

<b>WP26–15 Executive Summary</b>	
<b>General Description</b>	<p>Proposal WP26-15 proposes closing Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D to deer hunting by non-federally qualified users.</p> <p><i>Submitted by: Native Village of Eyak</i></p>
<b>Proposed Regulation</b>	<p><b>Unit 6—Deer</b></p> <p><i>5 deer; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.</i></p> <p><i>Only 1 of the 5 deer harvest limit may be taken between Jan. 1 – 31.</i></p> <p><b><i>Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D are closed to deer hunting except by federally qualified subsistence users hunting under these regulations.</i></b></p>
<b>OSM Conclusion</b>	<b>Oppose</b>
<p><b>Southcentral Alaska Subsistence Regional Advisory Council</b></p> <p><b>Kodiak/Aleutians Alaska Subsistence Regional Advisory Council</b></p>	<p><b>Support</b></p> <p><b>Take No Action</b></p>
<b>Interagency Staff Committee Comments</b>	<b>See full comment at the end of this analysis.</b>
<b>ADF&amp;G Comments</b>	<b>Oppose</b>
<b>Written Public Comments</b>	<b>None</b>

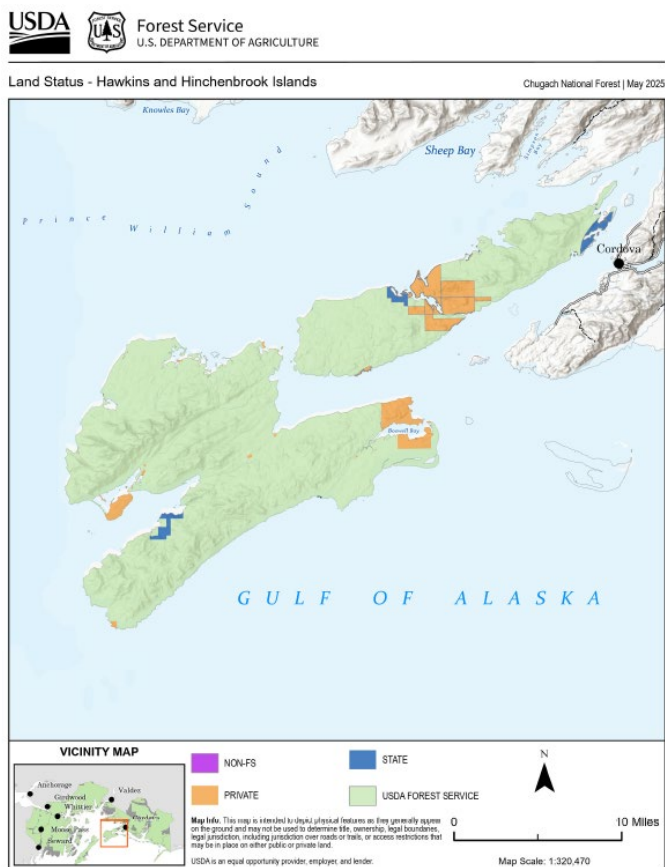
## Draft Wildlife Analysis WP26-15

### ISSUE

Proposal WP26-15, submitted by the Native Village of Eyak (NVE), proposes to close Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D to deer hunting by non-federally qualified users (NFQUs) (**Map 1**).

### Proponent Statement

The proponent states their request to close Hawkins and Hinchinbrook Islands to deer hunting by NFQUs is intended to address unmet subsistence needs they have identified in their community. NVE states that increased harvest pressure on deer in Eastern Prince William Sound (PWS) by NFQUs and declining deer density on Hawkins and Hinchinbrook Islands have resulted in FQSUs being unable to meet their subsistence needs. In a follow up conversation with a representative of NVE, the proponent clarified that the proposal was primarily intended to address a competition issue which has concerned Tribal members for multiple seasons, but an additional conservation concern arising during the 2024/25 hunting season prompted the Tribe to submit the proposal (Picke 2025, pers. comm.).



**Map 1.** Hawkins and Hinchinbrook Islands, with surface ownership indicated by color.

**Current Federal Regulations**

**Unit 6—Deer**

*5 deer; however, antlerless deer may be taken only from Oct. 1 – Jan. 31. Aug. 1 – Jan. 31*

*Only 1 of the 5 deer harvest limit may be taken between Jan. 1 – 31.*

**Proposed Federal Regulations**

**Unit 6—Deer**

*5 deer; however, antlerless deer may be taken only from Oct. 1 – Jan. 31. Aug. 1 – Jan. 31*

*Only 1 of the 5 deer harvest limit may be taken between Jan. 1 – 31.*

***Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D are closed to deer hunting except by federally qualified subsistence users hunting under these regulations.***

**Current State Regulations**

**Unit 6—Deer**

<i>Resident Hunters</i>	<i>5 deer; however, only bucks may be taken before Oct. 1</i>	<i>HT</i>	<i>Aug. 1 – Dec. 31</i>
-------------------------	---	-----------	-------------------------

<i>Nonresident Hunters</i>	<i>4 deer; however, only bucks may be taken before Oct. 1</i>	<i>HT</i>	<i>Aug. 1 – Dec. 31</i>
----------------------------	---	-----------	-------------------------

**Extent of Federal Public Lands**

Unit 6D is comprised of approximately 75% Federal public lands that consist of 73% U.S. Forest Service (USFS) managed lands and 2% Bureau of Land Management (BLM) managed lands.

Hawkins and Hinchinbook Islands in Unit 6D are comprised of approximately 93% Federal public lands that consist entirely of U.S. Forest Service (USFS) managed lands that are part of Chugach National Forest.

### **Customary and Traditional Use Determination**

The Federal Subsistence Board has not made a customary and traditional use determination for Deer in Unit 6. Therefore, all rural residents of Alaska may harvest this species in this area.

### **Regulatory History**

In 1990, the temporary Federal subsistence regulations for deer in Unit 6 were adopted from State regulations and had a harvest limit of “5 deer; however antlerless deer may be taken only from Sept. 15 - Dec. 31”, with a season of Aug. 1-Dec. 31 (36 CFR 242 & 50 CFR 100, 1990).

