



# Federal Subsistence Board Public Meeting

## Meeting Materials - Volume II

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*April 2-5, 2024  
Anchorage, Alaska*





# **Volume II**

## **Non-Consensus Agenda Wildlife Proposals, Closure Reviews, and other documents**

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#### *Non-Consensus Agenda Wildlife Proposals and Closure Reviews*

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**1354** RFR22-01 - Request for Reconsideration

**1364** SCRAC Unit 6 Deer - Request to Change DAL

**1366** Cordova RD Unit 6 Deer Moose DAL

**1370** Togiak NWR Caribou - Request to Change DAL

**1374** Togiak NWR Unit 17A 17C Nushagak Caribou DAL



**FEDERAL SUBSISTENCE BOARD  
PUBLIC MEETING AGENDA  
April 2 – 5, 2024**

April 2, 2024: 1:30 p.m. to 5:00 p.m. (or until recessed)  
April 3 - 5, 2024: 9:00 a.m. to 5:00 p.m. (or until recessed) daily  
Lakefront Anchorage Hotel, 4800 Spenard Road  
Anchorage, Alaska

*A toll-free number will be shared on our website in advance of the meeting*

On April 2, prior to the start of the Public Meeting, the Federal Subsistence Board will meet at 9:00 a.m. to conduct Tribal Government-to-Government and ANCSA Corporation consultations regarding proposals to change Federal subsistence management regulations for the harvest of wildlife on Federal Public lands and waters in Alaska. **The Public Meeting will begin at 1:30 p.m.**

Updates on the Board's progress through the agenda will be posted on the Federal Subsistence Management Program website at <https://www.doi.gov/subsistence/board/> and on Facebook at [www.facebook.com/subsistencealaska](https://www.facebook.com/subsistencealaska).

Updates may also be received by calling (800) 478-1456 or (907) 786-3888.

**Public Meeting**

**\* Asterisk denotes Action Item**

- 1. Call to Order and Welcome**
- 2. Review and Adopt Agenda\***
- 3. Federal Subsistence Board Information Sharing Session**
- 4. Regional Advisory Council Chairs Discuss Topics of Concern with the Board**
- 5. Public Comment Period on Non-Agenda Items**  
*(This opportunity is available at the beginning of each day)*
- 6. 2021–2023 Subparts C&D Proposals and Closure Reviews (Wildlife Regulations)**
  - a. Tribal Government-to-Government and ANCSA Corporation Consultation Summary
  - b. Announcement of Consensus Agenda *(see detailed agenda that follows)*
  - c. Public Comment Period on Consensus Agenda Items *(This opportunity is available at the beginning of each subsequent day prior to the final action)*
  - d. Board deliberation and action on Non-Consensus Agenda items\*  
*(see detailed agenda that follows)*

- e. Adoption of Consensus Agenda\*

**7. RFR22-01 Request for Reconsideration of Fisheries Proposal FP21-10 \***

**8. Delegation of Authority Letters\* (*Requests to change existing letters*)**

- a. Unit 6 Deer
- b. Units 17A & 17C Nushagak Caribou

**9. Council Correspondence to the Board Update**

**10. Schedule of Upcoming Board Meetings\***

- a. 2024 Summer Work Session and Executive Session (*Council Annual Report Replies & Council Appointment Recommendations*)
- b. 2025 Winter Public Meeting (*Fish and Shellfish Regulations – Date Options*)

**11. Adjourn**

## FEDERAL SUBSISTENCE BOARD

### CONSENSUS AGENDA

The following proposals and closure reviews have been included on the consensus agenda. These are proposals and closure reviews for which there is agreement among Federal Subsistence Regional Advisory Councils, the Federal Interagency Staff Committee, and the Alaska Department of Fish and Game concerning Board action. Anyone may request that the Board remove a proposal or closure review from the consensus agenda and place it on the regular agenda. The Board retains final authority for removal of proposals and closure reviews from the consensus agenda. The Board will take final action on the consensus agenda after deliberation and decisions on all other proposals and closure reviews.

<b>Proposal/Closure Review</b>	<b>Unit/Species</b>	<b>Recommendations</b>	<b>Page</b>
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WCR24-29	Unit 22 / Muskox	Retain Status Quo	305
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WCR24-44	Unit 22 / Muskox	Retain Status Quo	330
WCR24-15	Unit 22 / Moose	Retain Status Quo	344
WCR24-19	Unit 23 / Muskox	Rescind the Closure	361
WCR24-35	Unit 12 / Caribou	Retain Status Quo	373
WCR24-42	Unit 12 / Caribou	Retain Status Quo	396
WP24-34	Unit 25D West / Moose	Withdrawn	NA
WP24-35	Unit 25D West / Moose	Withdrawn	NA

## FEDERAL SUBSISTENCE BOARD NON-CONSENSUS AGENDA

### Procedure for considering proposals:

Analysis (*Lead Author*)

Summary of public comments (*OSM Staff*)

Open floor to public testimony

Tribal/Alaska Native Corporation comments (*Native Liaison*)

Regional Advisory Council recommendation(s) (*Chair or designee*)

Alaska Department of Fish and Game comments (*State Liaison*)

Interagency Staff Committee comments (*ISC Chair*)

Federal Subsistence Board discussion with Council Chairs and State Liaison

Federal Subsistence Board action

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WP24-09	Units 13A, 13B / Caribou	942
WP24-11	Unit 8 / Deer	Supplemental
WP24-12/13/14	Unit 9B / Moose	979
WP24-15	Unit 9C / Caribou	989
WCR24-04/06	Unit 9C & 9E / Caribou	1028
WP24-19	Unit 18 / Moose	1054
WCR24-38	Unit 18 / Moose	1071
WP24-21	Unit 18 / Moose	1083
WP24-25	Units 24A, 24B / Sheep	1115
WP24-26	Units 24A, 26B / Sheep	1136
WCR24-20	Unit 24 / Moose	1174
WP24-28	Units 21D, 22, 23, 24, 26A / Caribou	Supplemental
WP24-29	Unit 23 / Caribou	Supplemental

<b>Proposal/Closure Review</b>	<b>Region/Location/Species</b>	<b>Page</b>
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WP24-32	Units 12, 19, 20, 21, 24, 25 / Marten	Supplemental
WP24-33	Units 25B, 25C, 25D / Moose	1229
WP24-36	Unit 25A / Sheep	1250
WCR24-21	Unit 25A / Sheep	1261
WP24-37/38	Unit 26C / Muskox	1304
WCR24-31	Unit 26 / Moose	1328

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<b>WP24-05 Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP24-05 requests to close the Northeast Chichagof Controlled Use Area (NECCUA) to deer hunting by non-federally qualified users from Nov. 1-15. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Unit 4 Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31</i> <span style="float: right;"><i>Aug. 1 – Jan. 31</i></span></p> <p><b><i>Federal public lands of the Northeast Chichagof Controlled Use Area are closed to deer hunting Nov. 1-15, except by federally qualified subsistence users hunting under these regulations.</i></b></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>OSM Conclusion</b>	<b>Support with modification</b> to remove Wildlife Analysis Areas 4222, 4252, 4253, and 3526 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10.
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	<p><b>Support with modification</b> to remove Wildlife Analysis Areas 4222 and 3526 from the proposed closure area and reduce the proposed closure period from Nov. 1-15 to Nov. 1-10.</p> <p>OSM’s interpretation of the Council’s intent is:</p> <p><b>Unit 4 - Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31.</i> <span style="float: right;"><i>Aug. 1 – Jan. 31</i></span></p> <p><b><i>Federal public lands of the Northeast Chichagof Controlled Use area draining into the waters of Icy Strait east of Point Adolphus, including Port Frederick; and the waters of Chatham Strait south of Point Augustus and north of East Point, including Freshwater Bay are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.</i></b></p>

<b>WP24-05 Executive Summary</b>	
<b>Interagency Staff Committee Comments</b>	<p>The ISC acknowledges the extensive effort made by the Southeast Alaska Subsistence Regional Advisory Council (Council) during both the 2022-2024 and the 2024-2026 Wildlife Regulatory Cycles to help federally qualified subsistence users meet their subsistence needs for deer in the Hoonah area.</p> <p>Deer populations in Unit 4 are the highest in the state and closures are not needed for conservation reasons. The Council's justification for submitting WP24-05 focuses on the closure being necessary to continue subsistence uses due to competition and user conflict in the areas closer to Hoonah. While reported harvest success by federally qualified subsistence users appears stable over the last decade based on quantitative harvest data, federally qualified subsistence users in the area report these data underestimate hunter effort and do not capture competition that affects their ability to harvest enough deer to meet their subsistence needs.</p> <p>The ISC recognizes the effort that the Council has put into providing a meaningful subsistence priority, while trying to reduce restrictions on non-federally qualified users as much as possible. Since submission of their first proposal for the 2022 regulatory cycle, the Council reduced the duration of their requested restriction to limit non-federally qualified users to two bucks for the entire season, to a 15-day closure, to the current Council recommendation of closing for 10 days at the beginning of November and reducing the requested closure area to those areas closest to home and most utilized by Hoonah residents.</p>
<b>ADF&amp;G Position</b>	<b>Oppose</b>
<b>Written Public Comments</b>	<b>1 Support</b> <b>38 Oppose</b>



## STAFF ANALYSIS WP24-05

### ISSUES

Proposal WP24-05 was submitted by the Southeast Alaska Subsistence Regional Advisory Council (Southeast Council). The proponents are requesting to close the Northeast Chichagof Controlled Use Area (NECCUA) to deer hunting by non-federally qualified users (NFQUs) from Nov. 1-15 (see **Figure 1**). The NECCUA is located on northeastern Chichagof Island and corresponds approximately to Wildlife Analysis Areas (WAAs) 3523, 3524, 3525, 3526, 3551, 4222, 4252, and 4253 (see **Figure 2**).

### DISCUSSION

The proponents submitted WP24-05 to establish a meaningful preference for the continuation of subsistence uses of deer by federally qualified subsistence users (FQSUs) in the Hoonah area. Hoonah residents depend on deer as a key component of their subsistence way of life. However, the proponents assert that residents in this area have been experiencing difficulties harvesting enough deer to meet their subsistence needs because of increasing competition and user conflicts with non-federally qualified users (NFQUs). Large numbers of NFQUs come to Hoonah via ferry during the deer hunting season. The proponents assert that the amount of non-federally qualified hunters utilizing the area in recent years has often clogged the roads with large campers, trailers, and tents that remain in the area for long periods of time. Both FQSUs and NFQUs prefer hunting the road system around Hoonah because it is safer than hunting by boat. This creates issues of over-crowding and hunting safety concerns as well as inhibits access to hunting areas by FQSUs who cannot find a place to park or camp. This influx of NFQUs also substantially increases competition for deer. Whitestone Harbor and Freshwater Bay are examples of areas where these issues regularly occur. NFQUs may also decrease the success of FQSUs if they shoot at deer and miss, causing the deer to be more skittish and wary of hunter presence.

Subsistence livelihoods depend upon effective and efficient harvests. The proponents explain that the proposed two-week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons. First, the deer are still fat, providing the highest quality and amount of meat. Second, the deer are in rut, making them more susceptible to harvest. Third, weather conditions are typically favorable for hunting and proper meat processing.

The proponents assert that this two-week closure would allow for the continuation of subsistence uses and provide a meaningful subsistence priority, enhancing opportunity for subsistence users and helping them meet their subsistence needs by reducing competition and improving access to hunting areas during the most important time of year for subsistence deer hunting. Additionally, the proponents note that the proposed closure area is limited in scope but represents the area most hunted by Hoonah residents. The proponents believe this closure will have a relatively small impact on NFQUs who would maintain significant time and space to hunt deer in Unit 4, but it will provide vital benefits to local subsistence users.

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

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

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

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

***Federal public lands of the Northeast Chichagof Controlled Use Area are closed to deer hunting Nov. 1-15, except by federally qualified subsistence users hunting under these regulations.***

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

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

<i>Residents - 3 deer total</i>	<i>Bucks</i>	<i>Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>Sept. 15 - Dec. 31</i>
<i>Nonresidents – 2 Bucks</i>	<i>Bucks</i>	<i>Aug. 1 – Dec. 31</i>
<i>Remainder</i>		
<i>Residents - 6 deer total</i>	<i>Bucks</i>	<i>Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>Sept. 15 – Dec. 31</i>
<i>Nonresidents – 2 Bucks</i>	<i>Bucks</i>	<i>Aug. 1 – Dec. 31</i>

**Extent of Federal Public Lands/Waters**

Unit 4 is comprised of approximately 96% Federal Public Lands, of which of 99% are U.S. Forest Service (USFS) managed lands, and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (Error! Reference source not found.). Unit 4 consists primarily of Admiralty, Baranof, and Chichagof Islands, along with some smaller adjacent islands. The proposed closure area (The NECCUA) is located on northeastern Chichagof Island and corresponds approximately to Wildlife

Analysis Areas (WAAs) 3523, 3524, 3525, 3526, 3551, 4222, 4252, and 4253 (see **Figure 2**). Combined, this proposed closure area would compose roughly 48% of Chichagof Island (see **Table 1**).

**Table 1.** Proposed Closure Area in Relation to Chichagof Island

<b>Location</b>	<b>Total Area (sq. mi.)</b>
WAA 3523	108
WAA 3524	84
WAA 3525	149
WAA 3526	110
WAA 3551	116
WAA 4222	225
WAA 4252	106
WAA 4253	90
Chichagof Island	2049

### **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.



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





**Figure 2.** Proposed Closure Area (NECCUA) in relation to Hoonah, Gustavus, and Wildlife Analysis Areas (For Informational Purposes Only).

## Regulatory History

Except for the 1992/93 and 1993/94 regulatory years, the Federal harvest season for deer in Unit 4 has been from August 1 to January 31, with a harvest limit of six deer. However, harvest of antlerless deer has only been permitted from September 15 to January 31. In 1992, in response to several deep snow winters, the northern Baranof Island area harvest limit was reduced to four deer, the season was shortened to December 31, and the area closed to non-federally qualified users (NFQUs). In 1993, the northeast Chichagof Island area was closed to the harvest of deer by NFQUs after November 1 (OSM 2022a).

From the late 1980s through 1991, the State general season in the northeast Chichagof area had a harvest limit of three deer. However, during this time, the State subsistence season allowed for the harvest of six deer, with the season running from August 1 through January 31. Since 1992, the State deer season has been from August 1 through December 31, with the harvest of antlerless deer only permitted from September 15 through December 31. For Chichagof Island east of Port Frederick and north of Tenakee Inlet, including all drainages into Tenakee Inlet, the State harvest limit has been three deer. The State harvest limit for the remainder of Unit 4 was four deer, until 2019, when it was increased to six deer.

In 2000, two proposals addressing Unit 4 deer regulations were submitted by members of the public during the Federal wildlife regulatory cycle (WP00-08 and -09). These proposals were motivated by conservation concerns following heavy snow winters during the 1998-1999 season, the increased winter deer mortality typically associated with heavy snows, decreased deer habitat due to recent logging in the area, and increasing hunting pressure enabled by logging road construction (OSM 2000). One proposal requested to rescind the January Federal deer season in Unit 4, while the other requested to rescind the January deer season and reduce the harvest limit from six deer to four deer. Both proposals were rejected by the Federal Subsistence Board (Board), consistent with the recommendations of the Southeast Council. The stated justification was that the available deer population and harvest survey data for Unit 4 did not indicate a conservation concern, and that the proposed changes would unnecessarily restrict subsistence opportunity (FSB 2000).

In 2010, three proposals addressing Unit 4 deer regulations were submitted during the Federal wildlife regulatory cycle (WP10-13, -14, and -21). These proposals were submitted following significant deer population declines that had occurred during the deep snow winters of 2006 through 2009. WP10-13 was submitted by the Southeast Council, requesting to close the female deer season on January 15 in that portion of Unit 4 draining into Chatham Strait, Peril Strait, and Icy Strait, including Tenakee Inlet. WP10-14 was submitted by the Southeast Council, requesting to close Federal public lands in the Northeast Chichagof Controlled Use Area (NECCUA) to the harvest of female deer by NFQUs in December. WP10-21 was submitted by the Southeast Council, requesting that deer harvest on the Federal public lands of the NECCUA be restricted to residents of Hoonah. None of these proposals were adopted by the Board. Instead, Federal and State managers closed the female deer season in the NECCUA for the 2010 regulatory year, and part of the 2011 and 2012 regulatory years. These closures were enacted to help the deer population recover from the deep-snow winters of 2006 through 2009.

In 2012, one proposal concerning Unit 4 deer regulations was submitted during the Federal wildlife regulatory cycle (WP12-06). This proposal sought to address population concerns following the deep snow winters of 2006 through 2009, by rescinding the January deer season in Unit 4. The Board rejected this proposal because it was determined that rescinding the January season would unnecessarily restrict subsistence users, while providing little conservation benefit (FSB 2012). Based on available survey and harvest data, Federal and State managers believed that the Unit 4 deer population had completely recovered from the previous deep-snow winters by the 2013 season (OSM 2022a).

In 2019, the Alaska Board of Game (BOG) adopted Proposal 18, increasing the State general season harvest limit from four deer to six deer in Unit 4 Remainder. The stated justification was that additional sustainable harvest opportunity could be provided because there were no conservation concerns.

In 2022, four proposals (WP22-07, -08, -09, -10) concerning Unit 4 deer regulations were submitted during the Federal wildlife regulatory cycle. WP22-07 was submitted by the Southeast Council, requesting that the Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner be closed to deer hunting from September 15 through November 30, except by federally qualified subsistence users (FQSUs).

WP22-08 was also submitted by the Southeast Council, requesting that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for NFQUs be reduced to two male deer. WP22-08 was originally motivated by conservation concerns for the local deer population and an effort to prevent further depletion of the population by reducing hunting pressure from NFQUs (OSM 2022b). The proponents asserted that this change would also help increase harvest opportunity for FQSUs in these areas (OSM 2022b). The current proposal, WP24-05, is similar to WP22-08 in that it also requests a change to deer hunting regulations for NFQUs in the NECCUA. However, WP24-05 requests a fifteen-day closure to deer hunting by NFQUs instead of a harvest limit reduction in this area. Further, as stated in the discussion section, WP24-05 is primarily motivated by concerns that high levels of competition from non-local hunters in the NECCUA are posing a threat to the continuation of subsistence for local FQSUs.

WP22-09 was also submitted by the Southeast Council in 2022, requesting that the Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) be closed to deer hunting October 15 through December 31, except by FQSUs. Like WP22-07 and -08, the stated intent of WP22-09 was to protect local deer populations from further depletion by reducing hunting pressure from NFQUs (OSM 2022a, 2022b, 2022c).

WP22-10 was submitted by Patricia Phillips of Pelican in 2022. This proposal requested that the deer harvest limit for NFQUs in Lisianski Inlet and Lisianski Strait in Northwest Chichagof be reduced to 4 deer. The stated intent of WP22-10 was to reduce deer hunting pressure, provide for a meaningful subsistence priority, and thereby increase the ability of FQSUs to meet their subsistence needs (OSM 2022d).

At its April 2022 meeting, the Board rejected WP22-09 as part of the consensus agenda. The Board deferred Proposals WP22-07, -08, and -10 to its winter 2023 regulatory meeting, requesting the various user groups in the area work together to create more mutually acceptable solutions to the issues surrounding deer harvest in Unit 4 (FSB 2022).

The Office of Subsistence Management (OSM) subsequently organized an open, public meeting regarding the deferred deer proposals for Unit 4 in August 2022. The meeting provided an opportunity for different user groups to discuss their recent deer hunting experiences in Unit 4, their plans for future harvest, and how the proposals might impact them. Additionally, participants were asked if they had specific recommendations on these proposals or if they had any other suggestions for the Board that would help resolve these issues (OSM 2022a).

The Southeast Council modified its recommendations for WP22-07 and WP22-10 following deferral and open meeting discussion. At its fall 2022 meeting, the Southeast Council supported WP22-07 with modification to remove Wildlife Analysis Areas (WAAs) 4043, 4044, and 4054 from the proposal area and create a harvest limit for NFQUs of two male deer within the remaining area (WAAs 4041, 4042, 4055) (OSM 2022a). This modification reduced the proposal area to roughly half of its original size and allowed for some harvest by NFQUs in the remaining proposal area (SERAC 2021b). This modification was recommended to focus the proposal on the area most utilized by FQSUs and to reduce the potential impact of the proposal on NFQUs (SERAC 2021b).

At the same meeting, The Southeast Council supported WP22-10 with modification to reduce the harvest limit for NFQUs to two male deer, and to maintain the same proposal area as recommended in Fall 2021. This modification was recommended because it was suggested that a harvest limit reduction of four deer or three male deer would not provide a significant conservation benefit or substantially enhance the success rates of FQSUs, but that the situation in the Northwest Chichagof proposal area might not warrant a full closure to NFQUs (SERAC 2021b). The Southeast Council also felt that reducing the harvest limit to two male deer for NFQUs would reduce administrative complexity and enforcement issues by aligning the proposed harvest limit reduction for the Northwest Chichagof area (WP22-10) with that of the Northeast Chichagof area (WP22-08) and Southwest Admiralty Island (SERAC 2022b). The Southeast Council retained its original Fall 2021 recommendation of support for WP22-08 without modification, to reduce the harvest limit for NFQUs hunting in the NECCUA to two male deer (OSM 2022b). The Southeast Council noted that all three proposals were still intended to help protect local deer populations from further depletion by reducing hunting pressure from NFQUs, and thereby increase harvest opportunity and provide for a meaningful subsistence preference for FQSUs in these areas (OSM 2022a, 2022b, 2022c).

All three proposals (WP22-07, 08, and -10) were subsequently rejected by the Board at its February 2023 regulatory meeting (FSB 2023). The stated justification was that the available data on deer populations in Unit 4 did not meet the criteria necessary to close land or implement harvest restrictions for the purposes of conservation or the continuance of subsistence uses under §815(3) of ANILCA (FSB 2023). Recent ADF&G survey and harvest data indicated that overall deer populations in Unit 4 were among the highest in the State and that FQSUs in these areas were generally effective and efficient deer



harvesters (FSB 2023). However, the Board member from the Bureau of Indian Affairs dissented on the basis that local ecological knowledge and testimony had been provided through the regulatory process, which indicated that FQSUs were having difficulty harvesting sufficient deer in the areas covered by the proposals (FSB 2023).

The BOG acted on State Proposals 10 and 11 at their January 2023 Southeast Region regulatory meeting (ADF&G 2022a). These proposals requested reducing the harvest limit for residents and nonresidents to four deer in Unit 4 Remainder. The proponents for both proposals listed the possible closure of Federal lands to deer hunting by NFQUs as a key factor in submitting their proposals. Both proponents suggested that a harvest limit reduction would protect deer populations, help reduce user conflicts in Unit 4, and avoid a closure of Federal public lands to NFQUs. The BOG adopted Proposal 10, with modification to reduce the nonresident harvest limit throughout all of Unit 4 to two male deer (ADF&G 2023a). The resident harvest limit remained three deer in Unit 4, Chichagof Island east of Port Frederick and north of Tenakee Inlet, and six deer in Unit 4 Remainder. The BOG took no action on Proposal 11, due to the action taken on Proposal 10.

### **Current Events**

Two other proposals concerning deer regulations in Unit 4 were submitted for the 2024 Federal subsistence wildlife regulatory cycle. WP24-04 was submitted by the Southeast Council, requesting to close a portion of southwestern Admiralty Island around Angoon to deer hunting by NFQUs, from November 1-15. WP24-06 was submitted by the Southeast Council, requesting to close a portion of northwest Chichagof Island around Pelican to deer harvest by NFQUs from November 1-15.

The Hoonah Indian Association received funding through the USFS Southeast Alaska Sustainability Strategy program to collect community harvest and biological information about deer on the north end of Chichagof Island from 2022-2027. This project is being carried out in the communities of Hoonah, Pelican, and Gustavus. A North Unit 4 Deer Working Group has also been established under the guidance of the Hoonah Indian Association Environmental Programs (HIA Environmental 2023a). The first meeting of this group was held on March 15, 2023. Preliminary information from HIA subsistence surveys and the deer working group has been integrated into the analyses for WP24-05 and WP24-06. HIA was not able to conduct surveys in Angoon.

At its fall 2023 meeting, The Southeast Council voted to support the current proposal (WP24-05) with modification to remove WAAs 3526 and 4222 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (see **Figure 6**). The Council felt this action was necessary to support the continuation of subsistence uses in this area, while also causing the least possible impact to non-federally qualified users (SERAC 2023).

### **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation where less snow accumulates, and forests provide increased foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet the energetic needs of lactating does. Migratory

deer follow the greening vegetation up to alpine for the summer. Resident deer remain at lower elevations. The breeding season, or rut, generally occurs in October through November, and peaks in late November (ADF&G 2009). Wolves and black bears are not present in Unit 4, so their primary predators in the area are humans and brown bears. Brown bears are estimated to kill an amount of deer equal to 15%-20% of the total annual deer harvested by hunters (Mooney 2009). Significant changes in deer populations and localized deer density levels are relatively normal over time in Unit 4 (Bethune 2020). Periodic declines are often attributable to severe winter weather, particularly deep snow events (Bethune 2020; Olson 1979). This issue is illustrated in the regulatory history, and the frequency with which proposals to change Unit 4 deer hunting regulations follow heavy snow winters.

### Habitat

Unit 4, like most of Southeast Alaska, has a maritime climate characterized by high rainfall and moderate summer and winter temperatures (Bethune 2020). However, the amount of rain and snow received can vary significantly from year-to-year, and across the unit (Bethune 2020). The landscape of Unit 4 is characterized by steep and rugged terrain with mountains, fjords, estuaries, and short, swift rivers (Bethune 2020). Vegetative communities occurring at low to moderate elevations (<1,500 feet) “are dominated by western hemlock (*Tsuga heterophylla*) and Sitka spruce (*Picea sitchensis*), with western red cedar (*Thuja plicata*) and Alaskan yellow cedar (*Chamaecyparis nootkatensis*) old-growth forests. Mixed conifer muskeg and deciduous riparian forests are also common. Mountain hemlock (*Tsuga mertensiana*) comprises a subalpine timberline band between 1,500 - 2,500 feet in elevation” (Bethune 2020: 4).

Old-growth forests are considered primary deer winter range, in part because the complex canopy cover allows sufficient sunlight through for forage plants to grow but intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats (McCoy 2017). Some areas of Unit 4 have been significantly impacted by large-scale changes in habitat due to logging, while the habitat in other areas is largely intact. Areas with substantial timber harvest, such as the NECCUA, are expected to have lower deer carrying capacity compared to pre-harvest conditions. As Brinkman and colleagues (2009) have noted for a similarly logged area on Prince of Wales Island, deer may shift their activity patterns in response to intensive logging and subsequent forest succession. The density of deer in these areas may decline as even-aged young-growth stands progress beyond shrub and sapling stages to stem exclusion forests characterized by thick canopies and sparse understory browse (Brinkman et al. 2009: 39).

### General Population Information for Unit 4

Monitoring deer populations in forested habitat is challenging, as the total number of deer cannot be directly counted through ground or aerial surveys (Brinkman et al. 2013). Changes in deer populations in Unit 4 have historically been monitored using three complementary methods: deer pellet surveys, hunter harvest and effort reporting, and aerial alpine surveys. Winter body condition and beach mortality surveys may also be conducted to understand changes in the health and abundance of area deer populations (Bethune 2020).

Deer pellet surveys have been used in the Southeast region since 1981 to monitor deer population trends and document substantial changes ( $\geq 30\%$ ) in deer density in specific watersheds (McCoy 2017). An average of  $<1.00$  pellet group per survey plot generally indicates a low-density deer population, an average of  $1.00 - 1.99$  pellet groups per survey plot indicates a moderate-density population, and an average of  $>2.00$  pellet groups per survey plot typically indicates a high-density population (Kirchoff and Pitcher 1988, Bethune 2022a). Deer pellet survey data, however, is typically interpreted with caution, “as factors other than deer population size can affect deer pellet-group density” (McCoy 2017: 2). Issues such as winter severity and snowfall patterns, temperature and humidity, variability in survey effort, the length of time since the last survey, timing of vegetation green-up and changes in pellet group detectability, and changes in habitat can all impact pellet-group density and/or detection (McCoy 2017).

A recent deer pellet study conducted by Brinkman and colleagues (2013) on Prince of Wales Island using DNA-based methods found that current ADF&G/USFS deer pellet survey techniques did not provide an accurate index of deer populations when extrapolated across time, or beyond the local scale. As the researchers noted:

Over the past 3 decades, ADF&G and USFS have used deer pellet counts as the primary tool to monitor deer population trends. Precise estimates of trends in deer abundance are needed because perceived fluctuations in the deer population size above or below a predetermined population objective set by ADF&G results in changes in harvest regulations. Despite heavy reliance on these data, pellet group counts of black-tailed deer were compared with an independent measure of [deer] population size only once. In that study, 13 radio-collared deer were introduced to a small (approx. 40 ha) island in southeast Alaska. Researchers returned to the island 264 days later and surveyed 1.9% of the island for pellet groups. Data from that study indicated that a pellet group density of  $0.05$  pellet groups/ $m^2$  represented  $12$  deer/ $km^2$  ( $95\%$  CI =  $10.7$  deer/ $km^2$  –  $13.8$  deer/ $km^2$ ). This estimate assumed constant pellet persistence, detection, and deposition rates. Unfortunately, data were obtained only during a single year, which prevented any evaluation of how well pellet groups deposited during winter tracked changes in deer population. Also, only 4 deer remained on the island (6 swam off and 3 died) when researchers returned to conduct pellet group counts, which complicated the association between deer numbers and number of pellet groups encountered. Moreover, the island was much smaller than typical deer home ranges (which likely concentrated deer activity) and habitat diversity was low when compared with typical deer ranges in southeast Alaska. Consequently, the usefulness of the study for evaluating the reliability of pellet-group surveys as conducted by ADF&G and USFS personnel was limited (Brinkman et al. 2013: 445).

Brinkman and colleagues (2013) also noted that though their deer pellet index was not directly comparable to that developed by ADF&G/USFS because of different methodologies, their model suggested that a similar deer pellet density of  $0.05$  pellet groups/ $m^2$  across a mosaic of habitat types on Prince of Wales Island would indicate a minimum deer count of  $2.9$  deer/ $km^2$ , with a much wider margin of error ( $95\%$  CI =  $0.4$  deer/ $km^2$  –  $24.3$  deer/ $km^2$ ). Previous pellet group count studies conducted

outside of Alaska that demonstrated the usefulness of pellet-group counts were conducted under conditions that are difficult to replicate with unenclosed populations of deer in unmanaged landscapes (Brinkman et al 2013). The researchers concluded:

The variation we reported between estimates of pellet-group counts and deer counts at the transect level do not support the use of pellet-group count surveys to reliably monitor trends in deer populations at larger spatial scales. Indeed, during our study, pellet-group data aggregated within watersheds did not reflect the decline in deer count within those watersheds. For instance, in the Staney watershed, DNA results indicated a 24% decline in minimum deer count from 2006 to 2008, whereas pellet group counts indicated a 17% increase over the same years (Brinkman et al. 2013: 449).

Further, as Bethune (2022a: 6) notes:

Sitka black-tailed deer density estimates on old growth winter range vary widely (10 – 57 deer/km<sup>2</sup> or 26 – 148 deer/mi<sup>2</sup>). The most accurate deer estimates to date for Southeast Alaska come from Brinkman et al. (2011), who estimated density using a fecal DNA-based mark-recapture design on Prince of Wales Island. In addition, McCoy et al. (2014) also estimated density using fecal DNA with both mark-recapture and spatial mark-recapture models on northeastern Chichagof Island. Brinkman et al. (2011) estimated 12 deer/km<sup>2</sup> (31 deer/mi<sup>2</sup>) in unmanaged (unlogged) forest lands with a range of 8.5 – 17 deer/km<sup>2</sup> (22 – 44 deer/mi<sup>2</sup>) across all habitat types. McCoy et al. (2014) estimated densities ranging from 4.4 deer/km<sup>2</sup> (11.4 deer/mi<sup>2</sup>) to 11.9 deer/km<sup>2</sup> (30.8 deer/mi<sup>2</sup>) based on the year and analysis used. In comparison, Kirchhoff (1994) estimated an average density of 35.6 deer/km<sup>2</sup> (92 deer/mi<sup>2</sup>) based on pellet group counts. Density-estimate techniques using fecal DNA are some of the most advanced applications available to managers and can provide precise estimates; but they can be expensive, labor intensive, and results are only applicable to small areas.

#### Population Information for the Proposal Area

A deer pellet survey was conducted at Pavlof Harbor in 2019, along the southern portion of the proposal area, near Tenakee Springs (McCoy 2019). The average of 2.47 pellet groups per plot counted for this survey is considered to indicate a high-density deer population in the area (see **Table 2**). This count also represented a 39% increase in average pellet-groups counted during the last survey conducted at Pavlof Harbor in 2010 (McCoy 2010). There have been no recent deer-pellet surveys conducted closer to Hoonah. Yet, as the ADF&G Regional Supervisor explained during a recent Southeast Council meeting, “deer pellet densities in Game Management Unit 4, no matter where you do them, are always the highest in the region” (SERAC 2021b: 476). However, he also noted that “The department does not monitor deer populations in these relatively small areas affected by the proposal. We monitor deer populations on a unit-wide level” (SERAC 2021b: 351). This statement, as well as the previously mentioned study by Brinkman and colleagues (2013), lends credence to local testimony presented at recent Southeast Council meetings that deer populations may not be tracked at a fine enough scale to capture periodic, localized depletions (see SERAC 2021b).

Before 2019, the most recent deer pellet surveys conducted on Chichagof Island were taken at Finger Mountain in 2011, 2015, 2017, and 2018. Results from the 2015 survey at Finger Mountain indicated a 55% decrease in pellet groups from the survey conducted in 2011 (see **Table 2**, Bethune 2022a). However, results from the 2017 pellet survey at Finger Mountain indicated a slight increase in pellet groups from 2011 levels (**Table 2**). Results from the 2018 survey at Finger Mountain indicated a 13% decrease from 2011 levels (**Table 2**). It should also be noted that results from the 2019 survey at Pavlof Harbor were approximately 32% lower than the levels reported for Finger Mountain in 2018 (**Table 2**).

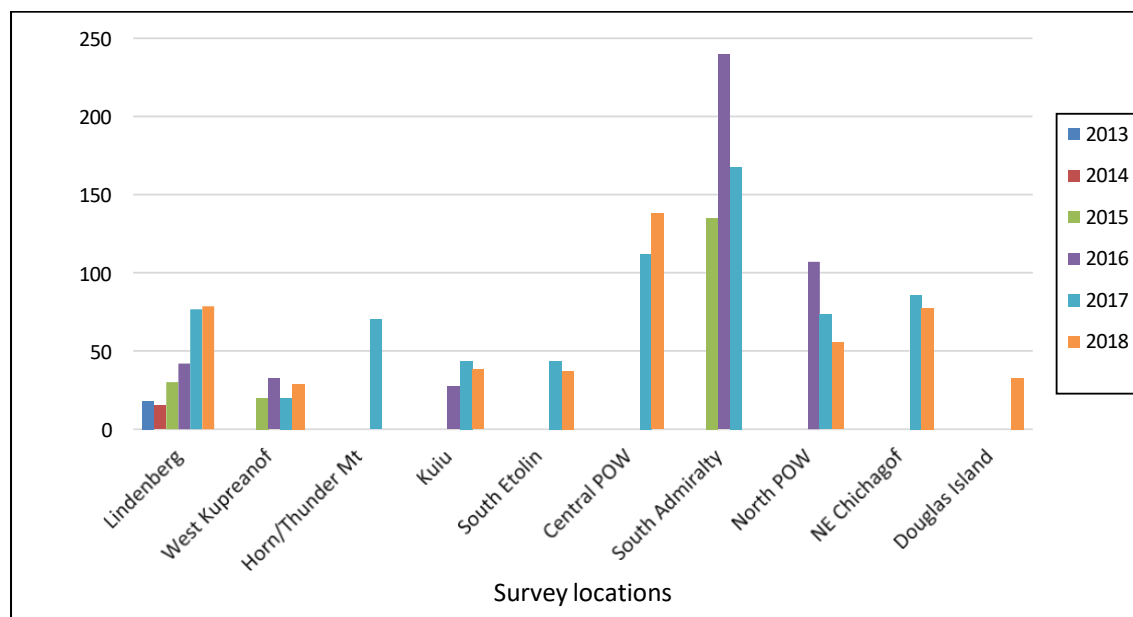
**Table 2.** Average Deer Pellet Groups per Plot from Surveys recently conducted in Unit 4 (Bethune 2022a).

Area	Specific Location/VCU	Survey Year	Average Pellet Groups per Plot	Number of Plots
<b>Chichagof Island</b>	Finger Mountain/247	2011	4.13	209
	Finger Mountain/247	2015	1.86	197
	Finger Mountain/247	2017	4.29	217
	Finger Mountain/247	2018	3.61	261
<b>Chichagof Island</b>	Pavlof Harbor/218	2019	2.47	295
<b>Baranof Island</b>	Nakwasina/300	2011	3.87	192
	Nakwasina/300	2015	2.02	207
	Nakwasina/300	2016	4.37	230
	Nakwasina/300	2017	3.24	229
	Range Creek/288	2018	2.01	375
	Kelp Bay/298	2021	2.44	257
<b>Admiralty Island</b>	Hawk Inlet/128	2017	2.11	279
	Barlow Cove/125	2018	2.38	351
	Pybus Bay/182	2019	2.82	234

Aerial alpine deer survey work began in 2013, as an effort to provide a new, timelier method to assess and monitor the abundance of deer in alpine areas (Bethune 2020). These surveys are intended to be flown each summer before the hunting season, with deer seen per survey hour constituting the standard unit of measurement (Bethune 2020). As Bethune (2020: 25) notes, “The alpine survey technique appears to be a useful tool for gauging deer abundance immediately prior to hunting season. However, research is needed to learn more about what alpine surveys tell us about the larger deer population.”

Aerial alpine surveys were conducted over two locations in Unit 4 between 2016 and 2020 (Bethune 2022a). Surveys were flown over Southern Admiralty Island in 2015-2017, and Northeast Chichagof Island in 2017 and 2018 (Bethune 2022a). Southern Admiralty Island exhibited the highest deer seen per hour of any survey location in Southeast Alaska, while Northeast Chichagof exhibited numbers similar

to north Prince of Wales Island (POW), where a harvest limit reduction and fifteen-day closure to NFQUs is currently in effect (see **Figure 3**). Aerial surveys were not conducted in 2019 and 2020 due to COVID-19 restrictions (Bethune 2022a).



**Figure 3.** Average Number of Deer Counted per Hour during Mid-Summer Aerial Alpine Surveys in Southeast Alaska, 2013 – 2018 (Bethune 2022a).

Annual harvest data estimated from harvest reports can also provide another indicator of deer population status, and potential change over time (Bethune 2022a). The most recently estimated five-year average (2016-2020) for all reported harvests in Unit 4 was approximately 5,742 deer per year (see **Table 3**). During this time, the greatest amount of harvest occurred on Chichagof Island, followed by Baranof Island and Admiralty Island (Bethune 2022a). The total estimated per year harvest average during this period was very similar to the average of 5,674 deer harvested each year during the previous five-year reporting period from 2011-2015 (**Table 3**). The greatest amount of harvest during the 2011-2015 reporting period also took place on Chichagof Island, followed by Baranof Island and Admiralty Island (Bethune 2020). The average number of all hunters hunting in Unit 4 each year increased slightly between these five-year reporting periods (+4%), while the average number of total hunter days per year decreased slightly (-3%) (**Table 3**). Still, the harvest levels estimated for the two most recent five-year reporting periods (2011-2015 & 2016-2020) are substantially lower than those estimated for the 2001-2005 reporting period (**Table 3**). Yet, the estimated average number of hunters hunting each year during these three reporting periods (2011-2005; 2011-2015; 2016-2020) is quite similar (**Table 3**).

**Table 3.** Estimated Total Harvests and Hunting Effort in Unit 4 during Recent Five-Year Reporting Periods (ADF&G 2005-2006, 2006-2007; Mooney 2007, 2009, 2011, 2015; Bethune 2020, 2022a).

Year	Total Hunters	Total Hunter Days	Total Harvests in Unit 4
2001	3581	-	7457
2002	3414	-	5117
2003	3637	-	7621
2004	3363	-	6787
2005	3166	-	6983
<b>5 Year Average</b>	<b>3432</b>	<b>-</b>	<b>6793</b>
2006	3057	-	7741
2007	1999	-	1846
2008	2378	-	3855
2009	2280	-	3909
2010	2709	-	4688
<b>5 Year Average</b>	<b>2485</b>	<b>-</b>	<b>4408</b>
2011	3157	14020	6909
2012	3103	12214	4853
2013	3248	13094	5409
2014	3435	13815	4694
2015	3733	15183	6505
<b>5 Year Average</b>	<b>3335</b>	<b>13665</b>	<b>5674</b>
2016	3742	14535	7192
2017	3478	12555	5255
2018	3449	13425	5229
2019	3382	12870	5979
2020	3252	12712	5055
<b>5 Year Average</b>	<b>3461</b>	<b>13219</b>	<b>5742</b>
<b>Overall Average</b>	<b>3178</b>	<b>13442</b>	<b>5654</b>

Recently reported five-year harvest and hunting efforts in the proposal area follow somewhat different trends. This issue is discussed in detail in the harvest history section of the analysis because it is important to consider in light of the proponents' statements about increased competition impacting Hoonah residents and other FQSUs' deer hunting efforts in the proposal area.

Based on the combination of harvest data, pellet survey data, aerial surveys, and related information, managers in the area assert that the overall deer population in Unit 4 has recovered from the population declines suffered during the severe winters of 2006-2008, and it may be reaching winter carrying capacity in some areas (Bethune 2022a). Most recently, the heavy snowfall that took place in December 2021 led to concerns about over-winter mortality. However, the rest of the 2021-2022 winter exhibited mild to average weather conditions and the mortality surveys conducted in the spring of 2022 found that

over-winter mortality was not higher than normal, and that the body condition of live deer was similar to that seen in previous years (Bethune 2022b).

## **Cultural Knowledge and Traditional Practices**

### Community Characteristics

Four communities are located within the proposed closure area (the NECCUA): Hoonah, Game Creek Census Designated Place (CDP), Tenakee Springs, and Whitestone Logging Camp CDP (see **Table 4**). Hoonah is a Tlingit community of long standing, situated at the entrance to Port Frederick, about 40 miles west of Juneau. Hoonah first appeared in the US Census in 1890, though the Tlingit occupied and utilized the area for thousands of years (Ream and Sill 2017). Hoonah is now the largest and oldest community in the area. Whitestone Logging Camp and Game Creek are more recently developed communities, located along the road system a few miles southwest of Hoonah (OSM 2022b). Game Creek was founded as a religious community, first appearing in the US Census in 1990. Whitestone Logging Camp was founded by loggers and their families, also first appearing in the US Census in 1990 (OSM 2022b). Tenakee Springs is an older community located on Tenakee Inlet, about 20 miles south of Hoonah. It first appeared in the US Census in 1910 (OSM 2022b). Tenakee Springs has a year-round population, but also serves part-time residents and recreational tourists who arrive in the summer from other places within and outside of Alaska (OSM 2022b). The four communities in this area can only be accessed from the outside by plane or boat, and Tenakee Springs is not road-connected to the other communities (OSM 2022b). The State ferry system provides passenger transportation only, and local transportation is primarily by bicycle or ATV (ADCCED 2022).

Gustavus is a community located outside the NECCUA, across Icy Strait from Hoonah, near the entrance to Glacier Bay National Park. Gustavus is also heavily reliant on the proposed closure area for deer hunting (OSM 2022b), as Glacier Bay National Park is closed to subsistence hunting, fishing, and trapping. Gustavus can also only be reached by plane or boat, but it is considered the gateway to Glacier Bay National Park (OSM 2022b). Similar to Tenakee Springs, the population of Gustavus increases substantially during the summer months with the arrival of part-time residents and tourists (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 (OSM 2022b). However, ferry runs are occasionally canceled due to poor weather, mechanical issues, and other reasons (OSM 2022b). Hoonah residents also sometimes find themselves unable to secure a place on the State ferry because of the high number of people and vehicles bound for Hoonah during the deer season (SERAC 2009). Members of the Southeast Council and other residents of the area have also noted that the ferry system has not been as dependable as it was before the COVID-19 pandemic and State budget cuts (SERAC 2021b).

The populations of all five of the coastal communities located in and around the NECCUA have regularly fluctuated, primarily in response to changing opportunities for local employment through fishing, logging, tourism/service, and other industries (Ream and Sill 2017). Their combined population, however, has nearly doubled since 1960, to an estimated 1,727 people in 2020 (see **Table 4**). Hoonah



and Gustavus in particular have shown upward trends in population since the census first started collecting data for these two communities (**Table 4**). The population of Tenakee Springs has remained relatively stable for the past several decades, while the populations of Game Creek and Whitestone Camp have generally declined since the 1990s (**Table 4**).

**Table 4.** The Population Over Time of Communities Primarily Utilizing the NECCUA to Harvest Deer (ADCCED 2022).

Community	1890	1900	1910	1920	1930	1940	1950	1960	1970	1980	1990	2000	2010	2020
Game Creek	0	0	0	0	0	0	0	0	0	0	61	35	18	23
Gustavus	0	0	0	0	0	0	0	107	64	98	258	429	442	655
Hoonah	438	447	462	402	514	716	563	686	748	680	795	860	760	931
Tenakee Springs	0	0	126	174	210	188	140	109	86	138	94	104	131	116
Whitestone Camp	0	0	0	0	0	0	0	0	0	0	164	116	17	2
<b>Total</b>	<b>438</b>	<b>447</b>	<b>588</b>	<b>576</b>	<b>724</b>	<b>904</b>	<b>703</b>	<b>902</b>	<b>898</b>	<b>916</b>	<b>1372</b>	<b>1544</b>	<b>1368</b>	<b>1727</b>

The commercial economy in the Hoonah area focused on fur, fishing, and timber in the period following the Alaska Purchase (Schroeder and Kookesh 1990, Ream and Sill 2017). The development of these industries changed Huna Tlingits' control over their traditional territory and access to subsistence resources (Schroeder and Kookesh 1990, Ream and Sill 2017). Hoonah residents became heavily involved in the commercial fishing industry after World War I, working as fishers and cannery employees (Schroeder and Kookesh 1990). Hoonah developed a strong commercial salmon seining and trolling fleet during this time (Ream and Sill 2017). The most recent period of logging took place in the area in the 1980s, and an extensive network of logging roads were built around Hoonah to facilitate timber harvest (Ream and Sill 2017). These roads changed how Hoonah residents access certain subsistence resources, as well as how non-local people hunt and use the land. Active logging has been greatly reduced in recent years, but the effects of past timber harvest and road building continue to be felt in Hoonah today (Ream and Sill 2017: 110). Commercial salmon and halibut fishing remain important industries in the area, however, tourism has been growing as an economic driver (Ream and Sill 2017). One of the original canneries in the area, The Hoonah Packing Company, was recently converted to a tourist destination named Icy Strait Point, which employs many residents (Ream and Sill 2017). Icy Strait Point offers day excursions for wildlife viewing and outdoor recreation. These commercial activities have become important complements to the more traditional subsistence hunting and fishing practices that have taken place in the area for generations and remain key to local livelihoods and lifestyles (Ream and Sill 2017).

### Subsistence Practices

The Tlingit and many other indigenous and rural Alaskan communities regard subsistence as much more than the mere acts of harvesting, preparing, and eating the food required for nourishment (Thornton 2008). As Thornton (2008: 117) notes, the Tlingit “regard subsistence as an intricate and profound set of relationships with particular geographic settings where their social groups have dwelled historically. For

them subsistence is *haa Kusteeyi*, ‘our way of living,’ ‘real being,’ and ‘enriching existence,’ and not ‘the minimum (food, etc.) necessary to support life.’” In Hoonah and other rural communities in Unit 4, this type of perspective on subsistence still holds sway, and proposals to provide for a meaningful subsistence priority against increased hunting competition should be approached with this in mind (SERAC 2021b).

Deer have been a key subsistence resource utilized by Hoonah residents and residents of other NECCUA communities for many years (OSM 2022b), and generally represent the most significant terrestrial source of meat for rural residents of southeast Alaska (Brinkman et al. 2009). Like other Unit 4 communities, hunters in the proposal area typically utilize three general hunting strategies that are associated with specific seasons, weather, geographical locations, and deer behavior (see George and Kookesh 1982). These strategies are broadly described as the Alpine Hunt, the Muskeg and Forest Hunt, and the Beach Hunt (George and Kookesh 1982). However, due to the generally steep and rugged landscape in Unit 4, beach hunting is often a preferred hunting strategy (OSM 2022b, George and Kookesh 1982). Alpine deer hunts often require overnight camping and considerable hiking (OSM 2022b). Hunting below the timberline involves tracking, as well as luring deer to clearings (including the edges of clear-cuts) with various locally or commercially manufactured calls (OSM 2022b). Beach hunting is commonly undertaken in the early morning or at dusk, or during a minus tide when deer are feeding on beach vegetation (OSM 2022b). Hunting on beaches involves “beach combing” by boat or hiking under cover of the forest fringe (OSM 2022b). Locals also commonly harvest deer opportunistically, while engaged in other activities such as fishing (Doerr and Sigman 1986, Ream and Sill 2017).

Hoonah residents participated in comprehensive household subsistence surveys documenting their harvest and use of deer and other wild resources in the 1980s, 1990s, and 2010s (see **Table 5**, Schroeder and Kookesh 1990; Ream and Sill 2017). The other four NECCUA reliant communities participated in comprehensive subsistence surveys in the 1980s and/or the 1990s (**Table 5**). In all these studies, the vast majority of households utilized deer, and deer consistently ranked as a primary resource in terms of bulk contribution to subsistence, at times trailing only salmon, non-salmon fish, and/or berries (**Table 5**). Deer were the only type of large land mammal reported harvested by Hoonah residents during the most recently published subsistence study conducted by ADF&G in 2012 (Ream and Sill 2017). Deer were estimated to compose approximately 15% of the subsistence contribution to Hoonah household diets, trailing only non-salmon fish (35%) and salmon (21%) during this study year (Ream and Sill 2017). However, between 1996 and 2012, per capita harvests of most [subsistence] resource categories “generally declined except for non-salmon fish and vegetation” (Ream and Sill 2017: 188). This could be an indication of a decline in the available populations of key subsistence resource species like salmon and deer, increasing competition for such species, and/or changing methods and capabilities of harvest in and around Hoonah. The trend of declining per capita deer harvests continued in Hoonah in 2016 (see **Table 5**).

Subsistence studies have also illustrated the cultural importance of reciprocity and sharing of subsistence resources within the NECCUA communities, as sharing of subsistence resources and knowledge promotes sociality and future harvest success, while preventing potential wastage when subsistence

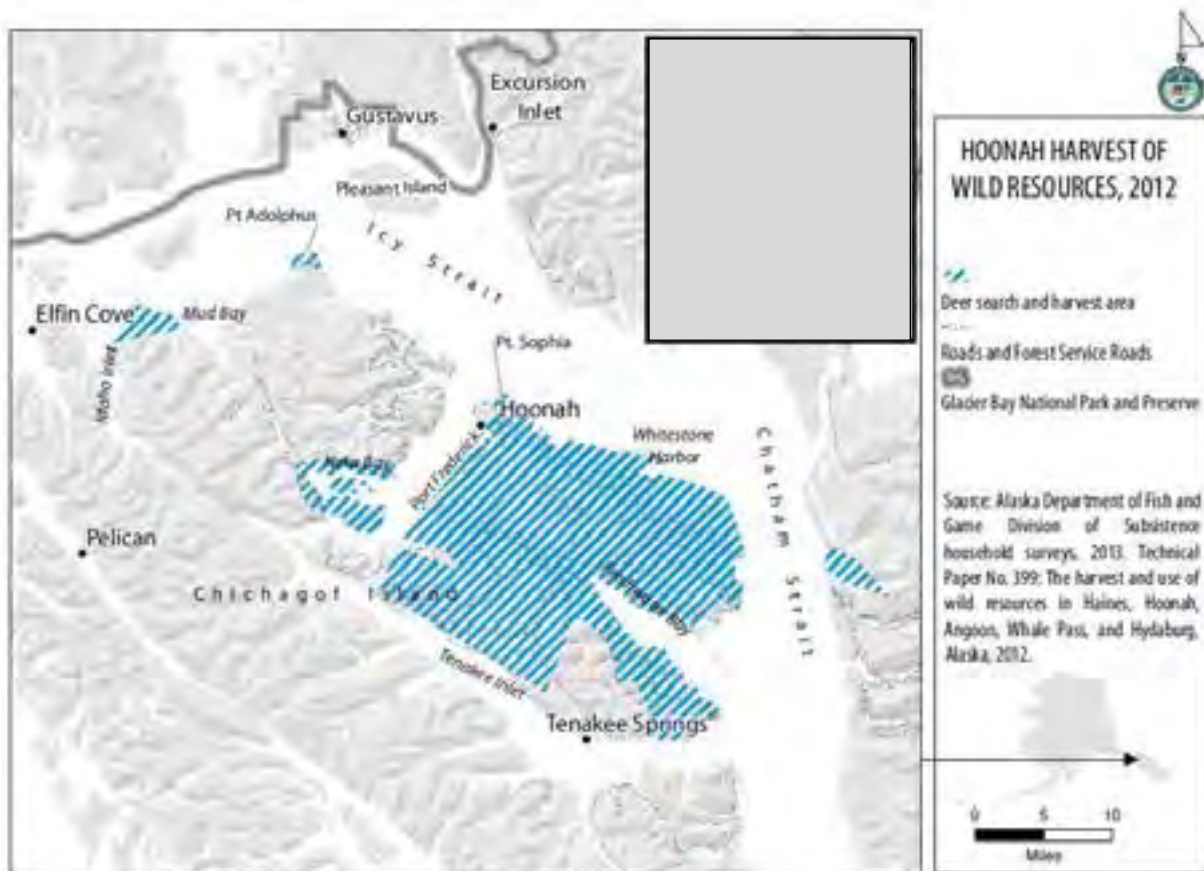
foods are harvested in abundance (**Table 5**, Langdon and Worl 1981, Langdon 2021). This is particularly the case in Hoonah, where households have generally shown a higher propensity for sharing deer meat than households in nearby communities (**Table 5**). The role of sharing to distribute subsistence-caught food within the community, and its contribution to people's survival over the generations has been described in detail by Hoonah residents during previous Southeast Council meetings and subsistence studies (SERAC 2009, 2010, 2021a; Ream and Sill 2017).

Over the five comprehensive studies conducted in Hoonah, an average of 42% of Hoonah households reported giving deer to others, while 47% of Hoonah households reported receiving deer from others (**Table 5**). An average of approximately 55% of the households in Hoonah reported harvesting deer, while an average of 85% of households reported using deer (**Table 5**). This data conforms to findings from subsistence studies conducted in many other rural Alaskan communities, where a smaller proportion of households often harvest a larger percentage of local subsistence resources, which they share or trade with other households (Wolfe and Walker 1987).

**Table 5.** Estimated Harvest, Use, and Sharing of Deer by Communities in or near the NECCUA 1984 – 2016 (ADF&G 2023b).

Community	Study Year	Community Population	Percent Attempting to Harvest	Percent Harvesting Deer	Percent Giving Deer	Percent Receiving Deer	Percent Using Deer	Estimated Total Deer Harvested	Harvest per Household (lbs.)	Harvest per Person (lbs.)	Deer Rank in Contribution to Subsistence
Hoonah	1985	895	59%	52%	38%	54%	86%	584	167	52	1 <sup>st</sup>
	1987	700	n/a	65%	46%	48%	94%	786	287	90	2 <sup>nd</sup>
	1996	891	60%	56%	39%	31%	74%	829	237	74	2 <sup>nd</sup>
	2012	732	59%	48%	40%	45%	77%	470	134	51	3 <sup>rd</sup>
	2016	736	63%	55%	48%	55%	94%	560	93	33	4 <sup>th</sup>
Gustavus	1987	152	n/a	48%	27%	32%	70%	122	151	64	2 <sup>nd</sup>
Game Creek	1996	64	50%	33%	33%	100%	100%	32	173	41	2 <sup>nd</sup>
Tenakee Springs	1984	94	50%	50%	42%	58%	83%	76	130	65	2 <sup>nd</sup>
	1987	95	n/a	55%	39%	45%	87%	160	288	135	1 <sup>st</sup>
Whitestone Camp	1996	142	71%	71%	4%	13%	83%	101	197	57	2 <sup>nd</sup>

Before logging roads were constructed, Hoonah residents accessed deer hunting areas almost exclusively by foot or boat, and hunting by non-locals was limited (OSM 2022b). After 1980, the newly constructed logging roads became the main means of accessing deer hunting locations (OSM 2022b). The Hoonah road system quickly gained the reputation of being a relatively inexpensive, productive, and easy place to hunt deer for both locals and non-locals (OSM 2022b). NFQUs from larger communities now regularly utilize the Alaska State ferry to bring their trucks, three-wheelers, and other recreational vehicles over to Hoonah to facilitate deer hunting along this road system (SERAC 2010, 2021a, 2021b). Competition from NFQUs has become an increasingly significant issue along these roads now, as the extensive road system allows hunters to access some beaches and many other preferred hunting areas by road, making a boat unnecessary (Schroeder and Kookesh 1990, SERAC 2010, 2021a, 2021b).



**Figure 4.** Reported deer hunting locations used by residents of Hoonah in 2012 (Ream and Sill 2017).

Some area residents assert that past logging operations and over-harvest are still limiting quality deer habitat in and around Hoonah (OSM 2022b, SERAC 2010, 2021a). Now, when it snows, deer are left with no place to go, precipitating higher than normal over-winter mortality (OSM 2022b, SERAC 2010, 2021a). While clear-cut areas initially provided good browse for deer, making Hoonah popular with non-local hunters, dense regeneration has now become difficult for deer to pass through and does not supply as much browse (OSM 2022b, SERAC 2010, 2021a). This issue is negatively impacting deer populations in some parts of the NECCUA (SERAC 2010, 2021a).

Changing, less predictable weather patterns are also affecting local deer populations and associated hunting strategies. During periods of heavy snowfall, deer typically move to the beaches and forest fringe to seek food. In 2012, however, Hoonah residents reported changing weather patterns (Ream and Sill 2017). One resident noted that, “Whereas twenty 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” (Ream and Sill 2017: 198). This issue was noted again at a Southeast Council meeting in 2021 when a resident explained, “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” (SERAC 2021a: 339). More traditional beach hunting methods may not be as favorable under these changing weather conditions.

The rising cost of fuel for boats and vehicles has also impacted the hunting strategies of Hoonah residents. As Ream and Sill (2017: 193) note, each of the comprehensive subsistence studies conducted in Hoonah included a mapping component. Although the mapping methods varied between studies, they display a reduction in the size and extent of the areas used by Hoonah residents for subsistence hunting and gathering activities since 1996. These reductions in the size and extent of the areas used by Hoonah residents for subsistence activities generally correspond to the downturn in the regional fishing economy and rising fuel prices witnessed since the 1990s. They may also be associated with the impacts of increasing enforcement of subsistence harvest restrictions in Glacier Bay National Park:

In 1985 and 1987, survey respondents were asked to map all the areas ever used for hunting, fishing, and gathering resources while living in the community. In 1996, respondents were asked to map all the general areas used for hunting, fishing, and gathering resources in the last 5 years. For the 2012 survey, respondents were asked to map the areas they hunted, fished, or gathered resources during the study year only. Despite these differences, the maps provide insight on changing harvest areas over time. In general, the area used by Hoonah residents to harvest wild resources has contracted greatly since 1985, though it has not been a steady contraction. In 1996, residents used a much larger area for harvesting than in 1985 or 1987. The major contraction of harvest and use areas has occurred since 1996. By 2012, search and harvest areas resembled the 1987 areas more closely, though 2012 showed a more reduced search and harvest area ... The changes seen by mapping resource search and harvest areas may reflect social, economic, and regulatory factors. 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 [and money] (Ream and Sill 2017: 193).

One Hoonah resident told ADF&G researchers in 2012, “With current economic conditions and high fuel prices, it is very important to be efficient when going out to harvest. It’s too expensive to not bring back a harvest” (Ream and Sill 2017: 198). Some Hoonah community members and residents of other Unit 4 communities cannot afford to hunt outside of their local, core subsistence area. As one Southeast Council member noted, “They can’t afford to go anywhere [else] because it’s just too expensive, that’s not really subsistence, you’re spending everything that you have to try to get anywhere, and it just doesn’t make sense” (SERAC 2021a: 389).

A recent study of eight rural Alaskan communities in the Yukon Flats region quantified the significant impacts of rising fuel costs and depressed local economies among subsistence harvesters in greater detail (Brinkman et al. 2014). Overall, 81% of the subsistence harvesters participating in the study noted that they had reduced the distance they traveled to conduct subsistence activities over the past ten years because of gasoline costs (Brinkman et al. 2014). Similarly, 89% of the study participants noted that they had reduced the number of yearly trips they took to conduct subsistence activities for the same reason (Brinkman et al. 2014). As the researchers explained:

During the last ten years [2002 – 2012], the median distance traveled to perform subsistence decreased by 60%, and the median number of annual trips taken to perform subsistence decreased by 75%. The change in subsistence activity was similar across and within communities. Eighty-five percent of the people interviewed reported that they were making sacrifices with serious consequences, such as putting off paying monthly bills, to buy gasoline for subsistence activities. To adapt to high gasoline prices, most [study] participants said that they were using more efficient modes of transportation (69%), followed by more sharing of gasoline costs with family and friends (37%), and conducting more multipurpose subsistence trips (20%). With subsistence practices being critical to food security and cultural identity...our results suggest that unaffordable fuel has threatened social resilience [in this area] (Brinkman et al 2014: 18).

Consequently, the reductions in deer hunting efforts and harvests reported by Hoonah residents during the most recent five-year reporting period are at least partially due to the impacts of rising gas prices and declining local economies in this area (see **Table 9**). Recent declines in local commercial fishing industries and generalized inflation in the price of store-bought food and other goods have led some Hoonah residents to reiterate concerns over food security, and the necessity of efficiently harvesting wild resources to offset the high costs associated with living in small, rural Alaskan communities (Ream and Sill 2017, SERAC 2010, 2021b). Residents note that increasing hunter competition and user conflict over access to favored hunting locations close to home is impacting local peoples' ability to harvest sufficient subsistence resources (SERAC 2010, 2021b).

#### Increasing Competition for Deer in the Proposal Area

Unit 4 has very few road-accessible hunting areas outside of the Northeast Chichagof Controlled Use Area (Bethune 2022a). Approximately 80% of all recent deer harvests in Unit 4 have been made by boat-based hunters (Bethune 2022a). The proposal area may be a particularly popular destination for non-local hunters because it is accessible via the ferry system, and it offers the opportunity to hunt along the road or by boat. Perhaps accordingly, reports of increasing hunter competition and localized depletions of deer have been common in the Hoonah area since the most recent period of logging and road construction began in the 1980s (Schroeder and Kookesh 1990, OSM 2022b). 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 had significantly increased in these areas (Schroeder and Kookesh 1990). Similar concerns were documented in 2009, 2010, 2012, and 2021 (Sill and Koster 2017, SERAC 2009, 2010, 2021a, 2021b). For example, Sill and Koster (2017) noted in 2012, "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. . . . As fuel costs put greater pressure on subsistence hunters to be successful, there were a number of suggestions [by Hoonah residents] for better monitoring of non-local hunters, as well as reducing the number of non-resident and non-local deer hunters in the Hoonah areas” (Sills and Koster 2017: 196). Similarly, competition was the most frequently reported issue of concern for respondents in the preliminary results of a small sample survey (19 respondents) on deer hunting and subsistence issues in the Hoonah area conducted by the Hoonah Indian Association Environmental Programs from 2022 to 2023 (HIA Environmental 2023b). In this survey, competition was noted as having a substantial impact on deer abundance, access to preferred hunting areas, and the general difficulty of hunting in the Hoonah area (HIA Environmental 2023b). Fourteen out of the nineteen suggestions (74%) offered by survey respondents to help address this issue involved efforts to reduce or better monitor competition from non-local hunters in the Hoonah area (HIA Environmental 2023b). Likewise, during the previous wildlife cycle, ninety-five Hoonah community members (representing a total of 269 household members) signed and submitted a petition to OSM that supported reducing the annual deer harvest limit for NFQUs hunting in the Northeast Chichagof Controlled Use Area (NECCUA) to two male deer. This was the regulatory change being proposed under WP22-08 at the time.

At a Southeast Council meeting in 2021, an area resident explained that “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 (SERAC 2021b: 456). A Southeast Council member noted, “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 NFQUs (SERAC 2021b: 458).” Another Council member explained that the extensive road network around Hoonah allows people “to get to coastlines that you don’t have to take a skiff to” (SERAC 2021b: 456). This Council member continued, “Whitestone Harbor experienced really, really high pressure from skiffs and from, what I presume is . . . NFQUs. . . . 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, and during the week too” (SERAC 2021b: 456). Similarly, Southeast Council Member and Hoonah Indian Association President Frank Wright noted that the amount of people coming over on the ferry to hunt deer along the Hoonah road system was having a detrimental impact on local subsistence harvests, and that store-bought food was too expensive to offset this issue (FSB 2023: 436). However, as a member of the public testified, “There are a lot of cabin owners in Freshwater Bay who don’t really compete with the road system hunters from Hoonah, who [proposal WP22-08] would adversely effect. . . . I think this [potential regulation change] is unnecessary for those folks. . . . There’s a lot of deer there. You just have to get out of your truck to go get them.” (SERAC 2021b: 450).

During Federal Subsistence Board deliberations on a similar proposal to reduce NFQU harvest limits in the NECCUA (WP22-08), former Southeast Council member Ian Johnson testified that the proposal was “aimed at addressing the local concern of competition that inhibits opportunities for subsistence. I believe that the issue of competition is directly linked to the continuation of subsistence, and I believe is



subject to establishing a subsistence priority under ANILCA” (FSB 2023: 340). Mr. Johnson continued, explaining that:

As a community directly attached to Juneau through the ferry, we experience high competition on the road system especially during the rut and the core of the hunting season. And being only 40 miles by boat, our coastlines are heavily pressured by non-federally qualified users during the rut. Space is more limited than it looks on a map and there's plenty of testimony to reflect on the effect of one boat in the bay and the ability of others to use that bay. There is a need to ensure that subsistence needs are being met and I do believe that subsistence opportunity is being degraded by competition from non-federally qualified users. You know, as a testament to the amount of competition I'll take note of the 1,107 comments in opposition – each of those is a letter from a hunter who's outside of Hoonah who would like to harvest deer in the north end of Chichagof or the west side of Admiralty...

The proposal has merit. I think that reducing the bag limit would likely result in users looking elsewhere to hunt and that would meet our goal of reducing competition to increase our opportunity for subsistence users. I do think that the dataset supporting the analysis is incomplete particularly around the effect of harvest – or the reporting of harvest and effort. The biological data is scarce, with flights not happening in Hoonah for several years. The alpine flights, I think the last time was 2019. And, however, for both sides community, agency, more data would create a better decision that was more durable down the road.

I acknowledge that there are notable drawbacks to this proposal. I've discussed this proposal with people in my community I've seen division in opinion regarding the proposal regulations. Some see no need for it, they think that getting away from competition is a matter of walking, while others are concerned that a Hoonah family living in urban areas may not be able to hunt as many deer when they return to their families. I've also heard the opposite of that, of members who have families who still accept these proposed changes because of the benefits to Hoonah and the need to take care of our community.

