

INTERAGENCY STAFF COMMITTEE RECOMMENDATION

Oppose WSA25-01/03

The Southeast Alaska Subsistence Regional Advisory Council (Council) submitted three special action requests in anticipation of a possible increase in harvest pressure if or when Ketchikan is designated as a rural community. Once rural, Ketchikan hunters would be able to harvest under more liberal Federal subsistence hunting regulations. The Council expressed concern that this scenario could increase competition for deer on Prince of Wales Island (POW), result in fewer deer being available for harvest by the much smaller POW communities, and reduce the Sitka black-tailed deer population to levels triggering long-term conservation concerns. The Office of Subsistence Management (OSM) analyzed WSA25-01 and WSA25-03 together because restrictions to Non-Federally Qualified Users (NFQU) are often considered before limiting Federally Qualified Subsistence Users (FQSU) through the Section 804 prioritization process.

The Interagency Staff Committee (ISC) acknowledges the concerns and uncertainty that this change in Ketchikan's status brings, shared by both the Council and the smaller communities of POW. However, the impacts of this change are not yet known, and existing data do not support such measures as closures or prioritization at this time. Although it is widely believed by biologists, managers, and FQSU from POW that the local deer population has been declining in recent years, data show that subsistence users have continued to harvest deer at comparable levels and that the overall harvest has not decreased substantially. This indicates that the POW deer population is managed successfully under current regulations.

Ketchikan hunters have always been eligible to hunt on POW under State regulations, yet they have averaged less than one deer per hunter from Ketchikan. Thus, it seems unlikely that there will be a significant increase in harvest, even under the more liberal limits for FQSUs (NDP 25-01 at p. 43, Table 12). In addition, State and Federal managers maintain liberal annual harvest limits - 4 bucks per person under State regulations, and 5 deer per person under Federal regulations - demonstrating a lack of imminent conservation concern. Finally, NFQU are already restricted to a 2-buck bag limit on Federal public lands in GMU 2 by the Federal Subsistence Board (Board) and their efforts make up a small proportion of the overall harvest. For the aforementioned reasons, the ISC does not recommend closing deer hunting to NFQUs on POW at this time.

A Section 804 prioritization may be conducted to protect the continuing viability of a fish or wildlife population or to continue subsistence uses of such populations, typically when there is a shortage of subsistence resources. As noted above, hunter effort and harvest data do not warrant a closure to NFQUs for conservation concerns, nor for the continuation of subsistence uses. Further, if additional restrictions are not applied to NFQUs, the ISC does not recommend conducting a section 804 prioritization among FQSUs at this time. We do not yet know the impact, if any, of designating Ketchikan as rural. Management agencies need to collect additional

data on the number of hunters and deer harvested on POW, specifically after Ketchikan becomes rural, to start understanding the impact of this regulation change.

It further is relevant that the Federal Subsistence Management Program does not conduct Section 804 prioritizations by special action as a matter of course. Special actions are undertaken in cases of emergencies or time-sensitive circumstances that necessitate a regulatory change before the next cycle. Section 804 analyses are in-depth and time intensive, benefiting tremendously from Council input and the public process and thus should be conducted during the regulatory cycle. Waiting to further restrict deer harvest on POW will allow for the opportunity to collect hunter use and harvest data and begin to determine if, and to what extent, Ketchikan's change in status may affect the Unit 2 deer population on POW. If a problem becomes apparent during the 2025 hunting season, i.e., excessive deer harvest, then the Board or in-season manager can adjust hunt opportunities under an emergency special action.

Given the uncertainty about the impacts of redesignating Ketchikan as rural and the Board or in-season manager's ability to address emergent problems through special action, the ISC believes implementing an 804 prioritization now is pre-mature. The recommended course of action is for the Board to instead consider wildlife proposal WP26-04 during the upcoming regulatory cycle in April 2026, which requests that the Board conduct a Section 804 analysis for Southeast Alaska's rural communities.