The subsequent year the State reduced the harvest limit in Unit 6 to “Four deer; however antlerless deer may be taken only from Nov. 1 – Dec. 31.” That year, the Chugach National Forest proposed changing the Federal harvest limit to mirror the State’s (P91-118). The justification for the proposal was that deer populations in the unit were declining due to recent heavy snow years, and the majority of hunting was for subsistence use. The Federal Subsistence Board (Board) adopted the proposal to mirror the State harvest limits and seasons.

In 1996, the Board adopted Proposal P96-21 to lengthen the antlerless season to Oct. 1-Dec. 31 (P96-21). In 1999, the Alaska Board of Game (BOG) increased the harvest limit for residents back to 5 deer. No significant change to the State regulations for deer in Unit 6 have occurred since.

There were also special actions in 2012 and 2013 to reduce the length of the antlerless season in response to high mortality in the deer population during the heavy snow winter of 2011/12 (WSA12-10, WSA13-07). The State also adjusted their antlerless season to the same dates via Emergency Order in 2012 and 2013.

In 2016, the Board adopted two proposals, increasing opportunity for subsistence users, including increasing the harvest limit to 5 deer in all of Unit 6 (WP16-12) and extending the buck season in Unit 6D to January 31 (WP16-11).

In 2022, Proposal WP22-13 requested to remove the restrictions on allowing designated hunters to harvest deer in Unit 6, which was rejected due to conservation concerns. Also in 2022, Proposal WP22-12 requested to extend the Unit 6 deer season to January 31. Previously, only Unit 6D had a January season for bucks-only, although many bucks have shed their antlers by January 1<sup>st</sup>. The Board adopted WP22-12 with modification to restrict the harvest limit for the January hunt to 1 deer, to help mitigate any potential conservation concern from harvesting does that late in the winter.

### **Biological Background**

Sitka black-tailed deer were introduced to Unit 6 between 1916 and 1923 (Paul 2009). Although Unit 6 is the northern limit of their range, the mild, maritime climate in PWS is similar to that of their natural range in Coastal Southeast Alaska and has allowed the population to thrive and expand throughout PWS (Reynolds 1979). However, the relative lack of big tree old growth forest and more frequent cold,

snowy winters result in more extreme population fluctuations than in their native range (Westing 2022, Jackson *et al.* 2023). The breeding season typically begins in late October and peaks in late November (Shoen and Kirchhoff 2007).

The State management objectives for deer in Unit 6 include (Westing 2022):

- Population of 24,000-28,000 deer.
- Harvest of 2,200 to 3,000 deer.
- When deer pellet transects indicate that the population is low, the 3-year average buck harvest should be >60% of the harvest. Harvest opportunity will be reduced if snow levels are identified as deep and persistent.
- If deer pellet transects find mean pellet groups per plot are >1.5 for 3 consecutive years, education efforts will focus on increasing doe harvest. Board of Game action may be pursued to liberalize deer harvest.

### Habitat

Sitka black-tailed deer occupy a variety of habitats in coastal Alaska. Throughout the year and depending on climate and weather patterns, they may occupy beaches, muskegs, low and mid-elevation forests, and alpine tundra (Schoen and Kirchhoff 2007). Big tree old growth forest habitat with a closed canopy and well developed understory is critical winter habitat for Sitka black-tailed deer, particularly in years with deep snow pack (Jackson *et al.* 2023).

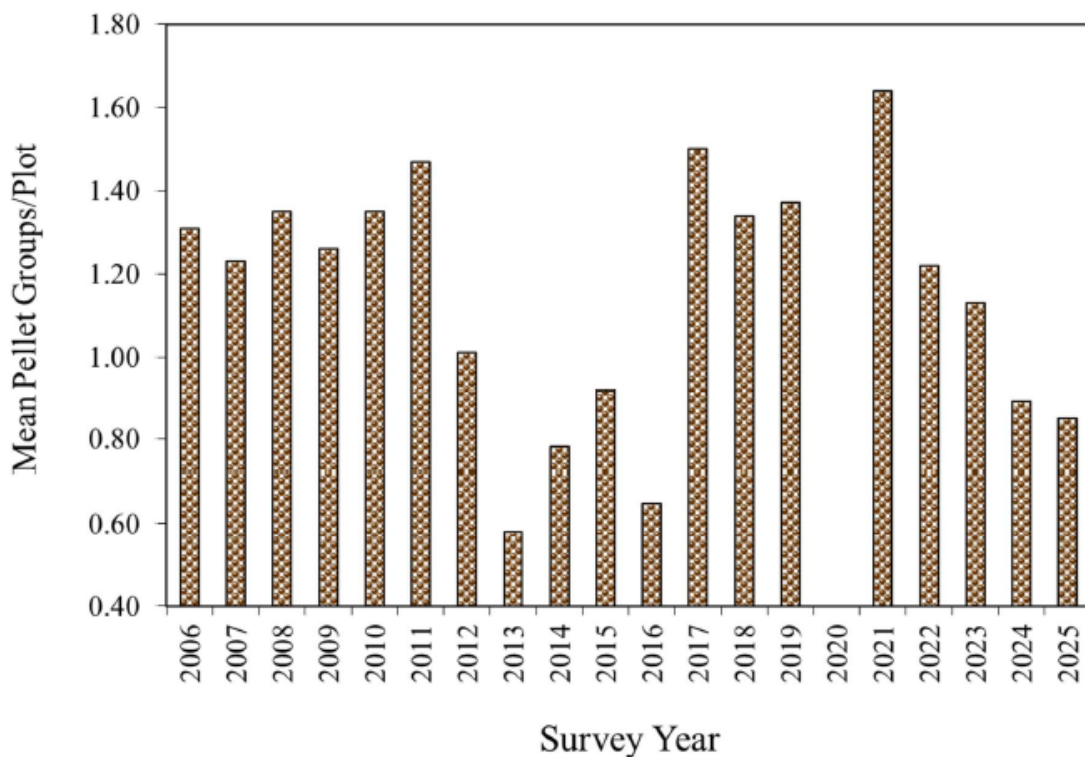
Prince William Sound experiences heavy snow events and periods of deep cold more frequently than Southeast Alaska. It also has fewer stands of cedar and shorter, smaller diameter spruce and hemlock. Populations of deer in the area typically expand and disperse into less favorable habitat during periods of mild winters, but then experience steep declines during severe winters (Reynolds 1979, Crowley 2011). Deep snow concentrates deer on the beaches where they experience high harvest rates if the deep snow conditions occur during the harvest season, potentially compounding the effects on the population (Westing 2022). Deep snow and high harvest during the winter of 2011/12 resulted in an estimated mortality of 50% - 70% of the Prince William Sound deer population (Westing 2014).