You know, last, this proposal has been mired in a notion of a conservation concern rather than addressing competition. I do not think there's a long-term conservation concern for Sitka black-tailed deer in the Chichagof area, but I do think that they are repressed in the last three years due to moderate winters. I'll note that it doesn't matter to Hoonah if deer populations are healthy in Unit 4, an area comprised of three of the biggest islands in Southeast Alaska, which is the scale of the analysis, it only matters to us if they're healthy in the areas we hunt and the current analysis doesn't do a good job of teasing out a local scale because of lack of data (FSB 2023: 341).

Similarly, some comments received during the Fall 2021 Southeast Council meetings noted that reduced subsistence harvests of deer in the area could stem from localized depletions that ADF&G unit-wide data was too coarse to detect, or from competition and crowding from NFQUs who were displacing local, FQSUs from preferred and traditional hunting areas (SERAC 2021b). Some FQSUs also noted that

hunter effort and harvest reporting data tend to underestimate the amount of hunting activity that actually takes place in an area (SERAC 2021b). Hoonah residents have also explained that localized deer population declines and increased hunting pressure may still be related to the legacy of logging and road construction in the area (SERAC 2021a, 2021b). Together, these issues have exacerbated user conflicts around Hoonah (SERAC 2021a, 2021b). As one Unit 4 resident noted:

I kind of live for deer, and I wasn't able to get any last year. I'm getting too old to climb up to the top of the mountain so, you know, I do rely for them to be on the beaches. Anyway, last year I wasn't able to score any. So, I've been saying that the population, I don't know, it seems to be decreasing if you ask me, and there's more pressure on them all the time (SERAC 2021b: 172).

However, some federally qualified and NFQUs have suggested that deer hunting issues currently being experienced in places like Hoonah stem from local preferences for beach and road accessible hunting (SERAC 2021b). An ageing population of hunters in communities like Hoonah might be more reliant upon beach and low elevation hunts in an otherwise steep and rugged landscape. As one Juneau resident explained, the perception of increased competition leading to localized declines in the Unit 4 deer population may be due to recent mild winters, which resulted in deer being spread-out through the forests rather than concentrated and easily observable on beaches and near roads:

I was out there [in Unit 4] for six weeks last year...and you know, it was cold. It was cold and there wasn't much snow last year. So, if you wanted to get deer, you had to go into the woods. It's as simple as that... So, I thought we were pretty successful... When you did get into the woods and tried to walk around up in there, you were crunching through the little bit of frozen snow that was there...but there was a lot of sign [of deer] ... Very seldom did we run the beaches. I mean that's, to me, not really hunting, but I understand for folks who are a little older... (SERAC 2021b: 174).

As this statement by the Juneau hunter also suggests, hunting for some NFQUs is not just about the efficiency with which one can harvest a deer for food; it is also about the experience and sporting nature of the hunt. Still, for some FQSUs, there are also concerns that non-local hunters impact the success of local hunters in ways that go beyond competition, crowding, and/or localized depletions. Some residents assert that non-local hunters, including hunters primarily seeking bear, often shoot at deer and miss, causing the deer to become more skittish and wary of all hunting presence (SERAC 2021a). As one resident noted, "You used to be able to drive up to a deer, get out of the boat within reasonable range and take the deer. Now, you have to stop 400 or 500 yards away" (SERAC 2021a: 59), and "this is something my dad taught me, his dad taught him, and my mother's father taught me. If you shoot at a deer [and miss], you're never going to see that deer again. That's the nature of deer" (SERAC 2021b: 397).

There is also a local perception that non-local hunters, and particularly unguided hunters, engage in hunting as more of a recreational activity than a way of life (SERAC 2021a). Residents note that they have seen non-local hunters wasting or improperly processing their deer harvests (SERAC 2021a). As

one resident explained, “We run into a problem where people from Juneau come out and then they just take part of the deer and not the whole deer, you know, and I always say, whenever we strip a deer, we always boil...even boil the bones, just for something to eat. So, the subsistence way of life is that way, you know, use as much as possible” (SERAC 2021a: 201). This has been an important ethic for rural communities in Unit 4 where winter food security has been an issue (see Ream and Sill 2017).

Though prey switching among subsistence users has been a recorded method for coping with issues of competition and fluctuations in the availability of primary subsistence resources, a recent study among nineteen rural communities in the Yukon River drainage suggests that such strategies often do not provide substantial compensation for declining harvests of primary subsistence resources (Hansen et al. 2013). The overall utility of such strategies may be complicated by policy restrictions, the increased time and money required to harvest sufficient amounts of secondary resources, and/or simultaneous declines in secondary resources (Hansen et al. 2013). In Hoonah, prey switching strategies are complicated by locally perceived declines in salmon, halibut, herring, Dolly Varden, and marine invertebrates; changing weather patterns making hunting and meat processing generally more difficult, and burdensome Federal and State harvest regulations that make it more difficult to harvest subsistence resources effectively and efficiently (Ream and Sill 2017). Furthermore, deer were the only large land mammal reported harvested by Hoonah households in the 2012 ADF&G subsistence study (Ream and Sill 2017).

As Ream and Sill (2017: 198) noted in the conclusion of the 2012 Hoonah subsistence study, residents increasingly find themselves in difficult situations where they need to work more in both the formal cash economy and the subsistence economy to make ends meet:

There were many comments about the general nature of subsistence. Subsistence is about sharing, but less sharing occurs when households can only harvest enough for themselves. There seems to be less sharing occurring now than there was 30 years ago, probably because resources seem scarcer. Poor opportunities in the cash economy led some respondents to reiterate the necessity of subsistence to offset the high cost of living in Hoonah. It was also noted that many people are stuck between needing to work more to earn money, and also needing more subsistence foods to supplement their income. With less abundant resources, harvesting is harder and takes longer, which affects their work schedules. While subsistence is important to supplement wages, many respondents also pointed out the high cost of participating in subsistence harvesting because of the fuel and equipment needed.

### Food Security and Contemporary Economic Conditions

During the most recently published subsistence study conducted by ADF&G in 2012, approximately 31% of the households in Hoonah were considered to be experiencing low or very low food security (Ream and Sill 2017). The percentage of food insecure households in Hoonah (31%) was roughly two-and-a-half times higher than the average for the state of Alaska (12%), and the nation overall (15%) (Ream and Sill 2017). Hoonah households experiencing low food security (28%) reported reduced quality, variety, or desirability of their diet, whereas Hoonah households experiencing very low food security (3%) reported multiple instances of disrupted eating patterns and reduced food intake (Ream

and Sill 2017). A greater percentage of Hoonah households (45%) identified subsistence foods as the primary source of food insecurity as compared to store-bought foods (Ream and Sill 2017). Significantly, deer was the subsistence resource that Hoonah households (42%) most reported needing more of during this 2012 study (Grant and Sill 2017: 271). Approximately 47% of these households noted that this lack of deer had a “minor impact” on their households, while 30% noted that this lack of deer had a “major impact” on their households, and an additional 19% noted that the impact was “severe” (Grant and Sill 2017: 176). Ninety percent of affected households reported having to use more store-bought food as a result of these issues (Grant and Sill 2017).

Overall, 33% of Hoonah households reported worrying about having enough food, 45% indicated they lacked the resources necessary to get either store-bought or subsistence foods, and 12% reported cutting the size of meals or skipping meals due to food insecurity (Ream and Sill 2017). Food insecure conditions tended to increase during the winter months in Hoonah, with a lack of subsistence foods being the greatest contributor to food insecure conditions (Ream and Sill 2017). These findings underscore the importance of successful deer hunting for FQSUs in the area, as deer have consistently ranked as one of the most important resources in terms of bulk contribution to subsistence in Hoonah and surrounding communities during previous study years (see **Table 5**). The vast majority of deer harvest and hunting effort takes place during October, November, and December in Unit 4, with November being the most heavily hunted month (see **Table 6**). This trend is consistent for both FQSUs and NFQUs (**Table 6**). The ability for FQSUs to hunt in January appears to be useful in times of necessity or opportunistic encounters, but it does not appear to be a preferred hunting period due to the relatively poor condition of deer and the severity of weather typically associated with this time of the season (**Table 6**, SERAC 2023b). As ADF&G notes in their comments on this proposal, January was the least hunted month for Hoonah residents, accounting for approximately 1% of Hoonah residents’ reported hunting days and 3% of their deer harvests from 2013 to 2022.

**Table 6.** Percentage of Unit 4 deer harvest by month and user type, 2000-2019 (ADF&G 2021).

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

In 2020, there were approximately 931 individuals living in 275 households in Hoonah (US Census 2020a). The median age of Hoonah residents was approximately 47 at this time, about ten years older than the median age for all Alaskan residents (US Census 2020a). Hoonah also had a significantly larger proportion of residents 65 and older (20%) when compared to the median figure for the entire state (13%) (US Census 2020a). The median household income in Hoonah was \$64,432 in 2020, approximately \$13,000 less than the median household income for Alaska overall (US Census 2020a). The employment rate in Hoonah was roughly 54%, about 3% lower than the median employment rate across the state (US Census 2020a). The primary employment sectors in Hoonah were Public Administration/Government (18%); Education, Healthcare, and Social Work (17%), Agriculture, Forestry, Fishing, Hunting, and Mining (16%); and Recreation and the Service Industry (16%) (US Census 2020a). The poverty rate for families in Hoonah was approximately 8% in 2020, and about 17%

of Hoonah households qualified for the Supplemental Nutrition Assistance Program (SNAP) (see **Table 7**). This socioeconomic information for Hoonah in 2020 is compared to that of the previous two US Census periods in **Table 7** below.

**Table 7.** Hoonah Socioeconomic Statistics for 2000, 2010, and 2020 (US Census 2000, 2010, 2020a, 2020b)

Year	Population	Median Age	Percent of Population 65+	Median Household Income	Employment Rate	Family Poverty Rate	Households Qualified for SNAP
2000	860	35	8%	\$39,028	48%	14%	n/a
2010	760	46	12%	\$50,511	57%	4%	18%
2020	931	47	20%	\$64,432	54%	8%	17%

### Harvest History

Hunter harvest and effort reporting is another one of the suite of methods that managers use in combination to monitor deer population trends in Unit 4. As Bethune (2020: 15) notes, hunter harvest trends, particularly those observed at larger scales, typically reflect current deer population levels. However, hunter self-reported harvest and effort data should be analyzed cautiously, as reporting rates can be less than ideal (Bethune 2020). This is particularly the case in smaller rural communities where reporting rates are often much lower than elsewhere, sometimes less than 30% (Bethune 2020). During the subsistence study conducted by ADF&G researchers in Hoonah in 2012, “a number of respondents expressed concern for what the survey results would be used for and asked if they would be used to implement new regulations and further limit access to subsistence resources” (Ream and Sill 2017: 198). These types of concerns could also be a reason for low or inaccurate deer harvest reporting in the community. Resource managers typically call hunters to ask about their hunting efforts and harvests in an effort to achieve a 60% reporting rate when response rates are low. However, to account for hunters who do not report, data are proportionally expanded by community size (Bethune 2020). Therefore, “in small communities with low reporting rates, expanded data may be based on the reports of only a handful of hunters, resulting in a good deal of uncertainty about the [accuracy of] expanded data” (Bethune 2020: 16).

Additionally, there are several other reasons why harvest estimates often do not accurately represent the hunting efforts and success rates of residents in small, rural communities. First, residents of rural communities often under-report their harvesting statistics because of differences in their interpretations of survey questions. This is a common phenomenon with survey questions, in which the particular lived experiences of respondents leads them to interpret questions differently than intended. For example, residents have noted that the State harvest reporting system used to measure hunting effort and success may be misleading because subsistence users often only document their successful hunts (SERAC 2021b). As one Unit 4 resident explained, “I question this [harvest success] information. When I complete a deer hunter survey, I only list actual deer harvested, and it is always a one-day hunt. I never list the number of times I hunt without success, and it may be three, four, or five times before I shoot a deer” (SERAC 2021b: 73). Likewise, Hoonah residents have noted that data on harvest success rates are

often different than local peoples' 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" (SERAC 2021b: 456). Though harvest reports and comprehensive subsistence survey data are often some of the only sources of quantitative information available on the harvest and use of wild resources by residents of small rural communities in Alaska, it is important to consider this type of quantitative information holistically, in combination with qualitative testimony of local users' observations and traditional ecological knowledge (SERAC 2021b).

ADF&G harvest data from 2000 through 2021 (ADF&G 2022b) were used to try to gain some understanding of the deer harvest patterns and trends of federally qualified and NFQUs in the portion of northeastern Chichagof Island addressed by the proposal (i.e., the "proposal area"). Likewise, hunter effort was also measured as a function of the overall number of hunters and hunter-days. It should be noted that these measurements of hunter effort do not specifically account for potential confounding factors such as community population change, weather, the price of gas, or hunter competition. Hunter harvest and effort measurements were grouped by Wildlife Analysis Area (WAA), which roughly correspond to major watersheds or other distinct geographic areas (see **Figure 2**). Since effort was calculated by WAA, individual hunters using multiple WAAs in a single regulatory year may have been counted multiple times and over-represented in these calculations.

According to the available data, from 2000 to 2021, approximately 80% of Hoonah residents' reported deer harvests, and 79% of their reported hunting days took place within the WAAs covered by the proposal area (see **Table 8**). The East Side Port Frederick/Game Creek (3523), Hoonah Area (3524), Whitestone Harbor/False Bay Drainages (3551), Freshwater Bay Drainages (3525), and Humpback/Gallagher Creeks (4252) WAAs accounted the vast majority of these harvests and hunting days (**Table 8**). A relatively small amount of hunting and harvest took place in the remaining WAAs within the proposal area (**Table 8**). Hoonah residents also reported minimal hunting and harvest occurring in WAAs located outside the proposal area (**Table 8**). However, the location of about 18% of the total reported harvest and 19% of the hunting days reported by Hoonah residents during this time could not be determined from the information returned and is unknown. It is possible that some of this unknown harvest and harvest effort may have also taken place within the proposal area. Based on the distribution of reported deer harvest and hunting days by Hoonah residents, proximity to Hoonah appears to be a primary factor in selecting hunting locations.

**Table 8.** Distribution of Unit 4 Deer Hunting Effort and Harvest by Hoonah Residents by Wildlife Analysis Area (WAA), 2000-2021 (ADF&G 2022b, ADF&G 2021).

<b>WAAs within Proposal Area</b>	<b>Total Harvest</b>	<b>Days Hunted</b>	<b>Percent Harvest</b>	<b>Percent Days Hunted</b>
3523 EAST SIDE PORT FREDERICK, GAME CREEK	1449	3952	17%	18%
3524 HOONAH AREA	1262	4096	15%	19%
3525 FRESHWATER BAY DRAINAGES	986	2577	12%	12%
3526 NORTH SHORE TENAKEE INLET	13	45	<1%	<1%
3551 WHITESTONE HARBOR, FALSE BAY DRAINAGES	1098	2934	13%	13%
4222 PT. ADOLPHUS, MUD BAY AREA	237	338	3%	2%
4252 HUMPBACK, GALLAGHER CREEKS	1046	2315	12%	11%
4253 NEKA BAY DRAINAGES	755	1121	9%	5%
<b>Total within Proposal Area (Inside NECCUA)</b>	<b>6845</b>	<b>17376</b>	<b>80%</b>	<b>79%</b>
<b>WAAs outside Proposal Area</b>	<b>Total Harvest</b>	<b>Days Hunted</b>	<b>Percent Harvest</b>	<b>Percent Days Hunted</b>
3001 NAKWASINA, NEVA STRAIT AREA	2	5	<1%	<1%
3002 SITKA ROAD SYSTEM	10	12	<1%	<1%
3104 NORTHERN KRUFZOF IS.	18	13	<1%	<1%
3207 CRAWFISH INLETS, NECKAR BAY	3	3	<1%	<1%
3308 KOOK LAKE, SITKOH BAY, FALSE IS.	23	252	<1%	<1%
3314 FISH BAY DRAINAGES	0	17	<1%	<1%
3417 WEST COAST CHICHAGOF	12	9	<1%	<1%
3418 YAKOBI IS.	5	7	<1%	<1%
3420 IDAHO INLET DRAINAGES	32	75	<1%	<1%
3421 PORT ALTHORP, LOWER LISIANSKI, INIAN IS.	8	17	<1%	<1%
3627 CORNER BAY, TRAP BAY	3	5	<1%	<1%
3629 SOUTHERN SHORE TENAKEE INLET	6	3	<1%	<1%
3732 WARM SPRINGS COAST	3	3	<1%	<1%
3836 HAWK INLET, YOUNG BAY DRAINAGES	3	3	<1%	<1%
3939 PYBUS BAY DRAINAGES	8	19	<1%	<1%
4041 WHITEWATER BAY, WILSON COVE	3	6	<1%	<1%
4043 CENTRAL ADMIRALTY LAKES	6	6	<1%	<1%
4044 SHEE-ATIKA DRAINAGES	15	15	<1%	<1%
4055 HOOD BAY, CHAIK BAY DRAINAGES	3	6	<1%	<1%
4150 GRAND IS., OLIVER INLET, STINK CREEK	0	10	<1%	<1%
4256 LEMESURIER, PLEASANT ISLANDS	18	16	<1%	<1%
<b>Total Outside Proposal Area (Outside NECCUA)</b>	<b>181</b>	<b>503</b>	<b>2%</b>	<b>2%</b>
<b>Total (Known Harvest Area)</b>	<b>7026</b>	<b>17879</b>	<b>82%</b>	<b>81%</b>
<b>Unknown Harvest Area</b>	<b>1485</b>	<b>4133</b>	<b>18%</b>	<b>19%</b>

Based on the reported data, an average of approximately 568 users hunted for 2,017 days, harvesting a total of 693 deer within the proposal area each year from 2000 to 2021 (see **Table 9**). However, the total number of hunters, hunter days, and deer harvested in the proposal area by both FQSUs and NFQUs was variable between years (**Table 9**). In most years, FQSUs harvested more deer from the proposal area due to the larger number of hunters present in this group. On average, roughly 55% of all reported hunters utilizing the proposal area each year were FQSUs (**Table 9**). About 77% of these FQSUs were Hoonah residents (**Table 9**). NFQUs accounted for an average of approximately 45% of all reported hunters utilizing the proposal area each year from 2000 – 2021 (**Table 9**). Most of these users came from Juneau (ADF&G 2021).

The available yearly data on hunter days and harvests within the proposal area shows similar trends between 2000 and 2021 (**Table 9**). On average, Hoonah residents were responsible for about 39% of reported hunter days and 45% of reported harvests in the proposal area each year (**Table 9**). Other FQSUs were generally responsible for about 13% of reported hunter days and 15% of reported harvests each year (**Table 9**). NFQUs were responsible for an average of about 48% of reported hunter days and 40% of reported harvests in the proposal area each year (**Table 9**). However, the proportion of NFQU hunter effort and harvest within the proposal area increased fairly substantially over the two most recent reporting periods (2011-2015 & 2016-2020). During the 2016 – 2020 reporting period, NFQUs accounted for an average of 54% of all reported hunters, 67% of all reported hunter days, and 50% of all reported harvests taken from the proposal area.

Overall, NFQUs were the only user group reporting increases in average yearly hunters (+12% or +32 hunters), hunter days (+26% or +232 hunter days), or harvests (+12% or +38 deer) in the proposal area between the 2001-2005 reporting period and the 2016-2020 reporting period (**Table 9**). Perhaps most significantly, the average number of reported NFQU hunter days in the proposal area each year increased by approximately 34% between 2001-2010 (817 days) and 2011-2020 (1,097 days).

Hoonah hunters reported the most substantial declines in average hunters (-44% or -138 hunters), hunter days (-76% or -888 hunter days), and harvests per year (-56% or -295 deer) between these two reporting periods (see **Table 9**). For all user groups and reporting periods, years of declining harvest were generally correlated with declines in reported hunters and hunter days (**Table 9**). This issue complicates the analysis, though there may be numerous contextual factors such as those previously discussed that are not reflected in this data.



**Table 9.** Estimated hunting effort and harvest by user group within the proposal area during recent five-year reporting periods (ADF&G 2021).

Year	Hoonah Hunters	Hoonah Hunter Days	Hoonah Harvests	Other FQSU Hunters	Other FQSU Hunter Days	Other FQSU Harvests	NFQU Hunters	NFQU Hunter Days	NFQU Harvests	Total Hunters	Total Hunter Days	Total Harvests
2000	454	2255	555	81	348	68	318	1066	365	853	3669	988
2001	373	1609	523	92	343	164	238	934	253	703	2886	940
2002	360	1720	604	95	407	145	372	1225	358	827	3352	1107
2003	269	613	437	88	351	161	258	840	393	615	1804	991
2004	243	860	495	46	112	67	259	740	301	548	1712	863
2005	327	1028	570	108	245	222	218	692	241	653	1965	1033
<b>5 Year Average</b>	<b>314</b>	<b>1166</b>	<b>526</b>	<b>86</b>	<b>292</b>	<b>152</b>	<b>269</b>	<b>886</b>	<b>309</b>	<b>669</b>	<b>2344</b>	<b>987</b>
2006	355	1155	444	114	674	161	345	1295	463	814	3124	1068
2007	152	593	90	84	183	46	162	605	39	398	1381	175
2008	193	615	137	49	104	19	184	648	104	426	1367	260
2009	182	544	133	36	116	34	97	398	58	315	1058	225
2010	215	786	220	49	177	93	189	795	152	453	1758	465
<b>5 Year Average</b>	<b>219</b>	<b>739</b>	<b>205</b>	<b>66</b>	<b>251</b>	<b>71</b>	<b>195</b>	<b>748</b>	<b>163</b>	<b>481</b>	<b>1738</b>	<b>439</b>
2011	201	703	239	36	124	71	157	827	182	394	1654	492
2012	219	637	238	31	117	30	251	1056	207	501	1810	475
2013	200	548	232	54	228	77	243	990	270	497	1766	579
2014	224	632	269	55	229	53	286	1206	296	565	2067	618
2015	250	797	307	87	440	157	314	1304	416	651	2541	880
<b>5 Year Average</b>	<b>219</b>	<b>663</b>	<b>257</b>	<b>53</b>	<b>228</b>	<b>78</b>	<b>250</b>	<b>1077</b>	<b>274</b>	<b>522</b>	<b>1968</b>	<b>609</b>
2016	217	366	352	83	366	139	327	1298	403	627	2030	894
2017	180	276	189	70	276	86	312	1213	371	562	1765	646
2018	198	269	270	75	269	111	313	1175	336	586	1713	717
2019	157	219	221	72	219	109	278	958	282	507	1396	612
2020	129	260	120	84	260	139	273	945	343	486	1465	602
<b>5 Year Average</b>	<b>176</b>	<b>278</b>	<b>230</b>	<b>77</b>	<b>278</b>	<b>117</b>	<b>301</b>	<b>1118</b>	<b>347</b>	<b>554</b>	<b>1674</b>	<b>694</b>
2021	183	518	200	76	256	105	246	938	303	505	1712	608
<b>Overall Average</b>	<b>240</b>	<b>790</b>	<b>311</b>	<b>71</b>	<b>266</b>	<b>103</b>	<b>256</b>	<b>961</b>	<b>279</b>	<b>568</b>	<b>2017</b>	<b>693</b>

The proposal area accounted for a relatively substantial amount NFQUs' overall hunting efforts and harvests within Unit 4 between 2000 and 2021 (ADF&G 2021, 2022c). Approximately 19% (5,639 users) of all NFQUs' hunted in the proposal area from 2000 – 2021. NFQUs also spent about 19% (21,146 days) of their hunting days in Unit 4 within the proposal area during this time (ADF&G 2021, 2022c). Likewise, roughly 18% (6,134 deer) of all deer harvested by NFQUs within Unit 4 during this period were taken from the proposal area (ADF&G 2021, 2022c). WAAs 3525 (Freshwater Bay Drainages), 3526 (North Shore Tenakee Inlet), and 3524 (Hoonah Area) were the portions of the proposal area most heavily utilized NFQUs, accounting for over 58% of all NFQU hunting effort and harvest in the proposal area from 2000 – 2021 (ADF&G 2021, 2022c).

### **Other Alternatives Considered**

Harvest limit reduction: The current proposal (WP24-05) responds to critiques of earlier, similar proposals (WP22-08, -10) where proposed harvest limit reductions for NFQUs were not considered sufficient to provide for a meaningful conservation benefit or substantially improve the success rates of FQSU (SERAC 2021b). Recently reported data shows that relatively few NFQUs harvest their full harvest limit in this area (OSM 2022b). A harvest limit reduction that allows for the taking of more than one deer by NFQUs would probably not reduce issues of competition and crowding in and around the proposal area during the proposed closure period.

Reduce extent of closure area and/or period of closure: The current proposal represents the outcome of significant consideration of this option. The proponents note that it is intended to limit the proposed closure area to the WAAs most utilized by Hoonah residents and other nearby communities (**Table 8**). The proposal (WP24-05) also limits the length of the closure to a relatively short period of time considered most important to local subsistence users. At its fall 2023 meeting, The Southeast Council voted to remove WAAs 3526 and 4222 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (SERAC 2023). These reductions in closure size and length could help minimize competition and conflicts between user groups in Hoonah's most heavily utilized deer hunting areas, while displacing fewer NFQUs. However, there may still be other portions of the proposed closure area that are not as essential to local subsistence deer hunting efforts. It may be worth considering further reducing the size of the proposed closure area, particularly in light of another current proposal (WP24-06) seeking to close a portion of northwest Chichagof Island to NFQUs during the same time period.

Working Group: One alternative considered during previous deliberations on similar proposals was to establish a Unit 4 deer working group. This suggestion was mentioned by some Southeast Council members and public testifiers during the fall 2021 Southeast Council meeting (OSM 2022a). Developing a "Unit 4 deer management strategy," was also recommended multiple times during the fall 2021 Southeast Council meeting (OSM 2022a). It was suggested that this alternative would allow consideration of deer harvest and hunter competition issues in Unit 4 on a more holistic and longer timescale. It would also enable all alternatives to be considered and could help bring user groups together for discussion and compromise.

Since this time, a “North Unit 4 Deer Working Group” has been established under the guidance of the Hoonah Indian Association Environmental Programs (HIA Environmental 2023a). The first meeting of this group was held on March 15, 2023. The stated goals for the group are to:

Complete annual community surveys on deer harvest and use by training people in the communities to do the work; (2) Understand if/how competition is impacting subsistence use of deer on north Chichagof; (3) Collect deer data through camera traps in overwintering areas to begin to get trend data for deer numbers; (4) Host meetings where managers, community members, and non-community members can discuss their deer harvest needs; and (5) Increase community understanding of how harvest reporting is used in management with the goal of increasing community reporting (HIA Environmental 2023a).

Preliminary information from HIA subsistence surveys and the deer working group has been integrated into this analysis.

### **Effects of the Proposal**

The proponents have asserted that the continuation of subsistence and meaningful rural priority is under threat from increasing competition from NFQUs in and around Hoonah. If the Board adopts this proposal, it will restrict NFQUs from hunting deer within the NECCUA on northeastern Chichagof Island from November 1-15. This could potentially provide federally qualified users in the area with an enhanced subsistence harvest opportunity, by reducing user competition and conflict during a period of peak hunter effort and harvest that is particularly important for a community that faces winter food security issues. The proponents have noted that competition can significantly restrict access and overall hunting success at favored deer hunting sites located along the road system. November is the month when the greatest amount of federally qualified and non-federally qualified hunter effort and harvest has taken place within Unit 4 in recent years. Weather conditions are typically favorable for hunting and meat processing, deer provide the highest quality and amount of meat, and deer are generally more susceptible to harvest during this time.

Adopting the proposed closure could lead to increased harvest effort by NFQUs before and after the closure period. The proposed closure could also lead to increased hunting pressure and user conflicts along beaches, as areas below the high tide line are State-managed lands. The proponents, however, note that beach hunting generally takes place above the high tide line in this area. The proposal will prevent NFQUs with local ties to the area from directly participating in deer hunting during the period of closure, but they may help in other ways such as with meat processing. Some people from Hoonah and other rural areas move to Juneau for employment but often return to these communities to participate in subsistence harvesting with family and friends.

While deliberating similar proposals (WP22-07, -08, -09/10) during the previous wildlife cycle, some Southeast Council members expressed concern over the potential displacement of NFQUs to other areas of Unit 4 if these types of proposals were to be adopted. These Council members were particularly concerned about potential displacement creating similar problems elsewhere if all three deer proposals (WP22-07, -08, and -10) under consideration at the time were to be adopted (SERAC 2021b). This issue

remains a concern with the current proposal (WP24-05) and a similar proposal (WP24-06) to close an area of northwestern Chichagof Island to NFQUs during the same time-period.

## **OSM PRELIMINARY CONCLUSION**

### **Oppose WP24-05**

#### **Justification**

Deer have been and continue to be very important to local subsistence livelihoods and ways of life for FQSUs living in the Hoonah area. Many area residents have noted that they have had to change their deer hunting methods to focus their efforts closer to home, as it has become too expensive and dangerous to travel further without the necessary fuel or equipment. Residents have noted that recently increasing numbers of NFQUs utilizing the Hoonah road system and/or anchoring boats in narrow embayments to hunt for deer are increasing issues of competition and user conflict in the area. Residents of Hoonah and similar communities have also noted that deer populations within Unit 4 may not be tracked at a fine enough scale to consistently capture localized depletions that exacerbate issues of competition and user conflict. Residents have also explained that hunter effort and harvest reporting tend to underestimate the amount of hunting effort taking place, and overestimate hunting success rates. There is data presented in this analysis that supports these arguments, suggesting that rates of competition for deer in the proposal area in recent years may be impacting the success and efficiency of residents of the Hoonah area who have had to focus their deer hunting efforts closer to home.

However, it is still not clear that the current levels of competition created by NFQUs in the proposal area pose the type of threat to the continuation of subsistence that would justify a closure to non-federally qualified users. There may be a better compromise available to address the proponents' concerns without enacting a closure to non-federally qualified users. Though Hoonah residents' deer harvests have generally declined over the past twenty-two years analyzed for this proposal, these declining harvests have typically been associated with declines in reported hunting effort that cannot always be explained by associated declines in the community's population. Despite the noteworthy limitations in the hunter harvest and effort reporting framework, this issue complicates the analysis. More information is required to better understand local hunter harvest reporting practices and the potential relationships between declining economies, rising fuel costs, local hunter effort, the residual impacts of logging, and increasing rates of competition from NFQUs in the proposal area.

Overall, the Office of Subsistence Management feels that more information is still needed from a greater sample of the local population to determine whether a closure to NFQUs is necessary, and exactly where that closure should be located. OSM hopes to receive this type of information through additional meetings of the Southeast Council and the North Unit 4 Deer Working Group.

## ANALYSIS ADDENDUM

### OSM CONCLUSION

**Support WP24-05 with modification** to remove Wildlife Analysis Areas 4222, 4252, 4253, and 3526 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (see **Figure 5**). The modified regulation should read:

#### Unit 4 - Deer

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

*Aug. 1 – Jan. 31*

***Federal Public lands of the Northeast Chichagof Controlled Use Area south of Port Frederick, draining into the waters of Chatham Strait between Point Augusta and East Point, including Freshwater Bay, are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.***

### Justification

Deer have been and continue to be very important to local subsistence livelihoods and ways of life for FQSUs living in the Hoonah area. Deer have consistently ranked as a key resource in terms of bulk contribution to subsistence diets in Hoonah during previous studies conducted by ADF&G researchers. However, reports of substantial hunter competition and localized depletions of deer have been common in the Hoonah area since the most recent period of logging and road construction took place in the mid-1980s. Per capita deer harvests by Hoonah residents have also been in decline since the 1990s. Hoonah households reported substantial levels of food insecurity during the most recent subsistence study conducted by ADF&G, and deer were the subsistence resource that Hoonah households most reported needing more of during this study. Reported simultaneous declines in other key subsistence resources, changing weather patterns, economic declines coupled with rising fuel prices, and policy restrictions make it difficult to effectively compensate for the impacts of high levels of competition for deer in the proposal area.

There is qualitative and quantitative data that supports residents' claim that competition with non-locals has been threatening the continuation of subsistence uses of deer, and that a limited closure to non-federally qualified users is necessary to continue these uses per §815(3) of ANILCA. First, Hoonah residents have noted that because of declines in the commercial fishing industry and associated economic issues, they have had to change their deer hunting methods to focus their efforts closer to home, as it has become too expensive and/or dangerous to travel further without the necessary fuel or equipment. This issue has also been documented in the most recently reported subsistence study conducted by ADF&G researchers in Hoonah. Residents have noted that the high numbers of NFQUs utilizing the Hoonah road system and/or anchoring boats in narrow embayments to hunt deer are causing competition issues and user conflicts in the area. Local knowledge attests to the fact that the Hoonah road system becomes overcrowded during the period surrounding the rut, and that this crowding can

substantially impact residents' ability to hunt effectively and efficiently during a key period for subsistence harvesting.

Second, residents have also noted localized depletions of deer within the core subsistence harvesting area around Hoonah, and that deer populations within Unit 4 may not be tracked at a fine enough scale to consistently capture the impacts of this issue. Third, residents have further explained that their recent difficulties in harvesting deer are not well represented in the quantitative data collected on deer harvests and hunter effort. They note that hunter effort and harvest reporting tend to underestimate the amount of hunting effort taking place, and overestimate hunting success rates. Residents have also voiced concerns about how resource harvest data might be used by Federal and State agencies in ways that could further complicate and restrict their subsistence harvesting activities. These types of concerns may be limiting the harvest reporting rates of Hoonah residents, as well as their overall involvement in Federal and State subsistence programs. Still, the quantitative data presented in this analysis shows that rates of competition for deer in the proposal area are very high based on NFQU hunter days and that the average number NFQU hunter days in the proposal area per year increased substantially during the 2011 to 2020 period. This amount of competition appears to be impacting the success and efficiency of Hoonah residents who have had to focus their deer hunting efforts closer to home.

The OSM modification would increase subsistence harvest opportunity for FQSUs in the Hoonah area by allowing for a ten-day period where residents could hunt in their most heavily utilized areas closest to home, during a very important time in the local deer harvest season, without potential competition from NFQUs. The OSM modification reduces the size of the proposed closure area to focus on the WAAs (3523, 3524, 3525, and 3551) along the road system in and around Hoonah. These are the areas closest to home that are most heavily utilized by residents, as shown in the hunter harvest and effort data in Table 9, and the deer hunting locations reported to ADF&G researchers in Figure 4.

Under the OSM modification, NFQUs would maintain the ability to hunt within the entire section of the NECCUA north of Port Frederick (WAAs 4222, 4252, and 4253), as well as the North Shore Tenakee area (WAA 3526) during the proposed ten-day closure. Excluding WAA 3526 from the proposed closure area seems appropriate since it is one of the deer hunting locations most heavily utilized by NFQUs, but accounts for less than 1% of Hoonah residents' recent harvests and days hunted in the NECCUA (see Table 9). Similarly, excluding WAAs 4222, 4252, and 4253 would reduce the area of the closure, and thereby reduce the impact of the closure on NFQUs. These WAAs (4222, 4252, and 4253) also do not appear to be as essential to Hoonah residents' deer hunting efforts as those areas along the road system in and around Hoonah (see Table 9 and Figure 4).

This modification is expected to have some limited impacts on NFQUs. While 19% of all NFQUs hunting deer in Unit 4 hunted within the proposed closure area, the short duration of the closure and reduced size of the closure area under this modification should mitigate these effects. However, this level of recent NFQU hunter effort within the NECCUA also demonstrates the extremely high rates of competition experienced by FQSUs in the proposal area and the disproportionate benefits this closure could have for FQSUs. As previously reported by ADF&G researchers, Hoonah residents have been

experiencing high rates of food insecurity, in large part due to the increasing difficulty of acquiring subsistence foods under conditions of intense competition and crowding from NFQUs in and around Hoonah.





**Figure 5.** OSM Modified Proposal Area in relation to Hoonah, Gustavus, and Wildlife Analysis Areas on Chichagof Island (For Informational Purposes Only).

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## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

### Southeast Alaska Subsistence Regional Advisory Council Recommendation

**Support** WP24-05 **with modification** to remove Wildlife Analysis Areas 4222 and 3526 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (see **Figure 6**). The Council felt this action was necessary to support the continuation of subsistence uses in this area, while also causing the least possible impact to non-federally qualified users. The Council felt that supporting the proposal with modification would provide a more meaningful subsistence preference by reducing competition during a key time for subsistence deer hunting, and thereby improve Hoonah residents' ability to access deer and meet their subsistence needs efficiently and economically in a context where economic declines have forced residents to focus their hunting strategies much closer to home.

OSM's interpretation of the Council's intent is:

#### Unit 4 - Deer

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

*Aug. 1 – Jan. 31*

***Federal public lands of the Northeast Chichagof Controlled Use area draining into the waters of Icy Strait east of Point Adolphus, including Port Frederick; and the waters of Chatham Strait south of Point Augustus and north of East Point, including Freshwater Bay are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.***



**Figure 6.** Southeast Council's Modified Proposal Area in relation to Hoonah, Gustavus, and Wildlife Analysis Areas on Chichagof Island (For Informational Purposes Only).

### **INTERAGENCY STAFF COMMITTEE COMMENTS**

The ISC acknowledges the extensive effort made by the Southeast Alaska Subsistence Regional Advisory Council (Council) during both the 2022-2024 and the 2024-2026 Wildlife Regulatory Cycles to help federally qualified subsistence users meet their subsistence needs for deer in the Hoonah area.

Deer populations in Unit 4 are the highest in the state and closures are not needed for conservation reasons. The Council's justification for submitting WP24-05 focuses on the closure being necessary to continue subsistence uses due to competition and user conflict in the areas closer to Hoonah. While reported harvest success by federally qualified subsistence users appears stable over the last decade based on quantitative harvest data, federally qualified subsistence users in the area report these data underestimate hunter effort and do not capture competition that affects their ability to harvest enough deer to meet their subsistence needs.

The ISC recognizes the effort that the Council has put into providing a meaningful subsistence priority, while trying to reduce restrictions on non-federally qualified users as much as possible. Since submission of their first proposal for the 2022 regulatory cycle, the Council reduced the duration of their requested restriction to limit non-federally qualified users to two bucks for the entire season, to a 15-day closure, to the current Council recommendation of closing for 10 days at the beginning of November and reduced the requested closure area to those areas closest to home and most utilized by Hoonah residents.



## ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

### Alaska Department of Fish and Game Comments

#### Wildlife Proposal WP24-05

This proposal would close federal public land within the Northeast Chichagof Controlled Use Area (NECCUA) to deer hunting by non-federally qualified users (NFQU) from November 1–November 15 (Figure 1).



Figure 1. Map of the NECCUA proposal area and boundaries of the ADF&G Wildlife Analysis Areas for deer hunter data used to analyze effects of the proposal.

#### Position

The Alaska Department of Fish and Game (ADF&G) **OPPOSES** this proposal because there are no justifications under the Alaska National Interest Lands Conservation Act (ANILCA) for the Federal Subsistence Board (FSB) to approve this closure. If enacted, it would unnecessarily deprive NFQUs of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA. In *Alaska v. Federal Subsistence Bd.*, 544 F.3d 1089, 1100 (9<sup>th</sup> Cir. 2008), the Ninth Circuit ruled that, under ANILCA, the Federal Subsistence Board (FSB) may regulate subsistence use but is prohibited from limiting nonsubsistence use. A reduction in NFQU opportunity for hunting deer in GMU 4 is inconsistent with ANILCA under applicable case law on federal preemption." Section 815 of ANILCA authorizes federal restrictions on



nonsubsistence uses on the public land only if “necessary for the conservation of healthy populations of fish and wildlife” or if necessary to “continue subsistence uses.” Based on the following analysis of the only annually collected, objective, and quantifiable data available, none of those reasons apply. There is no conservation concern for the Chichagof/Yakobi Island deer population, and none of the harvest data collected remotely suggests FQUs are having any issues harvesting deer. In fact, several indices indicate deer remain abundant in the area affected by the proposal and local hunters are highly efficient at harvesting deer. Given this evidence there is no need to restrict harvest to conserve the population.

The stated purpose of the proposal is to “establish a meaningful preference for the continuation of subsistence use of deer”, however, the proponents provide no “substantial evidence”, as required by Section 815(c)(1), in support of claims that the NFQUs hunting in this area inhibits harvest by federally qualified subsistence users (FQU), and data provided by FQUs residing in Hoonah clearly indicate that the decline in harvest by that community results from declining participation and effort by Hoonah hunters. We note that FQUs in Hoonah already enjoy several meaningful preferences including an extra month of hunting opportunity in January, a liberal designated hunter program where any FQU can hunt on behalf of another FQU, and living close to the resource, which allows FQUs to hunt whenever conditions are favorable. We also note that Huna Totem and Sealaska shareholders already have exclusive hunting opportunity on the substantial Alaska Native Claims Settlement Act (ANCSA) corporation land near Hoonah. In contrast, NFQUs from Juneau are limited by the Alaska Marine Highway schedule and vehicle capacity of the small ferry that serves Hoonah. NFQUs accessing the NECCUA by boat from Juneau need to travel a minimum of 40 miles to Whitestone Bay or 60 miles to Hoonah during a time of year with short days and often unfavorable weather. NFQUs have a more restrictive bag limit of 3 deer east of Port Frederick and non-resident hunters (non-Alaskan residents) have a more restrictive bag limit of two bucks. Further, we could find no reference in Title VIII of ANILCA to the term “meaningful preference.” Nor could we find justification for limiting NFQUs based on safety concerns, economics of FQUs, or the potential of altering deer behavior due to poor NFQU marksmanship. We conclude there is no lawful justification for adopting this proposal and it should be rejected under Section 805(c)(1).

Another reason listed in support of the proposal was concern for public safety. Public safety is addressed in §816 (b), but only in reference to temporary closures of public land to *subsistence uses* for reasons of public safety. We believe that provision was intended to address unusual circumstances, not lawful hunting, particularly when hunting pressure has been declining for years. Closing public land to NFQUs while leaving them open for FQUs would be a misuse of §816 (b).

ADF&G would note that this proposal is almost identical to the one (WP22-08) that was considered by the Federal Subsistence Board at their meeting Jan. 31-Feb. 3, 2023, where they voted 7-1 to oppose adopting these restrictions to NFQUs. They found that this restriction did not meet the requirements under ANILCA.

*“...As the Staff analysis also has pointed out, Section .815(3) of ANILCA states that the Board may only restrict non-subsistence uses on Federal public lands if it's necessary for*

*the conservation of healthy populations of fish and wildlife, to continue subsistence uses of such populations or for health and human safety reasons. The existing deer population and harvest survey data clearly shows the deer population in Unit 4 has remained stable, it's considered the highest in the state and currently there are no conservation concerns. Subsistence users have been able to continue to harvest deer at approximately the same level for the past 10 or 20 years and the amount of time it takes for a Federally-qualified users to harvest deer has not changed. In summary, the proposed regulation change does not meet the criteria for a closure or restriction to non-subsistence use."*

To date, neither the population nor harvest levels have diminished from when the FSB took this up at the beginning of 2023. The rationale still applies and none of the requirements laid out in ANILCA have been met for this restriction to be put in place. The proponents would have you believe that is not the case and that "competition" is impeding FQU harvest success. However, we know from public testimony that this means that the very presence of NFQUs is an unacceptable level of competition. During public meetings statements were made by proponents that, "I'll call it competition, or just the presence from other hunters" and "...going to a favorite spot and, you know, seeing another boat there. It doesn't matter whether they're successful hunters or not, it's just the fact that they're there..." Nowhere in ANILCA does it empower the FSB to enact restrictions on NFQUs based solely on their mere presence in an area.

There has been a clear lack of support for this proposal from the community of Hoonah. Thirty-seven comments were received by OSM regarding this proposal with only one in support. This mirrors the lack of support received for WP22-08 which was rejected by the FSB one year ago. Between the extended public process, the FSB gave to WP22-08 combined with the process for WP24-04 one would imagine if this was an issue of such import more people would've submitted supportive comments.

### **Background**


This proposal has the same general goal and justification as WP22-08, which the Federal Subsistence Board overwhelmingly rejected at their January 2023 meeting. The current proposal states that federally qualified users from Hoonah are having trouble meeting their subsistence needs for deer because of competition and user conflicts with non-federally qualified users. The proposal asserts that "flocks" of NFQUs overcrowd the northeast Chichagof Island (NECH) road system with campers, trailers, and tents which inhibit FQU access, substantially increases competition for deer, and causes hunting safety concerns. The proposal also claims that NFQUs may diminish the success of FQUs if they shoot at and miss deer by altering the deer's behavior. For these reasons the proposal maintains that FQU hunting success is reduced, and continuation of subsistence use of deer is hindered. To mitigate these concerns and to establish a "meaningful preference" for the continuation of subsistence uses of deer, the proposal asks the Federal Subsistence Board (FSB) to close federal public land within the NECCUA (Figure 1) to NFQUs hunting deer from November 1 – November 15.

Game Management Unit (GMU) 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. All residents of Southeast Alaska (GMUs 1-5) excluding residents of Juneau and Ketchikan are eligible to harvest deer in GMU 4 under federal

subsistence regulations. The current federal deer season for this area is August 1 – January 31 with a bag limit of six deer (bucks only August 1 – September 14). The current state resident season east of Port Frederick and north of Tenakee Inlet is August 1 – December 31 with a bag limit of three deer (bucks only August 1 – September 14). The current state season for the remainder of GMU 4 including the NECCUA west of Port Frederick is August 1 to December 31 with a bag limit of six deer for Alaska residents (bucks only August 1 – September 14). In 2023, the Alaska Board of Game (BOG) reduced the bag limit for non-resident deer hunters throughout GMU 4 including northeast Chichagof Island from six deer to two bucks. That change was made not because of conservation concerns, but to reflect actual use patterns more accurately and to mitigate the perception that nonresident hunters compete with resident hunters.

NECH east of Port Frederick and north of Tenakee Inlet is managed differently than the remainder of Unit 4 for several reasons. Most of GMU 4 is federal public land with limited logging and much of the land is in conservation status. In contrast, there are substantial private land on NECH owned by Alaska Native Claims Settlement Act (ANSCA) corporations. Federal subsistence regulations do not apply on private land, but the owners can close them to public access. A large portion of the NECCUA west of Port Frederick is also private ANSCA corporation land.

These comments analyze indices of deer abundance, deer hunter effort, and harvest in GMU 4. Deer abundance trends are derived from annual deer pellet group transects, aerial alpine surveys, and spring mortality surveys. Hunter effort and harvest data are derived from the annual deer hunter survey (1997 – 2010), and mandatory deer harvest ticket reports (2011 – present). Collectively, these data gathered by the Alaska Department of Fish and Game (ADF&G) are the only annually collected, objective, and quantitative information on deer abundance, hunter effort, and harvest available for Southeast Alaska.

 mention HIA projects here?

### Analysis

#### GMU 4-Wide Population Status

Because Monitoring deer abundance in forested habitat is challenging, deer cannot be directly counted like other species in more open habitat. ADF&G uses several types of survey data to monitor trends in the population. Since the 1980's ADF&G has used spring pellet group counts to monitor broad ( $\geq 30\%$ ) changes in deer abundance. ADF&G discontinued pellet surveys in Southeast Alaska after 2019, but historical survey results show that GMU 4 consistently had the highest pellet group counts in Southeast Alaska (Figure 2). Pellet group counts  $< 1.0$  groups/plot generally correspond to low density populations, 1.0 – 1.99 groups/plot to moderately dense populations and  $> 2.0$  groups/plot correspond to high density populations. Pellet group counts in GMU 4 are usually well above the high-density threshold and are often double the counts in other GMUs. The most recent survey near the proposal area was in 2019 in Pavlof Harbor near Freshwater Bay where biologists recorded 2.47 groups/plot. This broad index of deer abundance indicates that GMU 4 supports the highest deer populations in Southeast Alaska.

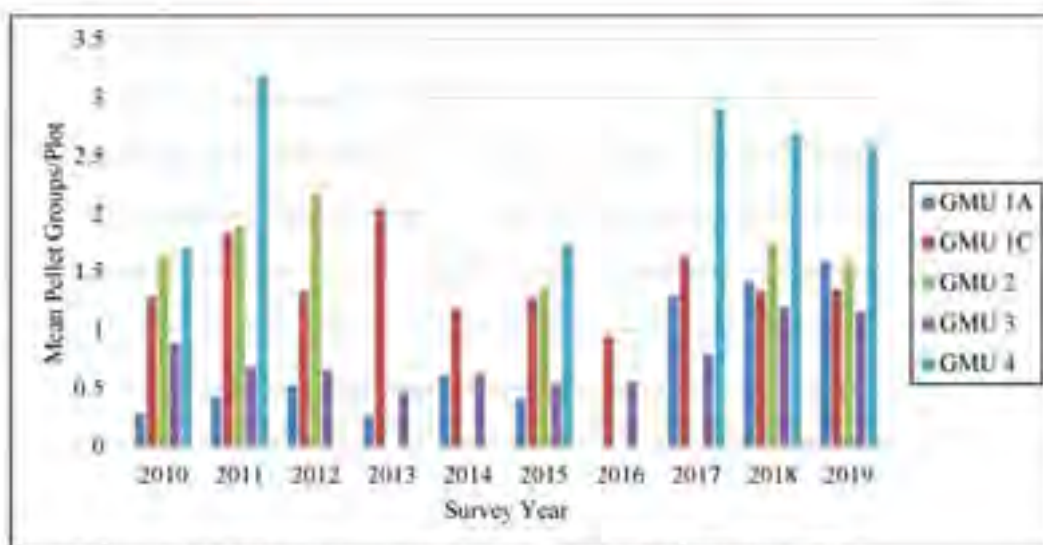


Figure 2. Mean number of deer pellets groups/plot for Southeast Alaska by GMU, 2010 – 2019.

In 2013, ADF&G began evaluating mid-summer aerial counts of deer in alpine habitats as an index of deer abundance. Surveys were conducted for two locations in GMU 4, Southern Admiralty Island (2015 – 2017) and Northeast Chichagof Island (2017-2018). The findings of those surveys were summarized as deer counted per hour of survey time (Figure 3). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska. NECH ranked third with only Admiralty Island and central Prince of Wales Island having higher counts.

In July 2023 ADF&G conducted two minimum count aerial surveys of alpine habitat on NECH, one on the same route flown 2017 and 2018, south of Freshwater Bay and Game Creek, and another on a new route north of Freshwater Bay and Game Creek that also included alpine habitat on the west side of Port Frederick northeast of the Neka Bay and Mud Bay drainages (Figure 4). The southern survey route yielded a count of 79 deer/hour, which was similar to previous counts indicating a stable deer population in that area. The new northern survey route covered alpine habitat on land more readily accessible from the Hoonah and Westport Road systems (west side of Port Frederick). On that route ADF&G counted 131 deer/hour with similar counts east and west of Port Frederick. Those counts are comparable to other highly productive deer habitat on central Prince of Wales Island and southern Admiralty Island. These surveys suggest deer are abundant along the Hoonah road system.



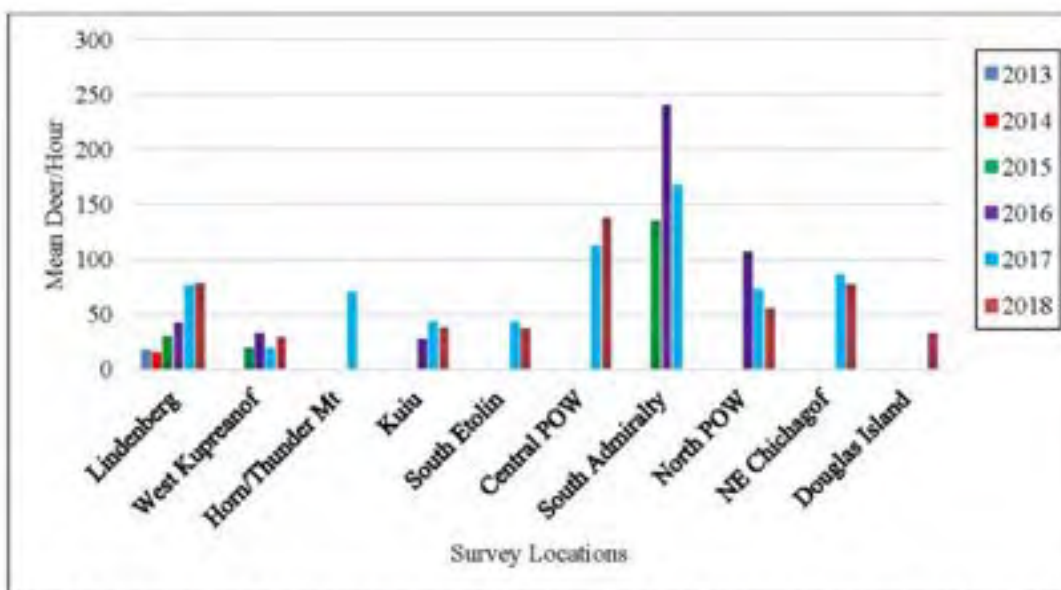


Figure 3. Mean number of deer counted per hour during mid-summer aerial alpine deer surveys in Southeast Alaska, 2013 – 2018.



Figure 4. August 21-22, 2023, aerial alpine deer survey routes.

ADF&G biologists in GMU 4 began conducting beach mortality transects in the early 1990s. These surveys are an indicator of over-winter mortality resulting from severe winter conditions which is the most limiting factor for Sitka black-tailed deer populations in GMU 4. In addition to the total count of carcasses per mile, the proportion of buck, doe and fawn mortalities also indicates winter severity. Usually fawns die first, followed by adult males and then adult females. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Note the high number of carcasses found during spring 2007 surveys (Figure 5). In the years since then, few carcasses were found indicating high over-winter survival and no significant population declines related to winter severity. In the spring of 2022, ADF&G made a concerted effort to conduct mortality surveys throughout GMU 4. This was partly due to early snows in December 2021 and in response to federal proposals to limit hunting by NFQU. Two surveys were conducted on NE Chichagof Island (Freshwater Bay and Whitestone Harbor). Biologists counted zero mortalities/mile on these surveys, lower than the overall GMU 4 count. Survey results for 2023 were among the lowest on record with 0.08 mortalities/mile. Biologists also observed high numbers of deer including a high percentage of short yearlings during spring 2023 surveys which corroborate survey results.



Figure 5. Mean number of winter-killed deer per mile of beach surveyed in GMU 4.

Taken together, these indices of deer abundance (pellet surveys, alpine counts, mortality transects) indicate that the overall GMU 4 deer population is high and stable, particularly on federal public land. Aerial counts flown in late July 2023 found deer to be particularly abundant in alpine habitat along the Hoonah road system, and none of these indices suggests a decline in deer abundance or a conservation concern for the GMU 4 population. Based on observations of browsing levels, biologists think deer populations in some areas of GMU 4 may be at or near carrying capacity. Management biologists plan to recommend hunters include does in their Unit 4 bag limit for RY23.

In summer 2023, the Hoonah Indian Association in consultation with ADF&G began a deer population monitoring program using remote game cameras. If that project employs a robust sampling and analytical approach, it could provide future insight into deer abundance in the proposal area.

#### Trends in GMU 4 Hunter Effort and Harvest

ADF&G biologists also use harvest as an indicator of trend in the deer population. Harvest data reported by hunters allow ADF&G to monitor harvest by specific communities and by geographic units known as Wildlife Analysis Areas (WAAs). ADF&G estimates hunter effort and harvest using information provided by hunters including hunters from Hoonah. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Prior to 2011, ADF&G mailed survey forms to one third of the hunters in each community who obtained harvest tickets. Since 2011, harvest tickets have come with a mandatory reporting requirement. People who obtain harvest tickets are required to report whether they (or a proxy or federal designated hunter) hunted or not. Those who did hunt are required to report where they hunted, days of hunting effort, and information about the deer they harvested.

From 1997 – 2022 the estimated average annual harvest in GMU 4 was 5,605 deer taken by 3,253 hunters (Figure 6). Currently GMU 4 supports the highest deer harvest in the state with harvest remaining stable with between 5,000 – 7,000 deer annually. The biggest exception being the severe winter of 2006/2007 when high harvest was followed by a significant over-winter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,734 deer in RY06 to 1,933 deer in RY07. Based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

More recently, hunter participation and harvest data reported to ADF&G for RY22 (fall 2022) indicated substantial declines in both the number of hunters and deer harvested in GMU 4. When fewer people hunt, fewer deer are harvested, but the decline in the number of people who obtained harvest tickets and reported hunting in GMU 4 was unexpected, particularly when deer remain abundant.

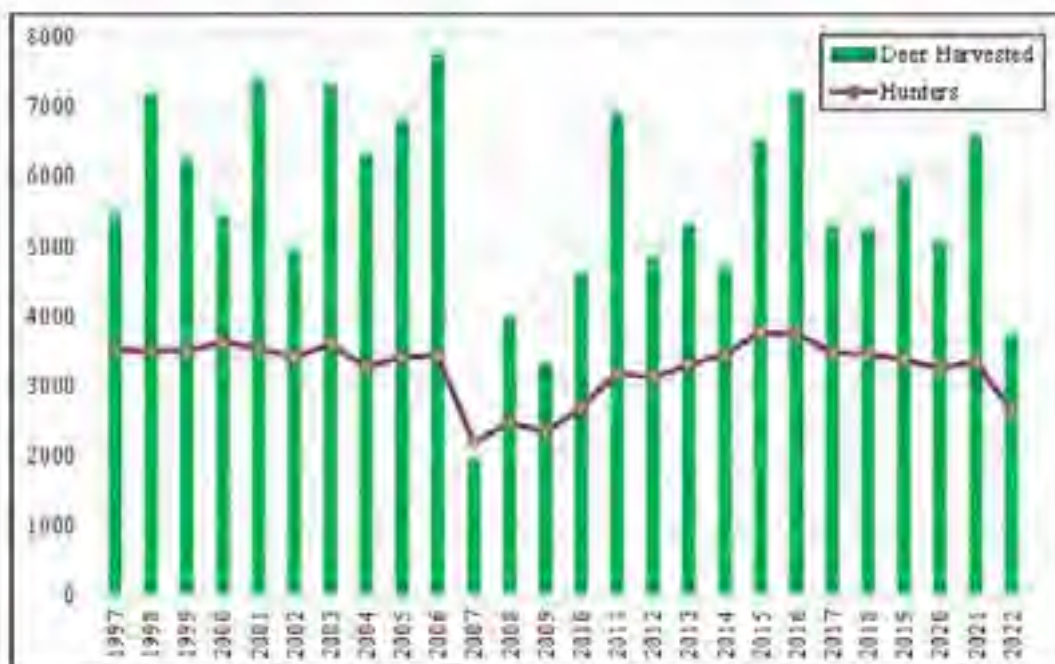


Figure 6. Number of people hunting deer and estimated deer harvest for GMU 4, RY97 – RY22.

#### Trends in Hunting Effort and Harvest for Hoonah Residents

The proposal asserts that Hoonah residents are having trouble meeting their subsistence needs for several reasons, including competition and user conflict with NFQUs. Although the proposal targets the NECCUA, any deer taken by Hoonah residents would be considered part of their subsistence take, so we investigated harvest by Hoonah residents for all GMU 4 and for only the NECCUA. We found that over 90% of deer hunting effort and harvest by Hoonah residents occurs within the NECCUA, so data summaries for all GMU 4 and for only the NECCUA are essentially the same. Here we present data reported by Hoonah hunters for all GMU 4.

The winter of 2006-07 was the most severe on record and resulted in mortality of an estimated 75% of deer in the NECCUA. The years following that winter saw sharp declines in hunter effort and deer harvest followed by gradual recovery. ADF&G considered the NECCUA deer population fully recovered by RY13, but that period appears to have coincided with long-term changes in participation, effort, and harvest by Hoonah deer hunters. We use two 10-year comparison periods before and after the record winter of 2006-07 to illustrate those changes. The first period is from RY97 to RY06, and the second period is from RY13 to RY22.

Long-term records indicate a declining trend in deer harvest by Hoonah residents (Figure 7). From RY97 to RY06 Hoonah residents harvested an average of 582 deer annually in GMU 4. Harvest declined to a low of 119 deer in RY07 because of the severe winter of 2006/2007. During the RY07 to RY12 seasons, State and federal managers restricted the take of does within the NECCUA to help the deer population recover. Harvest gradually recovered until RY16 but



has been declining since then. From RY13 to RY22 harvest by Hoonah residents has averaged 319 deer annually, an approximate 45% decline from the comparison period.



Figure 7. Total number deer harvested in GMU 4 by Hoonah residents, RY97 – RY22

To evaluate potential reasons for this decline in deer harvest we examined trends in the number of Hoonah hunters and days of hunting effort by those hunters. Since 1997, the number of Hoonah hunters has followed a similar pattern as harvest (Figure 8). From RY97 to RY06 an average of 243 hunters participated each season. The severe winter of 2006/2007 resulted in a decline in the deer population and hunting activity for several years. By 2013, ADF&G considered the deer population fully recovered. However, from RY13 to RY22 an average of only 187 Hoonah residents reported hunting deer in GMU 4, a 23% decline from the earlier period.

The number of Hoonah residents who obtained harvest tickets corroborates the decline in Hoonah residents who reported hunting. To hunt deer or have someone hunt deer for you under the state proxy or the federal designated hunter programs, individuals are required to obtain harvest tickets. In Hoonah there has been a declining trend in the number of residents who obtain deer harvest tickets (Figure 9), and that decline mirrors the decline in the number of people who report hunting. Between RY97 and RY06, an average of 390 individuals obtained deer harvest tickets with a high of 422 in RY01. Since RY13, that number has dropped to an average of 315 individuals, a 19% decline, with as few as 222 in RY22. It is interesting to note that the number of deer hunters in Hoonah has been declining despite US Census findings that since 2000 the population of Hoonah has grown by 8%.

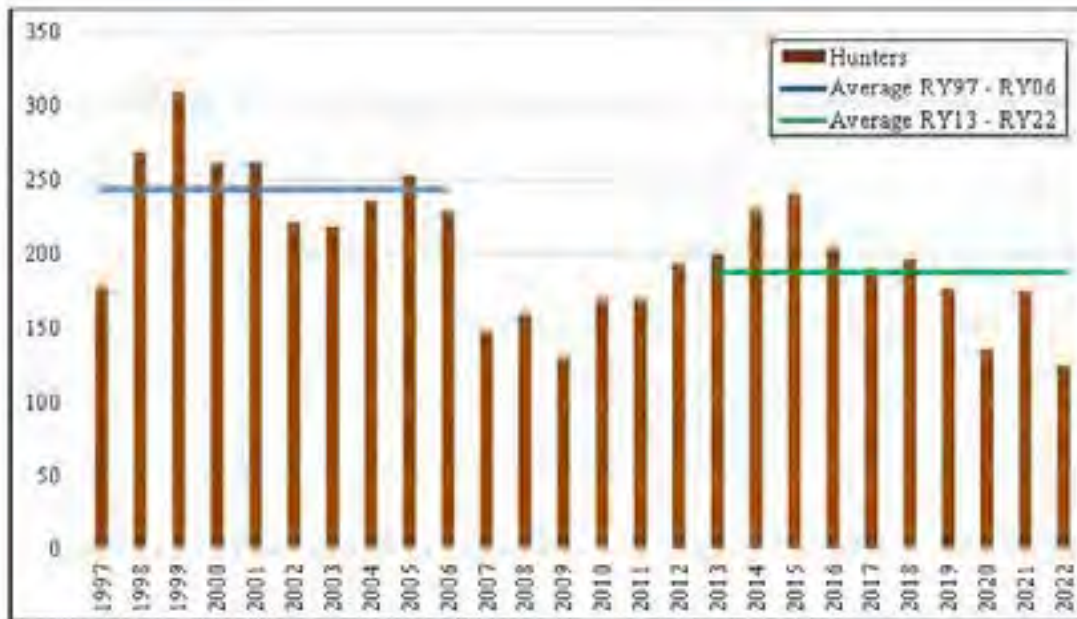


Figure 8. Number of Hoonah residents who reported hunting deer in GMU 4, RY97 – RY22.

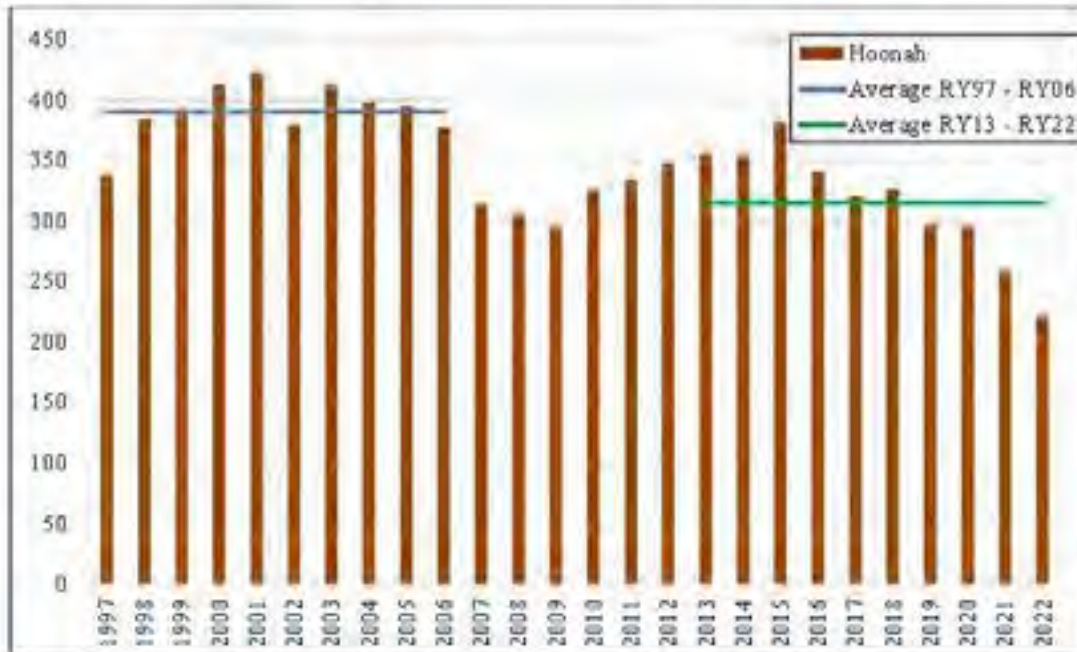


Figure 9. Total number of Hoonah residents who obtained deer harvest tickets, RY97 – RY22.

The decline in the number of Hoonah-based hunters doesn't fully explain the decrease in reported deer harvest, so we also examined hunting effort. In the decade prior to the 2006/2007

winter (RY97 – RY06), Hoonah residents reported hunting an average of 1,480 days annually or 6.1 days per hunter. Since RY13, Hoonah hunters report spending a total of only 682 days afield annually or 3.6 days per hunter (Figure 10). That is a 54% decline in the number of days of hunting effort by Hoonah residents. The continued high abundance of deer along with declining hunter participation and effort data reported to ADF&G by Hoonah residents clearly indicate that the decline in the Hoonah deer harvest is a function of fewer hunters expending less effort.

Another factor that could explain the decrease in harvest and participation by Hoonah residents is that much of the private ANSCA Corporation land near Hoonah was clearcut and is now in or entering the stem exclusion phase. For many years post-logging Hoonah residents have taken advantage of young clear-cuts for hunting. These close-to-home hunting grounds were easily accessed via logging roads, had high deer abundance due to increased forage availability, and deer were more readily visible than in forest. Now, these private lands, which were closed to non-shareholders and provided excellent exclusive deer hunting for shareholders, are virtually unhuntable due to very dense regenerating forest and low abundance and visibility of deer. This requires Hoonah residents to drive longer distances to United States Forest Service land where they have a more reasonable expectation of encountering deer but must also share public land with non-shareholders. The proposed closure would not apply to private corporation land.

