunters from preferred and traditional hunting areas. A Council member from Hoonah stated, “Last season was particularly hard, competition-wise” due to the early snowfall, which “put a lot of pressure on the deer.” Later he mentioned, “. . . what I’ve heard from others, is that the deer number are just a little bit down right now . . . [but] I don’t think I could say there’s a conservation concern.”

However, feedback received during the open meeting in August 2022 indicated people did not experience any difficult harvesting deer in Unit 4, which is corroborated by ADF&G survey data indicating Unit 4 has the highest deer population in Alaska. Additionally, during the open meeting, people commented that any perceived deer population decline likely resulted from mild winters, which precluded deer from being concentrated and easily observable on beaches.

The best solution, regulatory or otherwise, depends on the cause. If declining deer populations is the

cause, then limiting non-Federally qualified users to bucks-only could help limit harvest and promote deer population recovery. However, if competition and crowding is the cause, then the bucks-only restriction may exacerbate the problem and increase user conflicts as non-Federally qualified users who may have harvested a doe and left, now have to wait until then encounter a buck, thereby extending their hunting time. Additionally, the deer population may be at winter carrying capacity in some areas of Unit 4, suggesting harvest of does may benefit the deer population and limiting non-Federally qualified users to bucks-only could have detrimental effects on the deer population.

OSM CONCLUSION

Oppose Proposal WP22-08.

Justification

§815(3) of ANILCA provides that the Board may restrict non-subsistence uses on Federal public lands only if *necessary* “for the conservation of healthy populations of fish and wildlife” or “to continue subsistence uses of such populations.” The closure of Federal public lands within the proposal area does not meet this criteria. The closure is not necessary for the conservation of healthy deer populations. The Unit 4 deer population is healthy, abundant, and the highest in the state. Additionally, restricting non-Federally qualified users to two male deer annually within the proposal area could negatively impact the deer population, which may be approaching carrying capacity.

The restriction is also not necessary for the continuation of subsistence uses based on the available evidence. Hoonah deer hunters experience high success rates, and the deer harvested per hunter has rebounded to pre-2007 levels. Further, only 18% of non-Federally qualified users harvest more than 2 deer in Unit 4 on average, and 83% of their average harvest within the proposal area has been bucks; therefore, the proposed restriction is not likely to significantly affect effort by non-Federally qualified users or the hunting experience of Federally qualified subsistence users. Rather, user conflicts may slightly increase if non-Federally qualified users must pass on does and therefore, spend longer hours in the field until they encounter one to two bucks.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Support WP22-08. The restriction is necessary for the continuation of subsistence uses based on public and written testimony from residents and is supported by local and traditional knowledge. This proposal benefits Federally qualified subsistence users because it 1) reduces the harvest limit and restricts the harvest to bucks only for non-Federally qualified users, which reserves does for Federally qualified subsistence users, 2) provides additional harvest opportunities, and 3) may help limit hunting competition around Hoonah during the hunting season. Limiting non-Federally qualified users to two bucks would not be an inconvenience as these users rarely take more than 2 deer.

INTERAGENCY STAFF COMMITTEE COMMENTS

The ISC acknowledges the discussion by the Council members that this proposal is not a complete closure but a reduction of non-Federally qualified use of resources in this area. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Hoonah about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They supported this proposal as a way that provided the least inconvenience to non-Federally qualified users while also reducing competition for the local subsistence users.