The winter of 2024/25 was warm and mild; however the previous 5 winters had average or above average late winter snowpack (Westing 2024). These snowy winters correlate with modest declines in the PWS deer pellet index (**Figure 1**). As there are no estimates of deer abundance in the unit, the deer pellet survey is used as an index of the deer population.

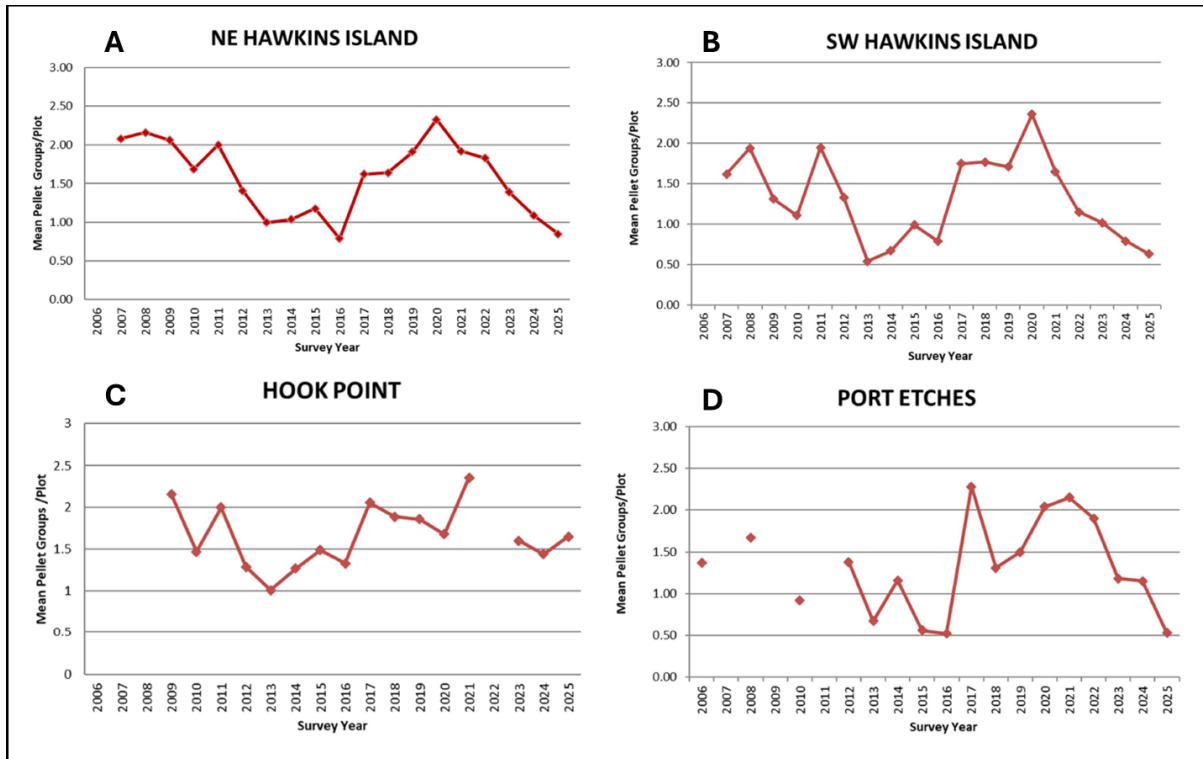
Despite several years of declining pellet counts, pellet densities in Unit 6D during the last full PWS survey remained in the “moderate” range (Westing 2024). In 2025, only Hawkins, Hinchinbook, and the north end of Montegue were able to be surveyed (Westing 2025). Mean pellet densities below 0.89 mean pellet groups per plot (MPGP) are considered “low”, MPGP between 0.89 and 1.35 are considered “moderate”, and MGPG above 1.35 are considered “high”. The average MGPG for the past 20 years is 1.16 (Westing 2025.) In 2024, the MGPG for the entire sound was 0.89 (Westing 2024). In

2025, MGP for the areas surveyed was 0.86 (Westing 2025). The island-wide MGP estimate for Hawkins Island was estimated to be between 0.59 and 0.76 (low), and the island-wide estimate for Hinchinbrook Island ranged from 0.77- 1.09 (moderate). Three of the four survey zones showed decreases from 2024 (**Figure 2**).

Pellet counts are a lagging indicator of the deer population, because deer produce pellets throughout the winter before starving in the springtime. For example, the severe mortality event during the winter of 2011/12 is somewhat evident in the 2012 pellet count, but was not fully represented until the 2013 pellet count (**Figure 1**). The winter of 2024-2025 was warm and mild, but the preceding two winters were very cold and snowy (Westing 2024, 2025), and the 2025 pellet counts are likely still representative of the 2023-2024 winter conditions. Additionally, the spring of 2025 was very warm and wet, which may have contributed to lower pellet counts due to significant greenup and rain damage to pellets before the start date of the surveys reducing sightability. In 2025 surveys began on May 8<sup>th</sup>, which is the earliest date they may begin to maintain consistency across years (Westing pers. comms. 2025).