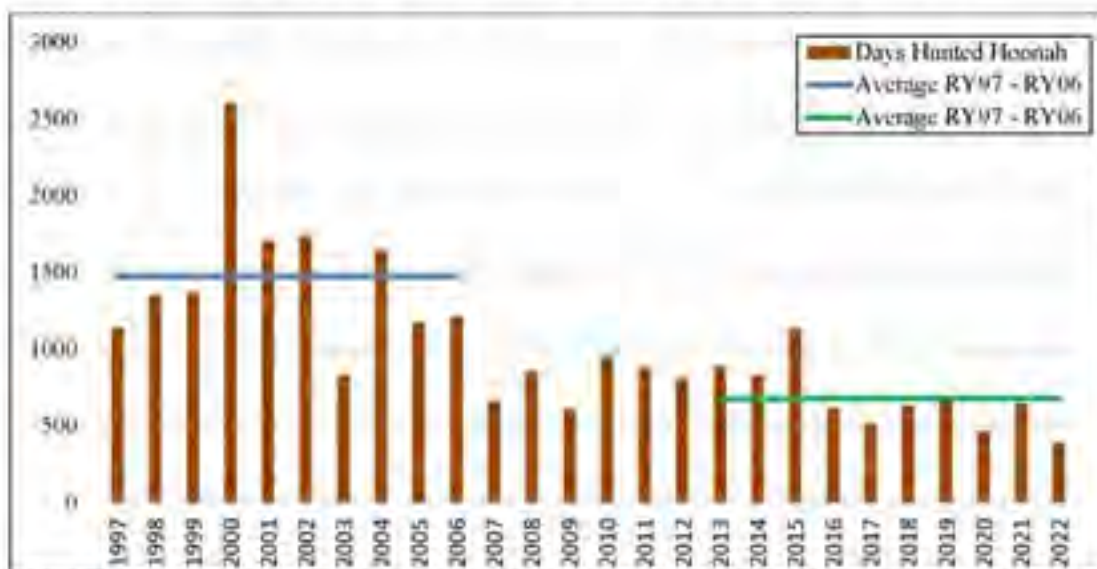


Figure 10. Days hunted by Hoonah residents in GMU 4, RY97 – RY22.

#### Trends in Hoonah Hunter Efficiency

Hunter efficiency, or the days of hunting effort required to harvest one deer, is an indicator of the ability of hunters to meet their subsistence needs, and the proposal specifically notes the need for FQUs to be efficient in their hunting. Long-term trends indicate that Hoonah residents have historically been very efficient at harvesting deer. That has not changed. Between RY97 and RY06, Hoonah residents reported that they needed an average of 2.5 days of hunting effort to harvest each deer. Since RY13, Hoonah residents have reported needing only 2.1 days of effort



to harvest a deer. According to their own reports Hoonah hunter efficiency has actually improved over the last decade, and Hoonah residents in general are experiencing extremely efficient deer hunting. These data reported by Hoonah hunters directly contradict the assertion that Hoonah residents are having trouble meeting their subsistence needs due to competition from NFQU hunters. If competition was resulting in reduced FQU hunting success, we would expect to see an increase in the days of effort required for Hoonah hunters to harvest a deer and a corresponding increase in the number of non-Hoonah hunters using the area, but the data show the opposite to be true.

Compared to deer hunter effort required to harvest a deer in other GMUs, Hoonah residents are extremely efficient. In comparison, hunters on Prince of Wales Island (GMU 2) average 4.1 days of hunting effort per deer harvested. Cordova (GMU 6D) averages 2.9 days/deer. Kodiak (GMU 8) averages 3.7 days/deer, GMU 1A (Ketchikan area) averages 4.6 days/deer, GMU 3 (Petersburg/Wrangell) averages 5.9 days/deer, and in GMU 1C (Juneau area) hunters average 7.9 days/deer (ADF&G 2013 – 2022). The average effort across GMU 4 required to harvest one deer is 2.4 days. The effort required by Hoonah residents to harvest one deer in GMU 4 is lower than the average effort needed to harvest one deer in any GMU across the state including the GMU 4 average. (Figure 11).



Figure 11. Average hunting days required to harvest one deer in Southeast Alaska, RY13-RY22.

While deer harvest by Hoonah residents has declined, population indices indicate that the deer population is at high levels (except on ANSCA corporation land) and hunter efficiency is as good or better than it has been historically. The only conclusion supported by the data is that declining harvest by Hoonah deer hunters is a result of declining hunter participation and effort.

#### Hoonah Harvest in the Proposal Area (Majors X35 and X42)

We examined harvest and hunter effort for the proposal area to quantify potential effects of competition and to quantify the importance of the proposal area for meeting the subsistence needs of Hoonah residents. Because we believe it is unlikely that Hoonah residents differentiate between NFQUs and FQUs not based in Hoonah (i.e., residents of Haines, Gustavus, Skagway,

Sitka, etc.) we also summarized harvest data for non-Hoonah FQUs. The proposed closure would not affect non-Hoonah FQUs.

We found that Hoonah residents hunt almost exclusively within the NECCUA. Well over 90% of all the hunters, days hunted, and deer harvested within GMU 4 come from the proposal area. Because nearly all deer hunting effort and harvest by Hoonah residents take place within the proposal area, GMU 4-wide trends for Hoonah residents in Figures 6 – 10 also depict trends in the proposal area. Clearly the NECCUA is important for Hoonah deer hunters.

The trend for total NFQUs hunting in the NECCUA is similar to the pattern for Hoonah residents (Figure 12). NFQU numbers plummeted following the devastating winter of 2006/2007, rebuilt for a few years and now appear to be declining. The overall trend has been a slight decline between the two comparison periods. From RY97 to RY06 an average of 337 NFQUs hunted the NECCUA. Since RY13, the average number of NFQUs hunting this area has dropped by 10% to 303. However, in the last four years (RY19-RY22) an average of only 272 NFQUs hunted in the NECCUA.

The number of non-Hoonah FQUs hunting also shows a consistent downward trend (Figure 13). Between RY97 and RY06 an average of 139 non-Hoonah FQUs hunted the NECCUA annually. Since RY13, that average has dropped by 35% to 91 hunters annually. The combined number of NFQU and non-Hoonah FQU hunters (the competition for Hoonah resident hunters) has declined by 20% from an average of 476 hunters (RY97 – RY06) to an average of 395 (RY13 – RY22). Contrary to assertions in the proposal, Hoonah hunters in the NECCUA are experiencing declining competition from outside hunters. Further, the total number of deer hunters (Hoonah residents, non-Hoonah FQU, and NFQU) hunting in the NECCUA is trending downward.

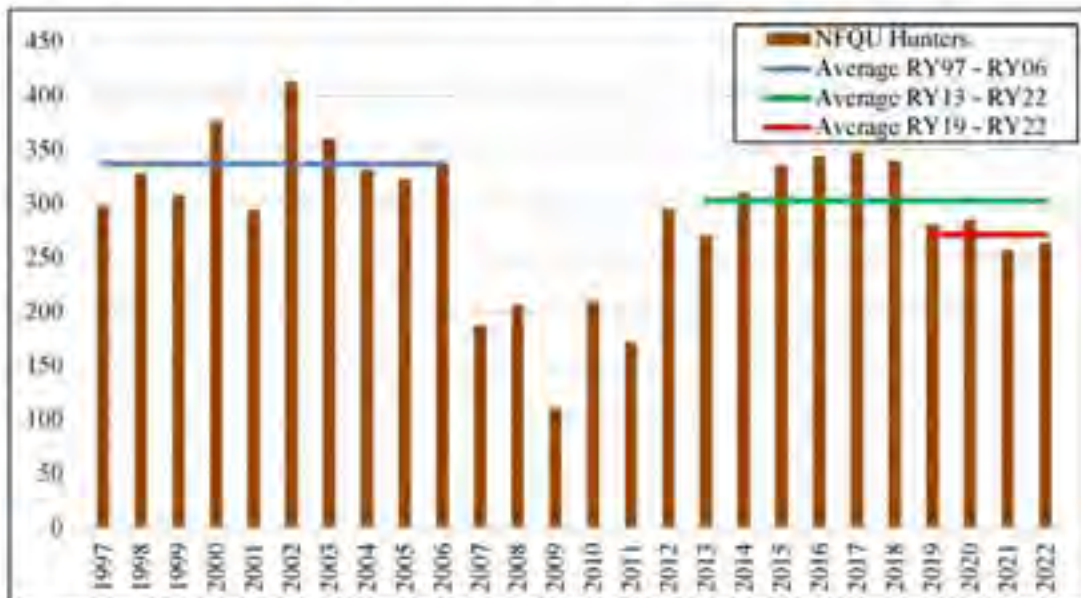


Figure 12. Number of NFQUs hunting deer in the NECCUA, RY97 – RY22.

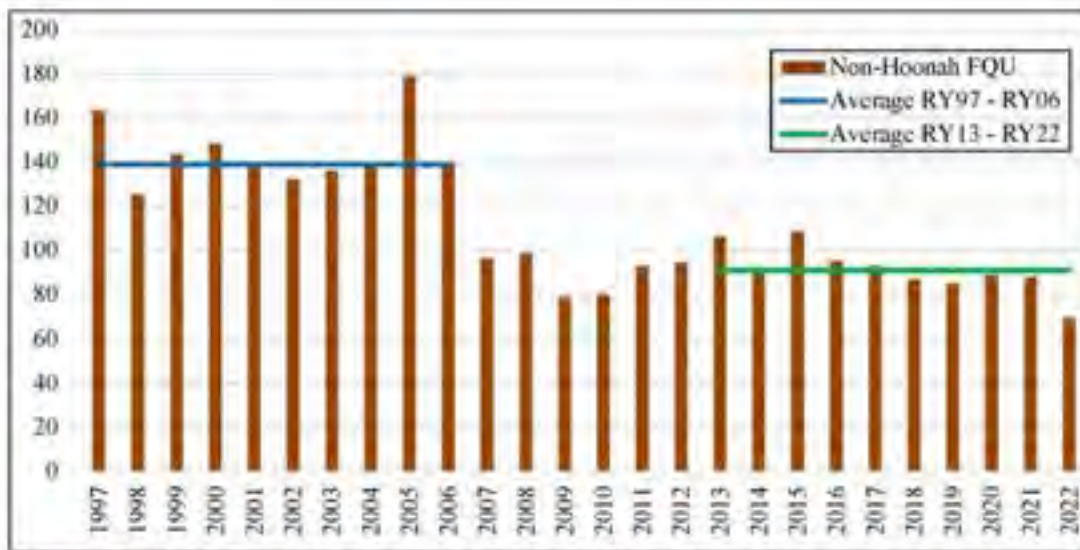


Figure 13. Number of non-Hoonah FQUs hunting deer in the NECCUA, RY97 – RY22.

Trends in the number of days of hunting effort by NFQUs (Figure 14) and non-Hoonah FQUs (Figure 15) mirror trends in the number of hunters in each group. Between the comparison periods (RY97 – RY06 and RY13 – RY22) average annual days of hunting effort by NFQUs declined slightly from 1,257 days afield to 1,203 days afield. Days of hunting effort by non-Hoonah FQUs declined from an average of 527 hunter days to an average of only 353 hunter days. This represents an approximate 13% decline in the combined number of hunting days by hunters who do not reside in Hoonah. The annual number of days of hunter effort by all NECCUA user groups (NFQUs, non-Hoonah FQUs, and Hoonah residents) is declining.



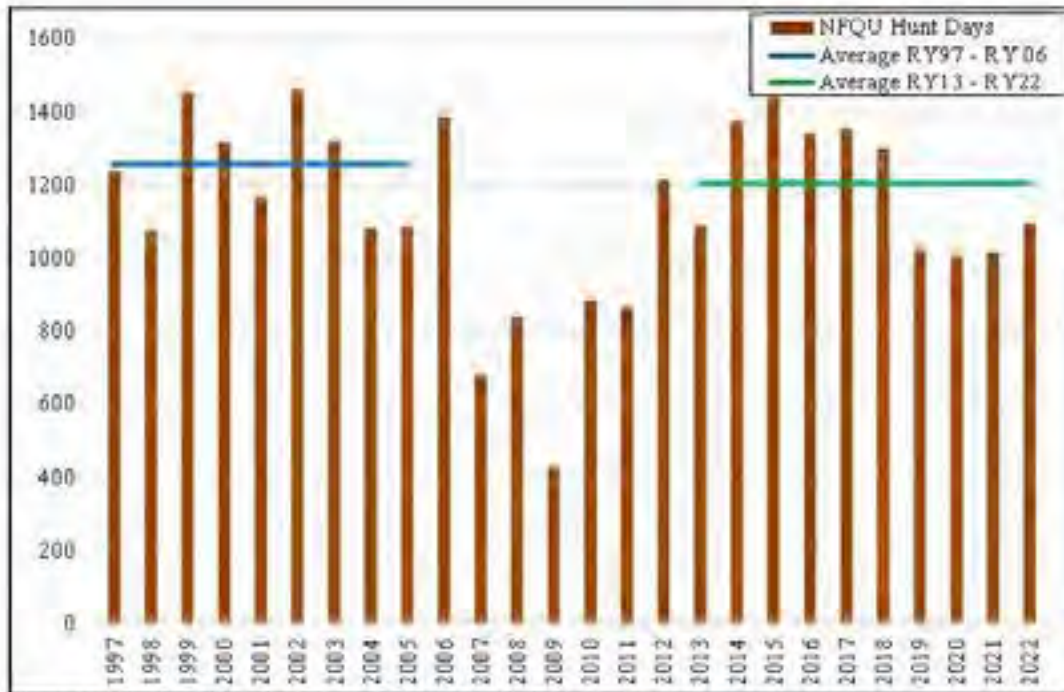


Figure 14 Number of NFQU hunting days in the NECCUA, RY97 – RY22



Figure 15 Number of non-Hoonah FQU Hunt days in the NECCUA, RY97 – RY22

The number of deer harvested in the NECCUA is also declining for all user groups. Declines for Hoonah hunters are depicted in Figure 6. From RY97-RY06 NFQUs harvested an average of 421

deer. Harvest declined to fewer than 50 deer in 2007 and then steadily increased to pre-RY06 levels by RY15. However, since then harvest by NFQUs has declined, and harvest from RY13-RY22 has averaged 358 deer annually, a 15% decline (Figure 16).

The decline in harvest by non-Hoonah FQUs has been more pronounced (Figure 17). Between RY97 and RY06 harvest averaged 200 deer annually for this user group. Since RY13, when ADF&G considered the deer population recovered from the winter of 2006/2007, non-Hoonah FQU hunters have taken an average of only 123 deer annually, a 39% decline.

Reports submitted to ADF&G by NECCUA deer hunters indicate decreasing levels of competition for Hoonah deer hunters. If competition was limiting Hoonah residents' ability to harvest deer, we would expect to see declining efficiency (more days to harvest a deer) and reduced harvests while maintaining effort (number of hunters and days hunted). At the same time, we would expect to see increasing numbers and days of hunting effort by NFQU and non-Hoonah FQU hunters. However, hunter effort and harvest data reported to ADF&G by hunters including Hoonah residents clearly show that hunter efficiency for Hoonah residents has remained stable or improved while the number of hunters, days of hunting effort, and deer harvested are trending downward for all user groups.

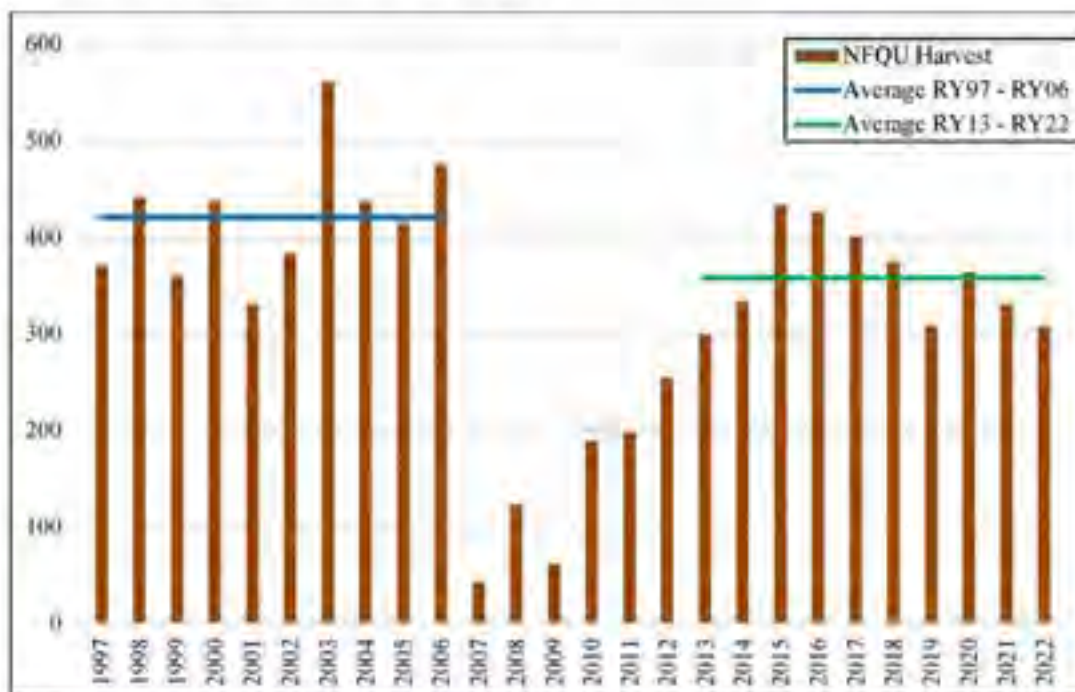


Figure 16. NFQU deer harvested in the NECCUA, RY97 – RY22.



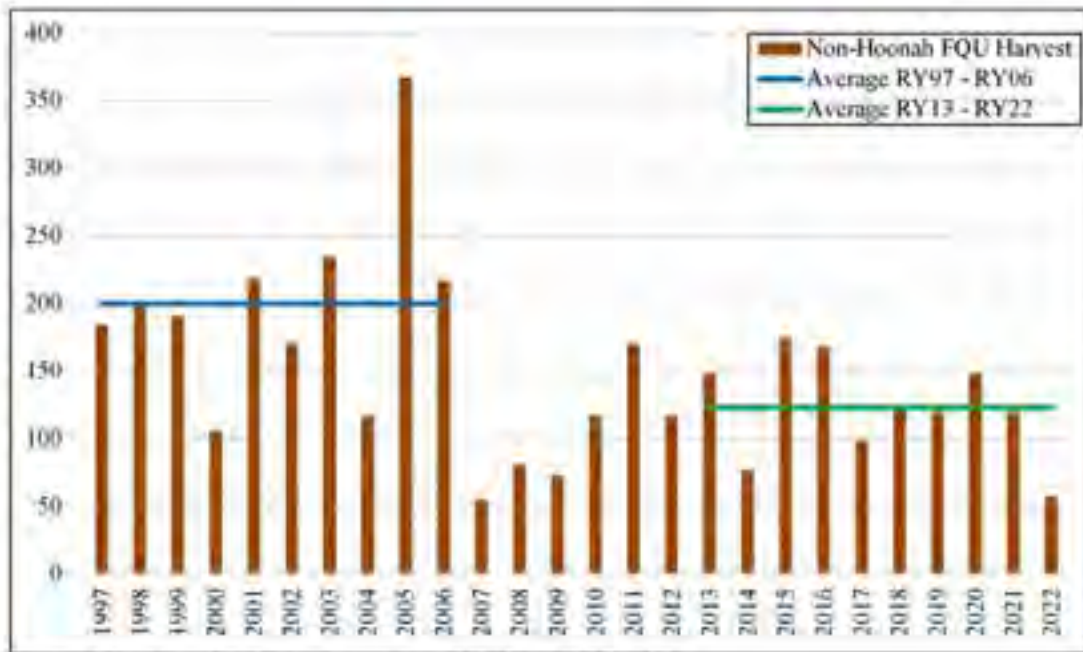


Figure 17. Non-Hoonah FQU deer harvest in the NECCUA, RY97 – RY22.

#### Hunt Chronology

Mid-October through early December is the most popular time for all hunters to pursue deer in GMU 4. Deer activity coinciding with the rut as well as winter snows that push deer to beaches make for more successful hunting than earlier in the season. For all hunters in GMU 4 from RY13 to RY22, November accounts 40% of the hunters, 50% of the hunt days and 44% of the harvest. Hunters report hunting effort and harvest by month, so data can only be summarized by month (Table 1).

Table 1. GMU 4 deer hunting chronology of harvest and effort for all hunters as both numbers and percentage of total, RY13 – RY22.

	Hunters		Days		Deer	
	Hunters	%	Hunted	%	Harvested	%
August	3,907	9	7,339	6	3,054	6
September	4,133	9	8,658	7	3,939	8
October	7,573	16	17,375	14	7,038	14
November	18,667	40	59,428	50	22,865	44
December	10,041	22	23,727	20	12,039	23
January	1,901	4	3,439	3	2,561	5
<b>Total</b>	<b>46,222</b>		<b>119,966</b>		<b>51,496</b>	

We analyzed hunt chronology for only Hoonah residents to determine the importance of the November 1 – 15 period for meeting their subsistence needs. Indeed, November is an important month for hunting by Hoonah residents, but it was not quite as pronounced as when looking at all GMU 4 hunters combined. November accounts for 33% of the hunters, 41% of the days hunted,

and 35% of the harvest by Hoonah residents. Because ADF&G's harvest statistics can only be compiled by month, we are unable to break out the Nov. 1 – 15 period, though a logical assumption would be that it accounts for roughly one-half of the November activity (Table 2).

Table 2. GMU 4 deer hunting chronology of hunter effort and harvest for Hoonah residents as both numbers and percentage of total, RY13 – RY22.

	<u>Hunters</u>		<u>Days</u>		<u>Deer</u>	
		<u>%</u>	<u>Hunted</u>	<u>%</u>	<u>Harvested</u>	<u>%</u>
August	369	12	634	10	323	10
September	397	13	800	12	394	12
October	716	24	1,435	21	781	25
November	1,003	33	2,784	41	1,120	35
December	474	16	1,014	15	476	15
January	60	2	82	1	84	3
<b>Total</b>	<b>3,018</b>		<b>6,749</b>		<b>3,177</b>	

#### Background Summary

We presented ADF&G's deer abundance survey data and deer hunting effort and harvest data provided to ADF&G by GMU 4 hunters including Hoonah residents. To gauge changes in measures of hunter effort and harvest we compared the decade prior to the severe winter of 2006-07 with the decade since 2013 when the deer population was considered recovered. Those comparisons support the following conclusions.

1. Deer remain abundant in the proposal area. Deer pellet group transects, aerial alpine surveys, and late winter mortality surveys all indicate that in GMU 4 deer occur at among the highest densities in the state. Consequently, there is no need to restrict take by NFQUs to either conserve the deer population or to ensure continued subsistence use of the deer population.
2. The total number of hunters and numbers of hunters from each user group (Hoonah residents, other FQUs, and NFQUs) hunting deer in the NECCUA has declined, and data from the last few years indicate that trend is likely to continue. In recent years FQU hunters are also expending considerably less effort, so total hunting pressure in the proposal area is moderate and declining. It is also likely that some of the NFQUs hunting in the proposal area are former Hoonah residents who moved to Juneau for employment or other opportunities but return to hunt with and on behalf of relatives and friends in Hoonah.
3. The average number of Hoonah residents participating in deer hunting each year and the days of hunting effort by those hunters have declined. Between the two comparison periods the average number of Hoonah residents who obtained deer harvest tickets declined by 19%, reported hunting declined by 23%, and **the days of hunting effort reported by Hoonah residents declined by 54%**. That dramatic decline in hunting effort is the reason deer harvest by Hoonah residents has declined, not competition from NFQU hunters.
4. The days of hunting effort Hoonah hunters require to harvest one deer remain very low at 2.1 days of hunting per deer harvested. The proposal emphasizes that subsistence hunters need to be efficient, and this is among the most efficient hunting anywhere in Alaska.

### **Impact on Subsistence Users**

The proposed Nov. 1-15 closure will exclude NFQUs and may reduce the already declining competition between NFQU and FQU hunters on federal public land. However, NFQUs would still be able to hunt adjacent state-owned tidelands below mean high tide, state public uplands, and private property subject to landowner permission. The proposed closure will not reduce competition between Hoonah residents and FQUs from other Southeast communities. If any NFQUs excluded from hunting during the proposed closure have ties to Hoonah and normally share meat with family and friends who reside there, the proposed closure could have the unintended consequence of reducing the amount of deer meat available to Hoonah residents.

### **Impact on Other Users**

Opportunity for NFQU to harvest deer on federal public land within the proposed closure area would be reduced. Since RY13 approximately 300 NFQUs have harvested 350 deer annually in the NECCUA. Applying the percentages of GMU 4 hunters who hunt during November, we estimate that 62 NFQU hunters harvest 79 deer annually within the NECCUA during the proposed closure period. Some NFQU hunters are likely former residents of Hoonah who moved to federally designated non-rural areas for economic, health or education reasons but return to Hoonah to hunt and partake in their traditional subsistence practices.

### **Opportunity Provided by State**

The season and bag limits for deer on Chichagof Island east of Port Frederick and north of Tenakee Inlet are:

	<b><u>Bag Limit</u></b>	<b><u>Open Season</u></b>
Residents	Three deer (bucks only to September 14)	August 1 – December 31
Non-Residents	Two bucks	August 1 – December 31

The season and bag limits for deer in GMU *Remainder* are:

	<b><u>Bag Limit</u></b>	<b><u>Open Season</u></b>
Residents	Six deer (bucks only to September 14)	August 1 – December 31
Non-Residents	Two bucks	August 1 – December 31

**State customary and traditional use findings:** The Alaska Board of Game has made a positive customary and traditional use finding for deer in GMU 4.

**Amounts Reasonably Necessary for Subsistence (ANS):** Alaska state law requires the Board of Game to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests

for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for deer in GMU 4 is 5,200 – 6,000 deer. The ANS was established in 1992.

#### **Conservation Issues**

There are no conservation issues for the deer population in GMU 4. Following a decade of mild winters, the available population indices suggest the GMU 4 deer population remains high and stable. In fact, managers in GMU 4 will be encouraging hunters to include does as part of their RY23 bag limit as deer populations may be at or near carrying capacity in some watersheds. Deer harvest remains within the historical range and state ANS is met in most years. Population indices and measures of hunter effort and success indicate that GMU 4 has the highest population of deer and highest hunting success of anywhere in the state.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters and field observations by ADF&G biologists we conclude that there is no conservation concern for the GMU 4 deer population. The proponent also conceded that there is no conservation concern for GMU 4 deer at the 2022 Federal Subsistence Board meeting.

#### **Enforcement Issues**

Passage of this proposal will create increasingly and unnecessarily complex regulations for NFQUs. Enforcement will be challenging because NFQUs will remain eligible to hunt deer on state-owned tidelands, lands below the line of mean high tide, and on all non-federal uplands. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are harvested above or below that line of mean high tide. Further, brown bear season will still be open in much of the proposal area making it difficult for enforcement officers to tell which species hunters are targeting. Hoonah residents may not be able to differentiate between NFQUs and non-local FQUs, so reports to law enforcement of NFQUs hunting in the proposal area may be in error.

## WRITTEN PUBLIC COMMENTS

7/6/23, 2:02 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Comments on Southeast Proposals

Matuskowitz, Theo TM &lt;theo\_matuskowitz@fws.gov&gt;

Thu 7/6/2023 12:14 PM

To McKinney, Kayla T &lt;kayla\_mckinney@fws.gov&gt;

Theo Matuskowitz  
 Supervisory Regulations Specialist  
 US Fish and Wildlife Service  
 Office of Subsistence Management  
 1011 East Tudor Road, MS 121  
 Anchorage, AK 99503-6199  
 Office: (907) 786-3867  
 Telework: (907) 786-3888  
 FAX (907) 786-3898  
 theo\_matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>

Sent: Thursday, July 6, 2023 8:51 AM

To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Subject: Fw: [EXTERNAL] Comments on Southeast Proposals

Office of Subsistence Management  
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 1011 E Tudor Rd, MS 121  
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From: Ryan Beason <rbeason14@gmail.com>

Sent: Saturday, July 1, 2023 1:46 PM

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

Subject: [EXTERNAL] Comments on Southeast Proposals

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7/5/23, 2:02 PM

Mail - McKinney, Kayla T - Outlook

WP24-04 (Southwest Admiralty)  
WP24-05 (Hoonah Area / NCCUA)  
WP24-06 (Pelican Area / Lisianski Inlet)  
WP24-02  
WP24-03

- Ryan Beason

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7/1/23, 10:52 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

Matuskowitz, Theo TM &lt;theo\_matuskowitz@fws.gov&gt;

Thu 7/6/2023 12:29 PM

To: McKinney, Kayla T &lt;kayla\_mckinney@fws.gov&gt;

Theo Matuskowitz  
 Supervisory Regulations Specialist  
 US Fish and Wildlife Service  
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 1011 East Tudor Road, MS 121  
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 theo\_matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
 Sent: Tuesday, June 27, 2023 1:33 PM  
 To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
 Subject: Fw: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

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From: art dunn <adunn1848@gmail.com>  
 Sent: Sunday, June 25, 2023 5:25 PM  
 To: AK Subsistence, FW7 <subsistence@fws.gov>  
 Subject: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

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7/7/23, 10:52 AM

Mail - McKinney, Kayla T - Outlook

I happen to be a Juneau resident who has hunted in all of the areas described in these proposals. In over 40 years of hunting in these areas I have never seen any conflicts between subsistence and sport hunters that could be characterized as competition. On the other hand, I have witnessed violations of the hunting regulations by subsistence hunters, such as hunting from watercraft, shooting on or across roads, and hunting after dark using spot lights.

I have just finished an overview of 36CFR242 and do not find any mention of competition as a reason to restrict hunting opportunity for non-rural hunters on Federal lands.

Sincerely,  
Arthur C Dunn

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7/6/23, 3:07 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] WP24-04 and WP24-05

Matuskowitz, Theo TM &lt;theo\_matuskowitz@fws.gov&gt;

Thu 7/6/2023 12:14 PM

To: McKinney, Kayla T &lt;kayla\_mckinney@fws.gov&gt;

Theo Matuskowitz  
 Supervisory Regulations Specialist  
 US Fish and Wildlife Service  
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 Office: (907) 786-3862  
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 FAX (907) 786-3898  
 theo\_matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
 Sent: Wednesday, July 5, 2023 8:31 AM  
 To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
 Subject: Fw: [EXTERNAL] WP24-04 and WP24-05

Office of Subsistence Management  
 U.S. Fish and Wildlife Service - R7  
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From: Patrick malecha <patmalecha55@gmail.com>  
 Sent: Friday, June 30, 2023 11:29 PM  
 To: AK Subsistence, FW7 <subsistence@fws.gov>  
 Subject: [EXTERNAL] WP24-04 and WP24-05

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I have not received a response  
 from Theo Matuskowitz

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7/6/23, 3:07 PM

Mail - McKinney, Kayla T - Outlook

Office of Subsistence Management

I am writing in opposition to Proposals WP24-04 and WP24-05 regarding deer hunting closures in the Hoonah and Southwest Admiralty areas. I am an Alaskan who lives in Juneau but am not currently qualified for federal subsistence. I respect the intent of the federal subsistence programs in Alaska but feel these proposals are not necessary. The deer populations in these regions are successfully managed by the Alaska Department of Fish and Game and are currently considered healthy. Further, both of these proposals make unfounded claims regarding Juneau and non-federally qualified hunters without supporting scientific evidence or data.

Please respect that the State of Alaska has management authority for wildlife resources in Alaska and that all Alaskans deserve access to these resources if there is not a valid subsistence hardship. Reject Proposals WP24-04 and WP24-05.

Respectfully,  
Pat Malecha

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJjNDkxY04MjhhTkwYjA4M2JjYTkxYgAQAOPIKScmpUpHnVC6wffX0...> 2/2

Federal Subsistence Board  
Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 E. Tudor Rd. M/S 121  
Anchorage, AK 99503-6199

June 29, 2023

Dear Federal Subsistence Board,

Please accept this letter as the official public comment from the ADFG Juneau Douglas Advisory Committee in opposition to the federal Unit 4 deer proposals (WP24-04, WP24-05, WP24-06) to be considered at the Oct 2023 meeting. We understand that the proposal's authors wish to ensure a significant and meaningful priority is afforded to all Federally Qualified Users (FQUs). As our comments on previous iterations of these proposals have noted (see attached), we do not feel these proposals address this concern. Instead, they create significant loss of opportunity for non-federally qualified users when there do not appear to be conservation or FQU hunter-success concerns. In considering the Unit 4 deer proposals from 2022, the Federal Subsistence Board heard testimony to this effect and declined to pass those proposals. We urge the Board to follow suit and not support these proposals.

Sincerely,

Juneau Douglas Advisory Committee

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

Dear Federal Subsistence Board,

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

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

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

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

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

Juneau-Douglas Fish and Game Advisory Committee • 2022 Proposal Comments

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

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

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

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

Sincerely,

Juneau Douglas Advisory Committee

7/6/23, 4:03 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:21 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

Theo Matuskowitz  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudor Road, MS 121  
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Office: (907) 786-3862  
Telework: (907) 786-3888  
Fax: (907) 786-3898  
theo\_matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 4:07 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

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From: John Bohan <johnbohan1969@gmail.com>  
Sent: Tuesday, June 27, 2023 10:14 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

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1 of 1

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7/5/23, 4:03 PM

Mail - McKinney, Kayla T - Outlook

I am a 30 year Juneau resident and avid deer hunter. I mainly hunt in Tenakee Inlet and on Southwest Admiralty Island. I am writing to express opposition to proposals WP24-04, WP24-05, and WP24-06. These proposals are largely similar to proposals that have been submitted and have failed in recent years. I would urge the OSM to reject these proposals on the same grounds that the previous proposals failed. They are wholly unnecessary.

Thank you for considering my comments.

John Bohan  
Juneau Alaska

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7/6/23, 3:34 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Comments wp24-04, wp 24-05, wp24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:16 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

*Theo Matuskowitz*  
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theo\_matuskowitz@fws.gov

**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Friday, June 30, 2023 3:28 PM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] Comments wp24-04, wp 24-05, wp24-06

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**From:** Go Hawks <kennethsteven80@gmail.com>  
**Sent:** Friday, June 30, 2023 9:46 AM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Comments wp24-04, wp 24-05, wp24-06

[This email has been reviewed for compliance with DOI - Information Security Policy and has been deemed to contain no sensitive information.]

7/5/23, 3:34 PM

Mail - McKinney, Kayla T - Outlook

As a former Hoonah resident born and raised who is currently working and residing in Juneau I am writing in opposition to the above listed proposals. I mainly hunt and gather in Hoonah and Tenakee and feel these proposals would limit my ability to hunt and gather. Please reject these proposals on the grounds that previous proposals have been rejected by the OSM. They are unnecessary and not needed. The abundance of deer in southeast ABC islands is at an all time high deeming these proposals unnecessary. Thank you for your consideration in this matter.

Ken Brown  
Juneau

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7/6/23, 4:02 PM

Mail - McKinney, Kayla T - Outlook

FW: [EXTERNAL] Response to WP04 4 thru 6

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:21 PM

To McKinney, Kayla T <kayla\_mckinney@fas.gov>

**Theo Matuskowitz**  
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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Wednesday, June 28, 2023 11:07 AM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Response to WPD4 4 thru 6

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From: Thomas Chapin <garnetstreet@icloud.com>  
Sent: Tuesday, June 27, 2023 6:22 PM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Response to WP04 4 thru 6

doi:10.1371/journal.pone.0142092.g002

<https://data.rockwell.com/mails/rockwell/AAQADpANGELZTUqWJNDENDAJYDAMHHLTwyAAMQJYTBwyAQASCOvns782zLHwJwv9Kx%3F> 1/2

7/6/23, 4:02 PM

Mail - McKinney, Kayla T - Outlook

This is a condition brought on by road hunting. Perhaps we should consider fair chase and the sport itself....

Implement the half mile from the road rule and bring an end to this discussion....

People who hunt in these areas choose to road hunt. And it seems that Hoonah has the most complaints and the most roads...

Road access has been a deciding factor in previous game management decisions, and should be considered in this situation. Hoonah's road system (logging roads) are bordered by little more than clear cut areas.

Shooting from a vehicle is not fair chase and is far from sportsmanship!!!

To expect any benefits from our resources we must first respect them, and fair chase regardless of any entitlements or claims.

Thank you for this opportunity to respond....

Sent from my iPhone

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7/6/23, 4:10 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:25 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:57 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

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From: MATTHEW CRESWELL <mrcreswell@gmail.com>  
Sent: Tuesday, June 27, 2023 8:38 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Cc: matthew.creswell@juneau.gov <matthew.creswell@juneau.gov>  
Subject: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

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7/5/23, 4:10 PM

Mail - McKinney, Kayla T - Outlook

I am writing to voice my opposition to the proposed changes to allowing Juneau area hunters to access WP24-04, 05, 06.

I am an avid deer hunter and I believe it is extremely unfair to say that public lands should be set aside for a specific user group. These lands are for everyone to enjoy, not just people who live in the area. This is like saying that people from Hoonah can't come to Juneau and visit the Mendenhall Glacier. This is a bad way to manage public lands and I believe it should not be allowed to pass.

Thank you for your time.

Matt Creswell  
Juneau

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7/5/23, 4:15 PM

Mail - McInerney, Kayla T - Outlook

Fw: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:25 PM

To McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Matuskowitz**  
Supervisory Regulations Specialist  
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theo.matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:53 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

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**From:** John DeMuth <jdemuth@pndengineers.com>  
**Sent:** Monday, June 26, 2023 5:37 PM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

This work has been employed in a number of DCF – the process of developing and then, meeting attachments as responding.

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7/5/23, 4:15 PM

Mail - McKinney, Kayla T - Outlook

The following is in response to the latest round of prejudice proposals being considered to restrict only people who reside in Juneau, Alaska from being able to hunt deer in select, nearby areas. As before, these proposals are not based on data, facts or truth as was pointed out by the ADFG who put out a YouTube video that very effectively debunked any notion that Juneau hunters are having any significant impact to deer populations in these communities. Data and facts have always pointed to weather as the reason for deer population fluctuations – in Southeast Alaska and Kodiak.

Weather also is the main hinderance to hunters being able to get into the field. Couple that with high fuel prices, and it is very evident that few folks can afford the time, expense and own vessels that are able to handle heavy seas and freezing spray in Chatham and Icy Straits during late winter months. The opposite side of the coin is true as well – subsistence hunters in these communities are not going to risk weather and spend money on fuel for traveling any significant distance from their community to bag meat for the freezer – and folks from outside the community are not interested in hunting near a community where residences have a longer season and regularly are hunting for their own food. Hence, drawing up maps that have such large “exclusion zones” makes no logical sense. For example, why does the exclusion area for Hoonah include the north shore of Tenakee Inlet? So anyone who owns a remote cabin in Freshwater Bay or Tenakee is not allowed to hunt near their own cabin?

I respectfully ask that these politically motivated, emotionally charged, and divisive proposals that have no factual basis (like “Juneau hunters will miss their shots at deer, causing them to be more skittish) be once again rejected as bad policy that is not necessary and not supported by the ADFG, but instead is being pushed by native and bush community lobby groups who are not interested in effectively managing public resources for the good of all users, but rather to selectively exclude some users based on their place of residence.

Respectfully,

John DeMuth  
Juneau, Alaska

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7/7/23, 10:38 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Opposition to proposals

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:28 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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theo\_matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:41 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Opposition to proposals

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From: Jason Hass <jasonhass1@gmail.com>  
Sent: Monday, June 26, 2023 8:10 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Opposition to proposals

[This email has been reviewed for compliance with FOIA - Information Relating to the Privacy of Individuals and is being attached in this format.]

7/7/23, 10:39 AM

Mail - McKinney, Kayla T - Outlook

I am writing to voice my opposition to proposals WP24-04, WP24-05, WP24-06. Having been to all of the communities affected by these proposals, I firmly believe that these proposals are not needed. These proposals will also negatively affect folks in other communities, some of which depend on the resource as much as residents in the smaller communities.

Thanks for the opportunity to comment!

Jason Hass

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7/7/23, 11:34 AM

Mail - McKinney, Kayla T - Outlook

I oppose the three following federal proposals, WP24-04, WP24-05, and WP24-06, because they are not necessary nor are they based on any quantitative data, only speculation and opinion of one interest group. To claim that the presence of Juneau hunters during Nov 1 - Nov 15 is causing rural residents to not be able to harvest deer, is not based on any factual data. Examples of arbitrary unsubstantiated statements in the proposal include:

WP24-06

To the make the statement "This proposal is necessary for public safety..." Is disingenuous and has no basis of fact.

"Non-Federally-qualified users flock to Hoonah..." Again, this is an arbitrary statement that has no data to back up one person's view.

Similar statements are seen throughout proposals WP24-04 and WP24-05 as well.

I oppose all aspects of the three proposals.

Regards,

Wayne Hall

Juneau resident.

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7/6/23, 4:20 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:26 PM

To McKinney, Kayla T <kayla\_mckinney@fas.gov>

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Sent: Tuesday, June 27, 2023 1:52 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] WP24-04, WP24-05 and WP24-06

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From: Brandon Ivanowicz <bivanowicz@pndengineers.com>  
Sent: Monday, June 26, 2023 2:00 PM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] WP24-04, WP24-05 and WP24-06

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A direct measurement of the effect of dietary restriction on the expression of the *IGF1* gene in the liver of adult male rats was obtained by Northern blot analysis. The results showed that the expression of the *IGF1* gene was significantly reduced in the liver of the restricted rats compared to the control rats (Fig. 1). This result is consistent with the results of the *IGF1* mRNA levels in the liver of the restricted rats, which were also significantly reduced (Fig. 2).

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7/5/23, 4:20 PM

Mail - McKinney, Kayla T - Outlook

denied because they were based on anecdotal opinion of the animal population and not on scientific data. ADFG found the previous proposals unsubstantiated, and that any decrease in subsistence deer hunting success was due to decreases in subsistence deer hunting effort & purchase of hunting licenses, and not in the availability of animals in which current research indicates populations are high. Please revoke or deny this proposal because it again is based on unfounded ideas. It is important that all Alaska residents continue to have access to hunt on state owned public lands, particularly the areas referenced in the above proposals.

Brandon Ivanowicz

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7/6/23, 4:08 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] WP24-04, WP24-05, WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:24 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Tuesday, June 27, 2023 2:01 PM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] WP24-04, WP24-05, WP24-06

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**From:** Greg Lockwood <greenhoochie@icloud.com>  
**Sent:** Tuesday, June 27, 2023 12:29 PM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] WP24-04, WP24-05, WP24-06

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7/5/23, 4:08 PM

Mail - McKinney, Kayla T - Outlook

Please accept this comment for subsistence proposals WP24-04, WP24-05, and WP24-06.

In review of the Federal subsistence EIS as well as ANILCA Title VIII, I believe that the intent of these processes and documents is to focus on maintaining a healthy population of fish and wildlife for harvest while also allowing rural residents subsistence priority. Have there been any re-evaluations to the EIS since the 1992 ROD, it does not appear so on-line? Restrictions to hunting and fishing were predicted to only be needed when resources were below healthy numbers. Human populations have not increased since 1990 in most places in Southeast (SE) Alaska. Because of this, it is difficult to believe that the number of animals impacted has increased as much as was predicted by the EIS. In fact, in many locations in SE, including Pelican, human populations have declined. From what I understand, deer populations in Alaska game management Unit 4 are, according to Alaska Department of Fish and Game, healthier than all other units in the state. The EIS process ended with an alternative that met the purpose of giving subsistence hunting a priority while also claiming to limit the impacts to sport hunting. Shouldn't any regulations that are put into effect meet the same goals as the EIS? Additionally, I don't believe that anyone reviewing and commenting on the EIS, could predict implementation of regulations that impact sport hunting when there are healthy populations of resource animals. There would have been thick stacks of comments during the EIS if that was known.

It seems that it would be an easy exercise to partner with Alaska F&G to obtain information on the health of the deer herds, amount of impacts due to subsistence hunting compared to predictions in the EIS, and hunting pressure in the area.

Please do not make changes that effect the health and welfare of Alaskans until study work is complete to determine if deer populations are at risk. If they are not at risk, please do not make regulations changes without a new EIS and an opportunity for the public to comment. Anything else would be mismanagement of an Alaska resource without proper authority.

Thanks,  
Gwen Lockwood  
Greg Lockwood  
Juneau Alaska residents and Sunnyside cabin owners

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7/5/23, 4:02 PM

Mail - McKinney, Kayla T - Outlook

I am a lifelong Juneau resident and deer hunter. I find the proposals to close area's WP24-04, 05 and 06 unnecessary. I personally never hunt any of these areas but do worry about what it may mean for setting a precedence. If these zones can be closed for reasons that seem very subjective, (Too many people at certain beaches, No parking, Other hunters make deer skittish etc..) instead of more of a general concern for the deep population then everyone will have these concerns everywhere they go. I know the frustrations of ever increasing populations of people in your hunting areas, however if we go down this road, there is no end to the grips that people will have trying to eliminate other people's opportunities. The deer populations seem very high, there should be no reason why anyone should not be able to obtain their allotted amount each year with a little effort, especially in these areas. Thank you for your consideration,

--

**Bob MacKinnon**

Alaska Electric

PO Box 33835

Juneau, AK 99803

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7/7/23, 10:38 AM

Mail - McKinney, Kayla T - Outlook

I oppose the new proposals for argosy, hooded, and pelican areas. Southwest hunters have just as much right to hunt these areas as the residents. As a Juneau sportsman I have to travel further and hunt and fish harder than the people in these communities. This also costs me more. Residents of these areas can fill their freezers with sustainable, organic meat and fish at a fraction of the cost and effort it takes me or other Juneau residents. We all have a right to the land, water, and the resources it provides. Though I don't hunt all of the areas mentioned I have friends and neighbors that do, and they rely on that meat. Also by implementing these rules you would be taking away from an experience and a lifestyle for many, opportunities for youth, and at least with the hooded road system an opportunity for hunting that is not vessel based. I understand that hooded residents believe that the Juneau hunters are the problem, but they also benefit from the added revenue brought in town during a time of year with economic decline.

I oppose WP24-04, WP24-05, and WP24-06

Charlie Martella

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/inbox/id/AAQkADg4NGE1ZTUxLWJmNDI0NDY0MjhlTkwYjA4M2JlYTkwYgAQAKoH8%28VjzJGoVVCHQoc%...> 2/2





7/8/23, 4:21 PM

Mail - McKinney, Kayla T - Outlook

I am writing a letter of opposition to the proposals WP24-04, WP24-05, WP24-06 to close hunting to everyone except federally qualified subsistence users from November 1-15 in the areas listed. The reasons cited as obstruction for anchorage or no places to park along the road system are arbitrary. These are public access locations open on a first come basis. There is no reason that local residents cannot use these locations that are being claimed they are being denied access to. Living closer to these locations should actually mean local residents would be able to get to those prime locations first. Accusations that Juneau hunters are reckless, poor shots, and a safety concern is unfounded and offensive. Living in Juneau does not mean that all residents do not follow a subsistence lifestyle or are irresponsible hunters. I am a hunter from Juneau who helps support my family's food source by hunting and fishing. I hunt in all areas near Juneau and as far as Freshwater Bay on Chichagof Island throughout the season. My family members and friends also hunt for the purpose of meat gathering and take every care to harvest efficiently and responsibly. Many of us have taken or taught hunter education courses, always go to the range before hunting season to check the accuracy of our rifles, wear orange in the field and do the best we can to communicate our location to other hunters or avoid places where we know hunters may be. Accessing these locations by boat can also be dangerous for longer travel and the desire to hunt during the listed time frame are also the same reasons cited by the Southeast Alaska Subsistence Regional Advisory Board.

According to the letters submitted last year by ADF&G in response to similar proposals, members of these communities have actually reported a reduction in effort, however, maintain greater success in hunting, showing that there are plenty of deer for subsistence users to harvest with little effort. Deer populations in GMU 4 consistently have the highest deer pellet counts and other indices suggest the population is stable and sustainable.

I hope the Federal Subsistence Board references the data submitted last year by ADF&G when deliberating these proposals.

Thank you for your consideration.

Michelle Morris  
Juneau resident

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJlNDkxNDQxY04MjhhTkwYjA4M2JlYTYwYgAQAPsUkz13S96Eba7LseBovs%3D> 2/2

7/17/23, 10:58 AM

Mail - McKinney, Kayla T - Outdoor

Fw: (EXTERNAL) proposed hunting closures

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Tue 7/6/2023 12:27 PM

To McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Matuskowitz**  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, AK 99503-6199  
Office: (907) 786-3867  
Telework: (907) 786-3888  
FAX (907) 786-3898  
theo.matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:44 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] proposed hunting closures

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Website: <https://www.doi.gov/subsistence>  
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From: Richard Morris <akreeideal@gmail.com>  
Sent: Monday, June 26, 2023 8:37 AM  
To: All Subsistence, FW7 <subsistence@fws.gov>  
Subject: (EXTERNAL) proposed hunting closures

This article has been received from the Journal of the International Society for the Study of the Behaviour of the Human Eye, 1999, 19(1), 1-10.

<https://doi.org/10.1016/j.cmi.2018.05.001>

7/7/23, 10:36 AM

Mail - McKinney, Kayla T - Outlook

I am writing to oppose the proposed hunting closures in Southeast Alaska.

WP24-04 (Southwest Admiralty)

WP24-05 (Hoonah Area / NCCUA)

WP24-06 (Pelican Area / Lisianski Inlet)

There are several reasons that I oppose these closures. First and foremost is that the Alaska Dept. of Fish and game did a lengthy study and found that deer populations and hunter success has been improving throughout the area. Secondly, looking at some of the specific reasons that they want them closed are laughable. I am not sure that the locals don't miss any shots. I like to think that all hunters, whether from Juneau or one of the villages, try their best to shoot and kill the deer as accurately and humanely as possible. If the Juneau hunters were to anchor in less favorable areas would that make it better for them? I am not sure how the hunters make it a public safety concern in Hoonah, and similarly not sure how many Juneau residents take their cars over and take up all the parking along the miles of logging roads on Chichagof Island.

When it comes to the Hoonah area, I bought land and built a cabin specifically to hunt the area. This proposal would prevent me from doing the one thing I bought the property for. Are there going to be exemptions to allow property owners to still hunt in the area even if they are Juneau residents?

I hate to say it, but really all this proposal is trying to accomplish is to reduce the amount of hunters so that the locals don't need to put as much effort into the hunt. It is well known that Hoonah's hunters like to run the roads and shoot deer. Angoon residents hunt deer year round. Interesting how there is very little harvest data from the residents and that there were very few deer tags requested from the local hunters.

I also don't care for the proposal to close the hunt for the first two weeks in November. This is obviously the rut, and most Juneau hunters are looking for big bucks at that time. Both sexes are open for hunting and does come running in more than bucks do. There is plenty of opportunity for everyone to harvest their trophy or meat deer.

On a final note, Juneau residents can not hunt in January. This is the easiest time of year for hunting deer. They are all down low and close to the beach or on the beach eating kelp. This provides an easy opportunity for locals to harvest deer.

Thanks for your time hearing about why I oppose these propositions. Again, please refer back to the ADF&G report on Sitka Blacktail and base this off of science.

Cheers,  
Rich Morris

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJhNDkxNDQxY04MjhhTkwYjA4M2JhYjYwYgAQALoVMCKd%28BqOaS8tpKV...> 2/2

7/7/23, 10:54 AM

Mail - McKinney, Kayla T - Outdoor

Fw: [EXTERNAL] Deer hunting proposals

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Tue 7/6/2023 12:30 PM

To McKinney, Kayla T <kayla\_mckinney@fas.gov>

**Theo Matuskowitz**  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
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theo.matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:29 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Deer hunting proposals

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From: mniz@gci.net <mniz@gci.net>  
Sent: Sunday, June 25, 2023 9:05 AM  
To: All Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Deer hunting proposals

This email has been encrypted using a security of PGP (Open Source Pretty Good Privacy) and may contain attachments or responses.

I oppose the following proposals (WP24-04, WP24-05, and WP24-06).

<https://pubs.rsc.org/en/content/articlepdf/2018/ta/ta80001a>

7/7/23, 10:54 AM

Mail - McKinney, Kayla T - Outlook

My family has been hunting in these areas for three decades. I totally object to the reasoning for these new proposals, the arguments are simply not valid. When we are hunting in these areas we seldom see any other people.

Most of the hunting traffic we see are those that are trolling the beaches looking for an easy deer to shoot from their boats.

As a long time user of these areas I oppose these proposed regulations they are unwarranted.

Mike Nizich

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJNDEhNDAxY04MjhhlTkwYjA4M2JlYTkwYgAQAH0fmcxmtFYAGQ47KhCc%3D> 2/2

7/5/23, 2:40 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] submission of comments on WP24-04, WP24-05, WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:16 PM

To McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Matuskowitz**  
Supervisory Regulations Specialist  
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theo.matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>

Sent: Friday, June 30, 2023 3:26 PM

To: Matuskowitz, Theo TM <theo\_matuskowitz@fwa.gov>

**Subject:** Fw: [EXTERNAL] submission of comments on WP24-04, WP24-05, WP24-06

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From: Nicholas Orr <nicholasorr@yahoo.com>

Sent: Friday, June 30, 2023 8:59 AM

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

**Subject:** [EXTERNAL] submission of comments on WP24-04, WP24-05, WP24-06

This email has been encrypted using the security of PGP – (OpenPGP) for confidentiality and integrity, resulting in this message not responding.

### End-Point Assessment

<https://doi.org/10.1002/anie.201911111>

7/5/23, 3:40 PM

Mail - McKinney, Kayla T - Outlook

Please accept this email as my public comment in opposition to the federal Unit 4 deer proposals (WP24-04, WP24-05, WP24-06) to be considered at the Oct 2023 meeting. I understand that the proposal's authors wish to ensure significant and meaningful priority is afforded to all Federally Qualified Users (FQUs). However, FQUs already have significant and meaningful priority through their exclusive January season as well as the Federally Designated Hunter Program. I also disagree with the claim of the proposal's authors that non-federally qualified users are impeding or causing FQUs to have difficulties meeting their subsistence needs. In considering the Unit 4 deer proposals from 2022, the Federal Subsistence Board heard testimony to this effect and declined to pass those proposals. Finally, data from ADF&G does not show a decline in FQU success rates in any of the proposed areas.

Thanks  
Nicholas Orr

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJNDElNDAxY04MjhhTkwYjA4M2JlYUkxYgAQAHQzs98LolpUpu08FIEzmZw%3D> 2/2



7/6/23, 4:23 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:26 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Matuskowitz**  
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theo.matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:49 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

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**From:** James Parkin <jwparkin4@gmail.com>  
**Sent:** Monday, June 26, 2023 12:49 PM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

This work has been supported financially by DOE—(the authors are hereby thanking and thanking all the donors in the community).

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7/5/23, 4:23 PM

Mail - McKinney, Kayla T - Outlook

I oppose these proposals (WP24-04, WP24-05, and WP24-06) because they would negatively affect Families and they are not necessary because other conservation methods would be more beneficial". There are many family members of rural communities that have moved to Juneau for work, but return home to visit and hunt. These are precious reunions which would be reduced if these proposals passed.

Targeting bucks is a good conservation method and the rut is the best time to do that. Often however, rural residents will target does because they have more fat during the rut. This is true, but, perhaps education could be provided to rural communities as to the negative affect on overall deer numbers caused by targeting does. I am not suggesting closing or reducing doe hunting. That won't work! Knowledge and changing individual minds is the best chance for lasting change.

Thank you for you time

Sent from my iPhone

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7/5/23, 3:47 PM

Mail - McKinney, Kayla T - Outlook

WP24-04

WP24-05

WP24-06

My name is Ben Pinney and I am the Southeast director for the Alaska Bowhunters Association. While I speak only for myself and not directly for the ABA as this is not specifically bowhunting related, I do know quite a few hunters in Juneau. And Bowhunters throughout southeast and I have not heard one single instance that supports the reasons stated for these proposals.

I object to all above proposals as they are simply subjective statements not based on true data. NO hunting opportunities should be closed down without basing the decision on objective facts. Rebuttal to specific reason #1) Juneau residents may miss deer. Do we have any data on what that percentage that actually is? Also, do we know that it is any more significant than "local hunters" one could just as easily claim that local hunters miss deer more and this make the hunting more difficult for non locals.

Rebuttal to #2) Juneau Hunter anchor in all the best anchorage's this restricting access, where are all the best anchorages? How many "best" anchorages are there? What percent of the time has this actually occurred? 1 day out of the year or 20? There's a lot of missing facts on this one.

Rebuttal to #3 Juneau hunters are causing a public safety concern in Hoonah. Let's see the numbers clearly there must be documented public safety incidents that have happened. How many more incidents are due to Juneau hunters be local hunters? Again, let's see the facts.

Rebuttal to #4. Hoonah residents can't find a place to park due to so many Juneau residents. Once again, how many parking spots are there along the many miles of Hoonah roads? How many are truly taken up by Juneau residents. How is this hunter able to differentiate a Juneau car from a non local car every single time a vehicle is parked in the exact same spot that said person wants to park in?

There is a clear lack of data here and if we look at the most recent formation out out by fish and game regarding this subject, it is low local Hunter recruitment that is causing a lack of deer taken by locals vs non locals. The deer numbers are not being harmed by Juneau hunters. Fish and game has this data and I hope you will be making informed, clear fact based decisions.

Pls Vote no to all proposals WP24-4,5 and 6  
Until there is clear objective data that is significant.

Thank you for your consideration,  
Ben Pinney

Sent from my iPhone

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJhNDkxNDQxY04MjhhlTkwYjA4M2JhYTYgAQAHp1sPk1wK1GgcCN5SAsQ4s...> 2/2

7/6/23, 3:55 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] proposed hunting closures

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:20 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

1 attachment (13 KB)

View in browser

Theo Matuskowitz  
Supervisory Regulations Specialist  
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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Wednesday, June 28, 2023 11:59 AM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] proposed hunting closures

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From: Alex Reid <areid@fynders.com>  
Sent: Wednesday, June 28, 2023 10:56 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] proposed hunting closures

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7/8/23, 3:55 PM

Mail - McIntyre, Kayla T - Outlook

I oppose these proposals WP24-04, WP24-05, and WP24-06 because they are not necessary and are completely one-sided. This is the equivalent of me trying to shut down Costco to all the rural communities because they take up too much parking or buy the groceries I want. All winter deserve the same rights.



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7/7/23, 10:53 AM

Mail - McKinney, Kayla T - Outlook

I oppose these proposals (WP24-04, WP24-05, and WP24-06) because they are not necessary.

Thank you

Catherine Sullivan

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJjNDkxY04MjhTkwYjA4M2JlYTkxYgAQANCOFm%2B5bNFIPbZITllyp...> 2/2

7/7/23, 11:20 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:32 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

Theo Matuskowitz  
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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Thursday, June 22, 2023 2:35 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

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From: Joel Teune <joel\_teune@hotmail.com>  
Sent: Thursday, June 22, 2023 10:10 AM  
To: AK Subsistence, FW7 <subsistence@fw7.gov>  
Subject: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

This annual fee does not extend from outside of DOJ — the military justice system is still operating effectively, so's responsible.

Theo.

<https://doi.org/10.1002/anie.201911111>

7/7/23, 11:20 AM

Mail - McKinney, Kayla T - Outlook

Thank you for taking these comments. My comments are in regard to WP24-04,05,06.

I would like to start off by saying that I have not, nor do I intend to, hunt these areas; but I have faced similar Federal Subsistence changes for deer in Unit 2 near where I live. My stance then is the same now.

I do not support the proposed changes. I believe Alaska - rural or nonrural - is a tough place to live and has higher costs of living than the rest of continental U.S. Many Alaskans, like myself, do a fair bit of hunting and fishing for a number of reasons including recreation, high quality food, and to offset the higher costs of food at grocery stores. Since we are all privileged to live in a mostly free country, if I determine that my financial situation is not sustainable, I can relocate to a different area to improve my economic standing (higher paying job, lower cost of living, etc.). What I do not get to do is advocate limiting the rights of others using the words "subsistence" and "rural". In our day and age of "Amazon super saver shipping", I don't see the logic as valid. As a resident of the State of Alaska, I expect maximum access to opportunities to harvest game in ANY area of the State in which I reside. The best part about this, is everyone in the State gets equal access. If someone from Barrow wants to venture down to Unit 1A and hunt deer, excellent. If I want to venture to the interior and harvest Dall Sheep, excellent. Everyone has equal access - which means equal seasons, bag limits, etc.

I find it very undemocratic that the only say I get on these proposed changes (that affect a large number of people) is an email comment. I don't get to vote; I don't get any more than a comment.

Thanks for your time.

Joel Teune

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7/6/23, 4:50 PM

Mail - McKinney, Kayla T - Outlook

Fr. [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:25 PM

To: McKinney, Kayla T <kayla\_mckinney@fas.gov>

**Théo Matuskowitz**  
Supervisory Regulations Specialist  
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theo.matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:56 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

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From: Walker, Jesse <JWalker@coeur.com>  
Sent: Tuesday, June 27, 2023 7:01 AM  
To: AK Subsistence, FW7 <subsistence@fw.gov>  
Subject: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

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7/8/23, 2:50 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] =p24-05 hoodiah area

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:20 PM

To: McKinney, Kayla T <kayla\_mckinney@fas.gov>

**Theo Matuskowitz**  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, AK 99503-6199  
Office: (907) 786-3867  
Telework: (907) 786-3888  
FAX: (907) 786-3898  
theo.matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Wednesday, June 28, 2023 11:57 AM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] wp24-05 hoonah area

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From: Dennis Lavigne <denny@thundermountaindrywall.com>  
Sent: Wednesday, June 28, 2023 9:50 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] wp24-05 hoonah area

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*Editorial comments:* I have commented with interest on this paper and have enjoyed looking at it as a possible step towards the development of a new series of formal rules.

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7/7/23, 11:34 AM

Mail - McKinney, Kayla T - Outlook

Subsistence hunting and fishing are subjected to disproportionate levels of regulation and scrutiny. I am supportive of this proposal. I believe it is an innovative way to not only support, but to prioritize subsistence users' household needs in Hoonah and an investment in local food security.

Thank you for the opportunity to weigh in,  
Miakah

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJNDEhNDAxY04MjhhlTkwYjA4M2JlYTYwYgAQAIp%2BDo4AyhOsc000a8l9Ns...> 2/2

7/5/23, 4:24 PM

Mail - McInerney, Kayla T - Outlook

Fw: [EXTERNAL] WP24-05 Confidential

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:27 PM

To McKinney, Kayla T <kayla\_mckinney@fas.gov>

**Theo Matuskowitz**  
Supervisory Regulations Specialist  
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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:48 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] WP24-05 Comment

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From: Mark Sams <msams@pdengineers.com>  
Sent: Monday, June 26, 2023 11:45 AM  
To: Ali Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] WP24-05 Comment

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<https://doi.org/10.1002/anie.202011000>

473

7/6/23, 4:24 PM

Mail - McKinney, Kayla T - Outlook

The following is my comment in regards to the proposal WP24-05, closing down the deer hunting to non-subsistence use in the Freshwater Bay Area.

I am a property owner in Freshwater Bay on eastern side of Chikhegof Island. I do reside full time in Juneau, but do take time out of my busy schedule to hunt from my cabin in Freshwater Bay for Deer. I have invested significantly over the years in building and outfitting my property to allow me access to this area year round. Since I live in Juneau my ability to access my property is severely limited due to weather in Chatham Strait and Lynn Canal. I may get a weather window to access my property once per season that aligns with other work priorities. By shutting down my access to public land in this area and therefore inter as well, will significantly impact my ability to utilize my property for what I have built it for. Limiting the Tenakee spring area will have a similar effect for many another Juneau residents that may not have a subsistence permit. I utilize my tags similar to subsistence hunters and only have the ability to deer hunt in very limited windows that vary throughout the season from year to year. My partners and I have had extremely limited impact on the hunting resources of Freshwater Bay. We can only utilize the bay when weather is conducive for more than a few days at a time, which is very limiting that time of year. The costs for me to utilize my cabin are significant compared to Hoonah residents that can trailer a boat and launch. Also, Hoonah residents can access this area of hunting with increased ease since they are not limited by weather and wave height as I am to gain access.

I understand that local residents may feel that there is more pressure from Juneau; there are two issues not discussed:

1. Juneau residents hunting throughout southeast is not a new residence from multiple community's travel to hunt throughout southeast. To single out Juneau residents and to lay blame on Juneau is not a valid argument. If we are going to make regulatory decisions without factual data then I would say that non-subsistence hunters have less pressure on the stock since they are more selective when they pull the trigger, leading to less unrecovered animals and less overall impact the population. Why is Juneau recently being finger pointed when similar hunting pressure has been present for at least the 20 or 30 years. The severe weather over the last few years has led to more impacts to populations than Juneau hunters. This is proven when AKDF&G recently in the last few years increased the bag limit on the ABC islands to 6 deer from 4. Also, the eastern end of Chikhegof has had a reduced bag limit for deer for non-subsistence hunters for almost 15 years. This would lead me to believe that weather and subsistence hunting has had more effect on the availability than a few Juneau hunters that put the effort and money into making a long trip into the Chatham and Lynn Strait water bodies.
2. From my experience, the economics of hunting generally does not break even especially when travelling long distances. So, to close such a large area on Chikhegof does not seem economical for subsistence hunters to utilize the entire area.
3. Alaskan resources including game, are constitutionally mandated to be managed for all Alaskan's. Making an arbitrary closure to benefit one group at the expense of the whole population does not seem to adhere with the constitutional mandate.
4. I can understand the desire to provide subsistence hunters with greater opportunities in these small towns, with aging populations that are not able to physically do what they may have been able to do in the past. If a concern is that deer become too skittish during the hunting season, this proposal will not change that. Maybe opening up the season earlier to subsistence hunters would allow subsistence hunters to hunt prior to others and before deer become more aware of hunters in the woods, roads, beaches.

These are my few comments, to make sure I am clear. "I am against these proposed rule changes".

Thanks,  
Mark

Mark Sams, P.E., S.E. | Principal/Senior Engineer  
P|N|D Engineers, Inc.  
9360 Glacier Highway, Suite 100, Juneau AK 99801

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2/3

7/6/23, 4:24 PM

Mail - McKinney, Kayla T - Outlook

p: 907.586.2093 E: 907.586.2099 c: 907.723.6722

[mammi@sondenprosa.com](mailto:mammi@sondenprosa.com) | [www.sondenprosa.com](http://www.sondenprosa.com)

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3/2



June 30, 2023

Electronic Submission via [subsistence@fws.gov](mailto:subsistence@fws.gov)

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

**Re: Safari Club International Comments on Wildlife Proposal 24-05**

Dear Federal Subsistence Board:

Safari Club International ("SCI") submits this comment in strong opposition to Wildlife Proposal 24-05 ("WP24-05"), which would close federal public lands within the Northeast Chichagof Controlled Use Area ("NECCUA") in Game Management Unit 4 ("GMU 4") to Sitka black-tailed deer hunting for non-federally qualified users ("NFQUs") from November 1 to November 15. In February 2023, the Federal Subsistence Board ("FSB") rejected a related proposal, which sought to reduce the bag limit for NFQUs from six deer to two bucks (no does) within the NECCUA ("WP22-08"). WP24-05 has no more support than WP22-08, and it should be denied for the same reasons.