**Figure 1.** Deer pellet counts 2006 to 2025 for Unit 6D (Westing 2025).



**Figure 2.** Mean Pellet Group Per Plot for each survey zone on Hawkins and Hinchinbrook Islands. 2A: NE Hawkins Island; 2B: SW Hawkins Island; 2C: Hook Point, Hinchinbrook Island; 2D: Port Etches, Hinchinbrook Island

### Cultural Knowledge and Traditional Practices

The area now known as Cordova lies within the traditional territory of the dAXunhyuu (Eyak), and has long been utilized by the Chugach Sugpiaq (Alutiiq) (Clark 1984, de Laguna 1990).

There were originally two dAXunhyuu Eyak settlements in the area, Alaganik and Eyak (de Laguna 1990). Like other Prince William Sound communities, Cordova has been shaped by multiple historical forces and events, including colonization—bringing disease, cultural displacement, and profound social change—as well as the fur trade, the growth of commercial fishing and canneries, mining, the 1964 great Alaska earthquake, and the 1989 Exxon Valdez oil spill (Davis 1984, Simeone and Miraglia 2000). Cordova is only accessible by boat or plane. In 2024, the community had an estimated population of 2,506 (ADLWD 2024). Commercial fishing and subsistence activities are considered central to the culture and economy of the community (ADCCED 2018).

Deer were introduced to Prince William Sound in 1916 and have become an important subsistence resource over time (Stratton 1990). Prior to their introduction, goats and bears were the most important large mammals available to residents (Stratton 1990). ADF&G, Division of Subsistence periodically surveys communities for their subsistence harvest and use during a study year, documenting harvest under any opportunity, State or Federal. Cordova, Chenega Bay, and Tatitlek have been surveyed more

intensively than many other communities due to their exposure to the 1989 Exxon Valdez oil spill. Cordova households have been surveyed for their use of deer eight times by ADF&G, Division of Subsistence between 1985 and 2014 (Stratton 1989, 1992; Fall and Utermohle 1999; Fall 2006; Fall and Zimpelman 2016; ADF&G 2025, **Table 1**).

The most recent subsistence survey of Cordova was conducted by ADF&G, Division of Subsistence for the 2014 study year (Fall and Zimpelman 2016). Deer were the second most-used large land mammal, after moose, making up about 7% of Cordova's total estimated wild food harvest in 2014 (Fall and Zimpelman 2016). Division of Subsistence estimated that the community as a whole harvested 472 deer, primarily in October and November, resulting in an estimated 7.8 pounds of food per person (Fall and Zimpelman 2016, ADF&G 2025). This was Cordova's lowest deer harvest of any survey year, as measured in pounds per person (ADF&G 2025, **Table 1**).

People who participated in the surveys reported that the deer population had been impacted by record snowfall in 2012 and had not yet recovered by 2014. Because of reduced local deer abundance, some households chose not to hunt them that year (Fall and Zimpelman 2016). While moose provide an alternative to deer, some participants said that accessing moose hunting areas can be challenging (Fall and Zimpelman 2016). In 2014, surveyed households searched for deer on Hinchinbrook and Hawkins Islands (Fall and Zimpelman 2016).

Locals report that their ability to harvest deer is variable and depends on winter weather. They have the most success hunting deer when there is snow (SCRAC 2019, 2021a, 2021b). At the March 2019 Southcentral Council meeting, the Council Member from Chenega Bay said, “[It was] a mild winter. Good for the deer population...but that also correlates to probably lower harvest rates because of less snow conditions concentrating the deer in the places where they are harvested” (SCRAC 2019).

Residents of Prince William Sound have expressed concern about increased competition for fish and wildlife, which they attribute to “increasing numbers of private urban users and commercial operations” (Fall, cited in Poe and Gimblett et al. 2017:110). A subsistence survey conducted for the 2003 study year found that in response to increased competition, local residents had either increased their harvest effort to compensate, or had reduced their harvest effort to avoid competition altogether (Fall 2006). That year, Cordova respondents who thought there were fewer deer available attributed the decline to both increased competition and changes in the environment (Fall 2006).

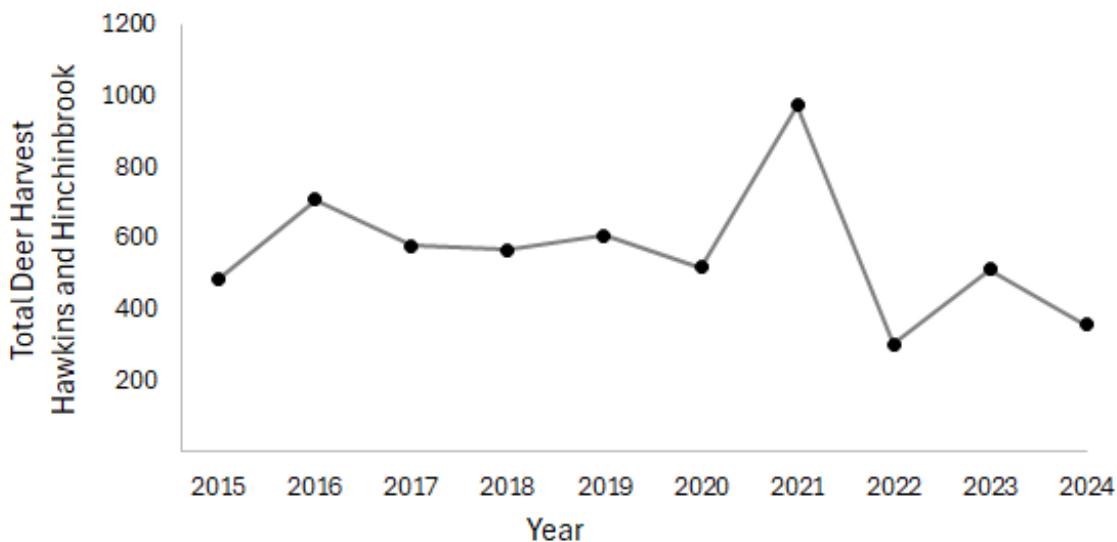
**Table 1.** Four measures of use of deer by residents of Cordova, as documented in subsistence surveys conducted by ADF&G, Division of Subsistence between 1985 and 2014 (ADF&G 2025).

Survey Year	Percentage of Surveyed Households Using Deer	Percentage of Surveyed Households Attempting to Harvest Deer	Percentage of Surveyed Households Harvesting Deer	Estimated Pounds of Deer Harvested Per Person
1985	65%	51%	32%	17.2
1988	73%	56%	39%	26.0
1991	68%	55%	38%	16.1
1992	83%	51%	44%	18.8
1993	66%	48%	23%	10.2
1997	73%	48%	41%	24.8
2003	62%	43%	39%	24.2
2014	45%	31%	21%	7.8
<b>Average</b>	<b>67%</b>	<b>48%</b>	<b>35%</b>	<b>17.9</b>

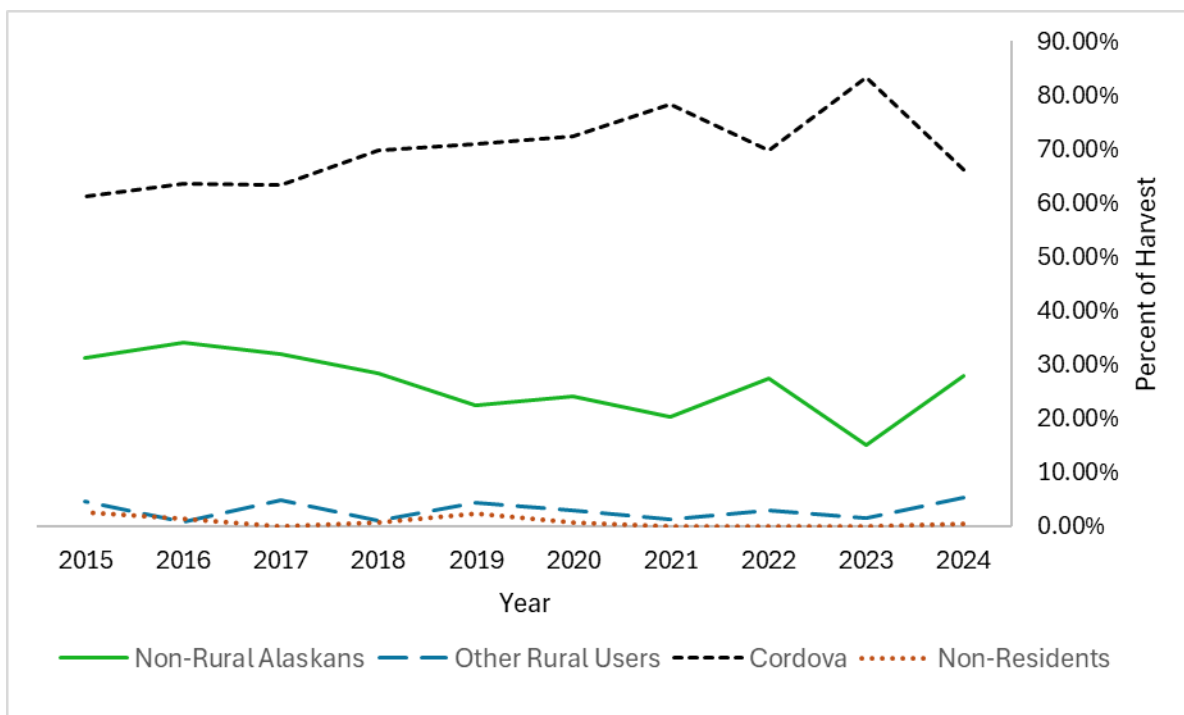
### Harvest History

The majority of deer harvested in Unit 6 are harvested from subunit 6D. On average, 1,665 deer are harvested annually from 6D, compared to 4.46, 1.57, and 0.11 deer in Unit 6C, 6B, and 6A respectively (ADF&G 2025). Within Unit 6D, most deer are harvested off the major islands of Hawkins, Hinchinbrook, and Montague which support the most extensive winter habitat (Westing 2022). From 2015 to 2024, reported deer harvest just on Hawkins and Hinchinbrook Islands ranged from 267 to 807 (**Figure 3**). The combined harvest on Hawkins and Hinchinbrook Islands averaged 39.7% of the total Unit 6D harvest during the same period. High harvest during the heavy snow event of 2021 was followed by low harvest in 2022 (**Figure 3**, Westing & Fowler, 2025 pers. comm.)

Most deer harvest on Hawkins and Hinchinbrook Islands is by FQSUs (**Figure 4**). Between 2015 and 2024, 72.9% of all deer harvested on the two islands were harvested by FQSUs, and 70.2% of all deer harvested were by residents of Cordova specifically. The remaining 2.7% of deer harvested by FQSUs were by residents of 34 other rural communities. Of the 27% of deer harvested by NFQUs, 0.9% were harvested by non-residents, and 26.2% were harvested by non-rural Alaskan residents. In 2024, 66.3% of the deer harvested from the two islands were harvested by residents of Cordova (Westing & Fowler, 2025 pers. comm.) During the 2023/2024 hunting season, the GMU 6D harvest rate was 0.8 deer per hunter, which was down from the 10 year average of 1.1 deer per hunter (ADF&G 2025).



**Figure 3.** Total Reported Deer Harvest on Hawkins and Hinchinbrook Islands not including expansion factor, 2015-2024 (Westing & Fowler 2025, pers. comm.)



**Figure 4.** Federally qualified subsistence users have harvested between 64% and 85% of the deer harvested from Hawkins and Hinchinbrook Islands between 2015 and 2024, with the majority harvested by residents of Cordova (Westing & Fowler 2025, pers. comm).