In denying WP22-08, the FSB acknowledged that it ran counter to the directives set out in the Alaska National Interest Lands Conservation Act of 1980 ("ANILCA") because the FSB "may only restrict non-subsistence uses on Federal public lands if it's necessary for the conservation of healthy populations of fish and wildlife, to continue subsistence uses of such populations or for health and human safety reasons."<sup>1</sup> The FSB found that the proposal did not meet the criteria for a closure or restriction to non-subsistence uses. WP24-05 suffers from the same deficiencies.

SCI fully understands and supports ANILCA's directive that subsistence use must be prioritized, and that non-subsistence use must be limited if a conservation need exists. However, the population of Sitka black-tailed deer in this area is healthy. There is no reason for non-subsistence hunting to be restricted to protect subsistence use. Accordingly, SCI urges the FSB to reject WP24-05.

<sup>1</sup> See Greg Risdahl, representative from the United States Forest Service, testimony on WP22-08 at the FSB Fisheries Regulatory Meeting, available at <https://www.doi.gov/sites/doi.gov/files/fish-fisheries-regulatory-meeting-2-feb-23.pdf>.

SCI Comments on Wildlife Proposal 24-05  
 June 30, 2023  
 Page 2 of 4

### **Safari Club International**

Safari Club International, an IRC § 501(c)(4) nonprofit organization, has approximately 70,000 members and advocates worldwide. SCI has two chapters and approximately 1,600 members and advocates who live and hunt in Alaska. Many SCI members live in urban areas in southeastern Alaska, and therefore would face reduced hunting opportunities if WP24-05 were adopted. In addition, many SCI members are professional hunters and guides in Alaska, whose livelihoods will be affected by this proposed restriction. Many nonresident SCI members visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

SCI's missions include conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation and wildlife management tool. SCI has long been an advocate of fair and equitable access to game resources in Alaska. And while SCI supports a subsistence priority as appropriate, SCI is concerned about the lack of biological or conservation support for WP24-05.

### **WP24-05's proposed closure is not authorized by ANILCA.**

The FSB should reject WP24-05 because it requests relief outside the subsistence priority established in ANILCA. ANILCA Section 815(3) allows the FSB to close federal lands to non-subsistence hunting in very limited circumstances. The statute provides that "[n]othing in this title shall be construed as ... authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands ... unless necessary for the conservation of healthy populations of fish and wildlife," or "to continue subsistence uses of such populations."<sup>2</sup> Thus, ANILCA preserves rights of non-subsistence hunters to share in hunting opportunities on public lands, unless "necessary" to protect either the wildlife resource or the subsistence priority. ANILCA does not authorize restricting NFQUs due to perceived "competition" between user groups.<sup>3</sup> WP24-05 makes no showing that this limited restriction standard has been satisfied.

Significantly, the deer population in GMU 4 is one of the largest in the state.<sup>4</sup> Pellet group transects, aerial alpine counts, and spring mortality surveys show a healthy deer population and do not suggest a decline in deer abundance or a conservation concern for the GMU 4 deer population.<sup>5</sup> A closure of NECCUA to NFQUs would not be "necessary" to ensure the

<sup>2</sup> 16 U.S.C. § 3125(3).

<sup>3</sup> *Nimilchik Traditional Council v. United States*, 227 F.3d 1186, 1192 (9th Cir. 2000) (finding that although ANILCA emphasizes the importance of subsistence lifestyles, its other goals include the preservation of recreational opportunities for sport hunting which inherently results in competition).

<sup>4</sup> FSB, FSB Public Materials (Volume II, Book C 2023), at 798, available at <https://www.doi.gov/sites/doi.gov/files/book-c-1-non-consensus-agenda.pdf> ("FSB 2023").

<sup>5</sup> *Id.* at 806.

SCI Comments on Wildlife Proposal 24-05  
 June 30, 2023  
 Page 3 of 4

“continued viability” of a healthy Sitka black-tailed deer population. The proponents of WP24-05 do not even try to assert that the closure is necessary for conservation purposes.<sup>6</sup>

The closure is also not necessary for the continuation of subsistence uses. Based on reported harvest data, hunting effort, and harvest success rates, the success of Federally Qualified Users (“FQUs”) has generally been stable and favorable over the last ten years.<sup>7</sup> According to Alaska Department of Fish and Game (“ADFG”) data, FQUs, including Hoonah hunters, have seen a decrease in the number of days of hunting effort required to harvest a deer.<sup>8</sup>

Notably, hunting effort by NFQUs has declined over the last twenty years. Accordingly, the data indicate that crowding and competition from NFQUs has not increased—but has decreased. Thus, the closure is not necessary for the continued subsistence use of FQUs. Since the proposal does not satisfy ANILCA, the FSB must decline to accept it.

**WP24-05 should be rejected because it does not comply with FSB regulations authorizing restrictions.**

It is also improper to close the area because WP24-05 does not satisfy the regulatory criteria that allows the FSB to restrict non-subsistence harvest. As noted above, under limited circumstances specified in Title VIII of ANILCA, the FSB is authorized to restrict, close, and reopen federal public lands to the non-subsistence hunting of wildlife.<sup>9</sup> The FSB has implemented these provisions in regulations, which provide that the FSB may only approve a proposed restriction of non-subsistence uses of a particular wildlife population if “necessary for the conservation of healthy populations of fish or wildlife, to continue subsistence uses of fish and wildlife, or for reasons of public safety or administration.”<sup>10</sup> None of these limited justifications exist on the facts presented.

GMU 4 hosts one of the largest deer populations in the state. The ADFG’s comprehensive data do not suggest a decline in deer abundance or a conservation concern.<sup>11</sup> Further, the closure is not necessary for continued subsistence use. Data show that over the last twenty years, FQUs’ effort to harvest deer have remained low while their success has increased. NFQUs’ days of effort have also declined, reducing the potential overlap of hunting days between the two groups.<sup>12</sup> The proposal cites no data in support of its assertion that subsistence harvest will benefit from closing non-subsistence use, and the mere statement that subsistence use has

<sup>6</sup> FSB, Federal Subsistence Management Program 2024-2026 Wildlife Proposals (Part I), at 17, available at <https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf>.

<sup>7</sup> FSB 2023, at 816.

<sup>8</sup> *Id.* at 815.

<sup>9</sup> 16 U.S.C. §§ 3114, 3125(3), 3126(b).

<sup>10</sup> 36 C.F.R. § 242.10(d)(4)(vi).

<sup>11</sup> E.g., FSB 2023 at 798.

<sup>12</sup> FSB 2023 at 815.



SCI Comments on Wildlife Proposal 24-05  
June 30, 2023  
Page 4 of 4

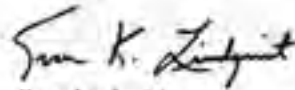
declined due to competition with NFQUs is unsupported.<sup>11</sup> The proponents do not cite any concerns about public safety or administration.

The proponents have not demonstrated a conservation need, a subsistence continuation concern, or a concern for public safety or administration. Therefore, the FSB should not approve WP24-05 because it does not meet the standards set forth in its implementing regulations.

#### **Conclusion**

SCI urges the FSB to follow their reasoning from February 2023, and to reject WP22-05. Thank you for the opportunity to comment on this important proposal. If you have any questions or need anything further, please contact Madie Demaske, SCI Litigation Associate: [litigation@safariclub.org](mailto:litigation@safariclub.org).

Sincerely,



Sven Lindquist  
President, Safari Club International

<sup>11</sup> See SERAC Proposal, Federal Subsistence Management Program 2024-2026 Wildlife Proposals (Part I), at 17, available at <https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf>.





7/5/23, 3:53 PM

Mail - McKinney, Kayla T - Outlook

Re: Public Comment on Proposals WP 24-04, WP24-05

I am writing in opposition to Proposals WP24-04 and WP24-05 regarding deer hunting closures in the Hoonah and Southwest Admiralty areas. I am an Alaskan who lives in Juneau but am not currently qualified for federal subsistence. I respect the intent of the federal subsistence programs in Alaska but feel these proposals are not necessary. The deer populations in these regions are successfully managed by the Alaska Department of Fish and Game and are currently considered healthy. Further, both of these proposals make unfounded claims regarding Juneau and non-federally qualified hunters without supporting scientific evidence or data.

Please respect that the State of Alaska has management authority for wildlife resources in Alaska and that all Alaskans deserve access to these resources if there is not a valid subsistence hardship. Reject Proposals WP24-04 and WP24-05.

**Chris Lunsford**

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJNDElNDAxY04MjhhlTkwYjA4M2JlYTkxYgAQAHp5dDQcc3KGJg8qs0qUb5pg%3D> 2/2

June 29, 2023

ATTN: Theo Matuskowitz,

I find it hard to believe we are here again after last year's discriminatory and unscientific proposals (WP-22-7, WP22-08, and WP22-09). The resources that were spent to contest the proposals are real dollars and to see another set of proposals so similar which are based on **subjective statements and emotions** is alarming. I once again **strongly disagree** with the current proposals – WP24-04 – WP25-05 – WP26-06 and find the proposed restrictions potentially stressful on Juneau hunters, unnecessary, and polarizing. I also feel those who keep bringing these proposals forward need to be held accountable to repay the monetary resources that are spent to refute.

- ✓ **Juneau residents may miss deer, causing deer to be skittish** – There is no verifiable data on the shooting accuracy of Juneau hunters versus others or the measurable correlation of missing a deer and the future productivity of a geographic area. I have personally harvested deer in the same location multiple times throughout a hunting season.
- ✓ **Juneau hunters obstruct access by taking best anchorages** – what constitutes a "best anchorage"? How many are there? Has someone actually looked up the registrations of these boats to verify where the owners are from? Perhaps there from Haines, Skagway, Gustavus? I would also argue that rural residents unequivocally have the advantage to all the best access because they live there. Furthermore, they do not have the burden to travel in November from Juneau. More often than not southern Lynn Canal, Icy Strait, and Northern Chatham are unsafe for travel. If you restrict hunting access to a calendar in November it may be the only week or two it's even possible to safely navigate the treacherous water ways. In other words when the weather allows you to travel we need to go!
- ✓ **Juneau hunters are causing a safety concern** – Limiting access and congregating Juneau hunters will actually help create a safety concern. What's next shall Juneau resident's discriminate against Alaskan neighbors based solely on their zip code from going to Juneau? Restricting their movement and access to Costco/ Fred Meyers / Western Auto during peak shopping times? One could arguably make the same case because of the increase in car traffic they are ruining our carbon footprint. Taking the best parking spots, and creating a public safety concern on our highways. Not to mention the air we breathe and the increase probability they could spread COVID or another unwanted safety risk. This type of radical thinking has no end and needs to be abolished.
- ✓ **Juneau hunters are not allowing parking spaces to hunt in HNH**– This is probably the most ridiculous of all the proposals. It's obvious whoever wrote this does not actually travel the logging road infrastructure that is in place surrounding Hoonah on Chichagof Island. The opportunities to get out of your vehicle and hunt are limitless simply by pulling off to the side of the road.

In conclusion we need to stop playing politics and listen to the wisdom from Alaska Department of Fish & Game's conclusion to WP-22-7, WP22-08, and WP22-09 "after examining decades of data, the Alaska Department of Fish and Game's Division of Wildlife and Conservation concluded that the hunting regulation changes are not needed and would unnecessarily deprive some hunters of opportunity." I am hopeful this will once again be the outcome to these new proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam S. Anderson". The signature is fluid and cursive, with the first name "Adam" and last name "Anderson" clearly distinguishable.

Adam S. Anderson  
16671 Ocean View Drive  
Juneau, AK 99801

June, 23, 2023

TO:  
 Federal Subsistence Board - Attn: Theo Matuskowitz  
 Office of Subsistence Management  
 1011 East Tudor Road, MS-121  
 Anchorage, AK 99503-6199  
 subsistence@fws.gov

Southeast Subsistence Regional Advisory Council  
 c/o DeAnna Perry  
 P.O. Box 21628  
 Juneau, AK 99802  
 Phone: 907-209-7817; E-mail: deanna.perry@usda.gov

FROM:  
 Roger Harding  
 1785 Mendenhall Peninsula Road  
 Juneau AK 99801

Re: WP 24-06 (Primarily) but also WP24-04 and WP24-05

Dear Southeast Subsistence Regional Advisory Council:

I am writing these comments to express my opposition to WP24-06, but my comments are also germane for WP24-04, WP24-05. This proposal seeks to reduce the opportunity of non-federally qualified users (NFQU) to participate in Lisianski Inlet deer hunting. The Alaska Department of Fish and Game (ADFG; issued June 7, 2021) has made it abundantly clear that there is no conservation concern for deer in the Lisianski Inlet area, and the available data indicates that deer populations in the area remain abundant. Furthermore, the best available data suggests that it is unlikely that hunter harvest has reduced deer abundance in this area.

The proposal specifically seeks to "eliminate competition" during the prime deer hunting period to only FQU in the Pelican area. Not only is this time of year arguably the best, and some of the "most efficient" hunting times for harvesting deer, it is also the prime time for hunters to participate, including non FQUs. Traditionally, this is a time of year when family and friends get together in Pelican to hunt and spend time together around the Thanksgiving holiday. There are many families and groups of friends who have spent part of their lives in Pelican but have had to move elsewhere for medical, education, or economic reasons. Imagine a scenario where a family and their friends gather in Pelican for Thanksgiving and to hunt, just as they have for many years. However, if this proposal is adopted not everyone in the family would be eligible to legally hunt deer. If adopted, this proposal could fracture long-time bonds of many traditional hunting groups and generations of family and friends who have hunted together for years.

If the intent of this proposal is to eliminate non-Pelican based hunters, then I think this proposal will fall short, as FQU from Haines, Gustavus and Sitka would still be allowed to hunt during the proposed time closure. There are of course hunters who do come from Juneau (like myself), and they often have deep

roots or economic or personal connection to Pelican. If this proposal is adopted and this logic is applied to other resources that become harder or more time consuming to harvest, then only FQU would be allowed to harvest, salmon, rockfish, or shrimp in the Pelican area at the peak of their seasons. Is this the road or direction the Federal Subsistence Board wants to go down?

While I do not endorse the following suggestions, I am including them only as possible alternatives to reduce the feeling of competition:

- 1) In order to avoid competition from NFQU, allow only FQU to hunt on every Wednesday from Aug 1 – Dec 31. This would provide an opportunity to hunt without competition throughout the season.
- 2) Install mooring buoys (USFS or others) in areas where anchoring a skiff can be problematic during deer hunts. This could open up more areas for all hunters throughout the season.
- 3) Allow NFQU to hunt during January if the two week closure in November is adopted.
- 4) Go through the Board of Game process to limit the number of guided deer hunts in the Pelican area.
- 5) Allow only one or two deer to be harvested per NFQU in the Pelican area during the proposed time frame. This might reduce the perceived believe that dozens of deer are being harvested by non-FQU hunters.

I fully support the concept that FQUs should have priority for the resources needed to ensure that rural residents can feed their families and continue to live in rural areas. However, changes to the Federal Subsistence Management are only allowed and necessary when there are conservation concerns for these resources, and this is certainly not the case for deer in the Lisianski area.

I have owned property within the City of Pelican for the last 25 years (33019 Whiskey Flats), paid my property taxes, and enjoyed the hunting and fishing opportunities available in Lisianski Inlet. While my principal residence may be in Juneau, the best part of having property in Pelican is the enjoyment of being part of the wonderful community of people who live in the Lisianski Inlet. If a conservation concern for deer populations in the area ever did occur, I would absolutely support a proposal to limit harvest by NFQUs, but that is not the case right now.

The comments I have provided in opposition to WP24-06 are based upon data and analysis that clearly shows there is no conservation concern for deer populations in Lisianski Inlet. My comments also apply in opposition to WP24-05 and WP24-04, which have also shown no conservation concerns, and if passed, would limit opportunities for NFQU hunters to harvest deer on Admiralty Island as well as in the Pelican area. All of these proposals are contrary to ANILCA Section 816(b), and if adopted, would cause undue hardship to Alaskans from Juneau, Ketchikan, and other areas outside of Southeast Alaska, as well as non-resident deer hunters. The intent of the ANILCA was to ensure a subsistence priority and restricting deer harvests opportunities by NFQUs is only authorized for the conservation of healthy populations. If adopted, these proposals would not follow the intent of ANILCA as directed by Congress.

Thank you for the opportunity to comment on these proposals.

Sincerely,

Roger Harding

To whom it may concern,

I am writing in regards to the following proposals:

Admiralty: WP24-04

Chichagof (Hoonah): WP24-05

Lisianski (Pelican): WP24-06

I am a lifelong Alaskan who lives in Juneau. I hunt in the Pelican area described in the proposal, but would like to speak to all of the proposals. I would suggest, as someone who hunts the Pelican area every year for last ~10 years, that the last few years have been much more difficult to harvest deer during the fall. This has likely caused these communities for look for someone to blame. Juneau (or non-local) hunters are an easy target; however, I do not believe the correct one.

I am deeply sympathetic to the needs of individuals living in the small communities of Southeast Alaska. The hardships endured by these folks are very real. However, I do not see limiting hunting access as a solution. Every study that has ever looked at the topic has found that hunter predation on the Sitka Blacktail Deer population in Southeast Alaska has found that hunting is an insignificant contribution to loss of deer. I certainly understand that it would be challenging for a local from any of these communities to see hunters not from their town leaving with deer, when they themselves haven't been able to harvest deer.

I believe the explanation for the apparent "shortage" of deer has been warmer winter weather not producing as much snow, especially in the early season. For many of these small communities, hunting is performed by driving a boat around looking for deer on beaches. Without enough snow to drive the deer down off of the mountains, I have seen less deer on beaches in the last few years. However, if one is willing to go into the woods, there are plenty of deer to be found at higher elevations. This matches with any of the recent deer surveys suggesting there are no major drops in deer populations in these regions.

I believe that these smaller communities hope for plentiful, easy to shoot deer on the beaches will not happen regardless of whether these proposals are passed or not. It will depend more on whether there are early and heavy snowfalls. I would respectfully request that you reject all of these proposals as I believe they would not address the proposed concerns, and would unfairly limit one group of Alaskan's access to a plentiful resource.

-Justin Dorn  
Juneau, Alaska

**From:** [Venom, Katerina on behalf of AK Subsistence, FW:](#)  
**To:** [Dennis Gentry \(dennis.gentry@alaska.gov\); Subsets, James S](#)  
**Subject:** Pw: [EXTERNAL] Deer closure comment for Southeast Alaska  
**Date:** Wednesday, October 25, 2023 2:19:12 PM

---

Office of Subsistence Management  
 U.S. Fish and Wildlife Service - B7  
 1011 E Tudor Rd, MS 121  
 Anchorage, AK 99503-6199

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**From:** cjs16@me.com <cjs16@me.com>  
**Sent:** Wednesday, October 25, 2023 11:29 AM  
**To:** AK Subsistence, FW7 <subsistence@fwal.gov>  
**Subject:** [EXTERNAL] Deer closure comment for Southeast Alaska

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All people can equally compete for deer in Southeast Alaska on Federal and State Lands. That is fair to all hunters wishing to live a subsistence lifestyle, regardless of their address.

Some communities already have extended seasons for deer harvest to shoot deer when they are the most vulnerable, in January.

The biggest killer of deer in Southeast Alaska is Winter.

If anything, if there are less deer near Angoon or Hoonah it is most likely that they are shooting any deer possible during January, with no regard to age or sex. Killing female deer and immature deer is a sure way to decrease next year's opportunity to shoot more bucks and larger deer.

I oppose any subsistence priority based on race, gender or address.

Respectfully,  
 CHARLES SCHULTZ  
 Juneau, Alaska  
 Lifetime Sportsman



**From:** [Veness, Katherine](#) on behalf of [AK Subsistence, FW7](#)  
**To:** [Roberts, Javier J](#)  
**Subject:** Fw: [EXTERNAL] Deer closures  
**Date:** Wednesday, October 25, 2023 10:19:56 AM

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**From:** Richard Morris <[akreekbeal@gmail.com](mailto:akreekbeal@gmail.com)>  
**Sent:** Wednesday, October 25, 2023 10:05 AM  
**To:** AK Subsistence, FW7 <[subsistence@fws.gov](mailto:subsistence@fws.gov)>  
**Subject:** [EXTERNAL] Deer closures

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I am against any deer closures. ADF&G has been researching blacktails and the numbers show there are plenty of deer available to all hunters.

Rich Morris

**From:** [Vimont, Kaiting](#) on behalf of [AK Subsistence, FW7](#)  
**To:** [jdemuth@pndengineers.com](#); [Robert, Jacob S](#)  
**Subject:** [FW: \[EXTERNAL\] Deer Proposals](#)  
**Date:** Wednesday, October 25, 2023 10:20:20 AM  
**Attachments:** [phone-icon\\_b03e493-3b6d-4672-a720-bd75de0967.png](#)  
[email-icon\\_b03e493-3b6d-4672-a720-bd75de0967.png](#)  
[email-icon\\_b03e493-3b6d-4672-a720-bd75de0967.png](#)  
[email-icon\\_b03e493-3b6d-4672-a720-bd75de0967.png](#)

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**From:** John DeMuth <[jdemuth@pndengineers.com](mailto:jdemuth@pndengineers.com)>  
**Sent:** Wednesday, October 25, 2023 10:10 AM  
**To:** AK Subsistence, FW7 <[subsistence@fws.gov](mailto:subsistence@fws.gov)>  
**Subject:** [EXTERNAL] Deer Proposals

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SRAC,

I am writing to voice my opposition to the proposed deer closures, as specifically identified in WP24-04, 05 and 06. As was the case with the previous, similar proposals, these are political in nature and represent subjective opinions of a small, select group that is in complete contrast and contrary to all available scientific and biological evidence which is why ADFG opposes these as well. I ask that common sense be used to consider the benefit of all Alaskans and not give-in to the special interest groups pushing these proposals.

Best Regards,

John DeMuth, PE, SE | Vice President  
 9360 Glacier Highway, Suite 100, Juneau, AK 99801

(O) 907.586.2093 | (M) 907.721.1645

**From:** [Venom, Katerina](#) on behalf of [AK Subsistence, FW7](#)  
**To:** [DawnA.gerry@alaska.gov](#); [Bullock, Jason S](#)  
**Subject:** Pw: (EXTERNAL) Proposed Deer Hunting Closures  
**Date:** Wednesday, October 25, 2023 10:19:19 AM

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**From:** Alex Reid <[reid.alex.907@gmail.com](mailto:reid.alex.907@gmail.com)>  
**Sent:** Wednesday, October 25, 2023 10:06 AM  
**To:** AK Subsistence, FW7 <[subsistence@fwl.gov](mailto:subsistence@fwl.gov)>  
**Subject:** (EXTERNAL) Proposed Deer Hunting Closures

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This email is in regards to the proposed closure for deer hunting:  
 WP24-04 - Angoon deer closure  
 WP24-05 - Hoonah deer closure  
 WP24-06 - Pelican deer closure

I would like to state that I am against these proposed closures. ADG&G has performed studies and proven that claims made in support are completely unfounded and emotionally charged. They have no scientific backing. Why make a decision that will damage inter-community relationships if there will not be any benefits. Giving one group more rights than another creates division among Alaskans. Individuals who live in these communities already have a major advantage in hunting these areas and with minimal effort can fill their tags. It is much more difficult for hunters from Juneau to fill their tags, it is far better to let hunters come into these communities and support the local economy.



10/24/23 RAC meeting

\*6 mile

\*5 talk

Thank you Mr Chair -

Hello- Thank you for this opportunity to comment.

Tim Mike Bethers, a 75 yr old lifelong deer hunter from Adke Bay. I ~~been operating~~ about 50 days a fall hunting deer on Admiralty and Chuchagof with most of my effort in Tenakee. I haven't been on the Hoonah road system in decades. Never shot a deer near the road, from a vehicle or boat. I like to hunt deer ~~on their own ground~~ in the woods and still hunt and use a call. I have ~~been getting~~ all the deer my family needs and I let many more deer walk away.

If an old guy in my condition can do it, ~~if~~ I can't understand why FQ hunters are not taking advantage of the currently robust deer populations. Instead of taking advantage of their current priorities and putting meat in the freezer, FQ hunters are coming up with unjustifiable proposals that would really foul up deer hunting for me and other NFA hunters.

Very similar

Subsistence deer proposals 22-07, 22-08 and 22-10 were ~~soundly~~ defeated earlier this year because available data showed that 1-decreased <sup>FQ</sup> harvest was not due to competition from NFA hunters from Jase but rather to documented <sup>reduction</sup> of hunting effort in Angoon, Hoonah and Pelican - and

↓



2

- 2- There is absolutely no shortage of deer or no known conservation concerns - and
- 3- Proposed closures would actually cause increased conflict between FQ and NFA hunters on state tidelands

These current proposals, WP-24-04, 24-05 and WP24-06 should also be withdrawn or defeated ASAP because -

- 1- There is no apparent increase in FQ hunting effort <sup>obvious</sup> attempts to increase FQ deer harvests - and -
- 2- Deer populations in NSE are at <sup>or near</sup> carrying capacity and near all time highs - there's even more deer this yr than last year.

What is a "meaningful priority"? If current priorities aren't "meaningful," what is? FQ hunters already have -

- 1) Seven full months (over  $\frac{1}{2}$  the yr) to <sup>totally</sup> hunt deer - <sup>1 month over NFA</sup>
- 2) Designated hunter program so FQ don't have to shoot their own deer and -
- 3) FQ hunters live right in the hunting areas where deer are readily available.

FQ hunters submitting these proposals already have significant priorities and they are not taking advantage of them, ~~overexpending~~ additional effort to put meat in the freezer



3

Please note that all three communities submitting these proposals already have the best (most efficient) deer hunting in the state of Alaska.

Specific comments for Angoon WP 24-04

Angoon's population has dropped 38%. FQ deer harvest has dropped 37% since 2007. The number of hunters is down 23% and overall hunting effort down 43%. Hunting effort is clearly down, however, Angoon hunters who prior to 2006 took 2.1 days to harvest a deer now need only 1.9 days. - Just about the most successful deer hunting in the state.

Angoon proposes to close a very large area to NQ hunters, but only 25% of their annual harvest comes from this area. Obviously, Angoon hunters travel much farther to hunt even with high fuel + travel costs.

Aerial alpine deer surveys this summer showed the highest deer counts on Southern Admiralty. Also, two parties I know who made alpine hunts in the proposed closure saw more deer than ever before.

Also, the <sup>average</sup> 29 NQ hunters hunting Angoon are likely property owners or have ties with Angoon residents.





4

An average of 36 non-Angoon hunters hunt this area annually and its been stable for 25yrs  
There is not a big fleet of AQ hunters randomly travelling to Angoon to hunt deer

Another observation shows that subsistence/pers use fishing permits issued in Angoon has dropped 60+ % since 2013. It looks like a significant reduction in Angoon subsistence fishing and hunting activity

#### Specific Comments for Hoonah WP24-05

From 2013 - 2022 the number of active FA Hoonah hunters dropped 23%, and total hunting effort in days dropped 54%, even though population increased (8%).

Hoonah pretty well Gut shot its local wildlife habitat and hunting area by building miles of roads and clearcutting thousands of acres of excellent deer/wildlife habitat. Now the long term impacts is what we must deal with. The roads and new clearcuts made deer hunting very easy, but now when clearcuts have grown up, and after shooting many generations of road/ditch dwelling deer, things are different. Locals tell me that soon after doe seasons that deer get scarce along the roads. Surviving deer now live in the woods - off the roads.





5

Local Hoonah hunters climbing hills and hunting timber away from the roads tell me they have no problem getting all the meat they need. Actually, Hoonah hunters still getting out there are having better success than in the past. This summers aerial deer surveys showed very high numbers of deer on mountain tops near Hoonah.

The great numbers of NFG hunters reported flocking to Hoonah likely includes non-local FG hunters as well. The number of non-local hunters using Hoonah has actually dropped 20% from 2013-2022. Reduced ferry service may have something to do with this.

Also note that even though Hoonah population has increased 8%, the number subsistence/pers use fishing permits has dropped 40% since 2013. It looks like interest in hunting and fishing in the villages is dropping. I wonder what modern Technology and interests of our young people have to do with this?

Specific Comments for Pelican WP 24-06

Pelicans population has dropped 40%. The number of





6

hunters is down 35% and hunter effort in hunter days is down 53%. Pelican hunters have the best documented deer hunting in SE AK, but with so few hunters, how do they expect harvests at decades ago?

### In Conclusion

FQ hunters don't need any increased priority to the deer resource. They already have a month longer season than NQ hunters which makes a 7 month long season.

FQ hunters can easily use designated hunters to shoot their deer. FQ hunters live in villages located right in the hunting areas - and contacts living in the villages tell me that a deer also living in the villages.  
there are

FQ hunting effort in Angoon, Hoona and Pelican remains down 43% to 53% from days past while deer populations are at the top of the chart.

And There are simply not enough NQ hunters <sup>hunting</sup> of the proposed closures to impact local FQ deer harvest.

Given the current robust deer populations, lack of FQ hunter effort and potential conflict that proposed closures would cause between FQ and NQ hunters, there is no <sup>legal</sup> justification available in ADILCA ~~cases~~ to support the proposals



7

WP 24-04, 24-05 and 24-06 should be rejected at the earliest opportunity

It looks like hunting and fishing may be losing interest in the villages. I would suggest that hunting, fishing and subsistence methods be injected into locals schools to promote this life style in the communities.

Keep in mind that Angoon, Hoahoh and Relican already have the best deer hunting in the state. However, why don't they propose to extend the "real" subsistence season two weeks into February? This would not have any impact on NQ hunters and FA could have exclusive use of the resource on the beach where they could be harvested in a most efficient manner. Doe's fetus's may be a little larger, however, shooting a pregnant doe in early February would be no different than shooting her in mid December.





**unapologetically FOR ALASKAN RESIDENTS**

PO Box 80095, Fairbanks, Alaska 99708 (907) 374-7139  
email: info@residenthuntersofalaska.org web: www.residenthuntersofalaska.org

June 21, 2023

To: Federal Subsistence Board

Re: 2024-2026 Wildlife Proposals

Dear Chair Jacobson and members of the Federal Subsistence Board,

Below are comments from Resident Hunters of Alaska (RHAK) on Wildlife Proposals before the board for the 2024-2026 regulatory years.

**Wildlife Proposal 24-03 – close a portion of Unit 1C, remainder (RG015 permit area) to goat hunting by non-Federally qualified users from Aug 1 – 31.**

### OPPOSE

*(Board members please note that Unit 1C Remainder is the RG 013 permit area, **not** the RG 015 permit area described in the proposal. Unit 1C Remainder under the RG 013 permit already had season dates for goat Aug 1 – Nov 30.*

*We believe the proponent of this proposal means the RG 015 permit area in Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River.)*

As the proponent of WP 24-03 correctly states, the Board of Game at their Southeast meeting in 2023 passed proposal 31 from Resident Hunters of Alaska that expanded the Unit 1C goat registration hunt RG 015 permit season to Aug 1 – Nov. 30. This change aligns the season dates on the north end of the Chilkat Range with the southern end. In no way does this expanded RG 015 season take away from subsistence goat hunting opportunities or prevent subsistence hunters from harvesting a goat.

A "preference" to federally qualified users does not mean there needs to be an absence of NFQU opportunities, which the proponent of this proposal advocates. Competition alone is not a valid reason to restrict NFQU.

Alaska Department of Fish & Game data shows that over the past five years there has been an average harvest of 3 -9 goats on the entire Chilkat Peninsula, with few hannies being taken. Goats on the Chilkat Peninsula have increased from the lows of the past and current harvest quotas are not being reached. There is no reason to restrict NFQU during Aug 1 – 31.

Wildlife Proposals 24-28 and 24-29 (which we support!) seek to lower the caribou bag limit and allowance to take so many cows for all users on federal lands within the WACH's range and should either of those pass we believe they will help protect cows, allow the herd to begin to rebound, and make a permanent caribou hunting closure to NFQU unnecessary.

As the herd increases, these temporary caribou hunting closures to NFQU should be rescinded.

---

**Wildlife Proposal WP 24-26 – extend the temporary Dall sheep hunting closure for all users on federal lands in Unit 24B and 26B west of the Sagavanirktok River through the 2024-2026 cycle**

#### **OPPOSE**

We respectfully request that the board defer this proposal, as the Board of Game will be meeting in March 2024 to deliberate on proposals that if passed will address sheep conservation concerns in the central Brooks Range and imposing limits on nonresident sheep hunters.

As stated in our previous comments, RHAK is very concerned about sheep declines across the state, especially state regulations that allow unlimited nonresident sheep hunting, which requires hiring of a guide. There are proposals before the Board of Game seeking to limit or restrict nonresident sheep hunters in Units 24B and 26B who account for over 40% of the harvest of sheep in these areas.

The FSB does not have the authority to limit only nonresident non-local sheep hunters, and we do not believe resident sheep hunters need to be restricted in these units. These areas are one of the only road-accessible areas where resident sheep hunters can access the sheep, and they are primarily restricted to archery-only hunting (with a very low success rate) within the Dalton Highway Corridor Management Area.

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**Wildlife Proposals 24-04, 24-05, & 24-06 – close portions of federal lands on Admiralty and Chichagof Islands to deer hunting by NFQU from Nov 1 – 15**

#### **OPPOSE**

These 3 proposals are essentially do-overs of those that were not passed by the board in 2023, and the rationale the board used to deny those deer hunting restrictions to NFQU on portions of the ABC Islands in Unit 4 last year very much still applies to these proposals.

Data from the Alaska Department of Fish & Game debunked claims in proposals heard by the board in 2023 that deer populations in Unit 4 were down. Deer populations in Unit 4 are abundant and healthy and near carrying capacity. And there was absolutely no real evidence by proponents of deer hunting restrictions on NFQU that subsistence needs were not being met,

The same applies to these proposals before the board for the 2024-2026 cycle.

As to evidence of subsistence needs not being met, we again did not see any such evidence in Wildlife Proposals 24-04, 24-05, or 24-06. NFQU are *not* "obstructing access," nor are they altering deer behavior, as stated in WP 24-04. The one factual statement in WP 24-04 is that NFQU compete with locals for the deer resource. But that does not mean that such competition prevents subsistence needs from being met during the peak of the rut Nov 1 -15, which is when proponents of these proposals want non-local deer hunters restricted.

As mentioned in our RHAK testimony before the board last year, "competition" alone is not a valid reason under ANILCA guidelines to restrict NFQU. We explained that of course every hunter would like it if he or she was the only one in the field, but that is not a valid reason to restrict others. We also mentioned that the opportunity to hunt is never a guarantee that one will be successful. One individual hunter who may not have been as successful as he or she was in the past is not at all an example that subsistence needs are not being met.

We urge the board not to set precedent by passing these proposals that would essentially use "competition" alone as the rationale for restrictions on NFQU. Without concrete evidence that subsistence needs are not being met because non-locals are allowed to hunt during the same period as locals, these proposals should be voted down.

Thank you board members for your attention to our comments.

Sincerely,

Mark Richards

Executive Director Resident Hunters of Alaska

[www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)

WP24-06 Executive Summary	
<b>General Description</b>	Wildlife Proposal WP24-06 requests to close the Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Urey to deer hunting by non-federally qualified users from Nov. 1-15. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Unit 4 Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31</i> <span style="float: right;"><i>Aug. 1 – Jan. 31</i></span></p> <p><b><i>Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray are closed to deer hunting Nov. 1-15, except by federally qualified subsistence users hunting under these regulations.</i></b></p>
<b>OSM Preliminary Conclusion</b>	<b>Oppose</b>
<b>OSM Conclusion</b>	<b>Support with modification</b> to reduce the proposed closure period from November 1-15 to November 1-10.
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	<p><b>Support with modification</b> to reduce the proposed closure period from Nov. 1-15 to Nov. 1-10.</p> <p>OSM’s interpretation of the Council’s intent is:</p> <p><b>Unit 4 Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31</i> <span style="float: right;"><i>Aug. 1 – Jan. 31</i></span></p> <p><b><i>Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.</i></b></p>

<b>WP24-06 Executive Summary</b>	
<b>Interagency Staff Committee Comments</b>	<p>The ISC acknowledges the extensive effort made by the Southeast Alaska Subsistence Regional Advisory Council (Council) during both the 2022-2024 and the 2024-2026 Wildlife Regulatory Cycles to help federally qualified subsistence users meet their subsistence needs for deer in the Pelican area.</p> <p>Deer populations in Unit 4 are the highest in the state and closures are not needed for conservation reasons. The Council's justification for submitting WP24-06 focuses on the closure being necessary to continue subsistence uses due to competition and user conflict in the areas closer to Pelican. While reported harvest success by federally qualified subsistence users appears stable over the last decade based on quantitative harvest data, federally qualified subsistence users in the area report these data underestimate hunter effort and do not capture competition that affects their ability to harvest enough deer to meet their subsistence needs.</p> <p>The ISC recognizes the effort that the Council has put into providing a meaningful subsistence priority, while trying to reduce restrictions on non-federally qualified users as much as possible. Since submission of their first proposal for the 2022 regulatory cycle, the Council reduced the duration of their requested closure from 2.5 months to 15 days to the current Council recommendation of 10 days at the beginning of November and reduced the requested closure area to those areas closest to home and most utilized by Pelican residents.</p>
<b>ADF&amp;G Position</b>	<b>Oppose</b>
<b>Written Public Comments</b>	<b>48 Oppose</b>



## STAFF ANALYSIS

### WP24-06

#### ISSUES

Proposal WP24-06 was submitted by the Southeast Alaska Subsistence Regional Advisory Council (Southeast Council). The proponents request to close a portion of northwest Chichagof Island around Pelican to deer hunting by non-federally qualified users (NFQUs) from Nov. 1-15 (see **Figure 1**). The specific closure area would include Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Urey (see **Figure 2**). This proposed closure area encompasses parts of Wildlife Analysis Areas (WAAs) 3417, 3418, 3419, and 3421.

#### DISCUSSION

The proponents submitted WP24-06 to establish a meaningful preference for the continuation of subsistence uses of deer by federally qualified subsistence users (FQSUs) in the Pelican area. Pelican residents depend on deer as a key component of their subsistence way of life. However, the proponents assert that residents in this area have been experiencing difficulties harvesting enough deer to meet their subsistence needs because of increasing competition and user conflict with non-federally qualified users (NFQUs). The proponents assert that NFQUs anchor boats in small bays, often inhibiting access to subsistence users' primary hunting areas. The proponents note that NFQUs may also decrease the success rates of subsistence users if they shoot at deer and miss, causing deer to become more skittish and wary of hunter presence.

The proponents explain that high fuel costs, depressed economies, small boats, and inclement weather are all impacting the ability of Pelican residents to meet their subsistence needs. Pelican residents cannot afford to have unsuccessful deer hunts, or to travel far from their community to hunt deer. NFQUs exacerbate these concerns by obstructing access, competing for deer, and potentially altering deer behavior, all of which decrease the chances of successful subsistence hunts and hinder the continuation of subsistence uses.

Subsistence livelihoods require effective and efficient harvests. The proponents note that the proposed two-week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons. First, the deer are still fat, providing the highest quality and amount of meat. Second, the deer are in rut, making them more susceptible to harvest. Third, weather conditions are typically favorable for hunting and proper meat processing.

The proponents assert that this two-week closure would allow for the continuation of subsistence uses and provide a meaningful subsistence preference, enhancing opportunity for subsistence users and helping them meet their subsistence needs by reducing competition and improving access to hunting areas during the most important time of year for subsistence deer hunting. Additionally, the proponents note that the proposed closure area is limited in scope but represents the area most hunted by Pelican residents. The proponents state that this closure will have a relatively small impact on NFQUs who

would maintain significant time and space to hunt deer in Unit 4, but the closure would greatly benefit local subsistence users.

The proponents also acknowledge that while tidelands are State managed lands, unaffected by any Federal closures, this should not decrease the effectiveness or necessity of this proposed closure. Deer are primarily pushed to beaches by heavy snowfalls, which usually occur after the requested closure period. Additionally, much of the proposed closure area is extremely steep and does not contain many beaches. Lastly, the proponents assert that when deer are on beaches, they are usually feeding above the mean high tide line, which is under Federal jurisdiction.

### **Existing Federal Regulation**

#### **Unit 4 - Deer**

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

### **Proposed Federal Regulation**

#### **Unit 4 - Deer**

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

***Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray are closed to deer hunting Nov. 1-15, except by federally qualified subsistence users hunting under these regulations.***

### **Existing State Regulation**

#### **Unit 4 - Deer**

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

<i>Residents - 3 deer total</i>	<i>Bucks</i>	<i>Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>Sept. 15 - Dec. 31</i>
<i>Nonresidents – 2 Bucks</i>	<i>Bucks</i>	<i>Aug. 1 – Dec. 31</i>

**Unit 4 - Deer***Remainder*

<i>Residents - 6 deer total</i>	<i>Bucks</i>	<i>Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>Sept. 15 – Dec. 31</i>
<i>Nonresidents – 2 Bucks</i>	<i>Bucks</i>	<i>Aug. 1 – Dec. 31</i>

**Extent of Federal Public Lands/Waters**

Unit 4 is comprised of approximately 96% Federal Public Lands, of which of 99% are U.S. Forest Service (USFS) managed lands, and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (Error! Reference source not found.). Unit 4 consists primarily of Admiralty, Baranof, and Chichagof Islands, along with some smaller adjacent islands. The proposed closure area is approximately 218 square miles in size, and it encompasses parts of Wildlife Analysis Areas (WAAs) 3417, 3418, 3419, and 3421 on northwestern Chichagof Island (see **Figure 2**).

**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.



**Figure 1.** Unit 4 Map with Proposal Analysis Area Encircled in Red.



**Figure 2.** Proposed Closure Area in relation to Pelican and Wildlife Analysis Areas 3417, 3418, 3419, and 3421 (For Informational Purposes Only).



## Regulatory History

Except for the 1992/93 and 1993/94 regulatory years, the Federal season for deer in Unit 4 has been from August 1 to January 31, with a harvest limit of six deer. However, harvest of antlerless deer has only been permitted from September 15 to January 31. In 1992, in response to several deep snow winters, the northern Baranof Island area harvest limit was reduced to four deer, the season was shortened to December 31, and the area closed to non-federally qualified users (NFQUs). In 1993, the northeast Chichagof Island area was closed to the harvest of deer by NFQUs after November 1 (OSM 2022a).

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

In 2000, two proposals addressing Unit 4 deer regulations were submitted by members of the public during the Federal wildlife regulatory cycle (WP00-08 and -09). These proposals were motivated by conservation concerns following heavy snow winters during the 1998-1999 season, the increased winter deer mortality typically associated with heavy snows, decreased deer habitat due to recent logging in the area, and increasing hunting pressure enabled by logging road construction (OSM 2000). One proposal requested to rescind the January Federal deer season in Unit 4, while the other requested to rescind the January deer season and reduce the harvest limit from six deer to four deer. Both proposals were rejected by the Federal Subsistence Board (Board), consistent with the recommendations of the Southeast Council. The stated justification was that the available deer population and harvest survey data for Unit 4 did not indicate a conservation concern, and that the proposed changes would unnecessarily restrict subsistence opportunity (FSB 2000).

In 2010, three proposals addressing Unit 4 deer regulations were submitted during the Federal wildlife regulatory cycle (WP10-13, -14, and -21). These proposals were submitted following significant deer population declines that occurred during the deep snow winters of 2006 through 2009. WP10-13 was submitted by the Southeast Council, requesting to close the female deer season on January 15 in that portion of Unit 4 draining into Chatham Strait, Peril Strait, and Icy Strait, including Tenakee Inlet. WP10-14 was submitted by the Southeast Council, requesting to close Federal public lands in the Northeast Chichagof Controlled Use Area (NECCUA) to the harvest of female deer by NFQUs in December. WP10-21 was submitted by the Southeast Council, requesting that deer harvest on the Federal public lands of the NECCUA be restricted to residents of Hoonah. None of these proposals were adopted by the Board. Instead, Federal and State managers closed the female deer season in the NECCUA for the 2010 regulatory year, and part of the 2011 and 2012 regulatory years. These closures were enacted to help the deer population recover from the deep-snow winters of 2006 through 2009.

In 2012, one proposal concerning Unit 4 deer regulations was submitted during the Federal wildlife regulatory cycle (WP12-06). This proposal sought to address population concerns following the deep snow winters of 2006 through 2009, by rescinding the January deer season in Unit 4. The Board rejected this proposal because it was determined that rescinding the January season would unnecessarily restrict subsistence users, while providing little conservation benefit (FSB 2012). Based on available survey and harvest data, Federal and State managers believed that the Unit 4 deer population had completely recovered from the previous deep-snow winters by the 2013 season (OSM 2022a).

In 2019, the Alaska Board of Game (BOG) adopted Proposal 18, increasing the State general season harvest limit from four deer to six deer in Unit 4 Remainder. The stated justification was that additional sustainable harvest opportunity could be provided because there were no conservation concerns.

In 2022, four proposals (WP22-07, -08, -09, -10) concerning Unit 4 deer regulations were submitted during the Federal wildlife regulatory cycle. WP22-07 was submitted by the Southeast Council, requesting that the Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner be closed to deer hunting September 15 through November 30, except by federally qualified subsistence users (FQSUs). WP22-08 was also submitted by the Southeast Council, requesting that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for NFQUs be reduced to two male deer. These two proposals were originally motivated by conservation concerns for the local deer population and an effort to prevent further depletion of the population by reducing hunting pressure from NFQUs (OSM 2022b). The proponents asserted that this change would also help increase harvest opportunity for FQSUs in these areas (OSM 2022a, 2022b).

WP22-09 and WP22-10 both proposed changes to deer hunting regulations in the area in and around Pelican. WP22-09 was submitted by the Southeast Council, requesting that the Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) be closed to deer hunting October 15 through December 31, except by FQSUs. Like WP22-07 and WP22-08, WP22-09 was originally motivated by conservation concerns and an effort to protect local deer populations from further depletion by reducing hunting pressure from NFQUs. The proponents asserted that this change would also help increase harvest opportunity for FQSUs in the area (OSM 2022c). The current proposal, WP24-06, is most similar to WP22-09 in that it requests a closure to deer hunting by NFQUs in the same general area in and around Pelican. However, the length of the closure requested under WP24-06 is approximately two months shorter than that previously requested under WP22-09. Further, as stated in the discussion section, WP24-06 is primarily motivated by concerns that high levels of competition from non-local hunters in the proposal area are posing a threat to the continuation of subsistence for local FQSUs.

WP22-10 was submitted by Patricia Phillips of Pelican as an effort to help local FQSUs better meet their deer harvest needs, while avoiding a full closure to NFQUs in the Pelican area (OSM 2022d). This proposal requested that the deer harvest limit for NFQUs in Lisianski Inlet and Lisianski Strait be reduced to 4 deer. The stated intent of WP22-10 was to reduce deer hunting pressure, provide for a meaningful subsistence priority, and thereby increase the ability of FQSUs to meet their subsistence needs (OSM 2022d).



At its April 2022 meeting, the Board rejected WP22-09 as part of the consensus agenda. The Board deferred Proposals WP22-07, -08, and -10 to its winter 2023 regulatory meeting, requesting the various user groups in the area work together to create more mutually acceptable solutions to the issues surrounding deer harvest in Unit 4 (FSB 2022).

The Office of Subsistence Management (OSM) subsequently organized an open public meeting regarding the deferred Unit 4 deer proposals in August 2022. The meeting provided an opportunity for different user groups to discuss their recent deer hunting experiences in Unit 4, their plans for future harvest, and how the proposals might impact them. Additionally, participants were asked if they had specific recommendations on these proposals or if they had any other suggestions for the Board that would help resolve these issues (OSM 2022a).

The Southeast Council modified its recommendations for WP22-07 and WP22-10 following deferral and open meeting discussion. At its fall 2022 meeting, the Southeast Council supported WP22-07 with modification to remove Wildlife Analysis Areas (WAAs) 4043, 4044, and 4054 from the proposal area and create a harvest limit for NFQUs of two male deer within the remaining area (WAAs 4041, 4042, 4055) (OSM 2022a). This modification reduced the proposal area to roughly half of its original size and allowed for some harvest by NFQUs in the remaining proposal area (SERAC 2021b). This modification was recommended to focus the proposal on the area most utilized by FQSUs and to reduce the potential impact of the proposal on NFQUs (SERAC 2021b).

At the same meeting, The Southeast Council supported WP22-10 with modification to reduce the harvest limit for NFQUs to two male deer, and to maintain the same proposal area as recommended in Fall 2021. This modification was recommended because it was suggested that a harvest limit reduction of four deer or three male deer would not provide a significant conservation benefit or substantially enhance the success rates of FQSUs, but that the situation in the Northwest Chichagof might not warrant a full closure to NFQUs (SERAC 2021b). The Pelican Fish and Game Advisory Committee also voted to support a two male deer harvest limit for NFQUs hunting in the Pelican area (PFGAC 2022, SERAC 2021b). The Southeast Council also felt that reducing the harvest limit to two male deer for NFQUs would reduce administrative complexity and enforcement issues by aligning the proposed harvest limit reduction for the Northwest Chichagof area (WP22-10) with that of the Northeast Chichagof area (WP22-08) and Southwest Admiralty Island (WP22-07) (SERAC 2022b). The Southeast Council retained its original Fall 2021 recommendation of support for WP22-08 without modification, to reduce the harvest limit for NFQUs hunting in the NECCUA to two male deer (OSM 2022b). The Southeast Council noted that all three proposals were still intended to help protect local deer populations from further depletion by reducing hunting pressure from NFQUs, and thereby increase harvest opportunity and provide for a meaningful subsistence preference for FQSUs in these areas (OSM 2022a, 2022b, 2022c).

All three proposals (WP22-07, -08, and -10) were subsequently rejected by the Board at its February 2023 regulatory meeting (FSB 2023). The stated justification was that the available data on deer populations in Unit 4 did not meet the criteria necessary to close land or implement harvest restrictions for the purposes of conservation or the continuance of subsistence uses under §815(3) of ANILCA (FSB

2023). Recent ADF&G survey and harvest data indicated that overall deer populations in Unit 4 were among the highest in the State and that FQSUs in these areas were generally effective and efficient deer harvesters (FSB 2023). However, the Board member from the Bureau of Indian Affairs dissented on the basis that local ecological knowledge and testimony had been provided through the regulatory process, which indicated that FQSUs were having difficulty harvesting sufficient deer in the areas covered by the proposals (FSB 2023).

### Recent State Regulatory History

BOG Proposals 10 and 11 were submitted in 2022, requesting to reduce the deer harvest limit for residents and nonresidents to four deer in Unit 4 Remainder. The proponents for both proposals listed the possible closure of Federal lands to deer hunting by NFQUs as a factor in submitting their proposals. Both proponents suggested that a harvest limit reduction would protect deer populations, help reduce user conflicts in Unit 4, and avoid a closure of Federal public lands to NFQUs. The Pelican Fish and Game Advisory Committee voted to unanimously support State Proposals 10 and 11 at their December 15, 2022, meeting (PFGAC 2022). In their justification for supporting Proposal 11, the Pelican Fish and Game Advisory Committee noted that the proponent provided a clear justification and reasonable observations. The Committee explained that deer in Lisianski Inlet and Lisianski Strait are wary to increased vessel traffic. There are more deer on the outer coast away from Pelican, and less snow in November tends to keep the deer out of the beach fringe (PFGAC 2022: 2).

The BOG acted on Proposals 10 and 11 at their January 2023 Southeast Region regulatory meeting (ADF&G 2022a). The BOG adopted Proposal 10, with modification to reduce the nonresident harvest limit throughout all of Unit 4 to two male deer (ADF&G 2023a). The resident harvest limit remained three deer in Unit 4, Chichagof Island east of Port Frederick and north of Tenakee Inlet, and six deer in Unit 4 Remainder. The BOG took no action on Proposal 11, due to the action taken on Proposal 10.

### **Current Events**

Two other proposals concerning deer regulations in Unit 4 were submitted for the 2024 Federal subsistence wildlife regulatory cycle. WP24-04 was submitted by the Southeast Council, requesting to close a portion of Admiralty Island around Angoon to deer hunting by NFQUs, from November 1-15. WP24-05 was submitted by the Southeast Council, requesting to close the Northeast Chichagof Controlled Use Area (NECCUA) surrounding Hoonah to deer harvest by NFQUs from November 1-15.

The Hoonah Indian Association received funding through the USFS Southeast Alaska Sustainability Strategy program to collect community harvest and biological information about deer on the north end of Chichagof Island from 2022-2027. This project is being carried out in the communities of Hoonah, Pelican, Gustavus, and Angoon. A North Unit 4 Deer Working Group has also been established under the guidance of the Hoonah Indian Association Environmental Programs (HIA Environmental 2023a). The first meeting of this group was held on March 15, 2023. Preliminary information from HIA subsistence surveys and the deer working group has been integrated into the analyses for WP24-05 and WP24-06. HIA was not able to conduct surveys in Angoon.

At its fall 2023 meeting, The Southeast Council voted to support the current proposal (WP24-06) with modification to reduce the proposed closure period from November 1-15 to November 1-10 (SERAC 2023). The Council felt this action was necessary to support the continuation of subsistence uses in this area, while also causing the least possible impact to non-federally qualified users (SERAC 2023).

### **Biological Background**

Sitka black-tailed deer spend the winter and early spring at low elevation where less snow accumulates, and forests provide increased foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet the energetic needs of lactating does. Migratory deer follow the greening vegetation up to alpine for the summer. Resident deer remain at lower elevations. The breeding season, or rut, generally occurs in October through November, and peaks in late November (ADF&G 2009). Wolves and black bears are not present in Unit 4, so their primary predators in the area are humans and brown bears. Brown bears are estimated to kill an amount of deer equal to 15%-20% of the total annual deer harvested by hunters (Mooney 2009). Significant changes in deer populations and localized deer density levels are relatively normal over time in Unit 4 (Bethune 2020). Periodic declines are often attributable to severe winter weather, particularly deep snow events (Olson 1979, Bethune 2020). This issue is clearly illustrated in the regulatory history, and the frequency with which proposals to change Unit 4 deer hunting regulations follow heavy snow winters.

### **Habitat**

Unit 4, like most of Southeast Alaska, has a maritime climate characterized by high rainfall and moderate summer and winter temperatures (Bethune 2020). However, the amount of rain and snow received can vary significantly from year-to-year, and across the unit (Bethune 2020). The landscape of Unit 4 is characterized by steep and rugged terrain with mountains, fjords, estuaries, and short, swift rivers (Bethune 2020). Vegetative communities occurring at low to moderate elevations (<1,500 feet) “are dominated by western hemlock (*Tsuga heterophylla*) and Sitka spruce (*Picea sitchensis*), with western red cedar (*Thuja plicata*) and Alaskan yellow cedar (*Chamaecyparis nootkatensis*) old-growth forests. Mixed conifer muskeg and deciduous riparian forests are also common. Mountain hemlock (*Tsuga mertensiana*) comprises a subalpine timberline band between 1,500 - 2,500 feet in elevation” (Bethune 2020: 4).

Old-growth forests are considered primary deer winter range, in part because the complex canopy cover allows sufficient sunlight through for forage plants to grow but intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats (McCoy 2017). Some areas of Unit 4 have been significantly impacted by large-scale changes in habitat due to logging, while the habitat in other areas is largely intact. Areas with substantial timber harvest, such as northeastern Chichagof and northwestern Baranof Islands, are expected to have lower deer carrying capacity compared to pre-harvest conditions (Brinkman et al. 2009). Deer may shift their activity patterns in response to intensive logging and subsequent forest succession (Brinkman et al. 2009). The density of deer in these areas may decline as even-aged young-growth stands progress beyond shrub and

sapling stages to stem exclusion forests characterized by thick canopies and sparse understory browse (Brinkman et al. 2009: 39).

#### Unit 4 Deer Population Information

Monitoring deer populations in forested habitat is challenging, as the total number of deer cannot be directly counted through ground or aerial surveys (Brinkman et al. 2013). Changes in deer populations in Unit 4 have historically been monitored using three complementary methods: deer pellet surveys, harvest reporting, and aerial alpine surveys. Winter body condition and beach mortality surveys may also be conducted to understand changes in the health and abundance of area deer populations (Bethune 2020).

Deer pellet surveys have been used in the Southeast region since 1981 to monitor deer population trends and document substantial changes ( $\geq 30\%$ ) in deer density in specific watersheds (McCoy 2017). An average of  $<1.00$  pellet group per survey plot generally indicates a low-density deer population, an average of  $1.00 - 1.99$  pellet groups per survey plot indicates a moderate-density population, and an average of  $>2.00$  pellet groups per survey plot typically indicates a high-density population (Kirchoff and Pitcher 1988, Bethune 2022a). Deer pellet survey data, however, should be interpreted with caution, “as factors other than deer population size can affect deer pellet-group density” (McCoy 2017: 2). Issues such as winter severity and snowfall patterns, temperature and humidity, variability in survey effort, the length of time since the last survey, timing of vegetation green-up and changes in pellet group detectability, and changes in habitat can all impact pellet-group density and/or detection (McCoy 2017). A recent deer pellet study conducted by Brinkman and colleagues (2013) on Prince of Wales Island using DNA-based methods found that current ADF&G/USFS deer pellet survey techniques did not provide an accurate index of deer populations when extrapolated across time, or beyond the local scale. As the researchers explained:

Over the past three decades, ADF&G and USFS have used deer pellet counts as the primary tool to monitor deer population trends. Precise estimates of trends in deer abundance are needed because perceived fluctuations in the deer population size above or below a predetermined population objective set by ADF&G results in changes in harvest regulations. Despite heavy reliance on these data, pellet group counts of black-tailed deer were compared with an independent measure of [deer] population size only once. In that study, 13 radio-collared deer were introduced to a small (approx. 40 ha) island in southeast Alaska. Researchers returned to the island 264 days later and surveyed 1.9% of the island for pellet groups. Data from that study indicated that a pellet group density of  $0.05$  pellet groups/ $m^2$  represented  $12$  deer/ $km^2$  ( $95\%$  CI =  $10.7$  deer/ $km^2$  –  $13.8$  deer/ $km^2$ ). This estimate assumed constant pellet persistence, detection, and deposition rates. Unfortunately, data were obtained only during a single year, which prevented any evaluation of how well pellet groups deposited during winter tracked changes in deer population. Also, only 4 deer remained on the island (6 swam off and 3 died) when researchers returned to conduct pellet group counts, which complicated the association between deer numbers and number of pellet groups encountered. Moreover, the island was much smaller than typical deer home ranges (which likely concentrated deer activity) and habitat diversity was low when compared with typical deer ranges in southeast Alaska. Consequently, the usefulness of the study

for evaluating the reliability of pellet-group surveys as conducted by ADF&G and USFS personnel was limited (Brinkman et al. 2013: 445).

Brinkman and colleagues (2013) also noted that though their deer pellet index was not directly comparable to that developed by ADF&G/USFS because of different methodologies, their model suggested that a similar deer pellet density of 0.05 pellet groups/m<sup>2</sup> across a mosaic of habitat types on Prince of Wales Island would indicate a minimum deer count of 2.9 deer/ km<sup>2</sup>, with a much wider margin of error (95% CI = 0.4 deer/km<sup>2</sup> – 24.3 deer/km<sup>2</sup>). Previous pellet group count studies conducted outside of Alaska that demonstrated the usefulness of pellet-group counts were conducted under conditions that are difficult to replicate with unenclosed populations of deer in unmanaged landscapes (Brinkman et al 2013). The researchers concluded:

The variation we reported between estimates of pellet-group counts and deer counts at the transect level do not support the use of pellet-group count surveys to reliably monitor trends in deer populations at larger spatial scales. Indeed, during our study, pellet-group data aggregated within watersheds did not reflect the decline in deer count within those watersheds. For instance, in the Staney watershed, DNA results indicated a 24% decline in minimum deer count from 2006 to 2008, whereas pellet group counts indicated a 17% increase over the same years (Brinkman et al. 2013: 449).

Further, as Bethune (2022a: 6) notes:

Sitka black-tailed deer density estimates on old growth winter range vary widely (10 – 57 deer/km<sup>2</sup> or 26 – 148 deer/mi<sup>2</sup>). The most accurate deer estimates to date for Southeast Alaska come from Brinkman et al. (2011), who estimated density using a fecal DNA-based mark-recapture design on Prince of Wales Island. In addition, McCoy et al. (2014) also estimated density using fecal DNA with both mark-recapture and spatial mark-recapture models on northeastern Chichagof Island. Brinkman et al. (2011) estimated 12 deer/km<sup>2</sup> (31 deer/mi<sup>2</sup>) in unmanaged (unlogged) forest lands with a range of 8.5 – 17 deer/km<sup>2</sup> (22 – 44 deer/mi<sup>2</sup>) across all habitat types. McCoy et al. (2014) estimated densities ranging from 4.4 deer/km<sup>2</sup> (11.4 deer/mi<sup>2</sup>) to 11.9 deer/km<sup>2</sup> (30.8 deer/mi<sup>2</sup>) based on the year and analysis used. In comparison, Kirchhoff (1994) estimated an average density of 35.6 deer/km<sup>2</sup> (92 deer/mi<sup>2</sup>) based on pellet group counts. Density-estimate techniques using fecal DNA are some of the most advanced applications available to managers and can provide precise estimates; but they can be expensive, labor intensive, and results are only applicable to small areas.

#### Pelican Area Deer Population Information

There have been no recent deer pellet surveys conducted within the proposal area. The last deer pellet surveys conducted on Chichagof Island took place at Pavlof Bay in 2019 and Finger Mountain in 2018 (Bethune 2022a). The average pellet groups counted per plot for each of these surveys were 2.47 and 3.61 respectively, generally indicating a high-density deer population (Bethune 2022a). Recent pellet surveys conducted in other parts of Unit 4 have generally indicated increasing populations from prior years (McCoy 2019; Bethune 2020). As the ADF&G Regional Supervisor explained during a recent

Southeast Council meeting, “deer pellet densities in Game Management Unit 4, no matter where you do them, are always the highest in the region” (SERAC 2021b: 476). However, he did also note that “The Department does not monitor deer populations in these relatively small areas affected by the proposal. We monitor deer populations on a unit-wide level” (SERAC 2021b: 351). This statement, as well as the previously mentioned study by Brinkman and colleagues (2013), lends credence to local testimony presented at recent Southeast Council meetings that deer populations may not be tracked at a fine enough scale to capture periodic, localized declines (see SERAC 2021b). As a long-time Pelican resident cautioned:

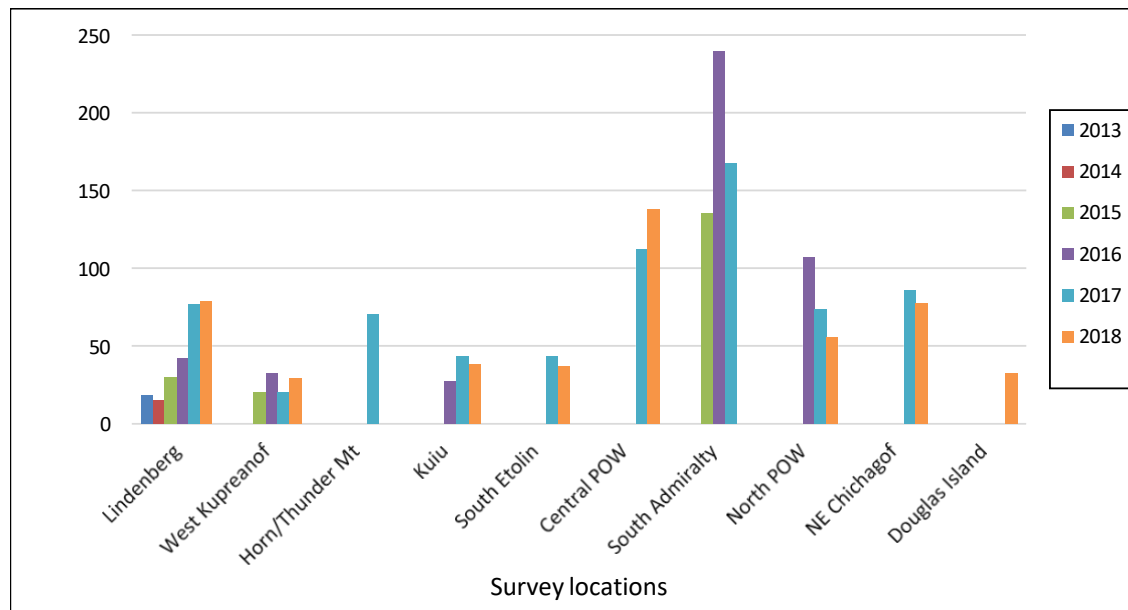
I’ve hunted in Game Management Unit 4 since 1993 and have been very aware of the deer population. I’ve always hunted the good time, between October 20<sup>th</sup> and November 24<sup>th</sup> or so, [around] Thanksgiving. And, I can witness there is a significant decrease in the population in the Pelican area. In 1998, as I would walk through my three acres, and the hillsides going up the hill to hunt, you would frequently see multiple [deer] droppings, multiple areas of droppings. Now, as I walk through three to eight acres of the area near Sunnyside, it’s hardly one dropping for every ten feet or two meters, and so you assume it’s the same deer. So, there is a significant decrease in the population in the [Lisianski] Inlet. I’m also familiar with areas outside the Inlet, and I’ve seen a larger population there [before], where we’ve seen herds of deer, seven or eight at a time [in the past], we’re seeing two or three [now]...I think the deer population in Lisianski Inlet is in danger of not being able to reproduce and keep the herd up (SERAC 2021b: 503).

Further, a Southeast Council member from Pelican explained that the characteristic topography and climatic conditions of the Pelican area make it different from other locations where deer pellet surveys are often conducted (SERAC 2023: 477):

I brought this to the attention of the RAC (Southeast Council) before, but the Lisianski Inlet area has its own microclimate. We have Brady Glacier on the other side of Cross Sound that sends down a lot of cold air. The Lisianski Straits area acts as a refrigerator where this cold air gets blocked in, so we get higher levels of snow and snow that stays longer, which impacts the survival of deer populations... Also, there are limited, small boat anchorages and there’s greater fragmentation of the landscape from landslides, wind blow downs, and just from the topography of the area. There are a lot of cliffs and it’s hard to, it’s impossible to, traverse across those locations. So, where you have alluvial fans, you’ll likely find deer populations. So, the deer population surveys [Unit 4 deer pellet surveys] are not specific to the conditions of Lisianski Inlet.

Aerial alpine deer survey work began in 2013, as an effort to provide a new, timelier method to assess and monitor the abundance of deer in alpine areas (Bethune 2020). These surveys are intended to be flown each summer before the hunting season, with deer seen per survey hour constituting the standard unit of measurement (Bethune 2020). As Bethune (2020: 25) notes, “The alpine survey technique appears to be a useful tool for gauging deer abundance immediately prior to hunting season. However, research is needed to learn more about what alpine surveys tell us about the larger deer population.”

The most recently published Unit 4 Deer Management Plan does not show that aerial alpine surveys have been conducted over the proposal area (Bethune 2022a). Recent surveys were flown over Southern Admiralty Island in 2016 and 2017, and Northeast Chichagof Island in 2017 and 2018 (Bethune 2022a). Southern Admiralty Island exhibited the highest deer seen per hour of any survey location in Southeast Alaska, while Northeast Chichagof exhibited numbers similar to north Prince of Wales Island (POW) (see **Figure 3**). Aerial surveys were not conducted in 2019 and 2020 due to COVID-19 restrictions (Bethune 2022a).



**Figure 3.** Average Number of Deer Counted per Hour during Mid-Summer Aerial Alpine Surveys in Southeast Alaska, 2013 – 2018 (Bethune 2022a).