## Discussion and Effects

If Proposal WP26-15 is adopted, deer hunting on the Federal public lands of Hawkins and Hinchinbrook Islands in Unit 6D would be closed to NFQUs. This may reduce conflict between user groups and reduce harvest pressure on deer in the closure area, but is unlikely to significantly affect subsistence opportunity or the continuation of subsistence uses. Currently, subsistence priority is provided by a late season to hunt deer in January after the State season has closed. While FQSUs have reported some competition and displacement issues in Unit 6, winter weather may be a greater factor affecting FQSU opportunity.

Adopting this proposal is not expected to substantially impact the deer population on these islands. NFQUs only account for about a quarter of the reported deer harvest on these islands and pellet counts do not indicate any conservation concerns. Deer abundance and mortality is affected by winter severity. Weather conditions during the winter of 2024-2025 were favorable to deer and could explain the low numbers some hunters observed (i.e. deer were in mid-elevation timber with dense understory and not concentrated on the beach).

It would also increase the burden on law enforcement to determine in the field if users are federally qualified for a hunt that is open to all rural residents, and to determine if hunters are harvesting above mean high tide on Federal lands, or in the inter-tidal zone on State lands, which would still be open under State regulations.

## OSM CONCLUSION

### Oppose Proposal WP26-15

#### Justification

Per §815(3) of ANILCA, restriction on nonsubsistence uses are only authorized when necessary for the conservation of healthy wildlife populations or to continue subsistence uses. At this time it does not appear that there is a significant conservation concern or that the continuation of subsistence uses is being severely impacted. The PWS pellet count index does indicate that the population of deer on these islands is low to moderate; however there are reasons to interpret this result as conservative. Overall, the deer population in Prince William Sound is prone to short term fluctuations in response to winter conditions and is expected to rebound after the most recent mild winter. Additionally, relatively few deer are harvested on these islands by NFQUs, and the percentage of deer harvested by NFQUs has been trending downward over the last decade. Harvest data also suggest FQSUs are generally successful on Hawkins and Hinchinbrook. Therefore, closing the island to NFQUs would not be expected to have a substantial impact on FQSU opportunity and would represent an unnecessary restriction on NFQUs.

## LITERATURE CITED

ADCCED (Alaska Department of Commerce, Community, and Economic Development). 2018. Community Database Online: Cordova.

<https://www.commerce.alaska.gov/dcra/DCRAExternal/community/Details/19933dbf-2637-4b88-ba6a-9021796c9354> .Retrieved June 5, 2018.

ADF&G. 2025. Deer Hunting Statistics. <https://www.adfg.alaska.gov/index.cfm?adfg=deerhunting.deerharvest>. Retrieved June 9, 2025.

ADF&G. 2025. Community Subsistence Information System (CSIS), Alaska Department of Fish and Game, Div. of Subsistence. <https://www.adfg.alaska.gov/sb/CSIS/>. Retrieved: April 16, 2025.

ADLWD (Alaska Department of Labor and Workforce Development), Research and Analysis Section. 2024. Cities and Census Designated Places (CDPs), 2020 to 2024. Retrieved April 21, 2025.

<https://live.laborstats.alaska.gov/data-pages/alaska-population-estimates>

Clark, D.W. 1984. Pacific Eskimo: Historical Ethnography. Pages 185-197 *in* Handbook of North American Indians: Volume 5: Arctic. D. Damas, ed. Smithsonian Institution. Washington, D.C.

Crowley, D. W. 2011. Unit 6 deer management report. Pages 81–95 *in* P. Harper, editor. Deer management report of survey and inventory activities 1 July 2008–30 June 2010. ADF&G. Juneau, AK.

Davis, N. Y. 1984. Contemporary Pacific Eskimo. Pages 198-203 *in* Handbook of North American Indians. Vol. 5: Arctic. D. Damas, ed. Smithsonian Institution, Washington DC.

de Laguna, F. 1990. Eyak. Pages 189-196 *in* William C. Sturtevant, ed. Handbook of North American Indians. Northwest Arctic: Volume 7. Smithsonian Institution. Washington, D.C.

Fall, J. A. 2006. Update of the status of subsistence uses in *Exxon Valdez* oil spill area communities. *Exxon Valdez Oil Spill Restoration Project Final Report* (Restoration Project 040471), ADF&G, Division of Subsistence. Anchorage, AK.

Fall, J.A., C.J. Utermohle. 1999. Subsistence harvests and uses in eight communities ten years after the Exxon Valdez Oil Spill. Compiled by Chugach Regional Resources Commission. ADF&G, Division of Subsistence Technical Paper No. 252. Juneau, AK.

Fall, J.A. and G. Zimpelman. 2016. Update on the status of subsistence uses in Exxon Valdez Oil Spill Area Communities, 2014. ADF&G, Division of Subsistence Technical Paper No. 412, Anchorage, AK.

Jackson, D.H., McCoy, K.R., McCorquodale, Hansen, S.J.K., Pendergast, S.R., and Casady D.S. 2023. Coastal Rainforest Ecoregion. Pages 179-202 *in* J.R. Heffelfinger and P.R. Krausman, eds. Ecology and Management of Black-Tailed and Mule Deer of North America. CRC Press. Boca Raton, FL. 506 pp.

OSM. 1991. Staff Analysis P91-118. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM. 1996. Staff Analysis P96-21. Office of Subsistence Management, USFWS. Anchorage, AK.