Annual harvest data estimated from harvest reports can also provide another indicator of deer population status, and potential change over time (Bethune 2022a). The most recently estimated five-year average (2016-2020) for all reported harvests in Unit 4 was approximately 5,742 deer per year (see **Table 1**). During this time, the greatest amount of harvest took place on Chichagof Island, followed by Baranof Island and Admiralty Island (Bethune 2022a). The total estimated per year harvest average during this period was very similar to the average of 5,674 deer harvested each year during the previous five-year reporting period from 2011-2015 (**Table 1**). The greatest amount of harvest during the 2011-2015 reporting period also took place on Chichagof Island, followed by Baranof Island and Admiralty Island (Bethune 2020). The average number of all hunters hunting in Unit 4 each year increased slightly between these five-year reporting periods (+4%), while the average number of total hunter days per year decreased slightly (-3%) (**Table 1**). Still, the harvest levels estimated for the two most recent five-year reporting periods (2011-2015 & 2016-2020) are substantially lower than those estimated for the 2001-2005 reporting period (**Table 1**). Yet, the estimated average number of hunters hunting each year during these three reporting periods (2011-2005; 2011-2015; 2016-2020) is quite similar (**Table 1**).



**Table 1.** Estimated Total Harvests and Hunting Effort in Unit 4 during Recent Five-Year Reporting Periods (ADF&G 2005-2006, 2006-2007; Mooney 2007, 2009, 2011, 2015; Bethune 2020, 2022a).

<b>Year</b>	<b>Total Hunters</b>	<b>Total Hunter Days</b>	<b>Total Harvests in Unit 4</b>
2001	3581	-	7457
2002	3414	-	5117
2003	3637	-	7621
2004	3363	-	6787
2005	3166	-	6983
<b>5 Year Average</b>	<b>3432</b>	<b>-</b>	<b>6793</b>
2006	3057	-	7741
2007	1999	-	1846
2008	2378	-	3855
2009	2280	-	3909
2010	2709	-	4688
<b>5 Year Average</b>	<b>2485</b>	<b>-</b>	<b>4408</b>
2011	3157	14020	6909
2012	3103	12214	4853
2013	3248	13094	5409
2014	3435	13815	4694
2015	3733	15183	6505
<b>5 Year Average</b>	<b>3335</b>	<b>13665</b>	<b>5674</b>
2016	3742	14535	7192
2017	3478	12555	5255
2018	3449	13425	5229
2019	3382	12870	5979
2020	3252	12712	5055
<b>5 Year Average</b>	<b>3461</b>	<b>13219</b>	<b>5742</b>
<b>Overall Average</b>	<b>3178</b>	<b>13442</b>	<b>5654</b>

Recently reported five-year harvest and hunting efforts in the wildlife analysis areas encompassed by the proposal area follow somewhat different trends. This issue is discussed in detail in the harvest history section of the analysis because it is important to consider in light of the proponents' statements about increased competition impacting Pelican residents and other FQSUs' deer hunting efforts in the proposal area.

Based on the combination of harvest data, pellet survey data, aerial surveys, and related information, managers in the area assert that the overall deer population in Unit 4 has recovered from the population declines suffered during the severe winters of 2006-2008, and it may be reaching winter carrying

capacity in some areas (Bethune 2022a). Most recently, the heavy snowfall that took place in December 2021 led to concerns about over-winter mortality. However, the rest of the 2021-2022 winter exhibited mild to average weather conditions and the mortality surveys conducted in the spring of 2022 found that over-winter mortality was not higher than normal, and that the body condition of live deer was similar to that seen in previous years (Bethune 2022b).

### Cultural Knowledge and Traditional Practices

Pelican is located near the northwest coast of Chichagof Island, in Lisianski Inlet. It is approximately one-hundred miles west of Juneau, and eighty miles north of Sitka. Pelican began as a commercial fishing and processing town, when a fish buyer from Sitka began buying fish in the area and chose the protected inlet as an ideal site for a cold storage plant (ADCCED 2023). The fish buyer decided to name the site after his fish packing vessel, “The Pelican,” and a community soon grew around this operation (ADCCED 2023). A school and fish cannery were created in the 1940s, and the city of Pelican was officially incorporated in 1943 (ADCCED 2023). At its peak, the cold storage plant processed over five million pounds of salmon and halibut annually (ADCCED 2023). The commercial fishing fleet was made up mostly of family boats, and Pelican was a thriving fishing community until the 1990s (Schroeder and Kookesh 1990, ADLWD 2022). Unfortunately, the fishing industry began a significant decline at this time, which culminated with the closing of the fish processing plant in 2009 (ADCCED 2023, ADLWD 2022). Though fishing is still a key aspect of the culture in this community, the commercial fishing industry is not as strong it was previously (ADCCED 2023). The downturn in the commercial fishing industry has likely played a key role in the decline in Pelican’s population, which also started in the 1990s, as people moved to other communities in search of employment and income (see **Table 2**, ADCCED 2023). A Pelican resident recently explained that commercial fishing opportunities, such as longlining for halibut and black cod, have been decreasing and that many people left the community when Pelican Seafoods shutdown (SERAC 2021a: 81). This situation is similar to that being experienced by many smaller, rural communities in southeast Alaska (Sill and Koster 2017). Pelican has worked to diversify its economy in recent years and has significantly increased its efforts in the tourism industry (ADCCED 2023). The community experiences a regular influx of seasonal residents and commercial fishermen each year (ADCCED 2023, OSM 2022d).

**Table 2.** The population of Pelican from 1940 to 2020 based on US Census Data (ADCCED 2023).

Year	1940	1950	1960	1970	1980	1990	2000	2010	2020	2021	2022
Population	48	180	135	133	180	222	163	88	98	92	83

In 2020, there were 98 full-time residents living in 23 households in Pelican (US Census 2020a). This population number was slightly higher than that estimated for 2010, but well below the peak reached in 1990 (**Table 2**). The median age of Pelican residents in 2020 was approximately 48, about 13 years older than the median age for all Alaskan residents (US Census 2020a). Pelican also had a significantly larger proportion of residents 65 and older (21%), when compared to the median figure for the entire state (13%) (US Census 2020a). The employment rate in Pelican was roughly 66%, about 8% higher than the median employment rate across the state (US Census 2020a). The estimated median income for Pelican households was \$52,188 in 2020 (US Census 2020b). This was about \$25,500 less than the median

household income for Alaska overall in 2020 (US Census 2020a). The primary employment sectors in Pelican in 2020 were public administration/government (28%); agriculture, forestry, fishing, and hunting (28%); transportation, warehousing, and utilities (23%); and education, healthcare, and social work (21%) (US Census 2020b). This socioeconomic information for Pelican in 2020 is compared to that of the previous two US Census periods in **Table 3** below.

**Table 3.** Pelican Socioeconomic Statistics for 2000, 2010, and 2020 (US Census 2000, 2010, 2020a, 2020b)

Year	Population	Median Age	Percent of Population 65+	Median Household Income	Employment Rate	Family Poverty Rate	Households Qualified for SNAP
2000	163	41	11%	\$48,750	64%	n/a	n/a
2010	88	54	17%	\$44,750	49%	n/a	n/a
2020	98	48	21%	\$52,188	66%	n/a	n/a

Most residents of Pelican rely on subsistence resources both as key sources of livelihood and a primary basis for their overall way of life (OSM 2022d). Proposals to provide for a meaningful subsistence priority against increased hunting competition should be approached with this in mind (SERAC 2023). Deer have been a key subsistence resource utilized by Pelican residents for many years (OSM 2022d, SERAC 2021a), and generally represent the most significant terrestrial source of meat for rural residents of southeast Alaska (Brinkman et al. 2009, SERAC 2023). Pelican residents participated in a baseline household subsistence survey documenting their harvest and use of deer and other wild resources in 1987 (ADF&G 2023b). There have been no other comprehensive subsistence studies of Pelican conducted since this time, but a new subsistence study of Pelican is scheduled to be carried out by ADF&G during the winter of 2023 (Sill 2023). Still, the data provided in the 1987 baseline study compares favorably to subsistence studies conducted in nearby Unit 4 communities around the same time (Leghorn and Kookesh 1987, Schroeder and Kookesh 1990). Ninety-one percent of Pelican households were shown to use deer, and deer ranked as the second most important resource in terms of bulk contribution to subsistence, trailing only non-salmon fish at the time (see **Table 4**). This study also illustrated the cultural importance of reciprocity and sharing of subsistence resources within the community, as sharing of subsistence resources and knowledge promotes sociality and future harvest success, while preventing potential wastage when subsistence foods are harvested in abundance (**Table 4**, Langdon and Worl 1981, Langdon 2021). The role of sharing to distribute subsistence-caught food within communities, and its contribution to peoples' survival over the generations has been described in detail by area residents during previous Southeast Council meetings, and more recent subsistence studies conducted in nearby communities (SERAC 2009, 2010, 2021a; Sill and Koster 2017). Though 91% of Pelican households reported using deer, a smaller percentage (63%) reported harvesting deer (**Table 4**). This data conforms to findings from subsistence studies conducted in many other rural Alaskan communities, where a smaller proportion of households often harvest a larger percentage of local subsistence resources, which they share or trade with other households (Wolfe and Ellana 1983; Wolfe and Walker 1987).

**Table 4.** Average Harvest, Use, and Sharing of Deer by Pelican Households in 1987 Baseline Subsistence Study (ADF&G 2023b).

	Estimated Values for 1987
Population of Pelican	239
Percentage of Households Using Deer	91%
Percentage of Households Harvesting Deer	63%
Percentage of Households Giving Deer	45%
Percentage of Households Receiving Deer	59%
Total Deer Harvested	316
Average Harvest per Household (lbs.)	307
Average Harvest per Capita (lbs.)	105
Deer Rank in Contribution to Subsistence	2nd

In Pelican, as in similar Unit 4 communities, deer hunting strategies align with the species' yearly lifecycle (OSM 2022d). Fawns are born in late spring in trees edging muskeg or beach. In summer, deer move into the alpine areas until the fall when they enter mature forests. During winter, deer live in the forest below the snow line until heavy snows drive them down to the beaches where the forest fringe keeps the ground relatively snow free. Accordingly, there are three different hunting strategies that are associated with specific seasons, weather, geographical locations, and deer behavior in this area (George and Kookesh 1982). These strategies are broadly described as the Alpine Hunt, the Muskeg and Forest Hunt, and the Beach Hunt (George and Kookesh 1982). However, due to the generally steep and rugged landscape in Unit 4, beach and low elevation hunting is a preferred strategy (George and Kookesh 1982). Boats are used extensively to facilitate deer hunting trips to destinations that are reached along the marine passages from Pelican (SERAC 2021b). As a Southeast council member from Pelican explained at a recent council meeting (SERAC 2021: 523, see also SERAC 2023: 479):

As was stated by a number of people, actually [people on] both sides of this proposal, Lisianski Inlet has limited access to hunting. This is due to the geography here. We have very steep mountains with intermittent watersheds. So, these watersheds, although there's an extensive coastline, these watersheds provide the access to hunting areas. It doesn't take more than a few boats in these areas to clog up, or to essentially clog up the watersheds with hunters, especially if there's two or three boats with several hunters each dropping guys off at these different beaches. There's not that many beaches and access ways up there. And it's a further deterrent when people, you know a boat went up there and you don't know what beaches they're at, there's only four or five beaches, or watersheds to go up, and you know that there's a group of hunters up there, you almost -- you can't go to that whole area and this effect can last multiple days...Safety is also a concern. When there's that many people and you have to try to follow someone up a watershed, and you don't know they're there, you don't feel quite safe about it.

Still, these hunting trips become particularly important during the deer rut in October and November, as food security can also become a problem around this time (SERAC 2021a, 2021b; **Table 5**). The State deer hunting season in the proposal area runs from August through December. Subsistence users hunting under Federal regulations are permitted to harvest deer from August through January. Overall, most

harvest in Unit 4 occurs later in the season, as snow forces deer to lower elevations where they are easier to harvest (OSM 2022d). Nearly half (45%) of the harvest in Unit 4 occurs during the month of November; and 67% occurs from September through November (see **Table 5**). The ability for FQSUs to hunt in January appears to be useful in times of necessity or opportunistic encounters, but it does not appear to be a preferred hunting period due to the relatively poor condition of deer and the severity of weather typically associated with this time of the season (**Table 5**, SERAC 2023b). As ADF&G notes in their comments on this proposal, January was the least hunted month for Pelican residents, accounting for approximately 1% of Pelican residents' reported hunting days and 2% of their reported deer harvests from 2013 to 2022. Similarly, Patricia Phillips, mayor of Pelican, Chairman of the Pelican Fish and Game Advisory Committee, and member of the Southeast Council noted at a recent Board meeting, "The citizens of Pelican are limited in the times that they can go out and harvest [deer] because of the weather, and traditionally a lot of the harvest of deer [in Pelican] comes during the rut, which happens to be in October and November. And it's kind of a secret that became known and so we see a greater influx of non-federally qualified and federally qualified hunters coming to our area to utilize this method of, you know, hunting deer in the rut" (FSB 2023: 457). As Jim Slater, a Southeast Council member from Pelican explained, this influx of users during the rut has created local concerns about deer hunting competition:

I did talk to a number of year-round residents here who I knew had concerns about subsistence hunting opportunities...Hunting competition was the number one concern amongst the residents that I talked to. Most or many confirmed that they've seen an increase of hunting pressure from hunters coming from outside the area and this correlated to a more difficult time in them obtaining their sufficient subsistence animals" (SERAC 2021b: 522).

According to the preliminary results of a small sample survey (14 respondents) conducted on deer hunting and subsistence issues in Pelican by the Hoonah Indian Association Environmental Programs from 2022 to 2023, deer abundance was the most frequently reported issue of concern for local harvesters (64%), followed by the expenses associated with hunting (57%), and hunting competition (50%) (HIA Environmental 2023b). Still, these concerns could be interrelated, as survey respondents noted that competition in the Pelican area impacted deer abundance, access to preferred hunting areas, the general difficulty of hunting, and hunter safety (HIA Environmental 2023b). Roughly half of the suggestions offered by survey respondents to help address the issue of competition involved efforts to better monitor, enforce, and/or reduce the number of deer harvested by non-local hunters in the Pelican area (HIA Environmental 2023b).

**Table 5.** Percentage of Unit 4 deer harvest by month and user type, 2000-2019 (ADF&G 2021).

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

During the previous wildlife cycle (2022), several Pelican residents expressed concerns that proposals to implement closures or reduce harvest limits for NFQUs in the proposal area would pit full-time residents against seasonal residents and others with long-term ties to the community who had moved away for work (SERAC 2021b). However, as one Pelican resident explained (SERAC 2021b: 76-77):

I am a full-time resident of Pelican, Alaska. I hunt black-tailed deer yearly. I work year-round in Pelican also. And I witness and experience first-hand the negative impact that unrestricted tourism is taking on this town and community. I support WP22-09 and -10 as a starting point to slowing or stopping future resource exploitation in this area. Decreasing the bag limit and restricting allowable hunting times can help discourage those who would choose to hunt here for sport. Regular regional hunters who come here for food or subsistence should be capable of changing their schedule to accommodate the proposed hunting period change. WP22-09 does not close hunting, it just restricts the timeline. The Pelican community, we've been accommodating tourism and the part-time residents here for decades much to its slowed detriment. I think it's time for a change, that's just my opinion.

Many opponents to these proposals will argue that there's no current interest in sport hunting for wintertime black-tail deer in Lisianski Inlet and Straits. However, as I previously mentioned, the intense expansion on tourism centralized in Pelican definitely indicates otherwise. At the 9/7/21 meeting of the Pelican ADF&G Regional Advisory Committee, less than half of the attending Council and community members represented full-time residents of Pelican and its surrounding area. Most of them were part-time residents. Our tiny, year-round population is outnumbered in voice for what regulations are discussed and/or determined in our area.

More recently, Southeast Council member Phillips acknowledged (SERAC 2023: 476-478):

So, this topic of closure began on March 17th, 2021, and there were several qualified rural residents of Pelican who called into the Southeast RAC's winter meeting and their primary concern...was that deer is the main source of meat and there's outside pressure affecting their ability to meet their subsistence needs and the effects of the high cost of fuel has decreased the amount of trips they can go out to do their harvest... Previously, I indicated, you know, that I was concerned about this issue of family members now longer residing in Pelican and residing in nonrural communities. But, since then, I've realized that my charge as a Southeast RAC member is for the continuation of subsistence resources and how can I best do that? So, I have to represent those voices that came to this RAC saying that their subsistence needs aren't being met... This proposal [WP22-09], you know, it was [initially] an October, November, and December closure for non-federally qualified users, and now this proposal [WP24-06] that we're talking about is a ten-day closure. So, I think we've listened to the voice of the non-federally qualified hunters [too].

The cost of living in Pelican is high, like that of many similar communities in Unit 4, and many residents' incomes are limited (SERAC 2021b). Successful subsistence hunting and fishing is key to local livelihoods in these communities (SERAC 2021a). Though the deer population appears to be

healthy on a game management wide level and close to carrying capacity in some parts of Unit 4, the proponents and other residents of Unit 4 have noted localized declines in deer populations in recent years, which have exacerbated issues of competition and conflict between different user groups in the Pelican area (SERAC 2021a, 2021b; FSB 2023). Residents have also suggested that deer populations within Unit 4 may not be tracked at a fine enough scale to consistently capture localized depletions, and that hunter effort and harvest reporting data tends to underestimate the amount of hunting effort taking place, and overestimate hunting success rates. (SERAC 2021a, 2021b; FSB 2023). As one Pelican resident explained:

I've lived in Pelican coming up on 30 years... Last year [2020], I shot one deer. And, my wife, my daughter, and I live on one fixed income, and we depend on our fish and our deer to eat. We have one ferry a month, if we're lucky. Alaska Sea Planes charges one dollar a pound [for shipping food]. We can't afford to go and buy the expensive beef and expensive food. Lately we've been going without food, and the increased [hunting] pressure in this area, along with the pressure of the bears has just totally hindered our hunting (SERAC 2021b: 505).

Another testifier noted localized depletions of deer and increased competition in the Lisianski Inlet area at a recent Southeast Council meeting (SERAC 2021b: 513):

I came up to Alaska in 2015 to begin commercial fishing and the next year was the first time I got to go out hunting, not just in Alaska, but period. But, even just in 2016, there were noticeably more deer for a completely inexperienced novice hunter. Just seeing the animals running around compared to the limited amount that you're seeing now and how much further you have to hike for them. And, whether or not the [quantitative] data shows that there's this abundance in Unit 4, well, in the sub-area of the [Lisianski] Inlet, we are just not seeing what you are suggesting is there. There's a lot more boat traffic. There's a lot more people from other communities who are running up and down the beaches for a clear place to hike up.

Similarly, another Pelican resident explained (SERAC 2021b: 514):

I've lived here [in Pelican] for sixty-five years and I've hunted since I was twelve years old. And, you know, I've seen the deer population decline in here. And I think everybody's right on saying that. I don't know, Fish and Game, they seem to think that everything's good, but I don't think that is true. I mean I've been out hunting there last year, and I never even got a deer, thank goodness my woman did. But, yeah, I don't know, just I haven't seen anything here this year. I'm still hoping to get something. Yeah, there seems to be a lot more [boat] traffic running around here and fewer deer.

Likewise, another resident noted, "This is a low-income community. Subsistence hunting and fishing is really not optional for many folks here. Recent food scarcity has been exacerbated by the fact that our ferry service has been intermittent, and our food supply has not been dependable because of that" (SERAC 2021a: 189–190). The Alaska State Ferry is scheduled to visit Pelican once a month from October through December, and March through April (Juneau Empire 2022; FSB 2023). However, Pelican residents described the Alaska State ferry as unreliable and the stop at Pelican has been cancelled



many times because of issues like ferry worker strikes, the pandemic, and mechanical problems (SERAC 2021a). The Ferry is also not scheduled to visit Pelican in January or February (Juneau Empire 2022). This has caused increasing concern about getting food in the community. It is also common for planes to Pelican to be cancelled because of bad weather. One Pelican resident explained, “You have to put up lots of food to sustain yourself” (SERAC 2021b: 68–69). However, residents have noted that increased hunting pressure can easily lead to issues of crowding, safety, and reduced hunter success due to the generally steep terrain and limited drainages in and around Lisianski Inlet (SERAC 2021a, 2021b). Overall, approximately 80% of the recent annual deer harvests in Unit 4 have been made by boat-based hunters (Bethune 2022a). Regarding the deer hunting situation in and around Pelican, one long-time resident commented:

The big problem I see is the increased competition. There are more boats hunting, and more people coming in on the airlines and on the ferry and hunting locally...So, there's more competition in the [Lisianski] Inlet and more competition in the outer coastal areas. Large seine boats are coming up from Sitka, with three or four smaller boats attached and they're hunting areas that were traditionally hunted by people who had Forest Service lease cabins out in that area. So, there's more pressure all the way from Sitka to here. On the outer coast there's more space and area for deer than there is in the Inlet. The Inlet is restricted by limited drainages (SERAC 2021b: 503-504).

The resident continued, commenting on the impact of increased hunting competition and unreliable ferry service on local food security. She noted, “I'm also the Chairman of the Food Bank in Pelican, and in the last year we distributed over 2,000 pounds of food to residents of Pelican because of shortage of food...and because of the limited ferry service. So, I think it's important to know the degree which people in this area depend on wild game and fish” (SERAC 2021b: 504). Though prey switching among subsistence users has been a recorded method for coping with issues of competition and fluctuations in the availability of primary subsistence resources, a recent study among nineteen rural communities in the Yukon River drainage suggests that such strategies often do not provide substantial compensation for declining harvests of primary subsistence resources (Hansen et al. 2013). The overall utility of prey switching may be complicated by policy restrictions, the increased time and money required to harvest sufficient amounts of secondary resources, and/or simultaneous declines in secondary resources (Hansen et al. 2013). The impact of policy restrictions, declining incomes and rising gas prices, and declines in other key resources like salmon and halibut have been documented in subsistence studies of similar Unit 4 communities like Hoonah (see Ream and Sill 2017) and Angoon (see Grant and Sill 2017). These types of issues could also limit the utility of prey switching as an adaptive strategy in Pelican.

Pelican residents have noted that deer harvests tend to vary somewhat from year-to-year, based on numerous environmental factors. Sometimes, after a heavy snowfall covers available browse, deer are observed on the beaches seeking food, but return to forested areas and higher elevations after it rains to take advantage of the browse in those areas (SERAC 2021a, 2021b). Some years, such as 2006 through 2008, deep prolonged snow coverage can result in significant deer over-winter mortality (SERAC 2021a, 2021b). Bears seeking deer can also scare deer off the beaches (SERAC 2021a, 2021b). One area resident noted, “The recent winters have been less severe with less snow which can impact whether the

deer are being driven to the beach fringe or not. [Fewer deer sightings] may have been because the snow level was well above the beach fringe” (SERAC 2021b: 73). It has also been suggested that increasing amounts of boat traffic in and around the Pelican area may be scaring deer away from the beach fringe (FSB 2023: 462). A different resident explained:

I kind of live for deer and I wasn’t able to get any last year. I’m getting too old to climb up to the top of the mountain so, you know, I do rely for them to be on the beaches. Anyway, last year I wasn’t able to score any. So, I’ve been saying that the [deer] population, I don’t know, it seems to be decreasing, if you ask me, and there’s more pressure on them all the time (SERAC 2021b: 172).

However, some FQSUs and NFQUs have suggested that deer hunting issues currently being experienced by residents of places like Pelican stem from local preferences for beach hunting (SERAC 2021b). They note that the perception of localized declines in the Unit 4 deer population may be due to recent mild winters, which resulted in deer being spread-out through the forests rather than concentrated and easily observable on the beaches (SERAC 2021b). A resident of Juneau explained:

I was out there [Unit 4] for six weeks last year...and you know, it was cold. It was cold and there wasn’t much snow last year. So, if you wanted to get deer, you had to go into the woods. It’s as simple as that... So, I thought we were pretty successful... When you did get into the woods and tried to walk around up in there, you were crunching through the little bit of frozen snow that was there...but there was a lot of sign [of deer] ... Very seldom did we run the beaches. I mean that’s, to me, not really hunting, but I understand for folks who are a little older. (SERAC 2021b: 174).

As this statement by the Juneau hunter alludes, hunting for some NFQUs is not just about the efficiency with which one can harvest a deer for food; it is also about the experience and sporting nature of the hunt. Still, other Pelican residents who hunted in areas beyond the beaches also found it difficult to harvest enough deer to meet their needs in 2020 (SERAC 2021a). For example, one resident explained, “I’ve hunted off the lower part of the hills, and I haven’t had any luck this year” (SERAC 2021a: 19–20). Another resident commented, “I’ve been out in the hills hunting, and there is a definite lack of deer” (SERAC 2021b: 504).

Some Pelican residents have the resources to go out to the “outer coast” to seek deer and have been more successful, while others must stay closer to Pelican because they lack the appropriate boats and/or money for fuel required to travel further away (SERAC 2021a, 2021b). As one Pelican resident explained, “I’m a ‘have,’ I have a big boat. I’m able to travel out and go to the outer coast and go down to where we grew up always hunting, because my family, we rarely hunted in the inlet. We left that for ‘the have nots,’ the people with just a skiff, you know” (SERAC 2021b: 84). As researchers and residents have noted, most rural Alaskans now rely upon gasoline and motorized transportation to hunt, fish, and gather subsistence resources (Brinkman et al. 2014). A recent study of eight rural Alaskan communities in the Yukon Flats region quantified the significant impacts of rising fuel costs and depressed local economies among subsistence harvesters (Brinkman et al. 2014). Overall, 81% of the

subsistence harvesters participating in the study noted that they had reduced the distance they traveled to conduct subsistence activities over the past ten years because of gasoline costs (Brinkman et al. 2014). Similarly, 89% of the study participants noted that they had reduced the number of yearly trips they took to conduct subsistence activities for the same reason (Brinkman et al. 2014). As the researchers explained:

During the last ten years [2002 – 2012], the median distance traveled to perform subsistence decreased by 60%, and the median number of annual trips taken to perform subsistence decreased by 75%. The change in subsistence activity was similar across and within communities. Eighty-five percent of the people interviewed reported that they were making sacrifices with serious consequences, such as putting off paying monthly bills, to buy gasoline for subsistence activities. To adapt to high gasoline prices, most [study] participants said that they are using more efficient modes of transportation (69%), followed by more sharing of gasoline costs with family and friends (37%), and conducting more multipurpose subsistence trips (20%). With subsistence practices being critical to food security and cultural identity...our results suggest that unaffordable fuel has threatened social resilience [in this area] (Brinkman et al 2014: 18).

As the proponents have noted in the discussion section of this proposal, “Subsistence livelihoods require effective and efficient harvests... High fuel costs, depressed economies, small boats, and inclement weather are all impacting the ability of Pelican residents to meet their subsistence needs. Pelican residents cannot afford to have unsuccessful deer hunts, or to travel far from their community to hunt deer.” The problems associated with rising gas prices and declining economies constraining subsistence harvesting efforts and constricting the size of harvest areas have also been noted in subsistence studies of similar Unit 4 communities like Hoonah (see Ream and Sill 2017) and Angoon (see Grant and Sill 2017). Therefore, reductions in deer hunter days and harvests reported by Pelican residents during the most recent five-year reporting period could be related to the impacts of rising fuel prices in an area with declining commercial fisheries employment and income earning opportunities (see **Table 6**). These reductions in hunter effort and harvests are also related to the declining community population witnessed in this area since the 1990s (**Table 2**). Reductions in the number and distance of trips that Pelican residents can afford to take to harvest subsistence resources would almost certainly contribute to issues of user conflict and competition in the proposal area.

For some residents of Unit 4, there are also concerns that non-local hunters impact the success of local hunters in ways that go beyond competition and crowding. Some residents assert that non-local hunters, including hunters primarily seeking bear, often shoot at deer and miss, causing the deer to become more skittish and wary of all hunting presence. As one testifier explained, “You used to be able to drive up to a deer, get out of the boat within reasonable range and take the deer. Now, you have to stop 400 or 500 yards away” (SERAC 2021a: 59), and “this is something my dad taught me, his dad taught him, and my mother's father taught me. If you shoot at a deer [and miss], you're never going to see that deer again. That's the nature of deer” (SERAC 2021b: 397).

## Harvest History

Hunter harvest and effort reporting is another one of the suite of methods that managers use in combination to monitor deer population trends in Unit 4. As Bethune (2020: 15) notes, hunter harvest trends, particularly those observed at larger scales, typically reflect current deer population levels. However, hunter self-reported harvest and effort data should be analyzed cautiously, as reporting rates can be less than ideal (Bethune 2020). This is particularly the case in smaller rural communities where reporting rates are often much lower than elsewhere, sometimes less than 30% (Bethune 2020). Management staff typically call hunters to ask about their hunting efforts and harvests to try to achieve a 60% reporting rate when response rates are low. However, to account for hunters who do not report, data are proportionally expanded by community size (Bethune 2020). Therefore, “in small communities with low reporting rates, expanded data may be based on the reports of only a handful of hunters, resulting in a good deal of uncertainty about the [accuracy of] expanded data” (Bethune 2020: 16).

Additionally, there are several other reasons why harvest estimates often do not accurately represent the hunting efforts and success rates of residents in small, rural communities. First, residents of rural communities often under-report their harvests because of differences in their interpretations of survey questions. This is a common phenomenon with survey questions, in which the particular lived experiences of respondents lead them to interpret questions differently than intended. For example, residents have noted that the State harvest reporting system used to measure hunting effort and success may be misleading because subsistence users often only document their successful hunts (SERAC 2021b). As one Unit 4 resident explained, “I question this [harvest success] information. When I complete a deer hunter survey, I only list actual deer harvested, and it is always a one-day hunt. I never list the number of times I hunt without success, and it may be three, four, or five times before I shoot a deer” (SERAC 2021b: 73).

Available harvest and effort data also does not specifically account for the impact of declining, ageing populations in communities like Pelican (SERAC 2021b). It would be reasonable to expect that a community’s harvests, total number of hunters, and total days hunted would decrease as their population decreases (SERAC 2021b). An ageing population of hunters might also be more reliant upon beach and low elevation hunts in an otherwise steep and rugged landscape. Declining community populations, however, do not explain local perceptions of increased hunting pressure. Though harvest reports and comprehensive subsistence survey data are often the only sources of quantitative information available on the harvest and use of wild resources by residents of small rural communities in Alaska, it is important to consider this type of quantitative information holistically, in combination with qualitative testimony of local users’ observations and traditional ecological knowledge (SERAC 2021b).

ADF&G harvest data from 2000 through 2021 (ADF&G 2022c, ADF&G 2021) were used to try to gain some understanding of the deer hunter effort and harvest trends of FQSUs and NFQUs hunting in the vicinity of the proposed closure area. Hunter effort and harvest measurements were grouped by Wildlife Analysis Area (WAA), which roughly correspond to major watersheds or other distinct geographic areas (see **Figure 2**). These are the smallest units of analysis available in the harvest reporting framework. It should be noted, however, that the proposed closure area does not directly coincide with WAA

boundaries (see **Figure 2**). This issue complicates the analysis. Since effort was calculated by WAA, individual hunters using multiple WAAs in a single regulatory year may also have been counted multiple times and over-represented in these calculations. Likewise, hunter effort, measured as a function of the overall number of hunters and hunter-days, does not specifically account for potential confounding factors such as community population decline, weather, the price of gas, or hunter competition.

According to the available data, from 2000 to 2021, approximately 71% of Pelican residents' reported deer harvests, and 66% of their reported hunting days took place within the WAAs encompassed by the proposal area (see **Table 6**). The Yakobi Island (3418) and Upper Lisianski Inlet/Lisianski River (3419) WAAs accounted for roughly half of these harvests and hunting days, while a smaller percentage of Pelican hunting days and deer harvests took place within the West Coast Chichagof (3417) and Port Althorp/Lower Lisianski (3421) WAAs (**Table 6**). Pelican residents reported relatively minimal hunting occurring in WAAs located outside the proposal area (**Table 6**). However, the location of about 25% of the total reported harvest and 32% of the hunting days reported by Pelican residents during this time could not be determined from the information returned and is unknown. It is possible that some of this unknown harvest and harvest effort may have also taken place within the WAAs encompassed by the proposal area. Based on the distribution of reported deer harvest and hunting days by Pelican residents, proximity to Pelican appears to be a primary factor in selecting hunting locations (OSM 2022d).

Based on the reported data, an average of approximately 147 users hunted for 535 days, harvesting a total of 248 deer within the WAAs encompassed by the proposal area each year from 2000 to 2021 (see **Table 7**). However, the total number of hunters, hunter days, and deer harvested in this area by both FQSUs and NFQUs were variable between years (see **Table 7**). In most years, FQSUs harvested more deer from the WAAs encompassed by the proposal area due to the larger number of hunters present in this group. On average, roughly 57% of all hunters utilizing the WAAs encompassed by the proposal area each year were FQSUs (**Table 7**). However, over half of the FQSUs that reported hunting in these WAAs each year came from outside of Pelican (**Table 7**). The data also shows a decreasing proportion of FQSUs in these WAAs over time, coupled with an increasing proportion of NFQUs (**Table 7**). This change corresponds with the declining population witnessed in Pelican and other nearby rural communities during this period. The largest proportion of NFQUs hunting in the WAAs encompassed by proposal area each year came from Juneau (35% on average). Other NFQUs typically composed about 8% of all hunters each year (ADF&G 2021).

The estimated yearly data on harvests within the WAAs encompassed by the proposal area shows similar trends between 2000 and 2021 (**Table 7**). On average, Pelican residents were responsible for about 18% of the harvests taking place within in these WAAs each year, while other FQSUs were generally responsible for about 41% of the harvests (**Table 7**). NFQUs were also responsible for approximately 41% of harvests in these WAAs each year (**Table 7**). The reported harvest by non-residents within these WAAs each year was quite small (ADF&G 2021). However, the location of about 24% of the harvests by non-residents in Unit 4 could not be determined from the information returned and is unknown for this period.

**Table 6.** Distribution of Unit 4 Deer Hunting Effort and Harvest by Pelican Residents by Wildlife Analysis Area (WAA), 2000-2021 (ADF&G 2021, 2022c).

<b>WAAs Within Proposal Area</b>	<b>Total Harvest</b>	<b>Days Hunted</b>	<b>Percent Harvest</b>	<b>Percent Days Hunted</b>
3417 WEST COAST CHICHAGOF	164	284	12%	13%
3418 YAKOBI IS.	388	440	28%	20%
3419 UPPER LISIANSKI INLET, LISIANSKI RIVER	371	660	27%	30%
3421 PORT ALTHORP, LOWER LISIANSKI, INIAN IS.	60	77	4%	3%
<b>Total within Proposal Area</b>	<b>982</b>	<b>1461</b>	<b>71%</b>	<b>66%</b>
<b>WAAs Outside Proposal Area</b>	<b>Total Harvest</b>	<b>Days Hunted</b>	<b>Percent Harvest</b>	<b>Percent Days Hunted</b>
3002 SITKA ROAD SYSTEM	2	2	<1%	<1%
3003 SILVER BAY, DEEP INLET	5	5	<1%	<1%
3312 DUFFIELD PENIN., BEAR BAY	4	2	<1%	<1%
3314 FISH BAY DRAINAGES	3	2	<1%	<1%
3416 KHAZ PENIN., SLOCUM ARM	7	5	<1%	<1%
3526 NORTH SHORE TENAKEE INLET	2	2	<1%	<1%
3629 SOUTHERN SHORE TENAKEE INLET	5	8	<1%	<1%
3731 KELP BAY-TAKATZ BAY	2	2	<1%	<1%
3733 WHALE BAY DRAINAGES, WILDERNESS COAST	10	0	<1%	0%
3835 NORTHERN MANSFIELD PENIN.	3	3	<1%	<1%
4041 WHITEWATER BAY, WILSON COVE	2	2	<1%	<1%
4252 HUMPBACK, GALLAGHER CREEKS	6	6	<1%	<1%
<b>WAAs</b>	<b>Total Harvest</b>	<b>Days Hunted</b>	<b>Percent Harvest</b>	<b>Percent Days Hunted</b>
<b>Total Outside Proposal Area</b>	<b>49</b>	<b>36</b>	<b>4%</b>	<b>2%</b>
<b>Total (Known Harvest Area)</b>	<b>1031</b>	<b>1496</b>	<b>75%</b>	<b>68%</b>
<b>Unknown Harvest Area</b>	<b>356</b>	<b>733</b>	<b>25%</b>	<b>32%</b>

The estimated data on hunter days spent in the WAAs encompassed by the proposal area each year between 2000 and 2021 exhibits a somewhat different trend (**Table 7**). NFQUs spent more days hunting in these WAAs during fifteen of the twenty-two years in this period (**Table 7**). However, the overall average yearly difference in hunting days between FQSUs and NFQUs is relatively small (**Table 7**). On average, NFQUs were responsible for about 51% of hunter days spent in the WAAs encompassed by the proposal area each year (**Table 7**). Pelican residents were responsible for about 12% of hunter days spent in these WAAs each year, while other FQSUs were responsible for 36% of hunter days in these WAAs (**Table 7**). The generally higher number of hunting days spent in these WAAs by NFQUs could be an indication that FQSUs are more efficient harvesters in this area or do not report all their hunting effort. This difference could also be an indication that NFQUs are engaging in other activities while hunting or

engaging different hunting methods. This difference in reported hunter days could also be related to declining human populations in rural communities like Pelican, or issues like rising gasoline prices restricting local hunting efforts.

Overall, Pelican residents and other FQSUs reported declines in average yearly hunters, hunter days, and harvests in the WAAs encompassed by the proposal area between the 2001-2005 reporting period and the 2016-2020 reporting period (see **Table 7**). Among these two user groups, Pelican hunters reported the greatest declines in average yearly hunters (-55% or -22 hunters), hunter days (-64% or -70 hunter days), and harvests (-54% or -38 deer) between these two reporting periods (**Table 7**). These declines in reported deer hunting effort and harvests by Pelican residents are likely explained by the declining human population of Pelican witnessed between these two reporting periods (**Table 2**), coupled with the impacts of rising fuel prices and depressed local economies (**Table 7**). Though the number of NFQU hunters, hunter days, and harvests in the WAAs encompassed by the proposal area have not increased over the course of the twenty-two years of quantitative data analyzed for this proposal, they have also not decreased (**Table 7**). NFQU hunter effort and harvest has generally remained more stable over time than the other two user groups (**Table 7**).

Though NFQUs composed a significant proportion of the hunters utilizing the WAAs encompassed by the proposal area each year between 2000 and 2021, the proposal area accounted for a relatively small amount of NFQUs' overall hunting efforts and harvests within Unit 4 as a whole (ADF&G 2021, 2022c). Approximately 4% (1,387 users) of all NFQUs' reported hunting in the WAAs encompassed by the proposal area between 2000 and 2021. NFQUs reported spending about 5% (6,005 days) of all their hunting days in Unit 4 within these WAAs during this time (ADF&G 2021, 2022c). Likewise, roughly 6% (2,220 deer) of all deer reported harvested by NFQUs in Unit 4 from 2000-2021 were taken from these WAAs (ADF&G 2021, 2022c). WAA 3417 (West Coast Chichagof) was the portion of the proposal area most heavily utilized by NFQUs during this time, accounting for roughly half of all their hunting efforts and harvests in the WAAs encompassed by the proposal area (ADF&G 2021, 2022c). Only a small portion of WAA 3417 would be closed under the current proposal.



**Table 7.** Estimated hunting effort and harvest by user group within the Wildlife Analysis Areas encompassed by the proposal area during recent five-year reporting periods (ADF&G 2021).

Year	Pelican Hunters	Pelican Hunter Days	Pelican Harvests	Other FQSU Hunters	Other FQSU Hunter Days	Other FQSU Harvests	NFQU Hunters	NFQU Hunter Days	NFQU Harvests	Total Hunters	Total Hunter Days	Total Harvests
2000	52	99	52	96	211	92	88	534	97	236	844	241
2001	62	142	108	63	307	118	54	272	102	179	721	327
2002	37	123	71	65	144	91	61	281	82	163	548	244
2003	44	83	64	94	285	163	66	204	132	204	573	359
2004	38	144	77	59	148	113	79	349	150	177	640	340
2005	19	53	34	74	215	150	60	311	144	153	579	328
<b>5 Year Average</b>	<b>40</b>	<b>109</b>	<b>70</b>	<b>71</b>	<b>220</b>	<b>127</b>	<b>64</b>	<b>283</b>	<b>122</b>	<b>175</b>	<b>612</b>	<b>319</b>
2006	15	44	34	59	137	110	76	400	138	149	580	282
2007	20	23	11	35	98	45	39	179	29	94	300	86
2008	24	38	55	54	113	19	43	152	81	121	303	155
2009	30	70	43	40	127	52	48	173	62	117	370	157
2010	18	35	27	84	410	169	68	218	94	170	663	290
<b>5 Year Average</b>	<b>21</b>	<b>42</b>	<b>34</b>	<b>54</b>	<b>177</b>	<b>79</b>	<b>55</b>	<b>224</b>	<b>81</b>	<b>130</b>	<b>443</b>	<b>194</b>
2011	26	193	61	80	346	155	77	287	140	183	826	356
2012	19	57	31	50	140	103	45	161	72	114	358	206
2013	16	35	30	48	236	134	66	316	110	130	587	274
2014	17	59	34	60	163	89	64	261	89	141	483	212
2015	15	34	35	29	149	76	85	348	160	129	531	271
<b>5 Year Average</b>	<b>19</b>	<b>76</b>	<b>38</b>	<b>53</b>	<b>207</b>	<b>111</b>	<b>67</b>	<b>275</b>	<b>114</b>	<b>139</b>	<b>557</b>	<b>264</b>
2016	19	42	46	47	173	125	69	288	125	135	503	296
2017	19	41	37	43	116	89	50	225	79	112	382	205
2018	17	35	29	48	154	72	63	281	93	128	470	194
2019	11	31	21	59	188	114	54	185	67	124	404	202
2020	22	45	29	43	239	90	72	287	91	137	571	210
<b>5 Year Average</b>	<b>18</b>	<b>39</b>	<b>32</b>	<b>48</b>	<b>174</b>	<b>98</b>	<b>62</b>	<b>253</b>	<b>91</b>	<b>127</b>	<b>466</b>	<b>221</b>
2021	24	36	55	41	158	80	64	298	83	129	492	218
<b>Overall Average</b>	<b>26</b>	<b>66</b>	<b>45</b>	<b>58</b>	<b>194</b>	<b>102</b>	<b>63</b>	<b>273</b>	<b>101</b>	<b>147</b>	<b>535</b>	<b>248</b>

## Other Alternatives Considered

Harvest limit reduction: The current proposal (WP24-06) responds to critiques of an earlier, similar proposal (WP22-10) where the proposed harvest limit reduction to four deer for NFQUs was not considered likely to provide for a meaningful conservation benefit or to substantially improve the success rates of FQSUs (SERAC 2021b). Recently reported data shows that relatively few NFQUs take their full harvest limit in this area (OSM 2022d). A harvest limit reduction that allows for the taking of more than one deer by NFQUs would probably not reduce issues of competition and crowding in and around the proposal area during the proposed closure period.

Reduce extent of closure area and/or period of closure: The current proposal represents the outcome of significant consideration of this option. The proponents note that they intend to limit the proposed closure area to the location most utilized by Pelican residents (**Table 5**). The proposal also limits the length of the closure to a relatively short period of time considered most important to Pelican residents. At its fall 2023 meeting, The Southeast Council voted to further reduce the proposed closure period from November 1-15 to November 1-10 (SERAC 2023). These reductions could help minimize competition and conflicts between user groups in Pelican's most heavily utilized deer hunting areas, while displacing fewer NFQUs. However, there are portions of the proposed closure area that may not be as essential to local subsistence deer hunting efforts. It may be worth considering reducing the size of the proposed closure area, particularly in light of another current proposal (WP24-05) seeking to close a portion of northeast Chichagof Island to NFQUs during the same time period.

Working Group: One alternative considered during previous deliberations on similar proposals, WP22-07, -08, -09/10, was to establish a Unit 4 deer working group. This suggestion was mentioned by some Southeast Council members and public testifiers during the fall 2021 Southeast meeting (OSM 2022a). Developing a "Unit 4 deer management strategy," which was also suggested multiple times during the fall 2021 Southeast Council meeting (OSM 2022a). It was suggested that this alternative would allow consideration of deer harvest and hunter competition issues in Unit 4 on a more holistic and longer timescale. It would also enable all alternatives to be considered and could help bring user groups together for discussion and compromise.

Since this time, a "North Unit 4 Deer Working Group" has been established under the guidance of the Hoonah Indian Association Environmental Programs (HIA Environmental 2023a). The first meeting of this group was held on March 15, 2023. The stated goals for the group are to:

Complete annual community surveys on deer harvest and use by training people in the communities to do the work; (2) Understand if/how competition is impacting subsistence use of deer on north Chichagof; (3) Collect deer data through camera traps in overwintering areas to begin to get trend data for deer numbers; (4) Host meetings where managers, community members, and non-community members can discuss their deer harvest needs; and (5) Increase community understanding of how harvest reporting is used in management with the goal of increasing community reporting (HIA Environmental 2023a).

Preliminary information from HIA subsistence surveys and the deer working group has been integrated into this analysis.

### **Effects of the Proposal**

The proponents have asserted that the continuation of subsistence and meaningful rural preference is under threat from increasing competition from NFQUs in and around Pelican. If the Board adopts this proposal, it will restrict NFQUs from hunting deer in the proposal area from November 1-15. This could potentially provide FQSUs in the area with an enhanced subsistence harvest opportunity, by reducing user competition and conflict during a period of peak hunter effort and harvest that is particularly important for a community that has recently faced winter food security issues. The proponents have noted that competition can significantly restrict access to favored deer hunting sites located in narrow embayments. November is the month when the greatest amount of federally qualified and non-federally qualified hunter effort and harvest has taken place in Unit 4 in recent years. Weather conditions are typically favorable for hunting and meat processing, deer provide the highest quality and amount of meat, and deer are generally more susceptible to harvest during this time.

Adopting the proposed closure could lead to increased harvest effort by NFQUs before and after the closure period. The proposed closure may also have the unintended consequence of promoting increased hunting of the beaches below the mean high tide line by NFQUs, as the area of the beach located below the mean high tide mark is state-managed land and would remain open during the proposed closure period. The proponents, however, note that beach hunting generally takes place after the proposed closure period and above the high tide line in this area. Adopting the proposal would also prevent NFQUs with local ties to the area from directly participating in deer hunting during the period of closure, but they would still be able to help in other ways such as with meat processing. Some people from Pelican move to Juneau for employment but often return to home to participate in subsistence harvesting with family and friends.

While deliberating similar proposals (WP22-07, -08, -09/10) during the previous wildlife cycle, some Southeast Council members expressed concern over the potential displacement of NFQUs to other areas of Unit 4 if these proposals were to be adopted. These Council members were particularly concerned about potential displacement creating similar problems elsewhere if all three deer proposals under consideration at the time were to be adopted (SERAC 2021b). This issue remains a concern with the current proposal (WP24-06) and a similar proposal (WP24-05) to close an area of northeast Chichagof Island to NFQUs during the same time-period.

### **OSM PRELIMINARY CONCLUSION**

**Oppose WP24-06.**

#### **Justification**

Deer have been and continue to be very important to local subsistence livelihoods and ways of life for FQSUs living in the Pelican area. Many area residents have noted that they have had to change their deer

hunting methods to focus their efforts much closer to home, as it has become too expensive and dangerous to travel further without appropriate boats and fuel. Local knowledge attests to the fact that only a limited number of boats and users can hunt in narrow bays and other preferred locations due to issues of access and resource competition in these areas. Residents of Pelican and similar communities have also noted that deer populations within Unit 4 may not be tracked at a fine enough scale to consistently capture localized depletions that exacerbate issues of competition and user conflict. Residents have also explained that hunter effort and harvest reporting tend to underestimate the amount of hunting effort taking place, and overestimate hunting success rates. There is data presented in this analysis that supports these arguments, suggesting that rates of competition for deer in the proposal area in recent years may be impacting the success and efficiency of Pelican residents who have had to focus their deer hunting efforts closer to home.

However, it is still not clear that the current levels of competition created by NFQUs in the proposal area pose the type of threat to the continuation of subsistence that would justify a closure to non-federally qualified users. There may be a better compromise available to address the proponents' concerns without enacting a closure to non-federally qualified users. NFQUs compose a large proportion the hunters utilizing the proposal area each year. However, based on reported data, WAA 3417 (West Coast Chichagof) appears to be the portion of the proposal area most heavily utilized by NFQUs, accounting for roughly half of all their reported hunting efforts and harvests in the proposal area between 2000 and 2021. Only a small portion of WAA 3417 would be closed under the current proposal, and it is not clear whether this portion of WAA 3417 is a significant hunting location for NFQUs.

A closure in the proposal area may also have the unintended consequence of promoting increased hunting of the beaches below the mean high tide line by NFQUs. There may be more effective avenues to address this issue. It is also not clear to what extent NFQUs engage in other hunting methods such as muskeg/forest and alpine hunts, and whether these hunting efforts also represent a substantial source of competition for FQSUs in the proposal area. Adopting this proposal would also prevent NFQUs with local ties to the area from directly participating in deer hunting with local family and friends during the period of closure. However, these users would be able to participate in other ways, such as assisting with meat processing.

Interpretations of the information presented in this analysis are also complicated by a number of interrelated issues. Recent mild winters in the area may have resulted in fewer deer being easily visible on beaches, giving the appearance of localized declines in the deer population and/or increased competition for deer. There are limitations in the hunter harvest and effort reporting framework, as well as the regularity and reliability of reported data. Recent human population declines in communities like Pelican exacerbate issues with harvest and effort analyses, as population declines may be misinterpreted as a lack of hunting effort when compared to the harvest and effort data compiled for previous years. Overall, the Office of Subsistence Management feels that more information is still needed from a greater sample of the local population to determine whether a closure to NFQUs is necessary, and exactly where that closure should be located. OSM hopes to receive this type of information through additional meetings of the Southeast Council and the North Unit 4 Deer Working Group.

## ANALYSIS ADDENDUM

### OSM CONCLUSION

**Support WP24-06 with modification** to reduce the proposed closure period from November 1-15 to November 1-10.

The modified regulation should read:

#### Unit 4 - Deer

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

*Aug. 1 – Jan. 31*

***Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.***

### Justification

Deer have been and continue to be very important to local subsistence livelihoods and ways of life for FQSUs living in the Pelican area. Data supports residents' claim that competition with non-locals has been threatening the continuation of subsistence uses of deer, and that closure to non-federally qualified users is necessary to continue these uses per §815(3) of ANILCA. First, residents of Pelican have noted that they have had to change their deer hunting methods to focus their hunting efforts in areas closer to home, as it has become too expensive and dangerous to travel further without appropriate boats and fuel. Local knowledge attests to the fact that only a limited number of boats and users can hunt in narrow bays and other preferred locations due to issues of access and resource competition in these areas. Testimonies suggest that non-locals, who often travel from greater distances with better boats and equipment than those in Pelican, will fill these local bays, preventing locals from accessing them.

Second, residents of Pelican have also noted localized depletions of deer in key hunting areas closer to home, which exacerbate issues of user competition and conflict. The deer populations within Unit 4 may not be tracked at a fine enough scale to consistently capture these issues. Third, residents have also explained that their difficulties in harvesting deer are not well represented in the quantitative data collected on deer harvests and hunter effort. Residents have noted that hunter effort and harvest reporting tend to underestimate the amount of hunting effort taking place, and overestimate hunting success rates. Fourth, NFQUs have accounted for the majority of hunter days and a substantial percentage of the deer harvested from the WAAs encompassed by the proposal area, which may be impacting the success and efficiency of Pelican residents who have had to focus their deer hunting efforts closer to home.

The OSM modification would increase subsistence harvest opportunity for FQSUs in the Pelican area by allowing for a ten-day period where residents could hunt in their most heavily utilized areas closest to

home, during a very important time in the local deer harvest season, without potential competition from NFQUs. During the proposed ten-day closure, NFQUs would maintain the ability to hunt the majority of the west coast Chichagof area (WAA 3417), which appears to be a key location for NFQU hunter activity on Chichagof Island.

This modification is expected to minimally impact NFQUs due to its short duration and because less than 4% of all NFQUs in Unit 4 hunt deer within the WAAs included in the proposal area. Additionally, only a small portion of WAA 3417 (see **Figure 2**), which has the highest usage rate by NFQU, is included in the proposed closure area. However, it will have disproportionate benefits for Pelican residents who, as previously stated, are experiencing high rates of food insecurity as well as competition from NFQUs in preferred deer hunting locations and cannot afford to travel far from home or spend long periods of time deer hunting.

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## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

### Southeast Alaska Subsistence Regional Advisory Council Recommendation

**Support** WP24-06 **with modification** to reduce the proposed closure period from November 1-15 to November 1-10. The Council felt this action was necessary to support the continuation of subsistence uses in this area, while also causing the least possible impact to non-federally qualified users. The Council felt that supporting the proposal with modification would provide a more meaningful subsistence preference by reducing competition during a key time for subsistence deer hunting, and thereby improve Pelican residents' ability to access deer and meet their subsistence needs efficiently and economically in a context where economic declines have forced residents to focus their hunting strategies much closer to home.

OSM's interpretation of the Council's intent is:

#### Unit 4 - Deer

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

*Aug. 1 – Jan. 31*

***Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.***

## INTERAGENCY STAFF COMMITTEE COMMENTS

The ISC acknowledges the extensive effort made by the Southeast Alaska Subsistence Regional Advisory Council (Council) during both the 2022-2024 and the 2024-2026 Wildlife Regulatory Cycles to help federally qualified subsistence users meet their subsistence needs for deer in the Pelican area.

Deer populations in Unit 4 are the highest in the state and closures are not needed for conservation reasons. The Council's justification for submitting WP24-06 focuses on the closure being necessary to continue subsistence uses due to competition and user conflict in the areas closer to Pelican. While reported harvest success by federally qualified subsistence users appears stable over the last decade based on quantitative harvest data, federally qualified subsistence users in the area report these data underestimate hunter effort and do not capture competition that affects their ability to harvest enough deer to meet their subsistence needs.

The ISC recognizes the effort that the Council has put into providing a meaningful subsistence priority, while trying to reduce restrictions on non-federally qualified users as much as possible. Since submission of their first proposal for the 2022 regulatory cycle, the Council reduced the duration of their requested closure from 2.5 months to 15 days to the current Council recommendation of 10 days at the beginning of November and reduced the requested closure area to those areas closest to home and most utilized by Pelican residents.

## ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

### Alaska Department of Fish and Game Comments

#### **Wildlife Proposal WP24-06**

This proposal would close federal public land on Chichagof and Yakobi islands near Pelican that drain into Lisianski Inlet, Lisianski Strait and Stag Bay south of a line connecting Soapstone and Column Points and north of a line connecting Point Theodore and Point Uray to deer hunting by non-federally qualified users (NFQU) from November 1–November 15 (Figure 1).

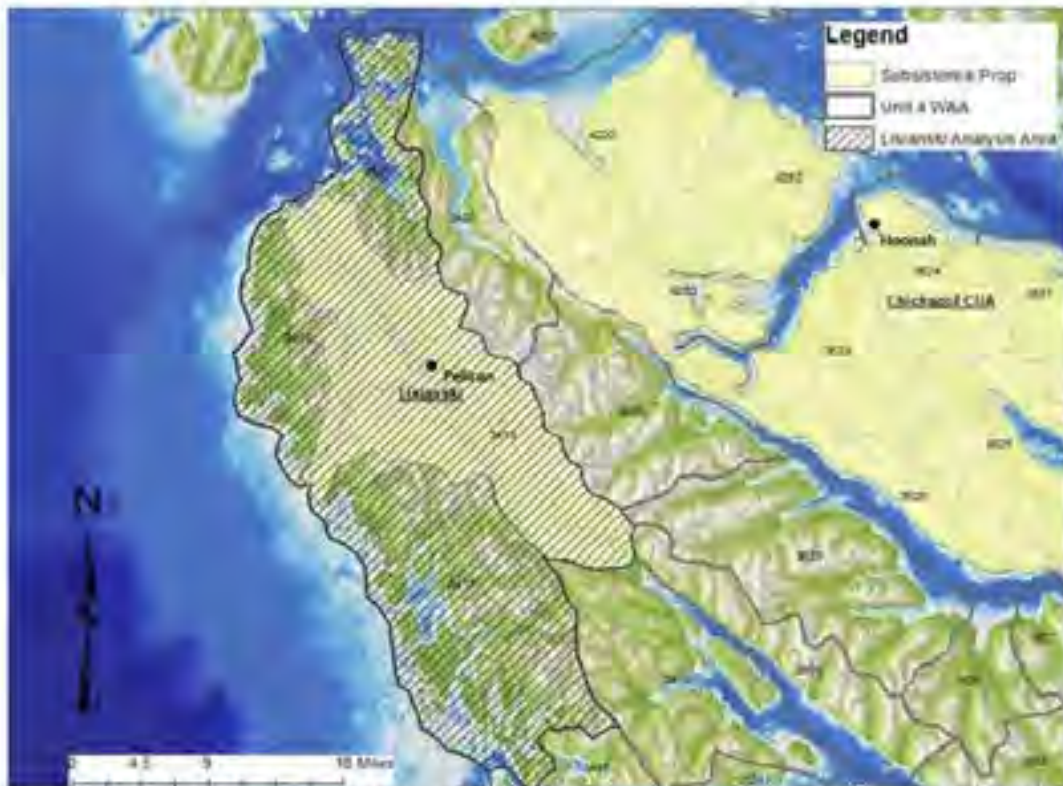


Figure 1. Map of the Lisianski proposal area and boundaries of the ADF&G Wildlife Analysis Areas for deer hunter data used to analyze effects of the proposal

#### **Position**

The Alaska Department of Fish and Game (ADF&G) **OPPOSES** this proposal because there are no justifications under the Alaska National Interest Lands Conservation Act (ANILCA) for the Federal Subsistence Board (FSB) to approve this closure. If enacted, it would unnecessarily deprive NFQUs of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA. In *Alaska v. Federal Subsistence Bd.*, 544 F.3d 1089, 1100 (9<sup>th</sup> Cir. 2008), the Ninth Circuit ruled that, under ANILCA, the Federal Subsistence Board (FSB) may regulate subsistence use but is prohibited from limiting nonsubsistence use. A reduction in NFQU opportunity for hunting deer in GMU 4 is inconsistent with ANILCA under applicable case law on federal preemption.” Section 815 of ANILCA authorizes federal restrictions on

nonsubsistence uses on the public land only if “necessary for the conservation of healthy populations of fish and wildlife” or if necessary to “continue subsistence uses.” Based on the following analysis of the only annually collected, objective, and quantifiable data available, none of those reasons apply. There is no conservation concern for the Chichagof/Yakobi Island deer population, and none of the harvest data collected remotely suggests FQUs are having any issues harvesting deer. In fact, several indices indicate deer remain abundant in the area affected by the proposal and local hunters are highly efficient at harvesting deer. Given this evidence there is no need to restrict harvest to conserve the population.

The stated purpose of the proposal is to “establish a meaningful preference for the continuation of subsistence use of deer”, however, the proponents provide no “substantial evidence”, as required by Section 805(c)(1) of ANILCA, in support of claims that the few NFQUs hunting in this area inhibit harvest by federally qualified users (FQU), and data provided by FQUs residing in Pelican clearly indicate that the decline in harvest by that community results from declining participation and effort by Pelican hunters. We note that FQUs in Pelican already enjoy several meaningful preferences including an extra month of hunting opportunity in January, a liberal designated hunter program where any FQU can hunt on behalf of another FQU, and living close to the resource, which allows FQUs to hunt whenever conditions are favorable. In contrast, to reach Pelican, NFQU hunters from Juneau need to plan days or weeks ahead and travel over 100 miles by personal boat or aircraft at a time of year when days are short and inclement weather is common. The very few non-resident hunters (non-Alaskan residents) in this area are limited by a more restrictive bag limit of two bucks. Further, we could find no reference in Title VIII of ANILCA to the term “meaningful preference.” Nor could we find justification for limiting NFQU hunting based on safety concerns, economics of FQUs, or the potential of altering deer behavior due to poor NFQU marksmanship. We conclude there is no lawful justification for adopting this proposal and it should be rejected under Section 805(c)(1).

Other reasons listed in support of the proposal were high fuel costs, depressed economies, small boats, and inclement weather. These were combined as “safety and economic concerns.” Public safety is addressed in §816 (b), but only in that it refers to the temporary closure of public land to *subsistence uses* for reasons of public safety. We believe closing public land to NFQUs while leaving them open for FQUs for safety purposes related to normal seasonal changes in weather and daylight would be a misuse of §816 (b).

ADF&G notes this proposal is almost identical to the one (WP22-09) that was considered by the Federal Subsistence Board at their meeting Jan. 31-Feb. 3, 2023, where they voted 7-1 to oppose adopting these restrictions to NFQUs. The justification given for voting this restriction down was:

*“...As the Staff analysts also has pointed out, Section 815(3) of ANILCA states that the Board may only restrict non-subsistence uses on Federal public lands if it's necessary for the conservation of healthy populations of fish and wildlife, to continue subsistence uses of such populations or for health and human safety reasons. The existing deer population and harvest survey data clearly shows the deer population in Unit 4 has remained stable, it's considered the highest in the state and currently there are no conservation concerns. Subsistence users have been able to continue to harvest.*



*deer at approximately the same level for the past 10 or 20 years and the amount of time it takes for a Federally-qualified users to harvest deer has not changed. In summary, the proposed regulation change does not meet the criteria for a closure or restriction to non-subsistence use."*

To date, neither the population nor harvest levels have diminished from when the FSB took this up at the beginning of 2023. The rationale still applies and none of the requirements laid out in ANILCA have been met for this restriction to be put in place. The proponents would have you believe that is not the case and that "competition" is impeding FQU harvest success. However, we know from public testimony that this means that the very presence of NFQUs is an unacceptable level of competition. During public meetings statements were made by proponents that, "I'll call it competition, or just the presence from other hunters" and "going to a favorite spot and, you know, seeing another boat there. It doesn't matter whether they're successful hunters or not, it's just the fact that they're there." Nowhere in ANILCA does it empower the FSB to enact restrictions on NFQUs based solely on their mere presence in an area.

There has been a clear lack of support for this proposal from the community of Pelican. Forty-six comments were received by OSM regarding this proposal, all in opposition. This mirrors the opposition received for WP22-09 which after an extended public process was rejected by the FSB just one year ago. We must infer that in general, this is not an important issue to the community of Pelican.

### **Background**

This proposal has the same general goal and justification as WP22-10, which the Federal Subsistence Board overwhelmingly rejected at their January 2023 meeting. The current proposal states that FQUs from Pelican are having trouble meeting their subsistence needs for deer because of competition and user conflicts with NFQUs. The proposal asserts that high fuel costs, depressed economies, small boats, and inclement weather also limit the ability of Pelican residents to meet their subsistence needs and that NFQUs exacerbate those challenges by obstructing access, competing for deer, and potentially altering deer behavior with poor marksmanship. The proposal states that for these reasons FQU hunting success is reduced, and the continuation of subsistence use of deer is hindered. To mitigate these concerns and establish a "meaningful preference" for the continuation of subsistence uses of deer, the proposal asks the Federal Subsistence Board (FSB) to close federal public land on Chichagof and Yakobi islands that drain into Lisianski Strait and Inlet and Stag Bay near Pelican (Figure 1) to NFQU deer hunters from November 1 – November 15.

Game Management Unit (GMU) 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago, and over 90% of land in GMU 4 is federally managed. All residents of Southeast Alaska (GMUs 1-5) excluding residents of Juneau and Ketchikan are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 – January 31 with a bag limit of six deer (bucks only August 1 – September 14). The current state season is August 1 to December 31 with a bag limit of six deer for Alaska residents (bucks only August 1 – September 14) and two bucks for non-residents. In 2019, the Alaska Board of Game (BOG) increased the state deer bag limit in GMU 4 from four to six deer because there is such an abundant population of deer within



this GMU. In 2023, the BOG decreased the bag limit for non-resident deer hunters in GMU 4 from six deer to two bucks. This was done not because of conservation concerns, but to reflect actual use patterns of non-resident hunters more accurately, and to mitigate perceived competition between non-resident and resident hunters.

These comments analyze indices of deer abundance, deer hunter participation and effort, and deer harvest in GMU 4. Deer abundance trends are derived from annual deer pellet group transects, aerial alpine surveys, and spring mortality surveys. Hunter effort and harvest data are derived from the annual deer hunter survey (1997 – 2010), and mandatory deer harvest ticket reports (2011 – present). Collectively, these data gathered by ADF&G are the only annually collected, objective, and quantitative information on deer abundance, hunter participation and effort, and harvest available for Southeast Alaska.

### **Analysis**

#### **GMU 4-Wide Deer Population Status**

Because monitoring deer abundance in forested habitat is challenging, deer cannot be directly counted like species in more open habitat. ADF&G uses several types of survey data to monitor trends in the population. Since the 1980's ADF&G has used spring pellet group counts to monitor broad ( $\geq 30\%$ ) changes in deer abundance. ADF&G discontinued pellet surveys in Southeast Alaska after 2010, but historical survey results show that GMU 4 consistently had the highest pellet group counts in Southeast Alaska (Figure 2). Pellet group counts  $< 1.0$  groups/plot generally correspond to low density populations, 1.0 – 1.99 groups/plot to moderately dense populations and  $> 2.0$  groups/plot correspond to high density populations. Pellet group counts in GMU 4 are usually well above the high-density threshold and are often double the counts in other GMUs. This broad index of deer abundance suggests that the GMU 4 population remains at high levels with no indicators of depleted populations or conservation concerns. Pellet group surveys have not been conducted in the proposal area since the mid-1990s. The most recent surveys closest to the proposal area were in Port Althorp in 2001 (1.81 groups/plot).

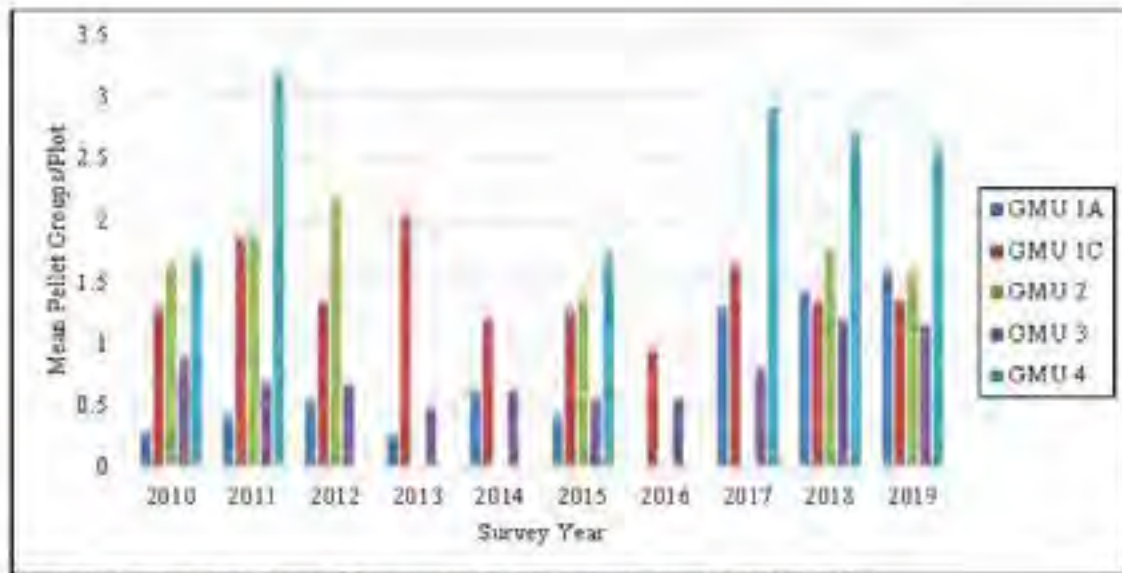


Figure 2. Mean number of deer pellet groups/plot for Southeast Alaska by GMU, 2010 – 2019.