- OSM 2012. Wildlife Special Action WSA12-10. Office of Subsistence Management, USFWS. Anchorage, AK.
- OSM 2013. Wildlife Special Action WSA13-07. Office of Subsistence Management, USFWS. Anchorage, AK.
- OSM 2016. Staff Analysis WP16-11. Office of Subsistence Management, USFWS. Anchorage, AK.
- OSM 2016. Staff Analysis WP16-12. Office of Subsistence Management, USFWS. Anchorage, AK.
- OSM 2022. Staff Analysis WP22-12. Office of Subsistence Management, USFWS. Anchorage, AK.
- OSM 2022. Staff Analysis WP22-13. Office of Subsistence Management, USFWS. Anchorage, AK.
- Paul, T. W. 2009. Game transplants in Alaska. Technical bulletin No. 4, second edition. ADF&G. Juneau, AK.
- Piche, M., 2025, personal communication
- Poe, A.J. and R. Gimblett. 2017. Sustaining wildlands: Integrating science and community in Prince William Sound. University of Arizona Press. Tucson, AZ.
- Reynolds, J. L. 1979. History and current status of Sitka black-tailed deer in Prince William Sound. Pages 177 – 183 in O. C. Wallmo and J. W. Schoen, editors. Sitka black-tailed deer: Proceedings of a conference in Juneau, Alaska. U.S. Department of Agriculture Forest Service, Alaska Region. Series No. R10-48. 231 pp.
- Schoen, J., and M. Kirchhoff. 2007. Sitka black-tailed deer (*Odocoileus hemionus sitkensis*). Pages 1 – 16 in J. W. Schoen and E. Dovichin, editors. The coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest: a conservation assessment and resource synthesis. Audubon Alaska and The Nature Conservancy. Anchorage, AK.
- SCSRAC, 2019. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings. March 25, 2019. Office of Subsistence Management, USFWS. Anchorage, AK.
- SCSRAC, 2021a. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings. February 24, 2021. Office of Subsistence Management, USFWS. Anchorage, AK.
- SCSRAC, 2021b. Transcripts of the Southcentral Subsistence Regional Advisory Council proceedings. February 25, 2021. Office of Subsistence Management, USFWS. Anchorage, AK.
- Simeone, W. E., and R. A. Miraglia. 2000. An Ethnography of Chenega Bay and Tatitlek, Alaska. ADF&G, Division of Subsistence. Special Publication No. SP2000-001. Anchorage, AK.
- Stratton, L. 1989. Resource uses in Cordova, a coastal community of Southcentral Alaska. ADF&G, Division of Subsistence Technical Paper No. 153. Anchorage, AK.
- Stratton, L. 1990. Resource harvest and use in Tatitlek, Alaska. ADF&G, Division of Subsistence Technical Paper No. 181. Anchorage, AK.
- Stratton, L. 1992. Cordova: A 1988 update on resource harvests and uses. ADF&G, Division of Subsistence Technical Paper No. 204. Juneau, Ak.

Westing, C. 2014. Completion of deer pellet surveys in Prince William Sound. Unpublished memo, June 27, 2014. ADF&G., Cordova, AK. 3pp.

Westing, C. L. 2022. Deer management report and plan, Game Management Unit 6: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-21, Juneau.

Westing, C. 2024. Completion of deer pellet surveys in Prince William Sound. Unpublished memo, July 9, 2024. ADF&G., Cordova, AK. 3pp.

Westing, C. 2025. Completion of deer pellet surveys in Prince William Sound. Unpublished memo, June 25, 2025. ADF&G., Cordova, AK. 3pp.

Westing, Charlotte & Fowler, Nick. 2025. Area Biologist & Biometrician. Personal communication: email. ADF&G. Anchorage, AK.

## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

### Southcentral Alaska Subsistence Regional Advisory Council

**Support.** The Council noted that there is a marked increase in activity in this area by non-federally qualified users that could impact future opportunities for subsistence users. The Council noted that assessing the deer population is challenging on the island, but believes that the proposed closure is good stewardship of the land.

### Kodiak/Aleutians Alaska Subsistence Regional Advisory Council

**Take no action.** The Council supports taking no action on this proposal, recognizing that it concerns an area outside of their region where they have little direct use. Members noted that the biological data does not indicate a need to restrict access to federal public lands and that such decisions are best left to the home region. Since residents of our area do not typically hunt in Unit 6D, the Council finds it appropriate to defer to the region most affected.

## INTERAGENCY STAFF COMMITTEE COMMENT

The Federal Subsistence Board (Board) will need to consider a few key sections of ANILCA before taking action on proposals requesting closures and closure reviews. Specifically, those sections of Title VIII pertaining to Council Deference and the limitations to closures or restrictions of subsistence and nonsubsistence uses on federal public lands.

ANILCA Section 815(3) clarifies that “nothing in this title shall be construed as...authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on public lands unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in 816, to continue subsistence uses of such populations, or pursuant to other applicable law.”

ANILCA Section 816(b) allows for closure or restriction of Federal public lands to subsistence uses of fish and wildlife for “for reasons of public safety, administration, or to assure the continued viability of a particular fish or wildlife population.”

ANILCA Section 805(c) the Board must consider the recommendations of the Councils “concerning the taking of fish and wildlife” on public lands in their regions and may choose not to follow such a recommendation only if it is not supported by substantial evidence, violates recognized principles of fish and wildlife conservation, or would be detrimental to the satisfaction of subsistence needs.

These three sections speak to the heart of Board authority and require a careful balance between the federal priority, the continuation of subsistence uses, the necessary conservation of subsistence fish and wildlife, and unnecessary restrictions. In the case of WP26-15 the ISC suggests that the Council’s recommendation to close deer hunting on federal lands in Unit 6D by NFQUs may not meet the criteria for deference.

## ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

### **Wildlife Proposal WP26-15**

This proposal would close Federal public lands on Hawkins Island and Hinchinbrook Island in Game Management Unit (GMU) 6D to deer hunting by non-federally qualified users (NFQU).

### **Position**

The Alaska Department of Fish & Game (ADF&G) OPPOSES these proposals because there are no justifications under the Alaska National Interest Lands Conservation Act (ANILCA) for the Federal Subsistence Board (FSB) to approve this restriction. If enacted, they would unnecessarily deprive NFQUs of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA which states closures can only occur when necessary for the conservation of healthy wildlife populations or to continue subsistence uses. There is not a conservation concern nor is the continuation of subsistence uses being impacted.

### **Background**

Sitka black-tailed deer were introduced to GMU 6 between 1916 and 1923 (Paul 2009). Although GMU 6 is the northern limit of their range, the mild, maritime climate in Prince William Sound (PWS) is similar to that of their natural range in coastal southeast Alaska and has allowed the population to thrive and expand throughout PWS (Reynolds 1979). However, the relative lack of big tree old growth forest and more frequent cold, snowy winters result in more extreme population fluctuations than in their native range (Westing 2022, Jackson *et al.* 2023). The breeding season typically begins in late October and peaks in late November (Shoen and Kirchhoff 2007).

The State management objectives for deer in GMU 6 include (Westing 2022):

- Population of 24,000-28,000 deer.
- Harvest of 2,200 to 3,000 deer.
- When deer pellet transects indicate that the population is low, the 3-year average buck harvest should be >60% of the harvest. Harvest opportunity will be reduced if snow levels are identified as deep and persistent.
- If deer pellet transects find mean pellet groups per plot are >1.5 for 3 consecutive years, education efforts will focus on increasing doe harvest. Board of Game action may be pursued to liberalize deer harvest.

Sitka black-tailed deer occupy a variety of habitats in coastal Alaska. Throughout the year and depending on climate and weather patterns, they may occupy beaches, muskegs, low and mid-elevation forests, and alpine tundra (Schoen and Kirchhoff 2007). Big tree old growth forest habitat with a closed canopy and well developed understory is critical winter habitat for Sitka black-tailed deer, particularly in years with deep snowpack (Jackson *et al.* 2023).

Prince William Sound experiences heavy snow events and periods of deep cold more frequently than Southeast Alaska. It also has fewer stands of cedar and shorter, smaller diameter spruce and hemlock. Populations of deer in winters basically expand and disperse into less favorable habitat during periods of mild winters but then experience steep declines during severe winters (Reynolds 1979, Crowley 2011). Deep snow concentrates deer on the beaches where they experience high harvest rates if the deep snow conditions occur during the harvest season, potentially compounding the effects on the population (Westing 2022). Deep snow and high harvest during the winter of 2011/12 resulted in an estimated mortality of 50% - 70% of the Prince William Sound deer population (Westing 2014). The winter of 2024/25 was warm and mild however the previous 5 winters had average or above average late winter snowpack (Westing 2024). These snowy winters correlate with modest declines in the PWS deer pellet index (Figure 1). As there are no estimates of deer abundance in the GMU, the deer pellet survey is used as an index of the deer population.

Most deer harvest on Hawkins and Hinchinbrook Islands is by FQSUs. Between 2015 and 2024, 72.9% of all deer harvested on the two islands were harvested by FQSUs, and 70.2% of all deer harvested were by residents of Cordova specifically. The remaining 2.7% of deer harvested by FQSUs were by residents of 34 other rural communities. Of the 27% of deer harvested by NFQUs, 0.9% were harvested by non-residents, and 26.2% were harvested by non-rural Alaskan residents. In 2024, 66.3% of the deer harvested from the two islands were harvested by residents of Cordova. During the 2023/2024 hunting season, the GMU 6D harvest rate was 0.8 deer per hunter, which was down from the 10-year average of 1.1 deer per hunter.

#### **Impact on Federally Qualified Users**

If adopted, federally qualified users would not see the improvement to their hunting opportunity they feel this closure would do given there are pieces of private land as well as state public land below ordinary high water that NFQUs will still have the opportunity to harvest deer in GMU 6D.

#### **Impact on Other Users**

If adopted, NFQUs would have dramatically less opportunity to hunt for deer in GMU 6D.

#### **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 deer in GMU 6.

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the BOG 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.

An 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 6 is 1,000-1,250 animals. The season and bag limit for is:

The season for resident and nonresident hunters was 1 August–31 December. The bag limit was 5 deer for residents and 4 for nonresidents. Female deer could be taken beginning 1 October.

### **Conservation Issues**

There are no conservation issues associated with this proposal regardless of its passage.

### **Enforcement Issues**

Hawkins and Hinchinbrook Islands are not entirely federal public land. This creates challenges determining land ownership and residency. It will be up to federal law enforcement to enforce the closure.

### **References**

Crowley, D. W. 2011. Unit 6 deer management report. Pages 81–95 in P. Harper, editor. Deer management report of survey and inventory activities 1 July 2008–30 June 2010. ADF&G. Juneau, AK.

Jackson, D.H., McCoy, K.R., McCorquodale, Hansen, S.J.K., Pendergast, S.R., and Casady D.S. 2023. Coastal Rainforest Ecoregion. Pages 179-202 in J.R. Heffelfinger and P.R. Krausman, eds. Ecology and Management of Black-Tailed and Mule Deer of North America. CRC Press. Boca Raton, FL. 506 pp.

Paul, T. W. 2009. Game transplants in Alaska. Technical bulletin No. 4, second edition. ADF&G. Juneau, AK.

Reynolds, J. L. 1979. History and current status of Sitka black-tailed deer in Prince William Sound. Pages 177 – 183 in O. C. Wallmo and J. W. Schoen, editors. Sitka black-tailed deer: Proceedings of a conference in Juneau, Alaska. U.S. Department of Agriculture Forest Service, Alaska Region. Series No. R10-48. 231 pp.

Schoen, J., and M. Kirchhoff. 2007. Sitka black-tailed deer (*Odocoileus hemionus sitkensis*). Pages 1 – 16 in J. W. Schoen and E. Dovichin, editors. The coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest: a conservation assessment and resource synthesis. Audubon Alaska and The Nature Conservancy. Anchorage, AK.

Westing, C. 2014. Completion of deer pellet surveys in Prince William Sound. Unpublished memo, June 27, 2014. ADF&G., Cordova, AK. 3pp.

Westing, C. 2024. Completion of deer pellet surveys in Prince William Sound. Unpublished memo, July 9, 2024. ADF&G., Cordova, AK. 3pp.

Westing, C. L. 2022. Deer management report and plan, Game Management Unit 6: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-21, Juneau.