In 2013, ADF&G began evaluating mid-summer aerial counts of deer in alpine habitats as an index of deer abundance. Surveys were conducted for two locations in GMU 4, Southern Admiralty Island (2015 – 2017) and Northeast Chichagof Island (2017-2018). The findings of those surveys were summarized as deer counted per hour of survey time (Figure 3).

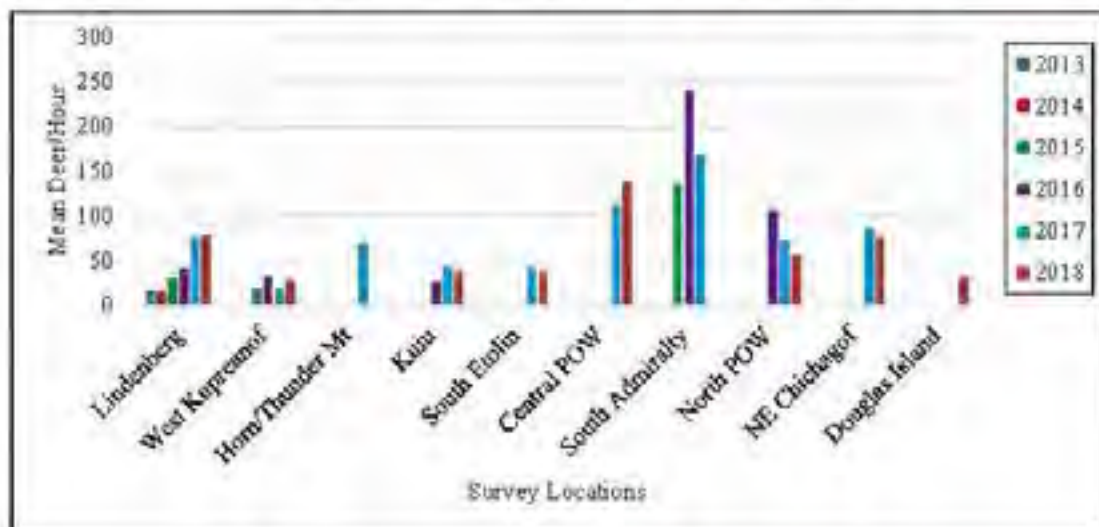


Figure 3. Mean number of deer counted per hour during mid-summer aerial alpine deer surveys in Southeast Alaska, 2013 – 2018.

In August 2023 ADF&G conducted a minimum count aerial survey of alpine habitat in the Pelican/Lisianski area on two successive evenings. The survey area included alpine habitat south of Lisianski Inlet and east of Lisianski Strait and Stag Bay to Whitestripe Mountain as well as

alpine habitat north of Lisianski Inlet to Idaho Inlet (Figure 4). A relatively large proportion of the alpine area surveyed was marginal deer habitat composed of extremely steep and rocky terrain. In addition, survey conditions were good but not ideal with sun glare and deep shadows inhibiting observation at times. Despite the challenges, 81 deer/hour of survey time were spotted, indicating that deer were abundant in the survey area, particularly in high quality habitat.



Figure 4. August 21-22, 2023, aerial alpine deer survey route

ADF&G biologists in GMU 4 began conducting late winter beach mortality transects in the early 1990s. These surveys are an indicator of mortality resulting from severe winter conditions, which is the most limiting factor for Sitka black-tailed deer populations in GMU 4. In addition to the total count of carcasses per mile, the proportion of buck, doe and fawn mortalities also indicates winter severity. Usually fawns die first, followed by adult males and then adult females. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Note the high number of carcasses found during spring 2007 surveys (Figure 5). In the years since then, few carcasses were found indicating high over-winter



survival and no significant population declines related to winter severity. Due to early and deep snow accumulations during December 2021, and in response to federal proposals to limit hunting by NFQU, in spring 2022 ADF&G made a concerted effort to conduct mortality surveys throughout GMU 4. Two surveys were conducted near the proposal area (Port Althorp and Stag Bay). Biologists counted zero mortalities on these surveys, lower than the overall GMU 4 count. Survey results for 2023 were among the lowest on record with 0.08 mortalities/mile. ADF&G biologists observed high numbers of deer including a high percentage of short yearlings during spring 2023 body condition surveys, which corroborated high overwinter survival.



Figure 5. Mean number of winter-killed deer per mile of beach surveyed in GMU 4, 2007-2023.

Taken together, these indices of deer abundance (pellet surveys, alpine counts, mortality transects) indicate that the GMU 4 deer population is high and stable. None of these indices suggests a decline in deer abundance or a conservation concern for the GMU 4 population. Based on observations of browsing levels, ADF&G biologists think deer populations in some areas of GMU 4 may be at or near carrying capacity and plan to recommend hunters include does in their Unit 4 bag limit for RY23.

#### Trends in GMU 4 Hunter Effort and Harvest

ADF&G biologists also use harvest as an indicator of trends in the deer population. Harvest data allow ADF&G to monitor harvest by specific communities and by geographic units known as Wildlife Analysis Areas (WAAs). ADF&G estimates hunter effort and harvest using information provided by hunters including hunters from Pelican. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Prior to 2011, ADF&G mailed survey forms to one third of the hunters in each community who obtained harvest tickets. Since 2011, harvest tickets have come with a mandatory reporting requirement. People who obtain harvest tickets are required to report whether they (or a proxy or federal designated hunter) hunted or not. Those who did hunt are required to report where they hunted, days of hunting effort, and information about the deer they harvested.

From 1997 – 2022 the estimated average annual harvest in GMU 4 has been 5,605 deer taken by 3,253 hunters (Figure 6). GMU 4 supports the highest deer harvest in the state with harvest

remaining stable between 5,000 – 7,000 deer annually. The exception being the severe winter of 2006/2007 when high harvest was followed by a significant over-winter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,734 deer in RY06 to 1,933 deer in RY07. Based on harvest and other indicators of deer abundance, managers believe the GMU 4 deer population had fully recovered by the 2013 season.

More recently, hunter participation and harvest data reported to ADF&G for RY22 (fall 2022) indicated substantial declines in both the number of hunters and deer harvested in GMU 4. When fewer people hunt, fewer deer are harvested, but the decline in the number of people who obtained harvest tickets and reported hunting in GMU 4 was unexpected, particularly when deer remain abundant.

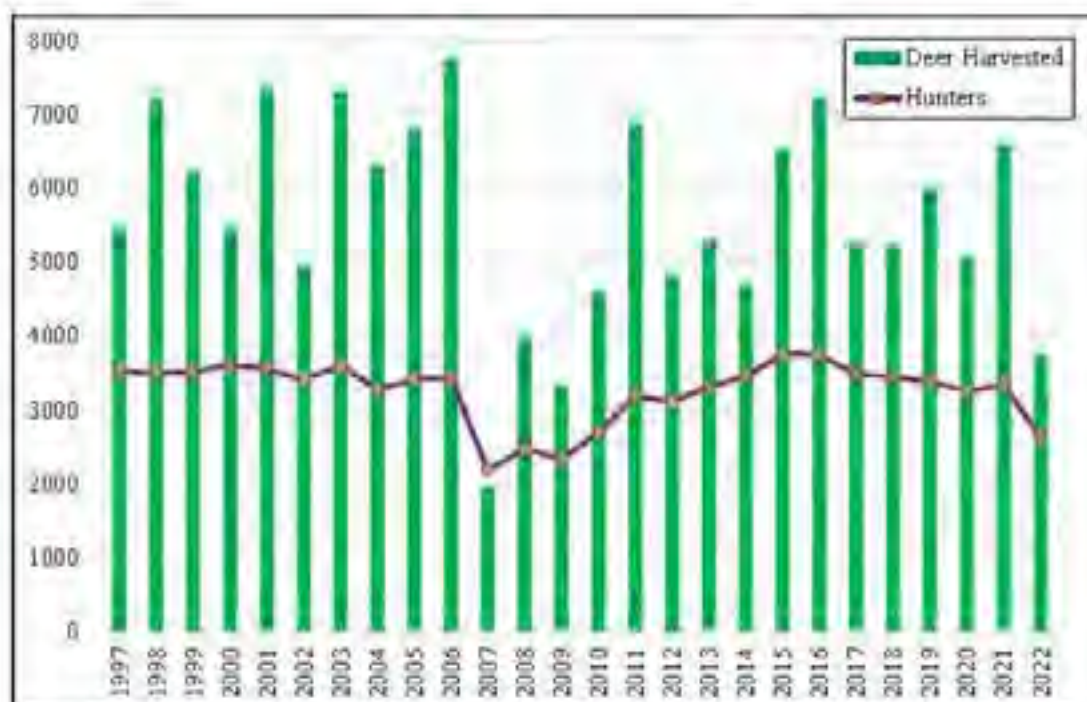


Figure 6. Number of people hunting deer and estimated deer harvest for GMU 4, RY97 – RY22.

#### Trends in Hunting Effort and Harvest for Pelican Residents

The proposal asserts that Pelican residents are having trouble meeting their subsistence needs for several reasons, including competition and user conflict with NFQUs. Although the proposal targets the Lisianski area specifically, any deer taken by Pelican residents would be considered part of their subsistence take, so we analyzed total GMU 4 harvest by Pelican residents and harvest within the proposal (analysis) area indicated in Figure 1.

As noted above, the winter of 2006-07 was the most severe on record with high deer mortality in GMU 4. The years following that winter saw sharp declines in hunter effort and deer harvest followed by gradual recovery with full recovery by RY13. The period following the winter of

2006-07 also appears to have coincided with long-term changes in participation, effort, and harvest by Pelican deer hunters. We use two 10-year comparison periods before and after the record winter of 2006-07 to illustrate those changes. The first period is from RY97 to RY06, and the second period is from RY13 to RY22.

Reports by Pelican hunters indicate a declining trend in harvest for Pelican residents (Figure 7). From RY97 to RY06 Pelican residents harvested an average of 91 deer annually in GMU 4. Harvest declined to 20 deer in RY07 because of the severe winter of 2006/2007. Since 2013, when ADF&G considered the deer population fully recovered, harvest has averaged 57 deer annually, a 37% decline from the earlier period.

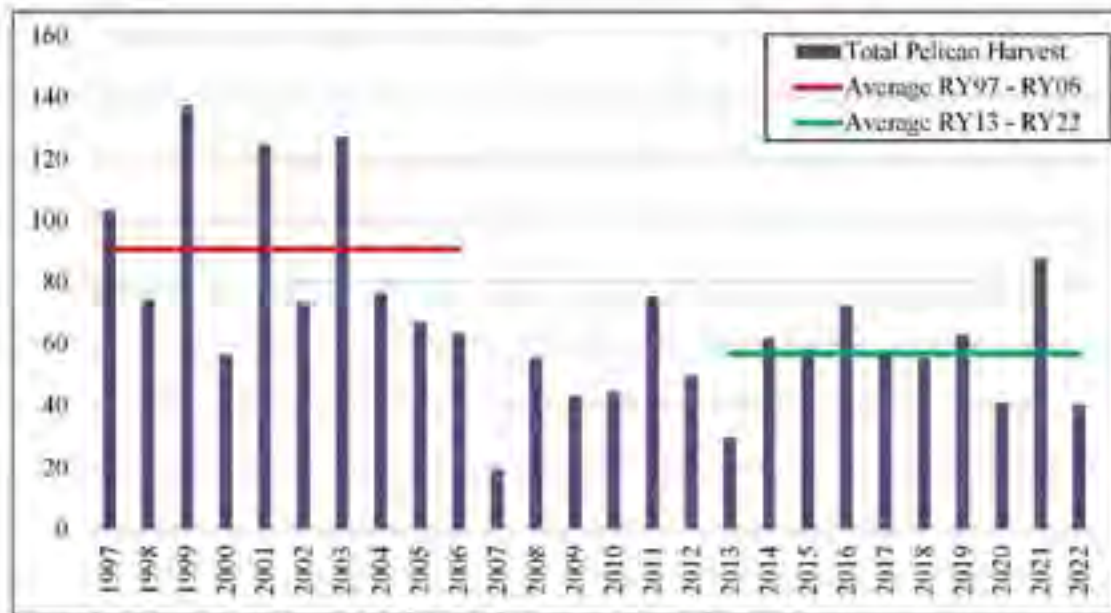


Figure 7. Total number deer harvested in GMU 4 by Pelican residents, RY97 – RY22.

To evaluate potential reasons for the decline in deer harvest we examined trends in the number of Pelican hunters and days of hunting effort by those hunters. Since 1997, the number of Pelican hunters has declined (Figure 8). From RY97 to RY06 an average of 34 (range 20 – 49) hunters participated each season. Since RY13 an average of only 22 (range 13 – 27) Pelican residents have hunted deer annually, a 35% decline from the comparison period.

The number of Pelican residents who obtained harvest tickets corroborates the decline in Pelican residents who reported hunting deer. To hunt deer or have someone hunt deer for you under the State proxy or the federal designated hunter programs, individuals are required to obtain harvest tickets. In Pelican there has been a declining trend in the number of residents who have obtained deer harvest tickets (Figure 9). From RY97 to RY06, an average of 50 Pelican residents obtained deer harvest tickets with a high of 61 in RY98. Since RY13, that number has dropped to an average of 35 individuals with as few as 19 in RY13, a 30% decline. The declining number of Pelican hunters is not surprising given that US Census data indicate the population of Pelican has declined by 40% since the year 2000.



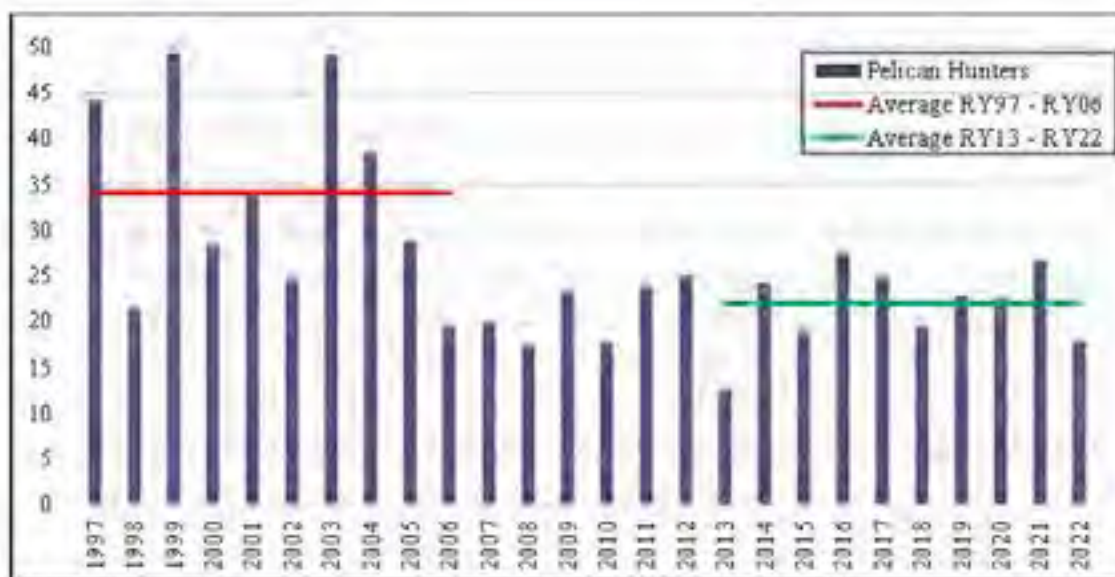


Figure 8. Number of Pelican residents who reported hunting deer in GMU 4, RY97 – RY21.

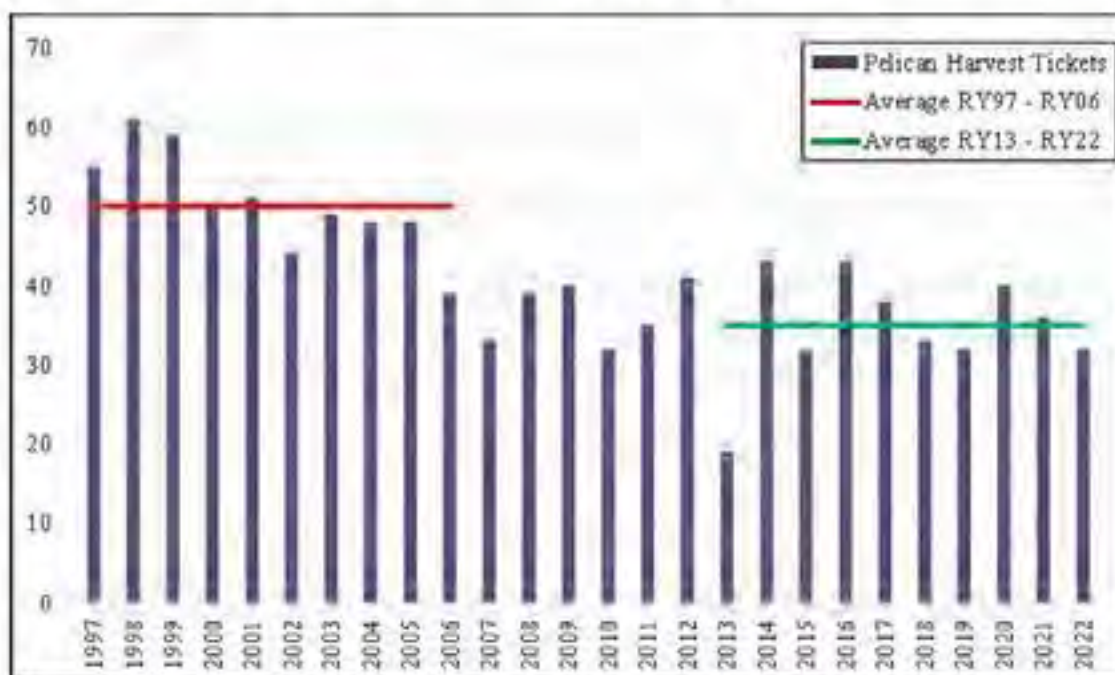


Figure 9. Total number of Pelican residents who obtained deer harvest tickets, RY97 – RY22.

The decline in the number of Pelican residents hunting deer doesn't fully explain the decline in deer harvest, so we also examined hunting effort. From RY97 to RY06 Pelican residents reported hunting an average of 150 days annually or 4.4 days per hunter. Since RY13, Pelican hunters



report spending only 71 days afield each year or 3.2 days per hunter (Figure 10). This is a 53% decline in the number of days of hunting effort by Pelican residents. Continued high abundance of deer along with hunter participation and effort data reported to ADF&G by Pelican residents clearly indicate that the decline in the Pelican's deer harvest is a function of fewer hunters expending less effort.

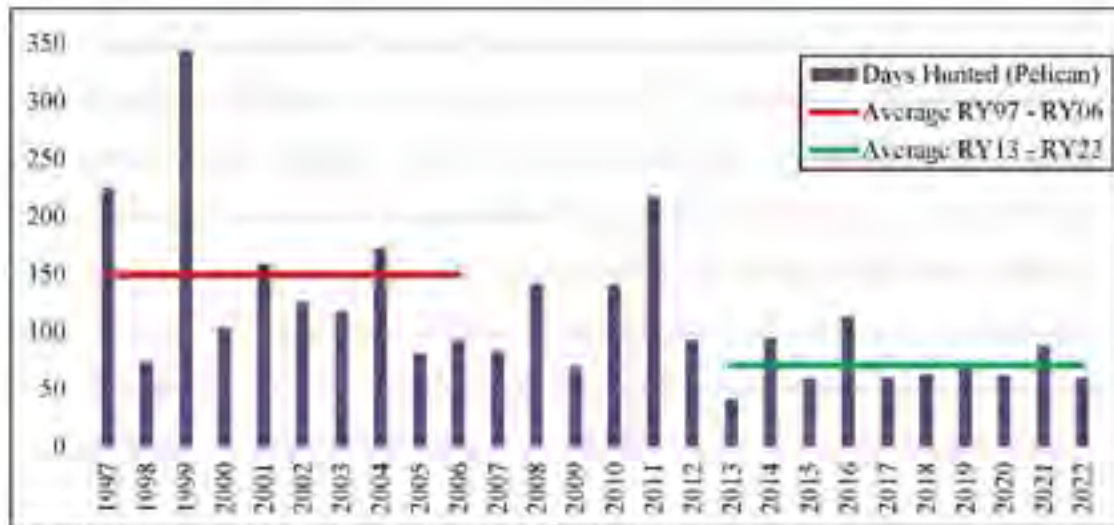


Figure 10. Days hunted by Pelican residents in GMU 4, RY97 – RY21.

#### Trends in Pelican Hunter Efficiency

Hunter efficiency, or the days of hunting effort required to harvest one deer is another indicator of the ability of hunters to meet their subsistence needs. Long-term trends indicate that Pelican residents have been very effective at harvesting deer. That has not changed. Between RY97 and RY06, Pelican residents required 1.6 days of hunting effort for every deer harvested. Since RY13, Pelican residents have reported needing only 1.3 days of effort for every deer. According to their own reports Pelican hunter efficiency has actually improved over the last decade, and Pelican residents in general are experiencing extremely efficient deer hunting. If competition was resulting in reduced hunting success, we would expect to see an increase in the days of effort required for Pelican hunters to harvest a deer and a corresponding increase in the number of non-Pelican hunters but reports from Pelican hunters show the opposite to be true.

Compared to deer hunter effort required to harvest a deer in other GMUs, Pelican residents are extremely efficient. For comparison, hunters on Prince of Wales Island (GMU 2) average 4.1 days of hunting effort per deer harvested. Cordova (GMU 6D) averages 2.9 days/deer. Kodiak (GMU 8) averages 3.7 days/deer, GMU 1A (Ketchikan area) averages 4.6 days/deer, GMU 3 (Petersburg/Wrangell) averages 5.9 days/deer, and in GMU 1C (Juneau area) hunters average 7.9 days/deer (ADF&G 2013 – 2022). The average effort across GMU 4 required to harvest one deer is 2.4 days. The effort required by Pelican residents to harvest one deer in GMU 4 is lower than anywhere in Alaska (Figure 11).

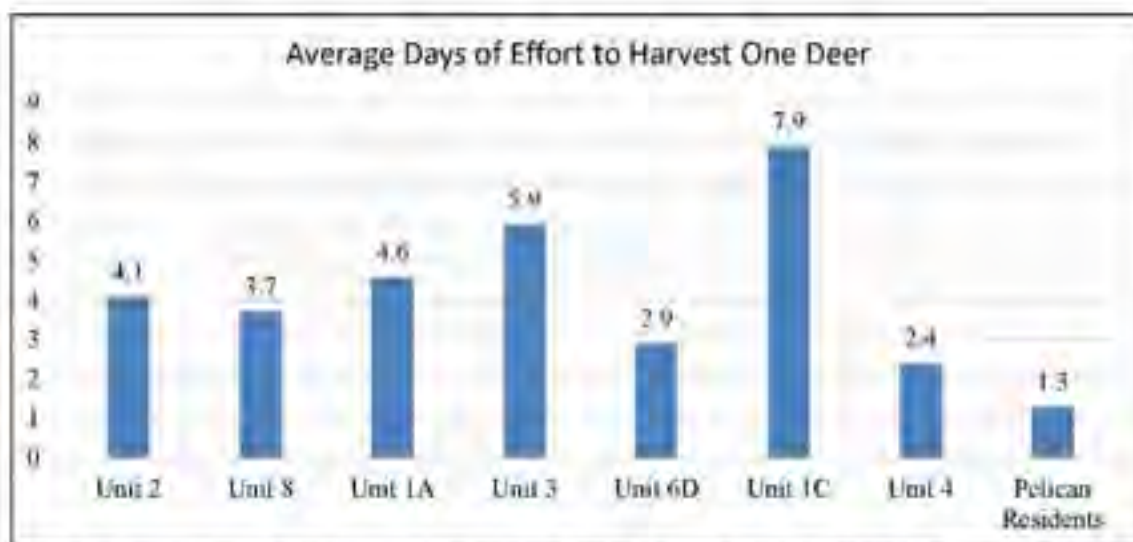


Figure 11. Average hunting days required to harvest one deer in Southeast Alaska, RY13-RY22.

While deer harvest by Pelican residents has declined, abundance indices indicate that the deer population is at high levels and hunter efficiency is high and as good or better than it has been historically. This indicates that declining harvest by Pelican deer hunters is a product of declining hunter participation and effort.

#### Pelican Hunter Harvest in the Analysis Area (WAAs 3417, 3418, 3419, and 3421)

We examined hunter effort and harvest for the proposal area to quantify potential effects of competition and the importance of the proposal area for meeting the subsistence needs of Pelican residents. Because we believe it is unlikely that Pelican residents differentiate between NFQUs and FQUs from other communities (i.e., residents of Sitka, Hoonah, Gustavus, etc.) we separately summarized data for non-Pelican FQUs. Those hunters would not be affected by the current proposal.

WAAs are the smallest geographic unit available for data analysis. The proposal area intersects four WAAs but does not correspond to WAA boundaries. Therefore, our analysis area depicted in Figure 1 is larger than the proposal area and includes WAAs 3417, 3418, 3419, and 3421.

Our analysis shows that the analysis area is highly important to residents of Pelican for meeting their subsistence deer needs. However, both the number and proportion of Pelican residents who hunt deer in the analysis area and elsewhere in GMU 4 have declined. Between RY97 and RY06 an average of 32 Pelican hunters reported hunting in the analysis area each year, and from RY13 to RY22 an average of only 17 Pelican hunters reported hunting in this area, a nearly 50% decline. From RY97 to RY06, 94% of Pelican residents who hunted deer in GMU 4 hunted in the analysis area. From RY13 to RY22 that proportion declined to 77%.

Over the last 25 years, about 75% of Pelican's total GMU 4 deer harvest has come from the analysis area, but harvest patterns reported by Pelican residents have also changed. From RY97

to RY06 the analysis area accounted for 82% of Pelican's total GMU 4 harvest. Since RY13, that proportion has declined to only 60% of Pelican's GMU 4 deer harvest. Fewer Pelican residents report hunting deer in the analysis area, a lower proportion of Pelican deer hunters report hunting in the analysis area, and the proportion of Pelican hunter's total deer harvest from the analysis area has declined by 22%.

Any NFQU or FQU hunting deer in the Pelican area who does not live in that community is likely perceived as competing with Pelican hunters. The number of NFQUs hunting in the analysis area has remained stable between the RY97 – RY06 and RY13 – RY22 comparison periods with annual averages of 54 and 58 hunters, respectively (Figure 12). The average number of non-Pelican FQUs hunting within the analysis area declined by 40% between the comparison periods (from 72 to 43) (Figure 13). Between the two comparison periods the average number of non-Pelican deer hunters hunting in the analysis area has declined from 126 to 101 and the number of Pelican residents from 34 to 22 for an overall average decline of 37 hunters or 23% in the analysis area.

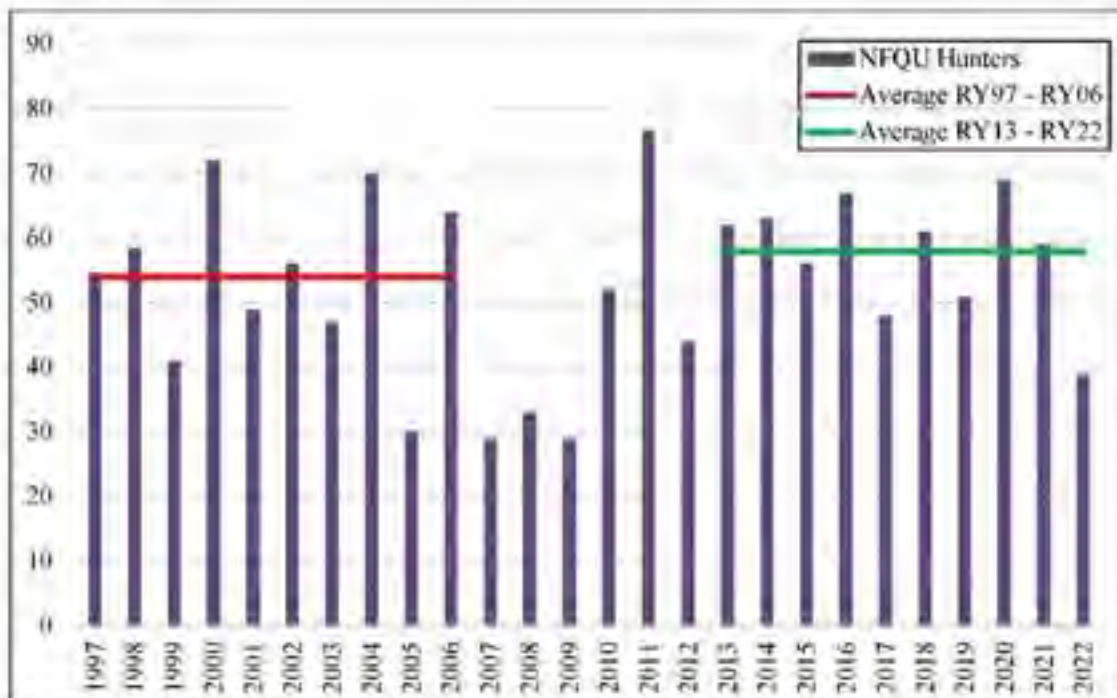


Figure 12. Number of NFQU's who reported hunting deer within the analysis area, RY97 – RY22.



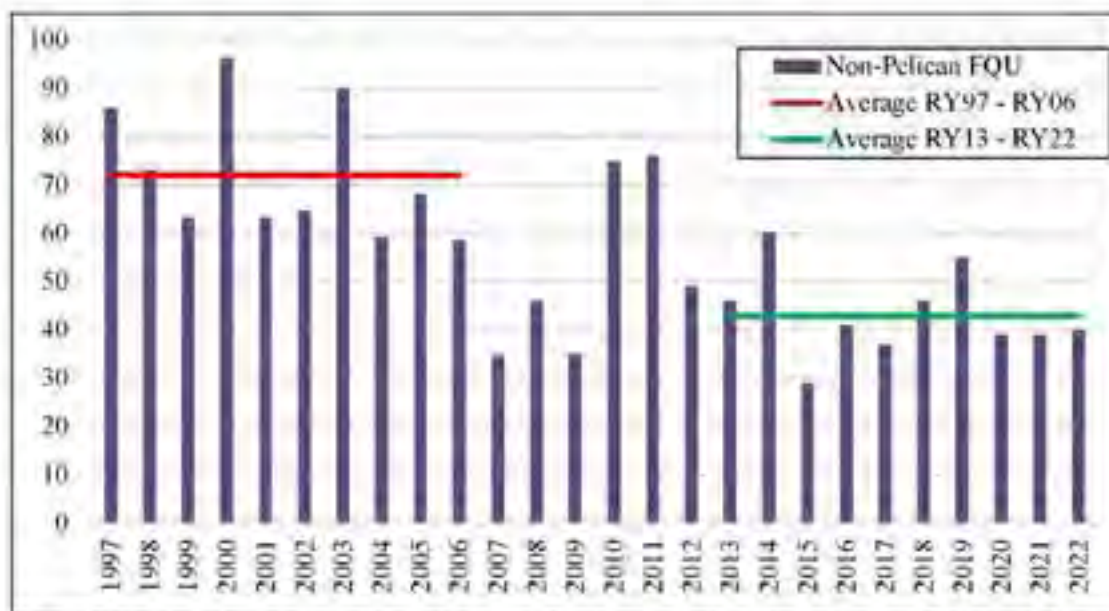


Figure 13. Number of non-Pelican FQUs who reported hunting deer within the analysis area, RY97 – RY22

Days of hunting effort by hunters living outside of Pelican has also declined. Although there has been a slight upward trend in the number of NFQUs hunting in the analysis area (~7%), the number of hunter days by this user group has declined from an average of 304 days of hunting effort (5.6 days/hunter) during RY97-RY06 to an average of 267 days of hunting (4.6 days/hunter) during RY13 – RY22 (Figure 14). Between the comparison periods, total days of hunting effort by FQUs residing outside Pelican also declined from an average of 240 days hunted (3.3 days/hunter) to 175 days hunted (4.1 days/hunter) (Figure 15). Between the comparison periods the days of hunting effort in the analysis area by all hunters residing outside of Pelican declined by 19%.



Figure 14. Number of NFQU hunt days within the analysis area, RY97 – RY22.

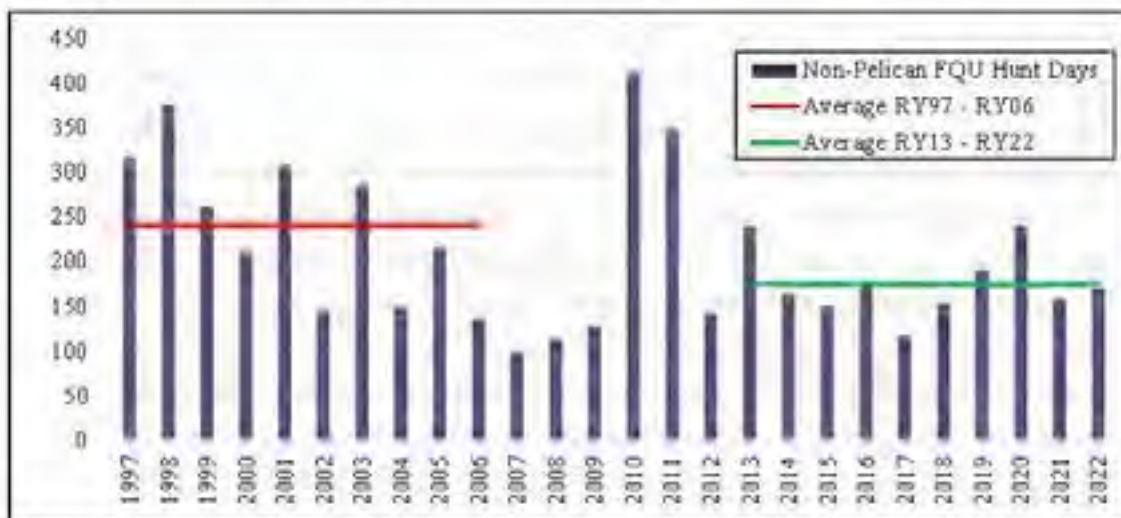


Figure 15. Number of non-Pelican FQU hunt days in the analysis area, RY97 – RY22.

Next, we looked at hunter efficiency (the days of hunting effort required to harvest one deer) for Pelican deer hunters within the analysis area to see if we could quantify any declines in efficiency that could be related to competition from NFQU hunters. From RY97 to RY06, Pelican hunters hunted for an average of 133 days to harvest an average of 75 deer, or 1.8 days/deer. Since RY13 Pelican hunters reported hunting for an average of 40 days per year to harvest an average of 34 deer, or 1.2 days/deer. According to their own reports, Pelican hunter efficiency has actually improved over the last decade. If competition resulted in reduced hunting success, we would expect to see declining hunting efficiency and a corresponding increase in the number of non-Pelican hunters. Instead, Pelican residents report extremely efficient hunting while the number of non-Pelican-based hunters has been stable and days of hunting effort by that group is declining.

#### Hunt Chronology

Mid-October through early December is the most popular time for all hunters to pursue deer in GMU 4. Deer activity coinciding with the rut as well as winter snows that push deer to beaches make for more successful hunting than earlier in the season. For all hunters in GMU 4 from RY13 to RY22, November accounted for 40% of the hunters, 50% of the hunt days, and 44% of the harvest. Hunters report hunting effort and harvest by month, so data can only be summarized by month (Table 1).

Table 1. GMU 4 deer hunting chronology of harvest and effort for all hunters as both numbers and percentage of total, RY13 – RY22.

	<u>Hunters</u>		<u>Days</u>		<u>Deer</u>	
	<u>Hunters</u>	<u>%</u>	<u>Hunted</u>	<u>%</u>	<u>Harvested</u>	<u>%</u>
August	3,907	8	7,539	6	3,054	6
September	4,133	9	8,658	7	3,939	8
October	7,573	16	17,375	14	7,038	14
November	18,667	40	59,428	50	22,865	44
December	10,041	22	23,727	20	12,039	23
January	1,901	4	3,439	3	2,561	5
<b>Total</b>	<b>46,222</b>		<b>119,966</b>		<b>51,496</b>	

We analyzed hunt chronology for only Pelican residents to determine the importance of the November 1 – 15 period for meeting their subsistence needs. Indeed, November is an important month for hunting by Pelican residents, with numbers very similar to GMU 4 as a whole. November accounts for 44% of the hunters, 49% of the hunter days, and 47% of the harvest for Pelican residents. Because our harvest statistics are only compiled by month, we are unable to break out the Nov. 1 – 15 period, though a logical assumption would be that it accounts for roughly one-half of the November activity (Table 2).

Table 2. GMU 4 deer hunting chronology of harvest and effort for Pelican residents as both numbers and percentage of total, RY13 – RY22.

	<u>Hunters</u>		<u>Days Hunted</u>		<u>Deer Harvested</u>	
		<u>%</u>		<u>%</u>		<u>%</u>
August	8	2	22	3	7	1
September	30	8	66	9	32	5
October	59	17	133	19	78	14
November	154	44	347	49	265	47
December	96	27	137	19	176	31
January	7	2	7	1	11	2
<b>Total</b>	<b>354</b>		<b>712</b>		<b>569</b>	

#### Background Summary

We presented ADF&G's deer abundance survey data and deer hunting effort and harvest data provided to ADF&G by GMU 4 hunters including Pelican residents. To gauge changes in measures of hunter effort and harvest we compared the decade prior to the severe winter of 2006-07 with the decade since 2013 when the deer population was considered recovered. Those comparisons support the following conclusions:

1. Deer remain abundant in the proposal area. Deer pellet group transects, aerial alpine surveys, and late winter mortality surveys all indicate that in GMU 4 deer occur at among the highest densities in the state. Consequently, there is no need to restrict take by NFQUs to either conserve the deer population or to ensure continued subsistence use of the deer population.
2. Although the number of NFQUs hunting deer in the analysis area has increased slightly (+7%), that increase is small and offset by a decline in use of this area by hunters from other federally qualified communities. Total hunting pressure in the area is light. In the last decade FQUs have been expending considerably less effort, so total hunting pressure in the proposal area is declining. It is also likely that some of the NFQUs hunting in the proposal area are former Pelican residents who moved to Juneau for employment or other opportunities but return to hunt with and on behalf of relatives and friends in Pelican.
3. The average number of Pelican residents participating in deer hunting each year and the days of hunting effort by those hunters have declined. Between the two comparison periods the average number of Pelican residents who obtained deer harvest tickets declined by 30%, reported hunting declined by 35%, and **the days of hunting effort reported by Pelican residents declined by 53%**. That dramatic decline in hunting effort is the reason deer harvest by Pelican residents has declined, not competition from NFQU hunters.
4. The days of hunting effort Pelican hunters require to harvest one deer remains very low at 1.2 days of hunting per deer harvested. The proposal emphasizes that subsistence hunters need to be efficient, and this is among the most efficient hunting anywhere in Alaska.

#### Impact on Subsistence Users

The proposed Nov. 1 – 15 closure would reduce the already very low level of competition between Pelican residents and NFQUs in the closure area. However, NFQUs would still be able to hunt adjacent state-owned tidelands and nonfederal uplands. The proposed closure will not



reduce competition between Pelican residents and FQUs from other Southeast communities. If any NFQUs excluded from hunting during the proposed closure have ties to Pelican and normally share meat with family and friends who reside there, the proposed closure could have the unintended consequence of reducing the amount of deer meat available to Pelican residents.

#### **Impact on Other Users**

Opportunity for NFQU to harvest deer on federal public land within the proposed closure area would be reduced. Since RY13 an average of 58 NFQUs have harvested 97 deer annually in the analysis area. Applying the percentage of GMU 4 hunters who hunt during November, we estimate that on average the proposed closure would prevent 12 NFQU hunters from harvesting 21 deer annually within the analysis area during Nov. 1 – Nov. 15. Some NFQU hunters are likely former residents of Pelican who moved to federally designated non-rural areas for economic, health, or education reasons but return to Pelican to hunt and partake in their traditional subsistence practices.

#### **Opportunity Provided by State**

The season and bag limits for deer in GMU 4 *Remainder* including the Lisianski are:

	<b><u>Bag Limit</u></b>	<b><u>Open Season</u></b>
Residents	Six deer (bucks only to September 14)	August 1 – December 31
Non-Residents	Two bucks	August 1 – December 31

**State customary and traditional use findings:** The Alaska Board of Game has made a positive customary and traditional use finding for deer in GMU 4.

**Amounts Reasonably Necessary for Subsistence (ANS):** Alaska state law requires the Board of Game to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for deer in GMU 4 is 5,200 – 6,000 deer. The ANS was established in 1992.

#### **Conservation Issues**

There are no conservation issues for the deer population in GMU 4. Following a decade of mild winters, the available population indices suggest the GMU 4 deer population remains high and stable. In fact, managers in GMU 4 will be encouraging hunters to include does as part of their RY23 bag limit as deer populations may be at or near carrying capacity in some watersheds. Deer harvest remains within the historical range and state ANS is met in most years. Population

indices and measures of hunter effort and success indicate that GMU 4 has the highest population of deer and highest hunting success of anywhere in the state.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters and field observations by management biologists we conclude that there is no conservation concern for the GMU 4 deer population. The proponent also conceded that there is no conservation concern for GMU 4 deer at the January 2023 Federal Subsistence Board meeting.

#### **Enforcement Issues**

Passage of this proposal will create increasingly complex regulations for NFQUs. Enforcement will be challenging because NFQUs will remain eligible to hunt deer on state-owned tidelands, lands below the line of mean high tide and on nonfederal uplands. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are harvested above or below that line of mean high tide. Further, brown bear season will still be open in the proposal area making it difficult for enforcement to tell which species hunters are targeting. Since Pelican residents may not be able to differentiate between NFQUs and non-local FQUs, reports to law enforcement of NFQUs hunting in the proposal area may be in error.

## WRITTEN PUBLIC COMMENTS

7/25/23, 7:02 PM

Hsieh - McKinney, Keyna T - Outlook

Fw: (EXTERNAL) Comments on Southeast Proposals

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:14 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Thursday, July 6, 2023 8:51 AM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] Comments on Southeast Proposals

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From: Ryan Beason <rbeason14@gmail.com>  
Sent: Saturday, July 1, 2023 1:46 PM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Comments on Southeast Proposals

<https://doi.org/10.1016/j.jmb.2019.04.004>

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7/5/23, 2:02 PM

Mail - McKinney, Kayla T - Outlook

WP24-06 (Quadrangle Administrative)  
 WP24-05 (Hammock Area 2 (HCCIA))  
 WP24-06 (Pelican Area / (Hammock Area))  
 WP24-05  
 WP24-05

1/1/2023 Outlook

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7/1/23, 10:52 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:29 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Tuesday, June 27, 2023 1:33 PM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

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**From:** art dunn <adunn1848@gmail.com>  
**Sent:** Sunday, June 25, 2023 5:25 PM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Proposals to limit deer hunting in SE Alaska

This email has been received from outside of DOI. It is possible that any findings or conclusions regarding this information are preliminary.

I am sending you information regarding a proposed rulemaking. You are invited to comment on this rulemaking.

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7/17/23, 10:52 AM

Mail - McKinney, Kayla T - Outlook

I happen to be a rural resident who has hunted in all of the areas described in these proposals. In over 40 years of hunting in these areas I have never seen any conflicts between subsistence and sport hunters that could be characterized as competitions. On the other hand, I have witnessed violations of the hunting regulations by subsistence hunters, such as hunting from watercraft, shooting on or across roads, and hunting after dark using spot lights.

I have just finished an overview of 36CFR42 and do not find any mention of competition as a reason to restrict hunting opportunity for non-rural hunters on Federal lands.

Sincerely,

Arthur J. Dunn

<https://outlook.office365.com/mail/inboxid/AAGkADg4NGE1/TUMWJND8PNDAXY04M/hslTkwYJ46M2JYTYkwYgAQAUyTgDD7VLN8Hthwug%3D> 2/2





7/5/23, 4:03 PM

Mail - McKinney, Kayla T - Outlook

I am a 30-year-old resident and avid deer hunter. I mainly hunt in Tanana valley and on Seward Peninsula. I am writing to express opposition to proposals WP24-04, WP24-05, and WP24-06. These proposals are largely similar to proposals that have been submitted and have failed in recent years. I would urge the COM to reject these proposals on the same grounds that the previous proposals failed. They are wholly unnecessary.

Thank you for considering my comments.

John Brehm  
 Tanana, Alaska

<https://outlook.office365.com/mail/inboxid/AAGkADg4NGE1/TUMWJNDEPNOAxyD4M/hslTkwYJ4M2JfYTKwYgAQAMxzJObMv4SEJhA%2BTsWQ77...> 2/2

7/25/23, 3:34 PM

Mail - McKinney, Kyrin T - Oshon

Fw: [EXTERNAL] Comments wp24-04, wp 24-05, wp24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:18 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Friday, June 30, 2023 3:28 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Comments wp24-04, wp 24-05, wp24-06

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From: Go Hawks <kennethstevens80@gmail.com>  
Sent: Friday, June 30, 2023 9:46 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Comments wp24-04, wp 24-05, wp24-06

This work has been submitted to the journal *Journal of Management Inquiry* and is subject to the journal's editing and publishing process.

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7/8/23, 3:34 PM

Mail - McKinney, Kayla T - Outlook

As a former Hoonah resident born and raised who is currently working and residing in Juneau I am writing in opposition to the above listed proposals. I mainly hunt and gather in Hoonah and Tenakee and feel these proposals would limit my ability to hunt and gather. Please reject these proposals on the grounds that previous proposals have been rejected by the OSM. They are unnecessary and not needed. The abundance of deer in southwest ABC Islands is at an all time high deeming these proposals unnecessary. Thank you for your consideration in this matter.

Fen Brown  
Juneau

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1TUMWJNDkNDQxYD4MjhlTkwYjA4M2JlYTkwYgAQAPJ2NoOC1LMuQAY8BuzhuM...> 2/2

7/6/23, 4:02 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Response to WP04 4 thru 6

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:21 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Wednesday, June 28, 2023 11:07 AM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] Response to WP04 4 thru 6

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**From:** Thomas Chapin <garnetstreet@icloud.com>  
**Sent:** Tuesday, June 27, 2023 6:22 PM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Response to WP04 4 thru 6

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7/9/23, 4:02 PM

Mail - McKinney, Kayla T - Outlook

This is a condition brought on by road hunting. Perhaps we should consider fair chase and the sport itself....

Implement the half mile from the road rule and bring an end to this discussion..

People who hunt in these areas choose to road hunt. And it seems that Hoonah has the most complaints and the most roads...

Road access has been a deciding factor in previous game management decisions and should be considered in this situation. Hoonah's road system (logging roads) are bordered by little more than clear cut areas.

Shooting from a vehicle is not fair chase and is far from sportsmanship!!!

To enjoy any benefits from our resources we must first respect them and fair chase regardless of any entitlements or claims.

Thank you for this opportunity to respond....

Sent from my iPhone

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7/25/23, 4:10 PM

Maas - McKinney, Kyrle T - Outlook

Fw: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:25 PM

To McKinney, Kayla T <kayla\_mckinney@fws.gov>

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FAX: (907) 786-3898  
theo\_motuszkowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:57 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

Office of Subsistence Management  
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1011 E Tudor Rd, MS 121  
Anchorage, AK 99503-6199

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(907) 786-3898 fax

Website: <https://www.dol.gov/subsistence>  
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From: MATTHEW CRESWELL <[micreswell@gmail.com](mailto:micreswell@gmail.com)>  
Sent: Tuesday, June 27, 2023 8:38 AM  
To: AK Subsistence, FW7 <[subsistence@fws.gov](mailto:subsistence@fws.gov)>  
Cc: [matthew.creswell@juneau.gov](mailto:matthew.creswell@juneau.gov) <[matthew.creswell@juneau.gov](mailto:matthew.creswell@juneau.gov)>  
Subject: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Change

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Gold Mine

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7/5/23, 4:10 PM

Mail - McKinney, Kayla T - Outlook

I am writing to voice my opposition to the proposed changes to allowing tundra area hunters to access WIND 04, 05, 06.

I am an avid deer hunter and I believe it is extremely unfair to say that public lands should be set aside for a specific user group. These lands are for everyone to enjoy, not just people who live in the area. This is the saying that people from Hoonah can't come to tundra and visit the Mendenhall Glacier. This is a bad way to manage public lands and I believe it should not be allowed to pass.

Thank you for your time.

Kyatt Crossen  
Hoonah

<https://outlook.office365.com/mail/inboxid/AAGkADg4NGE1/TULWJNDEPNDAXYD4M/hn1kwyJA4M2JY1kwygAQAL4OEUF%2F1yqN%2Bago0d6> 2/2



7/23, 4:15 PM

Khalil - McKinney, Keyla T - Outlook

Fw: (EXTERNAL) Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2021 12:25 PM

To: McKinney, Kayla T <kayla.mckinney@fws.gov>

**Theo Motuskowski**  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudar Road, MS 131  
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Office: (907) 786-3867  
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FAX: (907) 786-3898  
theo.motuskowski@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:53 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

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From: John DeMuth <jdemuth@pndengineers.com>  
Sent: Monday, June 26, 2023 5:37 PM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

This work has been funded from a grant of DOR – Emergency Relief Funding (2016), awarded to the author, as requested.

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7/5/23, 4:15 PM

Mail - McKinney, Kayla T - Outlook

The following is in response to the latest round of prejudice proposals being considered to restrict only people who reside in Juneau, Alaska from being able to hunt deer in select, nearby areas. As before, these proposals are not based on data, facts or truth as was pointed out by the ADFG who put out a YouTube video that very effectively debunked any notion that Juneau hunters are having any significant impact to deer populations in these communities. Data and facts have always pointed to weather as the reason for deer population fluctuations – in Southwest Alaska and Kodiak.

Weather also is the main hinderance to hunters being able to get into the field. Couple that with high fuel prices, and it is very evident that few folks can afford the time, expense and own vessels that are able to handle heavy seas and freezing spray in Chatham and Icy Straits during late winter months. The opposite side of the coin is true as well – subsistence hunters in these communities are not going to risk weather and spend money on fuel for traveling any significant distance from their community to bag meat for the freezer – and folks from outside the community are not interested in hunting near a community where residents have a longer season and regularly are hunting for their own food. Hence, drawing up maps that have such large “exclusion zones” makes no logical sense. For example, why does the exclusion area for Mooseh include the north shore of Tenakee Inlet? So anyone who owns a remote cabin in Freshwater Bay or Tenakee is not allowed to hunt near their own cabin?

I respectfully ask that these politically motivated, emotionally charged, and divisive proposals that have no factual basis (like “Juneau hunters will miss their shots at deer, causing them to be more skittish”) be once again rejected as bad policy that is not necessary and not supported by the ADFG, but instead is being pushed by native and non-native community lobby groups who are not interested in effectively managing public resources for the good of all users, but rather to selectively exclude some users based on their place of residence.

Respectfully,

John DeMuth  
Juneau, Alaska

<https://outlook.office365.com/mail/inbox/dAAQkA0g4NGE1TUXLWJND8NDAxY04M/h1.TkwyA4M2JYTKwygAQAN5wE7GZ0K%2Bg78ANR0Q...> 2/2



7/1/23, 10:39 AM

Mail - McKinney, Kayla T - Outlook

I am writing to voice my opposition to proposals WP24-04, WP24-05, WP24-06. Having been to all of the communities affected by these proposals, I firmly believe that these proposals are not needed. These proposals will also negatively affect tribes in other communities, some of which depend on the resource as much as residents in the smaller communities.

Thanks for the opportunity to comment!

Jason Piers

<https://outlook.office365.com/mail/inbox/id/AAGkADg4NGE1TjUxLWJhNDkxNDQxY04MjhlTkwYjA4MzJhYTkwYQAMbyyHsqPD0K3jyodfIMRMP%...> 2/2

7/10/23, 11:34 AM

Atari - McKinney, Kayla F - Outdoor

Fw: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:34 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Motuszkowski**  
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theo.motuszkowski@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Wednesday, June 21, 2023 10:41 AM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

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From: Wayne Hall <wayne240ak@gmail.com>  
Sent: Wednesday, June 21, 2023 9:24 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

<https://doi.org/10.1002/for>

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7/17/23, 11:34 AM

Mail - McKinney, Kaysa T - Outlook

I oppose the three following federal proposals, WP24-04, WP24-05, and WP24-06, because they are not necessary nor are they based on any quantitative data, only speculation and opinion of one interest group. The claim that the presence of Bureau hunters during Nov 1 - Nov 15 is causing rural residents to not be able to harvest deer is not based on any factual data. Examples of arbitrary (unsubstantiated) statements in the proposal include:

WP24-06

To the make the statement "This proposal is necessary for public safety..." is disingenuous and has no basis of fact.

"Non-federally-qualified users flock to Hoonah..." Again, this is an arbitrary statement that has no data to back up one person's view.

Similar statements are seen throughout proposals WP24-04 and WP24-05 as well.

I oppose all aspects of the three proposals.

Respectfully,

Wayne Hall

Hoonah resident

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7/8/23, 4:20 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM &lt;theo\_matuskowitz@fws.gov&gt;

Thu 7/6/2023 12:26 PM

To: McKinney, Kayla T &lt;kayla\_mckinney@fws.gov&gt;

*Theo Matuskowitz*  
*Supervisory Regulations Specialist*  
*US Fish and Wildlife Service*  
*Office of Subsistence Management*  
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*theo\_matuskowitz@fws.gov*

---

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>

Sent: Tuesday, June 27, 2023 1:52 PM

To: Matuskowitz, Theo TM &lt;theo\_matuskowitz@fws.gov&gt;

Subject: Fw: [EXTERNAL] WP24-04, WP24-05 and WP24-06

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From: Brandon Ivanowicz <bivanowicz@pndengineers.com>

Sent: Monday, June 26, 2023 2:00 PM

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

Subject: [EXTERNAL] WP24-04, WP24-05 and WP24-06

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7/5/23, 4:20 PM

Mail - McKinney, Kayla T - Outlook

denied because they were based on anecdotal opinion of the animal population and not on scientific data. With a finding the previous proposals were data-based, and that any decrease in subsistence deer hunting success will due to decreases in subsistence deer hunting effort & purchase of hunting licenses, and not in the availability of animals in which current research indicates populations are high. Please revoke or deny this proposal because it again is based on unfounded claims. It is important that all Alaska residents continue to have access to hunt on state owned public lands, particularly the areas referenced in the above proposals.

Brandon Ivanowicz

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7/17/23, 11:21 AM

Mail - McKinney, Kayla F - Chalco

Fw: [EXTERNAL] WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:53 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Thursday, June 22, 2023 2:31 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] WP24-06

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From: jerome.kristjanson <nrjkr@gcl.net>  
Sent: Thursday, June 22, 2023 8:48 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] WP24-06

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7/7/23, 11:21 AM

Mail - McKinney, Kaya T - Outlook

I am in opposition to WP24-06 as a property owner. Lot 14 Photograph Creek, there are many deer in my yard, when I have there is sign of deer/cab in abundance. The proposed restrictions do not benefit locals or those who have family in Juneau who have hunted in this area and know the resource is being unfairly (unproved) by outside interests.

Jerome A. Gotsjanson

PO Box 14

Palisade, AK 99830

Sent from my iPhone

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7.8723, 4.08 (PM)

Hull - McKinney, Kylene I - Outlook

Fw: [EXTERNAL] WP24-04, WP24-05, WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:24 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 2:01 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] WP24-04, WP24-05, WP24-06

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From: Greg Lockwood <greenhoochie@icloud.com>  
Sent: Tuesday, June 27, 2023 12:29 PM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] WP24-04, WP24-05, WP24-06

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172

7/9/23, 4:06 PM

Mail - McKinney, Kayla T - Outlook

Please accept this comment for subsistence proposals WP24-04, WP24-05, and WP24-06.

In review of the Federal subsistence EIS as well as ANILCA Title VII, I believe that the intent of these processes and documents is to focus on maintaining a healthy population of fish and wildlife for harvest while also allowing rural residents subsistence priority. Have there been any re-evaluations to the EIS since the 1992 RQO? It does not appear so on-line? Restrictions to hunting and fishing were predicted to only be needed when resources were below healthy numbers. Human populations have not increased since 1990 in most places in Southeast (SE) Alaska. Because of this, it is difficult to believe that the number of animals impacted has increased as much as was predicted by the EIS. In fact, in many locations in SE, including Pelican, human populations have declined. From what I understand, deer populations in Alaska game management Unit 4 are, according to Alaska Department of Fish and Game, healthier than all other units in the state. The EIS process ended with an alternative that met the purpose of giving subsistence hunting a priority while also claiming to limit the impacts to sport hunting. Shouldn't any regulations that are put into effect meet the same goals as the EIS? Additionally, I don't believe that anyone reviewing and commenting on the EIS, could predict implementation of regulations that impact sport hunting when there are healthy populations of resource animals. There would have been thick stacks of comments during the EIS if that was known.

It seems that it would be an easy exercise to partner with Alaska F&G to obtain information on the health of the deer herds, amount of impacts due to subsistence hunting compared to predictions in the EIS, and hunting pressure in the area.

Please do not make changes that affect the health and welfare of Alaskans until study work is complete to determine if deer populations are at risk. If they are not at risk, please do not make regulatory changes without a new EIS and an opportunity for the public to comment. Anything else would be mismanagement of an Alaska resource without proper authority.

Thanks,  
Sven Lockwood  
Greg Lockwood  
Juneau, Alaska residents and Sunnyside cabin owners

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7:5523, 4.02 PM

Mail - McKinney, Kyrle T - Outdoor

Fw: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:29 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Motuszkowitz**  
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theo\_motuszkowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Wednesday, June 28, 2023 11:05 AM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

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From: Bob MacKinnon <rbob@alaskaelectricllc.com>  
Sent: Tuesday, June 27, 2023 2:17 PM  
To: AK Subsistence, FW7 <subsistence@fw7.gov>  
Subject: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

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7/9/23, 4:02 PM

Mail - McKinney, Kayla T - Outlook

I am a lifelong Juneau resident and deer hunter. I find the proposals to close areas WP24-04, 05 and 06 unnecessary. I personally never hunt any of these areas but do worry about what it may mean for setting a precedence. If these areas can be closed for reasons that seem very subjective, (Too many people in certain beaches, No parking, Other hunters make deer skidish etc.) instead of more of a general concern for the deer population then everyone will have these concerns everywhere they go. I know the frustration of ever increasing populations of people in your hunting areas, however if we go down this road, there is no end to the grips that people will have trying to eliminate other people's opportunities. The deer populations seem very high, there should be no reason why anyone should not be able to obtain their allotted amount each year with a little effort, especially in these areas. Thank you for your consideration.

*Bob MacKinnon*

Alaska Electric

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Juneau, AK 99803

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7/17/23, 10:36 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Southeast deer proposals

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:28 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

*Theo Matuskowitz  
Supervisory Regulations Specialist  
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theo\_matuskowitz@fws.gov*

**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Tuesday, June 27, 2023 1:42 PM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] Southeast deer proposals

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**From:** Charlie Martelle <cmartelle@yahoo.com>  
**Sent:** Monday, June 26, 2023 8:37 AM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Southeast deer proposals

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7/7/23, 10:38 AM

Mail - McKinney, Kayla T - Outlook

I oppose the new proposals for angoon, hooded, and pelican areas. Southeast residents have just as much right to hunt these areas as the residents. As a Juneau sportsman I have to travel further and hunt and fish harder than the people in these communities. This also costs me more. Residents of these areas can fill their freezers with sustainable, organic meat and fish at a fraction of the cost and effort it takes me or other Juneau residents. We all have a right to the land, water, and the resource it provides. Though I don't hunt all of the areas mentioned I have friends and neighbors that do, and they rely on that meat. Also by implementing these rules you would be taking away from an experience and a lifestyle for many, opportunities for youth, and at least with the hooded road system an opportunity for hunting that is not vessel based. I understand that hooded residents believe that the Juneau hunters are the problem, but they also benefit from the added revenue brought in from during a time of year with economic decline.

I oppose WP24-04, WP24-05, and WP24-08

Charlie Martella

[Sent from Yahoo Mail for iPhone](#)

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1973-4-21 PMK

Wag - McKinney, Kayne | - Oulton

I am writing a letter of opposition to the proposals WP24-04, WP24-05, WP24-06 to close hunting to everyone except federally qualified subsistence users from November 1-15 in the areas listed. The reasons cited as obstruction for anchorage or no places to park along the road system are arbitrary. These are public access locations open on a first come basis. There is no reason that local residents cannot use these locations that are being claimed they are being denied access to. Living closer to these locations should actually mean local residents would be able to get to those prime locations first.. Accusations that Juneau hunters are reckless, poor shots, and a safety concern is unfounded and offensive. Living in Juneau does not mean that all residents do not follow a subsistence lifestyle or are irresponsible hunters. I am a hunter from Juneau who helps support my family's food source by hunting and fishing. I hunt in all areas near Juneau and as far as Freshwater Bay on Chichagof Island throughout the season. My family members and friends also hunt for the purpose of meat gathering and take every care to harvest efficiently and responsibly. Many of us have taken or taught hunter education courses, always go to the range before hunting season to check the accuracy of our rifles, wear orange in the field and do the best we can to communicate our location to other hunters or avoid places where we know hunters may be. Accessing these locations by boat can also be dangerous for longer travel and the desire to hunt during the listed time frame are also the same reasons cited by the Southeast Alaska Subsistence Regional Advisory Board. According to the letters submitted last year by ADF&G in response to similar proposals, members of these communities have actually reported a reduction in effort, however, maintain greater success in hunting, showing that there are plenty of deer for subsistence users to harvest with little effort. Deer populations in GMU 4 consistently have the highest deer pellet counts and other indices suggest the population is stable and sustainable. I hope the Federal Subsistence Board references the data submitted last year by ADF&G when deliberating these proposals. Thank you for your consideration.

Michelle Morris  
Juneau resident

7/17/23, 10:36 AM

Itas - McKinney, Kayla T - Outdoor

Fw: (EXTERNAL) proposed hunting closures

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:27 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Motuskawitz**  
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theo\_motuskawitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:44 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] proposed hunting closures

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From: Richard Morris <[akreeldeal@gmail.com](mailto:akreeldeal@gmail.com)>  
Sent: Monday, June 26, 2023 8:37 AM  
To: AK Subsistence, FW7 <[subsistence@fws.gov](mailto:subsistence@fws.gov)>  
Subject: [EXTERNAL] proposed hunting closures

<https://doi.org/10.1002/for> | <https://onlinelibrary.wiley.com/doi/10.1002/for>

<https://stock.office365.com/mailbox/3AAQKADp4N8E1/TUuW4NCE7NDAJY04M9H1ThY7AM2JBY7uYpAQALcVMECKd7G7BAgOx5F5bKV...> 1/2

7/7/23, 10:36 AM

Mail - McKinney, Kayla T - Outlook

I am writing to oppose the proposed hunting closures in Southeast Alaska.  
 WP24-04 (Southwest Admiralty)  
 WP24-05 (Hoonah Area / NECUA)  
 WP24-06 (Pelican Area / Islands Inlet)

There are several reasons that I oppose these closures. First and foremost is that the Alaska Dept. of Fish and game did a lengthy study and found that deer populations and hunter success has been improving throughout the area. Secondly, looking at some of the specific reasons that they want them closed are laughable. I am not sure that the locals don't miss any shots. I like to think that all hunters, whether from Juneau or one of the villages, try their best to shoot and kill the deer as accurately and humanely as possible. If the Juneau hunters were to anchor in less favorable areas would that make it better for them? I am not sure how the hunters make it a public safety concern in Hoonah, and similarly not sure how many Juneau residents take their cars over and take up all the parking along the miles of logging roads on Chichagof Island.

When it comes to the Hoonah area, I bought land and built a cabin specifically to hunt the area. This proposal would prevent me from doing the one thing I bought the property for. Are there going to be exemptions to allow property owners to still hunt in the area even if they are Juneau residents? I hate to say it, but really all this proposal is trying to accomplish is to reduce the amount of hunters so that the locals don't need to put as much effort into the hunt. It is well known that Hoonah's hunters like to run the roads and shoot deer. Angoon residents hunt deer year round. Interesting how there is very little harvest data from the residents and that there were very few deer tags requested from the local hunters.

I also don't care for the proposal to close the hunt for the first two weeks in November. This is obviously the rut, and most Juneau hunters are looking for big bucks at that time. Both sexes are open for hunting and does come running in more than bucks do. There is plenty of opportunity for everyone to harvest their trophy or meat deer.

On a final note, Juneau residents can not hunt in January. This is the easiest time of year for hunting deer. They are all down low and close to the beach or on the beach sitting high. This provides an easy opportunity for locals to harvest deer.

Thanks for your time hearing about why I oppose these propositions. Again, please refer back to the ADF&G report on Sitka Blacktail and base this off of science.

Cheers,  
 Billy Murray

<https://outlook.office365.com/mail/inboxid/AAQkAGtNGE1/TUxWJNDEhDAXY04M/h1.TkwyJ4M2JYTKwyGQAALcVMCKG%28AqQa56tpKV...> 2/2





7/17/03, 10:54 AM

Italy - McKinney, Kaye - Outside

My family has been hunting in these areas for three decades. I totally object to the reasoning for these new proposals, the arguments are simply not valid. When we are hunting in these areas we seldom see any other people. Most of the hunting traffic we see are those that are trolling the beaches looking for an easy deer to shoot from their boats. As a long time user of these areas I oppose these proposed regulations they are unwarranted.

Mike Nizich

<https://doi.org/10.1002/anie.201911001>



7/5/23, 3:40 PM

Mail - McKinney, Kayla T - Outlook

Please accept this email as my public comment in opposition to the federal Unit 4 deer proposals (WP24-04, WP24-05, WP24-06) to be considered at the Oct 2023 meeting. I understand that the proposal's authors wish to ensure significant and meaningful priority is afforded to all Federally Qualified Users (FQUs). However, FQUs already have significant and meaningful priority through their exclusive January season as well as the Federally Designated Hunter Program. I also disagree with the claim of the proposal's authors that non-federally qualified users are impeding or causing FQUs to have difficulties meeting their subsistence needs. In considering the Unit 4 deer proposals from 2022, the Federal Subsistence Board heard testimony to this effect and declined to pass these proposals. Finally, data from ADF&G does not show a decline in FQU success rates in any of the proposed areas.

Thanks,  
Nicholas Orr

<https://outlook.office365.com/mail/mailboxid/AAGkADg4NGE1TjUxLWJhNDk1NDQxY04MjhlTkwYjA4M2JhYTkwYgAQAPQzs9Bldpqu09FIEu0w%3D> 2/2

7/25/23, 4:23 PM

Mail - McKinney, Keyna T - Outdoor

Fw: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:26 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

Theo Motuszkowski  
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theo\_motuszkowski@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:49 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

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From: James Parkin <jwparkin4@gmail.com>  
Sent: Monday, June 26, 2023 12:49 PM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

This article has been accepted for inclusion in a future issue of this journal. Content is final as presented, with the exception of pagination.

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<https://stock.officelife.com/mall/index/AAQkA0gINDt1/TUuWwH0K!NOAsY04MjHnLTtwY14BMJFYtWYqAQAD7hLwWHBNEmoL50caE> ... 1/2

7/8/23, 4:23 PM

Mail - McKinney, Kayla T - Outlook

I oppose these proposals (WP24-04, WP24-05, and WP24-06) because they would negatively affect Families and they are not necessary because other conservation methods would be more beneficial. There are many family members of rural communities that have moved to Laramie for work, but return home to visit and hunt. These are precious reunions which would be reduced if these proposals passed.

Targeting bucks is a good conservation method and the rut is the best time to do that. Often however, rural residents will target does because they have more fat during the rut. This is true, but perhaps education could be provided to rural communities as to the negative affect on overall deer numbers caused by targeting does. I am not suggesting closing or reducing doe hunting. That won't work! Knowledge and changing individual minds is the best chance for lasting change.

Thank you for your time

Sent from my iPhone

<https://outlook.office365.com/mail/inboxid/AAGkADg4NGE1/TULWJND8PNDAXY04M/hu1kwyY44M2JYTYkwyYgAQAD7nUvR8BNEmdSL5GnsME> ... 2/2

7/23, 3:47 PM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Attn Theo Matuskowitz

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:19 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

*Theo Matuskowitz*  
*Supervisory Regulations Specialist*  
*US Fish and Wildlife Service*  
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*theo\_matuskowitz@fws.gov*

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**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Thursday, June 29, 2023 1:19 PM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] Attn Theo Matuskowitz

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---

**From:** Ben Pinney <benpinney@gmail.com>  
**Sent:** Thursday, June 29, 2023 10:56 AM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Subject:** [EXTERNAL] Attn Theo Matuskowitz

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7/23, 3:47 PM

Mail - McKinney, Kayla T - Outlook

WP24-04

WP24-05

WP24-06

My name is Ben Pinney and I am the Southeast director for the Alaska Bowhunters Association. While I speak only for myself and not directly for the ABA as this is not specifically bowhunting related, I do know quite a few hunters in Juneau. And Bowhunters throughout southeast and I have not heard one single instance that supports the reasons stated for these proposals.

I object to all above proposals as they are simply subjective statements not based on true data. NO hunting opportunities should be closed down without basing the decision on objective facts.

Rebuttal to specific reason #1) Juneau residents may miss deer. Do we have any data on what that percentage that actually is? Also, do we know that it is any more significant than "local hunters" one could just as easily claim that local hunters miss deer more and this makes the hunting more difficult for non locals.

Rebuttal to #2) Juneau Hunter anchor in all the best anchorages (this restricting access, where are all the best anchorages? How many "best" anchorages are there? What percent of the time has this actually occurred? 1 day out of the year or 20? There's a lot of missing facts on this one.

Rebuttal to #3 Juneau hunters are causing a public safety concern in Hoonah. Let's see the numbers clearly there must be documented public safety incidents that have happened. How many more incidents are due to Juneau hunters vs local hunters? Again, let's see the facts.

Rebuttal to #4, Hoonah residents can't find a place to park due to so many Juneau residents. Once again, how many parking spots are there along the many miles of Hoonah roads? How many are truly taken up by Juneau residents. How is this hunter able to differentiate a Juneau car from a non local car every single time a vehicle is parked in the exact same spot that said person wants to park in?

There is a clear lack of data here and if we look at the most recent formation put out by fish and game regarding this subject it is low local Hunter recruitment that is causing a lack of deer taken by locals vs non locals. The deer numbers are not being harmed by Juneau hunters. Fish and game has this data and I hope you will be making informed, clear fact based decisions.

Please Vote no to all proposals WP24-4,5 and 6

Until there is clear objective data that is significant.

Thank you for your consideration.

Ben Pinney

Sent from my iPhone

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7:003, 3:50 PM

Majid - Makhadmeh, Korynne I - Durrant

Fw: [EXTERNAL] proposed hunting closures

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:20 PM

Re:McKinney, Kayla T. <kayla\_mckinney@fas.gov>

1 attachment (1.3 KB)

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theo.matulisowitz@fws.gov

From: Shawings, Bernard <bernard\_shawings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Wednesday, June 28, 2023 11:59 AM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] proposed hunting closures

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From: Alex Reid <areid@lynden.com>  
Sent: Wednesday, June 28, 2023 10:56 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] proposed hunting closures

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<https://outlook.office365.com/mail/mailboxid/AAQADpANJH1TTLW-WUJNDPNDQpYDMSHThwYJMSDUTYtswYpAQAfUd3uP/2RUj7WAgC08d4J...> 1/2

7/8/23, 3:55 PM

Mail - McIntyre, Kayle T - Outlook

I oppose these proposals WP34-04, WP34-05, and WP34-06 because they are not necessary and are completely one-sided. This is the equivalent of me trying to shut down Costco to all the rural communities because they take up too much parking or buy the groceries I want. All hinder deserve the same rights.



<https://outlook.officeapps.com/rel/mailboxid/AAC8ADg8NGP1ZTUdWUJNDPNDAXYDAMPHNThvYJA8DJIYThvYpAQURdOnJN2R5Ug7h2AgCCqpbU...> 2/2



1/1/23, 10:53 AM

Mail - McKinney, Kayla T - Outlook

I oppose these proposals (WP24-04, WP24-05, and WP24-06) because they are not necessary.

Thank you

Catherine Sullivan

<http://outlook.officeapps.com/mail/psocold/AAGkAGg4RGZ1T/TLUWJ/NDG1NDQxYDQ4MjhlTlRyYjA4M2JYTTlRyYgAQAVCOHm%20ISseWFPbZOTRyp...> 2/2

7/1/23, 11:20 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:32 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

Theo Matuskowitz  
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theo\_matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Thursday, June 22, 2023 2:35 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

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From: Joel Teune <joel\_teune@hotmail.com>  
Sent: Thursday, June 22, 2023 10:10 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

This email has been reviewed for compliance with 50 CFR 17.11(a)(2) and 17.11(a)(3) and found to be in compliance.

Theo,

<https://outlook.office365.com/mailboxid/AAQ6A0g4N8E1/TUWVW4NDENDAUYO4MjYhThwYMMZURyThwYgAGAMVZ3B8PNDQABE1Y%3D> 1/2

7/1/73, 11:00 AM

Ital - Michigan Kings I - Cullson

Thank you for taking these comments. My comments are in regard to WP24-04,05,06.

I would like to start off by saying that I have not, nor do I intend to, hunt these areas; but I have faced similar Federal Subsistence changes for deer in Unit 2 near where I live. My stance then is the same now.

I do not support the proposed changes. I believe Alaska - rural or nonrural - is a tough place to live and has higher costs of living than the rest of continental U.S. Many Alaskans, like myself, do a fair bit of hunting and fishing for a number of reasons including recreation, high quality food, and to offset the higher costs of food at grocery stores. Since we are all privileged to live in a mostly free country, if I determine that my financial situation is not sustainable, I can relocate to a different area to improve my economic standing (higher paying job, lower cost of living, etc.). What I do not get to do is advocate limiting the rights of others using the words "subsistence" and "rural". In our day and age of "Amazon super saver shipping", I don't see the logic as valid. As a resident of the State of Alaska, I expect maximum access to opportunities to harvest game in ANY area of the State in which I reside. The best part about this, is everyone in the State gets equal access. If someone from Barrow wants to venture down to Unit 1A and hunt deer, excellent. If I want to venture to the interior and harvest Dall Sheep, excellent. Everyone has equal access - which means equal seasons, bag limits, etc.

I find it very undemocratic that the only say I get on these proposed changes (that affect a large number of people) is an email comment. I don't get to vote; I don't get any more than a comment:

Thanks for your time.

Joel Tenenre

1/5/73, 4:39 PM

Hall - McKinney, Wayne I - Oshkosh

Fw: [EXTERNAL] Comments: WP23-04; WP24-05; WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:25 PM

To McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Motuszkowitz**  
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theo\_motuszkowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:56 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

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From: Walker, Jesse <JWalker@tncour.com>  
Sent: Tuesday, June 27, 2023 7:01 AM  
To: AK Subsistence, FW7 <subsistence@fw7.gov>  
Subject: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

This work has been funded by grants from the National Science Foundation (NSF) Grant Number IRI-0726987.

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7/5/23, 4:09 PM

Mail - McKinney, Kayla T - Outlook

I am a living Juneau resident and deer hunter. I mainly hunt in Tanakee Unit and on Admiralty Island. I am writing to express opposition to proposal WP24-04, WP24-05, and WP24-06. These proposals are highly similar to proposals that have been submitted and have failed in recent years. I would urge the ADM to reject these proposals on the same grounds that the previous proposals failed. They are wholly unnecessary. Thank you for considering my comments.

**Jesse Walker,**  
Juneau Alaska

<https://outlook.office365.com/mail/inboxid/AAGkADg4NGE1/TUxLWjNDk1NDQxYD4MjhlTkwYjA4M2JhYTkwYgAQIAQae5U1kr5254p2V1U64FQs...> 2/2

7/27/23, 2:53 PM

Maal - McKinney, Kyrle T - Oubser

Fw: [EXTERNAL] Public Comment on WP24-04 and WP24-05

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

THU 7/6/2023 12:20 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

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theo\_motuskawitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Wednesday, June 28, 2023 12:02 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Public Comment on WP24-04 and WP24-05

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From: Chris Lunsford <clunsford1@gmail.com>  
Sent: Wednesday, June 28, 2023 11:37 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Public Comment on WP24-04 and WP24-05

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7/8/23, 2:53 PM

Mail - McKinney, Kayla T - Outlook

Re: Public Comment on Proposals WP 24-04, WP24-05

I am writing in opposition to Proposals WP24-04 and WP24-05 regarding deer hunting closures in the Hoonah and Southwest Admiralty areas. I am an Alaskan who lives in Juneau but am not currently qualified for federal subsistence. I respect the intent of the federal subsistence programs in Alaska but feel these proposals are not necessary. The deer populations in these regions are successfully managed by the Alaska Department of Fish and Game and are currently considered healthy. Further, both of these proposals make unfounded claims regarding Juneau and non-federally qualified hunters without supporting scientific evidence or data.

Please respect that the State of Alaska has management authority for wildlife resources in Alaska and that all Alaskans deserve access to these resources if there is not a valid subsistence hardship. Reject Proposals WP24-04 and WP24-05.

**Chris Lunsford**

<https://outlook.office365.com/mail/inboxid/AAGkADg4NGE1L7UxLWjNDk1NDQxYDQ4MjhlTkwYjA4M2JhYTkwYgQAHAj5d4cc3KZJgllqs0qubdpg%3D> 2/2

7/17/23, 11:19 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Attention: Federal Subsistence Board Office of Subsistence Management (Attn: Theo Matuskowitz) 1011 E. Tudor Road, MS-121 Anchorage, Alaska 99503-6199 Email: subsistence@fws.gov Fax: (907) 786-3898

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:33 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

Theo Matuskowitz  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, AK 99503-6199  
Office: (907) 786-3862  
Telework: (907) 786-3888  
FAX: (907) 786-3898  
theo\_matuskowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>

Sent: Friday, June 23, 2023 8:12 AM

To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Subject: Fw: [EXTERNAL] Attention: Federal Subsistence Board Office of Subsistence Management (Attn: Theo Matuskowitz) 1011 E. Tudor Road, MS-121 Anchorage, Alaska 99503-6199 Email: subsistence@fws.gov Fax: (907) 786-3898

Office of Subsistence Management  
U.S. Fish and Wildlife Service - R7  
1011 E Tudor Rd, MS 121  
Anchorage, AK 99503-6199

(907) 786-3888 phone  
(907) 786-3898 fax

Website: <https://www.doi.gov/subsistence>  
Like us on Facebook! [www.facebook.com/subsistencealaska](http://www.facebook.com/subsistencealaska)

From: Chris Carson <bornalaska@yahoo.com>

Sent: Thursday, June 22, 2023 11:21 PM

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

Subject: [EXTERNAL] Attention: Federal Subsistence Board Office of Subsistence Management (Attn: Theo Matuskowitz) 1011 E. Tudor Road, MS-121 Anchorage, Alaska 99503-6199 Email: subsistence@fws.gov Fax: (907) 786-3898

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7/7/23, 11:19 AM

Mail - McKinney, Kayla T - Outlook

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Regarding: WP24-06 SE Deer 4 Pelican area - close to non-federally qualified users Nov. 1-15 19, to close a portion of Chichagof Island around Pelican from Nov 1-15.

I was born in Juneau in 1965. I lived in Pelican for a few years in the last 60's and currently have family still living full time in Pelican and many more living in Juneau. We have a family cabin up Lisianski Inlet from Pelican where my family spend a lot of time fishing and hunting during the summer and late into the fall.

Hunting is especially something that family members take part in as they rely very much on putting venison away for the winter. Just because you live in a larger community, doesn't mean you don't have the need for these resources. My son has three young children and with the cost of EVERYTHING, hunting is extremely important.

Now AGAIN, some local thinks the few locals who ACTUALLY hunt in Pelican, should get exclusive access to deer during the rut. Over the past four years we have witnessed less then a half dozen boats travel past our cabin to hunt during this time period.

This has nothing to do with the deer population, as it is very healthy in Lisianski Inlet. My family are very avid hunters and have hunted the ABC islands over the past 50 years and are well aware of deer populations. This simply has to do with some locals (very few) desire to hunt strictly from their boat without others scaring deer back up into the woods.

With the aging population in Pelican, approval of this proposal would limit the ability of out of town family members to successfully assist elder family living in Pelican. Hunting during the rut increases anyones chance of calling in a deer for a successful hunt. Limiting any particular American citizen from hunting on public land (fed\state) should be found unconstitutional and never allowed.

People living in Pelican are already allowed to hunt through January, if they can't shoot their 6 deer in six months, then they are not trying hard enough.

I strongly recommend this proposal be DENIED.

Thank you,

Chris L. CARSON

<https://outlook.office365.com/mail/inboxid/AAQkADg4NGE1ZTUxLWJNDENDAxY04MjhlTkwyY4M2JjYTYwYgAQACQ3HWhJUUwdGhLSNTkdFvi...> 2/2

June 15, 2023

Normi Carson  
PO Box 98  
Pelican, AK 99832

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

RE: Proposal 24-B

I am adamantly opposed to this proposal. I first came to Pelican in 1966 as a college kid working at the cold storage. In the fall of 1968 I was hired by the Alaska State Troopers. Obviously, I had to depart Pelican for work reasons, but between 1966 and 2022 I deer hunted every year in the areas around Pelican described in this proposal. In the mid-80's my wife and I acquired a 3 acre parcel along Lisianski Inlet not far from Pelican. Later we would inherit my parents home in Pelican, and then later purchase another home in Pelican.

We have two sons, one recently retired from the Alaska State Troopers and another with about 7 years to go to retirement from the same agency. Both boys hunted with myself and my parents for deer in this proposal area. The oldest son resides in Juneau and has hunted out here for many years; under this proposal he would be excluded. Our younger son is about to transfer to Bethel and would also be excluded. The time frame within this proposal mirrors the time of the fall the boys joined us for a family tradition of deer hunting and a time to be together. Mid-November is also the time the Alaska Marine Highway System traditionally schedules a ferry from Juneau to Pelican.

Back in 2021 the State Board voted down a similar proposal; has anything changed to warrant a reversal? I say no; we have more deer and the # of hunters has not increased. We have a home along Lisianski Inlet and I can say we have not seen any increase in hunting pressure since 2021; we

have seen a continued healthy number of deer. I will also point out that since the 2021 proposal was voted down there has not been a local referendum on this matter. Why have the local hunters not been asked for an opinion before this proposal was brought up again?

As it stands now, the State regulations provide a substantial restriction on non-resident hunters. A non-resident is required to purchase a \$160 hunting license and buy a deer tag for each deer harvested at \$300. Add to the license/tag expense a one way airplane ticket from Juneau costs \$287.00. The presenter offered several subjective reasons for this proposal, here are a few:

- **This proposal is to establish a meaningful preference for the continuation of subsistence uses of deer. Pelican residents depend on deer and are experiencing difficulty meeting their subsistence needs— --**
  - *Their was no offering of data to support this. How many local hunters are there?*
  - *How many hunters were not harvesting deer?*
  - *How many deer does it take to meet their subsistence needs? Between August 1 and January 31st local hunters could not harvest enough deer to feed their family! Is there data to support this?*
  - *Pelican just saw the opening of a general store by year round residents; The owner is submitting the paperwork necessary to accept SNAP payment for persons of low income.*
- **Non-Federally-qualified anchor boats in small bays which inhibits access to traditional hunting areas by subsistence users.**
  - *After over 50 years of hunting in the proposal area I can not recall any boats anchored overnight in the bays. Is the presenter suggesting the boat is there for an extended number of days? I have never seen this. Is there a log book or photos to substantiate this statement? Actually I can not think of many places in the proposal area I would want to anchor over night in November.*
- **Non-Federally-qualified users may also decrease the success of subsistence users if they shoot deer and miss causing the deer to be more skittish and wary.**
  - *What may happen is not a valid reason to deny other Alaska*

(2)



residents of their right to hunt. Actually, I did find a 2 point buck about 5 years ago, dead and floating in the inlet. As it turned out, a local Pelican resident messed up and did not adequately check on the deer he shot on the beach. At that time I posted a photo of this on a community bulletin board.

- **High fuel costs, depressed economy, small boats and incimate weather also affect the ability of Pelican residents to meet their subsistence needs. They cannot afford to have many unsuccessful hunts or to travel far from their community to hunt deer because of these safety and economic concerns.**

—High fuel costs are the same for everyone whether from Juneau or Pelican. For years I hunted all of this area out of a 14' Lund; very economical with a small outboard. Us Pelican residents have the upper hand when it comes to weather; we can hunt the good days while others are still trying to get to Pelican. Weather deters Juneau based hunters from traveling to Pelican.

—“Travel far from their community”, this proposal encompasses an inlet 22 miles long and straits about another 11 miles long. Why advocate closing such a large area if the local hunters can not afford to travel very far?

—Depressed economy, there are jobs going unfilled by locals! Homes with multiple family members receive multiple PFD's. I do not characterize Pelican as a community on the edge of a food shortage.

—Safety concerns? What are they?

- **Non-Federally-qualified users exacerbate these concerns by obstructing access, competing for deer, and potentially altering deer behavior all of which decreases chances of successful subsistence hunts and hinder the continuation of subsistence uses.**

—All of this is generalized opinion. There is no data to substantiate the obstructing of access, or competing for deer; what are the ADF&G stats on this? How many Juneau residents hunted this area? “Potentially” is not justification. There is no demonstration of the hindering the continuation of subsistence uses; us locals can hunt until the end of January.

- **Subsistence hunting focuses on efficiency. The proposed two week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons:**

—First. The deer are still fat providing the highest quality and amount of meat.

- Second. The deer are in the rut making them more vulnerable to harvest.
- Third. Weather conditions are favorable for proper meat care and processing.
- None of these points are justifiable reasons to exclude Alaska residents. ANILCA requires a conservation issue, not whether the species is fat, in the rut, or if the weather conditions are favorable for taking care of the meat.
- \* **Deer are primarily pushed to beaches by heavy snowfalls which usually occur after the requested closure period in early November. Additionally, much of the proposed closure area is extremely steep and does not contain many beaches. Lastly, when deer are on the beaches they are usually feeding above the mean high tide line, which is under Federal jurisdiction.**
  - The area in this proposal actually contains approximately 75 miles of shoreline. There are approximately 50 beaches and small coves that invite hunting access. I have harvested numerous deer on the beach under legal means to do so.
  - Behind State subdivided lots there is a substantial number of acres of State land. This proposal will encourage non-federally qualified subsistence hunters to access those acres; so along with beach hunting there will be more "skittish deer".

For such a serious matter as denying Juneau based hunters access to hunting in two weeks of November, this proposal is based upon opinion and hyperbole. I urge the council **not** to pass this proposal; leave State regulations for the sport season and Federal for the extended subsistence season.

Norm Carson  
907-321-1950  
lcarson@alt.net

(4)

Proposal 24-6 Public Comment

May 5, 2023

As a lifelong Alaskan, I appreciate the efforts made in Proposal 24-6 to establish a meaningful preference for the continuation of subsistence uses of deer. However, it is essential to ensure that any decisions regarding hunting regulations are based on sound scientific data and the advice of wildlife biologists with expertise in the area.

It is essential to maintain the sustainability of the deer population, and any restrictions on hunting should be based on accurate and reliable information to achieve the best outcome for all stakeholders, including subsistence users and non-Federally qualified users.

Therefore, I urge the Federal Subsistence Board to conduct a thorough and objective analysis of the available data on deer populations and consult with wildlife biologists before making any final decisions on the proposed regulation. This will help ensure that the interests of all stakeholders are taken into account and that the regulation is effective and sustainable in the long term.

There has yet to be a measurable impact on deer populations in the Pelican area from non-federally qualified hunters. Additionally, many of the non-Federally qualified hunters who hunt in the area surrounding Pelican are either previous Pelican residents or family members returning to Pelican to hunt with family who still reside in Pelican, as in my case.

It is worth noting that the deer populations in Unit 4 are reported to be healthy and sustainable. Therefore, any restrictions on hunting should be based on sound scientific data and the advice of wildlife biologists, ensuring that the regulation is tailored to the actual needs of the wildlife and the people who depend on it.

In conclusion, I recommend that the Federal Subsistence Board consider a balanced approach to regulating deer hunting in the proposed closure by not making any changes to the current deer hunting regulations. This will help ensure the sustainability of the deer population and maintain equitable access to this valuable resource for all users.



Scott Carson

June 15, 2023

Steve Christensen  
509-643-8488  
Email: [FinnFinn2018@gmail.com](mailto:FinnFinn2018@gmail.com)

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

RE: WP24-6  
Lisianski Deer Restriction

I moved to Alaska in 1985 and resided in Juneau for almost 30 years. I moved to the Lower 48 for personal reasons. Five years ago I returned to Alaska and purchased a home in Pelican. I am presently employed in Pelican helping remodel a private home.

I have always been an avid hunter and fisherman; I was involved in subsistence hunting and fishing. I hunted to put food on my table in my first 30 years in Alaska.

A recent study by the Department of Fish & Game states the deer population in the area of Lisianski Inlet & Strait is not at all threatened. In years past I have experienced regulation changes by the ADF&G when they felt it necessary to protect the deer population; this is not the current situation.

WP24-6 would restrict deer hunting in the Lisianski area between November 1 and 15 to only those residents meeting the qualifications for a Rural Qualified Hunter. Only the residents of two communities in Southeast do not meet the rural standard; those would be of Juneau and Ketchikan.

In the past 5 years I have seen plenty of deer along the shores of Lisianski Inlet. All experienced hunters in Southeast understand that weather conditions and individual effort determine success or failure.

By current statistics, the deer population is flourishing and subsistence hunters are more successful now than in previous years.

I ask that WP24-6 not be passed.

Sincerely,

Steve Christensen  
General Delivery  
Block 1, Lot 7  
Pelican AK 98832

7/7/23, 11:38 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] regarding WP24-06 SE Deer & Pelican area

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:34 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

*Theo Matuskowitz*  
*Supervisory Regulations Specialist*  
*US Fish and Wildlife Service*  
*Office of Subsistence Management*  
*1011 East Tudor Road, MS 121*  
*Anchorage, AK 99503-6199*  
*Office: (907) 786-3882*  
*Telework: (907) 786-3888*  
*FAX (907) 786-3898*  
*theo\_matuskowitz@fws.gov*

---

**From:** Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
**Sent:** Wednesday, June 21, 2023 10:40 AM  
**To:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
**Subject:** Fw: [EXTERNAL] regarding WP24-06 SE Deer & Pelican area

Office of Subsistence Management  
 U.S. Fish and Wildlife Service - R7  
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 Anchorage, AK 99503-6199

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**From:** Sanders, Andrew - FS, AK <Andrew.Sanders@usda.gov>  
**Sent:** Tuesday, June 20, 2023 10:46 AM  
**To:** AK Subsistence, FW7 <subsistence@fws.gov>  
**Cc:** Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; Cross, Robert - FS, AK <robert.cross@usda.gov>  
**Subject:** RE: [EXTERNAL] regarding WP24-06 SE Deer & Pelican area

*\*\*\*\*\* Forwarding the Subsistence Management Board Meeting Minutes \*\*\*\*\**  
*\*\*\*\*\* Forwarding \*\*\*\*\**

*From: "Andrew Sanders" <Andrew.Sanders@usda.gov> [mailto:Andrew.Sanders@usda.gov]  
 Sent: Tuesday, June 20, 2023 10:46 AM  
 To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; Cross, Robert - FS, AK <robert.cross@usda.gov>  
 Subject: RE: [EXTERNAL] regarding WP24-06 SE Deer & Pelican area*

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7/7/23, 11:38 AM

Mail - McKinney, Kayla T - Outlook

Good morning Andrew, I'm forwarding this email to you. I contacted Brian Ubelaker here in Anchorage and he said that you would be able to get this where it needs to go.

Thank you,  
Bernard Shavings

Office of Subsistence Management  
U.S. Fish and Wildlife Service - R7  
1011 E Tudor Rd, MS 121  
Anchorage, AK 99503-6199

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From: denny corbin <[dennycorbin\\_dc@gmail.com](mailto:dennycorbin_dc@gmail.com)>  
Sent: Friday, June 16, 2023 7:44 PM  
To: AK Subsistence, FW7 <[subsistence@fw7.gov](mailto:subsistence@fw7.gov)>  
Subject: [EXTERNAL] regarding WP24-06 SE Deer & Pelican area

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PO Box 1001, Federal Subsistence Board  
Office of Subsistence Management  
(Attn: Theo Matkowskyz)  
1011 E. Tudor Road, MS-122  
Anchorage, Alaska 99503-1100  
[Email: subsistence@fws.gov](mailto:subsistence@fws.gov)  
(Tel: (907) 745-3494)

Heighting WP2806 SE over a minor area : close to north-south constant :  
 using New 1, 19, 18, 15, 12, 10, 8, 6, 4, 2, 1, 0, 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827

Improving my application is a dual hunting lion that is not about your hunting.

[illegible]

And then I remember... how many of those just did find it necessary to wear hijab when they graduate high school (assuming they ever used that word)? (There aren't really any legitimate opportunities to work on the operations or technical programs... just some Persian food storage closed many years ago. The town had almost no a fraction of the size it was when I was a kid and barely anyone alive by previous ethnic generations.)

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7/7/23, 11:36 AM

Mail - McKinney, Kayla T - Outlook

In the good old days we would bring loads of fat king salmon, halibut and black cod in to fill the freezers and ship out on the barge. There was lots of money to be made then. There were other young people around too and fun to be had... not so much now.

It struck me as sad, that these kids might hunt with their family and friends growing up here, but then find it necessary to go to a larger town to find work, or a life... and that they then would be shut out from deer hunting in the traditional place that they had hunted growing up.

That those kids would upon leaving suddenly become second class citizens in a place they regard as home; because they needed to find a way to make a living; because they found they had to leave to find opportunity, because a small town in Bush Alaska just won't offer enough so that a person can support a family, buy property or save for retirement.

These kids that have to leave... If they have kids, and their parents still lived in the village, they wouldn't be able to bring their kids home to hunt with the grandparents. If they did that it would be a federal crime. So there is no way to pass down the tradition.

The federal subsistence laws perfectly break the bond of culture and traditions around subsistence living that rural Alaskans cherish. The feds are good at doing that it seems - destroying communities and cultures.

This proposed law is not about the need of local people to get some time to catch deer. They are already here year round, all that they have is time.

I will resist the urge to go into further details regarding what I think is really going on. Suffice to say, this is a bad idea that will destroy something I thought was important.

Best Regards,

Gerry Corbin  
Sunnyside, Alaska

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7/8/23, 3:10 PM

Mail - McKinney, Kayla T - Outlook

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

Dear Federal Subsistence Board,

I am writing this letter in strong opposition to WP24-06.

I am an Alaskan resident who has hunted in Southeast Alaska for 27 years. I currently reside in Juneau but for many years, I lived a subsistence lifestyle on Baranof Island. Over the last 15 years, I have hunted Lisianski Inlet and the surrounding areas with my friend, who is a property owner in Lisianski Inlet. Our hunting trips usually take place in November, when our work schedules allow us a short amount of free time from our jobs. As I am now a non-federally qualified user (NFQU), WP24-06 would unfairly restrict me from hunting in Lisianski Inlet, Lisianski Strait, and Sang Bay during a part of the year when I have time to hunt.

This proposal is misguided, misinformed and would unfairly exclude Alaskan residents from hunting a healthy and sustainable population of deer.

According to ADFG statistics:

1) Since 2013, the average number of deer harvested per year by federally qualified users (FQU) in the Lisianski area increased and the number of days required for FQU to harvest a deer decreased, i.e., efficiency increased.

2) The number of NFQU hunting in the Lisianski area and the number of deer harvested per year by NFQU has been stable since 1987. The number of hunting days by NFQU has decreased.

3) The deer population in GMU 4 is higher than anywhere else in the state. Multiple ADFG deer abundance indices (pellet survey, alpine counts, and winterkill beach mortality transects) all indicate that the deer population in Game Management Unit 4 is high and stable.

FQU hunters are harvesting more deer per hunter and are more efficient than in previous years; the number of NFQU hunters is not increasing; and there is not a deer conservation concern in the proposed area.

I strongly encourage the Federal Subsistence Board to do its due diligence and look at the facts and reject WP24-06. Without careful review of the best available data, making any decisions would be inappropriate and reactionary. If the proposal were approved, it would unnecessarily and unfairly restrict hunting opportunities for Alaskan residents who cherish the opportunity to hunt and rely on its sustaining results.

Thank you for your consideration.

Pat/c/ Malecha

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7/7/23, 10:54 AM

Mail - McKinney, Kayla T - Outlook

I am writing to express my opposition to Proposal 24-6 which is proposing deer hunting closures in Lisianski Inlet and surrounding areas. Proposal 24-6 is misguided because the deer population in and around Lisianski Inlet is abundant.

I am an Alaskan who has lived here for over 20 years and owns a home in Pelican. However, I am currently living in Juneau and do not qualify for federal subsistence. As an Alaskan, I have a deep appreciation for subsistence rights and the need for food security. The ability to harvest fish and game in the area surrounding Pelican is especially important to me as I intend to make my Pelican my primary residence in 10 years.

I can personally attest to the high abundance of deer in and around Lisianski Inlet from annual observations and my harvest success since 2008. The Alaska Department of Fish and Game (ADF&G) summarized 25 years of point data that support a robust deer population along with declining hunter pressure. Please recognize and give substantial weight to this robust and independent data and not restrict opportunities of non-subsistence qualified hunters. ADF&G also reports that hunter success in this region is higher than anywhere else in the State. Proposal 24-6 does not qualify as a subsistence hardship. Please reject this proposal.

Sincerely,

<https://outlook.office365.com/mail/inboxid/AAGkAQg4NGE1/TUJLWjNDkxNDY0MjhlTkwYjA4M2JlYTYwYgAQAg5F3x%2F-dsp%28WH7...> 2/2

7/17/23, 11:00 AM

Atari - McKinney, Kayla F - Quilborn

Fw: [EXTERNAL] Comments from Mini Reink, Pelican Resident

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:30 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Motuszkowski**  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudar Road, MS 121  
Anchorage, AK 99503-6199  
Office: (907) 786-3867  
Telework: (907) 786-3888  
FAX: (907) 786-3898  
theo.motuszkowski@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:26 PM  
To: Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] Comments from Mini Reink, Pelican Resident

Office of Subsistence Management  
U.S. Fish and Wildlife Service - R7  
1011 E Tudor Rd, MS 121  
Anchorage, AK 99503-6199

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Website: <https://www.dol.gov/subsistence>  
Like us on Facebook! [www.facebook.com/subsistencealaska](http://www.facebook.com/subsistencealaska)

From: Norm Carson <nrcarson@atl.net>  
Sent: Saturday, June 24, 2023 2:13 PM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Subject: [EXTERNAL] Comments from Mini Reink, Pelican Resident

This work has been funded by the National Science Foundation (NSF) Grant #1055174, titled "Exploring the Role of Social Networks in the Development of Mathematical Proficiency in Middle School Students".

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7/7/23, 11:06 AM

Mail - McKinney, Kayla T - Outlook

1011 W. Yelder Road, NPS (2)  
 Anchorage, Alaska 99503-6199

Re: Proposal 24-B

Dear Board Members:

I believe the right to hunt for Alaskans has always been honorably all the families around our area and should be left as is. We don't need to get into something that is already working. Don't mess this up for all the local families that have hunted with their families and let us honor and respect what we do without complicating it.

Thank you...

Mini KONG  
 PO Box 106  
 Pelican, AK 99832

907-735-2311  
 907-961-2560

<https://outlook.office365.com/mail/inboxid/AAGkADg4NGE1/TUMWJND8PNDAXYD4M/hslTkwYJ46M2JYTKwYgAQAGxCuPDtsGpDn728WpTSe%...> 2/2



1/25/23, 4:28 PM

Maib - McKinney, Kayla T - Outlook

Fw: (EXTERNAL) WP24-06

Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>

Thu 7/6/2023 12:27 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>

**Theo Motuszkowitz**  
Supervisory Regulations Specialist  
US Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudar Road, MS 121  
Anchorage, AK 99503-6199  
Office: (907) 786-3867  
Telework: (907) 786-3888  
FAX: (907) 786-3898  
theo.motuszkowitz@fws.gov

From: Shavings, Bernard <bernard\_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>  
Sent: Tuesday, June 27, 2023 1:46 PM  
To: Matuskowitz, Theri TM <theri\_matuskowitz@fws.gov>  
Subject: Fw: [EXTERNAL] WP24-06

Office of Subsistence Management  
U.S. Fish and Wildlife Service - R7  
1011 E Tudor Rd, MS 121  
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(907) 786-3888 phone  
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Website: <https://www.dol.gov/subsistence>  
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From: Mary Robidoux <maryrobldoux333@gmail.com>  
Sent: Monday, June 26, 2023 9:03 AM  
To: AK Subsistence, FW7 <subsistence@fws.gov>  
Cc: Clay Robidoux <robidoux@gmail.com>; Mary Robidoux <marymbidoux333@gmail.com>  
Subject: [EXTERNAL] WP24-06

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7/8/23, 4:28 PM

Mail - McKinney, Kayla T - Outlook

Hello Mr. Matuskewitz - I am objecting to closing the above area to Juneau Hunters from Nov 1 - Nov 15. My family has hunted there for generations at our family's cabin. There has always and will continue to be an abundance of deer in that Pelican area. Some years, it is true that there were fewer deer present which was usually because of winterkill or an abundance of bears in the area. Those two factors alone could make for a scarcity of the deer population; not because of Juneau hunters. The reasons cited in closing the area to Juneau hunters are really ridiculous. If Juneau hunters miss their shots, maybe, they need to do more practice at a rifle range. Every one misses their intended target occasionally. Juneau hunters obstruct access by anchoring in all the best anchorages? Wouldn't it be better to be a good neighbor? I'm pretty sure that these Juneau hunters spend a few dollars in the towns which would then go away. Public safety concerns? Do these places not have a police department or a VPSO? Hoonah residents can't find a place to park to go hunting? Do those parking spaces charge a fee? There is always an economic fact to consider.

As you can see from my writing above, my family and I totally object to the present proposals to close areas around Pelican/Hoonah and Southwest Admiralty.

Thanks for your consideration.

Sincerely,

Dwight Kobidias

[br2@sci.net](mailto:br2@sci.net)

907-209-6017

<https://outlook.office365.com/mail/inbox/dAAQkAQgTNGE1/TUxLWjNDkxNDQxYDQ4MjhlTkwYjA4MzJhYTkwAQAEIPYN0%20mini.pgY8Oc9Qu...> 2/2



June 30, 2023

Electronic Submission via [subsistence@fws.gov](mailto:subsistence@fws.gov)

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

**Re: Safari Club International Comments on Wildlife Proposal 24-06**

Dear Federal Subsistence Board:

Safari Club International ("SCI") submits this comment in strong opposition to Wildlife Proposal 24-06 ("WP24-06"), which would close federal public lands within the the Lisianski Inlet and Lisianski Strait area ("Lisianski Area") in Game Management Unit 4 ("GMU 4") to Sitka black-tailed deer hunting for non-federally qualified users ("NFQUs") from November 1 to November 15. In February 2023, the Federal Subsistence Board ("FSB") rejected a related proposal, which sought to reduce the bag limit for NFQUs from six deer to four deer within the Lisianski Area ("WP22-10"). WP24-06 has no more support than WP22-10, and it should be denied for the same reasons.

In denying WP22-10, the FSB acknowledged that it ran counter to the directives set out in the Alaska National Interest Lands Conservation Act of 1980 ("ANILCA") because the FSB "may only restrict non-subsistence uses on Federal public lands if it is necessary for the conservation of healthy populations of fish and wildlife, to continue subsistence uses of such populations or for health and human safety reasons."<sup>1</sup> The FSB found that the proposal did not meet the criteria for a closure or restriction to non-subsistence uses. WP24-06 suffers from the same deficiencies.

SCI fully understands and supports ANILCA's directives that subsistence use must be prioritized, and that non-subsistence use must be limited if a conservation need exists. However, the population of Sitka black-tailed deer in this area is healthy. There is no reason for non-subsistence hunting to be restricted to protect subsistence use. Accordingly, SCI urges the FSB to reject WP24-06.

<sup>1</sup> See Greg Risdahl, representative from the United States Forest Service, testimony on WP22-10 at the FSB Fisheries Regulatory Meeting, available at <https://www.doi.gov/sites/doi.gov/files/fish-fisheries-regulatory-meeting-2-feb-23.pdf>.

SCI Comments on Wildlife Proposal 24-06  
 June 30, 2023  
 Page 2 of 4

### **Safari Club International**

Safari Club International, an IRC § 501(c)(4) nonprofit organization, has approximately 70,000 members and advocates worldwide. SCI has two chapters and approximately 1,600 members and advocates who live and hunt in Alaska. Many SCI members live in urban areas in southeastern Alaska, and therefore would face reduced hunting opportunities if WP24-06 were adopted. In addition, many SCI members are professional hunters and guides in Alaska, whose livelihoods will be affected by this proposed restriction. Many nonresident SCI members visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

SCI's missions include conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation and wildlife management tool. SCI has long been an advocate of fair and equitable access to game resources in Alaska. And while SCI supports a subsistence priority as appropriate, SCI is concerned about the lack of biological or conservation support for WP24-06.

### **WP24-06's proposed closure is not authorized by ANILCA.**

The FSB should reject WP24-06 because it requests relief outside the subsistence priority established in ANILCA. ANILCA Section 815(3) allows the FSB to close federal lands to non-subsistence hunting in very limited circumstances. The statute provides that "[n]othing in this title shall be construed as . . . authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands . . . unless necessary for the conservation of healthy populations of fish and wildlife," or "to continue subsistence uses of such populations."<sup>2</sup> Thus, ANILCA preserves rights of non-subsistence hunters to share in hunting opportunities on public lands, unless "necessary" to protect either the wildlife resource or the subsistence priority. ANILCA does not authorize restrictions due to perceived "competition" between user groups.<sup>3</sup> WP24-06 makes no showing that this limited restriction standard has been satisfied.

Significantly, the deer population in GMU 4 is one of the largest in the state.<sup>4</sup> Pellet group transects, aerial alpine counts, and spring mortality surveys show a healthy deer population and do not suggest a decline in deer abundance or a conservation concern for the GMU 4 deer population.<sup>5</sup> A closure for NFQUs would not be "necessary" to ensure the "continued viability"

<sup>2</sup> 16 U.S.C. § 3125(3).

<sup>3</sup> *Natchik Traditional Council v. United States*, 227 F.3d 1186, 1192 (9th Cir. 2000) (finding that although ANILCA emphasizes the importance of subsistence lifestyles, its other goals include the preservation of recreational opportunities for sport hunting which inherently results in competition).

<sup>4</sup> FSB, FSB Public Materials (Volume II, Book C 2023), at 840, available at <https://www.doi.gov/sites/doi.gov/files/book-c-1-non-consensus-agenda.pdf> ("FSB 2023").

<sup>5</sup> *Id.* at 847.

863 Comments on Wildlife Proposal 24-06  
June 30, 2023  
Page 3 of 4

of a healthy Sitka black-tailed deer population. The proponents of WP24-06 do not even try to assert that the closure is necessary for conservation purposes.<sup>9</sup>

The closure is also not necessary for the continuation of subsistence uses. Based on reported harvest data, hunting effort, and harvest success rates, the success of Federally Qualified Users ("FQUs") has generally been stable and favorable over the last ten years.<sup>10</sup> According to Alaska Game and Fish Department ("ADFG") data, FQUs, including Pelican hunters, have seen a decrease in the number of days of hunting effort required to harvest a deer.<sup>11</sup>

Notably, hunting effort by NFQUs has declined over the last twenty years. Accordingly, the data indicate that crowding and competition from NFQUs has not increased—but has decreased. Thus, the closure is not necessary for the continued subsistence use of FQUs. Since the proposal does not satisfy ANILCA, the FSB must decline to accept it.

**WP24-06 should be rejected because it does not comply with FSB regulations authorizing restrictions.**

It is also improper to close federal public lands because WP24-06 does not satisfy the regulatory criteria that allows the FSB to restrict non-subsistence harvest. As noted above, under limited circumstances specified in Title VIII of ANILCA, the FSB is authorized to restrict, close, and reopen federal public lands to the non-subsistence hunting of wildlife.<sup>12</sup> The FSB has implemented these provisions in regulations, which provide that the FSB may only approve a proposed restriction of non-subsistence uses of a particular wildlife population if "necessary for the conservation of healthy populations of fish or wildlife, to continue subsistence uses of fish and wildlife, or for reasons of public safety or administration."<sup>13</sup> None of these limited justifications exist on the facts presented.

GMU 4 hosts one of the largest deer populations in the state. The ADFG's comprehensive data do not suggest a decline in deer abundance or a conservation concern.<sup>14</sup> Further, the closure would not be necessary for continued subsistence use. Data show that over the last twenty years, FQUs' effort to harvest deer have remained low while their success has increased. NFQUs' days of effort have also declined, reducing the potential overlap of hunting days between the two groups.<sup>15</sup> The proposal cites no data in support of its assertion that subsistence harvest will benefit from closing non-subsistence use, and the mere statement that subsistence use has

<sup>9</sup> FSB, Federal Subsistence Management Program 2024-2026 Wildlife Proposals (Part I), at 17, available at <https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf>.

<sup>10</sup> FSB 2023 at 855.

<sup>11</sup> *Id.* at 856.

<sup>12</sup> 16 U.S.C. §§ 3114, 3125(3), 3126(n).

<sup>13</sup> 36 C.F.R. § 242.10(d)(4)(vi).

<sup>14</sup> E.g., FSB 2023 at 840.

<sup>15</sup> FSB 2023 at 855.

SCI Comments on Wildlife Proposal 24-06  
June 30, 2023  
Page 4 of 4

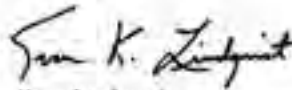
declined due to competition with NFQUs is unsupported.<sup>13</sup> The proponents do not cite any concerns about public safety or administration.

The proponents have not demonstrated a conservation need, a subsistence continuation concern, or a concern for public safety or administration. Therefore, the FSB should not approve WP24-06 because it does not meet the standards set forth in its implementing regulations.

### Conclusion

SCI urges the FSB to follow their reasoning from February 2023, and to reject WP22-06. Thank you for the opportunity to comment on this important proposal. If you have any questions or need anything further, please contact Madie Demaske, SCI Litigation Associate, at [litigation@safariclub.org](mailto:litigation@safariclub.org).

Sincerely,



Sven Lindquist  
President, Safari Club International

<sup>13</sup> See SERAC Proposal, Federal Subsistence Management Program 2024-2026 Wildlife Proposals (Part I), at 20, available at <https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf>.

7/7/23, 11:38 AM

Mail - McKinney, Kayla T - Outlook

Fw: [EXTERNAL] Opposition to 2024-2026 Wildlife Proposal WP24-06

Gould-Fehrs, Sherri L <sherri\_gould-fehrs@fws.gov>

on behalf of

AK Subsistence, FW7 <subsistence@fws.gov>

Thu 6/15/2023 2:58 PM

To: McKinney, Kayla T <kayla\_mckinney@fws.gov>; Matuskowitz, Theo TM <theo\_matuskowitz@fws.gov>; Grediagin, Lisa M <Lisa\_Grediagin@fws.gov>; Holman, Kendra B <kendra\_holman@fws.gov>

Office of Subsistence Management

U.S. Fish and Wildlife Service - R7

1011 E Tudor Rd, MS 121

Anchorage, AK 99503-6199

(907) 786-3888 phone

(907) 786-3898 fax

Website: <https://www.doi.gov/subsistence>

Like us on Facebook! [www.facebook.com/subsistencealaska](http://www.facebook.com/subsistencealaska)

From: Alan Steininger <al\_steininger@yahoo.com>

Sent: Thursday, June 15, 2023 9:44 AM

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

Subject: [EXTERNAL] Opposition to 2024-2026 Wildlife Proposal WP24-06

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This proposal, if approved, would close deer hunting on Federal public lands draining into a large part of the Pelican area, between November 1st and November 15th, except by Federally qualified subsistence users.

The apparent reason for this proposal is not a conservation issue but a perceived notion that only non-federally qualified users are making it difficult for Pelican's Federally qualified subsistence users to meet their subsistence needs in one, specific, two week period. This proposal did not consider the same difficulties created by groups of Federally qualified subsistence users from outside of the Pelican area who hunt in the same area and time period. Anchoring boats in small bays and causing deer to be more skittish and wary is not limited to just non-federally qualified users.

With the exception of Juneau, all residents in the Northern Southeast Alaska Region are Federally qualified subsistence users. Some of the local cabins are owned by a small number of Juneau residents who hunt in the Pelican area. Through observation and without documentation, it is hard to accept that a small number of the Southeast region's non-federally qualified residents alone have made it difficult for Pelican residents to meet their subsistence needs by hunting during this specific two week period.

Considering that the abundance of deer in the Pelican area has been documented by the Alaska Department of Fish and Game and the unsubstantiated difficulties stated, this proposal should not be approved.

Submitted by: Al Steininger

(907)209-8508

al\_steininger@yahoo.com

<https://outlook.office365.com/mail/inboxid/AAQkADgTNGE1ZTUxLWJNDiBNDAxY04MjhlTkwyYjA4M2JlYTkwYgAQAF%2B4SbubuJFps7IFvPcC%...> 1/1



June 29, 2023

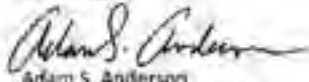
ATTN: Tino Matuskowitz

I find it hard to believe we are here again after last year's discriminatory and unscientific proposals (WP-22-7, WP22-08, and WP22-09). The resources that were spent to contest the proposals are real dollars and to see another set of proposals so similar which are based on **subjective statements and emotions** is alarming. I once again **strongly disagree** with the current proposals – WP24-04 – WP25-05 – WP26-06 and find the proposed restrictions potentially stressful on Juneau hunters, unnecessary, and polarizing. I also feel those who keep bringing these proposals forward need to be held accountable to repay the monetary resources that are spent to refute.

- ✓ **Juneau residents may miss deer, causing deer to be skittish** – There is no verifiable data on the shooting accuracy of Juneau hunters versus others or the measurable correlation of missing a deer and the future productivity of a geographic area. I have personally harvested deer in the same location multiple times throughout a hunting season.
- ✓ **Juneau hunters obstruct access by taking best anchorages** – what constitutes a "best anchorage"? How many are there? Has someone actually looked up the registrations of these boats to verify where the owners are from? Perhaps there from Haines, Skagway, Gustavus? I would also argue that rural residents unequivocally have the advantage to all the best access because they live there. Furthermore, they do not have the burden to travel in November from Juneau. More often than not southern Lynn Canal, Icy Strait, and Northern Chatham are unsafe for travel. If you restrict hunting access to a calendar in November it may be the only week or two it's even possible to safely navigate the treacherous water ways. In other words when the weather allows you to travel we need to go!
- ✓ **Juneau hunters are causing a safety concern** – Limiting access and congregating Juneau hunters will actually help create a safety concern. What's next shall Juneau residents discriminate against Alaskan neighbors based solely on their zip code from going to Juneau? Restricting their movement and access to Costco/ Fred Meyers / Western Auto during peak shopping times? One could arguably make the same case because of the increase in car traffic they are ruining our carbon footprint. Taking the best parking spots, and creating a public safety concern on our highways. Not to mention the air we breathe and the increase probability they could spread COVID or another unwanted safety risk. This type of radical thinking has no end and needs to be abolished.
- ✓ **Juneau hunters are not allowing parking spaces to hunt in HNNH** – This is probably the most ridiculous of all the proposals. It's obvious whoever wrote this does not actually travel the logging road infrastructure that is in place surrounding Hoonah on Chichagof Island. The opportunities to get out of your vehicle and hunt are limitless simply by pulling off to the side of the road.

In conclusion we need to stop playing politics and listen to the wisdom from Alaska Department of Fish & Game's conclusion to WP22-07, WP22-08, and WP22-09 "after examining decades of data, the Alaska Department of Fish and Game's Division of Wildlife and Conservation concluded that the hunting regulation changes are not needed and would unnecessarily deprive some hunters of opportunity." I am hopeful this will once again be the outcome to these new proposals.

Sincerely,



Adam S. Anderson

18671 Ocean View Drive  
Juneau, AK 99801

June, 23, 2023

TO:  
Federal Subsistence Board - Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 East Tudor Road, MS-121  
Anchorage, AK 99503-6199  
subsistence@fws.gov

Southeast Subsistence Regional Advisory Council  
c/o Dr. Anna Perry  
P.O. Box 21628  
Juneau, AK 99802  
Phone: 907-209-7817; E-mail: dranna.perry@hda.gov

FROM:  
Roger Harding  
1785 Mendenhall Peninsula Road  
Juneau AK 99801

Re: WP 24-06 (Primarily) but also WP24-04 and WP24-05

Dear Southeast Subsistence Regional Advisory Council:

I am writing these comments to express my opposition to WP24-06, but my comments are also germane for WP24-04, WP24-05. This proposal seeks to reduce the opportunity of non-federally qualified users (NFQUs) to participate in Ulsinski Inlet deer hunting. The Alaska Department of Fish and Game (ADFG), issued June 7, 2021) has made it abundantly clear that there is no conservation concern for deer in the Ulsinski Inlet area, and the available data indicates that deer populations in the area remain abundant. Furthermore, the best available data suggests that it is unlikely that hunter harvest has reduced deer abundance in this area.

The proposal specifically seeks to "eliminate competition" during the prime deer hunting period to only FQU in the Pelican area. Not only is this time of year arguably the best, and some of the "most efficient" hunting times for harvesting deer, it is also the prime time for hunters to participate, including non-FQUs. Traditionally, this is a time of year when family and friends get together in Pelican to hunt and spend time together around the Thanksgiving holiday. There are many families and groups of friends who have spent part of their lives in Pelican but have had to move elsewhere for medical, education, or economic reasons. Imagine a scenario where a family and their friends gather in Pelican for Thanksgiving and to hunt, just as they have for many years. However, if this proposal is adopted not everyone in the family would be eligible to legally hunt deer. If adopted, this proposal could fracture long-time bonds of many traditional hunting groups and generations of family and friends who have hunted together for years.

If the intent of this proposal is to eliminate non-Pelican based hunters, then I think this proposal will fall short, as FQU from Haines, Gustavus and Sitka would still be allowed to hunt during the proposed time closure. There are of course hunters who do come from Juneau (like myself), and they often have deep

roots or economic or personal connection to Pelican. If this proposal is adopted and this logic is applied to other resources that become harder or more time consuming to harvest, then only FQU would be allowed to harvest, salmon, rockfish, or shrimp in the Pelican area at the peak of their seasons. Is this the road or direction the Federal Subsistence Board wants to go down?

While I do not endorse the following suggestions, I am including them only as possible alternatives to reduce the feeling of competition:

- 1) In order to avoid competition from NFQU, allow only FQU to hunt on every Wednesday from Aug 1 – Dec 31. This would provide an opportunity to hunt without competition throughout the season.
- 2) Install mooring buoys (USFS or others) in areas where anchoring a skiff can be problematic during deer hunts. This could open up more areas for all hunters throughout the season.
- 3) Allow NFQU to hunt during January if the two week closure in November is adopted.
- 4) Go through the Board of Game process to limit the number of guided deer hunts in the Pelican area.
- 5) Allow only one or two deer to be harvested per NFQU in the Pelican area during the proposed time frame. This might reduce the perceived believe that dozens of deer are being harvested by non-FQU hunters.

I fully support the concept that FQUs should have priority for the resources needed to ensure that rural residents can feed their families and continue to live in rural areas. However, changes to the Federal Subsistence Management are only allowed and necessary when there are conservation concerns for these resources, and this is certainly not the case for deer in the Lisianski area.

I have owned property within the City of Pelican for the last 25 years (33019 Whiskey Flats), paid my property taxes, and enjoyed the hunting and fishing opportunities available in Lisianski Inlet. While my principal residence may be in Juneau, the best part of having property in Pelican is the enjoyment of being part of the wonderful community of people who live in the Lisianski Inlet. If a conservation concern for deer populations in the area ever did occur, I would absolutely support a proposal to limit harvest by NFQUs, but that is not the case right now.

The comments I have provided in opposition to WP24-06 are based upon data and analysis that clearly shows there is no conservation concern for deer populations in Lisianski Inlet. My comments also apply in opposition to WP24-05 and WP24-04, which have also shown no conservation concerns, and if passed, would limit opportunities for NFQU hunters to harvest deer on Admiralty Island as well as in the Pelican area. All of these proposals are contrary to ANILCA Section 816(b), and if adopted, would cause undue hardship to Alaskans from Juneau, Ketchikan, and other areas outside of Southeast Alaska, as well as non-resident deer hunters. The intent of the ANILCA was to ensure a subsistence priority and restricting deer harvests opportunities by NFQUs is only authorized for the conservation of healthy populations. If adopted, these proposals would not follow the intent of ANILCA as directed by Congress.

Thank you for the opportunity to comment on these proposals.

Sincerely,

Roger Harding

To whom it may concern,

I am writing in regards to the following proposals:

Admiralty: WP24-04

Chilchagof (Hoonah): WP24-05

Ulsianski (Pelican): WP24-06

I am a lifelong Alaskan who lives in Juneau. I hunt in the Pelican area described in the proposal, but would like to speak to all of the proposals. I would suggest, as someone who hunts the Pelican area every year for last ~10 years, that the last few years have been much more difficult to harvest deer during the fall. This has likely caused these communities to look for someone to blame. Juneau (or non-local) hunters are an easy target; however, I do not believe the correct one.

I am deeply sympathetic to the needs of individuals living in the small communities of Southeast Alaska. The hardships endured by these folks are very real. However, I do not see limiting hunting access as a solution. Every study that has ever looked at the topic has found that hunter predation on the Sitka Blacktail Deer population in Southeast Alaska has found that hunting is an insignificant contribution to loss of deer. I certainly understand that it would be challenging for a local from any of these communities to see hunters not from their town leaving with deer, when they themselves haven't been able to harvest deer.

I believe the explanation for the apparent "shortage" of deer has been warmer winter weather not producing as much snow, especially in the early season. For many of these small communities, hunting is performed by driving a boat around looking for deer on beaches. Without enough snow to drive the deer down off of the mountains, I have seen less deer on beaches in the last few years. However, if one is willing to go into the woods, there are plenty of deer to be found at higher elevations. This matches with any of the recent deer surveys suggesting there are no major drops in deer populations in these regions.

I believe that these smaller communities hope for plentiful, easy to shoot deer on the beaches will not happen regardless of whether these proposals are passed or not. It will depend more on whether there are early and heavy snowfalls. I would respectfully request that you reject all of these proposals as I believe they would not address the proposed concerns, and would unfairly limit one group of Alaskan's access to a plentiful resource.

Justin Doe  
Juneau, Alaska



Wildlife Proposals 24-28 and 24-29 (which we support!) seek to lower the caribou bag limit and allowance to take so many cows for all users on federal lands within the WACH's range and should either of those pass we believe they will help protect cows, allow the herd to begin to rebound, and make a permanent caribou hunting closure to NFQU unnecessary.

As the herd increases, these temporary caribou hunting closures to NFQU should be rescinded.

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**Wildlife Proposal WP 24-26 – extend the temporary Dall sheep hunting closure for all users on federal lands in Unit 24B and 26B west of the Sagavanirktok River through the 2024-2026 cycle**

#### OPPOSE

We respectfully request that the board defer this proposal, as the Board of Game will be meeting in March 2024 to deliberate on proposals that if passed will address sheep conservation concerns in the central Brooks Range and imposing limits on nonresident sheep hunters.

As stated in our previous comments, RHAK is very concerned about sheep declines across the state, especially state regulations that allow unlimited nonresident sheep hunting, which requires hiring of a guide. There are proposals before the Board of Game seeking to limit or restrict nonresident sheep hunters in Units 24B and 26B who account for over 40% of the harvest of sheep in these areas.

The FSB does not have the authority to limit only nonresident, non-local sheep hunters, and we do not believe resident sheep hunters need to be restricted in these units. These areas are one of the only road-accessible areas where resident sheep hunters can access the sheep, and they are primarily restricted to archery-only hunting (with a very low success rate) within the Dalton Highway Corridor Management Area.

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**Wildlife Proposals 24-04, 24-05, & 24-06 – close portions of federal lands on Admiralty and Chichagof Islands to deer hunting by NFQU from Nov 1 – 15**

#### OPPOSE

These 3 proposals are essentially do-overs of those that were not passed by the board in 2023, and the rationale the board used to deny those deer hunting restrictions to NFQU on portions of the ABC Islands in Unit 4 last year very much still applies to these proposals.



Data from the Alaska Department of Fish & Game debunked claims in proposals heard by the board in 2023 that deer populations in Unit 4 were down. Deer populations in Unit 4 are abundant and healthy and near carrying capacity. And there was absolutely no real evidence by proponents of deer hunting restrictions on NFQU that subsistence needs were not being met.

The same applies to these proposals before the board for the 2024-2026 cycle.

As to evidence of subsistence needs not being met, we again did not see any such evidence in Wildlife Proposals 24-04, 24-05, or 24-06. NFQU are *not* "obstructing access," nor are they altering deer behavior, as stated in WP 24-04. The one factual statement in WP 24-04 is that NFQU compete with locals for the deer resource. But that does not mean that such competition prevents subsistence needs from being met during the peak of the rut Nov 1 -15, which is when proponents of these proposals want non-local deer hunters restricted.

As mentioned in our RHAK testimony before the board last year, "competition" alone is not a valid reason under ANILCA guidelines to restrict NFQU. We explained that of course every hunter would like it if he or she was the only one in the field, but that is not a valid reason to restrict others. We also mentioned that the opportunity to hunt is never a guarantee that one will be successful. One individual hunter who may not have been as successful as he or she was in the past is not at all an example that subsistence needs are not being met.

We urge the board not to set precedent by passing these proposals that would essentially use "competition" alone as the rationale for restrictions on NFQU. Without concrete evidence that subsistence needs are not being met because non-locals are allowed to hunt during the same period as locals, these proposals should be voted down.

Thank you board members for your attention to our comments.

Sincerely,

Mark Richards

Executive Director Resident Hunters of Alaska

[www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)

**From:** [Charles Schultz on behalf of AK Subsistence FW7](#)  
**To:** [Deena Perry-Baultier; Robert Jones](#)  
**Subject:** FW: (EXTERNAL) Deer closure comment for Southeast Alaska  
**Date:** Wednesday, October 25, 2023 2:19:12 PM

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 U.S. Fish and Wildlife Service - H7  
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**From:** cjs16@me.com/cjs16@me.com  
**Sent:** Wednesday, October 25, 2023 11:29 AM  
**To:** AK Subsistence, FW7 <[subsistence@fwc.gov](mailto:subsistence@fwc.gov)>  
**Subject:** (EXTERNAL) Deer Closure comment for Southeast Alaska

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All people can equally compete for deer in Southeast Alaska on Federal and State Lands. That is fair to all hunters wishing to live a subsistence lifestyle, regardless of their address.

Some communities already have extended seasons for deer harvest to allow deer when they are the most vulnerable, in January.

The biggest killer of deer in Southeast Alaska is Winter.

If any thing, if there are less deer near Angoon or Hoonah it is most likely that they are shooting any deer possible during January, with no regard to age or sex. Killing female deer and immature deer is a sure way to decrease next year's opportunity to shoot more bucks and larger deer.

I oppose any subsistence priority based on race, gender or address.

Respectfully,  
 CHARLES SCHULTZ  
 Juneau, Alaska  
 Lifetime Sportsman

**From:** [Wesley, Katrina](#) on behalf of [AK Subsistence, FW7](#)  
**To:** [Roberts, Jason S](#)  
**Subject:** FW: [EXTERNAL] Deer closures  
**Date:** Wednesday, October 25, 2023 10:18:58 AM

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**From:** Richard Morris <[akreeideal@gmail.com](mailto:akreeideal@gmail.com)>  
**Sent:** Wednesday, October 25, 2023 10:05 AM  
**To:** AK Subsistence, FW7 <[subsistence@fwis.gov](mailto:subsistence@fwis.gov)>  
**Subject:** [EXTERNAL] Deer closures

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I am against any deer closures. ADF&G has been researching blacktails and the numbers show there are plenty of deer available to all hunters.

Rich Morris

**From:** [Victoria, Karpova on behalf of AK Subsistence, FW7](#)  
**To:** [Juneau.com@alaska.gov](#); [Roberts, Jason S](#)  
**Subject:** Re: [EXTERNAL] Deer Proposals  
**Date:** Wednesday, October 25, 2023 10:20:20 AM  
**Attachments:** [phone-icon\\_f117a4913-3bf4-4672-a720-bd758ae0547.png](#)  
[email-icon\\_8036f9dc-4d30-4241-b622-f39eaf89f4ee.png](#)  
[website-icon\\_0bbbf725-f9ae-4f02-8794-0c3c79fcd08.png](#)  
[in\\_3d4d5c43-908b-4405-b62d-580177b69286.png](#)

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**From:** John DeMuth <[jdemuth@pndengineers.com](mailto:jdemuth@pndengineers.com)>  
**Sent:** Wednesday, October 25, 2023 10:10 AM  
**To:** AK Subsistence, FW7 <[subsistence@fws.gov](mailto:subsistence@fws.gov)>  
**Subject:** [EXTERNAL] Deer Proposals

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SRAC.

I am writing to voice my opposition to the proposed deer closures, as specifically identified in WP24-04, 05 and 06. As was the case with the previous, similar proposals, these are political in nature and represent subjective opinions of a small, select group that is in complete contrast and contrary to all available scientific and biological evidence which is why ADFG opposes these as well. I ask that common sense be used to consider the benefit of all Alaskans and not give-in to the special interest groups pushing these proposals.

Best Regards,

**John DeMuth, PE, SE | Vice President**  
**9350 Glacier Highway, Suite 100, Juneau, AK 99801**  
 (O) 907.506.2003 | (M) 907.321.1645

**From:** [Hewitt, Kaitlin](#) on behalf of [AK Subsistence, FW7](#)  
**To:** [Deanna Perry-Bull](#); [Roberts, Jason S](#)  
**Subject:** FW: (EXTERNAL) Proposed Deer Hunting Closures  
**Date:** Wednesday, October 25, 2023 10:19:19 AM

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**From:** Alex Reid <[alex.reid.2017@gmail.com](mailto:alex.reid.2017@gmail.com)>  
**Sent:** Wednesday, October 25, 2023 10:06 AM  
**To:** AK Subsistence, FW7 <[subsistence@fws.gov](mailto:subsistence@fws.gov)>  
**Subject:** (EXTERNAL) Proposed Deer Hunting Closures

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This email is in regards to the proposed closure for deer hunting:  
 WP24-04 - Angoon deer closure  
 WP24-05 - Hoonah deer closure  
 WP24-06 - Pelican deer closure

I would like to state that I am against these proposed closures. ADG&G has performed studies and proven that claims made in support are completely unfounded and emotionally charged. They have no scientific backing. Why make a decision that will damage inter-community relationships if there will not be any benefits. Giving one group more rights than another creates division among Alaskans. Individuals who live in these communities already have a major advantage in hunting these areas and with minimal effort can fill their tags. It is much more difficult for hunters from Juneau to fill their tags, it is far better to let hunters come into these communities and support the local economy.

**From:** [Woods, Katrina](#) on behalf of [AK Subsistence, FW7](#)  
**To:** [denny.corbin@alaska.gov](#); [Roberts, Jason S](#)  
**Subject:** FW: (EXTERNAL) WP24-06 - Pelican deer closure  
**Date:** Wednesday, October 25, 2023 10:39:21 AM

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**From:** [denny.corbin](#) <[dennycorbin.dc@gmail.com](mailto:dennycorbin.dc@gmail.com)>  
**Sent:** Wednesday, October 25, 2023 10:18 AM  
**To:** AK Subsistence, FW7 <[aksubsistence@fws.gov](mailto:aksubsistence@fws.gov)>  
**Subject:** (EXTERNAL) WP24-06 - Pelican deer closure

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I strongly disagree that Pelican residents need more subsistence only hunting time. There is no shortage of deer and they have the entire regular season plus an extra month.

The sentiment to close hunting for non-subsistence is driven by other issues than deer population or hunting competition.

Federal Subsistence managers have a big problem that they seem incapable of addressing. That there are very few job opportunities in rural Alaska which drives young people to move away to the city in order to make enough to survive beyond "own nothing and being happy". They then are not allowed to come home and subsist.

Subsistence laws are destroying traditional hunting passed down over generations by making outlaws of people who are just trying to survive and are trapped between two worlds.

In an area with the highest level of fish and game in the world there is no need to give special status to sub-groups of citizens.

Denny Corbin



10/24/23 RAC meeting

\*6 mile

\*5 talk

Thank you Mr Chair -

Hello- Thank you for this opportunity to comment.

I'm Mike Bethers, a 75 yr old lifelong deer hunter from Luke Bay. I ~~been~~ <sup>have been</sup> operating about 50 days a fall hunting deer on Admiralty and Chuchagof with most of my effort in Tenakee. I haven't been on the Hoonah road system in decades. Never shot a deer near the road, from a vehicle or boat. I like to hunt deer ~~on their own ground~~ in the woods and still hunt and use a call. I ~~have been getting~~ all the deer my family needs and I let many more deer walk away.

If an old guy in my condition can do ~~this~~ <sup>it</sup> I can't understand why FQ hunters are not taking advantage of the currently robust deer populations. Instead of taking advantage of their current priorities and putting meat in the freezer, FQ hunters are coming up with unjustifiable proposals that would really foul up deer hunting for me and other NFA hunters.

Very similar

Subsistence deer proposals 22-07, 22-08 and 22-10 were ~~soundly~~ defeated earlier this year because available data showed that 1-decreased <sup>FQ</sup> harvest was not due to competition from NFA hunters from Tso but rather to documented <sup>reduction</sup> of hunting effort in Angoon, Hoonah and Pelican - and

↓



2

- 2- There is absolutely no shortage of deer or no known conservation concerns - and
- 3- Proposed closures would actually cause increased conflict between FQ and NFA hunters on state tidelands

These current proposals, WP-24-04, 24-05 and WP24-06 should also be withdrawn or defeated ASAP because -

- 1- There is no apparent increase in FQ hunting effort or <sup>obvious</sup> attempts to increase FQ deer harvests - and -
- 2- Deer populations in NSE are at <sup>or near</sup> carrying capacity and near all time highs - there's even more deer this yr than last year.

What is a "meaningful priority"? If current priorities aren't "meaningful," what is? FQ hunters already have -

- 1) Seven full months (over  $\frac{1}{2}$  the yr) to <sup>legally</sup> hunt deer - <sup>1 month over NFA</sup>
- 2) Designated hunter program so FQ don't have to shoot their own deer and -
- 3) FQ hunters live right in the hunting areas where deer are readily available

FQ hunters submitting these proposals already have significant priorities and they are not taking advantage of them, ~~or expending additional effort to put meat in the freezer~~



3

Please note that all three communities submitting these proposals already have the best (most efficient) deer hunting in the state of Alaska.

Specific comments for Angoon WP 24-04

Angoon's population has dropped 38%. FQ deer harvest has dropped 37% since 2007. The number of hunters is down 23% and overall hunting effort down 43%. ~~Hunting effort~~ is clearly down, however, Angoon hunters who prior to 2006 took 2.1 days to harvest a deer now need only 1.9 days. - Just about the most successful deer hunting in the state.

Angoon proposes to close a very large area to NQ hunters, but only 25% of their annual harvest comes from this area. Obviously, Angoon hunters travel much farther to hunt even with high fuel + travel costs.

Aerial alpine deer surveys this summer showed the highest deer counts on Southern Admiralty. Also, two parties I know who made alpine hunts in the proposed closure saw more deer than ever before.

Also, the <sup>average</sup> 29 NQ hunters hunting Angoon are likely property owners or have ties with Angoon residents.





4

An average of 36 non-Angoon hunters hunt this area annually and its been stable for 25yrs  
There is not a big fleet of AQ hunters randomly travelling to Angoon to hunt deer

Another observation shows that subsistence/pers use fishing permits issued in Angoon has dropped 60+ % since 2013. It looks like a significant reduction in Angoon subsistence fishing and hunting activity

#### Specific Comments for Hoonah WP24-05

From 2013 - 2022 the number of active FA Hoonah hunters dropped 23%, and total hunting effort in days dropped 54%, even though population increased (8%).

Hoonah pretty well Gut shot its local wildlife habitat and hunting area by building miles of roads and clearcutting thousands of acres of excellent deer/wildlife habitat. Now the long term impacts is what we must deal with. The roads and new clearcuts made deer hunting very easy, but now when clearcuts have grown up, and after shooting many generations of road/ditch dwelling deer, things are different. Locals tell me that soon after doe seasons that deer get scarce along the roads. Surviving deer now live in the woods - off the roads.





5

Local Hoonah hunters climbing hills and hunting timber away from the roads tell me they have no problem getting all the meat they need. Actually, Hoonah hunters still getting out there are having better success than in the past. This summers aerial deer surveys showed very high numbers of deer on mountain tops near Hoonah.

The great numbers of NFO hunters reported flocking to Hoonah likely includes non-local FO hunters as well. The number of non-local hunters using Hoonah has actually dropped 20% from 2013-2022. Reduced ferry service may have something to do with this.

Also note that even though Hoonah population has increased 8%, the number subsistence/pers use fishing permits has dropped 40% since 2013. It looks like interest in hunting and fishing in the villages is dropping. I wonder what modern Technology and interests of our young people have to do with this?

Specific Comments for Pelican WP 24-06

Pelicans population has dropped 40%. The number of



6

hunters is down 35% and hunter effort in hunter days is down 53%. Pelican hunters have the best documented deer hunting in SE AK, but with so few hunters, how do they expect harvests at decades ago?

### In Conclusion

FQ hunters don't need any increased priority to the deer resource. They already have a month longer season than NQ hunters which makes a 7 month long season. FQ hunters can easily use designated hunters to shoot their deer. FQ hunters live in villages located right in the hunting areas - and contacts living in the villages tell me that <sup>there are</sup> a deer also living in the villages.

FQ hunting effort in Angoon, Nekeah and Pelican remains down 43% to 53% from days past while deer populations are at the top of the chart.

And There are simply not enough NQ hunters <sup>hunting</sup> at the proposed closures to impact local FQ deer harvest.

Given the current robust deer populations, lack of FQ hunter effort and potential conflict that proposed closures would cause between FQ and NQ hunters, there is no <sup>logical</sup> justification available in ADILCA ~~process~~ to support the proposals





7

WP 24-04, 24-05 and 24-06 should be rejected at the earliest opportunity

It looks like hunting and fishing may be losing interest in the villages. I would suggest that hunting, fishing and subsistence methods be injected into locals schools to promote this life style in the communities.

Keep in mind that Angoon, Hoahoh and Relican already have the best deer hunting in the state. However, why don't they propose to extend the "seal" subsistence season two weeks into February? This would not have any impact on NA hunters and FA could have exclusive use of the resource on the beach where they could be harvested in a most efficient manner. Doe's fetus's may be a little larger, however, shooting a pregnant doe in early February would be no different than shooting her in mid December.

### Subsistence Deer Issues

- Pelican is far different than Angoon and Hoonah.
- 90 nautical miles from Auke Bay at Juneau. Traveling to and from JNU by private boat is very weather dependent. Short daylight hours make this even more problematic in November.
- Airfare is expensive; over \$500 not counting excess baggage. Weather can cause flight cancellations; we have seen them for as long as two weeks.
- If a person does not have family or friends to stay with; you have no place to sleep or cook.
- Ferry service is extremely limited. In the past we have had one LeConte sailing a few days prior to Thanksgiving. In 2023 this sailing has been moved to November 7th. So, if you are a JNU based hunter you better be on board to return on that date.
- There are 4 JNU residents that have invested in property on the outskirts of Pelican. All of these land parcels have relative new houses on them; all were built by hired Pelican residents. By my best count these parcels could add 12 non-federally qualified hunters if they could make it out to Pelican.
- As a federally qualified hunter I would much rather see these potential hunters spread out over the sport season; not focusing their efforts just prior to the proposed restricted subsistence season starting on November 1st.
- Pelican's population has decreased drastically since the early years of my hunting out here starting in the late 1960's and continuing to the present. In 1966 I was one of 70 seasonal workers at Pelican Cold Storage; now we have a winter population of maybe 70 men, women, and children.
- Contrary to recent commentary, it is my understanding that Juneau's population has decreased.



- It is my observation based upon game camera and personal viewing that the deer population has not decreased.
- I serve on both the local ADF&G Advisory Board and the City Council. There has not been any public meeting where this subsistence issue has been discussed since it was voted down by the State Board.
- I would like to know more about how the "social surveys" are conducted. The volunteer interviewer should be provided with a short list of questions that must be asked, the provider's name listed and hunting license #. This should be public information and shared with ADF&G.
- I hope you all have taken the time to read my June 15th letter to the Board. I remain opposed to 24-06.

Federal Subsistence Board  
Attn: Theo Matuskowitz  
Office of Subsistence Management  
1011 E. Tudor Rd. M/S 121  
Anchorage, AK 99503-6199

June 28, 2023

Dear Federal Subsistence Board,

Please accept this letter as the official public comment from the ADFG Juneau Douglas Advisory Committee in opposition to the federal Unit 4 deer proposals (WP24-04, WP24-05, WP24-06) to be considered at the Oct 2023 meeting. We understand that the proposal's authors wish to ensure a significant and meaningful priority is afforded to all Federally Qualified Users (FQUs). As our comments on previous iterations of these proposals have noted (see attached), we do not feel these proposals address this concern. Instead, they create significant loss of opportunity for non-federally qualified users when there do not appear to be conservation or FQU hunter-success concerns. In considering the Unit 4 deer proposals from 2022, the Federal Subsistence Board heard testimony to this effect and declined to pass those proposals. We urge the Board to follow suit and not support these proposals.

Sincerely,

Juneau Douglas Advisory Committee

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

Dear Federal Subsistence Board,

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

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

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

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

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

Juneau-Douglas Fish and Game Advisory Committee • 2022 Proposal Comments

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

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

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

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

Sincerely,

Juneau Douglas Advisory Committee

WP24-09 Executive Summary	
<b>General Description</b>	Wildlife Proposal WP24-09 requests delegating authority to the BLM Glenallen Field Office manager to close, reopen and adjust season dates, set harvest limits including any needed sex restrictions, and set any needed permit conditions for caribou in Units 13A and 13B via Delegation of Authority Letter only and that the Ahtna Intertribal Resource Commission (AITRC) be consulted whenever any in-season management actions may occur. The BLM also requests that the harvest limit for caribou in subunits 13A and 13B be changed from “2 caribou” to “up to 2 caribou.” <i>Submitted by the Bureau of Land Management.</i>
<b>Proposed Regulation</b>	<p><b>Unit 13—Caribou</b></p> <p><i>Units 13A and 13B—up to 2 caribou by Federal registration permit only (FC1302). <del>The sex of animals that may be taken—will be announced by the Glennallen Field Office Manager of the Bureau of Land Management in consultation with the Alaska Department of Fish and Game area biologist and Chairs of the Eastern Interior Regional Advisory Council and the Southcentral Regional Advisory Council</del></i></p> <p><i>Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)</i></p> <p><i>Aug. 1–Sep. 30 Oct. 21–Mar. 31</i></p> <p><i>Aug. 1–Sep. 30 Oct. 21–Mar. 31</i></p>
<b>OSM Conclusion</b>	<b>Support</b>
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	<b>Support</b> WP24-09 <b>with modification</b> to sunset the delegated authority after four years
<b>Interagency Staff Committee Comments</b>	The expanded delegated authority being requested by the Bureau of Land Management in Units 13A and 13B would allow for quicker and more responsive management of the Nelchina Caribou Herd (NCH). Recent conservation concerns have highlighted the need to respond quickly to rapidly changing biological metrics of the NCH. Including the Ahtna Intertribal Resource Commission in the management process will ensure that perspectives and concerns of local rural users are taken into consideration.

### WP24-09 Executive Summary

	<p>The modification suggested by the Southcentral Alaska Subsistence Regional Advisory Council would allow this requested delegation to sunset after four years. However, because delegations of authority are administrative in nature, the Board could choose to reauthorize this delegation after the four-year time period without having to go through the regulatory and public review process. Therefore, any requested sunset period would be made moot by such Board action. Delegations of authority should be viewed as a means to allow for long term and responsive management of wildlife resources on the landscape. Allowing for a sunset of this management tool might not be in the best interests of the resource. Further, before any delegated authority is initiated, the Federal manager is required to coordinate with the Southcentral and Eastern Interior Alaska Subsistence Regional Advisory Council Chairs and the Alaska Department of Fish and Game prior to implementation of any management action affecting the NCH.</p>
<b>ADF&amp;G Position</b>	<b>Support</b>
<b>Written Public Comments</b>	<b>1 Support</b>

## STAFF ANALYSIS

### WP24-09

#### ISSUES

Wildlife Proposal WP24-09, submitted by the Bureau of Land Management (BLM) Glennallen Field Office, requests delegating authority to the BLM Glenallen Field Office manager to close, reopen and adjust season dates, set harvest limits including any needed sex restrictions, and set any needed permit conditions for caribou in Units 13A and 13B via Delegation of Authority Letter only and that the Ahtna Intertribal Resource Commission (AITRC) be consulted whenever any in-season management actions may occur (**Appendix 1**). The BLM also requests that the harvest limit for caribou in subunits 13A and 13B be changed from “2 caribou” to “up to 2 caribou.”

#### DISCUSSION

The proponents state that expansion of the authority delegated to the Federal in-season manager will allow for better management of the Nelchina Caribou Herd (NCH) and more timely responses to changing hunt conditions. Removing the limited authority currently in unit-specific regulations will also simplify Federal regulations.

Establishing a variable harvest limit will allow the in-season manager to adjust harvest limits in response to fluctuations in the NCH population. Conservation concerns regarding the NCH have arisen lately, because of a severe winter and late spring in 2022. High adult mortality and low calf recruitment led to a summer population estimate of only 21,000 caribou, which is well below the State management objective of 35,000-40,000 caribou.

#### Existing Federal Regulation

##### Unit 13—Caribou

<i>Units 13A and 13B—2 caribou by Federal registration permit only (FC1302). The sex of animals that may be taken will be announced by the Glennallen Field Office Manager of the Bureau of Land Management in consultation with the Alaska Department of Fish and Game area biologist and Chairs of the Eastern Interior Regional Advisory Council and the Southcentral Regional Advisory Council</i>	<i>Aug. 1–Sep. 30 Oct. 21–Mar. 31</i>
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<i>Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)</i>	<i>Aug. 1–Sep. 30 Oct. 21–Mar. 31</i>
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## Proposed Federal Regulation

### Unit 13—Caribou

*Units 13A and 13B—up to 2 caribou by Federal registration permit only (FC1302).* *The sex of animals that may be taken will be—  
announced by the Glennallen Field Office Manager of the Bureau of  
Land Management in consultation with the Alaska Department of Fish  
and Game area biologist and Chairs of the Eastern Interior Regional  
Advisory Council and the Southcentral Regional Advisory Council*

*Aug. 1–Sep. 30  
Oct. 21–Mar. 31*

*Unit 13, remainder—2 bulls by Federal registration permit only (FC1302)*

*Aug. 1–Sep. 30  
Oct. 21–Mar. 31*

## Existing State Regulation

### Unit 13—Caribou

*Residents – One caribou by permit*

*YC495 Aug. 1–Aug. 5*

*Or*

*Residents – One caribou by permit per household, available only by application. See Subsistence Permit Hunt Supplement for details*

*RC561 Aug. 10–Aug. 31  
Oct. 21–Mar. 31*

*Or*

*Residents – One caribou by permit per household, available only by application. See Subsistence Permit Hunt Supplement for details*

*RC562 Sep. 1–Sep. 20  
Oct. 21–Mar. 31*

*Or*

*Residents – One caribou by permit per household, available only by application. See the Subsistence Permit Hunt Supplement for details*

*CC001 Aug. 10–Sep. 20  
Oct. 21–Mar. 31*

*Or*

*Residents – One caribou by permit*

*DC485 Aug. 20–Sep. 20  
Oct. 21–Mar. 31*

*Nonresidents – One bull caribou by permit*

*DC475 No open season*

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

Unit 13 is comprised of approximately 13% Federal public lands and consists of 6% National Park Service (NPS) managed lands, 5% BLM managed lands, and 2% U.S. Forest Service (USFS) managed lands.

Unit 13A is comprised of approximately 1% Federal public lands and consists solely of BLM managed lands. Unit 13B is comprised of approximately 18% Federal public land and consists solely of BLM managed lands.

BLM manages additional lands within Unit 13 that are selected for conveyance by the State of Alaska, Native Corporations, or Alaska Tribes and are not currently available for Federal subsistence because of the land selection status. If these land selections are relinquished, they would become lands available for Federal subsistence.

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

Residents of Units 11, 12 (along the Nabesna Road), 13, and Chickaloon have a customary and traditional use determination to harvest caribou in Unit 13A.

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, 20D (excluding residents of Fort Greely), and Chickaloon have a customary and traditional use determination for caribou in Unit 13B.

### **Regulatory History**

The NCH is an important resource for many rural and non-rural users. Its proximity to the Glenn and Richardson highways enhances accessibility of the NCH to Anchorage and Fairbanks residents (Tobey 2003). A State Tier II system for NCH harvest was established in 1990 for Unit 13. A State Tier I permit was added for the 1996/97 and 1997/98 seasons to allow any Alaskan resident to harvest cows or young bulls to reduce the herd to the management objective of 35,000–40,000 caribou (ADF&G 1997). In 1998, the Tier I hunt was closed, as the herd was brought within management objectives due to increased harvest and lower calf recruitment.

In 1998, the Federal Subsistence Board (Board) adopted Proposal P98-036 to extend the winter caribou season from Jan. 5–Mar. 31 to Oct. 21–Mar. 31 (OSM 1998). This gave federally qualified subsistence users the same opportunity to harvest an animal as those hunting under State regulations.

In 2001, the Board adopted Proposal WP01-07, which changed the harvest limit from two caribou to two bulls by Federal registration permit only for all of Unit 13 (OSM 2001).

In 2002, the Board rejected Proposal WP02-17, which requested closure of Federal public lands in Units 13A and 13B to moose and caribou hunting by non-federally qualified users. The Board rejected this proposal consistent with the recommendations of the Southcentral Alaska Subsistence Regional Advisory Council (Southcentral Council), the Interagency Staff Committee, and the Alaska

Department of Fish and Game (ADF&G). All opposed this closure because closing Federal public lands in Units 13A and 13B to non-federally qualified users would not result in a conservation benefit due to the limited amount of Federal public land in Unit 13. The Board further reasoned that additional opportunities existed for Federal subsistence users to hunt on Federal public lands after the State closed its season, and because of the more liberal Federal harvest limit and longer season (OSM 2002).

In 2003, the Board adopted Proposal WP03-14, which changed the harvest limit for Units 13A and 13B back to two caribou, although only bulls could be harvested from Aug. 10–Sep. 30. For the Oct. 21–Mar. 31 winter season, the BLM's Glennallen Field Office Manager was delegated authority to determine the sex of animals to be taken in consultation with ADF&G and the Chairs of the Eastern Interior Alaska Subsistence Regional Advisory Council (Eastern Interior Council) and Southcentral Council. This authority was delegated to provide management flexibility to the in-season manager to offer a limited cow harvest during the winter hunt when population metrics warranted it. Enabling the in-season manager to make this determination allowed for a Federal priority while safeguarding the caribou population. For the remainder of Unit 13, the harvest limit remained two bulls for the Aug. 10–Sep. 30 and Oct. 21–Mar. 31 seasons (OSM 2003).

In 2005, the Board adopted modified Proposal WP05-08 via the consensus agenda. This proposal allowed the sex of caribou harvested to be determined for both the fall and winter seasons in Units 13A and 13B by the BLM Glennallen Field Office Manager in consultation with the ADF&G area biologist and Chairs of the Eastern Interior and Southcentral councils (OSM 2005). The adoption of this proposal allowed for the BLM to adaptively manage harvest of the NCH as population composition changed. When the population metrics supported cow harvest, the in-season manager could allow subsistence users to harvest cows, thereby enhancing a subsistence priority.

Emergency Order (EO) 02-01-07 closed the remainder of the 2006/07 State season for the NCH on February 4, 2007, due to high State hunter success in the State Tier II hunt. Likewise, EO 02-08-07 closed the 2007/08 Tier II hunt on September 20, 2007. The hunt was scheduled to re-open on October 21, 2007, but concerns about unreported harvest in the State and Federal hunts resulted in closure for the remainder of the season.

For the 2009/10 season, the State Tier II hunt was eliminated. Two hunts were added: a Tier I hunt and a Community Harvest hunt for residents of Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Copper Center. The harvest limit for each was one caribou (sex to be announced annually) with season dates of Aug. 10–Sep. 20 and Oct. 21–Mar. 31 and a harvest quota of 300 caribou, respectively. A federally qualified subsistence user could opt into the State community harvest system or use a State registration permit to harvest one caribou and then get a Federal permit to harvest an additional caribou within Unit 13 since the Federal harvest limit was two caribou. However, State regulations stipulate that Tier I and community harvest system permit holders may not hunt moose or caribou under State or Federal regulations outside of Unit 13 and the Copper Basin Community Hunt area, respectively (ADF&G 2019a).

In July 2010, the Alaska Superior Court found that elimination of the Tier II hunt was arbitrary and unreasonable (ADF&G 2010a). In response, the Alaska Board of Game (BOG) held an emergency teleconference in July 2010 and opened a Tier II hunt from Oct. 21–Mar. 31, maintained the existing Tier I season, and awarded up to 500 additional Tier I permits (ADF&G 2010a). Subsequently, EO 04-1-10 closed the remainder of the winter NCH Tier II season due to harvest reports indicating that approximately 1,404 bulls and 547 cows were harvested, and unreported harvest was expected to raise the total harvest above the harvest objective (ADF&G 2010b; OSM 2012).

In 2012, the Board adopted Proposal WP12-25, which added an additional nine days to the beginning of the fall caribou season in all of Unit 13 to provide more opportunity to federally qualified subsistence users. The season was extended from Aug. 10–Sep. 30 to Aug. 1–Sep. 30 (OSM 2012).

In 2016, Federal public lands in the Paxson Closed Area were determined to be open (i.e., no longer State selected) to the taking of big game, which includes caribou, by federally qualified subsistence users hunting under Federal subsistence regulations. The Board rejected Proposal WP16-16, which requested that Federal public lands within the Paxson Closed Area in Unit 13 be closed to federally qualified subsistence users (OSM 2016b).

Additionally in 2016, the Board adopted Proposal WP16-17, which rescinded the restriction prohibiting federally qualified subsistence users from hunting caribou within the Trans-Alaska Oil Pipeline right-of-way in Unit 13 (OSM 2016c).

In fall 2016, the Board approved Emergency Wildlife Special Action WSA16-05 to delegate authority to the BLM Glennallen Field Office Manager to open a ten-day caribou season between Oct. 1 and Oct. 20. WSA16-05 was approved to increase harvest of the NCH, which was above State management objectives, and to provide additional hunting opportunity for federally qualified subsistence users as fall harvest was low due to caribou being inaccessible during the regular hunting season because of delayed migration (OSM 2016a).

In 2018, Proposal WP18-19 was submitted by AITRC requesting they be allowed to distribute Federal registration permits to Ahtna tribal members for the Federal caribou season in Unit 13. In addition, the proponent requested that the Ahtna Advisory Committee (which was to be formed) be added to the list of agencies and organizations consulted by the BLM Glennallen Field Office Manager, when announcing the sex of caribou taken in Units 13A and 13B each year. The Board voted to defer WP18-19 pending development of a framework for a community harvest system (OSM 2018).

In 2018, ADF&G issued four EOs for the NCH in Unit 13. In response to high overwinter mortality, emigration to the Fortymile caribou herd (FCH), and lower than anticipated productivity, the NCH was reduced to approximately 35,700 caribou, which was near the lower end of the State's population management objective. EO 04-02-18 changed the State harvest limit from one caribou to one bull and the reporting requirement to three days. EO 04-04-18 closed the Tier 1 NCH hunt, RC561, on August 18, 2018, as reported harvest was approaching the harvest quota. EO 04-05-18 closed drawing hunt DC485 on August 26, 2018, to remain within the quota of 250 bulls set for that hunt. EO 04-07-18 closed the winter hunting seasons for all of these hunts.

In July 2019, the Board rejected Temporary Wildlife Special Action WSA19-03, which requested closure of Federal public lands in Unit 13 to caribou and moose hunting by non-federally qualified users for the 2019/20 season. The Board determined the requested closure was not warranted for conservation, continuation of subsistence uses, or safety reasons. The Board concluded that the closure was not necessary for the conservation of healthy caribou or moose populations in Unit 13, as these populations are routinely monitored, and annual biological data is used to inform management plans and to establish sustainable harvest guidelines. The closure was also not shown to be necessary to continue subsistence uses of those populations. Federally qualified subsistence users' annual harvest rates had remained consistent in comparison to the annual harvest rates by non-federally qualified users. Nevertheless, the Board recognized that local harvesters do experience an influx of non-local hunters, and many feel displaced by this activity and alter their subsistence activities as a result. In addition, the closure would not alleviate public safety concerns as non-federally qualified users would still be able to cross Federal public lands to access State and private lands.

In September 2019, ADF&G issued EO 04-09-19 to extend the closing date for all State caribou hunts in Unit 13 by ten days from September 20 to September 30. The EO was issued to reduce the size of the NCH population, which had grown to more than 53,000 animals, well above the upper end of the population objective for the herd.

In 2020, the Board adopted several proposals and special actions affecting caribou in Unit 13. First, in April the Board adopted deferred proposal WP18-19 with modification, establishing a community harvest system for moose and caribou in Unit 13. It also named eight individual communities within the Ahtna traditional use territory that are authorized to harvest caribou and moose in Unit 13 as part of the community harvest system, subject to a framework established by the Board under unit specific regulations.

In July 2020, the Board adopted two special actions with modification regarding caribou hunting in Unit 13, WSA20-01 and WSA20-03. WSA20-01 requested a continuous caribou season in Unit 13 from Aug. 1-Mar. 31 and that the harvest limit in Unit 13, remainder be changed from two bulls to two caribou for the 2020–2022 regulatory cycle. The Board approved the change in harvest limit to provide additional subsistence opportunity and because there were no conservation concerns. The Board did not approve the continuous season due to concern over harvesting bulls during rut when they may be unpalatable. This action was consistent with the Southcentral and Eastern Interior councils' recommendations.

WSA20-03 requested closure of Federal public lands in Unit 13 to the hunting of moose and caribou by non-federally qualified users for the 2020/21 season. The Board approved closure of Federal public lands in Units 13A and 13B only to moose and caribou hunting by non-federally qualified users for the 2020–2022 regulatory cycle. The Board supported the closure due to its necessity for reasons of public safety and continuation of subsistence uses. The Board limited the closure to Units 13A and 13B because this is the area where the most overcrowding, disruption of hunts, and serious safety concerns have occurred. The Board extended the special action to the 2021–2022 regulatory year as a regulatory

proposal would not become effective until July 1, 2022, and to reduce the administrative burden associated with processing additional requests.

Also in July 2020, the Board adopted Wildlife Special Action WSA20-02 with modification regarding the AITRC administered community harvest system. AITRC submitted WSA20-02 to effectively and immediately implement the community harvest system that the Board had approved in April 2020 (via adoption of deferred WP18-19). In January 2021, the Board approved the community harvest system framework, which was required to implement the system, as part of its adoption of WSA21-07. This special action addressed a regulatory inconsistency that prevented the community harvest system from being effectively implemented. In April 2022, the Board adopted Wildlife Proposal WP22-36, which codified these temporary regulations in the CFR.

In 2022, ADF&G issued four emergency orders (EOs) regarding caribou in Unit 13. A steep population decline and low recruitment due to a severe winter resulted in a population estimate below management objectives and therefore, a low harvest quota. On July 14, ADF&G established the resident caribou harvest limit in Unit 13 as one bull caribou and the harvestable surplus of 1,000 bulls as the quota with 615 bulls allocated to the State hunts (and the remaining 385 to the Federal hunts) to allow for growth of the herd via EO 04-02-22. In a corresponding press release, ADF&G outlined the distribution of the harvest quota across State hunts, including the youth hunt (70), non-resident hunt (0), resident drawing hunt (70), resident August registration hunt (140), resident September registration hunt (140), and community hunt (195).

BLM began printing and issuing Federal registration permits (FC1302) on July 7, 2022, which was seven days prior to the state releasing their harvest quotas through EO 04-02-22. The ADF&G area biologist in Unit 13 contacted the BLM Field office in Glennallen about July 19<sup>th</sup> to share the data of the recent NCH survey, the actions ADF&G were planning to implement due to the population decline, and to request that BLM recognize the need to take action for the conservation of the NCH by changing the harvest limit from two caribou, either sex, to 2 bull caribou (Rinaldi 2023, pers. comm.). Since BLM had already started issuing permits, ADF&G sent a letter asking for the change in harvest limit to the BLM State Director, elevating their concern above the Field Office level (**Appendix 2**). The BLM considered these requests but decided not to modify the harvest limit and responded to ADF&G with FSB letter OSM 22111.RLS (**Appendix 3**). More specifically, BLM did not restrict harvest to bulls only because: 1) Unit 13, remainder is already restricted to bull harvest; 2) the NCH is not present in Units 13A and 13B to any great extent and even then is not typically present on the Federal lands therein until late in the fall season; 3) the NCH often migrates through Federal lands when the season is closed to Federal hunting; and 4) harvest of cows by federally qualified subsistence users on Federal land has historically been minimal because hunters have been very receptive to ADF&G's population concerns and the BLM's outreach efforts to encourage the harvest of bulls only.

On August 16, 2022, State registration hunt RC561 was closed by EO 04-03-22 after the RC561 harvest quota was exceeded when 161 bull caribou were harvested in 8 days. On September 12, State registration hunt RC562 was closed by EO 04-06-22 after the RC562 harvest quota was exceeded

when 205 bull caribou were harvested in 13 days. In mid-October, all State winter hunts were closed by EO 04-08-22 before they opened because ADF&G determined no harvestable surplus was available and to promote NCH recovery. A total of 162 caribou, including 112 bulls and 50 cows, were harvested under Federal hunt FC1302 in 2022.

### **Current Events**

In 2023, all State and Federal hunts for Nelchina caribou were closed due to conservation concerns. On June 30, 2023, the State announced the closure of all NCH hunts for the 2023/24 season via EO R4-01-23. This EO closed the two Tier I registration hunts and the community subsistence hunt. The resident youth hunt and resident drawing hunt were not offered during the drawing application period of 2022 (ADF&G 2022), as ADF&G determined the NCH population was too low to offer these opportunities.

In July 2023, the Board approved WSA23-01/03 to close all caribou hunting during the fall season in Unit 13. WSA23-01 was submitted by ADF&G and WSA23-03 was submitted by the BLM. Both requests asked to close the fall hunts due to concerns over low population estimates by ADF&G.

In October 2023, the Board approved Wildlife Special Action WSA23-06, approved WSA23-04 with modification, and took no action on WSA23-02, closing winter Federal hunts on the NCH. Emergency Wildlife Special Action WSA23-06, submitted by ADF&G, requested closing the Federal winter caribou hunts in Units 11, 12, and 13 for the first 60 days of the 2023 winter season. This Emergency Special Action was submitted and approved ahead of a potential Federal government shutdown. Temporary Wildlife Special Action WSA23-02, submitted by ADF&G, requested closing the Federal winter caribou hunts in Units 12 and 13 for the 2023 regulatory year. WSA23-04, submitted by the BOG, requested closing the Federal winter caribou hunts within Units 11, 12, and 13 for the 2023 regulatory year. The modification on WSA23-04 was to provide an exception for traditional religious ceremonies and cultural/educational program permit harvest.

### **Biological Background**

The NCH calving grounds and summer range lie within Unit 13. The rut also generally occurs within Unit 13 from late September through mid-October. About 60-95% of the NCH overwinters in Unit 20E, although Nelchina caribou also overwinter in Unit 12 and across northern portions of Units 11 and 13 (Schwanke and Robbins 2013). Winter competition with the FCH in Unit 20E may be impacting the NCH and range conditions. While the calving season and location of the NCH calving grounds remains static, use of other seasonal ranges varies with resource availability and snow cover (Schwanke and Robbins 2013).

State management goals and harvest objectives are based on the principle of sustained yield (Robbins 2014). Since the 1990s, ADF&G has aimed to maintain a fall, post-hunt population of 35,000–40,000 caribou, with minimum ratios of 40 bulls:100 cows and 40 calves:100 cows (Hatcher and Robbins 2021). The goal is to provide for the harvest of 3,000–6,000 caribou annually.



The State manages the NCH for maximum sustained yield, principally by annual adjustments in harvest quotas. The population of the NCH has fluctuated over time, influenced primarily by harvest (Schwanke and Robbins 2013). Between 2003 and 2023, the NCH summer population estimate ranged from 8,823–53,500 caribou and averaged 37,453 caribou (**Table 1**). The herd has exceeded State population objectives many times, and harvest regulations have been liberalized to quickly reduce the population in an effort to preserve habitat conditions. Population increases in the NCH may be attributable to reduced predator numbers as a result of the Intensive Management program to benefit moose in Units 12, 13, and 20. (Schwanke and Robbins 2013; ADF&G 2017a, 2019a). The predator control program has been active in Unit 13 since 2000 (ADF&G 2023c). Activity under the program was suspended during 2012, 2015–2017, and 2019–2021, all coinciding with population estimates of the NCH at or above management objectives (ADF&G 20223c).

In October 2018, following a period of higher-than-expected population levels and associated liberalized harvest from 2010–2017, the NCH was estimated to be only 33,229, which is below the minimum State population objective (**Table 1**). A combination of a liberal hunt, severe winter conditions in the eastern part of their range that resulted in high over-winter mortality, emigration of some animals to the FCH, and lower than anticipated productivity reduced the NCH from the 2017 fall estimate of 41,411 (Rinaldi pers. comm. 2019). In the summer of 2019, the NCH population estimate peaked at 53,500 caribou (ADF&G 2019b). However, the NCH population estimate has declined precipitously since then to only 8,823 caribou in July 2023 (**Table 1**), which is the lowest estimate since 2003 (ADF&G 2023a, 2023b). Factors contributing to this recent decline include deep snow across the range of the NCH during the winter of 2021–2022 which led to increased adult mortality. Spring thaw was also late that year delaying green-up, migration, and calving, which led to low calf recruitment. Preliminary indicators suggest difficult winter conditions for 2022–2023, leading to poor recruitment again. Smaller cohorts over the last two years have the potential to slow population growth and recovery for the NCH (ADF&G 2023b).

Bull:cow and calf:cow ratios have also fluctuated greatly over time. Between 2003 and 2023, the bull:100 cow ratio ranged from 23–64 bulls:100 cows and averaged 41 bulls:100 cows. The composition survey results from July 2023 showed the lowest bull to cow ratio of 23:100 cow. The fall calf:100 cow ratio for the same timeframe ranged from 13–55 calves:100 cows and averaged 36 calves:100 cows (**Table 1**). Once again, the composition survey conducted in July 2023 resulted in the lowest observed calf:100 cow ratio of 13 calves:100 cow, indicating a low recruitment rate for 2023.

**Table 1.** Population estimates and composition metrics of the NCH (Tobey and Kelleyhouse 2007; ADF&G 2008, 2010a, 2018, 2019a, 2023a, 2023b; Schwanke 2011; Schwanke and Robbins 2013; Robbins 2015, 2016a, 2016b, 2017, pers. comm.; Rinaldi 2019, pers. comm; Hatcher 2021, pers. comm;). Fall herd estimates are derived from summer minimum count data combined with fall harvest and composition survey data.

Year	Total bulls:100 cows <sup>a</sup>	Calves:100 cows <sup>a</sup>	Summer Herd Estimates <sup>b</sup>	Fall Herd Estimates
2003	31	35	31,114	30,141
2004	31	45	38,961	36,677
2005	36	41	36,993	36,428
2006	23 <sup>c</sup>	40 <sup>c</sup>	-	-
2007	34	35	33,744	32,569
2008	39 <sup>c</sup>	40 <sup>c</sup>	-	33,288 <sup>c</sup>
2009	42	29	33,146	33,837
2010	64	55	44,954	48,653
2011	58	45	40,915	41,394
2012	57	31	46,496	50,646
2013	30	19	40,121	37,257
2014	42	45	-	-
2015	36	45	48,700	46,816
2016	57	48	46,673	46,673
2017	35 <sup>c</sup>	35 <sup>c</sup>	-	41,411 <sup>c</sup>
2018	40	20	35,703	33,229
2019	32	41	53,500	46,528
2020	28 <sup>c</sup>	17 <sup>c</sup>	-	35,000 <sup>c</sup>
2021	38	45	38,400	35,500
2022	26	16	21,000 <sup>c</sup>	17,433 <sup>c</sup>
2023	23	13	8,823	
Average	41	36	38,550	39,739

<sup>a</sup> Fall composition counts

<sup>b</sup> Summer photocensus

<sup>c</sup> Modeled estimate

## Cultural Knowledge and Traditional Practices

Units 13A and 13B fall within the traditional territory of the Ahtna Athabascans (ADF&G 2017b, de Laguna and McClellan 1981, Simeone 2006). Archaeological evidence and historical accounts indicate that caribou has been a primary subsistence resource for the Ahtna, who have hunted caribou seasonally in the spring and fall for generations (ADF&G 2017b; de Laguna and McClellan 1981; Simeone 2006). De Laguna (1981) reported that within Ahtna territory, caribou and moose were caught either in drag-pole snares or in snares set 200-300 feet apart in long brush fences. Caribou were also hunted with the use of spears from skin boats, and later, guns were used for both caribou and moose

hunting (de Laguna 1981; Reckord 1983). The traditional practices of drying and freezing meat, as well as the proper and respectful treatment of harvested resources such as caribou, are described in several ethnographic accounts of the Ahtna and people of the upper Tanana (de Laguna and McClellan 1981; Haynes and Simeone 2007; Reckord 1983; Simeone 2006).

Caribou continue to be vital resources for residents of the Copper River and Tanana watersheds (Holen et al. 2015; Holen et al. 2012; Kukkonen and Zimpleman 2012; La Vine, et al. 2013; La Vine and Zimpleman 2014). ADF&G's Division of Subsistence conducts household subsistence harvest surveys periodically throughout rural Alaska. Though this survey data is only available for some communities in some years, it is an important source for documenting patterns of resource use. In the most recent comprehensive subsistence surveys conducted in the region by ADF&G between 2009 and 2013, large land mammal harvest accounted for 17% to 60% of communities' total subsistence harvests by weight (Holen et al. 2015; Holen et al. 2012; Kukkonen and Zimpleman 2012; La Vine, et al. 2013; La Vine and Zimpleman 2014). While bear, sheep, goat, and bison were also taken, most of the large land mammal harvest was composed of caribou and moose for all communities surveyed (Holen, et al. 2012; Kukkonen and Zimpleman 2012; La Vine, et al. 2013; La Vine and Zimpleman 2014). Surveys reported the per capita large land mammal harvest from communities in the Copper River Basin ranged from approximately 11 pound per person in Mendeltna to 121 pound per person in Mentasta Pass (La Vine et al. 2013). In some communities in the region, large land mammal harvests surpassed those of fish (Holen et al. 2015; Holen et al. 2012; Kukkonen and Zimpleman 2012; La Vine, et al. 2013; La Vine and Zimpleman 2014).

During each study year, communities within the Copper River Basin harvested or hunted for caribou in Units 13, as well as in nearby Units 11 and 12 (Holen et al. 2015; Kukkonen et al. 2012; La Vine et al. 2013; La Vine & Zimpleman 2014). Harvest and search areas specific to communities within Unit 13 illustrate a pattern of hunting along nearby road corridors and locations close to home (Holen et al. 2015; Kukkonen et al. 2012; La Vine et al. 2013; La Vine & Zimpleman 2014). Some communities described hunting primarily along road corridors, while others noted that their caribou harvest and search areas extended throughout the basin (Holen et al. 2015; Kukkonen et al. 2012; La Vine et al. 2013; La Vine & Zimpleman 2014). **Table 2** shows the caribou hunt permits received by residents of communities that have reported hunting in Units 13A and 13B under the FC1302 permit between 2017 and 2021. These residents and communities would be directly affected by this proposal. Significantly, even in communities that reported no harvest for their study year, caribou were still widely used, shared, and received (Holen et al. 2015). For example, while Tolsona reported no caribou harvest during the 2013 study year, 25% of Tolsona households still reported using caribou (Holen et al. 2015).

Household subsistence surveys conducted between 2009 and 2013 also documented local concerns about issues of user conflict regarding access to, and competition for, key subsistence resources (Holen et al. 2012, Holen et al. 2015). Many communities in the region had concerns about the number of caribou and other large land mammal harvest taken by non-local hunters (Holen et al. 2012, Holen et al. 2015). Some residents argued that most of the meat harvested in Unit 13 is not eaten by residents of the region (Holen et al. 2012, Holen et al. 2015). Others added that non-local hunters were out-competing locals and driving game away (Holen et al. 2012). Many communities surveyed from 2009

to 2013 noted that better-equipped urban hunters, traffic pressure on the roads, and significant increases in the use of off-road vehicles were decreasing the success rates and efficiency of federally qualified subsistence users by interfering with access to favored hunting areas and driving game further from road corridors (Holen et al. 2012, Holen et al. 2015).

Some local community members have also noted that changing climatic conditions are complicating more traditional large land mammal hunting practices in the area, as warmer weather is extending longer into the hunting season and altering the timing of yearly biological cycles and herd migrations, in ways that make it harder to hunt successfully under the current rules and regulations on caribou hunting in this area (Holen et al. 2012; Holen et al. 2015; Kukkonen and Zimpleman 2012; La Vine et al. 2013; La Vine and Zimpleman 2014). Providing the BLM Glenallen Field Office Manager with Delegation of Authority to adjust season dates and harvest limits should help to address this issue, by allowing for more flexible, time-sensitive in-season management actions.

**Table 2.** Reported hunt data for selected communities with a customary and traditional use determination for caribou in Units 13A and/or 13B that have utilized the FC1302 permit in one of the two subunits between 2017 and 2021 (OSM 2023, ADLWD 2022). <sup>a</sup>

Community	Estimated Community Population	Number of FC1302 Permits Hunted in 13A or 13B
Delta Junction	983	1435
Copper Center	316	467
Glennallen	427	402
Tazlina	257	174
Gakona	181	148
Kenny Lake	294	101
Chickaloon	246	74
Glacier View	251	60
Chitina	97	29
Silver Springs	105	29
Tolsona	12	27
Sheep Mountain	--	22
Tangle Lakes	--	20
Nelchina	46	19
Slana	93	19
Copperville	--	18
Lake Louise	40	14
Tonsina	51	13
Cantwell	196	11
Paxson	26	11
Gulkana	89	10
Sourdough	--	10
Meiers Lake	--	8
McCarthy	114	6

<sup>a</sup> Communities or areas with fewer than 5 hunts reported during this time are not included. This is not an exhaustive list of communities or areas qualified to hunt under the FC1302 permit in 13A and 13B.

## Harvest History

The NCH is a popular herd to hunt and experiences heavy harvest pressure due to its road accessibility and proximity to Fairbanks and Anchorage. Harvest quotas are adjusted annually to achieve State management objectives and keep the herd from growing to unsustainable levels (Schwanke and Robbins 2013). In recent years, caribou have been largely unavailable on Federal public lands during the fall Federal season (Aug. 1– Sep. 30) with their presence peaking during October when the season is closed for the rut (BLM 2020, OSM 2023b).

Over 95% of total NCH harvest occurs in Unit 13. Between 2001 and 2022, harvest from the NCH under State regulations ranged from 519–5,785 caribou/year (**Table 3**). Over the same period, caribou harvest under Federal regulations in Unit 13 ranged from 102–610 caribou/year (**Table 3**). No Federal or State harvest occurred during 2023 because the hunts were closed due to conservation concerns. Federal harvest (FC1302) accounts for 14% of the total Unit 13 caribou harvest on average. Fluctuations in Unit 13 caribou harvest follows changes in abundance and population estimations.

Federal FC1302 permits issued from 2019–2022 averaged 2,746, which is comparable to the overall average since 2001 of 2,762 (**Table 4**). The 2022/23 reported Federal harvest of 166 caribou was much lower than the long term 2001–2022 average of 371 (OSM 2023b). The lower 2022 Federal subsistence harvest may be because of lower abundance of caribou or because they migrated through Federal public lands during October when the season was closed.

Between 2001 and 2022, the number of Federal subsistence hunters and harvest success rates for the FC1302 hunt have shown substantial annual variation (**Table 4**). Between 2003 and 2012, Federal subsistence hunter numbers and success rates averaged 1,353 hunters and 31%, respectively. Between 2013 and 2022, Federal subsistence hunter numbers and success rates averaged 1,219 hunters and 25%, respectively (OSM 2023b). Success rates for caribou harvest depend largely on caribou availability (a function of migration timing) rather than abundance, and availability likely explains some of the substantial annual variation. Of note, federally qualified subsistence users may also harvest under State regulations, and those harvests are not reflected in the data above or in **Table 4**. The data described above and in **Table 4** only considers harvests under Federal regulations (FC1302).

**Table 3.** Total harvest of Nelchina caribou in Unit 13. Showing State harvest quota, State harvest, and Federal harvest (Tobey and Kelleyhouse 2007; Schwanke and Robbins 2013; Robbins 2015, 2017, pers. comm.; WinfoNet 2019; BLM 2020; OSM 2023b).

Regulatory Year	Harvest Quota	State Harvest	Federal Harvest (FC1302)	Total Unit 13 Harvest
2001		1,479	498	1,977
2002		1,315	337	1,652
2003		995	322	1,317
2004		1,226	335	1,561
2005		2,772	610	3,382
2006		3,043	570	3,613
2007		1,314	385	1,699
2008		1,315	273	1,588
2009		753	349	1,102
2010	2,300	1,899	451	2,350
2011	2,400	2,032	395	2,427
2012	5,500	3,718	537	4,255
2013	2,500	2,303	279	2,582
2014	3,000	2,712	237	2,949
2015	5,000	3,402	595	3,997
2016	N/A <sup>a</sup>	5,785	491	6,276
2017	6,000	4,529	358	4,887
2018	1,400	1,411	370	1,781
2019	3,450	2,735	102	2,837
2020	5,090	3,770	306	4,076
2021	1,250	1,505	220	1,725
2022	615	519	166	685
2023	0	0		

<sup>a</sup> Original quota of 4,000 caribou was lifted and no adjusted quota was announced.



**Table 4.** The number of permits issued, permits used, and caribou harvested under permit FC1302 Federal caribou hunt in Unit 13 (OSM 2023b).

Regulatory Year	Permits Issued	Hunted	Harvested Male	Harvested Female	Harvested Unknown Sex	Total Harvested
2001	2,565	1,469	489	3	6	498
2002	2,507	1,379	323	2	12	337
2003	2,574	1,240	317	2	3	322
2004	2,555	1,337	248	85	2	335
2005	2,557	1,499	365	238	7	610
2006	2,631	1,317	318	238	14	570
2007	2,399	1,092	259	120	6	385
2008	2,532	1,229	180	89	4	273
2009	2,576	1,339	342	7	0	349
2010	2,852	1,535	316	129	6	451
2011	2,980	1,425	281	113	1	395
2012	2,953	1,518	326	203	8	537
2013	2,781	1,303	210	68	1	279
2014	2,943	1,395	177	59	1	237
2015	3,061	1,560	444	147	4	595
2016	3,151	1,530	299	192	0	491
2017	3,071	1,526	208	148	2	358
2018	3,082	1,433	232	135	3	370
2019	2,785	898	80	21	1	102
2020	2,915	1,194	193	112	1	306
2021	2,606	945	149	71	0	220
2022	2,676	1,015	115	51	0	166

### Alternative Considered

One alternative suggested by agency staff was to delegate authority for all of Unit 13 rather than just for 13A and 13B. Delegating the authority for in-season management of caribou in only a portion of Unit 13 has the potential to create confusion regarding seasons and harvest limits in Unit 13 remainder, especially given that a single caribou permit applies to all subunits of Unit 13. The harvest limit in 13A and 13B could potentially be reduced to one caribou but would remain two-bulls in the remainder of the unit; or the season could be extended or shortened in 13A and 13B, but not in the remainder of the unit.

Reducing the harvest limit in Units 13A and 13B, while retaining the two bulls limit in Unit 13 remainder could send a message that there is not a conservation concern there and result in increased hunting pressure in 13C, 13D, and 13E. If authority was delegated to the BLM for all of Unit 13, all seasons could be adjusted to account for shifting harvest patterns and in response to herd status.

This alternative was not further considered because the proponent did not specifically request this delegation. Harvest records do not indicate this need either. Since 2016, 72% of Federal caribou harvest has been from Units 13A and 13B. The NCH typically does not occur in Unit 13D and the rest of Federal land within Unit 13 remainder is not as easily accessed as Units 13A and 13B.

### **Effects of the Proposal**

If this proposal is adopted, the BLM Glenallen Field Office manager will be delegated authority to close and reopen seasons, adjust season dates, set harvest limits including any needed sex restrictions, and set any needed permit conditions for caribou in Units 13A and 13B via delegation of authority letter only (**Appendix 1**). The delegation would include the authority to close and reopen Federal public lands in subunits 13A and 13B to non-subsistence hunting but does not authorize changes to permit requirements or harvest and possession limits for State-managed hunts. Consultation with AITRC, in addition to the usual State and Federal agencies and Regional Advisory Councils, would be required before any in-season management actions occur. The caribou harvest limit in Units 13A and 13B would change from “2 caribou” to “up to 2 caribou.”

Expanding the authority delegated to the in-season manager provides management flexibility to respond to changing herd population metrics and hunt conditions in a timely manner. Currently, in-season management actions such as closing seasons during times of conservation concern require submission of a special action request, a full analysis process and Board action, which can take months. Delegating authority will allow for quick, in-season management actions to protect the NCH population from possible overharvest or to allow additional subsistence harvest opportunity as conditions allow. Removing the Delegated Authority from unit-specific regulations will simplify Federal regulations, while a Delegation of Authority Letter provides more explicit and detailed explanations of the requirements and process needed to enact in-season management actions. The addition of AITRC to the consultation process ensures that an important group of subsistence users relying on the NCH are incorporated into the decision-making process.

Changing the harvest limit in Units 13A and 13B from “2 caribou” to “up to 2 caribou” will allow the in-season manager to respond to changing population metrics and better manage harvest to optimize herd conservation and Federal subsistence hunting opportunity. For example, during times of population decline and conservation concern, the ability to restrict the harvest limit to only one caribou or one bull could help protect the NCH from further declines, while still allowing some harvest opportunity for federally qualified subsistence users.

## OSM CONCLUSION

**Support** Proposal WP24-09.

### Justification

Delegating authority to manage the NCH hunt provides management flexibility to quickly respond to changing herd and hunt conditions, optimizing conservation and subsistence opportunity. Approving WP24-09 will allow for quick in-season management decisions to be made for protection of the NCH when a conservation concern arises in Units 13A and 13B. Incorporation of AITRC into the consultation process with the BLM will allow an important group of federally qualified subsistence users who rely upon the NCH to be incorporated into management decisions regarding the NCH. Similarly, changing the harvest limit to ‘up to 2 caribou’ balances conservation and subsistence opportunity.

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## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

### Southcentral Alaska Subsistence Regional Advisory Council

**Support** WP24-09 **with modification** to sunset the delegated authority after four years. The Council voted to modify the proposal by specifying that the delegated authority will sunset after four years. The Council supported this proposal with modification as it allows for more timely decisions to be made and included AITRC in the delegated list of entities that would be consulted. The Council's modification allows four seasons to review whether the delegation of authority is still warranted.

**Note:** This modification would be reflected in the 'Effective Period' of the Delegation of Authority Letter (see **4.** in **Appendix 1**). It could also be noted in the Delegation of Authority table in the back of the Federal regulations booklet.

## INTERAGENCY STAFF COMMITTEE COMMENTS

The expanded delegated authority being requested by the Bureau of Land Management in Units 13A and 13B would allow for quicker and more responsive management of the Nelchina Caribou Herd (NCH). Recent conservation concerns have highlighted the need to respond quickly to rapidly changing biological metrics of the NCH. Including the Ahtna Intertribal Resource Commission in the management process will ensure that perspectives and concerns of local rural users are taken into consideration.

The modification suggested by the Southcentral Alaska Subsistence Regional Advisory Council would allow this requested delegation to sunset after four years. However, because delegations of authority are administrative in nature, the Board could choose to reauthorize this delegation after the four-year time period without having to go through the regulatory and public review process. Therefore, any requested sunset period would be made moot by such Board action. Delegations of authority should be viewed as a means to allow for long term and responsive management of wildlife resources on the landscape. Allowing for a sunset of this management tool might not be in the best interests of the resource. Further, before any delegated authority is initiated, the Federal manager is required to coordinate with the Southcentral and Eastern Interior Alaska Subsistence Regional Advisory Council Chairs and the Alaska Department of Fish and Game prior to implementation of any management action affecting the NCH.



## ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

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### Alaska Department of Fish and Game Comments

#### **Wildlife Proposal WP24-09**

This proposal would replace the current delegated authority in the Game Management Unit (Unit) 13A and 13B unit-specific regulations for caribou and establish a Delegation of Authority Letter, expanding the Scope of the Delegation authorized to the Glennallen Field Office Manager of the Bureau of Land Management (BLM). Additionally, this proposal would change the harvest limit for caribou from “2 caribou” to “up to 2 caribou.”

#### **Position**

The Alaska Department of Fish & Game (ADF&G) **SUPPORTS** this proposal. Responsible wildlife management, especially caribou management, necessitates the ability to make changes to seasons and bag limits or establish quotas on short notice ahead of the season when updated population data becomes available in spring and summer. A hunt without the flexibility for adaptive management should not be offered, but intimate knowledge of the resource, population and harvest data, and wildlife management expertise are required to effectively make management decisions and administer hunts. The proposal specifies that the Ahtna Intertribal Resources Commission be added as a party to be consulted/notified but does not explicitly define the other parties that will be included for consultation in the Delegation of Authority Letter. Furthermore, previous recommendations from ADF&G that were within the current Scope of Delegation were not followed after the initial recent decline of the Nelchina caribou herd was documented.

#### **Background**

Caribou populations are dynamic and adaptive management strategies are necessary for effective and responsible management. This includes the ability to make in-season management decisions and pre-season changes to season dates and bag limits on short notice when updated population information becomes available in spring and summer. The Nelchina caribou herd has embodied a wildlife management experiment since the early 1990s, with the goal of minimizing boom-and-bust cycles by maintaining the herd well-below carrying capacity to provide more consistent harvest opportunity over time. This strategy was successful throughout the greater history of the federal subsistence hunt opportunity that has been available within Unit 13, administered by the BLM. As such, the BLM has not had significant need to limit hunt opportunity or make hunt management decisions such as changing season dates, bag limits, or establishing quotas. The BLM traditionally issues as many permits for two caribou as there are qualified applicants, and in times of reduced harvestable surplus ADF&G has accounted for this by removing the long-term average of federal harvest from the available surplus for the upcoming season and dividing the remaining surplus into quotas for the already permitted state hunts existing that year. Now that the Nelchina caribou herd has experienced a precipitous decline, there will be a significantly reduced harvestable surplus during the upcoming period of herd recovery. In some years there will not be sufficient harvestable surplus to allow federally qualified users (FQU) to harvest two caribou or even two bulls for the full season dates that are currently in regulation. Responsible

Draft Comments on WP24-xx  
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management necessitates the ability for hunt managers to reduce bag limits and season dates in situations such as these.

#### **Impact on Subsistence Users**

If adopted FQUs will be impacted in years when harvestable surplus of caribou is very low to protect the resource and allow the herd to recover. This is necessary for the long-term health of the herd as well as the perpetual viability of subsistence hunting opportunity. Users may need to rely more heavily on other local subsistence resources while the herd recovers.

#### **Impact on Other Users**

If adopted there will be no foreseen impact on other users, except that state subsistence hunting opportunities may be more reliably offered if a mechanism of pr federal subsistence harvest is implemented (such as hunt quotas).

#### **Opportunity Provided by State**

**State customary and traditional use findings:** The Alaska Board of Game (BOG) has made positive customary and traditional use findings for Nelchina caribou in Units 12 and 13.

**Amounts Reasonably Necessary for Subsistence:** Alaska state law requires the Board of Game to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for Nelchina caribou in Units 12 and 13 is 600–1,000 animals.

#### **Conservation Issues**

The Nelchina caribou herd has experienced a decline similar to that observed in the early 1970s. There was a roughly 15-year recovery period following that decline. To facilitate herd recovery, and ideally reduce such a protracted recovery period, it is imperative that we minimize harvest of cow caribou and protect the reproductive capacity of the herd. It will also be necessary in some years to limit bull harvest to maintain healthy bull-to-cow ratios. These management strategies are necessary for conservation of the Nelchina caribou herd.

#### **Enforcement Issues**

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Federally qualified users should be expected to know how to accurately identify bull versus cow caribou and make informed, ethical decisions and harvests. There has been concern expressed that accidental harvest of cows during a bull-only hunt may “criminalize” the subsistence user, and/or hunters may choose to leave these animals to waste in the field rather than report harvesting a cow. Enforcement will be necessary, but enforcement personnel already patrol this hunt. The BLM may consider administration of a meat-receival list, so that cows that are mistakenly harvested may be turned-in to the BLM and provided to the next person on the list, rather than left to rot in the field, as consequences for “self-turn-in” and proper salvage of the animal may result in reduced consequences and reduced “criminalization” of the users.

## WRITTEN PUBLIC COMMENTS



## Ahtna Intertribal Resource Commission

VIC Box 432 • Chitina, Alaska 99589  
Phone: (907) 822-4466 Fax: (907) 822-4466

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Resource Commission, Inc.

June 30, 2023

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

Submitted to: [substance@fw.gov](mailto:substance@fw.gov)

Re: Written comments on WP24-09 and Federal Wildlife Closure Reviews WCR24-35 and WCR 24-42

Dear Chairman Anthony Christianson:

The Ahtna Intertribal Resource Commission (AITRC) serves the eight Federally recognized Tribal governments and the two Alaska Native Corporations within the Ahtna Territory, including portions of Game Management Units 11, 12, and 13.

### **WP24-09 Nelchina Caribou Herd Delegation of Authority Changes and Changes in Harvest Limit**

AITRC supports Wildlife Proposal 24-09 submitted by the Bureau of Land Management's Glennallen Field Office. This proposal would (1) relocate the current delegated authority found in unit-specific caribou hunting regulations to the Delegation of Authority Letter, (2) expand the Scope of Glennallen Field Office Manager's Delegated Authority, and (3) revise the harvest limit from "2 caribou" to "up to 2 caribou," given the ongoing conservation concerns associated with the Nelchina Caribou Herd.

Relocating the delegation authority language from harvest regulations to the Delegation Letter seems to be a matter of housekeeping and consistency, which AITRC supports. We also support AITRC being specifically listed in the Delegation of Authority Letter to further advance the cooperative federal management partnership between AITRC and the US Department of the Interior in 2016.

AITRC agrees with the proponent of WP24-09 that the scope of the Federal In-Season Manager should be expanded to including closing, opening, and adjusting season dates, as well as setting harvest limits, including any sex restrictions or to set any needed permit condition. These are important management tools that the BLM Field Office Manager should have available to

Doc ID:

respond to fluctuating Nelchina Caribou Herd population dynamics and any potential conservation crisis. Existing authorities found in the harvest regulations are inadequate to support responsible conservation management and to ensure the continuation of Federal subsistence uses when possible, during periods of conservation concern.

AITRC also supports, albeit reluctantly, the requested revision of the harvest limits for Nelchina caribou from 2 caribou to "up to 2 caribou" for times of conservation concern given the reconnection that the population status may not support a bag limit of two animals and that in order to continue Federal subsistence uses, it may be necessary to limit the harvest limit to one bull caribou until such time that the herd's population is rebuilt to be within management objective.

#### **Chisana Caribou Herd Wildlife Closure Review WCR24-35**

Federal public lands are closed to the harvest of Chisana caribou except by Federally qualified subsistence users. Presently, the hunting of Chisana caribou is limited to the Federally qualified rural residents of Unit 12, Chistochina, Dot Lake, Healy Lake, and Mentasta Lake.

AITRC supports the continuation of the closure of caribou hunting of the Chisana Caribou Herd to all but federally qualified subsistence users. Given the small size of the Chisana caribou population and the negative customary and traditional use determination established by the Alaska Board of Game, it would be detrimental to Federal subsistence uses to open up caribou hunting to sport and recreational hunters at this time.

#### **Mentasta Caribou Herd Wildlife Closure Review WCR24-42**

All hunting of the Mentasta Caribou Herd is prohibited on Federal public lands. However, in 2022, the Federal Subsistence Board approved WP22-35, as amended, which established a may be announced Federal subsistence hunt in Game Management Unit 11 for bull caribou when Nelchina caribou are present in sufficient abundance to warrant an opportunity. While the present population status of the Nelchina Caribou Herd may be insufficient to support a limited federal subsistence hunt within the range of the Mentasta Caribou Herd at this time, AITRC supports a revision of the current Wildlife Closure of caribou hunting in Unit 11 to allow for this newly established "May be announced" hunt.

Sincerely,

  
Karen Linnell  
Executive Director AITRC

## Appendix 1

Glennallen Field Office Manager  
Bureau of Land Management  
PO Box 147  
Glennallen, Alaska 99588

Dear Field Office Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the manager of the Bureau of Land Management (BLM) Glennallen Field Office (GFO) to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of a wildlife population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Units 13A and 13B for the management of caribou on these lands.

It is the intent of the Board that actions related to management of caribou by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), representatives of the Office of Subsistence Management (OSM), **the Ahtna Intertribal Resource Commission**, and the Chair of the affected Council(s) to the extent possible. The Office of Subsistence Management will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

### DELEGATION OF AUTHORITY

**1. Delegation:** The Glennallen Field Office Manager is hereby delegated authority to issue emergency or temporary special actions affecting caribou on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

**2. Authority:** This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: “The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board.”

**3. Scope of Delegation:** The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

- **To close, reopen, and adjust season dates**

- **To set harvest limits, including sex restrictions**
- **To set any needed permit conditions**

This delegation also permits you to close and reopen Federal public lands to nonsubsistence hunting but does not permit you to specify permit requirements or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve caribou populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations, shall be directed to the Board.

The Federal public lands subject to this delegated authority are those within Units 13A and 13B.

**4. Effective Period:** This delegation of authority is effective from the date of this letter and continues until superseded or rescinded. (*Southcentral Council modification: **continues until June 30, 2028***).

**5. Guidelines for Delegation:** You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 50 CFR 100.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected Federally qualified subsistence users and non-Federally qualified users. Requests not within your delegated authority will be forwarded to the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Government-to-Government Tribal Consultation Policy (Federal Subsistence Board Government-to-Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).



You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

**6. Support Services:** Administrative support for regulatory actions will be provided by the Office of Subsistence Management.

Sincerely,

Anthony Christianson  
Chair

Enclosures

cc: Federal Subsistence Board  
Office of Subsistence Management  
**Chair, Southcentral Interior Alaska Subsistence Regional Advisory Council**  
**Chair, Eastern Interior Alaska Subsistence Regional Advisory Council**  
**Executive Director, Ahtna Intertribal Resource Commission**  
Deputy Commissioner, Alaska Department of Fish and Game  
Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record

## Appendix 2



July 25, 2022

Steve Cohn, State Director  
Bureau of Land Management - Alaska  
222 W. 7<sup>th</sup> Ave., #13  
Anchorage, AK 99513

Director Cohn:

I am writing to elevate the concerns the Alaska Department of Fish & Game (ADF&G) have regarding the management of the federal hunts of the Nelchina Caribou Herd (NCH) and the lack of a response from the Bureau of Land Management's (BLM) Glenallen Field Office.

As you may be aware, ADF&G does not announce the harvest strategy for the NCH until area biologists are able to conduct the annual population survey in early July. Once we have that survey data, we conduct our analysis and then make an announcement for hunt quotas and bag limits. In recent years the size of the NCH has been above objectives, affording extra harvest opportunity to reduce the herd to within population objectives. This year, severe winter conditions and late spring thaw resulted in higher-than-normal adult mortality and low recruitment of calves into the population. Spring migration and calving occurred late, and a small portion of the herd did not return from the wintering grounds. Furthermore, production and survival of this spring's calf crop is low. These factors combine to reduce the NCH to an estimated 21,000 caribou. As a result, available harvest is lower than in recent years, as the goal is now focused on growing the herd. The fall quotas and expected harvest reflect the Alaska Board of Game's direction to distribute hunter opportunity and harvest for this important caribou herd.

Given these factors and the response we took to conserve the NCH (one bull bag limit) the area biologist reached out to your field office in Glenallen to share the data of the recent survey, the actions we are taking in light of the population decline and to request that BLM to recognize the need to take action for the conservation of the NCH and change the bag limit from two caribou, either sex, to 2 bull caribou. The response was surprising saying that they do not feel that federally qualified users (FQU) harvest enough of the caribou population to have a "significant

Steve Cohn

2

July 25, 2012

biological effect." The quota set for the 2022 fall season under State regulations is 615 bull caribou, many of which will be taken by EQu's. In addition to that harvest, it is anticipated based off of a 10-year average that they will also take up to 400 animals. This could represent up to 40% of the total harvest of just the fall hunt. This does not include the additional harvest that may be authorized under federal permits for the winter hunt. ADF&G anticipates that the harvest objectives will be met this fall and no winter hunt will be announced.

Regardless of your staff's response to our request, this should not have been the first time they spoke on the management strategy for the NCH. Under ANILCA Title 8 as well as your own federal regulations it requires the BLM Glennallen Field Office Manager to consult with the ADF&G area biologist on the announcement of the sex of animals that may be taken in the federal NCH hunt. I've reached out to the area biologist charged with the monitoring and management of the NCH and no such outreach and consultation occurred until she reached out to your staff. Given the popularity of this herd and how actively managed it is, it is imperative that a high level of communication occur.

The Department requests that BLM reconsider the Nelchina caribou federal hunting season bag limit and change it to two bull caribou in recognition of the need to protect females and grow the herd. I look forward to hearing from you on how we can reinvigorate the relationship between our two agencies on the management of this important caribou herd to all the people of Alaska.

Sincerely,



Ben Mulligan  
Deputy Commissioner

CC: Anthony Christianson, Chair, Federal Subsistence Board  
 Drandon Brafczynski, Deputy Chief-of-Staff, Office of the Governor  
 Doug Vincent-Lang, Commissioner, ADF&G  
 Eddie Gramer, Director, Division of Wildlife Conservation, ADF&G  
 Ryan Scott, Assistant Director, Division of Wildlife Conservation, ADF&G  
 Gino DelPrate, Regional Supervisor, Division of Wildlife Conservation, ADF&G  
 Mark Burch, Special Projects Coordinator, Division of Wildlife Conservation, ADF&G

## Appendix 3



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

## Federal Subsistence Board

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



FOREST SERVICE

SEPT 30 2022

In Reply Refer To:  
OSM 22111.RLS

Benjamin Mulligan  
Deputy Commissioner  
Alaska Department of Fish and Game  
333 Raspberry Road  
Anchorage, AK 99518-1509

Dear Deputy Commissioner Mulligan:

This letter is written in response to your letter dated July 25<sup>th</sup>, 2022, regarding concerns expressed by the Alaska Department of Fish and Game (ADF&G) about management of the Nelchina Caribou Herd (NCH) by the Bureau of Land Management's (BLM) Glennallen Field Office.

The BLM Glennallen Field Office Manager has been delegated authority by the Federal Subsistence Board (Board) to determine the sex of animals to be taken for the Federal (FC) 1302 caribou hunt in Units 13A and 13B. In this role, the BLM Field Office Manager carefully considers requests by ADF&G and considers consultation with the Eastern Interior Alaska and Southcentral Alaska Subsistence Regional Advisory Council Chairs, federally recognized tribes, and with the ADF&G Area Biologist.

The Office of Subsistence Management has conferred with the BLM Field Office Manager and confirmed that she will continue to monitor Federal subsistence harvest and the NCH migration in consultation with the ADF&G Area Biologist and encourage the harvest of bull caribou. However, it is not the federal program's intention to mandate a bulls-only harvest through regulation at this time. The rationale for this approach is that Unit 13 remainder is already restricted to bull harvest; the NCH is not present in Units 13A and 13B to any great extent and typically are not present on the Federal lands therein until late in the fall season, and the NCH often migrates through Federal lands when the season is closed to Federal hunting. An additional consideration is that the harvest of cows by Federally qualified subsistence users on Federal land has been minimal because hunters have been very receptive to ADF&G's population concerns and the BLM's outreach efforts to encourage the harvest of bulls only. A review of the Federal subsistence harvest database on September 23, 2022, revealed that only six caribou have been harvested under the (FC) 1302 Federal registration permit to date, only one of which was a cow.

Federally qualified subsistence users also participate in the State hunt for the NCH and are subject to the quota set by the State for the 2022 hunt. The announced State quota of 1,000 bull caribou does include the expected harvest of approximately 400 caribou under Federal subsistence regulations from this quota. Given the limited amount of Federal public lands in Units 13A and 13B and the low level of cow harvest under Federal regulations for the fall hunt, the Board does not anticipate that future harvest during the fall subsistence hunt requires the BLM Field Office Manager to exercise her delegated authority to require the harvest of bulls only. However, she will consider changing the Federal hunt to bulls only for the winter hunt as the winter season opening date approaches and after further consultation with the ADF&G Area Biologist.

The BLM Field Office Manager and the Board appreciate and value our working relationships with ADF&G and we look forward to improving and expanding upon this relationship and outreach efforts regarding management of the NCH.

Sincerely,



Anthony Christianson  
Chair

cc:

Doug Vincent-Lang, Commissioner, ADF&G  
Federal Subsistence Board  
Interagency Staff Committee  
Office of Subsistence Management  
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management  
Marnie Graham, BLM Glennallen Field Office Manager  
Ken Lord, Assistant Regional Solicitor, Office of the Solicitor, Alaska Region

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